



COLUMBUS
REGIONAL AIRPORT AUTHORITY

Environmental Assessment for Cargo Campus Development

Rickenbacker Global Logistics Park

FINAL – June 2021

Prepared for
Columbus Regional Airport Authority

Prepared by:
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and TranSystems Corporation of Ohio

This environmental assessment becomes a Federal document when evaluated, signed, and dated by the Responsible Federal Aviation Administration (FAA) Official.

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1 Proposed Action

1.1 Introduction

This Environmental Assessment (EA) analyzes the potential environmental effects of the proposed Cargo Campus development and enabling projects (the Proposed Action) at the Rickenbacker Global Logistics Park (RGLP). The RGLP is a public/private partnership comprised of the Columbus Regional Airport Authority (CRAA), Capitol Square, Ltd., and Duke Realty Corporation. The RGLP includes five campuses totaling approximately 1,700 acres of land available for commercial/industrial development surrounding Rickenbacker International Airport (LCK or Airport) and near the Norfolk Southern - Rickenbacker Intermodal Terminal (Intermodal Facility). As one of the world's few cargo-dedicated airports, LCK offers an uncongested option to move air cargo to, from, and within the United States.

This proposed project includes development of the Cargo Campus, including new commercial warehousing facilities and associated roadways and other infrastructure. The project sponsor is the Columbus Regional Airport Authority (CRAA). The CRAA owns LCK and the Cargo Campus.

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 for implementing the National Environmental Policy Act of 1969 (NEPA), as amended (40 Code of Federal Regulations (CFR) 1500-1508). The purpose of this EA is to investigate, analyze, and disclose the potential impacts of the 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 requirement for the preparation of an Environmental Impact Statement (EIS). This EA has been prepared in accordance with Federal Aviation Administration (FAA) Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*. This EA was also prepared pursuant to other Federal and state laws relating to the quality of the natural and human environments.

1.2 Description of the Proposed Action

The Proposed Action consists of the development of several commercial bulk cargo distribution warehouse facilities, as well as an extension of Rickenbacker Parkway¹ to provide access to the site. **Exhibit 1-1, Project Site**, shows the general project area along with the location of the project site at LCK. The Proposed Action would occur on an approximately 330-acre site located to the south of LCK. The Proposed Action, which is shown on **Exhibit 1-2, Proposed Action**, includes the following activities:

- Site preparation of the Cargo Campus site which measures approximately 330 acres in size and is located south of LCK;
- Extension of Rickenbacker Parkway Phases 3b, and 4;

¹ Rickenbacker Parkway was originally constructed in the mid 2000s to improve access to the area south of LCK. Rickenbacker Parkway currently extends from Alum Creek Drive north of LCK to approximately 3,100 feet east of Ashville Pike to the south of LCK. Phase 2 of the Rickenbacker Parkway project included realignment of Alum Creek Drive south of State Route 317 to improve traffic flow. Phase 1 and Phase 2 are complete. Phase 3a is a previously approved project to extend Rickenbacker Parkway as a two-lane road along the current alignment of Airbase Road/Wright Road (an interior perimeter road) to provide vehicle access to the Golf Course Development Area. Phase 3b would expand the two lane road (constructed under Phase 3a) to four lanes and construct a roundabout at the eastern end. Phase 4 would construct an access road north from the roundabout through the Cargo Campus. No federal or state funding has been identified for phases 3A, 3B & 4. Local funding will be used as needed to accommodate development.

- Construction and operation of five commercial bulk distribution warehouse buildings totaling approximately 4.2 million square feet in area on the Cargo Campus;
- Construction of paved parking and internal vehicle circulation roads;
- Extension of utilities to and within the site; and
- Development of stormwater mitigation areas.

The construction process would use cut and fill from within the site. Therefore, no off-site borrow or spoil areas would be affected.

The Project Site is located south of LCK and is surrounded by commercial and aviation land uses to the north and west and a former golf course to the south. Project Site features include undeveloped land that is leased for agriculture and a former U.S. Air Force firing range.

The Proposed Action, when fully operational, would include bulk distribution warehouse facilities that are not dependent upon air travel. As such, the facilities would have no access to the airfield. Therefore, the proposed facilities would not cause an increase or decrease in operations and would not result in changes to the aircraft fleet at LCK.

It is anticipated that operation of the Proposed Action would require upgrades to the existing Midway Substation to provide adequate electrical power to the proposed bulk distribution warehouses. The existing Midway Substation, as shown on Exhibit 1-1, would be upgraded within its existing footprint and electrical distribution lines would be extended along Rickenbacker Parkway.

1.3 Proposed Federal Action

The Proposed Federal Action includes the following project component:

FAA consent to converting airport-dedicated property to non-aeronautical, revenue-producing purposes.

According to FAA Order 5190.6B, FAA Airport Compliance Manual, section 22.33, an FAA action is necessary in connection with the release of land purchased with a Federal grant. An airport sponsor incurs specific obligations to use land for airport purposes when it accepts AIP financing to buy land for airport development or noise compatibility. If an airport sponsor no longer needs airport land for aeronautical purposes, the sponsor may request that the FAA release the sponsor from its Federal grant assurance obligations addressing the uses of the land. A land release may be required for any elements of the Proposed Action that are not considered an aeronautical use. Long term leases that are not related to aeronautical activities or airport support services have the effect of a release for all practical purposes and shall be treated the same as a release. The Cargo Campus property is subject to Federal grant assurance obligations; therefore, FAA approval of a land release would be required for non-aeronautical development of the site. The area of the proposed land release is shown on Exhibit 1-1.

1.3.1 FAA's Authority to Regulate Land Use & NEPA Applicability

The “FAA Reauthorization Act of 2018” (the Act) was signed into law on October 5, 2018 (P.L. 115-254). In general, Section 163(a) of the Act requires FAA to evaluate its authority to directly or indirectly regulate an airport operator’s transfer or disposal of certain types of airport land. However, Section 163(b) identifies exceptions to this general rule. The FAA retains authority:

- To ensure the safe and efficient operation of aircraft or safety of people and property on the ground related to aircraft operations;
- To regulate land or a facility acquired or modified using Federal funding;
- To ensure an airport owner or operator receives not less than fair market value (FMV) in the context of a commercial transaction for the use, lease, encumbrance, transfer, or disposal of land, any facilities on such land, or any portion of such land or facilities;
- To ensure that the airport owner or operator pays not more than fair market value in the context of a commercial transaction for the acquisition of land or facilities on such land;
- To enforce any terms contained in a Surplus Property Act instrument of transfer; and
- To exercise any authority contained in 49 U.S.C. § 40117, dealing with Passenger Facility Charges.

In addition, Section 163(c) preserves the statutory revenue use restrictions regarding the use of revenues generated by the use, lease, encumbrance, transfer, or disposal of the land, as set forth in 49 U.S.C. §§ 47107(b) and 47133.

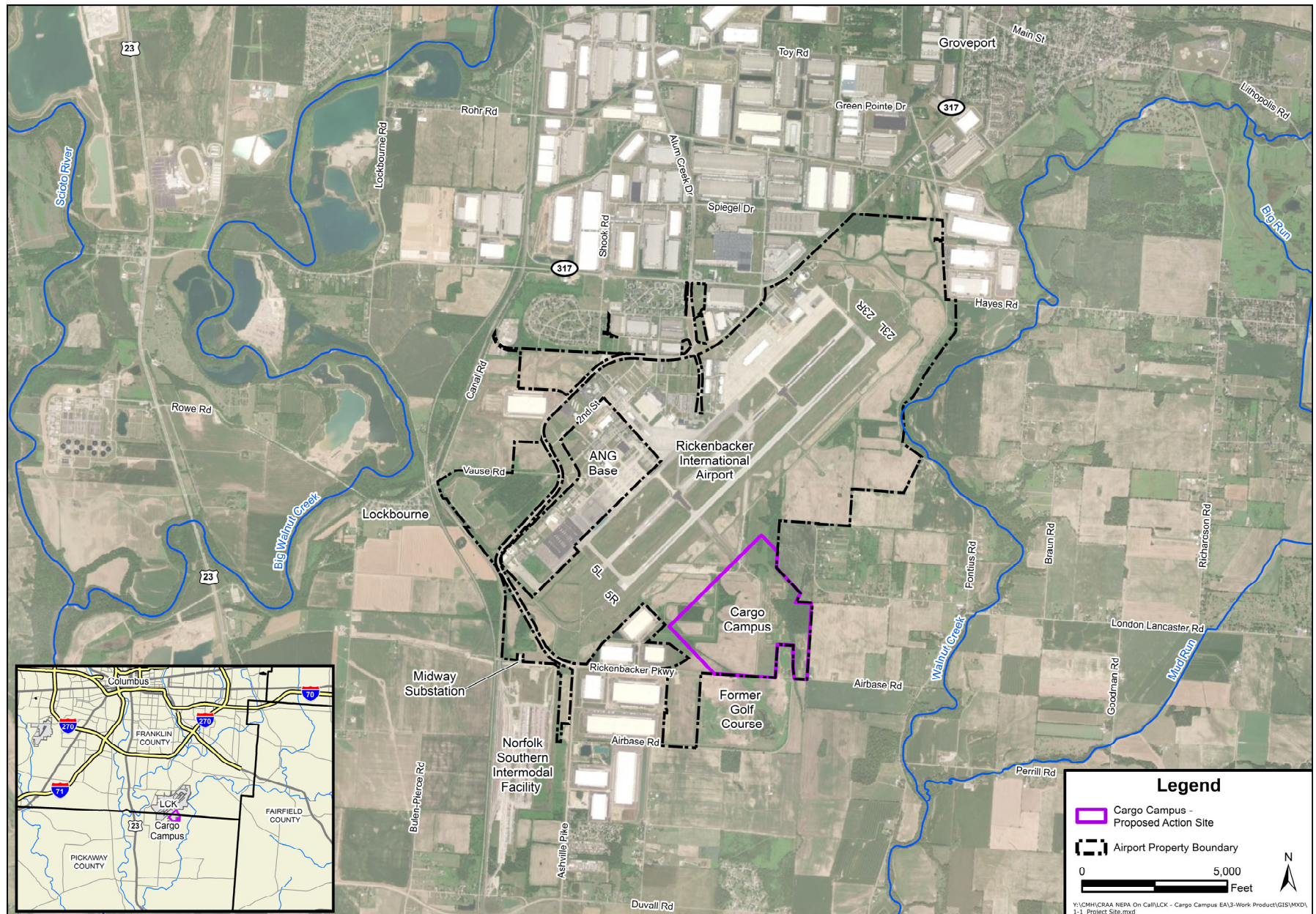
Section 163(d) of the Act limits the FAA’s review and approval authority for Airport Layout Plans (ALPs) to those portions of ALPs or ALP revisions that:

- Materially impact the safe and efficient operation of aircraft at, to, or from the airport;
- Adversely affect the safety of people or property on the ground adjacent to the airport as a result of aircraft operations; or
- Adversely affect the value of prior Federal investments to a significant extent.

The property subject of this EA was acquired from the Federal government as surplus property in 1984 and 1999. CRAA is requesting release from Federal obligations described in the quitclaim deed that requires continued use of the property for public purposes and to request permission to lease and/or sell the property for non-aeronautical use. Land acquired from the Federal government as surplus property requires FAA approval; therefore, the FAA requires a release of obligations for the land to be released for non-aeronautical development. The release of CRAA’s Federal obligations to the property is a Federal action subject to NEPA.

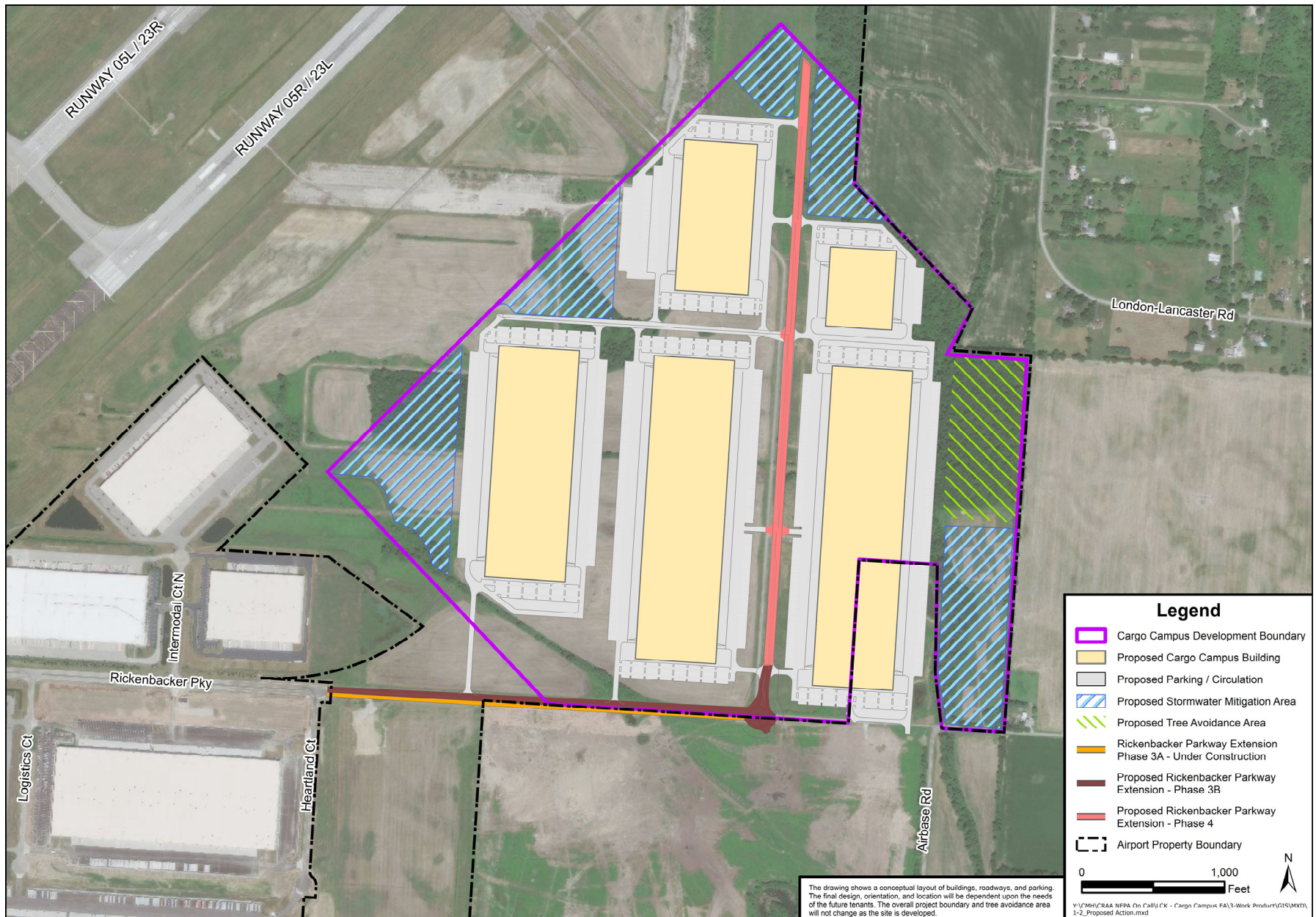
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Exhibit 1-1 – Project Site



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Exhibit 1-2 – Proposed Action



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2 Purpose and Need

This chapter of the Environmental Assessment (EA) describes the purpose and need for the Proposed Action at Rickenbacker International Airport (LCK or Airport). Federal Aviation Administration (FAA) Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions* requires that an EA address and convey the purpose and need for a proposed project. According to the Council on Environmental Quality (CEQ) and their implementing regulations for NEPA, the purpose and need shall briefly specify the underlying purpose and need for the proposed action. The purpose and need for the proposed action serves as the foundation for the identification of reasonable alternatives to the proposed action and the comparative evaluation of impacts of the project. In order for an alternative to be considered viable and carried forward for detailed evaluation within the NEPA process and this EA, it must address the needs, as described more fully in the following sections.

2.1 Purpose and Need for the Proposed Action

The Columbus Regional Airport Authority (CRAA), which owns and operates LCK and the Cargo Campus site, has undertaken a program to develop underutilized Airport-owned land in a way that is compatible with Airport operations. The development of commercial bulk distribution warehouse structures on the RGLP Cargo Campus site (Proposed Action) is consistent with this goal.

The purpose for the RGLP Cargo Campus Development (the Proposed Action) is to provide additional revenue to the CRAA and to accommodate the demand for commercial/industrial facilities that includes bulk distribution warehouses with convenient access to an intermodal terminal within the Columbus Region.

There is a need for bulk distribution warehouse space in the Columbus area with convenient access to the Intermodal Terminal. The developer has identified the need for up to 4.2 million square feet of warehouse space comprised of large bulk distribution facilities to meet future demand and economic development requirements. As shown in Table 2-1, employment in the transportation and warehousing sector is projected to grow in Ohio at a rate of 7.7 percent, which is over three times the average projected rate of growth across all industries.²

Table 2-1 – Ohio Employment Projections, 2018-2028

Industry	2018 Annual Employment	2028 Projected Employment	Change in Employment 2018-2028	Percent Change 2018-2028
Transportation and Warehousing	206,656	222,484	15,828	7.7%
Total – All Industries	5,860,006	5,998,703	138,697	2.4%

Source: Ohio Department of Job and Family Services.

The site developer tracks market conditions and has indicated that in the Columbus area, there have been 23 consecutive quarters of positive absorption of warehouse/distribution space, with overall vacancy rates currently at 4.4%. Based on market factors and employment projections, the developer has identified the need for commercial bulk distribution warehouse space. To meet the sizing requirements and provide space for surface

² Ohio Department of Job and Family Services, Ohio Statewide Industry Projections, 2018-2028, Available online at: <https://ohiolmi.com/Home/LTprojOhio?page85715=1&size85715=100>, Accessed May 7, 2021

vehicle circulation, parking, utilities, and stormwater, the developer has identified a need for a site that provides at least 300 acres. The CRAA also has a need to generate additional revenue from unused or underutilized property. The Proposed Action would meet the need by developing CRAA-owned property that is currently underutilized to accommodate the construction of bulk distribution warehouse facilities that have convenient access to the Intermodal Facility and that are compatible with FAA airspace restrictions and design standards. Construction of the Proposed Action is consistent with other cargo/warehouse facilities currently under development on other properties surrounding LCK.

2.2 Time Frame

The Proposed Action is expected to occur in multiple phases to meet the need for new commercial warehouse facilities. Additional commercial warehouse development is ongoing on the adjacent Intermodal Campus. The timing of the Proposed Action would be planned based on the rate at which the Intermodal Campus buildout occurs. It is expected that the construction of the Proposed Action would occur from 2024 to 2030. To enable development of the proposed bulk distribution warehouses, site work is expected to begin at the Cargo Campus site in 2022.

2.3 Required Land Use/Environmental Approvals and Permits

In addition to NEPA clearance, other Federal, State, and local permitting and approvals may be necessary to enable development of the Cargo Campus. The following sections list the additional environmental processing requirements.

Federal

- Federal environmental approval pursuant to NEPA
- Permit for the discharge of dredged or fill material into waters of the United States per Section 404 of the Clean Water Act administered by the U.S. Army Corps of Engineers (USACE)
- Federal Aviation Administration determination of effects, in consultation with the Ohio State Historic Preservation office (SHPO), Ohio History Connection, in accordance with Section 106 of the National Historic Preservation Act (NHPA)

State

- Ohio Environmental Protection Agency (OEPA) approval of a Section 401 Water Quality Certification and Isolated Wetlands Permit
- National Pollution Discharge Elimination System (NPDES) Permit administered by OEPA

3 Alternatives

3.1 Background

The Council on Environmental Quality (CEQ) regulations for implementing the National Environmental Policy Act of 1969 (NEPA) requires that the Federal decision makers perform the following tasks:

- Evaluate all reasonable alternatives, including alternatives not within the jurisdiction of the Federal agency, and for alternatives that were eliminated from detailed study, briefly discuss the reasons for being eliminated.
- Devote substantial treatment to each alternative considered in detail, including a no action alternative and the proposed action, so that reviewers may evaluate their comparative merits.

