

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
CENTRAL REGION

---

***FINDING OF NO SIGNIFICANT IMPACT  
AND  
RECORD OF DECISION***

---

**Proposed Terminal Replacement Project**

Kansas City International Airport  
Kansas City, Platte County, Missouri



February 2019

## GENERAL INFORMATION ABOUT THIS DOCUMENT

**WHAT'S IN THIS DOCUMENT?** This document is the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) and Record of Decision (ROD) for the proposed Terminal Replacement Project at Kansas City International Airport (KCI) located in Kansas City, Missouri. This document includes the agency determinations and approvals for those proposed Federal actions described in the Final Environmental Assessment, Section 106 Evaluation, and Section 4(f) Statement dated February 2019. This document discusses all alternatives considered by FAA in reaching its decision, summarizes the analysis used to evaluate the alternatives, and briefly summarizes the potential environmental consequences of the Proposed Action Alternative and the No Action Alternative, which are evaluated in this FONSI and ROD. This document also identifies the environmentally preferred alternative and the agency preferred alternative. This document identifies applicable and required mitigation.

**BACKGROUND.** In August 2018, the City of Kansas City, through its Airport Department- Kansas City Aviation Department (KCAD) prepared a Draft Environmental Assessment and Section 106 Evaluation (Draft EA). The Draft EA addressed the potential environmental effects of the proposed project including various reasonable alternatives to that proposal. The Draft EA was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA)[Public Law 91-190, 42 USC 4321-4347], the implementing regulations of the Council on Environmental Quality (CEQ) [40 CFR Parts 1500-1508], and FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures* and 5050.4B, *National Environmental Policy Act (NEPA), Implementing Instructions for Airport Actions*. KCAD published the Notice of Availability for the Draft EA and Section 106 Evaluation on August 23, 2018 and the Draft Section 4(f) Statement on September 10, 2018. A public workshop and hearing was conducted on September 24, 2018. KCAD received written comments on the Draft EA and Section 106 Evaluation between August 23, 2018 and October 2, 2018. No comments were received regarding the Draft Section 4(f) Statement during its comment period between September 10, 2018 and October 10, 2018. FAA approved the Final EA, Section 106 Evaluation, and Section 4(f) Statement on February 21, 2019.

**WHAT SHOULD YOU DO?** Read the FONSI and ROD to understand the actions that FAA intends to take relative to the proposed Terminal Replacement Project at Kansas City International Airport.

**WHAT HAPPENS AFTER THIS?** The City of Kansas City may begin to implement the Proposed Action Alternative.

**DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
CENTRAL REGION  
FINDING OF NO SIGNIFICANT IMPACT AND RECORD OF DECISION  
  
PROPOSED TERMINAL REPLACEMENT PROJECT  
  
KANSAS CITY INTERNATIONAL AIRPORT  
KANSAS CITY, MISSOURI**

**INTRODUCTION:**

This document is a Finding of No Significant Impact (FONSI) and Record of Decision (ROD) (FONSI/ROD) prepared pursuant to the National Environmental Policy Act of 1969 (NEPA) for the proposed new replacement terminal at Kansas City International (KCI), in Platte County, Kansas City, Missouri. The City of Kansas City, Missouri, Aviation Department (KCAD) is responsible for the operations of KCI. The Federal Aviation Administration (FAA) must comply with NEPA and other applicable statutes before taking any actions that are necessary prior to implementation of the project. NEPA requires that after preparing an Environmental Assessment, federal agencies must decide whether to issue a FONSI and approve the proposed project, or prepare an environmental impact statement prior to rendering a final decision on approval of a proposed project. The FAA has completed the environmental assessment, considered its analysis, and determined that no further environmental review is required. Therefore, the FAA is issuing the FONSI/ROD accompanied and supported by the FAA's Final Environmental Assessment, Section 106 Evaluation, and Section 4(f) Statement (Final EA), completing environmental review requirements for the project.

**PURPOSE AND NEED:**

KCI is a publicly owned passenger and cargo airport. KCI is located in the southeast section of Platte County, Missouri, approximately 18 miles northwest of downtown Kansas City. The airfield system consists of three runways and three passenger terminals. The terminals have a unique structure in the shape of three circular concourse structures (rings) arranged contiguous to a one-way circular looped entrance roadway.

The existing terminals were developed to produce the "drive-to-the-gate" capability for a great percentage of the passengers. The plan permits the passenger to arrive virtually at the door of the aircraft. The enplaning and deplaning curb is directly across a narrow concourse from the aircraft position. Ticketing and baggage facilities are located at short intervals along the building to minimize lateral movement. The plan was designed to achieve passenger convenience.

The geometric forms of the existing terminals and the textured concrete surfaces express the Brutalist architectural style with very linear, fortress like blockish structures, and a predominance of concrete construction. The local architectural firm of Kivett & Myers was the architect of record for the existing KCI passenger terminals. Throughout the firm's history, Kivett & Myers maintained a philosophy based on purity of form, structural expression, and technological innovation that resulted in a high degree of stylistic consistency.

The very reasons which make the existing terminals unique, are the same reasons why the existing buildings cannot be renovated or repurposed. The terminals have structural constraints that include its concrete foundation walls and structural support columns that cannot be moved since they are integral to the structural integrity of the building roof system. These structural constraints significantly impact the ability to readjust and change the size and configuration of interior spaces. The horseshoe geometry of these terminal buildings further constrain the ability to change and adapt space that is needed to provide security screening checkpoint lanes and moving walkways that require a more rectangular shape. The existing terminal shape also limits most passenger services, such as concessions, hotel and shuttle kiosks, and guest seating and restrooms.

The City of Kansas City through its Aviation Department (KCAD) identified deficiencies within the existing passenger terminal facilities at the Kansas City International Airport (KCI). Currently, Terminals A, B, and C are configured internally to operate in a separate but identical manner. The configuration of the existing terminals means that once passengers pass through security checkpoints, they are essentially locked into that seating area and cannot pass through to other parts of the terminal. The existing terminals lack adequate restrooms, restaurants, shopping, and lounges. The existing terminals require extensive and expensive work to improve public accessibility and update utility infrastructure.

The purpose for the proposed new replacement terminal is to provide a better customer experience for passengers. Other purposes include ensuring continued safe, secure, and efficient airport operations by providing space for current and potential future demand while avoiding duplication of services and systems.

The 2008 Master Plan Update for KCI identified the need for an updated passenger terminal complex to provide a passenger processing facility that would: increase the passenger level of service that maintains efficient airside and landside operations; update utility infrastructure; maintain safety; provide space for security requirements; and reduce operational costs by avoiding duplication of terminal systems.

Chapter 1 of the Final EA describes the Purpose and Need that will be accomplished through the construction of the replacement terminal. The Proposed Action includes several individual development components that collectively would improve the customer experience for passengers and ensure continued safe, secure, and efficient airport operations by providing space for current and potential future demand, while avoiding duplication of

services and systems. This FONSI/ROD addresses KCAD's proposed replacement terminal as described below.

