THE SECRETARY OF TRANSPORTATION
WASHINGTON, D.C. 20590

September 9, 2010

William E. Reukauf
Associate Special Counsel
U.S. Office of Special Counsel
1730 M Street, NW, Suite 218
Washington, DC 20036

Re: OSC File No. DI-09-2095

Dear Mr. Reukauf:

I am responding to your letter of August 25, 2009, which referred for investigation disclosures from Vincent Sugent, an Air Traffic Control Specialist at the Federal Aviation Administration's (FAA) Detroit Metropolitan Wayne County Airport (DTW) Air Traffic Control Tower. Mr. Sugent alleged that DTW management officials operated an air traffic procedure called the Northeast Flow in an unsafe manner and failed to comply with several procedural and safety requirements prior to its implementation. I delegated investigative responsibility for this matter to the Office of Inspector General (OIG). Enclosed are the OIG's Report of Investigation and FAA Administrator Babbitt's response.

In summary, OIG did not substantiate Mr. Sugent's allegations. Specifically, OIG found DTW no longer operates the Northeast Flow and, during its use in 2007 and 2008, the procedure complied with applicable air traffic regulations. In addition, OIG found that the Wayne County Airport Authority (WCAA) prepared and FAA approved the requisite environmental documents prior to DTW's implementation of the Northeast Flow. The OIG also found that neither a staff study nor the documentation of a formal safety risk assessment was required prior to implementing the Northeast Flow. The OIG further found that WCAA and FAA officials were not only aware of the Northeast Flow prior to its implementation, but worked with DTW officials to inform local residents about the temporary change in air traffic patterns created by the flow. Finally, while there was some confusion regarding a Freedom of Information Act request submitted by Mr. Sugent, FAA officials did not violate any document retention requirements.

I appreciate Mr. Sugent's diligence in raising these concerns.

Sincerely yours,

Ray LaHood

Enclosures

Federal Aviation Administration

Memorandum

Date: AUG 4 2010

To: Mr. Robert Westbrooks, Acting Assistant Inspector General for Special Investigations and Analysis

From: J. Randolph Babbitt, Administrator

Subject: Response to OIG Report of Investigation I09Z000059SINV - Whistleblower Allegations at Detroit Metropolitan Airport (DTW) and Office of Special Counsel (OSC) File DI-09-2095

We are pleased that your investigation found no evidence to substantiate that Detroit Metropolitan Wayne County Airport (DTW) Air Traffic Control Tower (ATCT) management compromised aviation safety as alleged by the whistleblower. Our own investigation found that planning for the new air traffic control configuration that added departure traffic to Runway 9R (the "Northeast Flow") included the required environmental, noise, and safety assessments. In addition, DTW management notified local officials regarding the Northeast Flow, and the Wayne County Airport Authority and the Airport District Office provided support and approvals for this change. DTW management has subsequently removed the Northeast Flow from the local operating procedures, and there are no plans to reinstate this configuration.

It is our judgment that the DTW ATCT management properly handled the planning and implementation of the Northeast Flow procedures originally raised by the whistleblower.

If additional information is needed, please contact Mr. Bob Tarter, Vice President for the Office of Safety for the Air Traffic Organization at (202) 267-3341.

cc: Senior Vice President, Operations, Air Traffic Operations (AJN)
Chief Counsel, Audits & Evaluations (AAE)

Memorandum

U.S. Department of Transportation
Office of the Secretary of Transportation
Office of Inspector General

Subject: ACTION: OIG Investigation #I09Z000059SINV, Re: Air Traffic Management at Detroit Metropolitan Wayne County Airport

Date: July 16, 2010

From: Robert A. Westbrooks
Acting Assistant Inspector General for Special Investigations and Analysis, JI-3

Reply to Attn. of: R. Engler

To: Hank Krakowski
Chief Operating Officer
Air Traffic Organization, AJO-1

This report describes the findings of our investigation of alleged improper air traffic management by officials at Detroit Metropolitan Wayne County Airport (DTW). In August 2009, Vincent M. Sugent, a Federal Aviation Administration (FAA) Air Traffic Controller, reported to the U.S. Office of Special Counsel (OSC) that DTW managers compromised aviation safety and ignored FAA procedures by implementing and conducting an air traffic procedure called the Northeast Flow. OSC referred the matter to the Secretary. The Secretary delegated investigative responsibility to the Office of Inspector General and the FAA's Air Traffic Safety Oversight Service for a joint investigation.

We are required to provide a copy of our Report of Investigation and FAA's response to the Secretary. Please review this report and respond to us in writing by July 30, 2010. Your response must be signed by the Administrator and should include any comments, a statement of corrective action planned or taken as a result of our investigation (if any), and your timeframe for implementation of any planned corrective action. By law, the Secretary is required to report to OSC on our investigation and the agency's corrective action. OSC will review the investigation and corrective action for sufficiency.

If you have any questions or concerns about this report, please contact me at (202) 366-1415, or Director of Special Investigations, Ronald C. Engler, at (202) 366-4189.

U.S. Department of Transportation
Office of Inspector General

REPORT OF INVESTIGATION	INVESTIGATION NUMBER #I09Z000059SINV	DATE July 16, 2010
TITLE Air Traffic Management at Detroit Metropolitan Wayne County Airport	PREPARED BY: Brian Uryga Senior Attorney/Investigator Special Investigations and Analysis, JI-3	STATUS FINAL
	DISTRIBUTION	APPROVED BY: JI-3

TABLE OF CONTENTS

BACKGROUND

On August 25, 2009, U.S. Secretary of Transportation Ray LaHood received an investigative referral from the U.S. Office of Special Counsel (OSC). An air traffic control specialist disclosed aviation safety concerns to OSC regarding implementation of the Northeast Flow air traffic procedure by Detroit Metropolitan Wayne County Airport (DTW) management. The Secretary delegated investigative responsibility to the Office of Inspector General (OIG) and FAA's Air Traffic Safety Oversight Service (AOV). We conducted this investigation jointly with AOV, and AOV concurs with this report. Attachment 1 describes the methodology of our investigation.

The Northeast Flow was a procedure used briefly at DTW while one runway was closed for renovation. The procedure was used from approximately May to November 2007 and from approximately April to July 2008. It has not been used since that time, and in November 2009 DTW management removed the Northeast Flow from DTW's authorized Standard Operating Procedures.

When fully operational, DTW has four north-south parallel runways, and two east-west parallel runways. DTW normally uses a North Flow pattern, where aircraft arrive in a northerly direction on the outer parallel north-south runways and depart in a northerly direction from the inner parallel north-south runways. DTW management used the Northeast Flow to retain the use of four runways for arrivals and departures during two renovations of a north-south runway (3R-21L). The Northeast Flow used one of the inner parallel north-south runways for arrivals and one of the east-west runways (9R-27L) as the second departure runway. A taxiway (Quebec) and a service road lie approximately 1,500 and 1,000 feet, respectively, to the west of Runway 9R-27L. There are no blast fences or deflectors west of Runway 9R-27L to protect aircraft using Taxiway Quebec or vehicles on the service road from possible jet blast or signage to alert vehicles or pedestrians on the service road of the potential risk of jet blast.

SYNOPSIS

We were unable to substantiate by a preponderance of the evidence any violations of law, rule, or regulation in the implementation and operation the Northeast Flow. This operation is no longer in use and is no longer an authorized procedure; therefore, it does not pose a substantial and specific threat to public safety. We found that this procedure complied with applicable air traffic control regulations including FAA Order 7110.65. We are aware of no reported incidents or complaints from pilots or ground crew concerning this procedure. We found that the Wayne County Airport Authority (WCAA) prepared and FAA approved environmental documents in compliance with FAA Order 1050.1E prior to implementing the Northeast Flow. These documents included an environmental and noise analysis in March 2007 and subsequent documentation prepared

prior to the resumption of the Northeast Flow in 2008. Although DTW officials told investigators they considered safety issues when developing and implementing the Northeast Flow in 2007, no corresponding safety risk assessment-related documentation exists, and we therefore could not verify this claim. DTW and FAA officials explained that facilities within the Central Service Area such as DTW were not required to document a formal assessment within the FAA Air Traffic Organization (ATO) Safety Management System at the time DTW conducted the Northeast Flow. DTW officials acknowledged they did not conduct a staff study prior to implementing the Northeast Flow. FAA officials explained that FAA had cancelled the order regarding staff studies approximately two months prior to the facility's initial implementation of the flow in May 2007. We found that FAA and WCAA officials were aware of the possibility of DTW departing aircraft from Runway 9R-27L during the Northeast Flow as early as 2006. These officials worked closely with their DTW counterparts during the development of the flow and helped to convey its impacts to the general public and local government officials. Finally, we found no evidence the FAA violated any document retention requirements.

Below are the details of our investigation.

DETAILS:

Allegation 1: DTW officials operated the Northeast Flow in a manner that created a safety hazard.

FINDINGS

We were unable to substantiate this allegation.

The whistleblower alleged that using Runway 9R-27L for departures to the east created a safety hazard because: (1) the lack of blast fences or signage west of Runway 9R-27L puts aircraft on Taxiway Quebec and vehicles on the service road in danger of being damaged from foreign object debris caused by the jet blast from aircraft departing the runway, (2) aircraft must cross an active runway, and (3) aircraft must taxi a great distance from the terminal to depart from Runway 9R-27L.

Blast Fences

Guidance on blast fences is found in FAA Advisory Circular 150/5300-13, Chapter 8, *"The Effects and Treatment of Jet Blast,"* September 29, 1989. This circular acknowledges that jet blast of at least 20 miles per hour can create flying debris that poses a risk to aircraft or vehicles over 2,000 feet behind aircraft during takeoff thrust. This circular does not require blast fences, but "suggests means to minimize the effects of jet blast. . . ." Subchapter 802 states that "blast fences may be necessary near runway

ends, run-up pads, etc., to shield off-airport, as well as, airport pedestrian or vehicular traffic." In our view, the use of the terms "suggests" and "may" indicates that the portions of Chapter 8 of Advisory Circular 150/5300-13 concerning blast fences constitute a recommendation rather than a requirement and, therefore, does not obligate WCAA to erect blast fences west of Runway 9R-27L.

In support of this allegation, the whistleblower provided investigators with a copy of an April 28, 2008, safety report filed by a controller who observed at least twelve aircraft on Taxiway Quebec while aircraft departed Runway 9R-27L. The safety report, however, cited only the controller's own concern rather than complaints or reports from the pilots of aircraft using the taxiway. In his OIG interview, the whistleblower was unable to provide any complaints or reports from pilots citing debris or concerns about jet blast while using Taxiway Quebec or similar concerns form airport personnel using the service road.

We interviewed senior WCAA officials, including Lester Robinson (who served as WCAA Chief Executive Officer (CEO) in 2007 and 2008); Diane Walker, Director of Airfield Operations (who is responsible for erecting blast fences at DTW); and Wayne Seiloff, Director - Planning, Design & Construction Division. None of these officials considered the lack of blast fences a safety issue, recalled any safety concerns at the time the Northeast Flow was used, or receiving any complaints regarding jet blast from aircraft departing Runway 9R-27L.

Nevertheless, after we voiced the whistleblower's concerns to Ms. Walker, she asked her staff to determine whether blast fences were needed to the west of Runway 9R-27L. In an email dated June 22, 2010, Ms. Walker advised that placing a blast fence is this area is "not feasible," as this, among other things, would interfere with the Runway Object Free Area and Obstacle Free Zone, which extend beyond the end of Runway 9R-27L and must be clear of objects. She stated, however, that the issue of blast fences could be revisited if FAA grants a waiver of the applicable restrictions that prohibit erecting a blast fence in that area. (Attachment 2)

Crossing an Active Runway and Taxiing a Great Distance

In his OSC disclosure, the whistleblower cited the safety hazard created by aircraft having to cross active Runway 3L-21R or travel a long distance to depart from Runway 9R-27L. In his OIG interview, he acknowledged that doing so does not violate any law, rule, or regulation. AOV reviewed the Northeast Flow procedures and determined they did not constitute a specific and substantial threat to public health or safety. According to AOV, departing aircraft cross active runways daily at airports throughout the country.

Air Traffic Controllers Were Briefed on the Northeast Flow

Because of rehabilitation construction on Runway 3R-21L, DTW managers briefed air traffic controllers about the Northeast Flow in March 2007. Effective May 2, 2007,

DTW management issued the Air Traffic Control Tower procedures for conducting the flow in Notice DTW N7110.142 and the Terminal Radar Approach Control (TRACON) procedures in Notice D21 N7110.131. Controllers were briefed on Notice DTW N7110.142 again in March 2008 prior to construction on east-west Runway 9L-27R, which required a second phase of rehabilitation work on Runway 3R-21L.

The Northeast Flow is No Longer an Authorized Procedure
On November 30, 2009, Motown District Manager Joseph Figliuolo issued Notice DTW N7110.188, which cancelled the Northeast Flow and removed the procedure from the Air Traffic Control Tower's Standard Operating Procedures. (Attachment 3) On March 18, 2010, Mr. Figliuolo issued a memorandum to all personnel advising that the Northeast Flow "is no longer necessary" and that all references to the flow would be removed from the Letter of Agreement between Detroit's Air Traffic Control Tower and TRACON. (Attachment 4)

Allegation 2: DTW officials failed to conduct the required environmental assessment and noise analysis, safety risk assessment, and staff studies prior to implementing the Northeast Flow.

FINDINGS

Environmental Assessment and Noise Analysis
This allegation is unfounded. WCAA prepared and FAA approved environmental documents in compliance with FAA Order 1050.1E, "*Environmental Impacts: Policies and Procedures*," prior to implementing the Northeast Flow.

The National Environmental Policy Act (NEPA) requires FAA to consider and document the environmental impact of its actions. The environmental impact of the proposed action determines the type of environmental document an agency must create, and each document involves a different level of environmental, scientific, and technical analysis. FAA environmental procedures are found in FAA Orders 1050.1E, "*Environmental Impacts: Policies and Procedures*," and 5050.4B, *"[NEPA] Implementing Instructions for Airport Actions*."

NEPA requires the creation of one of three documents: (1) a detailed Environmental Impact Statement (EIS) when the proposed action will significantly impact the environment; (2) a concise Environmental Assessment (EA) to describe and determine the significance of the proposed action's environmental impact; or (3) a Categorical Exclusion for proposed actions that do not, based on previous similar projects, involve significant environmental impacts and therefore do not require the creation of an EA or EIS. If the EA concludes the proposed action will have significant environmental impact,

FAA must then create an EIS. Otherwise, it must issue a Finding of No Significant Impact.

The initial construction on Runway 3R-21L necessitated the use of the Northeast Flow from approximately May to November 2007. The project proposed by WCAA included the demolition, removal, and replacement of the northern 7,600 feet of the runway. Because the proposed project triggered the requirements of NEPA, WCAA prepared a 31-page EA in approximately March 2007. (Attachment 5)

The EA discusses the environmental impacts, including noise, which would result from the implementation of the rehabilitation project. Specifically, the EA states that the project would result in increased noise during the temporary closure of Runway 3R-21L. For example, page 21 of the EA states, "The Proposed Action would also result in a 1.5 [Day-Night Average Sound Level] increase in noise to an area east of the Airport in the city of Romulus[.] This area east of the Airport would experience increased noise due to the use of the crosswind Runway 9R-27L during high demand periods."

WCAA forwarded the EA to the FAA Airports District Office (ADO) in Detroit for approval. Acting Assistant ADO Manager Ernest Gubry and his staff evaluated the EA and found it compliant with the conditions of NEPA. Mr. Gubry signed the EA on March 14, 2007, and he issued a Finding of No Significant Impact/Record of Decision (FONSI/ROD). (Attachment 6)

The requirements of NEPA also applied to the construction project that necessitated the use of the Northeast Flow in 2008. In anticipation of this project, then WCAA CEO Robinson submitted to Mr. Gubry a letter dated December 14, 2007, seeking a Categorical Exclusion for the proposed construction project, which required the closure of Runway 9L-27R. (Attachment 7) According to Mr. Robinson's letter, under paragraph 303 of FAA Order 1050.1E, proposed actions may be categorically excluded from detailed analysis if the actions do not significantly affect the human environment and no "extraordinary circumstances," as provided in paragraphs 304a through 304k of the Order, exist. Mr. Robinson concluded that the proposed construction project would not have significant impacts, either individually or cumulatively, to the human environment and that no extraordinary circumstances existed. Mr. Gubry reviewed WCAA's letter and granted the Categorical Exclusion in a memorandum dated February 8, 2008. (Attachment 8)

Safety Risk Assessment

We interviewed Motown District Manager Figliuolo, Detroit TRACON Support Manager Patricia Bynum, TRACON Operations Manager Clifford Auxier, and TRACON Operations Manager Kevin Grammes (who served as the Air Traffic Control Tower Operations Manager in 2007 and 2008). These officials told investigators that safety risk issues were considered when the Northeast Flow was developed. We could not verify

these claims, as no corresponding safety risk assessment-related documents could be located. DTW officials explained that the facility was not required, at that time, to document a formal assessment within the ATO Safety Management System.

Ms. Bynum told investigators that although it was not documented, she and other DTW officials would have assessed the safety risks of the Northeast Flow to ensure it was a safe operation and in compliance with applicable FAA rules and regulations. According to Ms. Bynum, the requirement to document a safety risk assessment did not exist within the Central Service Area until the issuance of FAA Order JC 7232.15, "*Safety Risk Management Implementation*," by Central Service Area Director Nancy Kort on September 30, 2008. The Order, which provides the responsibilities and procedures required to achieve compliance with ATO's Safety Management System did not become effective until October 1, 2008, more than two months after DTW last conducted the Northeast Flow.

We interviewed Dorothy Davis, Operations Evaluation Team Manager for the Central Service Area Quality Control Group, to verify the ATO Safety Management System requirements to which DTW was subject while it conducted the Northeast Flow in 2007 and 2008. Ms. Davis advised that DTW was not required to document its safety risk assessment during this time. Ms. Davis stated that FAA Order 1000.37, "*Air Traffic Organization Safety Management System*," which identifies the strategic and tactical safety responsibilities within the Safety Management System, did not require full implementation of the system's requirement until March 14, 2010.

Staff Studies

DTW officials did not conduct staff studies prior to conducting the Northeast Flow. Mr. Figliuolo, Ms. Bynum, and Mr. Grammes told investigators they do not believe DTW officials were required to conduct such studies prior to implementing the flow. According to Ms. Bynum, staff studies are typically conducted when changing an airport's airspace, which did not occur in conjunction with the Northeast Flow.

We interviewed Ms. Davis to determine the staff study requirements to which DTW was subject in 2007 and 2008. According to Ms. Davis, the applicable order, FAA Order 1800.2G, "*Evaluations, Appraisals and Staff Studies*," was cancelled by FAA on February 26, 2007. FAA is still working on a replacement order. Even if FAA Order 1800.2G required DTW officials to perform staff studies prior to implementing the Northeast Flow, the Order had lapsed prior to the effective date of the flow on May 2, 2007.

Allegation 3: DTW officials failed to properly notify local and federal aviation officials that aircraft would depart to the east from Runway 9R-27L during the Northeast Flow.

FINDINGS

This allegation is unfounded. Local and FAA officials were aware that departures would occur to the east from Runway 9R-27L prior to DTW conducting the Northeast Flow in 2007 and 2008. In fact, documents and witness statements indicate that these officials worked closely with their DTW counterparts during the development of the flow and helped to convey its impacts to the general public.

The Northeast Flow created an uncommon situation at DTW, as aircraft would be departing due east from the facility. Departing aircraft to the east from Runway 9R-27L during the Northeast Flow resulted in unfamiliar air traffic and noise for communities to the east of the airport. According to the whistleblower, because DTW officials failed to adequately notify WCAA and FAA officials about those easterly departures prior to the implementation of the Northeast Flow, the officials were unable to properly assess the aforementioned need for blast fences and the effects on neighboring communities affected by the flow.

WCAA and FAA officials were aware as early as February 2006 that departures from Runway 9R-27L could occur during the closure of Runway 3R-21L in 2007. WCAA provided copies of the minutes and a PowerPoint presentation from a February 1, 2006, Planning and Airspace Commission meeting attended by WCAA Director of Airfield Operations Walker and four other officials from WCAA, Acting Assistant ADO Manager Gubry and two other officials from the Detroit ADO, and four FAA officials from DTW. Pages 2-3 of the minutes state that for the 2007 construction season, "Presuming that the 3R end was re-constructed in 2006, it is not beneficial to temporarily relocate the 21L threshold in 2007. Similar operational capability can be achieved by using Runway 9R-27L instead of the shortened Runway 3R-21L without the incremental additional construction cost associated with relocating the threshold." (Attachment 9) Slide 2 of the PowerPoint presentation - which labels the Northeast Flow that was eventually adopted as "Option 1" for the temporary air traffic patterns during construction - shows departures to the east from Runway 9R-27L. (Attachment 10)

Additionally, the March 2007 EA, which states departures would occur from Runway 9R-27L, was prepared by WCAA and evaluated by Mr. Gubry and his ADO staff and became a federal document with his signature on March 14, 2007. According to Page 1 of the EA, "During peak periods it is anticipated that Runway 9R-27L, one of the crosswind runways, would also be used for arrivals and departures as weather conditions and wind direction permit in order to accommodate peak demand."

Mr. Gubry's March 14, 2007, FONSI/ROD also references departures from Runway 9R-27L. On page 5 it states, "During the Proposed Action, Runway 3R-21L would be closed and Runway 9R-27L and the parallel runways would be used for those flights during peak hours and the shoulder periods leading up to and following the peak hours."

Moreover, not only were relevant FAA and WCAA officials aware that aircraft would depart to the east from Runway 9R-27L during the Runway 3R-21L construction in 2007, they actively conveyed this information to the general public and local government officials. For example, page 30 of the EA states that on February 9, 2007, WCAA placed copies of the EA at several locations in local communities to inform the general public, which was provided the opportunity to comment on the EA and proposed construction project from February 11, 2007, to March 11, 2007. The WCAA held a Public Information Session on March 1, 2007, and placed notifications of the session in classified sections of the Detroit Free Press and Detroit News on February 22 and 24, 2007, and in the News Herald, a local paper serving the communities around DTW, on February 25, 2007. According to the minutes of the Public Information Session, several officials from WCAA, as well as Mr. Gubry and a representative from the City of Romulus, which surrounds DTW, attended. (Attachment 11) Page 2 of the minutes states, "During select times during the day when activity requires additional capacity, Runway 9R will be utilized for departures." Similarly, slide 7 of the PowerPoint presentation WCCA gave during the Public Information Session, which is titled "Temporary Runway Use," also indicates departures will occur from Runway 9R-27L. (Attachment 12)

According to Mr. Gubry, then WCAA CEO Robinson met with various local community leaders to inform them of the increased noise that would result from the flow. In his OIG interview, Mr. Robinson could not specifically recall easterly departures from Runway 9R-27L, but he confirmed that he spoke with the mayors of several communities located east of DTW (including Allen Park, Dearborn, Dearborn Heights, Lincoln Park, Romulus, Southgate, and Taylor) in 2007 regarding increased air traffic and noise, and he spoke with the mayors of Dearborn, Dearborn Heights, Romulus, and Taylor again in 2008, prior to the second phase of the airfield renovation.

We did find that Mr. Gubry's February 8, 2008, Categorical Exclusion for phase two of the runway renovations provided ambiguous information. According to an Additional Environmental Analysis memorandum attached to the Categorical Exclusion, during the closure of Runway 3L-21R necessitated by the 2008 construction on Runway 9R-27L, "the FAA Air Traffic Control Tower does not plan to use the other crosswind Runway 9R-27L as a replacement runway during construction." Data no longer exists to verify the number, if any, of departures that occurred to the east from Runway 9R-27L between approximately April and July 2008 during the construction project. Mr. Gubry told OIG that despite the language in his February 2008 memorandum, departures to the east from Runway 9R-27L were neither prohibited nor unanticipated by FAA officials. According

to Mr. Gubry, although DTW did not "plan" to depart aircraft to the east from Runway 9R-27L, he was aware at the time that wind conditions, for example, could have necessitated that DTW conduct such departures.

In sum, the weight of documentary evidence and witness statements indicates that WCAA, FAA, and local officials, as well as the general public, were adequately informed that aircraft would depart to the east from Runway 9R-27L prior to the implementation of the Northeast Flow in May 2007. Accordingly, WCAA officials were sufficiently informed to adequately consider the need for blast fences to the west of Runway 9R-27L.

Allegation 4: FAA officials failed to retain documents related to the Northeast Flow as required under FAA's document retention requirements.

FINDINGS

This allegation is unfounded. As described above, FAA officials conducted the appropriate environmental and noise assessments prior to implementing the Northeast Flow in 2007 and 2008 and retained copies of those documents. DTW officials were not required to document a safety risk assessment or conduct staff studies prior to implementing the Northeast Flow in 2007 and 2008. Consequently, there are no corresponding records to retain.

ADDITIONAL INFORMATION

FAA's communications with the whistleblower during his attempts to obtain documents relating to the Northeast Flow under the Freedom of Information Act (FOIA) were subject to misinterpretation. Specifically, a FOIA specialist reported to the whistleblower that no safety risk assessment documents have been "retained." This statement could be interpreted as meaning that FAA failed to preserve these records. In fact, as described above, there is no evidence FAA ever created such a record. The use of the word "retained" appears to be an innocent translation of information the FOIA specialist received from DTW Acting Staff Manager Gary Ancinec, who reported to the FOIA specialist that no safety risk assessment documents "exist." At this time, FAA has provided all relevant records to the whistleblower except for the four environmental documents described above.

INDEX OF ATTACHMENTS

1. Methodology
2. Email from WCAA Director of Airfield Operations Diane Walker, June 22, 2010
3. Notice DTW N7110.188, *"Cancellation of Northeast Flow Procedures,"* November 30, 2009
4. *"Revision 2 to the D21/DTW Letter of Agreement,"* March 18, 2010
5. Environmental Assessment, Runway 3R-21L Rehabilitation Project, March 14, 2007
6. Finding of No Significant Impact/Record of Decision, Runway 3R-21L Rehabilitation Project, March 14, 2007
7. Letter Requesting Categorical Exclusion, Runway 9L-27R Reconstruction, December 14, 2007
8. Categorical Exclusion, Runway 9L-27R Reconstruction, February 8, 2008
9. Meeting Minutes for Planning and Airspace Commission, February 1, 2006
10. PowerPoint Presentation from Planning and Airspace Commission, February 1, 2006
11. Meeting Minutes for Public Information Session, March 1, 2007
12. PowerPoint Presentation from Public Information Session, March 1, 2007

ATTACHMENT 1: METHODOLOGY OF INVESTIGATION

This investigation was conducted by an OIG Senior Attorney-Investigator, with technical assistance from an FAA Air Traffic Investigator (also certified as an Air Traffic Control Specialist) assigned to the AOV. To address the whistleblower's concerns, we interviewed and held discussions with the following individuals:

- Gary Ancinec, Acting Detroit Staff Manager, FAA
- Clifford Auxier, Detroit TRACON Operations Manager, FAA
- Carl Burton, Jr., former Detroit TRACON Frontline Manager, FAA
- Lindsay Butler, Acting Manager, Planning/Programming Branch, ADO Great Lakes Region, FAA
- Patricia Bynum, Detroit TRACON Support Manager, FAA
- Dorothy Davis, Operations Evaluation Team Manager for the Central Service Area Quality Control Group, FAA
- Joseph Figliuolo, District Manager for the Motown District, FAA
- Kevin Grammes, Detroit TRACON Operations Manager, FAA
- Ernest Gubry, Acting Assistant Detroit ADO Manager, FAA
- Lester Robinson, former WCAA CEO
- Wayne Sieloff, Director - Planning, Design & Construction Division, WCAA
- Vincent Sugent, Detroit Air Traffic Control Specialist
- Diane Walker, Director - Airfield Operations Division, WCAA

In addition, our investigative team reviewed numerous records and documents obtained from the whistleblower, DTW, FAA, and WCAA including memoranda, emails, meeting minutes, airport diagrams, and FAA regulations, orders, and notices.

