

CHAPTER ONE

PROPOSED ACTION

1.1 INTRODUCTION

This Environmental Assessment (EA) analyzes the potential environmental impacts of improving the Runway 6L/24R Safety Area at Burke Lakefront Airport (BKL or Airport) in Cleveland, Ohio.

An EA is a disclosure document prepared for a proposed Federal or Federally-funded action, in compliance with the requirements set forth by the Council on Environmental Quality (CEQ) in its regulations implementing the *National Environmental Policy Act of 1969* (NEPA), as amended (40 Code of Federal Regulations (CFR) 1500-1508).¹ The purpose of this EA is to investigate, analyze, and disclose the potential environmental impacts of a Proposed Action and its reasonable alternatives. Depending upon whether certain environmental thresholds of significance are exceeded or not, this EA may either lead to a Finding of No Significant Impact (FONSI) or to the preparation of an Environmental Impact Statement (EIS). This EA has been prepared in accordance with NEPA, Federal Aviation Administration (FAA) Order 1050.1E, *Environmental Impacts: Policies and Procedures*, FAA Order 5050.4B, *National Environmental Policy Act Implementing Instructions for Airport Actions*, and the FAA's Environmental Desk Reference for Airport Actions. This EA was also prepared pursuant to other laws relating to the quality of the natural and human environments including:

- The Department of Transportation Act, 49 U.S.C., § 303 (formerly Section 4(f))
- 49 U.S.C., §40114, as amended
- 49 U.S.C., §§47101, et seq.
- Executive Order 11990, Protection of Wetlands
- Executive Order 11988, Floodplain Management
- Executive Order 11593, Protection and Enhancement of the Cultural Environment
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- Federal Aviation Act of 1958 recodified as 49 U.S.C. §§40101, et seq.
- The Airport and Airway Improvement Act of 1982, 49 U.S.C. §47108, as amended
- National Historic Preservation Act, 16 U.S.C. §470(f), as amended
- 36 CFR Part 800, Advisory Council on Historic Preservation
- Archaeological and Historic Preservation Act, 16 U.S.C. §469(a)

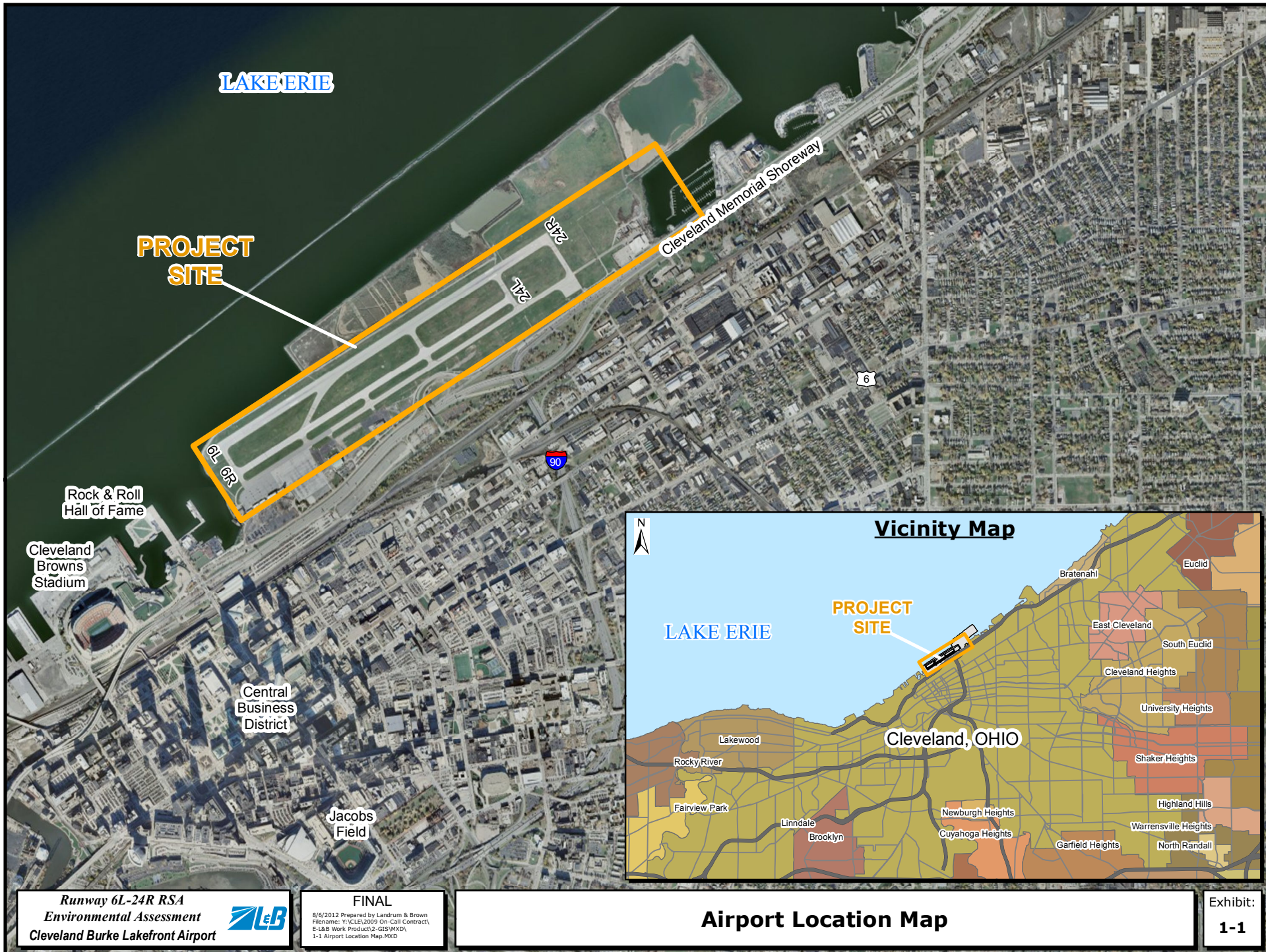
¹ P.L. 91-190, 42 U.S.C. 4321, et. seq., *National Environmental Policy Act*, 1969, Section 102(2)(c).

