FINAL ENVIRONMENTAL ASSESSMENT
for the
Valdosta Regional Airport (VLD) General Aviation Area Improvements

Prepared for:
Valdosta-Lowndes County Airport Authority
1750 Airport Rd Suite 1
Valdosta, GA 31601

Prepared by:
SES Energy Services LLC
3550 St Johns Bluff Road South
Jacksonville, FL 32224

This Environmental Assessment becomes a federal document when evaluated, signed, and dated by the responsible FAA Official

Catherine Brown — 04/20/2023

Responsible FAA Official — Date

Final

Environmental Assessment for the General Aviation Area Improvements At Valdosta Regional Airport (VLD), Valdosta, GA

March 2023

Lead Agency:	Federal Aviation Administration
Cooperating Agency:	N/A
Title of Proposed Action:	Environmental Assessment for the General Aviation Area Improvements for VLD
Location:	Lowndes County, Georgia

Abstract

This Environmental Assessment (EA) has been prepared to evaluate the potential environmental impacts of proposed general aviation area improvements. Improvements include the demolition of an existing General Aviation Air Terminal (terminal building and control tower), taxilane geometry improvements along Taxiway A, existing apron improvements, construction of a Level 1 air traffic control tower (ATCT), the construction of a new General Aviation Air Terminal Building and associated improvements (including the relocation of loop road, development of a new airfield access road, and parking lot improvements). The purpose of the Proposed Action is to make general aviation area improvements to comply with current airfield safety regulations and restrictions as outlined in 49 CFR Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace* (2010) and Advisory Circular (AC) 150/5300-13B, *Airport Design*. The project is needed due to the age and demonstrated maintenance issues associated with the existing general aviation air terminal building and its position within the Valdosta Regional Airport (VLD) building restriction line (BRL).

This EA was prepared for the Valdosta-Lowndes County Airport Authority in accordance with National Environmental Policy Act of 1969 (NEPA; 42 United States Code [USC] 4321 et seq.), Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Part 1500 et seq., as revised in May 2022), the US Department of Transportation (DOT) regulations (Order 5610.1C, *Procedures for Considering Environmental Impacts*), and the Federal Aviation Administration (FAA) Regulations (Order 1050.1F, *Environmental Impacts: Policies and Procedures* and Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*).

TABLE OF CONTENTS

List of Figures

List of Tables

Appendices

ACRONYMS AND ABBREVIATIONS

AC	Advisory Circular
ACHP	Advisory Council on Historic Preservation
ALP	Airport Layout Plan
ARFF	Airport Rescue and Firefighting Facility
ATCT	air traffic control tower
BMP	best management practice
BRL	building restriction line
CAA	Clean Air Act of 1970
CATEX	Categorical Exclusion
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
CWA	Clean Water Act of 1972
CZMP	Coastal Zone Management Program
DOT	United States Department of Transportation
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
EPD	Environmental Protection Division
ESA	The Endangered Species Act of 1973
FAA	Federal Aviation Administration
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GA	Georgia
GHG	greenhouse gases
GSASP	Georgia Statewide Aviation System Plan
JD	jurisdictional determination
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NOA	Notice of Availability
NO2	nitrogen dioxide
O3	Ground-level ozone
OSHA	Occupational Safety and Health Administration
PAR	Permanent Photographic Archival Record
Pb	lead
PM	particulate matter
RCRA	Resource Conservations and Recovery Act
FAA	Federal Aviation Administration
SO2	sulfur dioxide
VFR	Visual Flight Rules
VLD	Valdosta Regional Airport

U.S.	United States
USACE	United States Army Corp of Engineers
USC	United States Code
USFWS	United States Fish and Wildlife Service

1.0 PURPOSE AND NEED FOR ACTION

1.1 INTRODUCTION AND BACKGROUND

The Valdosta-Lowndes County Airport Authority (the Authority) proposes to make general aviation area improvements at the Valdosta Regional Airport (VLD). Improvements will include the construction of a new general aviation terminal building (herein referred to as the proposed terminal building), a new Level 1 air traffic control tower (ATCT)[1], apron expansion, taxilane geometry corrections, and new access and parking modifications at Valdosta Regional Airport (VLD). These general aviation area improvements will ensure VLD complies with current airport design standards by removing the existing general aviation air terminal[2] building (herein referred to as existing air terminal building) from the building restriction line (BRL) of Runway 18/36 and updating associated infrastructure (fencing, erosion control, grading, etc.).

This Environmental Assessment (EA) was prepared for the Authority in accordance with National Environmental Policy Act of 1969 (NEPA; 42 United States Code [USC] 4321 et seq.), Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Part 1500 et seq., as revised in May 2022), the United States (U.S.) Department of Transportation (DOT) regulations (Order 5610.1C, *Procedures for Considering Environmental Impacts*) and the Federal Aviation Administration (FAA) Regulations (Order 1050.1F, *Environmental Impacts: Policies and Procedures* and Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*). With the project being under federal authority, it is also subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966.

General aviation design regulations are established by the FAA to promote safe airport operations. Airport design is subject to guidance and regulations set forth in 14 CFR Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace* (12 August 2022), and FAA Advisory Circular (AC) 150/5300-13A, *Airport Design* (31 March 2022). Requirements for the modernization of ATCT are further outlined in FAA Order 6480.4B, *Air Traffic Control Tower Siting Process* (13 August 2018). VLD further maintains an FAA-approved Airport Layout Plan (ALP) in accordance with AC 150/5070-6B, *Airport Master Plans* (27 January 2015). ALPs are frequently used by airports to describe short- to long-term development plans to meet the future demands of an airport. The current VLD ALP (May 2008) includes the proposed general aviation area improvements as part of their long-term design plans (**Appendix A**).

VLD conducted an Airport Traffic Control Tower Siting Study (September 2020) which analyzed the current inadequacies of the existing ATCT. The study provided an analysis of six potential sites for the proposed new ATCT and selected a preferred site (**Appendix B**). The analysis determined that "the existing tower cab is located approximately 30 feet above ground level and fails to maintain adequate line of sight to all airfield movement areas, as required per FAA Order 6480.4B, *Airport Traffic Control Tower Siting Process*. Additionally, the existing air terminal building, upon which the ATCT cab resides, is located too close to the airfield, is within the identified BRL, and is reaching the end of its useful life" (McFarland Johnson, 2020). This study validates the need to remove the existing air terminal building

[1] A Level 1 ATCT is a tower without a radar; typically provide service using direct observation primarily to aircraft operating under Visual Flight Rules (VFR)

[2] The air terminal is a structure that combines the airport terminal and an air traffic control tower

not only because it is within the BRL, but because the existing ATCT no longer meets current FAA standards.

VLD is a commercial service airport owned and operated by the Authority. This airport was initially developed in 1930 by the Valdosta City Council as an aircraft landing site on Madison Highway but was later expanded in 1940 and utilized as an auxiliary airfield for Moody Air Force Base during World War II (LCHS, 2022). VLD was converted to a public airfield in 1946 with commercial services (CHG, Inc., 2022). The existing air terminal building was constructed in 1948 and requires continual improvements and repairs to maintain acceptable functionality for safe airport operations.