**PROPOSED ACTION AND REQUESTED FEDERAL ACTIONS:**

The Proposed Action consists of the following improvements, as shown on the April 21, 2015, conditionally approved Airport Layout Plan (ALP) and as described in detail Chapter 1 of the Final EA:

1. Demolish existing Terminal A, including the Terminal A parking garage and aircraft apron;
2. Construct a new replacement terminal (initial build to 39 gates, future 42 gates) and provide updated utilities including water lines;
3. Construct a new parking garage and surface parking lot;
4. Construct new terminal apron area around the replacement terminal including providing new fuel hydrants;
5. Modify existing roadways and construct new roadways in the terminal area;
6. Construct various storm water collection system improvements including improved glycol recovery system (deicing) and facilities;
7. Construct replacement Central Utility Plant (CUP) and provide redundant electrical underground electrical power utility feed;
8. Resurface and rehabilitate the taxiways in the vicinity of the replacement terminal; and,
9. Decommission and demolish existing Terminal B and Terminal C and consolidate airline operations at the new replacement terminal (Terminal B and C would remain open during construction of the new terminal).

The Proposed Action is shown in Exhibit 1-2 of the Final EA. FAA will take the following actions to authorize implementation of the proposed projects:

- Unconditional approval of the Airport Layout Plan (ALP) to depict the proposed improvements pursuant to 49 USC §§ 40103(b) and 47107(a)(16).
- Determinations under 49 USC 47106 and 47107, relating to the eligibility of the Proposed Action for federal funding under the Airport Improvement Program (AIP) and/or determinations under 49 USC 40117, as implemented by 14 CFR 158.25, to impose and use passenger facility charges (PFCs) collected at the airport to assist with construction of potentially eligible development items shown on the ALP including the proposed construction of the replacement terminal and associated actions that may directly or indirectly impact FAA facilities including but not limited to utility relocations.
- Determination under 49 USC § 44502(b) that the airport development is reasonably necessary for use in air commerce or in the interests of national defense.
- Approval of a Construction Safety and Phasing Plan to maintain aviation and airfield safety during construction pursuant to FAA Advisory Circular (AC)

150/5370-2F, Operational Safety on Airports During Construction (14 CFR Part 139 [49 USC § 44706]).

- Approval of changes to the airport certification manual pursuant to 14 CFR Part 139 (49 USC § 44706).
- Determinations, through the aeronautical study process, under 14 CFR Part 77, regarding obstructions to navigable airspace (49 USC Section 40103 (b) and 40113).

### **ALTERNATIVES CONSIDERED:**

Chapter 2 of the Final EA describes the alternatives considered and screening process used to evaluate the alternatives.

As discussed in Section 2.2 of the Final EA, beginning in 1995, KCAD initiated a variety of planning efforts to address the planning of terminal facilities such as development of an airport master plan and terminal improvement program. KCAD's 2008 Master Plan Update provided a vision for the growth and development of KCI facilities and land use decisions. In 2011 KCAD's Advance Terminal Planning Study initiated research and analysis that produced the Program Criteria Document (PCD) for KCAD and the Terminal Area Master Plan (TAMP) for the FAA. The TAMP recommended a single new terminal to replace the three existing terminals. In July 2013, the Mayor of Kansas City formed the Aviation Terminal Advisory Group (ATAG) which developed a Final Report recommending a new single terminal.

After the release of ATAG's Final Report, KCAD and the airlines serving KCI initiated the Exhibit K Agreement that defined a process to more fully explore alternatives. The Exhibit K process included a detailed alternatives analysis. During the April 26, 2016 presentation at City Council, the airlines agreed to the Exhibit K recommendation of designing and building a new single consolidated terminal complex. On November 7, 2017, Kansas City, Missouri residents voted (with 75% of the vote) in favor of building a new single terminal at KCI and demolishing existing terminals as necessary.

As described in Section 2.4 of the Final EA, the following alternatives were considered:

- **Alternative 1 - No Action:** No changes would be made from the existing conditions and the terminals would remain as they are today. Terminal A would remain de-activated and operations would continue at Terminals B and C.
- **Alternative 2 - Renovate the Existing Terminals with Two New Central Processors for Terminals A and B:** Alternative 2 would reuse two of the existing terminals, Terminals A and B, and reuse existing spaces within the existing building footprints. This alternative would result in the de-activation and ultimate demolition of Terminal C.

- **Alternative 3 - Renovate the Existing Terminals with One New Central Processor for Terminals A and B:** Alternative 3 would reuse two of the existing terminals, Terminals A and B and would reuse existing spaces within the existing building footprints. Terminals A and B would be renovated with one new central processor serving both of the terminals. This alternative would result in the de-activation and ultimate demolition of Terminal C.
- **Alternative 4 – New Replacement Terminal at Site A (Preferred Alternative):** Alternative 4 provides for the replacement of the three existing terminals into one new replacement terminal at Site A. This site is located in the central terminal area at the location of the existing Terminal A site and would require the demolition of Terminal A. Currently Terminal A is not being used for aircraft operations or for passenger operations. This alternative allows for the continuation of airport operations at Terminals B and C while the replacement terminal is being built. Terminals B and C would be demolished after operations were transferred to the replacement terminal.
- **Alternative 5 – New Replacement Terminal at Site C/D:** Alternative 5 provides for the replacement of the three existing terminals into one new replacement terminal at Site C/D. This site is located in the central terminal area at the location of the existing Terminal C site and the undeveloped Terminal D location and would require the demolition of Terminal C. Terminals A and B would be demolished after operations were transferred to the replacement terminal.
- **Alternative 6: New Replacement Terminal at South Site:** Alternative 6 provides for the replacement of the three existing terminals into one new replacement terminal at a greenfield site located south of the existing terminal complex. Terminals A, B, and C would be demolished after operations were transferred to the replacement terminal.

As discussed in Section 2.3 of the final EA, a two-step screening process was used to identify a range of reasonable alternatives responsive to the Purpose and Need. The first step in this screening process was to determine if an alternative could address the Purpose and Need by providing a better customer experience and ensure continued safe, secure, and efficient airport operations by providing space for current and potential future demand while avoiding duplication of services and systems. The second step of the screening process considered whether the alternative was practical or feasible to implement from an economic and constructability standpoint. If an alternative advanced through both steps, it was retained for a more detailed environmental evaluation in the EA.

As described in Section 2.5 of the Final EA, Alternatives 1, 2, and 3 do not meet the stated Purpose and Need as they would not provide a better customer experience or ensure continued safe, secure, and efficient airport operations by providing space for current and potential future demand while avoiding duplication of services and systems.

As described in Section 2.6 of the Final EA, Alternatives 5 and 6 meet the Purpose and Need, however, they are not practical or feasible to implement from a constructability and economic standpoint.

As stated in Section 2.4 and 2.5 of the Final EA, Alternative 4 meets the Purpose and Need by providing a better customer experience; ensuring continued safe, secure, and efficient airport operations by providing space for current and potential future demand; and eliminating the duplication of systems and services. This alternative is also practical and feasible to implement because it allows uninterrupted operations during construction of the replacement alternative and it is in close proximity to the longest and most heavily used runway and supporting facilities. Therefore, this alternative was retained for further environmental evaluation.

The No Action alternative does not meet the project Purpose and Need. However, to satisfy the intent of NEPA, FAA Order 5050.4B (*NEPA Implementing Instructions for Airport Actions*), FAA Order 1050.1F (*Environmental Impacts: Policies and Procedures*), and other special purpose environmental laws, the No Action Alternative was retained for further environmental evaluation and does serve as a baseline for a comparison of impacts to the Proposed Action.

