

ENVIRONMENTAL ASSESSMENT (Draft 2.0)  
Lanett Regional Airport  
Entrance Road and Airport Improvements Project  
Lanett, Chambers County, Alabama

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December 18, 2023

**This environmental assessment becomes a Federal Document when evaluated, signed, and dated by the responsible FAA official.**

\_\_\_\_\_  
Responsible FAA Official

\_\_\_\_\_  
Date

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### ACRONYMS AND ABBREVIATIONS

ALP	Airport Layout Plan
BMPs	Best Management Practices
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CRA	Cultural Resource Assessment
EA	Environmental Assessment
EJ	Environmental Justice
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GHGs	Greenhouse Gases
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OFA	Runway Object Free Area
PJD	Preliminary Jurisdictional Determination
PSA	Primary Study Area
RCRA	Resource Conservation and Recovery Act
RPZ	Runway Protection Zone
SHPO	State Historic Preservation Office
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
WOTUS	Waters of the U.S.

## CHAPTER 1 PROPOSED ACTION

### 1.1 Introduction

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) (42 United States Code 4321-4335) and the Council on Environmental Quality (CEQ) (Title 40 Code of Federal Regulations 1500-1508 regulations). Guidance for the preparation of the EA includes the FAA's *Environmental Impacts: Policies and Procedures* (FAA Order 1050.1F), the *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions* (FAA Order 5050.4B), and the FAA's 1050.1F 2020 Desk Reference. The EA reviews the Proposed Action and evaluates the potential environmental effects associated with disturbance during construction or operations once the project is complete.

### 1.2 Proposed Action

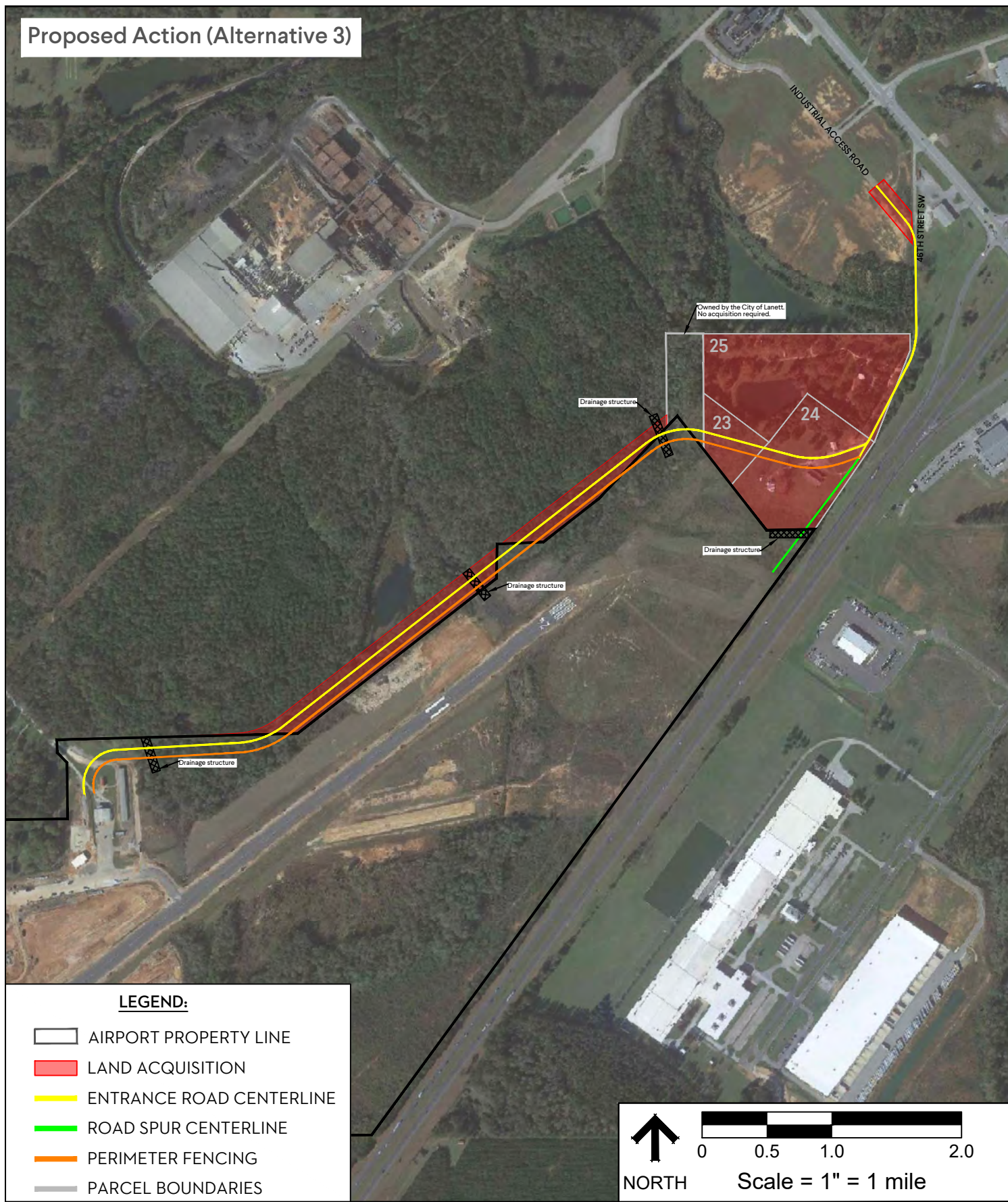
The Lanett Regional Airport intends to construct a new entrance road and complete various improvements. The existing entrance road is routed through several sensitive community areas including a school zone, close-proximity residential areas, a railroad crossing, and a significant intersection. A new road is proposed which will avoid these areas and provide a more direct and dedicated route for the airport. Additionally, a recently completed runway reorientation and extension project at the airport has introduced new obstructions within the Runway 24 approach which require removal.

The road project and obstruction removal will require the acquisition of various parcels of land. The obstruction removal component of the project will require the removal of trees and structures within the obstruction areas. Additional tree clearing as well as the draining of two (2) ponds will also be completed in order to reduce wildlife hazards. **Figure 1.0** shows the location of all aspects of the proposed action. The following is a list of all major components of the proposed action:

1. Acquisition of various parcels (Figure 1.0, red shaded areas)
2. Construction of a new entrance road along 46<sup>th</sup> Street SW, turning west near the end of the existing runway protection zone (RPZ), and extending southwest to terminate at the new airport terminal.
3. Construction of a road spur off of the main entrance road that would extend southeast and parallel Interstate 85. The road spur would provide access to the property to the east of the runway for potential future development.
4. Installation of perimeter fencing on the interior of the new entrance road.
5. Removal of obstructions, including trees and structures, within the Runway 24 approach (Figure 1.0, parcels 23, 24, 25).
6. Draining of two (2) ponds as well as additional tree clearing in order to minimize wildlife hazards. The additional tree clearing is proposed for the area between the perimeter fence and the runway.

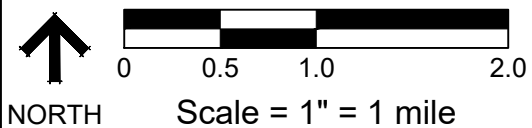


Proposed Action (Alternative 3)



**LEGEND:**

- AIRPORT PROPERTY LINE
- LAND ACQUISITION
- ENTRANCE ROAD CENTERLINE
- ROAD SPUR CENTERLINE
- PERIMETER FENCING
- PARCEL BOUNDARIES



REF. SHEET: ESRI WORLD STREETS  
DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

**Lanett Regional Airport  
Entrance Road and Improvements Project**  
Lanett, Chambers County, Alabama

**Figure 1.0**

PROPOSED ACTION  
GMC # EMGM21A010  
DATE: 08.14.23  
DRAWN BY: AYH

2660 East Chase Lane, Suite 200  
Montgomery, AL 36117  
T 334.271.3200  
GMCNETWORK.COM



## CHAPTER 2 PURPOSE AND NEED

### 2.1 Statement of Purpose and Need

A new reoriented and extended runway as well as a new airport terminal have recently been constructed at the Lanett Regional Airport. These improvements were completed in order to allow for additional business aircraft to utilize the airport by providing a runway with adequate length for larger aircraft. These businesses include the University of Alabama at Birmingham Hospital and Kia Motor Manufacturing Company. The longer runway and new terminal building also create a more desirable terminal environment which provide the opportunity to attract additional aeronautical and non-aeronautical business such as Maintenance, Repair, and Overhaul (MRO) facilities. Currently, the Chambers County Development Authority and the City of Lanett utilize the new terminal for their daily operations.

The current vehicle route to the airport from Interstate 85 is via South Phillips Road to Cusseta Road and then to 51<sup>st</sup> Avenue Southwest. Airport traffic along this route must navigate through a school zone for Huguley Elementary School, a significant intersection at South Phillips Road and Cusseta Road, a rail crossing, and residential neighborhoods. This route is not ideal for the community or the airport, especially given the new runway project which has opened the airport to more users, aeronautical and non-aeronautical. Therefore, increasing the number of transient users that are not familiar with the local traffic patterns such as the school zone and residential areas.

Over the last 5 years, according to the Alabama Criminal Justice Information Center's ADVANCE<sup>1</sup>, there were 4153 accidents in Chambers County with 50 of those being located along the direct route to the airport from Interstate 85. By applying the County wide KABCO scale (values correlate to the severity of injuries), and corresponding monetized values found in the June 2018 Department of Transportation Benefit-Cost Analysis Guidance, this results in a 5-year safety benefit of \$6.2M should the traffic have an alternate direct road to the airport. Considering an estimated construction cost of \$5,943,250 and the design life maintenance cost of \$300,926, the benefits exceed the estimated costs. **Table 2.0** below depicts the values utilized in the ADVANCE analysis.

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<sup>1</sup> ADVANCE was established by the Alabama Criminal Justice Information Center (ACJIC) in order to provide the criminal justice and public safety communities with the latest advances in analytic and visualization technologies .ADVANCE was developed for ACJIC by Harding University and The University of Alabama's Center for Advanced Public Safety (CAPS)

**Table 2.0: ADVANCE Analysis Summary**

KABCO Values	Table A-1 Monetized Values	Chambers County, AL	Percentage	I-85 to Airport	5 year Monetary Value
Fatal Injury	\$ 9,600,000.00	37	0.9	0.445461	\$ 4,276,426.68
Incapacitating Injury	\$ 459,100.00	186	4.5	2.239345	\$ 1,028,083.31
Non-Incapacitating Injury	\$ 125,000.00	391	9.4	4.70744	\$ 588,430.05
Possible Injury	\$ 63,900.00	358	8.6	4.310137	\$ 275,417.77
Property Damage Only	\$ 3,200.00	3059	73.7	36.8288	\$ 117,852.16
Unknown	--	122	2.9	1.468818	\$ -
<b>Total</b>		<b>4153</b>		<b>50</b>	<b>\$ 6,286,209.97</b>

Additionally, the Airport Layout Plan (ALP) depicts future development of the area east of the new runway. As the current vehicle route exists today, there is no access to this area for future development.

In summary, the proposed project would involve the construction of a new airport entrance road that would avoid sensitive areas such as a school zone, railroad crossings, and residential areas. The new road would provide a more direct path to the airport from Interstate 85 and would provide access to the proposed future development to the east of the runway, as shown on the ALP. The new entrance road would provide a safer vehicle route for airport users and, most importantly, provide a safer environment for citizens along the current route while minimizing airport traffic within the school zone and residential areas.

The recent runway reorientation and extension project has also introduced new obstructions within the Runway 24 approaches. As outlined in the Airport Improvement Program Grant Assurances, appropriate actions are required in order to mitigate airport hazards and prevent the establishment or creation of future airport hazards. One of the assurances requires the protection of terminal airspace used in instrument and visual operations to the airport. The proposed project would include the removal of tree and potential structure obstructions within the Runway 24 approaches. Wildlife hazards would be mitigated by draining two (2) ponds at the Runway 24 end, constructing a perimeter fence on the interior of the new entrance road, and removing trees within the proposed fence. These measures would eliminate all forested habitat on the interior of the new perimeter fence and would reduce the amount of open water habitat within the Runway 24 approach.



## CHAPTER 3 ALTERNATIVES

This section describes the capabilities and limitations of alternative ways to meet the proposed need described in Chapter 2. To remain compliant with applicable FAA regulations, the guidelines established in FAA Order 1050.1F were followed in the consideration of logical alternatives to the Proposed Action.

Per FAA Order 1050.1F, “There is no requirement for a specific number of alternatives or a specific range of alternatives to be included in an EA. An EA may limit the range of alternatives to the proposed action and no-action when there are no unresolved conflicts concerning alternative uses of available resources. Alternatives are to be considered to the degree commensurate with the nature of the proposed action and agency experience with the environmental issues involved.”

In addition to reasonable alternatives, the EA should also discuss the anticipated effects if “no-action” is taken. Finally, the EA should clearly identify the “preferred alternative” and provide sufficient details as to why other alternatives were eliminated. As such, alternatives that have been considered as a part of this EA process are described in detail in the following paragraphs.

### 3.1 Alternatives Considered

A Runway Justification Study for the Lanett Municipal Airport was completed in 2009 demonstrating the need for a longer runway to support the aviation demand in the Lanett area. The FAA responded to the study in a letter dated January 4, 2010 with a determination that a runway length of 5,400 feet was justified. An Environmental Assessment evaluating a proposed runway reorientation and extension was completed in 2012. The Lanett Regional Airport Layout Plan (ALP), was updated in 2020 to reflect the reoriented/extended runway as well as future infrastructure. Construction of a new terminal building was completed in 2021 and construction of the new reoriented and extended runway was completed in 2022. These recent improvement projects at the airport make it a more desirable airport, thus increasing the number of airport users. In order to safely accommodate airport traffic, a new airport entrance route is being proposed. Additionally, the new reoriented runway has introduced obstructions into the Runway 24 end approaches which need to be removed.

Four potential project alternatives, including the “no-action” option, were evaluated. Those alternatives include:

- Alternative 1: No-Action Alternative: The existing entrance road continues to be utilized for all airport traffic.
- Alternative 2: Construct a new entrance road extending from the terminated industrial access road off of 45<sup>th</sup> Street SW. The main entrance road would then follow 46<sup>th</sup> Street SW before turning west and then southwest, ending at the new terminal. The road spur would extend southwest, paralleling Interstate 85. This main entrance alignment only utilizes a portion of 46<sup>th</sup> Street SW prior to extending west. This Alternative would also include land acquisition and removal of obstructions within several parcels.

- Alternative 3: Construct a new entrance road extending from the terminated industrial access road off of 45<sup>th</sup> Street SW. The main entrance road would then follow 46<sup>th</sup> Street SW before turning west and then southwest, ending at the new terminal. The road spur would extend southwest, paralleling Interstate 85. The main entrance alignment would vary slightly from the alignment of Alternative 2. This alternative utilizes the full length of 46<sup>th</sup> Street SW before extending west. This Alternative would also include land acquisition and removal of obstructions within several parcels.
- Alternative 4: Construct a new entrance road beginning at the intersection of Phillips Road and 45<sup>th</sup> Street SW and extending southwest to the airport terminal. This alternative would not utilize 46<sup>th</sup> Street SW. The road spur would extend southeast and terminate just west of Interstate 85. This Alternative would also include land acquisition and removal of obstructions within several parcels.

Each of the three alternatives were evaluated with respect to six criteria: **1) Does it provide an entrance route that avoids sensitive areas such as school zones, rail road crossings, and residential housing; 2) Does it provide access to the proposed future development areas near I-85, 3) Does it remove newly introduced obstructions at the airport, 4) Does it minimize wildlife hazards at the airport, 5) Potential social and environmental impacts; and 6) Construction costs.** The alternative evaluation is summarized in the following sections.

### 3.2 Alternative 1: No-Action

Alternative 1: “No-Action” alternative would result in the maintaining of the status quo. The existing entrance road would continue to be utilized. The newly introduced obstructions on the Runway 24 end would remain and perimeter fencing would not be installed. **Figure 2.0** shows the current conditions at the airport as well as the current vehicular route to the airport.

#### **Meeting Criteria**

The “No-Action” Alternative **does not meet** the following criteria.

**1. Provide an entrance route that avoids sensitive areas**

The current entrance road is located through a school zone for Huguley Elementary School, a significant intersection at South Phillips Road and Cusseta Road, a rail crossing, and residential neighborhoods.

**2. Provide access to future development to the east of the runway**

There is currently no vehicular access to the proposed non-aeronautical development area.

**3. Remove obstructions at the Runway 24 end**

The recent runway reorientation and extension project has introduced new obstructions within the Runway 24 approaches. The No-Action alternative does not address the need for removal of obstructions; therefore, this alternative would not allow the airport to fulfill obligations required by the previously mentioned grant assurances.

**4. Minimize wildlife hazards at the airport**

The airport does not currently have a perimeter fence and is surrounded by forested areas which provide abundant wildlife habitat within close proximity to the runway. No actions would be taken to reduce the existing wildlife hazards.

**Potential Social or Environmental Impacts**

Since the “No-Action” alternative does not include any of the proposed project activities, there are no potential environmental impacts. This alternative would not require the closure or relocation of any roads or relocation of any homes or businesses. There are no other potential environmental or social impacts as a result of implementing the “No-Action” alternative.

**Construction Costs**

The “No-Action” alternative would result in no construction or wetland/stream mitigation costs.

In summary, the selection of the “No-Action” alternative would result in no costs and would have no social or environmental impacts to the surrounding communities or environment. However, keeping the entrance road in its current location would not provide a safer environment for airport users nor the community. Additionally, the ‘No-Action’ alternative would not address the need for obstruction and wildlife hazard removal at the airport.

**3.3 Alternative 2**

Alternative 2: Construct a new entrance road extending from the terminated industrial access road off of 45<sup>th</sup> Street SW. The main entrance road would then follow 46<sup>th</sup> Street SW before turning west and then southwest, ending at the new terminal. This main entrance alignment only utilizes approximately 950 linear feet of 46<sup>th</sup> Street SW prior to extending west. The road spur would extend southwest, paralleling Interstate 85. This alternative would require the purchase of approximately 37 acres of property to allow for the construction of the new road and the removal of obstructions within the Runway 24 approach. A perimeter fence would be installed along the interior of the newly constructed roadway. All forested areas within the perimeter fence would be cleared in order to minimize wildlife habitat within the fence. **Figure 3.0** shows the Alternative 2 road alignment as well as the proposed property purchase and perimeter fencing.

**Meeting Criteria**

Alternative 2 **would meet** the following criteria:

**1. Provide an entrance route that avoids sensitive areas**

The Alternative 2 road alignment would avoid sensitive community areas. The road would be constructed on parcels currently containing two (2) residential houses and one (1) business; however, these entities, as well as one (1) additional residence and one (1) church, would be relocated as part of the proposed project. The remainder of the road would be constructed through forested areas adjacent to the existing airport property.

**2. Provide access to future development to the east of the runway**

The Alternative 2 alignment includes a road spur for future development.

**3. Remove obstructions at the Runway 24 end**

This alternative includes the acquisition of various parcels (Parcel 23, 24, and 25) within the Runway 24 approach as well as the removal of obstructions (trees and structures) within the parcels.

**4. Minimize wildlife hazards at the airport**

This alternative includes the installation of perimeter fencing along the interior of the proposed roadway and the clearing of all forested areas within the fence. This alternative would also include draining of the ponds located within the project area. This would minimize the amount of open water habitat near the airport.

**Potential Social or Environmental Impacts**

Alternative 2 would require the acquisition of several parcels within the Runway 24 approach as well as property along the proposed road corridor. The required acquisition for this alternative is shown as red shaded areas in **Figure 3.0**. This alternative would also require the relocation of three (3) residential houses, one (1) business, and one (1) church. Relocation assistance would be provided.

Environmentally, the project would require the development of undeveloped areas into the new entrance road as well as clearing of forested areas for obstruction removal and wildlife habitat removal. All forested areas within Parcels 23, 24, and 25 would be cleared as well as all of the forested areas within the proposed perimeter fencing. Any wetlands within the areas proposed for clearing would be cleared and maintained as emergent wetlands. The tree stumps within the wetlands would not be removed during clearing activities. This alternative would require the permanent impact of  $\pm 2.25$  acres of wetlands and 471 linear feet of intermittent stream. Additionally,  $\pm 12.42$  acres of wetlands would be converted from forested wetlands to emergent wetlands. Approximately 0.25 acres of pond would be filled for the construction of the new road and  $\pm 2.32$  acres of pond would be drained in order to reduce the amount of open water habitat within the Runway 24 approach.

**Construction Costs**

The cost to construct Alternative 2 is estimated at \$6,136,250. The estimate includes projected costs for construction, land acquisition and relocation assistance, land clearing, and wetland/stream mitigation costs.

**3.4 Alternative 3: Preferred Alternative**

Alternative 3: “the preferred alternative” - Construct a new entrance road extending from the terminated industrial access road off of 45<sup>th</sup> Street SW. The main entrance road would then follow 46<sup>th</sup> Street SW before turning west and then southwest, ending at the new terminal. This main entrance alignment would vary slightly from the alignment of Alternative 2. This alternative utilizes the full length of 46<sup>th</sup> Street SW before extending west. The road spur would extend southwest, paralleling Interstate 85. This alternative would also require the purchase of approximately 37 acres of property to allow for the construction of the new road and the removal of obstructions within the Runway 24 approach. A perimeter fence would be installed along the interior of the newly constructed roadway. All forested areas within the perimeter fence would be cleared in order to

minimize wildlife habitat within the fence. **Figure 4.0** shows the Alternative 3 road alignment as well as the proposed property purchase and perimeter fencing.

### **Meeting Criteria**

Alternative 3 **would meet** the following criteria:

**1. Provide an entrance route that avoids sensitive areas**

The Alternative 3 road alignment would avoid sensitive community areas. The road would be constructed on parcels currently containing one (1) residential home, and one (1) church; however, these entities, as well as two (2) additional residences and one (1) business, would be relocated as part of the proposed project. The remainder of the road would be constructed through forested areas adjacent to the existing airport property.

**2. Provide access to future development to the east of the runway**

The alternative 3 alignment includes a road spur for future development.

**3. Remove obstructions at the Runway 24 end**

This alternative includes the acquisition of various parcels (Parcel 23, 24, and 25) within the Runway 24 approach as well as the removal of obstructions (trees and structures) within the parcels.

**4. Minimize wildlife hazards at the airport**

This alternative includes the installation of perimeter fencing along the interior of the proposed roadway and the clearing of all forested areas within the fence. This alternative would also include draining the ponds located within the project area. This would minimize the amount of open water habitat near the airport.

### **Potential Social or Environmental Impacts**

Similar to Alternative 2, this alternative would require the acquisition of several parcels within the Runway 24 approach as well as property along the proposed road corridor. The required acquisition for this alternative is shown as red shaded areas in **Figure 4.0**. This alternative would also require the relocation of three (3) residential houses, one (1) business, and one (1) church. Relocation assistance would be provided.

Environmentally, the project would require the development of undeveloped areas into the new entrance road, as well as clearing of forested areas for obstruction removal and wildlife habitat removal. All forested areas within Parcels 23, 24, and 25 would be cleared, as well as all of the forested areas within the proposed perimeter fencing. Any wetlands within the areas proposed for clearing would be cleared and maintained as emergent wetlands. The tree stumps within the wetlands would not be removed during clearing activities. This alternative would require the permanent impact of ±2.25 acres of wetlands and 360 linear feet of intermittent stream. Additionally, ±12.17 acres of wetlands would be permanently converted from forested wetlands to emergent wetlands. Approximately 0.25 acres of pond would be filled for the construction of the new road and ±2.32 acres of pond would be drained in order to reduce the amount of open water habitat within the Runway 24 approach.

### **Construction Costs**

The cost to construct Alternative 3 is estimated at \$5,943,250. The estimate includes projected costs for construction, land acquisition and relocation assistance, land clearing, and wetland/stream mitigation costs.

### 3.5 Alternative 4

Alternative 4: Construct a new entrance road beginning at the intersection of Phillips Road and 45<sup>th</sup> Street SW and extending southwest to the airport terminal. This alternative would not utilize 46<sup>th</sup> Street SW. The road spur would extend southeast and then west to parallel Interstate 85. This alternative would require the purchase of approximately 56 acres of property to allow for the construction of the new road and the removal of obstructions within the Runway 24 approach. Similar to previous alternatives, a perimeter fence would be installed along the interior of the newly constructed roadway. All forested areas within the perimeter fence would be cleared in order to minimize wildlife habitat. **Figure 5.0** shows the Alternative 4 road alignment as well as the proposed property purchase, and perimeter fencing.

#### Meeting Criteria

Alternative 4 **would meet** the following criteria:

**1. Provide an entrance route that avoids sensitive areas**

The Alternative 4 road alignment would avoid all sensitive community areas previously described. The main entrance road would be constructed through forested areas adjacent to the existing airport property. The road spur would be constructed on property containing forested areas as well as property containing one (1) church and one (1) residential home. These entities, as well as two (2) additional residences and one (1) business would be relocated as part of the proposed project.

**2. Provide access to future development to the east of the runway**

The Alternative 4 alignment includes a road spur for future development.

**3. Remove obstructions at the Runway 24 end**

This alternative includes the acquisition of various parcels (Parcel 23, 24, and 25) within the Runway 24 approach as well as the removal of obstructions (trees and structures) within the parcels.

**4. Minimize wildlife hazards at the airport**

This alternative includes the installation of perimeter fencing along the interior of the proposed roadway and the clearing of all forested areas within the fence. This alternative would also include draining of the ponds located within the PSA. This would minimize the amount of open water habitat near the airport.

#### Potential Social or Environmental Impacts

Alternative 4 would require the acquisition of several parcels within the Runway 24 approach as well as property along the proposed road corridor. The required acquisition for this alternative is shown as red shaded areas in **Figure 5.0**. This alternative would also require the relocation of three (3) residential houses, one (1) business, and one (1) church. Relocation assistance would be provided.

Environmentally, the project would require the development of undeveloped areas into the new entrance road as well as clearing of forested areas for obstruction removal and wildlife habitat removal. All forested areas within Parcels 23, 24, and 25 would be cleared as well as all of the forested areas within the proposed perimeter fencing. Any wetlands within the areas proposed for clearing would be cleared and maintained as emergent wetlands. The tree stumps within the wetlands would not be removed during clearing activities. This alternative would require the permanent impact of ±2.00 acres of wetlands, 135 linear feet of intermittent stream, and 331 linear feet of perennial stream. Additionally, ±14.00 acres of wetlands would be permanently



converted from forested wetlands to emergent wetlands. Approximately 0.28 acres of pond would be filled for the construction of the new road and ± 2.29 acres of pond would be drained in order to reduce the amount of open water habitat within the Runway 24 approach.

**Construction Costs**

The cost to construct Alternative 4 is estimated at \$7,741,250. The estimate includes projected costs for construction, land acquisition and relocation assistance, land clearing, and wetland/stream mitigation costs.

**3.6 Preferred Alternative Selection**

In summary, Alternative 2, 3, and 4 would meet all of the project criteria. However, Alternative 4 would require the purchase of ± 19 more acres of property as opposed to Alternative 2 or 3. The Alternative 4 perimeter fence would also encompass more undeveloped area which requires more initial clearing and more long-term maintenance in order to reduce wildlife hazards. Additionally, Alternative 2 and 4 have more wetland and stream impacts than Alternative 3. Alternative 3 offers the lowest estimated project costs due to utilization of the entire existing roadbed of 46<sup>th</sup> Street SW and less mitigation costs for wetland and stream impacts. For these reasons, Alternative 3 was selected as the preferred alternative for the entrance road and improvements project at the Lanett Regional Airport. **Table 3.0** below briefly summarizes the project criteria evaluated for each alternative.