This section describes alternatives to the Proposed Action and evaluates the ability of the alternatives to meet the purpose and need described in Chapter Two. Federal and state guidelines concerning the environmental review process require that all prudent, feasible, reasonable, and practicable alternatives that might accomplish the objectives of a project must be identified and evaluated. Federal agencies may consider the applicant's purposes and needs and common-sense realities of a given situation in the development of alternatives.³

3.2 Initial Alternatives Screening

The Columbus Regional Airport Authority (CRAA) owns other vacant or underutilized property in the vicinity of Rickenbacker International Airport (LCK). The CRAA has undertaken efforts to identify property that is not needed for aeronautical purposes and is suitable for non-aviation development. Sites that are currently vacant or underutilized and available for non-aviation development are shown on **Exhibit 3-1, Non-Aviation Development Sites Owned by CRAA** and listed in **Table 3-1, Non-Aviation Development Sites Owned by CRAA**.

Table 3-1 – Non-Aviation Development Sites Owned by CRAA

Campus	Total Acreage	Available Acreage*
Cargo Campus	330	330
Gateway Campus	157	52
Intermodal Campus (including former Golf Course)	550	210
Rail Campus	254	215

Source: Duke Realty, Corporation

*Note: Available acreage represents land that is undeveloped and not otherwise dedicated to other users through build-to-suit agreements.

³ *Guidance Regarding NEPA Regulations*, CEQ, 48 Federal Register 34263 (July 28, 1983).

As shown in Exhibit 3-1 and Table 3-1; other sites are owned by the CRAA that may be available for commercial development. However, the Cargo Campus is the only remaining site suitable for development of the proposed bulk distribution warehouses. The demand exists for large warehouses to meet the needs of users. The other campuses, as described in the following sections, do not have the available space to accommodate the size or number of bulk distribution warehouses that are proposed by the developer to meet future demand for such facilities.

Gateway Campus

This campus is partially built out and does not have the available land for the proposed new bulk distribution warehouses. The site also does not offer convenient access to the Intermodal Facility. Therefore, this site is not carried forward for detailed evaluation.

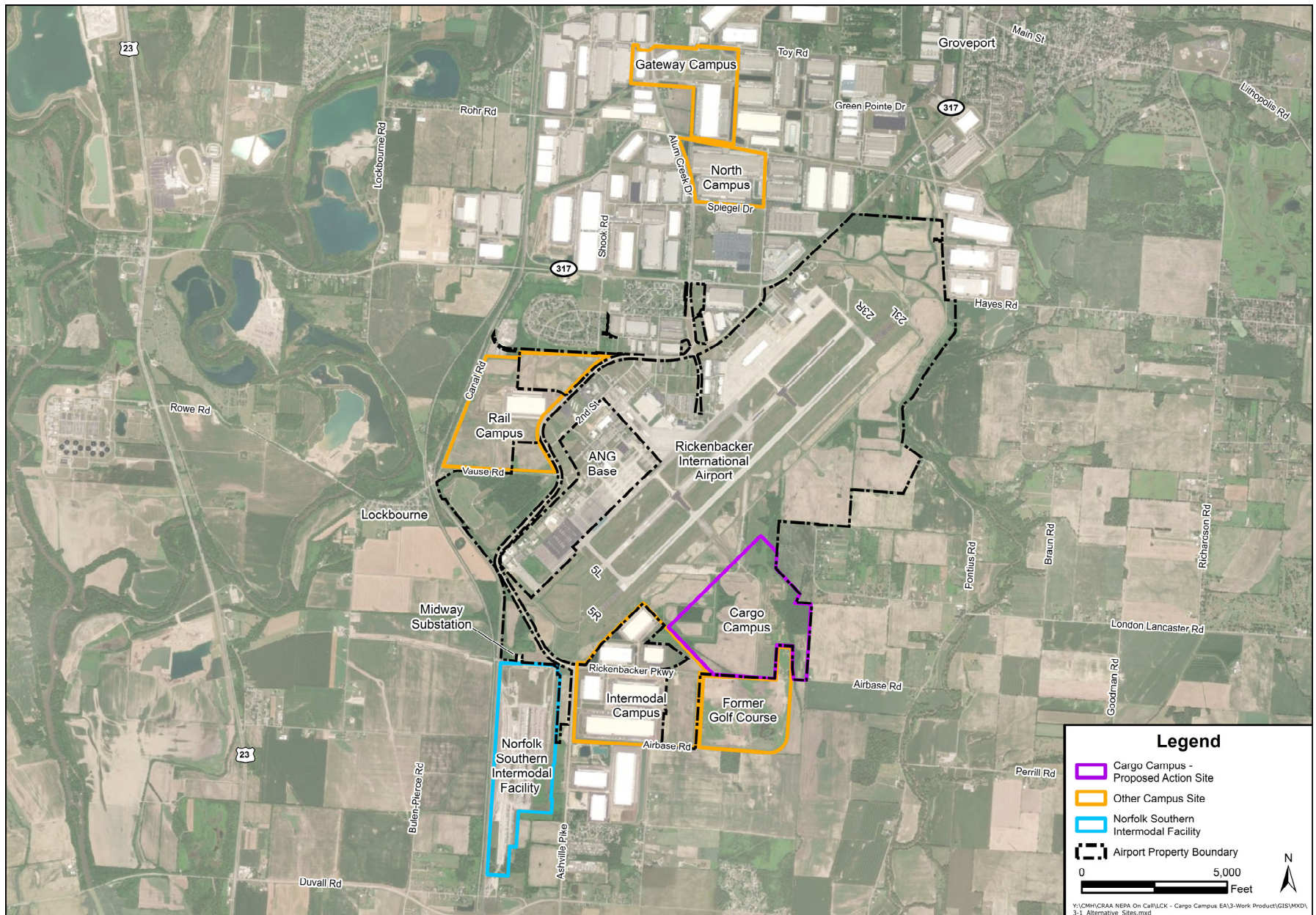
Intermodal Campus (including former Golf Course)

The Intermodal Campus includes the former Landings at Rickenbacker Golf Course that was privately owned and operated before the golf course was closed, and the property was acquired by the CRAA in 2015. The Intermodal Campus is partially built out. The remaining land is expected to be built out with new bulk distribution warehouses and stormwater mitigation facilities; however, there is not sufficient land area to meet the size and configuration needs of the developer. Therefore, this site is not carried forward for detailed evaluation.

Rail Campus

This campus is partially built out and as shown on Exhibit 3-1, construction is underway in the middle of the campus. The remaining land is expected to be built out; however, there is not sufficient land area to meet the size and configuration needs of the developer. Therefore, this site is not carried forward for detailed evaluation.

Exhibit 3-1 – Non-Aviation Development Sites Owned by CRAA



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3.3 Alternatives Carried Forward for Detailed Evaluation

Alternative A: No Action

To satisfy the intent of NEPA, FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*; FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; and other special purpose environmental laws, a No Action alternative is carried forward in the analysis of environmental consequences provided in **Chapter Five, Environmental Consequences**. With the No Action alternative, the Cargo Campus would remain undeveloped.

The No Action does not meet the stated purpose and need for this project. Although not always reasonable, feasible, prudent, nor practicable, the No Action alternative is a required alternative under NEPA and serves as the baseline for the assessment of future conditions/impacts.

Alternative B: Proposed Action

As described in Chapter One, and shown on Exhibit 1-2, the Proposed Action includes:

- Site preparation of the Cargo Campus site which measures approximately 330 acres in size and is located south of LCK;
- Extension of Rickenbacker Parkway Phases: 3b, and 4;
- Construction and operation of five commercial bulk distribution warehouse buildings totaling approximately 4.2 million square feet in area on the Cargo Campus;
- Construction of paved parking and internal vehicle circulation roads;
- Extension of utilities to and within the site; and
- Development of stormwater mitigation areas.

The Proposed Action meets the need to accommodate the demand for commercial/industrial facilities that include bulk distribution warehouses with access to air cargo facilities and an intermodal terminal, within the Columbus Region.

The CRAA coordinated with the developer to prepare a site plan that avoids environmental resources within the Cargo Campus to the extent practical as described in Section 5.3.1.

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4 Affected Environment

Pursuant to the environmental documentation requirements of Federal Aviation Administration (FAA) Orders 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, and 1050.1F, *Environmental Impacts, Policies, and Procedures*, this affected environment section succinctly describes the existing environmental conditions of the potentially affected geographic area for the proposed construction of the Cargo Campus Development at Rickenbacker International Airport (LCK or Airport).

4.1 Environmental Setting and Proposed Action Site

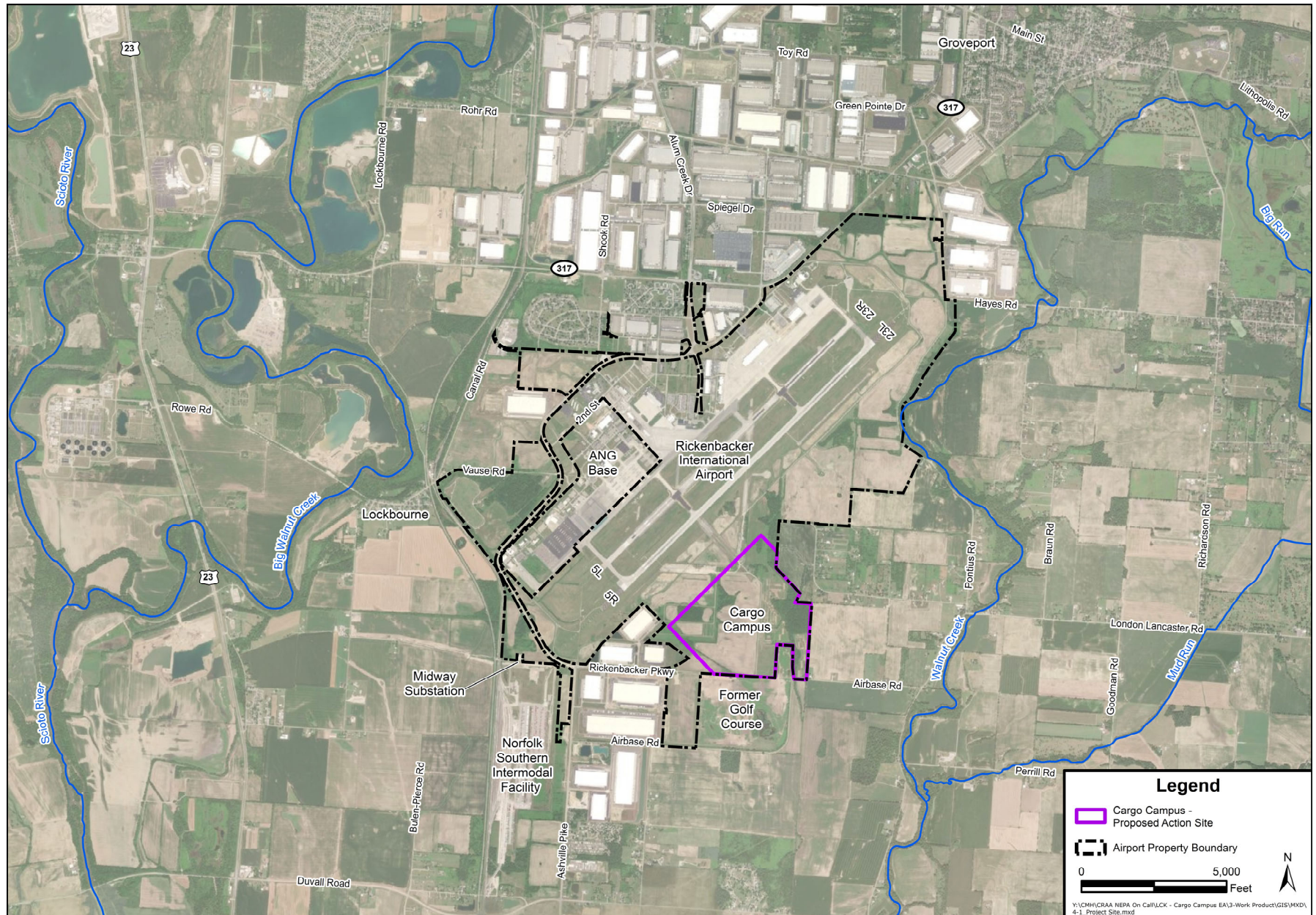
The Cargo Campus Development (the Proposed Action) is located in Franklin and Pickaway counties, southeast of Columbus, Ohio. The Proposed Action consists of the development of several commercial bulk cargo distribution warehouse facilities and infrastructure improvements as described in Chapter One, *Proposed Action*. The Proposed Action site is an approximately 330-acre site known as the Cargo Campus, which is located to the southeast of LCK. The Proposed Action would occur on property that is currently owned by the Columbus Regional Airport Authority (CRAA). LCK encompasses over 4,000 acres of land and is situated east of the Scioto River, west of Walnut Creek, and south of Interstate-270 (see **Exhibit 4-1, Proposed Action Site**).

The Proposed Action site is located approximately 1,800 feet to the south of Runway 05R/23L, which is one of two parallel runways at LCK. The Proposed Action site is bordered to the north by the airfield at LCK, agricultural fields and a rural residential area to the northeast and east, the former Landings at Rickenbacker Golf Course to the south, and the Intermodal Campus development to the west. Surface vehicle access and utilities are available from Rickenbacker Parkway, which will be extended east along the south side of the Proposed Action site, along the current alignment of Airbase Road/Wright Road (an interior perimeter road). Land uses in the immediate vicinity of the Proposed Action site include single-family residential, agricultural, and commercial/warehouse development.

The general area surrounding LCK and the Proposed Action site is a mix of residential areas with single-family and multi-family units, commercial development including businesses and offices, and public use including schools, churches, and recreational lands. Overall, the residential use is low density with the exception of areas to the north and northeast. The town of Lockbourne is located one mile northwest of the Proposed Action site and the town of Groveport is located approximately three miles northeast of the Proposed Action site.

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Exhibit 4-1 – Proposed Action Site



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4.2 Resources Potentially Affected

The No Action and Proposed Action do not have the potential to affect the following environmental resource categories because the resources are not present: coastal resources and wild and scenic rivers. Therefore, no discussion of the existing conditions related to these categories is included in this chapter. The Proposed Action has the potential to include impacts to the following resource categories:

- Air Quality;
- Biological Resources;
- Climate;
- Department of Transportation Act, Section 4(f);
- Farmland;
- Hazardous Materials, Solid Waste, and Pollution Prevention;
- Historical, Architectural, Archaeological and Cultural Resources;
- Land Use;
- Natural Resources and Energy Supply;
- Noise and Noise-Compatible Land Use;
- Socioeconomics, Environmental Justice, and Children's Health and Safety Risks;
- Visual Effects; and
- Water Resources (including Wetlands, Floodplains, Surface Waters, and Groundwater).

The current conditions for each of these resource categories are described in the following sections.

4.2.1 Air Quality

LCK is located in Franklin and Pickaway Counties, which are included in the Metropolitan Columbus Intrastate Air Quality Control Region (Columbus AQCR).⁴ The U.S. Environmental Protection Agency (USEPA) has designated the Franklin County as maintenance for ozone (O₃) and maintenance for fine particulate matter (PM_{2.5}). The Primary Annual PM_{2.5} (1997) National Ambient Air Quality Standards (NAAQS) was revoked effective October 24, 2016.⁵ Franklin County is designated attainment for all other Federally regulated pollutants, which are carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), coarse particulate matter (PM₁₀), and lead (Pb).⁶ Pickaway County is designated attainment for all criteria pollutants.

4.2.2 Biological Resources

The Proposed Action site features include some older, paved surface roadways that were formerly used as part of airport operations that are no longer in use, mowed and maintained grassy areas, leased agricultural fields, and a small, low growth wooded area near the east side of the site. Information provided by the U.S. Fish and Wildlife Service (USFWS) and the Ohio Department of Natural Resources (ODNR) report that the Proposed Action site, located in Franklin County and Pickaway County, is within the range of a number of threatened or endangered species as shown in **Table 4-1, State and Federal Threatened and Endangered Species**.

⁴ U.S. Environmental Protection Agency (USEPA), 40 CFR § 81.200, Metropolitan Columbus Intrastate Air Quality Control Region, (e-CFR data current as of December 31, 2020).

⁵ PM-2.5 NAAQS SIP Requirements Final Rule, effective October 24, 2016. (81 FR 58009).

⁶ USEPA Nonattainment Status for Each county by Year for Ohio, (Current as of December 31, 2020). Accessed on January 4, 2021 via https://www3.epa.gov/airquality/greenbook/anayo_oh.html

Table 4-1 – State and Federal Threatened and Endangered Species

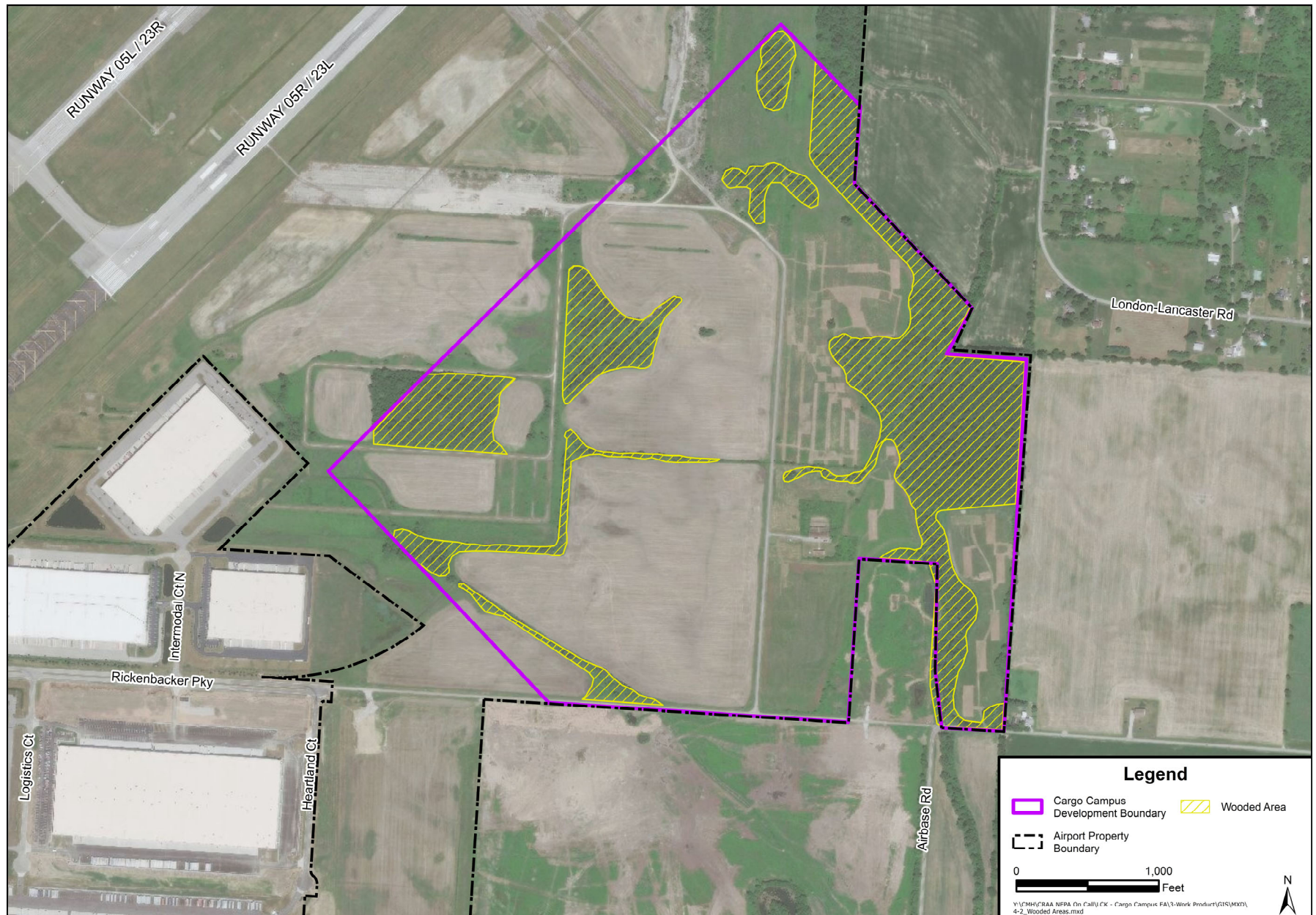
Common Name	Scientific Name	Federal Status	Ohio Status
Indiana bat	<i>Myotis sodalis</i>	E	E
Northern long-eared bat	<i>Myotis septentrionalis</i>	T	T
Scioto madtom	<i>Noturus trautmani</i>	E	E
Clubshell mussel	<i>Pleurobema clava</i>	E	E
Northern riffleshell mussel	<i>Epioblasma torulosa rangiana</i>	E	E
Rabbitsfoot mussel	<i>Quadrula cylindrica</i>	T	T
Rayed bean mussel	<i>Villosa fabalis</i>	E	E
Running buffalo clover	<i>Trifolium stoloniferum</i>	E	NL
Snuffbox mussel	<i>Epioblasma triquetra</i>	E	E
Round pigtoe	<i>Pleurobema sintoxia</i>	NL	SC
Tippecanoe darter	<i>Etheostoma tippecanoe</i>	NL	T
Popeye shiner	<i>Notropis ariommus</i>	NL	E
Northern brook lamprey	<i>Ichthyomyzon fossor</i>	NL	E
Spotted darter	<i>Etheostoma maculatum</i>	NL	E
Shortnose gar	<i>Lepisosteus platostomus</i>	NL	E
Tonguetied minnow	<i>Exoglossum laurae</i>	NL	T
Paddlefish	<i>Polyodon spathula</i>	NL	T
Upland sandpiper	<i>Bartramia longicauda</i>	NL	E

Note: E = Endangered Species; T = Threatened; PE = Proposed Endangered Species; C = Candidate Species;
SC = Species of Concern; NL = Not Listed

Source: U.S. Fish and Wildlife Service and Ohio Department of Natural Resources records, July 22, 2020.