### **ASSESSMENT AND MITIGATION:**

Chapter 3 of the Final EA addresses the applicable environmental impact areas in accordance with FAA Orders 1050.1F and 5050.4B and analyzes the potential for significant impacts. The Final EA was reviewed by the FAA to determine if it adequately described the potential impacts of the Proposed Action and whether any of the affected impact categories exceeded an established threshold of significance. The FAA determined that the Final EA adequately described the potential impacts of the Proposed Action Alternative.

The KCAD's Proposed Action will not significantly affect environmental resources as discussed and analyzed in the Final EA, which contains detailed discussions, analyses, and conceptual mitigation measures of all affected impact categories. Statements of consistency with community planning from state and local governments are highlighted in the Final EA.

Two study areas were defined, the General Study Area and the Detailed Study Area. The General Study Area depicts the areas surrounding the Airport and covers approximately 7,040 acres. The more refined Detailed Study Area covers approximately 700 acres and depicts the area that may be physically disturbed (direct impacts) with the development of the Proposed Action and its alternatives. Both study areas are shown on Exhibit 3-1 in the Final EA.

FAA examined the following environmental impact categories: Air Quality; Biological Resources; Climate; Department of Transportation Act, Section 4(f) and Land and Water



Conservation Fund (LWCF) Act, Section 6(f) Resources; Hazardous Materials, Solid Waste, and Pollution Prevention; Historic, Architectural, Archeological or Cultural Resources; Land Use; Natural Resources and Energy Supply; Noise and Compatible Land Use; Socioeconomic, Environmental Justice, and Children's Environmental Health and Safety Risks; Visual Effects; Water Resources; Construction Impacts; and Cumulative Impacts. Impacts in these categories are described in detail in Chapter 3 of the Final EA and summarized below.

Mitigation measures that would be a condition of FAA's approval of the Proposed Action are specifically identified below. KCAD should comply with any applicable Federal, state or local requirements during implementation of the Proposed Action.

**Resources Not Affected:** Section 3.3 of the Final EA discloses that the following environmental impact categories were not evaluated further because the resources do not occur in the Study Area:

- Coastal Resources
- Prime and Unique Farmlands, and
- Wild and Scenic Rivers.

**Air Quality:** Sections 3.5 and 3.17.1 of the Final EA describe the air quality analysis that was conducted. This air quality analysis included preparation of emission inventories that were used to meet the requirements of the general conformity analysis under the Clean Air Act and to assess the potential impacts of the proposed action under NEPA. As stated in FAA Order 1050.1F, Exhibit 4-1, the FAA's significance threshold for air quality is whether the action would cause pollutant concentrations to exceed one or more of the National Ambient Air Quality Standards (NAAQS) or to increase the frequency or severity of any such existing violations.

The analysis in Section 3.5 shows that the Proposed Action would not cause an increase above the applicable federal *de minimis* thresholds. Further, the Proposed Action would actually result in a decrease of emissions as compared to the No Action Alternative. During construction, the Proposed Action would have temporary construction-related impacts, however those impacts would not cause an increase above the applicable federal *de minimis* thresholds. Thus, these temporary construction impacts would not result in significant construction impacts relative to air quality. Therefore, there are no significant air quality impacts for the proposed action.

Section 3.17.1 of the Final EA states that KCAD would implement best management practices to reduce fugitive dust emissions.

The Proposed Action conforms to the State Implementation Plan and meets applicable requirements under the Clean Air Act. The Proposed Action would not create any new violation of the National Primary and Secondary Ambient Air Quality Standards (NAAQS), delay the attainment of any NAAQS, nor increase the frequency or severity of

any existing violations of the NAAQS. As a result, no adverse impact on local or regional air quality is expected due to the Proposed Action.

**Biological Resources:** Section 3.6 of the Final EA describes the analysis of biological resources. As stated in FAA Order 1050.1F, Exhibit 4-1, a significant impact in this category would result if there were a determination that the action would likely jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat.

Impacts to these resources were assessed within the Detailed Study Area (see Exhibit 3-1 of the Final EA). The Detailed Study Area consists primarily of developed/industrial area currently used for airport operations. Scoping letters were sent to the Missouri Department of Conservation and the USFWS. No response was received from the Missouri Department of Conservation. The USFWS responded that there would not be any impacts to federally listed species based on the Proposed Action's footprint.

Under the No Action Alternative, the existing conditions at KCI would remain in place, therefore, there would be no development that would cause impacts to this resource. Because the Detailed Study Area is already being used for airport operations and lacks potential habitat, the Proposed Action would not affect any federal or state listed species or any potential habitat for these species. Therefore, there are no significant impacts due to the Proposed Action. Please see Section 3.6 of the Final EA for further information.

**Climate:** Section 3.7 of the Final EA states that FAA has not identified specific factors to consider in making a significance determination for GHG emissions nor has it established a significance threshold. To assess potential impacts, FAA prepared an emissions inventory of GHG emissions comparing the Proposed Action to the No Action Alternative. The emissions inventory is included in Table 3-3 of the Final EA. FAA also prepared an emissions inventory of GHG emissions due to construction and demolition activities of the Proposed Action. The Construction GHG emissions inventory is included in Section 3.17.2 of the Final EA.

Based on the analysis, after implementation the Proposed Action would not result in an increase of GHG emissions and actually would result in a minimal decrease in GHG emissions as compared to the No Action Alternative. Accordingly, the Proposed Action would not have an adverse impact to the climate as compared to the No Action Alternative.

**Department of Transportation Act, Section 4(f) and Land and Water Conservation Fund (LWCF) Act, Section 6(f) Resources:** Section 3.8 of the Final EA describes the impacts for both the No Action and the Proposed Action Alternatives. In addition, FAA developed a Draft Section 4(f) Statement that was made available for public comment

between September 10, 2018 and October 10, 2018. The Final 4(f) Statement is included in Appendix G of the Final EA.

As stated in Exhibit 4-1 of FAA Order 1050.1F and Paragraph 5.3.7 of the 1050.1F Desk Reference, a significant impact would occur when the action involves more than a minimal physical use of a Section 4(f) resource. A significant impact would not occur if mitigation measures eliminate or reduce the effects of a use below the threshold of significance.

The FAA has determined that the Kansas City International Airport is eligible for inclusion in the National Register of Historic Places (NRHP) as a historic district and therefore would be considered a Section 4(f) resource. There are no public parks, recreation facilities, or wildlife or waterfowl refuges that are protected under Section 4(f) located within the Detailed Study Area. In addition, there are no resources protected under Section 6(f) of the LWCF Act located within the Detailed Study Area.

Under the No Action Alternative, there would be no development that would cause physical or constructive use to a Section 4(f) resource or to a LWCF Act Section 6(f) resource.

With the demolition of Terminals A, B, and C, the Proposed Action would constitute a physical “use” of part of the National Register-eligible KCI Historic District, which is a Section 4(f) resource. FAA also determined that the Proposed Action would not result in a constructive use of any Section 4(f) resources (see Section 3.8 of the Final EA).