<b>TABLE 3.6: SUMMARY OF PROJECT CRITERIA EVALUATION</b>				
<b>Project Criteria</b>	<b>Alternative 1 (No-Action)</b>	<b>Alternative 2</b>	<b>Alternative 3 (Preferred)</b>	<b>Alternative 4</b>
Provide an entrance route that avoids sensitive areas	X	Yes	Yes	Yes
Provide access to future non-aeronautical development area	X	Yes	Yes	Yes
Remove obstructions at the Runway 24 end	X	Yes	Yes	Yes
Minimize wildlife hazards	X	Yes	Yes	Partially
Potential Social Impacts	None	Relocations required.	Relocations required.	Relocations required.
Potential Environmental Impacts	None	14.67 Ac W 471 Lf IS 2.57 Ac P	14.42 Ac W 360 Lf IS 2.57 Ac P	16.00 Ac W 135 Lf IS 331 Lf PS 2.57 Ac P
<b>Construction Costs</b>				
Main Entrance Road	None	\$5,274,750	\$5,312,050	\$4,286,700
Road Spur	None	\$861,500.00	\$631,200	\$3,454,550
<b>Total</b>	None	<b>\$6,136,250</b>	<b>\$5,943,250</b>	<b>\$7,741,250</b>

W: Wetland, IS: Intermittent Stream, PS: Perennial Stream, P: Pond



REF. SHEET: ESRI WORLD IMAGERY  
DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

**Lanett Regional Airport  
Entrance Road and Improvements Project**  
Lanett, Chambers County, Alabama

**Figure 2.0**

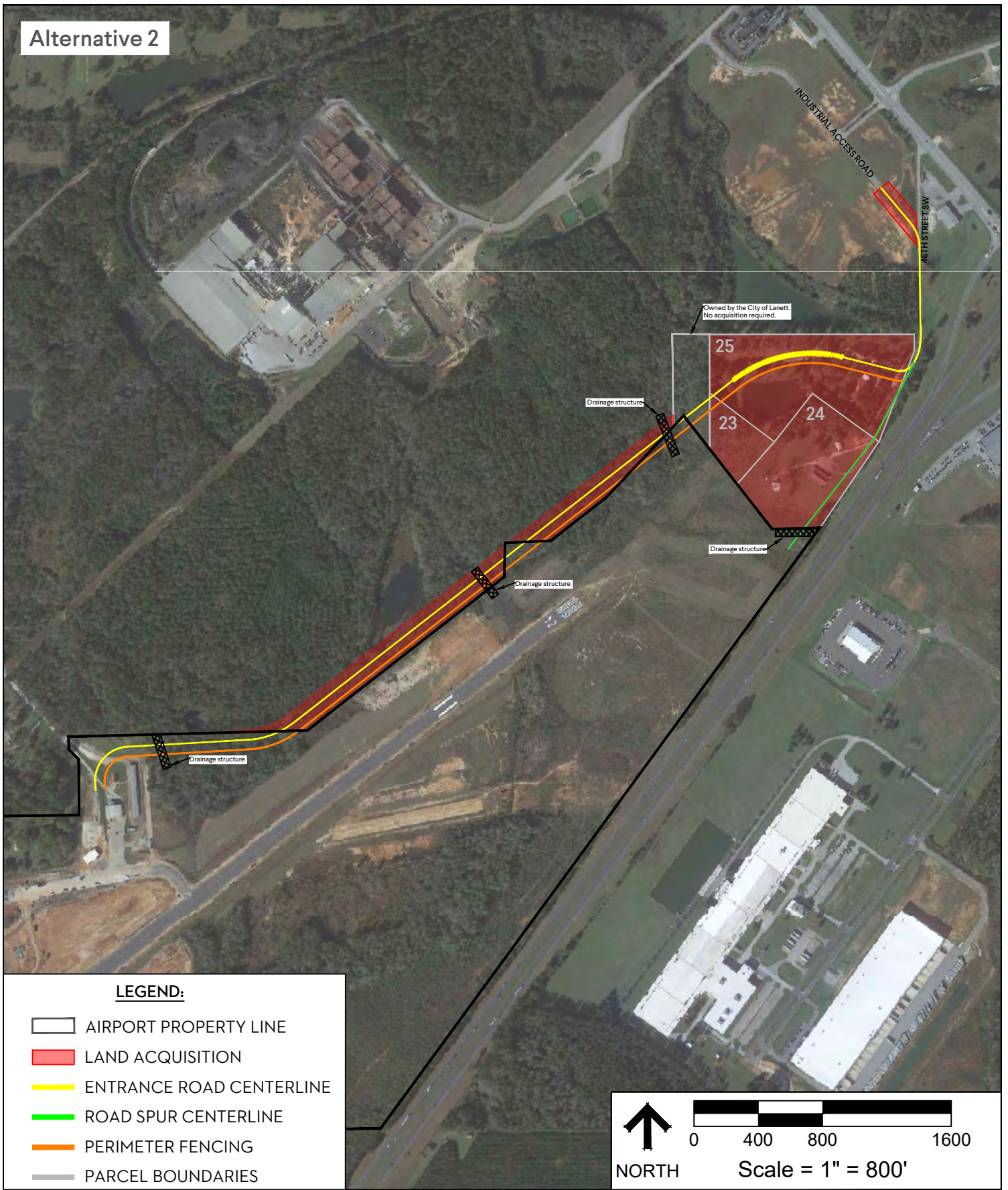
ALT 1: NO ACTION  
GMC # EMGM21A010  
DATE: 08.14.23  
DRAWN BY: AYH

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Alternative 2



**LEGEND:**

-  AIRPORT PROPERTY LINE
-  LAND ACQUISITION
-  ENTRANCE ROAD CENTERLINE
-  ROAD SPUR CENTERLINE
-  PERIMETER FENCING
-  PARCEL BOUNDARIES



REF. SHEET: ESRI WORLD IMAGERY  
DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

**Lanett Regional Airport  
Entrance Road and Improvements Project**  
Lanett, Chambers County, Alabama

**Figure 3.0**

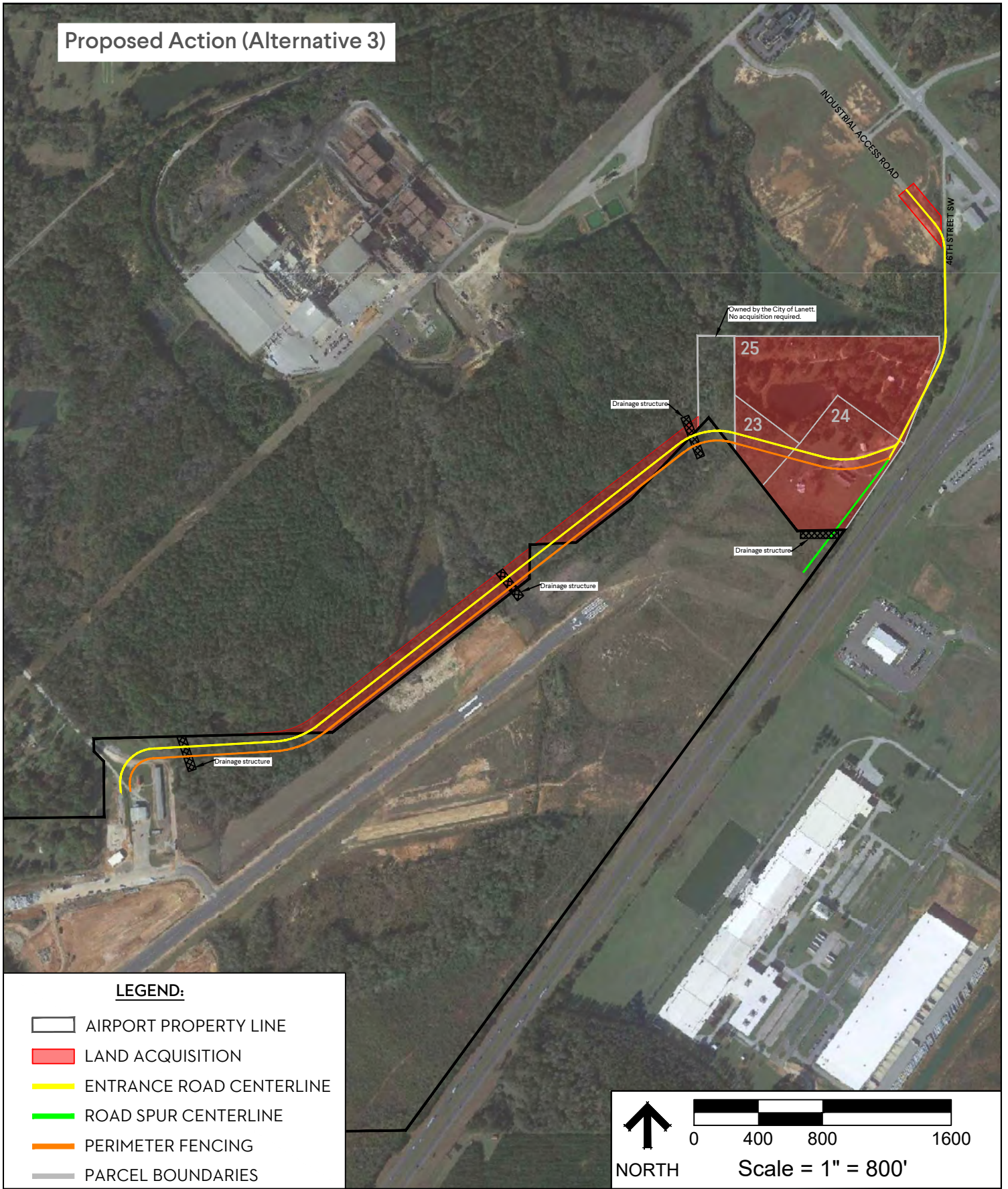
ALTERNATIVE 2  
GMC # EMGM21A010  
DATE: 08.14.23  
DRAWN BY: AYH

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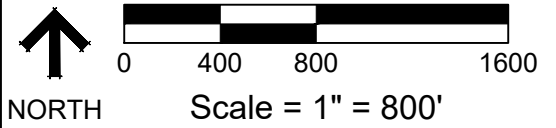


Proposed Action (Alternative 3)



**LEGEND:**

-  AIRPORT PROPERTY LINE
-  LAND ACQUISITION
-  ENTRANCE ROAD CENTERLINE
-  ROAD SPUR CENTERLINE
-  PERIMETER FENCING
-  PARCEL BOUNDARIES



REF. SHEET: ESRI WORLD IMAGERY  
DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

**Lanett Regional Airport  
Entrance Road and Improvements Project**  
Lanett, Chambers County, Alabama

**Figure 4.0**

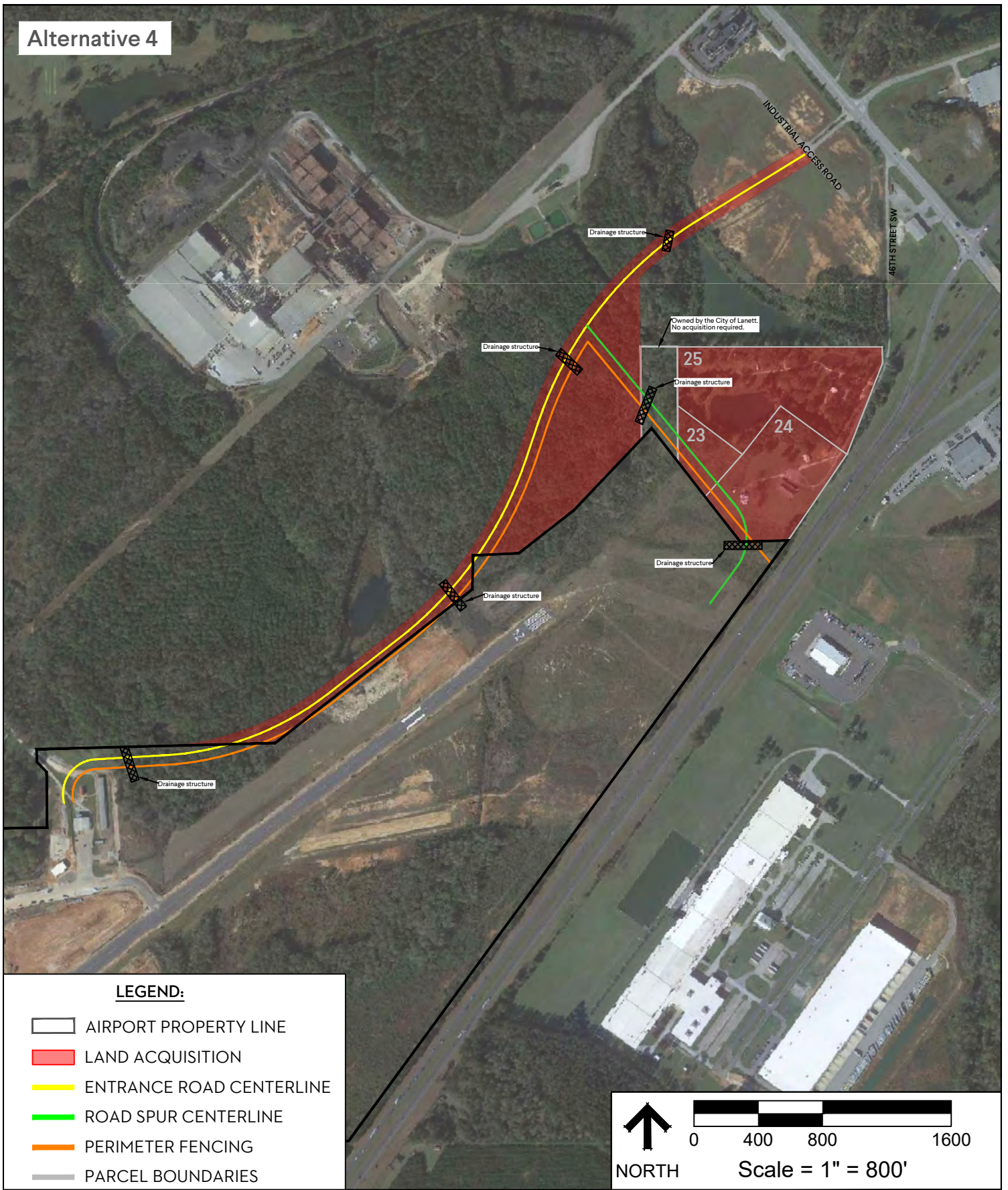
ALTERNATIVE 3: PREFERRED  
GMC # EMGM21A010  
DATE: 08.14.23  
DRAWN BY: AYH

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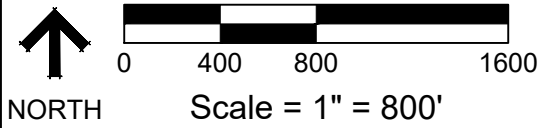


Alternative 4



**LEGEND:**

-  AIRPORT PROPERTY LINE
-  LAND ACQUISITION
-  ENTRANCE ROAD CENTERLINE
-  ROAD SPUR CENTERLINE
-  PERIMETER FENCING
-  PARCEL BOUNDARIES



REF. SHEET: ESRI WORLD IMAGERY  
DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

**Lanett Regional Airport  
Entrance Road and Improvements Project**  
Lanett, Chambers County, Alabama

**Figure 5.0**

ALTERNATIVE 4  
GMC # EMGM21A010  
DATE: 08.14.23  
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## CHAPTER 4      AFFECTED ENVIRONMENT

The purpose of this chapter is to “succinctly describe the environmental conditions of the potentially affected geographical area” of the proposed action and alternatives, as stated within FAA Order 1050.1F.

FAA Order 1050.1F provides fourteen (14) environmental resource categories to be assessed and, where established, provides for each an appraisal threshold for potential impacts. Construction and secondary (induced) impacts that may be generated are addressed within each. The categories for assessment are:

- Air Quality
- Biological Resources
- Climate
- Coastal Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historical, Architectural, Archeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, Environmental Justice, and Children’s Environmental Health and Safety Risks
- Visual Effects
- Water Resources

The February 2020 FAA 1050.1F, “2020 Desk Reference”<sup>2</sup> also gives details on the type and scale of analysis to be performed for each suspected impact category. The 2020 Desk Reference is intended to be used as a supplement to FAA Order 1050.1F. These reference materials were applied in describing the affected environment and the possible impacts that may be generated by implementation of the Proposed Action. From this guidance, eight (8) environmental resource categories were identified as being present within the geographical area of the Proposed Action and reasonable alternatives; therefore, being suspected for possible impacts. These categories are further addressed in the following subchapters.

### 4.1      General Project Setting

The Lanett Regional Airport (7A3) is a public use airport that opened in 1959 and is owned and operated by the City of Lanett. The airport is included in the National Plan of Integrated Airport Systems (NPIAS) as a basic general aviation airport located in Lanett, Chambers County, Alabama (**Figure 6.0 General Location Map**). The Airport property is directly surrounded by forested areas, rural residential, commercial, and industrial properties. Interstate 85 is located adjacent to the airport to the southeast. The airport and associated project area is approximately 600 – 660 feet above sea level (ASL) and is situated within the Piedmont Upland Section of the Piedmont Physiographic Province of Alabama. The airport is further described as being located within the Southern Piedmont Upland District of the Piedmont Upland Section. The Southern Piedmont District is characterized by a rolling topography indicative of a dissected peneplain of advanced erosional

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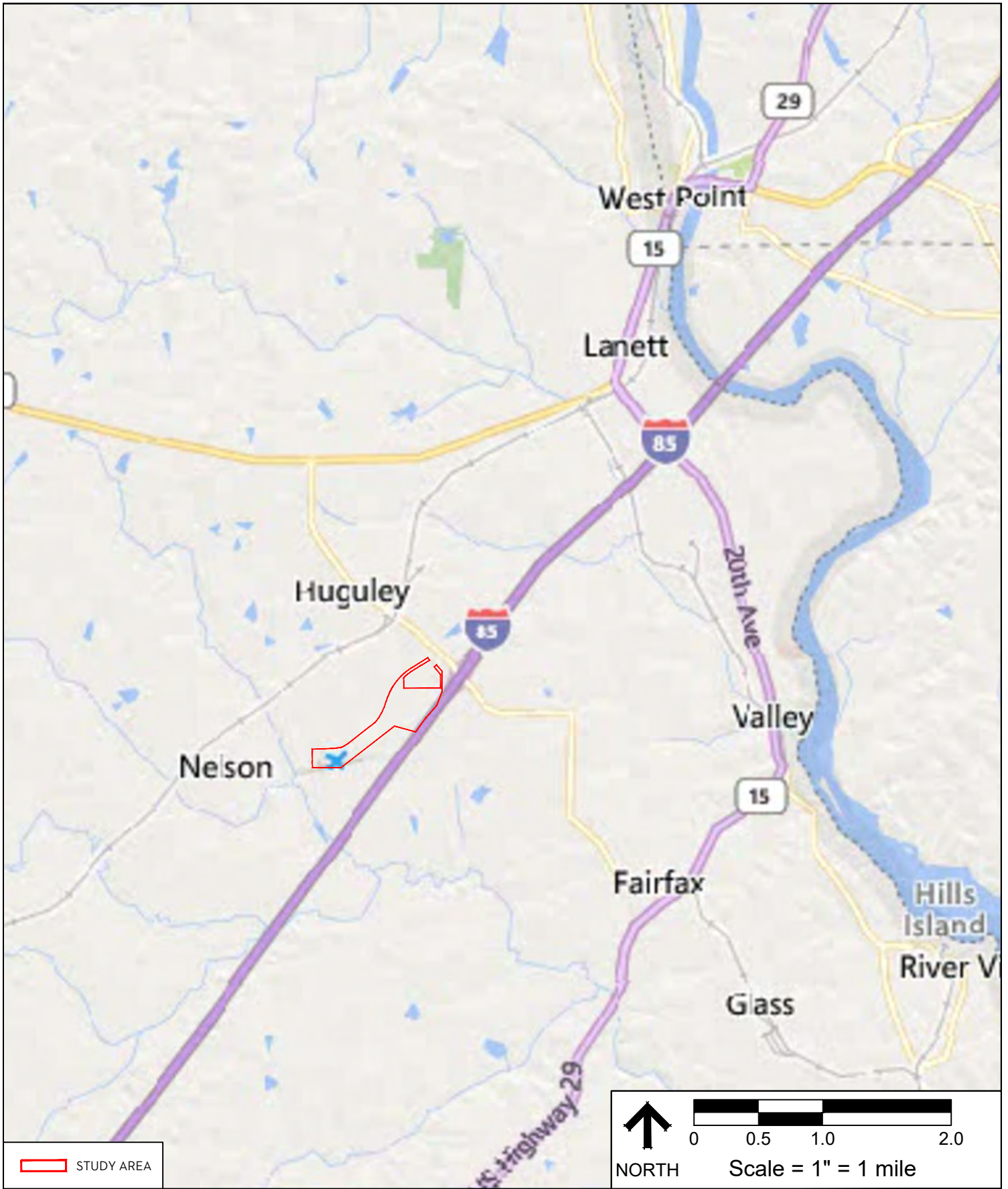
<sup>2</sup> [https://www.faa.gov/sites/faa.gov/files/about/office\\_org/headquarters\\_offices/apl/desk-ref.pdf](https://www.faa.gov/sites/faa.gov/files/about/office_org/headquarters_offices/apl/desk-ref.pdf)



maturity. Surface water runoff general flows south to Osanippa Creek which is located within the Middle Chattahoochee-Lake Harding Watershed (HUC 03130002) (**Figure 7.0 USGS Quadrangle Map**).

For the purpose of this EA, only one study area has been defined. The primary study area (PSA) consists of approximately 138 acres of land located within and adjacent to the current airport property boundary. The proposed action would call for the construction of a new entrance road at the Lanett Regional Airport as well as parcel acquisition and obstruction removal for the Runway 24 end of the newly orientated runway. The PSA is the area determined to potentially experience direct physical disturbance during the construction and operation of the proposed action and reasonable alternatives. The PSA is shown on an aerial image in **Figure 8.0**.

The area to be directly impacted by implementation of the proposed project (PSA) consists of densely and sparsely forested areas as well as cleared areas. The cleared and sparsely forested areas are associated with parcels located to the north of the Runway 24 end RPZ and contain rural residential housing, an automotive shop, and the Faith Temple Family Worship church. The densely forested areas are located west of the runway within the proposed main entrance road right-of-way. The forested areas consist of a mixed hardwood and pine canopy. The PSA is not located within a floodplain and does not have any archeological sites located within the direct project area.



REF. SHEET: ESRI WORLD STREETS  
 DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

### Figure 6.0

GENERAL LOCATION MAP  
 GMC # EMGM21A010  
 DATE: 08.14.23  
 DRAWN BY: AYH

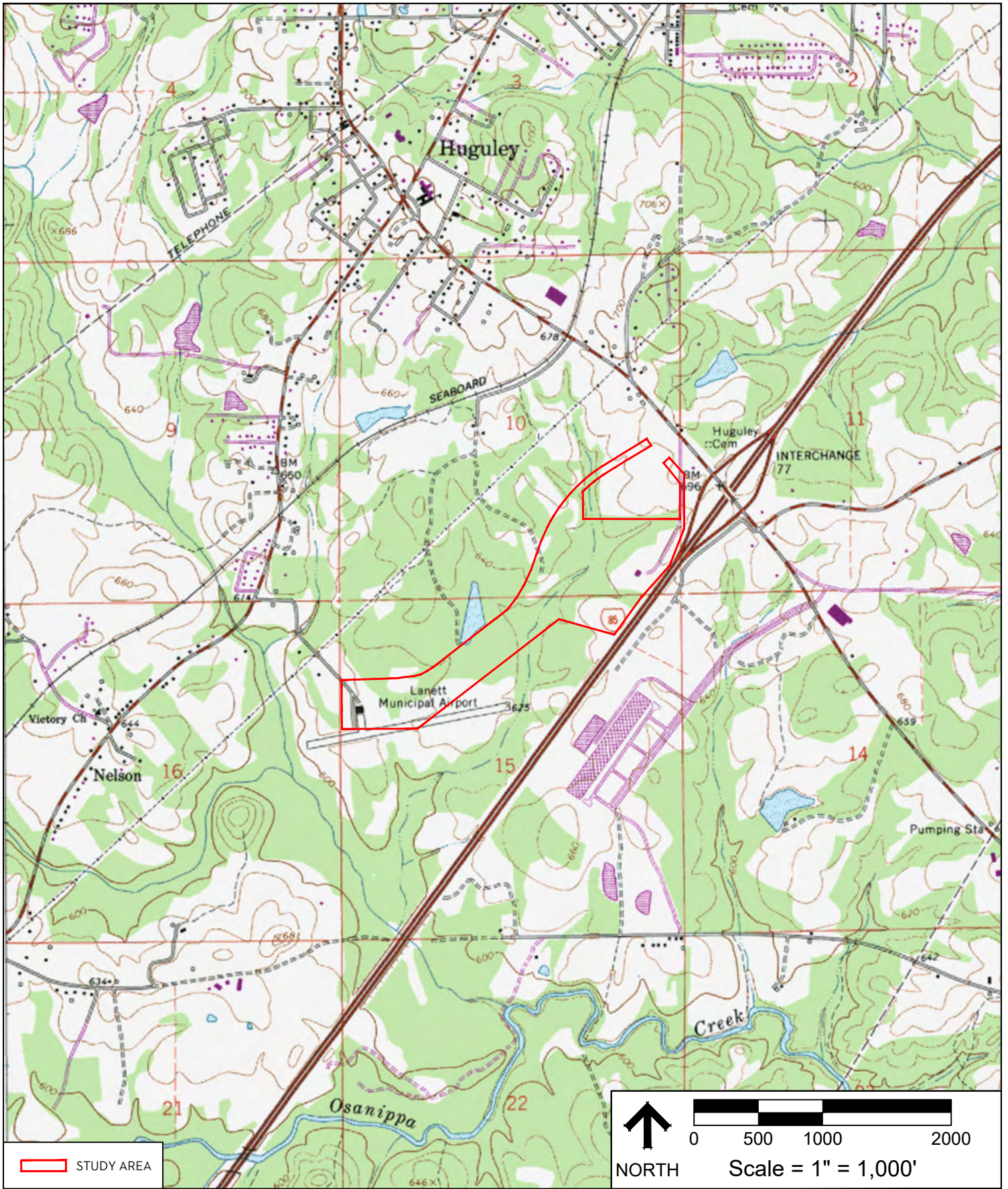
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## Lanett Regional Airport Entrance Road and Improvements Project

Lanett, Chambers County, Alabama





REF. SHEET: LANETT SOUTH, ALABAMA QUADRANGLE MAP  
 DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

**Lanett Municipal Airport  
 Entrance Road and Improvements Project**  
 Lanett, Chambers County, Alabama

**Figure 7.0**

USGS QUADRANGLE MAP  
 GMC # EMGM21A010  
 DATE: 08.14.23  
 DRAWN BY: AYH

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REF. SHEET: ESRI WORLD IMAGERY  
 DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

**Lanett Regional Airport  
 Entrance Road and Improvements Project**  
 Lanett, Chambers County, Alabama

**Figure 8.0**

PRIMARY STUDY AREA  
 GMC # EMGM21A010  
 DATE: 08.14.23  
 DRAWN BY: AYH

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## 4.2 Non-Applicable Environmental Impact Categories

Per FAA Order 1050.1F, “if an environmental impact category is not relevant to the proposed action or any of the reasonable alternatives identified (i.e., the resources included in the category are not present or the category is not otherwise applicable to the proposed action and alternative[s]), this should be briefly noted and no further analysis is required.” Therefore, the following is a list of resources that the No-Action and/or the Proposed Action would not affect as they are not present within or near to the study area:

### 4.2.1 Air Quality

Under the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) developed the National Ambient Air Quality Standards (NAAQS) for six (6) air pollutants. These six criteria pollutants include carbon dioxide (CO<sub>2</sub>), nitrogen dioxide, ozone, particulate matter, sulfur dioxide, and lead. The proposed PSA is not located in an area classified as a “non-attainment” area for any of the six (6) criteria pollutants regulated under the Clean Air Act. Additionally, it is anticipated that the proposed project and alternatives would have a minimal overall impact on air quality since a significant increase in airport operations is not anticipated as a result of the implementation of the proposed action. Therefore, air quality is not relevant to this assessment.

### 4.2.2 Climate

Climate change, according to the U.S. EPA, “refers to any significant change in the measures of climate lasting for an extended period of time.” This change is a result of greenhouse gases (GHG), which include pollutants such as CO<sub>2</sub>, methane, nitrous oxide, and refrigerants that trap heat and radiation in the earth’s atmosphere. The burning of fossil fuels also contributes significantly to GHG emissions. Per FAA data<sup>3</sup>, aircraft engine emissions are roughly composed of about 70% CO<sub>2</sub>, making it the main GHG pollutant produced by the combustion of aviation (fossil) fuel. The Intergovernmental Panel on Climate Change (IPCC) reported that international and domestic aviation accounts for approximately 4.1% of global transportation GHG emissions. The EPA estimates that, in 2013, commercial aviation was responsible for more than 6.5% of CO<sub>2</sub> emissions across the nation (FAA Desk Reference, 2020). Therefore, minimizing GHG emissions, as well as identifying potential future impacts a Proposed Action may potentially cause to climatic conditions is necessary. It is anticipated that the proposed project would have a minimal overall impact on GHGs and climate change since a significant increase in airport operations is not anticipated as a result of the proposed action. The CEQ has noted “it is not currently useful for the NEPA analysis to attempt to link specific climatological changes, or the environmental impacts thereof, to the particular project or emissions, as such direct linkage is difficult to isolate and to understand.”<sup>4</sup> There are no significance thresholds for aviation GHG emissions since there are currently no accepted methods of determining significance applicable to aviation projects given the small percentage of emissions they contribute. Therefore, no significant direct, indirect, or cumulative effects are anticipated due to the implementation of the proposed action or alternatives.

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<sup>3</sup> [https://www.faa.gov/regulations\\_policies/policy\\_guidance/envir\\_policy/media/aeprimer.pdf](https://www.faa.gov/regulations_policies/policy_guidance/envir_policy/media/aeprimer.pdf)

<sup>4</sup> [https://ceq.doe.gov/guidance/ceq\\_guidance\\_nepa-ghg.html](https://ceq.doe.gov/guidance/ceq_guidance_nepa-ghg.html)

### **4.2.3 Coastal Resources**

Chambers County is not located within the Coastal Barrier Resource System as defined by the Department of the Interior (DOI) under the Coastal Barrier Resources Act of 1982. Similarly, the Coastal Zone Management Act of 1972, as administered by the National Oceanic and Atmospheric Administration (NOAA), and the NOAA National Marine Sanctuaries Act, are not applicable to the water resources of Chambers County, Alabama. Therefore, coastal resources are not relevant to this assessment.

### **4.2.4 Department of Transportation Act, Section 4(f)**

Section 4(f) properties include parks and recreational areas, wildlife and waterfowl refuges, and historic sites of national, state, or local significance that are both publicly owned and open to the public. A property must be a significant resource for Section 4(f) to apply. It protects only those historic or archeological properties that are listed (or eligible) on the National Register of Historic Places (NRHP), except in unusual circumstances. Historic sites are normally identified during the process required under Section 106 of the National Historic Preservation Act (NHPA). Any part of a Section 4(f) property is presumed to be applicable unless there is a statement of insignificance relative to the entire property by the office having jurisdiction over the property. There are no 4(f) properties located within or in close proximity to the PSA. Additionally, a Cultural Resource Assessment (CRA) was completed for the PSA, dated August 4, 2023, and no archeological sites nor historic properties eligible for the NRHP were located within the PSA. Therefore, the proposed action and alternatives will not affect 4(f) properties.

