FOCUSED
ENVIRONMENTAL
ASSESSMENT
FOR A
REPLACEMENT
AIRPORT TRAFFIC
CONTROL TOWER
AT CECIL AIRPORT

This environmental assessment becomes a federal document when evaluated, signed and dated by the responsible Federal Aviation Administration official.

Responsible FAA Official:

Date:





FOCUSED ENVIRONMENTAL ASSESSMENT FORM FOR AIRPORT DEVELOPMENT PROJECTS

FEDERAL AVIATION ADMINISTRATION ORLANDO AIRPORTS DISTRICT OFFICE | SOUTHERN REGION AIRPORTS DIVISION

Airport Name:	Cecil Airport (VQQ)
Proposed	
Project:	Replacement Airport Traffic Control Tower
This Environmental A official.	ssessment becomes a Federal document when evaluated and signed by the responsible FAA
Respon <mark>sible FAA</mark>	Official: Dutilenace
	Date: 2/2/2016

DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION ORLANDO AIRPORTS DISTRICT OFFICE ORLANDO, FLORIDA

FINDING OF NO SIGNIFICANT IMPACT

REPLACEMENT AIRPORT TRAFFIC CONTROL TOWER CECIL AIRPORT (VQQ)

JACKSONVILLE, FL

February 2016

BACKGROUND: The National Environmental Policy Act (NEPA) requires federal agencies to incorporate environmental considerations during the planning process of proposed federal actions. Pursuant to the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA, Part 1502.13, the Jacksonville Aviation Authority, as the Airport Sponsor, has prepared the attached Environmental Assessment (EA) to analyze the potential environmental effects of the development of a replacement Airport Traffic Control Tower (ATCT) at the Cecil Airport/Cecil Spaceport (VQQ).

The EA was prepared in accordance with the requirements of the Federal Aviation Administration (FAA) Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions. The FAA is the lead federal agency for compliance with NEPA for federal actions at airports. FAA's approval of an airport project constitutes the federal action subject to NEPA.

PROPOSED PROJECT: The Proposed Project is the replacement of the existing airport traffic control tower (ATCT) at Cecil Airport (VQQ) in Jacksonville, Florida (see Figure 1 in the attached EA). The JAA proposes to construct the replacement, 135.5-foot-tall ATCT (including antennas and lightning rods) about 140 feet west of the existing ATCT (see Figure 2 in the attached EA). The existing ATCT would be demolished.

The Proposed Project involves the following connected activities:

- » installation of new equipment in the replacement ATCT;
- » extension of the security fencing by about 140 feet around the replacement ATCT;
- » construction of approximately 70 linear feet of sidewalk to provide access to the replacement ATCT from the existing parking area;
- » extension of utility services to the replacement ATCT; and
- » limited trimming, topping, or removal of trees within an approximately seven-acre area to meet line-of-sight requirements for the replacement ATCT.

The proposed site for the replacement ATCT is approximately 140 feet west of the existing ATCT. The replacement ATCT is estimated to have a building footprint of approximately 26 feet by 26 feet (676 square-feet) and an overall height, including antennas and lighting rods, of 135.5 feet above ground level.

The replacement ATCT would include a control cab on top of a functional shaft. The control cab would have an eye height of 107 feet above ground level. Air Traffic Control Specialists (ATCS) would have unobstructed lines-of-sight to all runways, taxiways, aircraft aprons, and the Airport traffic pattern, with the exception of a two areas. The 2015 Cecil Airport ATCT Siting Study Safety Risk Management Document (Siting Study) notes that views from the replacement ATCT to a portion of the non-movement ramp area and the southern end of Taxiway A would be partially obstructed (JAA, 2015). The partially obstructed view from the replacement ATCT to the non-movement ramp area, located northeast of the replacement ATCT, is due to the administration building and a general aviation hangar. This partially obstructed view does not affect

ATCSs' ability to direct aircraft movements on any taxiways or runways. The partially obstructed view to the southern end of Taxiway A is due to trees. A limited number of trees would be trimmed, topped, or removed to provide an ATCS an unobstructed view of the southern end of Taxiway A. A survey of those trees would occur after the construction of the replacement ATCT to determine which trees need to be trimmed. topped, or removed. As part of the Siting Study, a Part 7460-1, Notice of Proposed Construction or Alternation was filed with the FAA Airspace Regulations and Air Traffic Control Procedures Group to perform an Obstruction Evaluation/Airport Airspace Analysis (OE/AAA). The OE/AAA shows that the replacement ATCT has the potential to impact future area navigation (RNAV) – global positioning system (GPS) procedure for Runway 27R that would increase the minimum descent altitude. However, the JAA staff has indicated that there are no plans to make Runway 27R an instrument runway. The replacement ATCT would not penetrate any of the Part 77 surfaces associated with the runways at the Airport. However, the JAA would maintain red FAA L-810 obstruction lighting on the replacement ATCT in accordance with FAA AC 70/7460-1K, Obstruction Marking and Lighting.

The control cab would initially accommodate two ATCS positions, but would have space for up to two additional working or supervisory positions. The existing ATCT's access road and parking lot would provide vehicular access to, and parking for, the replacement ATCT. A new 70-foot long sidewalk would provide pedestrian access from the parking lot to the replacement ATCT. The existing ATCT would remain in operation during construction of the replacement ATCT. Construction of the replacement ATCT would not create line-of-site obstructions to key points of the airfield's movement area from the existing ATCT. Operations from the replacement ATCT would begin after construction is complete and the proper equipment is installed and tested. At that time, the existing ATCT would be demolished. The removal of the existing ATCT would not create line-of-site obstructions to key points of the airfield's movement area from the replacement ATCT. The existing ATCT connects to a two-story building that houses the Cecil Airport administrative offices, Jacksonville Jetport, and Robinson Aviation, Inc. The removal of the existing ATCT would involve removing only the ATCT, not the entire building where it is collocated.

Section 4 of the attached EA provides additional information regarding the Proposed Project.

PURPOSE AND NEED: The JAA proposes to construct a replacement ATCT at the Airport to improve the functional and operational capabilities of the service provided by the ATCT. The replacement ATCT would meet the requirements in FAA Orders 1600.69B, FAA Facility Security Management Program and 6480.7E, ATCT and Terminal Radar Approach Control (TRACON) Design Policy improving the safety of the ATCS and Airport users. The ATCT, which was constructed in 1954, has exceeded its useful life. According to the U.S. Department of Transportation (USDOT), the average ATCT facility has an expected useful life of approximately 25 to 30 years (USDOT, 2008). An assessment of the existing ATCT was conducted in July 2013 (JAA, 2013). According to the assessment, the exterior of the building shows advanced signs of

deterioration; many of the interior building systems are outdated and outmoded; and many of the existing ATCT's components now fall short of the building code requirements for structures, systems, life safety, and accessibility.

Further explanation of the Purpose and Need is provided in Section 5 of the attached EA.

FEDERAL ACTIONS: The federal actions are unconditional approval of the portion of the VQQ Airport Layout Plan (ALP) that depicts the Proposed Project and its connected actions.

FAA acceptance of a NEPA analysis document and issuance of a decision document or finding is only a determination that the document satisfies applicable environmental statutes and regulations. Similarly, FAA approval of an ALP does not indicate the FAA will participate in the cost of any proposed development. ALP approval indicates that all existing and proposed airport development shown on the plan meets applicable FAA airport design standards or a current FAA-approved Modification of Airport Design Standards and that the proposed development is useful and efficient.

ALTERNATIVES: The EA consider the Proposed Project, two alternative site locations, and the No Action Alternative. Under the No Action Alternative, the JAA would not build a replacement ATCT and the existing ATCT would remain in operation. The JAA would continue to maintain the building and provide continuous repairs and improvements, as needed.

The Siting Study for the replacement ATCT considered three alternative locations, including the Proposed Project site (see Attachment B in the attached EA for excerpts from the Siting Study). The locations were determined based on the guidance provided in FAA Order 6480.4B, Airport Traffic Control Tower Siting Criteria. The three locations were analyzed according to various criteria, including: visual performance, Terminal Instrument Procedures (TERPS), Part 77 surfaces, sunlight/daylight glare, artificial lighting, atmospheric conditions, industrial municipal discharge, site access, interior physical barriers, and security (JAA, 2015). The two alternative sites to the Proposed Project site are considered Alternative Site #1 and Alternative Site #2 in the attached EA. Alternative Site #1 is located approximately 4,400 feet southeast of the existing ATCT in an unused portion of the Airport property. Alternative Site #2 is located approximately 2,900 feet south of the existing ATCT in an unused portion of the Airport property.

Compared to the Proposed Project site, a replacement ATCT at Alternative Sites #1 or #2 would result in greater impacts to the Airport's navigational aids and Part 77 surfaces, would require additional ground disturbing activities (i.e., construction of an access road and parking lot, modifying or removing of a greater amount of trees), and the JAA would incur additional construction costs. Although both alternative sites meet the JAA's Purpose and Need, the additional impacts result in both alternatives being impractical. Therefore, Alternatives #1 and #2 are not evaluated further in the EA.

Further explanation of the alternatives analysis is provided in Section 6 of the attached EA.

ACTIONS AND PERMITS: The Proposed Project's site for the replacement ATCT is approximately 140 feet west of the existing ATCT. The replacement ATCT is estimated to have a building footprint of approximately 26 feet by 26 feet (676 square-feet) and an overall height, including antennas and lighting rods, of 135.5 feet above ground level. A limited number of trees would be trimmed, topped, or removed within an approximately seven-acre area to provide an ATCS an unobstructed view of the southern end of Taxiway A. This seven acre area includes wetlands and 100-year floodplain resources. The existing ATCT's access road and parking lot would provide vehicular access to, and parking for, the replacement ATCT. A new 70-foot long sidewalk would provide pedestrian access from the parking lot to the replacement ATCT.

Permits required to implement the Proposed Action include the following:

- Environmental Resource Permit (ERP) from the St. Johns River Water Management District (SJRWMD) prior to construction;
- National Pollutant Discharge Elimination System (NPDES) Permit for construction;
- A U.S. Army Corps of Engineers (USACE) Section 404 permit (Individual or Nationwide) may be required for impacts to wetlands as a result of tree trimming and removal.

The environmental analysis indicates that the Proposed Action will not result in significant environmental impacts for any environmental resource or category. Environmental impacts as a result of construction of the Proposed Action are minor and temporary in nature. The USFWS found that the Proposed Project may affect, but is not likely to adversely affect resources protected by the Endangered Species Act of 1973 (see Attachment F in the EA for the USFWS letter dated October 27, 2015). Species protected under the Migratory Bird Treaty Act (MBTA) were observed within the project study area, however, the JAA has committed to conducting nest surveys prior to starting construction, therefore, the Proposed Project would not directly or indirectly impact species protected under the MBTA. The Florida Fish and Wildlife Conservation Commission (FWC) did not identify any listed species in the project study area (see Attachment E-2 in the EA for the FWC coordination letter dated April 21, 2015).

The Proposed Action's potential impacts, combined with the impacts for past, current, and potential future on- and off-Airport projects are not anticipated to exceed any of the identified significant impact thresholds listed in FAA Order 1050.1F. Combined impacts of other past, present, and future on Airport and off-Airport projects are not anticipated to be considered substantial either individually or cumulatively by any federal, state or local agency.

Further explanation of the environmental analysis is provided in Section 8 of the attached EA.

CONSISTENCY WITH APPROVED PLANS OR LAWS: The Proposed Project is consistent with existing environmental plans, laws, and administrative determinations of Federal, state, regional, or local agencies. The State of Florida has determined that the Proposed Action is consistent with the Florida Coastal Management Program (FCMP). The Proposed Action would not require land use or zoning changes and is consistent with all regional and local land use and comprehensive plans.

MITIGATION MEASURES: As noted in Proposed Project, the partially obstructed view to the southern end of Taxiway A is due to trees. A limited number of trees would be trimmed, topped, or removed within an approximate seven acre area to provide an ATCS an unobstructed view of the southern end of Taxiway A. A survey of those trees would occur after the construction of the replacement ATCT to determine which trees need to be trimmed, topped, or removed, limited trimming, topping, or removal of trees to meet line-of-sight requirements for the replacement ATCT. The seven acre area includes wetlands and 100-year floodplain resources. The FAA would obtain an Environmental Resource Permit (ERP) from the St. Johns River Water Management District (SJRWMD) and a U.S. Army Corps of Engineers (USACE) Section 404 permit (Individual or Nationwide) for impacts to wetlands as a result of tree trimming and removal. The JAA has committed to obtaining all environmental permits and, if necessary, providing appropriate mitigation to implement the Proposed Project. Once final information is obtained on line-of-sight obstructions, the JAA will coordinate with the FAA and state and federal agencies, as required.

Additionally, the JAA has committed to conducting a nest survey prior to the start of ground disturbing activities to minimize impacts to species protected by the MBTA. The purpose of the nest survey is to ensure that there are no active avian nests within the construction limits. Should active avian nests be discovered, the JAA would coordinate with the appropriate state and federal agencies to determine the best steps to take to minimize potential effects (e.g., delay affecting trees; apply for a permit to take species protected by the MBTA).

PUBLIC AVAILABILITY: A Notice of Availability (NOA) of the Draft EA was published in The Florida Times Union on October 28, 2015. The NOA described the Proposed Action, provided a summary of impacts, noted that the project impacted wetlands and the 100-year floodplain, and explained how to submit comments on the Draft EA. No public comments were received on the Draft EA. The only agency comment received on the Draft EA was from the Florida Department of Environmental Protection Florida State Clearinghouse noting that the Proposed Action was consistent with the FCMP.

APPROVAL STATEMENT: After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal actions are consistent with existing national environmental policies and objectives as set forth in Section 101 of NEPA and other applicable environmental requirements and 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:

RECORD OF DECISION AND ORDER

I have carefully considered the FAA's statutory mandate to ensure the safe and efficient use of the national airspace system as well as the other aeronautical goals and objectives discussed in the EA. My review of the EA and determination regarding issuance of the FONSI included evaluation of the purpose and need that this proposed project would serve, the alternate means of achieving the purpose and need, the environmental impacts associated with these alternatives, and any mitigation necessary to preserve and enhance the human, cultural, and natural environment.

Under the authority delegated to me by the FAA Administrator, I find the proposed project described in the EA is reasonably supported. I, therefore, direct that action be taken to carry forward the necessary agency actions discussed in the EA and in the attached FONSI. This Record of Decision (ROD) represents the FAA's final decision and approval for the actions identified in the EA and constitutes a final order of the FAA Administrator subject to review by the Courts of Appeal of the United States in accordance with the provisions of 49 U.S.C. § 46110. Any party seeking to stay implementation of the ROD must file an application with the FAA prior to seeking judicial relief as provided in Rule 18(a) of the Federal Rules of Appellate Procedure.

Issued on:

Bart Vernace, P.E.

Manager

FAA Orlando Airports District Office

This Form is to be used only for <u>limited</u> types of projects. You must contact an FAA ORL/ADO Environmental Protection Specialist (EPS) before completing this form. See instructions page.

APPLICABILITY

This Form can be used if the proposed project meets the following criteria:

- 1) It is not a project that is normally categorically excluded (see paragraphs 303 and 307-312 in FAA Order 1050.1E) or
- 2) It is a project that is normally categorically excluded but, in this instance, it involves at least one extraordinary circumstance that will impact the human or natural environment (see FAA Order 1050.1E, paragraph 304 and the applicable Appendix section. or
- 3) The proposed project is one that normally requires an EA at a minimum (see paragraph 506 in FAA Order 5050.4B), but it is not anticipated to result in any significant impacts and
- 4) The proposed project must fall under one of the following categories of Federal Program actions:
 - (a) Approval of a project on an Airport Layout Plan (ALP).
 - (b) Approval of Federal funding for airport development.
 - (c) Requests for conveyance of government land.
 - (d) Approval of release of airport land.
 - (e) Approval of the use of Passenger Facility Charges (PFC).
 - (f) Approval of development or construction on a Federally obligated airport.



INSTRUCTIONS

NOTE: This Form was prepared by FAA Orlando Airports District Office/Southern Region Airports Division and is intended for use in this District only.

Introduction: This Focused Environmental Assessment (EA) Form is based upon the guidance in Federal Aviation Administration (FAA) Orders 5050.4B – *NEPA Implementing Instructions for Airport Actions* and 1050.1E – *Environmental Impacts: Policies and Procedures*, and the FAA *Environmental Desk Reference for Airport Actions*, which incorporate the Council on Environmental Quality's (CEQ) regulations for implementing NEPA, as well as US Department of Transportation (DOT) environmental regulations, and many other Federal statutes and regulations designed to protect the Nation's natural and human resources. The information provided by sponsors and their consultants through the use of this Form enables the FAA ORL/ADO to evaluate compliance with NEPA and the applicable Federal special purpose laws.

Use: This Form is intended to be used when a project cannot be categorically excluded (CATEX) from a formal EA, but when the environmental impacts of the proposed project are expected to be insignificant and a detailed EA would not be appropriate. Accordingly, this Form is intended to meet the intent of, and satisfy the FAA's regulatory requirements under NEPA. Proper completion of this Form would allow the FAA to determine whether the proposed airport development project can be processed as a Focused EA with the accompanying documentation, or whether a more detailed EA or EIS must be prepared.

This Form is to be used in conjunction with applicable Federal orders, state and local, laws and regulations, and guidance documents, and in consultation with the appropriate Federal, state and local resource agencies. Sponsors and their consultants should review the requirements of special purpose laws (See 5050.4B, Table 1-1 for a summary of applicable laws). Sufficient documentation in this Form is necessary to enable the FAA to assure compliance with <u>all</u> applicable environmental requirements. Accordingly, any required consultations, findings or determinations by Federal and state agencies, or Tribal governments, are to be coordinated, and completed if necessary, prior to submitting this Form to FAA for review. Coordination with Tribal governments must be conducted through the FAA. We encourage sponsors to begin coordination with these entities as early as possible to provide for their sufficient review and response time. Complete information will help FAA expedite its review. Please note: When requesting Discretionary Funding for an airport project, the appropriate environmental documentation should be submitted to the ORL/ADO by April 30th of the year preceding the year funding is requested.

Availability: An electronic version of this Focused EA Form is available upon request from an ORL/ADO EPS. Other sources of environmental information including guidance and regulatory documents are available on-line at http://www.faa.gov/airports_airtraffic/airports/environmental.



COMPLETE THE FOLLOWING INFORMATION:

1. PROJECT LOCATION:

 Airport Name and Identifier:
 Cecil Airport (VQQ)

 Airport Address:
 13365 Simpson Way

 City:
 Jacksonville
 County:
 Duval

 State:
 Florida
 Zip Code:
 32221

2. AIRPORT SPONSOR INFORMATION:

Point of Contact:Kelly Dollarhide, Airport ManagerAddress:13365 Simpson Way, Jacksonville, FL 32221Business Phone:(904) 573-1604Cell:n/aFAX:n/aEMAIL:Kelly.Dollarhide@cecilairport.com

3. EVALUATION FORM PREPARER INFORMATION:

Point of Contact: David Alberts, RS&H, Inc.

Address: 10748 Deerwood Park Boulevard South, Jacksonville, FL 32256

Business Phone: (904) 256-2500 Cell: n/a

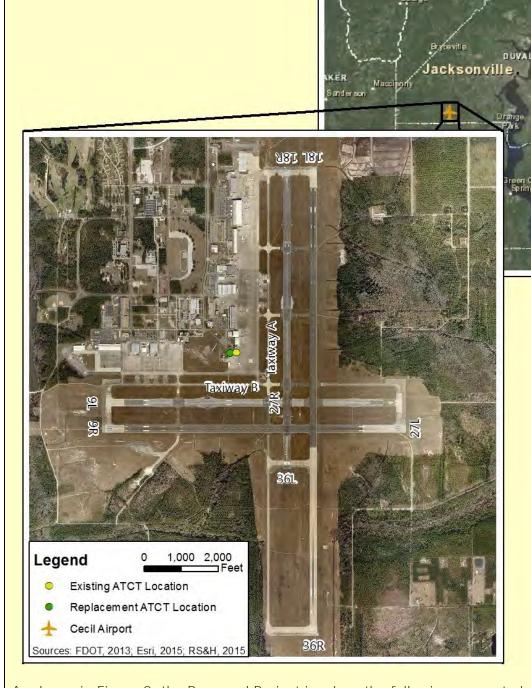
FAX: n/a EMAIL: David.Alberts@rsandh.com

4. PROPOSED PROJECT List and clearly describe all components of the proposed project including all connected actions. Attach graphics of the Proposed Project area with the locations(s) of the proposed action(s) identified on the current ALP and a recent aerial. Briefly identify whether the Proposed Project would impact any specially protected resources (e.g. wetlands, floodplains, listed species) and list any Federal, state, or local permits that would be required for impacts to these resources. Summarize project costs, including mitigation costs, if applicable. Discuss how the project will be funded. Include a project schedule identifying when the project would be constructed and operational.

The Jacksonville Aviation Authority (JAA) has prepared this Focused Environmental Assessment (Focused EA) for the replacement of the existing airport traffic control tower (ATCT) at Cecil Airport (the Airport) in Jacksonville, Florida (see Figure 1). The JAA proposes to construct the replacement, 135.5-foot-tall ATCT (including antennas and lightning rods) about 140 feet west of the existing ATCT (see Figure 2). The existing ATCT would be demolished.

The JAA is seeking the FAA's unconditional approval of the modified airport layout plan (ALP) depicting the Proposed Project (construction of a replacement ATCT, demolition of the existing ATCT, and connected actions listed in the following paragraphs and shown in Figure 2) at the Airport. The JAA may also seek approval of funding from the Federal Aviation Administration (FAA) to help finance the Proposed Project.