Where an action would involve the use of a Section 4(f) property, Section 4(f) requires that prior to approving the action, the FAA must determine that there is no feasible or prudent alternative that would avoid the use of the Section 4(f) property and that the project includes all possible planning to minimize harm resulting from the use. As defined in 23 CFR § 774.17,<sup>1</sup> “all possible planning” means that all reasonable measures to minimize harm or mitigate adverse impacts must be included in the project. With regard to historic sites, this means the measures as agreed to by the FAA and the SHPO in accordance with the consultation process under the regulations implementing Section 106 of the National Historic Preservation Act (Section 106). As the Proposed Action would involve a use, a separate Section 4(f) evaluation was prepared, see Final EA Appendix G.

The FAA determined that there are no alternatives that address the Purpose and Need of the project and are both prudent and feasible. The FAA has consulted with KCAD, the SHPO, the Kaw Nation, the Osage Nation, the Pawnee Nation, and the Ponca Tribe of Oklahoma under Section 106 to develop a Programmatic Agreement (PA). The PA outlines the mitigation measures needed to resolve adverse effects of the Proposed Action on the National Register-eligible Kansas City International Airport Historic District. Execution of the PA and implementation of its terms would fulfill the Section 4(f) requirement that the

---

<sup>1</sup> These regulations, issued by the Federal Highway Administration, Federal Transit Administration, and Federal Railroad Administration, are not binding on the FAA but may be used as guidance to the extent relevant.

project include all possible planning to minimize harm and reduce the effects of the use of the Section 4(f) resource below the threshold of significance. Execution of the PA and implementation of its terms is a requirement of the Proposed Action. Therefore the Proposed Action will not result in a significant impact.

The U.S. Department of the Interior concurred with the FAA's determination.

**Hazardous Materials, Solid Waste, and Pollution Prevention:** Sections 3.9 and 3.17.4 of the Final EA describe the impacts for both the No Action and the Proposed Action Alternatives. FAA Order 1050.1F Exhibit 4-1 indicates that FAA has not established a significance threshold for this impact category.

With the No Action Alternative, the existing conditions at KCI would remain in place. Therefore, there would be no hazardous materials or solid waste impacts not already occurring or expected to occur.

Under the Proposed Action, there is a potential for encountering hazardous materials. Past reports indicate the potential for asbestos-containing materials in concrete masonry block walls, and within insulation in certain stairwells and elevator shafts within the existing Terminals A, B, and C. In addition, design of the Proposed Action may require the removal and/or the relocation of existing fuel tanks and underground fuel lines. During the removal or relocation, it is possible that unknown fuel spills and hazardous soils may be encountered. These materials are not considered to be uncommon and disposal practices exist to handle and dispose of the materials safely. According to Section 3.17.4 of the Final EA, if any materials or contaminated soils are encountered during construction, KCAD would follow appropriate materials management measures to manage and dispose of hazardous and non-hazardous substances. Further, during the final demolition phase, KCAD would take steps to ensure that activities would be conducted with regard to worker safety and according to all applicable federal, state, and local regulations. As described in Section 3.9.2.2 of the Final EA, no significant impacts related to hazardous waste would occur as a result of the Proposed Action.

The Proposed Action would create a temporary increase in solid waste generated during operation and construction of the Proposed Action. However, the Proposed Action would neither generate an unmanageable volume of solid waste nor affect the Airport's existing solid waste management program. Section 3.9.2.2 states that KCI is strongly committed to sustainability practices and would seek to recycle as much material as practicable. The increase in solid waste produced by the Proposed Action would not exceed the capability of the waste management system currently in place.

As stated in Section 3.9.1.3 of the Final EA, KCI and its tenants implement pollution prevention measures specific to their operations and material storage areas in accordance with the requirements of their respective Storm Water Pollution Prevention Plans (SWPPPs) and Spill Prevention, Control, and Countermeasure (SPCC) Plans. Although the Proposed Action may result in additional impervious surface, the storm water collection system improvements included in the Proposed Action are being developed to

increase the collection of deicing fluid. According to the Final EA, any runoff would be discharged in accordance with the requirements off the applicable National Pollutant Discharge Elimination System (NPDES) permit. KCAD would update its SWPPP and SPCC Plan to reflect facility changes and maintain compliance with applicable regulatory requirements. In addition, as stated in the Final EA, best management practices (BMPs) would be employed during construction to limit runoff and erosion.

For these reasons, significant impacts in this category due to the Proposed Action are not anticipated.

**Historic, Architectural, Archeological or Cultural Resources:** Sections 3.10 and 3.17.5 and Appendix C of the Final EA describe FAA's evaluation of the direct and indirect impacts from federal actions on historic, architectural, archaeological, and other cultural resources under Section 106, the principal statute concerning such resources. Section 106 requires federal agencies to take into account the effects of their undertakings on properties that are listed in or determined eligible for inclusion in the National Register of Historic Places (NRHP), and to consult with the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officers (THPO), and other parties to develop and evaluate alternatives or modifications to the undertaking where necessary to avoid, minimize, or mitigate adverse effects on historic properties. The independent federal agency overseeing federal historic preservation and tribal programs, the Advisory Council on Historic Preservation (ACHP), must be afforded a reasonable opportunity to comment on such undertakings subject to Section 106.

Exhibit 4-1 of FAA Order 1050.1F provides that the FAA has not established a significance threshold for Historical, Architectural, and Cultural Resources. A factor to consider is whether the action would result in a finding of adverse effect through the Section 106 process; however, an adverse effect finding is not automatically a significant impact triggering preparation of an EIS.

For this analysis, FAA established both a Direct and an Indirect Area of Potential Effect (APE). These are shown on Exhibit 3-2 of the Final EA. In order to identify historic properties within the APEs, previous archeological and cultural resources surveys conducted for the Airport were reviewed. For more information please see Section 3.10.1.2 of the Final EA. To gather additional information regarding the Direct APE, an archeological survey was completed in June 2018 and an architectural and historic properties survey was completed in October 2018.

With the No Action Alternative, no changes would be made from the existing conditions and the terminals would remain as they are today. Therefore, no impacts to historical, architectural, archeological, or cultural resources would occur.

The FAA, after review of the October 2018 survey and input from the SHPO, determined, and the SHPO concurred, that the KCI Airport is eligible for the NRHP as a historic district. Under the Proposed Action, with the proposed demolition of Terminals A, B, and C and construction of a new terminal building with associated development, the undertaking

would constitute an adverse effect to the historic district. The SHPO has concurred with this adverse effect determination. See Section 3.10.2.2 of the Final EA.

The June 2018 survey found no archeological resources or cultural resources within the Direct APE. However, since there is always the potential for discoveries of unknown archeological and/or cultural resources, the survey recommended an unanticipated discoveries plan and archeological monitoring during construction.

Several historic properties are located within the Indirect APE. None of the properties are eligible for listing on the NRHP except for site 23PL1507. Indirect impacts may include noise, vibration, or visual intrusions. As described in Section 3.10.2.2 of the Final EA, FAA determined that there would be no indirect impacts due to the Proposed Action on site 23 PL1507. The FAA determined, and the SHPO concurred, that there would be “no adverse effect” on any historical, architectural, archaeological, or cultural resources located in the Indirect APE.

To mitigate the adverse effect to the potential historic district and taking into consideration the potential for discoveries of unknown archeological and/or cultural resources, the FAA, KCAD, SHPO, Kaw Nation, Osage Nation, Pawnee Nation, and the Ponca Tribe of Oklahoma engaged in consultation and developed a Programmatic Agreement (PA) under Section 106 of the National Historic Preservation Act. A copy of the executed PA is included in Appendix C of the Final EA.