1.2 PROJECT LOCATION

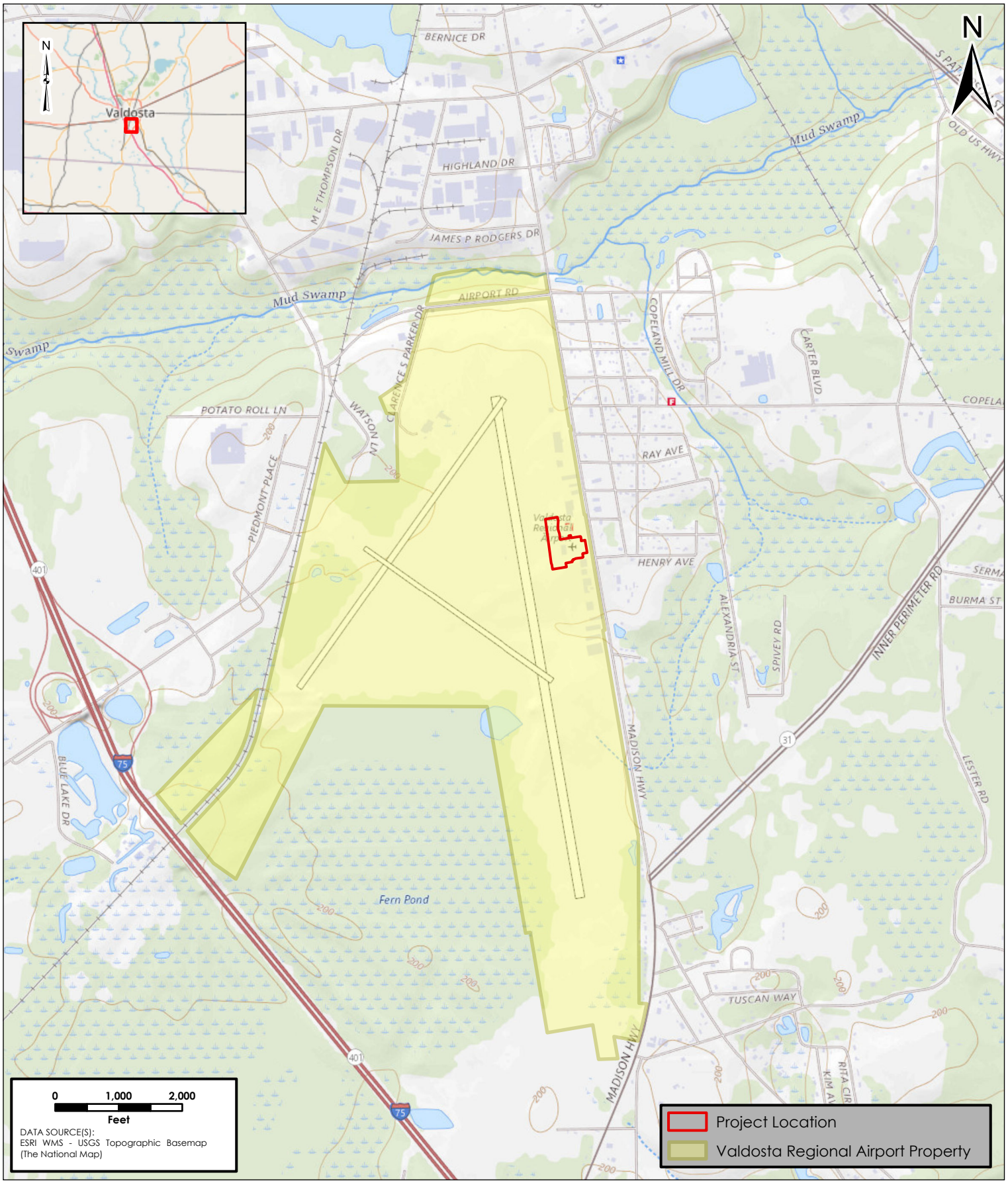
VLD consists of approximately 760 acres in Lowndes County in southern Georgia (**Figure 1**). VLD is classified as a Level III[3] Airport by the Georgia Statewide Aviation System Plan (GSASP) and accommodates a variety of aviation-related activities that include commercial service, corporate/business jets, and recreational flying (GDOT, 2017). VLD averages approximately 22,000 aircraft operations a year and services mostly transient and local general aviation (AirNav, 2022). Airport infrastructure includes two active runways (Runway 18/36 and 4/22), airfield, hangars, parking, Aircraft Rescue and Firefighting Facility (ARFF), administration buildings, a commercial airline terminal along Runway 4/22, and a general aviation air terminal along Runway 18/36 (**Appendix C**). The general aviation improvements are proposed entirely within the airport property boundary (**Figure 2**). VLD is predominantly surrounded by agricultural/forested land, with industrial uses occurring to the north and a mix of commercial and residential uses to the east and south of the property.

1.3 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

Purpose. The purpose of this project is to remove the existing air terminal building, including the ATCT tower, found in the BRL of Runway 18/36 and modernize associated infrastructure.

Need. This project is needed due to a variety of maintenance issues and the position of the existing air terminal building within the BRL. Redevelopment of the existing ATCT is also needed to resolve line-of-site issues for air traffic controllers to ensure safe airport operations in accordance with FAA standards.

[3] A Level III Airport is defined as a business airport of regional impact (GDOT, 2017).