ATTACHMENT 2: EMAIL FROM WCAA DIRECTOR OF AIRFIELD OPERATIONS DIANE WALKER, JUNE 22, 2010

From: Dianne Walker
To: Urvina, Brian
Subject: FW: Emailing: qqqqqt.pdf
Date: Tuesday, June 22, 2010 3:54:23 PM
Attachments: qqqqqt.pdf

<<qqqqqt.pdf>> Brian,

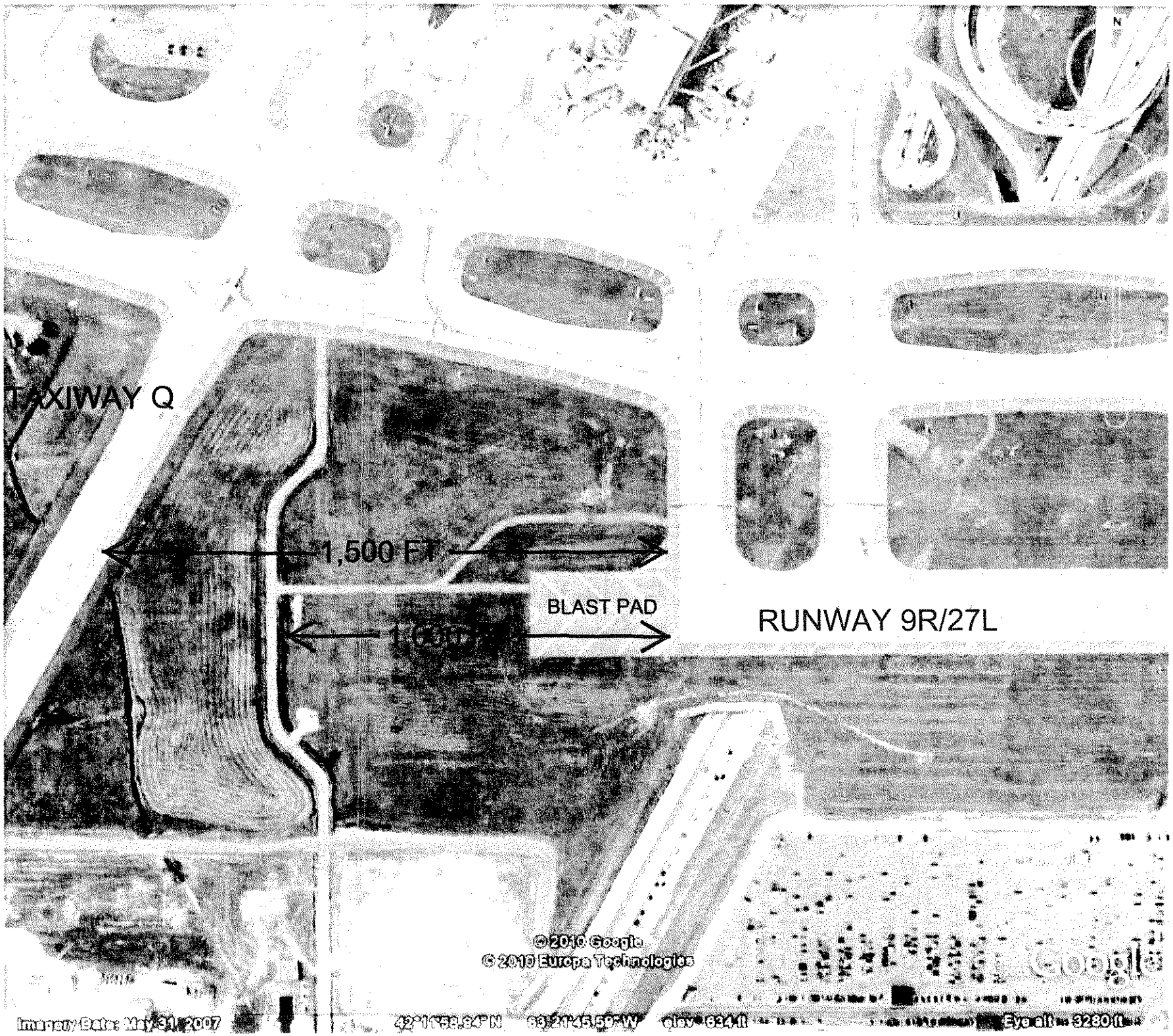
See the attached drawing. East/West Operations only occur at DTW 5% out of the year. The 9R Departure that you spoke of occurred in the 2007/2008 construction season for Runway 21L/3R. Normally east/west operations are configured for arrivals and departures on 27L and 27R and not the other way around.

The drawing shows the access road outside of the 1000 ft. safety area for Runway 9R and Taxiway Q approx. 1500 ft. from the approach of Runway 9R. Placing a blast fence in that area is not feasible (due to interference with the OFA (Object Free Area), OFZ (Object Free Zone) and potentially a Part 77 issue. If the FAA provides a waiver for those issues, then we can and will revisit the blast fence concerns.

If you have any questions, please email or give me a call.

Thanks,

Dianne


TAXIWAY Q
1,500 FT
BLAST PAD
1,600 FT
RUNWAY 9R/27L
© 2010 Google
© 2010 Europa Technologies
Image Date: May 31, 2007
Eye alt 3280 ft

000004

ATTACHMENT 3: NOTICE DTW N7110.188, *"CANCELLATION OF NORTHEAST FLOW PROCEDURES,"* NOVEMBER 30, 2009

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
DETROIT METRO ATCT

DTW N7110.188

Effective Date:
November 30, 2009

Cancellation Date:
November 30, 2010

SUBJ: Cancellation of Northeast Flow Procedures

1. Purpose of This Notice. This notice cancels all Northeast Flow procedures contained in the DTW N7110.9, Standard Operating Procedures (SOP).

2. Audience. This notice applies to DTW Tower, and all associated support personnel.

3. Where Can I Find This Notice? This notice is available in all applicable DTW and D21 publications and the FAA Federal Directives Repository, https://loa.faa.gov/

4. Explanation of Changes. The need for a Northeast Flow is no longer required. All Northeast Flow procedures will be removed from the DTW SOP.

5. Procedures. Remove the following paragraphs and maps in the DTW SOP:

- 4-5 Northeast Flow Procedures
- 5-9 Northeast Flow, all subsequent paragraphs are reduced by 1
- 6-29 Northeast Flow, all subsequent paragraphs are reduced by 1
- Appendix 6 Ground Control Areas of Responsibility – Northeast Flow

Joseph Figliuolo III
Air Traffic Manager
Detroit Metro ATCT

ATTACHMENT 4: *"REVISION 2 TO THE D21/DTW LETTER OF AGREEMENT,"* MARCH 18, 2010

Federal Aviation Administration

Memorandum

Date: 3/18/10

To: All Personnel

Joseph Figliuolo III

From: Joseph Figliuolo III, District Manager, Motown District

Prepared by: Rodney Harris, x5024

Subject: Revision 2 to the D21/DTW Letter of Agreement

The need for this facility to utilize a Northeast Flow is no longer necessary. Therefore all references to Northeast Flow in the D21/DTW Letter of Agreement will be removed from the following paragraphs:

- **9. PULLOUT/GO AROUND PROCEDURES**
  (5) Remove – all subsequent sub-paragraphs are reduced by 1
  g. Northeast Flow - remove

- **11. DEPARTURE PROCEDURES**
  c. DTW shall:
  (8) (d) Northeast Flow – remove

ATTACHMENT 5: ENVIRONMENTAL ASSESSMENT, RUNWAY 3R-21L REHABILITATION PROJECT, MARCH 14, 2007

ENVIRONMENTAL ASSESSMENT

for

RUNWAY 3R-21L REHABILITATION PROJECT

at

DETROIT METROPOLITAN WAYNE COUNTY AIRPORT

DETROIT, MICHIGAN

Prepared by:

Wayne County Airport Authority

March, 2007

"This Environmental Assessment becomes a Federal document when Evaluated, signed and dated by the responsible FAA official."

Ernest P. Conley FAA Official

3-14-2007 Date

TABLE OF CONTENTS

APPENDICES

Appendix A Wetland Evaluation
Appendix B Newspaper Advertisements
Appendix C Newspaper Articles

I. Proposed Action

The Detroit Metropolitan Wayne County Airport (the Airport) is operated by the Wayne County Airport Authority (Airport Authority). The Airport Authority has proposed the rehabilitation of Runway 3R-21L (Proposed Action or Project). The Project consists of the demolition, removal and full-depth replacement of the pavement section for the northern 7,600 feet of the 150 feet wide Runway 3R-21L, the blast pad on each end and the portion of all adjacent stub taxiways within the runway safety area along the northern-most 7,600 feet located between the runway and parallel Taxiway W (see **Exhibit 1**). The Project includes an on-site concrete batch plant and construction material storage area as well as dedicated haul routes for the construction activities. The batch plant and material storage area is located on the south side of Northline Road just west of Middlebelt Road. The contractor would use existing gravel roads for construction haul routes and no new haul routes are anticipated to be required. **Exhibit 1** at the end of this report illustrates the Project limits, construction material storage areas and contractor haul routes for the Proposed Action.

The Project is planned to take 175 days and is proposed to start in the spring of 2007. During the 175 day construction period operations typically assigned to Runway 3R-21L would be reassigned to one of the other parallel runways typically used in the primary operating configuration (3L-21R, 4R-22L, or 4L-22R). During peak periods it is anticipated that Runway 9R-27L, one of the crosswind runways, would also be used for arrivals and departures as weather conditions and wind direction permit in order to accommodate peak demand. This would result in Runways 3L-21R, 4R-22L, 4L-22R and 27L being used more often than would typically occur without the Proposed Action and as a result, a temporary increase in the number of aircraft and noise over residences immediately north and east of the airport is anticipated. This temporary operation would not result in the creation of any new air traffic procedures but would result in additional numbers of operations on existing flight tracks.

Federal participation in any action that could significantly impact the human environment requires environmental review pursuant to the National Environmental Policy Act of 1969 (NEPA). Further, when the Federal Aviation Administration (FAA) participates in an action impacting the human environment, FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, and FAA Order 1050.1E *"Environmental Impacts: Policies and Procedures"* provides for the development of an environmental report meeting the requirements of NEPA and the Council on Environmental Quality (CEQ) 40 CFR 1508.4.

II. Purpose and Need for the Proposed Action and Alternatives

The Airport is currently the 11th busiest airport in the U.S. handling over 521,000 aircraft operations in 2005. Runway 3R-21L is one of four primary runways needed to efficiently accommodate the current and future aircraft arrival and departure activity at the Airport. Without the Proposed Action, Runway 3R-21L would eventually be unable to safely accommodate aircraft operations and would have to be closed. Permanently closing Runway 3R-21L would dramatically reduce airfield capacity, increase utilization of the three remaining parallel runways and result in a significant increase in aircraft delays at the Airport as well as consequential delays at other airports that rely on the Airport's role as a connecting hub airport. Permanent closure of Runway 3R-21L would also necessitate permanent changes to the flight track usage that would result in significant changes in noise over noise sensitive areas. The purpose of the Proposed Action is to ensure compliance with the FAA Airport Improvement Program grant assurances by extending the useful life of the runway by at least 20 years so that it may continue to function as a primary runway within the airfield system at the Airport.

Runway 3R-21L was constructed in 1976 and is one of three runways at the Airport that have navigational aids that allow aircraft to land in inclement weather. However, the other two runways (Runways 4R-22L and 4L-22R) cannot be used currently to land aircraft simultaneously under inclement weather because they are located too close together to allow safe operations.

In the last ten years, Runway 3R-21L has required increasing repair and maintenance in the form of extensive patching. The need for the Proposed Action is to address deteriorating condition of the pavement and the patching which result in the development of Foreign Object Debris (FOD). Foreign Object Debris may result in a significant safety hazard. The deteriorating condition of runway 3R-21L has become the focus of increasing concern by the Airport Authority, the FAA, and the Airline Pilots Association (ALPA). In 2003, the Airport Authority initiated a Pavement Management Study (PMS) to identify and prioritize areas of the airfield that are in need of repair and/or replacement. Following completion of the PMS in 2004, one of the highest priorities of the PMS was the rehabilitation of Runway 3R-21L. The ALPA recently expressed safety concerns about using the Runway. Based on the results of the PMS and the importance of the runway to airfield operations, the Airport Authority determined that rehabilitating Runway 3R-21L was an immediate priority. In 2005, the Airport Authority initiated planning and design elements of the Proposed Action.

In 2006, the Airport Authority rehabilitated the southern 2,400 feet of Runway 3R-21L. During this project, the runway threshold was displaced, allowing certain aircraft to land and depart on the shortened runway section while the rehabilitation was completed. The Proposed Action cannot utilize this approach because there is insufficient pavement length available to safely operate the Runway.

Airport certification inspectors have identified safety issues involving Runway 3R-21L on numerous occasions dating back to 2001. Letter of Correction discrepancies and Safety Recommendations resulting from periodic FAA inspection of the runway have documented failed pavement conditions, problems with patches/repairs, cracks, spalling, surface variations, loose aggregate, and FOD. Over 2,000 patches were installed on Runway 3R-21L and two other runways during the summer of 2002. An FAA inspection conducted in October 2002 recognized the Airport Authority's efforts to complete pavement repairs on Runway 3R-21L, but noted that a more permanent pavement repair would be necessary in the next several years. The FAA inspection recognized that seasonal weather effects experienced in Michigan frequently cause pavement patches to fail and result in the creation of FOD. *Therefore, the Proposed Action is necessary to continue to maintain safe operations on the runway.*

Airport certification inspections have also documented the absence of positive drainage along Runway 3R-21L. The lack of drainage has resulted in the formation of ice on the pavement during winter months. As a result of these conditions, Runway 3R-21L is closed daily (weather permitting) for detailed pavement inspections and ice removal as needed. These closures are extended as needed to complete such maintenance/repairs. The proposed action will provide positive drainage and reduce the number and length of closures related to ice formation.

Based on the deteriorating condition of the pavement and the recent closure history, presented in **Table 1,** *Runway 3R-21L Closure Data,* the Airport Authority anticipates Runway 3R-21L would be taken out of service for routine and emergency maintenance approximately 30 days and 60 nights in 2007 if the Proposed Action does not occur. In addition to the routine and emergency maintenance, several runway-related projects will be completed in 2007 even if the Proposed Action does not occur. This includes runway safety area improvements, electrical hand-hole modifications and replacement of a concrete slab in the runway. These projects would be done simultaneously with the planned routine maintenance on the runway and would require the entire 30 day closure to complete. Additional runway closures would occur until the Proposed Action is undertaken. Without the Proposed Action, the runway would need to be permanently closed at some time in the future when it could no longer be maintained.

Table 1: Runway 3R-21L Closure Data

Year	Day (0700-2159)	Night (2200-0659)
2004	19	12
2005	6	11
2006	22	47
2007 (estimate)	30	60

Deferral of the Proposed Action is not practicable as it would likely result in further deterioration of the pavement, patches and aggregate base, leading to more frequent closures for routine and emergency maintenance, and a potentially longer rehabilitation

ENVIRONMENTAL ASSESSMENT

for

RUNWAY 3R-21L REHABILITATION PROJECT

at

DETROIT METROPOLITAN WAYNE COUNTY AIRPORT

DETROIT, MICHIGAN

Prepared by:

Wayne County Airport Authority

March, 2007

"This Environmental Assessment becomes a Federal document when Evaluated, signed and dated by the responsible FAA official."

Ernest P Gubry FAA Official

3-14-2007 Date

TABLE OF CONTENTS

APPENDICES

Appendix A Wetland Evaluation
Appendix B Newspaper Advertisements
Appendix C Newspaper Articles

I. Proposed Action

The Detroit Metropolitan Wayne County Airport (the Airport) is operated by the Wayne County Airport Authority (Airport Authority). The Airport Authority has proposed the rehabilitation of Runway 3R-21L (Proposed Action or Project). The Project consists of the demolition, removal and full-depth replacement of the pavement section for the northern 7,600 feet of the 150 feet wide Runway 3R-21L, the blast pad on each end and the portion of all adjacent stub taxiways within the runway safety area along the northern-most 7,600 feet located between the runway and parallel Taxiway W (see **Exhibit 1**). The Project includes an on-site concrete batch plant and construction material storage area as well as dedicated haul routes for the construction activities. The batch plant and material storage area is located on the south side of Northline Road just west of Middlebelt Road. The contractor would use existing gravel roads for construction haul routes and no new haul routes are anticipated to be required. **Exhibit 1** at the end of this report illustrates the Project limits, construction material storage areas and contractor haul routes for the Proposed Action.

The Project is planned to take 175 days and is proposed to start in the spring of 2007. During the 175 day construction period operations typically assigned to Runway 3R-21L would be reassigned to one of the other parallel runways typically used in the primary operating configuration (3L-21R, 4R-22L, or 4L-22R). During peak periods it is anticipated that Runway 9R-27L, one of the crosswind runways, would also be used for arrivals and departures as weather conditions and wind direction permit in order to accommodate peak demand. This would result in Runways 3L-21R, 4R-22L, 4L-22R and 27L being used more often than would typically occur without the Proposed Action and as a result, a temporary increase in the number of aircraft and noise over residences immediately north and east of the airport is anticipated. This temporary operation would not result in the creation of any new air traffic procedures but would result in additional numbers of operations on existing flight tracks.

Federal participation in any action that could significantly impact the human environment requires environmental review pursuant to the National Environmental Policy Act of 1969 (NEPA). Further, when the Federal Aviation Administration (FAA) participates in an action impacting the human environment, FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, and FAA Order 1050.1E *"Environmental Impacts: Policies and Procedures"* provides for the development of an environmental report meeting the requirements of NEPA and the Council on Environmental Quality (CEQ) 40 CFR 1508.4.

II. Purpose and Need for the Proposed Action and Alternatives

The Airport is currently the 11th busiest airport in the U.S. handling over 521,000 aircraft operations in 2005. Runway 3R-21L is one of four primary runways needed to efficiently accommodate the current and future aircraft arrival and departure activity at the Airport. Without the Proposed Action, Runway 3R-21L would eventually be unable to safely accommodate aircraft operations and would have to be closed. Permanently closing Runway 3R-21L would dramatically reduce airfield capacity, increase utilization of the three remaining parallel runways and result in a significant increase in aircraft delays at the Airport as well as consequential delays at other airports that rely on the Airport's role as a connecting hub airport. Permanent closure of Runway 3R-21L would also necessitate permanent changes to the flight track usage that would result in significant changes in noise over noise sensitive areas. The purpose of the Proposed Action is to ensure compliance with the FAA Airport Improvement Program grant assurances by extending the useful life of the runway by at least 20 years so that it may continue to function as a primary runway within the airfield system at the Airport.

Runway 3R-21L was constructed in 1976 and is one of three runways at the Airport that have navigational aids that allow aircraft to land in inclement weather. However, the other two runways (Runways 4R-22L and 4L-22R) cannot be used currently to land aircraft simultaneously under inclement weather because they are located too close together to allow safe operations.

In the last ten years, Runway 3R-21L has required increasing repair and maintenance in the form of extensive patching. The need for the Proposed Action is to address deteriorating condition of the pavement and the patching which result in the development of Foreign Object Debris (FOD). Foreign Object Debris may result in a significant safety hazard. The deteriorating condition of runway 3R-21L has become the focus of increasing concern by the Airport Authority, the FAA, and the Airline Pilots Association (ALPA). In 2003, the Airport Authority initiated a Pavement Management Study (PMS) to identify and prioritize areas of the airfield that are in need of repair and/or replacement. Following completion of the PMS in 2004, one of the highest priorities of the PMS was the rehabilitation of Runway 3R-21L. The ALPA recently expressed safety concerns about using the Runway. Based on the results of the PMS and the importance of the runway to airfield operations, the Airport Authority determined that rehabilitating Runway 3R-21L was an immediate priority. In 2005, the Airport Authority initiated planning and design elements of the Proposed Action.

In 2006, the Airport Authority rehabilitated the southern 2,400 feet of Runway 3R-21L. During this project, the runway threshold was displaced, allowing certain aircraft to land and depart on the shortened runway section while the rehabilitation was completed. The Proposed Action cannot utilize this approach because there is insufficient pavement length available to safely operate the Runway.

Airport certification inspectors have identified safety issues involving Runway 3R-21L on numerous occasions dating back to 2001. Letter of Correction discrepancies and Safety Recommendations resulting from periodic FAA inspection of the runway have documented failed pavement conditions, problems with patches/repairs, cracks, spalling, surface variations, loose aggregate, and FOD. Over 2,000 patches were installed on Runway 3R-21L and two other runways during the summer of 2002. An FAA inspection conducted in October 2002 recognized the Airport Authority's efforts to complete pavement repairs on Runway 3R-21L, but noted that a more permanent pavement repair would be necessary in the next several years. The FAA inspection recognized that seasonal weather effects experienced in Michigan frequently cause pavement patches to fail and result in the creation of FOD. *Therefore, the Proposed Action is necessary to continue to maintain safe operations on the runway.*

Airport certification inspections have also documented the absence of positive drainage along Runway 3R-21L. The lack of drainage has resulted in the formation of ice on the pavement during winter months. As a result of these conditions, Runway 3R-21L is closed daily (weather permitting) for detailed pavement inspections and ice removal as needed. These closures are extended as needed to complete such maintenance/repairs. The proposed action will provide positive drainage and reduce the number and length of closures related to ice formation.

Based on the deteriorating condition of the pavement and the recent closure history, presented in **Table 1**, *Runway 3R-21L Closure Data*, the Airport Authority anticipates Runway 3R-21L would be taken out of service for routine and emergency maintenance approximately 30 days and 60 nights in 2007 if the Proposed Action does not occur. In addition to the routine and emergency maintenance, several runway-related projects will be completed in 2007 even if the Proposed Action does not occur. This includes runway safety area improvements, electrical hand-hole modifications and replacement of a concrete slab in the runway. These projects would be done simultaneously with the planned routine maintenance on the runway and would require the entire 30 day closure to complete. Additional runway closures would occur until the Proposed Action is undertaken. Without the Proposed Action, the runway would need to be permanently closed at some time in the future when it could no longer be maintained.

Table 1: Runway 3R-21L Closure Data

Year	Day (0700-2159)	Night (2200-0659)
2004	19	12
2005	6	11
2006	22	47
2007 (estimate)	30	60

Deferral of the Proposed Action is not practicable as it would likely result in further deterioration of the pavement, patches and aggregate base, leading to more frequent closures for routine and emergency maintenance, and a potentially longer rehabilitation

effort. Additionally, deferral of the Proposed Action would not eliminate or even reduce the environmental impacts associated with the Project and could ultimately result in an increase of the environmental impacts expected when the Proposed Action is eventually undertaken. Increased environmental impacts could result from a potentially longer closure or a closure that extended over more than one construction season. Further, the Airport Authority has determined that continued patching of the runway is not a viable alternative to the Proposed Action because the failure rate of the pavement and patching would likely result in significant FOD, potentially creating an unacceptable risk of aircraft damage.

Several alternative approaches to the Proposed Action were also considered in an effort to minimize operational and schedule impacts. A simple 6-week long partial asphalt overlay was considered, but was determined to be ineffective. The condition of the 17-inch concrete section is deteriorating so quickly that the overlay would not survive more than a few years at which point a minimum six month long full-depth replacement would still be required. This alternative represented significant additional costs without any operational or environmental benefits. Another alternative approach that was considered for the rehabilitation is a technique referred to as rubblization. This construction technique was evaluated in an on-site test completed in early 2006, but was rejected because it would effectively raise the elevation (height) of Runway 3R-21L, which would directly impact two crossing runways, all of the taxiway connectors, and the landscape adjacent to the runway shoulders. The added scope of work to address these impacts would not have enabled the project schedule to be reduced. In addition, it would have resulted in significant operational impacts to the airfield including loss of at least one cross-wind runway for the majority of the construction duration. The Proposed Action is a full-depth pavement rehabilitation phased to minimize both operational impacts and environmental impacts by completing the rehabilitation over one construction season.

The Proposed Action has been designed to minimize the amount of time that the runway would be closed. During preliminary design, the aggregate base course was determined to be salvageable. Selecting this option significantly reduces the time required to complete the project. Other benefits derived from this option include less trucking requirements, which directly eliminates truck exhaust emissions to the atmosphere. In addition, the contractor was allowed to set up a portable concrete batch plant at a location adjacent to the Proposed Action site. Using the portable batch plant allows the contractor to control the schedule for mixing and delivery of materials, thus optimizing the concrete installation. Similar to the reductions in truck exhaust emissions from not transporting aggregate base material, concrete truck exhaust emissions are significantly reduced by using the on-site batch plant. Together these factors enabled the Airport Authority to minimize the amount of time the runway would be closed to one construction season and ensure the runway would not be shut down over the winter.

effort. Additionally, deferral of the Proposed Action would not eliminate or even reduce the environmental impacts associated with the Project and could ultimately result in an increase of the environmental impacts expected when the Proposed Action is eventually undertaken. Increased environmental impacts could result from a potentially longer closure or a closure that extended over more than one construction season. Further, the Airport Authority has determined that continued patching of the runway is not a viable alternative to the Proposed Action because the failure rate of the pavement and patching would likely result in significant FOD, potentially creating an unacceptable risk of aircraft damage.

Several alternative approaches to the Proposed Action were also considered in an effort to minimize operational and schedule impacts. A simple 6-week long partial asphalt overlay was considered, but was determined to be ineffective. The condition of the 17-inch concrete section is deteriorating so quickly that the overlay would not survive more than a few years at which point a minimum six month long full-depth replacement would still be required. This alternative represented significant additional costs without any operational or environmental benefits. Another alternative approach that was considered for the rehabilitation is a technique referred to as rubblization. This construction technique was evaluated in an on-site test completed in early 2006, but was rejected because it would effectively raise the elevation (height) of Runway 3R-21L, which would directly impact two crossing runways, all of the taxiway connectors, and the landscape adjacent to the runway shoulders. The added scope of work to address these impacts would not have enabled the project schedule to be reduced. In addition, it would have resulted in significant operational impacts to the airfield including loss of at least one cross-wind runway for the majority of the construction duration. The Proposed Action is a full-depth pavement rehabilitation phased to minimize both operational impacts and environmental impacts by completing the rehabilitation over one construction season.

The Proposed Action has been designed to minimize the amount of time that the runway would be closed. During preliminary design, the aggregate base course was determined to be salvageable. Selecting this option significantly reduces the time required to complete the project. Other benefits derived from this option include less trucking requirements, which directly eliminates truck exhaust emissions to the atmosphere. In addition, the contractor was allowed to set up a portable concrete batch plant at a location adjacent to the Proposed Action site. Using the portable batch plant allows the contractor to control the schedule for mixing and delivery of materials, thus optimizing the concrete installation. Similar to the reductions in truck exhaust emissions from not transporting aggregate base material, concrete truck exhaust emissions are significantly reduced by using the on-site batch plant. Together these factors enabled the Airport Authority to minimize the amount of time the runway would be closed to one construction season and ensure the runway would not be shut down over the winter.

III. Environmental Consequences

Pursuant to the environmental documentation requirements defined in FAA Orders 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, and 1050.1E, *"Environmental Impacts: Policies and Procedures"* the following is a description of the anticipated environmental effects of the Proposed Action on each of the environmental resource categories.