The mitigation measures (stipulations) of the PA are a requirement of the Proposed Action. As stated in the PA, execution of the PA and implementation of its terms evidences that the FAA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

Although the Proposed Action will result in an adverse effect, mitigation measures in the Programmatic Agreement are intended to resolve adverse effects. Through implementation of these measures, impacts will be mitigated below the level of significance and therefore the Proposed Action would not result in a significant impact to this category of resources under NEPA.

The mitigation measures in the PA include:

1. Develop a plan for construction monitoring. KCAD will have a professional archaeologist who meets the Secretary of Interior’s Professional Qualification Standards present to conduct construction monitoring during certain ground disturbing activities associated with the Proposed Action. Monitoring is defined as active observation of earth-moving or other work that could adversely affect unknown cultural resources within the Direct APE.
2. Develop a plan for unanticipated discoveries of cultural resources sites and artifacts in the event that previously unidentified resources are discovered during ground disturbing activities.

3. Develop a plan for Inadvertent Discoveries of Human Remains, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony in the event that previously unidentified resources are discovered during ground disturbing activities.
4. Develop a plan to prepare a photographic record of Terminal A. The views of the photographs would include general environment, front facade, front and rear perspective views, typical windows, and exterior and interior views. The photographs would provide a permanent record of Terminal A.
5. Develop a plan to provide additional mitigation measures to resolve the adverse effects on the potential historic district. It is important to involve the public in the development of meaningful mitigation projects and to afford community leaders and stakeholders the opportunity to collaborate with the City and help select the mitigation projects that are the most meaningful to the Kansas City community. This mitigation measure provides for the procedures for selection of the community members and the process to determine additional appropriate additional mitigation to resolve the adverse effects on the potential district and the approval of those additional measures.

**Land Use:** Section 3.11 of the Final EA describes the impacts for both the No Action and the Proposed Action Alternatives. The FAA has not established a significance threshold for land use, and the FAA has not provided specific factors to consider in making a significance determination. The determination that significant impacts exist in the land use impact category is normally dependent on the significance of other impact categories.

The existing land uses within the General Study Area are primarily made up of Airport property consisting of vacant/open land. The existing land uses within the Detailed Study Area are made up of developed land used for Airport operations.

Section 3.11.2.1 of the Final EA states with the No Action Alternative, the existing conditions at KCI would remain in place and there would be no impacts to land use not already occurring or expected to occur. Section 3.11.2.2 of the Final EA states the Proposed Action would occur entirely on KCAD property and would not change the current land use designation of the Airport. The Sponsor Land Use Letter provided in Appendix D of the EA states “that appropriate action, including the adoption of zoning laws, has been or will be taken, to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including the landing and takeoff of aircraft. This assurance applies to both existing and planned land uses.” For these reasons, the Proposed Action would be compatible with existing and expected zoning and surrounding area land use plans and no significant impacts are anticipated.

**Natural Resources and Energy Supply:** Sections 3.12 and 3.17.6 of the Final EA describe the impacts for both the No Action and the Proposed Action Alternatives. The FAA has not established a significance threshold for natural resources and energy supply; however, situations should be considered where the proposed action or alternative(s) would have the potential to cause demand to exceed available or future supplies of these resources. As stated in Section 3.12 the Final EA, the No Action Alternative would not increase demand for electricity, natural gas, or water or wastewater. The Proposed Action would not consume a notable quantity of natural resources, nor would it exceed local supplies for fuel and energy. In addition, many of the proposed new facilities and utilities would replace older, less efficient facilities, which would achieve a reduction in energy use and potentially even water usage. Therefore, no significant impacts to natural resources or the local energy supply would occur as a result of the Proposed Action.

As stated in Section 3.17.6 of the Final EA regarding construction impacts, as a result of implementing the Proposed Action, proposed construction activities would require the use of typical construction materials such as wood, metal, sand, gravel, concrete, dirt for fill material, glass, water, and asphalt. These materials are not in short supply in the Kansas City area and construction of the Proposed Action would not exceed the available supply of these materials.

**Noise and Noise-Compatible Land Use:** As stated in Sections 3.13 and 3.17.3 of the Final EA, a noise analysis was conducted on the impact of airport-related noise levels upon surrounding noise-sensitive land uses located within the noise contours for the No Action Alternative and the Proposed Action. The operational impact analysis was prepared for the year of anticipated project implementation (2022) and five (2027) years after implementation. A significant noise impact would occur if the analysis shows that the Proposed Action would result in noise-sensitive areas experiencing an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase when compared to the No Action alternative for the same timeframe.

As stated in Section 3.13.2.6, no new noise sensitive land uses would be subject to noise levels of DNL 65 dB or greater due to an increase in noise of DNL 1.5dB or greater when compared to the No Action alternative for the same timeframe. Further, no existing noise sensitive land uses within the DNL 65 dB would be subject to an increase in noise of DNL 1.5 dB or greater. Therefore, no significant aircraft noise impacts would occur as a result of the Proposed Action

As stated in Section 3.13, the FAA uses 14 CFR Part 150, Airport Noise Compatibility Planning, land use compatibility guidelines to determine compatibility with most land uses. Generally, all land uses exposed to noise levels below the DNL 65 db noise contour are considered compatible.



As stated in Section 3.13.2.6, there are no residences, public schools, nursing homes, hospitals, libraries, religious institutions, or other noise sensitive land uses within any of the Future 2022 and 2027 Proposed Action contours. Therefore, there are no new non-compatible land uses due to the proposed action.

As stated in Section 3.17.3 of the Final EA, the potential for noise impacts due to construction are not anticipated to be long-term or introduce a significant change to noise sensitive facilities. During construction of the Proposed Action, it is anticipated that all three runways would remain operational throughout the entire construction period. If however, during construction, the primary runway, Runway 1L/19R would need to be closed it could introduce aircraft overflights and potential noise impacts to areas around the Airport. A construction noise analysis was completed to show a worst-case scenario. See the Final EA, Exhibit 3-14. It was assumed that Runway 1L/19R was closed and that 70% of the total aircraft operations operated on Runway 1R/19L and 30% of the total aircraft operations operated on Runway 9/27 due to the proximity to existing Terminals B and C. In this worst-case scenario one church, the Rock of KC, located north of I-435 would experience a DNL 1.5 dB change, which would bring it within the DNL 65 dB. Again, it is expected that all three runways would remain operational throughout the entire construction period and any potential impacts would be temporary in nature, so no mitigation is required.

**Socioeconomic, Environmental Justice, and Children’s Environmental Health and Safety Risks:**

**Socioeconomic:** Section 3.14.1 of the Final EA describes how socioeconomic impacts were assessed to determine the effect that the proposed airport development would have on the social and economic fabric of the surrounding communities.

The FAA has not established a significance threshold for socioeconomics. However considerations include extensive relocation of housing or businesses; inducing substantial economic growth in an area; disruption of local traffic patterns and substantial reduction of the level of service of roads serving an airport; or substantially changes the community tax base (See Exhibit 4-1 of FAA Order 1050.1F).

With the No Action Alternative, the Final EA states that the existing conditions at KCI would remain in place.

