

Appendix H

Comments and Responses on Draft EA



September 3, 2006

Mr. Norman Hegedus
Aviation Environmental Planner
Miami-Dade Aviation Department Aircraft Noise & Environmental Planning Office
P.O. Box 592075
Miami, Florida 33159

Re: Comments on Environmental Assessment
Kendall-Tamiami Executive Airport Runway Extension

Dear Mr. Hegedus,

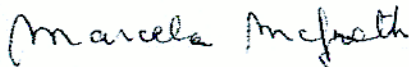
I have reviewed your environmental assessment (EA) for the proposed runway extension. I appreciate the opportunity to comment on the proposed action.

In section 5-32, the EA states that two active burrowing owl nests will be impacted by the proposed extension. It further states that the burrows are to be collapsed and that no replacement burrows shall be constructed. While I understand that FAA guidelines recommend against enhancing burrowing owl habitat in an airport, I find it appalling that no off-site mitigations are proposed. How can your agency propose to spend millions of dollars of taxpayer money on this project and not spend a single dime on off-site burrowing owl habitat enhancement? It is heartless. I disagree with your conclusion that burrow collapse without any offsite habitat compensation is sufficient mitigation to reduce the level of impact to a level that is less than a significant. The proposed "mitigation" activities merely serve to prevent directly killing burrowing owls, but by taking away their nesting habitat and not performing offsite habitat enhancement and relocating the owls, you are killing them all the same.

Burrowing owls are one of the things that make Florida such a beautiful place to live. I have often enjoyed watching burrowing owls and I know that kids love them. The owls provide great benefit to the people of the State. With the rampant development in this county, such as your proposed action, burrowing owls are finding it harder and harder to find suitable nesting habitat.

If your agency truly cared about the quality of life in Miami-Dade County, the least it could do is perform offsite habitat enhancement for burrowing owls and relocate the owls.

Sincerely,



Marcela McGrath
7300 Poinciana Court
Miami Lakes, FL 33014

Cc: Ronald A. Smith, Division Director for Operations and General Aviation, 12800 S.W.
145 Avenue, Miami, FL 33186
Michael J. Handrahan, C.M. Airport Manager, 12800 S.W. 145 Ave, Miami, FL 33186
County Commissioner Natacha Seijas
Miami Dade Mayor Carlos Alvarez

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SEP 11 2006

**NOISE
ABATEMENT**

September 3, 2006

Mr. Norman Hegedus
Aviation Environmental Planner
Miami-Dade Aviation Department Aircraft Noise & Environmental Planning Office
P.O. Box 592075
Miami, Florida 33159

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Kendall-Tamiami Executive Airport Runway Extension

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Sincerely,


Douglas G. Scofield

Cc: Ronald A. Smith, Division Director for Operations and General Aviation, 12800 S.W.
145 Avenue, Miami, FL 33186
Michael J. Handrahan, C.M. Airport Manager, 12800 S.W. 145 Ave, Miami, FL 33186
County Commissioner Katy Sorenson

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Comment Form
Environmental Assessment
Kendall-Tamiami Executive Airport
Public Hearing - September 13, 2006

Please use this form to express your comments and/or suggestions

There are burrowing owls in the path of the proposed runway, will not the noise drive them away, too??
Length of runway increases size of planes and risk to residents, as well as noise pollution.

Residents bought homes near a small airport and may experience loss of value of homes.

Judy M Palmer
Science Teacher

Please turn this form in tonight or mail so that it will be received by September 27th to:

Mr. Norman Hegedus, Aviation Environmental Planner
Miami-Dade Aviation Department
Aircraft Noise & Environmental Planning Office
P.O. Box 025504
Miami, Florida 33102

**Comment Form
Environmental Assessment
Kendall-Tamiami Executive Airport
Public Hearing - September 13, 2006**

Please use this form to express your comments and/or suggestions

I am very happy about the extension of the run way because it will increase business for the airport.

The increase in business represents more jobs and more opportunities.

At the moment that property is unused and of no benefit to anyone.

I really would like to see the project come to completion

Emma Mestre

786-875-5324

Please turn this form in tonight or mail so that it will be received by September 27th to:

**Mr. Norman Hegedus, Aviation Environmental Planner
Miami-Dade Aviation Department
Aircraft Noise & Environmental Planning Office
P.O. Box 025504
Miami, Florida 33102**



FLORIDA DEPARTMENT OF STATE

Sue M. Cobb

Secretary of State

DIVISION OF HISTORICAL RESOURCES

Mr. Mike Alberts
ESA Airports
1715 N. Westshore Boulevard, Suite 780
Tampa, Florida 33607

November 7, 2006

Re: DHR Project File No. 2006-09092 / Date Received by DHR: October 4, 2006
Cultural Resource Assessment Survey of Proposed Improvements to the Kendall-Tamiami Executive Airport (TMB), Miami-Dade County

Dear Mr. Alberts:

Our office received and reviewed the above referenced survey report in accordance with Section 106 of the *National Historic Preservation Act of 1966* (Public Law 89-665), as amended in 1992; *36 C.F.R., Part 800: Protection of Historic Properties*; and Chapter 267, *Florida Statutes*, for assessment of possible adverse impact to cultural resources (any prehistoric or historic district, site, building, structure, or object) listed, or eligible for listing, in the *National Register of Historic Places (NRHP)*, or otherwise of historical, architectural or archaeological value.

In August 2006, Janus Research conducted a cultural resource assessment survey of the Proposed Improvements to the Kendall-Tamiami Executive Airport on behalf of ESA Airports Group. Janus Research did not locate any archaeological or historical sites during the course of the investigation.

It is the opinion of Janus Research that the proposed development will have no effect on cultural resources listed or eligible for listing in the *NRHP*. Janus Research recommended no further investigation of the subject parcel.

Based on the information provided, our office concurs with these determinations and finds the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

If you have any questions concerning our comments, please contact Scott Sorset, Historic Sites Specialist, by phone at (850) 245-6333, or by electronic mail at srsorset@dos.state.fl.us. Your continued interest in protecting Florida's historic properties is appreciated.

Sincerely,

Frederick P. Gaske, Director, and
State Historic Preservation Officer

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

Director's Office
(850) 245-6300 • FAX: 245-6436

Archaeological Research
(850) 245-6444 • FAX: 245-6452

Historic Preservation
(850) 245-6333 • FAX: 245-6437

Historical Museums
(850) 245-6400 • FAX: 245-6433

Southeast Regional Office
(954) 467-4990 • FAX: 467-4991

Northeast Regional Office
(904) 825-5045 • FAX: 825-5044

Central Florida Regional Office
(813) 272-3843 • FAX: 272-2340



FLORIDA DEPARTMENT OF STATE

Sue M. Cobb

Secretary of State

DIVISION OF HISTORICAL RESOURCES

September 28, 2006

Mr. Norman Hegedus
Miami-Dade Aviation Department
Aircraft Noise & Environmental Planning
P.O. Box 025504
Miami, FL 33102-5504

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OCT 04 2006

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ABATEMENT

RE: DHR Project File No.: 2006-8768
Received by DHR: August 9, 2006
Federal Aviation Administration
Draft Environmental Assessment - Extension and Paving of Runway 9R-27L
Kendall-Tamiami Executive Airport
Miami-Dade County

Dear Mr. Hegedus:

Our office received and reviewed the above referenced project in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended and *36 CFR Part 800: Protection of Historic Properties* and the *National Environmental Policy Act of 1969*, as amended. The State Historic Preservation Officer is to advise Federal agencies as they identify historic properties (listed or eligible for listing in the *National Register of Historic Places*), assess effects upon them, and consider alternatives to avoid or minimize adverse effects.

We reviewed "Section 4.2.3: Historic, Archaeological and Cultural Resources; and Appendix F: "Cultural Resource Assessment Survey of Proposed Improvements to the Kendall-Tamiami Executive Airport (TMB), Miami-Dade County" of the Draft Environmental Assessment (DEA). This office requested a cultural resources assessment of the airport in May 2006 and note that the survey was completed in June 2006, but was not submitted for review by this office. Please forward an original copy of the report and log sheet for our review and for inclusion in the Florida Master Site File survey manuscript inventory. It is standard procedure to submit such requested surveys directly to this office for review and comment.

However, this office concurs with the findings of the DEA that the proposed improvements at the Kendall-Tamiami Executive Airport will have no effect on historic properties.

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

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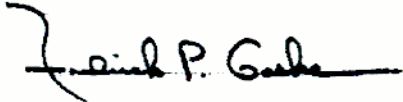
Northeast Regional Office
(904) 825-5045 • FAX: 825-5044

Central Florida Regional Office
(813) 272-3843 • FAX: 272-2940

Mr. Norman Hegedus
September 28, 2006
Page 2

We look forward to receiving the requested report and providing our official review and comments. If you have any questions, please contact James Toner, Historic Sites Specialist, by telephone at 850-245-6333, or by electronic mail jtoner@dos.state.fl.us.

Sincerely,



Frederick P. Gaske, Director, and
State Historic Preservation Officer.



John Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Colleen M. Castille
Secretary

September 26, 2006

Mr. Norman Hegedus, Aviation Environmental Planner
Miami-Dade Aviation Department
Aircraft Noise and Environmental Planning
Post Office Box 025504
Miami, Florida 33102-5504

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OCT 04 2006

NOISE
ABATEMENT

RE: Federal Aviation Administration – Draft Environmental Assessment for
Proposed Extension of Runway 9R-27L, Kendall-Tamiami Executive Airport –
Miami-Dade County, Florida.
SAI # FL200608092675C

Dear Mr. Hegedus:

The Florida State Clearinghouse, pursuant to Presidential Executive Order 12372, Gubernatorial Executive Order 95-359, the Coastal Zone Management Act, 16, U.S.C. §§ 1451-1464, as amended, and the National Environmental Policy Act, 42 U.S.C. §§ 4231, 4331-4335, 4341-4347, as amended, has coordinated a review of the referenced environmental assessment.

The Florida Department of Environmental Protection (DEP), Southeast District office in West Palm Beach has reviewed environmental assessment and determined that there may be environmental issues concerning possible areas of contamination within the proposed boundaries of the construction site. For a detailed discussion of the potential issues, please see the enclosed DEP memorandum.

The Florida Department of Transportation (FDOT) notes that based upon a review of the Draft EA, there are no environmental issues of concern (e.g. cultural resources), with the exception of several burrowing owl burrows located within the eastern runway extension area. It appears that there are no state roads in the vicinity of the airport that will be involved in this action. FDOT staff notes that SW 137th Avenue becomes SR 825 in the northeastern quadrant of airport property; however, the proposed eastern runway extension is located in the southeastern quadrant of the property. If you have any questions or need further assistance, please contact Ms. Catherine Owen at (305) 470-3399 or Ms. Marjorie Bixby at (305) 470-5220.

Based on the information contained in the scoping notice and the enclosed state agency comments, the state has determined that, at this stage, the proposed federal action is consistent with the Florida Coastal Management Program (FCMP). The concerns identified by our reviewing agencies must be addressed, however, prior to project implementation. The state's continued

"More Protection, Less Process"

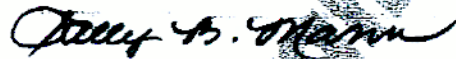
Printed on recycled paper.