### **4.2.5 Natural Resources and Energy Supply**

This impact category evaluates the consumption of natural resources and use of energy supplies that may result from the Proposed Action and alternatives. Natural resources can include water, asphalt, aggregate, wood, and other raw materials. Energy supplies include coal, natural gas, and other fossil fuels. The assessment herein includes consideration for all phases of the Proposed Action including construction, regular use, and maintenance. The Proposed Action and alternatives are anticipated to use common construction materials that are in regular supply within Chambers County. These include natural resource materials, and commodity materials, that are typical in construction of roadways such as clay, concrete, gravel, and asphalt. Vehicle fuels to power routine construction equipment during the construction phase of the project would also be needed. Sources for such fuel are available in Lanett. The evaluated alternatives would not require the use of scarce or unusual materials or natural resources and only a temporary increase in energy supply, primarily fuel consumption during construction, would occur. It is not anticipated that this temporary increase in demand during construction would have the potential to cause demand to exceed available or future supplies of this resource. Therefore, the proposed action and alternatives would have minimal direct, indirect, or cumulative impact to natural resources and energy supply.



#### **4.2.6 Noise and Noise-Compatible Land Use**

Defined in the 2020 Desk Reference, “Noise is considered unwanted sound that can disturb routine activities (e.g., sleep, conversation, student learning) and can cause annoyance.” Aviation noise is, typically, the predominant public concern regarding aviation activities. The proposed action and alternatives are not expected to increase air traffic in the area, nor change aircraft types currently using the airport. The project is located within an area surrounded by existing high-volume roadways as well as industrial development. Therefore, no changes in the cumulative noise exposure of individuals in the surrounding areas are expected.

#### **4.3 Suspected Environmental Impact Categories**

The environmental resource categories listed below are, or may be, present within the geographical area of the Proposed Action or any reasonable alternatives. This determination was made after consulting with applicable regulatory agencies and after through investigations of the study areas. These categories, the potential for significant impact, and any required mitigation, are further discussed in the following chapter.

- Biological Resources
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historic, Architectural, and Archeological Resources
- Land Use
- Socioeconomics, Environmental Justice, and Children’s Environmental Health and Safety Risks
- Visual Effects
- Water Resources

## CHAPTER 5 ENVIRONMENTAL CONSEQUENCES & MITIGATION

Based on guidance provided in FAA Order 1050.1F, this section of the EA provides detailed information on the analysis and evaluation of potential environmental impacts associated with the Preferred Alternative compared to the No-Action alternative. It also provides information on the applicable regulatory settings, and the special purpose laws, if any, associated with each impact category. Per FAA Order 1050.1F, data and analyses provided herein are “presented in detail commensurate with the importance of the impact”.

The FAA has established significance thresholds for most, but not all environmental categories, and has identified the thresholds in FAA Order 1050.1F and the associated 2020 Desk Reference. **Table 5.0** provides a summary listing of the suspected environmental impact categories identified in Chapter 4 along with a brief identification of potential impacts beyond FAA significance thresholds (if established). Potential effects from construction impacts and cumulative impacts, as required in the FAA Order 1050.1F, are also included.

**TABLE 5.0: SUMMARY OF POTENTIAL IMPACTS FROM PREFERRED ALTERNATIVE**

<b>Environmental Impact Category</b>	<b>Potential Impact?</b>
Biological Resources	Below significance thresholds
Farmland	No
Hazardous Materials, Solid Waste, and Pollution Prevention	Below significance thresholds
Historic, Architectural, and Archeological Resources	No
Land Use	<b>Yes</b>
Socioeconomics, Environmental Justice, and Children’s Environmental Health and Safety Risks	No
Visual Effects	Below significance thresholds
<b>Water Resources</b>	<b>Yes</b>
Construction	Below significance thresholds
Cumulative Impacts	Below significance thresholds

*Source: GMC Lanett Regional Airport Entrance Road EA Summary Data 2022*

The sections below describe the regulatory setting, significance thresholds (if thresholds have been set), and environmental consequences of each resource that the Preferred Alternative and No-Action alternative may potentially affect. If an alternative evaluated in this section would result in significant environmental impacts, mitigation measures to address such impacts are also discussed. Mitigation measures as defined by 40 CFR include steps to avoid, mitigate, minimize, rectify, reduce, or eliminate the impact associated with a proposed agency action. The objective of mitigation is to control disturbance of the environment, including the individuals, and habitat that live in the environment. As detailed in Chapter 4, resource categories Air Quality; Climate; Coastal Resources; Department of Transportation Act, Section 4(f); Natural Resources and Energy Supply; and Noise and Noise-Compatible Land Use are not relevant to the proposed action and alternatives. No further analyses of these are required and, therefore, are not included in this chapter.

### 5.1 Biological Resources

Biological Resources are described by the 2020 Desk Reference as “being valued for their intrinsic, aesthetic, economic, and recreational qualities.” This impact category includes an assessment of presence or use of the

proposed study area by terrestrial and aquatic plant and animal species. Such species include state or federally-listed threatened and endangered species, species of special concern, migratory birds, game species, and environmentally sensitive and/or critical habitats. Any potential impacts to biological resources that may result from changes to visual effects or negative effects of light emissions should also be discussed in this section.

### **5.1.1 Regulatory Setting**

The FAA 2020 Desk Reference identifies the various statutes, Executive Orders, and other guidance federally adopted in order to protect biological resources. Though many regulations are listed, the ones most applicable to the Proposed Action for this EA include the Bald and Golden Eagle Protection Act (BGEPA), the Endangered Species Act (ESA), and the Migratory Bird Treaty Act (MBTA). The United States Fish and Wildlife Service (USFWS) holds regulatory oversight of these programs on the federal level.

### **5.1.2 Significant Impact Threshold**

Based on guidance outlined in FAA Order 1050.1F, a significant impact would occur if the USFWS determines that the Proposed Action would be likely to jeopardize the existence of federally-listed threatened or endangered species or would result in adverse impacts to federally-designated critical habitat. The FAA has not established a significance threshold for non-listed species. In addition, Exhibit 4-1 of FAA Order 1050.1F provides other factors to consider in evaluating potential for impacts to biotic resources. These include, but are not limited to, extirpation of an unlisted species from a large area, adverse impacts to special status species or their habitats, substantial loss or degradation of native species or their habitats, or adverse impacts to reproductive success / ability to sustain viable species populations.

### **5.1.3 Analysis of Biological Resources**

As the Proposed Action and alternatives include the construction of a roadway on currently undeveloped land, as well as clearing of additional undeveloped land, the project could potentially involve the clearing of critical habitat or habitat that is being utilized by one or more of the biological resources listed above. Therefore, this section discusses the existing vegetation composition, and any federally-listed threatened or endangered species, species of special concern, migratory birds, and state protected species known to occur, or have the potential to utilize, the PSA. **Table 5.1** provides a summary of the thresholds and factors to consider when performing an analysis of impacts to this category, as described in Exhibit 4-1 of the 2020 Desk Reference.

**TABLE 5.1: SUMMARY OF BIOTIC RESOURCE ANALYSIS – FACTORS TO CONSIDER**

FAA Threshold or Factor	Potential Effect by Proposed Action?
<b>Threshold:</b> USFWS determined the action jeopardizes existence of a federally-listed threatened or endangered species or destruction/adverse modification to designated critical habitat	No. Correspondence received from USFWS on August 15, 2023 indicates that no federally-listed species/critical habitat are known to occur in the project area and the proposed project will have no significant impact on fish and wildlife resources.
<b>Factor:</b> A long-term or permanent loss of unlisted plant or wildlife species, i.e., extirpation of the species from a large project area	No. The habitats noted within the PSA are common within the surrounding area. Supporting populations of similar species are also common in the surrounding area.
<b>Factor:</b> Adverse impacts to special status species (e.g., state species of concern, species proposed for listing, migratory birds, bald / golden eagles) or their habitats.	No. The habitats noted within the PSA are common within the surrounding area. Supporting populations of similar species noted within the PSA are also common in the surrounding area.
<b>Factor:</b> Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations	No. The habitats noted within the PSA are common within the surrounding area. Supporting populations of similar species are also common in the surrounding area.
<b>Factor:</b> Adverse impacts on a species' reproductive success rates, natural mortality rates, non-natural mortality (e.g., road kills and hunting), or ability to sustain the minimum population levels required for population maintenance.	No. The habitats noted within the PSA are common within the surrounding area. Supporting populations of similar species noted within the PSA are also common in the surrounding area.

*Source: Significance Thresholds and factors to consider established in FAA Order 1050.1F and FAA 2020 Order 1050.1F Desk Reference*

The USFWS Information for Planning and Consultation (IPaC) database was utilized to generate a list of threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the PSA and/or may be affected by the proposed project. The IPaC generated species list is attached as **Appendix A. Table 5.2** below identifies the listed species that were identified. No critical habitats were identified within the study area.

**TABLE 5.2: USFWS THREATENED AND ENDANGERED SPECIES LIST**

Common Name	Scientific Name	Federal Status
Whooping Crane	<i>Grus americana</i>	Experimental Population
Alligator Snapping Turtle	<i>Cryptobranchus alleganiensis</i>	Proposed Threatened
Monarch Butterfly	<i>Carpoides velifer</i>	Candidate

### *Vegetation*

This subsection will provide a description of vegetation and habitats within the study area that may provide support for terrestrial and aquatic plants and animals. The Proposed Action and alternatives PSA consists of undeveloped areas as well as developed areas. The undeveloped areas consist of a mix of planted pines, bottomland hardwoods, scrub-shrub areas and cleared, open fields. Jurisdictional wetlands, streams, and ponds have been identified with the PSA. The developed areas consist of rural residential, commercial, and institutional (Faith Temple Family Worship church) developments. Approximately 87 percent of the PSA is upland and 13 percent is wetland/waters.

Upland habitats within the study area include portions of the existing airport facility that are dominated by grasses that are regularly mowed as part of airfield management. The areas surrounding the developments within the PSA also contain areas that are dominated by grasses that are regularly mowed. Other upland areas consist of planted pine and hardwood forested areas. Plant species observed within the upland areas include facultative, facultative upland, and upland species that are common for the region. A few of these species include various forage grasses, *rubus* sp., broom sedge (*Andropogon virginicus*), loblolly pine (*Pinus taeda*), American beech (*Fagus grandifolia*), red maple (*Acer rubrum*), and winged elm (*Ulmus alata*).

The wetland habitats noted on site consist of forested, scrub-shrub, and emergent wetlands. Plant species observed within the wetland areas include facultative, facultative wetland, and obligate species that are common for the region. A few of these species include common rush (*Juncus effusus*), black willow (*Salix nigra*), water oak (*Quercus nigra*), hazel alder (*Alnus serrulate*), and green ash (*Fraxinus pennsylvanica*).

No state or federally-listed protected plant species, as described in **Table 5.2**, were documented within, or adjacent to, the study area. Moreover, the PSA does not contain suitable habitat to support potential state or federally-listed plant species known to occur within the surrounding area.

### *Protected Wildlife Species*

Wildlife species of concern that may occur within, or near to, the PSA are identified in **Table 5.2**. There is no evidence that the PSA or surrounding areas of the airport are utilized by any of the federally-listed threatened or endangered wildlife species. Additionally, no environmentally sensitive or critical habitat are located within the PSA.

Certain species of birds that are common at airports and also protected under the Migratory Bird Treaty Act (MBTA), such as American crows (*Corvus branchyrhynchos*), killdeer (*Charadrius vociferus*), mourning doves (*Zenaida macroura*), and eastern meadowlarks (*Sturnella magna*), may occasionally use the grassy areas within the PSA and surrounding airfield for ground foraging. Common terrestrial species, protected as game animals by the State of Alabama, which may occur within the PSA include Virginia opossum, raccoon, white-tailed deer, North American

beaver, coyote, and eastern wild turkey. These are very common species found throughout the surrounding area.

A preliminary scoping letter discussing the project and its potential impacts to biological resources was submitted to the USFWS. The USFWS responded to the initial scoping letter with a stamped-reply stating that no federally -listed species/critical habitat are known to occur in the project area and the proposed project will have no significant impact on fish and wildlife resources. A copy of the stamped-reply letter can be found in **Appendix D**.

*Environmentally Sensitive and Critical Habitats*

There are no federally-listed critical habitat areas designated within the vicinity of the PSA.

**5.1.4 Environmental Consequences of the Alternatives**

*5.1.4a Alternative 1: No-Action*

*Vegetation*

The No-Action alternative would not affect the vegetative communities, and the associated wildlife use of such communities, beyond the existing condition. The PSA would continue to be utilized for its current use. No direct, indirect, or cumulative impacts would result to vegetation as part of the No-Action alternative. No further analysis would be necessary and mitigation efforts would not be required.

*Wildlife*

The No-Action alternative would not affect the wildlife, including protected wildlife species, within the PSA or surrounding area. The area would continue to be utilized for its current use. No direct, indirect, or cumulative impacts would result to wildlife as part of the No-Action alternative. No further analysis would be necessary and mitigation efforts would not be required.

*Environmentally Sensitive and Critical Habitats*

There are no federally-listed or state designated critical habitat areas within the PSA or immediate surrounding areas. No direct, indirect, or cumulative impacts would result to environmentally sensitive and critical habitats as part of the No-Action alternative. No further analysis would be necessary and mitigation efforts would not be required.

*5.1.4b Proposed Action (Alternative 3)*

*Vegetation*

The Proposed Action would convert approximately 8 acres of undeveloped land to impervious surfaces in the form of asphalt associated with the entrance road. This action would also clear the trees across approximately 38 additional acres in order to remove wildlife hazards and obstructions.

This action does not result in a significant effect to vegetation. This determination was made from the analysis of vegetation as the PSA does not support unique or rare vegetative



communities. No federally-listed threatened or endangered plant species occupy the PSA or surrounding area. No significant direct, indirect, or cumulative impacts would result to vegetation with the Preferred Alternative. No further analysis would be necessary and mitigation efforts would not be required.

#### *Wildlife*

This action does not result in a significant effect to wildlife populations. This determination was made from the analysis of wildlife as the PSA does not support suitable or sufficient foraging, breeding, nesting or refugia habitats for any of the federally-listed threatened or endangered wildlife species. Additionally, the species which may occur within the PSA are very common species found throughout the surrounding area. The proposed perimeter fence would be used to discourage or exclude animals from the airfield in efforts to maintain aviation safety and prevent wildlife-aircraft incursions. No significant direct, indirect, or cumulative impacts would result to wildlife with the Preferred Alternative. No further analysis would be necessary and mitigation efforts would not be required.

#### *Environmentally Sensitive and Critical Habitats*

There are no federally-listed or state designated critical habitat areas within the PSA or immediate surrounding areas. No significant direct, indirect, or cumulative impacts would result to environmentally sensitive and critical habitats with the Preferred Alternative. No further analysis is necessary.

## **5.2 Farmland**

### **5.2.1 Regulatory Setting**

Chapter 6 of the 2020 Desk Reference describes farmlands as any agricultural area considered to be prime, unique, or of statewide or local importance. The Farmland Protection Policy Act (FPPA) regulates all federal actions that have the potential to convert farmland to non-agricultural uses, including such farmlands identified in the Desk Reference. The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) acts as the oversight agency for FPPA and has the final authority for designating farmlands.

### **5.2.2 Significant Impact Threshold**

Exhibit 4-1 of FAA Order 1050.1F provides the significance threshold for farmlands as “A significant impact would occur when: The total combined score on Form AD-1006, “Farmland Conversion Impact Rating,” ranges between 200 and 260 points.” Additional factors to consider include situations in which the Proposed Action would potentially convert important farmlands to non-agricultural uses.

### **5.2.3 Analysis of Farmland**

During early coordination for this EA, the USDA-NRCS Web Soil Survey was utilized to identify soil types within the PSA. The PSA includes the following nineteen (19) soil types: AbB3- Appling gravelly sandy clay loam, severely eroded, gently sloping, AbC3- Appling gravelly sandy clay loam, severely

eroded, sloping, AcB– Applying gravelly sandy loam, gently sloping, AcC– Applying gravelly sandy loam, sloping, AcD– Applying gravelly sandy loam, strongly sloping, AdB– Applying sandy loam, 2 to 6 percent slopes, AdC– Applying sandy loam, 6 to 10 percent slopes, CaC3 – Cecil gravelly clay loam, severely eroded, sloping, CbB2– Cecil gravelly sandy loam, eroded, gently sloping, CbC2 – Cecil gravelly sandy loam, eroded, sloping, CgB– Colfax sandy loam, gently sloping, thick surface, CgC– Colfax sandy loam, sloping, thick surface, LaB3– Lloyd clay loam, severely eroded, gently sloping, LaC3– Lloyd clay loam, severely eroded, sloping, LbC3– Lloyd gravelly clay loam, severely eroded, sloping, LeB2– Lloyd sandy loam, eroded, gently sloping, Sa– Sandy alluvial land, poorly to somewhat poorly drained, Sb – Seneca sandy loam, and Sd– Starr soils. The AcB, AdB, CbB2, LeB2, Sb, and Sd soils were identified as prime farmland, per the NRCS database.

None of the soils on site that are classified as prime farmland are currently being utilized as farmland. The project area consists of forested land as well as rural residential, commercial, and institutional (church) developments. A concurrence letter was submitted to the local USDA-NRCS office for their assessment of the project. The USDA-NRCS Resource Soil Scientist responded with a letter dated August 15, 2023 stating that the PSA is located within an area that meets the definition for urban development and is therefore exempt from the Farmland Protection Policy Act (FPPA). A copy of the exemption letter can be found in **Appendix D**.

## **5.2.4 Environmental Consequences of the Alternatives**

### *5.2.4a Alternative 1: No-Action*

The PSA is comprised of and surrounded by parcels designated for and/or currently utilized for airport, industrial, commercial, and residential use. None of the property within or immediately surrounding the PSA is being utilized as farmland. The FPPA does not apply to land that is already committed to “urban development or water storage” which includes the PSA. Therefore, the No-Action alternative would not change this designation and no direct, indirect, or cumulative impacts to farmland would occur. No further analysis would be necessary and mitigation efforts would not be required.

### *5.2.4b Proposed Action (Alternative 3)*

The PSA is comprised mostly of and surrounded by parcels designated for and/or currently utilized for airport, industrial, commercial, and residential use. None of the property within or immediately surrounding the PSA is being utilized as farmland. Additionally, the USDA-NRCS Resource Soil Scientist responded with a letter dated August 15, 2023 stating that the PSA is located within an area that meets the definition for urban development and is therefore exempt from the FPPA. The Preferred Alternative would not change this designation and no significant direct, indirect, or cumulative impacts to farmland would occur. No further analysis would be necessary and mitigation efforts would not be required.

## **5.3 Hazardous Materials, Solid Waste, and Pollution Prevention**

This chapter includes an assessment of any hazardous material(s) that might be used during the construction or operation of a Proposed Action. With respect to solid waste and pollution prevention, the analysis should

identify any anticipated refuse materials that may be discarded on the project site and the ability to avoid, prevent, or reduce pollutant discharges or emissions.

### **5.3.1 Regulatory Setting**

Chapter 7 of the 2020 Desk Reference identifies the EPA as the federal agency tasked with the compliance and enforcement of regulations involving hazardous substances. The following federal statutes (and state equivalents, if applicable) are those that address hazardous materials, solid waste, and pollution prevention as a part of the NEPA process and are applicable to the activities of the Proposed Action.

#### *5.5.1a Comprehensive Environmental Response, Compensation, and Liability Act*

Referred to as “CERCLA”, this Act is directed by the EPA and institutes financial liability for those responsible in hazardous substance releases. In situations where the responsible entity cannot be identified, a trust was established that provides such finances for cleanup. Additionally, this Act establishes the National Priority List 5.9 (NPL), which is a listing of sites with known releases or threatened releases of hazardous substances in the United States and its territories. The NPL is helpful in assessing sites that may require further investigation. The current NPL can be viewed and researched by state at <https://www.epa.gov/superfund/national-priorities-list-npl-sites-state>. Additionally, the EPA hosts another interactive website, [www.epa.gov/cleanups](http://www.epa.gov/cleanups), that provides information on various types of federal programs responsible for the identification and cleanup of land throughout the United States.

#### *5.5.1b Pollution Prevention Act*

This act is regulated by both the Council of Environmental Quality (CEQ) and the EPA and is intended to require pollution prevention and reduction control of source pollutants so that wastes (hazardous and non-hazardous) would have less of an impact on the environment.

#### *5.5.1c Resource Conservation and Recovery Act*

The Resource Conservation and Recovery Act (RCRA) established guidelines for the generation, storage, treatment, and disposal of hazardous waste and non-hazardous solid waste in the United States. Program goals are the protection of human health and the environment, the conservation of energy and natural resources, the reduction of waste volumes and the sustainable, responsible management of waste products. Three different programs within the RCRA are established for the oversight of separate waste types identified as 1) Hazardous wastes; 2) Non-hazardous wastes; and 3) Underground storage tanks (UST). Of these programs, the hazardous wastes and non-hazardous waste programs are most relevant to FAA actions, per the 2020 Desk Reference.

#### *5.5.1d Executive Order 12088, Federal Compliance with Pollution Control Standards*

This Executive Order directs federal agencies to comply with applicable pollution control standards and to consult with the EPA, state, and local agencies concerning the best management practices (BMPs) available for the prevention, control, and abatement of

environmental pollution. To meet the directives of this Order, NEPA documents should identify how the FAA is complying with the applicable pollution control standards.

*5.5.1e CEQ Memorandum on Pollution Prevention and the National Environmental Policy Act*

This Memorandum encourages early efforts by federal agencies to consider opportunities for pollution prevention. The 2020 Desk Reference indicates that “in accordance with this guidance, the FAA should, to the extent practicable, include pollution prevention considerations in the proposed action and its alternative(s); address pollution prevention in the environmental consequences section; and disclose in the Record of Decision (ROD) the extent to which pollution prevention was considered.”

*5.5.1f FAA Orders and Advisory Circulars*

The 2020 Desk Reference lists several FAA Orders and Advisory Circulars (AC) to be consulted as part of the NEPA process. Those applicable to the Proposed Action of this EA include:

- Order 1050.10C, Prevention, Control and Abatement of Environmental Pollution at FAA Facilities [http://www.faa.gov/documentLibrary/media/Order/ND/1050\\_10c.pdf](http://www.faa.gov/documentLibrary/media/Order/ND/1050_10c.pdf)
- AC 150/5320-15A, Management of Airport Industrial Waste [http://www.faa.gov/documentLibrary/media/advisory\\_circular/150-5320-15A/150\\_5320\\_15a.pdf](http://www.faa.gov/documentLibrary/media/advisory_circular/150-5320-15A/150_5320_15a.pdf)

*5.5.1g State Regulations*

Within the State of Alabama, the Alabama Department of Environmental Management (ADEM) holds primary oversight for the regulation, compliance, and enforcement of policies regarding hazardous waste, solid wastes and pollution prevention. There are numerous state laws pertaining to this impact category and many different Division offices within the Department are responsible for components of each. Successful compliance with applicable state law should be achieved by coordination with the appropriate ADEM Division offices.

**5.3.2 Significant Impact Thresholds**

A significance threshold for hazardous materials, solid waste or pollution prevention has not been established yet by the FAA. However, factors to consider regarding this category include a consideration for whether the Proposed Action or alternatives would violate any applicable federal, state, local, or tribal laws; or create an adverse impact to human health and the environment; or result in a considerable amount of hazardous or non-hazardous waste that may exceed local capacity. The site for the proposed activities should also be investigated to identify if it holds a record for contamination, such as a site listed on the EPA NPL or mapped as a site undergoing cleanup as part of one or more established federal programs. Additionally, the Proposed Action and alternatives should demonstrate compliance with any applicable FAA Orders or ACs pertaining to hazardous materials, solid waste or pollution prevention.

### **5.3.3 Analysis of Hazardous Materials, Solid Waste, and Pollution Prevention**

In order to remain compliant with NEPA and all applicable FAA guidance, an analysis was completed with regard to hazardous and nonhazardous solid waste and pollution prevention. Phase I Environmental Site Assessments (ESAs) were completed as part of the proposed land acquisition. **Figure 4.0** depicts the areas proposed for land acquisition. Parcel 24 was assessed as a separate report, titled 'Lanett Airport Road-Church Property ESA', due to GMC not having access to the parcel for a site reconnaissance. The remaining acquisition parcels were assessed in the 'Lanett Airport Road-Additional Property' ESA. A copy of each Phase I ESA executive summary can be found in **Appendix E**. A complete copy of each report will also be provided.

The 'Lanett Airport Road-Church Property' Phase I ESA concluded that 'GMC's inability to access the subject property or interview the owner constitutes a significant data gap; therefore, GMC is unable to determine whether or not conditions indicative of a release or threatened release are present in, on or at the subject property.' However, the Environmental Data Resources (EDR) government records review for the property revealed that the *church property* was not listed on any of the government databases searched by EDR. A review of the listed facilities surrounding the *church property* determined that none of the facilities were considered an environmental concern in relation to the *church property*. Additionally, a review of historical documentation did not reveal any obvious land uses that would contribute to the finding of an environmental concern. An updated Phase I ESA will be completed for this parcel once access to the property has been granted.

The 'Lanett Airport Road-Additional Property' Phase I ESA concluded that the 'assessment has not revealed evidence of Recognized Environmental Conditions (RECs), and further investigation is not recommended at this time.' However, the EDR government records review revealed evidence of a Leaking Underground Storage Tank (LUST) incident at the Lanett Regional Airport. According to the Radius Map report, the LUST incident was reported in 1997 when contamination was discovered in the process of a UST excavation at the airport. According to documents found on the ADEM efiles database as well as an interview with the ADEM project manager, no corrective actions have taken place since the LUST was discovered.

Due to the overlap in the database search distances, the government records review for the acquisition parcels was able to be used in order to evaluate the remaining portions of the PSA. A reconnaissance of the PSA did not identify the presence of any Recognized Environmental Conditions. Aside from the LUST incident noted within the PSA, no other hazardous waste, solid waste, or pollution discharges were noted.

### **5.3.4 Environmental Consequences of the No-Action Alternative**

The No-Action alternative would leave the site unchanged from the existing condition. As such, the No-Action alternative would not generate hazardous waste, solid waste or result in pollution discharges beyond existing conditions. No significant direct, indirect, or cumulative impacts would result and no further analysis would be necessary and mitigation efforts would not be required.

### **5.3.5 Environmental Consequences of the Preferred Alternative**

During construction, the use of materials classified as hazardous or regulated would consist primarily of fuels and other petroleum-based substances. The construction contractor(s) would be required to store these materials in dedicated staging areas and implement appropriate federal and state BMPs in order to reduce the potential for impacts associated with the handling and use of these materials.

Solid wastes associated with construction of the proposed action and alternative are expected to be comprised of waste materials typical of earthwork and paving projects. The volume of solid waste is expected to be minor during construction. Construction waste not diverted, recycled, or re-used would be transported to and disposed of in local permitted construction/demolition facilities or in accordance with applicable state and local requirements. Therefore, no significant construction-related solid waste impacts would occur.

The identified LUST incident is located at the Lanett Regional Airport, within the PSA. However, contaminated soils/groundwater are not likely to be encountered due to the location of the project activities in relation to the LUST incident site. The entrance road would be constructed at a higher elevation and upgradient to the incident site. GMC has recommended that the Lanett Regional Airport complete the preliminary assessment requested by ADEM.

Through the use of BMPs and adhering to federal, state, and local requirements, the Preferred Alternative is not anticipated to result in significant direct, indirect, or cumulative hazardous materials, solid waste, or pollution impacts. No further analysis would be necessary and mitigation efforts would not be required. If hazardous materials are encountered and identified during construction activities, the proper regulatory agencies will be notified and appropriate actions will be taken by the airport Sponsor and the contractor.

## **5.4 Historical, Architectural, Archeological, and Cultural Resources**

The 2020 Desk Reference defines resources within this environmental impact category as “past and present expressions of human culture and history in the physical environment, such as prehistoric and historic archaeological sites, structures, objects, districts, which are considered important to a culture or community. Historical, architectural, archeological, and cultural resources also include aspects of the physical environment, namely natural features and biota, which are a part of traditional ways of life and practices and are associated with community values and institutions.” Any potential impacts to historical, architectural, archeological, and/or cultural resources that may result from changes in visual effects or negative effects of light emissions should also be discussed in this section, per the 2020 Desk Reference.

### **5.4.1 Regulatory Setting**

There are numerous regulations regarding resources within this impact category. The full listing of applicable federal policies is listed within Appendix B.7 of the FAA 2020 Desk Reference. The following federal statutes (and state equivalents, if applicable) related to historical, architectural, archeological, and cultural resources may be applicable to the activities of the Proposed Action.

#### *5.6.1a Historic Sites Act*

This national policy Act declares that historic sites, objects, properties of national significance, and other similar resources be preserved in public use. It allows the federal government authority to conduct historic surveys, secure and preserve historic data, and to acquire and preserve archeological and historic sites. The Act also establishes the NHLs program which designates “properties having exceptional value in commemorating or illustrating the history of the United States.”