A habitat field survey conducted in November 2019 within the Proposed Action site identified suitable summer habitat for the Indiana bat and northern long-eared bat. Summer habitat for these species consists of trees with exfoliating bark or crevices or cavities or hollow areas formed from broken branches located in upland areas or riparian corridors. The Proposed Action site includes approximately 74 acres of wooded areas as shown in **Exhibit 4-2, Wooded Areas**. Based on guidance from the USFWS, an acoustic survey was conducted in July 2020 to determine if Indiana bats and/or northern long-eared bats are present within the site. The results of that survey determined that Indiana bats and northern long-eared bats are unlikely to be present within the Proposed Action site. More information, including a copy of the survey report, is included in **Appendix B, Biological Resources**.

Exhibit 4-2 – Wooded Areas



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4.2.3 Climate

Of growing concern is the impact of proposed projects on climate change. Greenhouse gases (GHGs) are those that trap heat in the earth's atmosphere. Both naturally occurring and anthropogenic (man-made) GHGs include water vapor, carbon dioxide (CO₂),⁷ methane (CH₄), nitrous oxide (N₂O), and O₃.⁸

Research has shown that there is a direct link between fuel combustion and GHG emissions. Therefore, sources that require fuel or power at an airport are the primary sources that would generate GHGs. Aircraft are probably the most often cited air pollutant source, but they produce the same types of emissions as cars. Aircraft jet engines, like many other vehicle engines, produce CO₂, water vapor, nitrogen oxides, carbon monoxides, oxides of sulfur, unburned or partially combusted hydrocarbons (also known as volatile organic compounds (VOCs)), particulates, and other trace compounds.

According to most international reviews, aviation emissions comprise a small but potentially important percentage of human-made GHGs and other emissions that contribute to global warming. The Intergovernmental Panel on Climate Change (IPCC) estimates that global aircraft emissions account for approximately 3.5 percent of the total quantity of GHGs from human activities.⁹ In terms of relative U.S. contribution, the U.S. General Accounting Office (GAO) reports that aviation accounts “for about three percent of total U.S. GHG emissions from human sources” compared with other industrial sources, including the remainder of the transportation sector (23 percent) and industry (41 percent).¹⁰

4.2.4 Department of Transportation Act Section 4(f)

The Proposed Action site includes the site of the former privately-owned Landings at Rickenbacker Golf Course. The golf course was closed prior to the acquisition of the property by the CRAA in 2015. There are no publicly owned parks, recreation areas, or wildlife and waterfowl refuges located within the Proposed Action site. Potential historic sites are discussed in **Section 4.2.7**.

4.2.5 Farmland

The Proposed Action site is entirely owned by the CRAA. Portions of the property are leased to a local farmer for farming. Approximately 80% of the Proposed Action site is currently used for crop production. According to the Natural Resources Conservation Service (NRCS), the Proposed Action site contains prime or unique farmland which is defined as having an optimal combination of physical and chemical characteristics including soil type, growing season, and natural water supply. In Franklin County, the Proposed Action site includes 0.2 acres of prime and unique farmland. In Pickaway County, the Proposed Action site includes 177.5 acres of prime and unique farmland. None of the site is currently enrolled in an agricultural district or protected from development by Ohio Revised Code (ORC) 929.05(A).

⁷ All greenhouse gas inventories measure carbon dioxide emissions. Beyond carbon dioxide, GHG inventories may vary according to other greenhouse gases (GHGs) assessed.

⁸ Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also greenhouse gases, but they are, for the most part, solely a product of industrial activities. For example, chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) are halocarbons that contain chlorine while halocarbons that contain bromine are referred to as bromofluorocarbons (i.e. halons) or sulfur hexafluoride (SF₆).

⁹ IPCC Report as referenced in U.S. General Accounting Office (GAO) Environment: Aviation's Effects on the Global Atmosphere Are Potentially Significant and Expected to Grow; GAO/RCED-00-57, February 2000, p. 4.

¹⁰ Ibid, p. 14; GAO cites available EPA data from 1997.

4.2.6 Hazardous Materials and Solid Waste

The site of LCK was originally Lockbourne Army Air Base which was opened in June 1942. Throughout the 1950s and 1960s, the size of the base doubled to approximately 4,400 acres. In 1974 the facility was renamed Rickenbacker Air Force Base. In the 1980s, the facility was converted to civilian use under the management of the Rickenbacker Port Authority (RPA), which later merged to become the CRAA.

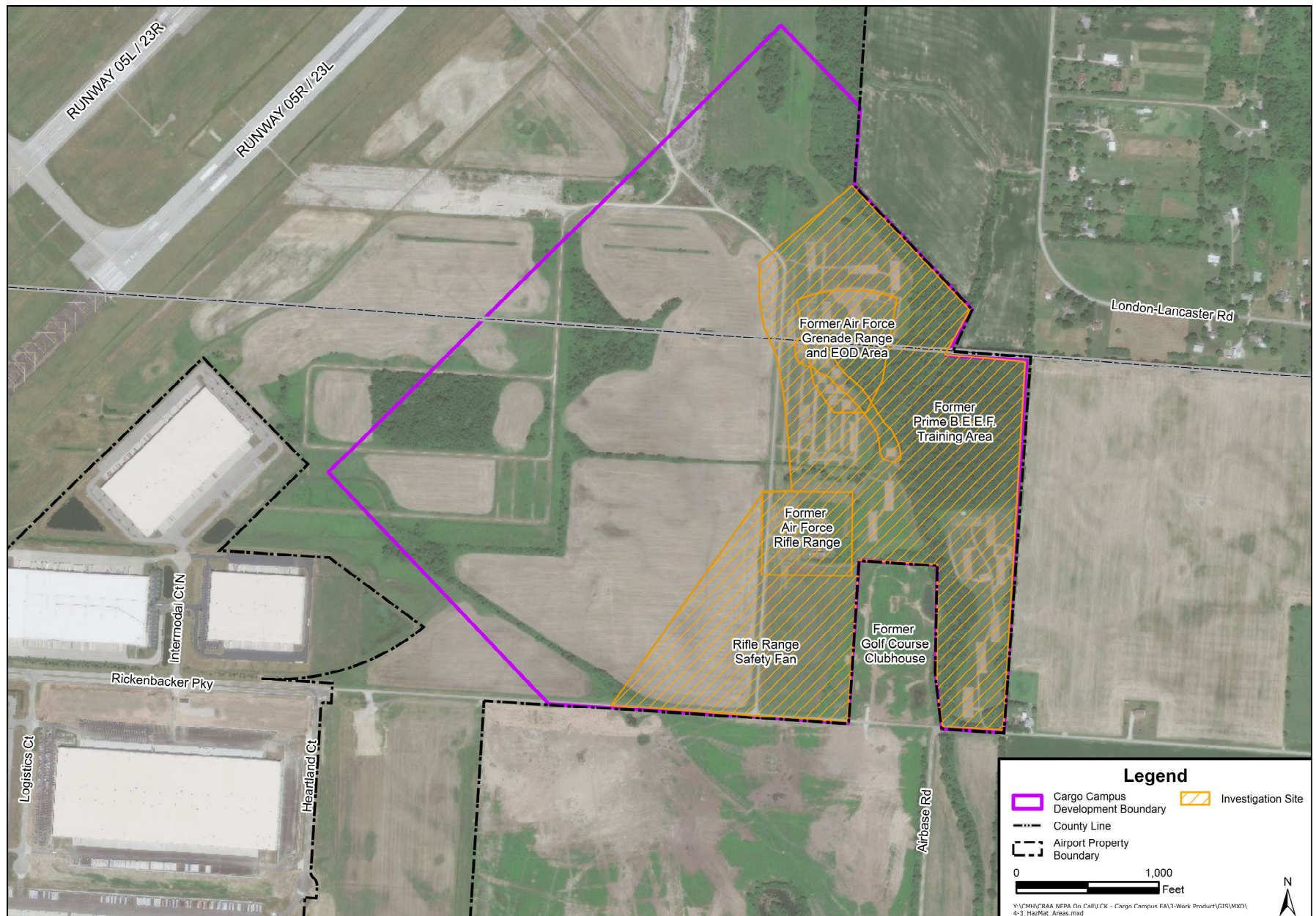
Several site investigations have been conducted within the former Air Force Base property that identified areas of concern, including sites within the Proposed Action site. In June 2020, a Feasibility Study Report and Remedial Investigation Report were prepared for the U.S. Army Corps of Engineers (USACE) that was tasked with identifying areas of concern to investigate at the former Rickenbacker Air Force Base at LCK. The investigation identified the need for completing remedial activities at three munitions response sites (MRSs) and training areas. This investigation included the following sites within the Cargo Campus:

- Air Force Explosive Ordnance Disposal (EOD) Area
- Grenade Range
- 200-Yard Rifle Range and
- Rifle Range Safety Fan
- Prime B.E.E.F. Training Area

Exhibit 4-3, *Hazardous Material Investigation Sites*, shows the location of these investigation sites within the Proposed Action site. The results of that study determined that adverse health effects from human and ecological exposure to chemical munitions constituents in the soil are not expected, and no further investigation on the basis of potential human health or ecological risk is warranted. The study did identify potential risk from explosive ordnance material and recommended further action. The USACE is currently completing remediation on the two MRSs within the Proposed Action site, and remediation is expected to be completed before construction of the Proposed Action.

With the exception of the land surrounding the former Landings at Rickenbacker Golf Course clubhouse, which was not part of the former Rickenbacker Air Force Base, all other areas within the Proposed Action site were determined to not require further investigation by the USACE. The former Landings at Rickenbacker Golf Course clubhouse was connected to an on-site sanitary sewage treatment system with a wastewater lagoon that was closed some time after the golf course closed. No petroleum storage tanks or spills have been reported on the Proposed Action site. There are no other known hazardous material sites within the Proposed Action site.

Exhibit 4-3 – Hazardous Material Investigation Sites



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4.2.7 Historical, Architectural, Archaeological, and Cultural Resources

Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended, requires Federal agencies to consider the effects of their projects on cultural sites listed on or eligible for inclusion on the National Register of Historic Places (NRHP). The Archaeological and Historic Preservation Act of 1974 provides for the preservation of historic American sites, buildings, objects, and antiquities of national significance by providing for the survey, recovery, and preservation of historical and archaeological data which might otherwise be destroyed, or irreparably lost due to Federal, Federally-licensed, or Federally-funded actions. The Department of the Interior's (DOI's) Standards and Guidelines (48 FR 44716, September 29, 1983) advises Federal agencies on implementation of this law.

The Area of Potential Effects (APE) for the Proposed Action is shown on **Exhibit 4-4, Area of Potential Effects**. The APE includes the Direct APE, including areas that would be developed for the Cargo Campus that would be subject to ground disturbance and other physical effects; as well as the Indirect APE that would potentially be affected by visual and other secondary effects.

Several field investigations have been conducted within and around the APE to identify the presence of potentially significant historic or archaeological resources. A Phase I Cultural Resources survey was completed within the Proposed Action site in 2005. This survey area included most of the Direct APE. That field investigation identified 35 archaeological sites and 16 buildings within the survey area. The results of this survey were submitted to the Ohio State Historic Preservation Office (SHPO) for review and comment in 2005. A letter from the SHPO dated June 5, 2005, noted that one archaeological site, 33-PI-757, was recommended for additional Phase II surveying; and the other properties were determined to not meet the criteria for listing on the NRHP. A Phase II survey was conducted for site 33-PI-757 in 2007 and submitted to the SHPO for review. In a letter dated June 3, 2008, the SHPO concluded that site 33-PI-757 does not meet the criteria for listing on NRHP.

Additional field investigations were conducted for this EA within areas of the Direct APE that had not been previously surveyed. This investigation included a Phase I Archaeological Survey of an 9.1-acre site that was the location of the former Landings at Rickenbacker Golf Course clubhouse. This property was acquired by the CRAA in 2015 and had not been previously surveyed. Therefore, a Phase I Cultural Resources Survey was conducted within this site in June 2020. This survey found no significant resources that would be potentially eligible for the NRHP.¹¹ A copy of the survey report was sent to the SHPO for review and comment. In a letter dated October 26, 2020, SHPO concurred that the site did not contain significant resources and no additional investigation was necessary. A copy of the Phase I Survey Report and correspondence with the SHPO are included in **Appendix C, Historic, Architectural, Archaeological, and Cultural Resources**.

Additional field reconnaissance was conducted in June 2020 to identify potentially historic structures within the Indirect APE. This field survey identified several residential and agricultural properties within the Indirect APE. A review of these properties identified four structures fifty years old or greater located within the Indirect APE along London-Lancaster Road adjacent to the northeast corner of the Proposed Action site that had not been previously surveyed. The survey also found three additional properties on Airbase Road just east of the Proposed Action site that had been inventoried in 2019. None of the houses or buildings were deemed to have historical significance and were recommended as not eligible for the NRHP.¹² Supporting information about the review of these properties was sent to the SHPO for review and comment.

¹¹ ASC Group, Inc., Phase I Archaeological Survey: Addendum for the Rickenbacker Global Logistics Park, Cargo Campus Environmental Assessment in Madison Township, Pickaway County, Ohio. September 2020.

¹² ASC Group, Inc., Section 106 Project Summary Form Supporting Information for the Rickenbacker Global Logistics Park, Cargo Campus Environmental Assessment in Madison Township, Franklin County and Madison Township, Pickaway County, Ohio. July 10, 2020.

In a letter dated October 26, 2020, SHPO concurred that the properties identified in the report are not eligible for listing in the NRHP. A copy of the report and correspondence with the SHPO is included in Appendix C.

No historic properties that are eligible for the NRHP have been identified in the APE. Copies of the correspondence between the FAA and SHPO with more information about this determination are included in Appendix C.

4.2.8 Land Use

The Proposed Action would occur entirely on Airport property in southern Franklin County and northern Pickaway County. The site is surrounded by commercial and aviation land uses to the north and west, a former golf course to the south, and rural residential properties to the east, as shown in **Exhibit 4-5, Existing Land Use**. The Proposed Action site features include undeveloped land that is leased for agriculture, a former golf course clubhouse, and a former U.S. Air Force firing range. The nearest residential land uses are located on Airbase Road immediately southeast of the Proposed Action site. Other nearby residential areas are located along London-Lancaster Road approximately 350 feet northeast from the Proposed Action site. Within Franklin County, the Cargo Campus property is zoned for General Industrial use. Within Pickaway County the Cargo Campus property is zoned as Rickenbacker Business Development District (RBD).

4.2.9 Natural Resources and Energy Supply

The Columbus region and area surrounding LCK is a well-developed urban area with adequate access to natural resources for construction projects. The Proposed Action site is served by local utility companies including AT&T, South Central Power, Columbia Gas, and the City of Columbus Department of Public Utilities. The City of Columbus has constructed a 24-inch water main along Rickenbacker Parkway to the Franklin and Pickaway County border. An 18-inch water line extends from there to the intersection of Rickenbacker Parkway and Heartland Court.¹³ The City of Columbus is constructing a 54-inch sanitary sewer known as the Intermodal Sanitary Subtrunk Extension (ISSE) to serve the Northern Pickaway Joint Economic Development District.¹⁴ Telecommunications service is provided by AT&T via a conduit line that runs along Rickenbacker Parkway. Electricity is provided to the area by South Central Power, which operates the Midway Substation approximately 1,800 feet west of the intersection of Rickenbacker Parkway and Ashville Pike. Distribution Lines extend east along Rickenbacker Parkway adjacent to the south side of the Cargo Campus. A medium pressure natural gas line runs along Rickenbacker Parkway to a point near Intermodal Court.¹⁵

4.2.10 Noise and Noise-Compatible Land Use

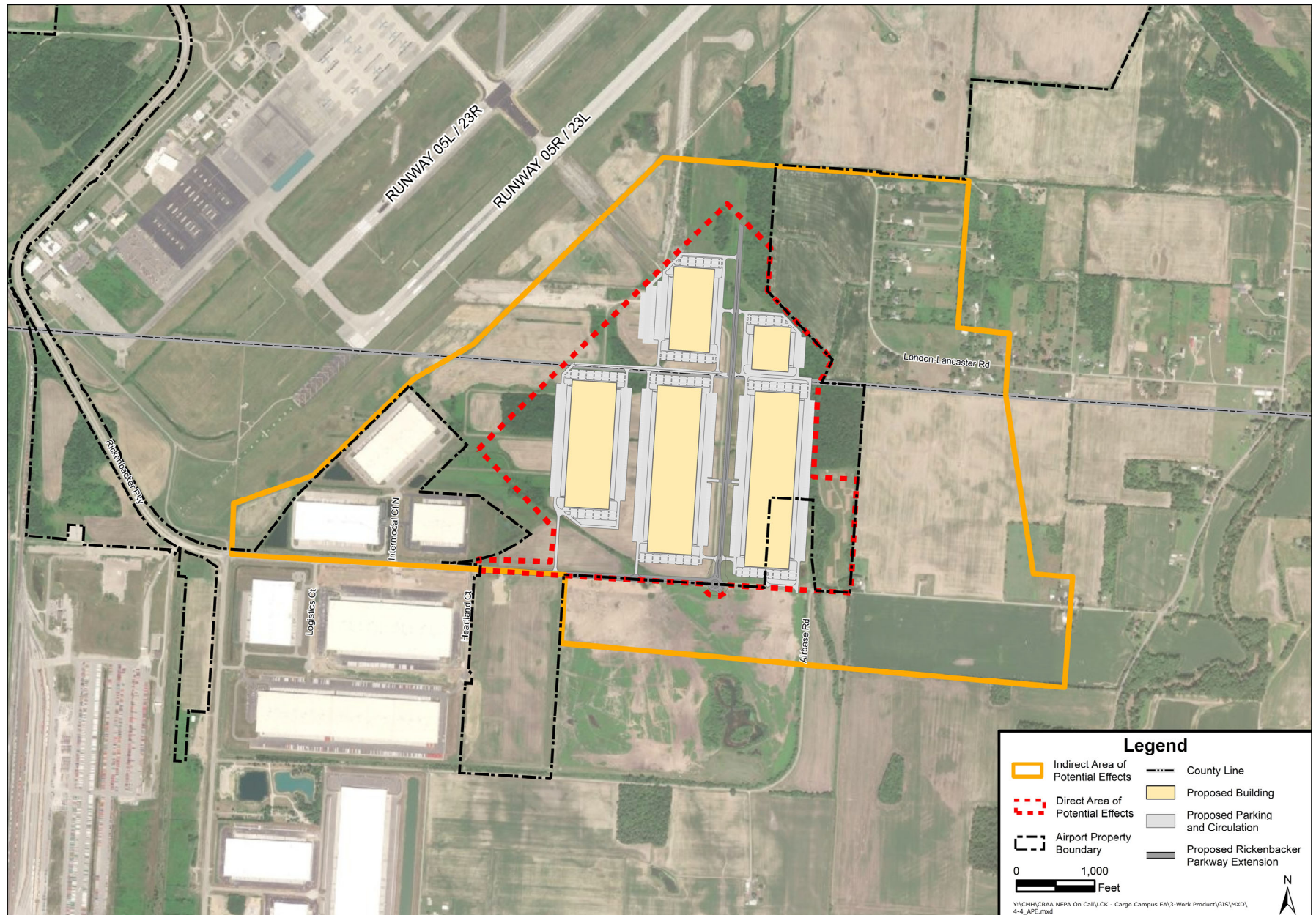
The Proposed Action site is located south of the LCK airfield and is subject to noise from aircraft and the surrounding airfield. The Proposed Action site is located east of the Norfolk Southern Intermodal Facility and commercial and warehouse facilities within the Intermodal Campus. Trucks and vehicles accessing these developments also contribute to noise in the area. The Proposed Action would not cause unforecasted growth in aircraft activity, nor would it cause a change in fleet mix or a permanent change in runway use patterns, taxi time, or airfield delay. Therefore, there is no potential for changes to aircraft noise levels as a result of the Proposed Action.