Mr. Mr. Norman Hegedus
September 26, 2006
Page 2 of 2

concurrency with the proposal will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews. The state's final review of the project's consistency with the FCMP will be conducted during the environmental permitting stage, if applicable.

Thank you for the opportunity to review this proposal. Should you have any questions regarding this letter, please contact Mr. Christopher J. Stahl at (850) 245-2169.

Sincerely,



Sally B. Mann, Director
Office of Intergovernmental Programs

SBM/cjs
Enclosures

cc: Tim Gray, DEP, Southeast District
Lisa Stone, FDOT

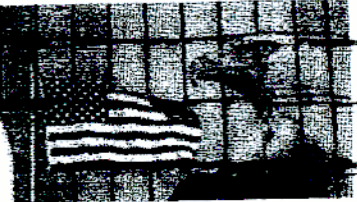
Florida State Clearinghouse



Florida

Department of Environmental Protection

"More Protection, Less Process"



[DEP Home](#) | [OIP Home](#) | [Contact DEP](#) | [Search](#) | [DEP Site Map](#)

Project Information	
Project:	FL200608092675C
Comments Due:	09/11/2006
Letter Due:	09/27/2006
Description:	FEDERAL AVIATION ADMINISTRATION - DRAFT ENVIRONMENTAL ASSESSMENT FOR PROPOSED EXTENSION OF RUNWAY 9R-27L, KENDALL-TAMIAMI EXECUTIVE AIRPORT - MIAMI-DADE COUNTY, FLORIDA
Keywords:	FAA - DEA, RUNWAY 9R-27L EXTENSION, KENDALL-TAMIAMI EXEC. AIRPORT - MIAMI-DADE
CFDA #:	20.106
Agency Comments:	
SOUTH FL RPC - SOUTH FLORIDA REGIONAL PLANNING COUNCIL	
No Comment	
MIAMI-DADE -	
FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION	
No Comment	
STATE - FLORIDA DEPARTMENT OF STATE	
No Comments Received	
TRANSPORTATION - FLORIDA DEPARTMENT OF TRANSPORTATION	
Based upon a review of the Draft EA, there are no environmental issues of concern (e.g. cultural resources), with the exception of several burrowing owl burrows located within the eastern runway extension area. It appears that no State Roads in the vicinity of the airport will be involved in this action. FDOT staff notes that SW 137th Avenue becomes SR 825 in the northeastern quadrant of airport property; however, the proposed eastern runway extension is located in the southeastern quadrant of the property. Thank you for providing us with the opportunity to comment. Should you have any questions, please contact Catherine Owen at (305) 470-5399 or Marjorie Bixby at (305) 470-5220.	
ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	
A contamination assessment may be needed since the airport had hurricane debris staging and transfer station in the aftermath of Hurricane Andrew. M-DAD should maintain a list of hazardous material handlers, names, addresses and telephone numbers of contact persons, types, locations and quantities of hazardous materials handled, etc. for contingency planning in the event of a fire, spill, environmental release or storm event. If any of these handling areas are located in an area affected by one of the alternatives during construction, contamination screening evaluations should be conducted prior to construction. The Department's storage tank registration data shows some discrepancies and will require some clarification and updating from M-DAD. Some of the ID numbers referenced above appear to be associated with discharges. Groundwater monitoring wells may be present. Arrangements need to be made to properly abandon and or replace any wells during construction. There may be water production wells (irrigation, potable, industrial) in the vicinity of this project. The locations, types of wells, ownership information, etc. within a 1/4 mile radius of the airport should be determined and included in the DRI. Dewatering projects would require permits / approval from the South Florida Water Management District, Water Use Section and coordination with the Miami-Dade Department of Environmental Resources Management. DEP and the Miami-Dade Department of Environmental Resources Management needs to be notified in the event contamination and project managers may need to address the problem through additional assessment and/or remediation activities. Any land clearing or construction debris must be characterized for proper disposal. All wastes and materials must be properly managed in accordance with Chapter 62-730 and 62-701 F.A.C.	
SOUTH FLORIDA WMD - SOUTH FLORIDA WATER MANAGEMENT DISTRICT	
Released Without Comment	

Florida Department of
Environmental Protection

Memorandum

TO: Chris Stahl, Office of Intergovernmental Programs

THROUGH: Tim Gray, Southeast District

FROM: Paul Alan Wierzbicki, Southeast District

DATE: September 15, 2006

SUBJECT: Federal Aviation Administration - Draft Environmental Assessment for Proposed Extension of Runway 9R-27L, Kendall-Tamiami Executive Airport - Miami-Dade County, Florida.
SAI # FL06-2675C

I have reviewed the referenced State Clearinghouse Item (received August 11, 2006) and have the following comments within the scope of the Waste Cleanup Section:

1. The Miami-Dade Aviation Department (M-DAD) is proposing to implement a runway extension at Kendall-Tamiami Executive Airport to allow the airport to operate its role as a reliever airport to Miami International Airport. The proposed action involves extending Runway 9R-27L to a total length of 7,300 feet. This would include a 550-foot extension to the east end of the runway and a 1,798 foot extension to the west end of the runway. According to the M-DAD, the proposed runway extension would be on existing airport property and no property acquisition would be necessary. The airport is located in Township 55, Range 39 and is bordered by Southwest 136th Street to the south, Southwest 120th Street to the north, Southwest 137th Avenue to the east and Southwest 157th Avenue to the west. The airport supports general aviation operations as well as vintage aircraft displays at the Weck's Aviation Museum and helicopter operations of the Miami-Dade County Sheriff's Department, Air Rescue, Aeromed and various news channels.
2. Page 4-18 states that the approach end of Runway 27L was used for a year (between September 1992 and September 1993) as a hurricane debris staging and transfer station in the aftermath of Hurricane Andrew. The majority of the debris handled was vegetation clippings and building debris. Was any of this debris or ash buried on site? If so, a contamination assessment may be needed.
3. Page 4-18 states that hazardous materials present at the airport include the following: aviation fuels, motor fuels, substances used to operate or maintain aircraft, ground vehicles, equipment and buildings, and various hazardous materials transported to and from the airport via ground vehicles and aircraft. In addition to aviation fuels, smaller quantities of other hazardous materials are stored and used at the airport by tenants including solvents, degreasers, cleaners, paints, paint thinners, diesel, welding gasses and pesticides in support of aircraft, ground vehicle and building and grounds maintenance operations. M-DAD should maintain a list of hazardous

Memorandum
September 15, 2006
Page 2 of 3

material handlers, names, addresses and telephone numbers of contact persons, types, locations and quantities of hazardous materials handled, etc. for contingency planning in the event of a fire, spill, environmental release or storm event. If any of these handling areas are located in an area affected by one of the alternatives during construction, contamination screening evaluations should be conducted prior to construction.

4. Page 4-19 states that there are approximately 100,000 gallons of fuel stored in six above-ground tanks storing avgas, jet A fuel and other fuels. Also, the report states that there are two 10,000-gallon underground tanks in operation at this airport and used to store Avgas at Buildings 114 and 221. Further, the report states that nine tenants conduct aircraft maintenance and 10 conduct fueling operations. A listing of these facilities with addresses, phone numbers and contact persons, Facility Identification numbers, etc., along with maps showing these locations should be included for contingency planning. A brief review of the Department's storage tank registration data base appears to show some discrepancies and will require some clarification and updating from M-DAD. Some Facility Identification Numbers that appear to be at this airport are: 138506190, 139600736, 139601695 (FAA), 139700942, 139600736 (FAA). I could not locate an identification number for the six above ground tanks mentioned in the DRI.

5. Page 4-19, 5th paragraph states that "No known leaks from USTs at the airport have occurred." However, some of the ID numbers referenced above appear to be associated with discharges. A complete listing of regulated storage tanks at the facility, along with cleanup status is also needed.

6. Groundwater monitoring wells may be present along and near the entire length of the project. Arrangements need to be made to properly abandon (in accordance with Chapter 62-532, Florida Administrative Code) and or replace any wells that may be destroyed or damaged during construction.

7. This project falls within the limits of the Biscayne Aquifer and this is a "sole source" aquifer in this part of Florida. There may be water production wells (irrigation, potable, industrial) in the vicinity of this project. The locations, types of wells, ownership information, etc. within a 1/4 mile radius of the airport should be determined and included in the DRI. Will dewatering be required for the construction? Construction project segments involving "dewatering" should be discouraged or limited, since there is a potential to spread contamination to previously uncontaminated or less contaminated areas and affect contamination receptors, site workers and the public. Dewatering projects would require permits / approval from the South Florida Water Management District, Water Use Section and coordination with the Miami-Dade County Department of Environmental Resources Management.

8. In the event contamination is detected during construction, the Department and Miami-Dade County Department of Environmental Resources Management need to be notified and project managers may need to address the problem through additional assessment and/or remediation activities.

Memorandum
September 15, 2006
Page 3 of 3

9. ~~Any land clearing or construction debris must be characterized for proper disposal.~~ Potentially hazardous materials must be properly managed in accordance with Chapter 62-730, Florida Administrative Code (F.A.C.). In addition, any solid wastes or other non-hazardous debris must be managed in accordance with Chapter 62-701, F.A.C. Department rules and statutes are found on the DEP's Internet Web site: <http://www.dep.state.fl.us/legal/Default.htm>

10. Please be advised that a new rule, 62-780, F.A.C., became effective on April 17, 2005. In addition, Chapters 62-770, 62-777, 62-782 and 62-785, F.A.C., were amended on April 17, 2005 to incorporate recent statutory changes. These rules may be found at the following website: <http://www.dep.state.fl.us/waste/>

11. ~~Staging areas, with controlled access, should be planned in order to safely store raw~~ material paints, adhesives, fuels, solvents, lubricating oils, etc. that will be used during construction. All containers need to be properly labeled. The project managers should consider developing written construction Contingency Plans in the event of a natural disaster, spill, fire or environmental release of hazardous materials stored / handled for the project construction.

Thank you for the chance to comment.



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
MIAMI REGULATORY OFFICE
11420 NORTH KENDALL DRIVE, SUITE 104
MIAMI, FLORIDA 33410

REPLY TO
ATTENTION OF

CESAJ-RD-S-M (1145)

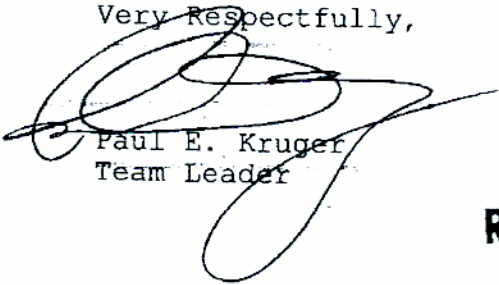
September 15, 2003

Miami-Dade Aviation Department
Aircraft Noise and Environmental Planning
Attention: Mr. Jeffery R. Bunting
P. O. Box 592075
Miami, Florida 33159

SUBJECT: Request for comments with reference to a Draft Environmental Assessment for the Proposed Extension of Runway 9R-27L at the Kendall-Tamiami Executive Airport.

1. The Corps has reviewed your correspondence. The work proposes a 7,350 foot linear extension on existing airport property.
2. The Corps regulates wetlands in this area. Paragraph 5.9.1 states that a field survey was conducted and that two canals adjacent to the work will not be impacted. It is further stated that no wetlands will be impacted by the work.
3. Relying on the representations made in the submittal, the Corps at this time does not believe a federal Clean Water Act permit will be required.
4. Point of contact for this response is Mr. Paul Kruger, at 305-526-7185, or paul.e.kruger@saj02.usace.army.mil, Team Leader of CESAJ-RD-SM, Regulatory Division's Miami Field Office.

