

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION**

**GREAT LAKES REGION
DETROIT AIRPORTS DISTRICT OFFICE
ROMULUS, MICHIGAN**

FINDING OF NO SIGNIFICANT IMPACT

for

CARGO CAMPUS DEVELOPMENT - RICKENBACKER GLOBAL LOGISTICS PARK

at

**Rickenbacker International Airport (LCK)
Columbus Regional Airport Authority**

Columbus, Ohio



July 2021

I. INTRODUCTION

This document serves as the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) for the Cargo Campus development proposed at the Rickenbacker Global Logistics Park (RGLP), which is located south of the Rickenbacker International Airport (LCK) in Columbus, Ohio (Airport Sponsor's Proposed Action; proposed project). LCK is operated by the Columbus Regional Airport Authority (CRAA), the Airport Sponsor.

This FONSI has been prepared in compliance with the National Environmental Policy Act of 1969 (NEPA); FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*, and the Council on Environmental Quality (CEQ) regulations for implementing NEPA at Title 40 of the Code of Federal Regulations Part 1500-1508 (40 CFR 1500-1508). Based on the evaluation of the Final Environmental Assessment (Final EA) dated June 2021, there are no significant impacts associated with the Airport Sponsor's Proposed Action. Therefore, an Environmental Impact Statement (EIS) will not be prepared and a FONSI is being issued.

This FONSI provides a review of the Airport Sponsor's Proposed Action and the basis of the FAA's finding. Expected environmental consequences of the Proposed Action and mitigation commitments are defined and described in the Final EA dated June 2021.

II. AIRPORT SPONSOR'S PROPOSED ACTION & FEDERAL ACTION

The Airport Sponsor's Proposed Action is the development of the Cargo Campus at the RGLP. The RGLP is a public/private partnership comprised of CRAA, Capitol Square, Ltd., and Duke Realty Corporation. The Cargo Campus development includes construction of new commercial warehousing facilities and associated infrastructure on an approximately 330-acre property, located south of LCK.

The FAA analyzed the nexus of the Airport Sponsor's Proposed Action to Section 163 of the 2018 FAA Reauthorization Act (P.L. 115-254). The FAA lacks the legal authority to approve or disapprove changes to the Airport Layout Plan (ALP) for the Proposed Action; however, the release of the Airport Sponsor's Federal obligations to the 330-acre subject property acquired from the Federal Government as surplus property, is a Federal Action subject to NEPA.

The FAA's Federal Action is the release of CRAA's Federal obligations to the subject property. The Airport Sponsor's Proposed Action does not involve Airport Improvement Program (AIP) funding.

III. PURPOSE & NEED

The purpose of the Airport Sponsor's Proposed Action is to provide additional revenue to CRAA and accommodate demand for commercial/industrial facilities that include bulk distribution warehouses with access to an intermodal terminal within the Columbus Region. The Proposed Action will meet the need for bulk distribution warehouse space as well as CRAA's need to make LCK a more self-sufficient airport. This purpose and need is consistent with CRAA's program to develop underutilized airport-owned land in a way that is compatible with airport operations.

IV. ALTERNATIVES CONSIDERED

In accordance with FAA Order 1050.1F, the Final EA (Chapter 3) identified and evaluated all reasonable alternatives to the Proposed Action. The alternatives carried forward include the No Action Alternative and the Airport Sponsor's Proposed Action.

No Action Alternative

The No Action Alternative means the Cargo Campus property would remain undeveloped. The No Action Alternative does not meet the purpose and need of the Airport Sponsor's Proposed Action. The No Action Alternative is required under NEPA and serves as the baseline for determining the significance of environmental impacts.

Airport Sponsor's Proposed Action (Preferred Alternative)

The Airport Sponsor's Proposed Action is the alternative that meets the need to accommodate demand for commercial/industrial facilities that provide bulk distribution warehouses with access to air cargo facilities and the intermodal terminal within the Columbus region. The Proposed Action includes the following:

- Site preparation of the 330-acre Cargo Campus property located at LCK,
- Extension of Rickenbacker Parkway,
- Construction and operation of five commercial bulk distribution warehouse buildings totaling approximately 4.2 million square feet,
- Construction of paved parking and internal vehicle circulation roads,
- Extension of utilities to and within the Cargo Campus property, and
- Development of stormwater mitigation areas.