#### *5.6.1b National Historic Preservation Act*

Under Section 106 of the National Historic Preservation Act of 1966 (NHPA), the FAA is required to consider effects to properties listed on the National Registry of Historic Places (NRHP) and coordinate with the appropriate State Historic Preservation Officer (SHPO) on all undertakings that have the potential to affect historic properties. Section 110(f) of the NHPA requires the FAA to evaluate impacts to NHLs. It should be noted that NEPA and NHPA are two separate statutes and each has a unique set of regulations and differing review processes. However, they require similar scoping and agency consultation.

#### *5.6.1c State Regulations*

The Alabama Historical Commission (AHC) acts as the SHPO for Alabama. As such, the AHC has specific responsibilities throughout the Section 106 review process, including offering consultation on the Area of Potential Effect (APE) for a proposed activity. This agency accomplishes their mission through “...two fields of endeavor: preservation and promotion of state-owned historic sites as public attraction; and statewide programs to assist people, groups, towns, and cities with local preservation activities.”

Sites within the state that have been placed on the “National Register” of Historic Places can be identified by using the AHC online historic properties interactive map.<sup>5</sup> This tool is only useful in locating National Register sites and is not exhaustive of all known or unknown historical, architectural, archeological, and cultural resources.

### **5.4.2 Significant Impact Thresholds**

A significance threshold for this environmental impact category has not been established yet by the FAA. However, FAA order 1050.F indicates that special consideration should be given in “situations in which the proposed action or alternative(s) would result in a finding of Adverse Effect through the Section 106 process.” It should be noted that NHPA regulations within 36 CFR § 800.8(a) state that an adverse effect finding does not necessarily require an EIS under NEPA. This is because an Adverse Effect under Section 106 does not directly correlate to a significant effect by NEPA review. In such cases, the FAA will make the final determination on the level of impact under NEPA. The Section 106

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<sup>5</sup> <https://ahc.alabama.gov/nationalregister.aspx>

consultation process and guidance from the Advisory Council on Historic Preservation and the SHPO may assist the FAA in this determination.

### **5.4.3 Analysis of Historical, Architectural, Archeological, and Cultural Resources**

The project area for Section 106 investigations is known as the Area of Potential Effects (APE). Per 36 CFR § 800.4(a), the APE is typically considered "...the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." The 2020 Desk Reference also identifies other factors to consider when determining the APE. These include operational effects, such as increased noise, vibration, lighting, and increased traffic and ground-disturbing effects, such as site excavation, staging and construction areas.

A Cultural Resource Assessment was completed at the PSA by TG Earnest & Associates, dated August 4, 2023 (**Appendix B**). Background research consisted of examining Federal and State databases containing information regarding archaeological sites, historic structures, and historic properties within or near the PSA, as well as research designed to provide a basic historical context for the study area within which results could be objectively quantified. One (1) historic cemetery (1Ch150) and three (3) archaeological sites (1Ch155, 1Ch196, 1Ch197) were listed within a one-mile radius of the PSA. The sites are not located within the direct APE and will not be impacted by the proposed development.

TG Earnest & Associates conducted the fieldwork for the CRA on April 28, 2023. The field investigation consisted of pedestrian transects and subsurface investigation. No cultural resources were observed on the surface or from shovel tests. Based on the results of the CRA, TG Earnest & Associates concluded that the proposed project should have no effect upon historic properties and should be allowed to proceed with no further archaeological investigations.

The FAA submitted the CRA to the Alabama Historical Commission in a letter dated August 08, 2023. The SHPO responded with a final determination letter, dated December 15, 2023, stating that they concur with the finding that the project will have no effect upon historic properties. A copy of their response can be found in **Appendix D**.

### **5.4.4 Environmental Consequences of the Alternatives**

#### *5.4.4a Alternative 1: No-Action*

The No-Action alternative would result in no construction of the entrance road, perimeter fencing, or clearing of obstructions, leaving the site unchanged from the existing condition. The area of the proposed project site would continue to be utilized for its current use. As such, the No-Action alternative would not generate impacts to known or unknown historical, architectural, archeological, and cultural resources. No further analysis would be necessary and mitigation efforts would not be required.



#### *5.4.4b Preferred Action (Alternative 3)*

The Preferred Action would involve the construction of a new entrance road, road spur, and perimeter fencing as well as clearing of obstructions and wildlife hazards. However, since no archaeological sites were identified during the CRA investigation and the SHPO concurred that no historic properties will likely be affected by the proposed development, no additional archaeological investigations are necessary and mitigation efforts would not be required.

## **5.5 Land Use**

Compatible land use on and near to an airport is usually associated with noise impacts. However, in addition to noise other potential impacts of FAA actions on compatible land uses may involve the “disruption of communities, relocation, induced socioeconomic impacts, and land uses protected under Section 4(f).” Land uses in regards to these resources are discussed in their respective sections. With respect to airports, discussion of this impact category should give assurances that activities associated with each alternative conform to compatible land uses to the greatest extent practicable. This also applies to lands in the immediate vicinity of the airport and should include any applicable zoning regulations. The assurances must correlate to known existing and planned land uses.

### **5.5.1 Regulatory Setting**

Chapter 9 of the 2020 Desk Reference identifies the regulations and statutes that may be related to the evaluation of Land Use. The following federal regulations (and state equivalents, if applicable) are those that address compatible land use at airports and are applicable to the activities of the Proposed Action.

The Airport Improvement Program (AIP) is a federal program supplying grants for the planning and development of qualifying projects at public-use airports included in the NPIAS. For a proposed project to be considered for AIP funding, assurances must be provided that a project is consistent with existing development and/or land use plans for the area in which the airport is located. This includes assurances that proposed activities are compatible with normal airport operations, including the landing and takeoff of aircraft.

### **5.5.2 Significant Impact Threshold**

The FAA has not established a significance threshold for land use. However, the 2020 Desk Reference indicates that “if the proposal would result in other impacts that have land use ramifications, for example, disruption of communities, relocation, and induced socioeconomic impacts, the impacts on land use should be analyzed in these contexts and described accordingly”. Additionally, while the EA must identify whether a proposed action or alternative(s) are consistent with state or local plans, an inconsistency may not, by itself, automatically generate a significant impact under NEPA review.

### **5.5.3 Analysis of Land Use**

In many cases, existing and planned land uses are determined by zoning ordinances put into place by the municipality having jurisdiction over the location of the land parcel. The Lanett Zoning Map

provided on the City of Lanett website as well as the ALP was used to determine existing land uses and any planned developments for surrounding properties. According to the zoning map, parcels within the PSA are currently zoned for General Business and Airport Zone. The majority of the land acquisition parcels are not zoned.

Since the airport began operation in 1959, the land uses in the surrounding area have continued to change and become more developed. Although originally surrounded by agricultural and forested property, much of the land has been converted to residential, commercial, and industrial developments.

#### **5.5.4 Environmental Consequences of the Alternatives**

##### *5.5.4a Alternative 1: No-Action*

The No-Action alternative will not change the existing or future land uses within airport property or in areas within the immediate vicinity of the airport. As a result, it will have no direct, indirect, or cumulative impacts on land use. No further analysis is required.

##### *5.5.4b Preferred Action (Alternative 3)*

The Preferred Action would include the relocation of two (2) residential homes, one (1) commercial business (roofing company), and one (1) church. The land use would be converted from its current use to airport property containing an airport entrance road. Relocation assistance would be provided for the proposed relocations. The proposed land use would be compatible with the adjacent airport infrastructure; therefore, no further analysis is required.

### **5.6 Socioeconomics, EJ, and Children's Environmental Health and Safety Risks**

This section covers socioeconomics (Section 5.6.1), environmental justice (Section 5.6.2), and children's environmental health and safety risks (Section 5.6.3).

#### **5.6.1 Socioeconomics**

Socioeconomics is an umbrella term used to describe aspects of a project that are either social or economic in nature. A socioeconomic analysis evaluates how elements of the human environment such as population, employment, housing, and public services might be affected by the proposed action and alternative(s).

##### *5.6.1.1 Regulatory Setting*

The primary statute related to socioeconomic impacts is the Uniform Relocation Assistance and Real Property Acquisitions Policy Act of 1970. In summary, this act contains provisions that must be followed if acquisition of real property or displacement of people would occur as a result of implementing the selected alternative.

#### *5.6.1.2 Significance Threshold*

The FAA has not established a significance threshold for socioeconomics in FAA Order 1050.1F; however, the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts for socioeconomics (see Exhibit 4-1 of FAA Order 1050.1F). Please note that these factors are not intended to be thresholds. If these factors exist, there is not necessarily a significant impact; rather, the FAA must evaluate these factors in light of context and intensity to determine if there are significant impacts.

#### *5.6.1.3 Environmental Consequences of the No-Action Alternative*

The No-Action alternative will not change the human environment such as population, employment, housing, and public services in the location of the proposed airport or in areas within the immediate vicinity of the proposed airport. As a result, it will have no direct, indirect, or cumulative socioeconomic impacts. No further analysis is required.

#### *5.6.1.4 Environmental Consequences of the Proposed Action*

The proposed action would not have a potential impact on individuals' income, population, or public services within the PSA. The proposed action would result in the acquisition of various parcels as well as the relocation of three (3) residential homes, one (1) business, and one (1) church in order to construct the new roadway and remove obstructions. The existing entrance road (51<sup>st</sup> Avenue SW), which provides access to several residences as well as the new terminal building, would remain open for local traffic; therefore, no impacts to the local users of 51<sup>st</sup> Avenue SW would occur.

#### *5.6.1.5 Mitigation*

Two (2) of the three (3) residential homes to be acquired are currently occupied. The business is operated from one of the residences; however, a large warehouse building onsite is utilized for storage of supplies and equipment for the company. Additionally, the church is currently in operation. All land and building acquisitions/transfers will abide the FAA AC for acquisitions and the Uniform Relocation Assistance and Real Property Acquisition Policies Act.

### **5.6.2 Environmental Justice**

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

#### *5.6.2.1 Regulatory Setting*

The statutes and Executive Orders relevant to this category are provided in Chapter 12 of the 2020 Desk Reference. In summary, Title VI of the Civil Right Act of 1964 states that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving

Federal financial assistance.” Title VI explicitly prohibits any discrimination in Federally funded programs and projects, including those sponsored by the FAA.

#### *5.6.2.2 Significance Threshold*

The FAA has not established a significance threshold for environmental justice in FAA Order 1050.1F; however, the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts for environmental justice (see Exhibit 4-1 of FAA Order 1050.1F). Please note that these factors are not intended to be a threshold. If these factors exist, there is not necessarily a significant impact; rather, the FAA must evaluate these factors in light of context and intensity to determine if there are significant impacts.

#### *5.6.2.3 Environmental Consequences of the No-Action Alternative*

The No-Action alternative would not have any impact on other environmental impact categories nor would it have an impact on the physical or natural environment that affect an environmental justice population. As a result, it will have no direct, indirect, or cumulative environmental justice impacts. No further analysis is required.

#### *5.6.2.4 Environmental Consequences of the Proposed Action*

According to EPA’s Environmental Justice Screening and Mapping Tool, the PSA and areas immediately surrounding the PSA contain populations within the 18<sup>th</sup> percentile for people of color and the 70<sup>th</sup> percentile for low income. These percentiles are consistent with populations in the surrounding area; therefore, the project will not have a disproportionate impact on a specific group of people within the community. Additionally, the project purpose is to reroute the existing entrance road in order to avoid sensitive community areas. The existing entrance route transects residential areas and a school zone. The proposed action would route airport traffic away from these sensitive community areas. All land and building acquisitions/transfers will abide by the FAA AC for acquisitions and the Uniform Relocation Assistance and Real Property Acquisition Policies Act. Therefore, there would be no direct, indirect, or cumulative impacts to environmental justice populations as a result of the proposed action.

### **5.6.3 Children’s Environmental Health and Safety Risks**

Pursuant to Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks 62 Federal Register 19885, (April 21, 1997), Federal agencies are directed, as appropriate and consistent with the agency’s mission, to make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children. The FAA is encouraged to identify and assess environmental health risks and safety risks that the agency has reason to believe could disproportionately affect children. Environmental health risks and safety risks include risks to health or to safety that are attributable to products or substances that a child is likely to come in contact with or ingest, such as air, food, drinking water, recreational waters, soil, or products they might use or be exposed to.

#### *5.6.3.1 Regulatory Setting*

The Executive Order relevant to this category are provided in Chapter 12 of the 2020 Desk Reference. In summary, The Executive Order directs Federal agencies to analyze their policies, programs, activities, and standards for any environmental health or safety risks that may disproportionately affect children. Included in these categories are risks to health or safety that are attributable to products or substances that a child is likely to come in contact with or ingest, such as air, food, water, recreational waters, soil, or products they might use or be exposed to.

#### *5.6.3.2 Significance Threshold*

The FAA has not established a significance threshold pertaining to impacts to children's environmental health and safety in FAA Order 1050.1F; however, the FAA has identified a factor to consider when evaluating the context and intensity of potential environmental impacts for children's environmental health and safety (see Exhibit 4-1 of FAA Order 1050.1F). Please note that this factor is not intended to be a threshold. If this factor exists, there is not necessarily a significant impact; rather, the FAA must evaluate this factor in light of context and intensity to determine if there are significant impacts. The factor to consider that may be applicable to children's environmental health and safety includes, but is not limited to, situations in which the proposed action or alternative(s) would have the potential to lead to a disproportionate health or safety risk to children.

#### *5.6.3.3 Environmental Consequences of the No-Action Alternative*

The No-Action alternative would not have any impact on other environmental impact categories nor would it have an impact on the physical or natural environment that would affect children's health or safety. As a result, it will have no direct, indirect, or cumulative children's health or safety impacts. No further analysis is required.

#### *5.6.3.4 Environmental Consequences of the Proposed Action*

The project purpose is to reroute the existing entrance road in order to avoid sensitive community areas. The existing entrance route transects residential areas and a school zone associated with the Hugely Elementary School. The proposed action would route airport traffic away from these sensitive community areas. There are no schools, daycares, parks, or children's health clinics in the location of the proposed action activities; therefore, no impact to children's health or safety would result from the proposed action. There would be no direct, indirect, or cumulative impacts to children's health or safety as a result of the proposed action.

## **5.7 Visual Effects**

FAA Order 5050.4B and FAA Order 1050.1F require project sponsors to identify the light emissions (e.g., strobe lights, high-intensity airfield or facility lighting) associated with a Proposed Action that could visually affect a light-sensitive area (including residential areas, parks, and recreational areas). The FAA is also required to consider whether visual or aesthetic impacts would result from a Proposed Action. Per the 2020 Desk Reference, light emissions and visual effects should each be discussed discretely in this section. Additionally, this reference instructs: "Visual effects on resources discussed in other sections of a NEPA document should

be discussed in those sections, and cross-referenced in this section.” The overlap between this impact category and others is a result of certain resources contributing to the suite of elements that create the whole of the visual environment. The visual impacts for other required categories that are discussed in those associated sections within this EA are a) Biological Resources; b) Department of Transportation Act, Section 4(f); c) Historical, Architectural, Archeological, and Cultural Resources; and d) Wild and Scenic Rivers (a component of Water Resources).

### **5.7.1 Regulatory Setting**

There are no formal federal regulations, permits or other approvals that are related to this impact category. However, there may be special purpose laws and requirements that should be researched during analysis. Informal consultation is recommended with local agencies, adjacent communities, and the AHC, as Section 106 and or Section 4(F) resources may be influenced by changes to visual effects. There also may be state and local regulations, policies, and zoning ordinances that apply to visual effects and or light emissions.

### **5.7.2 Significance Threshold**

The FAA has not established a significance threshold for either light emissions or visual effects. The 2020 Desk Reference does include factors and questions to consider when analyzing this category. For Light Emissions, this includes an evaluation to determine whether the Proposed Action will cause a general annoyance or interfere with normal activities. Additionally, potential negative impacts to the visual character of the area due to light emissions from the proposed project should be considered. These include determining the importance, uniqueness, and aesthetic value of visual resources in the area. With respect to Visual Effects, the assessment should also address the potential for the Proposed Action to contrast with the visual character of the area and if the activity will negatively affect the nature of the area’s visual character, including the importance, uniqueness, and aesthetic value. Finally, if the Proposed Action will block or obstruct the views of visual resources, this effect should also be discussed.

### **5.7.3 Analysis of Visual Effects**

The affected environment for visual effects includes the PSA, as well as areas immediately adjacent and surrounding the airport. This section will identify the extent that the proposed project may produce light emissions that may interfere with normal activity or affect the area, which is visually characterized by undeveloped forested land, rural residential, commercial and industrial land use outside the airport. There are no recorded scenic resource protection areas, such as Wild and Scenic Rivers, or areas of similar designation in visual proximity to the airport. **Table 5.3** provides a summary of the factors to consider when performing an analysis of impacts to this category, as described in Exhibit 4-1 of the 2020 Desk Reference.

**TABLE 5.3: SUMMARY OF VISUAL EFFECTS ANALYSIS – FACTORS TO CONSIDER**

Factor from 2020 Desk Reference	Potential Effect by Proposed Action?
<b>Light Emissions:</b> The Proposed Action will create an annoyance or otherwise interfere with normal activities.	The proposed project would be adjacent to the existing airport facility and would transect areas surrounded by commercial and industrial development. Construction, operation, and maintenance of the roadway and fence is not expected to project significant light emissions to areas outside the PSA and light will not interfere with normal activities.
<b>Light Emissions:</b> The visual character of the area due to light emissions - including the importance, uniqueness, and aesthetic value of the affected visual resources – will be significantly affected by the Proposed Action.	There are no recorded scenic resource protection areas, such as Wild and Scenic Rivers, or areas of similar designation in visual proximity to the airport. The area already supports lighting for the existing runway as well as surrounding developments. No significant changes to lighting will occur.
<b>Visual Effects:</b> Adverse impacts to the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources will result from the Proposed Action.	The visual appearance of the PSA with change from mostly forested areas to an entrance road and perimeter fence; however, the proposed development is consistent with development in the surrounding area. No adverse impacts to the visual character of the area would occur.
<b>Visual Effects:</b> The Proposed Action will contrast with the visual resources and/or character in the study area.	The proposed project would be adjacent to the existing airport facility and would transect areas surrounded by commercial and industrial development; therefore, no contrast with the visual resources and/or character of the study area would occur.
<b>Visual Effects:</b> To what degree will the Proposed Action potentially block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations?	The Proposed Action will not result in significant obstruction of visual resources.

*Source: Significance Thresholds and factors to consider established in FAA Order 1050.1F and FAA 2020 Order 1050.1F Desk Reference*

## 5.7.4 Environmental Consequences of the Alternatives

### 5.5.4a Alternative 1: No-Action

The No-Action alternative will result in no construction or activities associated with the proposed action; therefore, will not have any visual effects. No further analysis is required.

### 5.5.4b Preferred Action (Alternative 3)

Significant change to the visual aesthetic of the airfield will not occur nor will the resulting visual effects conflict with the existing environment. There are no recorded scenic resource protection areas, such as Wild and Scenic Rivers, or areas of similar designation in visual

proximity to the airport. The PSA currently consists of unzoned parcels as well as parcels zoned for General Business and Airport Zone. The Preferred Alternative would reroute the existing entrance road to avoid light sensitive areas such as the dense residential area that the existing route transects. The proposed project would be rerouted to areas designated for general business development as well as airport use. Relocation assistance would be provided for two (2) existing residences, one (1) commercial business, and (1) church; therefore, the project would have no visual effect to the homes or entities currently occupying the PSA. Additionally, no historic properties are located within the project viewshed. No significant direct, indirect, or cumulative visual effects are anticipated due to the implementation of the Preferred Alternative. No further analysis would be required.

## **5.8 Water Resources**

Water Resources are defined by the EPA as “lakes, streams, groundwater, coastal waters, wetlands, and other waters; their associated ecosystems; and the human uses they support (e.g., drinking water, recreation, and fish consumption).” The quality and distribution of available water resources are essential to both human and ecosystem health. Proper stewardship of water resources also promotes proper functionality and sustainability of the hydrologic cycle. Per the 2020 Desk Reference, this chapter should discuss the following main topics: a) Wetlands; b) Floodplains; c) Surface Waters; d) Groundwater; and e) Wild and Scenic Rivers. Each of these components is interrelated within a watershed and, as a whole, support the local watershed system.

Per FAA Order 1050.1F, “if an environmental impact category is not relevant to the proposed action or any of the reasonable alternatives identified (i.e., the resources included in the category are not present or the category is not otherwise applicable to the proposed action and alternative[s]), this should be briefly noted and no further analysis is required.” As such, a discussion of these resources will not be included in the subsequent subsection of this chapter.

### **Non-Applicable Water Resource Impact Categories**

#### *Floodplains*

##### Regulatory Setting for Floodplains

Floodplains are defined in DOT Order 5650.2 as “lowlands and relatively flat areas adjoining inland and coastal waters including flood prone areas of offshore islands.” FAA Order 1050.1E requires FAA officials “to take actions to reduce the risk of flood loss, minimize the impact of floods on human safety, health, and welfare, and restore and preserve the natural and beneficial values served by the floodplains” (Executive Order 11988, Flood Plain Management Act and DOT Order 5650.2). To comply, all FAA actions must avoid floodplains to the greatest extent practicable. The objective of an EA floodplain analysis is to determine if a proposed action encroaches on the base floodplain. The 100-year floodplain is considered the base floodplain in this evaluation and Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) are used as the primary information source. In order to differentiate between differing levels of flood hazard, FEMA created an array of zones corresponding to a location’s actual flood risk. The Federal Emergency Management Agency (FEMA) flood zone designations include: Zone A (subject to inundation by the 1% annual-chance flood event with no base flood elevation (BFE) determined), Zone AE (subject to inundation by the 1% annual-



chance flood event with BFE determined), Zone VE (subject to inundation by the 1% annual-chance flood event with additional hazards due to storm waves, BFE determined), and Zone X (minimal risk areas outside the 1% and 0.2% annual-chance floodplains with no BFE or base flood depths determined). In addition, some areas have special flood-related hazards and are designated as Special Flood Hazard Areas (SFHA). A SFHA is an area where National Flood Insurance Program (NFIP) floodplain management regulations must be enforced.

In this case, FEMA flood designation for the entirety of the PSA, and much of the surrounding airfield, is Zone X (unshaded), based on current FEMA FIRMs. The nearest floodplain or floodway is located on the south end of the runway and is associated with an unnamed tributary of Osanippa Creek. The Proposed Action would not result in floodplain encroachment; therefore, no further analysis is needed.

#### *Groundwater*

The 2020 Desk Reference defines groundwater as subsurface water that occupies the space between sand, clay and rock formations, and an aquifer as the geologic layers that have the ability to store or transmit groundwater to wells, springs and other water sources. The EPA has designated certain aquifers as sole source aquifers and if impacts are anticipated to a sole source aquifer, then the EPA regional office must be consulted with as required by the Safe Drinking Water Act (SDWA). To remain compliant with NEPA, the project boundaries were analyzed for EPA-designated sole source aquifers. None were identified. No effects to groundwater resources are expected.

#### *Wild and Scenic Rivers*

The Department of the Interior National Park Service (NPS), USFWS, Bureau of Land Management (BLM), and the Department of Agriculture (US Forest Service) has oversight of the Wild and Scenic Rivers Act of 1968. The FAA is required to determine if the Proposed Action or the No-Action alternative would affect a designated area under the National Wild and Scenic River System (WSRS) or a free-flowing water body designated under the Nationwide Rivers Inventory (NRI). The Sipsey Fork of the West Fork River within the Bankhead National Forest in northwest Alabama is the only river in Alabama designated as wild & scenic. The nearest water-bodies designated under the NRI are Halawakee Creek located approximately 8 miles southwest of the PSA and Falt Shoal Creek located approximately 5 miles east of the PSA. No effects to WSRS or NRI designated water bodies are expected.

#### **Regulatory Setting**

The suite of applicable laws, statutes, and other regulations for this impact category is quite extensive and is fully disclosed within the 2020 Desk Reference. Some provisions include protections that overlap the impact categories discussed. **Table 5.4** provides some of the primary mandates for consideration when evaluating potential effects to applicable water resources categories by the proposed project. This list is not exhaustive. Thorough coordination with all regulatory agencies having authority over the proposed activities should be done to ensure full compliance with all applicable regulations.

**TABLE 5.4: REGULATIONS APPLICABLE TO WATER RESOURCES FOR PROPOSED ACTION\***

Statute	Applicable Impact Categories	Oversight Agency	Summary
Clean Water Act (CWA)	<ul style="list-style-type: none"> <li>Wetlands</li> <li>Surface Waters</li> </ul>	EPA, USACE, state, and tribal Water Quality Agencies	Establishes structure for regulating the discharge of pollutants into waters of the US. Specifically, CWA Section 303(d), Section 404, Section 401, and Section 402.
Executive Order 11990, <i>Protection of Wetlands</i> ;			Requires federal agencies to “avoid to the extent possible” any adverse impacts to wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a “practicable alternative”. Transportation facilities should be designed and operated to assure the protection and enhancement of wetlands to the fullest extent practicable.
DOT Order 5660.1A, <i>Preservation of the Nation’s Wetlands</i>	<ul style="list-style-type: none"> <li>Wetlands</li> </ul>	DOT	
Fish and Wildlife Coordination Act	<ul style="list-style-type: none"> <li>Wetlands</li> <li>Surface Waters</li> </ul>	USFWS, NMFS, State wildlife agencies	Federal agencies are to consult with the USFWS and/or the NMFS, and appropriate state wildlife agencies regarding conservation of wildlife resources for projects that may affect the water of any stream or other water body, including wetlands.
Rivers and Harbors Act	<ul style="list-style-type: none"> <li>Wetlands</li> <li>Surface Waters</li> </ul>	USACE; USCG	Established to protect the navigability of waters used for commerce in the United States.
Safe Drinking Water Act	<ul style="list-style-type: none"> <li>Surface Waters</li> <li>Groundwater</li> </ul>	EPA	Prohibits federal agencies from funding actions that would contaminate an EPA-designated sole source aquifer or its recharge area.

DOT = U.S. Department of Transportation; EPA = Environmental Protection Agency; FEMA =Federal Emergency Management Agency; NFIP= National Floodplain Insurance Program NMFS = National Marine Fisheries Service; USACE = U.S. Army Corps of Engineers; USFWS = U.S. Fish and Wildlife Service.

*\*In addition to the above, there may be state and local regulations that apply to the proposed project. This is determined on a case-by-case basis by contacting relevant state and local agencies in the early stages of project planning.*

## 5.8.1 Wetlands

### 5.8.1a Regulatory Setting for Wetlands

Wetlands addressed in this section include jurisdictional wetlands and other Waters of the U.S. (WOTUS) designated under Section 404 of the CWA, further defined under 33 CFR § 328.3(a). Any surface water, or associated wetland, not meeting this federal definition is considered non-jurisdictional and does not receive statutory protection under the CWA. Under Section 404, the USACE has authority and responsibility for regulating activities that involve wetlands connected to WOTUS. Wetlands are lowland areas covered with shallow and sometimes temporary or

intermittent waters. They include, but are not necessarily limited to the following: swamps, marshes, bogs, river overflows, and tidal overflows, as well as estuarine areas and shallow lakes and ponds with emergent vegetation. Wetlands have been federally characterized by the presence of specific types of vegetation, hydrology, and soils.

Filling or disturbing wetlands for commercial development, public infrastructure, etc. are some of the regulated activities controlled by a permit review process administered by the USACE. The USACE also enforces Executive Order 11990, Protection of Wetlands, which requires Federal agencies to avoid, to the extent possible, adverse impacts associated with the destruction or modification of wetlands. The State of Alabama has not adopted its own wetland regulations; however, if an alteration to a federally regulated wetland will occur as a part of a proposed action, then Water Quality Certification (WQC) must be obtained from ADEM, ensuring the proposed action would not violate state water quality standards. The USACE may require compensatory mitigation for impacts to wetland resources.

#### *5.8.1b Significance Threshold for Wetlands*

FAA Order 1050.1F identifies that significant impacts to wetlands would occur when a proposed activity would a) adversely affect a wetland's function to protect the quality or quantity of municipal water supplies (including surface waters and sole source or other aquifers); b) substantially alter the hydrology needed to sustain the affected wetland's values and functions (or those of a connected wetland); c) substantially reduce the affected wetland's ability to retain floodwaters or storm runoff, thereby threatening public health, safety or welfare (welfare includes cultural, recreational, and scientific resources or property important to the public); d) adversely affect the maintenance of natural systems supporting wildlife and fish habitat, or economically important timber, food, or fiber resources of the affected or surrounding wetlands; e) promote development of secondary activities or services that would cause the circumstances listed above to occur; or f) be inconsistent with applicable state wetland strategies.

#### *5.8.1c Analysis of Wetlands*

The proposed action would require the placement of fill material within several wetland areas as well as the conversion of forested wetlands to emergent wetlands as part of the obstruction and wildlife hazard removal activities. Analysis to determine if these impacts are significant is necessary. **Table 5.5** provides a summary of the thresholds and factors to consider when performing an analysis of impacts to this category, as described in Exhibit 4-1 of the 2020 Desk Reference.