Figure 1 Airport Location



As shown in Figure 2, the Proposed Project involves the following connected activities in addition to those actions previously described:

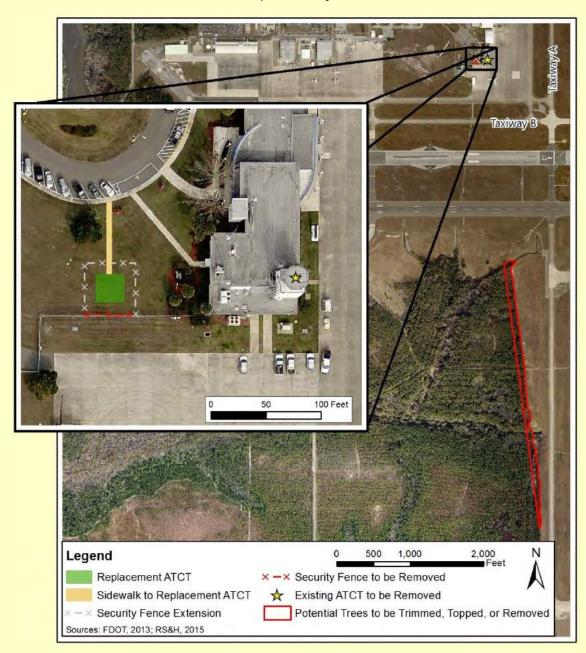
» installation of new equipment in the replacement ATCT;

ST. Johns



- » extension of the security fencing by about 140 feet around the replacement ATCT;
- » construction of approximately 70 linear feet of sidewalk to provide access to the replacement ATCT from the existing parking area;
- » extension of utility services to the replacement ATCT; and
- » limited trimming, topping, or removal of trees within an approximately seven-acre area to meet line-of-sight requirements for the replacement ATCT.

Figure 2 Proposed Project



As Figure 2 shows, the proposed site for the replacement ATCT is approximately 140 feet west of the existing ATCT. For the purposes of this Focused EA, the replacement ATCT is estimated to have a building footprint of approximately 26 feet by 26 feet (676 square-feet)



and an overall height, including antennas and lighting rods, of 135.5 feet above ground level.

The replacement ATCT would include a control cab on top of a functional shaft.¹ The control cab would have an eye height of 107 feet above ground level.² Air Traffic Control Specialists (ATCS) would have unobstructed lines-of-sight to all runways, taxiways, aircraft aprons, and the Airport traffic pattern, with the exception of a two areas. The 2015 *Cecil Airport ATCT Siting Study Safety Risk Management Document* (Siting Study) notes that views from the replacement ATCT to a portion of the non-movement ramp area and the southern end of Taxiway A would be partially obstructed (JAA, 2015).

The partially obstructed view from the replacement ATCT to the non-movement ramp area, located northeast of the replacement ATCT, is due to the administration building and a general aviation hangar. This partially obstructed view does not affect ATCSs' ability to direct aircraft movements on any taxiways or runways.

The partially obstructed view to the southern end of Taxiway A is due to trees. A limited number of trees would be trimmed, topped, or removed to provide an ATCS an unobstructed view of the southern end of Taxiway A. A survey of those trees would occur after the construction of the replacement ATCT to determine which trees need to be trimmed, topped, or removed.

As part of the Siting Study, a Part 7460-1, *Notice of Proposed Construction or Alternation* was filed with the FAA Airspace Regulations and Air Traffic Control Procedures Group to perform an Obstruction Evaluation/Airport Airspace Analysis (OE/AAA).³ The OE/AAA shows that the replacement ATCT has the potential to impact a future area navigation (RNAV) – global positioning system (GPS) procedure for Runway 27R that would increase the minimum descent altitude.⁴ However, the JAA staff has indicated that there are no plans to make Runway 27R an instrument runway. The replacement ATCT would not penetrate any of the Part 77 surfaces associated with the runways at the Airport. However, the JAA would maintain red FAA L-810 obstruction lighting on the replacement ATCT in accordance with FAA AC 70/7460-1K, *Obstruction Marking and Lighting*.

The control cab would initially accommodate two ATCS positions, but would have space for up to two additional working or supervisory positions. The existing ATCT's access road and parking lot would provide vehicular access to, and parking for, the replacement ATCT. A new 70-foot long sidewalk would provide pedestrian access from the parking lot to the replacement ATCT.

The existing ATCT would remain in operation during construction of the replacement ATCT. Construction of the replacement ATCT would not create line-of-site obstructions to key points of the airfield's movement area from the existing ATCT. Operations from the replacement ATCT would begin after construction is complete and the proper equipment is installed and tested. At that time, the existing ATCT would be demolished. The removal of the existing ATCT would not create line-of-site obstructions to key points of the airfield's movement area from the replacement ATCT.

The existing ATCT connects to a two-story building that houses the Cecil Airport administrative offices, Jacksonville Jetport, and Robinson Aviation, Inc. The removal of the

¹ The shaft would be oriented in a manner to prevent affecting the very high frequency omnidirectional radio range (VOR) navigational aid (NAVAID).

² This eye height meets the threshold required to pass the line-of-sight angle of incidence as determined by the Federal Aviation Administration's (FAA's) Air Traffic Control Visibility Tool.

³ OE/AAA case number: ASN 2014-ASO-804-NRA

⁴ The minimum descent altitude is the lowest altitude, relative to mean sea level, to which descent is authorized on final approach, or during circle-to-land maneuvering when performing a non-precision approach.



existing ATCT would involve removing only the ATCT, not the entire building where it is collocated.

According to preliminary engineering estimates, the Proposed Project would cost approximately \$5.2 million. Funding for the Proposed Project could potentially come from the FAA and the JAA.

The JAA anticipates starting construction of the Proposed Project Fall 2016. Construction would occur over an approximately six to eight month period.

5. DESCRIBE THE <u>PURPOSE</u> OF AND <u>NEED</u> FOR THE PROJECT

Provide a concise description of the purpose and need for the Proposed Project. Attach, as appropriate, any current airport planning analysis that supports or justifies the purpose and need. If Federal funding is to be requested, airport planning analysis must be reviewed and concurred with by an ORL/ADO Program Manager prior to submitting this Form to the ORL/ADO EPS. Per Applicability section of this Form (Page 2, number 4), identify the proposed Federal Action.

The Purpose and Need identifies the problem facing an airport sponsor (the "Need" for action) and the proposed solution to the problem (the "Purpose" of the action). The following paragraphs describe the Purpose and Need for the JAA's Proposed Project.

Purpose – The JAA proposes to construct a replacement ATCT at the Airport to improve the functional and operational capabilities of the service provided by the ATCT. The replacement ATCT would meet the requirements in FAA Orders 1600.69B, *FAA Facility Security Management Program* and 6480.7E, *ATCT and Terminal Radar Approach Control (TRACON) Design Policy* improving the safety of the ATCS and Airport users.

Need – The ATCT, which was constructed in 1954, has exceeded its useful life. According to the U.S. Department of Transportation (USDOT), the average ATCT facility has an expected useful life of approximately 25 to 30 years (USDOT, 2008). An assessment of the existing ATCT was conducted in July 2013 (JAA, 2013). According to the assessment, the exterior of the building shows advanced signs of deterioration; many of the interior building systems are outdated and outmoded; and many of the existing ATCT's components now fall short of the building code requirements for structures, systems, life safety, and accessibility. Specifically, the following building components are in poor condition:

- » accessibility;
- » foundation;
- » functional spaces;
- » glazing systems;
- » exterior rails, ladders, etc.;
- » roof
- » access control and security;
- » lighting;
- » fire separation;
- » mechanical systems; and
- » electrical systems.

⁵ The assessment of the current ATCT did not include any testing of materials.



The assessment identified the lack of fire sprinklers and smoke detectors within the existing ATCT. The existing ATCT also has asbestos containing materials (ACM). Some areas of the existing ATCT have labels to identify where ACM is present. However, it is likely that not all ACM are labeled. Suspected ACM were identified in numerous building components that include, but are not limited to, the existing thermal insulations, duct mastic, roof mastics and pitch pockets, and mechanical dampers. Suspect lead based paints (LBP) were identified on portions of the wall and ceiling during the assessment. It is likely, given the age of the existing ATCT, that multiple layers of paint have been applied over older LBP layers. The assessment also identified potential polychlorinated biphenyls (PCB) or mercury containing light fixtures and switches. Although the assessment of the existing ATCT did not include review of the operational aspects of the ATCT, it notes that the cab and other spaces in the existing ATCT are likely undersized to support current systems and technology needs. See Attachment A for the full assessment.

The JAA has completed various renovation and rehabilitation projects to the existing ATCT (e.g., new stair treads, new heating ventilation and air conditioning (HVAC) unit, replacement of two tower cab glass panels). However, these renovation and rehabilitation projects have not addressed the major deterioration concerns of the existing ATCT. Additionally, the presence of ACM in the existing ATCT significantly increases the costs of any major repair and renovation projects to the existing ATCT.

6. ALTERNATIVES TO THE PROJECT:

(1) Discuss the consequences of the "No Action" alternative e.g. what are the operational, safety, efficiency, or economic effects to the airport sponsor of taking no action.

No Action Alternative

Under the No Action Alternative, the JAA would not build a replacement ATCT and the existing ATCT would remain in operation. The JAA would continue to maintain the building and provide continuous repairs and improvements, as needed.

The No Action Alternative does not meet the **JAA's** Purpose and Need. As Section 5 of this Focused EA describes, the existing ATCT has surpassed its useful life. Additionally, continued maintenance of the existing ATCT would be a burden on the **JAA's budget.** However, the No Action Alternative would avoid potential environmental impacts associated with the implementation of the Proposed Project (e.g., would not require construction or demolition activities or the trimming, topping, or removal of trees).

Although the No Action Alternative does not meet the JAA's Purpose and Need, this Focused EA carries this alternative forward in the environmental analysis to serve as a baseline for comparing the impacts of the Proposed Project, as required by 40 Code of Federal Regulations (CFR) 1502.4(d).

- (2) Other than the Proposed Project and No Action alternative, list any other alternatives considered. For each alternative considered:
- List any connected actions
- Explain whether it is considered reasonable and/or feasible e.g. an alternative is not considered reasonable if it would not meet the purpose and need and/or if it is not technically or economically feasible

⁶ It is important to note that the undisturbed asbestos and asbestos in a non-friable state within the building does not pose a risk to ATCS using the current ATCT.



- Identify if it would impact specially protected resources (e.g. wetlands, floodplains, listed species) and list any Federal, state, or local permits that would be required for impacts to these resources
- Attach drawings, if appropriate, to aid in understanding alternative configurations.

Alternative Site #1

The Siting Study for the replacement ATCT considered three alternative locations, including the Proposed Project site (see Attachment B for excerpts from the Siting Study). The locations were determined based on the guidance provided in FAA Order 6480.4B, *Airport Traffic Control Tower Siting Criteria*. The three locations were analyzed according to various criteria, including: visual performance, Terminal Instrument Procedures (TERPS), Part 77 surfaces, sunlight/daylight glare, artificial lighting, atmospheric conditions, industrial municipal discharge, site access, interior physical barriers, and security (JAA, 2015). The two alternative sites to the Proposed Project site are considered Alternative Site #1 and Alternative Site #2 in this Focused EA. Figure 3 shows the location of the two alternative sites.

Figure 3
Alternative Sites for the Replacement ATCT





Alternative Site #1 (referred to in the Siting Study as Site 2), approximately 4,400 feet southeast of the existing ATCT, is in an unused portion of the Airport property. A replacement ATCT at Alternative Site #1 would have an overall height, including antennas and lighting rods, of approximately 163.5 feet above ground level. The control cab would have an eye height of 138 feet above ground level.⁷ ATCS would have unobstructed lines-of-sight to all runways, taxiways, aircraft aprons, and the Airport traffic pattern except for the south end of future Taxiway E and the ends of future Taxiway S due to trees. Approximately 12 acres of trees would need to be trimmed, topped, or removed to provide an unobstructed view. A replacement ATCT at Alternative Site #1 would require the construction of an access road and parking lot, and the extension of utilities.

Alternative Site #2

The Alternative Site #2 (referred to in the Siting Study as Site 3), approximately 2,900 feet south of the existing ATCT, is also in an unused portion of the Airport property. A replacement ATCT at Alternative Site #2 would have an overall height, including antennas and lighting rods, of approximately 163.5 feet above ground level. The control cab would have an eye height of 135 feet above ground level.⁸ ATCS would have unobstructed lines-of-sight to all runways, taxiways, aircraft aprons, and the Airport traffic pattern except for the south end of Taxiway A. The partial obstruction is due to trees and approximately 35 acres of trees would need to be trimmed, topped, or removed to provide an unobstructed view. Similar to the Alternative Site #1, a replacement ATCT at the Alternative Site #2 would require the construction of an access road and parking lot, and the extension of utilities.

(3) Summarize the alternatives analysis by comparing the Proposed Project, No Action alternative, and any other alternatives considered e.g. whether an alternative meets the purpose and need, is technically or economically feasible, or would impact specially protected resources. If the alternative analysis indicates that there are reasonable alternatives to the Proposed Project, do not complete this Form and contact an FAA ORL/ADO EPS. NOTE: The No Action alternative is carried forward in Environmental Consequences to provide a basis for comparison against the Proposed Project.

No Action Alternative: As Section 6(1) of this Focused EA describes, the No Action Alternative does not meet the stated Purpose and Need for the Proposed Project. The existing ATCT has surpassed its useful life, as defined by the USDOT. The JAA's continued maintenance and operation of the existing ATCT would be a burden on the JAA's budget. However, the No-Action Alternative would avoid potential environmental impacts associated with the implementation of the Proposed Project. Although the No Action Alternative does not meet the JAA's Purpose and Need, this Focused EA carries it forward in the environmental analysis to serve as a baseline for comparing the impacts of the Proposed Project.

Alternative Sites #1 and #2: The alternatives analysis for this Focused EA compares the potential navigational aid impacts, Part 77 surface impacts, site access, tree removal, and construction cost estimates of Alternative Sites #1 and #2 to the Proposed Action.

Navigational Aid Impacts: A Part 7460-1 was filed with the FAA Airspace Regulations and Air Traffic Control Procedures Group to perform an OE/AAA for the three sites considered in the Siting Study (Proposed Project site and Alternative Sites #1 and #2). Similar to the Proposed Project site, the OE/AAA for Alternative Sites #1 and #2 show that there would be impacts to the future instrument procedures including RNAV-GPS procedure for Runway 27R

⁷ This eye height meets the threshold required to pass the line-of-sight angle of incidence as determined by the Federal Aviation Administration's (FAA's) Air Traffic Control Visibility Tool.

⁸ This eye height meets the threshold required to pass the line-of-sight angle of incidence as determined by the Federal Aviation Administration's (FAA's) Air Traffic Control Visibility Tool.



that would increase the minimum descent altitude, similar to the Proposed Project. However, the JAA staff have indicated that there are no plans to make Runway 27R an instrument runway. The OE/AAA for Alternative Site #1 indicates that there would also be impacts to existing and future instrument procedures for Runways 27L and 36L. As Alternative Site #1 would result in additional navigational aid impacts compared to the Proposed Project and Alternative Site #2.

Part 77 Surface Impacts: The Siting Study included an evaluation of the existing and future Part 77 surfaces at the Airport to determine potential conflicts from the replacement ATCT at one of the three alternative sites. Alternative Site #1 would penetrate the Runway 9R-27L and Runway 18L-36R transitional surface. Alternative Site #2 would penetrate the Runway 9R-27L transitional surface. As Section 4 of this Focused EA describes, a replacement ATCT at the Proposed Project site would not cause impacts to Part 77 surfaces. Therefore, the alternative sites would result in more impacts to the Part 77 surfaces than the Proposed Project.

Site Access: As Section 6(2) of this Focused EA describes, both alternative sites are located in unused portions of the Airport. Therefore, construction of a replacement ATCT at either of the alternative locations requires the construction of an access road and parking area. A replacement ATCT at Alternative Site #1 would require the construction of approximately 2,400 linear feet of roadway from an existing Airport roadway. A replacement ATCT at Alternative Site #2 would require the construction of approximately 1,300 linear feet of roadway from an existing Airport roadway. The parking lot for either alternative site would be approximately 600 square feet. Additionally, a replacement ATCT at either alternative site would require extending utilities further because the sites are currently unused and there is little development in those portions of the Airport property. As Section 4 of this Focused EA describes, the replacement ATCT at the Proposed Project site would use the existing access road and parking lot and would require a shorter utilities extension given the existing development near the site. Therefore, Alternative Sites #1 and #2 would require more work and potentially result in more environmental impacts (e.g., construction impacts) than the Proposed Project.

<u>Tree Removal</u>: This analysis estimates the acreage of trees that would potentially need to be removed to provide a clear line-of-site from each alternative site to the existing and planned taxiway and runway ends. For ATCS to have a clear line-of-site to the airfield from Alternative Sites #1 and #2, the JAA would have to trim, top, or remove approximately 12 or 35 acres of trees, respectively. As Section 4 of this Focused EA describes, the JAA would have limited trimming, topping, or removal of trees within an approximately 7-acre area of Airport property for ATCS to have a clear line-of-site from the replacement ATCT. Therefore, a replacement ATCT at Alternative Site #1 or #2 would affect more trees, which could result in a greater environmental impact (e.g., habitat, wetlands, water quality) than the Proposed Project site.

Construction Cost Estimates: The Siting Study included a preliminary construction cost estimate for each alternative site. A replacement ATCT at Alternative Sites #1 or #2 would be more costly due to the greater height of the ATCT (i.e., requires the use of more materials), further extension of utilities, and greater acreage of tree trimming, topping, or removal. The preliminary construction cost estimates did not include estimates for the construction of an access road or parking lot. However, it can be inferred that the construction of an access road and parking lot for Alternative Sites #1 or #2 would further increase the cost of construction at those sites. Based on the preliminary estimates, a replacement ATCT at Alternative Sites #1 or #2 would be approximately \$3,000,000 more than the Proposed Project Site.

⁹ This analysis does not take into consideration the potential impacts from roadway and utility extensions because the design features have not been planned.



Compared to the Proposed Project site, a replacement ATCT at Alternative Sites #1 or #2 would result in greater impacts to the Airport's navigational aids and Part 77 surfaces, would require additional ground disturbing activities (i.e., construction of an access road and parking lot, modifying or removing of a greater amount of trees), and the JAA would incur additional construction costs. Although both alternative sites meet the JAA's Purpose and Need, the additional impacts result in both alternatives being impractical. Therefore, Alternatives #1 and #2 are not evaluated further in this Focused EA.

7. AFFECTED ENVIRONMENT

Describe the existing conditions in the project area and vicinity (land use and cover, terrain features, level of urbanization, biotic resources, sensitive populations and receptors, etc.). Discuss any actions taken or proposed by the community or citizen groups pertinent to the Proposed Project. If not already provided, attach a graphic and recent aerial of the area with the location(s) of the proposed action(s) identified.

Airport Overview: As described in Section 4 of this Focused EA, the Airport is located in Jacksonville, FL, which is within Duval County (see Figure 1). In the National Plan of Integrated Airport Systems, the FAA designates the Airport as a general aviation airport. The Airport encompasses approximately 6,100 acres and has four runways. Runway 18L-36R and Runway 18R-36L have a north/south alignment and Runways 9L-27R and 9R-27L have an east/west alignment. Runway 18L-36R, the primary runway, is 12,504 feet long by 200 feet wide; Runway 18R-36L is 8,003 feet long by 200 feet wide; Runway 9L-27R is 4,439 feet long by 200 feet wide; and Runway 9R-27L is 8,003 feet long and 200 feet wide. Airport facilities include an air traffic control tower (ATCT), fix-based operator and administration building, U.S. Coast Guard facilities, U.S. Army National Guard facilities, business aviation hangars, aviation maintenance facilities, and various aviation-related businesses.

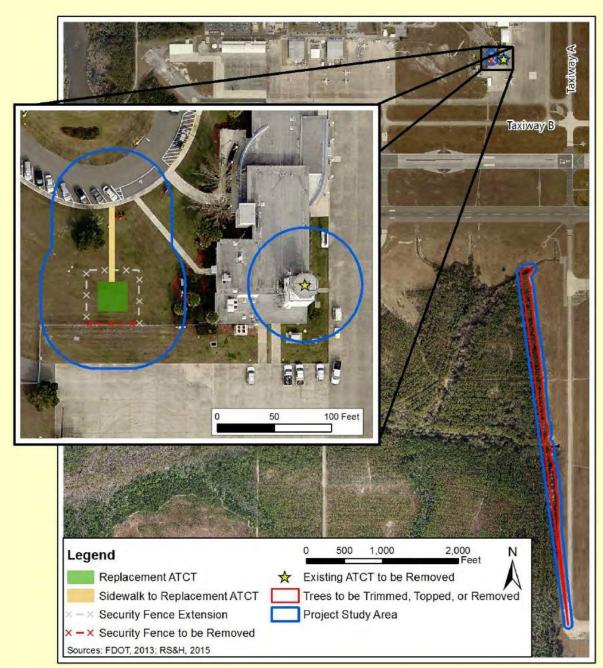
Land uses in the vicinity of the Airport are primarily rural or undeveloped. The City of Jacksonville (COJ) zoning for the Airport and the immediate vicinity is Planned Unit Development (PUD) zoning (COJ, 2015c). The COJ *Comprehensive Plan 2030, Future Land Use Element*, describes Cecil Commerce Center and Cecil Airport as a Multi-use Area, with a variety of land use categories, including but not limited to business park, industrial, recreation and open space, residential, commercial, and conservation area (COJ, 2015b). Branan Field Wildlife and Environmental Area, which is approximately 386 acres, is located directly south of the airport and is over two miles away from the project study area (FWC, 2015a).

Project Study Area: For this Focused EA, a project study area was established to characterize the existing conditions and areas of potential environmental impacts resulting from implementation of the Proposed Project. The total project study area is approximately 16 acres and encompasses the existing ATCT, the replacement ATCT site, and the seven acres of trees that may need to be removed or modified to meet line-of-sight criteria from the replacement ATCT to the south end of Taxiway A. For planning purposes, a conservative approach regarding potential line-of-sight obstructions due to trees is being used to evaluate potential impacts. At this time, the level of tree topping, trimming, or removal is uncertain (pending construction of the replacement ATCT). Therefore, for the purpose of this Focused **EA, the areas identified in the "tree removal area" are considered to be cleared with heavy** machinery. However, the JAA will work with the FAA and environmental permitting agencies to determine if trees that may interfere with ATCS line-of-sight can be hand trimmed and manually cleared (without disturbing the soil) in order to minimize potential effects.

As Figure 4 shows, the project study area is three separate areas. The two northern portions of the project study area vary between maintained, mowed areas or existing infrastructure (including parking areas, sidewalk, office building, aircraft ramp, and existing ATCT). The

southern portion of the project study area is primarily vegetated and does not include any man-made structures or infrastructure. The following paragraphs describe the existing environmental characteristics of the project study area.

Figure 4
Project Study Area



<u>Air Quality</u>: The United States Environmental Protection Agency (USEPA) identifies Duval County, and, therefore, the project study area, as an attainment area for all National Ambient Air Quality Standard (NAAQS) criteria for air pollutants (USPEA, 2015a).

