

**DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
Supplemental Environmental Assessment Concourse and Gate Expansion Project
Nashville International Airport (BNA)
Nashville, TN**

Introduction and Background

In accordance with the National Environmental Policy Act (NEPA), this Finding of No Significant Impact (FONSI) announces final agency determinations and approvals for those Federal Actions by the Federal Aviation Administration (FAA) that are necessary to support the proposed development at the Nashville International Airport in Nashville, Tennessee.

July 28, 2021, the Federal Aviation Administration issued a FONSI for the Environmental Assessment Concourse and Gate Expansion. This decision approved the development and expansion of Concourse A to 16 gates. It also included construction of Concourse E (satellite) with eight gates, associated improved amenities, concessions, ticket lobby and baggage handling to enhance operational efficiency and the passenger experience. It also included expanded aircraft apron.

MNAA proposes modifications to the approved CAGE program at BNA to construct a 5-gate extension to the existing Concourse D building to provide sufficient service during the construction of Concourse A, in addition to, future service. Expansion of Concourse D was evaluated as an alternative in the earlier study. MNAA has prepared a Supplemental Environmental Assessment to evaluate the proposed modifications and ancillary projects and submitted it for approval in compliance with FAA Orders 1050.1F and 5050.4B. Both orders reference re-evaluation when there are new circumstances or information after a decision has been issued by FAA.

Proposed Federal Action

The federal actions are FAA funding assistance and Airport Layout Plan (ALP) approval for the proposed development in the Supplement which includes the following components:

- Construct Concourse D Extension of approximately 75,000 square feet serving five additional gates. Construction of approximately 265,000 square feet of aircraft apron and installation of hydrant fuel infrastructure at each aircraft parking position.
- Demolition of an air freight building and construction of an approximately 125,000 square-foot replacement facility. Demolition of approximately 150,000 square feet of landside pavement.
- Demolish Ancillary Airport Support Facilities (GSE fueling station, waste triturator, trash compactor and glycol storage and distribution facility to accommodate the aircraft gates for the

Concourse D extension. Demolition of approximately 75,000 square feet of pavement within the Air Operations Area (AOA).

- Improvements to existing airfield and landside area. Realign AOA fencing to encompass paved and developed areas. Reconfigure to support demolition and redevelopment.
- Improvements to the existing Multi-Purpose Facility.
- Use of an additional 35-acre site southwest of Runway 2C end for staging and storage of construction materials and equipment for the previously approved CAGE elements and the Concourse D extension.

Purpose and Need

The FAA has defined the purpose and need for implementing the proposed action as being necessary to accommodate existing and future passenger demand as well as future air carrier aircraft operations and parking. While accommodating demand, the improvements need to be consistent with existing airport infrastructure, promote efficient passenger throughput and enhance customer experience. The proposed improvements should also adhere to FAA design standards, found in FAA Advisory Circular 150/5300-13 and be consistent with Code of Federal Regulations (CFR) 14, Part 77, *Safe, Efficient Use and Preservation of Navigable Airspace*.

Alternatives

Federal guidelines require that all reasonable and practicable alternatives that might accomplish the objectives of a proposed project be identified and evaluated. Such an examination ensures that alternatives are not prematurely dismissed and may lead to consideration of alternatives that fulfill the project's purpose and need as well as enhance environmental quality and have less detrimental effect. All the previous alternatives evaluated in the Environmental Assessment for the CAGE project were reexamined. Only the alternative for extending Concourse D could meet the need for providing the additional gates to accommodate the increase in aircraft operations and passenger enplanements forecast to occur through the completion of Concourse A project.

The No Action Alternative

MNAA is presently implementing the previously approved CAGE project and will complete those actions, whether, or not the modifications in the Supplemental Environmental Assessment are approved. For that reason, the No Action alternative, which is required for analysis for the supplement, included the completion of the measures in the CAGE EA Proposed Action.