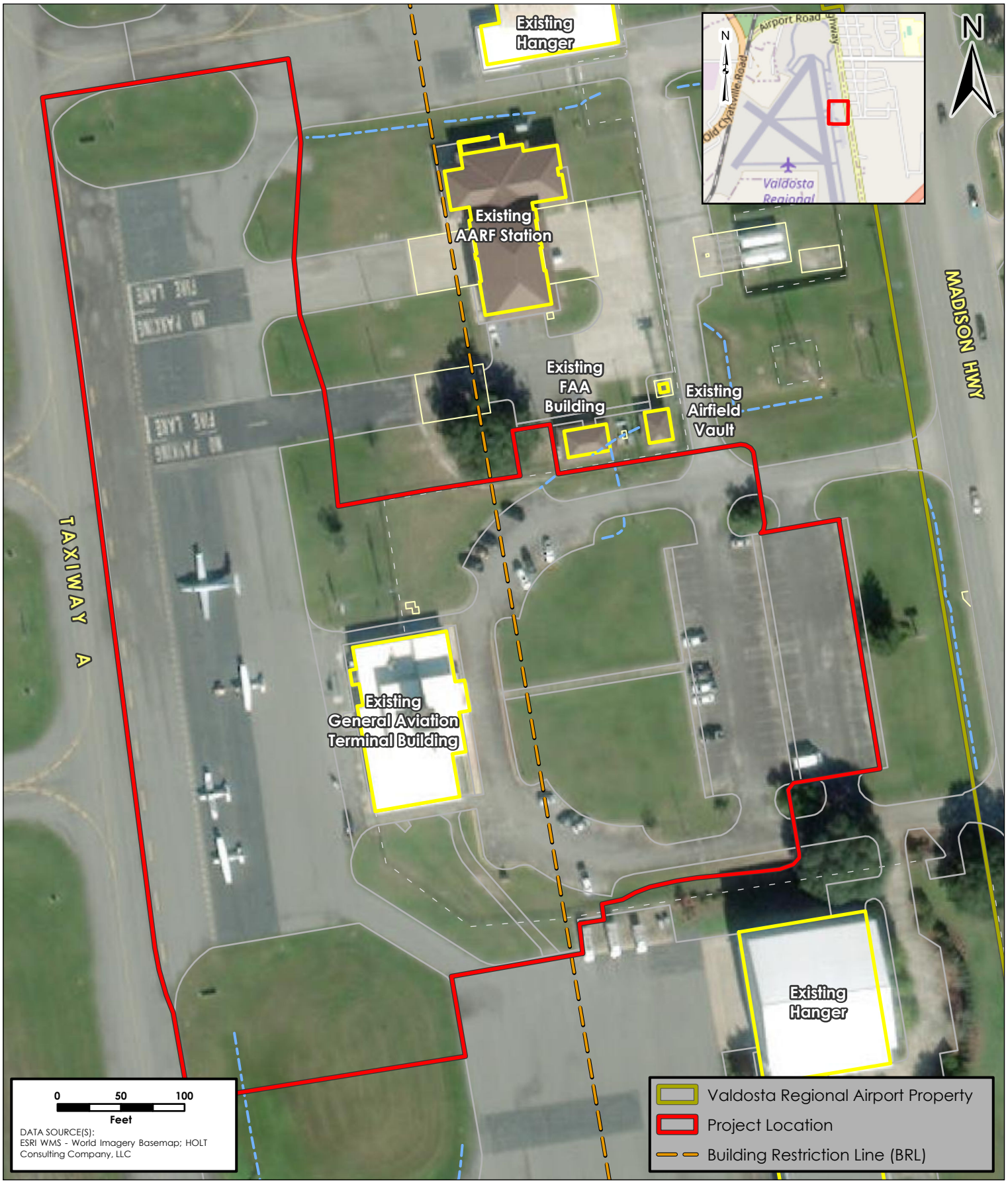
Valdosta Regional Airport

Project Location

VLD Terminal and Apron Improvements
1750 Airport Road
Valdosta, Lowndes County, Georgia

Project No.:	22154
Drawn By:	JRN
Reviewed By:	GA
Approved By:	JT
Date:	Sep 2022
FIGURE NUMBER	1

J:\ERS - Company\Projects\2022\22154-VLD EA\Graphics\Valdosta Regional Airport - EA\Valdosta Regional Airport - EA.aprx



Valdosta Regional Airport

Current Conditions

VLD Terminal and Apron Improvements
1750 Airport Road
Valdosta, Lowndes County, Georgia

Project No.:	22154
Drawn By:	JRN
Reviewed By:	GA
Approved By:	JT
Date:	Sep 2022
FIGURE NUMBER	2

J:\ERS - Company\Projects\2022\22154-VLD EA\Graphics\Valdosta Regional Airport - EA\Valdosta Regional Airport - EA.aprx

1.4 INTERGOVERNMENTAL AND STAKEHOLDER COORDINATION

The Intergovernmental Coordination Act and Executive Order (EO) 12372, as amended to EO 12416, *Intergovernmental Review of Federal Programs*, requires federal agencies to provide opportunities for consultation by elected officials of state and local governments that would be directly affected by a federal proposal.

Prior to formal public engagement, the FAA, on behalf of VLD, provided preliminary project information via a letter dated 14 March 2022 to the Georgia State Historic Preservation Office (SHPO) to begin early Section 106 Consultation. Georgia SHPO, in a letter dated 11 April 2022 (Georgia SHPO File No. HP-220315-001), stated that this general aviation improvement project (as described) would constitute an adverse effect on a historic property (i.e., the existing air terminal building). Early coordination documents with Georgia SHPO are included in **Appendix D**. SHPO requested a Memorandum of Agreement (MOA) between FAA, VLD, and SHPO be developed to mitigate the adverse effects to the existing air terminal building. The MOA was finalized and approved in February 2023 (**Appendix G**).

In addition, VLD conducted early stakeholder engagement with relevant agencies, and other stakeholders about the Proposed Action and alternatives (see **Appendix D** for stakeholder coordination). In October of 2022, VLD, through early scoping, contacted federally recognized tribes with potential interest in the area for the Proposed Action. These letters were followed up with formal scoping from the FAA in December of 2022.

The scoping process allowed these stakeholders to comment on the Proposed Action and its impacts and submit any responses or comments. Stakeholder comments regarding the Proposed Action are summarized below.

- The Georgia Department of Natural Resources (DNR), Environmental Protection Division, responded in a letter dated 20 October 2022, that they have no comments associated with the project at this time.
    - Georgia DNR Air Protection Branch, responded in a letter dated 15 November 2022, that they have no comments on the Proposed Action as the county of the project area is not within a nonattainment area and/or maintenance area.
- The Valdosta Heritage Foundation responded in a letter dated 20 October 2022 that while the existing air terminal building is eligible for the NRHP list, they understand the need for the Proposed Action and are appreciative of the photo documentation submission to the Lowndes County Historical Society and Museum and transfer of the Heritage Exhibit to the new building.
- The Catawba Indian Nation Tribal Historic Preservation Office responded with a letter dated 26 October 2022 stating they had no immediate concerns; however, they request immediate notification if Native American artifacts and/or remains are located during ground disturbance.
- The Cherokee Nation responded in a letter dated 4 October 2022 that Lowndes County, and subsequent project area, is outside the Cherokee Nation's area of interest, thus they defer to federally recognized tribes that have an interest in the project area land base.
- The Eastern Shawnee Tribe responded in a letter dated 21 October 2022 that although their people occupied these areas historically and/or prehistorically, they see no adverse effects of the Proposed Action at this time but request immediate contact (within 24 hours) if archeological site or objects are found.

- The U.S. Army Corps of Engineers responded to a letter dated 26 August 2022 requesting a jurisdictional determination (JD) for the VLD project area. This JD was approved and confirmed with letter correspondence dated 26 September 2022. The JD determined the VLD terminal improvement and apron project area is composed completely of dry land, and there are no water features of any kind.
- U.S. Fish and Wildlife Service (USFWS) was contacted about listed species in the project area, and an IPaC Report was submitted to make an effects determination on listed species. USFWS confirmed no significant impacts of the Proposed Action, approved on 24 October 2022.
- The City of Valdosta Mayor Scott James Matheson responded in approval of the Proposed Action via letter dated 28 October 2022.
- The Advisory Council on Historic Preservation (ACHP) responded 7 November 2022, stating that Section 106 and its implementing regulations do not apply to this undertaking. Noting that the final Section 106 agreement developed in consultation with SHPO is necessary.

1.5 NEPA AND OTHER COMPLIANCE REQUIREMENTS

NEPA is a federal statute requiring the identification and analysis of potential environmental impacts associated with proposed federal actions before those actions are taken. NEPA helps decision makers make well-informed choices based on an understanding of the potential environmental consequences. NEPA established the CEQ, which is charged with developing and implementing regulations and ensuring federal agency compliance with NEPA. The process for implementing NEPA is outlined in 40 CFR §§ 1500–1508, *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*, as amended in May 2022.

CEQ regulations specify that an EA must be prepared to provide evidence and analysis to determine whether to prepare a FONSI or an Environmental Impact Statement (EIS). The EA aids in an agency's compliance with NEPA when an EIS is unnecessary and facilitates the preparation of an EIS when one is required.

DOT Order 5610.1C, *Procedures for Considering Environmental Impacts* (18 September 1979) establishes procedures for consideration of environmental impacts in decision-making on actions proposed by the DOT. This order is intended to supplement regulations promulgated by CEQ.

The FAA, as an agency within the DOT, has established additional NEPA requirements. FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* (16 July 2015), and its supplemental guidance document FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions* (28 April 2006), represent the FAA's policies and procedures for ensuring agency compliance with NEPA and provide procedures for personnel implementing FAA NEPA regulations.