<u>Coastal Resources</u>: Activities that would occur throughout the entire State of Florida are considered to be in or would affect the coastal zone. The COJ is located near the east coast of Florida. The project study area is approximately 30 miles west of the Atlantic Ocean. The



closest CBRS unit is approximately 30 miles southeast of the Proposed Project (USFWS, 2015a).

<u>Compatible Land Use</u>: As previously described, the Airport, and thereby the project study area, is zoned as PUD, with a future land use designation of a multi-use area. The closest residential area is approximately one mile northwest of the project study area.

<u>United States Department of Transportation Act: Section 4(f) and Land and Water</u>
<u>Conservation Fund Section 6(f) Resources</u>: The closest Section 4(f) resources to the project study area include Lake Fretwell Park and the Prisoner of War/Missing in Action Memorial Park, approximately ¾ mile west and northwest of the project study area, respectively (COJ, 2015b; RecreationParks.net, 2015). Branan Field Wildlife and Environmental Area, while directly south of the Airport, is over two miles south of the project study area (FWC, 2015a). The closest Section 6(f) resource, the Jacksonville-Baldwin Rail Trail, is approximately six miles west of the Proposed Project (COJ, 2015d).

<u>Farmlands</u>: The Natural Resource Conservation Service (NRCS) Web Soil Survey does not classify the land within the project study area as prime, unique, or state or locally important farmland (NRCS, 2015).

<u>Habitat for Protected Species</u>: Land use/land cover types within and near the project study area have been classified using the Florida Department of Transportation's (FDOT) Florida Land Use, Cover and Forms Classification System (FLUCFCS, 1999). The northern portion of the project study area is classified as FLUCFCS 8112 "General Aviation". The undeveloped portions of the northern project study area are uplands and maintained (mowed) grass areas. Grass species in the mowed areas are predominately bahiagrass (*Paspalum notatum*) and St. Augustine grass (*Stenotaphrum secundatum*), with scattered broadleaf weed species. Additional vegetation in the northern portion of the project study area includes red cedar (*Juniperus virginiana*), sabal palm (*Sabal palmetto*), and non-native landscape plants, which include Indian hawthorn (*Rhaphiolepis indicaand*) and Parson's juniper (*Juniperus spp.*).

The southern portion of the project study area has a variety of habitats, specifically pine flatwoods (FLUCFCS 411), upland cut ditches (FLUCFCS 511), wetland forested mixed (FLUCFCS 630), vegetated non-forested wetlands (FLUCFCS 640), and airports (FLUCFCS 811) habitat. The pine flatwoods community is dominated by slash pine (*Pinus elliottii*), loblolly pine (*Pinus taeda*), and longleaf pine (*Pinus palustris*). Due to periodic prescribed burns and timber management activities, the understory is relatively sparse and is comprised of saw palmetto (*Serenoa repens*), gallberry (*Ilex glabra*), and wax myrtle (*Myrica cerifera*).

The upland cut ditches in the southern portion of the project study area are man-made ditches that were constructed within historically upland habitats. The wetland forested mixed community contains a mixture of hardwood and coniferous species. Dominant vegetation includes bald cypress (*Taxodium distichum*), water oak (*Quercus nigra*), tupelo (*Nyssa sylvatica* var. *biflora*), red maple (*Acer rubrum*), and sweetbay (*Magnolia virginiana*). Ground cover in the wetland forested mixed community consists of Virginia chain fern (*Woodwardia virginica*), blue flag iris (*Iris virginica*), royal fern (*Osmunda regalis*), and cinnamon fern (*Osmunda cinnamomea*). A small portion of the project study area, approximately 0.01 acre, was identified as vegetated non-forested wetland. This portion of the airfield is maintained by periodical mowing, but is dominated by wetland vegetation such as beaksedges (*Rhynchospora* Spp.), yelloweyed grass (*Xris caroliniana*), and manyflower marshpennywort (*Hydrocotyle umbellate*). The airport community describes cleared and mowed open areas that surround runways and taxiways within the airport. Vegetation consists of bahiagrass (*Paspalum notatum*) and other associated pasture grasses.



The Airport has an active Wildlife Hazard Management program to enhance safe, efficient Airport operations. Such programs discourage wildlife from the airport operation area (AOA) and from utilizing structures on or near the AOA. As a result habitat attractive to wildlife that is hazardous to aviation is not encouraged within the project study area.

<u>Federally-Listed Species</u>: According to the United States Fish and Wildlife Service (USFWS), 14 federally-listed species have been documented to occur in Duval County (USFWS, 2015b). Of the 14 species, none were determined to have a high or moderate likelihood of occurrence in the project study area, and seven species were determined to have a low likelihood of occurrence within the area (see Attachment C). ¹⁰ No federally-listed species were observed within the project study area during a field reconnaissance in April and June of 2015.

<u>State-Listed Species</u>: According to the Florida Natural Areas Inventory (FNAI), there are 32 state-listed species that have been documented to occur in Duval County (FNAI, 2015). Of the 32 species, none were determined to have a high or moderate likelihood of occurrence and 23 species were determined to have a low likelihood of occurrence within the project study area (see Attachment C).¹¹

Other Protected Species: There is a potential for birds protected under the Migratory Bird Treaty Act (MBTA) to use the habitat in the project study area. Five species protected by the MBTA were observed within the northern portion of the project study area during field reconnaissance (see Attachment C). No species protected by the MBTA were observed in the heavily-wooded southern portion of the project study area during field reconnaissance. However, given the vegetation in the area, MBTA species may utilize the area.

In combination with the MBTA, the Bald and Golden Eagle Protection Act provides protection to the bald eagle (*Haliaeetus leucocephalus*). The closest active eagle nest (documented as last active in 2013) is over six miles west of the project study area, which is beyond regulatory limits for potential impacts to nesting sites (FWC, 2015b). ¹² Although bald eagles have been observed in the vicinity of the Airport, no bald eagles were observed during the field reconnaissance.

<u>Floodplains</u>: There are floodplains within the southern portion of the project study area (FEMA, 2015). The floodplains are along Sal Taylor Creek, which intersects the southern portion of the project study area.

<u>Hazardous Materials</u>: According to a visual inspection of the existing ATCT, there is ACM in the building. According to the USEPA, asbestos is a mineral fiber commonly used in a variety of building construction materials for insulation and as a fire retardant. Undisturbed asbestos and asbestos in a non-friable state within the building does not pose a risk to ATCS using the existing ATCT. Asbestos becomes hazardous if microscopic fibers become airborne and are inhaled into the lungs, which can cause significant health problems. This typically occurs when ACM are damaged or disturbed by repair, remodeling, or demolition activities.

Additionally, suspect LBP and potential PCB/mercury containing lighting fixtures and switches were identified in the existing ATCT. Similar to ACM, these materials do not pose a risk to ATCS when in good condition, but can become harmful when damaged or disturbed by repair, remodeling, or demolition activities.

¹⁰ Likelihood of occurrence is categorized as observed, high, moderate, low, or none. The likelihood of occurrence was determined through literature review, habitat requirements of species, and field reconnaissance in April 2015.

¹¹ Likelihood of occurrence is categorized as observed, high, moderate, low, or none. The likelihood of occurrence was determined through literature review, habitat requirements of species, and field reconnaissance in April 2015. No species were determined to have a moderate or high likelihood of occurrence.

¹² If an eagle nest is found within 660 feet of any proposed work, coordination with USFWS is required.



<u>Historical</u>, <u>Architectural</u>, <u>Archaeological</u>, <u>and Cultural Resources</u>: For the purpose of this Focused EA, the Area of Potential Effect (APE) consists of the existing ATCT footprint, the construction limits of the proposed replacement ATCT, and a 328-foot (100 meter) buffer around each of those elements. The APE also includes the southern portion of the project study area.

The 1998 Final Environmental Impact Statement, Disposal and Reuse of Naval Air Station Cecil Field, Jacksonville, Florida (1998 EIS) indicates there are no archaeological or cultural resources at the Airport (Department of the Navy, 1998). This EA references the 1998 EIS, and no new archaeological and cultural resource surveys were conducted for this Proposed Project.

To add to the information in the 1998 EIS, a Historic Architectural Resource Assessment (HARA) was conducted within the northern portion of the APE in March 2015. A HARA was not conducted for the southern portion of the APE because there has been no development in that area, and therefore, there are no historic architectural resources in that portion of the APE. The following resources were identified as potentially eligible for the National Register of Historic Places (NRHP) within the northern portion of the APE: the existing ATCT, the Cecil Airport Fire Station, and a Quonset hut.

Based on the HARA and 36 CFR 60.4 (NRHP Criteria for Evaluation), the three resources are examples of standardized military support facilities and lack architectural distinction or engineering merit. Additionally, background research did not reveal any information to indicate that these resources are closely associated with any specific activities, events, or persons significant within the context of the Airport. The three resources lack the architectural distinction and the significant historical associations necessary to be considered for listing in NRHP and are therefore ineligible for the NRHP. The Florida State Historic Preservation Officer (SHPO) confirmed the FAA's determination that the existing ATCT is not eligible for listing on the NRHP (See Attachment D, for coordination with the SHPO).

The closest NRHP-listed resource is the William Clarke Estate, approximately 10 miles southeast of the project study area (NPS, 2015a). According to the Florida Master Site File, the Westberry Griffs Homestead, approximately seven miles southwest of the project study area, is the closest NRHP-eligible resource (Florida Geographic Data Library, 2015). The HARA did not identify any existing or potential NRHP districts within, or intersecting, the APF.

See Attachment D for the HARA report and Attachment D for coordination with the SHPO.

Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks: The project study area is in U.S. Census Tract 12031017300. According to the USEPA's NEPAssist, approximately 14 percent of the Census Tract population are below the poverty level and approximately 15 percent of the Census Tract population are minorities (USEPA, 2015b). There are no schools, daycare centers, or other similar facilities within or adjacent to the project study area. The closest school to the project study area, Westview School, is approximately four miles northeast.

<u>Water Quality</u>: Sal Taylor Creek and two additional upland cut ditches, which intersect the southern portion of the project study area, are the only surface water features within the project study area. Ground water resources below the project study area include the surficial aquifer system, the intermediate aquifer system, and the Floridian aquifer system.

<u>Wetlands</u>: As the habitat portion of this section describes, there are wetlands within the southern portion of the project study area. These are forested mixed and vegetated nonforested wetland communities. Parts of the southern portion of the project study area are



within the boundaries of the JAA's approved Formal Jurisdictional Determination (St. Johns River Water Management District (SJRWMD) Permit #70452-71). The portion of the project study area that falls outside of the permitted area was field delineated by biologists.

<u>Wild and Scenic Rivers</u>: The closest Wild and Scenic River segment to the project study area is the Wekiva River, approximately 60 miles southeast of the project study area (NPS, 2015b).

8. ENVIRONMENTAL CONSEQUENCES - IMPACT CATEGORIES

Environmental Impact Categories (refer to corresponding sections in Appendix A of FAA Order 1050.1E and the FAA Airports Desk Reference for more information and direction). The analysis provided for each impact category below must comply with the requirements and significance thresholds as described in FAA Order 1050.1E and the FAA Airports Desk Reference. The Proposed Project and No Action alternative must be compared for each environmental impact category.

(1) AIR QUALITY

(a) Review whether the Proposed Project is located in an attainment, nonattainment, or maintenance area for any of the National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act. **Note:** To review the current list of areas designated nonattainment, see the U.S. Environmental Protection Agency reference book, The Green Book Nonattainment Areas for Criteria Pollutants at www.epa.gov/oagps001/greenbk/

If the Proposed Project is in an attainment area, identify below that it is "In Attainment Area" and go to (b). If the Proposed Project is in a nonattainment or maintenance area, **do not** complete this Form. Contact an ORL/ADO EPS for further direction.

As Section 7 of this Focused EA describes, Duval County is an attainment area for all criteria pollutants (USEPA, 2015a).

(b) Are the airport's current operational and/or enplanement activity levels <u>below</u> the FAA thresholds for requiring an air quality analysis? **Note:** For general aviation airports, total operations must be less than 180,000 general aviation and air taxi annual operations. For commercial service airports, total enplanements must be less than 1.3 million or there must be less than 180,000 general aviation and air taxi annual operations. If **YES**, document and go to Category (2) Coastal Resources. If **NO**, document and go to (c).

Document operational and/or enplanement activity levels:

According to the most recent FAA Terminal Area Forecast (TAF), the Airport had 95,794 operations (including military operations) and no enplanements in 2013 (FAA, 2015). The Airport's current operational and enplanement activities are below the FAA thresholds that require an air quality analysis.

(c) Compared to the No Action alternative, describe in detail below whether the Proposed Project <u>will or will not</u> change the **airport's** capacity or operational characteristics, such as increase or induce aircraft operations, increase ground service equipment (GSE), cause airfield congestion, move aircraft activity closer to sensitive populations or receptors, increase vehicular traffic to the airport or increase traffic at off airport intersections.

If the Proposed Project <u>will change</u> the airport's capacity or operational characteristics, regardless of whether it is in an attainment area, <u>do not</u> complete this Form and contact a FAA ORL/ADO EPS for further direction. If the Proposed Project is in an attainment area, and <u>will</u>



<u>not</u> **change the airport's** capacity or operational characteristics after providing an explanation, go to Category (2) Coastal Resources.

Explain:

The Proposed Project would not change the Airport's capacity or operational characteristics when compared to the No Action Alternative.

Note: If the level of annual enplanements exceeds 1,300,000 or the level of general aviation and air taxi activity exceeds 180,000 operations per year or a combination thereof, a NAAQS assessment may be considered after the Draft EA has been reviewed by .

(2) COASTAL RESOURCES

The Florida Department of Environmental Protection (DEP), Office of Intergovernmental Programs, Florida State Clearinghouse (FSC) coordinates a review of Federal actions under the following authorities: Presidential Executive Order 12372; Section 403.061 (42), Florida Statutes; Coastal Zone Management Act, 16 U.S.C. Sections 1451-1464, as amended; and, National Environmental Policy Act, 42 U.S.C. Sections 4321-4347, as amended.

(a) Is the Proposed Project consistent with the Enforceable Policies of the Florida's Coastal Management Program (CMP)? To make this determination, review the Florida Coastal Management Program Guide at http://www.dep.state.fl.us/cmp/default.htm

Discuss Proposed Project's consistency with Florida CMP Enforceable Policies.

Under the No Action Alternative, the JAA would not replace the ATCT and there would not be alterations to **the Airport's existing environs**, as related to the ATCT. Therefore, the No Action-Alternative would be consistent with FCMP.

The Proposed **Project would alter the Airport's environs** by creating new impervious surface (approximately 0.02 acre) and trimming, topping, or removing trees (over an approximately seven-acre area). However, given the minimal acreage that the Proposed Project would affect **when compared to the Airport's total area** (about 6,100 acres), this 0.12-percent change would not be significant. Additionally, the Proposed Project would be consistent with the enforceable policies of the Florida Coastal Management Program (FCMP) to the maximum extent practicable.

Coordination with the Florida Department of Environmental Protection (FDEP) indicates that the Proposed Project is consistent with the FCMP. The state will determine the final concurrence of the Proposed Project's consistency with the FCMP during the environmental permitting process, in accordance with Section 373.428, *Florida Statutes*, if applicable. See Attachment E-2 for the email from the FDEP, dated March 24, 2015, and Attachment F for the email from the FDEP, dated October 16, 2015.

(b) Is the location of the Proposed Project within the Coastal Barrier Resources System (CBRS), as delineated by the U.S. Fish and Wildlife Service (FWS) or Federal Emergency Management Agency (FEMA) coastal barrier maps?

Explain:

As Section 7 of this Focused EA describes, the project study area is not within and does not intersect a designated Coastal Barrier Resources System (CBRS) unit. The closest CBRS unit is approximately 30 miles southeast of the project study area (USFWS, 2015a).

Given the distance from the closest CBRS unit, neither the No Action Alternative nor the Proposed Action would affect CBRS units.

Note: Upon approval by the FAA ORL/ADO EPS, this completed Form must be submitted as a Draft Environmental Assessment (Draft EA) to the FSC for review and comment (See Section (13) Public Involvement for further information). The FSC's comment letter and enclosures must be attached to the Final EA submitted to the FAA ORL/ADO EPS. Also, prepare responses to any FSC agency comments received on the Draft EA to the Final EA.

(3) COMPATIBLE LAND USE

(a) Compared to the No Action alternative, would the Proposed Project result in significant noise impacts to non-compatible land uses? Cross-reference (or summarize) information from Category (13) Noise, addressing the Proposed Project's effects on compatible land uses as compared to the No Action alternative. Explain per Table 1 in 14 CFR Part 150, Airport Noise Compatibility Planning.

Note: Include a discussion of any local noise ordinances or zoning related to aircraft noise, and the airport's most recent Part 150 Study including noise compatibility plan, if applicable.

Explain:

Neither the No Action Alternative nor the Proposed Project would change the number or type of aircraft that utilize the Airport, or the manner in which aircraft operate at the Airport. Therefore, the No Action Alternative or **Proposed Project would not change the Airport's** aviation noise contours (see Section 8(13) of this Focused EA) and would not result in operationally-related noise effects to non-compatible land uses.

(b) Would the Proposed Project result in other (besides noise) impacts exceeding thresholds of significance that have land use ramifications, such as disruption of communities, relocation of residences or businesses, or impact natural resource areas? Refer to FAA Order 1050.1E and the FAA's Airports Desk Reference for thresholds of significance and cross-reference with Categories (14) Secondary (Induced) Impacts and (15) Socioeconomic, Environmental Justice, and Children's Environmental Health and Safety Risk

Explain:

The No Action Alternative would not have land use ramifications (e.g., disruption of communities, impact natural resource areas).

Similar to the No Action Alternative, the Proposed Project would not disrupt surrounding communities or require the relocation of residences or businesses (see Sections 8(14) and 8(15)(a) respectively). With regards to natural resources, the Proposed Project includes potential trimming, topping, or removal of trees within an approximately seven-acre area. However, the impacts to natural resources from the Proposed Project would not be significant.

Compared to the No Action Alternative, the Proposed Project would not result in significant impacts that have land use ramifications.

(c) Would the Proposed Project be located near or create a potential wildlife hazard as defined in FAA Advisory Circular 150/5200-33, "Wildlife Hazards on and Near Airports"?

Explain:

As Section 7 of this Focused EA describes, the portion of the project study area that is around the existing ATCT and proposed replacement ATCT is grassland that the JAA regularly mows and maintains to reduce wildlife hazards to aviation. The southern portion of the project study area is primarily wooded, with the exception of the area that falls within the AOA. This portion of the project study area contains wetlands, which are considered potential wildlife attractants.



Under the No Action Alternative, the JAA would not replace the ATCT and there would not be alternations to the Airport's existing environ, as related to the ATCT. The JAA would continue the regular maintenance of the area (e.g., mowing) and implementation of the Wildlife Hazard Management program.

As Section 4 of this Focused EA describes, the Proposed Project involves the trimming, topping, or removal of trees. The Proposed Project would not enhance wildlife's attraction to wetlands. The JAA would continue to monitor the project-affected area to determine if project-related tree cutting attracts hazardous wildlife. If it does, the JAA would modify its Wildlife Hazard Management program as necessary.

Compared to the No Action Alternative, the Proposed Project would not create additional wildlife hazards.

Note: FAA Advisory Circular 150/5200-33, "Wildlife Hazards on and Near Airports" provides guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports. It also discusses airport development projects (including airport construction, expansion, and renovation) affecting aircraft movement near hazardous wildlife attractants.

(4) CONSTRUCTION IMPACTS

Compared to the No Action alternative, would construction of the Proposed Project:

(a) Increase ambient noise levels due to equipment operation.

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT and construction activities related to the replacement of the ATCT would not occur. Therefore, the No Action Alternative would not increase ambient noise levels due to construction equipment operation.

The Proposed Project would include construction-related activities (e.g., demolition, clearing and grading). Noise generated by construction equipment would vary depending on the equipment type, model, operational mode, duration of operation, and the specific type of work in progress. Grading and scraping operations are the noisiest activities, with equipment noise levels as high as 70 to 90 dBA within 50 feet of the activities. However, noise levels would rapidly decrease as distance from these activities increases. Additionally, construction activities would be compliant with the COJ Environmental Protection Board, Rule 4, *Noise Pollution Control*. The closest noise sensitive land use (e.g., residential area) to the Proposed Project is approximately one mile northwest. Therefore, construction activities associated with the Proposed Project are not likely to significantly affect noise sensitive land uses.

Therefore, when compared to the No Action Alternative, construction of the Proposed Project would not significantly increase ambient noise levels.

(b) Degrade local air quality due to dust, equipment exhausts, and burning debris.

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT and construction activities related to the replacement of the ATCT would not occur. Therefore, the No Action Alternative would not degrade local air quality due to dust, equipment exhausts, and burning debris.



Construction of the Proposed Project has the potential to cause short-term effects on ambient air quality. Emissions, such as particulate dust emissions, would occur due to ground disturbing activities, motor vehicles accessing the construction site and traversing disturbed grounds, and direct emissions from construction equipment.

The selected contractor could use the following best management practices (BMPs) to reduce emissions from construction equipment:

- » regular maintenance of construction equipment;
- » prohibit construction vehicles from idling for longer than five minutes;
- » stabilize construction road entrances:
- » stabilize vehicle staging areas; and/or
- » allow construction vehicle parking only on paved areas.

Given the temporary nature of construction activities, the small extent of the Proposed Project (i.e., construction of a replacement ATCT having a 676-square-foot base and a height of 135 feet), and the use of BMPs, the construction of the Proposed Project is not anticipated to exceed the de minimus levels of criteria pollutants and would not affect Duval County's attainment status.

Compared to the No Action Alternative, the construction of the Proposed Project would not significantly degrade local air quality.

(c) Deteriorate water quality when erosion and pollutant runoff occur.

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT and construction activities related to the replacement of the ATCT would not occur. Therefore, the No Action Alternative would not deteriorate water quality when erosion and pollutant runoff occur.

Construction of the Proposed Project during the estimated 6 to 8-month long period has the potential to temporarily effect water quality. For example, rain events could result in stormwater runoff that could contain construction-related pollution. These pollutants could include sediments due to disturbing the approximately 0.5-acre area where ATCT-related construction and demolition would occur and the seven-acre area where tree modification would take place. In addition, pollutants due to leakages of fuels, lubricants, and fluids from construction equipment could also affect water quality during project construction and demolition.