**TABLE 5.5: SUMMARY OF WETLAND RESOURCE ANALYSIS**

FAA Threshold	Proposed Action Meets or Exceeds Threshold?
<b>Threshold:</b> Adverse effects to wetland’s function to protect the quality or quantity of municipal water supplies, including surface waters and sole source and other aquifers	No
<b>Threshold:</b> Substantially alter the hydrology needed to sustain the wetland values and functions or those of a connected wetland	Minimal
<b>Threshold:</b> Substantially reduce the wetland’s ability to retain floodwaters or storm runoff, thereby threatening public health, safety or welfare	No
<b>Threshold:</b> Adversely affect the maintenance of natural systems supporting wildlife and fish habitat or economically important timber, food, or fiber resources of the affected or surrounding wetlands	No
<b>Threshold:</b> Promote development of secondary activities or services that would cause the circumstances listed above to occur	No
<b>Threshold:</b> Be inconsistent with applicable state wetland strategies	No, appropriate permits will be obtained.

*Source: Significance Thresholds and factors to consider established in FAA Order 1050.1F and FAA 2020 Order 1050.1F Desk Reference*

GMC utilized a multi-step approach in order to conduct the delineation of Waters of the U.S. (WOTUS) (including wetlands and streams) for the review area. This consists of a review of readily available resources to preliminarily identify potential WOTUS within the study area. These resources include a review of historical aerial photographs, USGS Quadrangle Maps, NRCS Web Soil Survey, and the USFWS National Wetland Inventory (NWI). A site reconnaissance was then performed to identify and delineate potential WOTUS in accordance with the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region (Version 2.0).

Professional Wetland Scientists and Biologists with GMC visited the PSA in January, March and April of 2023 to delineate WOTUS, including wetlands and streams, within the PSA (excluding Parcel 24 due to no access). The wetland boundaries were flagged according to the three required wetland criteria (vegetation, hydrology, and soils). The site was examined for the presence of hydric soils, hydrophytic vegetation, and wetland hydrology. A Munsell Soil Color Book was used to profile soil colors. The wetlands identified were flagged using “Wetland Delineation” flagging and a Trimble Geo 7X GPS unit with sub-meter accuracy was used to map onsite features.

During the WOTUS delineation, twelve (12) wetland areas were identified within the PSA (**Figure 9.0**). The following sections describe these features in more detail. Wetland hydrology indicators observed within the wetlands included surface water, saturation, water-stained leaves, and

drainage patterns. The soils within the wetlands had a low chroma, which is characteristic of hydric soils. The most prominent hydric soil indicator identified was a depleted matrix. Plant species indicative of wetland areas that were noted on site included black willow (*Salix nigra*), palmetto (*Sabal minor*), *juncus* sp., and netted chain fern (*Woodwardia areolate*). **Table 5.6** below summarizes the wetlands delineated on site.

It should be noted that the boundary for wetland W11b depicted on parcel 24 in **Figure 9.0** is an estimate based on the location of the wetland boundary on the adjacent parcel. GMC has not been granted access to parcel 24; therefore, the exact extents of the wetland boundary have not been delineated.

**Table 5.6: Delineated Wetlands**

Wetland	Acres
W1	6.64
W2	0.02
W3	0.34
W4	0.71
W5	0.28
W6	9.04
W7	0.13
W8	0.07
W9	0.66
W10	0.13
W11	0.02
W11b (estimate)	0.56
<b>Total</b>	<b>18.04</b>

**5.8.1d** *Environmental Consequence of the No-Action Alternative*

The No-Action alternative will not result in any activities taking place at the airport and, therefore, will not have any impacts to wetlands. No further analysis would be required.

**5.8.1e** *Environmental Consequences of the Preferred Alternative*

The Preferred Alternative includes direct impacts to wetlands as a result of construction activities. Direct impacts are associated with the placement of fill materials into wetlands and other surface waters that are regulated by the USACE. The Preferred Alternative will also include

the removal of trees within the Runway 24 approach as well as inside the proposed perimeter fencing. The proposed project would require the placement of fill material within  $\pm$  2.25 acres of wetlands. Approximately 10.95 acres of wetlands would be converted from forested wetlands to emergent wetlands. The wetlands located within the areas proposed for clearing would not be grubbed. The stumps would remain in place and the wetland areas would be maintained as emergent wetlands via periodic application of herbicide. The wetland conversion impacts take into account the estimated 0.56 acres of W11b. The exact extents of the W11b boundary will be delineated once GMC has access to the property. **Figure 10.0** depicts the location of the wetland fill impacts as well as the wetland conversion impacts.

Wetland impacts were one of the criteria considered when determining which project alternative would be the proposed action. Alternative 2 would impact approximately 1.47 more acres of wetlands than the proposed action. Alternative 4 would impact  $\pm$ 1.58 more acres of wetlands than the proposed action.

#### *5.8.1f Avoidance and Minimization of Wetland Impacts*

Avoidance and minimization of impacts to wetlands will be considered, however, all impacts are likely unavoidable. Environmental impacts were considered during early design of the proposed road corridor and the preferred alternative was determined to have less impacts than Alternative 4. Environmental impacts are one of the driving factors in determining which alternative is the preferred. The appropriate permitting and mitigation will be obtained for the proposed impacts.

#### *5.8.1g Consultations, Permits, and Other Approvals for Wetland Impacts*

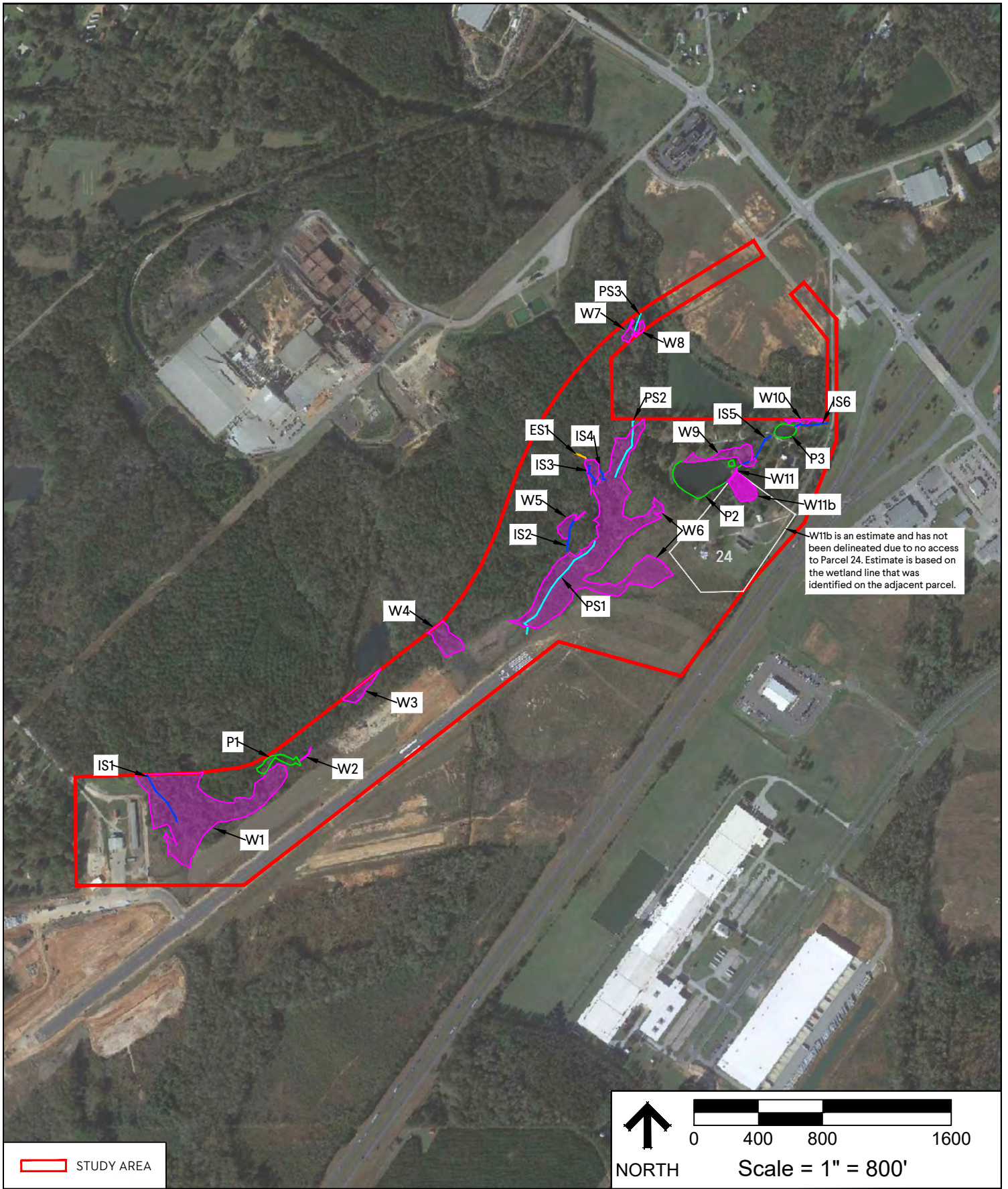
The USACE has regulatory responsibilities pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403). Under Section 10, the USACE regulates any work in, or affecting, navigable waters of the U.S. It appears the review area does not include navigable waters of the U.S. and would not be subject to the provisions of Section 10. Under Section 404, the USACE regulates the discharge of dredged and/or fill material into waters of the U.S., including wetlands.

A USACE Preliminary Jurisdictional Determination (PJD) (excluding parcel 24) was issued for the PSA on September 25, 2023. The PJD is attached in **Appendix C**. A PJD for Parcel 24 will be obtained from the USACE once access to the property is granted. It is estimated that the parcel contains approximately 0.56 acres of wetlands. The PJD is non-binding, cannot be appealed and only provides a written indication that waters of the U.S, including wetlands, may be present on-site. For the purpose of computation of impacts, compensatory mitigation requirements and other resource protection measures, a permit decision made on the basis of a PJD will treat all waters that would be affected in any way by the permitted activity on the site as if they are jurisdictional waters of the U.S.

*5.8.1h Mitigation for Wetland Impacts*

Wetland impacts would require a USACE permit and the impacts would be mitigated through credit purchases from an approved mitigation bank. Based on estimated impacts, it is likely that the USACE will require a Section 404 individual permit.





REF. SHEET: ESRI WORLD IMAGERY  
DESCRIPTION: FAA ENVIRONMENTAL ASSESSMENT

**Lanett Regional Airport  
Entrance Road and Improvements Project**  
Lanett, Chambers County, Alabama

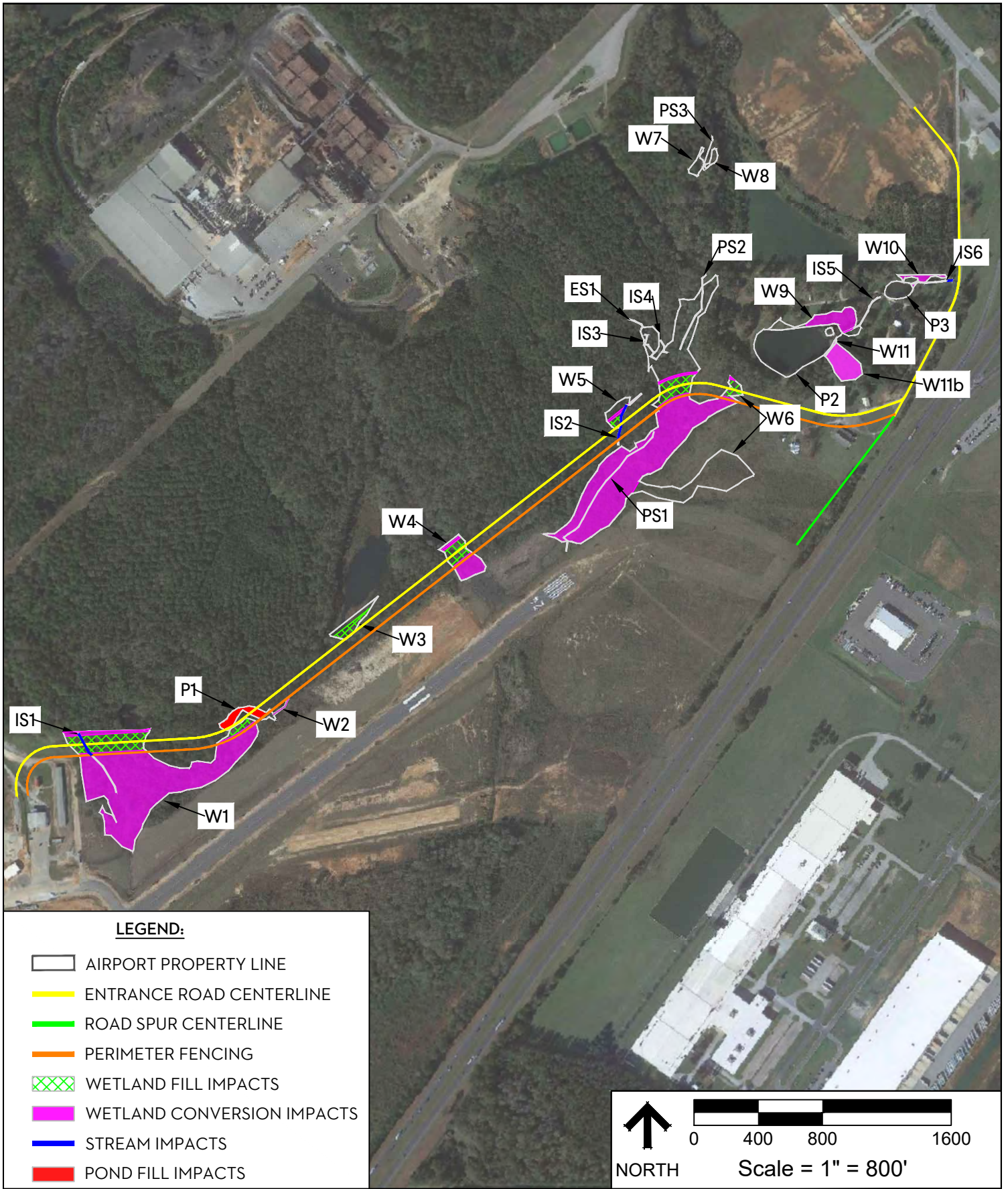
**Figure 9.0**

WOTUS DELINEATION MAP  
GMC # EMHM21A010  
DATE: 08.14.23  
DRAWN BY: AYH

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## **5.8.2 Surface Waters**

Per the FAA 2020 Desk reference, surface waters include “streams, rivers, lakes, ponds, estuaries, and oceans”. In addition to discussing impacts to these resource features, this section also discusses how to assess potential impacts to water quality standards that is not otherwise captured in discussion of other water resources in this impact category.

### *5.8.2a Regulatory Setting for Surface Waters*

Similar to Wetland Resources, surface waters receive federal protection under the CWA, Safe Drinking Water Act (SWDA), the Fish and Wildlife Coordination Act, and the Rivers and Harbors Act. In addition to regulating direct impacts and/or modifications to surface waters, the CWA and SWDA also set standards for maintain water quality within surface waters. In addition to these regulations, this impact category is provided further protections by state statutes, as described below.

The Alabama Department of Environmental Management (ADEM) facilitates the federal National Pollutant Discharge Elimination System (NPDES) program. This program was developed to reduce the discharge of pollutants to creeks, rivers, and lakes by means of a permitting process. The most common in Alabama is the NPDES Construction Stormwater Permit. This permit is obtained from the ADEM Water Division and is required for all construction projects involving clearing, grading, or excavation resulting in the disturbance of one or more acres. It may also apply to projects that would result in the disturbance of less than an acre, if it is part of a larger development.

### *5.8.2b Significance Threshold for Surface Waters*

FAA Order 1050.1F indicates the threshold for significant impacts to Surface Waters will occur if the Proposed Action would:

- Exceed water quality standards established by federal, state, local, tribal agencies; or
- Contaminate public drinking water supply such that public health may be adversely affected.

In addition to these thresholds, FAA Order 1050.1F provides additional factors to consider when evaluating potential impacts to surface waters. These factors are not intended to be thresholds and, should one or more of the factors exist, that does not automatically imply a significant impact for NEPA review. The FAA will evaluate the context and intensity of the given factors to determine if impacts are significant. These factors include, but may not be limited to, situations in which the Proposed Action may have the potential to a) adversely affect natural and beneficial water resource values to a degree that substantially diminishes or destroys such values; b) adversely affect surface waters such that the beneficial uses and values of such waters are appreciably diminished or can no longer be maintained and such impairment cannot be avoided or satisfactorily mitigated; or c) present difficulties based on water quality impacts when obtaining a permit or authorization.

5.8.2c *Analysis of Surface Waters*

The Proposed Action includes the construction of a new entrance road, road spur, and perimeter fence as well as additional land clearing. The project requires the development of currently undeveloped land; therefore, the project has the potential to impact surface waters. Direct impacts and/or modifications to surface waters may potentially affect water quality. Analysis is therefore necessary to determine if proposed impacts are significant. **Table 5.7** provides a summary of the thresholds and factors to consider when performing an analysis of impacts to this category, as described in Exhibit 4-1 of the 2020 Desk Reference.

**TABLE 5.7: SUMMARY OF SURFACE WATER RESOURCE ANALYSIS**

FAA Threshold or Factor	Effect of the Proposed Action
<b>Threshold:</b> The Proposed Action will exceed established water quality standards	Coverage under an ADEM Construction Stormwater General permit would be obtained for the proposed action. Upon completion of construction, all exposed soils would be stabilized with native vegetation. Water quality standards would be maintained.
<b>Threshold:</b> The Proposed Action would contaminate public drinking water supply and public health may be affected	Coverage under an ADEM Construction Stormwater General permit would be obtained for the proposed action. No effects to the public drinking water supply would be generated.
<b>Factor:</b> Natural and beneficial water resource values will be substantially diminished or destroyed by effects from the Proposed Action	Coverage under an ADEM Construction Stormwater General permit would be obtained for the proposed action. Upon completion of construction, all exposed soils would be stabilized with native vegetation in order to prevent the discharge of sediment into natural water resources. No substantial impacts to water resource values are anticipated.
<b>Factor:</b> The Proposed Action would impact beneficial uses and values of surface waters so that they are appreciably diminished or can no longer be maintained. This impairment cannot be avoided or satisfactorily mitigated	Coverage under an ADEM Construction Stormwater General permit would be obtained for the proposed action. Upon completion of construction, all exposed soils would be stabilized with native vegetation in order to prevent the discharge of sediment into natural water resources. No substantial impacts to water resource values are anticipated.
<b>Factor:</b> The Proposed Action will present difficulties due to water quality impacts when obtaining a permit or authorization	The Proposed Action includes common construction activities and subsequent facilities that are designed in compliance with federal and state standards. No difficulties are anticipated in obtaining necessary permits.

*Source: Significance Thresholds and factors to consider established in FAA Order 1050.1F and FAA 2020 Order 1050.1F Desk Reference*

During the WOTUS delineation within the PSA, GMC biologists documented and mapped the surface waters within the study area. The investigation determined that there are three (3) perennial stream reaches, six (6) intermittent stream reaches, one (1) ephemeral stream reach, and three (3) ponds within the PSA. The stream channels were small, unnamed tributaries flowing south towards Little Osanippa Creek. **Figure 9.0** depicts the location of each surface water noted within the PSA. **Table 5.8** below summarizes the surface waters identified within the study area.

**TABLE 5.8: SURFACE WATERS**

Surface Waters	LF/Ac
Perennial Streams (PS)	
PS1	857.51 LF
PS2	449.32 LF
PS3	196.29 LF
Intermittent Streams (IS)	
IS1	395.95 LF
IS2	226.08 LF
IS3	194.51 LF
IS4	89.50 LF
IS5	300.98 LF
IS6	231.79 LF
Ephemeral Streams (ES)	
ES1	90.98
Ponds (P)	
P1	0.32 Ac
P2	1.98 Ac
P3	0.27 Ac

**5.11.3d Environmental Consequences of the No-Action Alternative**

The No-Action alternative will result in no construction, and will therefore not have any impacts to surface water. No further analysis would be required.

**5.11.3e Environmental Consequences of the Preferred Alternative (Alternative 3)**

The Preferred Alternative includes direct impacts to surface waters that are regulated by the USACE. The Preferred Alternative will include the placement of fill material within 360 LF of intermittent stream. This alternative also includes the filling of 0.25 acres of P1 for the construction of the entrance road as well as the draining of 2.32 acres of pond (remaining acreage

of P1, entire acreage of P2 and P3) in order to reduce the amount of open water habitat within the Runway 24 approach.

*5.11.3f Avoidance and Minimization of Surface Water Impacts*

Avoidance and minimization of impacts to surface waters will be considered, however, all impacts are likely unavoidable. Environmental impacts were considered during early design of the proposed road corridor and the preferred alternative was determined to have less impacts than Alternative 2 and Alternative 4. Environmental impacts are one of the driving factors in determining which alternative is the preferred. The appropriate permitting and mitigation will be obtained for the proposed impacts.

*5.11.3g Consultations, Permits, and Other Approvals for Surface Water Impacts*

The U.S. Army Corps of Engineers (USACE) has regulatory responsibilities pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403). Under Section 10, the USACE regulates any work in, or affecting, navigable waters of the U.S. It appears the review area does not include navigable waters of the U.S. and would not be subject to the provisions of Section 10. Under Section 404, the USACE regulates the discharge of dredged and/or fill material into waters of the U.S., including wetlands and stream.

A USACE PJD (excluding parcel 24) was issued for the PSA on September 25, 2023. The PJD is attached in Appendix C. A PJD for Parcel 24 will be obtained from the USACE once access to the property is granted. GMC does not believe the parcel contains any surface waters aside from the wetlands discussed in the previous section. The PJD is non-binding, cannot be appealed and only provides a written indication that waters of the U.S, including wetlands, may be present on-site. For purposes of computation of impacts, compensatory mitigation requirements and other resource protection measures, a permit decision made on the basis of a PJD will treat all waters that would be affected in any way by the permitted activity on the site as if they are jurisdictional waters of the U.S.

*5.11.3h Mitigation for Surface Water Impacts*

Stream impacts would require a USACE permit and the impacts would be mitigated through credit purchases from an approved mitigation bank. Based on estimated impacts, it is likely that the USACE will require a Section 404 individual permit.

## **5.9 Construction Impacts**

The No-Action alternative would not result in any construction impacts. Any construction impacts as a result of the Preferred Alternative would be temporary. These could include a) potential air quality impacts from construction equipment and dust from exposed soil; b) increases in solid waste from leftover construction materials; c) short-term noise increases from construction traffic, workers, and equipment; and d) site-specific, temporary changes in water quality as a result of soil surface exposure and sediments. The following subsections outline measures that will be implemented during construction that will allow for the reduction and/or avoidance of construction impacts.

### **5.9.1 Short-term Impacts to Air Quality**

During the construction phase, impacts such as a reduction to the local air quality can be caused by fugitive dust or emissions from heavy equipment at the project site. As a way to mitigate this impact, the contractor will implement routine dust control measures that could include periodic watering of the project site during dry conditions, providing a designated haul route that will minimize soil being carried onto the adjacent road network, and the discontinuance of all construction activities during exceptionally dry and/or high wind conditions.

### **5.9.2 Short-term Impacts as a Result of Generated Solid Waste**

This project may result in additional, temporary contributions of solid waste as a result of residual construction materials. However, the specifications and plans will require that the contractor be responsible to remove and dispose of all solid waste off of the project site in a permitted facility.

### **5.9.3 Short-term Impacts as a Result of Increased Noise Emissions**

During the construction phase, there may be increased noise emissions within and adjacent to the project site attributed to vehicles and/or heavy equipment required for the project activities. However, it is unlikely this anticipated temporary noise will adversely impact the surrounding community. Efforts will be made to minimize any potential disruptions to the local area as a result of construction noise from building activities.

### **5.9.4 Short-term Impacts to Water Quality**

The risk of soil erosion and the possible release of silt and sediment into water resources is always a potential consideration for construction projects. This most often occurs with new construction on undeveloped lands where bare soils and disturbed substrates are vulnerable to erosion from rainfall or other precipitation events. These temporary impacts can be minimized by implementing BMPs to protect water quality. These may include (but are not limited to) measures such as preserving existing vegetation, using sediment barriers, traps and settling basins, seeding/mulching or otherwise covering bare soil immediately, and installing silt fences. As such, BMPs will be outlined in the project plans and specifications and will be adhered to by the contractor, as specified by the ADEM Construction Stormwater General Permit. An Erosion and Sediment Control Plan (ESCP) and Construction Best Managements Practice Plan (CBMPP) will be prepared. The CBMPP will graphically show the location of all permanent and temporary erosion and pollution control devices that will be installed and implemented for the Preferred Action.

## **5.10 Cumulative Impacts**

Cumulative Impacts are impacts that each alternative action would have on a particular resource when added to impacts on that resource due to past, present, and reasonably foreseeable actions within a defined time and geographical area. The FAA 2020 Desk Reference provides guidance for analyzing Cumulative Impacts and indicates that cumulative impact analysis is resource specific and generally addresses environmental resources, ecosystems or human community impacts resulting from the Proposed Action. The 2020 Desk Reference also indicates that the analysis should qualitatively consider the impacts related to the

sustainability of environmental resources, ecosystems or human communities. Mitigation identified for the Proposed Action should also be documented in the cumulative analysis section for each topic analyzed. The guidance indicates that the cumulative analysis should focus on meaningful impacts, not inconsequential ones.

Possible cumulative effects were considered for each of the fourteen (14) environmental resource categories provided in FAA Order 1050.1F. **Table 5.9** provides a list of the categories that were analyzed. Part of this analysis was the potential for cumulative impacts to exceed applicable significance threshold for the resource analyzed, when considering the preferred action combined with past, present and reasonably foreseeable future actions.

**TABLE 5.9: POTENTIAL FOR CUMULATIVE IMPACTS FROM PREFERRED ALTERNATIVE**

<b>Environmental Impact Category</b>	<b>Potential Impact?</b>
Air Quality	Below significance thresholds
Biological Resources	Below significance thresholds
Climate	No
Coastal Resources	No
Department of Transportation Act, Section 4(f)	No
Farmland	No
Hazardous Materials, Solid Waste, and Pollution Prevention	Below significance thresholds
Historic, Architectural, and Archeological Resources	No
Land Use	No
Natural Resources and Energy Supply	Below Significance thresholds
Noise and Noise-Compatible Land Use	Below significance thresholds
Socioeconomics, EJ, & Children’s Environmental Health / Safety Risks	No
Visual Effects	Below significance thresholds
<b>Water Resources (<i>discrete subcategories below</i>)</b>	<b>Some</b>
<b><i>Wetlands</i></b>	<b>Yes</b>
<b><i>Floodplains</i></b>	<b>Yes</b>
<b><i>Surface Waters</i></b>	<b>Yes</b>
<i>Groundwater</i>	No
<i>Wild and Scenic Rivers</i>	No
Construction	Below significance thresholds
Cumulative Impacts	Below significance thresholds

After thorough review, the Proposed Action is not anticipated to have any significant cumulative impacts due to past actions or foreseeable future actions having impacts in the project’s geographical area within the time of the project. The only identified planned future actions in the project area are additional airport improvements within the existing airport boundary as well as potential development to the south of the runway as a result of the proposed road spur. Water Resources is the only environmental impact category that has the potential for cumulative impacts that could trigger the significance threshold for the resource analyzed.



## CHAPTER 6 CORRESPONDENCE AND PUBLIC INVOLVEMENT

### 6.1 Agency Coordination Summary

Coordination with applicable federal, state and local regulatory and commenting agencies has been initiated for this EA process. Thorough site inspections and the use of web-based investigative resources were also implemented. This combined effort assisted in the identification of potential environmental resources that may exist within the project area. **Table 6.0**, below, provides a list of agencies associated with regulation or oversight of the various environmental impact categories to be assessed. Each was sent a scoping letter requesting comments regarding the Proposed Action. A summary of any associated response is also provided. **Appendix D** contains the full correspondence submitted and the agency responses.

GMC conducted agency coordination with interested parties and received correspondence from the following.

**TABLE 6.0 AGENCY COORDINATION**

AGENCY CONTACTED	AGENCY REPRESENTATIVE	DATE OF GMC'S LETTER	DATE OF CONCURRENCE
Natural Resources Conservation Service	Danielle Smith	August 7, 2023	August 15, 2023
Department of the Interior, Fish & Wildlife Service	Bill Pearson	July 31, 2023	August 15, 2023
State Historic Preservation Office	Leanne Waller-Trupp	- Coordinated through FAA on August 8, 2023	December 15, 2023
U.S. Army Corps of Engineers	Courtney Shea	September 5, 2023	September 25, 2023

### 6.2 Public Involvement

To facilitate public participation, the EA will be made available to the public for a 30-day period. A legal notice will be published in The Valley Times-News announcing the availability of the EA. This will make the public aware of the proposed project and how to obtain further information. Hard copies of the EA will also be made available for the public to review. Any public comments received during the public review period will be included with the final EA document.

Chapter 6 will be updated after the public review period has ended and all coordination with appropriate state, local and federal agencies, as well as comments from the public, have been received. All correspondences will be included as **Appendix F**.



## CHAPTER 7 LIST OF PREPARERS

### Goodwyn Mills Cawood (GMC) – Prime Consultant

#### **April Henley, PWS**

Biologist

#### CAREER SUMMARY

April is a Biologist and Professional Wetland Scientist with more than 8 years of experience in environmental consulting for both the private and public sectors. She has managed projects throughout the Southeast navigating federal and state regulatory compliance. Her experience includes working through the NEPA process from Categorical Exclusions to Environmental Assessments; Phase I and Phase II environmental site assessments; environmental due diligence; and stream and wetland delineation, permitting, restoration, and mitigation. April has managed and participated in numerous NEPA studies and documents for the Federal Aviation Administration (FAA), the Alabama Department of Transportation (ALDOT), the United States Department of Agriculture (USDA), the Environmental Protection Agency (EPA), the U.S. Economic Development Administration (EDA), and the U.S. Department of Housing and Urban Development (HUD). April is also proficient in navigating the permitting processes for the United States Army Corps of Engineers (USACE), the Environmental Protection Agency (EPA), the Alabama Department of Environmental Management (ADEM).