Very Respectfully,


Paul E. Kruger
Team Leader

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SEP 24 2006

**NOISE
ABATEMENT**



United States Department of the Interior
NATIONAL PARK SERVICE

Everglades and Dry Tortugas National Parks
40001 State Road 9336
Homestead, Florida 33034



In Reply Refer to
L7615-FY-06-020

October 11, 2006

Mr. Norman Hegedus, Aviation Environmental Planner
Miami-Dade Aviation Department
Aircraft Noise & Environmental Planning Office
P.O. Box 592075
Miami, Florida 33159

Reference: Draft Environmental Assessment for proposed runway 9R/27L extension for Kendall-Tamiami Executive Airport

Dear Mr. Hegedus:

Thank you for the opportunity to review and comment on the *Draft Environmental Assessment (EA) for proposed runway 9R/27L extension for Kendall-Tamiami Executive Airport (TMB)*. We have a number of concerns that were outlined in our letter to you on the scoping documents for this project in May, 2006, that we feel this draft EA has not been adequately responsive to and in some cases find the draft EA responses inaccurate. In short, 8 of the 9 issues, raised in our May 2, 2006 letter (Appendix B), center on the premise that there will be an increase in the number of flights arriving and departing from the airport and that larger planes would be accommodated by the runway expansion being proposed. This premise is confirmed in the draft EA where the draft EA provides existing data (for 2005) and expected flight data (for 2009 and 2015). The total flights (annually) would go from 186,540 (2005) to 203,843 (2009) to 220,534 (2015). This translates to a total of 511 flights/day (2005), 568 flights/day (2009), and 604 flights/day (2015) and equates to 11% more flights in 2009 and 18% more in 2015; which is inconsistent with the continuous assertion in the MDAD response to our comments that: "...there would be no increase in the number of aircraft arriving or departing TMB.

The notion that the proposed project would increase future use of TMB is further supported by the letters from 13 private air carrier companies and related businesses (Appendix B) that indicate greater business opportunities that will result from the lengthened runway and the ability for planes to carry heavier loads and transport for greater distances, and under safer conditions.

The data in the EA suggests that nearly all of the increase in flights occurs in the general aviation category: 134,000 (2005), 146,500 (2009), 158,700 (2015); and the helicopter category: 49,400 (2005), 54,000 (2009), 58,500 (2015). These uses appear to create greater use of park airspace.

These concerns are described in more detail below; following the categories our original comments were provided.

Noise

ENP comment F-2A (page 181 of the EA). Our concern here remains with the increased numbers of flights and with more flights with larger planes that would potentially increase noise levels over the park.

Your response states that the proposed action (lengthening the 9R-27L runway by approximately 2,300 feet) would not increase the number of aircraft arriving or departing the TMB. This appears to be inconsistent with the summary tables in the draft EA. Table 4.2.2-1 lists the number of 2005 aircraft operations (baseline year) with a total of 186,540 flights for the year (or an average of 511 flights/day). Both of the summary tables for the expected number of flights in 2009 and 2015 show increases in the total number of flights/year. For the 2009 estimate (Table 5.1-1) total aircraft operations increase to 203,843 flights per year (or an average of 558 flights/day). This is an increase of 17,303 flights/year or a 9% increase over 2005 levels. For the 2015 estimate (Table 5.1-10) total aircraft operations increase to 220,534 flights per year (or an average of 604 flights/day). This is an increase of 33,993 flights/year or a 15% increase over 2005 levels. We are not certain of the standards for aircraft operations, but an increase of over 90 aircraft operations per day from a baseline of approximately 510/day appears to be a significant increase that may affect the noise shed and experience of our visitors to the northern part of Everglades National Park, particularly Chekika Recreation Area. The majority of these increases are estimated to occur in the general aviation flight class, which the EA says would potentially impact Everglades National Park (Park) the most. (Note we have translated aircraft operations to represent arriving and departing flights, including local training flights with repeated touch-downs.)

Analysis of the primary flight corridor maps for the base condition (figures 4-3 and 4-4) and the tables that show the arrival and departure percentages for each corridor (tables 4.2.2-7 and 4.2.2-8) indicate that for both arriving and departing flights the east flow corridor has the highest percentage of flights (east arrivals were 76-90% versus west arrivals of 10-24%, and east departures were 78-86% versus west departures of 20-22%). This percentage is stated to remain the same in the future (EA page 5-3 and 5-10). The continued dominance in the eastward departures/arrivals is better for the Park, except that a large number of the west departing flights pass over the park, and many of the east departing flights quickly turn 180 degrees and then pass over the Park. Again, the majority of these flights pass directly over portions of Northeast Shark Slough and the headwaters of Taylor Slough in the Park, and these flights are at low altitudes. The draft EA states that the westward arriving aircraft would be up to 100 feet lower as they pass over the Park, after the runway extension. The draft EA

further states that all flights would generally remain above 1,500 feet as they pass over the Park.

Natural Soundscapes

ENP comment is F-2B (page 181). Our concern here continues to be tied to an increase in the number of flights and more flights with larger planes that would diminish natural soundscapes in the Park which is part of the a visitor experience, (natural sound is one the values that National Parks protect).

The draft EA response again states that there would be no increase in the number of aircraft arriving or departing TMB (which is not consistent with the summary data on aircraft operations). The EA response further state that the potential change in sound levels would be imperceptible. The draft EA provides an estimate of the noise levels over the park. They estimate that the current (2005) noise level is 42.6 DNL (this is the day-night average sound level in decibels). Next they compare this to the estimated 2009 and 2015 sound levels (43.6 DNL and 43.8 DNL respectively). If we assume that these estimates are reasonable, the predicted increase in noise levels would probably be considered negligible.

We have two concerns about this approach; first the existing noise level of approximately 42 decibels for flights over the park seems high versus the background noise levels for a natural/protected area such as in Everglades National Park. I base this on a review of table 4.2.2-10 in the EA, which is referred to as FAA compatible land use guidelines. The table suggests that noise levels of 25-30 decibels are in the range that is considered more compatible with residential areas and recreational areas. Our second issue is that even if the noise level per aircraft flight is the same, the number of flights over the park would likely be increasing substantially.

Viewshed and Lightshed

ENP third and fourth comments are F-2C&D (page 181). Our concerns here continue to be tied to an increase in the number of flights and more flights with larger planes that would diminish natural lightscapes and increase visual impacts that would diminish the viewscope for visitors.

The draft EA stated that these concerns were not significant because there would be no increase in the number of aircraft arriving or departing TMB (apparently not a correct statement). Based on the maps showing the primary flight corridors for existing aircraft, there would likely be a significant increase in air traffic around the Checkika area of the Park, as well as the commercial airboat areas along the eastern portion of Tamiami Trail. In addition, the draft EA states that general aviation night operations would increase, during hours when the air traffic control tower is currently closed (EA page 5-3). This could potentially impact the lightscape (or night sky) if we have night visitors in the Checkika area.

Impacts to Birds & Threatened and Endangered Species

ENP fifth and sixth comments are F-2E&F (page 182). Our concerns here continue to be tied to an increase in the number of flights and more flights with larger planes that would potentially impact bird behavior or affect threatened and endangered species.

Our primary concern here is with wading bird nesting sites that are in the immediate areas of the primary flight corridors for TMB. The attached map shows the distribution of wading bird nesting sites observed during the wet and dry season EVER/SRF (systematic reconnaissance flight) wading bird surveys for 2006. Note that there are a considerable number of wading bird nesting sites that appear to be within or adjacent to the east and west flow primary flight corridors described in the Draft EA (see Figures 4.3 and 4.4). Of particular concern are three Wood Stork nesting sites located in the corner of Northeast Shark Slough (Tamiami East-1, Tamiami East-2, Tamiami West). These sites appear to be located directly in the departure corridor for the west flow pattern (Figure 4-4) and arrival/departure corridors for the east flow pattern (Figure 4-3). These same sites had noise restrictions during the S-355 construction period that were developed by the FWS.

There are numerous other Wood Stork nesting sites inside the core foraging area identified by the FWS (cited by the FWS in their draft EA comments). We are continuing to work with the FWS on these threatened and endangered species issues.

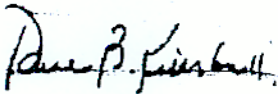
Public Health and Safety & Conflicts with Park Operations

Our final concerns are F-2G&H (page 182). Our concerns here continue to be tied to an increase in the number of flights and more flights with larger planes that would potentially impact public health and safety (F-2G) and interfere with park overflights (F-2H).

Again the draft EA response states that there will be no increase in the number of flights so these are not issues of concern.

Please contact Linda Friar (305-242-7714) if you have any questions with regard to these comments. We would be happy to meet with you to discuss these comments in more detail.

Sincerely,



Dan B. Kimball
Superintendent

cc: Patricia Hooks, Director, Southeast Region, National Park Service



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

September 26, 2006

RECEIVED

OCT 03 2006

NOISE
ABATEMENT

Mr. Jeffery R. Bunting
Division Director
Aircraft Noise & Environmental Planning
Miami-Dade Aviation Department
P.O. Box 025504
Miami, FL 33102-5504

**SUBJ: EPA NEPA Review of DEA for Kendall-Tamiami Executive Airport
(TMB) Runway Extension; Dade County, FL; August 2006 Draft**

Dear Mr. Bunting:

Consistent with Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the subject Draft Environmental Assessment (DEA) for the proposed expansion of TMB. As the Sponsor, the Miami-Dade Aviation Department (MDAD) has prepared this DEA subject to final review by the Federal Aviation Administration (FAA) before a Final EA (FEA) is prospectively approved as an FAA document.

The TMB airport presently is a General Aviation airport with no scheduled commercial service. It is located in the Kendall area some 13 miles southwest of the City of Miami. Its configuration consists of a southern East-West runway (9R-27L), a northern East-West runway (9L-27R) and a crosswind runway (13-31). TMB has a control tower that operates 7am to 9pm. The Sponsor's Proposed Project would extend Runway 9R-27L to a total of 7,350 ft by adding runway portions to both the east end (550-ft extension) and west end (1,798-ft extension) on existing airport property. This proposed project is included on the TMB Airport Layout Plan. The project design years used for the DEA are 2009 (base) and 2015 (future or out).

The purpose of the proposed TMB expansion is to "...provide sufficient runway length to allow aircraft to conduct non-stop operations to medium- and long-haul destinations from TMB without imposing weight restrictions that result in limiting certain business jet aircrafts from operating at the Airport" as well as providing "...sufficient runway length required to allow TMB to fulfill its role as a designated reliever to Miami International Airport [MIA] and provide an additional measure of safety for all aircraft operations" (pg. 3-3).

In general, if expansions for reliever airports to MIA are implemented in an environmentally acceptable manner and if the need for such actions is justified, EPA would generally support them (on a case-by-case basis) since MIA is a congested airport

with a large surrounding population that would be further exposed to noise and other impacts by additional MIA expansion. Nevertheless, EPA considers the proposed runway expansion to TMB substantive since it would total 2,348 feet of new runway and generate a 7,350 ft runway for the action alternatives carried forward for analysis.