- Archaeological Resource Protection Act, 16 U.S.C. §470(aa)
- Farmland Protection Policy Act, 7 U.S.C. §73, and implementing regulations at 7 CFR §658
- Clean Air Act, 42 U.S.C. §§7401, et seq., and implementing regulations at 40 CFR Parts 51 and 93
- Clean Water Act, 33 U.S.C. §§121, et seq., and implementing regulations at 33 CFR §§325 and 33 CFR §336
- 33 CFR Parts 320-330, Regulatory Programs of the Corps of Engineers
- Endangered Species Act, 16 U.S.C. §661, et seq., as amended
- Coastal Zone Management Act (CZMA) as amended, 16 U.S.C. §§1451-1464.
- Other laws, regulations, and policies as applicable

1.2 BACKGROUND

BKL is owned and operated by the City of Cleveland, Department of Port Control (DPC). The Airport is located adjacent to the Lake Erie shoreline in downtown Cleveland as shown on **Exhibit 1-1, Airport Location Map**. BKL encompasses 450 acres and has two runways. The main runway, 6L/24R, is 6,198 feet long by 150 feet wide. There is an Instrument Landing System (ILS) on the Runway 24R end that permits landings with cloud ceilings as low as 300 feet above the runway end elevation and horizontal visibility of one mile or more. Runway 6R/24L is a secondary runway and is 5,197 feet long by 100 feet wide. There is no ILS for Runway 6R/24L, as a result all approaches are conducted using visual navigation aids. The Airport is a publicly owned public-use facility with an Airport Traffic Control Tower (ATCT). BKL has a terminal/administration building that accommodates general aviation (GA) operations, commercial/office uses, the International Women's Air & Space Museum, and airport administrative uses. The Airport provides on-site customs and immigration capability on an "on-call" basis. Landmark Aviation is a full-service fixed-based operator (FBO) at BKL that provides an array of aviation-related services including rental cars for visitors, pilot lounges, aircraft fueling, full FAA repair stations, chartering of aircraft, aircraft sales, aircraft management, and aircraft parking/storage. The Airport also has four flight schools (Premier Flight Academy, T&G Flying Services, Top Gun Flight Academy, and Precision Helicopter Services).

BKL is a designated GA reliever airport for Cleveland Hopkins International Airport (CLE). Reliever airports are generally described by the FAA as airports located in major metropolitan areas that divert GA activity from larger scheduled service airports; they are used by the FAA to relieve congestion at commercial service airports and to provide improved GA access to the overall community.