Environmental Impacts

The Supplement to the EA analyzed all relevant impact categories based on FAA Order 5050.4, *"National Environmental Policy Act Implementing Instructions for Airport Projects"* (NEPA). Those resource categories that the Sponsor's preferred alternative has the potential to impact are discussed below.

Air Quality

Construction of the proposed modifications and ancillary actions were determined to result in increases in emissions when compared to the No Action alternative. However, emissions would be below *de minimus* thresholds for all criteria pollutants each year of construction. Analysis

contained in Appendix A determined that emissions associated with operation of the Proposed Modifications would increase when compared to the updated no action; however, emissions would be below *de minimus* thresholds for all criteria pollutants.

Biological Resources

The portion of the study area associated with the proposed Concourse D extension is located on the airfield and comprised of paved landside and airfield surfaces, unpaved infield areas, existing buildings and a section of the existing Donelson Pike right-of-way. Vegetation in the portion of the Study area proposed for construction is mostly herbaceous with maintained lawn grasses and is consistent with the approved EA.

The undeveloped proposed staging area of approximately 35 acres of undeveloped Airport property consists of dry (mesic) and deciduous wooded land. It may contain species common to the region. During a November 2022 biological survey of the proposed staging area none of the required habitats for threatened and endangered species were observed with the exception of one dead tree with loose bark. The presence of threatened and endangered species and their habitat is consistent with that found in the CAGE EA; therefore, there would be no change to the affected environment for federally listed species and habitat. The proposed modifications would not result in changes in airport operations that would affect biological resources.

Section 4(f)

There would be no physical taking of 4(f) properties. For Section 4(f) purposes, use includes not only physical takings of Section 4(f) lands, but also adverse impacts referred to as indirect constructive use. Constructive use occurs if the indirect impacts substantially reduce the activities, features or attributes that contribute to the significance or enjoyment of the Section 4(f) resource. The CAGE EA identified the Metro Soccer Complex, located approximately 0.7 miles east of the CAGE Study area, as 4(f). The Metro Soccer Complex is a public recreation park open between dawn and 11:00 p.m. The park features include seven unlit soccer fields, portions of a multi-use trail with workout stations, restrooms, and associated parking. Noise contours completed for the CAGE EA indicated that approximately 0.6-acre of the complex as being indirectly affected by noise levels associated with the approved project. Noise contours completed for the Approved Project indicate approximately 1.2 acres of Metro Soccer Complex would be exposed to noise levels of DNL 65.

The nearest Section 4(f) resource to the proposed modifications is the Seven Oaks Park located approximately 0.4 miles northwest of the proposed staging area. The Seven Oaks Park is a recreational facility with grassy and athletic fields, a disc golf course, picnic tables and a playground owned and operated by the Metropolitan Government of Nashville and Davidson County. Due to the high ambient noise associated with aircraft operations and traffic on Donelson Pike and Murfreesboro Road, construction and operational noise are not anticipated to

significantly change the noise levels at Metro Soccer Complex or Seven Oaks Park. There would not be an indirect constructive use of either of these resources.

Hazardous Materials, Solid Waste Pollution Prevention

The proposed modifications will include demolition and relocation of several support facilities including the GSE fueling station, a trash compactor facility, a triturator, and a glycol and deicing facility. In addition, the actions will include generation of solid waste from construction activities and increased operational use. Waste disposal will result in accordance with applicable local state and federal guidelines. The amount of waste generated would not exceed local disposal and recycling capacity.

Land Use

The proposed modifications including the Concourse D extension, relocation of airport support facilities, and renovation of the Multipurpose Facility will occur entirely on airport property, zoned AR2A, Airport Overlay District, according to the Nashville Planning Department's online parcel viewer. The construction staging area would be located southwest side of Murfreesboro Pike on airport property but in an area designated RS10 and R10, both of which are residential according to the Metro Zoning District Land Use Table. Industrial uses, such as construction staging are not permitted by right according to the Metro Zoning Code. Construction and use of the staging area on land currently zoned residential would result in a land use inconsistent with local zoning policy.