In compliance with NEPA, VLD has determined that preparing an EA is the appropriate level of environmental analysis for the Proposed Action. FAA's early coordination with Georgia SHPO determined the Proposed Action will result in significant impacts to historic resources, and mitigation measures are warranted. If the environmental impacts of the Proposed Action and associated mitigation do not rise to the level of significance requiring an EIS, a mitigated FONSI will be prepared. If significant impacts cannot be mitigated, the FAA will decide whether to prepare an EIS or abandon the Proposed Action. This EA will also be used to guide the FAA in implementing the Proposed Action

consistent with DOT standards for environmental stewardship should the Proposed Action be approved for implementation.

In addition to NEPA, the FAA is required to manage impacts to other resources as outlined in FAA Order 1050.1F and its supplemental guidance documents. This EA incorporates other relevant compliance requirements including but not limited to the following.

- Clean Water Act (CWA) of 1972, as amended (33 CFR §1251 et seq.), which establishes regulations regarding the discharge of pollutants into waters of the United States.
- Clean Air Act (CAA) of 1970, as amended (42 USC 7401 et seq.), which established regulations regarding criteria air pollutants.
- The Endangered Species Act (ESA) of 1973 (16 USC 35 § 1531 et seq.) requires the protection of federally listed species and their habitats.
- Section 106 of the National Historic Preservation Act (NHPA) of 1966 (54 USC § 300101 et seq.) requires federal agencies to consider the effects of their undertakings on historic properties per 36 CFR § 80.

2.0 PROPOSED ACTION AND ALTERNATIVES

This section describes the Proposed Action, alternatives considered, and the No Action Alternative. The NEPA process requires evaluation of potential environmental consequences associated with a Proposed Action and consideration of alternative courses of action. Only reasonable alternatives that satisfy the purpose and need of the Proposed Action, as defined in **Section 1.3,** were considered. The No Action Alternative was also considered as the baseline against which potential impacts were compared. While the No Action Alternative would not satisfy the purpose of and need for the Proposed Action, it was analyzed per CEQ and FAA NEPA guidance.

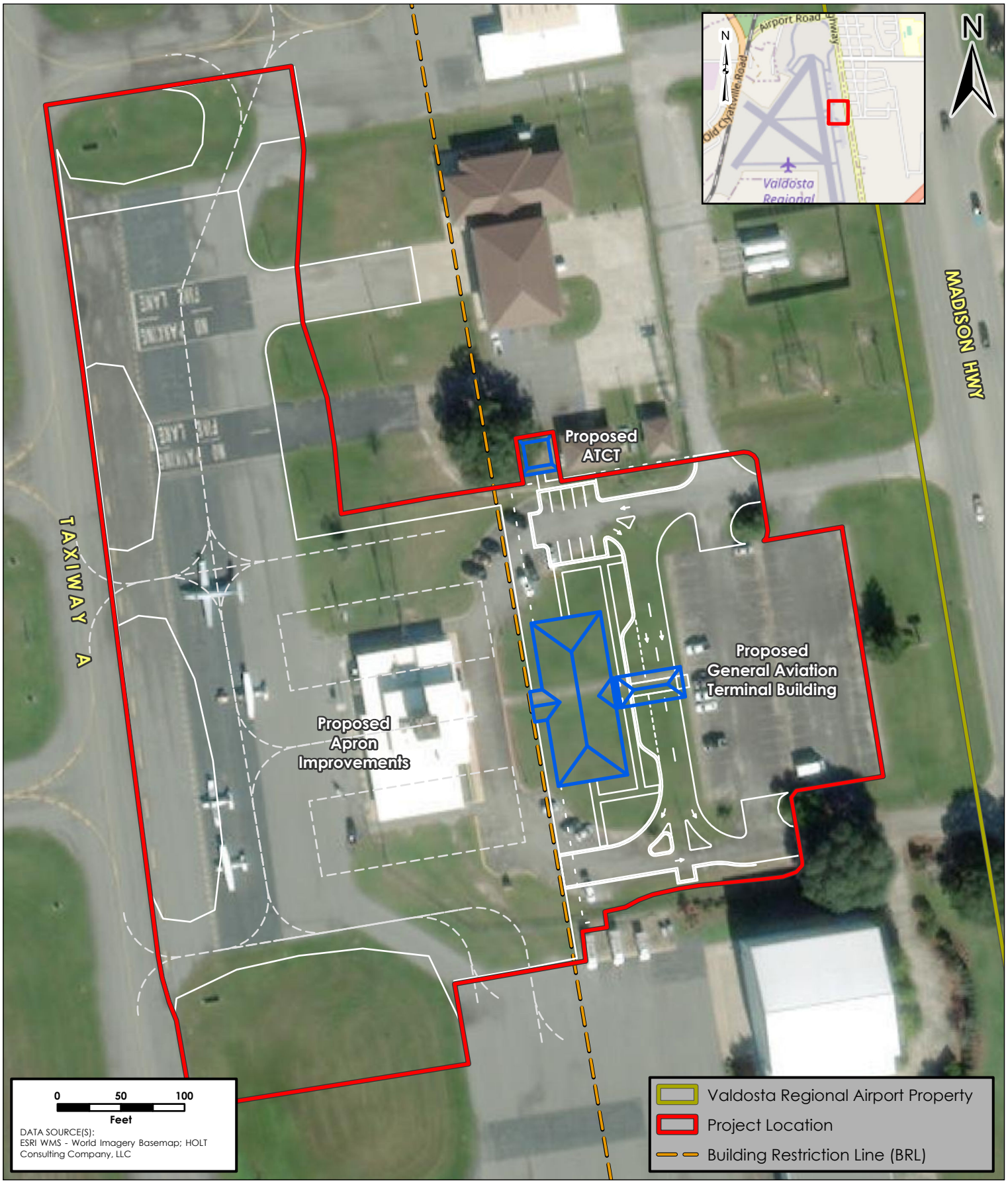
2.1 PROPOSED ACTION

The Proposed Action includes the following proposed general aviation area improvements as depicted in **Figure 3**:

- Demolition of the existing air terminal building;
- Construction of the proposed terminal building immediately east of the existing air terminal building, on existing airport turf;
- Construction associated with improvements to the proposed terminal building, including the relocation of Loop Road, the development of a new airfield access road, and an additional parking lot immediately north of the existing air terminal building;
- Construction of a new stand-alone Level 1 ATCT within existing airport property on previously disturbed land;
- Construction of taxilane geometry improvements along Taxiway A;
- Construction of improvements and expansion of existing aprons; and
- Construction of general site improvements including, but not limited to, grading and drainage, pavement improvements, marking and lighting, utility relocation, fencing, and erosion control.

The final design will meet requirements for airfield design as outlined in 14 CFR Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace* (12 August 2022), FAA AC 150/5300-13A, *Airport Design* (31 March 2022), and FAA Order 6480.4B, *Air Traffic Control Tower Siting Process* (13 August 2018). The final design will also be consistent with the FAA-approved VLD ALP and in accordance with AC 150/5070-6B, *Airport Master Plans* (27 January 2015).

It is proposed that all structures within the VLD BRL be permanently removed. While various design options could be viable alternatives, the environmental consequences (permanently impacting a historically significant structure) would be identical. Demolition of existing facilities will require coordination with Georgia SHPO prior to the start of construction. The FAA will notify the Advisory Council on Historic Preservation (ACHP) of the Proposed Action and draft a MOA, including all avoidance, minimization, and mitigation measures proposed to resolve adverse effects resulting from the Proposed Action. Further, the Proposed Action will ensure that the final engineered design does not negatively impact any additional environmental resources (i.e., water resources, biological resources, noise, etc.).