To avoid significantly affecting water quality, the selected building contractor could use BMPs. Examples of those BMPs include the use of:

- » straw bale barriers;
- » silt fences;
- » sediment traps;
- » sandbag barriers; and/or
- » check dams.

Compared to the No Action Alternative, the construction of the Proposed Project would not significantly degrade water quality.

(d) Disrupt off-site and local traffic patterns?

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT and construction activities related to the replacement of the ATCT would not occur. Therefore, the No Action Alternative would not disrupt off-site and local traffic patterns.

Construction-related traffic could cause minor, localized traffic disruptions to 103rd Street, Aviation Avenue, and Simpson Way. The traffic disruption would be temporary, relatively minor, and would not permanently degrade the Levels of Service (LOS) on those roadways.

Compared to the No Action Alternative, the Proposed Project would not significantly disrupt off-site and local traffic patterns.

(5) DEPARTMENT OF TRANSPORTATION ACT: SECTION 4(f) AND LAND AND WATER CONSERVATION FUND SECTION 6(f) RESOURCES

Compared to the No Action alternative, would the Proposed Project have a:

(a) Direct impact (physical disturbance or "taking") or indirect impact (constructive use) on any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or an historic site of national, state, or local significance? If **YES**, **do not** complete this Form and contact the FAA ORL/ADO EPS.

Under the No Action Alternative, the JAA would not replace the ATCT and there would be no direct or indirect impacts to Section 4(f) resources.

The Proposed Project would not change the number or type of aircraft operations at the Airport. Therefore, the sizes and shapes of the Airport's aviation noise contours would not change.

Land disturbance associated with construction of the Proposed Project would occur entirely on Airport property and, consequently, no direct use of Section 4(f) resources would occur. Additionally, the Proposed Project's construction-related traffic would not affect air quality (Section 8(1)), noise (Section 8(13)), water quality (Section 8(16)), or the viewshed of the Airport (Section 8(11)) in a manner that would cause constructive use of Section 4(f) resources.

Therefore, when compared to the No Action Alternative, the Proposed Project would not directly or indirectly affect Section 4(f) resources.

(b) Direct impact or indirectly impact on any public park or recreation resources that has received a Federal Grant from the NPS Land and Water Conservation Fund (LWCF) for development or improvement? Review http://waso-lwcf.ncrc.nps.gov/public/index.cfm for a listing of recreation facilities. If **YES**, **do not** complete this Form and contact a FAA ORL/ADO EPS.

Under the No Action Alternative, the JAA would not replace the ATCT and there would be no direct or indirect impacts to Section 6(f) resources.

For the reasons described in Section 8(5)(a) of this Focused EA the Proposed Project would not directly or indirectly affect Section 6(f) resources.

Therefore, when compared to the No Action Alternative, the Proposed Project would not directly or indirectly affect Section 6(f) resources.



(6) FARMLAND--PRIME, UNIQUE OR STATE-SIGNIFICANT FARMLAND

(a) Compared to the No Action alternative, does the Proposed Project involve the acquisition of Prime, Unique or state or locally significant farmland, or the conversion/use of these types of farmlands that are protected by the Federal Farmland Protection Policy Act (FPPA)? Contact the Florida Natural Resources Conservation Service (NRCS). For more information see: http://www.fl.nrcs.usda.gov/contact/index.html

If YES, attach record of coordination with the Florida NRCS, including Form AD-1006.

Explain. Attach the NRCS Form AD 1006, Farmland Conversion Impact Rating, if applicable:

As Section 7 of this Focused EA describes, the Natural Resource Conservation Service (NRCS) Web Soil Survey does not classify the land within the project study area as prime farmland (NRCS, 2015).

Neither the No Action Alternative nor the Proposed Project would affect prime, unique, or state or locally significant farmland because there are no land classified as such within the project study area. Additionally, the No Action Alternative or Proposed Project would not involve the acquisition or use of any off-Airport lands.

Therefore, when compared to the No Action Alternative, the Proposed Project would not affect prime, unique, or state or locally significant farmland.

Note: Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land, but not land used for water storage or urban built-up land. The assessment is completed on Form AD-1006, Farmland Conversion Impact Rating.

(7) FISH, WILDLIFE, AND PLANTS

Compared to the No Action alternative, describe the potential of the Proposed Project to:

(a) Directly or indirectly impact plant communities and/or involve the displacement of wildlife. This answer should also cross reference Categories 16, Water Quality, and 17, Wetlands, if jurisdictional water bodies or wetlands are present.

Explain:

As Sections 7, 8(16), and 8(17) of this Focused EA describe, the habitat within the project study area consists of upland and wetland vegetation. The JAA discourages wildlife within the project study area through the JAA Wildlife Hazard Management program.

Under the No Action Alternative, the JAA would not replace the ATCT. The JAA would continue the regular maintenance of the area (e.g., mowing) and implementation of the Wildlife Hazard Management program. The No Action Alternative would not impact plant communities or involve the displacement of wildlife.

As Section 4 of this Focused EA describes, the Proposed Action would include the trimming, topping, or removing trees within an approximately seven-acre area to provide ATCS a clear line-of-sight from the replacement ATCT to the southern end of Taxiway A. Mid-canopy and groundcover vegetation in this area may also be altered or removed, depending on the type of removal activities in these area. Given the availability of similar habitats directly to the west of this area, the potential alteration of the habitat within the project study area is not considered significant.



Therefore, when compared to the No Action Alternative, the Proposed Project would not significantly affect plant communities or significantly displace wildlife.

(b) Potentially impact any Federally-listed or candidate species of flora or fauna, or impact designated critical habitat protected under the Endangered Species Act (ESA) or the Marine Mammal Protection Act (MMPA); or potentially impact Essential Fish Habitat identified under the Magnuson-Stevens Act? Attach records of consultation with U.S. Fish and Wildlife (FWS) and National Marine Fisheries Service (NMFS), as appropriate. If **YES**, **do not** complete this Form and contact a FAA ORL/ADO EPS.

Explain and attach records of consultation with FWS and NMFS, as appropriate:

As Section 7 of this Focused EA describes, there are seven federally-listed species with a low likelihood to occur within the project study area. Field reconnaissance, including a wildlife survey, was conducted within the project area and no observations or signs (burrows, nests, or tracks) of listed species were documented. No federally-listed species have been previously documented within the project study area. Additionally, there is no critical habitat within the project study area.

Under the No Action Alternative, the JAA would not replace the ATCT. The JAA would continue the regular maintenance of the area (e.g., mowing) and implementation of the Wildlife Hazard Management program. Therefore, the No Action Alternative would not impact federally protected species.

The Proposed Project would not adversely affect or significantly alter the habitat at the Airport or in the surrounding areas that protected species may use (see Section 8(7)(a) of this Focused EA). Therefore, a federal incidental take permit or mitigation is not anticipated to be required as part of the Proposed Project. The USFWS found that the Proposed Project may affect, but is not likely to adversely affect resources protected by the Endangered Species Act of 1973 (see Attachment F for the USFWS letter dated October 27, 2015).

When compared to the No Action Alternative, the Proposed Project would not significantly affect federally protected species.

(c) Potentially impact state listed species protected in the State of Florida? Explain, and attach records of consultation with state jurisdictional agencies (Florida Fish and Wildlife Commission (FWC) and Florida Department of Environmental Protection (DEP), as appropriate. Discuss mitigation required and permits as applicable.

Explain:

As Section 7 of this Focused EA describes, there are 23 state-listed species with a low likelihood of occurrence within the project study area. Field reconnaissance, including wildlife surveys, was conducted within the project area and no observations or signs (burrows, nests, or tracks) of listed species were documented. No state-listed species have been previously documented within the project study area. Additionally, the Florida Fish and Wildlife Conservation Commission (FWC) did not identify any listed species in the project study area (see Attachment E-2 for the FWC coordination letter dated April 21, 2015).

Under the No Action Alternative, the JAA would not replace the ATCT. The JAA would continue the regular maintenance of the area (e.g., mowing) and implementation of the Wildlife Hazard Management program. Therefore, the No Action Alternative would not impact state protected species.

The Proposed Project would not significantly alter the habitats at the Airport or in the surrounding areas that protected species may use (see Section 8(7)(a) of this Focused EA). Therefore, the Proposed Project is not anticipated to directly or indirectly impact state



protected species. No state wildlife permits or mitigation are anticipated to be required as part of the Proposed Project.

When compared to the No Action Alternative, the Proposed Project would not significantly impact state protected species.

(d) Affect species protected under the Migratory Bird Act? Attach record of consultation with FWS. If **YES**, contact an FAA ORL/ADO EPS.

Explain

As Section 7 of this Focused EA describes, species protected under the MBTA were observed within the project study area.

Under the No Action Alternative, the JAA would not replace the ATCT. The JAA would continue the regular maintenance of the area (e.g., mowing) and implementation of the Wildlife Hazard Management program. Therefore, the No Action Alternative would not impact species protected under the MBTA.

Prior to the start of ground disturbing activities associated with the Proposed Project, a nest survey would be conducted to ensure that there are no active avian nests within the construction limits. Should active avian nests be discovered, the JAA would coordinate with the appropriate agencies to determine the best steps to take to minimize potential effects (e.g., delay affecting trees, apply for a permit to take species protected by the MBTA). Therefore, the Proposed Project would not directly or indirectly impact species protected under the MBTA.

Compared to the No Action Alternative, the Proposed Project would not significantly affect species protected under the MBTA.

(e) If applicable, include a discussion of construction related impacts to these resources and discuss measures to reduce impacts.

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT and construction activities would not occur at the Airport as they relate to the replacement of the ATCT. Therefore, there would not be construction-related impacts to fish, wildlife, or plants.

The construction of the Proposed Project would impact the vegetation and common wildlife that use the vegetation within the project study area. Given the availability of similar habitats around the project study area, the construction associated with the Proposed Project is not anticipated to cause significant direct impacts to fish, wildlife, or plants.

Construction of the Proposed Project may result in temporary and minor impacts to air quality, noise, and water quality (see Section 8(4) of this Focused EA). Because these potential construction-related impacts would be temporary (from 6 to 8 months) and minor, and selected contractors would use BMPs, the Proposed Action would not cause significant indirect impacts to fish, wildlife, or plants.

Compared to the No Action Alternative, construction of the Proposed Project would not significantly impact fish, wildlife, or plants.

Note: Analyses for undisturbed areas including water bodies must be conducted in consultation with FWS, other Federal agencies (NMFS, EPA), and state agencies (DEP and water management districts), having expertise on affected biotic resources and their habitats.



Federal and state listed species lists must be consulted and the potential for occurrence in the project area must be documented. Include an analysis of construction impacts and measures to reduce impacts to ensure that this document properly addresses temporary, constructed-related impacts on these resources.

(8) FLOODPLAINS

(a) Compared to the No Action alternative, would the Proposed Project be located in, or would it encroach upon, any base/100-year floodplains, as designated by the Federal Emergency Management Agency (FEMA)? If **YES**, you must quantify the encroachment and attach the corresponding FEMA Flood Insurance Rate Map (FIRM) and proceed to (b) and (c). If **NO**, go to Category (9).

Explain and quantify the floodplain encroachment and attach FEMA FIRM if applicable:

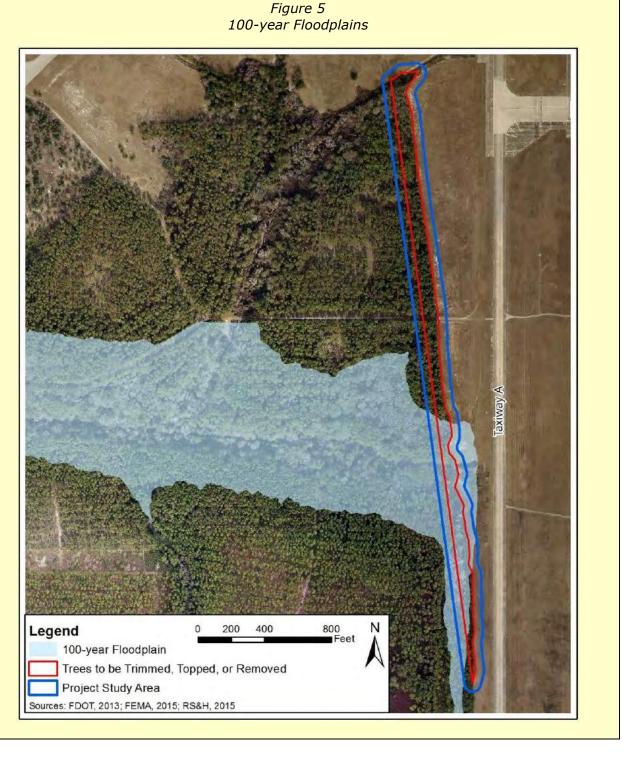
As Section 7 of this Focused EA describes, there are floodplains within the southern portion of the project study area.

Under the No Action Alternative, the JAA would not replace the ATCT and, therefore, would impact the 100-year floodplain.

As Section 4 of this Focused EA describes, the Proposed Project would include the trimming, topping, or removal of approximately seven acres of trees to allow for a clear line-of-sight from the replacement ATCT to the southern end of Taxiway A. At this time, the level of tree trimming, cutting, or removal is uncertain (pending construction of the replacement ATCT). Therefore, for the purpose of this Focused EA, the areas identified in the "tree removal area" are considered to be cleared with heavy machinery that may be considered direct impacts to floodplains. However, the JAA will work with the FAA and environmental permitting agencies to determine if trees that may interfere with ATCS line-of-sight can be hand trimmed and manually cleared (without disturbing the soil) in order to minimize potential effects of ground disturbing activities within the floodplain.

Based on a conservative Geographic Information System (GIS) analysis (i.e., assuming that all trees would be removed), approximately two acres of trees would be removed within the 100-year floodplain (see Figure 5). However, the Proposed Project does not include filling this area, and, consequently, the capacity and function of the 100-year floodplain would not be impacted. No project-related wood debris would be left in the area that could adversely affect flood flows.

When compared to the No Action Alternative, the Proposed Project would not affect the 100-year floodplain.



(b) If the Proposed Project would cause an encroachment of a base/100 -year floodplain, describe the measures to be taken to provide an opportunity for early public review during the EA process, in accordance with FAA Order 1050.1E, Appendix A, Section 9.2.c.

Early coordination for this Focused EA occurred with applicable federal, state, and local agencies (see Attachment E). With the public release of this Focused EA, the public is being afforded an opportunity to comment on this Focused EA during the 30-day public review period.

(c) In accordance with Executive Order 11988, provide the reasons why the Proposed Project must be located in or affect the base/100-year floodplain. Include (1) a description of significant facts considered in making the decision to locate in or affect the floodplain including alternative sites and actions; (2) a statement indicating whether the proposed action conforms to applicable state or local floodplain protection standards; (3) a description of the steps taken to design or modify the Proposed Project to minimize potential harm to or within the floodplain; and (4) a statement indicating how the proposed project affects the natural or beneficial values of the floodplain. Cross reference Category (17) Wetlands, as applicable.

Explain:

- (1) As described in Section 5 of this Focused EA, the existing ATCT has reached the end of its useful life and the JAA has a need to improve the functional and operational capabilities of the services provided by the ATCT. Section 6 of this Focused EA describes that the alternative locations considered for the proposed replacement ATCT. The alternative locations are not practicable because each, when compared to the Proposed Action, they would:
 - » result in greater impacts to the Airport's navigational aids and Part 77 surfaces;
 - » require additional ground disturbing activities (i.e., construction of an access road and parking lot, removing of a greater amounts of trees); and
 - » the JAA would incur about \$3 million in additional construction costs.
- (2) The Proposed Project does not involving filling activities in the 100-year floodplain or increasing impervious surface in the floodplain.
- (3) Complete avoidance of the 100-year floodplain is not achievable as Item 1 above describes. As Section 8(8)(a) of this Focused EA describes, the JAA will work with the FAA and environmental permitting agencies to determine if trees that may interfere with ATCS line-of-sight can be hand trimmed and manually cleared (without disturbing the soil) in order to minimize potential effects of ground disturbing activities within the floodplain.
- (4) The Proposed Project would not significantly affect the storage volume within the 100-year floodplain and would not increase the base flood elevation. Additionally, because there would be no filling in the area and all wood debris would be removed, the Proposed Project would not cause a significant encroachment or affect the natural or beneficial values of the floodplain.

(9) HAZARDOUS MATERIALS, POLLUTION PREVENTION, AND SOLID WASTE

(a) Compared to the No Action alternative, would the Proposed Project require the use of land that may contain hazardous substances or may be contaminated by hazardous materials? Explain your response and describe how such land was evaluated for hazardous substance contamination. Attach record of consultation with appropriate expertise agencies (e.g., US Environmental Protection Agency (EPA), Florida DEP and the results of electronic database searches.

Explain:

As Sections 5 and 7 of this Focused EA describe, there is ACM and suspect LBP and PCB/mercury containing light fixtures within the existing ATCT. These materials do not pose a risk to ATCS when in good condition, but can become harmful when damaged or disturbed.

Under the No Action Alternative, the JAA would not replace the ATCT. Therefore, potentially hazardous materials (when disturbed) would remain with the ATCT.



The Proposed Project includes the removal of the existing ATCT. The selected contractor would demolish the existing ATCT in accordance with Chapter 62-257 Florida Administrative Code, *Asbestos Program*, 40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, and the Occupational Safety and Health (OSHA) regulations regarding lead. The selected contractor could also use best management practices outlined in the FDEP's *Recommended Management Practices for the Removal of Hazardous Materials from Buildings Prior to Demolition* (FDEP, 1999) to properly handle and dispose of mercury and PCBs. The selected contractor would submit a demolition notification form to the appropriate FDEP District Office (Environmental Quality Division, 214 North Hogan Street, Suite 5000, Jacksonville, FL 32202) or local pollution control agency (FDEP, 2015).

When compared to the No Action Alternative, the Proposed Action includes the removal of hazardous materials from the existing ATCT. However, because the selected contractor would follow all demolition activities in accordance with applicable federal, state, and local rules and regulations, there would not be significant hazardous materials effects to the environment or any persons.

(b) Would the operation and/or construction of the project generate significant amounts of solid waste? If **YES**, are local disposal facilities capable of handling the additional volumes of waste resulting from the project? Attach a record of consultation with the waste management handling facility.

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT. Therefore, the No Action Alternative would not change the amount of solid waste associated with the ATCT.

The construction of the Proposed Project would cause a temporary increase in municipal solid waste (MSW) from the removal and disposal of the existing ATCT and the inorganic materials and vegetation removed during tree trimming, topping, or removal for the replacement ATCT. ¹³ The JAA will work with the FAA and environmental permitting agencies to determine if trees that may interfere with ATCS line-of-sight can be hand trimmed and manually cleared (without disturbing the soil). Some of the removed vegetation (e.g., trees) may be ground and used to mulch disturbed areas, sold as timber, or be reused, thereby decreasing the amount of waste produced.

The Trail Ridge Landfill, approximately 10.5 miles west of the Airport, covers approximately 977 acres and receives 2,500-3,000 tons of waste per day (Waste Management, 2015). The landfill is expected to have sufficient capacity to handle the solid waste produced as a result of construction of the Proposed Project.

The Proposed Project would not increase the amount of solid waste associated with the operation of an ATCT because it would not change the number of ATCS at the Airport.

When compared to the No Action Alternative, the construction and operation of the Proposed Project would not generate a significant amount of solid waste.

(c) Is there a sanitary landfill containing municipal solid waste (MSW) located within 10,000 feet of a runway serving turbo-powered aircraft, or 5,000 feet of a runway serving piston-powered aircraft? If **YES**, explain.

¹³ The trimming, topping, or removal of trees would occur after the replacement ATCT has been constructed and official line-of-sight surveys are conducted.



Explain:

There are no sanitary landfills containing MSW within 10,000 feet of the Airport's runways. The Trail Ridge Landfill, approximately 10.5 miles west of the Airport, is the closest landfill.

Note: A sanitary landfill containing municipal solid waste (MSW) is incompatible with airport operations if the landfill is located within 10,000 feet of a runway serving turbo-powered aircraft, or 5,000 feet of a runway serving piston-powered aircraft. Refer to FAA Advisory Circular 150/5200.33 " Hazardous Wildlife Attractants on or Near Airports," and FAA Order 5200.5B, "Guidance Concerning Sanitary Landfills on or Near Airports."

(10) HISTORICAL, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES

(a) Compared to the No Action alternative, would the Proposed Project result in a direct impact (physical disturbance or "taking") or indirect impact (increased noise, degraded air quality etc.) on any properties in or eligible for inclusion in the National Register of Historic Places (NRHP)? You must include records of consultation with the Florida State Historic Preservation Officer (SHPO) and Tribal Historic Preservation Officer (THPO). Cross reference your response with other applicable impact categories such as noise, compatible land use, air quality and Section 4(f) and 6(f) resources. If **YES**, coordinate with an FAA ORL/ADO EPS.

Explain:

As Section 7 of this Focused EA describes, the APE does not intersect any properties in or eligible for listing in the NRHP. The closest National Register of Historic Places (NRHP)-listed resource to the APE is the William Clarke Estate, approximately 10 miles southeast of the Proposed Project (NPS, 2015a). According to the Florida Master Site File, the Westberry Griffs Homestead, approximately seven miles southwest of the Proposed Project, is the closest NRHP-eligible resource (Florida Geographic Data Library, 2015).

Under the No Action Alternative, the JAA would not replace the ATCT and there would be no direct or indirect impacts to properties in or eligible for inclusion in the NRHP.

According to the SHPO, the existing ATCT is not eligible for listing on the NRHP (see Attachment D of this focused EA). As requested by the SHPO, the existing ATCT has been documented, including a completed Florida Master Site File Historic Structure Form, current archival quality photographs, and a location map. The Proposed Project would occur entirely on Airport property and would not result in significant environmental impacts (e.g., increased noise, degraded air quality), as described throughout this Focused EA, that could indirectly affect NRHP-listed or eligible properties.

Therefore, when compared to the No Action Alternative, the Proposed Project would not result in a direct or indirect impact to any NRHP-listed or eligible resources. The SHPO stated that the Proposed Project would not have an effect on historic properties (see Attachment D of this Focused EA).

(b) Describe whether there is reason to believe that significant scientific, prehistoric, historic, archeological, or paleontological resources would be lost or destroyed as a result of the Proposed Project. Include a record of consultation with persons or organizations with relevant expertise, including the SHPO and THPO, if applicable. If **YES**, coordinate with an FAA ORL/ADO EPS.