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The intent of a reliever airport is to provide a viable alternative to the use of the primary air carrier airport, in this case CLE, by GA users and to preserve the capacity and capability of the commercial service facility, thereby avoiding the need to undertake major runway development to meet demand. GA activity at BKL ranges from recreational flying and flight training activities to business travel. In addition to business or corporate activity, local and visiting professional sports teams use BKL to fly in and out of Cleveland on larger aircraft. BKL is also routinely used for emergency medical transport flights and donor organ transportation.

1.3 DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action, which is the subject of this EA, is proposed to be constructed on Airport-owned property and the U.S. Army Corps of Engineers (USACE) adjacent property. The elements of the Proposed Action as shown on **Exhibit 1-2, Proposed Action**, include:

Construction of a 400-foot Engineered Materials Arresting System (EMAS) bed on Runway End 6L

EMAS consists of crushable concrete blocks which are designed to stop aircraft without significant damage to the aircraft or injuries to passengers. A standard EMAS provides a level of safety that is generally equivalent to a full runway safety area (RSA) built to the dimensional standards in AC 150/5300-13, Airport Design. It also provides an acceptable level of safety for undershoots.² A portion of the RSA is located over an area of Lake Erie.³

Displace landing threshold of Runway 6L 165 feet to the east

A displaced threshold is located at a point on the runway other than the designated beginning of the runway. In this case, the landing point for Runway 6L would be displaced (relocated) to a point 165 feet east of its current position.

An approximate 600-foot eastern shift and extension to Runway End 24R

A 600-foot extension of the runway to the east would be constructed to offset the reduction in runway length associated with the installation of the EMAS and the displacement of the landing threshold of Runway 6L.

² FAA Advisory Circular 150/5220-22A *Engineered Materials Arresting Systems (EMAS) for Aircraft Overruns*. 09/30/2005. (FAA Advisory Circular 150/5220-22B was released April 24, 2012 to interested industry associations to obtain comments and recommendations by June 29, 2012. AC includes new Paragraph 5, Principal Changes).

³ FAA Order 5200.8, Runway Safety Area Program, Appendix 2, paragraph 4 g. allows the FAA to consider an irregular shape to the RSA if traditional means cannot accomplish the goal of the full rectangular size.

Relocation of the Vehicle Service Road

The vehicle service road currently circles the Airport perimeter and provides access for airport operations, U.S. Department of Agriculture (USDA) wildlife management and mitigation, and the USACE. Each of the three entities uses the vehicle service road to perform their missions. Airport operations use the road to perform perimeter checks, maintenance operations, and wildlife management activities in accordance with their Part 139 certificate. The USDA uses the road as a part of their agreement with the City of Cleveland and the USACE to perform wildlife management and mitigation related to the activities associated with both the Combined Disposal Facilities and the proximity to Lake Erie. Lastly, the USACE uses portions of the vehicle service road to access the Combined Disposal Facility operation. This is the only land access to the operation. Portions of the road would require relocation or closure. See Exhibit 1-2, *Proposed Action*, for location of the following areas.

South End

Approximately 530 feet of the vehicle service road on the southwest end of the Airport would be relocated. This roadway is located adjacent to the Aircraft Rescue and Firefighting (ARFF) station.

West Side Service Road

Currently, the vehicle service road's runs the full length of Runway 6L/24R. Two areas of this road would be affected by the Proposed Action.

Area 1 (southern portion)