- **Air Quality** - The impact of the Proposed Action on air quality were assessed pursuant to the FAA's *Air Quality Procedures for Civilian Airports & Air Force Bases*. Because the number of flights would not be changed, and the taxi distances would be essentially the same, airborne emissions due to the Proposed Action are not anticipated to change. Temporary air quality impacts could result from increased dust at the construction sites and along haul roads leading to the Proposed Action site, and from the construction equipment used for the Project. The discharge of dust at the construction site will be minimized by dust control practices during high-dust generating activities or extended dry periods. Dust from construction and material delivery vehicles will be minimized by using cargo covering tarps and dust control materials, when necessary. It has been determined that there will be no significant emissions impact as a result of the Project. The remaining paragraphs of this section discuss the existing air quality status in Wayne County and the applicable air quality regulations under the Clean Air Act and NEPA.

  Existing Air Quality Status

  The Airport is located in Wayne County, Michigan, which regulates air emissions according to a maintenance plan, approved by the U.S. Environmental Protection Agency (USEPA), for carbon monoxide (CO), ozone (O3), and particulate matter (particles with a diameter of 10 micrometers or less, PM10).[1] As such, certain Federal and state air quality regulations will be relevant to any improvements proposed at the Airport. The following sections discuss the applicability of regulations under the Clean Air Act and the National Environmental Policy Act as well as results of the analysis.

  Clean Air Act

  The Clean Air Act, including the 1990 Amendments (CAAA), established rules that apply to proposed Federal projects. These rules are intended to prevent the Federal government from approving or funding projects that will be contrary to State implementation Plans (SIP), which are developed to ensure that Federal air quality standards will be met and maintained throughout the states. The rules, the General Conformity Rule and the Transportation Conformity Rule, will apply to airport

[1] Wayne County, Michigan is located within the Metropolitan Detroit-Port Huron Intrastate Air Quality Control Region [40 CFR 81, Subpart B, §81.37 and Subpart C, §81.323]. Wayne County was designated attainment for ozone in March 1995.

improvement projects if the Airport were included within an area designated as non-attainment or maintenance for any of the "criteria pollutants", which are defined as nitrogen dioxide, sulfur dioxide, lead, as well as O_3, PM_{10}, and CO.[2]

Applicability of the General Conformity Rule will also depend on whether construction or implementation of the Proposed Action will have the potential to affect attainment of the goal set forth in the applicable SIP. In order to determine this, threshold levels were established under the CAAA to be used as screening criteria. These threshold levels, known as the *de minimis* thresholds, are presented in **Table 2,** *De Minimis Thresholds*. Note that in **Table 2** the *de minimis* threshold for ozone considers the emissions of volatile organic compounds (VOC) and nitrogen oxides (NO_x). This is because emissions of ozone cannot be directly quantified. Ozone is a pollutant created by the photochemical reaction of NO_x, VOC, and sunshine. Thus, the USEPA has determined that the emissions of NO_x and VOC, in combination, will be representative of ozone formation.

Table 2: De Minimis Thresholds

POLLUTANTS AND SEVERITY OF NONATTAINMENT	THRESHOLD LEVELS	
	NONATTAINMENT (tons per year)	MAINTENANCE (tons per year)
Carbon Monoxide (CO)	100	100
Particulate Matter (PM_{10})		
Moderate No attainment Area	100	100
Serious No attainment Area	70	
Sulfur Dioxide (SO_2)	100	100
Nitrogen Dioxide (NO_2)	100	100
Ozone (O_3)		50/100
Volatile Organic Compounds (VOC)/ Nitrogen Oxides (NOx)		
Serious No attainment Area	50/50	
Severe No attainment Area	25/25	
Extreme No attainment Area	10/10	
Inside an ozone transport region:		
Marginal No attainment Area	50/100	

[2] A maintenance area will be a geographical area that was previously designated as non-attainment for a particular pollutant and was subsequently shown to be in attainment. At that point, the state will develop a maintenance plan to ensure attainment will be maintained. Such a plan could remain in effect as long as 20 years. Wayne County operates under a maintenance plan for the continued attainment of CO, O_3, and PM_{10}.

Moderate No attainment Area	50/100	
Outside and ozone transport region		
Marginal No attainment Area	100/100	100/100
Moderate No attainment Area	100/100	
Lead (Pb)	25	25

Sources: 40 CFR Part 51.850; Part 81, Subpart B, §81.37 and Subpart C, §81.323.

Under the General Conformity Rule, a proposed airport improvement project will be considered to have the potential to adversely affect air quality if the annual net emissions due to the construction or implementation of the project were to exceed the *de minimis* threshold for the area's non-attainment or maintenance pollutant(s). Note that in Table 2 the *de minimis* threshold level for the maintenance of CO and PM10 emissions is 100 tons per year, and the threshold level for maintenance of O_3 is also 100 tons per year, each, for VOC and NOx.

Consequently, the air quality assessment must demonstrate whether or not the construction or implementation of the Proposed Action for the Airport will result in net emissions that will exceed 100 tons per year, each, of CO, PM_{10}, NO_x, or VOC. It should be understood that VOC's are created when hydrocarbon (HC) fuels are burned and there is incomplete combustion or the petroleum fuel evaporates. The USEPA assumes most HC to be VOC[5]. Therefore, in the regulatory context, and for purposes of this air quality assessment, VOC will be referred to hereafter as HC.

In order to determine the net emissions resulting from the Proposed Action, an emissions inventory was prepared. The focus of the inventory was solely on the construction emissions associated with the Proposed Action because implementation of the project, as discussed previously, will not cause additional emissions. Therefore, total construction emissions will reflect the project's total net emissions.

Emissions Inventory

An emissions inventory was prepared to determine the annual quantity of each criteria pollutant that will be emitted as a result of construction of the Proposed Action. A summary of the annual construction emissions for each element of the Proposed Action is presented in **Table 3**, *Construction Emissions Inventory*.

General Conformity Review

The purpose of a general conformity review is to examine the results of the emissions inventory and determine the need for a general conformity determined on behalf of the Proposed Action. A General Conformity Determination must be made if the annual net increase in emissions resulting from the Proposed Action exceeds the

[5] FAA and USAF *Air Quality Procedures for Civilian Airports & Air Force Bases*, April 1997.

corresponding applicable *de minimis* thresholds, which are 100 tons per year, each, of CO, PM_{10}, NO_x, and HC. Table 3 shows that the estimated annual increase in emissions of these pollutants will be less than the limit of 100 tons per year.

Therefore, the emissions inventory demonstrate that construction of the Proposed Action will not cause an increase in air emissions above the applicable *de minimis* thresholds as established under the CAAA. Consequently, the Proposed Action will be presumed to conform to the Michigan SIP and further analysis will not be required under the CAAA, pursuant to 40 CFR Part 93.

National Environmental Policy Act

Under NEPA, the impact of the Proposed Action on air quality will be assessed by evaluating the impact of the Proposed Action on the National Ambient Air Quality Standards (NAAQS). The NAAQS are pollutant concentrations (pollutant mass per volume of air in parts per million) established to define maximum healthful levels of pollutants in the ambient air over a period of time. Normally, no further analysis is required when annual net emissions are shown not to exceed any of the threshold levels established under the General Conformity Rule of the CAAA.[4] The emissions inventory summary presented in **Table 3** shows that the annual emissions resulting from construction of the Proposed Action will not exceed applicable *de minimis* threshold for the noted pollutant. Consequently, the disclosures made for the demonstration of *de minimis* emissions is sufficient to satisfy compliance under NEPA and CAAA requirements.

[4] FAA Order 1050.1E (June 8, 2004) Environmental Impacts: *Policies and Procedures*.

Table 3: Construction Emissions Inventory

ACTIVITY	EQUIPMENT	QUANTITY	2007					
			HC (environmental quantity)	VOC (environmental quantity)	CO (environmental quantity)	NOx (environmental quantity)	PM10 (environmental quantity)	SO2 (environmental quantity)
PCCP Demo and Removal	Concrete Breaker	2	0.0034	0.0035	0.0160	0.0226	0.0078	0.0031
	Track mounted Backhoe	3	0.0065	0.0067	0.0590	0.0391	0.0164	0.0037
	Backhoe	1	0.0032	0.0033	0.0140	0.0160	0.0164	0.0019
	966 (Loader)	4	0.0035	0.0034	0.0175	0.0192	0.0656	0.0013
	Water Truck	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.0365	0.0365	0.1937	[illegible]	[illegible]	[illegible]
PCCP Grinding and Removal	Grinding Machine	1	0.0028	0.0028	0.0117	0.0350	0.0165	0.0043
	Motor Grader	1	0.0037	0.0039	0.0169	0.0526	0.0080	0.0079
	Paddle Wheel Scraper	1	0.0062	0.0066	[illegible]	[illegible]	[illegible]	0.0149
	Water Truck	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.0339	0.0357	[illegible]	[illegible]	[illegible]	[illegible]
Clear and Grub	Dozer	1	[illegible]	[illegible]	0.0224	0.0705	0.0345	0.0088
	623 Paddle Wheel Scraper	3	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.0236	0.0246	[illegible]	0.3327	0.0491	[illegible]
AC Demo and Removal	Grinder	1	0.0026	[illegible]	0.0117	0.0350	0.0166	0.0043
	18 Wheel Haul Trucks	10	0.2158	[illegible]	[illegible]	[illegible]	0.1548	[illegible]
	Water Truck	1	0.0214	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.2378	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Unclassified Excavation	Track mounted Backhoe	2	0.0063	[illegible]	[illegible]	0.0501	0.0164	0.0037
	Grader	1	0.0037	0.0039	0.0169	0.0526	0.0080	0.0079
	Water Truck	1	0.0214	0.0215	[illegible]	[illegible]	[illegible]	[illegible]
	18 Wheel Haul Trucks	12	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.2690	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
PCCP Crushing	Crusher	1	0.0028	[illegible]	0.0117	0.0350	0.0165	0.0043
	Loader	1	0.0032	[illegible]	0.0140	0.0160	0.0164	0.0019
	D-8 Dozer	1	0.0048	[illegible]	0.0284	0.0705	0.0345	0.0088
	Water Truck	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.0326	0.0337	[illegible]	0.5616	[illegible]	[illegible]
Concrete Production	Batch Plant	1	0.0028	0.0028	0.0117	0.0350	0.0166	0.0043
	966 Loader	1	0.0032	0.0033	0.0140	0.0160	0.0164	0.0019
	18 Wheel Haul Trucks	8	0.1710	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	Water Truck	1	0.0214	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.1962	0.2787	[illegible]	[illegible]	[illegible]	[illegible]
Concrete Placement	Paver	1	0.0023	0.0025	0.0125	0.0284	0.0172	0.0042
	Spreader	1	0.0032	0.0033	0.0140	0.0160	0.0164	0.0019
	10 Wheel End Dumps (10-12)	12	[illegible]	0.0182	0.0376	[illegible]	[illegible]	[illegible]
	Loader	1	0.0032	0.0033	0.0140	[illegible]	[illegible]	[illegible]
			0.0184	0.0184	[illegible]	0.0915	0.0437	0.0119
Existing Base/Subgrade Preparation	Grader	1	0.0037	0.0039	0.0168	0.0526	0.0080	0.0079
	Steel Drum Vibratory Compactor	1	0.0032	0.0032	0.0097	0.0418	0.0059	0.0061
	623 Paddle Wheel Scraper	2	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.0298
	Water Truck	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.0577	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Place 6" ATPB	AC Paver	1	0.0023	0.0025	0.0125	0.0284	0.0172	0.0042
	Skip Loader	1	0.0032	0.0033	0.0140	[illegible]	0.0164	[illegible]
	Steel Drum Roller	1	0.0038	0.0038	[illegible]	[illegible]	0.0135	0.0059
	Triple Transfer Trucks (9-11)	11	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	Water Truck	1	0.0214	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

ACTIVITY	EQUIPMENT	QUANTITY	2007					
			HC (ton/6months) quantity	VOC (ton/6months) quantity	CO (ton/6months) quantity	NOx (ton/6months) quantity	PM10 (ton/6months) quantity	SO2 (ton/6months) quantity
Place 5" AC (Shoulder)	AC Paver	1	0.0023	0.0025	0.0126	0.0284	0.0172	0.0042
	Steel Drum Roller	2	0.0036	0.0038	0.0217	[illegible]	0.0155	0.0056
	Rubber Tire Roller	1	0.0018	0.0019	[illegible]	0.0281	0.0135	0.0026
	Triaxle Transfer Trucks (9-11)	11	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	Skid Loader	1	0.0032	[illegible]	0.0140	[illegible]	0.0164	[illegible]
	Water Truck	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Place Recycled PCCP Aggregate Base	Haul Trucks	4	0.0032	0.0034	0.0125	[illegible]	0.0038	0.0013
	Steel Drum Vibratory Compactor	2	0.0005	0.0005	0.0093	[illegible]	[illegible]	0.0002
	Motor Grader	1	0.0037	[illegible]	[illegible]	[illegible]	[illegible]	0.0079
	Loader	2	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	Water Truck	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	633 Paddle Wheel Scraper	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Place Tack Coat	Boot Truck	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.0214	[illegible]	0.1[illegible]	0.3066	[illegible]	[illegible]
Place Subdrains	Backhoe	2	0.0065	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	Loader	1	0.0032	[illegible]	0.0140	[illegible]	[illegible]	[illegible]
	10 Wheel End Dumps (3-4)	4	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Painting	Utility Trucks	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.0513
	Sprayers	1	[illegible]	[illegible]	[illegible]	[illegible]	0.0044	[illegible]
			[illegible]	0.0233	0.1716	[illegible]	0.1562	[illegible]
Hydromulching	Water Truck	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			[illegible]	[illegible]	0.1288	[illegible]	[illegible]	[illegible]
Topsoiling	Dozer	1	[illegible]	0.0261	0.0284	[illegible]	[illegible]	[illegible]
	633 Paddle Wheel Scraper	2	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			[illegible]	0.0748	0.1663	0.5937	[illegible]	[illegible]
Place Lights/Conduit	Backhoe	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	Truck Mounted Coring Machines	1	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.0024
	Concrete Trucks (Slurry, Can Placement and PCC encased duct banks)	1	0.0214	[illegible]	0.1288	[illegible]	[illegible]	[illegible]
			0.0265	0.0279	0.1513	0.4199	0.1562	[illegible]
Miscellaneous	Utility Trucks	1	0.0214	0.0226	0.1288	[illegible]	0.1518	[illegible]
	Pickup Trucks	1	0.0214	0.0226	0.1288	[illegible]	[illegible]	[illegible]
	Boom Trucks	1	0.0214	[illegible]	0.1288	[illegible]	[illegible]	[illegible]
	Light Standards	1	0.0005	[illegible]	0.0018	[illegible]	[illegible]	[illegible]
	Generators	1	0.0006	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
			0.0652	0.0686	[illegible]	[illegible]	[illegible]	[illegible]
Total			[illegible]	1.7622	[illegible]	[illegible]	[illegible]	[illegible]

1 The total may not appear to represent the arithmetic sum due to rounding.

References: U.S. Environmental Protection Agency (USEPA), March 2006. *National Non-road Emissions Model Draft Version.* Kimley-Horn Associates

- **Coastal Barriers** – The Coastal Barrier Resources Act of 1982 requires that no new Federal expenditures or financial assistance may be made available for construction within the boundaries of the Coastal Barriers Resource System. There are no coastal barriers or areas subject to the Coastal Barrier Resources Act of 1982 in the vicinity of the Airport. Therefore, the Proposed Action will not impact coastal barriers.

- **Coastal Zone** – The Coastal Zone Management Act of 1972, as amended, provides for the preservation, protection, development, and where feasible, restoration or enhancement of the resources of the nation's coastal zone. The Airport is located in a Coastal Zone Management County; however the Airport is not located in the protection zone.

- **Compatible Land Use** – The Proposed Action will not change the land use of any portion of the Airport and is consistent with Federal, State, and local planning efforts as well as the current Airport Layout Plan (ALP) for Airport. The Proposed Action will occur entirely within the existing airfield, which is zoned for airport use. Therefore, the Proposed Action will not negatively impact on-Airport land use. When the Proposed Action is complete there will be no permanent impacts to compatible land use. Temporary impacts to land use associated with noise during the Proposed Action are discussed in the Noise category below.

- **Construction Impacts** – Construction impacts are the short-term temporary effects of the construction process that can usually be mitigated with proper construction management and the use of best management practices (BMP's), as outlined in FAA AC 150/5370-10B, *Standards for Specifying Constructions of Airports*. Potential construction-related impacts resulting from the Proposed Action could temporarily affect noise levels, air quality, and surface waters.

  Noise

  Noise levels will temporarily increase in the vicinity of vehicles and equipment involved in the construction process at the site of the Proposed Action and along haul roads leading to the site. However, because the Proposed Action is located on the airfield and is not immediately adjacent to residential development, the potential construction noise is not expected to be distinguishable from general background airport and existing traffic noise. The noise associated with on-airport construction will cease once construction of the Proposed Action has been completed.

  Access to the site by construction vehicles and materials delivery vehicles will result in short-term temporary increased noise levels along the local roads that lead to the site. This temporary impact will cease once construction of the Proposed Action has been completed.

  Air Quality

  Temporary air quality impacts could result from increased dust at the construction sites and along haul roads leading to the Proposed Action site. The discharge of dust at the construction site will be minimized by ground sprinkling practices during high-dust generating activities or extended dry periods.

Emissions from construction vehicles are discussed in the Air Quality section of this document. Those emissions will be kept to a minimum through the use of BMP's and adherence to local, state, and Federal air pollution regulations.

Surface Waters

Temporary impacts to surface water quality could result from erosion and siltation born from site disturbance activities at the site of the Proposed Action. The risk of impact to water quality will be minimized to the fullest extent possible through the use of BMP's specified in a Construction Erosion and Sedimentation Control Plan. Further, the Airport Authority has received approval from the Michigan Department of Environmental Quality (MDEQ) to discharge storm water from the construction activities and the contractor has responsibility to administer the permit with certified storm water operators. Also, the batch plant has a storm water general discharge permit issued under MDEQ's general permit program.

- **Section 4(f)** – Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended, provides protection for certain publicly-owned lands including parks, recreation areas, wildlife or waterfowl refuges, and historic sites listed or eligible for listing on the National Register of Historic Places. There are no Section 4(f) resource sites on or in the immediate vicinity of the Proposed Action, nor would there be any impacts to Section 4(f) sites. As such, there would be no impact to 4(f) sites as a result of implementation of the Proposed Action.

- **Farmlands** – The U.S. Department of Agriculture, Natural Resource Conservation Service, has classified soil groupings based on their suitability for agricultural use. The Farmland Protection Act of 1981 was enacted to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses.

  In Michigan, the National Resources Conservation Service (NRSC) classifies soil types as prime agricultural land. Unique farmlands do not have a separate distinction. The Project site is entirely within the current Airport property boundary. Although agricultural uses exist in the areas surrounding the Airport area, the area of the Proposed Action is currently paved and not fit for agricultural use. Therefore, the Proposed Action will not have an adverse impact on prime and unique farmland.

- **Fish, Wildlife and Plants** – The United States Fish and Wildlife Service (USFWS) indicated during past environmental studies that no federally listed species are present within the proposed development area.

  The Proposed Action will not adversely impact federally-listed or state-listed endangered, threatened, or special concern species. No species, individuals, concentrations, or critical habitats are known to occur in the area affected by the Proposed Action.

The Proposed Action will not adversely impact biotic communities at or in the vicinity of the Airport. The area affected by the Proposed Action is completely developed and is surrounded on all sides by urban land uses typical of a major airport. Based on these conditions, no wildlife or indigenous plant communities occur in this area.

- **Floodplains** – The Proposed Action will not be constructed in any 100-year floodplain. Therefore, the Proposed Action will not affect designated 100-year floodplain areas.

- **Hazardous Materials** – The Proposed Action will not generate an unmanageable volume of solid waste, affect the Airport Authority's existing solid waste management program, or create hazardous materials. The Proposed Action will not significantly impact the volume of solid waste generated within the Airport property because the Proposed Action will not affect the number of passengers using the facilities.

- **Historic, Architectural, Archaeological, and Cultural** – The Proposed Action will not require the acquisition or relocation of off-airport historic, architectural, archaeological, and cultural resources. The site of the Proposed Action has been developed and redeveloped and as such no extant resources exist in the area.

- **Light Emissions and Visual Effects** – FAA Order 5050.4B requires that the extent of lighting associated with an airport action that could cause a nuisance or annoyance to people surrounding the airport be evaluated. Airport related light emissions are only considered to have notable impact if light is directed towards a residential area. The lighting associated with the Proposed Action will only replace existing lighting and will not include new or additional lighting. The Proposed Action will occur entirely within the airport property and will not impact residential areas adjacent to the Airport.

- **Natural Resources and Energy Supply** – This section describes the assessment of the consumption of energy and natural resources for the Proposed Action. The assessment was conducted to determine whether there would be major changes in the demand for energy or natural resources that will have a significant measurable effect on local supplies due to the implementation of the Proposed Action.

  Natural Resources

  The construction of the Proposed Action will not require the development of previously undeveloped land. It is not anticipated that the construction of the Proposed Action will destroy or deplete the supply of natural resources such as oil, coal, minerals, or trees. Further, rehabilitation or operation of the existing runway will not involve a need for unusual materials or materials in short supply. Rather, the Proposed Action takes advantage of using local waste materials as constituents in

the manufacturing of concrete. Therefore, the use of natural resources was not further evaluated.[3]

Energy Supply

There are two major types of energy consumers at an airport – stationary facilities and aircraft operations. Stationary airport facilities use electricity and natural gas (utility power) to cool, light, and heat buildings and structures such as terminal buildings, passenger concourses, administrative offices, parking lots, and the airfield. Aircraft operations consume a combination of aircraft fuel, gasoline, and diesel fuel to operate aircraft and ground support equipment (GSE).

The Proposed Action will not affect stationary facilities nor will it affect the number of annual aircraft operations at the Airport. Therefore, there will be no impact to the demand for aircraft fuel or gasoline and diesel fuel for ground support equipment.

- **Noise**

This section discusses the anticipated changes in aircraft noise exposure resulting from implementation of the Proposed Action and the No Action alternative. Aircraft-related noise exposure for both alternatives has been defined through the use of noise contours prepared with the Federal Aviation Administration's (FAA's) Integrated Noise Model (INM). These contours are presented using the Day-Night Average Sound Level (DNL) noise contour metric.

No Action

The future No Action noise conditions associated with aircraft activity at the Airport was analyzed based upon operational conditions anticipated in the year 2007. These conditions, including aircraft type, flight tracks and arrival/departure procedures are consistent with existing conditions. Aircraft operational levels were identified from the forecast used in the FAR Part 150 Update. The forecast data shows a total of 606,720 operations are anticipated to occur at the Airport in 2007. These operational levels are consistent with the FAA's Terminal Area Forecast. The No Action alternative assumes that continued pavement patching would occur at the Airport to keep Runway 3R-21L open for the majority of the year. This patching is consistent with ongoing maintenance and is expected to result in closure of Runway 3R-21L for a total of approximately 30 days between the hours of 7:00 AM and 10:00 PM and 60 nights during the hours between 10:00 PM and 7:00 AM.

Future noise contours were developed using the Day-Night Average Sound Level (DNL) noise metric as required by the FAA. The future annual No Action and Proposed Action 2007 DNL noise exposure contours for the Airport are presented in

[3] FAA Order 5050.4B, *The National Environmental Policy Act (NEPA) - Implementing Instructions for Airport Action*, April 28, 2006

Figure 1, showing the 60 DNL, 65 DNL, 70 DNL, and 75 DNL noise exposure contours. Table 4, *Area Exposed to Various Noise Levels (in square miles) Future 2007 No Action and With Proposed Project DNL Noise Exposure Contours* provides the total area (in square miles) exposed to noise levels in each contour band, as well as cumulatively. The following section discusses the uses of the land within each of the noise exposure contours and the compatibility of the land use with the noise exposure.

Table 4: Area Exposed to Various Noise Levels (in square miles)
Future 2007 No Action and With Proposed Project DNL Noise Exposure Contours

Noise Level	No Action	Proposed Action	Project-Related Change
60-65 DNL	16.39	16.56	0.17
65-70 DNL	7.49	7.92	0.43
70-75 DNL	3.81	3.89	0.08
75+ DNL	2.39	2.21	-0.18
65 DNL & Greater	13.69	14.02	0.33
60 DNL & Greater	30.08	30.58	0.50

Source: *EnviroNet International*

Proposed Action

Noise increases will result from different runways being used while Runway 3R-21L is closed for 175 days for rehabilitation. After the rehabilitation is completed historical use of Runway 3R-21L will be restored. Runway 3R-21L will be reconstructed to its original length, width and strength and will not result in increases in operations or changes in types of aircraft using the runway.

The FAA's noise model studies annual changes in noise. Because of this, any changes in noise that would occur during the 175 day duration of the Proposed Action are presented as an annualized noise impact. The future Proposed Action noise environment for the Airport was analyzed based upon forecast operational conditions in the year 2007. Aircraft operating characteristics, operational levels and aircraft fleet mix would remain the same as the No Action alternative. With implementation of the Proposed Action, assumptions such as time of day, flight tracks and flight track usage and procedures remain the same as with the existing conditions for 190 days, while the remaining 175 days of the 365 days in 2007 would reflect the necessary changes to runway use and flight track use. No new flight tracks would be utilized during the Proposed Action.

Based upon conversations with the FAA Airport Traffic Control Tower at the Airport, runway use during the Proposed Action was estimated, and then in accordance with the DNL metric requirement, annualized assuming the remaining 190 days of existing conditions use. During the Proposed Action, Runway 3R-21L would be

closed and the Runway 9R-27L would be used to supplement the capacity of the remaining parallel runways during peak hours and the shoulder periods leading up to and following the peak hours. Runway 9R-27L would not be used with great frequency during low activity periods. During those times, flights that would normally operate on Runway 3R-21L would be placed on one of the three operating parallel runways.

During the Proposed Action, the use of existing flight tracks on the operating runways would be increased to accommodate the redistributed operations. In particular, there would be a greater use of flight tracks to and from Runway 9R-27L and increased used of Runway 3L departures to reflect a greater use of west bound flight tracks during the Proposed Action.

It is important to note that once the Proposed Action is completed, runway use and flight track use would return to pre-Proposed Action usage. The completion of the Proposed Action would not effect the operation of the Airport beyond the timeframe of the Proposed Action and would not result in any increases in the number of operations at the airport, type of aircraft using the airport or different use of flight tracks.

Figure 1 indicates areas within the 65 DNL or greater contour where the Proposed Action would increase noise levels by 1.5 DNL or more when compared to the No Action alternative. FAA Order 1050.1E 1E *"Environmental Impacts: Policies and Procedures"* identifies project-related thresholds of significance and notes that areas exposed to increases of 1.5 DNL within the 65 DNL contour are considered potentially significantly impacted by the Proposed Action (if the land uses are noise sensitive). The following section discusses the land use characteristics in the area that could experience a 1.5 DNL increase.

Land Use

FAA Order 1050.1E *"Environmental Impacts: Policies and Procedures"* notes that the compatibility of existing and planned land uses in the vicinity of an airport is usually associated with the extent of the noise resulting from aircraft operations. The noise analysis concluded that noise impacts may occur because the Proposed Action would result in temporary noise impacts in excess of 1.5 DNL. This section describes the land uses around the Airport and provides a description of the non-compatible uses within the future No-Action and Proposed Action noise contours. Additionally, an analysis has been prepared describing the land uses that would be subject to an increase in noise levels equal to or in excess of 1.5 DNL inside the 65 DNL noise contours as a result of the Proposed Action.