¹⁴ The current ATCT is over 50 years old, which is one of the criteria for listing on the NRHP.



Explain:

As Section 7 of this Focused EA describes, the *1998 Final Environmental Impact Statement for the Disposal and Reuse of Naval Air Station Cecil Field, Jacksonville, Florida* reported that there are no known archaeological sites at the Airport (U.S. Department of the Navy, 1998).

Under the No Action Alternative, the JAA would not replace the ATCT and there be no ground disturbing activities. Therefore, the No Action Alternative would not affect significant scientific, prehistoric, historic, archaeological, or paleontological resources.

The Proposed Project would include ground disturbing activities. However, based on previous research, ground disturbing activities are no likely to disturb significant scientific, prehistoric, historic, archeological, or paleontological resources.

If prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with Native American, early European, or American settlement are encountered at any time within the project study area, ground disturbing activities associated with the Proposed Project in the immediate vicinity of the discovery would stop immediately. The JAA would immediately contact the FAA and the SHPO and project activities would not resume without verbal and/or written FAA authorization. Additionally, in the event that unmarked human remains are encountered during construction of the Proposed Project, all work would stop immediately and the proper authorities would be notified in accordance with Section 872.05, *Florida Statutes*.

When compared to the No Action Alternative, the Proposed Project would not significantly impact scientific, prehistoric, historic, archeological, or paleontological resources. The SHPO stated that the Proposed Project is not likely to have an effect on unrecorded historic properties (see Attachment D of this Focused EA).

(11) LIGHT EMISSIONS AND VISUAL IMPACTS

(a) Compared to the No Action alternative, describe any new lighting systems associated with the Proposed Project(s). Would the Proposed Project have the potential for airport-related lighting impacts on nearby residential areas or other light-sensitive resources? Explain, and, if necessary, provide a graphic depicting the location of residential areas or other light-sensitive resources in the airport vicinity in relation to the **Proposed Project's new** lighting system.

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT and the lighting at the Airport would not change.

Although the proposed ATCT would be 57 feet taller than the existing ATCT, the lighting from proposed ATCT would be similar to that of the existing ATCT. Like the present ATCT, the Proposed Project would produce interior and exterior lighting that would be visible during dark hours (i.e., after sunset). Exterior lighting of the proposed replacement ATCT would be directional and focused for the safety of ATCS. Light emissions from the existing ATCT would be eliminated when the existing ATCT is demolished.

The closest light-sensitive resource (i.e., residential area) is approximately one mile northwest of the project study area. Although the proposed ATCT is 57 feet taller than the existing ATCT, the existing, dense, on-airport vegetation (e.g. trees and shrubs), roadways, and other Airport buildings would prevent significant lighting and visual effects on light-sensitive resources.



For the above reasons, the light emissions associated with the replacement ATCT and the removal of lighting associated with the existing ATCT are not anticipated to affect residential areas. When compared to the No Action Alternative, the Proposed Project would not significantly change light emissions from the Airport and would not have lighting-related impacts to light-sensitive resources.

(b) Identify whether a community or jurisdictional agency would consider visual effects from the proposed action objectionable to people's properties and people's use of properties, particularly those covered by Section 4(f), 6(f), and Section 106 of the National Historic Preservation Act (NHPA).

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT. Therefore, the No Action Alternative would not change the viewshed of the area.

The Proposed Project would change the viewshed of the area. For comparison purposes, the height of the existing ATCT is approximately 58 feet above ground level, not including the antennas and lightning rods. The replacement ATCT would be approximately 115 feet, not including antennas and lighting rods. However, the replacement ATCT would be consistent with the overall appearance of the Airport. Additionally, because the trees that may be trimmed, topped, or removed are located on the interior portion of the Airport property (compared to being located along local roads or residential properties), the modification to these trees will not change the viewshed or diminish the existing vegetative buffer. Given the presence of dense vegetation between the Airport and surrounding residential areas, it is unlikely that residential areas would have a direct view of the replacement ATCT from people's properties, or that the replacement ATCT would affect the use of Section 4(f), Section 6(f) properties, or adversely affect NRHP-listed or eligible properties.

When compared to the No Action Alternative, the Proposed Project would not cause visual effects.

(12) NATURAL RESOURCES, ENERGY SUPPLY, AND SUSTAINABLE DESIGN

(a) Compared to the No Action alternative, what effect would the Proposed Project have on energy supplies or other natural resource consumption? Would demand exceed supply? Explain. Letters from local public utilities and suppliers regarding their abilities to provide energy and resources needed for large projects may be necessary.

Explain:

Under the No Action Alternative, the JAA would not replace the ATCT. The existing ATCT would continue to operate under existing conditions. Therefore, the No Action Alternative would not affect energy supplies or the consumption of other natural resources.

The Proposed Project would not affect the number or type of aircraft operations at the Airport or the number of ATCS traveling to and from the Airport. The Proposed Project would not add a significant new source of energy consumption, particularly when taking into consideration that the existing ATCT would no longer be in use. Additionally, the replacement ATCT could be designed and equipped to operate in a more energy efficient way than the existing ATCT.

When compared to the No Action Alternative, the Proposed Project would not have a significant effect on energy supplies or natural resource consumption.

(b) Identify whether the Proposed Project would incorporate sustainable design features such as conservation of resources, use of pollution prevention measures, minimization of aesthetic effects, and address public (both local and traveling) sensitivity to these concerns.

Explain:

Construction of the Proposed Action would require the use of trucks and other construction equipment that consume common fuels and would include ground disturbing activities. The selected contractor may use sustainable measures when constructing the Proposed Project, including, but not limited to:

- » minimizing land disturbances to the maximum extent possible;
- » controlling stormwater runoff to minimize impacts to water quality; and/or
- » reducing criteria pollutant emissions resulting from construction activities.

Techniques to minimize land disturbances (i.e., soil stabilization) could include:

- » preserving existing vegetation;
- » mulching cleared vegetation and distributing mulch to disturbed areas to control erosion and runoff:
- » hydroseeding exposed soils;
- » distributing straw mulch; or
- » using geotextile mats.

Techniques to control stormwater runoff include installing:

- » straw bale barriers;
- » silt fences:
- » sediment traps;
- » sandbag barriers; or
- » check dams.

Techniques to reduce air quality affects from construction activities include:

- » regular maintenance of construction equipment;
- » prohibiting the idling of construction vehicles for longer than five minutes; and
- » stabilizing construction road entrances;

As Section 8(12)(a) of this Focused EA describes, the design phase of the replacement ATCT could include measures to have the building operate more energy efficiently. There may also be opportunities to reduce waste, recycle, and reuse materials from the existing ATCT. The Airport Cooperative Research Program (ACRP) Synthesis 10, *Airport Sustainability Practices*, and the Sustainable Aviation Guidance Alliance (SAGA) Database suggest sustainable design elements which the selected contractor could use for the design, construction, and operation of the Proposed Project.

(13) NOISE

(a) Does the Proposed Project require a noise analysis per FAA Order 1050.1E, Appendix A, Section 14 Noise, paragraph 14.6? Airport operations must be below the threshold for both existing and forecast years. If **YES**, document airport operations and coordinate with the ORL/ADO EPS <u>before</u> beginning the noise analysis. If **NO**, document airport operations and go to Category 14, Secondary (Induced) Impacts.



Note: No noise analysis is needed for proposals involving Design Group I and II airplanes (wingspans less than 79 feet) in Approach Categories A through D (landing speed less than 166 knots) operating at airports whose forecast operations in the period covered by the EA do not exceed 90,000 annual operations (247 average daily operations) or 700 jet operations (2 average daily operations). No noise analysis is needed for proposals involving existing heliports or airports whose forecast helicopter operations in the period covered by the EA do not exceed 10 annual daily average operations with hover times not exceeding 2 minutes. Forecasts must be consistent with the most recent FAA' Terminal Area Forecast (TAF).

Document current annual operations and forecast operations in the period covered by the EA.

According to the most recent FAA TAF, the Airport had 95,794 operations (including military operations) and no enplanements in 2013 (FAA, 2015).

Neither the No Action Alternative nor Proposed Project would alter the number or types of aircraft operating at, or forecast to operate at, the Airport. Therefore, a noise analysis assessing aircraft operations is not required as part of this Focused EA.

When compared to the No Action Alternative, the Proposed Project would not change the Airport's aviation noise contours.

- **(b)** If required, prepare a noise analysis that documents and compares:
 - Existing conditions
 - Opening year No Action conditions
 - Opening year Proposed Project conditions
 - Future year No Action (normally 5 years beyond project implementation) conditions
 - Future year Proposed Project conditions

Noise contour sets for the DNL 65, 70 and 75 dB contours must be depicted on base maps that show the existing airport, the proposed project, and the vicinity of the airport. The base maps must identify noise sensitive uses **and other land uses within the project's noise impact area**.

Explain

Not applicable. See Section 13(a)

(c) For each set of noise contours prepared in (b), discuss and document in noise exposure data tables: the number of residences or people within each noise contour at or above the DNL 65 dB; and, the number of noise sensitive uses (e.g., schools, churches, hospitals, parks, recreation areas) within each noise contour at or above the DNL 65 dB.

Explain:

Not applicable. See Section 13(a).

(d) Discuss whether there is a significant noise impact for the Proposed Project compared to the No Action, for the project opening year and future year.

If there is a significant impact, discuss mitigation measures that would reduce significant noise impacts below threshold levels. Discuss the Airport Sponsor's binding commitments to carry out those measures within its authority.

Note: A significant noise impact would occur when there is an increase of at least 1.5 dB over noise sensitive areas for the Proposed Project compared to the No Action, for the same time frames. Discuss any local noise ordinances or zoning related to aircraft noise. Cross reference



your response with Categories 3, Compatible Land Use; 5, Section 4(f); and 10, Historical/Archaeological.

Explain:

Not applicable. See Section 13(a)

(e) Discuss whether the Proposed Project has the potential to cause surface transportation noise impacts e.g. new, expanded or re-aligned airports access roads, increased auto or truck activity; increased vehicle speeds, or other surface-transportation related actions.

Explain:

Not applicable. See Section 13(a)

(14) SECONDARY (INDUCED) IMPACTS

(a) When compared to the No Action alternative, would the Proposed Project cause induced, secondary, or socioeconomic impacts to surrounding communities, such as change business and economic activity in a community; impact public service demands; induce shifts in population movement and growth, or other factors identified by the public, etc.? If **YES**, describe how these impacts would be minimized or mitigated.

Explain:

Under the No Action Alternative, JAA would not replace the ATCT. The existing ATCT would continue to operate under existing conditions. Therefore, the No Action Alternative would not cause induced, secondary, or socioeconomic impacts to surrounding communities.

The operation of the Proposed Project would not permanently alter the number of ATCS, or other employees, at the Airport. Additionally, the Proposed Project would not affect other Airport operations.

Construction of the Proposed Project would temporarily alter the vehicular traffic using roads near the Airport and increase the number of people working (i.e., construction workers) there, but the resultant effects would not adversely affect the local business or economic activities, public service demands, or induce shifts in population movement and growth.

When compared to the No Action Alternative, the Proposed Project would not cause induced, secondary, or socioeconomic effects to the surrounding community.

(15) SOCIOECONOMIC IMPACTS, ENVIRONMENTAL JUSTICE, AND CHILDREN'S ENVIRONMENTAL HEALTH AND SAFETY RISKS

When compared to the No Action alternative, would the Proposed Project:

(a) Result in the need to relocate any homes or businesses? If **YES**, contact the ORL/ADO EPS for further guidance before completing this Form.

Explain:

The No Action Alternative and Proposed Action would not require the acquisition of off Airport property.

Therefore, Neither the No Action Alternative nor the Proposed Project would result in the need to relocated any homes or businesses.

(b) Cause an alteration in surface traffic patterns, or cause a noticeable increase in surface traffic congestion or a decrease in Level of Service (LOS) on local roadways?



Explain:

Neither the No Action Alternative nor the Proposed Project would change the number of ATCS working at the replacement ATCT. Additionally, the ATCS would use the same roadways to access the existing or replacement ATCT. Therefore, the No Action Alternative or Proposed Project would not alter surface traffic patterns.

When compared to the No Action Alternative, the Proposed Project would not alter surface traffic patterns, increase surface traffic congestion, or decrease the LOS of local roadways (e.g., Simpson Way, Aviation Avenue, 103rd Street).

(c) Would the Proposed Project impact minority and/or low-income populations? Human health, social, economic, and environmental issues must be considered in your evaluation. *See FAA Airports Desk Reference, Chapter 10 Environmental Justice for guidance*. If **YES**, contact the ORL/ADO EPS for before completing this Form.

Explain:

As Section 7 of this Focused EA describes, the project study area is in U.S. Census Tract 12031017300. According to the USEPA's NEPAssist, approximately 14 percent of the Census Tract population are below the poverty level and approximately 15 percent of the Census Tract population are minorities (USEPA, 2015b).

Under the No Action Alternative, the JAA would not replace the existing ATCT and there would be no environmental impacts to minority and/or low-income populations.

The Proposed Project's permanent effects (e.g., increase in impervious surface) would occur entirely on Airport property, an area that does not encompass residential areas. Environmental effects that are not confined to the project study area (e.g., temporary air quality effects from construction activities) would not result in disproportionate adverse effects to the low-income or minority population within the Census Tract.

When compared to the No Action Alternative, the Proposed Project would not significantly affect low-income or minority populations.

(d) Would the Proposed Project result in any environmental health risks and/or safety risks that may disproportionately affect children, in accordance with Order 1050.1E Appendix A, Section 16.2b? If **YES**, contact the ORL/ADO EPS for before completing this Form.

Explain:

There are no schools, daycare centers, or other similar facilities within or adjacent to the project study area. The closest school to the project study area, Westview School, is approximately four miles northeast.

Under the No Action Alternative, the JAA would not replace the ATCT and the operational characteristics of the Airport would not change. Therefore, the No Action Alternative would not result in any environmental health or safety risks that may disproportionately affect children.

Similar to the No Action Alternative, the Proposed Project would not change the operational characteristics of the Airport. Additionally, the Proposed Project would not affect products or substances that a child may touch, digest, or be exposed to. Therefore, the Proposed Project would not disproportionately affect the environmental health or safety of children.

When compared to the No Action Alternative, the Proposed Project would not result in environmental health risks or safety risks that would disproportionately affect children.

(16) WATER QUALITY

(a) When compared to the No Action alternative, will the Proposed Project require a water quality certificate (WQC) for construction activities or impacts to navigable waters, including jurisdictional wetlands? Explain the status of and/or any issues associated with obtaining this certificate. Attach any correspondence from the issuing agency. Cross reference your response with Category (17) Wetlands, if applicable.

Explain:

As Section 7 of this Focused EA describes, there are surface waters (i.e., Sal Taylor Creek, upland cut ditches) and wetlands within the southern portion of the project study area.

Under the No Action Alternative, the JAA would not replace the ATCT and there would be no ground disturbing activities. Therefore, the No Action Alternative would not affect water quality.

As Section 4 of this Focused EA describes, the Proposed Project would include the trimming, topping, or removal of approximately seven acres of trees to allow for a clear line-of-sight from the replacement ATCT to the southern end of Taxiway A. This area intersects three upland cut ditches, including a portion of Sal Taylor Creek (which also includes wetlands). Soil disturbance due to the trimming, topping, or removal of trees may temporarily affect surface water quality by increasing sedimentation turbidity, which would affect water quality. Using a conservative estimate (i.e., removing all trees within the seven-acre area), there would be a direct impact to approximately 0.15 acre of upland cut ditches (see Table 1 and Figure 6). However, when final line-of-sight calculations are prepared, the JAA will work with the FAA and environmental permitting agencies to determine if obstruction trees can be hand trimmed, manually cleared (without disturbing the soil), or whether tree trimming and/or removal can be limited to upland areas to avoid and/or minimize water quality and wetland impacts.

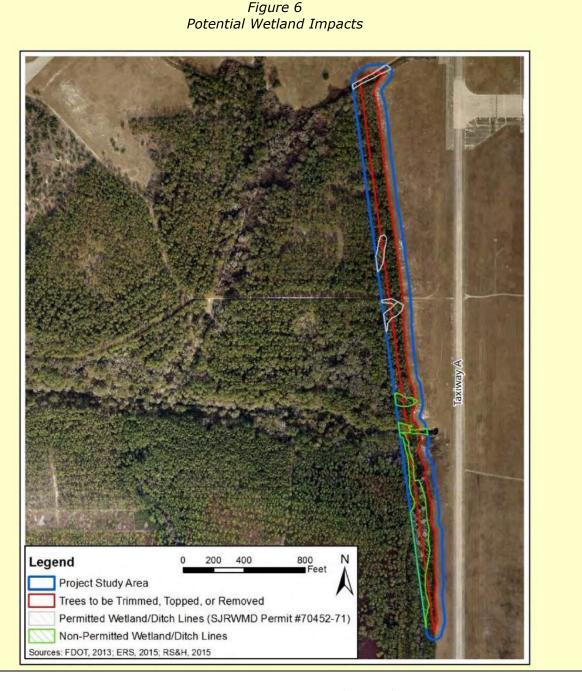
Table 1 Potential Wetland and Upland Cut Ditch Impacts

FLUCFCS Code	Description	Acres	
511	Upland Cut Ditches	0.15	
Total Impact - Upland Cut Ditch			
630	Wetland Forested Mixed	0.75	
640	Vegetated Non-Forested Wetlands	0.01	
Total Impact - Wetlands			

Source: ERS, 2015

As Section 8(16)(b) of this Focused EA describes, the JAA would obtain an NPDES construction permit, which would require the JAA to obtain a water quality certificate (WQC). Additionally, should heavy equipment be required for the modification of trees, and the selected contractor does not agree to operate machinery on USACE-approved mat (in order to minimize ground disturbance), the JAA will apply for a Clean Water Act Section 404 Permit because the USACE considers the movement of the equipment not on mats a dredge or fill activity. The Section 404 Permit also requires the JAA to obtain a WQC.

When compared to the No Action Alternative, the Proposed Project would not significantly affect water quality. Additionally, the use of BMPs and adherence to provisions of applicable permits throughout construction activities, as Section 8(16)(b) of this Focused EA describes, would minimize potential affects to water quality.



(b) Is a National Pollutant Discharge Elimination System (NPDES) permit required for the Proposed Project? If **YES**, explain the status and attach any comments received from the issuing agency or a copy of the permit.

Explain:

The JAA would obtain a National Pollutant Discharge Elimination System (NPDES) construction permit, which would include BMPs to avoid and minimize potential effects to surface waters. The JAA would ensure that the Proposed Project is covered under the Airport's existing NPDES permit for industrial activities. The JAA would also obtain an Environmental Resource Permit (ERP) from the SJRWMD to address potential water quality and wetland impacts of the Proposed Project. The selected contractor would conduct all construction-related activities associated with the Proposed Project in accordance with the applicable permits, rules, and regulations in order to minimize potential impacts to water quality and wetlands.



(c) Would the Proposed Project affect a public drinking water supply, a sole source aquifer, or a Comprehensive State Groundwater Protection Program (CSGWPP)? If **YES**, attach records of consultation with EPA and state, local or tribal water quality agencies responsible for protection programs.

Explain:

The Proposed Project would not affect a public drinking water supply or sole source aquifer.

(d) Provide sufficient description of the mitigation measures the Airport Sponsor will carry out for the Proposed Project to: meet WQC terms or the conditions of any applicable NPDES permits; protect public drinking water supplies or comply with applicable CSGWPPs; develop oil response plans to contain any potential spills of oil or oil-based products associated with the Proposed Project; meet any other substantial water quality concerns that water quality agencies identify; or, use best management practices (BMPs) or best available technologies (BATs).

The JAA would carry out the applicable provisions and BMPs set forth in the NPDES construction permit and ERP, which the JAA would obtain prior to the start of construction of the Proposed Project. As previously described, the exact quantity of trees that would need to be trimmed, topped, or removed to allow for a clear line-of-sight is not known at this time (this Focused EA includes a conservative analysis). When final line-of-sight calculations are prepared, the JAA will work with the FAA and environmental permitting agencies to determine if obstruction trees can be hand trimmed, manually cleared (without disturbing the soil), or whether tree trimming and/or removal can be limited to upland areas to avoid and/or minimize water quality and wetland impacts.

(17) WETLANDS

(a) Compared to the No Action alternative, would the Proposed Project impact Federal or state jurisdictional or non-jurisdictional wetlands? If **YES**, provide an assessment of the Proposed Project's wetland impacts: identify both acreage and functional loss in accordance with U.S. Army Corps of Engineers (USACE) and state agency (water management district (WMD) or Florida Department of Environmental Protection (DEP) requirements. If protected species or habitat resources are affected, USFWS and FWC must be consulted and consultation must be attached. Cross-reference with Category (7) Fish Wildlife and Plants, as applicable. If **NO**, go to Category 18).

Explain:

As Section 7 of this Focused EA describes, the project study area includes upland habitat, surface waters, and wetlands.

Under the No Action Alternative, the JAA would not replace the ATCT and there would be no ground disturbing activities. Therefore, the No Action Alternative would not affect wetlands.

As Sections 4 and 8(16) of this Focused EA describe, trees within the project study area may need to be trimmed, topped, or removed to allow for a clear line-of-sight. For planning purposes, a conservative approach regarding potential line-of-sight obstructions is being used to evaluate potential wetland impacts. At this time, the level of tree trimming, cutting, or removal is uncertain (pending final design of the replacement ATCT). Therefore, for the purpose of this Focused EA, the areas identified in the "tree removal area" are considered to be cleared with heavy machinery that may be considered direct impacts to wetlands (see Figure 6). Under this conservative scenario, there is a potential for 0.76 acre of direct wetland impacts and 0.15 acre of direct impacts to upland cut ditches (see Table 1).



When compared to the No Action Alternative, the Proposed Project would not significantly impact wetlands.

(b) If the Proposed Project would affect wetlands and there is no practicable alternative, describe all practical means employed to avoid and minimize wetland impacts due to the placement of fill materials, dredging, stormwater runoff, construction, sedimentation, land use, or other reason.

Note: The alternatives analysis must discuss why there is no reasonable/practicable alternative to the Proposed Project.

Explain:

As Section 5 of this Focused EA describes, the existing ATCT has reached the end of its useful life and the JAA has a need to improve the functional and operational capabilities of the services provided by the ATCT. Section 6 of this Focused EA describes that the alternative sites considered for the proposed replacement ATCT would result in greater impacts to the Airport's navigational aids and Part 77 surfaces, would require additional ground disturbing activities (i.e., construction of an access road and parking lot, removing a greater amount of trees), and the JAA would incur additional construction costs compared to the Proposed Project site.