* Alternatives – In addition to the No-Action Alternative (Alt. 1), several action alternatives on airport property were considered:

- + *Alternative 2* – Proposes to extend southern Runway 9R-27L at both the east and west ends totaling 2,348 ft, as described above.
- + *Alternative 3* – Proposes to add the same total runway length (2,348 ft) to southern Runway 9R-27L, but only to the west end.
- + *Alternative 4* – Proposes to add essentially the same total runway length (2,349 ft) to northern Runway 9L-27R at both the east end (750 ft) and the west end (1,599 ft).
- + *Alternative 5* – Proposes to add 3,349 ft to crosswind Runway 13-31 at both ends (1,674 ft at southeast and 1,675 at northwest).

Action Alternatives 2 and 3 were carried forward for analysis along with the No-Action Alternative (1). Alternatives 4 and 5 were not carried forward due to considerably higher costs. Alternative 2 was selected by the Sponsor as its Proposed Project.

We offer the following comments as well as the enclosed *Additional Comments* on the DEA for FAA's consideration in the development of their FEA:

* Air Quality

+ *Level of Operations* – The DEA does not address how flight operations and passenger enplanements would be affected by the different alternatives for the runway extension for the base and future years. The current and future expected levels of aircraft operations and passenger enplanements were not presented, but should be in the FEA. Increases in operations would change the total emissions associated with the airport when the aircraft, ground support equipment, passenger automobiles, truck traffic serving the airport, and airport facility emissions are cumulatively considered.

+ *Regional Emission Inventory* – Page 4-18 states that no regional emission inventories for carbon monoxide (CO), nitrogen oxides (NO_x) and volatile organic compounds (VOCs) have been developed for the last 15 years. Emission inventory data for these pollutants have been recently developed and are currently re-assessed as a part of modeling that is being developed for compliance with the Regional Haze rule. These emission data, plus sulfur dioxides (SO₂) and particulates (PM₁₀ and PM_{2.5}) are available for the majority of the United States. Consultation with the Florida Environmental Protection Department (FL DEP) is recommended.

+ *NAAQS* – The discussion on existing air quality does not address how air quality will remain within EPA National Ambient Air Quality Standards (NAAQS) for

the pollutants being emitted from the airport. It appears that only ozone was considered. The FEA should address other relevant NAAQS.

+ **VISTAS** – There are no *de minimis* levels of emissions for determining if air quality will be adversely impacted (pg. 5-21). While there are General Conformity threshold values that are used to determine when a conformity determination is needed, we recommend that emissions for the pollutants emitted from the airport be compared to the 2002 emissions as contained in the Visibility Improvement – State and Tribal Association for the Southeast (VISTAS) emissions inventory. Mr. Tom Rogers of FL DEP should be contacted for more information on this inventory. Modeling with the EDMS model would provide the best information on air quality impacts.

+ **Other Airport Emission Sources** – Only aircraft emissions were estimated. It is unclear why emissions from other sources of airport emissions were not estimated (e.g., fuel storage tanks, ground support equipment, ground access vehicles, stationary sources, other construction activities). The FEA should discuss these.

* **Noise** – Noise information for 2009 and 2015 was provided for Alternatives 1-3 carried forward for analysis. The threshold used for significant additional noise exposure in the 65 DNL due to the proposed project was an increase of +1.5 DNL or greater, which is consistent with the Federal Interagency Committee on Noise (FICON). Because no residences/residents reportedly exist in the 65 DNL contour area, there would be no residential exposure to any incremental increases. This should be verified and stated in the FEA. Even though there appear to be no residences in the 65 DNL and incremental increases are less than +1.5 DNL, some incremental data should be provided as reference in an appendix, or summarized in the main document. We also recommend that a summary table for the noise information already provided in the DEA be consolidated in the FEA by project year (e.g., number of operations, etc. for 2009 and 2015) to facilitate comparison of alternatives at the end of the section.

* **Induced Impacts** – Given the level of runway extension proposed (approx. 2,350 ft), TBM could become more attractive to general aviation (including corporate jets) and possibly some commercial carrier interests. The FEA should indicate if the ARC designation of the airport would change with the extension and if additional plans for on-airport expansion are planned or are foreseeable (terminal building, full time control tower, hangars, road access, etc.). It appears that there is enough room for expansion at the TMB site to allow the regional airport to grow into what could be a fairly large, if not major, airport. As a MIA reliever, does TBM have the potential to become a larger airport or even potentially a Fort Lauderdale (FLL) type airport since MIA is apparently near capacity?

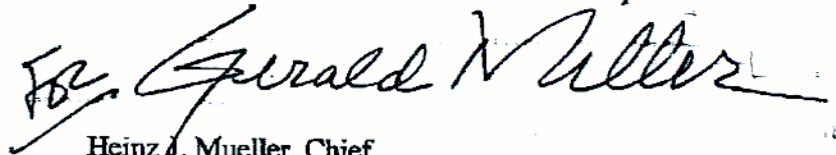
In addition, would the TBM expansion induce additional off-airport support facilities and secondary development? The FEA should reasonably address how induced secondary growth in the surrounding area (businesses, shopping, residential areas, on-road mobile sources, roads, terminal improvements, hangar needs, etc.) would be affected by any project changes to flight operations, passenger enplanements and the aircraft fleet mix.

We recommend that zoning ordinances help ensure that the 65 DNL contours remain compatible with airports (i.e., no residences) for the proposed and any future expansions.

In summary, the Proposed Project would substantively expand the existing TMB by adding 2,348 ft of runway to create a total runway length of 7,350 ft. While we understand such an expansion would help relieve MIA, it would accordingly result in increased operations and enplanements, as well as accommodating larger aircraft such as corporate jets. Such changes would affect regional noise and air quality. The FEA should therefore further discuss such potential changes and impacts as well as the potential for TMB becoming a future significant reliever airport to MIA, given MIA's current congestion and expansion constraints. At this time, however, we are pleased to note that the current proposal would not affect any residences within the 65 DNL or require relocation for construction. Nonetheless, the FEA should reasonably discuss the Proposed Project's potential for inducing secondary development that would not occur but for the project or that would utilize the airport if expanded. We recommend that zoning ordinances help ensure that the 65 DNL contours remain compatible with airports for the proposed and any future expansions.

We appreciate the opportunity to provide these early comments on the DEA. Should you have questions on our comments, please call Chris Hoberg at 404/562-9619 or hoberg.chris@epa.gov of my staff.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosure - *Additional Comments*
cc: Virginia Lane - FAA Orlando, FL

ADDITIONAL COMMENTS

* Purpose & Need – Although we principally defer to FAA regarding project need, we offer the following:

+ Other Reliever Airports – The purpose of the proposed action (pg. 2-2) states that the runway extension is needed to fulfill the airport's role as a designated reliever airport as defined in the 2005 National Plan of Integrated Airport Systems. The FEA should document all other airports that are close to the MIA and discuss if any of those airports could (or discuss why not) be used as a reliever airport.

+ MIA Congestion – The FEA should document the level of congestion at MIA that requires TMB to be used as an airport reliever.

+ Fleet Mix – It is unclear if some commercial passenger jets that normally land at MIA could use TMB (after the proposed implementation of the expanded runway).

* Alternatives

+ Relocation of SW 157th Avenue – Page 3-5 states that “[t]he proposed north-south realignment of Southwest 157th Avenue has been established and no further adjustments to the realignment can be made for the purposes of accommodating additional runway length on the west end of Runway 9R-27L.” However, Figure 3-1 (Alt. 2) shows that SW 157th Avenue would be relocated to accommodate the future Runway Protection Zone (RPZ). We also note that page 3-8 states that “Alternative 2 would not require rerouting or relocation of any public roads.” It is unclear if this realignment has occurred, is approved, or is still only proposed as part of the Proposed Project. We note that page 3-5 refers to this roadway realignment as “proposed”. However, if the relocation has already occurred or been approved, the FEA should discuss under what NEPA documentation it was realigned and include any impacts under the cumulative impacts section. (Note – Transportation conformity requirements for the realignment are not relevant in this case since Dade County is not an air quality nonattainment area).

+ RPZ's – We note that all proposed runway extensions (Alts 2-5) would be on TMB airport property. However, several future RPZ's associated with these runway extensions would apparently extend off-airport. The FEA should discuss if this is consistent with FAA guidance.

+ Alternative 4 Extensions – For Alternative 4 described on page 3-2, it is unclear if the total runway length was intended to be 2,348 ft (Alts. 2&3), or for 2,349 ft, which is the sum of the 750 ft and 1,599 ft referenced on page 3-2 (Alt. 4). For consistency, the FEA should verify the lengths and additions.

+ *Alternative 4 vs. 2* – The DEA states (pg. 3-10): “With the majority of operations occurring on runway 9L-27R under Alternative 4, aircraft would be operating much closer to the adjacent densely populated residential developments and other incompatible land uses.” This is depicted on Figure 3-3. We note that Alternative 2, which expands Runway 9R-27L, would also be close to other populated areas as depicted on Figure 3-1.

* Air Quality

+ *Conformity* – A conformity determination is not required for this Proposed Project because the area has been designated attainment. When an area is redesignated, it becomes a maintenance area and conformity should be addressed. The Miami area was redesignated to attainment and a maintenance area for the 1-hour ozone NAAQS. But the 1-hour NAAQS is no longer a requirement for the Miami area since that NAAQS was revoked. The FEA should document this designation information.

+ *Air Toxics* – The DEA does not address the potential for impacts from air toxics associated with the project. Air toxics exposures to the public are an important aspect of the potential air quality impacts associated with airport projects, and they should be reasonably addressed in the FEA.

+ *Diesel Retrofits* – Page 5-22 provides the types of construction equipment that would be used for the proposed project. We suggest that diesel powered equipment use ultra-low diesel fuel or that construction equipment be diesel retrofits to reduce construction emissions. FAA may wish to offer an incentive for contractors to specify the use of such fuel or equipment in their bids. For further information on diesel retrofits, please contact EPA’s Dale Aspy at 404/562-9041.

* Noise – The noise conclusions drawn in the DEA are confusing. For example, for Alternative 1, page 5-6 states that: “No noise-sensitive land uses are within the 65 DNL noise contour for Alternative 1 in 2009” and “therefore, there are noise impacts as a result of Alternative 1.” Similar language was used for Alternative 1 for 2015 (pg. 5-10) and for Alternative 2 for both 2009 (pg. 5-10) and 2015 (pg. 5-17). These conclusions should be revisited in the FEA. It appears (assuming that “noise sensitive land-uses” include residences) that what may have been intended was that “therefore, even though there are incremental noise impacts attributable to the project (although not significant), there are no noise exposures as a result of Alternative 1 (or 2) since there are no residents living within the 65 DNL contour.”

* Public Review – We appreciate that this DEA is also available on the Miami Airport website (www.miami-airport.com) for greater public circulation.

* Acronyms – For the benefit of the public, we suggest that a List of Acronyms be provided in the front of the FEA and include terms such as MDAD, DERM, SHPO, FDEP and SFWMD, as well as technical acronyms such as SWMP, NPDES, RCRA, CERCLA, etc.

* SFWMD Permit – The DEA states (pg. 4-15): “From a regulatory context, the South Florida Water Management District (SFWMD) has issued a Conceptual Surface Water Management Permit to TBM (permit No 13-00938-S, dated October 1996).” The FEA should include the date this permit expires.