The Proposed Action, as stated in Section 3.14.1.2 of the Final EA, would not result in the acquisition or the conversion of residential properties to Airport property. Therefore, no impacts to socioeconomic resources would occur as a result of relocation of residences.

The construction and operation of the Proposed Action would not result in significant adverse impacts to businesses located on or off-Airport. The Proposed Action has the potential to benefit the local economy in the short-term with local jobs through temporary

construction-based employment, which would provide an increase in local employment taxes, and induced local spending in the surrounding communities.

As stated in the Final EA, there are no proposed modifications to off Airport roadways and there is no anticipated increase in surface traffic other than a temporary increase during construction. There would be no reduction in the level of service for the roads serving the Airport and surrounding communities. Therefore, there would be no significant disruption of local traffic patterns as a result of the Proposed Action.

As stated in Section 3.14.1.1, KCAD is an enterprise fund department of the City and is supported wholly by airport user charges and other airport revenues. No general tax fund revenues are used for the administration, promotion, operation or maintenance of KCI. Therefore, there would be no substantial change in the community tax base as a result of the Proposed Action.

For these reasons, the Proposed Action is not anticipated to result in a significant socioeconomic impact.

Environmental Justice: As stated in Section 3.14.2.2 of the Final EA, there are no environmental justice populations living within the General Study Area. Since there would be no significant impacts to any of the environmental impact categories and there are no environmental justice populations living in the General Study Area, the Proposed Action would not result in a disproportionately high and adverse impact on any minority or low income populations within the General Study Area.

Children's Environmental Health and Safety Risks: Section 3.14.3 of the Final EA describes the analysis of potential children's environmental health and safety risks. FAA has not established a significance threshold for this category of impacts, but factors to consider include whether the action would have the potential to lead to a disproportionate health or safety risk to children.

With the No Action Alternative, the Final EA states that the existing conditions at KCI would remain in place therefore there would be no risks in this area not already occurring or expected to occur.

As stated in the Final EA, the Proposed Action would not result in the release of or exposure to significant levels of harmful agents in the water, air, or soil that would affect children's health or safety. Based on a review of available data conducted as part of this EA, the Proposed Action would not result in an elevated risk related to health or safety concerns for children. Therefore, no significant impacts would occur as a result of the Proposed Action

Visual Effects: Section 3.15 of the Final EA describes the analysis of the potential visual effects (i.e., light emissions and visual character) of the No Action Alternative and

Proposed Action. The FAA has not established a significance threshold for Light Emissions or for Visual Character. FAA Order 1050.1F, Exhibit 4-1.

Light Emissions: As described in the Final EA, it is anticipated that the proposed replacement terminal would be illuminated by the same basic types of lighting currently used on the existing terminals. Therefore, lighting from the Proposed Action when compared to the No Action Alternative would not significantly increase the overall light emissions due to their type, intensity, and distance from residential areas.

Visual Character: As stated in Section 3.15.2.2 of the Final EA, the design of the proposed new terminal building is anticipated to be relatively low profile as to not obstruct the view from the existing Air Traffic Control Tower. Since the proposed terminal building would have a relatively low profile, the Proposed Action would not include any significant vertical development compared to the No Action Alternative that would significantly alter, contrast, or obstruct the existing views from residential areas due to the distance and the obstacles in the way. Therefore, no noticeable change to the visual resources and visual character would occur to nearby residents.

For these reasons, the Proposed Action would not result in a significant impact to either light emissions or visual character.

Water Resources: Sections 3.16 and 3.17.7 of the Final EA describe the analysis of the potential impacts to water resources (i.e., wetlands, floodplains, and surface and ground water) of the No Action Alternative and Proposed Action.

Wetlands: Section 3.16.1 of the Final EA describes the analysis of wetlands and waters of the United States. Exhibit 4-1 of FAA Order 1050.1F provides the significance thresholds for this category of impacts. Considerations include where the action would adversely affect a wetland's function, substantially alter the hydrology, or substantially reduce the wetland's ability to retain floodwaters.

With the No Action Alternative, the existing conditions at KCI would be in place and therefore there would be no impacts to wetlands or streams not already occurring or expected to occur.

Exhibit 3-12 of the Final EA identifies the wetlands and surface waters in the Detailed Study Area. Section 3.16.1.2 of the Final EA describes that a scoping letter was sent to the U.S. Army Corps of Engineers (USACE) and USACE attended the scoping meeting on March 15, 2018. USACE requested clarification on the difference between the baseline and future no action cases to be analyzed in the EA. No further letters, comments, or responses were received from the USACE.

As stated in the Final EA, information from the National Wetland Inventory Map was obtained to determine the location of jurisdictional waters of the U.S. These waters were originally natural water features but were expanded for manmade storm water drainage

areas when the existing terminals were constructed in the late 1960's. The Proposed Action would be designed to avoid these manmade storm water drainage areas. During construction, these areas would also be avoided to the extent practicable and any potential impact would be minimized through the use of BMPs. Therefore, because the Proposed Action will avoid the wetland areas and BMPs would be employed during construction, the Proposed Action would have no significant impact to wetlands.

Floodplains: Section 3.16.2 of the Final EA provides the analysis of potential floodplain impacts. Exhibit 4-1 of FAA Order 1050.1F indicates that a significant impact in this category would occur when the action would cause adverse impacts on natural and beneficial floodplain values. As shown in Exhibit 3-13, portions of the Direct Study Area are within the 100-year floodplain. However, as described in Section 3.16.2.2, no development is planned within the floodplain and no impacts will occur under both the No Action Alternative and Proposed Action. As stated in the Final EA, the floodplain would be avoided during construction and BMPs would be employed to limit runoff and erosion to ensure there would be no direct impacts to the floodplain due to the Proposed Action. Additional impervious surface may result from the Proposed Action. However, the storm water collection system improvements contained within the Proposed Action, including improved glycol recovery system and facilities, would be implemented to offset the increase in impervious surfaces. For these reasons, the Proposed Action would not have a significant impact on floodplains.

Surface and Ground Water: Section 3.16.3 of the Final EA provides the analysis of potential surface water impacts. Exhibit 4-1 of FAA Order 1050.1F indicates that a significant impact in this category would occur when the action would exceed water quality standards or contaminate public water supplies such that public health may be adversely affected. As shown in Exhibit 3-13, Hayes Creek is in the Detailed Study Area. As stated in the Final EA, with the No Action Alternative, the existing conditions at KCI would remain in place. With the Proposed Action, Hayes Creek would be avoided during construction and BMPs would be employed to limit runoff and erosion to ensure there would be no direct significant impacts to surface waters due to the Proposed Action. In addition, the storm water collection system improvements contained within the Proposed Action, including improved glycol recovery system and facilities, are being developed to increase the collection of deicing fluid and ensure the Airport operates in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit number MO-0114812 issued by the Missouri Department of Natural Resources (MDNR). For these reasons, as stated in the EA, the Proposed Action would not have a significant impact on surface waters.

Section 3.16.4 of the Final EA provides the analysis of potential groundwater impacts. As shown in Exhibit 3-13, portions of the Direct Study Area are within the 100-year floodplain. As stated in the Final EA, there are no public or private drinking water wells or wells used for agricultural purposes within a 1.5-mile radius of the Detailed Study Area. There are no sole source aquifers in the Detailed Study Area. With the No Action Alternative, the existing conditions at KCI would remain in place. With the Proposed Action, construction and operation of the proposed development would abide by all

applicable regulations related to spill prevention and control regulations to prevent spills from causing significant adverse impacts to groundwater. As stated in the Final EA, the Proposed Action would not be anticipated to have a significant impact on groundwater.