To determine the acceptability of land uses with specific noise levels, the FAA has adopted land use compatibility guidelines, based on the Day-Night Average Sound Level (DNL). **Table 5**, *Land Use Compatibility with Yearly Day-Night Average Sound Level* lists the land use compatibility guidelines, adopted in 40 CFR Part 150, which

notes that residences and certain public-use facilities are not compatible with high levels of aircraft noise. These Federal guidelines show that residential land uses are normally not compatible with noise levels in excess of 65 DNL. With appropriate sound attenuation, however, residential structures may be compatible with noise exposure levels of 65 to 75 DNL. Other noise-sensitive land uses such as medical, educational, religious, and cultural facilities, areas of public assembly, resorts, and group camps follow these same patterns of compatibility.

The Airport Authority is, in accordance with 49 USC 47107(a)(10), formerly section 511(a)(5) of the 1982 Airport Act, taking appropriate actions 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 landing and takeoff of aircraft. The Airport Authority has an approved Part 150 Noise Compatibility program and is currently in the process of preparing a full update to the Part 150 Noise Compatibility document and recommendations.

Table 5: Land Use Compatibility with Yearly Day-Night Average Sound Level

Land Use	Yearly day-night average sound level (DNL) in decibels					
	< 65	65-70	70-75	75-80	80-85	>85
Residential						
Residential, other than mobile homes and transient lodgings	Y	N (1)	N (1)	N	N	N
Mobile home parks	Y	N	N	N	N	N
Transient lodgings	Y	N (1)	N (1)	N (1)	N	N
Public Use						
Schools	Y	N (1)	N (1)	N	N	N
Hospitals, nursing homes	Y	25	30	N	N	N
Churches, auditoriums, and concert halls	Y	25	30	N	N	N
Government services	Y	Y	25	30	N	N
Transportation	Y	Y	Y (2)	Y (3)	Y (4)	Y (4)
Parking	Y	Y	Y (2)	Y (3)	Y (4)	N
Commercial Use						
Offices, business and professional	Y	Y	25	30	N	N
Wholesale and retail- building materials, hardware and farm equipment	Y	Y	Y (2)	Y (3)	Y (4)	N
Retail trade-general	Y	Y	25	30	N	N
Utilities	Y	Y	Y (2)	Y (3)	Y (4)	N
Communication	Y	Y	25	30	N	N
Manufacturing and Production						
Manufacturing, general	Y	Y	Y (2)	Y (3)	Y (4)	N
Photographic and optical	Y	Y	25	30	N	N
Agriculture (except livestock) and forestry	Y	Y (6)	Y (7)	Y (8)	Y (8)	Y (8)
Livestock farming and breeding	Y	Y (6)	Y (7)	N	N	N
Mining and fishing, resource production and extraction	Y	Y	Y	Y	Y	Y
Recreational						
Outdoor sports arenas and spectator sports	Y	Y (5)	Y (5)	N	N	N
Outdoor music shells, amphitheaters	Y	N	N	N	N	N
Nature exhibits and zoos	Y	Y	N	N	N	N
Amusements, parks, resorts, and camps	Y	Y	Y	N	N	N
Golf courses, riding stables and water recreation	Y	Y	25	30	N	N

Numbers in parenthesis refer to notes; see continuation of Table 16 for notes and key.

The designations contained in this table do not constitute a Federal determination that any use of land covered by the program is acceptable or unacceptable under Federal, State, or local law. The responsibility for determining the acceptable and permissible land uses and the relationship between specific properties and specific noise contours rests with the local authorities. FAA determinations under Part 150 are not intended to substitute Federally determined land uses for those determined to be appropriate by local authorities in response to locally determined needs and values in achieving noise compatible land uses.

Key to **Table 5**

Y (YES)	Land Use and related structures compatible without restrictions.
N (NO)	Land Use and related structures are not compatible and should be prohibited.
NLR	Noise Level Reduction (outdoor to indoor) to be achieved through incorporation of noise attenuation into the design and construction of the structure.
25, 30, or 35	Land use and related structures generally compatible; measures to achieve NLR of 25, 30 or 35 dB must be incorporated into design and construction of structure.

Notes for **Table 5**

(1)	Where the community determines that residential or school uses must be allowed, measures to achieve outdoor to indoor Noise Level Reduction (NLR) of at least 25 dB and 30 dB should be incorporated into building codes and be considered in individual approvals. Normal residential construction can be expected to provide a NLR of 20 dB, thus, the reduction requirements are often stated as 5, 10 or 15 dB over standard construction and normally assume mechanical ventilation and closed windows year round. However, the use of NLR criteria will not eliminate outdoor noise problems.
(2)	Measures to achieve NLR of 25 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise sensitive areas or where the normal noise level is low.
(3)	Measures to achieve NLR of 30 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise sensitive areas or where the normal noise level is low.
(4)	Measures to achieve NLR of 35 dB must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise sensitive areas or where the normal noise level is low.
(5)	Land use compatible provided special sound reinforcement systems are installed.
(6)	Residential buildings require an NLR of 25.
(7)	Residential buildings require an NLR of 30.
(8)	Residential buildings not permitted.

(end of Table 5)

Source: Ricondo Dorfenberg & Company

No Action Impacts

A review was conducted of the land uses that could be affected by noise with the No Action alternative. The No Action alternative assumes that routine and emergency maintenance, including patching, would occur at the Airport, and reflects the forecast operations and aircraft types anticipated to occur in 2007. The No Action alternative aircraft noise exposure contours are slightly smaller than the existing noise contours as a result of the increasing number of quieter aircraft that are forecast to be

operating in the future. The 65 DNL and greater noise contour is expected to contain approximately 8,765 acres of total land. Approximately 420 residential units with about 920 residents/people would be within the 65 DNL and greater noise contour with the No Action alternative. Of these, all but 30 homes have been offered sound attenuation. The No Action 65 DNL contour would encompass approximately 335 acres of residential land. Similar to the existing conditions, the largest categories of land use that would be affected consist of transportation/utilities and open space/agriculture land uses (3,853 acres and 3,550 acres, respectively – or about 85 percent of the total area within the 65 DNL and greater noise contour). Table 6, *Land Use Analysis, No Action and Proposed Action* list the various existing land uses that are expected to be within the No Action alternative noise contour.

Table 6: Land Use Analysis, No Action and Proposed Action

	65 DNL & Greater			70 DNL & Greater		
Land Use	No Action	Proposed Action	Project-Related Change	No Action	With Proposed Action	Project-Related Change
People	920	1,140	220	40	20	20
Housing Units[a]	420	520	100	20	10	10
Churches	0	0	0	0	0	0
Schools	0	0	0	0	0	0
Land Use (acres)						
Residential	335 Ac	382 Ac	47 Ac	8 Ac	6 Ac	2 Ac
Transportation/Utilities	3,853 Ac	3,934 Ac	81 Ac	2,814 Ac	2,821 Ac	7 Ac
Commercial	468 Ac	476 Ac	8 Ac	115 Ac	112 Ac	3 Ac
Industrial	450 Ac	475 Ac	25 Ac	51 Ac	24 Ac	26 Ac
Water	56 Ac	53 Ac	-7 Ac	19 Ac	18 Ac	1 Ac
Institutional	12 Ac	14 Ac	2 Ac	0 Ac	0 Ac	0 Ac
Open/Agriculture	3,582 Ac	3,632 Ac	50 Ac	961 Ac	928 Ac	-33 Ac
Total Acres	8,765 Ac	8,966 Ac	201 Ac	3,968 Ac	3,909 Ac	59 Ac

Source: *Aerial Photography and Land Use Base Map, SEMCOG; 2000 Census Data; BDC Analysis.*
Note – population and housing have been rounded to the nearest 10.
[a] All but approximately 30 homes within the 65 – 70 contour band have been offered sound attenuation.

Proposed Action Impacts

The Proposed Action alternative reflects the same level of airport activity as the No Action alternative, but includes runway use changes during April through October (175 days) of 2007 that would be necessary in order to complete the Proposed Action. Following completion of the Proposed Action, runway use would return to pre-project conditions. The Proposed Action 65 DNL and greater noise contour would encompass about 8,966 acres of land. Approximately 520 residential units

with about 1,140 residents/people would be within the 65 DNL and greater noise contour with the Proposed Action alternative. The Proposed Action 65 DNL contour would encompass approximately 382 acres of residential land.

Comparison of Proposed Action and No Action Impacts

Table 6 may be used to compare the No Action land use impacts to the Proposed Action land use impacts. It shows 100 more housing units would be within the 65 DNL or greater contour for the Proposed Action (520 housing units with the Proposed Action compared to 420 housing units with the No Action). Table 6 also shows 10 less housing units would be within the 70 DNL or greater contour for the Proposed Action (10 housing units with the Proposed Action compared to 20 housing units with the No Action). This translates to about 220 more people being within the 65 DNL or greater contour for the Proposed Action (1,140 people with the Proposed Action compared to 920 people with the No Action) and 20 less people being within the 70 DNL or greater contour for the Proposed Action (20 people with the Proposed Action compared to 40 people with the No Action). The 65 DNL or greater contour contains 47 acres more of residential land use with the Proposed Action than with the No Action, while the 70 DNL or greater contour contains 2 acres less of residential land use with the Proposed Action than the No Action. Other land use impacts are similarly presented in Table 6.

Approximately 110 homes would be newly within the 65 DNL contour with implementation the Proposed Action when compared to the No Action Alternative. Of the 110 homes newly within the 65 DNL contour, 55 of those would not be subjected to a 1.5 DNL increase. Of the remaining 45 homes that would be subjected to noise increases of 1.5 DNL or greater:

- 30 homes have already been sound attenuated to 70 DNL or greater sound levels, and are therefore considered compatible
- 10 homes have been offered sound attenuation but either; 1) the homeowner did not wish to participate in the voluntary program or 2) the homeowner could not, or would not, make the home compliant with the local building code, which is a prerequisite to participate in the sound attenuation program
- 5 homes have not previously been offered sound attenuation

No churches or schools are located in the future 65 DNL and greater contours for either the No Action or the Proposed Action.

As shown in Figure 1, the Proposed Action would result in a 1.5 DNL increase in average annual noise exposure to an area north of the Airport in the City of Romulus, north of Interstate 94. This area north of the Airport would experience an increase as aircraft that would normally land on Runway 3R-21L, but during the maintenance project would land on other operating parallel runways. The Proposed

Action would also result in a 1.5 DNL increase in noise to an area east of the Airport in the City of Romulus, east of Harrison Road. This area east of the Airport would experience increased noise due to use of the crosswind Runway 9R-27L during high demand periods.

Analysis of Impacts Resulting from the Proposed Action Alternative

FAA Order 1050.1E Appendix A.14.3 states that "a significant noise impact would occur if analysis shows that the proposed action will cause noise sensitive areas to experience an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure when compared to the no action alternative for the same timeframe". It should be noted that with the Proposed Action the temporary changes in flight track usage to accommodate the construction project would be temporary.

In accordance with the 1992 FICON (Federal Interagency Committee on Noise) recommendations, an examination of noise levels between DNL 65 and 60 DNL has been conducted because of the potential 1.5 DNL increase within the 65 DNL. Disclosure of impacts having a 3 DNL increase with a proposed action over the No Action is for information purposes only. Per FAA Order 1050.1E, for FAA environmental analysis, those 3 DNL increases do not result in significant adverse noise impacts below the 65 DNL contour.

Between the 60 and 65 DNL noise contours, approximately 890 homes or 2,390 people would experience a noise increase of 3 DNL or greater as a result of the Proposed Action. As shown in **Figure 1**, the areas or 3 DNL increase between the 60 and 65 DNL would be located east of the Airport in the cities of Romulus and Taylor. Disclosure of impacts having a 3 DNL increase with a proposed action over the No Action is for information purposes only. Per FAA Order 1050.1E, for FAA environmental analysis, those 3 DNL increases do not result in significant adverse noise impacts below the 65 DNL contour.

Mitigation Measures

It is important to reiterate that the planned duration of the Proposed Action is 175 days and that the runway use would return to normal (pre-project use) upon completion of the Proposed Action. Therefore, the project-related impacts, (noise in excess of 1.5 DNL), are temporary and will be reversed at the completion of the construction. Despite the conditions being temporary, the Airport Authority has evaluated all possible means to reduce or mitigate the effects of the Proposed Action.

The Airport Authority and FAA have incorporated all practicable mitigation into the Proposed Action. Specifically, the Airport Authority has coordinated with the FAA Airport Traffic Control Tower staff to consider alternative runway use programs to avoid or reduce changes that would result in the noise effects of a 1.5 DNL increase without compromising safety and national airspace system efficiency. The Proposed

Project would result in closure of Runway 3R-21L during the entire 175 days. Aircraft operations normally using that runway would be directed by FAA Airport Traffic Control Tower staff to one of the other available runways during both takeoff and landings. Currently the dominant runway use patterns result in the parallel runways being used for arrivals and departures. The crosswind runways (Runway 9R-27L and Runway 9L-27R) are only used when wind and weather require their use; currently Runway 9R-27L is primarily used about two percent of the time annually when weather and wind dictates.

During the runway rehabilitation program, three parallel runways and a crosswind runway would be available (the north crosswind will be closed as part of the construction). Demand at the Airport periodically requires two or three arrival runways and two departure runways. Thus, with implementation of the Proposed Action, the crosswind Runway 9R-27L would be used daily during these peak demand periods during the 175 day period. The noise impacts associated with that use are reflected in the Proposed Action analysis discussed previously.

Consideration was given to not using the crosswind during the Proposed Project. However, without the use of the crosswind runway, aircraft operating delays and congestion would result, which would also potentially produce delays not only at the airport but also in the national airspace system. As noted by the analysis of the Proposed Action, even with the use of the crosswind runway, a temporary 1.5 DNL increase in noise would occur to areas north of the Airport due to the reallocation of activity on the existing parallel runways.

If no use of the crosswind runway were to occur, a slightly greater increase in impact (relative to the Proposed Action) would be expected to the areas to the north. Aircraft operating delays would possibly result in more activity occurring during the early morning hours and late evening hours, which based on the use of the DNL metric, would also increase the size of the noise exposure contours. This is because the noise model includes a 10 dBA penalty for sounds occurring during the nighttime hours. This impact was expected to be greater than that of the Proposed Action and thus, was not considered prudent.

Consideration was also given to noise insulation of homes that would be included in the 65 DNL and greater contour during the 175 day construction period. As described above, of the approximately 45 homes that would be subjected to a temporary noise increases of 1.5 DNL or greater, all but 5 homes to the east of the airport have already been offered sound attenuation. The Airport is cognizant of the noise impacts associated with the construction and the potential effect, however, does not deem sound insulation as being appropriate mitigation for temporary impacts of such a limited duration.

As no prudent airport operational measures were identified for the 175 days, consideration was given to land use compatibility actions that could be taken to mitigate the adverse noise effects. As a result of the 1993 Noise Compatibility Plan,

the Airport Authority has offered sound insulation to the majority of homes within the existing 65 DNL contour, including most of those that would be affected by the Proposed Project. Homes subject to the highest noise levels were acquired and residents relocated. This effort has provided great benefit to the communities and residences most impacted by aircraft noise by providing the means and opportunity to relocate to areas that are not impacted by noise. It also has allowed surrounding communities to implement compatible and appropriate land uses adjacent to airport property that were once incompatible with airport generated noise. Additionally, an update to the Part 150 program is currently underway, which may provide additional noise reduction opportunities to residence around the Airport through operational changes or other means. Nonetheless, these ongoing efforts under Part 150 are not directly related to this environmental review and future mitigation measures beyond those described above cannot be guaranteed or approved at this time nor would the ongoing study result in changes during 2007.

The Airport Authority and FAA have considered all possible means to minimize the temporary noise effects. As this discussion indicates, there are no prudent and feasible actions available to further minimize the anticipated effects of the Proposed Action. At the end of the project the noise contours will return to their previous state.

Temporary changes to runway use have occurred consistently over the years during the normal course of airport maintenance and operational requirements. However, they have not involved a closure of this duration. Because of the amount of time the Proposed Action would take to complete (approximately 175 days), the Airport Authority has initiated a public notification and outreach effort to ensure all affected communities and citizens are made aware of the maintenance project and the temporary changes in noise exposure that will result. The Airport Authority has been briefing local community officials and engaging local press outlets to disseminate information. Additionally, as part of this environmental document, the Airport Authority will be conducting additional community outreach to ensure that the public and potentially affected residents are aware of the project. This will include updates on the progress made on the reconstruction of Runway 3R-21L as it occurs.

- **Socioeconomic, Environmental Justice, and Children's Health and Safety Risks** –

Socioeconomic Issues

The Proposed Action will occur within the existing Airport property and therefore will not create social impacts such as the relocation of residences or businesses, alteration of surface transportation patterns on local roadways, disruption of established communities, or disruption of orderly, planned development. The Proposed Action will not directly or indirectly increase or decrease the need for airport employees.

The Proposed Action will not affect regional growth and development patterns compared to a No Action because the runway would remain operational in 2007 in both scenarios. There is no anticipated increase or reduction in the number of permanent jobs at the Airport as a result of the Proposed Action. Therefore, no induced socioeconomic impacts will result from the Proposed Action.

Environmental Justice Issues

This section addresses Environmental Justice issues and the assessment related to determining if minority and/or low-income populations would be disproportionately adversely impacted by the Proposed Action.

The populations within the existing 65 DNL contour and areas exposed to a 1.5 DNL noise level increase were assessed using U.S. Census track and block data. Census tracks are large geographic areas with population, race, age, household income, and other population information aggregated for the area. Census tracks are further subdivided into smaller units (i.e. Census blocks) that have population, race, and age information aggregated for the block; however, household income information is not publicly available for Census blocks. The analysis conducted considered the Proposed Action's impact in terms of the population ethnicity and household income.

No-Action Alternative

The population surrounding Detroit Metropolitan Wayne County Airport is primarily working class with the majority being of White ethnicity. Within the 2007 no-action alternative 65 DNL noise contour, approximately 74 percent of the population is of White ethnicity and approximately 21 percent is of Black or African American ethnicity. The remaining five percent is mixed between Hispanic, Native American, Asian, and mixed ethnicity. The medium household income for all homes within the 2007 no-action alternative 65 DNL noise contour is $45,904. Approximately 10 percent of the households within the 2007 no-action alternative 65 DNL noise contour have annual incomes less than the national poverty level of $15,577 for a three person household.[6]

Proposed Action Alternative

As described in the Noise and Land Use sections of the Environmental Assessment, average annual noise levels would increase by 1.5 DNL or greater for specific areas within the City of Romulus during the rehabilitation of Runway 3R/21L. An analysis was conducted for all Census tracks and blocks that would experience a 1.5 DNL noise increase to assess if those populations exposed to a 1.5 DNL increase differ

[6] Note: While the household income data used in this analysis came from the 2000 Census, the 2007 poverty threshold was used in order to provide a more conservative estimate of poverty in the area surrounding the Airport.

substantially from those populations exposed to 65 DNL and greater noise levels under the No-Action alternative.

The areas that would be exposed to a 1.5 DNL increase as a result of the Proposed Action have a population comprised of approximately 91 percent White ethnicity and four percent Black or African American ethnicity. The remaining five percent is comprised of mixed and Hispanic ethnicity. The average household income within areas of 1.5 DNL increases is approximately $44,217, with 13 percent of the households earning less than national poverty levels.

The Proposed Action would not disproportionately impact minority or low income populations. Areas that would experience a temporary noise increase as a result of the Proposed Action are not comprised of populations that significantly vary from those currently exposed to noise levels of 65 DNL or greater.

As the Proposed Action will occur entirely within the airport's existing boundary and based on the analysis described above, the Proposed Action will not create disproportionately high or adverse human health or environmental effects on minority and low-income populations. Therefore, no Environmental Justice impacts are foreseen as a result of the Proposed Action.

Children's Health and Safety Risks

The Proposed Action will occur entirely within the airport's existing boundary and the Project's water quality and air quality impact will be minimal. Therefore, no increased risk to children's health and/or safety is anticipated.

- **Solid Waste** – The Proposed Action will create solid waste from construction debris (primarily crushed concrete and asphalt grindings) generated during the demolition process. This debris will be stored on-site and reused for improving and maintaining haul routes, perimeter service roads and other needed construction projects as deemed appropriate in the future. The Proposed Action will also use certain waste products, blast furnace slag and recycled asphalt, generated in southeast Michigan as ingredients used in the concrete and asphalt materials. The contractor will have the responsibility of arranging transportation and disposal of waste generated during the demolition of the existing runway as well as waste generated during construction of new runway. There is adequate landfill space available for this waste.

- **Water Quality** – The project site for the Proposed Action has been screened for water resources and evaluated in terms of potential impacts to surface and groundwater water quality, stormwater, sanitary and wastewater management, and water supply and use. Following is a summary of the evaluation results for each of these elements.

Surface Water Quality

The Airport is located within the upper reaches of two drainage basins: The Frank & Poet Drain and the Sexton-Kilfoil Drain. The headwaters of both drains are in the City of Romulus, upstream of the Airport.

The Proposed Action will not have a significant adverse affect on the Frank & Poet Drain or the Sexton-Kilfoil Drain because the drains are located in excess of 500 feet from the runway. Further, the Proposed Action does not involve large earth disturbance areas and therefore is not likely to impact water quality, particularly sediments, during and shortly after precipitation throughout the construction phase. Construction activities will not alter drainage patterns and permeability within the basin. The Proposed Action has been reviewed and approved through the Airport Authority's National Pollutant Discharge Elimination System (NPDES) Permit by the Michigan Department of Environmental Quality (MDEQ) to discharge storm water from the construction activities.

To avoid and minimize risk of impact to surface water resources adjacent to the site during construction, the contractor will be required to implement best management practices in accordance with FAA Advisory Circular (AC) 150/5370-10B, *Standards for Specifying Construction of Airports*.

The Proposed Action will add minor additional non-permeable surface area to the Airport in order to comply with FAA airport design standards. This includes expansion of the existing blast pads and a taxiway fillet. All of the paved areas associated with the Proposed Action, including the minor expansions, drain into the Airport's system of detention basins. The incremental additional volume of runoff can be accommodated within the existing detention basins and will not alter drainage patterns or permeability within the basin. Therefore, no change in the amount or characteristics of discharge from the airport into the surrounding surface waters is expected as a result of the Proposed Action.

Groundwater Quality

Neither the construction nor operation of the Proposed Action will affect existing groundwater reserves in the vicinity of the Airport. To avoid potential impact to groundwater resources, the Proposed Action will be constructed in conformance with the best management practices of FAA AC 150/5370-10B, *Standards for Specifying Constructions of Airports*. Furthermore, the Airport Authority will oversee compliance with the terms of the order pertaining to stormwater discharges issued by the State.

Stormwater, Sanitary, and Wastewater Management

Section 402(p) of the Clean Water Act (CWA) requires the U.S. Environmental Protection Agency (EPA) to develop permit requirements and issue permits for

discharges associated with industrial activity. In 1988, the EPA published a Notice of Proposed Rulemaking that further defined industrial activity to include airports, which have vehicle maintenance shops, material handling facilities, equipment cleaning operations or, airport deicing operations.

The Proposed Action will not significantly effect sanitary and industrial wastewater generation. The number of passengers using the Airport Authority's facilities is projected to increase with or without the Proposed Action. The sanitary and industrial wastewater generated as a result of passenger activities or services provided for the passengers using the Airport will be directed to existing permitted airport interceptors.

Water Supply and Use

Wayne County has an abundance of water resources located either within the County or close to its border. The City of Detroit Water and Sewage Department (DWSD) provides water to the Airport and approximately 97 other communities. The Proposed Action may result in a temporary increase in demand for water due to needs for preparation of concrete and dust control, however this increased temporary demand is not expected to impact the water supply or its use.

- **Wetlands** – The Proposed Action will not impact wetlands. An independent consultant (Environmental Consulting & Technology (ECT) has evaluated the site affected by the Proposed Action and determined that there are areas of wetlands in the vicinity of the proposed batch plant and construction material storage areas (see **Appendix A**). However, there are adequate non-wetland (upland) areas to accommodate the batch plant and construction material storage in support of the Proposed Action. The sponsor has committed to delineate and avoid all wetlands in implementing the Proposed Action and will locate the batch plant and construction material storage areas outside of any wetlands. The Proposed Action will not impact any wetlands.

- **Wild and Scenic Rivers** – The Wild and Scenic Rivers Act provides protection for certain free flowing rivers which have "outstanding or remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values." No wild and scenic rivers, as designated by the U.S. Department of the Interior, National Park Service, are located in the vicinity of the Airport. Therefore, the Proposed Action will not impact wild and scenic rivers.

- **Cumulative Impacts** – The CEQ NEPA regulations (40 CFR 1508.7) define a cumulative impact as "...the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time." The cumulative impact analysis for this Environmental Review was conducted

in accordance with FAA Order 1050.1E and DOT Order 5610.1C and the January 1997 CEQ guidance.

The development of the Proposed Action will not cause adverse impacts to the following resource categories: air quality, coastal barriers, coastal zone management program, compatible land use, construction impacts, DOT Section 4(f) resources, farmlands, fish, wildlife and plants, floodplains, hazardous materials, historic, architectural, archeological, and cultural resources, light emissions and visual effects, natural resources and energy supply, socioeconomic, environmental justice and children's health and safety risks, solid waste, water quality, wetlands, and wild and scenic rivers.

The cumulative impact of the Proposed Action, when added to the other past, present and reasonable foreseeable future actions described in Section IV, is collectively insignificant. The Proposed Action will continue to have the same effects on the environment similar to those that already exist.

When considered together with other Airport Authority projects recently completed, underway and proposed as reasonably foreseeable, the Proposed Action is consistent with the long-range planning goals for the Airport Authority. The Proposed Action will not have a significant impact on local or regional planning. As a whole, the Proposed Action and other past, present, and future Airport Authority projects will enable the Airport to better serve its customers, passengers, and tenants, continue to serve as a major economic engine for the region, and provide positive environmental and social benefits to its neighbors.

IV. Stakeholder and Public Coordination

Due to the nature of the Proposed Action and its potential for discernible (through temporary) off-airport noise impacts the Airport Authority has been proactive in coordinating with the affected public entities by notifying them in advance of the anticipated temporary impacts. The Airport Authority has also coordinated with the users of the airport affected by the Proposed Action to minimize operational and capacity impacts. The proposed rehabilitation of Runway 3R-21L has already had, and will continue to include, extensive coordination with the airport user groups to ensure that each tenant has adequate lead-time to implement any required temporary changes to their operation.

The surrounding communities that may experience temporary impacts have been and will continue to be notified of the Proposed Action's need, schedule, and anticipated temporary impacts. The Airport Authority has already briefed the surrounding communities on the Proposed Action and will continue to coordinate with the surrounding communities in an active and ongoing manner. The Airport Authority is in the process of updating their FAR Part 150 Noise Study and will continue to use that process to solicit and consider inputs from all communities regarding the noise environment surrounding the Airport. All local communities are represented in this

study, as they are members of the study advisory committee. The Airport Authority will use the Part 150 Study forum to continue to keep the surrounding communities informed on temporary changes in flight activity resulting from the Proposed Action. The Airport Authority also has a noise complaint hotline, which will be utilized to communicate with the public regarding any temporary changes in the volume of aircraft using runways other than Runway 3R-21L during the Proposed Action.