As described throughout this Focused EA, for planning purposes and a conservative analysis, it is assumed that heavy machinery would be used to modify trees that cause a line-of-sight issue for ATCSs at the replacement ATCT. However, when final line-of-sight calculations are prepared, the airport will work with the FAA and environmental permitting agencies to determine if obstruction trees can be hand trimmed, manually cleared (without disturbing the soil), or whether tree trimming and/or removal can be limited to upland areas to avoid and/or minimize wetland impacts.

(c) Provide a detailed description of proposed mitigation. Include location of proposed mitigation, acreage and functional gain, and estimated cost. USACE or state agency consultation must be attached.

Explain:

If mitigation is necessary for wetland impacts associated with the removal of line-of-sight obstructions by heavy equipment, the JAA will work with the FAA and permitting agencies to complete all required mitigation. Mitigation would likely occur on airport property within the existing permitted mitigation area.

(d) Identify the type of permit that will be obtained for wetland impacts [WMD, DEP, USACE Section 404, or local] Identify whether the project qualifies for a USACE Nationwide General Permit or a USACE Standard Individual Permit. Attach WMD, DEP or USACE consultation.

Explain:

If there are direct impacts to wetlands associated with the use of heavy machinery for modifying trees within the project study area, an individual or nationwide permit from the USACE and an individual permit from SJRWMD may be required (see Section 8(16)(b). However, when final line-of-sight calculations are prepared, the airport will work with the FAA and environmental permitting agencies to determine if obstruction trees can be hand trimmed, manually cleared (without disturbing the soil), or whether tree trimming and/or removal can be limited to upland areas to avoid and/or minimize wetland impacts.

Note: Nationwide General Permits authorize a category of activities throughout the U.S., Puerto Rico, and U.S. Virgin Islands that are similar in nature and cause only minimal individual and cumulative environmental impacts. General Nationwide Permits may authorize



minor filling, roads, utility lines, maintenance of existing structures and other minor activities; they may require mitigation.

Note: Standard Individual Permits are required for activities which may cause more than minimal adverse effects to the aquatic environment and exceed the terms and conditions of a general permit; they require public notice and review by state and federal resource agencies; most require mitigation.

(f) Attach a statement from the airport sponsor committing to the implementation of a mitigation plan developed to the satisfaction of the USACE in consultation with state and local agencies having an interest in the affected wetland.

The JAA is committed to obtaining all environmental permits and, if necessary, providing appropriate mitigation to implement the proposed project. Once final information is obtained on line-of-sight obstructions, the JAA will coordinate with the FAA and state and federal agencies, as required.

(18) WILD AND SCENIC RIVERS

(a) Is the Proposed Project within ¼ mile from the ordinary high water mark on each side of a Wild and Scenic River System (WSRS) river, a Study river, or a river listed on the National Rivers Inventory (NRI)? See Note below. If **YES**, contact an FAA ORL/ADO EPS.

Explain

The project study area is not within ¼ mile from the ordinary high water mark on either side of a Wild and Scenic River System, a Study river, or a river listed on the Nationwide Rivers Inventory.

Therefore, neither the No Action Alternative nor the Proposed Project would not affect a Wild and Scenic River System, a Study river, or a river on the Nationwide Rivers Inventory.

Note: Florida has two rivers designated as wild and scenic in accordance with the Wild and Scenic Rivers Act; the Loxahatchee River in southeast Florida, and the Wekiva River in central Florida: http://www.rivers.gov/rivers/florida.php Florida rivers listed on the NRI can be found at the following website: http://www.nps.gov/ncrc/programs/rtca/nri/index.html

9. OTHER CONSIDERATIONS

(a) Is the Proposed Project likely to be highly controversial on environmental grounds?

Explain:

As Section 8 of this Focused EA describes, the Proposed Project would not have any significant environmental impacts or off-airport changes, and it would not alter the operational characteristics of the Airport. Therefore, the Proposed Project is not considered to be highly controversial on environmental grounds.

(b) Is the Proposed Project likely to be inconsistent with any Federal, state, or local law or administrative determination relating to the environment?

Explain:

The Proposed Project would be consistent with the objects of federal, state, and local plans or policies as they relate to the environment.



(c) Is the Proposed Project reasonably consistent with plans, goals, policies, or controls that have been adopted for the area in which the airport is located?

Explain:

The Proposed Project is reasonably consistent with the plans, goals, polices, and controls of the City of Jacksonville.

10. PERMITS

List all required permits for the Proposed Project. Discuss coordination with appropriate agencies and the expected time frame for receiving identified permits. Indicate whether any difficulties are anticipated in obtaining required permits.

The JAA would obtain an ERP permit from the SJRWMD prior to the start of ground disturbing activities. Based on coordination with the SJRWMD, the JAA should not have difficulties obtaining this permit (see Attachment E-2 for the early coordination letter from the SJRWMD). The JAA would also obtain an NPDES construction permit. Based on previous permitting efforts, obtaining an NPDES construction permit is not likely to be difficult.

Note: Even though the Airport Sponsor has/shall obtain one or more permits from the appropriate Federal, state, and/or local agencies for the proposed project, initiation of any construction activities shall **NOT** begin until the FAA has issued its environmental determination.

11. MITIGATION

(a) Summarize all mitigation measures discussed in Environmental Impact Categories (1) through (18) of this Form that will be taken to avoid creation of significant impacts to a particular resource as a result of the Proposed Project. Discuss any impacts that cannot be mitigated, or that cannot be mitigated below the threshold of significance. Significant impact thresholds are provided in FAA Orders 1050.1E Appendix A for each resource impact category and in 5050.4B Table 7-1.

The Proposed Project would not significantly affect any of the resources evaluated in this Focused EA. However, the JAA and the selected construction contractor would use measures to minimize and mitigate the unavoidable, minor impacts to environmental resources. The following sections of this Focused EA provide the BMPs and mitigation measures associated with the Proposed Project:

- Section 8(4)(a): Construction activities would comply with COJ Environmental Protection Board, Rule 4, Noise Pollution Control.
- Section 8(4)(b): The selected contractor would use BMPs, such as the regular maintenance of construction equipment, to reduce potential air quality impacts from construction.
- Section 8(4)(c): The selected contractor would use BMPs, such as the use of straw bale barriers and silt fences, to reduce construction related pollutants in stormwater runoff.
- » Section 8(8)(c): Tree trimming, topping, or removal activities would conform to applicable state and local floodplain protection standards.
- » Section 8(9)(a): Demolition activities involving hazardous materials (i.e., demolition of the existing ATCT) would be conducted in accordance with applicable federal, state, and local rules and regulations.
- » Section 8(10)(b): In the unlikely event that prehistoric or historic artifacts, or unmarked human remain, are encountered during ground disturbing activities, the



- selected contractor would stop all work in the immediately and the JAA would contact the FAA, SHPO, and other appropriate authorities.
- Section 8(12)(b): Sustainable design elements in ACRP Synthesis 10 and the SAGA database could be used in the replacement ATCT.
- Section 8(16)(a) and (d): The selected contractor would comply with applicable permit provision (e.g., NPDES construction permit, Section 404 Permit, ERP) to reduce potential impacts to water quality.
- » Section 8(17)(c) and (d): The JAA will work with the FAA and permitting agencies to complete all required mitigation for potential wetland impacts and obtain the appropriate permits (e.g., USACE individual or nationwide permit), if necessary. The selected contractor would comply with the permit authorizing work in wetlands.

12. CUMULATIVE IMPACTS

Cumulative impacts are impacts that a proposed action would have on a particular resource when added to impacts on that resource from past, present, and reasonably foreseeable future actions undertaken or proposed by the Airport Sponsor, the FAA, other Federal, state or local agencies, or a private entity.

(a) In order to determine whether the Proposed Project would have a cumulative effect on any of the environmental impact categories discussed in Categories 1 - 18, identify any projects <u>on-airport</u> that are connected to the Proposed Project and/or that may have common timing and/or location. Also, identify any projects in the vicinity that are located <u>off-airport</u> and <u>outside of the Airport Sponsor or FAA's jurisdiction</u>. For both on- and off-airport projects, generally use 3 years for past projects and 5 years for future foreseeable projects.

Note: List all sources of information including projects shown on an airport's ALP or identified in an airport's master plan, on airport projects approved by the FAA, the airport's 5 year CIP, the local jurisdiction's approved land use map and long range transportation plan, and substantial locally approved development projects. Identify off-airport projects that are within the same political jurisdiction or within 5 miles of the airport, and the existing and future 65 DNL noise contour. For wetland and biotic resource impacts consider water management district basin boundaries.

Explain:

For this Focused EA, spatial boundaries were delineated to determine the areas and projects within those areas that the cumulative analysis would address. The spatial boundary for this cumulative analysis is the Airport property. Projects described in the following paragraphs include those that had or have the potential to affect the same environmental resources that the Proposed Project would affect.

Projects that have occurred at the Airport in the last three years include:

- » construction of a 30,000-square foot corporate maintenance, repair, and overhaul (MRO) hangar on the northwest side of the Airport;
- » construction of a 131,000-square foot MRO hangar on the northwest side of the Airport;
- » construction of a 15,000-square foot fixed base operator (FBO) hangar on the northwest side of the Airport;
- » construction of a 14,500-square foot hangar, including office space, on the northwest side of the Airport;
- » improvements to Airport's airfield drainage; and
- » improvements to the Airport's wildlife/perimeter/security fence.



Projects that are currently occurring at the Airport include:

» construction of on-Airport airside (extension of Taxiway E1 and a portion of E), landside (proposed aviation hangars), and surface transportation improvements (Approach Road Phase 1) in the northwest and northeast quadrants of the Airport property.

Projects that are anticipated to occur at the Airport within the next five years include:

- » construction of Approach Road Phase 2 associated with future aviation development in the northeast portion of the Airport;
- » construction of spaceport-related support facilities (e.g., hangar, apron, taxiway, liquid fuel storage area, visitor center); and
- » removal of Runway 9L-27R pavement associated with the runway's threshold displacement.
- **(b)** Consider the impacts of the Proposed Project together with the projects discussed in 12(a) above and discuss whether any of the cumulative impacts would exceed a significant impact threshold where one is provided. If no threshold is provided, discuss whether potential cumulative impacts would be considered substantial by any Federal, state, or local agency, or the public. Significant impact thresholds are provided in FAA Orders 1050.1E Appendix A and in 5050.4B Table 7-1 for each resource category.

Explain:

When evaluated with regard to past, present, and reasonably foreseeable projects, the Proposed Project would not cause significant environmental impacts. Proposed BMPs, design elements, and permit requirements would reduce unavoidable, temporary construction-related air quality and water quality impacts, and long-term wetland impacts.

Therefore, the Proposed Project would not result in a significant cumulative impact to any environmental category listed in FAA Order 1050.1F.¹⁵

13. PUBLIC INVOLVEMENT

(a) Discuss whether any public meetings were held during development of the EA. Describe what efforts have been or will be made to notify the public of the availability of the Draft EA for public review. Discuss whether a public hearing is required or warranted, or required to satisfy the requirements of special purpose laws (see FAA Order 5050.4B paragraphs 402 and 403).

The Draft Focused EA was made available for agency and public review and comment for 30 days from the date of publication of the Notice of Availability (see Attachment F). Copies of the Draft Focused EA were available for review and comment during normal business hours at Cecil Airport's administrative offices, 13365 Simpson Way, Jacksonville, FL 32221, and the Jacksonville Public Library Argyle Branch, 7973 Old Middleburg Road South, Jacksonville, FL 32222. No comments were received from the public regarding the Draft Focused EA.

Note: Upon approval by the FAA ORL/ADO EPS, this completed Form must be issued as a Draft EA by the Airport Sponsor for a minimum 30-day agency and public review period. Notices of the availability of the Draft EA must be published in the local newspaper and on the sponsor's website, if available.

Certain special purpose environmental laws, regulations, or executive orders require public notice, and must be included as part of the Draft EA notice of availability. These include but

¹⁵ Note: Since the FAA Orlando ADO issued this Focused EA form, the FAA has issued 1050.1F, which became effective on July 16, 2015. Therefore, this Focused EA cites 1050.1F.



are not limited to section 2(1)(4) of E.O. 11988, Floodplain Management, section 2(b) of E.O. 11990, Protection of Wetlands, Section 7 of the Endangered Species Act, Section 106 of the National Historic Preservation Act, and Order DOT 5610.2, Environmental Justice. Copies of the Draft EA must be submitted to the Florida State Clearinghouse, and to local and Federal agencies as determined by the FAA ORL/ADO EPS.

(b) Provide a list of all agencies and persons consulted in the preparation of this Form.

Attachment D provides the Section 106 consultation package and agency/tribal responses. Attachment E provides the early coordination package and agency responses for this Focused EA. The following list identifies the agencies and tribes contacted during the preparation of this Focused EA:

- » USEPA
- » USFWS
- » FEMA
- » U.S. Department of the Interior
- » USDA
- » USACE
- » NOAA-NMFS
- » FDEP (Clearinghouse)
- » FWC
- » FNAI
- » Duval County/City of Jacksonville
- » SJRWMD
- » Florida SHPO
- » Miccosukee Tribe of Indians of Florida
- » Muscogee (Creek) Nation
- » Poarch Band of Creek Indians
- » Seminole Tribe of Florida
- » Seminole Nation of Oklahoma

14. LIST ALL ATTACHMENTS TO THIS FORM

Attachment A - Existing Condition Evaluation

Attachment B - Excerpts from the ATCT Siting Study

Attachment C - Protected Species in Duval County

Attachment D - Section 106 Consultation

Attachment E - Early Coordination

Attachment F - Agency and Public Review of the Draft Focused EA



15. PREPARER CERTIFICATION

I certify that the information I have provided above is, to the best of my knowledge, true and correct.

Signature:

Name, Title: David Alberts, Project Manager

Affiliation: RS&H, Inc.

Date: November 30, 2015

Phone Number: (904) 256-2500

Email: <u>David.Alberts@rsandh.com</u>

16. AIRPORT SPONSOR CERTIFICATION

I certify that the information I have provided above is, to the best of my knowledge, true and correct. I also recognize and agree that no construction activity, including but not limited to site preparation, demolition, or land disturbance, shall proceed for the above proposed project(s) until FAA issues a final environmental decision for the proposed project(s), and until compliance with all other applicable FAA approval actions (e.g., ALP approval, airspace approval, grant approval) has occurred and all appropriate Federal, state and local permits and certifications have been obtained.

Signature:

Name, Title: Kelly Dollarhide, Airport Manager

Affiliation: Cecil Airport, Jacksonville Aviation Authority

Date: 11/30/15

Phone Number: (904) 573-1604

kelly.dollarhide@cecilairport.com

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ATTACHMENT A

CECIL ATCT EXISTING CONDITION EVALUATION





AIR TRAFFIC CONTROL TOWER EXISTING CONDITION EVALUATION

January 18, 2013

Prepared by

Michael Baker, Jr., Inc.
700 Huger Street | Columbia, SC 29201
Phone: (803) 254-2211 | www.mbakercorp.com





INTRODUCTION

The purpose of this assessment is to evaluate the existing physical conditions of the Air Traffic Control Tower, located as a part of Building 82, at Cecil Airport. This report includes a general assessment of the facility age and condition, identification of conditions that may require rehabilitation, replacement and/or improvement, and identification of areas deficient in compliance with current Building and Life Safety codes. All assessment notes are based upon visual observation. No destructive testing, material sampling, soils testing, or other methods were utilized.

Specifically, the assessment effort consisted of:

- 1. Review of the existing archived building drawings as made available by the Jacksonville Aviation Authority (JAA);
- 2. Site visit made on September 6, 2012 to visually inspect and photograph the existing conditions and systems;
- 3. Preparation of this evaluation report outlining significant architectural, structural, mechanical, electrical and plumbing conditions and general compliance with current Florida Building and Life Safety Code (2010);
- 4. As part of this assessment, a visual inspection identifying asbestos, lead paint and PCB suspect containing materials was conducted. This survey did NOT include any testing of materials.

The following items are specifically excluded from the scope of this report:

- A. Evaluation of Specialty Systems, including ATCT Operations and Systems;
- B. Civil Site Assessments, Geotechnical Surveys, detailed Structural Evaluation and Calculations Assessment and review of local Planning and Zoning requirements;
- C. Consideration of Improvements, Design of Improvements, Alternatives, etc.;
- D. Coordination and Review of conditions found with local authorities having jurisdiction;
- E. Development of Rough Order of Magnitude Cost Opinion to implement improvements to fix deficiencies identified.

TOWER DESCRIPTION

Cecil Airport was originally constructed in the early 1940's as a Naval Auxiliary Air Station in preparation for World War II. The Airport became a Naval Air Station in the 1950's and operated as such until announced for closure as part of the Base Realignment and Closure Commission in the early 1990's. In 1999, the Airport was transferred from the U.S. Navy to the Jacksonville Port Authority (now the Jacksonville Aviation Authority) and operates today as a General Aviation airport.

The ATCT is part of an existing structure identified as Building 82. The building was constructed in the early 1950's. The main building is a two story structure of approximately 12,000 SF per each floor, not including the ATCT itself. The building currently houses the JAA



Cecil Airport administrative offices. Other tenants of the building include Jacksonville Jetport, the airport's fixed base operator, and Robinson Aviation, Inc. (RVA), the aviation services company contracted to operate and staff the air traffic control tower (the ATCT is operated as a Federal Contract Tower). Building 82 is situated near the crossing of the airports runway system. Existing hangar facilities are located directly north of the building. The airports ARFF building is located directly southwest of the building. The ATCT is located on the southeast corner of the structure.

The tower is a five level tower. The top of the tower cab is approximately 58 feet from surrounding pavement grade, which places the cab floor approximately 48 feet above grade. The tower structure itself is approximately 20' x 20' square. The basement level is accessed from the exterior and consists of two excavated areas and a small electrical vault area. There is an interior stairway that provides vertical access, egress to the exterior and connects to the remainder of Building 82 at the first floor and second floor levels. The stairway reaches from the first floor level up to the fourth floor level. A vertical ship type stair proceeds from the fourth level into the cab control room level. The exterior of the cab is reached thru a small scuttle midway up the ships ladder. A wall mounted exterior metal ladder provides access from the cab walk to the cab roof level.

Multiple renovation and rehabilitation projects on the structure have been undertaken over the course of its 60 years, as it suffers from many condition, location and functional problems. The most recent projects were undertaken by The LPA Group. In 2008, a minor temporary maintenance rehabilitation project was completed to improve certain fixtures and finishes within the tower and to improve the condition of casework within the tower cab. This work included new paint and stair treads in the existing stairway, new fixtures and finishes within the existing toilet room, including a new thru-wall HVAC unit and some sheetrock to cover existing exposed piping and conduit. Work also included replacement of two (of the eight) tower cab glass panels and new finishes within the tower cab. New cabinets were installed within the tower cab to better fit current systems and equipment. The project included removal of abandoned in-place wiring and conduit. Some abandoned HVAC ducts were removed and a new thru wall unit added to improve temperature and humidity control in the data room. While this effort improved certain cosmetic conditions, the project did not provide structural, major mechanical, electrical or form improvements to the ATCT and did not increase the size of the ATCT spaces to better fit current operational equipment and needs.

An elevator addition to Building 82 was constructed in 2009 that reaches from the main floor level to the second floor level of the Authority's administration offices. The elevator does not connect directly to the air traffic control tower and does not provide direct access to its floor levels. The tower remains accessible only by the original stairwell.

EXISTING CONDITIONS AND ISSUES ASSESSMENT

The tower is constructed of poured in place load bearing exterior concrete walls. The tower cab appears as a standard pre-fabricated structure anchored in place on top of the tower. Most interior walls are load bearing concrete. Floor levels are constructed with concrete filled steel decking. The general condition of the concrete structure appears to be good and is consistent with a 60 year old structure.



Portions of the basement area and the exterior communication vault suffer from water intrusion and, at the time of the visit, were approximately 2/3 filled with water. Cyclical or permanent exposure to water would subject the steel reinforcing to deterioration and deterioration of the integrity of the reinforcing can be assumed to have occurred. Steel at the exterior cab level is moderate to severally rusting and continues to show levels of deterioration consistent with a 60 year old structure.

The 2010 Florida Building Code is the current life safety and building code in application. Wind speed design requirements for structural resistance have greatly increased from the date this tower was constructed. It can be assumed that the lateral resistance of the structure does not meet current code requirements. See Appendix A: <u>Structural Assessment Report</u> by CASE Consulting dated September 26, 2012.

Air Traffic Control Tower cabs are not normally required to fully comply with the requirements of the Americans with Disabilities Act (ADA) due to the physical requirements of the job. An egress stair is present from the level below the cab. An existing ship type stair provides access between this level and the cab level. Ship type stairs are permitted under the Florida Building Code; however, the existing stair is steep, does not provide the full minimum width and may exceed the maximum allowable slope (rise/run). A safety gate should be installed at the top of the stair to prevent falls but none is present. The Florida Building Code does not make additional exception for this stair and it could be determined that a major renovation would be required to fully install a Chapter 10 compliant stair into the cab. The rise/run, width and landings in the main stairwell are compliant. The existing handrail, however, is 32 inches above the floor and does not comply with the 34 inch minimum. The existing handrails do not return to the wall nor do they provide the required handrail extensions. A guard rail should be provided at the top of the stair in lieu of the hand rail provided.

An elevator is not required in this tower, due to size and the height of the cab floor. It should be noted that an elevator is typically provided and required when the cab floor is 50 feet above grade or higher. The existing floor level is just below this requirement. During the review, it was noted that the tower currently has line of sight issues and does not provide a complete view of the airfield. As future development occurs on the east side of the airport, it was mentioned that this area may be difficult to see. It would be our recommendation, as part of an ATCT Site Location Study, to fully evaluate the line of sight condition for the existing tower. If the tower cab is required to be at a higher elevation to meet current airfield operational needs, an elevator should then also be provided. Reconstructing the tower to accommodate a higher cab, and the addition of an elevator, would require substantial modifications to the existing structure to accommodate. Full compliance with current accessibility codes would also be an anticipated requirement.