**Construction Impacts:** Temporary environmental impacts may occur as a result of construction activities. Areas of temporary impacts include: Air Quality; Climate; Noise and Noise-Compatible Land Use; Hazardous and Solid Waste; Historical, Architectural, Archeological, and Cultural Resources; Natural Resources, and Water Resources. Potential impacts are described above in the applicable resource category.

Project design specifications will incorporate recommendations established in FAA Advisory Circular 150/5370-10, Standards for Specifying Construction of Airports, Item P-156, Temporary Air and Water Pollution, Soil Erosion and Siltation Control to help minimize construction impacts using BMPs.

**Cumulative Impacts:** The past, present, and reasonably foreseeable future actions included in the cumulative impact analysis are presented in Section 3.18 of the Final EA. Table 3-6 provides the list of the actions assessed between 2013 through 2024. Section 3.18 of the Final EA discusses the evaluation of cumulative impacts from these actions that could result in environmental impacts from implementation of the Proposed Action.

As stated in Table 3-7, with the No Action Alternative, there would be no cumulative impacts. Under the No Action Alternative, KCAD would not implement the proposed replacement terminal project. KCAD would continue to operate the Airport and serve forecast aviation demands. Airport development would be subject to review and approval under NEPA and is not assumed under this alternative. Therefore, the No Action Alternative would not cause cumulative impacts when considered with past, present, and reasonably foreseeable future projects.

With implementation of the Proposed Action, the level of cumulative impacts anticipated to occur within these environmental resource categories is not significant due to: the types of past, present, and reasonably foreseeable future projects; the extent of the built environment in which they would occur; the lack of certain environmental resources in the area; and the mitigation measures identified for the Proposed Action. Therefore, as stated in the Final EA, implementation of the Proposed Action would not result in significant cumulative environmental impacts.

### **ENVIRONMENTALLY PREFERRED ALTERNATIVE AND FAA PREFERRED ALTERNATIVE:**

Based on the analysis of environmental impact in the Final EA, the No Action Alternative has fewer environmental effects than the Proposed Action Alternative and thus would be the environmentally preferred alternative. In addition to identifying the

environmentally preferred alternative, the FAA also identifies the FAA preferred alternative. In selecting the agency's preferred alternative, the FAA considers a variety of factors, including the ability of the alternatives to satisfy the Purpose and Need of the project as well as environmental impacts of the alternatives examined in the EA. Although the No Action Alternative entails fewer environmental impacts, the Proposed Action Alternative incorporates design elements and construction practices to reduce environmental impacts. Furthermore, after mitigation, there are no significant impacts associated with the Proposed Action Alternative. Finally, the Proposed Action Alternative fully satisfies the Purpose and Need for the project. Because the No Action Alternative does not meet the Purpose and Need for the proposed project, and because the Proposed Action Alternative is designed to minimize environmental effects, the FAA's preferred alternative is the Proposed Action Alternative.

### **AGENCY COORDINATION AND PUBLIC OUTREACH:**

**Agency and Public Scoping:** Section 4.1 of the Final EA discusses the agency and public scoping for the environmental assessment. On March 15, 2018, a governmental agency meeting and a public scoping meeting were completed to determine the range of issues to be analyzed and to what magnitude they were to be treated. Key governmental agencies were invited to attend the Agency Scoping Meeting in Kansas City and to provide any information they wished to be considered in the EA. The public was notified of the public scoping meeting at least 30 days before the scheduled public meeting date in the Kansas City Star newspaper. In addition, the public was also notified of the public scoping meeting online at <http://www.kci-edgemoor.com>. Anyone who had signed up to receive notification through this website was also sent an email notification. A more detailed discussion of agency and public scoping is included in Chapter 4 of the Final EA. A copy of the public scoping meeting newspaper notices, lists of attendees, materials presented at the meeting, and comments received during the scoping process are provided in Appendix A of the Final EA.

**Public Comment Period and Public Workshop and Hearing:** A 30-day Notice of Availability (NOA) announcing the availability of the Draft EA and Section 106 Evaluation and Public Hearing was published in the Kansas City Star. A separate 30-day Notice of Availability (NOA) announcing the availability of the Draft Section 4(f) Statement was published on in the Kansas City Star. Any individual that provided comments during the scoping process was notified by letter of the availability of the Draft EA, Section 106 Evaluation and Section 4(f) Statement. The draft documents were made available to the public online at <http://FLYKCI.com> and at <http://www.kci-edgemoor.com>. In addition, a paper copy of the Draft EA and Section 106 Evaluation and the Section 4(f) Statement were available for public review at three local libraries, the Aviation Department, and the FAA Regional Office. The comment period for the draft EA and Section 106 Evaluation was open from August 23, 2018 to October 2, 2018. The comment period for the draft Section 4(f) Statement was open from September 10, 2018 to October 10, 2018. More information can be found in Chapter 4 of the Final EA.

A public workshop and hearing was conducted on September 24, 2018 to offer the public the opportunity to provide comments on the information contained in the Drafts. A copy of the workshop and hearing newspaper notices, lists of attendees, and materials presented are provided in Appendix A of the Final EA.

All comments received and the responses to the comments on the Draft EA and Section 106 Evaluation are found in Appendix H of the Final EA. FAA did not receive any comments specifically on the Draft Section 4(f) Statement.

#### **INTER-AGENCY COORDINATION:**

In accordance with 49 USC§ 47101 (h), the FAA has determined that no further coordination with the U.S. Department of Interior or the U.S. Environmental Protection Agency is necessary because the Proposed Action does not involve construction of a new airport, new runway or major runway extension that has a significant impact on natural resources including fish and wildlife; natural, scenic, and recreational assets; water and air quality; or another factor affecting the environment.

#### **REASONS FOR DETERMINATION THAT THE PROPOSED ACTION ALTERNATIVE WILL HAVE NO SIGNIFICANT IMPACTS:**

The Final EA examines each of the various environmental resources that were deemed present at the project location, or had the potential to be impacted by the Proposed Action. As described within this FONSI and in the Final EA, the proposed terminal replacement project at KCI would not involve any environmental impacts, after mitigation, that would exceed a threshold of significance as defined by FAA Orders 1050.1F and 5050.4B. The mitigation necessary to support a finding of no significant impact is contained in the PA executed by FAA, KCAD<sup>2</sup>, the SHPO, Osage Nation, Pawnee Nation, and the Ponca Tribe of Oklahoma to address adverse effects to part of the KCI Airport Historic District. The PA is located in Appendix C of the Final EA.

#### **AGENCY FINDINGS:**

The FAA makes the following determinations for this project based on information and analysis set forth in the Final EA and other portions of the project/administrative file.