¹³ Rickenbacker International Airport Master Plan, Final Draft.

¹⁴ City of Columbus, Intermodal Sanitary Subtrunk Extension (ISSE), Online at <https://www.columbus.gov/Templates/Detail.aspx?id=2147514799>, Accessed on October 1, 2020.

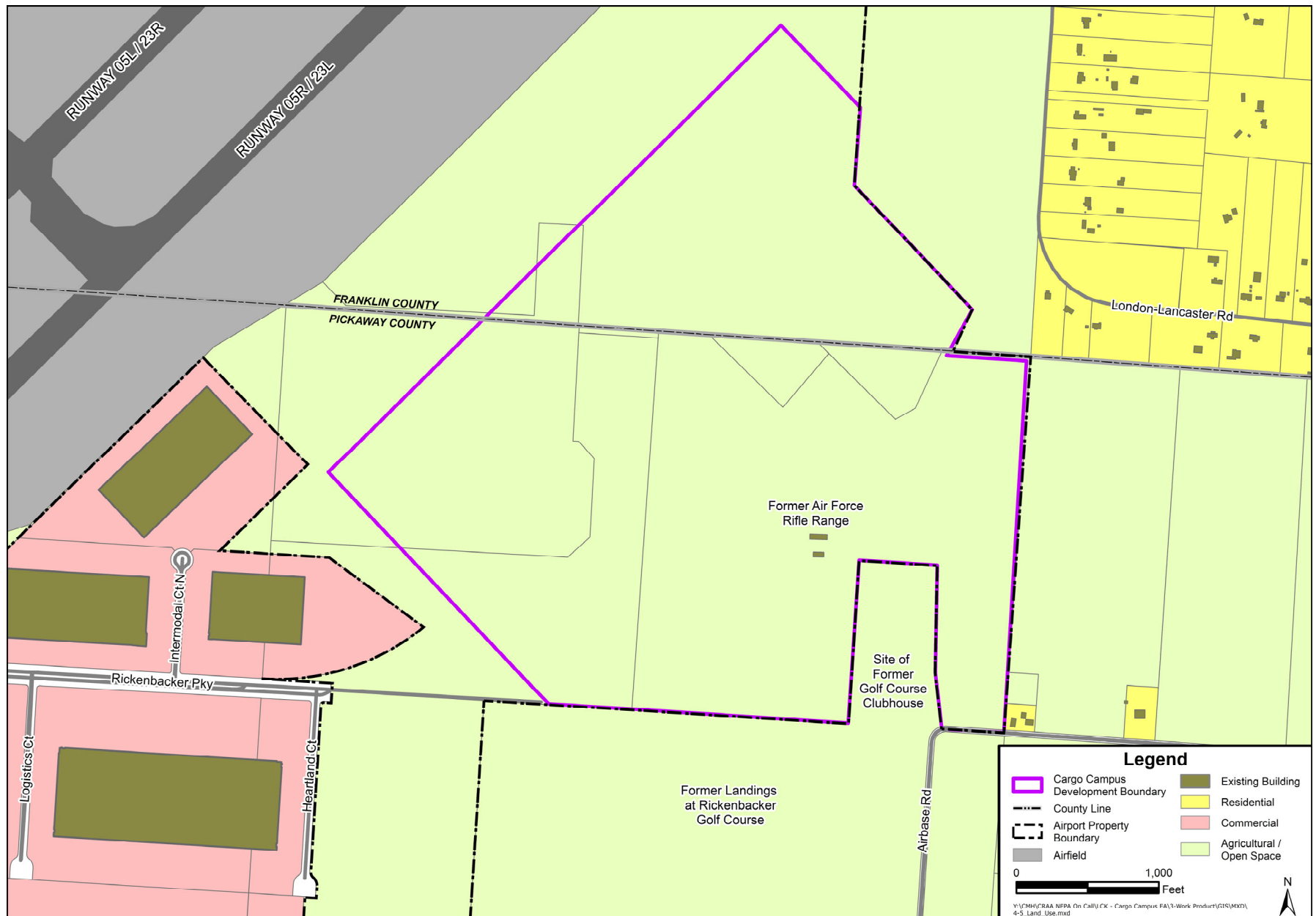
¹⁵ Rickenbacker International Airport Master Plan, Final Draft.

Exhibit 4-4 – Area of Potential Effects



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Exhibit 4-5 – Existing Land Use



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

LCK is located in Franklin and Pickaway Counties. The population of Franklin County has increased by over 12 percent since 2010 from 1,163,414 to an estimated 1,310,300 in 2018. The population of Pickaway County has increased by over four percent since 2010 from 55,698 to an estimated 58,086 in 2018. In the same timeframe, the population of the ten-county Columbus Metropolitan Statistical Area (MSA) has increased by over ten percent from 1,901,974 in 2010 to an estimated 2,106,541 in 2018.^{16,17}

Total employment in 2017 was 641,881 in Franklin County and 10,885 in Pickaway County. This represents more than a 14 percent increase in employment since 2010.¹⁸

A review of minority and low-income population data was conducted for this EA. Data was obtained from the U.S. Census Bureau for all block groups within a one-mile radius of the site of the Proposed Action. The population within those Census block groups is approximately 14 percent minority and 23 percent low income.^{19,20,21}

4.2.12 Visual Effects

The Proposed Action site is adjacent to airport land uses to the north and commercial land uses to the west. A former golf course is located to the south. The nearest residential land uses are located on Airbase Road immediately east of the Proposed Action site. Additional residences are located to the northeast of the Proposed Action site on London-Lancaster Road.

4.2.13 Water Resources

4.2.13.1 Wetlands

Wetlands are defined as areas that are inundated by surface or ground water with a frequency to support, and under normal circumstances do or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

A wetland delineation field survey was conducted within the Proposed Action site in 2015 and was updated in November 2019. Seven streams totalling approximately 9,934 linear feet and 11 wetlands encompassing 4.63 acres were identified within the study area during the field survey as listed in **Table 4-2, Streams within the Study Area**, and **Table 4-3, Wetlands within the Study Area**, and shown on **Exhibit 4-6, Wetlands and Streams**.

¹⁶ The Columbus Metropolitan Statistical Area includes Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union counties.

¹⁷ U.S. Census Bureau, *County Totals Dataset: Population, Population Change and Estimated Components of Population Change: April 1, 2010 to July 1, 2018*, Accessed on March 11, 2020 at <https://www.census.gov/data/tables/time-series/demo/popest/2010s-counties-total.html>.

¹⁸ U.S. Census Bureau, County Business Patterns (NAICS), Accessed on March 11, 2010 at <https://www.census.gov/programs-surveys/cbp/data/tables.All.html>.

¹⁹ Low-income refers to the percentage of individuals in the study area whose median household income is at or below the Department of Health and Human Services poverty guidelines (to access these guidelines for 2020 available online at: <http://aspe.hhs.gov/poverty/index.cfm>).

²⁰ U.S. Census Bureau; 2010 Census, Table QTP4: Race, Combinations of Two Races, and Not Hispanic or Latino; Accessed March 11, 2020 at: https://factfinder.census.gov/faces/nav/jsf/pages/guided_search.xhtml.

²¹ U.S. Census Bureau; American Community Survey, 2013-2017 American Community Survey 5-Year Estimates, Table B17017: Poverty Status in the Past 12 Months by Household Type by Age of Householder; Accessed March 11, 2020 at: https://factfinder.census.gov/faces/nav/jsf/pages/guided_search.xhtml.

All seven streams are unnamed tributaries to Walnut Creek, have been highly channelized and modified, and appear to drain portions of the surrounding farm fields, including portions of LCK, and access roads. **Appendix D, Wetlands**, contains the Jurisdictional Determination (JD) from that 2019 wetland delineation report. As noted in Section 5.1.13, the jurisdictional status of these water resources was revised in May 2021 in accordance with the Navigable Waters Protection Rule (NWPR) which became effective June 22, 2020.

Table 4-2 – Streams within the Study Area

Stream ID	Length Within Study Area (Linear Feet)	Description
Stream 20	2,664.81	Perennial Stream
Stream 31	501.08	Perennial Stream
Stream 34	2,267.25	Perennial Stream
Stream 35	596.16	Ephemeral Stream
Stream 36	773.58	Ephemeral Stream
Stream 37	1,140.10	Ephemeral Stream
Stream 39	1,991.51	Intermittent Stream

Source: TranSystems, *Potential Jurisdictional Waters Survey Report Rickenbacker – Air Cargo Campus*, November 2019.

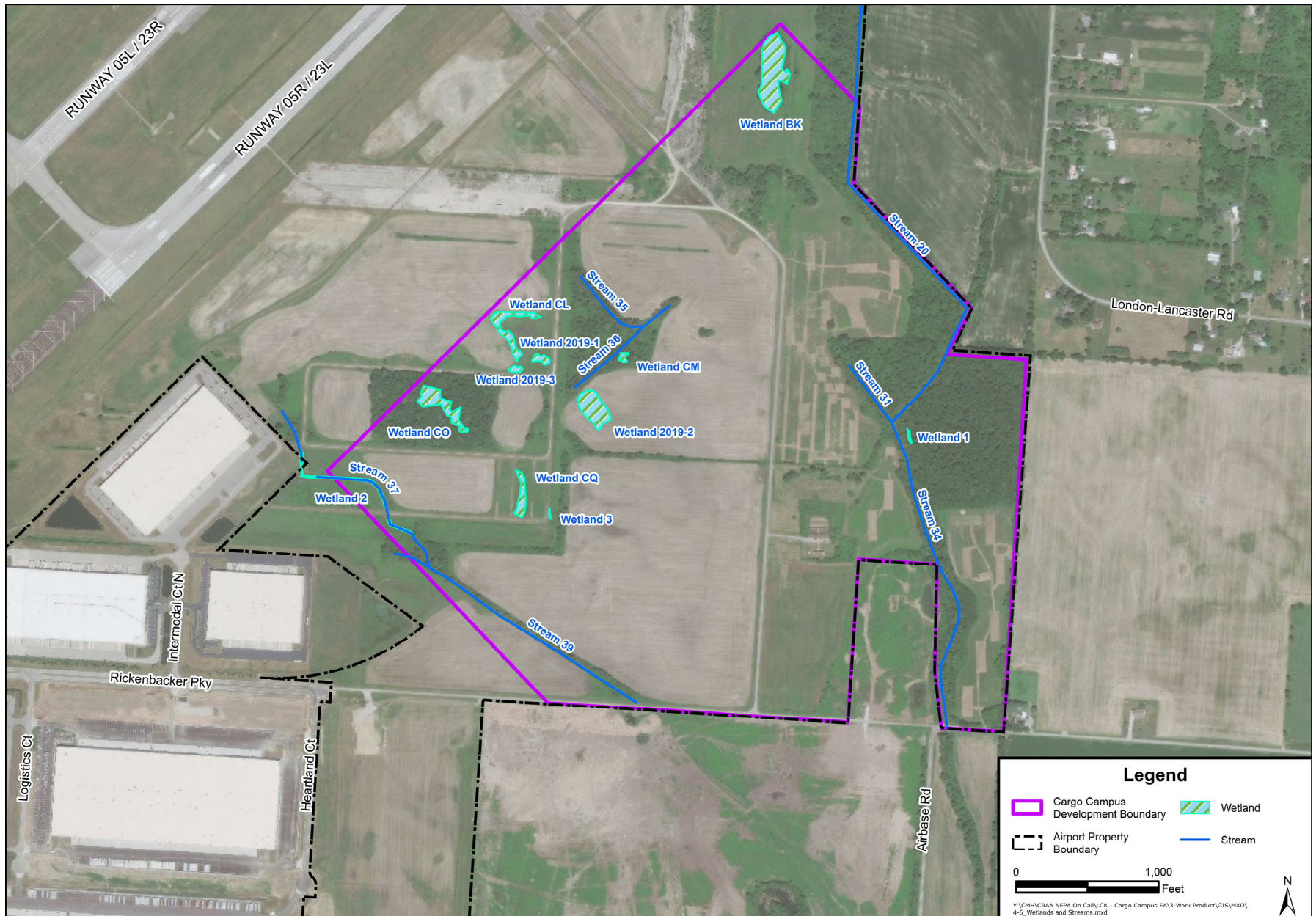
Table 4-3 – Wetlands within the Study Area

Wetland ID	Acreage	Wetland Type	Connectivity
Wetland 2019-1	0.07	PEM	Isolated
Wetland 2019-2	0.51	PEM	Isolated
Wetland 2019-3	0.04	PEM	Isolated
Wetland 1 – NEW	0.03	PFO/PSS	Connected
Wetland 2 – NEW	0.32	PEM/PSS	Isolated
Wetland 3 – NEW	0.03	PEM	Isolated
Wetland BK	1.70	PFO	Connected
Wetland CL	0.59	PEM	Isolated
Wetland CM	0.09	PFO/PSS	Isolated
Wetland CO	0.72	PFO	Isolated
Wetland CQ	0.52	PEM	Isolated

Notes: Wetland type based on Cowardin Classification system, PEM = Palustrine emergent, PFO = Palustrine forested, PSS = Palustrine scrub-shrub.

Source: TranSystems, *Potential Jurisdictional Waters Survey Report Rickenbacker – Air Cargo Campus*, November 2019.

Exhibit 4-6 – Wetlands and Streams



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4.2.13.2 Floodplains

The Proposed Action site is not located within a designated floodplain. A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs)²² indicates that all land within the Proposed Action site is located outside of a designated 100-year floodplain. As shown on **Exhibit 4-7, Floodplain Map**, the nearest 100-year floodplain is located approximately 3,500 feet away at its closest point to the east of the Proposed Action site adjacent to Walnut Creek.

4.2.13.3 Surface Waters

Drinking water in the Columbus region primarily comes from three reservoirs. The Griggs and O'Shaughnessy Reservoirs are located on the Scioto River and the Hoover Reservoir is located on the Big Walnut Creek. These three reservoirs provide 90 percent of the more than 140 million gallons of water used daily in the Columbus area. The remaining 10 percent is drawn from the wells in southern Franklin County.²³

The Proposed Action site includes several streams, as shown in Exhibit 4-6, which drain from northwest to southeast. The streams drain to Walnut Creek at a point southeast of the Proposed Action site. The site is within the Big Run-Walnut Creek watershed (HUC 05060001-18-05).

4.2.13.4 Groundwater

Franklin and Pickaway County's primary ground-water sources are the unconsolidated sand and gravel deposits and the carbonate aquifers.²⁴ Presently, the City of Columbus operates four collector wells located in the unconsolidated sand and gravel aquifers along the Scioto River and Big Walnut Creek. These wells provide approximately ten percent of the drinking water in the Columbus area. There are several privately-owned water wells to the east and northeast of the Proposed Action site along Airbase Road and London-Lancaster Road. Additional wells are located to the southwest of the Proposed Action site along Ashville Pike.²⁵ There are no sole source aquifers as designated by the USEPA located in Franklin County or Pickaway County.²⁶

²² Federal Emergency Management Agency, FIRMs, Panel Numbers 39129C0075J.

²³ City of Columbus, *Water Supply and Source Management History*; Accessed January 5, 2021 at: <https://columbus.gov/Templates/Detail.aspx?id=16077>.

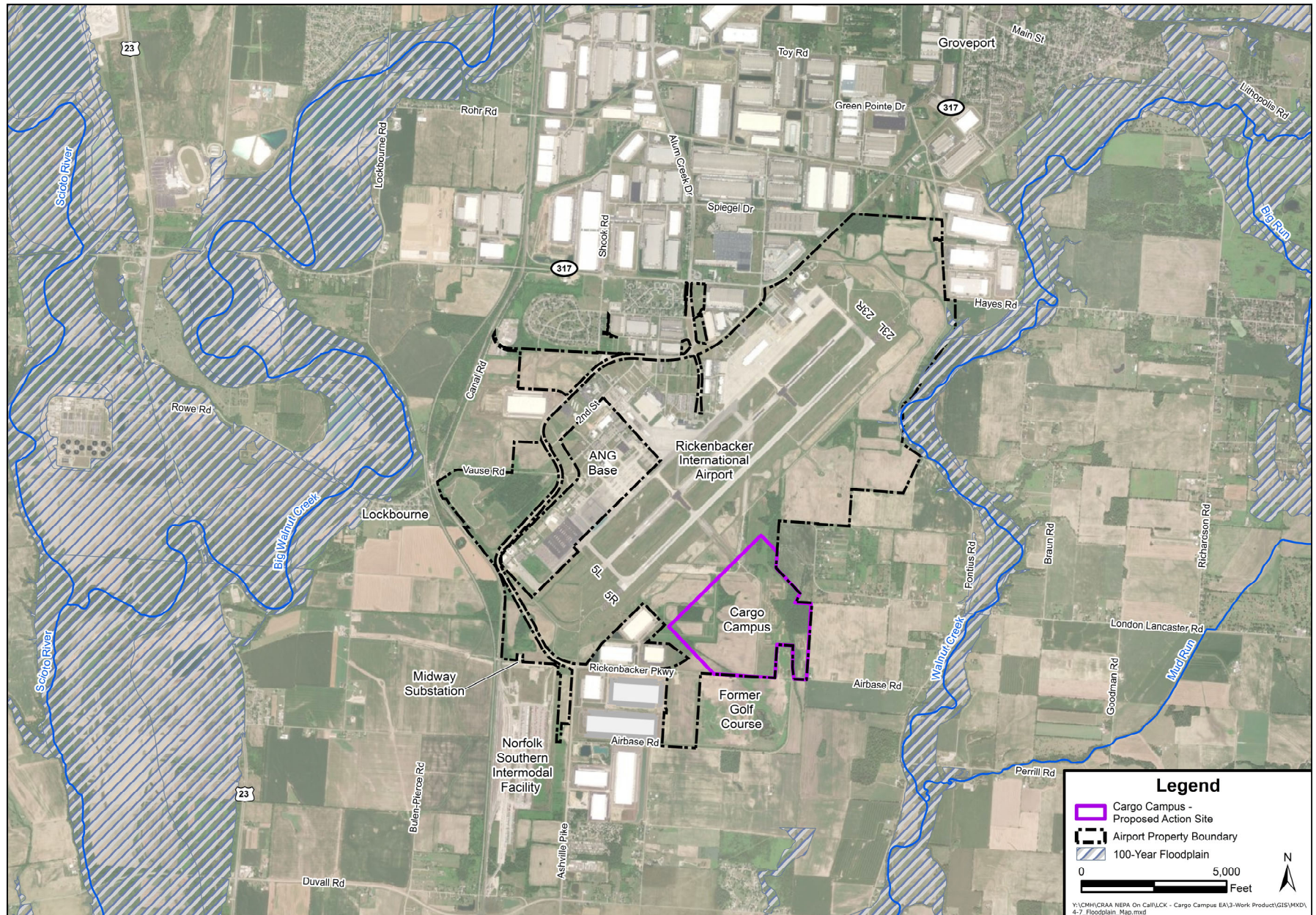
²⁴ Ohio Environmental Protection Agency, *Ambient Ground Water Quality Monitoring Program Wells*; Accessed May 28, 2020 at: <https://data-oepra.opendata.arcgis.com/datasets/ambient-ground-water-quality-monitoring-program-wells?geometry=-83.400%2C39.703%2C-82.357%2C39.887>.