The tower does not have room for all spaces that may be typically required to support operations. A single office space is provided in Building 82 adjacent to the tower. Break room and locker functions are shared in the mechanical space on the fourth floor adjacent to the restroom. There are no meeting and training spaces. Communications shares space with mechanical on the 3rd floor and should be separated. There is a lack of separate locker facilities and no shower facility. The existing unisex restroom was recently rehabilitated in terms of finishes and fixtures;



however, the restroom does not meet current accessibility codes for door clearance and approach, interior space turnaround and fixture access requirements. A single unisex fixture should meet building code occupancy requirements for air traffic control towers.

The tower cab glazing (8 total panels) has been replaced at different times and is inconsistent in appearance. Glass in the tower cab suffers from perimeter seals that are in poor condition and allow condensation to develop. The steel window frames are in poor condition and show extensive signs of rusting. Some frame fasteners are missing.

The exterior cab walkway steel guardrails, cab roof access ladder, window frames, slab edge form angles are in moderate to poor condition. The railing on top of the cab is only 36 inches in height and does not meet the current code requirements for a guard rail. Steel components show aggressive rusting and paint is in poor condition. Sealant at exterior penetrations for cabling is inconsistent in placement and condition and requires rehabilitation. Access around the cab catwalk is obstructed due to poor cable routing. Visual inspection of the roof surface condition indicates a roof in bad to poor condition and requires resurfacing or replacement. Destructive testing to determine the condition of the roof components (insulation, decking) was not conducted. Current tower standards would prefer an interior ladder for roof access. Standards also suggest the use of raised flooring to allow for flexibility and ease of access for systems infrastructure. The current tower does not have raised flooring. Exterior paint condition of the tower is good. Exterior metal condition is poor. Interior paint condition in the stairwell is good. Paint condition in the support rooms is poor.

While not a military structure, the current structure would not meet the minimum Department of Defense antiterrorism and force protection requirements. Also, few security and access control measures are provided to limit access to the building and the tower. The only access control present is on the door leading into the cab proper and on the doors leading into to the communications room located on the first floor.

Light fixtures and devices are missing guards, globes, covers and are in generally poor condition. Switches and outlets are painted over and condition is bad to poor. An existing light fixture blocks an exit sign. Emergency lighting in the stairwell is questionable. Light levels in the stairwell do not meet code minimums. Tactile exits signs required by code are missing.

By code, the tower is required to be separated from the remainder of Building 82 but it is not. The administrative space on the second and first floors of Building 82 are indicated with egress through the tower stairwell. The existing stairway shaft is required to be fire rated and smoke proof but the existing condition is not. Penetrations through the shaft are not fire sealed, dampered or protected. Doors into the shaft are not fire rated and labeled. Doors lites contain wire glass which should be removed and replaced with code compliant fire rated glazing. Door hardware is not consistent. Egress panic bars are not installed. The current building code and tower standards require the tower to be sprinklered and have a standpipe. Neither of these systems is in place in its current condition. A fire extinguisher is present in the cab but extinguishers are not present at all occupied floors and equipment rooms. Current building code requires an automatic smoke detection system that activates an occupant notification system. This system is not present in the tower. Smoke and heat evacuation from the stairway is required and accomplished by mechanical or natural ventilation. Minimum air discharge requirements are



not currently met.

Mechanical system components vary in age and efficiency but most are older and likely suffer from condition issues and performance inefficiency due to age and controls. Testing was not performed to determine the extents of emergency generator power backup provided for tower systems.

Access and clearance at electrical equipment and telephone boards is restricted and in some cases inadequate. Certain penetrations thru floor are not fire rated and protected. Cabling is not identified nor separated from other voltage and network cabling. Some cabling is not protected nor supported. Covers on devices and raceways are missing. Abandoned cables remain and should be removed. The Information Technology room is not fire rated and separated from the remainder of the building. Sprinkler and/or clean agent extinguishing systems are required but not provided. Grounding and insulating of metals and enclosures is deficient. Water heater is missing expansion relief and auxiliary drain pan. Mechanical equipment and ductwork protrude below code required head room clearance requirements. Lighting is inconsistent and under sized. Exit lights are missing from some spaces. High mast antennae are missing required guy wires to withstand wind speeds required by current Florida Building Code. Tower control room cab is missing emergency ventilation system. For a detailed description of existing mechanical, plumbing and electrical conditions, refer to the attached Appendix B: Draft Mechanical, Electrical and Plumbing findings by Eng Engineering dated October 29, 2012.

A visual inspection for potentially hazardous materials was conducted as part of this evaluation. Suspect asbestos containing materials (ACM) were potentially identified in numerous areas including in existing thermal insulations, duct mastic, roof mastics and pitch pockets, mechanical dampers, etc. Certain pipe insulations contain ACM and already bear labels indicating such. Suspect lead based paints (LBP) were potentially identified on wall and ceiling locations, ductwork, pipe and pipe insulations, interior rails and stairs, exterior metal doors, railings and ladders, etc. It is considered highly likely that over the course of the buildings 60 years, multiple layers of paint have been applied over older lead based paint layers. Paint on certain areas of ductwork is peeling and in poor condition. Exterior paint on metal surfaces is flaking, chalking and peeling, especially in areas of extreme rust, and in poor condition. In addition, potential polychlorinated biphenyls (PCB) or mercury containing lighting fixtures and switches were identified. See Appendix C: Visual Existing Conditions Survey by Aerostar SES, LLC dated September 17, 2012.

SUMMARY

In summary, the condition of the existing ATCT is consistent with that of a 60 year structure. Exterior systems are showing advanced signs of deterioration. Many interior building systems are outdated and outmoded. The building code requirements for structure, systems, life safety, accessibility, etc. have evolved and increased since this building was first constructed and many components now fall short. A summary table of systems and conditions follows. See Appendix D for additional condition photos.

Operational aspects of the ATCT were not reviewed during the course of this report; however, it can be noted that the cab and other spaces are likely undersized to support the current systems



and technology needs. It could also be recommended that a more detailed study be conducted to confirm location, sight lines and other operational parameters to determine adequacy as growth and development on the airfield evolves.

Building System/Component	Good Condition	Adequate Condition	Poor Condition	Does Not Exist
Age			X	
Life Safety/Egress		X		
Accessibility			X	
Foundation			X	
Structure		X		
Interior Finishes		X		
Functional Spaces			X	
Glazing Systems			X	
Exterior Rails, Ladders, etc.			X	
Roof			X	
Access Control/Security			X	
Lighting			X	
Fire Separation			X	
Fire Sprinkler/Smoke Detection				X
Mechanical Systems			X	
Electrical Systems			X	
Hazardous Materials ¹			X	

Notes:

1. Presence of hazardous materials confirmed where labeled and others likely present based on visual inspection only.

APPRENDIX A

Structural Assessment Report

Case Consulting



CASE Consulting

840 Shull Street, Suite 210 West Columbia, South Carolina 29169

Bus: 803.926.1600 Fax: 803.926.1610

September 26, 2012

Mr. J. Robert Moore II THE LPA GROUP INCORPORATED 700 Huger Street Columbia, South Carolina 29201

Re: Cecil Airport - Building 82: Air Traffic Control Tower Cursory Structural Assessment Report

Dear Mr. Moore:

As requested CASE Consulting, Inc. (CASE) visited the Air Traffic Control Tower associated with Building 82 on September 6, 2012. Several engineers and testing firm personnel were on site together, along with yourself and Larry Elkins of the LPA Group to perform the field work for the assessment. Cecil Airport personnel provided access to all areas necessary for review, including access into the Control Tower Operations cab. The site assessment was based on observations of selected locations of the readily visible and accessible structural elements of the building. No destructive tests or material sampling were performed nor were soils and finishes removed at the time of the visit. The assessment is limited to the tower portion of the building and does not include an assessment of any other structures that may adjoin or connect to the tower.

The objective of the cursory structural assessment is to inform the client of potential structural deficiencies, observations of deterioration and comment on the wind/seismic integrity of the structure. From the information reported within the cursory structural assessment, opinions of mitigation strategies for rehabilitation to improve the lateral resisting system may be requested at a later date. Opinions for mitigation strategies are beyond the scope of service of this assessment.

GENERAL EXISTING CONDITIONS

The building was constructed around 1952 according to the record information on file provided by Cecil Airport. It does not appear that any major renovations have occurred to the main structural framing and load bearing wall systems of the tower portion of Building 82. Refer to the series of photos below for a general representation of the existing conditions.

The original building was composed of load bearing concrete walls with a painted exterior finish system. The tower had a basement level and four floor levels before ascending into the cab portion of the building. A full height stair that provided access to the fourth level occupied a portion of each level's footprint. Emergency equipment, heating and air conditioning equipment, instrumentation, and electronics were programmed within the remainder of the floor space for each level. The cab appeared to be a prefabricated unit that was set and anchored on top of the wall system of the concrete framed structure. There were a couple of partition type walls to separate spaces such as the toilet area, however most walls within the tower served as bearing elements.

STRUCTURAL DEFICIENCIES AND DETERIORATION

Structurally, the Air Traffic Control Tower of Building 82 appears to be in fair condition and few structural deficiencies were observed for the gravity load carrying systems. The majority of the deterioration of the structure appeared to be the result of general use of the facility and age. The basement area was noted to have standing water which was report to be normal for the space. Constant exposure to water that fluctuates during the cyclical, seasonal changes would expose the reinforcing steel of the walls to rusting. There did not appear to be any spalling of concrete or exposed reinforcing steel; however the water condition has likely affected the integrity of the reinforcing steel at the basement level. The remainder of the concrete structure appeared to be in good condition showing few signs of deterioration. The level of deterioration increased at the cab level. The rusting of the support system for the railings and the rusting of the steel around the cab windows indicates that detrimental deterioration from water exposure has occurred and continues to negatively affect the structural system.

WIND / SEISMIC ASSESSMENT

The structural elements of the lateral resisting system of ATCT Building 82 were field determined (visually) during the site visit. General conditions, sizes and configurations were determined to form the basis of our assessment; formal calculations are outside the scope of this report.

The current 2010 Florida State Building Code continues to have Seismic design considerations as a "Reserved" status due to the very low risk of the region for seismic activity. However, the wind loading criteria and classifications of building according to their occupancy category has dramatically changed in recent code editions. Ultimate Design Wind Speeds for the Jacksonville area have increase to between 130 -140 mph for an essential facility like a control tower. Since construction occurred in the early 1950's it is unlikely that design for lateral resistance was considered, but there is some lateral resistance inherent in load bearing concrete wall structures. Based on the existing conditions it can be inferred that some lateral could be transferred through the exterior walls, but not enough to meet modern code requirements.

CONCLUSION

Based on field observations of the ATCT of Building 82, the gravity load resisting elements appear to be in fair condition and few significant structural deficiencies were observed. Some deterioration of the structure was identified that is most likely the result of general use of the facility and age. The unknown level of rusting of the reinforcing at the base of the wall systems and the rusting associated with the cab supports and railing system would be of greatest concern. Given the load bearing concrete structure type and the structures resistance to historical hurricane events, there would be some inherent lateral force resistance capabilities. However the resistance would fall short of the requirements established in the current 2010 Florida State Building Code.

Please feel free to call if additional information or clarification is necessary.

Sincerely,

CASE Consulting, Inc.

Albert A. Stevens, P.E.

Let A. Strue



PICTURE 1 – Overall Airside View



PICTURE 2 - Overall Side View



PICTURE 3 – View of Pit Level



PICTURE 4 – Pit View With Standing Water



PICTURE 5 - Power / Cable Vault



PICTURE 6 – Framing for Stair System



PICTURE 7 – CMU Infill at Door to Administration Areas



PICTURE 8 –Floor Deck Does Not Extend to Bearing Wall



PICTURE 9 - Floor Deck Parallel With Wall



PICTURE 10 – Control Tower Cab Support Framing



PICTURE 11 – Ductwork Through Walls



PICTURE 12 – Beam Framing and Anchorage Plates Along Wall



PICTURE 13 – Typical Support for Control Tower Roof/Glazing System



PICTURE 14 – Typical Bracing at Top of Control Tower Support



PICTURE 15 – Rusting at Main Level Railing of Control Tower



PICTURE 16 – Rusting at Main Level Railing and Support Angle of Control Tower



PICTURE 17 – Rusting at Base of Control Tower Window



PICTURE 18 – Rusted Railing at High Roof Over the Cab

APPRENDIX B

Mechanical, Electrical and Plumbing Findings

Eng Engineering

Building 82 Air Traffic Control Tower Findings.

By Edward J. Eng PE

October 29, 2012

I have visited the site and below are my mechanical, electrical, and plumbing findings:

General

The building has an emergency generator for use when JEA power is offline. The code allows the emergency generator powering life safety lights, devices, and control tower functions.

The findings are based on a site visit and photographs and not considered all encompassing of code findings.

A. Generator Room. (Converted to storage electrical room)

- 1. Vertical wire-ways do not have fire rated protection through rated floors. NEC 70, art 300
- 2. Working clearance for electrical equipment, i.e. disconnect, panels, telephone board, etc., requires minimum 3ft in front, 6 ft overhead clear of obstruction NEC 110.26
- 3. Cables with different voltages cannot be in same raceway. NEC 70, art 300
- 4. Cables must be identified. NEC 70, art 310
- 5. Network cables cannot be mixed with other cables requires separation. NEC 70, art 830
- 6. Wire splicing must be in enclosures rated for use. NEC 70 art 314
- 7. All network cables must be supported. NFPA 75
- 8. Unprotected cables are subject to physical damage. NEC 70, art 300
- 9. Improper bonding of conduits and raceways. NEC 70, art 250
- 10. Electrical equipment shall be installed in a neat workmanlike manner. NEC 70, art 110.12
- 11. Unused openings shall be closed to afford protection. NEC 70, art 110.12, 312
- 12. Missing covers of conduit body. NEC 70, art 314
- 13. Missing wire-way covers. Wire-ways must have manufacturer's name or trademark visible after installation. NEC 70, art 376
- 14. Abandoned cables must be removed unless in metal raceway. NEC 70 art 645, NFPA 75
- 15. Cables leaving IT room penetrating fire resistive boundary must be protected. NEC 70 art 645, NFPA 75
- 16. Cables for future use must be identified and in metal raceways. NEC 70 art 645, NFPA 75









B. Informational Technology Room (Former training room)

- 1. Cables leaving IT room penetrating fire resistive boundary must be protected. NEC 70 art 645, NFPA 75
- 2. Cables for future use must be identified and in metal raceways. NEC 70 art 645, NFPA 75
- 3. Training room converted to Information technology room and requires rated area. NFPA 75

- 4. Information technology equipment rooms and information technology equipment areas located in a non-sprinklered building shall be provided with an automatic sprinkler system or a gaseous clean agent extinguishing system or both. NFPA 75
- 5. All exposed non-current-carrying metal parts of an information technology system shall be grounded in accordance with NFPA 70, National Electrical Code®, Article 250 or shall be double insulated. NFPA 75
- 6. Missing grounding of enclosures. NEC 70, art 250





C. Main Building Electrical Room

- 17. Working clearance for electrical equipment, i.e. disconnect, panels, telephone board, etc., requires minimum 3ft in front, 6 ft overhead clear of obstruction NEC 110.26
- 18. Telephone board must have 3 ft clearance in front. NEC 70, art 110.26





2nd Floor

D. Mechanical Room

1. Missing wire-way covers. Wire-ways must have manufacturer's name or trademark visible after installation. NEC 70, art 376

- 2. Cables with different voltages cannot be in same raceway. NEC 70, art 300
- 3. Cables must be identified. NEC 70, art 310
- 4. Network cables cannot be mixed with other cables requires separation. NEC 70, art 830
- 5. Wire splicing must be in enclosures rated for use. NEC 70 art 314
- 6. All network cables must be supported. NFPA 75
- 7. Unprotected cables are subject to physical damage. NEC 70, art 300
- 8. Improper bonding of conduits and raceways. NEC 70, art 250
- 9. Electrical equipment shall be installed in a neat workmanlike manner. NEC 70, art 110.12
- 10. Cables leaving IT room penetrating fire resistive boundary must be protected. NEC 70 art 645, NFPA 75
- 11. Cables for future use must be identified and in metal raceways. NEC 70 art 645, NFPA 75
- 12. Water heater needs expansion relief. FPC Sect 504
- 13. Water heater requires auxiliary drain pan. FPC Sect 504







Third Floor

E. Instrument Room

- 1. Working clearance for electrical equipment, i.e. disconnect, panels, telephone board, etc., requires minimum 3ft in front, 6 ft overhead clear of obstruction NEC 110.26
- 2. Missing wire-way covers. Wire-ways must have manufacturer's name or trademark visible after installation. NEC 70, art 376
- 3. Missing audible and visible signaling NFPA 72
- 4. Fan coil unit below minimum ceiling height of 7 ft for storage room. FBC Sect 1208









Fourth Floor

F. Break Room

- 1. Cables must be identified. NEC 70, art 310
- 2. Working clearance for electrical equipment, i.e. disconnect, panel, telephone board, etc., requires minimum 3ft in front, 6 ft overhead clear of obstruction NEC 110.26
- 3. Electrical equipment shall be installed in a neat workmanlike manner. NEC 70, art 110.12
- 4. Network cables cannot be mixed with other cables requires separation. NEC 70, art 830
- 5. Unprotected cables are subject to physical damage. NEC 70, art 300
- 6. Wire splicing must be in enclosures rated for use. NEC 70 art 314
- 7. All network cables must be supported. NFPA 75
- 8. Improper bonding of conduits and raceways. NEC 70, art 250
- 9. Unused openings shall be closed to afford protection. NEC 70, art 110.12, 312
- 10. Missing covers of conduit body. NEC 70, art 314
- 11. Missing wire-way covers. Wire-ways must have manufacturer's name or trademark visible after installation. NEC 70, art 376
- 12. Abandoned cables must be removed unless in metal raceway. NEC 70 art 645, NFPA 75
- 13. Cables leaving IT room penetrating fire resistive boundary must be protected. NEC 70 art 645, NFPA 75
- 14. Cables for future use must be identified and in metal raceways. NEC 70 art 645, NFPA 75
- 15. Missing audible and visible signaling NFPA 72
- 16. Missing exit sign and tactical signage FBC Sect 1006.3









G. Roof

- 1. Cables must be identified. NEC 70, art 310
- 2. Working clearance for electrical equipment, i.e. disconnect, panel, telephone board etc., requires minimum 3ft in front, 6 ft overhead clear of obstruction NEC 110.26
- 3. Unprotected cables are subject to physical damage. NEC 70, art 300
- 4. Improper bonding of conduits and raceways. NEC 70, art 250
- 5. Electrical equipment shall be installed in a neat workmanlike manner. NEC 70, art 110.12
- 6. Missing covers of conduit body. NEC 70, art 314
- 7. Abandoned cables must be removed unless in metal raceway. NEC 70 art 645, NFPA 75
- 8. Cables for future use must be identified and in metal raceways. NEC 70 art 645, NFPA
- 9. Need convenience receptacle for roof maintenance NEC/NFPA 70 art 210
- 10. Antenna High mast missing guy wires to withstand code winds FBC sect 1620









H. Control Tower

- 1. Missing audible and visible signaling NFPA 72
- 2. Original plans call for an emergency ventilation system. The make-up air fan has been removed. Could not determine if exhaust fan is operational.

APPRENDIX C

Hazardous Materials - Visual Existing Conditions Survey

Aerostar SES, LLC



September 17, 2012

Larry Elkins, P.E.
Project Manager
The LPA Group Incorporated
A Unit of Michael Baker Corporation
Concourse III
5200 Belfort Road, Suite 110
Jacksonville, Florida 32256

RE: Visual Existing Conditions Survey
Limited Portions of Building 82 – Control Tower
Cecil Field
Jacksonville, Duval County, Florida

Dear Mr. Elkins:

Aerostar SES LLC (Aerostar) is pleased to provide the results of a visual existing conditions survey conducted at the referenced site. Aerostar is a Licensed Asbestos Consultant, recognized by the Department of Business and Professional Regulation (DBPR), Asbestos Licensing Unit, State of Florida, License Number ZA455. Aerostar is certified by the United States Environmental Protection Agency (EPA), Pesticides and Toxic Substances Branch, to conduct lead-based paint (LBP) activities in the State of Florida, Certification Number FL-1654-3. The survey was conducted by Mr. Arturo Confiado, an Asbestos Hazard Emergency Response Act (AHERA)-certified Asbestos Inspector, Certificate Number, and an EPA-certified LBP Risk Assessor, Certificate Number FL-R-11742-1. According to information provided, Aerostar understands that limited portions of Building 82 are to undergo renovations, which includes the Air Traffic Control Tower (ATCT), restrooms, and support areas (mechanical and electrical rooms). Office areas were not included in the visual survey. The scope of services includes identifying materials and components which may be hazardous and may require special handling, and preparing a report documenting the findings of the investigation.