Operation of the staging area would adhere to MNAA Rules and Regulations as well as Metro ordinances regarding construction noise, pollution prevention, and traffic controls. Construction activity may cause temporary fluctuations in noise levels; however, the Airport environs have a relatively high ambient noise level. Reasonable measures would be taken to minimize noise impacts and disturbances from construction related activities. In compliance with Metro Code of Ordinances, Chapter 17, Zoning, Article VIII.-Variances, MNAA would be required to obtain a zoning variance with the Metro Board of Zoning and Appeals.

Natural Resources and Energy Supply

The proposed modifications would increase the amount of energy used and natural resources consumed during construction. Energy used would be in the form of electricity and fuel expended during the use of construction equipment and during material hauling trips. Construction of the Concourse D extension, Air Freight Building and support facilities would require the use of additional building materials. Use of these materials are not expected to exceed local supply or cause shortages. Direct construction related impacts associated with energy or natural resources are not expected to be significant. After construction the operational demand may increase but is not expected to exceed energy supplies.

Noise and Land Use

The noise analysis conducted for the proposed modifications determined that there would be a small increase, 27.8 acres, in the size of noise contours and would include five (5) additional residential units and 21 residents within the 65 DNL contours but that none of the residences

would increase more than 1.5 DNL or greater. The affected residences are within a mitigation area where noise attenuation for the structures has already been addressed. Therefore, noise effects associated with the modifications are less than significant.

Socioeconomics

The proposed modifications are expected to result in an increase space for business opportunities in the airport's terminal facilities and improved passenger experience at the airport. This may lead to increased business activity, resulting in positive socioeconomic impacts. No adverse effects, or significant positive impacts are expected. Neither the Approved Project or construction of the Proposed Modifications would cause business or residential relocations. The nearest residential area is approximately 300 feet from the proposed staging area. While the construction will increase traffic, the increase is not expected to result in a reduction in level of service. When compared to the Approved Project, the Proposed Modifications would increase the potential for socioeconomic effects associated with operation of the proposed project. MNAA and its construction contractors would also adhere to the MNAA Airport Improvement Request Manual protocol as well as Best Management Practices (BMPs) and avoidance and minimization measures identified in the Metro Code of Laws, Chapter 10.56 Air Pollution Control to minimize noise and air pollution.

Water Resources

Three wetlands were identified within an existing detention basin proposed for expansion as part of the approved project; however, no construction activity was proposed within proximity to wetlands. The approved project will directly impact 1,627 linear feet of an intermittent stream and a 404 permit (has been received) is required for the approved project. Mitigation was specified in the FONSI for the CAGE environmental Assessment.

No wetlands exist within the airfield and adjacent landside areas associated with construction of and operation of the Concourse D Extension, relocated Air Freight Facility and airport support facilities and multipurpose facility.

The field survey completed for the wetland delineation report for the proposed staging area concluded that no wetland area was identified jurisdictional to the U.S. Army Corps of Engineers (USACE). A wetland delineation completed for the proposed construction staging area identified two ephemeral stream systems; totaling approximately 1,940 linear feet, and one excavation/depressional feature; approximately 0.07 acres, on the property. The U.S. Army Corps of Engineers (USACE) and the Metropolitan Nashville Airport Authority (Authority) conducted a site visit on January 17, 2023. After that site visit, the USACE stated that additional information was needed for them to make a jurisdictional determination of these areas located within the

construction staging area. The MNAA determined that the potential wetlands and jurisdictional waters within the construction staging area could be avoided. To protect these potential wetlands and jurisdictional waters, the Authority would provide a 50-foot buffer between wetlands/jurisdictional waters and employee parking, on the west side of the construction staging area, and materials and equipment storage and staging activities on the east side of the construction staging area (see Exhibit 3-8). At this time the Authority has not provided the additional information needed for the USACE to make a jurisdictional determination but may elect to do so in the future. At such time, the Authority would provide the additional information requested by the USACE and re-initiate consultation. However, in coordination with the USACE it was determined that the proposed modifications have the potential to further degrade the streams.