²⁵ ODNR – Division of Geological Survey, Ohio Water Wells, Accessed January 5, 2021 at: <https://gis.ohiodnr.gov/MapView/?config=waterwells>.

²⁶ U.S. EPA, *Map of Sole Source Aquifer Locations*; Accessed October 10, 2020 at: <https://www.epa.gov/dwssa/map-sole-source-aquifer-locations>.

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Exhibit 4-7 – Floodplain Map



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5 Environmental Consequences

This chapter presents the assessment of environmental impacts addressed in considering reasonably foreseeable environmental consequences of the Proposed Action and the No Action alternative. As required by the Federal Aviation Administration (FAA) Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Projects*, and FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, the environmental categories listed below are addressed in this Environmental Assessment (EA). Construction activities could result in potential impacts to multiple categories. Per FAA Order 1050.1F, the assessment of potential construction related impacts is discussed where applicable for each of the categories listed.

As discussed in Chapter Four, *Affected Environment*, the No Action and Proposed Action do not have the potential to affect the following categories because the resources do not exist in the vicinity of the Cargo Campus (the Proposed Action site): coastal resources and wild and scenic rivers. Therefore, no discussion of potential impacts related to these categories is included in this EA.

5.1 Resources Potentially Affected

The Proposed Action has the potential to include impacts to the following resource categories:

- Air Quality;
- Biological Resources;
- Climate;
- Department of Transportation Act, Section 4(f);
- Farmland;
- Hazardous Materials, Solid Waste, and Pollution Prevention;
- Historical, Architectural, Archaeological and Cultural Resources;
- Land Use;
- Natural Resources and Energy Supply;
- Noise and Noise-Compatible Land Use;
- Socioeconomics, Environmental Justice, and Children's Health and Safety Risks;
- Visual Effects; and
- Water Resources (including Wetlands, Floodplains, Surface Waters, and Groundwater).

The potential impacts for each of these resource categories are described in the following sections.

5.1.1 Air Quality

The Clean Air Act (CAA), as amended in 1990, defines a non-attainment area (NAA) as a geographic region that has been designated as not meeting one or more of the National Ambient Air Quality Standards (NAAQS). The Proposed Action site is located within Franklin and Pickaway Counties, which are included in the Metropolitan Columbus Intrastate Air Quality Control Region (Columbus AQCR).²⁷ The U.S. Environmental Protection Agency (USEPA) has designated Franklin County as maintenance for ozone (O₃) and fine particulate matter (PM_{2.5}).²⁸ Therefore, the applicable de minimis thresholds are 100 tons per year of the ozone precursor pollutants: volatile organic compounds (VOCs) and nitrogen oxides (NO_x). Franklin County is designated attainment for all the other Federally-regulated pollutants, which are carbon monoxide (CO), sulfur dioxide (SO₂), coarse particulate matter (PM₁₀), and lead (Pb).²⁹ Pickaway County is not in non-attainment for any Federally-regulated pollutants.

Proposed Action

The potential impacts to air quality due to the Proposed Action were determined in accordance with the guidelines provided in FAA, *Aviation Emissions and Air Quality Handbook Version 3*,³⁰ and FAA Order 5050.4B, which together with the guidelines of FAA Order 1050.1F, constitute compliance with all the relevant provisions of NEPA and the CAA.

The Proposed Action would not cause unforecasted growth in aircraft activity nor would it cause a change in fleet mix or a permanent change in runway use patterns, taxi time, or airfield delay at LCK. The Proposed Action would include bulk distribution warehouse facilities that are not dependent upon air travel. Therefore, the proposed facilities would not cause an increase or decrease in operations and would not result in changes to the aircraft fleet. The Proposed Action is intended to meet existing warehouse and distribution needs in the central Ohio region. The end users of the facilities would operate warehousing and distribution facilities to meet local demand. These users may benefit from the proximity to the Airport for shipping and receiving goods. However, it is anticipated that the majority of shipping and receiving would primarily occur via truck. While some goods may be shipped inbound or outbound via air cargo carriers, it is expected that the shipping via air would utilize existing cargo capacity and would not cause an increase in the number of cargo operations at LCK. Therefore, no change in aircraft operations or emissions would occur as a result of the Proposed Action. The increase in emissions would be limited to temporary emissions from construction activity and operational emissions from surface vehicle traffic to and from the proposed warehouses.

Operation of the Proposed Action would result in indirect emissions as a result of surface vehicle traffic from trucks and employee vehicles traveling to and from the proposed distribution warehouses. This additional surface vehicle traffic was estimated based on the Institute of Transportation Engineers (ITE) trip generation methodology to determine the number of vehicles based on the proposed building square footages. Estimates of construction equipment usage was prepared using the Airport Construction Emissions Inventory Tool (ACEIT) based on the types of construction equipment required for construction of the Proposed Action. Emissions modelling of these equipment and vehicle types was prepared using the USEPA's Motor Vehicle Emissions Simulator (MOVES) Version 2014b. The emissions estimated to occur during construction and operation of the Proposed Action are provided in **Table 5-1, Proposed Action Emissions Inventory**.

²⁷ U.S. Environmental Protection Agency (USEPA), 40 CFR § 81.200, Metropolitan Columbus Intrastate Air Quality Control Region, (e-CFR data current as of March 10, 2020).

²⁸ The Primary Annual PM_{2.5} (1997) NAAQS was revoked effective October 24, 2016.

²⁹ USEPA Nonattainment Status for Each county by Year for Ohio, (Current as of December 31, 2020). Accessed on January 5, 2021 via https://www3.epa.gov/airquality/greenbook/anayo_oh.html. The Primary Annual PM_{2.5} (1997) NAAQS was revoked effective October 24, 2016 and the area is in attainment under the 2006 and 2012 standards.

³⁰ FAA, *Aviation Emissions and Air Quality Handbook Version 3 Update 1*, January 2015.

Table 5-1 – Proposed Action Emissions Inventory

Year		Criteria and Precursor Pollutants (tons per year)					
		CO	VOC	NOx	SOx	PM ₁₀	PM _{2.5}
	CAA De Minimis Thresholds	n/a	100	100	n/a	n/a	100
2022	Construction	0.3	0	0.3	0	0	0
	Operation	n/a	n/a	n/a	n/a	n/a	n/a
	Total	0.3	0	0.3	0	0	0
2023	Construction	0.9	0.6	2	0.1	0.2	0.2
	Operation	n/a	n/a	n/a	n/a	n/a	n/a
	Total	0.9	0.6	2	0.1	0.2	0.2
2024	Construction	1.7	1.5	3.2	0.1	0.3	0.3
	Operation	n/a	n/a	n/a	n/a	n/a	n/a
	Total	1.7	1.5	3.2	0.1	0.3	0.3
2025	Construction	0.7	0.9	1.1	0	0.1	0.1
	Operation	11.9	1.5	14.7	0	0.7	0.6
	Total	12.6	2.4	15.8	0	0.8	0.7
2026	Construction	0.7	0.7	1.1	0	0.1	0.1
	Operation	24.4	3.1	30.1	0	1.4	1.3
	Total	25.1	3.8	31.2	0	1.5	1.4
2027	Construction	0.7	0.5	1.1	0	0.1	0.1
	Operation	33.4	4.3	41.3	0.1	1.9	1.8
	Total	34.1	4.8	42.4	0.1	2	1.9
2028	Construction	0.7	0.3	1.1	0	0.1	0.1
	Operation	38.8	5	6.8	0.1	2.2	2.1
	Total	39.5	5.3	7.9	0.1	2.3	2.2
2029	Construction	n/a	n/a	n/a	n/a	n/a	n/a
	Operation	41.4	5.4	51.1	0.1	2.4	2.2
	Total	41.4	5.4	51.1	0.1	2.4	2.2

Notes: NOx and VOC emissions from the project are compared with the 100 tons per year de-minimis threshold. The Primary Annual PM2.5 (1997) NAAQS was revoked effective October 24, 2016 and Franklin County is in attainment for the 2006 24-hour Standard and the 2012 Annual Standard; however, the Ohio State Implementation Plan still recognizes Franklin County as maintenance for PM2.5. Therefore, net annual emissions are compared in this table to a de minimis threshold of 100 tons per year. Emissions of CO, SO2, and PM10 are provided for disclosure purposes.

Total may not sum correctly due to rounding.

Source: Landrum & Brown analysis, 2021.

More information about the air quality assessment and emissions inventory is included in **Appendix E, Air Quality**. The air quality assessment summarized in Table 5-1 demonstrates that the Proposed Action would not cause an increase in air emissions above the applicable *de minimis* thresholds.

Therefore, the Proposed Action conforms to the State Implementation Plan (SIP) and the CAA and would not create any new violation of the NAAQS, delay the attainment of any NAAQS, nor increase the frequency or severity of any existing violations of the NAAQS. As a result, no adverse impact on local or regional air quality is anticipated due to construction and operation of the Proposed Action. No further analysis or reporting is required under the CAA or NEPA.

While construction of the Proposed Action would be anticipated to contribute to fugitive dust in and around the construction site, the CAA as the sponsor would stipulate that the developer require measures be taken during construction to reduce fugitive dust emissions by adhering to guidelines included in FAA Advisory Circular 150/5370-10H, *Standards for Specifying Construction of Airports*.³¹

Methods of controlling dust and other airborne particles will be implemented to the extent possible and may include, but are not limited to, the following:

- Exposing the minimum area of erodible earth
- Applying temporary mulch with or without seeding
- Using water sprinkler trucks
- Using covered haul trucks
- Using dust palliatives or penetration asphalt on haul roads
- Using plastic sheet coverings

The developer will typically require watering during dry earthwork conditions to minimize dust. Measures to reduce construction and operational emissions would be implemented to the extent practical such as promoting the use of equipment with clean engine technologies and minimizing idling time.

No Action

The No Action alternative does not involve any construction or operational activities, therefore, would not cause any impacts to air quality.

³¹ FAA Advisory Circular, *Standards for Specifying Construction of Airports, Item P-156, Temporary Air and Water Pollution, Soil Erosion, and Siltation Control*, AC 150/5370-10H (December 21, 2018).

5.1.2 Biological Resources

Section 7 of the Endangered Species Act requires Federal agencies to assess potential impacts of a proposed Federal action upon endangered species or critical habitat. FAA Order 1050.1F states a significant impact to biological resources (including fish, wildlife, and plants) would occur when the USFWS or the National Marine Fisheries Service (NMFS) determines that the action would be likely to jeopardize the continued existence of a Federally-listed threatened or endangered species, or would result in the destruction or adverse modification of federally-designated critical habitat. The FAA has not established a threshold of significance for species of concern or non-listed species; however, the following factors should be considered, as noted in Order 1050.1F:

- A long-term or permanent loss of unlisted plant or wildlife species (i.e., extirpation of the species from a large project area);
- Adverse impacts to special status species (e.g., state species of concern, species proposed for listing, migratory birds, bald and golden eagles) or their habitats;
- Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations; or
- 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.

Proposed Action

The Proposed Action site includes approximately 74 acres of wooded areas. An approximately ten-acre wooded area is proposed to be avoided during construction.³² The Proposed Action would clear approximately 64 acres of wooded land that includes potentially suitable summer roosting habitat for the Indiana bat and northern long-eared bat as shown in **Exhibit 5-1, Potential Habitat Impacts**. As noted in Chapter 4, Section 4.2.2, an acoustic survey was conducted in accordance with USFWS guidelines in July 2020 to determine the potential for Indiana bats or northern long-eared bats to be present within the Proposed Action site. The results of the acoustic survey did not detect any signs of the protected bat species. Field surveying within the Proposed Action site did not identify any other state or federally-protected species or critical habitat. No potential adverse impacts to species protected under the Migratory Bird Treaty Act were identified for the Proposed Action. No proposed construction practices have been identified that would cause the spread of invasive species. Therefore, it was determined that the Proposed Action would not cause any significant impacts to biological resources. In correspondence dated September 21, 2020, the USFWS concurred that no adverse effects to federally endangered, threatened, proposed, or candidate species are anticipated as a result of the Proposed Action.

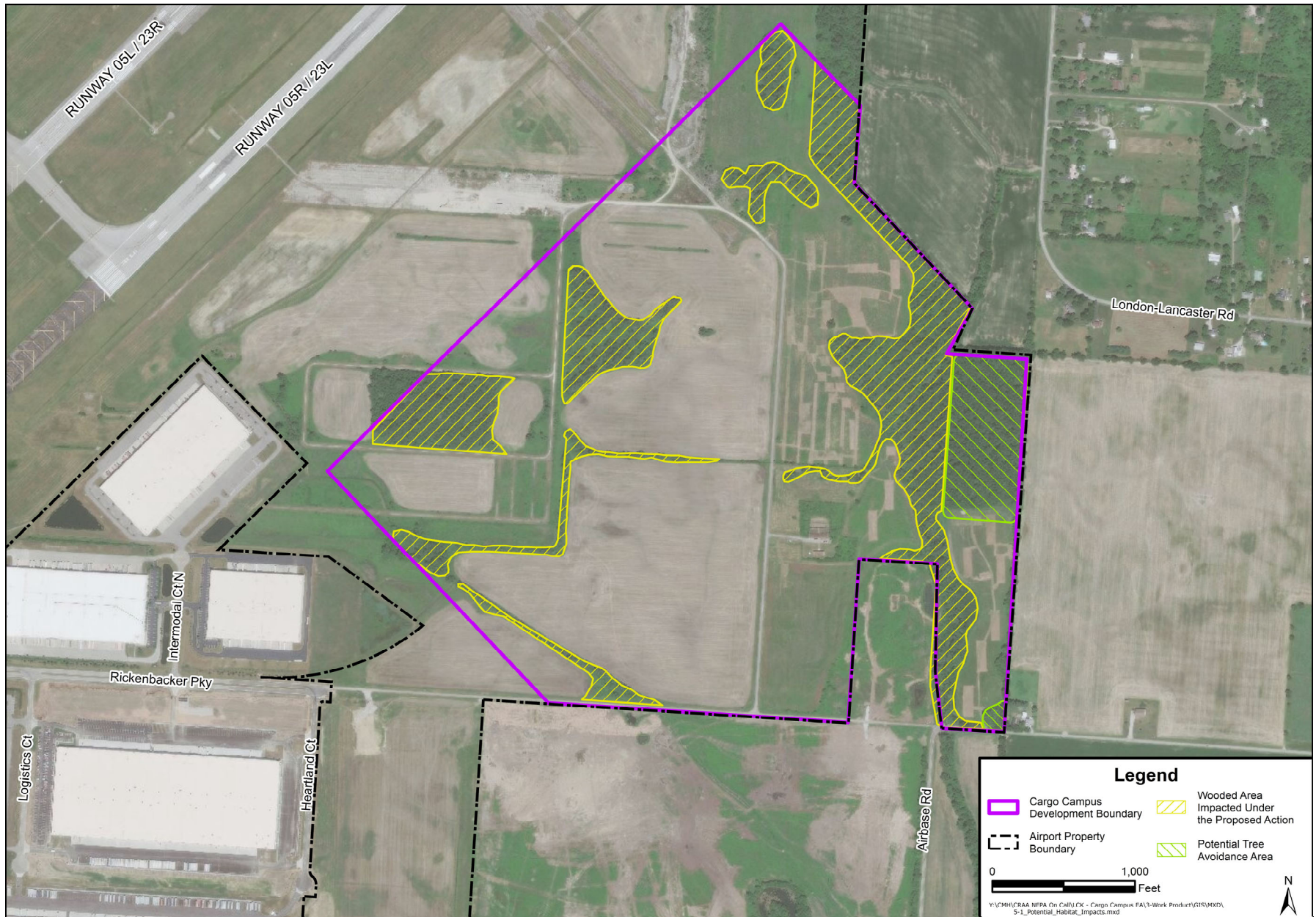
No Action

The No Action alternative does not involve any development and therefore would not cause any impacts to biological resources.

³² The CRAA and developer intend to avoid this 10-acre wooded area. The U.S. Army Corps of Engineers is currently conducting a study to determine clean-up requirements from former military training activity that occurred on this site. Depending upon the findings, USACE may be required to clear the trees to remediate the site. See Section 5.1.6 for more details.

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Exhibit 5-1 – Potential Habitat Impacts



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5.1.3 Climate

Although there are no Federal standards for aviation-related greenhouse gas (GHG) emissions, it is well established that GHG emissions can affect climate. The CEQ has indicated that climate should be considered in NEPA analyses.

Proposed Action

The following provides an estimate of GHG emissions. This report used the carbon dioxide equivalent (CO₂E) method to show relative impacts on climate change from different chemical species. The resulting CO₂E is provided for information only because no Federal NEPA standard for the significance of GHG emissions from individual projects on the environment has been established. **Table 5-2, Total Annual GHG Emissions**, provides the CO₂E emissions inventory for the construction and operational activities for the Proposed Action.

Table 5-2 – Total Annual GHG Emissions

METRICS	ANNUAL METRIC TONS (PEAK YEAR)		
	CO ₂	CH ₄	N ₂ O
Maximum Annual Emissions	7,864	0.1	0.0
GWP ₁₀₀	1.0	28.0	265.0
CO _{2e}	7,864	3.8	0.0
CO _{2e} Net Annual Emissions	7,868		

Notes: 1. CO₂ = Carbon Dioxide, CO₂E = Carbon Dioxide equivalent, CH₄ = Methane, N₂O = Nitrous oxide, GWP = Global Warming Potential.

2. Total emissions may not sum exactly due to rounding.

Source: Landrum & Brown analysis, 2020.

No Action

The No Action alternative does not involve any construction activities and therefore would not cause any impacts to climate from construction activity. Under the No Action alternative there would be no development and no change in GHG emissions would occur. Therefore, the No Action alternative would not cause additional operational impacts to climate.

5.1.4 Department of Transportation Act Section 4(f) Resources

The Federal statute that governs impacts in this category is commonly known as the Department of Transportation (DOT) Act of 1966, Section 4(f) provisions. Section 4(f) of the DOT Act was recodified and renumbered as Section 303(c) of U.S. Code Title 49 (49 U.S.C.). FAA Orders 5050.4B and 1050.1F continue to refer to this statute as Section 4(f) to avoid confusion. Section 4(f) provides that the “Secretary of Transportation may approve a transportation program or project requiring the use of publicly-owned land of a park, recreational area, or wildlife and waterfowl refuge of national, state, or local significance or land of a historic site of national, state, or local significance as determined by the official having jurisdiction over those resources only if: there is no prudent and feasible alternative that would avoid using those resources, and the program or project includes all possible planning to minimize harm resulting from the use.”³³ Two types of impacts to a Section 4(f) resource, physical (direct) or constructive (indirect) use, can occur from a Proposed Action. A physical use would occur if the Proposed Action or alternative(s) would involve an actual physical taking of Section 4(f) property through purchase of land or a permanent easement, physical occupation of a portion or all of the property, or alteration of structures or facilities on the property. Constructive use occurs when the impacts of a project on a Section 4(f) property are so severe that the activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. The FAA may also make a de minimis impact determination with respect to a physical use of Section 4(f) property if, after taking into account any measures to minimize harm, the result is either:

- A determination that the project would not adversely affect the activities, features, or attributes qualifying a park, recreation area, or wildlife or waterfowl refuge for protection under Section 4(f); or
- A Section 106 finding of no adverse effect or no historic properties affected.