In addition to coordinating with the local community leaders through the Part 150 Study, public coordination efforts were also aimed at citizens themselves. On February 9, 2007, the Airport Authority placed copies of this Environmental Assessment at various locations in the community in an effort to inform and gather comments from the general public regarding the Proposed Action. Those locations were as follows:

- Wayne County Airport Authority
  Administrative Offices
  L.C. Smith Terminal-Mezzanine
  Detroit, MI 48242

- Federal Aviation Administration
  Detroit Airports District Office
  11677 South Wayne Road
  Romulus, MI 48174

- Taylor Public Library
  12303 Pardee Road
  Taylor, MI 48180

- Wayne County Airport Authority
  Noise House
  32629 Pennsylvania Road
  Romulus, MI 48174

- Romulus Public Library
  11121 Wayne Road
  Romulus, MI 48174

- DTW Website (www.metroairport.com)

The public was provided the opportunity to view the Environmental Assessment at these locations and submit comments from February 11, 2007 to March 11, 2007. Notifications to the public regarding the review locations for the Environmental Assessment were placed in the classified sections of the Detroit Free Press and the Detroit News newspapers on February 10, 2007. Instructions for submitting comments regarding the Proposed Project were included in the advertisements.

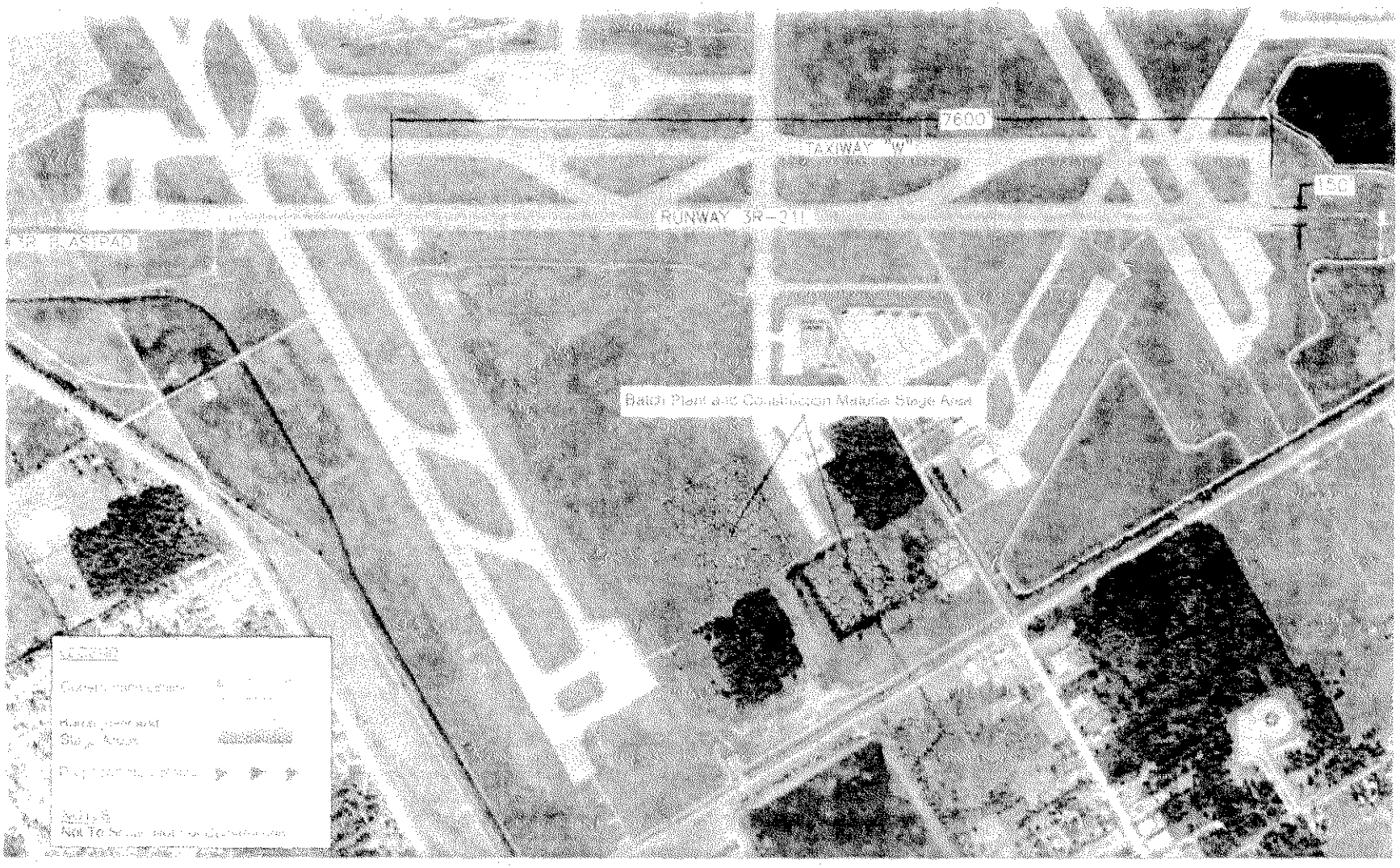
On March 1, 2007, the Airport Authority held a Public Information Session to notify and brief the public about the Project. The information session informed the public on the project's purpose/need, scope, schedule, and anticipated temporary changes to the operations at the Airport. Notifications to the public regarding the date and time of the Public Information Session were placed in the classified sections of the Detroit Free Press and the Detroit News newspapers on February 22, 2007 and February 24, 2007 and in the News Herald newspaper on February 25, 2007. A copy of these advertisements are included in Appendix B - Newspaper Advertisements. No comments were received either during the 30-day comment period or at the public information session.

Additionally, the WCAA communicated with local news agencies to inform them of the Project as a way to further disseminate information. As a result, articles describing the Project were written in USA Today (March 7, 2007), The Detroit Free Press (March 7, 2007) and the News-Herald (March 7, 2007). A copy of each article is located in Appendix C - Newspaper Articles.

Through these events and discussions about the Proposed Action with the FAA, other state and local agencies, and the surrounding communities, the WCAA has not been made aware of any public controversy or concern. The Airport Authority has been briefing local community officials through the Part 150 Study and engaging local press outlets to disseminate information about the Proposed Action. The Airport Authority is committed to active and ongoing coordination with the FAA, other state and local agencies, and the surrounding communities regarding the Proposed Action through its normal outreach efforts and the ongoing FAR Part 150 Update. Given the temporary nature of the impacts and the lack of a viable alternative to the project, the Airport Authority believes this is a prudent approach to stakeholder and public involvement and is consistent with the direction provided in the guiding documentation.

It should be noted that two other environmental studies are ongoing at the airport. The first is to support a FAA program that would improve airport capacity in poor weather. This will be accomplished by the installation of an offset instrument landing systems (ILS) for Runways 22R and 4L. The project will also install 32 precision runway monitors and Airport Surveillance Detection Equipment. New Air Traffic procedures will also be developed for the use of this equipment. A separate environmental document was prepared for this project.

The second environmental study is anticipated to be conducted in the future regarding the use of additional headings 055 and 060 for Runway 3R departures. This is a separate activity and is not associated with the Proposed Action. This document does not attempt to identify or address the potential environmental issues associated with this test or the development of the offset ILS approach.



Detroit Metropolitan
Wayne County Airport

Project Limits, Haul Routes & Staging Areas

NOT TO SCALE

Exhibit 1

000051

Figure 1 Future 2007 Proposed Action DNL
Noise Exposure Contours

Noise Contour Legend

Land Use Legend

DETROIT

000052

APPENDIX A

Wetland Evaluation

ECT
Environmental Consulting & Technology, Inc.
(Formerly Hon & Associates, Inc.)

April 11, 2006

Mr. Bryan Wagoner, P.E.
Environmental Administrator
The Wayne County Airport Authority
L.C. Smith Terminal- Mezzanine
Detroit, Michigan 48242

Re: Wetland Delineation

Dear Mr. Wagoner:

Environmental Consulting & Technology, Inc. (ECT) performed a wetland delineation on April 3, 2006 to determine the presence or absence of wetlands in two (2) project areas identified as the taxiway and the concrete storage area on the east side of the airport property. The wetland assessment was conducted at a time of the year that is considered outside of the growing season, but the ground was thawed and there was no snow cover on the ground. Plant remains in the investigated areas allowed us to determine the dominant plant species in the study area.

The purpose of the site visit to the location of the proposed taxiway was to verify a wetland determination performed in 1988 and referenced in a MDEQ permit. As part of this investigation, the following resources were used:

Barnes, B. V., and W. H. Wagner. 1981. *Michigan Trees: A guide to the trees of Michigan and the Great Lakes Region.* University of Michigan Press, Ann Arbor, MI.

Environmental Laboratory. 1987. *Corps of Engineers Wetlands Delineation Manual - Technical Report Y-87-1.* U.S. Army Engineers Waterways Experiment Station, Vicksburg, MS.

Feenstra, J.E. 1982. *Soil Survey of Oakland County.* United States Department of Agriculture, Soil Conservation Service, Washington, DC.

Herman, K. D., L. A. Masters, M. R. Penskar, A. A. Reznicek, G. S. Wilhelm, W. W. Brodovich, and K. P. Gardiner. 2001. *Floristic Quality Assessment with Wetland Categories and Examples of Computer Applications for the State of Michigan – Revised, 2nd Edition.* Michigan Department of Natural Resources, Wildlife, Natural Heritage Program. Lansing, MI. 19 pp. + Appendices.

Michigan Department of Environmental Quality. 2001. *MDEQ Wetland Identification Manual: A Technical Manual for Identifying Wetlands in Michigan.* MDEQ Land and Water Management Division, Lansing, MI. 65 pp. + Appendices.

[illegible]
FAX [illegible]

National Technical Committee for Hydric Soils. 1993. *Hydric Soils of the State of Michigan*. Fish and Wildlife Service, United States Department of Interior, Washington, DC.

Natural Resources and Environmental Protection Act 451 of 1994, *Part 301 Lakes and Streams* (as amended)

Natural Resources and Environmental Protection Act 451 of 1994, *Part 303 Wetlands Protection* (as amended).

Newcomb, L. 1977. *Newcomb's Wildflower Guide*. Little, Brown and Company, Inc., New York.

Penskar, M. R., A. A. Reznicek, W. W. Brodovich, G. S. Wilhelm, L. A. Masters, K. D. Herman, and K. P. Gardiner. 2001. Appendix C – Michigan Plants Database, *in* Herman, K. D., L. A. Masters, M. R. Penskar, A. A. Reznicek, G. S. Wilhelm, W. W. Brodovich, and K. P. Gardiner. 2001. *Floristic Quality Assessment with Wetland Categories and Examples of Computer Applications for the State of Michigan– Revised, 2nd Edition*. Michigan Department of Natural Resources, Wildlife Division, Natural Heritage Program, Lansing, MI. 19 pp. + Appendices.

Reed, P. B. 1988. *National List of Plant Species that occur in wetlands: North Central (Region 3)*. Fish and Wildlife Service Biological Report 88(26.3), U.S. Department of Interior, Washington, DC.

United States Department of Agriculture, Natural Resources Conservation Service. 1998. *Field Indicators of Hydric Soils in the United States, Version 4.0*. G. W. Hurt, Whited, P.M. and Pringle, R. F. (eds.), USDA, NRCS, Ft. Worth TX.

The methodology used to identify wetlands was typical of Michigan Department of Environmental Quality (MDEQ) and the Corps of Engineers wetland determinations. An evaluation was conducted using plant species, soil characteristics, and hydrology.

Findings

ECT found that the area that is proposed for the extended taxiway lacks evidence of wetlands and that the extent of wetlands is similar to the boundaries depicted on the MDEQ permit. The dominant vegetation consisted of upland turf grasses (fescue and Kentucky bluegrass) and upland weeds, most notably wild carrot (*Daucus carota*). ECT did not observe any wetland plants in the vicinity of the taxiway. There was no standing water in the area we observed. Soil borings to a depth of 36 inches did not reveal evidence of soil saturation. Soils in the area were badly disturbed from previous construction activities associated with construction of the runway and lacked any evidence of hydric conditions.

The investigation of the concrete storage areas indicated that some of the proposed areas had wetlands and some of the areas were predominantly upland areas.

Area 1. This area is located adjacent to a closed construction site just west of Middlebelt Road. At the time of the site visit, the area was flooded with 6-12 inches of water and appeared to be dominated by a combination of cattails and three square rush. The area is connected to a forested wetland to the west and is connected to the surface drainage system of the airport. Soils investigation around the perimeter of the site revealed that hydric soils were present. The presence of wetland vegetation, standing water and hydric soil indicates that the land in Area 1 is predominantly wetland.

Area 2 and Area 3. These areas are immediately south of Area 1 and consist of open fields surrounded by hedgerows of medium sized trees and shrubs. The vegetation in the open fields consists of upland grasses (fescue and bluegrass) upland forbs such as wild carrot (*Daucus carota*). Wetland vegetation was limited to a shallow (2-3 feet) drainage ditch that surrounded the open field. Vegetation in the drainage ditch was silver maple, cottonwood and silky dogwood. There was standing water in the drainage ditch, but there was no evidence of standing water in the fields. Soil borings in the fields showed that the soil was a silty clay, but soil saturation was not observed in the soil borings conducted in the upland portion of the site.

The wetland assessment was conducted at a time prior to the onset of plant growth. As a result, determination of the dominant plant species was done by examining dead plant parts in the field. While we believe this method is adequate to identify the predominant plant species in this case, ECT should prepare a complete plant list during the growing season to confirm our preliminary findings.

The regulation of wetlands in Michigan is under the jurisdiction of the U.S. Environmental Protection Agency, the U.S. Army Corps of Engineers, and the MDEQ. These agencies make independent determinations as to what is and what is not a wetland. The determination of a wetland boundary by these agencies can vary depending upon many factors including, but not limited to, the agency representative conducting the determination, wetland policy and the time of year the site was examined. In addition, the wetland boundaries and extent on the site can change from time to time depending upon numerous factors including, but not limited to, changes in vegetation, drainage, weather patterns and activities on adjacent parcels that may alter the pattern of the wetland on the subject property. The wetland determination on the subject parcel is based on the condition of the site at the time of our investigation, our past experiences with regulatory agencies and current policy regarding the procedures used to delineate wetlands.

If you have any questions, please feel free to contact me.

Sincerely,

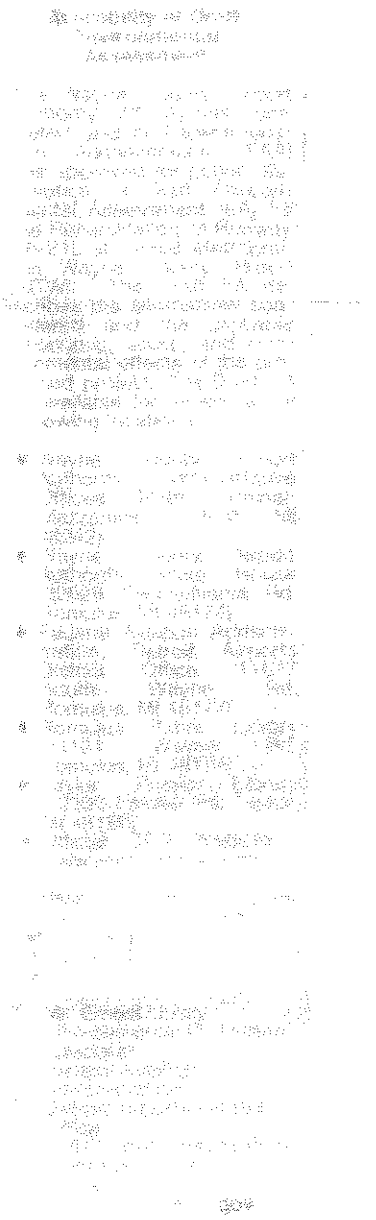
ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Donald L. Fitton, Ph.D.
Vice President

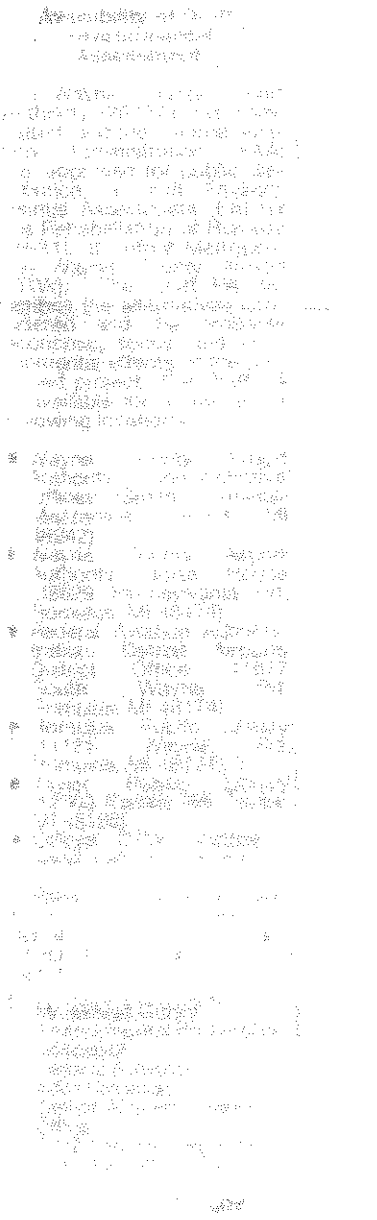
APPENDIX B

Newspaper Advertisements

Saturday, February 10, 2007
The Detroit News



Saturday, February 10, 2007
The Detroit Free Press



Thursday, February 22, 2007
The Detroit News

The Wayne County Airport Authority will hold a Public Information Session on the proposed Rehabilitation of Runway 3R-21L at Detroit Metropolitan Wayne County Airport (DTW) on March 1, 2007 from 5-7 p.m. at the Metropolitan Hotel, located at 31560 Wick Rd. in Romulus. The purpose of this session is to provide the public with information about the proposed project and answer questions about the anticipated environmental, economic, and social effects.

Reasonable auxiliary aids and services, such as signers for the hearing impaired will be provided upon three (3) days notice to Barbara Hogan of the Wayne County Airport Authority at (734) 942-3773 or by e-mail to barbara.hogan@wcaa.us.

Thursday, February 22, 2007
The Detroit Free Press

Notice of Public Information Session

The Wayne County Airport Authority will hold a Public Information Session on the proposed Rehabilitation of Runway 3R-21L at Detroit Metropolitan Wayne County Airport (DTW) on March 1, 2007 from 5-7 p.m. at the Metropolitan Hotel, located at 31560 Wick Rd. in Romulus. The purpose of this session is to provide the public with information about the proposed project and answer questions about the anticipated environmental, economic, and social effects.

Reasonable auxiliary aids and services, such as signers for the hearing impaired will be provided upon three (3) days notice to Barbara Hogan of the Wayne County Airport Authority at (734) 942-3773 or by e-mail to barbara.hogan@wcaa.us.

Saturday, February 24, 2007
The Detroit News

Notice of Public Information Session

The Wayne County Airport Authority will hold a Public Information Session on the proposed Rehabilitation of Runway 3R-21L at Detroit Metropolitan Wayne County Airport (DTW) on March 1, 2007 from 5-7 p.m. at the Metropolitan Hotel, located at 31560 Wick Rd. in Romulus. The purpose of this session is to provide the public with information about the proposed project and answer questions about the anticipated environmental, economic, and social effects.

Reasonable auxiliary aids and services, such as signers for the hearing impaired will be provided upon three (3) days notice to Barbara Hogan of the Wayne County Airport Authority at (734) 942-3773 or by e-mail to barbara.hogan@wcaa.us.

Saturday, February 24, 2007
The Detroit Free Press

Notice of Public Information Session

The Wayne County Airport Authority will hold a Public Information Session on the proposed Rehabilitation of Runway 3R-21L at Detroit Metropolitan Wayne County Airport (DTW) on March 1, 2007 from 5-7 p.m. at the Metropolitan Hotel, located at 31560 Wick Rd. in Romulus. The purpose of this session is to provide the public with information about the proposed project and answer questions about the anticipated environmental, economic, and social effects.

Reasonable auxiliary aids and services, such as signers for the hearing impaired will be provided upon three (3) days notice to Barbara Hogan of the Wayne County Airport Authority at (734) 942-3773 or by e-mail to barbara.hogan@wcaa.us.

Sunday, February 25, 2007
Heritage Newspapers/The News Herald

Notice of Public Information Session

The Wayne County Airport Authority will hold a Public Information Session on the proposed Rehabilitation of Runway 3R-21L at Detroit Metropolitan Wayne County Airport (DTW) on March 1, 2007 from 5-7 p.m. at the Metropolitan Hotel, located at 31500 Wick Rd. in Romulus. The purpose of this session is to provide the public with information about the proposed project and answer questions about the anticipated environmental, economic, and social effects.

Reasonable auxiliary aids and services, such as signers for the hearing impaired will be provided upon three (3) days notice to Barbara Hogan of the Wayne County Airport Authority at (734) 942-3773 or by e-mail to barbara.hogan@wcaa.us.

APPENDIX C

Newspaper Articles

Wednesday, March 7, 2007
Heritage Newspapers/The News Herald

Runway repaving project is proposed

BY FRANCESCA CHAMBERS
fchambers@thenewsherald.com

ROMULUS – The Wayne County Airport Authority has proposed a $91 million rehabilitation project to revamp one of Detroit Metropolitan Wayne County Airport's runways.

That price tag includes the engineering, design, construction, testing and reopening of the runway, that is now distressed.

Financing for the 10,000-foot project is expected to come from federal aviation administration grants and proceeds from the sale of airport revenue bonds now backed by Delta Air Lines Inc. and Northwest Airlines Corp.

The runway, commonly known as 3R-21L, and the Airport Traffic Control Tower, the tallest of which rises from more than 300 feet, would provide runway for the project.

The authority proposed an environmental impact study during Thursday, as part of the application process with the FAA.

The FAA will decide the project's feasibility and fundability and should provide feedback to the authority before May, Conway said.

The authority anticipates that the FAA will approve the project, and construction could begin in May.

The project entails removing two of the three layers of concrete on the southern section of the 10,000-foot runway. Runway 3 of the three layers of concrete will be left in place.

Aviation officials said the runway would be salvaged, because it was in good condition.

The extensive project would include installing new runway lighting system, part of the runway and taxiways to the runway and crossovers.

The southern section of the runway was designed last summer for the major rehabilitation, which is included in the proposal, Conway said.

The runway, which is primarily used for landing flights, would be out of service during the construction.

Traffic that normally lands on that runway would be routed to three other parallel runways, causing some jet noise in the north and east sides of the airport. Residents in the eastern Romulus and Belleville would notice more arrival flights over their neighborhoods.

Meanwhile, the planes would shift back to regular flight patterns.

The project is the latest in numerous upgrades to the airport will create a variety of jobs, like the other runways, Conway said.

During the hearing, a Romulus Department of Public Works employee inquired about the material to create the concrete would come from, according to Conway.

The authority pulled a permit from Romulus to dig five test wells on the airport's property, Conway said, but it wouldn't open any because of time.

Another issue is that construction crews "could make it a little slow access," Conway said. "It's a busy airport."

The runway, constructed in 1978, is in above-ground condition to open, Conway said, adding that because Runway 3R-21L is longer compared to runways, but is similar to the same pavement, such as pavement, Conway said.

In the past year alone the runway was shut down for 20 days due to repairs for pavement repair work.

"We have to make these arrangements, it does cost a lot, but the FAA makes us do it," Conway said. "It's a busy airport. We might not shut it down entirely."

Conway said the authority has been planning the project for years and recently signed a 10-year lease agreement with the FAA on how to repair runways, according to the contracts.

Comments or questions about the proposed project can be addressed to the FAA until Wednesday by the 8th.

Any press information about the project can be obtained at 1-800-351-8326.

Wednesday, March 7, 2007
The USA Today

Airport Check-in: Oakland addresses congestion, Detroit runway closing

By Roger Yu, USA TODAY

OAKLAND

Improved curbsides offer greater access

Oakland International last week opened a new lane and curbside area outside the terminal for taxis and shuttles used for the metro rail and airport parking. It also added new canopies and benches and improved lighting.

The airport plans to continue upgrading the curbsides outside of the terminal. Airport spokeswoman Rosemary Barnes says the changes should help reduce congestion. The work is expected to continue into 2008.

DETROIT

FIND MORE STORIES IN: Airport | Oakland | Airbus | LAX | A380 | John F. Kennedy Airport

Runway to be closed for renovation

Detroit Metro is closing one of its six runways in May for a $50 million renovation. The runway mostly handles arrivals.

Until it reopens in November, travelers may face short delays since the airport plans to use only four of the five open runways to compensate for the closure. The fifth runway intersects the runway to be closed, effectively shortening it while the work continues.

Only smaller regional jets, which need less runway to land and take off, will use that during the work.

Airport spokesman Michael Conway says the airport has been working with airlines and the Federal Aviation Administration to minimize delays.

Wednesday, March 7, 2007
The Detroit Free Press

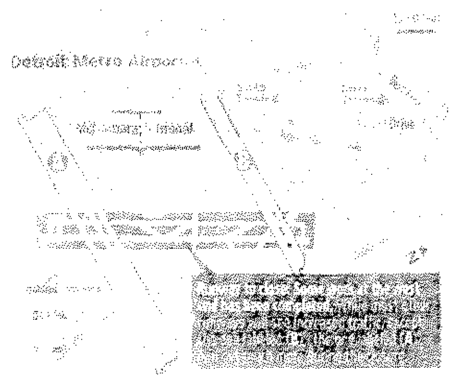
Metro runway to close for construction

[illegible]-month project is to begin in May

[illegible]

See METRO, 6B

Detroit Metro Airport



METRO | Runway to close for construction

From Page 1B

[illegible]

ATTACHMENT 6: FINDING OF NO SIGNIFICANT IMPACT/RECORD OF DECISION, RUNWAY 3R-21L REHABILITATION PROJECT, MARCH 14, 2007

U.S DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
GREAT LAKES REGION
DETROIT AIRPORTS DISTRICT OFFICE
DETROIT, MICHIGAN

FINDING OF NO SIGNIFICANT IMPACT/
RECORD OF DECISION

For

Runway 3R-21L Rehabilitation Project

at

Detroit Metropolitan Wayne County Airport (DTW)
Detroit, Michigan

March 2007

Introduction

This Finding of No Significant Impact/Record of Decision (FONSI/ROD) has been prepared for the proposed Runway 3R-21L Rehabilitation project at Detroit Metropolitan Wayne County Airport (DTW), owned and operated by the Wayne County Airport Authority (WCAA), Detroit, Michigan. The attached Final Environmental Assessment (EA), dated March 2007, has been prepared in accordance with the guidelines and requirements set forth by the Council on Environmental Quality (CEQ) and the Federal Aviation Administration (FAA) to implement the environmental review and disclosure provisions of the National Environmental Policy Act of 1969.

This Finding of No Significant Impact/Record of Decision (FONSI/ROD) discloses impacts expected to occur to the environment that would result from a decision to implement the Proposed Action, and provide the FAA's basis for its decision.

I. Proposed Action

The proposed project consists of rehabilitation of Runway 3R-21L (Proposed Action or Project). The Project consists of the demolition, removal and full-depth replacement of the pavement section for the northern 7,600 feet of the 150 feet wide Runway 3R-21L, the blast pad on each runway end and the portion of all adjacent stub taxiways within the runway safety area along the northern-most 7,600 feet located between the runway and parallel Taxiway W. The blast pads will be slightly increased in size. See Section 1 and Exhibit 1 of the EA.

The Project is planned to take 175 days and is proposed to start in the spring of 2007. During the 175-day construction period operations typically assigned to Runway 3R-21L would be reassigned to one of the other parallel runways typically used in the primary operating configuration (3L-21R, 4R-22L, or 4L-22R). During peak periods it is anticipated that Runway 9R-27L, one of the crosswind runways, would also be used for arrivals and departures as weather conditions and wind direction permit, in order to accommodate peak demand. The airport sponsor conducted an Environmental Assessment to examine off airport environmental impacts.

II. Purpose and Need for the Proposed Action

Currently DTW is the 11th busiest airport in the U.S. handling over 521,000 aircraft operations in 2005. Runway 3R-21L is one of four primary runways needed to efficiently accommodate the current and future aircraft arrival and departure activity at the Airport. Without the Proposed Action, Runway 3R-21L would eventually be unable to safely accommodate aircraft operations and would have to be closed.