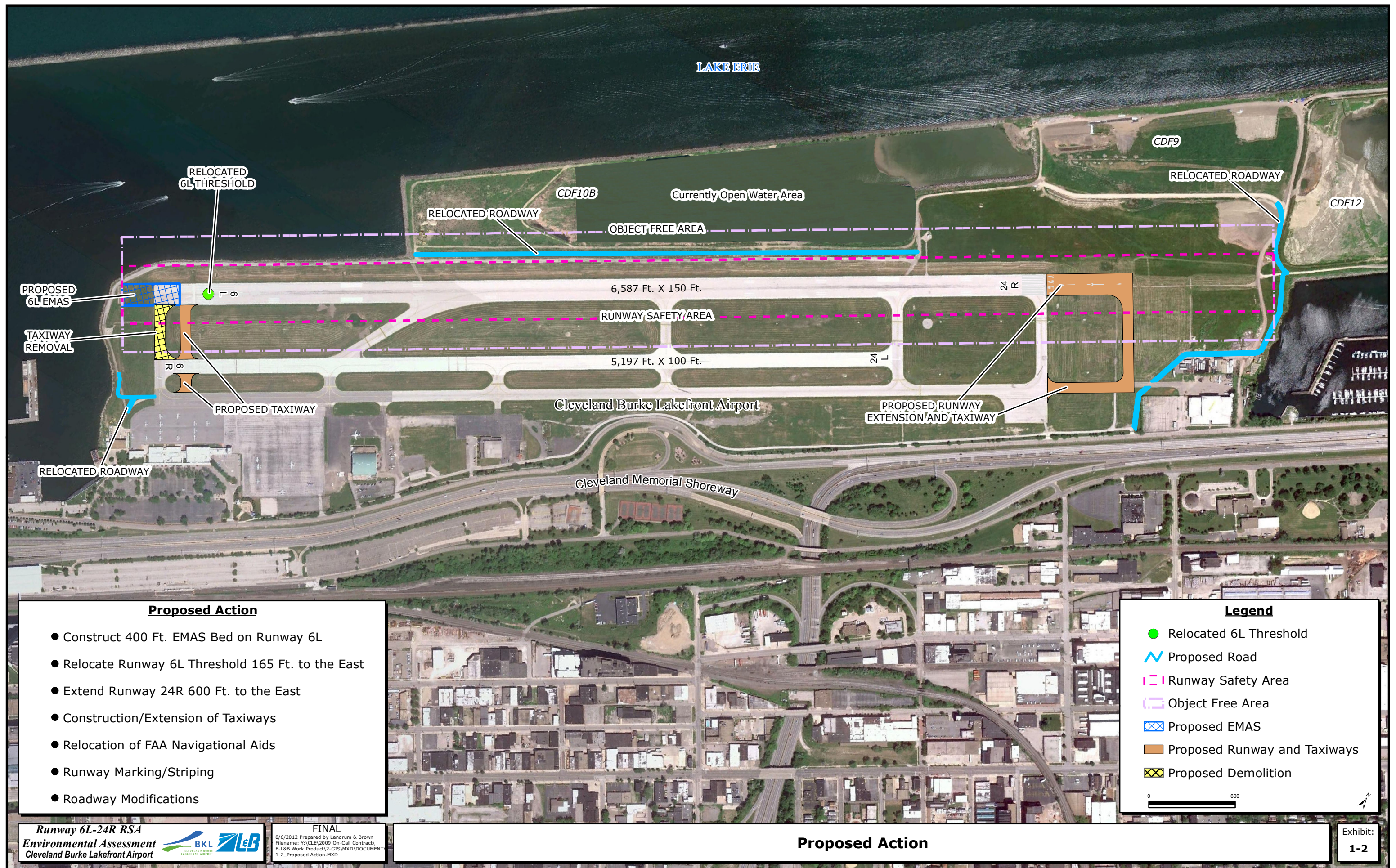
The existing southern portion of the perimeter road is adjacent to Lake Erie. There is no land available directly northwest of the existing road. It is proposed the existing road would remain as it is today, if removal is deemed unacceptable from an airport operations, wildlife management, and safety aspect.

Area 2 (middle portion)

Approximately 3,480 feet of the vehicle service road next to the confined disposal facilities (CDF) Dike 10B would be relocated. The vehicle service road would be relocated into the current storm water drainage area along the south perimeter of CDF Dike 10B. The storm water functions of the drainage ditch would be reconstructed as part of the road relocation.

North End

Approximately 2,200 feet of the vehicle service road on the east side of the Airport by the former Aviation High School and CDF Dike 12 would also need to be relocated. A portion of this roadway would still be located in the object free area (OFA) and would need a modification to standards from the FAA.