* Stormwater Plan – The DEA states (pg. 4-16): “MDAD completed a comprehensive stormwater master plan (SWMP) in December 1994...” EPA recommends MDAD review and if necessary update the SWMP to insure that it complies with present local, state and federal rules, regulations and guidelines since it is a somewhat dated plan (1994). The Plan should also include the maintenance of erosion control measures (e.g., silt fences emptied and hay bales replaced).

* Hazardous Materials – In addition to the detailed hazardous waste handling procedures outlined in the DEA (pg. 4-18), EPA recommends MDAD ensure the solid waste debris, solid wastes, chemicals and hazardous materials be properly handled by licensed contractors and disposed in licensed sanitary landfills according to the type of waste, and that chemicals and hazardous material be disposed of according to local, state, Federal and Clean Water Act (including RCRA and CERCLA) rules, regulations, guidelines and requirements.

* Historic and Cultural Resources – Although no adverse cultural effects appear to exist for the Proposed Project, EPA recommends MDAD continue to work with NHPA, FLSHPO, ACHP and American Indian Tribes/organizations in the event archaeological, cultural and burials are located during future ground-disturbing activities.

* Environmental Justice (EJ) – Page 5-18 indicates that no residential areas or schools would be exposed within the 65 DNL contours and that no relocations would be required for the Proposed Project. The DEA therefore concludes that there will be no disproportionate impacts to minorities and low-income populations. While this seems reasonable, it should be noted that noise is only one impact associated with airports (air quality is another) and that airport noise and air impacts also occur outside the 65 DNL contour.

Ordinarily, the EJ analysis would include documentation of demographics using 2000 U.S. Census data for block groups (BGs) associated with the airport. These data are used to determine the percentage of minorities and/or low-income groups within the BGs, with comparisons against county and state percentages to determine any disproportionate project impacts.

* Floodplains – Figure 4-9 identifies two Flood Hazard Zones, AH and X. A definition was given for Zone AH (pg. 4-16) but no definition was given for Hazard Zone X. The FEA should also provide a definition for “Hazard Zone X”.

* Wetlands – On page 5-33, the DEA states: “A field survey revealed that the only wetlands present in the area of construction at the Airport are associated with Canal C-1 and the drainage ditch of Runway 9R-27L. Both of these canals would not be affected”

by the propose runway extension. Since there would be no impact to wetlands, no mitigation would be required." If not already included in the Affected Environment chapter, EPA suggests that the FEA provide the wetlands acreage in these two areas.

*** Aircraft-Wildlife Strikes** – We strongly recommend continued coordination with FAA to minimize potential aircraft-wildlife conflicts. We note that burrowing owls and alligators in nearby canals are examples of local wildlife that could be problematic for runway or airborne collisions. Others could be deer, raccoons and various birds found in Florida. If not already the case, we suggest that the airport be fenced and that all potential onsite wildlife attractants be avoided (ponds, roosts, vegetation, etc.) or neutralized (e.g., stormwater ponds covered with mesh). The FEA should address this after coordination with FAA.

*** Cumulative Impacts** – We appreciate that cumulative impacts were considered (pg. 5-48). We particularly note the list of potential on-airport projects, based on the airport layout plan (pg. 5-49). However, the analysis for off-airport facilities seems to be limited to projects proposed during the timeframe of the Proposed Project. The FEA should also reasonably include off-airport projects that are ongoing (existing) or proposed, particularly those that would have similar impacts to common local resources such as wetlands, waterbodies, airsheds, uplands (e.g., land clearing) within the project area. Such areas should be reasonably listed with impacts provided. The goal of the cumulative impacts section is to determine what overall impacts the proposed project – together with ongoing and reasonably foreseeable projects – would collectively have on the same resources in the setting proposed.

As previously noted and specific to air quality cumulative effects, only aircraft emissions were estimated in the DEA. The FEA should also provide potential sources of other on-airport emissions such as fuel storage tanks, ground support equipment, ground access vehicles, stationary sources and other construction activities.

Received via e-mail

-----Original Message-----

From: John_Wrublik@fws.gov [mailto:John_Wrublik@fws.gov]

Sent: Wednesday, August 16, 2006 11:49 AM

To: Jeffrey R. Bunting

Subject: Kendall-Tamiami Executive Airport Runway Expansion August 16, 2006

Mr. Jeffrey Bunting
Miami-Dade Aviation Department
Post Office Box 592075
Miami, Florida 33159

Service Federal Activity No.: 41420-2006-FA-0542

Date Received: March 31, 2006

Project: Kendall-Tamiami Executive Airport Runway Expansion
County: Miami-Dade

Dear Mr. Bunting:

Thank you for your letter dated August 7, 2006, and draft Environmental Assessment (DEA) for the project referenced above. The Fish and Wildlife Service (Service) has reviewed the DEA and have no further comments to offer at this time. As you know, the Service has already provided comments on the proposed project in an email message to you dated April 12, 2006.

Thank you for the opportunity to comment. If you have any questions, please contact me at 772-562-3909, extension 282.

Sincerely yours,

John M. Wrublik
U.S. Fish and Wildlife Service
Vero Beach Ecological Services Office
1339 20th Street
Vero Beach, Florida 32960
Phone: 772-562-3909, x-282
Fax: 772-562-4288

PUBLIC COMMENTS ON DRAFT EA
Kendall-Tamiami Airport Runway Extension EA

<u>Name</u>	<u>Source of Comment</u>	<u>Comment No.</u>
M. McGrath	Mail	P-1
D. Scofield	Mail	P-2
J. Palmer	Public Hearing Comment Form	P-3
E. Maestre	Public Hearing Comment Form	P-4
W. Ibarra	Commented Verbally at Public Hearing	P-5
D. Moore	Commented Verbally at Public Hearing	P-6
A. Sotero	Commented Verbally at Public Hearing	P-7
L. Leech	Commented Verbally at Public Hearing	P-8
M Cervera	Commented Verbally at Public Hearing	P-9
L. Percival	Commented Verbally at Public Hearing	P-10

M. McGrath Mail P-1

Comment P-1- The commenter identified that the proposed "mitigation" activities in the Draft EA merely serve to prevent direct killing of the burrowing owls and that by not providing off-site habitat enhancement, the birds will be killed all the same.

Response P-1 – As stated in the Draft EA, Miami-Dade County shall implement a burrowing owl management plan to ensure that no active burrowing owl burrows are damaged during construction and that no owls, eggs, or flightless young are injured during burrow collapse activities. The burrowing owl management plan shall include the following procedures:

- No disturbance of an active burrowing owl burrow would occur between February 15th and July 10th.
- All burrowing owl burrows shall be monitored prior to commencement of construction activities to ensure that no eggs or flightless young are affected. Burrows that are considered too damaged to house owls shall be deemed inactive. Burrows that could be active shall be investigated by terrestrial and/or subterranean (underground camera) observation methods prior to construction activities.
- If a burrowing owl burrow is active and occupied by eggs or flightless young, the burrow shall not be collapsed until the owls have fledged. Burrows shall be collapsed only by hand shovel after the ecologist has ensured that the burrow is inactive.

- In accordance with FWC recommendations and FAA guidelines, no on-Airport burrowing owl habitat enhancement activities, such as artificial nest construction, t-perch installation, or habitat management practices, shall be conducted.

Suitable habit exists in the surrounding area for the owls.

D. Scofield Mail P-2

Comment P-2- The commenter identified that the proposed "mitigation" activities in the Draft EA merely serve to prevent direct killing of the burrowing owls and that by not providing off-site habitat enhancement, the birds will be killed all the same.

Response P-2 – As stated in the Draft EA, Miami-Dade County shall implement a burrowing owl management plan to ensure that no active burrowing owl burrows are damaged during construction and that no owls, eggs, or flightless young are injured during burrow collapse activities. The burrowing owl management plan shall include the following procedures:

- No disturbance of an active burrowing owl burrow would occur between February 15th and July 10th.
- All burrowing owl burrows shall be monitored prior to commencement of construction activities to ensure that no eggs or flightless young are affected. Burrows that are considered too damaged to house owls shall be deemed inactive. Burrows that could be active shall be investigated by terrestrial and/or subterranean (underground camera) observation methods prior to construction activities.
- If a burrowing owl burrow is active and occupied by eggs or flightless young, the burrow shall not be collapsed until the owls have fledged. Burrows shall be collapsed only by hand shovel after the ecologist has ensured that the burrow is inactive.
- In accordance with FWC recommendations and FAA guidelines, no on-Airport burrowing owl habitat enhancement activities, such as artificial nest construction, t-perch installation, or habitat management practices, shall be conducted.

Suitable habit exists in the surrounding area for the owls.

J. Palmer Public Hearing Comment Form P-3

Comment P-3- Concerned about the burrowing owls, increases in size of aircraft, noise and lower property values as a result of the proposed action.

Response P-3 – See responses to comments P-1 and P-2 related to the burrowing owls. The Draft EA indicated that noise exposure would be reduced slightly east of the airport an increase slightly west of the airport (over undeveloped property) and that no significant noise impacts would result from the proposed action based on the federal criteria. Property values are not expected to change as a result of the proposed action.

E. Maestre Public Hearing Comment Form P-4

Comment P-4- Supports the proposed action and feels that it will create more business and more jobs.

Response P-4 – The commenter’s opinion is acknowledged and no further response is warranted.

W. Ibarra **Commented Verbally at Public Hearing** **P-5**

Comment P-5- Supports the proposed action and feels that it will benefit local businesses.

Response P-5 – The commenter’s opinion is acknowledged and no further response is warranted.

D. Moore **Commented Verbally at Public Hearing** **P-6**

Comment P-6- Supports the proposed action and feels that it will improve safety.

Response P-6 – The commenter’s opinion is acknowledged and no further response is warranted.

A. Sotero **Commented Verbally at Public Hearing** **P-7**

Comment P-7- Supports the proposed action and is needed to accommodate longer non-stop destinations as requested.

Response P-7 – The commenter’s opinion is acknowledged and no further response is warranted.

L. Leech **Commented Verbally at Public Hearing** **P-8**

Comment P-8- Supports the proposed action and feels that it will improve safety.

Response P-8 – The commenter’s opinion is acknowledged and no further response is warranted.

M. Cervera **Commented Verbally at Public Hearing** **P-9**

Comment P-9- Supports the proposed action and feels that it will benefit local businesses.

Response P-9 – The commenter’s opinion is acknowledged and no further response is warranted.

L. Percival **Commented Verbally at Public Hearing** **P-10**

Comment P-10- Supports the proposed action with the understanding that the airport will continue to serve as a general aviation airport and not a commercial airport.

Response P-10 – The Miami-Dade County CDMP identifies TMB as a reliever to Miami International Airport, which means that its use is for general aviation aircraft. It is not the intent of Miami-Dade County to use TMB as a commercial service airport.

STATE OF FLORIDA AGENCY COMMENTS ON DRAFT EA

Kendall-Tamiami Airport Runway Extension EA

<u>Name</u>	<u>Agency</u>	<u>Letter No.</u>
F. Gaske	Division of Historic Resources State Historic Preservation Officer	S-1
S. Mann	Department of Environmental Protection	S-2
P.A. Wierzbicki	Department of Environmental Protection	S-3
No Name	Florida Department of Transportation	S-4

STATE AGENCY CLEARINGHOUSE COMMENTS AND RESPONSES

F. Gaske **Division of Historic Resources S-1**
State Historic Preservation
Officer

Comment S-1 – The **Florida Department of State, Division of Historic Resources, State Historic Preservation Officer** indicated that based on the information in the Draft EA, the office concurs with the findings that the proposed action would have no effect on cultural resources listed or eligible for listing in the National Register of Historic Places and that the submitted report is complete and sufficient in accordance with Chapter 1A-46, Florida Administrative Code.