In the last ten years, Runway 3R-21L has required increasing repair and maintenance in the form of extensive patching. The need for the Proposed Action is to address deteriorating condition of

the pavement and the patching which result in the development of Foreign Object Debris (FOD). Foreign Object Debris may result in a significant safety hazard. The deteriorating condition of Runway 3R-21L has become the focus of increasing concern by the Airport Authority, the FAA, and the Airline Pilots Association (ALPA). In 2003, the Airport Authority initiated a Pavement Management Study (PMS) to identify and prioritize areas of the airfield that are in need of repair and/or replacement. Following completion of the PMS in 2004, one of the highest priorities of the PMS was the rehabilitation of Runway 3R-21L. In addition to the Airport Authority, the FAA, one of the airport's major airlines and the Air Line Pilots Association (ALPA) have also acknowledged their respective concerns about the pavement condition. Based on the results of the PMS and the importance of the runway to airfield operations, the Airport Authority determined that rehabilitating Runway 3R-21L is an immediate priority.

III. Alternatives Considered

Do Nothing – Permanent Closure

This alternative would consist of continued operations using the existing airport facilities. When the pavement reached failure condition the runway would be closed. Permanently closing Runway 3R-21L would dramatically reduce airfield capacity, increase utilization of the three remaining parallel runways and result in a significant increase in aircraft delays at the Airport as well as consequential delays at other airports that rely on the Airport's role as a connecting hub airport. Based on previous studies the permanent loss of this runway would increase delays within the entire National Airspace System (NAS). Permanent closure of Runway 3R-21L would also necessitate permanent changes to the flight track usage that would result in significant changes in noise over noise sensitive areas. This alternative was not chosen as the Proposed Action because it does not meet the airport needs. However, as required by NEPA, this alternative is carried forward for evaluation of environmental consequences.

Partial Asphalt Overlay

A simple 6-week long partial asphalt overlay was considered, but was determined to be ineffective. The condition of the 17-inch concrete section is deteriorating so quickly that the overlay would not survive more than a few years at which point a minimum six month long full-depth replacement would still be required. This alternative represented significant additional costs without any operational or environmental benefits.

Rubblization

Another alternative approach that was considered for the rehabilitation is a technique referred to as rubblization. This construction technique was evaluated in an on-site test completed in early 2006, but was rejected because it would effectively raise the elevation (height) of Runway 3R-21L, which would directly impact two crossing runways, all of the taxiway connectors, and the

landscape adjacent to the runway shoulders. The added scope of work to address these impacts would have the similar environmental consequences as the proposed action. In addition, it would have resulted in significant operational impacts to the airfield including loss of at least one crosswind runway for the majority of the construction duration.

Proposed Action

The Proposed Action is described in Section II of this document.

Summary

Deferral of the Proposed Action is not practicable as it would likely result in further deterioration of the pavement, patches and aggregate base, leading to more frequent closures for routine and emergency maintenance, and a potentially longer rehabilitation effort. Additionally, deferral of the Proposed Action would not eliminate or even reduce the environmental impacts associated with the Project and could ultimately result in an increase of the environmental impacts expected when the Proposed Action is eventually undertaken. Increased environmental impacts could result from a potentially longer closure or a closure that extended over more than one construction season. Further, the Airport Authority has determined that continued patching of the runway is not a viable alternative to the Proposed Action because the failure rate of the pavement and patching would likely result in significant FOD, potentially creating an unacceptable risk of aircraft damage.

IV. Environmental Consequences

Environmental impact categories identified in FAA Order 1050.1E, "*Environmental Impacts: Policies and Procedures*", and FAA Order 5050.4B, "*National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*" were evaluated through preparation of an environmental assessment (EA).

Given the location and nature of the proposed project the following environmental resource and impact categories do not occur in the study area and would not be impacted by either the proposed action or the no–action alternative:

- Coastal Resources,
- Farmlands,
- Floodplains,
- Secondary (Induced) Impacts,
- Wild and Scenic rivers.

The following environmental categories were evaluated in the EA (Section III) and would result in no effects from the Proposed Action:

- Air Quality (de minimis),[1]
- Section 4(f) resources,
- Fish, Wildlife and Plants (Threatened and Endangered Species),
- Hazardous Materials,
- Historical, Architectural, Archeological, and Culture Resources,
- Light Emissions and Visual Impacts,
- Natural Resources and Energy Supply,
- Environmental Justice, Children's Environmental Health, and Safety Risks,
- Water Quality,
- Wetlands.

The Proposed Action could impact two environmental categories. These categories include:

1) Noise/Compatible Land Use,
2) General Construction Impacts.

Potential impacts to each of these categories are described as follows.

Noise Compatible Land Use

Aircraft-related noise exposure has been disclosed using noise contours prepared with the Federal Aviation Administration's (FAA's) Integrated Noise Model (INM). These contours are presented using the Day-Night Average Sound Level (DNL) noise contour metric. During the Proposed Action, Runway 3R-21L would be closed and Runway 9R-27L and the parallel runways would be used for those flights during peak hours and the shoulder periods leading up to and following the peak hours.

Noise increases would result from different runways being used while Runway 3R-21L is closed for 175 days for rehabilitation. Approximately 110 homes would be newly within the 65 DNL contour with implementation the Proposed Action when compared to the No Action Alternative. Of the 110 homes newly within the 65 DNL contour, 55 of those would not be subjected to a 1.5 DNL increase. Of the remaining 45 homes that would be subjected to noise increases of 1.5 DNL or greater:

> 30 homes have already been sound attenuated to 70 DNL or greater sound levels, and are therefore considered compatible.
>
> 10 homes have been offered sound attenuation but either; 1) the homeowner did not wish to participate in the voluntary program or 2) the homeowner could not, or would not, make the home compliant with the local building code, which is a prerequisite to participate in the sound attenuation program.

[1] The proposed action will not change aircraft operations. The EA conducted a detailed air quality emissions inventory (see section III) and determined that the proposed action is de minimis.

5 homes have not previously been offered sound attenuation.

No churches or schools are located in the future 65 DNL and greater contours for either the No Action or the Proposed Action.

General Construction Impacts

Construction activity associated with project would include the demolition and replacement of the runway pavement, grading, and removing vegetation along the runway.

During construction, fugitive dust would be generated through construction activities. As with any construction project, noise levels would likely increase at receivers that are near construction activities. Temporary impacts to water quality as a result of erosion and sedimentation could occur.

V. Environmental Mitigation

Noise/Compatible Land Use

During the summer of 2007 additional homes will be temporary subjected to an increase noise when compared to normal flight patterns at the airport. After the rehabilitation is completed historical use of Runway 3R-21L will be restored. Runway 3R-21L will be reconstructed to its original length, width and strength and will not result in increases in operations or changes in types of aircraft using the runway. The flight tracks and percentage of use will also return to their prior usage.

The project-related impacts, (noise in excess of 1.5 DNL), would be temporary and will be reversed at the completion of the construction. Despite the conditions being temporary, the Airport Authority has evaluated all possible means to reduce or mitigate the effects of the Proposed Action.

The Airport Authority and FAA have incorporated all practicable mitigation into the Proposed Action. Specifically, the Airport Authority has coordinated with the FAA Airport Traffic Control Tower staff to consider alternative runway use programs to avoid or reduce changes that would result in the noise effects of a 1.5 DNL increase without compromising safety and national airspace system efficiency. There was no acceptable alternative to the proposed action. The Proposed Project would result in closure of Runway 3R-21L during the entire 175 days. Aircraft operations normally using that runway would be directed by FAA Airport Traffic Control Tower staff to one of the other available runways for takeoff and landings. Currently the dominant runway use patterns result in the parallel runways being used for arrivals and departures. The crosswind runways (Runway 9R-27L and Runway 9L-27R) are only used when wind and

weather require their use. currently Runway 9R-27L is primarily used about two percent of the time annually when weather and wind dictates.

Consideration was also given to noise insulation of homes that would be included in the 65 DNL and greater contour during the 175-day construction period. As described above, of the approximately 45 homes that would be subjected to a temporary noise increase of 1.5 DNL or greater, all but 5 homes to the east of the airport have already been offered sound attenuation. The Airport is cognizant of the noise impacts associated with the construction and the potential effect, however, does not deem sound insulation as being appropriate mitigation for temporary impacts of such a limited duration.

As no prudent airport operational measures were identified for the 175 days, consideration was given to land use compatibility actions that could be taken to mitigate the adverse noise effects. As a result of the 1993 Noise Compatibility Plan, the Airport Authority has offered sound insulation to the majority of homes within the existing 65 DNL contour, including most of those that would be affected by the Proposed Project. Homes subject to the highest noise levels were acquired and residents relocated. This effort has provided great benefit to the communities and residences most impacted by aircraft noise by providing the means and opportunity to relocate to areas that are not impacted by noise. The sound insulation program has allowed homeowners to receive indoor noise reduction. It also has allowed surrounding communities to implement compatible and appropriate land uses adjacent to airport property that were once incompatible with airport generated noise. Additionally, an update to the Part 150 program is currently underway, which may provide additional noise reduction opportunities to residence around the Airport. Nonetheless, these ongoing efforts under Part 150 are not directly related to this environmental review and future mitigation measures beyond those described above cannot be guaranteed or approved at this time.

The Airport Authority and FAA have considered all possible means to minimize the temporary noise effects. As this discussion indicates, there are no prudent and feasible actions available to further minimize the anticipated effects of the Proposed Action. At the end of the project the noise contours will return to their previous state.

Temporary changes to runway use have occurred consistently over the years during the normal course of airport maintenance and operational requirements. However, they have not involved a closure of this duration. Because of the amount of time the Proposed Action would take to complete (175 days), the Airport Authority has initiated a public notification and outreach effort to ensure all affected communities and citizens are made aware of the maintenance project and the temporary changes in noise exposure that will result. The Airport Authority will conduct additional community outreach meetings to ensure that the public and potentially affected residents are aware of the project. This will include updates on the progress made on the reconstruction of Runway 3R-21L as it occurs.

General Construction Impacts

Fugitive dust, noise, vibrations, erosion and sedimentation impacts from the Proposed Action could occur but they would be localized and temporary.

During construction, vibration would not be perceptible off the airport property. Therefore, this would not result in vibration impacts to any buildings or personal property.

The provisions of FAA Advisory Circular 150/5370-10, "*Standards for Specifying Construction of Airports*", FAA Advisory Circular 150/5230-5B, "*Airport Drainage*", and State of Michigan regulations will be incorporated into the construction contract as required to prevent air and water pollution. Adequate controls will be used to minimize any adverse effects generated by grading operations. Contract specifications will require control of dust from all construction operations. Care will be exercised to seed or pave areas in a timely manner after final grading. Mulching of all seeded areas will be required to ensure good starting and growth of grass seed. Air quality impacts, such as fugitive dust and exhaust from construction equipment, will be minimized by seeding disturbed areas, covering haul trucks, and wetting down the construction areas.

Sediment and erosion control measures will be used to minimize impacts to surface water and/or wetland areas. Construction would comply with FAA specifications, and State of Michigan regulations will be followed as required to prevent air and water pollution. If erosion and sedimentation impacts occur, corrective action will be taken, and surface water quality would not be substantially degraded.

Based upon the analysis contained in the EA, it was determined that the project would have no effect on Air Quality and that the construction impacts would be de minimis.

VI. PUBLIC AND AGENCY INVOLVEMENT

A Notice of Availability (NOA) of the Draft EA for public review was published on February 10, 2007 in local newspapers. The notice stated that the draft EA would be available for public review and the NOA described the Proposed Action and included the locations where review copies of the Draft EA could be found. The Airport Authority has been highly proactive in advising the affected communities about the Proposed Action and its temporary impacts. The Airport Authority has already briefed the surrounding communities on the Proposed Action and will continue to coordinate with the surrounding communities in an active and ongoing manner.

The Airport Authority is in the process of updating their FAR Part 150 Noise Study and will continue to use that process to solicit and consider inputs from all communities regarding the noise environment surrounding the Airport. All local communities are represented in this study, as members of the Technical Advisory Committee. The Airport Authority will use the Part 150 Study forum to keep the surrounding communities informed on temporary changes in air traffic procedures flight activity resulting from the Proposed Action. The Airport Authority also

maintains a noise complaint hotline, which will be used to communicate with the public regarding temporary changes in runways usage during the Proposed Action.

The draft Environmental Assessment has been circulated in the potentially affected communities and comments have been invited for a 30-day period. In addition, although there was no legal requirement to do so, the Airport Authority also conducted a public information session specifically regarding the Proposed Action. No comments have been received either during the 30-day comment period or at the public information session.

VII. FAA FINDINGS AND ORDERS

The following determinations are based upon analysis contained in the EA:

- Implementation of the Proposed Action would not cause an increase in net air emissions that would equal or exceed the applicable *de minimis* thresholds demonstrating that the Proposed Action would not require a General Conformity Determination. Consequently, it can be concluded that no adverse impact on air quality would be expected as a result of the Proposed Action. [Clean Air Act, Section 176(c)(1) Conformity Determination for the Proposed Project, [42 U.S.C. Section 7506 (c)]

As described in the EA and the FONSI/ROD, there was a detailed process that led to identification of a Proposed Action. Similarly, the FAA has conducted an independent review of the factual assumptions contained in the EA. Individuals from the FAA have devoted substantial attention to the EA in order to insure compliance with NEPA, and other environmental requirements. Accordingly, I find that the independent and objective evaluation called for by the Council on Environmental Quality has been provided. The FAA has given this proposal the independent and objective evaluation required by the Council on Environmental Quality. [40 CFR 1506.5]

I have carefully and thoroughly considered the facts contained in the attached EA. Based on that information, I find that the proposed Federal action is consistent with existing national environmental policies and objectives of Section 101(a) of the National Environmental Policy Act of 1969 (NEPA). I also find the proposed Federal action with the required mitigation referenced above will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to Section 102 (2)(C) of NEPA. As a result, FAA will not prepare an EIS for this action.

Therefore, under the authority delegated to me by the Administrator of the FAA, I find that the proposed airport improvement projects described and evaluated in the EA and addressed in this FONSI/ROD are reasonably supported and approved. I direct that action be taken to carry out the agency actions discussed in the following:

- Federal environmental approval so that the WCAA can establish eligibility to participate in funding through use of Federal Airport Improvement Program (AIP) funds.

- Federal environmental approval so that the WCAA can establish eligibility to participate in funding through use of Passenger Facility Charges (PFC) funds.

- FAA airspace review that the development proposed is appropriate from an airspace utilization and safety perspective based on aeronautical studies of persons and property on the ground conducted pursuant to the process under the standards and criteria of 14 CFR Parts 77 and 157 (49 U.S.C. Section 40103 and Section 40113, respectively).

- FAA determination that the proposed projects conform to FAA design criteria. The FAA will work with the sponsor to ensure that the Proposed Action conforms to FAA design criteria. Further, FAA approves protocols for maintaining coordination among sponsor offices, construction personnel, and appropriate FAA program offices, as required, to ensure safety during construction.

Finally, based upon the administrative review of this project, I certify, as prescribed by 49 U.S.C. 44502(b) that implementation of the Proposed Action is reasonably necessary for use in air commerce.

Having met all relevant requirements for environmental considerations and consultation, the Proposed Action is authorized to be taken at such time as other requirements have been met.

APPROVED: X DISAPPROVED: ____

Ernest P. Gubry
Acting Manager, Detroit Airports District Office
Federal Aviation Administration

Date: 5-14-2007

RIGHT OF APPEAL

This ROD presents the Federal Aviation Administration's final decision and approvals for the actions identified, including those taken under provisions of 49 U.S.C. Subtitle VII, Parts A and B. This decision constitutes a final order of the Administrator subject to review by the Courts of Appeals of the United States in accordance with the provisions of 49 U.S.C. Section 46110. Any party seeking to stay the implementation of this ROD must file an application with the FAA prior to seeking judicial relief, as provided in Rule 18(a), Federal Rules of Appellate Procedure.

ATTACHMENT 7: LETTER REQUESTING CATEGORICAL EXCLUSION, RUNWAY 9L-27R RECONSTRUCTION, DECEMBER 14, 2007

DETROIT METRO • WILLOW RUN
WAYNE COUNTY AIRPORT AUTHORITY

December 14, 2007

Mr. Ernest Gubry
FAA Detroit Airports District Office
11677 S. Wayne Road, Suite 107
Romulus, MI 48174

Re: Environmental Statement
Various Airfield Projects – Detroit Metro Airport

Dear Mr. Gubry:

The Wayne County Airport Authority ("Authority") is proposing a group of projects ("Proposed Action") under the airport capital improvement program. The Proposed Action will reconstruct approximately 600,000 square yards of existing airfield pavement on the aircraft Apron adjacent to Taxiway Kilo and near the North Terminal, Taxiways K, V, H, F, W, M, Z, crosswind Runway 9L/27R, and will construct new Taxiway G from Runway 9L/27R to Taxiway U. The purpose of the Proposed Action is to improve pavement condition, operational efficiency and safety at Detroit Metro Airport.

FAA participation, through funding approval of the ACIP grant program to complete the Proposed Action is anticipated. In order to receive federal funding, the Council on Environmental Quality requires federal agencies to comply with the provisions of National Environmental Protection Act of 1969 ("NEPA"), 40 C.F.R. parts 1500-1508, as amended. To achieve compliance, FAA Order 1050.1E provides FAA's policy and procedures to meet NEPA goals. Further, FAA Order 5050-4B provides additional procedures to integrate Order 1050.1E and NEPA.

Pursuant to Order 1050.1E, paragraph 303, the FAA allows Categorical Exclusion from detailed evaluation for proposed actions that do not significantly effect the human environment. The Proposed Action is categorized as a minor development under paragraph 310e, and qualifies for a Categorical Exclusion, baring extraordinary circumstances. Extraordinary circumstances exist when the proposed action (1) involves specific environmental circumstances, and (2) may have a significant effect, individually or cumulatively, on the human environment [40 CFR 1508.4]. Extraordinary circumstances, as provided in paragraphs 304a through 304k, were evaluated to determine environmental impacts due to the Proposed Action. The relevant significant impact section (Appendix A, FAA Order 1050.1E) for each 304 circumstance was reviewed and given consideration in preparation of this environmental statement. It was concluded that no extraordinary circumstances exist for the Proposed Action.

Evaluation of the Proposed Action determined that it will have no significant impacts to air quality. The Proposed Action will not impact the number of flights and therefore will not increase any airborne emissions from additional activity. During construction a temporary but insignificant increase in airborne emissions could occur from dust at the construction site and along haul routes and from construction equipment. These temporary impacts will be minimized by using dust control practices. In March of 2007, the Authority completed an Environmental Assessment for the Runway 3R-21L Rehabilitation Project that received a Finding of No Significant Impact/Record of Decision from the FAA. The result of the Air Quality analysis contained in that document concluded that there would be no significant emissions

DETROIT METROPOLITAN WAYNE COUNTY AIRPORT
L. C. Smith Terminal • Mezzanine • Detroit, Michigan 48242 ph 734 942 3550 fax 734 942 3793 www.metroairport.com

impact as a result of that project. The rehabilitation of Runway 9L-27R component of the Proposed Action is similar in purpose and need to the Runway 3R-21L Rehabilitation Project, will have a similar number of construction days, but is smaller in area and will likely require fewer pieces of construction equipment. The remaining taxiway components will be conducted intermittently over a period of at least four years and will not cause an increase in air emissions above the applicable de minimis thresholds as established under the Clean Air Act Therefore, it is concluded that there will be no significant emissions impact as a result of the Proposed Action.

Evaluation of the Proposed Action also determined that it will have no significant impacts to noise. The number of aircraft operations, the fleet mix, and the number of passengers using DTW facilities will not change as a result of the Proposed Action. No new air traffic procedures (i.e. new routes, navigational equipment or changes in aircraft altitude) will need to be implemented as a result of the Proposed Action. Currently, Runway 9L/27R is used less than two percent of the time and is not typically operated in conjunction with the primary arrival and departure runways. Rather, it is used exclusively in crosswind operations when the winds dictate its use along with the parallel Runway 9R-27L. During the Proposed Action, those flights that would typically use Runway 9L-27R will be forced to use Runway 9R-27L or be delayed or cancelled. Because Runway 9L-27R is already typically in use in the crosswind operating configuration, the number of additional flights able to be accommodated is extremely low. As such, it is anticipated that the Proposed Action will not result in any noise increase of 1.5 DNL within the 65 DNL contour.

In the past, the Authority has been proactive in coordinating with the surrounding communities and airport users regarding anticipated construction activity. Although we do not anticipate any significant environmental impacts as a result of the Proposed Action, the Authority will notify these stakeholders of the need and schedule of the Proposed Action through the FAR Part 150 Study or other standard outreach methods.

Based on the preceding information, the Authority does not anticipate any significant environmental impacts, either individually or cumulatively, to the human environment as a result of the Proposed Action. NEPA goals have been considered as required under FAA Order 1050.1E and Order 5050.4B. As such, the Authority is requesting that the Proposed Action be approved for a Categorical Exclusion as allowed under FAA Order 1050.1E.

If you have any questions or need additional information, do not hesitate to contact Wayne G. Sieloff at (734) 247-7371. Thank you for your help assistance in this matter.

I certify, to the best of my knowledge, that the information provided above is accurate and demonstrate that the proposed Project, in accordance with FAA Order 5050.4B, indicates that there is no need to prepare an environmental assessment.

Sponsor:

25

Lester W. Robinson — Date
Chief Executive Officer
Wayne County Airport Authority

R:\Planning\Environmental Reviews\Various DTW Airfield Projects\121407 DTW Airfield Projects Cat Ex Letter_.doc

ATTACHMENT 8: CATEGORICAL EXCLUSION, RUNWAY 9L-27R RECONSTRUCTION, FEBRUARY 8, 2008

Federal Aviation Administration

MEMORANDUM

Date: February 8, 2008

To: Wayne County Airport Authority

From: Ernest Gubry, Airports District Office

Prepared by: Ernest Gubry, EPS, (734) 229-2905

Subject: Categorical Exclusion for taxiway rehabilitations, Runway 9L/27R rehabilitation and construction of new Taxiway G for Detroit Metro Airports.

PROJECT DESCRIPTION: See Attached letter Dated December 14, 2007.

REFERENCE

[1] FAA Order 1050.1E "Environmental Impacts: Policies and Procedures"

[2] FAA Order 5050.4B "National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions"

[3] Prior environmental studies for DTW airports.

CATEGORICAL EXCLUSION DETERMINATION

Under NEPA, the Federal Aviation Administration (FAA) is required to take into account environmental considerations when authorizing or approving Federal actions. Based on the review of the actions described above, the undersigned has determined that the proposed actions are specifically categorically excluded. They fall within the specific items identified in FAA Order 1050.1E, Chapter 3, Advisory and Emergency Actions and Categorical Exclusions and are normally categorically excluded from the requirement for formal environmental assessment when extraordinary circumstances are not present:

- Reference Paragraph 310e.

Record of Environmental Review Approved by:

Signature: Ernt P Gubry Date: 2-11-08

Environmental Protection Specialist, XXX-ADO

Federal Aviation Administration

MEMORANDUM

Date: February 8, 2008

To: Environmental File for Detroit Metropolitan Airport

From: Ernest Gubry, Airports District Office

Prepared by: Ernest Gubry, EPS, (734) 229-2905

Subject: Information: Additional Environmental Analysis

REFERENCE

[1] FAA Order 1050.1E "Environmental Impacts: Policies and Procedures"

[2] FAA Order 5050.4B "National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions"

[3] Letter for Airport, Dated December 14, 2007, attached

[4] Environmental Assessment for Runway 3R-21L Rehabilitation dated March 2007. Finding Of No Significant Impact (FONSI) / Record of Decision (ROD), attached

[5] Part 150 Noise Maps Comparison from 1992 to 2004, attached

ADDITIONAL FAA ANALYSIS to SUPPORT CATEGORICAL EXCLUSION DETERMINATION

Under NEPA, the Federal Aviation Administration (FAA) is required to take into account environmental considerations when authorizing or approving Federal actions.

Typically, runway rehabilitation projects are given a "categorical exclusion" clearance under Table 6-2 of FAA Order 5050.4b and Section 310.e of Order 1050.1E. In order to receive this clearance the FAA determines that the project would not be subject to "extraordinary circumstances" (in accordance with FAA Order 5050.4b section 605). In 2007, the airport sponsor conducted environmental analysis for the Rehabilitation of Runway 3R-21L. Under that analysis the FAA determined that due to temporary off airport noise impacts a categorical exclusion could not be issued. The airport sponsor prepared an Environmental Assessment

entitled "Rehabilitation of Runway 3R-21L – March 2007". On March 14, 2007, the FAA issued a Finding of No Significant Impact (FONSI) / Record of Decision (ROD) for the project. This assessment concluded although there was no permanent change in aircraft flight tracks during construction (approximately 175 days), aircraft would be using non typical runways in order to maintain capacity at the airport. Aircraft that normally arrived and departed on Runway 3R/21L would be assigned to the crosswind Runway 9R/27L. This resulted in a temporary 1.5 DNL increase of noise levels over homes. Five of these homes had not received sound insulation under the sponsor's Part 150 program.

For this project, the temporary closure of Runway 9L/27R will not result in any unusual flight track changes. The closure of the runway is scheduled to occur during the summer months when the runway is not needed for crosswind operations. The construction schedule is set up over two summers to ensure this runway will be available for usage during the winter and crosswind conditions. The annual usage of this runway is under five percent and the 65 DNL noise contour is on airport property. Therefore, based upon the prior EA and the 2004 noise maps the rehabilitation of Runway 9L/27R will not cause any "extraordinary circumstances".

However, as part of the project, the intersection of Runway 9L/27R and 3L/21R will also need to be rehabilitated. For this to occur, Runway 3L/21R will need to be closed for a short period of time (estimated 60 days). During this time period aircraft that typically depart Runway 3L or 21R will use one of the three other parallel runways to depart (3R/21L, 4R/22L or 4L/22R). Runway 3L/21R does not have instrument approaches and is normally used for aircraft departures. Due to the complexity of runway intersections the FAA Air Traffic Control Tower does not plan to use the other crosswind Runway 9R/27L as a replacement runway during construction.

The airport sponsor has committed to using public forums, meetings and local media to ensure that the local community understands the nature of the proposed construction and any potential temporary changes in flight operations.

The FAA has contacted the firm conducting the Part 150 study and based upon their judgment and review of Figure D-29 (attached) we do not anticipate that the short term closure of Runway 3L/21R will create a 1.5 DNL increase over homes that have not received sound insulation.

Therefore, the FAA concludes that this project should receive a categorical exclusion.