Valdosta Regional Airport

Proposed Action

VLD Terminal and Apron Improvements
1750 Airport Road
Valdosta, Lowndes County, Georgia

Project No.:	22154
Drawn By:	JRN
Reviewed By:	GA
Approved By:	JT
Date:	Sep 2022
FIGURE NUMBER	3

J:\ERS - Company\Projects\2022\22154-VLD EA\Graphics\Valdosta Regional Airport - EA\Valdosta Regional Airport - EA.aprx

2.2 ALTERNATIVES

Considering alternatives helps avoid unnecessary impacts and allows for an analysis of reasonable options to achieve the stated goal. To be analyzed, an alternative must be considered reasonable, capable of implementation, and must satisfy the purpose and need of the Proposed Action. CEQ NEPA regulations define reasonable alternatives as economically and technically feasible options that meet the purpose and need for the Proposed Action. Specific requirements must be present or reasonably attainable to meet the Proposed Action's purpose and need.

Selection standards are used to establish the parameters that must be met for alternatives to be considered reasonable and in support of the Proposed Action. For this EA, all alternatives considered must ensure VLD continues to conduct safe airport operations by complying with current airport design standards. Each proposed alternative was evaluated against the following selection standards:

- Must comply with 14 CFR Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace* (12 August 2022).
- Must comply with FAA AC 150/5300-13A, *Airport Design* (31 March 2022).
- Must limit impacts to environmental resource categories.

The determination of airfield design restrictions is outlined in 14 CFR Part 77 and FAA AC 150/5300-13A. The designation of an airport's BRL, in accordance with FAA AC 150/5300-13A, is established by the obstruction standards as outlined in 14 CFR Part 77. The existing air terminal building is documented as an obstruction because it penetrates VLD's transition surface. Any new construction to be undertaken as a part of the Proposed Action must also consider any disproportionately high impacts to other environmental resource categories (i.e., water resources, biological resources, noise, etc.) and opt for the alternative with the most minimal impact.

The development of a new ATCT was previously analyzed by VLD as part of a separate Tower Sitting Study conducted in September 2020 (McFarland Johnson, 2020) (**Appendix B**). This study determined the existing ATCT fails to maintain adequate line of sight and proceeded to analyze six (6) potential new ATCT sites. The current proposed ATCT site, as outlined in the Proposed Action, represents the preferred tower location as concluded in the Tower Sitting Study**.** Therefore, evaluating alternative locations for the new ATCT is not part of this alternatives analysis.

The following alternatives to the Proposed Action were considered by VLD:

- Alternative 1 – Remove the ATCT from the existing air terminal building and continue to utilize the existing terminal building.
- Alternative 2 – Decommission the existing air terminal building without removal of the existing structure and develop a new terminal building in a different location within VLD property.

To be carried forward for analysis, the alternatives must meet all four selection standards listed in **Table 2-1.** The table also provides a screening of project alternatives based on selection standards, with green indicating that the selection standard is met, yellow indicating that the selection standard is partially met, and red indicating that the selection standard is not met.

Table 2-1 Alternatives Considered and Selection Standards

Alternatives Considered	Selection Standards		
	Comply with 14 CFR Part 77	Comply with FAA AC 150/5300-13A	Limit impacts to environmental resource categories
Preferred Alternative (Proposed Action)	Removes obstructions within the Transition Surface	Removes obstructions within the BRL	Proposed terminal building, ATCT, and general site improvements will be constructed on previously disturbed land
Alternative 1	Existing air terminal will continue to penetrate the Transition Surface	Existing air terminal will remain within the BRL	New ATCT and general site improvements will be constructed on previously disturbed land
Alternative 2	Existing air terminal will continue to penetrate the Transition Surface	Existing air terminal will remain within the BRL	New ATCT and general site improvements will be constructed on previously disturbed land; Proposed terminal will be constructed on airport-maintained turf
No Action	Existing air terminal will continue to penetrate the Transition Surface	Existing air terminal will remain within the BRL	Only new ATCT would be constructed

Legend: CFR – Code of Federal Regulations; FAA – Federal Aviation Administration; AC – Advisory Curricular; BRL – building restriction line; ATCT – air traffic control tower

Alternative 1 would remove the ATCT portion of the existing air terminal building and allow VLD to continue to use the existing terminal building. This would minimize impacts to environmental resources by only constructing a new ATCT and making additional general improvements such as grading, fencing, and apron improvements on previously disturbed land and some existing pavement. However, Alternative 1 would continue to use the existing air terminal building in its current location, which does not align with regulations outlined in FAA part 77 and/or FAA AC 150/5300-13A.

Alternative 2 would decommission the existing air terminal building without removing the existing structure and develop the proposed terminal building in a different location within VLD property. This would limit impacts to environmental resources but would require construction to occur entirely on maintained turf rather than occurring on portions of existing impervious surface and maintained turf. Additionally, this alternative would require taxilane construction to connect the proposed terminal building to Taxiway A, further increasing ground-disturbing activities. Alternative 2 would not remove the existing air terminal building from its current location, which does not align with regulations outlined in FAA part 77 and/or FAA AC 150/5300-13A.

Based on the above matrix, no alternatives to the Proposed Action adequately address the selection criteria. Therefore, only the Proposed Action and No Action Alternative were carried forward for analysis under NEPA.

2.3 No Action Alternative

The No Action Alternative is included as a baseline against which the Proposed Action's impacts and other potential action alternatives can be evaluated. Under the No Action Alternative, the existing facilities would remain as they are and VLD would continue using and maintaining the existing structures as needed. As previously described, this action does not meet the regulations outlined in FAA part 77 and FAA AC 150/5300-13A

2.4 Identification of the Preferred Alternative

The FAA has identified the Proposed Action as the preferred alternative.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter determines whether each resource area will be affected by the Proposed Action. If an effect is possible, the resource will be assessed based on current/baseline conditions, with an outline of the potential consequences of implementing the Proposed Action and the No Action Alternative.

3.1 RESOURCES NOT CARRIED FORWARD FOR ANALYSIS

NEPA requires the analysis to address environmental resources that could be affected by the Proposed Action. Environmental resources that do not have the potential to be affected need not be analyzed. As a result, 12 resource areas (described below) were eliminated from further consideration.

3.1.1 Air Quality

Air quality is the measurement of how clean or polluted the air is and is regulated in accordance with the CAA, as amended (42 USC §§ 7401 et seq.), which establishes a national policy regarding air pollutants. The CAA required the Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) for six criteria pollutants: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO2), ozone (O3), particulate matter (PM), and sulfur dioxide (SO2) (FAA, 2015). The NAAQS established outdoor exposure limits based on concentration over a certain time, and areas where the air quality is within or better than the NAAQS are considered "in attainment." The EPA produces a Pollutant Summary Report by county, and Lowndes County is reported as being "in attainment."

Air quality in Georgia for EPA-defined criteria pollutants is measured and tracked by the Ambient Monitoring Program of the Air Protection Branch of the Georgia Environmental Protection Division (EPD). Air quality reports indicate that Valdosta has exceeded EPA's acceptable levels of measured criteria pollutants a total of two days over a five-year period (2016–2020).

The proposed terminal building, ATCT, and associated improvements are designed to maintain current capacity and meet aviation safety standards as outlined in **Section 1.0**. The Proposed Action is not designed to meet future growth and would not increase airspace utilization, flight duration, aircraft types, or ground transportation within VLD. The Proposed Action would include temporary construction and demolition activities that would utilize best management practices (BMP) to ensure activities are within NAAQS for relevant criteria pollutants. BMPs may include, but are not limited to, using fuel-efficient equipment, powering down fuel-consuming equipment when not in use, or watering any exposed dirt to control dust. All appropriate county, state, and federal permits and any additional work plans (e.g., dust control) for construction would be obtained prior to the start of any ground-disturbing activities.