#### **Rob Carlton, PWS**

Biologist

#### CAREER SUMMARY

Rob is a senior biologist with 16 years of multi-disciplinary environmental experience. He obtained his professional wetland scientist certification in 2010 and achieved his certification as a qualified airport wildlife biologist in 2016. His vast experience includes wetlands delineating and permitting, constructed wetlands and bio-retention systems, stream restoration, mitigation banking, water quality analysis, environmental site assessments, erosion control, threatened and endangered species surveys, U.S. Army Corps of Engineers (USACE) permitting, National Environmental Policy Act (NEPA) coordination and underground storage tank investigations and closures. Rob is proficient in performing legal research, onsite investigations, historical review, interviews and preparation of written reports, and has performed numerous NEPA studies for various federal and state agencies. He also has experience in groundwater monitoring, well drilling, sampling and abandonment, including soil borings and soil sampling.

## APPENDICES

## APPENDIX A



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Alabama Ecological Services Field Office  
1208 B Main Street  
Daphne, AL 36526-4419  
Phone: (251) 441-5181 Fax: (251) 441-6222  
Email Address: [alabama@fws.gov](mailto:alabama@fws.gov)

In Reply Refer To:  
Project Code: 2023-0108539  
Project Name: Lanett Airport Road

July 25, 2023

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Project consultation requests may be submitted by mail or email ([Alabama@fws.gov](mailto:Alabama@fws.gov)). **Ensure that the Project Code in the header of this letter is clearly referenced in any request for consultation or correspondence submitted to our office.**

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered

species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

---

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. **Ensure that the Project Code in the header of this letter is clearly referenced with any request for consultation or correspondence about your project that you submit to our office.**

Attachment(s):

- Official Species List

## **OFFICIAL SPECIES LIST**

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Alabama Ecological Services Field Office**

1208 B Main Street

Daphne, AL 36526-4419

(251) 441-5181

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## PROJECT SUMMARY

Project Code: 2023-0108539

Project Name: Lanett Airport Road

Project Type: Airport - New Construction

Project Description: The Lanett Municipal Airport intends to construct a new entrance road as well as acquire and clear several parcels within the Runway 24 approach and departure surfaces. A perimeter fence would be installed along the interior of the new entrance road. Additional areas of clearing within the proposed fence would also be included as part of the project in order to minimize the amount of wildlife habitat within the fence.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@32.8181883,-85.22248355050272,14z>



Counties: Chambers County, Alabama

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## ENDANGERED SPECIES ACT SPECIES

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

### BIRDS

NAME	STATUS
Whooping Crane <i>Grus americana</i> Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/758">https://ecos.fws.gov/ecp/species/758</a>	Experimental Population, Non- Essential

### REPTILES

NAME	STATUS
Alligator Snapping Turtle <i>Macrochelys temminckii</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/4658">https://ecos.fws.gov/ecp/species/4658</a>	Proposed Threatened

### INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

### CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

---

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.



## **IPAC USER CONTACT INFORMATION**

Agency: Goodwyn Mills Cawood, LLC  
Name: April Henley  
Address: 2660 Eastchase Lane, Suite 200  
City: Montgomery  
State: AL  
Zip: 36117  
Email: april.henley@gmcnetwork.com  
Phone: 3342713200

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**APPENDIX B**



**A CULTURAL RESOURCE ASSESSMENT  
OF THE LANETT MUNICIPAL AIRPORT ENTRANCE ROAD  
AND OBSTRUCTION REMOVAL PROJECT,  
CHAMBERS COUNTY, ALABAMA**

prepared for  
Goodwyn Mills Cawood LLC  
**2660 East Chase Lane, Suite 200  
Montgomery, AL 36117**

by  
Tray G. Earnest, RPA  
Principal Investigator

August 4, 2023  
Revised October 18, 2023



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## I.0 Introduction

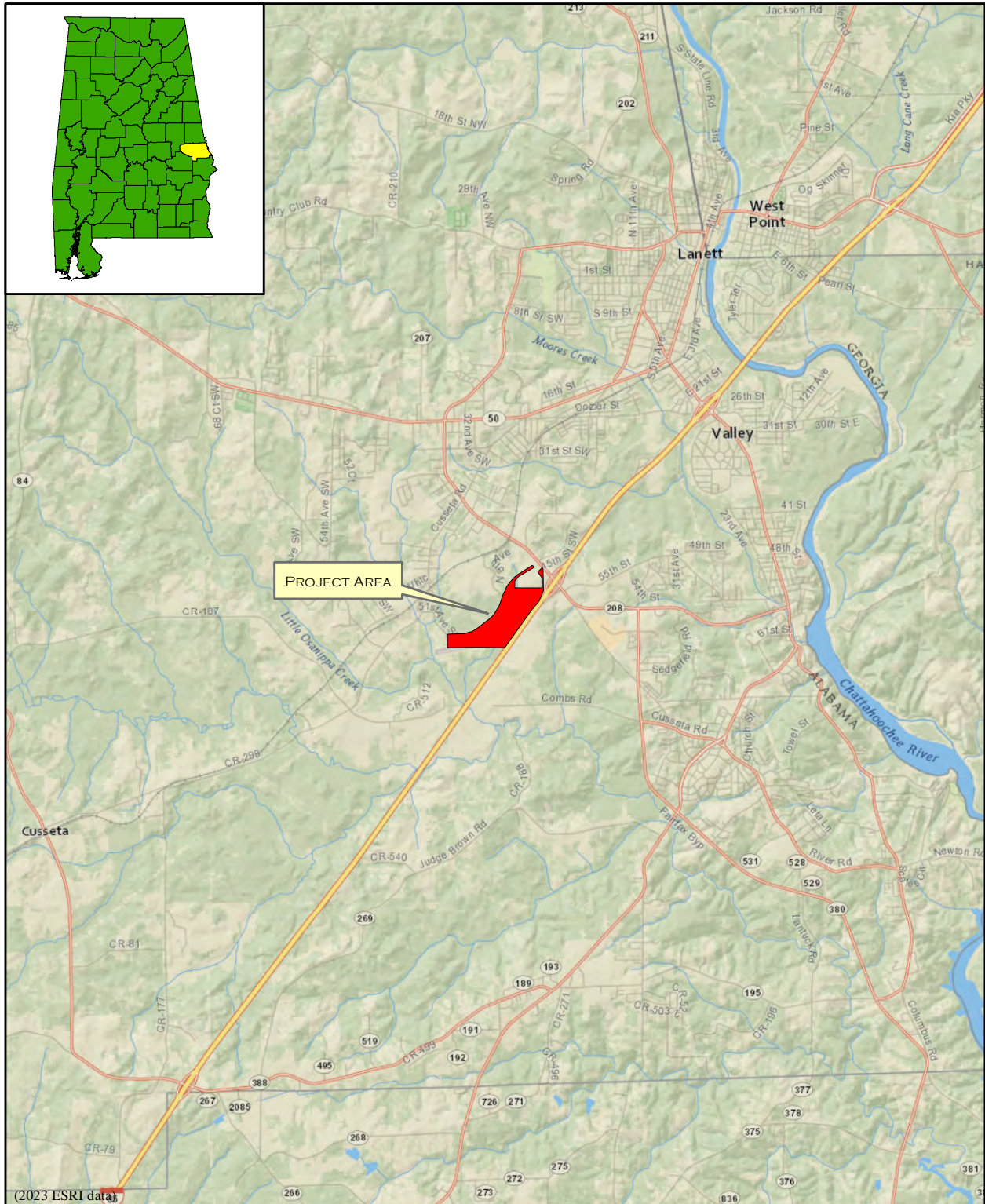
This report presents the results of a cultural resource assessment conducted within the boundaries of a proposed airport improvement project in Lanett, Chambers County, Alabama (Figure 1.1). This assessment was conducted on April 28, 2023 at the request of the Goodwyn Mills Cawood LLC with Section 106 of the *National Historic Preservation Act of 1966*, as amended, *36 CFR Part 800: Protection of Historic Properties* and the *National Environmental Policy Act of 1969*, with the Federal Aviation Administration serving as lead agency.




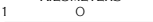

The purpose of this assessment was determining if historic properties would be affected by constructing new access roads and removing potential obstructions within the project area boundaries. Historic properties include cultural resources such as archaeological sites, architectural resources (standing structures and historic districts), objects, and traditional cultural properties (TCPs) that meet specific levels of significance. The term ‘historic properties’ is typically used at the Federal level to define cultural resources and TCP’s that meet eligibility criteria for inclusion on the National Register of Historic Places (NRHP).

Field investigations were conducted by Tray G. Earnest, principal investigator. The principal investigator is a Registered Professional Archaeologist (RPA, license no. 1534). Historic structure evaluations were conducted by Laura Lee Corbett, architectural historian (Appendix B). Both individuals possess credentials that meet and exceed the qualifications described in the Secretary of Interior’s (SOI) professional guidelines (*Federal Register 48:190:44738-44739*; United States Department of the Interior, 1983; Appendix A).

The project area consists of ± 193 acres located in Township 21N, Range 28E, Sections 10, 11 and 15, USGS *Lanett South, AL* quadrangle, with elevations ranging between 600-700’ AMSL (Figure 1.2). The physical area of potential effect (APE) consists of all portions of the project area. The visual APE consists of adjacent parcels due to the nature of potential future airport improvements. Assessment results indicate the proposed project will have no effect upon historic properties.

*CRA of the Lanett Municipal Airport Entrance Road and Obstruction Removal Project, Chambers County, Alabama*






<p>LEGEND:</p> <p> PROJECT AREA</p>	<p></p>	<p>MILES</p> <p></p> <p>KILOMETERS</p> <p></p> <p></p>
	<p>Author: TgE      Date: 10/17/2023</p>	<p>Figure 1.1. Project area location.</p>



*CRA of the Lanett Municipal Airport Entrance Road and Obstruction Removal Project, Chambers County, Alabama*







<p>LEGEND:</p> <p> PROJECT AREA</p> <p> ARCHAEOLOGICAL SITE</p>	<p>TG EARNEST &amp; ASSOCIATES Historic Preservation Consulting</p>	<p>0.25 MILES 0 0.25</p> <p>0.25 KILOMETERS 0 0.25</p> 
	<p>Author: TgE      Date: 10/17/2023</p>	<p>Figure 1.2. Project area with topography.</p>



*CRA of the Lanett Municipal Airport Entrance Road  
and Obstruction Removal Project, Chambers County, Alabama*



(2023 ESRI data)

<p>LEGEND:</p> <p> PROJECT AREA</p> <p> ARCHAEOLOGICAL SITE</p>	<p></p>	<p>0.25 MILES 0 0.25</p> <p>0.25 KILOMETERS 0 0.25</p> <p></p>
	<p>Author: TgE Date: 10/17/2023</p>	<p>Figure 1.3. Project area with aerial.</p>

## **2.0 Environmental Setting**

The project area is located in the Southern Piedmont Upland physiographic section (Figure 2.1). Topography consists of slopes ranging between moderate to steep that grade towards streams and wetlands. Existing conditions consisted of four primary categories: mature forest, cleared and developed airport and industrial park property, and cleared and modified private property (northeast portion of project area). Vegetation is variable in wooded portions, but generally consists of mature mixed pine/hardwood forest with sparse undergrowth. Vegetation was sparse in areas within private property. Extension portions of the original airport property have been altered as part of a 2018 runway realignment project.

Surface visibility varied, but in general was very good due to past land use impacts and eroded slopes. Exposed subsoils were common throughout the project area, especially in airport and industrial park property. Prominent upland soils include Appling gravelly sandy loam (multiple types based on slope), Cecil gravelly clay loam, severely eroded, sloping, Chewacla sandy loam, Lloyd clay loam, severely eroded, and Lloyd gravelly clay loam, severely eroded, strongly sloping (USDA 2021). All mapped soils are described as having clay subsoils within 10 cm of the surface (USDA 2023).

The characteristics of mapped upland soils suggest a low probability of encountering undisturbed soil stratigraphy, especially in light of agricultural and silvicultural land use history. Observed soils are consistent with mapped descriptions. Clay subsoils were common at the surface within previously developed areas and just under the O horizon within forested areas.



*CRA of the Lanett Municipal Airport Entrance Road  
and Obstruction Removal Project, Chambers County, Alabama*

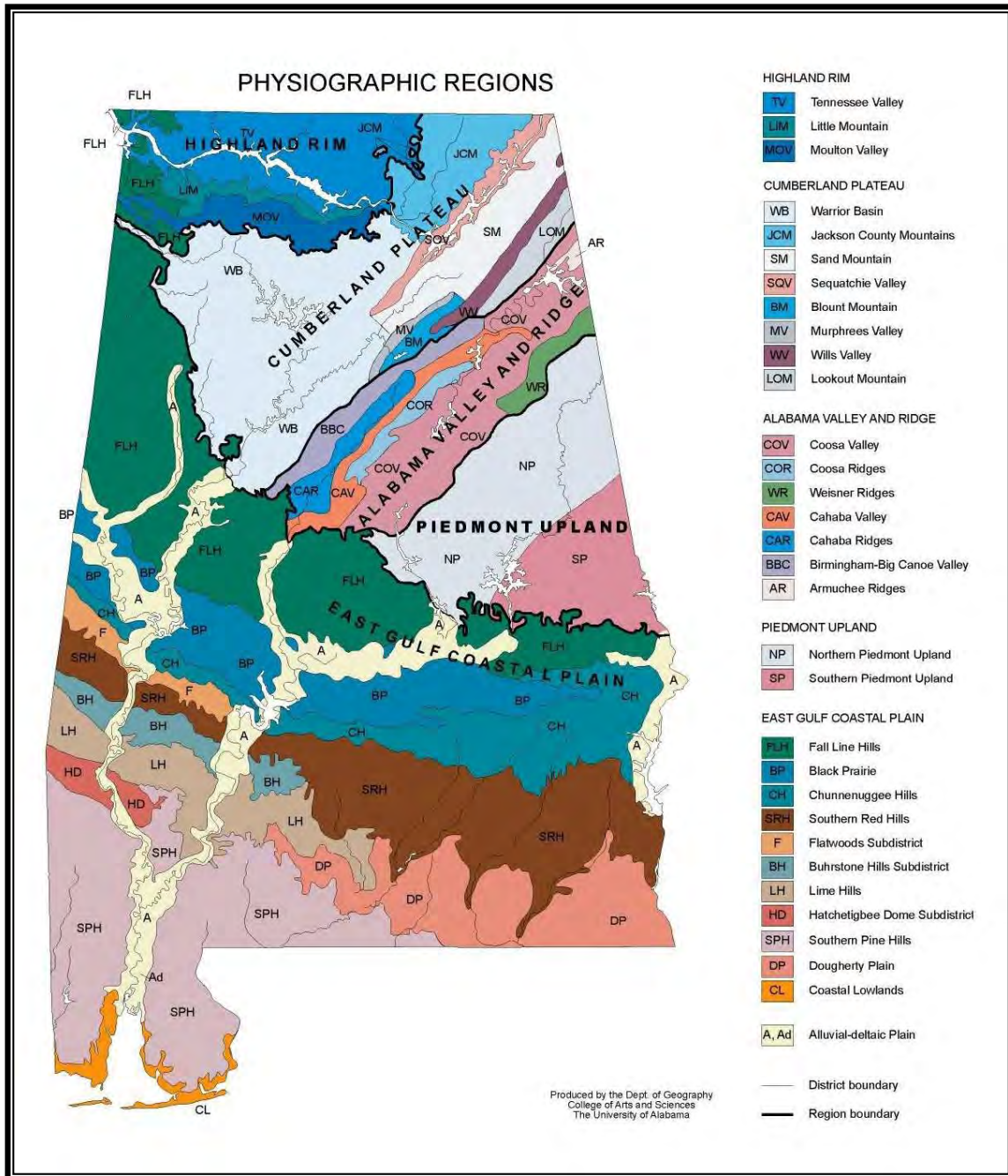


Figure 2.1. Physiographic regions of Alabama.

### **3.0 Literature and Document Search**

Background research focused on examining Federal and State databases containing information regarding archaeological sites, historic structures and historic properties within or near the study area, as well as research designed to provide a basic historical context for the study area within which results could be objectively quantified. In addition, historic maps were examined for depictions of historic roads, buildings or structures within or near the project area.

State databases containing archaeological site locations and data regarding previous surveys were examined for information pertaining to the project area. These databases are only accessible by historic preservation professionals with qualifications that meet or exceed SOI standards, and archaeological site locations from such sources are considered confidential and not for public distribution. Exclusive use is limited to the Client and designated representatives.

Determining effects to historic properties by the proposed project is the primary focus of a cultural resource assessment. An historic property (or NRHP eligible resource) is defined in the National Historic Preservation Act of 1966 (NHPA) (54 U.S.C. § 300308) as any “prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on, the National Register of Historic Places, including artifacts, records, and material remains related to such a property or resource.”

There are five (5) categories of historic properties (or cultural resources) that are used to help determine eligibility for the NRHP. These include object, site, building, structure, and district. Once a category has been identified, then it must possess significance and integrity, and meet one or more of the four (4) criteria for listing on the NRHP. The criteria for evaluation, according to the NRHP 36 Code of Federal Regulations (CFR) 60.4, must satisfy at least one of the following Eligibility Criteria:

- **Criterion A** - association with events that have made a significant contribution to the broad patterns of our history; or
- **Criterion B** - association with the lives of persons significant in our past; or
- **Criterion C** - embodiment of distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- **Criterion D** - having yielded, or likely to yield, information important in prehistory or history.

Once a property meets one or more eligibility criteria, the next test for eligibility involves evaluating integrity. Integrity is the ability of a property to convey its significance in regards to eligibility criteria. There are seven aspects of integrity for evaluating significance: *Location, Design, Setting, Materials, Workmanship, Feeling and Association*. NRHP eligibility is not possible without integrity, and a historic property must meet one or more of the seven aspects to be considered NRHP eligible. The presence of cultural resources alone does not necessarily impede a project or automatically guarantee significance unless specific conditions are met as described above.

### **3.1 Research Findings**

The following summary provides an overview of background research results for the study area:

- ***National Register of Historic Places (NRHP)***: no listings within or adjacent to the study area.
- ***Alabama Register of Historic Places*** : no listings within or adjacent to the study area.
- ***Alabama Archaeological Site File***: The Alabama Site File (ASF) database (restricted access) lists one historic cemetery and three archaeological sites within one mile of the study area (Figure 1.2). These include the following:

1Ch150 - historic cemetery

1Ch155 - NRHP ineligible 20th century historic artifact scatter.

1Ch196 - NRHP ineligible 20th century historic artifact scatter.

1Ch197 - NRHP ineligible 20th century historic artifact scatter.

Survey of a proposed industrial park included the northern access road option route for the current project and recorded site 1Ch155 (Meyer and Ryba 2002). Survey of proposed industrial park properties recorded sites 1Ch196 and 1Ch197 (Blankenship 2015). Survey of a road widening project northeast of the project area documented no cultural resources (Luis 2002). Large portions of the project area were previously surveyed during a study of airport expansion alternatives, with no cultural resources encountered (Earnest 2010).

#### ***Historic Map and Imagery Search***

Numerous historical maps and aerials were consulted for identifying cultural resources within the subject parcels. USGS topographic maps typically provide useful data on internal road networks and the location of cemeteries and structures when present. Alabama Highway Department (AHD) maps typically provide road networks and very generalized structure locations, but are useful in regards to location data for historic structures. A summary of pertinent map search results includes the following:

- 1909 Chambers County soil survey: two structures within the project area (Figure 3.1).
- 1937-38 AHD maps: no structures depicted within the project area.
- 1973 AHD map: one structure depicted within the project area (Figure 3.2).
- 1955 USGS Phenix City, AL quadrangle (1:250k): the symbol for an airport is depicted at this location. The airport symbol is not depicted on the 1958 version of this map.
- 1964 USGS *Lanett South, AL* quadrangle: the Lanett Municipal Airport and an associated hangar are depicted. No additional structures are depicted within the project area.

In summary, examination of historic maps and aerials indicates a high probability of locating historic cultural resources within the project area. However, the locations of potential historic structures have been severely impacted by both initial and more recent airport construction and realignment.



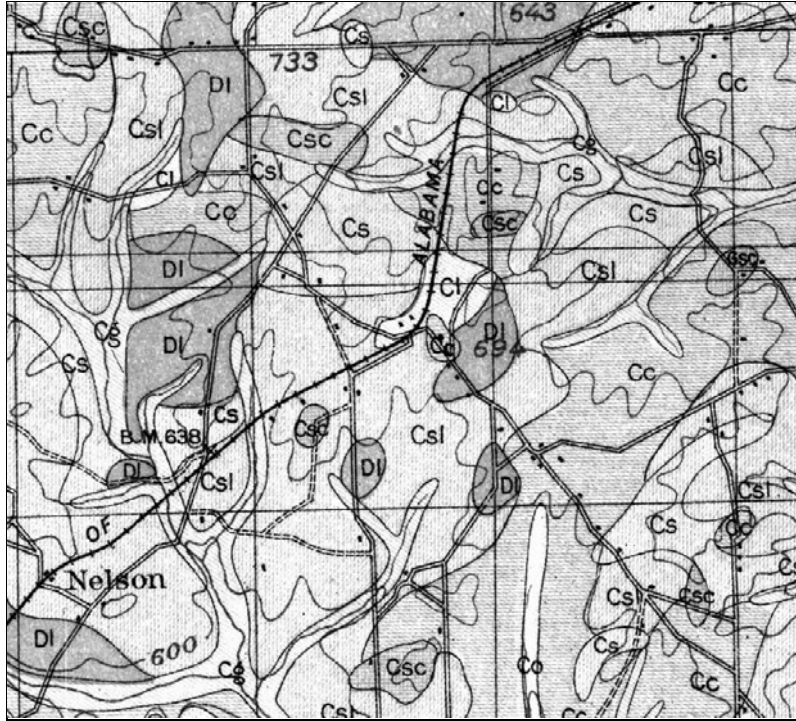


Figure 3.1. 1909 Chambers County soil survey coverage.

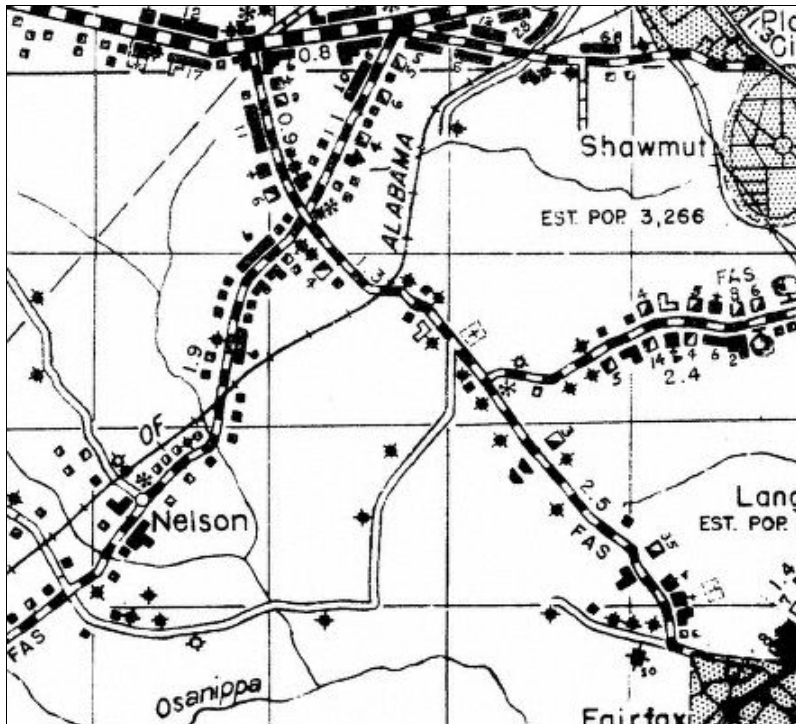


Figure 3.2. 1937 AHD map coverage.



## **4.0 Field Methods**

Primary research goals focused on locating evidence of surficial cultural resources and subsurface cultural strata, and, in the event cultural resources were encountered, determining archaeological site depth, horizontal extent, and general cultural chronology. Testing methods employed followed the guidelines set forth within the Alabama Historical Commission's *Standards and Guidelines for Survey and Testing within the State of Alabama* and Federal guidelines as per *The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR 44716)*. Historic structures were documented and evaluated according to the guidelines established in *Alabama Guidelines: Preparing Reports for Historic Architectural Resources for Section 106 Review* and the applicable National Register criteria.

Initial evaluation consisted of both a pedestrian walkover and vehicular survey of the physical APE for evidence of historic structures, historic ornamental vegetation, shell midden, and other surficial evidence of cultural resources. This initial inspection also evaluated existing conditions such as soil drainage characteristics, historic land alterations and the presumed viability of natural water sources. Defining general probability areas and an appropriate testing strategy based on topography, soils, and water sources was a key goal of the preliminary property evaluation.

Survey sub-areas were established within the project area to facilitate spatial control of assessment data and field crew deployment coordination, with sub-area boundaries based on internal road networks and natural features. Shovel test designations were based on specific survey area and transect. Temporary site numbers and isolated find designations were based on sub-area association if encountered.

Twenty-four shovel tests measuring 30-x-30 cm were excavated to the depth of clay subsoils, the water table, or one meter, and backfilled upon completion (see Section 5.0, Results). Excavated soils were sifted through portable screens composed of ¼ inch hardware cloth; each test was backfilled upon completion. Tests were conducted at 30 and 50 meter intervals depending on land use impacts and hydrology. Tests were also located judgmentally depending on elevation, soils and previous disturbance in order to improve survey coverage. Particular emphasis was placed on inspecting locations potentially corresponding to historic homes depicted on the 1908 and 1937 maps.

Representative photographs of topography and vegetation are depicted herein. Existing conditions and survey methods provided ample opportunity for discovering cultural resources. Had human remains been encountered, all investigations would have immediately ceased, followed by notification of the proper authorities. Investigations would not have resumed unless specifically authorized by the district medical examiner or the State Archaeologist.

## **5.0 Results**

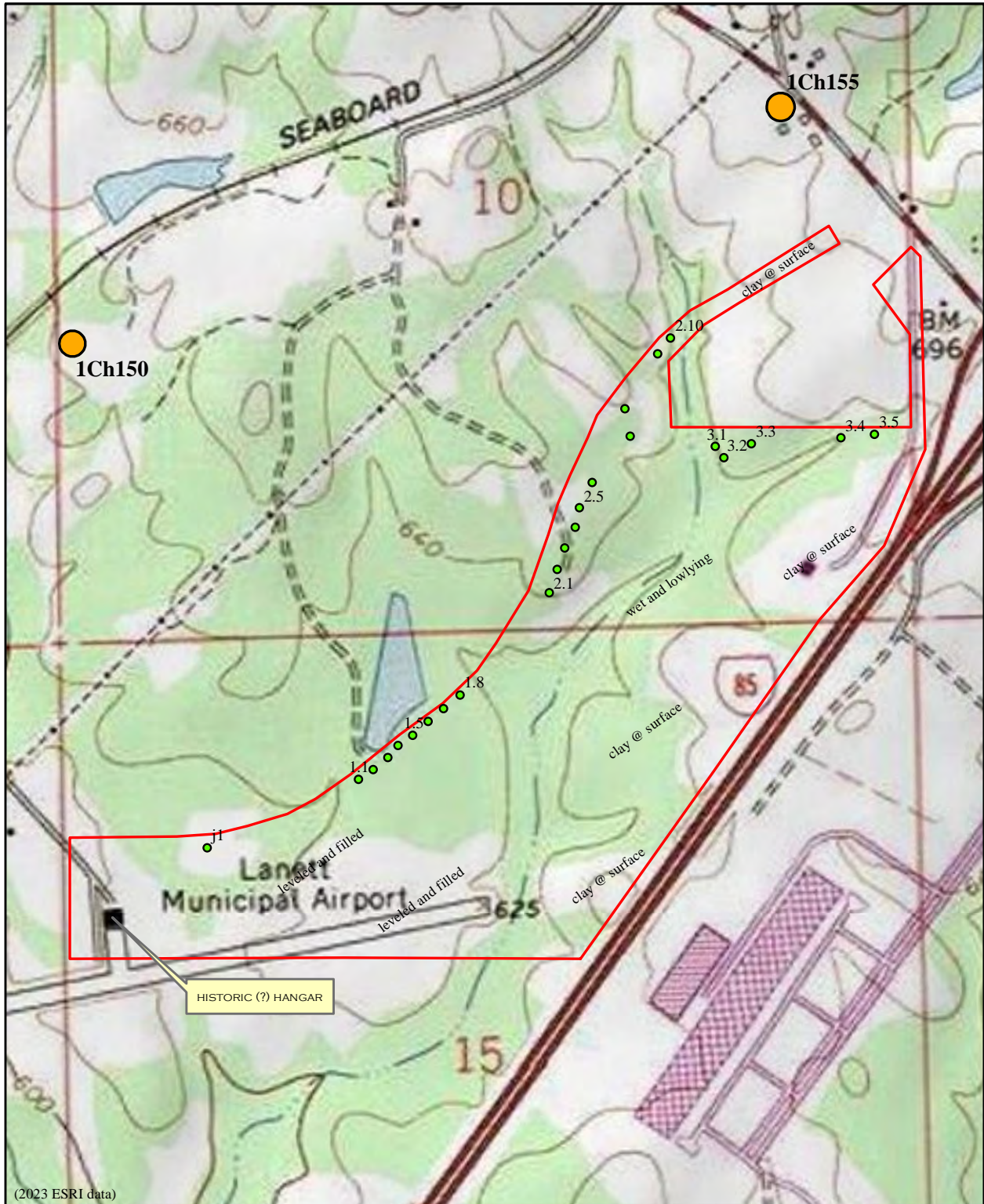
No cultural resources were observed on the surface or from shovel tests (Figures 5.1-5.2). No cultural material was encountered in the portion of the physical APE where structures are depicted on historic maps. Shovel tests produced a typical stratigraphy of brown coarse loamy sand overlying dense tan or red clay subsoils between 5-10 cm.