Response S-1 – Comment noted.

S. Mann **Department of Environmental** **S-2**
Protection

Comment S-2 – The **Florida Department of Environmental Protection** indicated the state has determined that, at this stage, the proposed federal action is consistent with the Florida Coastal Management Program (FCMP). The concerns raised by the state's reviewing agencies must be addressed prior to project implementation.

Response S-2 – The response to the requested "concerns raised by the state's reviewing agencies" are included below as comments S-3A through S-3J.

P.A. Wierzbicki

**Department of Environmental
Protection**

S-3

Comment S-3A – The Florida Department of Environmental Protection indicated that Page 4-18 states that the approach end of Runway 27L was used for a year (between September 1992 and September 1993) as a hurricane debris staging and transfer station in the aftermath of Hurricane Andrew. The majority of the debris handled was vegetation clippings and building debris. Was any of this debris or ash buried on site? If so, a contamination assessment may be needed.

Response S-3A – No debris or ash was buried on site.

Comment S-3B – The Florida Department of Environmental Protection indicated that Page 4-18 states that hazardous material present at the airport include the following: aviation fuels, motor fuels, substances used to operate or maintain aircraft, ground vehicles, equipment and buildings, and various hazardous materials transported to and from the airport via ground vehicles and aircraft. In addition to aviation fuels, smaller quantities of other hazardous materials are stored and used at the airport by tenants including solvents, degreasers, cleaners, paints, paint thinners, diesel, welding gasses and pesticides in support to aircraft, ground vehicle and building and grounds maintenance operations. M-DAD should maintain a list of hazardous material handlers, names, addresses and telephone numbers of contact persons, types, locations and quantities of hazardous materials handled, etc. for contingency planning in the event of a fire, spill, environmental release or storm event. If any of these handling areas are located in an area affected by one of the alternatives during construction, contamination screening evaluations should be conducted prior to construction.

Response S-3B – None of the handling areas are located within the limits of the proposed project construction.

Comment S-3C – The Florida Department of Environmental Protection indicated that Page 4-19 states that there are approximately 100,000 gallons of fuel stored in six above ground tanks storing Avgas, Jet A fuel and other fuels. Also, the report states that there are two 10,000-gallon underground tanks in operation at this airport and used to store Avgas at Buildings 114 and 221. Further, the report states that nine tenants conduct aircraft maintenance and 10 conduct fueling operations. A listing of these facilities with addresses, phone numbers and contact persons, Facility Identification numbers, etc., along with maps showing these locations should be included for contingency planning. A brief review of the Department's storage tank registration data base appears to show some discrepancies and will require some clarification and updating from M-DAD. Some Facility IDENTIFICATION Numbers that appear to be at this airport are: 138506190, 139600736, 139601695 (FAA), 139700942, 139600736 (FAA). I could not locate an identification number for the six above ground tanks mentioned in the DRI.

Response S-3C – The attached Table S-3C-1, identifies the storage tanks located on the Tamiami Airport including the FDEP FAC ID, location, contact, whether the tank is above or below ground, tank volume and type of fuel. It also identifies tanks that have been removed from the site. None of the tanks are located within the limits of the proposed project construction. In addition, the tanks identified in the comment are the following: #138506190 is for the facility at building #490 and all the tanks have been removed from the site; #139600736 is the tank owned by the Miami-Dade Aviation Department (MDAD) for the emergency generator at building #510 (aka511); #139601695 is an FAA tank; and #139700942 is the MDAD Vehicle Fueling Facility by building 508.

In addition, the following tenants have IW permits issued by DERM

- * Peninsula Avionics IW Permit #004003
- * International Flight Center IW Permit # 002097
- * Reliance Aviation IW Permit #000446
- * FalconTrust Air LLC IW Permit #000507

Tamiami Airport (TMB) Storage Tanks

FACILITY	FDEP FAC ID	Facility Name/Owner	LOCATION	FACILITY Contact/ #s	AST/UST	VOLUME	FUEL
Tenants	8628925	Air Sal Inc.	14005 SW 127 St., Miami, FL 33186	R. Deliere (305) 251-1982	AST	12000	AvGas
	9046027	Peninsula Avionics	14229 SW 127 St., Miami, FL 33186	D. Blanchard (305) 238-6550	UST	10000	AvGas
	8628941	International Flight Ctr. Inc.	14592 SW 129 St. Miami, FL 33186	R. Morales (305) 238-8122	UST	12000	AvGas
					AST	5000	Jet Fuel
					AST	5000	Jet Fuel
	8506186	Reliance Aviation	14532 SW 129 St., Miami, FL 33186	Curtis George	AST	15000	AvGas
					AST	15000	Jet Fuel
	9807041	FalconTrust Air Llc	14150 SW 129 St., Miami, FL 33186	A. Sotero (305) 871-3105	AST	12000	AvGas
					AST	12000	Jet Fuel
					AST	12000	Jet Fuel
FAA	8628884	FAA	14301 SW 128 St., Miami, FL 33186				
	9601695	FAA	N/A				
	9803530	FAA	19200 SW 128 St., Miami, FL 33186				
MDAD	8506190	Building 490	12800 SW 137 Ave., Miami, FL 33186	P. Hernandez (305) 876-7928			Tanks removed from site
	9600736	Bldg.510 Emergency Gen.	12800 SW 137 Ave., Miami, FL 33186	P. Hernandez (305) 876-7928	AST	2000	Diesel
	9700942	Bldg.508 (Vehicle Fueling)	SW 127 St. & 145 Ave., Miami, FL 33186	P. Hernandez (305) 876-7928	AST	4000	Unleaded

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Comment S-3D Page 4-19, 5th paragraph states that “No known leaks from USTs at the airport have occurred. “However, some of the ID numbers referenced above appear to be associated with discharges. A complete listing of regulated storage tanks at the facility, along with cleanup status is also needed.

Response S-3D — Please see response S-3C

Comment S-3E - Groundwater monitoring wells may be present along and near the entire length of the project. Arrangements need to be made to properly abandon (in accordance with Chapter 62-532, Florida Administrative Code) and or replace any wells that may be destroyed or damaged during construction.

Response S-3E – No monitoring wells are located within the limits of the proposed project construction. Construction project at all MDAD facilities are closely coordinated with the Miami-Dade County Department of Environmental Management (DERM) and issues such as monitoring well relocations, dewatering permits and irrigation well replacements are evaluated, field verified and coordinated with them during design development and construction phases.

Comment S-3F - This project falls within the limits of the Biscayne Aquifer and this is a “sole source” aquifer in this part of Florida. There may be water production wells (irrigation, potable, industrial) in the vicinity of this project. The locations, types of wells, ownership information, etc. within a ¼ mile radius of the airport should be determined and included in the DRI. Will dewatering be required for the construction? Construction project segments involving “dewatering” should be discouraged or limited, since there is a potential to spread contamination to previously uncontaminated or less contaminated areas and affect contamination receptors, site workers and the public. Dewatering projects would require permits / approval from the South Florida Water Management District, Water Use Section and coordination with the Miami-Dade County Department of Environmental Resources Management.

Response S-3F – Construction project at all MDAD facilities are closely coordinated with DERM and issues such as monitoring well relocations, dewatering permits and irrigation well replacements are evaluated, field verified and coordinated with them during design development and construction phases.

Comment S-3G - In the event contamination is detected during construction, the Department and DERM need to be notified and project managers may need to address the problem through additional assessment and / or remediation activities.

Response S-3G – Comment noted.

Comment S-3H - Any land clearing or construction debris must be characterized for proper disposal. Potentially hazardous materials must be properly managed in accordance with Chapter 62-730, Florida Administrative Code (F.A.C.). In addition, any solid wastes or other non-hazardous debris must be managed in accordance with Chapter 62-701, F.A.C. Department rules and statutes are found on the DEP’s Internet Web site:
<http://www.dep.state.fl.us/legal/Default.htm>.

Response S-3H – Comment noted.

Comment S-3I - Please be advised that a new rule, 62-780, F.A.C., became effective on April 17, 2005. In addition, Chapters 62-770, 62-777, 62-782 and 62-785, F.A.C., were amended on April 17, 2005 to incorporate recent statutory changes. These rules may be found at the following website: <http://www.dep.state.fl.us/waste/>

Response S-3I – Comment noted.

Comment S-3J - Staging areas, with controlled access, should be planned in order to safely store raw material paints, adhesives, fuels, solvents, lubrication oils, etc. that will be used during construction. All containers need to be properly labeled. The project managers should consider

developing written construction Contingency Plans in the even of a natural disaster, spill, fire or environmental release for hazardous materials stored / handled for the project construction.

Response S-3J –Comment noted.

No Name

**Florida Department of
Transportation**

S-4

Comment S-4 – The Florida Department Transportation indicated that it appeared that no state road in the vicinity of the airport will be involved in this action. It did identify that SW 137th Ave becomes State Road 825 in the northeast quadrant of the airport and notes that the proposed eastern extension occurs in the southeastern quadrant of the airport.

Response S-4 – Comment noted.

FEDERAL AGENCY COMMENTS ON DRAFT EA

Kendall-Tamiami Airport Runway Extension EA

<u>Name</u>	<u>Agency</u>	<u>Letter No.</u>
Paul E Kruger	U.S. Army Corps of Engineers Jacksonville District Miami Regulatory Office	F-1
Dan B. Kimball	U.S. Department of the Interior National Park Service Everglades and Dry Tortugas National Parks	F-2
Heinz J. Mueller	U.S. Environmental Protection Agency (EPA) Region 4 Atlanta	F-3
John Wrublik	U.S. Fish and Wildlife Service Vero Beach Ecological Services Office	F-4

Paul E Kruger **U.S. Army Corps of Engineers**
Jacksonville District
Miami Regulatory Office

Comment F-1 - The **U.S. Army Corps of Engineers** indicated that based on the representations made in the DEA, the Corps at this time does not believe a federal Clean Water Act permit will be required.

Response F-1 - Comment noted.

D. Kimball **U.S. Department Of The Interior**
National Park Service
Everglades And Dry Tortugas National Parks

Comment F-2A- The **U.S. Department Of The Interior National Park Service** (NPS) expressed concern related to the change in aircraft activity and fleet mix at TMB. The NPS has indicated that one of their concerns is the increase in operational activity in 2010 and 2015 when compared to the baseline 2005 condition. The NPS has assumed this increase is due to the proposed runway extension.

Response F-2A -Per National Environmental Policy Act (NEPA) requirements, the sponsor must assess the potential environmental impacts resulting from the Proposed Action. This is accomplished by comparing the Propose Action to the No Action condition. In doing so it is important to note that the increases in aircraft operations cited in the Draft EA (DEA) and referenced throughout the NPS comments are projected to occur regardless of whether the runway is extended or not. No additional increase in aircraft operations is projected to result from the Proposed Action.