Based on this analysis, air quality has been eliminated from further consideration.

3.1.2 Biological Resources

Biological resources are the native or established biotic environment within the project area, including flora, fauna, threatened and endangered species, and protected habitat. The Proposed Action takes place within existing airport property, on previously disturbed land, mowed and maintained lawn, current buildings and pavement, and would not involve the removal or disturbance of any sensitive habitat that may provide suitable habitat for listed species. In compliance with the ESA, 50 CFR § 17, pedestrian surveys for listed species were conducted within the project area by qualified biologists by Environmental Resource Solutions in February and September of 2022. There were no direct

observations or signs of listed species within the proposed action area, and no potential habitat was observed. State and federally listed species with potential for occurrence in the Proposed Action area can be found in **Appendix E** and **Appendix F**.

United States Fish and Wildlife Service (USFWS) was consulted on the project during early scoping and has concurred with the finding of "No Effect" for listed species in a letter dated 24 October 2022 (**Appendix D**). Therefore, biological resources were eliminated from further consideration analysis.

3.1.3 Climate

Climate change is defined as long-term shifts in average global weather and temperature patterns, more recently related to human-driven burning of fossil fuels and subsequent release of greenhouse gasses (GHG) (United Nations, 2022). The Proposed Action would not result in long-term, permanent emissions of GHGs. Air emissions are expected to be short-term and generated only from temporary construction-related activities. The proposed action is expected to remain below the de minimis[4] threshold under the general conformity rule and to result in only the temporary increases of GHGs. The construction of a new terminal, ATCT, and associated infrastructure improvements will not increase the airspace utilization, flight duration, aircraft types, or ground transportation within VLD. The proposed action is not designed to meet future capacity but maintain current capacity and meet aviation safety standards as outlined in **Section 1.0**. Any impact through point source or fugitive emission as part of the Proposed Action would be permitted in compliance with local regulations prior to the start of ground-disturbing activities. Therefore, climate was not caried forward for analysis.

3.1.4 Coastal Resources

Coastal resources include all natural resources occurring within coastal waters. The Proposed Action would occur entirely within Valdosta, Georgia, in Lowndes County. This county does not contain any coastal resources and is not part of Georgia's Coastal Zone Management Program (CZMP). Therefore, coastal resources were not carried forward for analysis.

3.1.5 Farmlands

This resource is defined as land devoted to agricultural purposes. Generally, farmland can have several designations afforded protection by the Farmland Protection Policy Act (FPPA) of 1981: prime farmland, unique farmland, and farmland of state importance. The FPPA ensures that federal actions do not cause unnecessary conversion of farmland for non-agricultural purposes and is meant to provide long-term national food security through the preservation of suitable agricultural areas.

The Proposed Action will involve construction and infrastructure improvements to VLD general aviation area. Based on the United States Department of Agriculture Natural Resource Conservation (USDA-NRCS) soil survey, the project area is mapped as AdA (Albany sand, 0 to 2 percent slopes). This soil type is not designated as prime farmland, and the project area is not slated for future agricultural use. Therefore, farmland is not carried forward for analysis.

3.1.6 Hazardous Material, Solid Waste, and Pollution Prevention

The Proposed Action would not result in the production or release of hazardous material. During past renovations of the existing air terminal building, no hazardous material (e.g., asbestos) was found and none is expected to occur during the Proposed Action. Should hazardous material be discovered during

[4] De minimis levels are minimum thresholds for which a conformity determination must be performed

demolition activities, it would be removed in accordance with current regulations and industry standards.

The Proposed Action would result in the production of solid waste from the removal of the existing air terminal building and general site improvements (i.e., taxiway improvements, parking, taxiway improvements, etc.). Solid waste would be managed according to regulations set forth in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, Resource Conservations and Recovery Act (RCRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986. Prior to any construction activities, VLD will obtain a demolition permit from the City of Valdosta, and the appropriate waste management will be contacted. Currently, industrial waste management facilities located closest to VLD are Deep South Sanitation and Waste Management-Valdosta Hauling. Solid waste produced from this project is expected to be within the acceptable capacity of these facilities and would follow all local regulations.

A Pollution Prevention Plan will be developed prior to the start of construction/demolition activities. BMPs in this plan may include, but are not limited to, using fuel-efficient equipment, powering down fuel-consuming equipment when not in use, and watering any exposed dirt to control dust. Any debris resulting from the Proposed Action would be taken to an appropriate disposal facility. All applicable county, state, and federal permits and any additional work plans (e.g., dust control) for construction would be obtained prior to the start of any ground-disturbing activities.

The Proposed Action would follow all BMPs and applicable local, state, and federal regulation during demolition and construction activities. Therefore, hazardous material, solid waste, and pollution prevention were not carried forward for analysis.

3.1.7 Land Use

The Proposed Action would not alter current land use designations or affect the land use compatibility of VLD and the surrounding community. The Proposed Action would take place entirely within VLD property. Therefore, land use was not carried forward for analysis.

3.1.8 Natural Resources and Energy Supply

The Proposed Action would have minor long-term benefits to energy use through the construction of the proposed terminal building and ATCT with modern energy-efficiency standards. The Proposed Action would not change aircraft or vehicle traffic patterns that could alter fuel usage, or have measurable effects on local supplies of fuel, energy, or natural resources. The Proposed Action would not result in additional structures that would increase air traffic or capacity. Therefore, natural resources and energy supply were not carried forward for analysis.

3.1.9 Noise and Noise-Compatible Land Use

The Proposed Action would increase short-term noise impacts associated with temporary construction activities. Such activities would be negligible compared to the current noise generated by VLD activities such as mowing and takeoff/landing of aircraft. Also, the Proposed Action would not conflict with applicable federal, state, or noise control regulations and would not result in continuous and long-term elevated noise levels. Therefore, noise was not carried forward for analysis.

3.1.10 Socioeconomics, Environmental Justice, Children's Environmental Health and Safety Risks

The Proposed Action would provide long-term safety benefits to VLD by removing the existing air terminal building from the BRL and improving the transition surfaces from the terminal to the active airfield. Construction activities would include temporary safety and occupational health risks typical to a civil construction project. Contractors must comply with Occupational Safety and Health Administration (OSHA) safety standards and project-specific work safety plans.

There is no potential for adverse environmental justice impacts to occur as described in EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low Income* and EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. The Proposed Action takes place entirely within VLD property and would not impact the surrounding communities.

The Proposed Action would provide short term-benefits to socioeconomics with increases in temporary employment and local-goods consumption through construction activities. All construction activities would be temporary, take place on VLD property, and would not increase vehicular or air traffic utilizing VLD.

The Proposed Action would not conflict with applicable safety regulations or result in continuous and long-term adverse safety and occupational health risks. Therefore, socioeconomics, environmental justice, and children's health and safety risks was not carried forward for analysis.

3.1.11 Visual Resources

The Proposed Action would redesign existing infrastructure to improve airport safety by removing structures from the BRL. The Proposed Action may also add or modify stormwater structures within the project area. The proposed terminal building will be immediately east of the existing air terminal building, and the new ATCT will be adjacent to existing VLD buildings. The Proposed Action would provide minimal impacts to the existing viewshed and would not add structures or fixtures that would increase light emissions past the current usage. The overall viewshed and purpose of the terminal and airfield area would not be altered. Therefore, visual resources were not carried forward for analysis.