Proposed Action

- Construct 400 Ft. EMAS Bed on Runway 6L
- Relocate Runway 6L Threshold 165 Ft. to the East
- Extend Runway 24R 600 Ft. to the East
- Construction/Extension of Taxiways
- Relocation of FAA Navigational Aids
- Runway Marking/Striping
- Roadway Modifications

Legend

- Relocated 6L Threshold
- ~ Proposed Road
- Runway Safety Area
- Object Free Area
- Proposed EMAS
- Proposed Runway and Taxiways
- Proposed Demolition

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Connected Actions

The following elements are considered connected actions of the Proposed Action and are also shown on Exhibit 1-2, *Proposed Action*. Connected actions as defined in FAA Order 5050.4B Paragraph 905 (1) includes actions that are closely related to the Proposed Action and cannot or will not occur unless the Proposed Action is implemented. These connected actions include, construction/extension of taxiways, relocation of existing FAA Navigational Aids (NAVAIDS)⁴ (including the Runway End 6L Runway end identifier lights (REILS), automated surface observing system (ASOS), evaluation and amendments to any necessary flight procedures, and the addition of in-ground runway lights in the shift/extension), and new runway marking/stripping.

1.4 PROPOSED FEDERAL ACTION

The Proposed Action constitutes a modification to the Airport Layout Plan (ALP), environmental evaluation for Federal funding from the Airport Improvement Program, flight procedures, and modifications to various navigational aids which requires FAA approval, consistent with the environmental disclosures within this EA.

The need for Federal approval triggers the requirement for an environmental review in accordance with NEPA⁵. This EA is intended to provide an evaluation sufficient for the FAA to determine whether the Proposed Action would have adverse impacts significant enough to require the preparation of an EIS; or, if the need for an EIS is not indicated, a FONSI would be issued by the FAA.

1.5 SCOPING AND EARLY COORDINATION

The DPC, in cooperation with the FAA, completed a number of scoping activities to determine the range of issues to be analyzed, and to what magnitude they were to be treated in this EA. These activities included:

- Early written coordination with Federal, State, and local resource agencies;
- Conducting an agency scoping meeting; and
- Follow up discussions with specific agencies.

⁴ The existing Runway End 6L and Runway End 24R visual approach slope indicator (VASI) lights on the side of the runway threshold that provides visual descent guidance information during the approach will be replaced as part of a separate FAA project. The VASIs will be replaced by a Precision Approach Path Indicator (PAPI) which consists of four sets of lights in a line perpendicular to the runway, usually mounted to the left side of the runway. These have a similar purpose to the VASI, but have additional lights to show the pilot the glide slope for the aircraft.

⁵ *National Environmental Policy Act of 1969 (NEPA)*; Pub.L. 91-190, U.S. Statute at Large, Volume and Page (83 Stat. 852) (January 1, 1970); codified as Title 42 U.S. Code §4321-4347; as amended 42 U.S. Code §4371 et seq.

In an effort to identify potential issues associated with the Proposed Action, a coordination letter was mailed to key agencies responsible for resource protection and public policy. The letter requested responses from Federal, State, and local agencies which might have information pertaining to natural and human resources and their locations within the study area. A copy of the coordination letter DPC sent out is included in **Appendix A, *Coordination and Comments***.

The DPC and the FAA conducted an Agency Scoping Meeting at 9:30 a.m. on March 7, 2012, at BKL. Members of the DPC, FAA, and the EA consultant team discussed the Proposed Action and were available to respond to questions and issues. Copies of sign-in sheets and other meeting materials for the Agency Scoping Meeting are also included in Appendix A.

The DPC and the FAA also conducted follow up discussions with specific agencies. See Appendix A, *Coordination and Comments* for all scoping comments received and how they were addressed in this EA.

1.6 PUBLIC WORKSHOP AND HEARING

A public information workshop and public hearing were held on September 5, 2012 following the publication of the Draft EA at the Burke Lakefront Airport. The Public Workshop took place from 3:00 p.m. until 6:00 p.m. The format included an open house style workshop with presentation boards and project staff available to answer questions; and a private comment area for individual comments to be made and recorded by a court reporter. The City of Cleveland published a Notice of Availability and Public Hearing in the Plain Dealer on August 6, 2012. See Appendix A, *Coordination and Comments* for the notice, public workshop meeting materials, and the comments received at the public hearing.

1.7 COMMENTS ON THE DRAFT EA

The Draft EA was made available to the public on August 6, 2012. Comments on the Draft EA were accepted until the close of the official comment period on September 12, 2012, a period of 38 days from the publication of the Draft EA. Comments were received on the Draft EA from Federal, state, and local agencies as well as the public. They included emails, letters, and oral testimony provided at the September 5, 2012 public workshop and public hearing. A response was prepared for all substantive comments received on the Draft EA. See Appendix A, *Coordination and Comments*. No significant or substantial issues were identified in any of the comments received on the Draft EA document.