Section 6(f) of the Land and Water Conservation Act (LWCA) is also pertinent to Section 4(f) lands. Section 6(f) prohibits recreational facilities funded under the LWCA from being converted to non-recreational use unless approval is received from the director of the grantor agency.

Proposed Action

There are no public parks, recreation facilities, or wildlife or waterfowl refuges located within the site of the Proposed Action. As noted in Section 4.2.7 of this EA, there are no historic sites listed on or eligible for the National Register of Historic Places (NRHP) at the Proposed Action site. The Proposed Action site includes the site of the former privately-owned Landings at Rickenbacker Golf Course. The golf course was closed prior to the acquisition of the property by the CRAA in 2015. Therefore, construction and operation of the Proposed Action would have no direct impacts on any Section 4(f) resource.

The Proposed Action would not cause unforecasted growth in aircraft activity nor would it cause a change in fleet mix or a permanent change in runway use patterns. The Proposed Action would not cause a permanent increase in taxi time or airfield delay. Therefore, no indirect impacts from aircraft noise or operations would occur to any Section 4(f) Resource. The Proposed Action would cause an increase in truck traffic accessing the Proposed Action site, which has the potential to cause indirect effects to Section 4(f) resources. The Proposed Action also has the potential to impact the views of the site from the surrounding properties. However, there are no Section 4(f) resources within the vicinity of the Proposed Action site; therefore, there would be no constructive taking of a Section 4(f) resource.

³³ FAA Environmental Desk Reference for Airport Actions, Section 7.1(b), Section 4(f) Resources, October 2007.

No Action

Under the No Action alternative, there would be no development that would cause a direct (physical taking) or indirect (constructive taking) impact to a Section 4(f) resource.

5.1.5 Farmland

Proposed Action

The Farmland Protection Policy Act of 1981 (FPPA) was enacted to minimize the extent to which Federal programs contribute to the unnecessary and irreversible conversion of farmland to non-agricultural uses.

The Proposed Action would occur entirely on CRAA-owned property that is currently undeveloped. The Proposed Action site is in Franklin and Pickaway counties and includes 330 acres of land, of which approximately 155 acres is being leased to local farmers for agricultural uses. The land that is being used for agriculture is used for corn, wheat, and soybean crops.

A coordination letter and preliminary Farmland and Conversion Impact Rating Form (AD-1006) were sent to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) on August 13, 2020. A response was received from the NRCS on August 28, 2020. **Appendix A, Agency Coordination** contains the original coordination letter and USDA response. The USDA provided updated AD-1006 forms for both Franklin and Pickaway counties. Within the Proposed Action site there are 0.2 acres of prime and unique farmland in the Franklin County portion of the site, and 177.5 acres of prime and unique farmland in the Pickaway County portion of the site based on soil type and other land features. Form AD-1006 assigns a number of points for each site according to the site characteristics relative to the conduciveness to farming. For any proposed project site in which the total points equals or exceeds 160, alternative actions should be considered that could reduce adverse impacts. Because the Proposed Action site crosses the county line, the USDA required the preparation of a separate Form AD-1006 for each county. The total score for each county was below 160; therefore, no further analysis was necessary and no significant impacts to farmland would occur due to the Proposed Action. There is additional airport-owned land around the Proposed Action site that the CRAA would still make available by lease for farming. The conversion of the Proposed Action site would not block access to the surrounding areas and would allow the acreage surrounding the Proposed Action site to still be available for farming. The rating process for Form AD-1006 is found in **Appendix F, Farmland**.

No Action

Under the No Action alternative, there would be no development and no impacts to farmland would occur.

5.1.6 Hazardous Materials and Solid Waste

The potential impacts resulting from hazardous materials and solid waste collection due to Federal projects are assessed under four primary laws that govern the handling and disposal of hazardous materials, chemicals, substances, and wastes:

- Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), (as amended by the Superfund Amendments and Reauthorization Act of 1986 and the Community Environmental Response Facilitation Act of 1992); ³⁴
- Pollution Prevention Act of 1990;³⁵

³⁴ 42 U.S.C. 9601-9675.

³⁵ 42 U.S.C. 1310-1319.

- Toxic Substances Control Act of 1976, as amended (TSCA);³⁶ and
- Resource Conservation and Recovery Act of 1976 (RCRA), (as amended by the Superfund Amendments and Reauthorization Act of 1986 and the Community Environmental Response Facilitation Act of 1992).³⁷

The two statutes that are most applicable to FAA actions to construct and operate airport facilities and other development are RCRA and CERCLA. RCRA governs the generation, treatment, storage, and disposal of hazardous wastes. CERCLA provides for consultation with natural resources trustees and clean up of any release of a hazardous substance (excluding petroleum) into the environment. The USEPA maintains the Superfund Enterprise Management System (SEMS) database of hazardous waste sites listed under CERCLA and RCRA regulations. Sites of highest concern are listed on the National Priorities List (NPL).

According to the FAA's Order 1050.1F Desk Reference, a significant impact would occur if an action would have the potential to:

- Violate applicable Federal, state, tribal, or local laws or regulations regarding hazardous materials and/or solid waste management;
- Involve a contaminated site (including, but not limited to, a site listed on the NPL) that is not properly mitigated. If appropriately mitigated, actions within the boundaries of a contaminated site would not have significant impacts;
- Produce an appreciably different quantity or type of hazardous waste;
- Generate an appreciably different quantity or type of solid waste or use a different method of collection or disposal and/or would exceed local capacity; or
- Adversely affect human health and the environment.

Proposed Action

The former Lockbourne Army Air Base is listed in the SEMS with several sites under investigation. As noted in Chapter 4, Section 4.2.6, a Feasibility Study Report and Remedial Investigation Report were prepared in June 2020 to identify remedial activities at two munitions response sites (MRSs) within the Proposed Action site: an Air Force Explosive Ordnance Disposal (EOD) Area and a 200-Yard Rifle Range. Both sites were identified as having potential risk from explosive ordnance material and further action was recommended. Other former military training areas (Prime B.E.E.F. area) and the rifle range safety fan area were also investigated. The level of other contaminants was tested, and that study determined that adverse health effects from human and ecological exposure to chemical munitions constituents in the soil are not expected. It is expected that the two MRSs and training and safety areas will be remediated by the USACE in accordance with applicable laws and regulations and to prevent any risk to human health or the environment. Therefore, the site contamination will be mitigated to prevent significant impacts.

The use of fuel necessary for commercial trucking operations would increase due to the use of trucks at the proposed distribution warehouses. Fuel usage would also increase temporarily during construction to power construction vehicles. The storage, use, transportation, and disposal of hazardous materials and other regulated substances is governed by Federal, state, and local regulations. These regulations, combined with existing technologies and work practices developed to properly manage these substances, substantially reduce the risks of causing environmental contamination from the construction and operation of the Proposed Action. It is not known if any user of the proposed facilities would generate or ship hazardous waste; however, if such materials

³⁶ 15 U.S.C. 2601-2692

³⁷ 42 U.S.C. 6901-6992(k)

were used or transported at the Proposed Action site, all applicable State and Federal regulations would be followed to prevent hazardous conditions.

It is anticipated that additional solid waste would be generated during construction and operation of the proposed facilities. It is expected that the amount of solid waste generated by the Proposed Action would not exceed local waste hauling or disposal capacity. Pollution prevention methods, such as minimization and recycling, would be implemented to the extent practical during construction and operation to reduce solid waste streams.

The Proposed Action would not be expected to generate unmanageable hazardous waste or an unmanageable amount of solid waste nor is it expected to adversely affect human health. Remediation of the site would continue under the authority of the U.S. Army Corps of Engineers prior to construction on any site that is at potential risk from explosive ordnance material. The CRAA is coordinating with the USACE to confirm that remediation is conducted to meet appropriate standards for future construction and use of the Proposed Action site. Therefore, the Proposed Action is not expected to result in significant impacts from hazardous materials or solid waste.

No Action

Under the No Action alternative, there would be no development that would impact any sites containing hazardous materials and no additional solid waste would be generated. Remediation of the site would continue under the authority of the U.S. Army Corps of Engineers. Therefore, no impacts would occur.

5.1.7 Historical, Architectural, Archaeological, and Cultural Resources

The *National Historic Preservation Act of 1966* (NHPA)³⁸ and the *Archeological and Historic Preservation Act of 1974*³⁹ are the primary Federal laws governing the preservation of historic and prehistoric resources, encompassing art, architecture, archaeological, and other cultural resources. Section 106 of the NHPA requires that, prior to approval of a Federal or Federally-assisted project, or before the issuance of a license, permit, or other similar approval, Federal agencies take into account the effect of the project on properties that are on or eligible for listing on the NRHP.

Proposed Action

Several archaeological field surveys were conducted of the Proposed Action site in compliance with Section 106 of the NHPA and are discussed in Section 4.2.7, *Historical, Architectural, Archaeological, and Cultural Resources*. The purpose of the surveys was to identify any historic properties located within the Area of Potential Effect (APE) that are listed or eligible for listing on the NRHP. No resources that are eligible for listing on the NRHP have been identified within the APE. Therefore, there would be no impact to historical, architectural, archaeological, or cultural resources as a result of the Proposed Action. The Ohio State Historic Preservation Office (SHPO) provided their concurrence with this determination in a letter dated October 26, 2020. A copy of this letter is included in Appendix C.

No Action

Under the No Action alternative, there would be no development and no impacts to historic resources would occur.

³⁸ Public Law 89-665; 16 U.S.C. 470 et seq.

³⁹ Public Law 86-523, 16 U.S.C. 469-469c-2,

5.1.8 Land Use

The FAA has not established a significance threshold for land use impacts other than those related to noise impacts. However, CEQ Regulations require that NEPA documents discuss any inconsistency with approved state and/or local plan(s) and law(s). Furthermore, the NEPA document should discuss potential hazards to aviation such as landfills, wildlife refuges, or wetland mitigation that may attract wildlife species hazardous to aviation and potential structure height impacts.

Proposed Action

The Proposed Action would occur entirely on CRAA-owned property. The site is surrounded by commercial and aviation land uses to the north and west and a former golf course to the south, as shown in Exhibit 4-5, *Existing Land Use*. The Proposed Action is part of the larger Rickenbacker Global Logistics Park (RGLP), which is a public/private partnership comprised of the CRAA, Capitol Square, Ltd., and Duke Realty Corporation. Immediately west of the Project Site are existing commercial bulk cargo distribution warehouse buildings, similar to the Proposed Action, that are part of the RGLP.

The Proposed Action site is on the border of Franklin and Pickaway Counties. The northern part of the Proposed Action site is zoned Industrial in Madison Township in Franklin County.⁴⁰ The southern part of the Proposed Action site is located within Madison Township in Pickaway County in an area zoned as RBD-Rickenbacker Business District.⁴¹ Current zoning regulations in these zoning districts allow for large commercial warehouses. Therefore, the Project Site is zoned appropriately for the Proposed Action and would not be inconsistent with local land use plans or strategies.

Development would be constructed in accordance with FAA requirements on height limitations and potential wildlife attractants.

No Action

Under the No Action alternative, there would be no development and no changes to existing land use patterns would occur.

5.1.9 Natural Resources and Energy Supply

This section presents the analysis of potential impacts to natural resources and energy supplies as a result of the No Action and the Proposed Action. The supply of natural resources may be impacted by a construction project because the use of dirt, rock, or gravel could diminish or deplete the supply of those and other natural resources.

Sections 1502.16(e) and (f) of the CEQ Regulations require that Federal agencies consider energy requirements, natural resource requirements, and potential conservation measures for a Proposed Action and its alternatives.

Proposed Action

The Proposed Action would include the construction of new bulk distribution warehouse facilities. Operation of these proposed facilities would require the use of electricity to power and light the buildings and to light the parking areas. Natural gas would be needed to provide heating for the proposed facilities.

⁴⁰ Franklin County Zoning Resolution. Amended and readopted August 13, 2019. Accessed on May 5, 2020, available online at: https://development.franklincountyohio.gov/EDP-website/media/Documents/Planning_Zoning/Zoning/Zoning-Resolution-Updated-08-13-19.pdf.

⁴¹ Madison Township Zoning Resolution, *Zoning Districts*. Amended and readopted October 2016. Accessed on May 5, 2020, available online at: <http://www.madisonpickaway.org/docs/resolutions/madison-township-part-three-zoning-districts.pdf>.

Local utility companies, South Central Power Company and Columbia Gas of Ohio, were contacted regarding the proposed development. Both utilities indicated that they have sufficient infrastructure in place which would require minimal upgrades to accommodate the increase in consumption of electricity and natural gas from the Proposed Action. Water, sanitary sewer, natural gas, and telecommunications lines are already in place on Rickenbacker Parkway, terminating just west of the Proposed Action site. These existing lines would be extended further east within the existing right-of-way along Rickenbacker Parkway to the Cargo Campus. Electric power lines may be upgraded along Rickenbacker Parkway. In addition, representatives of South Central Power Company indicated that the existing Midway Substation may require upgrades to enable sufficient power supply to the Proposed Action site. These upgrades would occur within the existing substation footprint and would not significantly impact any environmental resources.

All buildings are expected to be LEED certified. As part of LEED requirements, construction and demolition materials are recycled where possible. Energy-efficient designs and operational features would be incorporated into the buildings to the extent practical.

No change in the number of aircraft operations would occur as a result of the Proposed Action; however, there would be an increase in trucks and vehicle traffic accessing the Proposed Action site. Due to availability of fuel in the region, any increase in demand is expected to be minimal and would not exceed the existing supplies. Construction of the Proposed Action would require natural resources such as steel, gravel, sand, aggregate, concrete, asphalt, water, and other construction materials. These materials are not in short supply in the Columbus region and consumption of these materials is not expected to deplete or cause a shortage of existing supplies. Therefore, construction and operation of the Proposed Action would not significantly impact natural resources or energy supply.

No Action

Under the No Action alternative, there would be no development or use of natural resources or energy for construction.

5.1.10 Noise and Noise-Compatible Land Use

Proposed Action

The Proposed Action would not cause unforecasted growth in aircraft activity nor would it cause a change in fleet mix or a permanent change in runway use patterns, taxi time, or airfield delay. Therefore, no impacts from aircraft noise would occur. Noise levels during construction of the Proposed Action would be limited to construction time periods. Typical construction equipment, including dump trucks, bulldozers, front loaders, pavers, and backhoes would be used at the site. It is expected that construction would occur during the daytime and haul routes would be established to avoid residential areas. During operation, noise from trucks accessing the Proposed Action site may be audible.

It is anticipated that the noise from truck activity would be similar to noise from trucks that currently operate at the existing distribution warehouses to the west of the Proposed Action site. Therefore, no significant noise impacts would occur.

No Action

Under the No Action alternative, there would be no construction or change in noise levels.

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

The FAA has not established a significance threshold for socioeconomics; however, in general, the significance of socioeconomic impacts is determined by the magnitude and duration of the impacts, whether beneficial or adverse. According to FAA Order 1050.1F, potential impacts to consider include:

- inducing substantial economic growth,
- dividing or disrupting an established community,
- extensive relocation of housing when sufficient replacement housing is unavailable,
- extensive relocation of businesses that would cause economic hardship,
- disruption of local traffic patterns, or
- substantial loss of the community tax base.

Proposed Action

5.1.11.1 Socioeconomics

The Proposed Action would not cause the relocation of existing residences. No off-airport businesses would be displaced by the Proposed Action. The Proposed Action would not cause the demand for public services to exceed local capacity nor would it cause a decrease in the local tax base.

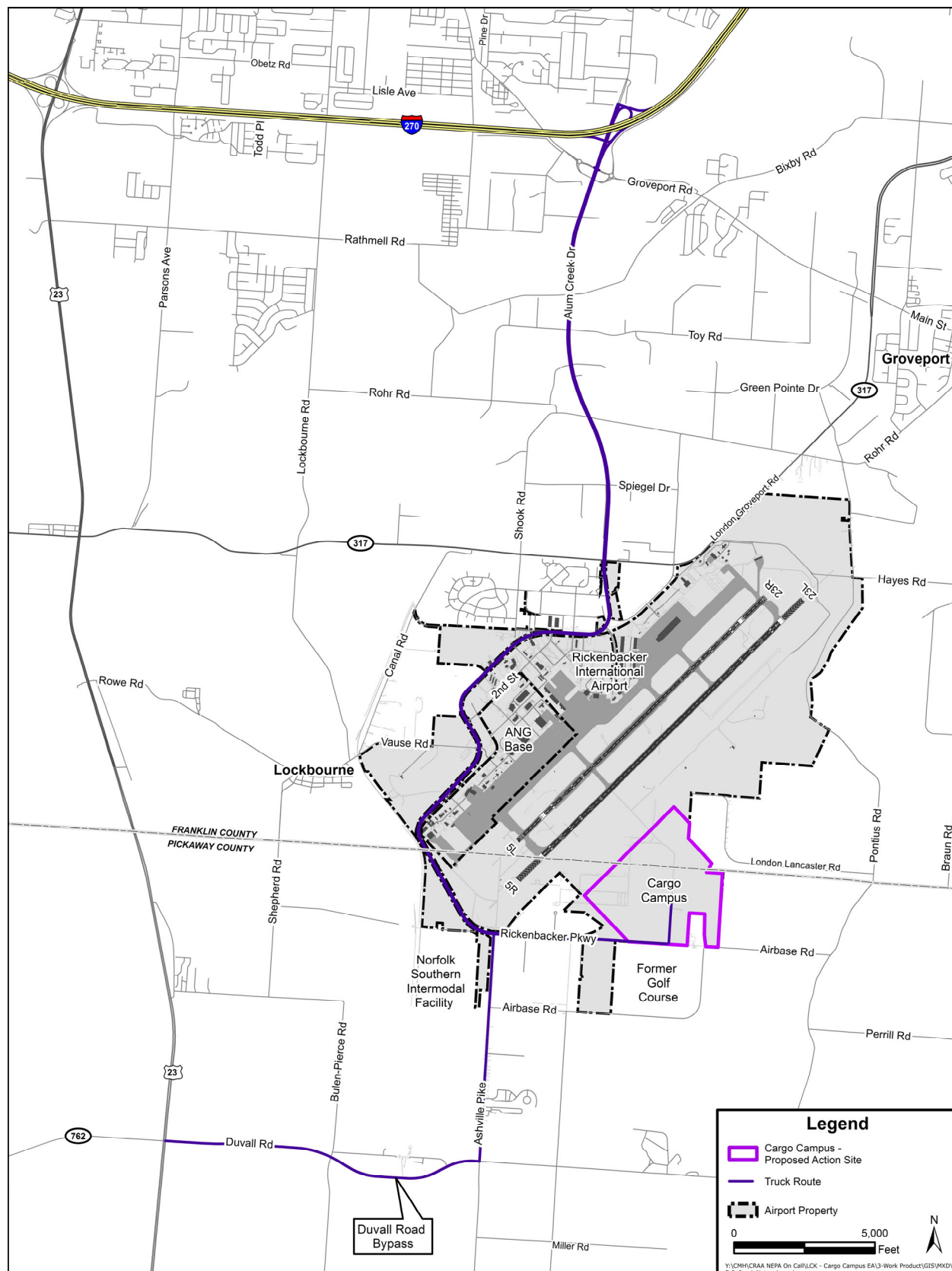
5.1.11.2 Surface Vehicle Traffic

Surface vehicle traffic access at the RGLP is primarily provided by Interstate 270 and Alum Creek Drive or U.S. 23 as shown on **Exhibit 5-2, Truck Routes**. It is anticipated that truck traffic would follow the primary route along Rickenbacker Parkway and Alum Creek Drive to travel to and from the Cargo Campus and I-270. A secondary route along Ashville Pike and Duvall Road (State Route 762) has been identified between the Cargo Campus site and U.S. 23. In 2015, the Duvall Road bypass was constructed to alleviate congestion on local roadways in this area.