The 330-acre Cargo Campus property being released from Federal obligations is subject to the FAA's Federal Action described in this FONSI.

V. PUBLIC REVIEW & COMMENT

Public involvement and agency coordination was conducted by CRAA at the beginning of the EA process. When constructed, the proposed development would comply with zoning regulations and be consistent with local land use strategies and planning.

The Draft EA was available for review by the general public, government agencies, and interested parties for a period of 30 days. A public Notice of Availability (NOA) of the Draft EA was published on the CRAA website on March 19, 2021, where the document was available for download. The NOA was also published in three (3) newspapers of general circulation, *ThisWeek – Canal Winchester Times*, *Columbus Dispatch*, and *Southeast Messenger*, on March 20 and 21, 2021. Letters notifying agencies and interested parties of the availability of the Draft EA were also distributed. Hard copies of the Draft EA were available for public review by appointment with CRAA, the Pickaway County Library, and the Columbus Metropolitan Library Southeast Branch. Due to restrictions related to the COVID-19 public health emergency, a virtual public workshop/hearing was offered on April 20, 2021.

The 30-day review and comment period extended from March 19, 2020 to April 20, 2021. Comments were accepted until May 5th 2021. Comments were not received from members of the public. Comments were received from the U.S. Fish and Wildlife Service (USFWS), U.S. Department of Housing and Urban Development (HUD), and U.S. Environmental Protection Agency Region 5 (USEPA). Agency Coordination materials are included in Appendix A, B, C, D, and F of the Final EA. Public Involvement materials are included in Appendix G of the Final EA.

VI. ENVIRONMENTAL CONSEQUENCES & MITIGATION

The Final EA (Chapter 5) describes the environmental consequences of the Airport Sponsor's Proposed Action and proposed avoidance and minimization and mitigation measures. CRAA shall implement the following mitigation measures as a condition of environmental approval of the Proposed Action listed in this FONSI.

1. Biotic Communities / Threatened and Endangered Species

The Airport Sponsor's Proposed Action includes clearing of approximately 64 acres of woodland that includes potentially suitable summer roosting habitat for the Indiana bat (*Myotis sodalis*) and the northern long-eared bat (*Myotis septentrionalis*). On April 16, 2021, the USFWS concurred the proposed project is not likely to adversely affect federally endangered, threatened, proposed, or candidate species.

Mitigation

Tree clearing shall occur between October 1 and March 31 to avoid potential impacts to the Indiana bat, the northern long-eared bat, and migratory bird species. No tree clearing should occur on the site after March 31, 2026 without further coordination with the USFWS.

2. Water Resources – Wetlands and Surface Water

The Airport Sponsor's Proposed Action includes permanent impacts to approximately 4.3 acres of wetlands and 4,900 linear feet of streams. The proposed impacts require authorization under Section 404 and Section 401 of the Clean Water Act (CWA). CRAA is required to secure a Section 404 Individual Permit from the U.S. Army Corps of Engineers (USACE). In addition, CRAA will also secure a Section 401 Water Quality Certification (WQC) and an Isolated Wetland Permit and Ephemeral Stream Permit from the Ohio Environmental Protection Agency (OEPA) Division of Surface Water.

CRAA evaluated areas to avoid or minimize wetland/stream impacts to the extent practicable by proposing the smallest footprint possible while providing an adequately sized development. This proposed project was designed to potentially avoid an approximately 10-acre wooded area, one wetland, and all or part of existing streams. There are no prudent, feasible, or reasonable alternatives to avoid all impacts to wetlands and streams due to site, engineering, and design constraints.

Mitigation

CRAA will obtain USACE and OEPA permits prior to the start of the construction. Surface waters and wetlands not impacted by the Proposed Action shall be protected during construction.

Compensatory mitigation for unavoidable impacts to wetlands and streams must be implemented in accordance of USACE and OEPA permit requirements. CRAA is required to ensure compliance with mitigation requirements associated with the Proposed Action prior to construction. As described in the Final EA, it is expected that mitigation for unavoidable impacts to wetlands and streams would include

purchasing credits at either the Big Derby Hellbranch, Little Scioto, and/or the Red Stone Farm mitigation banks; use of previously purchased mitigation credits; and payment to the Nature Conservancy or the Stream + Wetlands Foundation In Lieu-Fee Programs. Options to preserve existing aquatic features on CRAA owned property are also under consideration.