- **The project is reasonably consistent with existing plans of public agencies for development of the area [49 U.S.C. 47106(a)].** The FAA is satisfied that the Proposed Action is reasonably consistent with the plans, goals, and policies for the area surrounding the airport based on coordination efforts with public agencies as described in Chapter 4 of the Final EA. Further, FAA acknowledges

---

<sup>2</sup> KCAD's signature on the PA reflects its agreement and commitment to implement the terms of the PA. Execution of the PA and implementation of its terms is a requirement of the Proposed Action.

that a project to construct a new passenger terminal at KCI and demolish existing terminals as necessary was approved generally by a majority of the Kansas City, Missouri voters as described in Section 2.2 of the Final EA. The Proposed Action is also consistent with the applicable regulations and policies of federal, State, and local agencies.

- **Independent and Objective Evaluation.** As required by the Council on Environmental Quality (40 CFR § 1506.5), the FAA has independently and objectively evaluated this proposed project. As described in the Final EA, the Proposed Action and the No Action Alternative were studied extensively to determine the potential impacts and appropriate mitigation for those impacts. The FAA provided input, advice, and expertise throughout the analysis, along with administrative and legal review of the project.
- **Community Interests Considered [49 U.S.C. 47106(b)(2)].** The FAA is satisfied that the interests of the communities in or near where the project may be located were given fair consideration. The planning process for the Proposed Action is described in Chapter 2 of the Final EA. Nearby communities and their residents have had the opportunity to express their views during the scoping process, during the Draft EA and Section 106 Evaluation and the Draft Section 4(f) Statement public comment periods, and at a public workshop and hearing. The consideration of those views is included in Appendices A and H of the Final EA.
- **Land Use Restrictions [49 U.S.C. § 47107].** The FAA has received satisfactory assurances from the airport sponsor, included in Appendix D of the Final EA, that appropriate action, including the adoption of zoning laws, has been or will be taken, to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with airport normal operations, including landing and takeoff of aircraft.
- **National Historic Preservation Act, Section 106.** The FAA has determined, and the SHPO has concurred, that the KCI Airport is eligible for the National Register of Historic Places as a Historic District. With the proposed demolition of Terminals A, B, and C and construction of a new terminal building with associated development, the undertaking (Proposed Action) would constitute an adverse effect to part of the historic district. FAA conducted the required consultation with the SHPO and other parties pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. FAA also afforded ACHP a reasonable opportunity to comment on the undertaking. A Programmatic Agreement (PA) executed by the FAA, KCAD, SHPO, Osage Nation, Pawnee



Nation, and the Ponca Tribe of Oklahoma is included in Appendix C of the Final EA. The PA describes the measures needed to mitigate the adverse effect of the Proposed Action on the historic district. Execution of the PA and implementation of its terms evidences that the FAA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment. KCAD's adherence to the stipulations in the PA is a condition of approval of this FONSI/ROD.

- **Department of Transportation Act, Section 4(f) [49 U.S.C. § 303].** The Proposed Action would result in a physical “use” of part of the National Register-eligible KCI Airport historic district, which is a Section 4(f) resource. FAA has determined that there are no alternatives that address the Purpose and Need of the project and are both prudent and feasible. A PA executed by the FAA, KCAD, SHPO, Osage Nation, Pawnee Nation, and the Ponca Tribe of Oklahoma outlines the mitigation measures needed to resolve the adverse effects of the Proposed Action on the KCI Airport historic district. The mitigation measures in the PA are a condition of approval of this FONSI/ROD and address the Section 4(f) requirement that the project include all possible planning to minimize harm to the historic district resulting from the use.
  
- **Avoidance and Minimization.** Based on the information contained in the Final EA, the FAA has determined that all practicable means to avoid or minimize environmental harm from the Proposed Action have been adopted. The proposed Action avoids and minimizes environmental harm in a variety of ways, including: reducing air quality emissions and GHG emissions along with energy and water usage after project construction is complete; recycling as much material as practicable; following all state and local regulations, as well as best management practices during construction activities relating to hazardous materials, solid waste, pollution prevention, fugitive dust, and storm water impacts; avoiding wetlands; and other examples provided throughout the Final EA. Additionally, as stated above, the PA executed by the FAA, KCAD, SHPO, Osage Nation, Pawnee Nation, and the Ponca Tribe of Oklahoma documents that all practicable means to avoid or minimize adverse effects to the historic district, as well as minimize harm due to the use of the historic district, have been adopted.

## **DECISION AND ORDER:**

Based on the information in this FONSI/ROD and supported by detailed discussion in the Final EA, the Proposed Action has been identified as the FAA's selected alternative and the FAA must either:

- Approve agency actions necessary to implement the Proposed Action, or
- Disapprove agency actions to implement the Proposed Action.

Approval signifies that applicable federal requirements relating to the proposed airport development have been met. Approval permits KCAD to proceed with implementation of the Proposed Action and associated mitigation measures. Disapproval would prevent KCAD from implementing the Proposed Action elements within KCI.

Under the authority delegated to me by the Administrator of the Federal Aviation Administration, I find that the project is reasonably supported. I, therefore, direct that action be taken to carry out the agency actions discussed more fully in the "PROPOSED ACTION AND REQUESTED FEDERAL ACTIONS" section of this FONSI/ROD.

- Unconditional approval of the Airport Layout Plan (ALP) to depict the proposed improvements pursuant to 49 USC §§ 40103(b) and 47107(a)(16).
- Determination under 49 USC § 44502(b) that the airport development is reasonably necessary for use in air commerce or in the interests of national defense.
- Approval of a Construction Safety and Phasing Plan to maintain aviation and airfield safety during construction pursuant to FAA Advisory Circular (AC) 150/5370-2F, Operational Safety on Airports During Construction (14 CFR Part 139 [49 USC § 44706]).
- Approval of changes to the airport certification manual pursuant to 14 CFR Part 139 (49 USC § 44706).
- Determinations, through the aeronautical study process, under 14 CFR Part 77, regarding obstructions to navigable airspace (49 USC Section 40103 (b) and 40113).
- Determinations under 49 USC 47106 and 47107 relating to the eligibility of the Proposed Action for federal funding under the Airport Improvement Program (AIP) and/or determinations under 49 USC 40117, as implemented by 14 CFR 158.25, to impose and use passenger facility charges (PFCs) collected at the airport to assist with construction of potentially eligible development items shown on the ALP including the proposed construction of the replacement terminal and associated actions that may directly or indirectly impact FAA facilities including but not limited to utility relocations.

This order is issued under applicable statutory authorities, including 49 U.S.C. §§ 40101(d), 40103(b), 40113(a), 44701, 44706, 44718(b), and 47101 et seq.

**APPROVING FAA OFFICIAL'S STATEMENT OF ENVIRONMENTAL FINDING:**

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action is consistent with existing national environmental policies and objectives as set forth in Section 101 of NEPA and other applicable environmental requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA. As a result, FAA is issuing this FONSI and will not prepare an EIS for this action.

APPROVED: \_\_\_\_\_  
Director, Airports Division Date  
FAA Central Region

DISAPPROVED: \_\_\_\_\_  
Director, Airports Division Date  
FAA Central Region

CONCUR: \_\_\_\_\_  
Regional Administrator Date  
FAA Central Region

***RIGHT OF APPEAL:***

*This decision document (FONSI/ROD) is a final order of the FAA Administrator and is subject to exclusive judicial review under 49 U.S.C. § 46110 by the U.S. Circuit Court of Appeals for the District of Columbia or the U.S. Circuit Court of Appeals for the circuit in which the person contesting the decision lives or has a principal place of business. Any party having substantial interest in this order may apply for review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110.*