ATTACHMENT 9: MEETING MINUTES FOR PLANNING AND AIRSPACE COMMISSION, FEBRUARY 1, 2006

jacobsen**daniels** associates, llc
planning and implementation consultants

MEETING MINUTES/STATUS REPORT

Project: ***DTW PAC Meeting***

Meeting Date: ***February 1, 2006***
Meeting Location: ***FAA ADO Offices***
Meeting Time: ***10:00 AM***

Name:	Organization:	Email:
Ali Dib	WCAA	ali.dib@wcaa.us
Ken Szymanski	WCAA	kenneth.szymanski@wcaa.us
Bruce Greenberg	WCAA	bruce.greenberg@wcaa.us
Steve Wiesner	WCAA	steve.wiesner@wcaa.us
Dianne Walker	WCAA-Operations	dianne.walker@wcaa.us
Brad Jacobsen	JDA	brad@jacobsendaniels.com
David Welhouse	FAA DET-ADO	david.welhouse@faa.gov
Ernest Gubry	FAA-ADO	ernest.gubry@faa.gov
Irene Porter	FAA-ADO	irene.porter
Lorne Cass	NWA	lorne.cass@nwa.com
Paul VanFossan	NWA	paul.vanfossan@nwa.com
John Chamberlain	FAA	john.chamberlain@faa.gov
Rodney Harris	FAA	rodney.a.harris@faa.gov
Patricia Bynum	FAA	patricia.bynum@faa.gov
Bud Pierce	FAA	[redacted]
Mark Manning *	Kimley-Horn	
J.J. Morton *	Kimley-Horn	
* Telecon		

ITEM NO.	ITEM OF DISCUSSION	RESP.
	Introduction	
	Attendee introductions and role call.	
	Update Current Scope of Project	
1.0	The meeting was initiated with JDA and WCAA reviewing with the group the current status of the 3R rehabilitation project, including the following: ➢ The runway rehabilitation is now being designed as a full replacement the entire length of the runway instead of the previous plan of overlaying the ends with asphalt. ➢ The rehabilitation of Taxiway W is also being contemplated for inclusion in	

ITEM NO.	ITEM OF DISCUSSION	RESP.
	the project, however that decision has not yet been made. It was the feeling of JDA that the rehabilitation of Taxiway W could be phased to avoid any significant operational impacts during construction.	
	Operating Scenarios and Throughputs	
2.0	JDA reviewed the various operating scenarios and throughputs that will be utilized when the runway is not available and initiated a discussion of weather incorporating a phasing plan that allowed limited use of Runway 3R-21L at a reduced length. The following was discussed: **2006 Construction Season** **Phasing (North or South in 2006)** Kimley-Horn indicated that their thinking at this point was to do the north end of the runway in 2006, because the length required to complete the intersection of Runway 21L and 27R could be scheduled within the available construction season (August through mid-November). JDA discussed the potential benefit of reconstructing the south end in 2006 in order to maintain Runway 9R-27L in 2007, when Runway 3R-21L would be out of service. Operationally, it is important to maintain Runway 9R-27L when Runway 3R-21L is out of service because most of the alternative operating configurations require Runway 9R-27L to achieve higher throughput capacities. ***Action Item – Kimley-Horn to provide information regarding the cost associated with completing the south end (2,600 + feet - 3R end to north side of Taxiway Tango) in 2006. The cost difference will be stated as the incremental cost of condensing the work into the shortened construction period, versus a more typical construction schedule (i.e. night work, double shifts, additional equipment, etc.).*** **Relocated Threshold** The group discussed the potential for relocating the threshold during construction in 2006 to allow for operations on the shortened runway. The group concluded that 6,000-ft of available runway would accommodate a significant percentage of aircraft and it made sense to do so. Relocating the threshold in 2007 (while re-constructing the north end) does not seem to make sense since it would not achieve significant capacity increases. However, completing the northern-most portion of the runway first, to allow operation on Runway 27R, is desirable. It was concluded that only visual operations should be maintained in 2006. Relocating the ILS and localizer equipment and developing the necessary procedures for instrument operations was not possible. ***Action Item – Ernie Gubry to verify that it is either 1) not feasible to relocate the ILS and or localizer, including equipment testing and flight check, reimbursable agreement or 2) develop new approach procedures for the relocated threshold by August 2006.*** **2007 Construction Season** **Phasing**	

ITEM NO.	ITEM OF DISCUSSION	RESP.
	Presuming that the 3R end was re-constructed in 2006, it is not beneficial to temporarily relocate the 21L threshold in 2007. Similar operational capability can be achieved by using Runway 9R-27L instead of the shortened Runway 3R-21L without the incremental additional construction cost associated with relocating the threshold. ***Action Item – Kimley-Horn to provide the incremental additional cost of relocating the threshold of either the 21L end or the 3R end.***	
	Environmental Documentation and Other	
3.0	Environmental Documentation The project as currently envisioned, with an element in 2006 and another element in 2007, would meet the requirements of a Categorical Exclusion. It is not anticipated that a noise analysis will be necessary because no element of the project will exceed 6-months in duration and, as such, is considered a temporary impact. Community coordination to ensure complete disclosure of the project and temporary impacts will be required. JDA will initiate the documentation using the Categorical Exclusion checklist. Other (Liquidated Damages) Liquidated damages were discussed in terms of the financial impact to the carriers and airport. In terms of the carriers, it was estimated that for NWA, the financial impact is about $27k a day. NWA stated that all of that cost is not directly applicable and enforceable in terms of LDs for the contractor. It was discussed that the delay fuel costs are attributable, but all the block changes aren't. The carriers would essentially have to eat the block during the closure. The pertinent question is "what the costs will be on contract day ending date +1 when the block changes back to the original, but the runway isn't done. For NWA, it becomes a system time ripple problem, which is extremely difficult quantify. The conclusion of the group was that given the following, liquidated damages in the range of $15-$20 were reasonable and suggested to the design team and WCAA for consideration. (1) Estimate provided by NWA of $27k, of which not all of that cost is attributable to the contractor, (3) The estimate of $27k does not include the cost of the other carriers and tenants at DTW and; (4) The estimate does not include the cost incurred from management of the addition construction period. Next Meeting at 2/__at 10am Conference Room 1, Smith Terminal Mezzanine, Detroit Metro Airport.	

ADJOURN –

The foregoing constitutes our understanding of the items discussed. Participants are required to review these items and advise the author, in writing, of any errors or omissions within 7-days of receipt of these meeting minutes.

Submitted on: February 7, 2006

Submitted by: Brad Jacobsen

*jacobsen**daniels** associates*
201 e. liberty street, suite 16
ann arbor, mi 48104
p. (734) 623-4431
f. (734) 623-4461

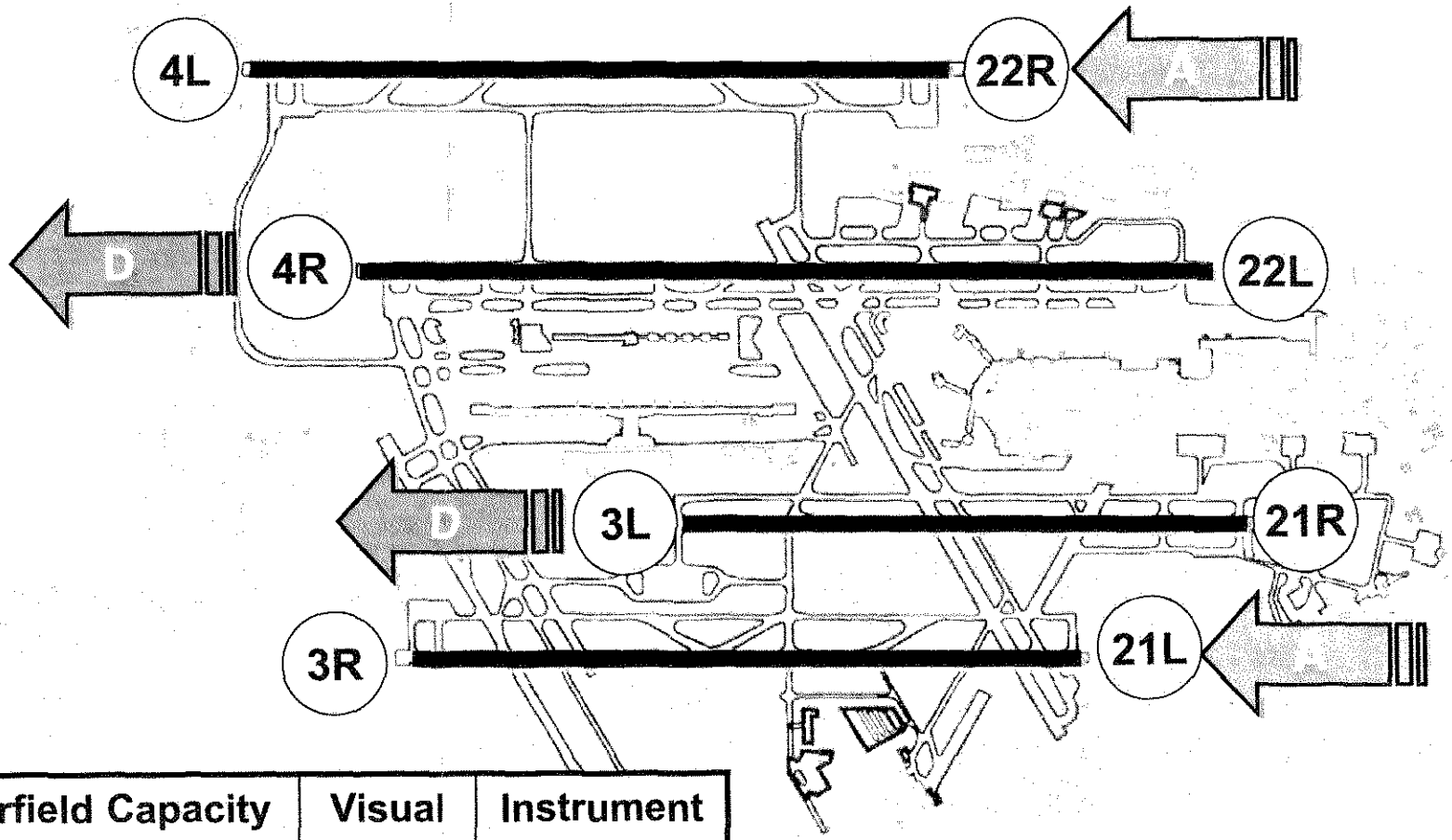
Planning and Airspace Committee Distribution List

Name:	Organization:	Email:
Ali Dib	WCAA	ali.dib@wcaa.us
Brad Jacobsen	JDA	brad@jacobsendaniels.com
Brian Ruppert	NWA	brian.ruppert@nwa.com
Cheri Walter	FAA	Cheri.L.Walter@faa.gov
David Welhouse	FAA DET-ADO	david.welhouse@faa.gov
Dianne Walker	WCAA-Operations	dianne.walker@wcaa.us
Ernest Gubry	FAA-ADO	ernest.gubry@faa.gov
John Chamberlain	FAA AT	John.chamberlain@faa.gov
John Guth	FAA - DTW TMO	John.Guth@faa.gov
John Lott	AGL-620	John.Lott@faa.gov
Lorne Cass	NWA	Lorne.cass@nwa.com
Paul VanFossan	NWA	paul.vanfossan@nwa.com
Steve Wiesner	WCAA	steve.wiesner@wcaa.us
Marcia Boliard	DTW ATCT	Marcia.Boliard@faa.gov
Mary Loeffelholz	NWA	mary.loeffelholz@nwa.com
Matt Johnson	JDA	matt@jacobsendaniels.com
Mike Ebels	FAA	Michael.L.Ebels@faa.gov
Monica Keyes	FAA-AF	monica.keyes@faa.gov
Patricia Bynum	FAA	Patricia.bynum@faa.gov
Paul VanFossan	NWA	Paul.vanfossan@nwa.com
Rick Murphy	FAA	Rick.Murphy@faa.gov
Robert Alexander	FAA	Robert.Alexander@faa.gov
Rodney Harris	DTW ATCT	Rodney.A.Harris@faa.gov

ATTACHMENT 10: POWERPOINT PRESENTATION FROM PLANNING AND AIRSPACE COMMISSION, FEBRUARY 1, 2006

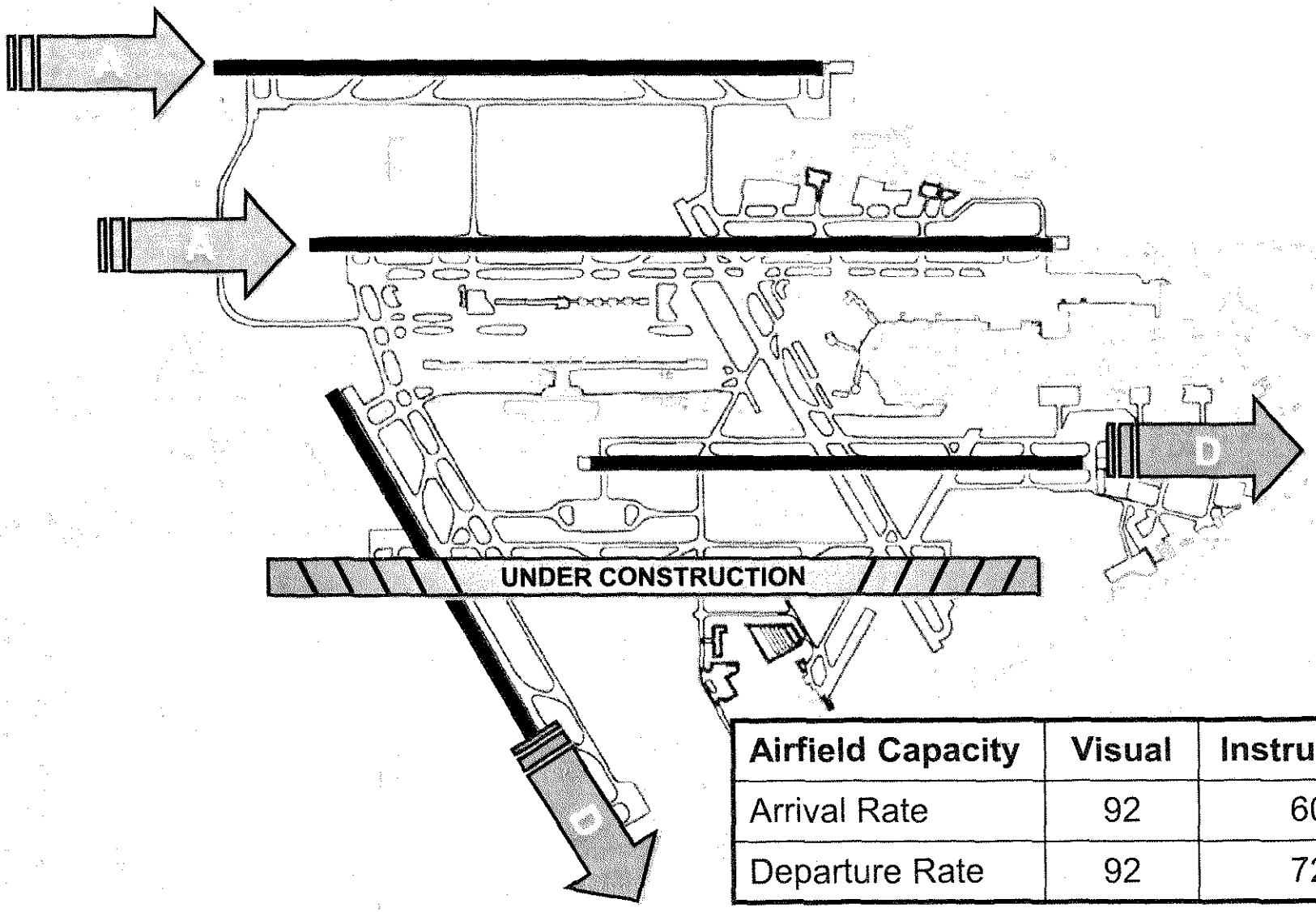
Existing Conditions

**Includes both north and south flow conditions*



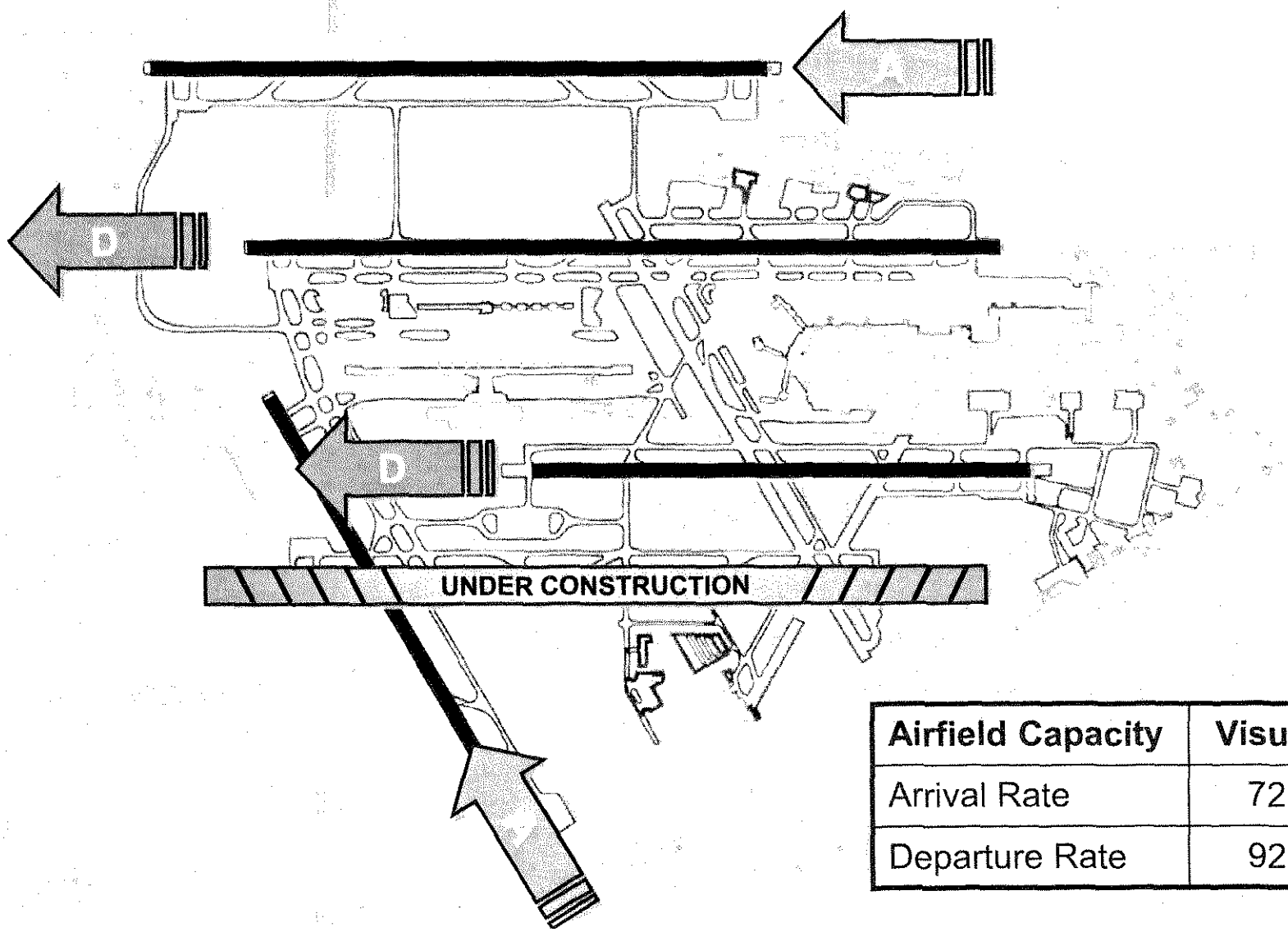
Airfield Capacity	Visual	Instrument
Arrival Rate	92	72
Departure Rate	92	72

Option 1



Airfield Capacity	Visual	Instrument
Arrival Rate	92	60
Departure Rate	92	72

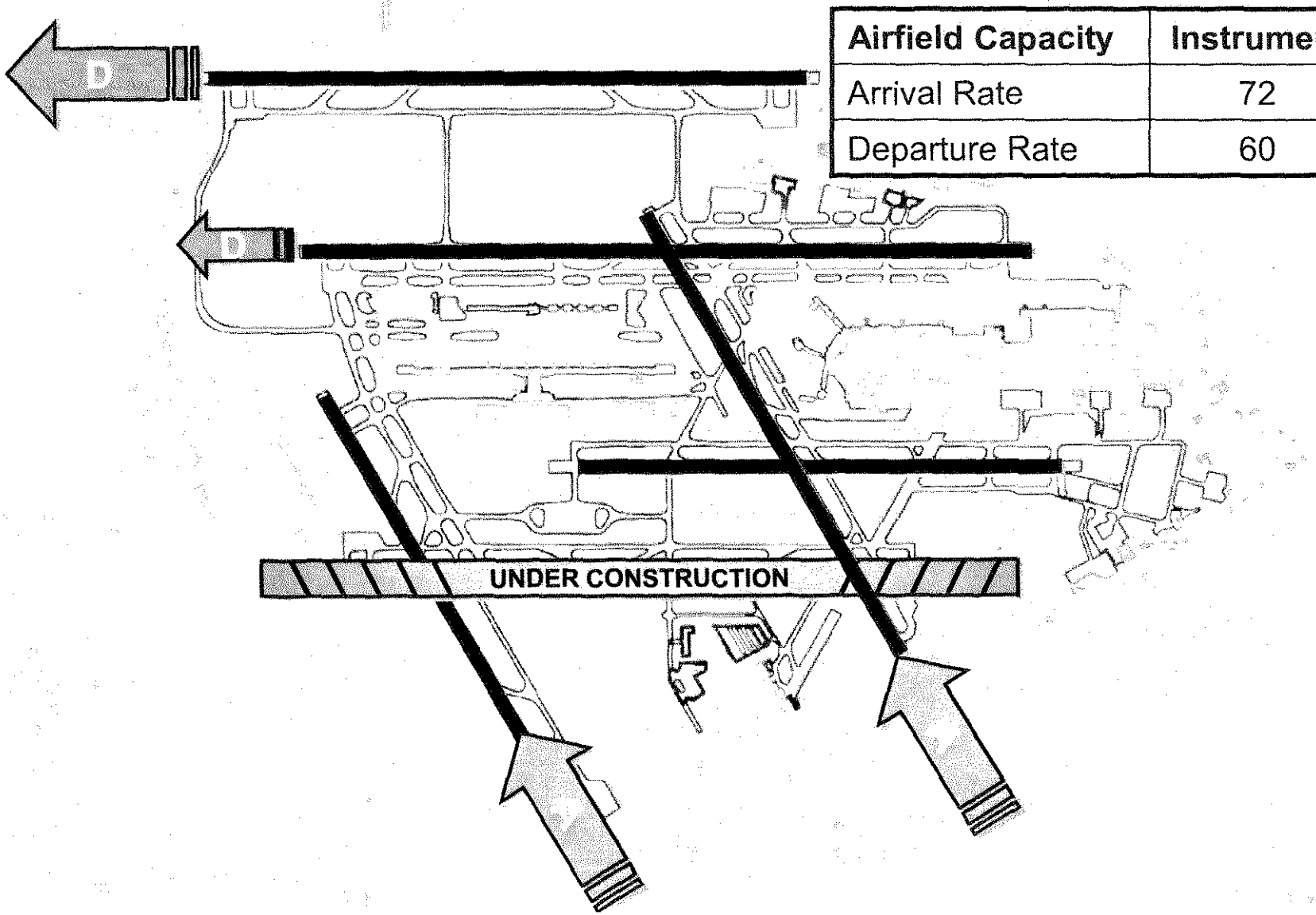
Option 2



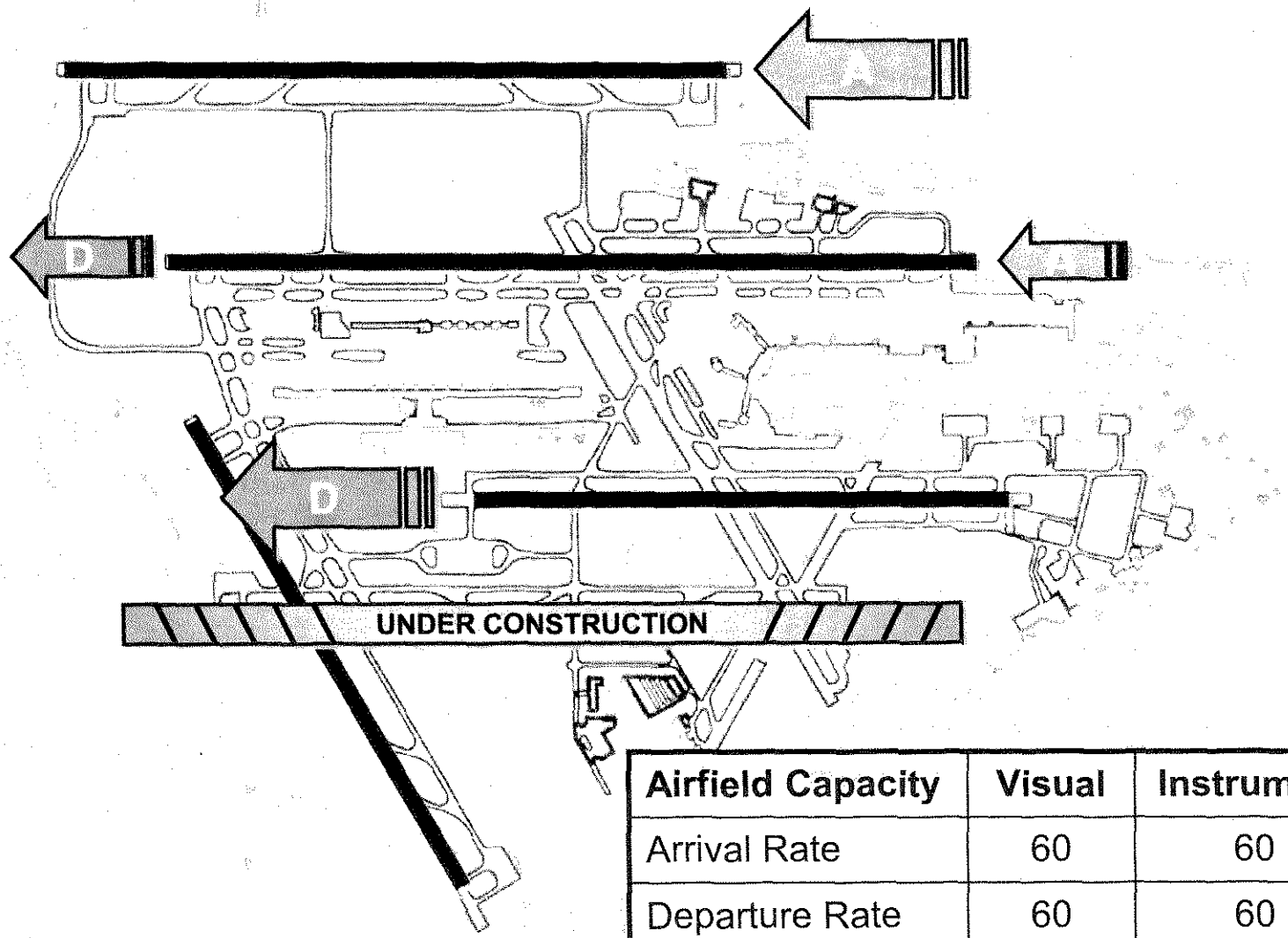
Airfield Capacity	Visual
Arrival Rate	72
Departure Rate	92

Option 3

Airfield Capacity	Instrument
Arrival Rate	72
Departure Rate	60



Option 4



Airfield Capacity	Visual	Instrument
Arrival Rate	60	60
Departure Rate	60	60

ATTACHMENT 11: MEETING MINUTES FOR PUBLIC INFORMATION SESSION, MARCH 1, 2007

DETROIT METRO • WILLOW RUN
WAYNE COUNTY AIRPORT AUTHORITY

MEETING MINUTES

Detroit Metropolitan Wayne County Airport
Runway 3R-21L Rehabilitation Project

JDA JOB NO: 90100404-17

MEETING DATE: Thursday - March 1, 2007: 5:00 P.M. – 7:00 P.M.