If mitigation is proposed in the vicinity of LCK, FAA Advice Circular (AC) 150/5200-33, *Hazardous Wildlife Attractants on or Near Airports* (or current version at time of construction), must be followed.

Based upon information related to wetland and stream impacts presented in the Final EA and the proposed mitigation strategy, and in accordance with wetland protection provisions of Executive Order 11990, *Protection of Wetlands*, the FAA finds that: (a) there is no practicable alternative to the Airport Sponsor's Proposed Action; and (b) the Airport Sponsor's Proposed Action includes all practicable measures to minimize harm to wetlands which may result from such use.

3. General Construction Impacts

The Airport Sponsor's Proposed Action will include temporary construction impacts. Construction activities within the 330-acre Cargo Campus site include: site preparation (e.g., clearing, grading); extension of Rickenbacker Parkway; construction of paved parking and internal circulation roads; construction of five commercial warehouse buildings; installation of utilities; and construction of stormwater detention facilities to accommodate the increase in impervious surface.

Fugitive dust, noise, vibrations, erosion and sedimentation impacts during the construction may occur, but are expected to be localized and temporary. As with any construction activity, noise levels and/or traffic as well as usage of fuel would increase during construction activities. Construction activities are expected to take place during the daytime and construction haul routes would be established to avoid residential areas. The analysis contained in the Final EA concluded the Airport Sponsor's Proposed Action (construction and operation) would not cause an increase in air emissions above *de minimis* thresholds. The Airport Sponsor would stipulate the developer require measures to reduce fugitive dust emissions during construction by adhering to guidelines such as FAA AC 150/5370-10H, *Standards for Specifying Construction of Airports* (or current version at time of construction). Negative impacts related to light emissions or visual resources are not expected from construction, as work is expected to occur during daytime hours, be temporary in nature, and cease when construction is complete. Construction activities do not involve a need for unusual materials or those in short supply; however, the use of resources such as sand, gravel, aggregate, steel, and other typical construction materials would occur. Coordination with local utility providers did not identify a shortage of energy capacity (i.e., lighting, heating, cooling) as a result of the proposed project.

Mitigation

Coordination with OEPA Division of Surface Water regarding design/construction of proposed stormwater detention facilities and National Pollution Elimination System (NPDES) permitting in accordance with Section 402 of the CWA is required to implement the Airport Sponsor's Proposed Action. Design of stormwater facilities shall follow all guidelines listed in FAA AC 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports* (or current version at time of construction) to ensure the facilities would not cause a wildlife hazard.

Mitigation measures associated with construction activities are discussed in applicable sections of Chapter 5 in the Final EA. Construction documents will identify specific environmental control methods to minimize noise, air, and water quality impacts during construction. Appropriate Best Management

Practices (BMPs) and guidelines set forth in FAA AC 150/5370-10H, *Standards for Specifying Construction of Airports* (or current version at time of construction) will be implemented. Water quality impacts will be minimized by implementing sediment and erosion control measures in compliance with NPDES regulations for stormwater discharges from construction activities. OEPA regulations will be followed, as required.

All necessary permits and approvals necessary for implementing the Airport Sponsor's Proposed Action shall be obtained from Madison Township, Franklin County, Pickaway County, the State of Ohio, the USACE, and the FAA prior to construction. The 330-acre Cargo Campus property is located in zoning districts that allow large commercial warehouses; thus, the Airport Sponsor's Proposed Action is consistent with local land use plans and strategies.

VII. FAA FINDING

After careful and thorough consideration of the facts contained in the Final EA, the undersigned finds the proposed Federal Action is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of NEPA and other applicable environmental requirements, and will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to section 102(2)(C) of NEPA. As a result, the FAA will not prepare an EIS for this Federal Action.

Having met all relevant requirements for environmental considerations and consultations, the proposed Federal Action is authorized to be taken at such time as other requirements are met.

These decisions are taken pursuant to 49 U.S.C. § 40101, et seq. The FAA finding regarding the release of airport land from all restrictions and conditions of agreements within the U.S. government, constitute an order of the Administrator, which is subject to review by the Court of Appeals of the United States, in accordance with the provisions of Section 1006 of Federal Aviation Act of 1958, as amended, 49 U.S.C. § 46110.

APPROVED: X

DISAPPROVED:

JOHN L.
MAYFIELD JR

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John L. Mayfield Jr., Manager
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Date