3.1.12 Water Resources

The Proposed Action would take place entirely within VLD property on existing airport infrastructure. Site visits and environmental surveys were conducted on February 3 and September 8, 2022, within the project area by qualified biologists with Environmental Resource Solutions. These surveys concluded that the project area does not contain wetlands or floodplains, and the Proposed Action would not inhibit groundwater recharge or draw additional water from the regional aquifer. The Proposed Action will not affect the Chattooga Wild and Scenic River, or its tributaries, in northeastern Georgia (the only designated Wild and Scenic River in Georgia). A Drylands Permit for the Proposed Action from the United States Army Corps of Engineers (USACE) was obtained on 26 September 2022. Therefore, water resources were not carried forward for analysis.

3.2 RESOURCES AFFECTED AND ENVIRONMENTAL CONSEQUENCES

The following resources have the potential to be impacted by the Proposed Action and were carried forward for detailed analysis:

- Historical, Architectural, Archeological, and Cultural Resources
- Section 4(f) Resources

3.2.1 Historical, Architectural, Archeological, and Cultural Resources

Historical, architectural, archaeological, and cultural resources encompass a variety of sites, properties, and physical resources connected to human activities and cultural references. The NHPA requires federal agencies to consider the effects of their undertakings (i.e., a project, activity, or federally funded program) on cultural resources, especially historic properties that are or may be eligible for listing on the National Register of Historic Places (NRHP).

The Regulatory Setting includes but is not limited to the following.

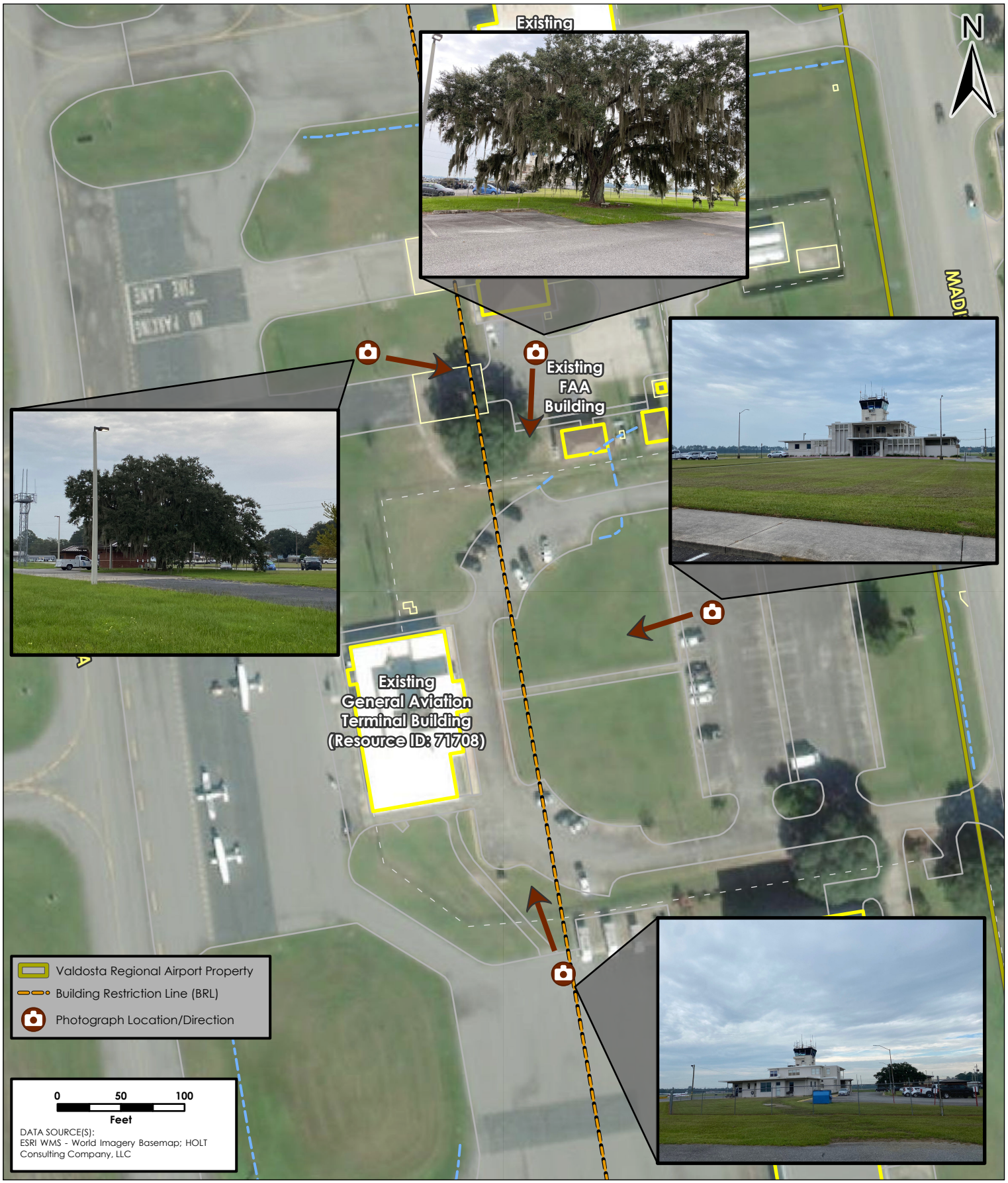
- Section 106 of the National Historic Preservation Act of 1966 (NHPA);
- DOT Order 5650.1, Protection and Enhancement of the Cultural Environment;
- Executive Order 11593, Protection and Enhancement of the Cultural Environment; and
- Department of Transportation Act, Section 4(f)

The Affected Environment, through the lens of historical resources, involves the existing air terminal building. In 2012 Georgia Historic Preservation District was contacted about the existing air terminal building for an architectural resources survey. This correspondence revealed that under provisions of Section 106 of the NHPA (16 U.S.C § 470 et seq.), the Valdosta General Aviation Air Terminal Building should be considered eligible for listing in the NRHP. In 2022, SHPO was consulted in connection to the Proposed Action. SHPO determined the existing air terminal building is still eligible for listing on the NRHP and indicated the Proposed Action would cause adverse effects to the historic property, as defined in 36 CRF Part 800.5(a)(2), and mitigation efforts would be necessary if the Proposed Action were to proceed (**Appendix D**). Existing cultural resources are displayed on **Figure 4**.

Environmental Consequences of the proposed action would be the loss of a historic property eligible for listing on the NRHP, based on determinations of SHPO.

The proposed action is not anticipated to have any adverse effects on archeological, architectural, or cultural resources within the project area. In the unlikely event that cultural or archeological resources and/or artifacts are found, all tribes with interest in the Proposed Action (including but not limited to the Eastern Shawnee Tribe and Catawba Tribe), as well as appropriate state and local agencies would be contacted within 24 hours.

Under the **No Action Alternative**, the existing air terminal building would remain as is, and there would be no adverse effects to the building.



Valdosta Regional Airport

Existing Cultural Resources

VLD Terminal and Apron Improvements
1750 Airport Road
Valdosta, Lowndes County, Georgia

Project No.:	22154
Drawn By:	JRN
Reviewed By:	GA
Approved By:	JT
Date:	Oct 2022
FIGURE NUMBER	4

J:\ERS - Company\Projects\2022\22154-VLD EA\Graphics\Valdosta Regional Airport - EA\Valdosta Regional Airport - EA.aprx

3.2.2 Department of Transportation Act, Section 4(f) Resources

Section 4(f) of the U.S. DOT Act of 1966 (now codified at 49 USC § 303) protects significant publicly owned parks, recreational areas, wildlife and waterfowl refuges, and public and private historic sites (1050.1F). The existing air terminal building is protected under Section 4(f) as it is eligible for listing on the NRHP.