MEETING: Public Information Session (Runway 3R-21L Rehabilitation Project)

ATTENDEES:
Deven Judd, JDA
Matt Johnson, JDA
Brian Ruppert, NWA
Katherine Calhoun, Public
Robert Calhoun, Public
Ernest Gubry, FAA
Tom Wilson, Public
Michelle Plawecki, WCAA
Tim Keyes, City of Romulus
Michael Conway, WCAA
Wayne Sieloff, WCAA
Dan Kerber, WCAA
Steve Wiesner, WCAA
Brad Jacobsen, JDA

ITEM NO.	ITEM OF DISCUSSION	RESPONSIBLE PARTY
I	**Introduction**	
	Wayne Sieloff gave a brief overview of the purpose of the public information session as well as introduced Matt Johnson. The purpose of the information session is to notify and brief the interested public about the up-coming project to rehabilitate Runway 3R-21L at DTW. The session has been designed to inform the public on the project's purpose/need, scope, schedule, and anticipated temporary changes to the operations at the Airport. Matt Johnson then gave a brief presentation of the Runway 3R-21L Rehabilitation Project.	WAYNE SIELOFF AND MATT JOHNSON
II	**Purpose/Need**	
	Runway 3R-21L: ➢ Constructed in 1976 ➢ Increasing repair & maintenance (extensive patching) in the recent past ➢ Repair & maintenance (patching) is no longer a viable solution to maintaining the runway. ➢ Runway is in jeopardy of being closed due to safety reasons ➢ Full rehabilitating of the runway is now required	MATT JOHNSON

III	**Project Scope/Limits**	

	Project will include the following:
	➢ Demolition, removal, and full depth replacement of pavement:
	  ➢ Northern most 7,600 feet
	  ➢ Blast pad on each end of runway
	  ➢ Adjacent stub taxiways
	➢ There will also be a batch plant on the project site which will reduce the construction traffic on Middlebelt Rd. A construction traffic entrance off of Middlebelt Rd. will be provided.
	
	The construction period for the project shall be approximately 175-days during the construction season of (Spring – Fall)
		MATT JOHNSON

IV	**Runway Use Before, During and After the Project**	
	Before Construction Begins: ➢ Under typical operating conditions and configurations DTW utilizes Runways 4L-22R and 3R-21L for arrivals and 4R-22L and 3L-21R for departures. In situations where wind and weather do not allow the use of the 4/22s and 3/21s, the crosswind runways are utilized. During Construction: ➢ When operating in a South flow, DTW will utilize Runways 22R and 22L for arrivals. Runways 22L and 21R will be used for departures with mixed operations on 22L. During select times during the day when the activity requires additional capacity, Runway 27L will be utilized for arrivals. ➢ When operating in a North flow, DTW will utilize 4L and 4R for arrivals. Runway 4R and 3L will be used for departures with mixed operations on 4R. During select times during the day when the activity requires additional capacity, Runway 9R will be utilized for departures. After Construction: ➢ Operation will go back to as it was prior to construction.	MATT JOHNSON
V	**Questions & Comments**	
	<u>Questions:</u> ➢ Where will the construction entrance be located? The construction entrance will be located off of Middlebelt Rd. ➢ Tom Wilson: Assumes the project will utilize a large volume of water. What will the impact be and will that impact affect the water treatment	MATT JOHNSON & AUDIENCE

	facility by pulling more water than usual? Comments: ➢ WCAA committed to holding ongoing meetings with community leaders during the project which will serve as updates to the project. ➢ Attendees were reminded during the meeting that this is a temporary situation, only during the rehabilitation, and that operations will return to normal once the construction is completed. Additional Information: ➢ An Environmental Assessment (EA) has been prepared to document the anticipated temporary environmental, economic, and social effects. – Wayne County Airport Authority Administrative Offices (Smith Terminal-Mezzanine, Detroit, MI 48242) – Wayne County Airport Authority Noise House (32629 Pennsylvania Rd, Romulus, MI 48174) – Federal Aviation Administration, Detroit Airports District Office (11677 South Wayne Rd, Romulus, MI 48174) – Romulus Public Library (11121 Wayne Rd, Romulus, MI 48174) – Taylor Public Library (12303 Pardee Rd, Taylor, MI 48180) – Official DTW Website – www.metroairport.com ➢ Comments can be submitted, no later than March 11, 2007, to: –Mr. Ernest Gubry, Federal Aviation Administration Ernest.gubry@faa.gov	
VI	**Action Items**	
	Revise the Draft Environmental Assessment document to reflect the following: ➢ Delete draft off of the document ➢ Add comments to the public outreach section to reflect this meeting, who attended and the questions that were raised ➢ Give a brief description of the presentation	ERNEST GUBRY

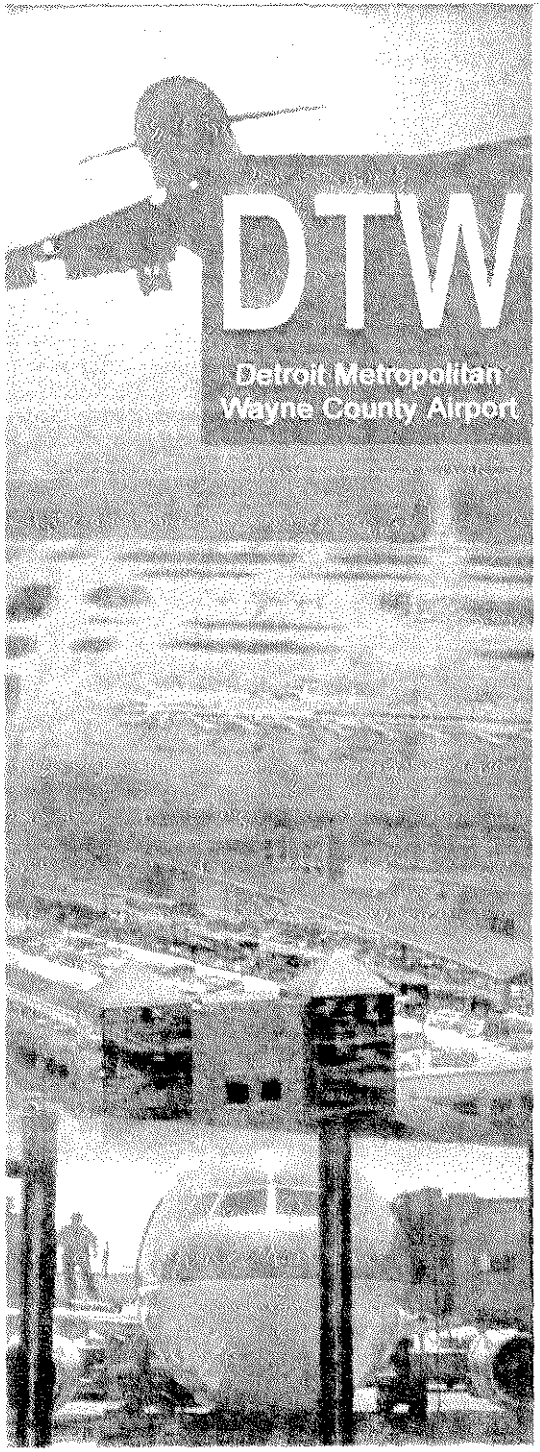
ADJOURN – 5:00 P.M.

Meeting Summary:

Submitted by:
Deven M. Judd

*jacobsen**daniels** associates*
121 Pearl St.
Ypsilanti, mi 48197
(734) 961-3200 phone
(734) 961-3204 fax

ATTACHMENT 12: POWERPOINT PRESENTATION FROM PUBLIC INFORMATION SESSION, MARCH 1, 2007



DETROIT METRO • WILLOW RUN
WAYNE COUNTY AIRPORT AUTHORITY

000101

Runway 3R-21L Rehabilitation Project

Public Information Session

March 1, 2007

Agenda

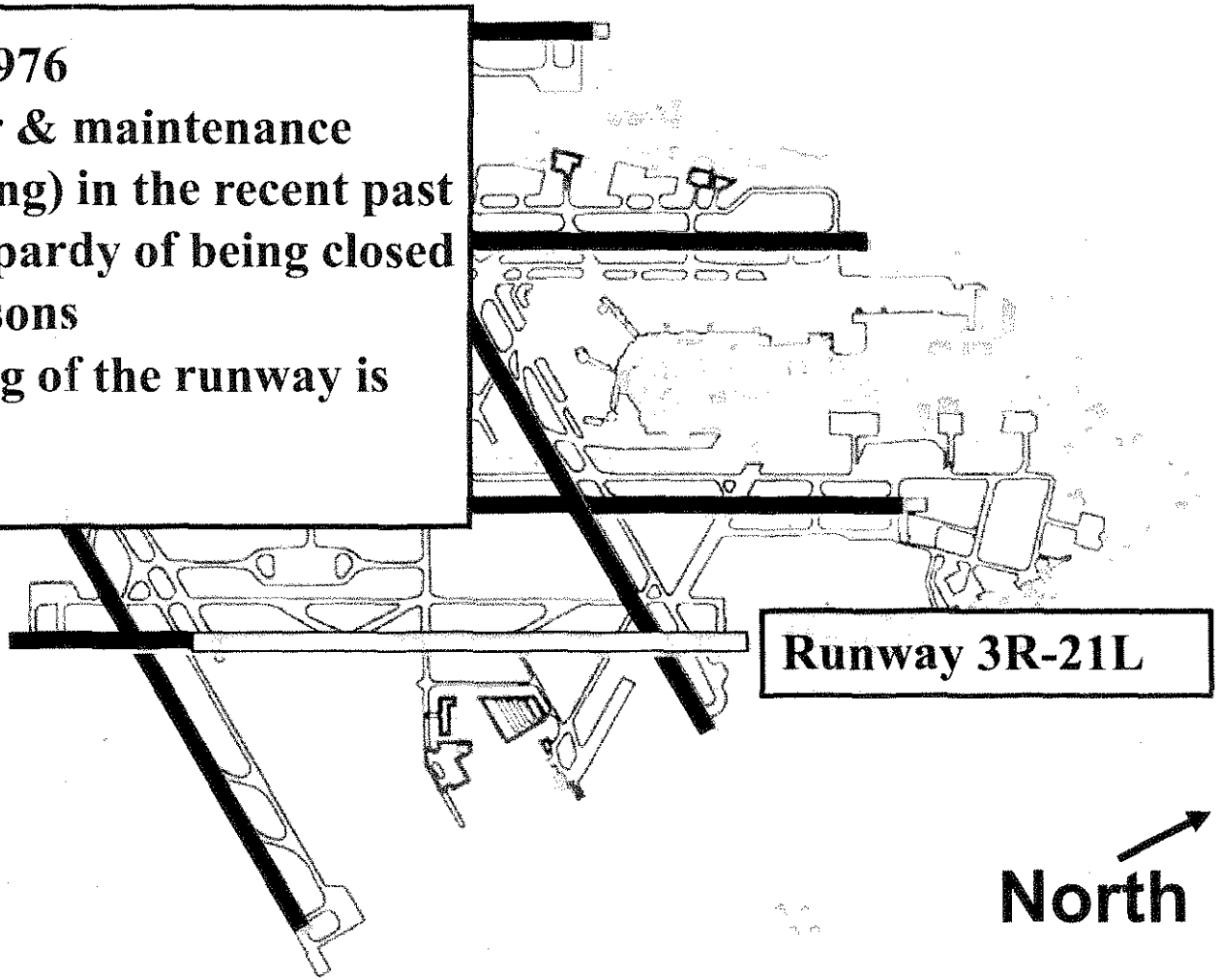
000102

- Purpose/Need
- Project Scope
- Project Timing
- Temporary Operational Changes & Impacts

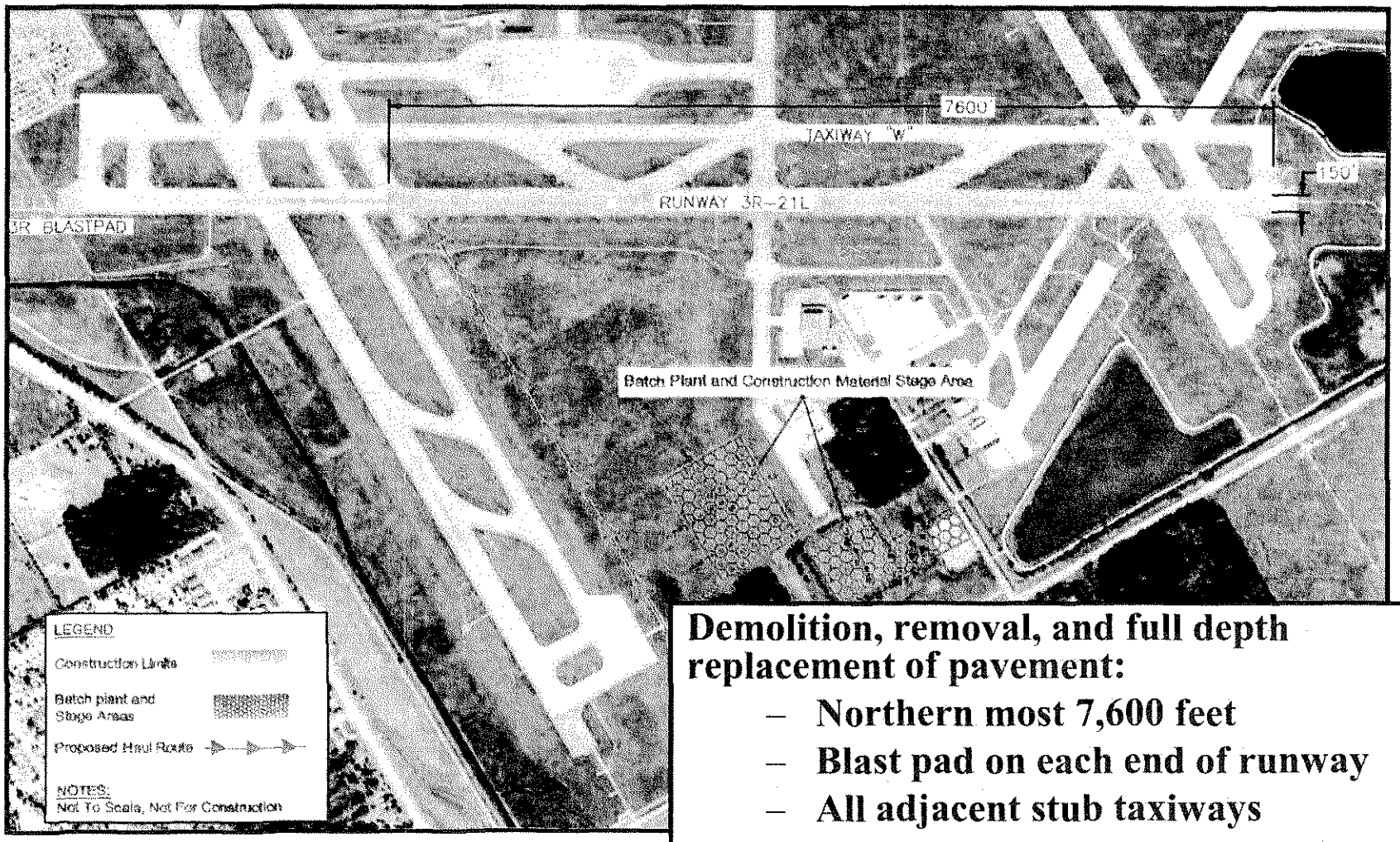
Project Definition

000103

- Constructed in 1976
- Increasing repair & maintenance (extensive patching) in the recent past
- Runway is in jeopardy of being closed due to safety reasons
- Full rehabilitating of the runway is now required



Project Scope/Limits



000104

Demolition, removal, and full depth replacement of pavement:

- **Northern most 7,600 feet**
- **Blast pad on each end of runway**
- **All adjacent stub taxiways**

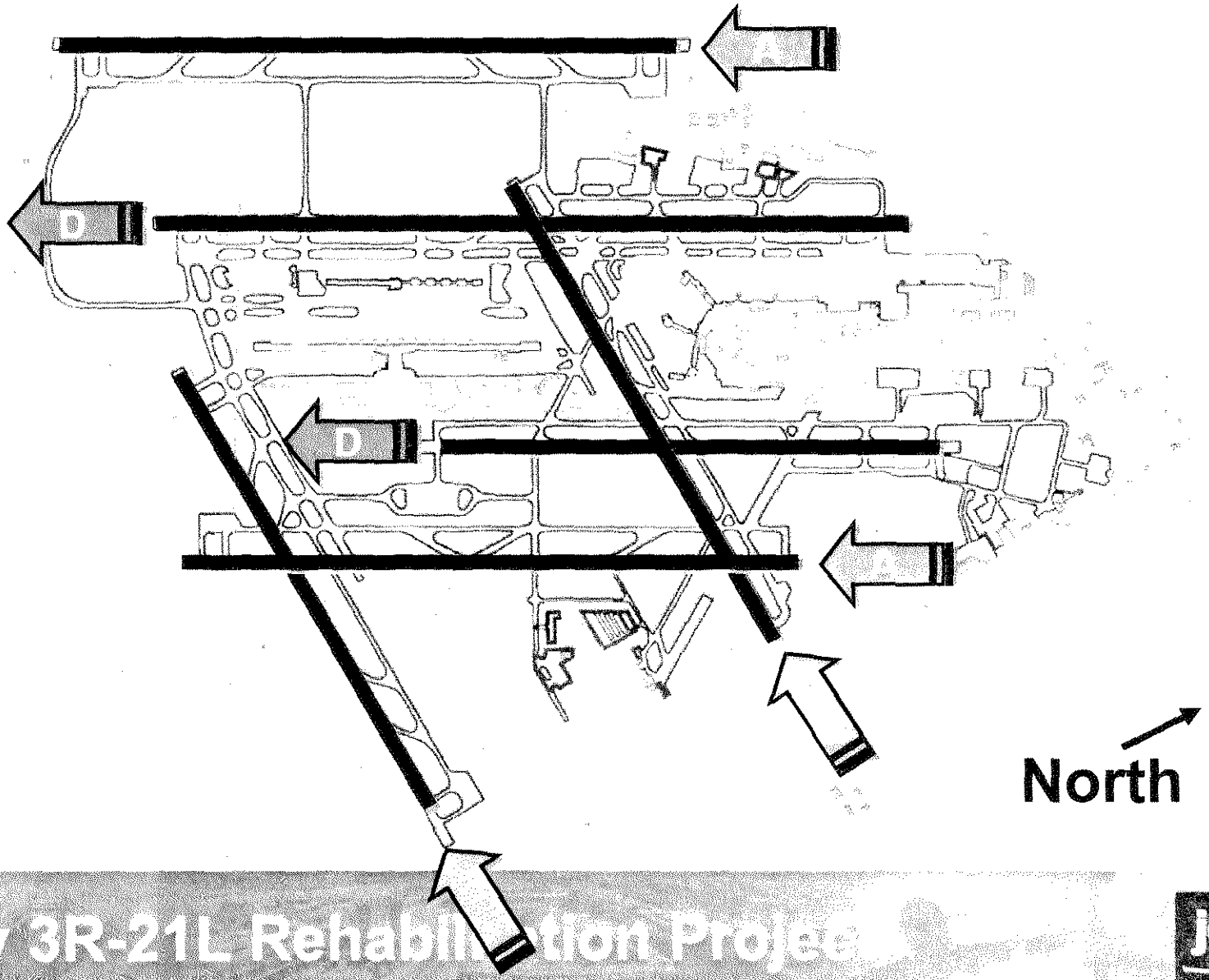
Project Timing

000105

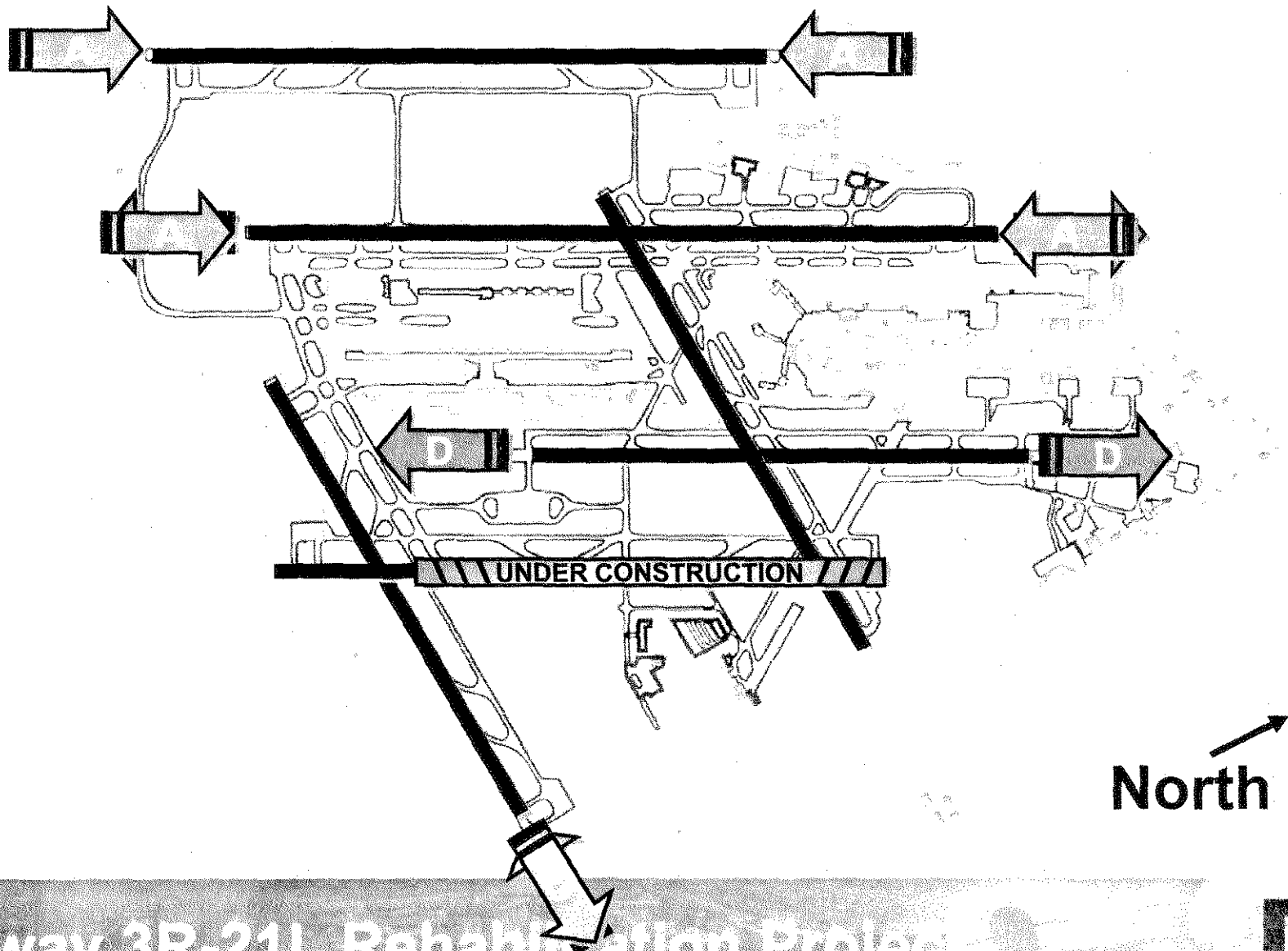
- 175-days construction period
- 2007 construction season (Spring – Fall)

Typical Runway Use

000106



Temporary Runway



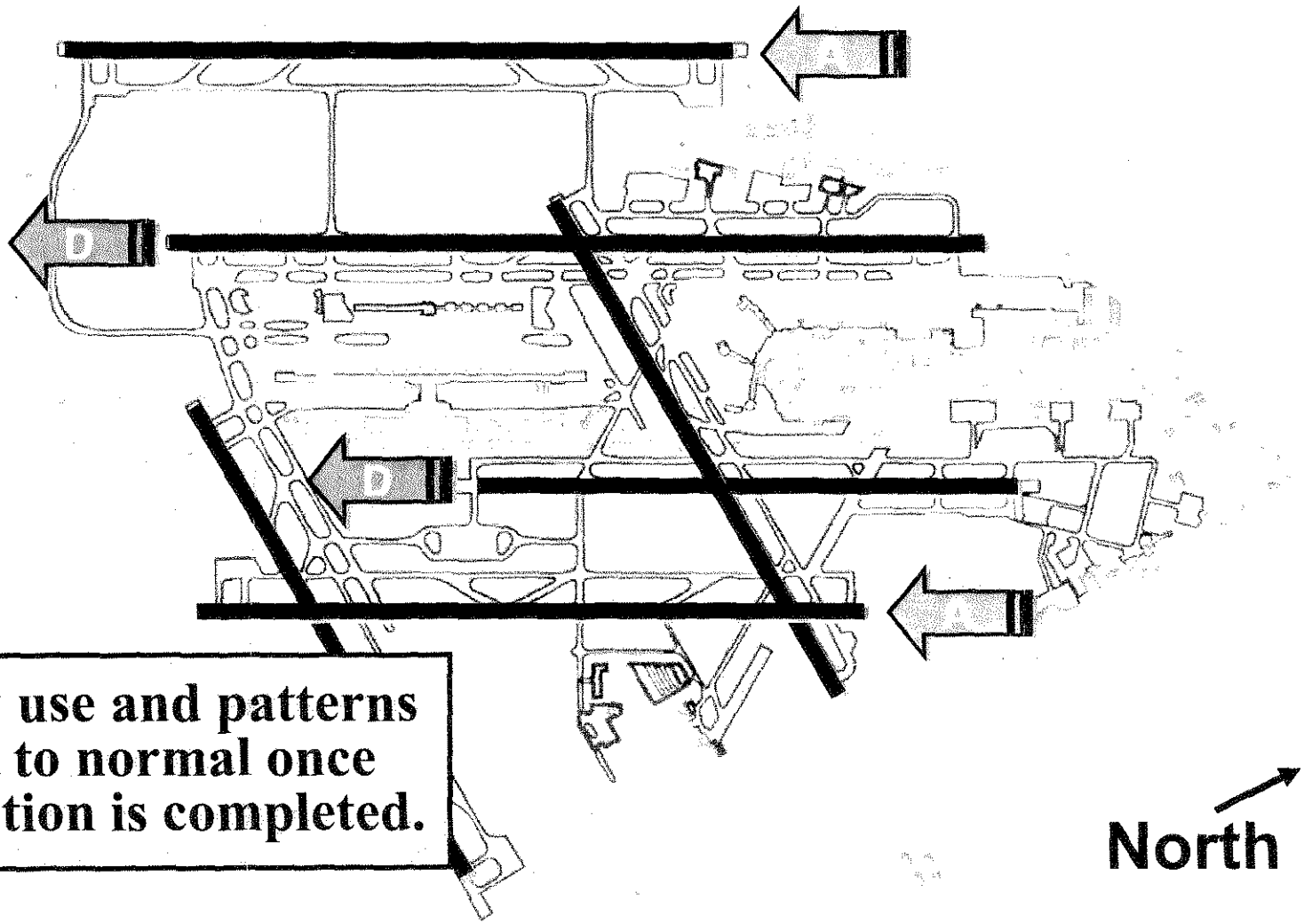
000107

Runway 3R-21L Rehabilitation Project

jda

Runway Use

000108



Runway use and patterns return to normal once construction is completed.

North

Questions

Next Steps

000110

- An Environmental Assessment (EA) has been prepared to document the anticipated temporary environmental, economic, and social effects.
  - Wayne County Airport Authority Administrative Offices (Smith Terminal-Mezzanine, Detroit, MI 48242)
  - Wayne County Airport Authority Noise House (32629 Pennsylvania Rd, Romulus, MI 48174)
  - Federal Aviation Administration, Detroit Airports District Office (11677 South Wayne Rd, Romulus, MI 48174)
  - Romulus Public Library (11121 Wayne Rd, Romulus, MI 48174)
  - Taylor Public Library (12303 Pardee Rd, Taylor, MI 48180)
  - Official DTW Website – www.metroairport.com
- Comments can be submitted, no later than March 11, 2007, to:
  - Mr. Ernest Gubry, Federal Aviation Administration Ernest.gubry@faa.gov