The NPS correctly indicated that the DEA projected a change in the fleet mix as a result of the Proposed Action when compared to the No Action condition. As stated on page 5-7 of the DEA, it is recognized that a 7,350-foot runway would make the airport more desirable to some jet operators. Jet aircraft have larger spacing requirements due to their higher approach speeds. This increased spacing generally results in a decrease in certain types of smaller GA turboprop/piston activity. Thus, the increase in jet aircraft activity forecast as a result of the Proposed Action was offset (from a total operations standpoint) by a corresponding decrease in turboprop/piston aircraft.

Overall, it is estimated that the extension would result in an average increase of 8 jet operations per day (4 arrivals and 4 departures) and a corresponding decrease in turboprop/piston aircraft activity. Since it is projected that a total of 568 operations per day would occur in 2009, the change in fleet mix would represent only 1.4 percent of the overall fleet.

Comment F-2B - This comment refers to noise impacts as a result of increased aircraft operations, direction of flow and flight corridors.

Response F-2B - As discussed in Comment 1, there is no change projected in total aircraft operations when comparing the Proposed Action and No Action condition. It is projected that there would be a 1.4% change in fleet mix and this change has been accounted for in the DEA's noise analysis. In addition, the DEA does not propose any changes in the flight corridors nor direction of flow from that which is presently occurring. As mentioned by the NPS, the DEA did indicate that aircraft arriving from the west be about 100 feet lower over the park than they are today and but would still generally be 1,500 feet or more over the park. It should also be noted that since departures would follow the same flight corridors, some aircraft would actually be higher over the park with the proposed runway extension. The amount each aircraft would be higher is dependent upon the individual aircraft's performance.

Comment F-2C - Natural Soundscapes. The NPS comment involves the noise exposure that occurred in 2005 compared to the noise exposure projected to occur in 2009 and 2015 with the proposed runway extension. The NPS identified that if the noise estimates in the DEA are reasonable, then the predicted increase in noise levels would probably be considered negligible. The NPS indicated that the FAA's compatible land use guidelines table suggests that 25-30 decibels are in the range of background noise in residential and recreation areas.

Response F-2C - The 25-30 decibels indicated in Table 4.2.2-10 refers to the amount of sound level reduction that should be incorporated into a residence to enable the interior noise level to be acceptable for indoor activities (not background levels in residential or recreation areas).

We concur with the NPS that the predicted noise level changes from 42.6 to 43.6 and to 43.8 that were identified in the DEA would be considered negligible.

Comment F-2D - Viewshed and Lightshed. The comments from the NPS related to viewshed and lightshed involve the increase in operations assumed by the NPS and the effects these increases in aircraft activity would have on the viewshed and lightsheds in the park.

Response F-2D - As indicated in previous responses, there is no predicted change in total aircraft operations and about a 1.4% change in fleet mix between the Proposed Action and No Action condition. Similarly, the increase in night flights results from the increased growth at the airport whether the runway extension were constructed or not.

Comment F-2E - Impacts to Birds & Threatened and Endangered Species. The comments refer to the potential impact to birds and T&E species that may result from the increase in aircraft activity at the airport.

Response F-2E - The response to this comment is similar to the previous responses. There is no change in total aircraft operations as a result of the Proposed Action and only change of 1.4% change in fleet mix. As stated in the DEA, the flight corridors being used by aircraft today would not change as a result of the Proposed Action. As indicated previously, the altitude of arriving aircraft west of the airport would be about 100 feet lower with the extension and the altitude of departures would be higher over the park with the Proposed Action.

Comment F-2F - Public Health and Safety & Conflicts with Park Operations. The comment also is based on an increase in aircraft activity resulting from the project.

Response F-2F - As indicated in previous responses the projected operational activity with or without the Runway extension would be the same in the future years 2009 and 2015.

Air Quality

Comment F-3 A - Level of Operations. The U. S. Environmental Protection Agency indicated that the DEA does not address how flight operations and passenger enplanements would be affected by the different alternatives for the runway extension. Increases in operations would change the total emissions associated with the airport when the aircraft, ground support equipment, passenger automobiles, truck traffic serving the airport are cumulatively considered.

Response F-3A - Based on the screening criteria identified in Chapter 3, only the No Action and Proposed Action were carried on for detailed environmental analysis. Aircraft operations for the existing, future No Action (Alternative 1) and the future Proposed Action (Alternative 2) are included in Chapters 4 and 5 of the DEA.

As noted in the DEA, the total number of airport operations is not expected to change as a result of the Proposed Action. A change in the fleet mix of aircraft is expected as a result of the Proposed Action. The study does indicate that approximately eight additional jet aircraft operations and eight less turboprop/piston aircraft operations would occur as a result of the Proposed Action (a change in about 1.4 percent of the aircraft fleet). No change to any other ground sources of air pollutants (passenger automobiles, truck traffic, fuel storage tanks, etc.) is expected as a result of the Proposed Action. Thus, with the exception of the change in aircraft fleet mix (and associated aircraft ground support vehicles) and the added taxi distance (both of which were analyzed in the DEA), there would be virtually no difference in emissions between the No Action and Proposed Action conditions. The analysis also demonstrates that the changes as a result of the Proposed Action will have a negligible effect on total regional emissions.

Comment F-3B - Regional Emissions Inventory. Emission inventory for pollutants have recently been developed and are currently re-assessed as part of the modeling that is being developed for compliance with the Regional Haze Rule. Consultation with the Florida Department of Environmental Protection is recommended.

Response F-3B - See response to comment F-3A regarding air quality and regional emissions.

Comment F-3C - NAAQS. The discussion on existing air quality does not address how air quality will remain within EPA NAAQS for the pollutants being emitted from the airport. It appears only ozone was considered. The FEA should address other relevant NAAQS.

Response F-3C - The DEA includes an analysis for Carbon Monoxide, Volatile Organic Compounds, Nitrogen Oxides, Sulfur Oxides, PM10 and PM2.5 (see pages 5-22 and 5-23)

for construction activities as well as the change in the aircraft fleet mix and additional taxiing distances as a result of the Proposed Action. As noted in the DEA, Miami-Dade County is currently in attainment for all of the NAAQS.

Comment F-3D - VISTAS. EPA recommends that emissions for the pollutants emitted from the airport be compared to the 2002 emissions as contained in the Visibility Improvement - State Tribal Association for the Southeast (VISTAS) emissions inventory. Modeling with the EDMS model would provide the best information on air quality impacts.

Response F-3D - The change in emissions as a result of the Proposed Action were modeled using the EDMS and are identified in the DEA. The analysis demonstrates that the changes in emissions as a result of the Proposed Action will have a negligible effect on total regional emissions.

Comment F-3E - Other Emission Sources. EPA states that it is unclear why emissions from other sources of airport emissions were not estimated (fuel storage tanks, ground support equipment, ground access vehicles, stationary sources, other construction activities).

Response F-3E - As stated on page 5-21 of the DEA, ground support equipment was included in the air quality modeling analysis. Additional sources such as ground access vehicles, fuel storage tanks, stationary sources, etc.) were not included because there is expected to be no change in these sources as a result of the Proposed Action.

Comment F-3F - Noise. EPA requested that some incremental data be provided in the appendix and that a summary table consolidating the data used in preparing the noise contours by project year be added to facilitate comparison of the alternatives.

Response F-3F - As stated in the DEA, no significant noise impacts will occur as a result of the Proposed Action. All tables in the noise section have been formatted consistently so that a reader can easily compare two tables.

Comment F-3G - Induced Impacts. EPA notes that the FEA should indicate if the ARC of the airport would change, and if additional plans for expansion are foreseeable (terminal building, full time control tower, etc.). EPA also raised the question if TMB would grow into a commercial service airport similar to FLL and to reasonably address how induced secondary growth in the surrounding area (businesses, shopping, residential areas, etc.) would change as a result of the Proposed Action.

Response F-3G - The airport is proposed to remain a general aviation reliever to MIA and is not being planned as a commercial service airport.

Figure 1-2, Airport Layout Plan identifies the proposed projects expected to occur over the next 20 years.

pages 5-47 through 5-50 address the Secondary (Induced) Impacts and Cumulative Impacts expected as a result of the Proposed Action. The Proposed Action would not result in a significant change in off-airport business, shopping, residences, or roads.

Comment F-3H - Zoning Ordinances. EPA recommends zoning ordinances help ensure that compatible land uses are within the 65 DNL contours for TMB.

Response F-3H - Comment noted.

ADDITIONAL EPA COMMENTS

Comment 1 *Other Reliever Airports* – The purpose of the Proposed Action (pg. 2-2) states that the runway extension is needed to fulfill the airport’s role as a designated reliever airport as defined in the 2005 National Plan of Integrated Airport Systems. The FEA should document all other airports that are close to the MIA and discuss if any of those airports could (or discuss why not) be used as a reliever airport.

Response 1 As stated on page 3-6 of the DEA, the only other general aviation airport in Miami-Dade County with a runway capable of serving the type of jet traffic currently using TMB is Opa-locka Executive Airport (OPF), which is 20 miles northeast of TMB. One of OPF’s runways has a length of more than 7,350 feet. The distance from Opa-locka to the city center of Miami is a few miles less than the distance from TMB to the city center of Miami but the travel time is much longer due to heavy surface traffic congestion. In addition, TMB is closer to many of the south Miami resorts as well as the residential areas of Coral Gables and Ocean Reef. Compared to OPF, this makes TMB more attractive to the users of corporate jets.

OPF also is a reliever airport to MIA and could help to fulfill the purpose of accommodating business jets requiring a 7,350-foot runway. However, TMB is where the demand exists for business jet aircraft and the demand at TMB is forecasted to increase for aircraft that require a longer runway. The use of OPF for these types of operations would not relieve the existing weight restrictions associated with the existing runway length at TMB. Additionally, the use of OPF would not result in enhanced safety benefits at TMB.

Comment 2 *MIA Congestion* – The FEA should document the level of congestion at MIA that requires TMB to be used as an airport reliever.

Response 2 As stated on page 1-2 of the DEA, TMB is currently classified in the National Plan of Integrated Airport Systems (NPIAS) as a reliever airport for Miami International. Two of the key reasons for designating TMB as a reliever airport are to reduce congestion at MIA and to enhance safety at MIA by

removing the smaller aircraft from the fleet mix. MIA is projected to continue to grow in the future in both air carrier passenger flights and cargo flights with a significant number of large wide-bodied aircraft.

Comment 3 *Fleet Mix* – It is unclear if some commercial passenger jets that normally land at MIA could use TMB (after the proposed implementation of the expanded runway).

Response 3 With the proposed extension, TMB will continue to serve its role as a general aviation reliever to MIA. Commercial passenger service is not in the plans for TMB.

Comment 4 *Relocation of SW 157th Avenue* – Page 3-5 states that “the proposed north south realignment of Southwest 157th Avenue has been established and no further adjustments to the realignment can be made for the purposes of accommodating additional runway length on the west end of Runway 9R-27L.” However, Figure 3-1 (Alt. 2) shows that SW 157th Avenue would be relocated to accommodate the future Runway Protection Zone (RPZ). We also note that page 3-8 states that “Alternative 2 would not require rerouting or relocation of any public roads.” It is unclear if this realignment has occurred, is approved, or is still only proposed as part of the Proposed Project. We note that page 3-5 refers to this roadway realignment as “proposed”. However, if the relocation has already occurred or been approved, the FEA should discuss under what NEPA documentation it was realigned and include any impacts under the cumulative impacts section. (Note – Transportation conformity requirements for the realignment are not relevant in this case since Dade County is not an air quality non-attainment area).