The Regulatory Setting related to Section 4(f) includes but is not limited to the following:

- Land and Water Conservation Fund Act of 1965, 16 USC §§ 4601-4 et seq;
- U.S. Department of Transportation Act, Section 4(f), 49 USC § 303;
- Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) – Section 6009; and
- U.S. Department of Defense Reauthorization

The Affected Environment under Section 4(f) would be the existing air terminal building and its historic value to the local community. Many passengers use this terminal for their travel needs. While the Proposed Action would demolish the historic terminal, the proposed terminal building would be built just east of the old terminal's current location. The shift of terminal location would still be able to accommodate local travels and make sure the building is within the BRL and compliant with FAA standards and regulations.

Environmental Consequences of the Proposed Action would be the total removal of the historic existing air terminal building and loss of the landmark. However, proper mitigation of its historic memory would be approved and initiated under SHPO.

Under the **No Action Alternative**, the existing air terminal building would remain as is; this alternative would preserve its memory and protection under Section 4(f).

4.0 CUMULATIVE IMPACTS

4.1 INTRODUCTION

Cumulative impacts examine past, present, and reasonably foreseeable future actions as they relate to the Proposed Action. These impacts can include any action taken by any federal or state agency, recognized Native American tribes, private entities, or local governments. Cumulative impacts surrounding a project area need to be considered per CEQ NEPA regulations and 40 CFR § 1508.7.

Over the course of the airport's history there have been improvements to maintain taxiways, hangers, and runways. These activities have occurred within the Proposed Action project area but were all Categorical Exclusion (CATEX) actions under NEPA, having no significant impact to resources. These specific actions included taxiway expansions and maintenance-based runway repair.

This project only carried forward Historical, Architectural, Archaeological, and Cultural Resources and Section 4(f) for analysis; therefore, cumulative impacts to cultural resources were examined.

4.1.1 Past Actions

- Taxiway M Improvements, widening and strengthening, CATEX (2018).
- North T-Hanger Taxiline repaving and widening, CATEX (2018).
- Runway 17-35 Mill and Overlay, taxiway removal and correction, airfield sign replacement, CATEX (2020).
- Runway 4-22 crack seal and correction in payment surface, CATEX (2021).

4.1.2 Present Actions

- General Aviation Air Terminal Improvements and new ATCT, EA (**Section 1.3**).

4.1.3 Future Actions

- Modify approach visibility minimums of Runway 17/35 and Runway 4/22.
- Update navigation and visual aids for Runway 4/22.
- Increase approach slope for Runway 4/22.
- Remove FAR Part 77 obstructions to Runway 4/22.

4.2 ENVIRONMENTAL CONSEQUENCES

Historical, Architectural, Archeological, and Cultural Resources

All the past projects identified within or adjacent to the current Proposed Action project area were CATEX projects and did not have any significant impacts to resources. However, the Proposed Action would have adverse effects to the historic existing air terminal building. The Proposed Action includes total demolition of the existing air terminal building, and there are not expected to be future cumulative impacts on this cultural resource.

5.0 PERMITS

A limited number of permits are foreseen to be applicable to the Proposed Action. The following is a list of permits required, with corresponding obtainment date, as well as potential permits.

- Dry Land Jurisdictional Determination Permit from USACE. Obtained 26 September 2022. (**Appendix D**)
- Construction and demolition permits for the city of Valdosta, Georgia.
- Solid waste removal permits for Valdosta, Georgia.

6.0 MITIGATION

Correspondence with Georgia SHPO confirmed the Valdosta General Aviation Air Terminal Building still holds its status as an eligible addition to the NHPA list. As such, it was determined that the Proposed Action would cause adverse effects to the historic building. Therefore, mitigation efforts by the FAA under direction from SHPO would be necessary for the Proposed Action to move forward. SHPO requested the development of a MOA between FAA, VLD, and SHPO to mitigate the adverse effects to the existing air terminal building. SHPO recommended that a Permanent Photographic Archival Record (PAR) and a historic narrative about the building's significance be completed for the existing air terminal building as mitigation for the adverse effects. The MOA was finalized in February 2023 (**Appendix G**).

Additional mitigation measures requested include the request for the PAR be submitted to the Lowndes County Historical Society and Museum and transfer of the Heritage Exhibit to the new building (**Appendix G**).

In the event that any Tribal artifacts, remains, or sites are discovered before or during construction activities, all work would stop and the appropriate tribal entities and SHPO officer will be contacted. Work would not continue until approved by the relevant agencies and Tribal governments.

7.0 PUBLIC INVOLVEMENT

A draft of this EA was made available to the public for 30 days, 10 February to 10 March 2023, after approval from each of the partnering agencies (HOLT Construction, FAA, SHPO, etc.). During the 30-day public comment period, the public can submit comments and concerns regarding the progression of this EA and subsequent Proposed Action. No comments were received about this EA during the comment period. A public Notice of Availability (NOA) was posted twice in local newspaper, *Valdosta Daily Times*, on Friday 10 February and Sunday 12 February 2023. A hard copy of the Final EA is available at the Willis L. Miller Library and Valdosta General Aviation Terminal; and an electronic copy is available online at www.flyvaldosta.com.

8.0 REFERENCES

AirNav, 2022	AirNav. 11 August 2022. *Valdosta regional Airport: KVL*. Accessed at: https://www.airnav.com/airport/KVLD
CHG, Inc., 2022	Commonwealth Heritage Group, Inc. 14 February 2022. *Cultural Resource Evaluation-Valdosta Regional Airport Terminal and Control Tower, Lowndes County, Georgia*.
GDOT, 2017	Georgia Department of Transportation. 2017. *Georgia Statewide Aviation System Plan: Summary Report for Valdosta Regional Airport*. Accessed at: https://www.dot.ga.gov/InvestSmart/Aviation/GAAirportsDocuments/Valdosta-VLD.pdf
LCHS, 2022	Lowndes County Historical Society and Museum. August 2022. *Aviation*. Online Exhibits: Transportation. Accessed at: https://valdostamuseum.com/exhibitions/online-exhibits-2/transportation/aviation/
McFarland Johnson, 2020	McFarland Johnson, Inc. September 2022. *Valdosta Regional Airport: Air Traffic Control Tower Siting Study*. Valdosta-Lowndes County Airport Authority
Georgia EPD, 2022	Georgia DNR. 2016-2020. *Air Protection Branch: 2016-2020 Air Quality Report*. Air Protection Branch. Ambient Monitoring Program.
United Nations, 2022	United Nations. (n.d.) *What is Climate Change?* United Nations, Climate Action. https://www.un.org/en/climatechange/what-is-climate-change

9.0 LIST OF PREPARERS

Kim Allerton, SES Environmental Resource Solutions LLC
BS Biology, Roanoke College
Years of Experience: 32

Jennifer Tyson, PMP, AICP, SES Civil and Environmental LLC
MS Forest Ecology and Management, Michigan Technological University
BS Geography, Florida State University
Years of Experience: 17

Gabrielle Allerton, SES Civil and Environmental LLC
BS Sustainable Development, Appalachian State University
Years of Experience: 4

Olivia Roorbach, AEC Environmental and Construction LLC
MS Marine Biology and Ecology, James Cook University
BA Environmental Studies, Tulane University
Years of Experience: 4