The construction of the Proposed Action would result in a temporary increase in surface traffic due to construction vehicles. Operation of the Proposed Action would result in a permanent increase in surface vehicle traffic from trucks hauling materials to and from the site and employee vehicles. It is expected that full buildout would occur by 2030. A traffic count and trip generation analysis was conducted for the Proposed Action, which estimated that approximately 6,914 additional round trips would occur on Rickenbacker Parkway between Ashville Pike and the Cargo Campus facilities by 2030. These trips include truck traffic hauling cargo to and from the proposed bulk distribution warehouses, as well as employee vehicles.

Average daily traffic levels for the 2030 No Action condition were estimated based on the most recent traffic counts conducted along each route and application of an average growth rate of 2.4% based on historical count records for the area in the ODOT traffic survey reports. For 2030 Proposed Action, the estimated traffic levels from the trip generation analysis for the Cargo Campus were added to the estimated 2030 No Action traffic levels. For this analysis, it was estimated that approximately 75 percent of traffic from the Proposed Action would operate on the route between the Cargo Campus and I-270 via Alum Creek Drive and 25 percent would operate on the route from the Cargo Campus to U.S. 23 via Duvall Road. The estimated average daily traffic (ADT) volumes for the various segments of the main truck transport routes for the 2030 No Action and 2030 Proposed Action conditions are provided in **Table 5-3, Roadway Segment Traffic Counts and Level of Service**.

Exhibit 5-2 – Truck Routes



It is expected that access to the Intermodal Facility could reduce the need for some truck traffic as some users may ship goods via rail. However, shipping methods would be at the discretion of end users and are unknown at this time. Therefore, the trip generation analysis was based on average trips per building size without any potential reduction in trips or distance traveled due to the proximity to the Intermodal Facility.

A level of service analysis (LOS) was conducted for the roadway segments and select intersections on the routes shown in Exhibit 5-2. This LOS analysis compared the traffic levels and capacity of the 2030 No Action and 2030 Proposed Action conditions. The estimated ADT volumes were compared with LOS definitions in accordance with the Mid-Ohio Regional Planning Commission (MORPC) to assign an LOS grade for each roadway. Under the 2030 No Action conditions, all roadways would be expected to operate at LOS C or better, with the exception of US 23 which would operate at LOS D and Alum Creek Drive between I-270 and Rohr Road which would operate at LOS E. Under the 2030 Proposed Action conditions, the LOS would be expected to remain the same for all roadway segments. Therefore, LOS would not be downgraded to below acceptable levels on these roadway segments under the Proposed Action.

Table 5-3 – Roadway Segment Traffic Counts and Level of Service

Segment	2030 No Action		2030 Proposed Action	
	ADT	LOS	ADT	LOS
Alum Creek Drive between I-270 and Rohr Road	44,205	E	49,391	E
Alum Creek Drive between Rohr Road and London-Groveport Road (State Route 317)	11,408	C	16,594	C
Alum Creek Drive / Rickenbacker Parkway between London-Groveport Road (State Route 317) and Vause Road	11,432	C	16,618	C
Rickenbacker Parkway between Vause Road and Ashville Pike (State Route 762)	7,175	C	12,361	C
Rickenbacker Parkway between Ashville Pike (State Route 762) and Cargo Campus	1,074	C	7,988	C
Duvall Road (State Route 762) from US-23 to Ashville Pike (State Route 762)	6,236	C	7,965	C
U.S. 23 at Duvall Road (State Route 762)	39,691	D	41,420	D

Source: TranSystems, 2020.

An LOS analysis was conducted at intersections along the routes shown in Exhibit 5-2 to determine potential effects of peak traffic. For this intersection analysis, peak hour traffic levels were estimated for morning (AM peak) and afternoon (PM peak) conditions. The analysis showed some downgrade in LOS at the intersection of Rickenbacker Parkway and Ashville Pike (State Route 762) from LOS B to LOS C in the AM peak and from LOS A to LOS B in the PM peak. The intersection of Ashville Pike and Duvall Road (State Route 762) would experience a downgrade from LOS B to LOS C in the AM peak, but only minor degradation in the PM peak. In accordance with ODOT guidelines, LOS D is acceptable within the Metropolitan Planning Organization (MPO) which includes all of Franklin County, and LOS C is acceptable within a Rural Planning Organization (RPO) which includes all of Pickaway County.⁴² The intersection of US 23 and Duvall Road (State Route 762) was shown to operate at LOS E in the AM peak and LOS F in the PM peak in the 2030 No Action condition. In the 2030

⁴² Ohio Department of Transportation, Analysis and Traffic Simulation Manual, January 2021.

Proposed Action condition, the AM peak would be degraded to LOS F with an increase in delay of approximately 27 seconds. While this intersection would potentially experience a downgrade in LOS under the Proposed Action, it would be expected to operate at an unsatisfactory LOS in the 2030 No Action scenario. Therefore, LOS would not be downgraded to below acceptable levels on these intersections as a result of the Proposed Action.

In 2018, the Mid-Ohio Regional Planning Commission (MORPC) prepared the Rickenbacker Study Area Report with recommendations to improve overall conditions within the study area and accommodate projected future growth in commercial development.⁴³ That report included several recommendations to improve transportation within the area surrounding the RGLP and the Airport. Roadway recommendations were grouped into tiers based on priority. The following lists the recommendations along the truck hauling routes:

- Tier 1 (highest-priority projects)
 - Widening Alum Creek Drive between Groveport Road and State Route 317
 - Improving the intersection of Alum Creek Drive and Groveport Road
 - Constructing a new interchange at State Route 762 and U.S. 23
- Tier 2 (second-highest priority projects)
 - Widening Ashville Pike south of Rickenbacker Parkway and
 - Widening Duvall Road between Ashville Pike and U.S. 23

Implementation of these roadway improvements would be expected to improve traffic conditions and reduce any impacts of additional vehicle trips to and from the proposed Cargo Campus development. Funding sources and implementing schedules are not published, rather these projects are expected to be implemented as needed.

The Proposed Action would not cause a decrease in the level of service of roadways or intersections to below acceptable levels. Therefore, no significant traffic impacts would occur.

No Action

Under the No Action alternative, there would be no development or changes that would cause changes to socioeconomic conditions, including changes in traffic patterns or relocation of residences or businesses. Roadway conditions would be expected to continue to operate with the levels of service described in Table 5-3 for the 2030 No Action condition without the implementation of other independent traffic improvements.

5.1.11.3 *Environmental Justice*

Executive Order 12898 directs Federal agencies to incorporate environmental justice into their planning processes by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations. A specific significance threshold for environmental justice has not been established by the FAA. However, potential impacts would occur if disproportionately high environmental impacts in one or more environmental categories were to occur to minority or low-income populations. In addition, unique impacts to a minority or low-income population should also be considered even if there is no significant impact from other environmental categories.

⁴³ Mid-Ohio Regional Planning Commission, The 2018 Rickenbacker Study Area, Available online at <https://www.morpc.org/program-service/rickenbacker-area-study/>. Accessed 1/11/2021.

Table 5-4, *Environmental Justice Populations*, depicts the percent of minority residents and the percent of residents below the poverty level within the Study Area compared to the overall Columbus MSA.⁴⁴ As shown, the Study Area, which includes the U.S. Census Block Groups adjacent to the Cargo Campus, has a lower percentage of minority residents than the overall Columbus MSA. However, the Study Area has a higher percentage of low-income residents below the poverty level than compared to the Columbus MSA. Therefore, the Study Area does include an environmental justice population.

Table 5-4 – Environmental Justice Populations

	Study Area	Columbus Metropolitan Statistical Area (MSA)
Percent Minority	17.8%	26.6%
Percent Below Poverty Level	18.6%	13.7%

Note: Study Area includes Franklin County Block Groups 212005 and 211001, and Pickaway County Block Group 103001. The Columbus MSA includes Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union counties.

Source: U.S. Census Bureau, American Community Survey, Five Year Estimates, 2013-2018.

Proposed Action

No significant environmental impacts would occur as a result of the Proposed Action. Therefore, no significant impacts would be disproportionately borne by minority or low-income populations. Furthermore, no unique circumstances have been identified that would cause disproportionate impacts to minority or low-income populations. Therefore, no significant environmental justice impacts would occur as a result of the Proposed Action. This EA included notification and opportunity for public comment as described in Appendix G.

No Action

Under the No Action alternative, there would be no development or changes that would cause impacts to minority or low-income populations.

5.1.11.4 *Children's Environmental Health and Safety Risks*

Executive Order 13045 directs Federal agencies to analyze their policies, programs, activities, and standards for any environmental health or safety risks that may disproportionately affect children. The FAA has not established a significance threshold for Children's Environmental Health and Safety Risks. However, according to FAA Order 1050.1F, potential impacts from other environmental categories should be assessed to determine if they have the potential to lead to a disproportionate health or safety risk to children.

Proposed Action

The Proposed Action would not cause disproportionate impacts to children. No other significant impacts have been identified that would cause a unique or disproportionate impact to children. The construction sites would be fenced off to prevent access to the site. Haul routes would avoid routing equipment near parks, schools or daycare facilities. Therefore, no significant impacts to children's health or safety would occur as a result of the Proposed Action.

⁴⁴ The Columbus MSA includes Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union counties. The Study Area for this analysis includes Franklin County Block Groups 212005 and 211001, and Pickaway County Block Group 103001, which are the three block groups adjacent to the Cargo Campus and include the areas along the proposed truck hauling routes.

No Action

Under the No Action alternative, there would be no development or changes that would cause impacts to children's environmental health and safety.

5.1.12 Visual Effects

This section presents the analysis of potential visual effects, including impacts related to light emissions and visual resources and visual character, as a result of the No Action Alternative and the Proposed Action.

Visual effects include the extent to which an action would produce light emissions that create annoyance or interfere with activities; or that contrast with, or detract from, the visual resources and/or the visual character of the existing environment.

Per FAA Order 1050.1F, light emission impacts are typically related to the extent to which any lighting or glare associated with the proposed action or alternative(s) would create an annoyance for people in the vicinity, would interfere with their normal activities including work and recreation, or would contrast with, or detract from, the visual resources and/or the visual character of the existing environment. Visual resources include buildings, sites, traditional cultural properties, and other natural or manmade landscape features that are visually important or have unique characteristics. Visual character refers to the overall aesthetics of the existing landscape.

There are no Federal special purpose laws or requirements specific to light emissions and visual effects; although, other special purpose laws, such as the NHPA and Section 4(f) of the DOT Act have specific provisions for visual impacts to protected resources. In order to determine the potential visual effects, the Proposed Action conditions are compared to the No Action conditions to determine if there is a potential for annoyance and adverse impacts.

5.1.12.1 *Light Emissions*

Proposed Action

The Proposed Action would include development that would increase light emissions from the illumination of the proposed new buildings and parking areas. The closest residence to the Proposed Action site is located on Airbase Road approximately 800 feet east from the nearest proposed building. The potential lighting sources that could impact the closest residential area would be located in the parking lots and security lighting on the buildings. The parking lot lights would be directed at a downward angle to minimize any impact to the residences. The security lighting would illuminate the immediate area surrounding the building and would also be shielded or directed at angles that would minimize impacts to the residences. Light emissions during the construction of the Proposed Action are not anticipated to cause any impact to the surrounding areas as most of the construction would occur during daytime hours. Therefore, no significant impacts from light emissions are anticipated to occur.

No Action

Under the No Action alternative, there would be no development or changes that would cause light emission impacts.

5.1.12.2 *Visual Resources and Visual Character*

Proposed Action

The Proposed Action site is located on the south-eastern edge of Airport property and is adjacent to commercial development to the west. The Proposed Action would expand the commercial areas and match the visual character of the existing commercial development. The closest residential building to the Proposed Action site is

on Airbase Road approximately 800 feet east from the nearest proposed building. **Exhibit 5-3, View of Intermodal Campus North from Rickenbacker Parkway, 800 feet west of building**, shows the view of the Intermodal Campus North from 800 feet west on Rickenbacker Parkway East. Construction of the Proposed Action would expand development to the east and would result in views for residential areas to the east of the Cargo Campus that are similar to the view shown in Exhibit 5-3. Trees on the southeast corner of the Proposed Action site would be avoided during construction to provide a visual buffer between residences east of the Proposed Action site on Airbase Road. Additional residential areas are located to the northeast of the Proposed Action site on London-Lancaster Road approximately 1,000 or more feet from the proposed buildings.

It is the intent that the ten-acre wooded area would be avoided by construction which would partially block the views of the proposed Cargo Campus development from the residences on London-Lancaster Road.⁴⁵ Visual impacts are subjective; however, the visual impact of the Proposed Action on the residential property on Airbase Road is not necessarily significant.

Exhibit 5-3 – View of Intermodal Campus North from Rickenbacker Parkway, 800 feet west of building



Source: Google Earth, 2020.

No Action

Under the No Action alternative, there would be no development or changes that would cause visual impacts.

⁴⁵ The CRAA and developer intend to avoid this wooded area. The U.S. Army Corps of Engineers is currently conducting a study to determine clean-up requirements from former military training activity that occurred on this site. Depending upon the findings, USACE may be required to clear the trees to remediate the site.

5.1.13 Water Resources

5.1.13.1 Wetlands

Proposed Action

A wetland delineation field survey of the Proposed Action site completed in 2015, and updated in 2019, found there are seven streams and 11 wetlands in the Proposed Action site, as listed in Table 4-2 and Table 4-3 and shown on Exhibit 4-6, Wetlands and Streams. The Proposed Action would directly impact approximately 4,900 linear feet of streams and 4.3 acres of wetlands as shown on **Exhibit 5-4** and listed in **Table 5-5, Streams and Wetland Impacts**. These features would be cleared and filled to accommodate the Proposed Action. Best management practices (BMPs) would be employed during construction to minimize indirect impacts to wetlands and streams from runoff, sedimentation, and changes in hydrology.

A water of the United States is considered a jurisdictional surface water or wetland under the Clean Water Act (CWA). Section 404 of the CWA authorizes the USACE to issue permits for the discharge of dredged or fill material into the waters of the United States. Section 401 of the CWA requires coordination with the OEPA to ensure the Proposed Action does not violate State water quality standards.

A coordination letter was sent to the USACE Huntington District's Regulatory Division on August 13, 2020 and a response was received on September 3, 2020. The response from the USACE noted that based upon a review of the information provided, the Proposed Action site contains streams and wetlands, which may be waters of the United States (jurisdictional waters) in accordance with the Regulatory Guidance Letter for Jurisdictional Determinations issued by the USACE on October 31, 2016. Further coordination was conducted with the USACE to address potential changes in jurisdictional status of streams and wetlands as a result of the Navigable Waters Protection Rule (NWPR) which became effective on June 22, 2020. The NWPR revises previous guidance by which USACE determines the jurisdictional status of streams and wetlands. Under the NWPR, ephemeral streams and wetlands adjacent to ephemeral streams are not considered waters of the United States. **Appendix D** contains the documentation of the coordination conducted with the USACE.

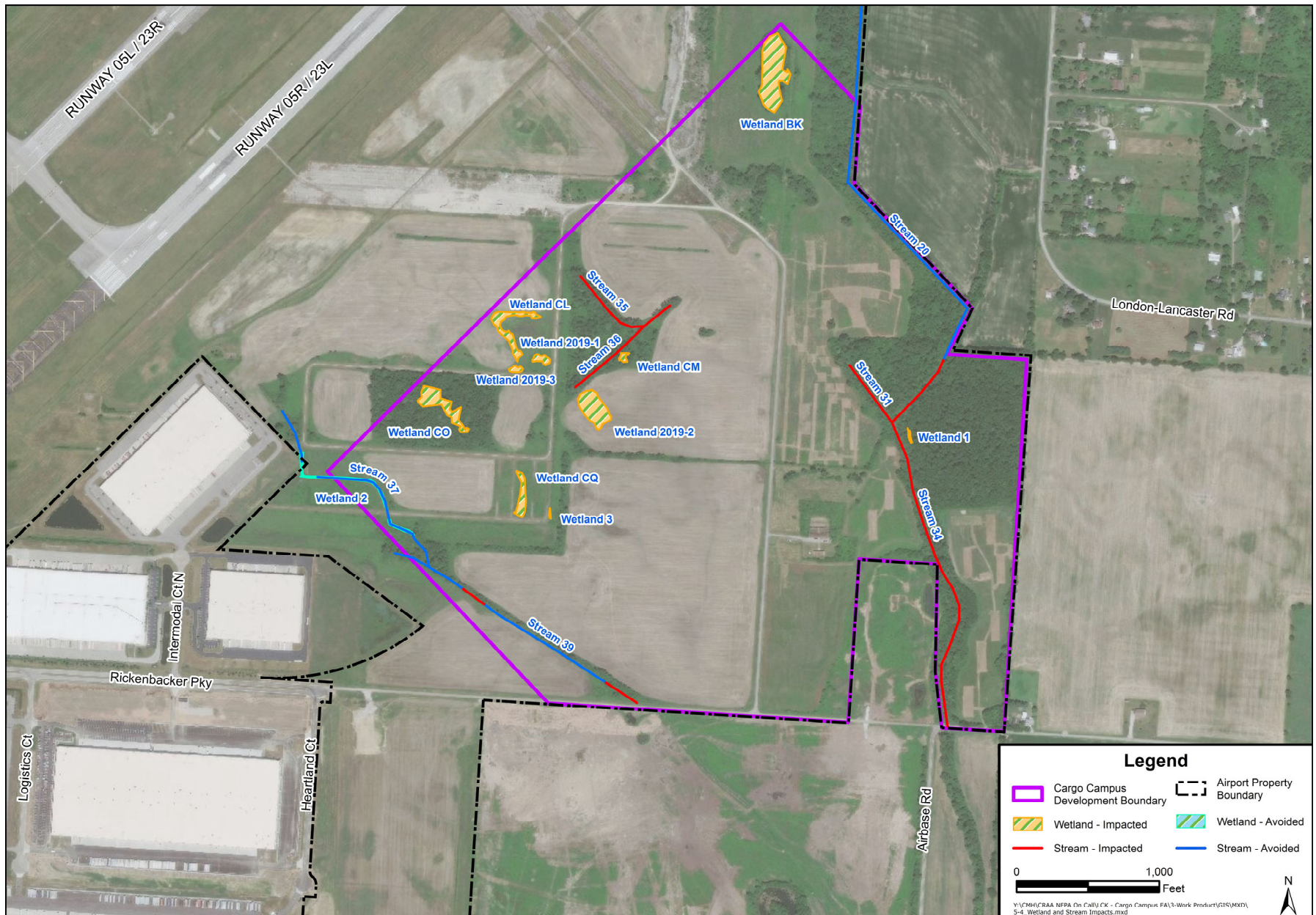
Under Ohio Revised Codes (ORC) Section 6111, OEPA has the authority to regulate non-jurisdictional (isolated) wetlands (waters of the State). Since publication of the NWPR, this authority has been extended to include ephemeral streams that are no longer considered waters of the United States.

The Proposed Action site contains both waters of the United States and isolated wetlands and ephemeral streams under the jurisdiction of OEPA. Therefore, the Proposed Action would require authorization under Sections 401 and 404 of the Clean Water Act and isolated wetland and ephemeral stream permits under ORC 6111. Table 5-5 shows the jurisdictional status of the wetlands and streams that would be impacted. Coordination with the USACE and OEPA Division of Surface Water is ongoing to obtain the necessary permits for the proposed impacts to wetlands and streams. It is expected that the proposed impacts would require an individual permit per Section 404 of the Clean Water Act as well as a Section 401 Water Quality Certification and isolated wetland/ephemeral stream permit from OEPA. Mitigation for the loss of wetlands and streams would be implemented in accordance with the permit requirements to ensure no significant impacts to wetlands and streams would occur.⁴⁶

⁴⁶ The mitigation plan has not been finalized at this time. It is expected that mitigation would include purchasing credits at either the Big Darby Hellbranch, Little Scioto, and/or the Red Stone Farm mitigation banks; use of previously purchased mitigation credits; and payment to the Nature Conservancy or Stream+Wetland Foundation In Lieu-Fee Programs. Options to preserve existing aquatic features on CRAA-owned property are also under consideration.