Response 4 The proposed realignment of SW 157th Avenue has been set by the County and no further adjustments to the alignment can be made for the purposes of accommodating additional runway length. The cumulative impact of locating the roadway around the extended runway would be the loss of farmland. Since no prime or unique farmland is designated, no significant impact would result. In addition, since no residences are located in proximity to the roadway, no community related impacts would result.

Comment 5 *RPZ's* – We note that all proposed runway extensions (Alts 2-5) would be on TMB airport property. However, several future RPZ's associated with these runway extensions would apparently extend off-airport. The FEA should discuss if this is consistent with FAA guidance.

Response 5 Some of the RPZ's for alternatives to the Proposed Action would extend beyond the Airport property limits. It is preferred, but not required, that RPZ's be within the Airport property limits and the uses within the RPZ's be limited to surface activities (open space, farming, roadways etc.). One of the

advantages of the Proposed Action is the ability to place, not only the runway extension, but the RPZ's on airport property as well.

- Comment 6 *Alternative 4 Extensions* – For Alternative 4 described on page 3-2, it is unclear if the total runway length was intended to be 2,348 ft (Alts. 2&3), or for 2,349 ft, which is the sum of the 750 ft and 1,599 ft referenced on page 3-2 (Alt. 4). For consistency, the FEA should verify the lengths and additions.
- Response 6 As presented in DEA, the total extension to Runway 9L-27R (Alternative 4) would be 2,349 feet (or one foot longer than Alternatives 2 and 3) because Runway 9L-27R is one foot shorter than Runway 9R-27L.
- Comment 7 Alternative 4 vs. 2 – The DEA states (pg. 3-10): “With the majority of operations occurring on runway 9L-27R under Alternative 4, aircraft would be operating much closer to the adjacent densely populated residential developments and other incompatible land uses”. This is depicted on Figure 3-3. We note that Alternative 2, which expands Runway 9R-27L, would also be close to other populated areas as depicted on Figure 3-1.
- Response 7 Comment noted.
- Comment 8 *Conformity* – A conformity determination is not required for this proposed project because the area has been designated attainment. When an area is redesignated, it becomes a maintenance area and conformity should be addressed. The Miami area was redesignated to attainment and a maintenance area for the 1 hour ozone NAAQS. But the 1-hour NAAQS is no longer a requirement for the Miami area since that NAAQS was revoked. The FEA should document this designated information.
- Response 8 Page 4-17 of the DEA, identifies that “Based on data collected in the Miami/Fort Lauderdale/West Palm Beach area prior to 1990, the EPA designated the Miami-Dade, Broward and Palm Beach counties as “moderate non-attainment” for the one hour ozone NAAQS. The section goes on to explain that these areas were re-designated to attainment.
- Comment 9 The DEA does not address the potential for impacts from air toxics associated with the project. Air toxics exposures to the public are an important aspect of the potential air quality impacts associated with airport projects, and they should be reasonably addressed in the FEA.
- Response 9 The DEA analyzed the changes in Volatile Organic Compounds (VOC's) as a result of the Proposed Action. Based on the analysis, the Proposed Action would increase VOC's by about one ton per year (see page 5-23). Air toxics referenced by the EPA are a subset of the VOC's analyzed in the DEA.

Comment 10 Diesel Retrofits – Page 5-22 provides the types of construction equipment that would be used for the proposed project. We suggest that diesel powered equipment use ultra-low diesel fuel or that construction equipment be diesel retrofits to reduce construction emissions. FAA may wish to offer an incentive for contractors to specify the use of such fuel or equipment in their bids. For further information on diesel retrofits, please contact EPA’s Dale Aspy at 404/562/9041.

Response 10 Comment noted.

Comment 11 Noise – The noise conclusions drawn in the DEA are confusing. For example, for Alternative 1, page 5-6 states that “No noise-sensitive land uses are within the 65 DNL noise contour for Alternative 1 in 2009” and “therefore, there are noise impacts as a result of Alternative 1”. Similar language was used for Alternative 1 for 2015 (pg. 5-10) and for Alternative 2 for both 2009 (pg. 5-10) and 2015 (pg. 5-17). These conclusions should be revisited in the FEA. It appears (assuming that “noise sensitive land-uses” include residences) that what may have intended was that “therefore, even though there are incremental noise impacts attributable to the project (although not significant), there are no noise exposures as a result of Alternative 1 (or 2) since there are no residents living within the 65 DNL contour.”

Response 11 The sentences referred to by the EPA on pages 5-6, 5-10 and 5-17 of the DEA included a "typo." The sentences will be changed in the FEA to read:
No noise-sensitive land uses are within the 65 DNL noise contour for Alternative 1 in 2009. Therefore, there are no significant noise impacts as a result of Alternative 1.

Comment 12 Public Review – We appreciate that this DEA is also available on the Miami Airport website (www.miami-airport.com) for greater public circulation.

Response 12 Comment noted.

Comment 13 Acronyms – For the benefit of the public, we suggest that a List of Acronyms be provided in the front of the FEA and include terms such as MDAD, DERM, SHPO, FDEP and SFWMD, as well as technical acronyms such as SWMP, NPDES, RCRA, CERCLA, etc.

Response 13 Those acronyms listed that have not been included in Section 9 Glossary of Terms will be added. A review of the report will also be made to determine if additional acronyms are in the text that need to be included in the glossary.

Comment 14 SFWMD Permit – The DEA states (pg. 4-15): “From a regulatory context, the South Florida Water Management District (SFWMD) has issues a Conceptual Surface Water Management Permit to TBM (permit No 13-00938-

S, dated October 1996).” The FEA should include the date this permit expires.

Response 14 MDAD maintains close coordination with SFWMD on all construction projects to ensure all necessary requirements and permits are met and adhered to. MDAD updates permits as required.

Comment 15 Stormwater Plan – The DEA states (pg. 4-16): “MDAD completed a comprehensive stormwater master plan (SWMP) in December 1994...” EPA recommends MDAD review and if necessary update the SWMP to insure that it complies with present local, state and federal rules, regulations and guidelines since it is a somewhat dated plan (1994). The Plan should also include the maintenance of erosion control measures (e.g., silt fences emptied and hay bales replaced).

Response 15 As stated on page 5-25 of the DEA, in June 2006, a technical memorandum was published to update the Stormwater Management Model (SWMM) that was prepared for MDAD as part of the 1994 SWMP so that the baseline land use conditions (as of March 2006) were accurately reflected. The study then updated the model further to reflect TMB’s 5-to 10-year development plan (as of March 2006) as shown in the “TMB 5-year to 10-year Future Land Use Plan.” This model version, referred to as the “future condition,” reflects changes to the Primary Stormwater Management System (PSMS) resulting from subsequent modifications to the land use plan, which includes the proposed extension of the runway.

Comment 16 Hazardous Materials – In addition to the detailed hazardous waste handling procedures outlined in the DEA (pg. 4-18), EPA recommends MDAD ensure the solid waste debris, solid wastes, chemicals and hazardous materials be properly handled by licensed contractors and disposed in licensed sanitary landfills according to the type of waste, and that chemicals and hazardous material be disposed of according to local, state, Federal and Clean Water Act (including RCRA and CERCLA) rules, regulations, guidelines and requirements.

Response 16 Comment noted.

Comment 17 Historic and Cultural Resources – Although no adverse cultural effects appear to exist for the Proposed Project, EPA recommends MDAD continue to work with NHPA, FLSHPO, ACHP and American Indian Tribes/organizations in the event archaeological, cultural and burials are located during the future ground – disturbing activities.

Response 17 Comment noted.

Comment 18 Environmental Justice (EJ) – Page 5-18 indicates that no residential areas or schools would be exposed within the 65 DNL contours and that no relocations would be required for the Proposed Project. The DEA therefore concludes that there will be no disproportionate impacts to minorities and low-income populations. While this seems reasonable, it should be noted that noise is only one impact associated with airports (air quality is another) and that airport noise and air impacts also occur outside the 65 DNL contour.

Ordinarily, the EJ analysis would include documentation of demographics using 2000 U.S. Census data for block groups (BG's) associated with the airport. These data are used to determine the percentage of minorities and/or low-income groups within the BGs, with comparisons against county and state percentages to determine any disproportionate project impacts.

Response 18 Comment noted.

Comment 19 Floodplains – Figure 4-9 identifies two Flood Hazard Zones, AH and X. A definition was given for Zone AH (pg. 4-16) but no definition was given for Hazard Zone X. The FEA should also provide a definition for “Hazard Zone X”.

Response 19 The FEA will include the following: Zone X is the flood insurance rate zone that corresponds to areas outside the 100-year floodplains, areas of 100 year sheet flow flooding where acreage depths are less than 1 foot, areas of 100-year stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 100-year flood by levees. No base flood elevations or depths are shown within this zone.

Comment 20 Wetlands – On page 5-33, the DEA states. “A field survey revealed that the only wetlands present in the area of construction at the Airport are associated with Canal C-1 and the drainage ditch of Runway 9R-27L. Both of these canals would not be affected by the propose runway extension. Since there would be no impact to wetlands, no mitigation would be required.” If not already included in the Affected Environment chapter, EPA suggests that the FEA provide the wetlands acreage in these two areas.

Response 20 The DEA includes the approximate acreages of these wetlands (open surface waters) in Appendix E - Page 4.

Comment 21 Aircraft – Wildlife Strikes – We strongly recommend continues coordination with FAA to minimize potential aircraft-wildlife conflicts. We note that burrowing owls and alligators in nearby canals are examples of local wildlife that could be problematic for runway or airborne collisions. Others could be deer, raccoons and various birds found in Florida. If not already the case, we suggest that the airport be fenced and that all potential onsite wildlife attractants be avoided (ponds, roosts, vegetation, etc.) or neutralized (e.g.,

stormwater ponds covered with mesh). The FEA should address this after coordination with FAA.

Response 21 Comment noted.

Comment 22 Cumulative Impacts – We appreciate that cumulative impacts were considered (pg. 5-48). We particularly note the list of potential on –airport projects; based on the airport layout plan (pg. 5-49). However, the analysis for off-airport facilities seems to be limited to projects proposed during the timeframe of the Proposed Project. The FEA should also reasonably include off –airport projects that are ongoing (existing) or proposed, particularly those that would have similar impacts to common local resources such as wetlands, waterbodies, airsheds, uplands (e.g., land clearing) within the project area. Such areas should be reasonably listed with impacts provided. The goal of the cumulative impacts section is to determine what overall impacts the proposed project – together with ongoing and reasonably foreseeable projects – would collectively have on the same resources in the setting proposed.

As previously noted and specific to air quality cumulative effects, only aircraft emissions were estimated in the DEA. The FEA should also provide potential sources of other on-airport emissions such as fuel storage tanks, ground support equipment, ground access vehicles, stationary sources and other construction activities.

Response 22 As stated in the DEA, the property north, east and south of the Airport is virtually built out. Little new (cumulative) development other than those projects identified in the DEA is expected to occur in the Airport area (see pages 5-49 and 5-50). Most of the land to the west of the Airport is undeveloped however, it is outside of the Miami-Dade County Urban Development Boundary which currently restricts development.

See response to EPA Comment 5 Other Emission Sources regarding air quality.

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Comment F-4 - The U.S. Fish and Wildlife Service reviewed the DEA and have no further comments to offer at this time.

Response F-4 - Comment noted.