Construction Impacts

As part of construction activities, the proposed action could impact various environmental categories due to emissions, dust, storm water runoff and noise. These impacts are discussed in each environmental resource section within the Supplemental Environmental Assessment. Construction impacts are expected to be short-term and mitigated through best management practices. Significant impacts are not expected.

Environmental Mitigation

The Airport Sponsor (MNAA) shall be responsible for obtaining all necessary construction permits or certifications, prior to initiating construction activities, near or on the environmental resource. Project related permits, certifications, and other mitigation measures required are discussed below. It should be noted that the best management practices (BMPs) are considered standard operating procedures and are not considered mitigation.

Permits and Certifications

The Approved Project required the following permits or certifications:

1. National Pollutant Discharge Elimination System (NPDES) construction stormwater discharge permit.
2. Section 404 Individual Permit
3. Section 401 Water Quality Certification
4. Individual Aquatic Resources Alteration Permit.

The Modifications will require the following permits or certifications:

1. Will be included under the existing NPDES Tennessee Multi Sector Permit (TMSP).
2. Construction Stormwater Permit
3. Section 401 Water Quality Permit

Public Involvement

The following agencies were consulted in preparation of this Supplemental EA:

Federal Agencies

- U. S. Federal Aviation Administration
- U. S. Army Corps of Engineers
- U. S. Fish and Wildlife Service
- U. S. Environmental Protection Agency
- U. S. Forest Service
- U. S. Coast Guard
- Federal Highway Administration
- Federal Emergency Management Agency
- National Park Service
- Natural Resources Conservation Service, Division of Water Resources

State of Tennessee Agencies

- Tennessee Valley Authority (TVA)
- Tennessee Department of Environment and Conservation, Division of Water Resources (DWR)
- Tennessee Department of Environment and Conservation, Division of Remediation (DOR)
- Tennessee Historical Commission (THC) as State Historic Preservation Office (SHPO)
- Tennessee Department of Environment and Conservation, Division of Water Resources, Division of Archaeology (DOA)
- Tennessee Department of Environment and Conservation, Division of Water Resources, Division of Transportation (TDOT)
- Tennessee Department of Agriculture, Division of Forestry (TDF)
- Tennessee Wildlife Resources Agency (TWRA)

Local/Regional Agencies

Metropolitan Government of Nashville and Davidson County (METRO)

The Notice of Availability (NOA) for the Draft Supplemental EA was published on the Airports Authority's website and in the Nashville Tennessean on Wednesday, February 15, 2023. A physical copy of the Draft Supplemental EA was available for public review at MNAAs offices, located at 1370 Murfreesboro Pike, Building #3, Nashville, Tennessee 37127. The Airports Authority made the document available on their website. The comment period for the Draft Supplemental EA began February 15, 2023, and closed on March 17, 2023. Anyone wishing to comment on the information and conclusions in the Draft Supplemental EA was allowed to do so at any time during the review and comment period. Commenters were encouraged to be as specific as possible and to address the adequacy of the Proposed Action, the merits of the alternatives, the analysis of potential environmental impacts, and the mitigation being considered. The Airports Authority and the FAA reviewed and considered all comments received during

the public comment period. There were three (3) comment letters received. The letters and responses are in Appendix H of the final Supplemental Environmental Concourse and Gate Expansion Project.

Decision

After careful and through consideration of the facts contained herein, the undersigned finds that the approval of the proposed development is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of the National Environmental Policy Act of 1969 (NEPA) and that it will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2) (C) of NEPA.

Approved: _____ Date: _____
Tommy L. Dupree, Manager,
Memphis Airports District Office