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Exhibit 5-4 – Wetland and Stream Impacts



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Table 5-5 – Streams and Wetland Impacts

Map ID	Impacted Length (Linear Feet)	Impacted Area (acres)	Description	Jurisdictional Status
Streams				
Stream 20	565	0.16	Perennial Stream	Water of the U.S.
Stream 31	501	0.12	Perennial Stream	Water of the U.S.
Stream 34	2,267	0.85	Perennial Stream	Water of the U.S.
Stream 35	596	0.07	Ephemeral Stream	Water of the State of Ohio
Stream 36	774	0.07	Ephemeral Stream	Water of the State of Ohio
Stream 39	200	0.03	Intermittent Stream	Water of the U.S.
Wetlands				
Wetland 2019-1	n/a	0.07	PEM - Isolated	Water of the State of Ohio
Wetland 2019-2	n/a	0.51	PEM - Isolated	Water of the State of Ohio
Wetland 2019-3	n/a	0.04	PEM - Isolated	Water of the State of Ohio
Wetland 1 – NEW	n/a	0.03	PFO/PSS - Connected	Water of the U.S.
Wetland 3 – NEW	n/a	0.03	PEM - Isolated	Water of the State of Ohio
Wetland BK	n/a	1.70	PFO - Connected	Water of the U.S.
Wetland CL	n/a	0.59	PEM - Isolated	Water of the State of Ohio
Wetland CM	n/a	0.09	PFO/PSS - Isolated	Water of the State of Ohio
Wetland CO	n/a	0.72	PFO - Isolated	Water of the State of Ohio
Wetland CQ	n/a	0.52	PEM - Isolated	Water of the State of Ohio

Note: Wetland type based on Cowardin Classification system, PEM = Palustrine emergent, PFO = Palustrine forested, PSS = Palustrine scrub-shrub.

Source: TranSystems, 2020.

No Action

Under the No Action alternative, there would be no development or changes that would cause impacts to wetlands or streams.

5.1.13.2 Floodplains

Proposed Action

The Proposed Action site is not located within a designated floodplain, as shown on Exhibit 4-7, *Floodplain Map*. A review of the FEMA FIRMs indicates that all land within the Proposed Action site is located outside of a designated 100-year floodplain. Therefore, there would be no impacts to floodplains from construction or operation of the Proposed Action.

No Action

Under the No Action alternative, there would be no development or changes that would cause impacts to floodplains.

5.1.13.3 Surface Waters

Proposed Action

The Proposed Action would increase the amount of impervious surface area, which would generate additional stormwater runoff. The Proposed Action includes construction of stormwater detention facilities to collect and treat stormwater runoff. The developer would coordinate with the OEPA Division of Surface Water regarding the design and construction of stormwater detention facilities and obtaining a National Pollution Discharge Elimination System (NPDES) permit, as required in accordance with Section 402 of the Clean Water Act. Construction of the stormwater detention basins would also follow all guidelines listed in FAA Advisory Circular 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports*,⁴⁷ to ensure the stormwater detention facilities would not cause a wildlife hazard.

No Action

Under the No Action alternative, there would be no development or changes that would cause impacts to surface water resources.

5.1.13.4 Groundwater

Proposed Action

There are no sole source aquifers as designated by the USEPA, nor are there any known drinking water protection areas designated by OEPA within the Proposed Action site. There are private wells in the vicinity of the Proposed Action Site; however, they would not be impacted by construction of the Proposed Action. Additionally, no activity that would generate or transport hazardous materials that could cause contamination to groundwater is expected as a result of the Proposed Action. Therefore, no significant impacts to groundwater resources would occur as a result of the Proposed Action.

No Action

Under the No Action alternative, there would be no development or changes that would cause impacts to groundwater resources.

⁴⁷ Federal Aviation Administration, *AC 150/5200-33C – Hazardous Wildlife Attractants on or near Airports*, February 21, 2020. Available online https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentnumber/150_5200-33.

5.2 Cumulative Impacts

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

Cumulative impacts must be evaluated relative to the direct and indirect effects of the Proposed Action for each environmental category discussed previously in this chapter. As with the environmental consequences discussion, the No Action alternative serves as the reference point against which potentially significant cumulative impacts are evaluated. Significant cumulative impacts are determined according to the same thresholds of significance used in the evaluation of each environmental category in the environmental consequences discussion.

There are several past, present, or reasonably foreseeable future projects in the vicinity of the RGLP that may combine to create cumulative impacts. These projects are described in the following sections.

Past Projects

Other Commercial Development

Several other development sites in the vicinity of LCK and the RGLP have undergone construction in the past five years.

Intermodal Campus South

The Intermodal Campus South is located south of LCK and directly east of the Norfolk Southern Intermodal Facility. The project included construction of three bulk distribution warehouses totaling approximately 2,600,000 square feet, and the necessary infrastructure and parking. The project also included construction of Rickenbacker Parkway from Alum Creek Drive, around the west and southwest side of LCK property, terminating approximately 3,000 feet east of Ashville Pike. The Intermodal Campus, known formerly as the South Industrial Park, was included as a secondary and cumulative impact of the Norfolk Southern Intermodal Facility and the Alum Creek Drive Extension project. These projects were reviewed in accordance with NEPA through completion of a categorical exclusion document titled Alum Creek Drive Extension (FRA/PIC-CR122; PID 79322) and the Rickenbacker Intermodal Facility for the Ohio DOT. The document was approved by the Federal Highway Administration and the FAA in a joint letter dated June 30, 2005. At the time, no known development plan existed for the Intermodal Campus and environmental commitments were made to coordinate impacts (specifically for wetlands and endangered species) with the resource agencies once such a plan had been developed.

A development plan for the Intermodal Campus has been developed by Duke Realty Corporation in cooperation with the CRAA. Coordination was conducted with the resource agencies and a written re-evaluation was submitted to the FAA in fulfillment of the environmental commitments made in the original environmental document. The written re-evaluation was approved on October 17, 2006. Wetland impacts were mitigated in accordance with OEPA regulations. Three commercial warehouse buildings were constructed on the site between 2015 and 2019. One developable building site remains available.

Intermodal Campus North

This project included development of approximately 105 acres of land situated near the southeast end of Runway 5R. The development was initially called the Square Tee development but is now known as Intermodal Campus North. Development included construction of three industrial warehouse structures, associated parking, and stormwater detention ponds. FAA approval was granted on October 12, 2006 for a 68-acre development. A written re-evaluation was submitted in 2008, while construction was under way, to add an additional 37-acre parcel to the development. FAA approval for the additional development was granted in 2009, and the project was completed in 2015.

Gateway Campus

The Gateway Campus is located north of LCK on the east side of Alum Creek Drive. The site contains approximately 157 acres. Two commercial warehouse facilities were constructed on the site in 2016 and 2017. Due to the location of the site, it was determined that it did not require FAA approval; therefore, no NEPA clearance under FAA guidelines was required. Approximately 52 acres of the campus remains undeveloped and available for new development.

Other Development

Other parcels of land not owned by the CRAA have been developed in the vicinity of LCK and the RGLP in the past five years, including properties south of the Intermodal Campus South, northwest of LCK on State Route 317, the Air East Business Park northeast of LCK south of Rohr Road, and other infill development along Alum Creek Drive.

LCK Airfield Improvements - Modification of Standards (MOS) Phase 1 Improvements

This project modified Taxiway A to accommodate Taxiway Design Group (TDG) 5 standards (75 feet wide with 30-foot shoulders in straight away sections and flared fillets). Intersecting taxiway (B, C, D, E, G) fillets were reconstructed, the taxiway pavement was rehabilitated, and concrete joint material was replaced. New taxiway LED edge lights and airport directional signage were installed along with new conduit and cable and the regulators in the vault were replaced. The “hammerhead” turnaround area northeast of Taxiway G was removed, as were the “hammerhead” turnaround areas southwest of Taxiway B. Construction was completed in 2019.

Present Projects

54-inch Sanitary Sewer South of Rickenbacker Parkway

In accordance with the City of Columbus' Sanitary Master Plan for Rickenbacker Southeast Service Area the construction will include a 54-inch gravity sanitary sewer approximately 2,400 feet in length that will tie into the Intermodal Sanitary Subtrunk Extension and include manholes for access and tie-in. The sanitary sewer will initially terminate at the end of Airport property and be extended south at a later date. Construction is anticipated to begin in 2021.⁴⁸

⁴⁸ City of Columbus, Intermodal Sanitary Subtrunk Extension (ISSE), Online at www.columbus.gov/Templates/Detail.aspx?id=2147514799.

LCK Airfield Improvements - Modification of Standards (MOS) Phase 2 Improvements

This project includes rehabilitation of runway pavement and expansion of runway shoulders on Runway 05R/23L at LCK. Runway 05R/23L will be widened by 80 feet (40 feet on either side) to accommodate ADG VI (200 feet wide and 40-foot shoulders) standards. Runway edge lights will be relocated/replaced along with airport directional and distance remaining signage. The blast pads will also be reconstructed to meet current standards. Intersecting Taxiway G fillets will be reconstructed to accommodate TDG 5 standards.

Additionally, the perimeter road will be extended along the southeast side of Runway 05R/23L and unnecessary airfield pavements will be removed to comply with storm water runoff quality requirements. Phase 2A was approved in 2019 and completed in 2020. Phase 2B received FAA approval in 2020 and construction is anticipated to begin in April 2021.

Rail Campus Commercial Development

The Rail Campus is an approximately 296-acre site on the northwest side of LCK that is currently available for commercial development. As noted in Chapter 3, this site is partially built upon and additional construction is underway in the middle of the site. It is anticipated that similar commercial warehouse development would continue to occur at this location. Two buildings have been constructed at this campus in 2017 and in 2020 with three available building sites remaining. An EA was conducted in accordance with NEPA for this proposed development and approved by the FAA in April 2007. Wetland impacts have been mitigated in accordance with USACE and OEPA Clean Water Act regulations through the issuance of a Section 404 permit and a Section 401 Water Quality Certification.

Former Golf Course Development Area

This site includes the former Landings at Rickenbacker Golf Course located east of the Intermodal Campus South. The land was acquired by the CRAA in 2015. The site is proposed for future development as a continuation of the Intermodal Campus South development. Due to the location of the site, it was determined the development did not require FAA approval; therefore, no NEPA clearance under FAA requirements was required. The proposed development did require a Clean Water Action Section 404 permit from the USACE for the filling of jurisdictional wetlands on the site and a Section 401 Water Quality Certification and Isolated Wetlands Permit from the OEPA. Potential wetland impacts have been mitigated in accordance with USACE and OEPA regulations. Permit requirements will ensure that no significant impacts to biological resources or historical, architectural, archaeological, or cultural resources would occur as a result of the development. There are three available building sites for future commercial warehouse facilities. This project also includes the extension of Rickenbacker Parkway Phase 3A, which will extend Rickenbacker Parkway as a two-lane road along the current alignment of Airbase Road/Wright Road (an interior perimeter road) to provide vehicle access to the Golf Course Development Area.

Reasonably Foreseeable Future Projects

North Airport Waterline Loop Connection

This project includes construction of approximately 5,900 feet of 12-inch waterline, including fire hydrants, appurtenances, and service connections for adjacent buildings. The CRAA expects to obtain funding for this project in 2021.

Rickenbacker Parkway Street Lighting Replacement with LEDs

This project includes replacement of poles, bases, fixtures, and cabling (as needed) to meet City of Columbus standards for light-emitting diode (LED) lighting technology along the full length of Rickenbacker Parkway, Port Road, and Alum Creek Drive. The CRAA expects to obtain funding for this project in 2022.

Roadway Improvements

As noted in Section 5.1.11.2, various roadway improvements have been proposed by MORPC to accommodate growth in the vicinity of the RGLP. These roadway projects include widening of Alum Creek Drive to the north of LCK and Ashville Road and Duvall Road to the southwest of LCK. Other recommended projects include various intersection improvements along Alum Creek Drive and U.S. 23. There is also a recommendation to further extend Rickenbacker Parkway beyond Phase 4 to the north of the Cargo Campus to connect with the area on the east side of LCK south of Groveport.

Infill Commercial Development

Several vacant building sites exist within the existing commercial development areas along Alum Creek Drive north of LCK and within the Intermodal Campus South that has been enlarged to include the former Landings at Rickenbacker Golf Course site. It is reasonable to expect that these sites will be developed at some point in the near future.

Remediation of Cargo Campus Site

The USACE is conducting an independent study to remediate the Cargo Campus and other sites that were subject to activities from the former use of the property as a military facility as described in Section 4.1.6 and 5.1.6. Specific remediation requirements are being finalized but may include ground disturbance and clearing of additional wooded areas.

The following sections summarize the potential cumulative impacts for each of the identified categories due to the above referenced projects.

5.2.2 Air Quality

Construction of the Proposed Action will cause an increase in emissions from temporary construction activity and impacts from operation. The results of the air quality analysis completed for this EA show that implementation of the Proposed Action as compared to the No Action would result in *de minimis* (negligible and insignificant)⁴⁹ increases in air emissions during construction. Therefore, the *de minimis* emissions defined for the Proposed Action, when combined with the present and future projects identified above, will not have the potential to change the current status of the air quality in Franklin or Pickaway County and will not result in significant cumulative impacts.

5.2.3 Biological Resources

Potential impacts to biological resources would be limited to loss of habitat for the Federally endangered Indiana bat and threatened northern long-eared bat. The Proposed Action would remove approximately 64 acres of wooded land that has been identified as containing suitable roosting trees during the summer foraging season for these protected species. Approximately ten acres of woodland within the site is proposed to be avoided.⁵⁰ An acoustic survey was conducted at the site in July 2020, and no protected bats were identified during that survey. Therefore, no impacts to the Indiana bat or northern long-eared bat would occur. No other habitat for threatened and endangered species was identified within the Proposed Action site. The USFWS determined that no adverse effects to federally endangered, threatened, proposed, or candidate species would be anticipated. Therefore, no cumulative impacts would occur to biological resources when combined with other past, present, and reasonably foreseeable future actions.

5.2.4 Farmland

Construction of the Proposed Action would eliminate 155 acres of land currently leased out by the CRAA to a local farmer. However, coordination with the NRCS determined that there would be no significant impacts to prime and unique farmland as a result of the Proposed Action. Other past and present projects in the vicinity of LCK, and the RGLP have included commercial development that has converted farmland to non-farmland. According to NRCS data, there is approximately 590,000 acres of farmland in Franklin and Pickaway counties. The conversion of farmland in the vicinity of LCK and the RGLP is a small percentage of the overall amount of farmland in the region. Therefore, when combined with the effects of other past, present, or reasonably foreseeable future projects, no significant impacts to farmland would occur.

5.2.5 Land Use

The Proposed Action is consistent with existing land use planning and zoning regulations. Land use development in the vicinity of the Proposed Action site has converted agricultural and rural residential land to commercial development. It is expected that this development trend will continue as demand for commercial development causes expansion of new facilities outward from the Airport and Intermodal Facility. This growth has been projected and utilities expansion and other incentives have been implemented by local governments and regional planning groups to promote development. Therefore, the cumulative development would not be inconsistent with land use plans.

⁴⁹ A Federal action that is demonstrated to cause *de minimis* emissions is defined as having negligible or insignificant impacts; reference FAA, *Aviation Emissions and Air Quality Handbook*, see Glossary entry for “*de minimis*,” January 2015. The phrase “*de minimis*” literally means “of minimum impact.” It is intended that qualification for *de minimis* means there will be no significant contamination of the air.

⁵⁰ The CRAA and developer intend to avoid this 10-acre wooded area. The USACE is currently conducting a study to determine clean-up requirements from former military training activity that occurred on this site. Depending upon the findings, USACE may be required to clear the trees to remediate the site.

5.2.6 Natural Resources and Energy Supply

The Proposed Action would result in use of resources for construction such as sand, gravel, aggregate, steel, and other typical construction materials. Other past, present, and reasonably foreseeable future projects would be expected to require similar construction materials. No shortages of these materials have been identified; therefore, no impact to the supply of construction materials is expected to occur from the cumulative effects of other projects.

The Proposed Action would require energy to provide lighting, heating, and cooling for the proposed development. Coordination with local utility providers has occurred and no shortage of capacity has been identified. Therefore, no cumulative impacts would occur to natural resources and energy supply.

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

Socioeconomic impacts of the Proposed Action include increases in surface vehicles during construction and operation of the Proposed Action. Traffic impacts are expected to be mitigated through continued upgrades to the existing road network as recommended by MORPC and would not result in significant impacts. No disproportionate environmental justice impacts or impacts to children's health and safety have been identified that could combine to be significant. Therefore, when combined with other past, present, and reasonably foreseeable future projects no significant socioeconomic impacts would occur.

5.2.8 Water Resources

The Proposed Action would result in the expansion of impervious surface area and impacts to wetlands and streams. Stormwater management facilities would be incorporated in the design and wetland and stream impacts would be mitigated to replace the loss of these features due to construction of the Proposed Action. It is anticipated that other past, present, and reasonably foreseeable future projects would be required to mitigate for the loss of any wetlands and provide for the management of stormwater runoff. Therefore, there would be no significant cumulative impacts to stormwater or wetlands or streams when combined with impacts from other projects.

Some of the other past, present, and future projects would increase stormwater runoff due to an increase in impervious surfaces. However, it is anticipated that any potential cumulative impacts to surface water or groundwater quality resulting from these projects would be negligible, as it would be mandatory for all projects to comply with existing and future water quality permit requirements. The Proposed Action includes improvements to the existing stormwater collection system, including new stormwater detention basins, to collect and treat runoff as a result of the increased impervious surface area. BMPs will also be employed during construction to limit erosion. Therefore, the Proposed Action, when combined with other past, present, and reasonably foreseeable future actions, would not be anticipated to cause significant impacts to water quality.

5.2.9 Summary of Cumulative Impacts

Based on the discussion above, the cumulative impacts of the Proposed Action, when added to the other past, present, and reasonably foreseeable future projects, is minimal. The Proposed Action would have effects on the environment similar to those that already exist. The limited impacts associated with the Proposed Action addressed in this EA, when considered with impacts from the other projects, are not anticipated to cause significant impacts. As necessary, mitigation procedures would be implemented to minimize potential adverse impacts that could occur during construction. Furthermore, impacts to wetlands and streams would be mitigated according to USACE and OEPA permit requirements.

5.3 Mitigation

5.3.1 Avoidance

Avoidance refers to measures taken to avoid resources to eliminate or reduce the severity of the effects on that resource. The Proposed Action was designed to potentially avoid an approximately ten-acre wooded area as shown on Exhibit 5-1. Additionally, one wetland and all of Stream 37 and sections of Streams 20 and 39 would be avoided as shown on Exhibit 5-4.

5.3.2 Minimization

Minimization refers to reducing potential impacts through design of facilities to minimize the effect of an action. The Proposed Action has been designed to meet the demand for adequately-sized cargo warehouse buildings with the smallest footprint possible while meeting the needs of the expected end users. While end users have not been identified at this time, the developer will work with prospective users to further refine the site plan to minimize the development footprint as much as possible.

5.3.3 Mitigation

Mitigation refers to rectifying the impact of a project by repairing, rehabilitating, or restoring the environment; reducing or eliminating the impact over time by preservation and maintenance operations during the life of the project; and compensating for the impact by replacing or providing substitute resources. Mitigation can include voluntary activities to reduce the potential for impacts or required activities that are conditions of environmental approval. In order to offset impacts to wetlands and streams, compensatory mitigation would be required as identified through ongoing coordination with the USACE and the OEPA. Mitigation for stormwater runoff has been incorporated into the design of the Proposed Action and would be constructed in accordance with the NPDES permitting requirements. Voluntary BMPs to limit erosion and fugitive dust during construction would be implemented as required by local regulations and to the extent practical by the developer.

5.4 Consistency with Approved Plans or Laws

The Proposed Action would be consistent with all Federal, state, and local environmental plans, laws, and/or administrative determinations. The Proposed Action is permitted by existing zoning and development regulations of Franklin and Pickaway Counties. The Proposed Action would meet permitting requirements of the Clean Water Act Section 401 and 404; and requirements of the NPDES permitting process.

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6 List of Preparers

In accordance with Federal Aviation Administration (FAA) Order 1050.1F, Section 6-2.1, this chapter provides a list of the individuals who assisted in the preparation of this Environmental Assessment.

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