All buildings within the privately owned outparcels comprising the northeastern project area are of modern origin. Regarding historic structures within the airport, one maintenance hangar has the potential to be over 50 years of age (tan hangar, Figures 5.1-5.2), but historic research provides no proof of antiquity. The property appraiser lists a structure with a construction date of 1950 within the airport property, but provides no further details. The airport was dedicated in 1959 (Opelika Daily News (Opelika, AL) · Sep 25, 1959 · p. 6) along with four others in the Chattahoochee Valley, and was partially financed by Alabama's aviation gasoline tax. Associated news articles do not reference a maintenance hangar until 1976 (Opelika-Auburn News (Opelika, AL) · Apr 6, 1976 · p. 1), suggesting the possibility that the structure in question is less than 50 years of age. However, were this structure to meet the antiquity criterion, it does not appear to meet NRHP eligibility criteria to due lack of association with important events or individuals (Criteria A and B) and common architectural attributes (Criteria C). Regarding the visual APE, all additional buildings are of modern origin, and no historic properties are present within the project viewshed.



Figure 5.1. Northeast view of hangar facilities.

CRA of the Lanett Municipal Airport Entrance Road and Obstruction Removal Project, Chambers County, Alabama

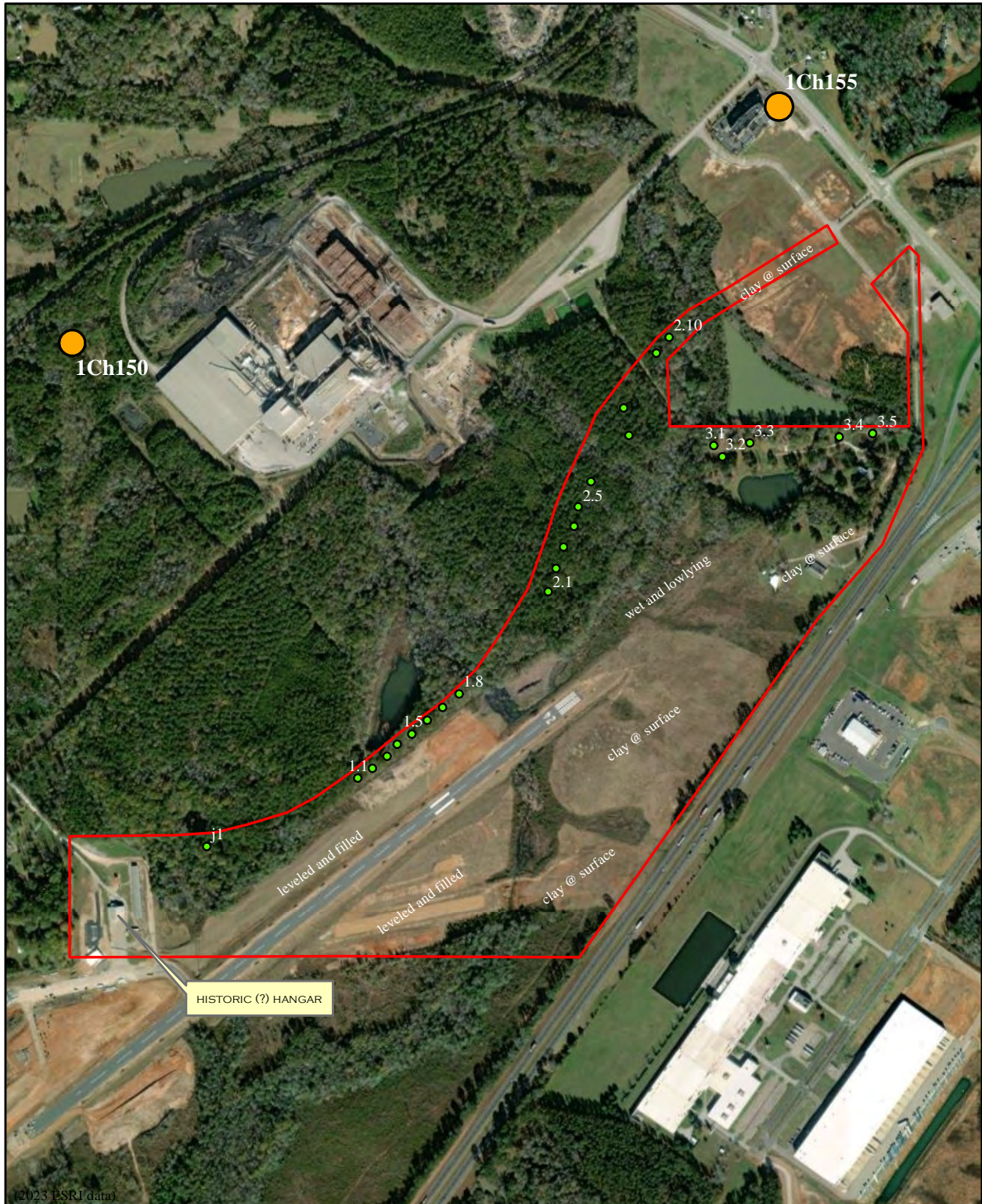


(2023 ESRI data)

<p>LEGEND:</p> <ul style="list-style-type: none"> <li><span style="color: red;">■</span> PROJECT AREA</li> <li><span style="color: yellow;">●</span> ARCHAEOLOGICAL SITE</li> <li><span style="color: green;">●</span> SHOVEL TEST NEGATIVE</li> </ul>	<p>TG EARNEST &amp; ASSOCIATES HISTORIC PRESERVATION CONSULTING</p>	<p>200 YARDS 200</p> <p>100 METERS 100</p>
<p>Author: TgE      Date: 10/17/2023</p>	<p>Figure 5.2. Key attributes with topography.</p>	



*CRA of the Lanett Municipal Airport Entrance Road and Obstruction Removal Project, Chambers County, Alabama*



(2023 ESRI data)

<p>LEGEND:</p> <ul style="list-style-type: none"> <li><span style="color: red;">■</span> PROJECT AREA</li> <li><span style="color: yellow;">●</span> ARCHAEOLOGICAL SITE</li> <li><span style="color: green;">●</span> SHOVEL TEST NEGATIVE</li> </ul>	<p>TG EARNEST &amp; ASSOCIATES HISTORIC PRESERVATION CONSULTING</p>	<p>200 YARDS 0 200</p> <p>100 METERS 0 100</p>
<p>Author: TgE      Date: 10/17/2023</p>	<p>Figure 5.3. Key attributes with aerial.</p>	





Figure 5.4. West view of airport office and hangars.



Figure 5.5. North view of pond adjacent to northern access road option corridor.



Figure 5.6. North view of eroded woods in northern access road option corridor.



Figure 5.7. West view at church/residential parcel.





Figure 5.8. South view of existing conditions in eastern residential parcel.



Figure 5.9. West view of northern access road option terminus.

## 6.0 Laboratory Methods and Collection Curation

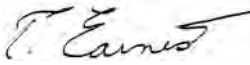
No cultural material was encountered. Associated field notes, photographs and a copy of this report will be curated with Troy University. Electronic copies of photographs are included herein.

## 7.0 Conclusions and Recommendations

The overwhelming majority of the project area has been severely impacted by erosion, industrial park site preparation and residential development, and previous airport construction and expansion. Major changes occurred to the original runway alignment and surrounding area during recent airport renovation.

No cultural resources were observed on the surface or from shovel tests. Shovel testing and visual inspection provided ample opportunities for locating cultural material had evidence of such been present. No historic properties are present within the project viewshed. One maintenance hangar may have the potential to be over 50 years of age, but even if so is considered NRHP ineligible in regards to all applicable criteria. All buildings within the project viewshed are of modern origin.

Assessment results indicate the proposed project will have *no effect* upon historic properties and should be allowed to proceed with no further archaeological investigations. While the presence of human remains is unlikely, in the event of discovery of human remains within the project area, any activities that may disturb such remains should immediately cease, followed by notification of the proper authorities. Construction should not proceed unless specifically authorized by the district medical examiner or the State Archaeologist.



---

Tray G. Earnest, RPA  
President  
TG Earnest and Associates

---

10/18/2023

Date

## References

Blankenship, Sarah A.

2015 *A Phase I Archaeological Survey of 395 Acres for the Titan Project, Valley, Chambers County, Alabama.* S.A. Blankenship.

Earnest, Tray G.

2010 *A Cultural Resource Assessment of the Proposed Lanett Airport Expansion Alternatives in Chambers County, Alabama.* TGEA, Troy, AL.

Lineback, Neal G. and Charles T. Traylor

1973 *Atlas of Alabama.* The University of Alabama Press.

Luis, Lee

2002 *Phase I Archaeological Survey, Bridge Modifications, State Route 208 Over Interstate 85, Huguley, Chambers County, Alabama.* ALDOT, Montgomery, AL.

Meyer, Catherine C. and Beth A. Ryba

2002 *A Phase I Cultural Resources Assessment of Two Proposed Industrial Properties in Chambers County, Alabama.* MRS Consultants, Tuscaloosa, AL.

National Register of Historic Places

2023 <https://npgallery.nps.gov/NRHP/> Accessed 1/15/2023.

University of Alabama

2023 <http://alabamamaps.ua.edu/historicalmaps/counties/Jefferson/Jefferson.html>. Accessed 4/16/2023.

USDA, Web Soil Survey

2023 <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>. Accessed 4/16/2023.

**Appendix A**  
**Resumes of Qualified Professionals**

**Tray G. Earnest, RPA**  
**T.G. EARNEST & ASSOCIATES**

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**Experience:**    **President, Principal Investigator**  
**TG Earnest and Associates** 2010 - present  
Providing due diligence property review, cultural resource management and historic preservation consulting throughout the Southeast.

**Principal Investigator**

Garlick Environmental Associates, Inc.- 8/2002 to 3/2010

- ❖ Phase I Cultural Resource Assessment
- ❖ Phase II/Mitigation of Southeastern Prehistoric and Historic Archaeological Sites
- ❖ Environmental Permitting, FDEP/ACOE
- ❖ Phase I Environmental Site Assessment
- ❖ Ecological Assessment / Development Feasibility Assessment
- ❖ GPS Mapping
- ❖ Wetland Delineation, FDEP/ACOE
- ❖ NEPA Site Assessment
- ❖ FCC Communications Tower Review

**Project Manager** 1992 - 2002

Troy State University 1992 to 1997, 1999 to 2002

- ❖ Highway, Pipeline, and Transmission Line Assessment, ALDOT and Private Entities
- ❖ Block Acreage Assessments, ACOE, DOD and Private Entities
- ❖ Phase II/Mitigation of Southeastern Prehistoric and Historic Archaeological Sites

**Adjunct Instructor** 2000 - 2002

- ❖ Troy State University, Department of Criminal Justice and Sociology

**Ethnographer** - 1998

- ❖ Bureau of Applied Research in Anthropology, University of Arizona

**Field Technician** - 1990-1992

- ❖ Troy State University, Various Projects

**Education:**    **MA, Applied Anthropology** - 2004  
University of South Florida, Tampa, Florida

**Bachelor of Arts, Social Science/Historic Preservation**, 1991  
Troy State University, Troy, Alabama

**ACOE Wetland Delineation Training**, 2004

**FDEP Wetland Plants Training**, 2005

**FDEP Advanced Wetland Soils Training**, 2006

**FDEP Wetland Delineation Training** 2008

**Affiliations:**    **Register of Professional Archaeologists, Pike County Chamber of Commerce**

**Appendix B**  
**State of Alabama Structure Form**





## HISTORIC BUILDING SURVEY FORM

### I. Location/Ownership

AHC Survey Number:		Form completed by:		Date:	
Property Name:					
Location/Street Address:					
City/Zip:		County:			
USGS Quad:		Township/Range/Section:			
Current Owner's Name & Contact Info (if known):					

### 2. Physical Description

Construction date:		Source:	
Alteration date:		Source:	
Architect/Builder:		Contractor:	
Physical condition: (Excellent, Good, Fair, Poor, Ruinous)		Remaining historic fabric: (High, Medium, Low)	
No. of stories:			
Historic use of property:			
Current use of property:			
Architectural style category:		Architectural style sub-category:	
Basic typology:		Basic shape:	
Basic floor plan:		Historic Construction material(s):	
Current exterior wall material(s)		Roof finish material(s):	
Main roof configuration:		Foundation material:	
Porch type:			
Window type and materials:			
Describe alterations:			
Number and type of all outbuildings: (if significant, fill out separate survey form)			
Exterior Architectural Description:			
Description of Setting:			
Historical Notes:			

### 3. Eligibility

Appears Eligible for Alabama Register:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> would contribute to a district	<input type="checkbox"/> Undetermined	
Appears Eligible for National Register:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> would contribute to a district	<input type="checkbox"/> Undetermined	
AR Criteria:	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> Undetermined
NR Criteria:	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> Undetermined
Level of Significance:	<input type="checkbox"/> Local	<input type="checkbox"/> State	<input type="checkbox"/> National	<input type="checkbox"/> Undetermined	
Justification of Eligibility/Ineligibility:					

**Appendix C**  
**Curation Agreement**

Troy, Alabama  
36082

334-670-3000

February 28, 2022

Tray G. Earnest  
TG Earnest & Associates  
207 N. Oak St.  
Troy, AL 36081

Dear Tray,

As per your request, this letter is to confirm our standing agreement with you to provide curation services to TG Earnest & Associates on an as-needed basis. As you know, we are recognized by a variety of Federal agencies as a repository meeting the standards in 36 CFR Part 79 and have formal agreements to provide curation under these guidelines to multiple federal agencies such as the Army National Guard and Natural Resources Conservation Service.

Please be advised that once a year we must be notified of all reports in which we were named as the repository. Project collections must be submitted within one calendar year of completion. Small projects may be compiled for periodic submission. The AHC survey policy specifies which materials must be curated (Administrative Code of Alabama, Chapter 460-X-9). Renewal of this agreement is contingent upon compliance.

We appreciate this opportunity to be of assistance and look forward to working with you in the future.

Sincerely,



Stephen Carmody, Director  
Archeological Research Center  
Troy University  
(334)808-6771



## APPENDIX C



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
**U.S. ARMY CORPS OF ENGINEERS, MOBILE DISTRICT**  
**600 VESTAVIA PARKWAY, SUITE 203**  
**THE SHELBY BUILDING**  
**VESTAVIA HILLS, AL 35216**

September 25, 2023

North Branch  
Regulatory Division

SUBJECT: Department of the Army File Number SAM-2011-00059-CMS, Lanett  
Municipal Airport, Chambers County, Alabama

Lanett Municipal Airport  
Attention: Richard Carter  
4445 51<sup>st</sup> Avenue SW  
Lanett, Alabama 36863

*Transmitted electronically to [rcarter@cityoflanett.com](mailto:rcarter@cityoflanett.com)*

Dear Mr. Carter:

This is in response to your request, submitted on your behalf by your agent Goodwyn, Mills, and Cawood, for a Department of the Army (DA) preliminary jurisdictional determination on a 127-acre parcel in Lanett, Chambers County, Alabama. The property is centered at Latitude 32.817692, Longitude -85.218456 as depicted on the attached figures.

Based on our review of information and wetland determination data forms your agent furnished and other desktop information available to our office, we have determined the boundary of waters of the United States (U.S.) to be accurate as shown on the attached delineation boundary figures. Please be advised that this determination reflects current policy and regulation.

Your delineation site was reviewed pursuant to Section 404 of the Clean Water Act. Section 404 of the Clean Water Act requires that a DA permit be obtained for the placement or discharge of dredged and/or fill material into waters of the U.S., including streams and wetlands, prior to conducting the work (33 U.S.C. 1344). For regulatory purposes, the U.S. Army Corps of Engineers (USACE) defines wetlands as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

Please be advised that land clearing operations involving removal of vegetation with mechanized equipment such as front-end loaders, backhoes, or bulldozers with sheer



blades, rakes, or discs; windrowing vegetation; land leveling; or other soil disturbance in areas subject to USACE jurisdiction are considered a discharge of dredged and/or fill material under our permitting jurisdiction. If future work proposed at this site includes a discharge or placement of dredged and/or fill material into waters of the U.S., a DA permit is required prior to initiating work.

Attached to this letter is a copy of the Preliminary Jurisdictional Determination (PJD) form for the above-referenced property. This PJD treats the wetlands and waters of the U.S. on the site as jurisdictional for the purposes of determining impacts and mitigation requirements. The PJD is a non-binding action and shall remain in effect unless new information or a request for an approved jurisdictional determination supporting a revision is provided to this office. Please note that since this jurisdictional determination is a preliminary, it is subject to change and therefore is not an appealable action under the USACE administrative appeal procedures defined at 33 CFR 331.

The statements contained herein do not convey any property rights, or any exclusive privileges and do not authorize any injury to property, nor shall it be construed as excusing you from compliance with other Federal, State, or local statutes, ordinances, or regulations that may affect proposed work at this site.

The delineation included herein has been conducted to identify the location and extent of the aquatic resources for purposes of the Clean Water Act for the particular site identified in this request. This delineation may not be valid for the Wetland Conservation Provisions of the Food Security Act of 1985, as amended. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should discuss the applicability of an NRCS Certified Wetland Determination with the local USDA service center, prior to starting work.

If you intend to sell property that is part of a project that requires DA authorization, it may be subject to the Interstate Land Sales Full Disclosure Act. The Property Report, required by Housing and Urban Development Regulation, must state whether or not a permit for the development has been applied for, issued, or denied by the USACE (Part 320.3(h) of Title 33 of the Code of Federal Regulations).

An electronic copy of this letter is being provided to your agent, April Henley with Goodwyn, Mills, and Cawood at [april.henley@gmcnetwork.com](mailto:april.henley@gmcnetwork.com).

We appreciate your cooperation with the Corps of Engineers' Regulatory Program. Please refer to file number **SAM-2011-00059-CMS** in all future correspondence regarding this project or if you have any questions concerning this determination.

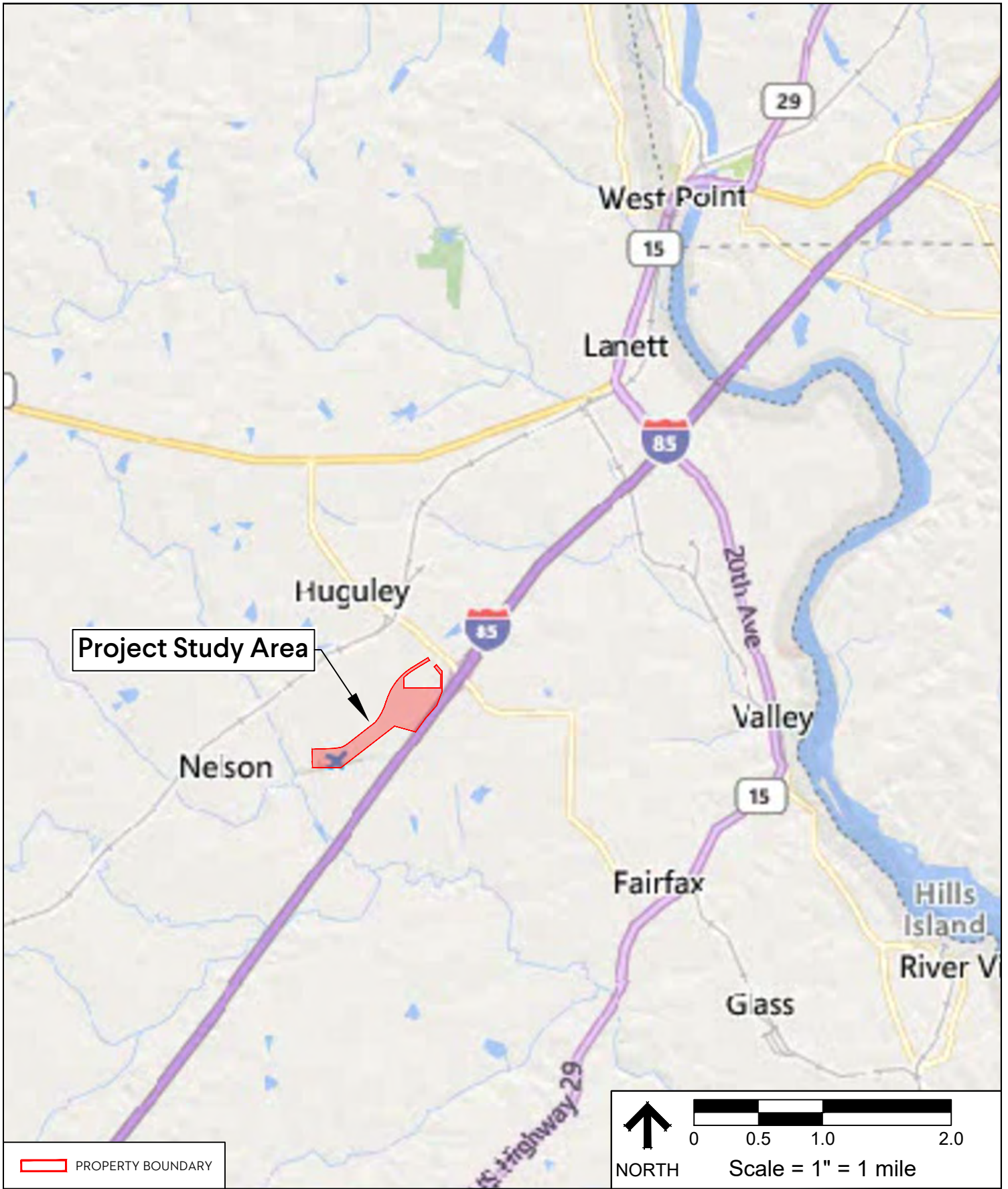
Please contact me by telephone at 205-381-8108 or by e-mail at [courtney.m.shea@usace.army.mil](mailto:courtney.m.shea@usace.army.mil) should you have any questions. For additional information about our Regulatory Program, visit our web site at <http://www.sam.usace.army.mil/Missions/Regulatory.aspx>. Please take a moment to complete our customer satisfaction survey located under the menu header on the right

side of the webpage. Your responses are appreciated and will allow us to improve our services.

Sincerely,

Courtney Shea  
Team Leader

Attachments



REF. SHEET: ESRI WORLD STREETS  
 DESCRIPTION: PRELIMINARY JURISDICTIONAL DETERMINATION

**Lanett Municipal Airport  
 Entrance Road and Improvements Project**  
 Lanett, Chambers County, Alabama

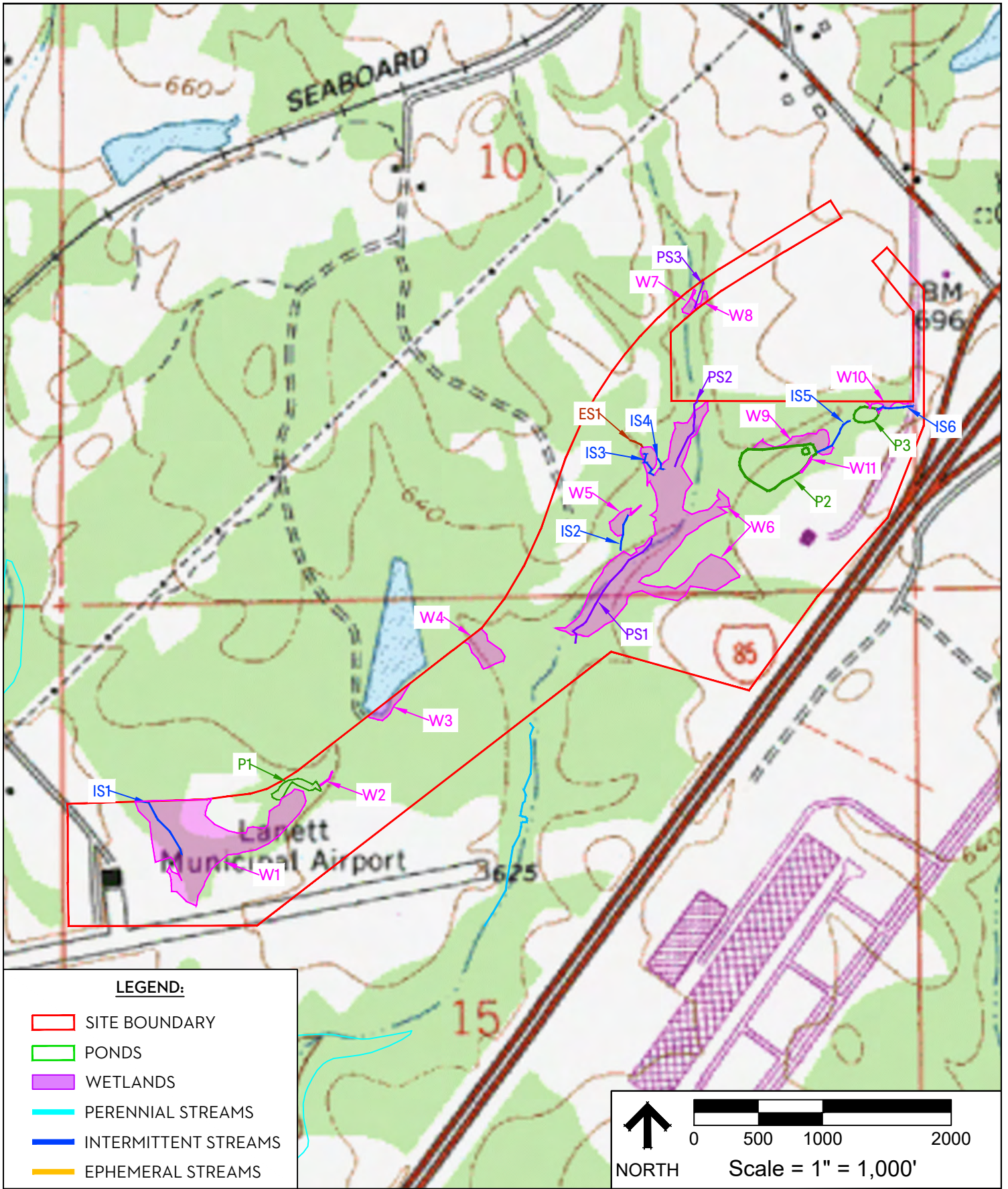
**Figure 1**

GENERAL LOCATION MAP  
 GMC # EMGM21A010  
 DATE: 08.14.23  
 DRAWN BY: AYH

2660 East Chase Lane, Suite 200  
 Montgomery, AL 36117  
 T 334.271.3200  
 GMCNETWORK.COM







REF. SHEET: LANETT SOUTH, ALABAMA QUADRANGLE MAP  
 DESCRIPTION: PRELIMINARY JURISDICTIONAL DETERMINATION

**Lanett Municipal Airport  
 Entrance Road and Improvements Project**  
 Lanett, Chambers County, Alabama

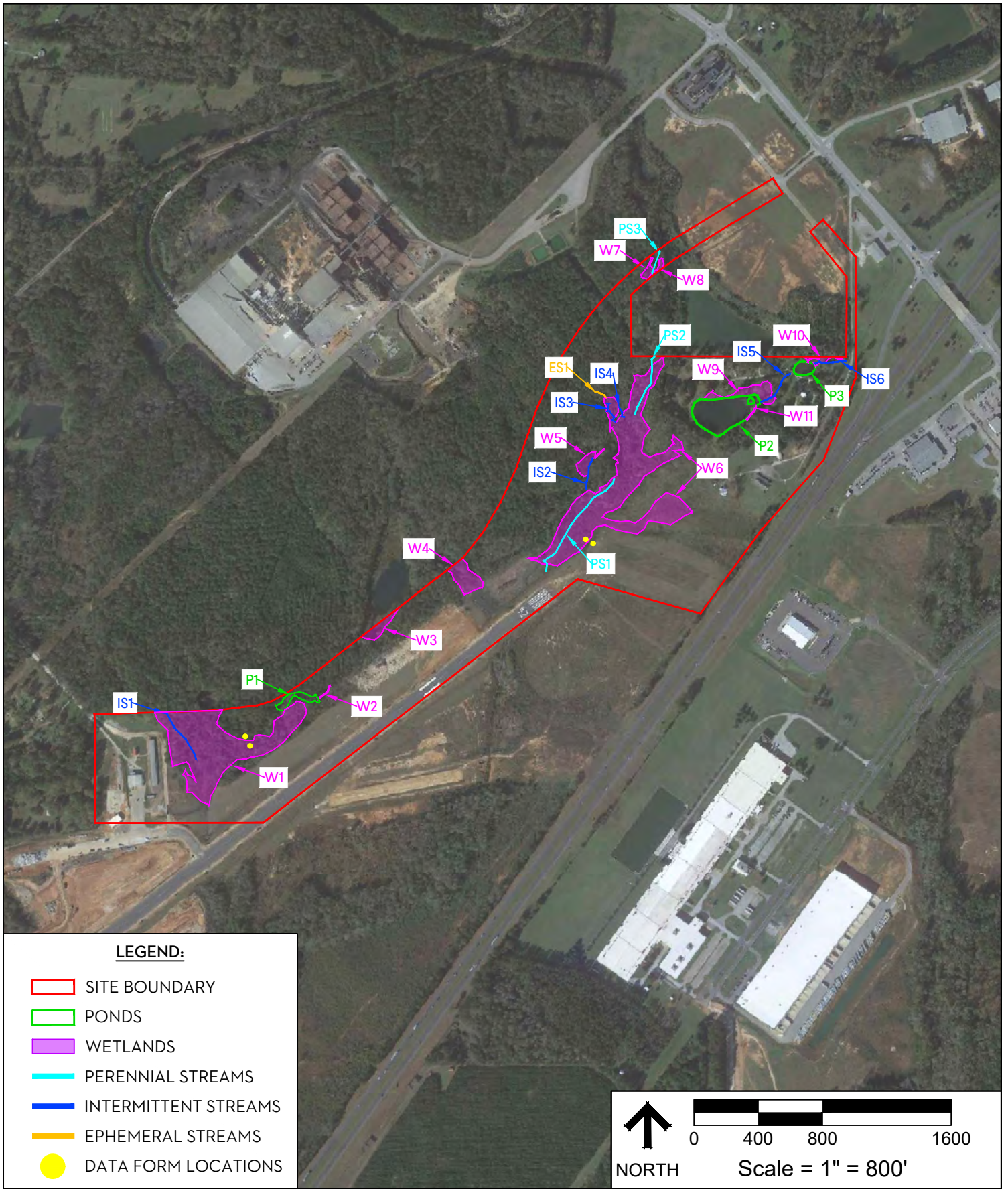
**Figure 2**

USGS QUADRANGLE MAP  
 GMC # EMGM21A010  
 DATE: 08.14.23  
 DRAWN BY: AYH

2660 East Chase Lane, Suite 200  
 Montgomery, AL 36117  
 T 334.271.3200  
 GMCNETWORK.COM







REF. SHEET: ESRI WORLD IMAGERY  
 DESCRIPTION: PRELIMINARY JURISDICTIONAL DETERMINATION

**Lanett Municipal Airport  
 Entrance Road and Improvements Project**  
 Lanett, Chambers County, Alabama

**Figure 3**

AERIAL PHOTOGRAPH  
 GMC # EMHM21A010  
 DATE: 08.14.23  
 DRAWN BY: AYH

2660 East Chase Lane, Suite 200  
 Montgomery, AL 36117  
 T 334.271.3200  
 GMCNETWORK.COM





**BACKGROUND INFORMATION**

**A. REPORT COMPLETION DATE FOR PJD:** 21-SEP-2023

**B. NAME AND ADDRESS OF PERSON REQUESTING PJD:**

Richard Carter  
 Lanett Municipal Airport  
 4445 51st Avenue Sw  
 Lanett, AL 36863  
 rcarter@cityoflanett.com

**C. DISTRICT OFFICE, FILE NAME, AND NUMBER:**

CESAM-RD-N, City of Lanett - Lanett Municipal Airport, SAM-2011-00059-CMS

**D. PROJECT LOCATION(S) AND BACKGROUND INFORMATION:**

**(USE THE TABLE BELOW TO DOCUMENT MULTIPLE AQUATIC RESOURCES AND/OR AQUATIC RESOURCES AT DIFFERENT SITES)**

State: AL County/parish/borough: Chambers County City: Lanett  
 Center coordinates of site (lat/long in degree decimal format):  
 Lat.: 32.817692° Long.: -85.218456°  
 Universal Transverse Mercator: 16  
 Name of nearest waterbody: Osanippa Creek

**E. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):**

- Office (Desk) Determination. Date: 9/21/2023
- Field Determination. Date(s): Jan, Mar, Apr 2023 (agent)

TABLE OF AQUATIC RESOURCES IN REVIEW AREA WHICH "MAY BE" SUBJECT TO REGULATORY JURISDICTION.

Site Number	Latitude (decimal degrees)	Longitude (decimal degrees)	Estimated amount of aquatic resource in review area (acreage and linear feet, if applicable)	Type of aquatic resource (i.e., wetland vs. non-wetland waters)	Geographic authority to which the aquatic resource "may be" subject (i.e., Section 404 or Section 10/404)
ES1 (2023)	32.820118	-85.221327	91 feet	Non-wetland waters	None
IS1 (2023)	32.813729	-85.231058	395 feet	Non-wetland waters	None
IS2 (2023)	32.818591	-85.221639	226 feet	Non-wetland waters	None
IS3 (2023)	32.819792	-85.221107	194 feet	Non-wetland waters	None
IS4 (2023)	32.81978	-85.220853	89 feet	Non-wetland waters	None
IS5 (2023)	32.820268	-85.217275	301 feet	Non-wetland waters	None
IS6 (2023)	32.820735	-85.216088	231 feet	Non-wetland waters	None
P1 (2023)	32.814405	-85.228319	0.32 acres	Non-wetland waters	None
P2 (2023)	32.819747	-85.218575	1.98 acres	Non-wetland waters	None
P3 (2023)	32.820618	-85.217153	0.27 acres	Non-wetland waters	None
PS1 (2023)	32.817842	-85.221843	857 feet	Non-wetland waters	None
PS2 (2023)	32.820227	-85.220328	499 feet	Non-wetland waters	None
PS3 (2023)	32.822661	-85.22086	196 feet	Non-wetland waters	None
W1 (2023)	32.813343	-85.23011	6.64 acres	Wetland	None
W10 (2023)	32.820797	-85.216281	0.13 acres	Wetland	None

<sup>1</sup> Districts may establish timeframes for requester to return signed PJD forms. If the requester does not respond within the established time frame, the district may presume concurrence and no additional follow up is necessary prior to finalizing an action.

Appendix 2 - PRELIMINARY JURISDICTIONAL DETERMINATION (PJD) FORM

W11 (2023)	32.819808	-85.217886	0.02 acres	Wetland	None
W2 (2023)	32.814412	-85.22831	0.02 acres	Wetland	None
W3 (2023)	32.815727	-85.226391	0.34 acres	Wetland	None
W4 (2023)	32.816626	-85.224456	0.71 acres	Wetland	None
W5 (2023)	32.818813	-85.221746	0.28 acres	Wetland	None
W6 (2023)	32.818256	-85.220972	9.04 acres	Wetland	None
W7 (2023)	32.822498	-85.220263	0.13 acres	Wetland	None
W8 (2023)	32.82259	-85.219991	0.07 acres	Wetland	None
W9 (2023)	32.820208	-85.217721	0.66 acres	Wetland	None

- 1) The Corps of Engineers believes that there may be jurisdictional aquatic resources in the review area, and the requestor of this PJD is hereby advised of his or her option to request and obtain an approved JD (AJD) for that review area based on an informed decision after having discussed the various types of JDs and their characteristics and circumstances when they may be appropriate.
- 2) In any circumstance where a permit applicant obtains an individual permit, or a Nationwide General Permit (NWP) or other general permit verification requiring "pre-construction notification" (PCN), or requests verification for a non-reporting NWP or other general permit, and the permit applicant has not requested an AJD for the activity, the permit applicant is hereby made aware that: (1) the permit applicant has elected to seek a permit authorization based on a PJD, which does not make an official determination of jurisdictional aquatic resources; (2) the applicant has the option to request an AJD before accepting the terms and conditions of the permit authorization, and that basing a permit authorization on an AJD could possibly result in less compensatory mitigation being required or different special conditions; (3) the applicant has the right to request an individual permit rather than accepting the terms and conditions of the NWP or other general permit authorization; (4) the applicant can accept a permit authorization and thereby agree to comply with all the terms and conditions of that permit, including whatever mitigation requirements the Corps has determined to be necessary; (5) undertaking any activity in reliance upon the subject permit authorization without requesting an AJD constitutes the applicant's acceptance of the use of the PJD; (6) accepting a permit authorization (e.g., signing a proffered individual permit) or undertaking any activity in reliance on any form of Corps permit authorization based on a PJD constitutes agreement that all aquatic resources in the review area affected in any way by that activity will be treated as jurisdictional, and waives any challenge to such jurisdiction in any administrative or judicial compliance or enforcement action, or in any administrative appeal or in any Federal court; and (7) whether the applicant elects to use either an AJD or a PJD, the JD will be processed as soon as practicable. Further, an AJD, a proffered individual permit (and all terms and conditions contained therein), or individual permit denial can be administratively appealed pursuant to 33 C.F.R. Part 331. If, during an administrative appeal, it becomes appropriate to make an official determination whether geographic jurisdiction exists over aquatic resources in the review area, or to provide an official delineation of jurisdictional aquatic resources in the review area, the Corps will provide an AJD to accomplish that result, as soon as is practicable. This PJD finds that there "may be" waters of the U.S. and/or that there "may be" navigable waters of the U.S. on the subject review area, and identifies all aquatic features in the review area that could be affected by the proposed activity, based on the following information:

<sup>1</sup> Districts may establish timeframes for requester to return signed PJD forms. If the requester does not respond within the established time frame, the district may presume concurrence and no additional follow up is necessary prior to finalizing an action.

Appendix 2 - PRELIMINARY JURISDICTIONAL DETERMINATION (PJD) FORM

**SUPPORTING DATA. Data reviewed for PJD (check all that apply)**

Checked items should be included in subject file. Appropriately reference sources below where indicated for all checked items:

- Maps, plans, plots or plat submitted by or on behalf of the PJD requestor:  
Map: Figures in GMC report dated 9/5/2023:location map, USGS Quad map with delineation, aerial with delineation, FEMA, soil survey\_.
- Data sheets prepared/submitted by or on behalf of the PJD requestor.
  - Office concurs with data sheets/delineation report.
  - Office does not concur with data sheets/delineation report. Rationale: \_\_\_\_\_.
- Data sheets prepared by the Corps: \_\_\_\_\_.
- Corps navigable waters' study: \_\_\_\_\_.
- U.S. Geological Survey Hydrologic Atlas: \_\_\_\_\_.
- USGS NHD data.
- USGS 8 and 12 digit HUC maps.
- U.S. Geological Survey map(s). Cite scale & quad name: \_\_\_\_\_.
- Natural Resources Conservation Service Soil Survey. Citation:  
<https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>
- National wetlands inventory map(s). Cite name:  
<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.
- State/local wetland inventory map(s): \_\_\_\_\_.
- FEMA/FIRM maps: \_\_\_\_\_.
- 100-year Floodplain Elevation is: \_\_\_\_\_ . (National Geodetic Vertical Datum of 1929)
- Photographs:  Aerial (Name & Date): ESRI\_.
- or  Other (Name & Date): \_Agent's photos Jan, Mar, Apr 2023
- Previous determination(s). File no. and date of response letter: \_\_\_\_\_.
- Other information (please specify): \_\_\_\_\_.

**IMPORTANT NOTE: The information recorded on this form has not necessarily been verified by the Corps and should not be relied upon for later jurisdictional determinations.**

\_\_\_\_\_  
Signature and date of Regulatory staff member completing PJD

\_\_\_\_\_  
Signature and date of person requesting PJD (REQUIRED, unless obtaining the signature is impracticable)<sup>1</sup>

<sup>1</sup> Districts may establish timeframes for requester to return signed PJD forms. If the requester does not respond within the established time frame, the district may presume concurrence and no additional follow up is necessary prior to finalizing an action.

**APPENDIX D**

August 15, 2023

Goodwyn Mills Cawood  
Sean Rice  
sean.rice@gmcnetwork.com

Re: Lanett Municipal Airport Improvements T-21-N, R-28-E, Sections 15, and 10

Sean Rice,

This letter is in response to a request for comment on *Lanett Municipal Airport Improvements* project *Chambers County, AL*. This project is *in an area that meets the definition for urban development* and is therefore exempt from the Farmland Protection Policy Act (FPPA) per activities listed below:

Activities not subject to FPPA include:

- \* Federal permitting and licensing
- \* Projects planned and completed without the assistance of a Federal agency
- \* Projects on land already in urban development or used for water storage
- \* Construction within an existing right-of-way purchased on or before August 4, 1984
- \* Construction for national defense purposes
- \* Construction of on-farm structures needed for farm operations
- \* Surface mining, where restoration to agricultural use is planned
- \* Construction of new minor secondary structures such as a garage or storage shed.

Erosion and sediment control measures should be implemented and maintained during the construction phases of this project to protect land, water, and other related resources. Plans for construction should include sediment basins/traps and other erosion control practices, including coverage of bare soil as soon as possible by temporary/permanent vegetative and/or physical structures. If you have any questions, contact me at 334-658-4145 or [danielle.smith@usda.gov](mailto:danielle.smith@usda.gov).

Thanks in Advance,

***Danielle Smith***  
**Resource Soil Scientist**  
**USDA-NRCS Alabama**





# ALABAMA HISTORICAL COMMISSION

468 South Perry Street  
Montgomery, Alabama 36130-0900

Lisa D. Jones  
Executive Director  
State Historic Preservation Officer

Tel: 334-242-3184  
Fax: 334-242-1083

December 15, 2023

Sean Rice  
Goodwyn Mills Cawood  
2660 Eastchase Lane Suite 200  
Montgomery, AL 36117

Re: AHC 23-1175  
Lanett Municipal Airport Entrance Road & Improvements Project  
Chambers County

Dear Mr. Rice:

Upon review of the additional information forwarded by your office, we concur with your agency's determination of no effect to historic properties.

Consultation with the State Historic Preservation Office does not constitute consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. If archaeological materials are encountered during construction, the procedures codified at 36 CFR 800.13(b) will apply. Archaeological materials consist of any items, fifty years old or older, which were made or used by man. These items include but are not limited to, stone projectile points (arrowheads), ceramic sherds, bricks, worked wood, bone and stone, metal, and glass objects. The federal agency or the applicant receiving federal assistance should contact our office immediately. If human remains are encountered, the provisions of the Alabama Burial Act (*Code of Alabama* 1975, §13A-7-23.1, as amended; Alabama Historical Commission Administrative Code Chapter 460-X-10 Burials) should be followed. This stipulation shall be placed on the construction plans to ensure contractors are aware of it.

We appreciate your commitment to helping us preserve Alabama's historic archaeological and architectural resources. Should you have any questions, please contact Amanda McBride at 334.230.2692 or [Amanda.McBride@ahc.alabama.gov](mailto:Amanda.McBride@ahc.alabama.gov). Have the AHC tracking number referenced above available and include it with any future correspondence.

Sincerely,

Lee Anne Hewett  
Deputy State Historic Preservation Officer

LAH/nj



July 31, 2023

2023-0108539

RECEIVED  
JUL 31 2023

SL  
BY: *Myra*

Mr. Bill Pearson  
Field Supervisor  
U.S. Fish and Wildlife Service  
1208-B Main Street  
Daphne, AL 36526

Goodwyn Mills Cawood

PO Box 242128  
Montgomery, AL 36124

T (334) 271-3200  
F (334) 272-1566

www.gmcnetwork.com

**RE: Lanett Municipal Airport  
Airport Entrance Road and Improvements Project  
Project Code 2023-0108539  
Chambers County, Alabama**

Dear Mr. Pearson:

Goodwyn Mills Cawood, LLC (GMC), on behalf of the City of Lanett, is seeking concurrence under Section 7 of the Endangered Species Act (ESA). GMC is in the process of performing an environmental review pursuant to the National Environmental Policy Act (NEPA). An Environmental Assessment is being prepared to assist decision makers with the Federal Aviation Administration (FAA) in evaluating the potential impacts of the proposed airport improvements. The project study area is located within Township-21-North, Range-28-East, in Sections 15, and 10 in Lanett, Chambers County, Alabama. The approximate center coordinates are latitude 32.818258° and longitude -85.220202° and the site is approximately ±135 acres. A species list was generated from the iPAC database and the assigned project code it referenced above. The species list is attached to this request.

The Lanett Municipal Airport intends to construct a new entrance road as well as acquire and clear several parcels within the Runway 24 approach and departure surfaces. A perimeter fence would be installed along the interior of the new entrance road. Additional areas of clearing within the proposed fence would also be included as part of the project in order minimize the amount of wildlife habitat within the fence. The project study area is depicted in the attached figures.

GMC biologists visited the study area in April, May, & July of 2022 and January of 2023 to assess the site for potential habitat for the below listed species. The project study area consists of undeveloped parcels as well as parcels containing rural residential and institutional (Faith Temple Family Worship church) development. The undeveloped areas consist of densely and sparsely forested areas as well as cleared areas. The cleared and sparsely forested areas are associated with parcels located to the north of Runway 24. The densely forested areas are located east of the runway and consist of a mix of hardwoods and planted pines. Several small streams, wetland areas, and two (2) ponds were delineated within the project study area. See attached representative photographs of the existing site conditions.

According to the U.S. Fish & Wildlife Service (USFWS) Environmental Conservation Online System (ECOS), accessed July 25, 2023, the endangered and threatened species that may occur within the project study area include:



Group	Common Name	Scientific Name	Status
Birds	Whooping Crane	<i>Grus americana</i>	Experimental Pop
Reptiles	Alligator Snapping Turtle	<i>Macrochelys temminckii</i>	Proposed Threatened
Insect	Monarch Butterfly	<i>Danaus plexippus</i>	Candidate

There are no critical habitats within the project area.

**Whooping Crane (*Grus americana*)**

The whooping crane occurs only in North America and is North America's tallest bird. The adult plumage is snowy white except for minor black and gray plumage. The whooping crane breeds, migrates, winters, and forages in a variety of wetland and other habitats, including coastal marshes and estuaries, inland marshes, lakes, ponds, wet meadows and rivers, and agricultural fields. Bulrush is the dominant vegetation type in the potholes used for nesting, although cattail, sedge, musk-grass, and other aquatic plants are common. During migration, whooping cranes use a variety of habitats; however, wetland mosaics appear to be the most suitable. For feeding, whooping cranes primarily use shallow, seasonally and semi permanently flooded palustrine wetlands for roosting, and various cropland and emergent wetlands. Several forested and emergent wetland areas are located within the project area as well as two (2) ponds. Potential habitat for the migrating whooping crane is present on site; however, no whooping cranes have been observed at the site. It is GMC's opinion that the proposed project will have no adverse effect on the whooping crane or its preferred habitat.

**Monarch Butterfly (*Danaus plexippus*)**

Monarchs lay their eggs on their obligate milkweed host plant. Milkweed is frequently found in fence rows, on roadsides, in fields, and in prairies and pastures. It is tolerant of light shade, but generally is a full sun species. In some regions, monarchs breed year-round and some, in eastern and western North America, undergo long-distance migration. The areas of full sun at the project site consist of regular mowed open spaces adjacent to the developed areas on site. No milkweed plants or monarch butterflies were noted at the site during the site visits. It is GMC's opinion that the project will have no adverse effect on the monarch butterfly or its preferred habitat.

**Alligator Snapping Turtle (*Macrochelys temminckii*)**

Weighing up to 176 pounds, *M. temminckii* is one of the heaviest freshwater turtles in the world, and the heaviest in North America. This species is found primarily in freshwaters of the southeastern United States. They are generally only found in bodies of water that flow into the Gulf of Mexico and usually do not occur in isolated wetlands or ponds. They tend to prefer deeper bends of large rivers, canals, and lakes and backwater swamps. They typically prefer places with canopy cover, overhanging trees, shrubs, dead submerged trees, and beaver dens. The water resources noted on site were all small features and did not consist of large, deep areas of water. The two (2) ponds are located in areas containing rural residential development with frequent human disturbance. It is GMC's opinion that the proposed project area has limited habitat for the alligator snapping turtle; therefore, the proposed project will have no effect on the alligator snapping turtle or its preferred habitat.



Based on the information reviewed and the habitats noted within the project area, it is GMC's opinion that none of the species listed above will be impacted by the proposed project. We are requesting your concurrence with the proposed project.

We would appreciate a response as soon as possible. If you need any further information or wish to discuss this project, please let us know. To help expedite the review process, your response can be e-mailed to [april.henley@gmcnetwork.com](mailto:april.henley@gmcnetwork.com).

Sincerely,  
GOODWYN MILLS CAWOOD, LLC

April Henley  
Biologist



U.S. Fish and Wildlife Service  
1208-B Main Street – Daphne, Alabama 36526  
Phone: 251-441-5181 Fax: 251-441-6222

No federally listed species/critical habitat are known to occur in the project area. As described, the project will have no significant impact on fish and wildlife resources. IF PROJECT DESIGN CHANGES ARE MADE, PLEASE SUBMIT NEW PLANS FOR REVIEW. We recommend use of best management practices specific to your project (See <https://www.fws.gov/project/best-management-practices-alabama>).

  
William J. Pearson  
Field Supervisor  
Alabama Ecological Services Field Office

AUG 15 2023

Date

# 3



REF. SHEET: BING STREET MAPS  
 DESCRIPTION: REQUEST FOR CONCURRENCE

### Figure 1

GENERAL LOCATION MAP  
 GMC # EMGM21A010  
 DATE: 02/27/23  
 DRAWN BY: SMR

2660 East Chase Lane, Suite 200  
 Montgomery, AL 36117  
 T 334.271.3200  
 GMCNETWORK.COM



► **Lanett Municipal Airport  
 Entrance Road and Obstruction Removal**  
 Lanett, Chambers County, Alabama



## APPENDIX E

## 1.0 EXECUTIVE SUMMARY

Goodwyn Mills Cawood, LLC (GMC), was retained by the City of Lanett (User), to conduct a Phase I ESA on three parcels totaling ±45 acres located in Lanett, Chambers County, Alabama (Figure 1). For the purpose of this report, the subject property can be described as Parcels A, B, and C (Figure 3). The center coordinates for Parcel A are latitude 32.819215° and longitude -85.222833°, for Parcel B are latitude 32.822946° and longitude -85.216058°, and for Parcel C are latitude 32.820164° and longitude -85.217824° (Figure 2). The subject property is further described as being located in Township-21-North, Range-28-East, Section 10 and Township-21-North, Range-28-East, Section 15 in Lanett, Chambers County, Alabama (Figure 2). This Phase I ESA includes a records review of state and federally listed facilities, maps, interviews, historical research, and visual observations of the subject property. A Phase I ESA does not include any testing or sampling of materials (i.e., soil, water, air, building materials, etc.).

GMC conducted an Environmental Data Resources (EDR) review for the subject property based on the All-Appropriate Inquiries (AAI) standard checklist with search distances relevant to each environmental database. This records review revealed that the subject property is not listed on any of the databases searched by EDR. The records also revealed that there are three (3) facilities listed on the State and Tribal Registered Storage Tank list, seven (7) facilities on the State and Tribal Leaking Storage Tank list, and three (3) facilities listed on the Additional Environmental Records within the minimum search distance for each database. A review of each of the listed facilities determined that none of them are considered an environmental concern in relation to the subject property.

GMC conducted a review of reasonably ascertainable historical documentation obtained from aerial photographs, fire insurance maps, USGS topographic maps, and city directories. The documentation reviewed indicated that the subject property historically consisted of cleared, agricultural land and Parcel C was not developed until at least 1992. Parcels A and B remain undeveloped. A Fire Insurance Map Report was obtained from EDR; however, no maps were identified for the subject property location or its adjoining properties. City Directories list Parcel C under Fulghum, Aubrey M and Mike & Judys Nursery in 2010. In 2005, Parcel C is listed under Beach, Rhonda A. Parcel C is listed under Fulghum, Mike in 2000. City Directories do not list Parcels A or B.

A representative of GMC conducted a site reconnaissance on March 30, 2023. On the date of the site visit, GMC conducted exterior and interior observations throughout the property. Parcel A consists of forested land with cleared land on the northern portion of the parcel. Lanett Regional Airport is located east of Parcel A. Parcel B consists of cleared land with a small ridge line of trees on the east side of the property. Parcel C consisted of residential and commercial developments and contained five (5) structures: a workshop, a single-family residence, a tractor shed, a boat house, and a storage building. A complete description the subject property can be found in Section 6.0 of this report.

On April 24, 2023 a representative of GMC interviewed Mr. Johnny Allen, Chief of the City of Lanett Fire and EMS Departments (User Representative). Mr. Allen completed an ASTM User Questionnaire for the property. He listed Clay Robinson as the Key Site Personnel and the current property owner of Parcel C, and in later correspondence, listed David Walker as the key site personnel for Parcel B. Mr. Allen was unaware of any

spills, chemical releases, or environmental cleanups that had taken place at the property. A complete description of his responses can be found in Section 4.0 of this report.

On March 30, 2023, representatives of GMC interviewed Mr. Clay Robinson, husband of Gina Waters Robinson (co-owner of Parcel C) and the current property tenant. Mr. Robinson stated that he built the hobby mechanic shop approximately 2.5 years ago. Two 330-gallon plastic totes located behind the shop were used to store the used oil from his shop. Mr. Robinson was not aware of any spills of hazardous or petroleum products associated with the site. Also on March 30, 2023, a representative of GMC interviewed Mr. Michael Fulghum, co-owner of Parcel C. Mr. Fulghum explained that he and his sister, Gina Waters Robinson, currently own the property. The property was signed over to Mr. Fulghum and his sister in approximately 2005. Mr. Fulghum stated that his father owned the property prior to 2005 and purchased it as undeveloped land in the early 1990s. The workshop was built shortly after his father purchased the property and the house was built around 1995 – 1996. He informed GMC that his father utilized the workshop to operate a roofing company and he also operated an azalea nursery on the property. Mr. Fulghum was not aware of any spills of hazardous or petroleum products associated with the site. On July 18, 2023, a representative of GMC spoke with Mr. David Walker, COO of TRNT Group (current property owner of Parcel B). Mr. Walker informed GMC that TRNT acquired the property in 2019. He stated the subject property was previously owned by the Lanier family, who intended to develop the property for commercial purposes, but the development never got going. He stated he was not aware of the storage of any hazardous materials or petroleum products, and does not believe any spills have occurred. Representatives of GMC attempted to make contact with a representative of West Fraser Timber, owner of Parcel A, but were unable to do so.

This report was completed in general accordance with the requirements established by the American Society for Testing and Materials (ASTM) E 1527-21 Standard and also meets the requirements of the AAI rule. **This Assessment has not revealed evidence of Recognized Environmental Conditions (RECs), and further investigation is not recommended at this time.**

## 1.0 EXECUTIVE SUMMARY

Goodwyn Mills Cawood, LLC (GMC), was retained by the City of Lanett (User), to conduct a Phase I ESA on a parcel totaling ±12 acres located at 4520 46<sup>th</sup> Street SW Lanett, Chambers County, Alabama (Figure 1). The subject property can be described as parcel numbers 12 17 02 10 0 001 019.000 0 & 12 17 02 10 0 001 020.001 0 (Figure 3). The center coordinates for the subject property are latitude 32.818697° and longitude -85.217794° (Figure 2). The subject property is further described as being located in Township-21-North, Range-28-East, Section 10 in Lanett, Chambers County, Alabama (Figure 2). This Phase I ESA includes a records review of state and federally listed facilities, maps, interviews, historical research, and visual observations of the subject property. A Phase I ESA does not include any testing or sampling of materials (i.e., soil, water, air, building materials, etc.).

GMC conducted an Environmental Data Resources (EDR) review for the subject property based on the All-Appropriate Inquiries (AAI) standard checklist with search distances relevant to each environmental database. This records review revealed that the subject property is not listed on any of the databases searched by EDR. The records also revealed that there are six (6) facilities listed on the State and Tribal Leaking Storage Tank list within the relevant search distance. A review of each of the listed facilities determined that none of them are considered an environmental concern in relation to the subject property.

GMC conducted a review of reasonably ascertainable historical documentation obtained from aerial photographs, fire insurance maps, USGS topographic maps, and city directories. The documentation reviewed indicated that the subject property historically consisted of forested land and cleared agricultural land with minimal changes until the church is first depicted in the 1985 aerial image. A Fire Insurance Map Report was obtained from EDR; however, no maps were identified for the subject property location or its adjoining properties. The 1984 topographic map is the first to depict a structure on the subject property. Street directories first list Faith Temple Church on the 2000 city directories.

A representative of GMC conducted a site reconnaissance on March 30, 2023. On the date of the site visit, GMC was not allowed access on the property; therefore, exterior observations were conducted from the property line and no interior observations were made. From the north property line GMC representatives noted three (3) structures on the subject property; a house, church, and a small storage structure near the house.

On July 13, 2023 a representative of GMC interviewed Mr. Johnny Allen, Chief of the City of Lanett Fire and EMS Departments (User Representative). Mr. Allen completed an ASTM User Questionnaire for the property (Appendix IV). He listed Pastor Schuck as the Key Site Personnel and the current property owner as Church of God Lanett Alabama. Mr. Allen replied “unknown” to some of the questions on the questionnaire. Mr. Allen was unaware of any spills, chemical releases, or environmental cleanups that had taken place at the property. A complete description of his responses can be found in Section 4.0 of this report.

Due to ongoing litigation, GMC was requested by the City of Lanett not to speak with the subject property's current owner.

This report was completed in general accordance with the requirements established by the American Society for Testing and Materials (ASTM) E 1527-21 Standard and also meets the requirements of the AAI rule. **GMC's inability to access the subject property or interview the owner constitutes a significant data gap; therefore, GMC is unable to determine whether or not conditions indicative of a release or threatened release are present in, on or at the subject property.**



## APPENDIX F