FINDINGS

Asbestos

On September 6, 2012, Mr. Arturo Confiado performed a visual inspection of the referenced site for suspect asbestos-containing material (ACM). The visual inspection for suspect ACM consisted of the identification and classification of accessible suspect building materials as a homogeneous sampling area. The survey resulted in the identification of a total of 26 homogeneous areas. The 26 homogeneous areas identified and sampled as part of this survey included the following:

Old Generator Room (Exterior Mechanical Room)

• Thermal System Insulation (TSI)

Stairwell (All Floors)

- TSI (labeled ACM)
- HVAC Dampers on ceiling

2nd Floor – Mechanical Room

- Dampers
- Duct Mastic
- TSI (labeled ACM)

2^{nd} Floor - Roof

- Rolled Asphaltic Roof
- Black Mastic on flashing and roof penetrations
- Pitch Pockets at ladder and railing anchors

3rd Floor – Radio Room

- TSI
- Vinyl Sheet Floor (VSF)
- 12"x12" Acoustical Ceiling Tile (ACT)
- Duct Mastic

4th Floor – Break Room

- 9"x9" Vinyl Floor Tile
- HVAC Dampers

4th Floor – Bathroom

- Drywall
- Joint Compound
- 4" Black Cove Base
- 2'x2' ACT

Tower Cab

• 2'x2' ACT

The LPA Group Incorporated September 17, 2012 Page 3

STARS Room

- Plaster Ceiling
- 2'x4' ACT
- Drywall
- Joint Compound
- 4" Green Cove Base
- Carpet Mastic

LBP

On September 6, 2012, Mr. Arturo Confiado performed a visual inspection of the referenced site for suspect LBP. The visual inspection for LBP consisted of the identification of accessible surface coatings suspected of containing LBP. The coatings identified as part of this inspection included the following:

- Beige concrete interior walls and ceilings throughout the Stairwell, 2nd floor Mechanical Room, 3rd floor Radio Room, and 4th floor Break Room
- Beige metal ducts in the Stairwell, 2nd floor Mechanical Room, 3rd floor Radio Room, and 4th floor Break Room
- Beige TSI in Stairwell, 2nd floor Mechanical Room, and 3rd floor Radio Room
- Blue metal doors on the exterior
- Blue metal rails and ladders in the Stairwell and exterior
- Gray metal rails in the Stairwell
- White concrete walls on the exterior
- White drywall and concrete walls in the STARS Room
- White metal door casings on the exterior

Other Hazardous Components

On September 6, 2012, Aerostar performed a visual inspection of the referenced site to identify lighting ballasts and lamps that may contain polychlorinated biphenyls (PCB), as required by EPA regulation 40 CFR 761.45(g), and to identify possible mercury- or PCB-containing lighting and switches. The suspect components identified as part of this inspection included the following:

- Compact Fluorescent Lamps (CFLs) in Mechanical Room 2 (Exterior), Stairwell, 4th floor Bathroom, and Tower Cab
- Incandescent Lamps in the Old Generator Room, 2nd floor Mechanical Room, Tower Cab
- Light Fixtures with Fluorescent Lamps and Ballasts in Mechanical Room 2 (Exterior), 2nd floor Mechanical Room, 3rd floor Radio Room, 4th floor Break Room, STARS Room
- Exit sign in the Stairwell
- Avionic and radio equipment in the Tower Cab and 3rd floor Radio Room

The LPA Group Incorporated September 17, 2012 Page 4

LIMITATIONS

Aerostar has prepared this Visual Existing Conditions Survey Letter Report for The LPA Group Incorporated, a unit of Michael Baker Corporation, hereafter referred to as the Client. No sampling can eliminate all uncertainty. Professional judgment and interpretation are inherent in the process and uncertainty is inevitable. Even when sampling is executed with an appropriate site-specific standard of care, certain conditions present especially difficult detection problems. Such conditions may include, but are not limited to, physical limitations imposed by the location and accessibility of possible ACM, LBP, hazardous components, and the limitations of assessment technologies. Only areas directed by onsite personnel scheduled for renovations were sampled as part of this investigation. Aerostar is not responsible for possible ACM, LBP, or hazardous components that were inaccessible and/or not located, or any consequential damages.

Measurements and sampling data only represent the site conditions at the time of the data collection. Aerostar makes no legal representations whatsoever concerning any matter including, but not limited to, ownership of any property or the interpretation of any law. Aerostar further disclaims any obligations to update the report for events taking place after the time during which the assessment was conducted.

This report is not a comprehensive site characterization and should not be construed as such. The opinions presented in this report are based upon the findings derived from the samples collected.

The scope of work performed herein was limited to a visual inspection of accessible materials at the time of inspection. Aerostar has endeavored to meet what it believes is the applicable standard of care, and, in doing so, is obliged to advise the Client of the limitations. Aerostar believes that providing information about limitations is essential to help the Client identify and thereby manage risks. Through additional testing, these risks can be mitigated - but they cannot be eliminated. Aerostar will, upon request, advise the Client of the additional research opportunities available, their impact, and their cost.

As noted above, the survey conducted at the referenced site and this report was prepared for the use solely by the Client. This report shall not be relied upon by or transferred to any other party without the express written authorization of Aerostar.

CONCLUSIONS

Asbestos

The EPA defines an ACM as a material containing 1% or greater asbestos. A total of 26 homogeneous areas were identified. Bulk samples of these areas were not collected for laboratory analysis, and are assumed to contain asbestos until sampled.

The LPA Group Incorporated September 17, 2012 Page 5

Suspect components encountered during renovation/demolition activities that are not identified in this survey should be assumed to contain asbestos or be sampled by an AHERA-certified inspector and analyzed by an accredited laboratory.

LBP

Based on the Department of Housing and Urban Development (HUD) guidelines, LBP is defined as paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter (mg/cm²) or 0.5 percent by weight (% wt.). No paint chip or x-ray fluorescence device samples were collected for this survey, and surface coatings are assumed to contain LBP until sampled.

The beige paint on the metal ducts in the 2nd floor Mechanical Room, 3rd floor Radio Room, and 4th floor Break Room were peeling and considered to be in poor condition. The blue paint on the exterior metal rails, ladders, and doors was either chalking or peeling and considered to be in poor condition. All other coatings were intact and considered to be in good condition.

Other Hazardous Components

Aerostar visually identified several suspect hazardous components which include: CFLs, fluorescent lamps, lighting ballasts, exit signs and electronic equipment. Further inspection of these components will confirm these findings.

According to manufacturer material safety data sheets (MSDS), the fluorescent and compact fluorescent lamps, if broken, may result in some exposure to the phosphor powder dust and to a small amount of elemental mercury vapor. The fluorescent and compact fluorescent lamps should be disposed of in accordance to Standards for Universal Waste Management, 40 CFR Part 273.5. The EPA requires commercial entities to dispose of metal halide and other mercury-containing bulbs as hazardous waste.

Suspect mercury- and PCB-containing components encountered during renovation/demolition activities that are not identified in this survey should be assumed to contain hazardous material and disposed of in accordance to federal, state, and local regulations.

Aerostar appreciates the opportunity to provide this cost estimate to you. If you have any questions or require additional information, please feel free to contact the undersigned or Frank Redway at (904) 565-2820.

Sincerely,

Aerostar SES LLC

Senior Project Manager

Paul M. Fitch, PE, LAC

Senior Engineer

APPRENDIX D

Additional Condition Photos





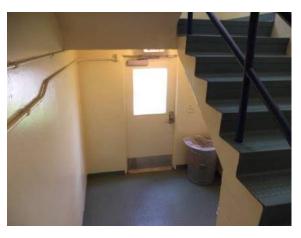
Exterior Tower



Vault with water intrusion



Stairwell door at 2nd level



Stairwell to exterior ground level





Basement level



Break room/mechanical room



ACM labels on pipe insulation in stairwell



Break room/mechanical room



Mechanical system



Typical electrical fixture

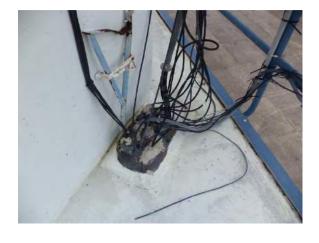


Structural deck at wall with water intrusion



Ships stair into cab





Conduit penetration



Cab glazing detail



Cab catwalk



Cab catwalk







Cab catwalk



Cab roof access



ACM label on pipe insulation in stairwell

Handrail in stairwell

<u>ATTACHMENT B</u>

EXCERPTS FROM THE ATCT SITING STUDY

CECIL AIRPORT

AIRPORT TRAFFIC

CONTROL TOWER

SITING STUDY



SAFETY RISK

MANAGEMENT

DOCUMENT



FEBRUARY 2015





TABLE 4-1 VQQ SITE COMPARISON CHART

Item Description	Site 1 (Preferred Site)	Site 2	Site 3
Preferred Site	Yes	No	No
Eye Level	107 ft AGL, 180 ft MSL	138 ft AGL, 197 ft MSL	135 ft AGL,195 ft MSL
Latitude / Longitude	30°-13'-16.72" N 81°-52'-51.86" W	30°-12'-45.08" N 81°-52'-15.61" W	30°-12'-47.97" N 81°-52'-52.41" W
ATCT Height (incl. antennas)	135.5 ft AGL, 208.5 ft MSL	163.5 ft AGL, 222.5 ft MSL	163.5 ft AGL, 223.5 ft MSL
Maximum Distance (to farthest point, Key Point, on all runways and taxiways)	7,978 ft (Future Taxiway E South)	8,456 ft (Taxiway A North)	8,314 ft (Future Taxiway E North)
Object Discrimination, Pass/Fail, Front View, Dodge Caravan (FAA ATCTVAT)	Pass Detection 99.3% Recognition 44.4%	Pass Detection 99.1% Recognition 37.9%	Pass Detection 99.2% Recognition 40.0%
Line of Sight Angle of Incidence	0.8°	0.8°	0.8°
ATCT Orientation Direction	SE	NW	NE
Access to ATCT Site	Yes	No	No
Environmental Issues	Not Significant	Not Significant	Not Significant
Potential Impacts to NAVAIDs	VQQ VOR	VQQ VOR 145' to AWOS	VQQ VOR
TERPS Impacts	Potential increase MDA RNAV-GPS RWY 27R (Future)	Potential increase MDA RNAV-GPS RWY 27L, RWY 27R and RWY 36L (Future)	Potential increase MDA RNAV-GPS RWY 27R and RWY 36L (Future)
Part 77 Impacts	None. Obstruction Light Required.	Transitional Surface RWY 9R-27L and RWY18L-36R Penetrated. Obstruction Light Required.	Transitional Surface RWY 9R-27L Penetrated. Obstruction Light Required.
Total Construction Cost Estimates (incl. ATC equipment)	\$5,205,513	\$8,167,034	\$8,778,147
Safety Assessment Initial Risk Ranking	H M L 0 0 0	H M L 0 0 0	H M L 0 0 0
Safety Assessment Predicted Residual Risk Ranking	H M L 0 0 0	H M L 0 0 0	H M L 0 0 0

<u>ATTACHMENT C</u>

PROTECTED SPECIES IN DUVAL COUNTY

As Section 7 of the Focused EA describes, there are federally and state protected species that have been documented in Duval County. For the purposes of this Focused EA, each protected species documented to occur in Duval County was categorized according to its likelihood of occurrence within the project study area. The likelihood of occurrence is separated into "observed", "high", "moderate", "low", or "none." The likelihood of occurrence for each species was determined though literature review, habitat requirements of species, and field reconnaissance in April 2015. None of the protected species have a moderate, high, or observed likelihood of occurrence. The following sections list the species with a low likelihood of occurrence within the project study area.

C.1 FEDERALLY PROTECTED SPECIES

The following federally protected species have a low likelihood of occurrence within the project study area:

- » Florida flatwoods salamander (Ambystoma cingulatum) Threatened
- » American alligator (Alligator mississippiensis) Threatened
- » Eastern indigo snake (*Drymarchon couperi*) Threatened
- » Gopher tortoise (Gopherus polyphemus) Candidate Species
- » Red-cockaded woodpecker (Picoides borealis) Endangered
- » Wood stork (Mycteria americana) Threatened
- » Piping plover (Charadrius melodus) Threatened

C.2 STATE PROTECTED SPECIES

The following state protected species have a low likelihood of occurrence within the project study area:

- » Florida flatwoods salamander (Ambystoma cinqulatum) Threatened
- Sopher Frog (Rana capito) Species of Special Concern
- » American alligator (Alligator mississippiensis) Threatened
- » Eastern indigo snake (Drymarchon couperi) Threatened
- Sopher tortoise (Gopherus polyphemus) Threatened
- » Florida pine snake (Pituophis melanoleucus mugitus) Species of Special Concern
- Tricolored heron (Egretta ticolor) Species of Special Concern
- » Snowy egret (Egretta thula) Species of Special Concern
- » Little blue heron (Egretta caerulea) Species of Special Concern
- White ibis (Eudocimus albus) Species of Special Concern
- » Red-cockaded woodpecker (Picoides borealis) Endangered
- » Limpkin (Aramus guarauna) Species of Special Concern
- » Florida Burrowing Owl (Athene cunicularia floridana) Species of Special Concern
- Wood stork (Mycteria americana) Threatened
- » American oyster catcher (Haematopus palliatus) Species of Special Concern
- » Florida sandhill crane (Grus canadensis pratensis) Threatened

- » Least tern (Sterna antillarium) Threatened
- » Piping plover (Charadrius melodus) Threatened
- » Black Skimmer (Rynchops niger) Species of Special Concern
- » Brown Pelican (Pelecanus occidentalis) Species of Special Concern
- Southeastern American kestrel (Falco sparverius paulus) Threatened
- Worthington's Marsh Wren (Cistothorus palustris griseus) Species of Special Concern
- » Sherman's fox squirrel (Sciurus niger shermani) Species of Special Concern

C.3 OTHER PROTECTED SPECIES

The following five species protected under the Migratory Bird Treaty Act (MBTA) were observed within the project study area during field reconnaissance in April 2015:

- » Northern mockingbird (Mimus polyglottos)
- » Loggerhead shrike (Lanius ludovicianus)
- Common grackle (Quiscalus quiscula)
- » Boat-tailed grackle (Quiscalus major)
- » Eurasian collared-dove (Streptopelia decaocto)

SECTION 106 CONSULTATION & HISTORIC ARCHITECTURAL RESOURCE ASSESSMENT

ATTACHMENT D

SECTION 106 CONSULTATION & HISTORIC ARCHITECURAL RESOURCE ASSESSMENT



RICK SCOTT
Governor

KEN DETZNER
Secretary of State

David Alberts RS&H 10748 Deerwood Park Boulevard S Jacksonville, Florida 32256 April 27, 2015

RE: DHR Project File No.: 2015-1413, Received by DHR: March 26, 2015 Project: Proposed Replacement Air Traffic Control Tower at Cecil Airport

Dear Mr. Alberts:

This office reviewed the referenced project for possible effects on historic properties listed, or eligible for listing, on the *National Register of Historic Places*. The review was conducted in accordance with Section 106 of the *National Historic Preservation Act of 1966*, as amended, and its implementing regulations in 36 CFR Part 800: Protection of Historic Properties.

Based on the information provided, it is the opinion of this office that the proposed undertaking with have no effect on the historic (1954) Air Traffic Control Tower; as it does not appear to be eligible for listing on the *National Register of Historic Places*. However, this office does request that the historic Air Traffic Control Tower is documented prior to the proposed undertaking. Documentation should include a completed Florida Master Site File Historic Structure Form, current archival quality photographs (digital is acceptable if it meets our requirements) and a location map. A copy of the structure form and digital photograph requirements can be downloaded at http://dos.myflorida.com/historical/preservation/master-site-file/documents-forms/

Furthermore, it is the opinion of this office that the proposed undertaking is not likely to have an effect on unrecorded historic properties, provided that the agency includes the following plan in the case of fortuitous finds or unexpected discoveries during ground disturbing activities within the project area. This permit, if issued, should include the following special conditions regarding activities on the property:

- If prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with Native American, early European, or American settlement are encountered at any time within the project site area, the permitted project shall cease all activities involving subsurface disturbance in the immediate vicinity of the discovery. The applicant shall contact this office and project activities shall not resume without verbal and/or written authorization.
- In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, *Florida Statutes*.

If you have any questions, please contact Christopher Hunt, RPA, Historic Sites Specialist, by email at *Christopher.Hunt@dos.myflorida.com*, or by telephone at 850.245.6333 or 800.847.7278.

Sincerely

Robert F. Bendus, Director

Division of Historical Resources & State Historic Preservation Officer





rsandh.com



March 23, 2015

Mr. Robert F. Bendus
Department of State
Historical Resources Division
R.A. Gray Building
500 South Bronough Street, Room 418
Tallahassee, Florida

RE: Cecil Airport

Proposed Replacement Air Traffic Control Tower

Duval County, Florida

National Historic Preservation Act, Section 106 Coordination

Dear Mr. Bendus,

The Jacksonville Airport Authority (JAA) is preparing an Environmental Assessment (EA) for approval by the FAA to construct a replacement Air Traffic Control Tower (ATCT) at Cecil Airport. The FAA, as the sponsoring federal agency, is required to ensure that the Proposed Action meets the requirements of the National Environmental Policy Act (NEPA), including Section 106 of the *National Historic Preservation Act* (NHPA).

<u>Project Location</u>: The airport location and project location are shown in Figure 1. Cecil Airport is located in the southwest portion of Duval County, Florida and is owned and operated by the JAA. The project site is located within Section 23, Township 3S and Range 24E. Figure 1 and Figure 2 depicting the project location, project site, and existing environment within the location of the Proposed Action are enclosed.

<u>Proposed Action</u>: In accordance with NEPA and FAA Orders 1050.1E, *Policies and Procedures for Considering Environmental Impacts* and 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions of Airport Actions*, the EA will analyze the potential environmental effects of the Proposed Action. As shown in Figure 2, JAA has requested FAA's unconditional approval of the changes to the airport layout plan depicting the Proposed Action which would entail the following interrelated project components:

- Construction of a replacement ATCT that will include a control cab on top of a function shaft. The
 replacement ATCT will have a base of approximately 26 feet squared and would be approximately 135
 feet high (above ground level);
- Construction of a sidewalk to the proposed replacement ATCT; and
- Extension of the existing security fence to include the proposed replacement ATCT.

<u>Historic Property (architectural, archaeological and cultural)</u>: According to the National Register of Historic Places (NRHP), several historic properties listed on the NRHP are located in Duval County. The closest NRHP-listed or eligible resource is the William Clarke Estate, located approximately 10 miles southeast of the



Proposed Action.¹ In addition, according to the Florida Master Site File, the Westberry Griffs Homestead is eligible for the NRHP and is located seven miles southwest of the Proposed Action.² Due to the distance of the Proposed Action from these historic resources, implementation of the Proposed Action would not directly or indirectly affect historic property.

According to the Florida Master Site File, a cultural resource field survey was conducted for the Cecil Airport property (Survey Number 6184). The 1998 *Final Environmental Impact Statement, Disposal and Reuse of Naval Air Station Cecil Field*, Jacksonville, Florida reported that there no known archaeological sites at the Airport.³ This includes the location of the Proposed Action. As shown in Figure 2, a majority of the project area has been cleared and disturbed by previous activities and is presently mowed and maintained by JAA.

Therefore, the Proposed Action is not anticipated to result in significant direct or indirect impacts to historic property.

Section 106 Coordination: On behalf of the FAA, this Section 106 coordination packet is sent to you to:

- advise your agency of the preparation of the EA;
- request any relevant information that your agency may have regarding the project site or environs;
- 3. solicit comments regarding potential environmental, social, and economic issues for consideration during the preparation of the EA.

We recognize the volume of consultation letters processed by your agency and as always appreciate your expeditious review and response. You may provide your response to the above address or via e-mail, david.alberts@rsandh.com.

If you have questions or need additional information, please contact me at the above e-mail address or by phone at (904) 256-2469 or Ms. Virginia Lane, FAA Environmental Protection Specialist at virginia.lane@faa.gov or (407) 812-6331 x129.

Sincerely,

David Alberts Project Manager

Enclosures

cc (w/o encl): Ms. Virginia Lane, FAA Orlando ADO

¹ National Register of Historic Places, http://www.nps.gov/nr/research/data_downloads.htm, Spatial GIS, accessed February 2, 2015.

² Florida Geographic Data Library (FGDL), University of Florida's GeoPlan Center, http://www.fgdl.org/metadataexplorer/explorer.jsp, October 2014, accessed February 2, 2014.

³ U.S. Department of the Navy, Final Environmental Impact Statement, Disposal and Reuse of Naval Air Station Cecil Field, Jacksonville, Florida. October 1998.

March 23, 2015

NAME TRIBE ADDRESS ADDRESS

RE: Cecil Airport
Proposed Replacement Air Traffic Control Tower
Duval County, Florida

National Historic Preservation Act, Section 106 Coordination

Dear [NAME],

The Jacksonville Airport Authority (JAA) is preparing an Environmental Assessment (EA) for approval by the FAA to construct a replacement Air Traffic Control Tower (ATCT) at Cecil Airport. The FAA, as the sponsoring federal agency, is required to ensure that the Proposed Action meets the requirements of the National Environmental Policy Act (NEPA), including Section 106 of the *National Historic Preservation Act* (NHPA).

<u>Project Location</u>: The airport location and project location are shown in Figure 1. Cecil Airport is located in the southwest portion of Duval County, Florida and is owned and operated by the JAA. The project site is located within Section 23, Township 3S and Range 24E. Figure 1 and Figure 2 depicting the project location, project site, and existing environment within the location of the Proposed Action are enclosed.

<u>Proposed Action</u>: In accordance with NEPA and FAA Orders 1050.1E, <u>Policies and Procedures for Considering Environmental Impacts</u> and 5050.4B, <u>National Environmental Policy Act (NEPA)</u> <u>Implementing Instructions of Airport Actions</u>, the EA will analyze the potential environmental effects of the Proposed Action. As shown in Figure 2, JAA has requested FAA's unconditional approval of the changes to the airport layout plan depicting the Proposed Action which would entail the following interrelated project components:

- Construction of a replacement ATCT that will include a control cab on top of a function shaft. The replacement ATCT will have a base of approximately 26 feet squared and would be approximately 135 feet high (above ground level);
- Construction of a sidewalk to the proposed replacement ATCT; and
- Extension of the existing security fence to include the proposed replacement ATCT.

<u>Historic Property (architectural, archaeological and cultural)</u>: According to the National Register of Historic Places (NRHP), several historic properties listed on the NRHP are located in Duval County.

The closest NRHP-listed or eligible resource is the William Clarke Estate, located approximately 10 miles southeast of the Proposed Action. In addition, according to the Florida Master Site File, the Westberry Griffs Homestead is eligible for the NRHP and is located seven miles southwest of the Proposed Action. Due to the distance of the Proposed Action from these historic resources, implementation of the Proposed Action would not directly or indirectly affect historic property.

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Therefore, the Proposed Action is not anticipated to result in significant direct or indirect impacts to historic property.

<u>Section 106 Coordination</u>: We are sending you this Section 106 Coordination packet to:

- 1. advise your agency of the preparation of the EA;
- 2. request any relevant information that your agency may have regarding the project site or environs; and
- 3. solicit comments regarding potential environmental, social, and economic issues for consideration during the preparation of the EA.

We recognize the volume of consultation letters processed by your agency and as always appreciate your expeditious review and response. You may provide your response to the above address or via e-mail, virginia.lane@faa.gov.

If you have questions or need additional information, please contact me at the above e-mail address or by phone at (407) 812-6331 x129.

Sincerely,

Virginia Lane Environmental Protection Specialist

Enclosures

cc (w/o encl): Mr. David Alberts, RS&H, Inc.

National Register of Historic Places, http://www.nps.gov/nr/research/data_downloads.htm, Spatial GIS, accessed February 2, 2015.

² Florida Geographic Data Library (FGDL), University of Florida's GeoPlan Center, http://www.fgdl.org/metadataexplorer/explorer.jsp, October 2014, accessed February 2, 2014.

³ U.S. Department of the Navy, Final Environmental Impact Statement, Disposal and Reuse of Naval Air Station Cecil Field, Jacksonville, Florida. October 1998.



36R

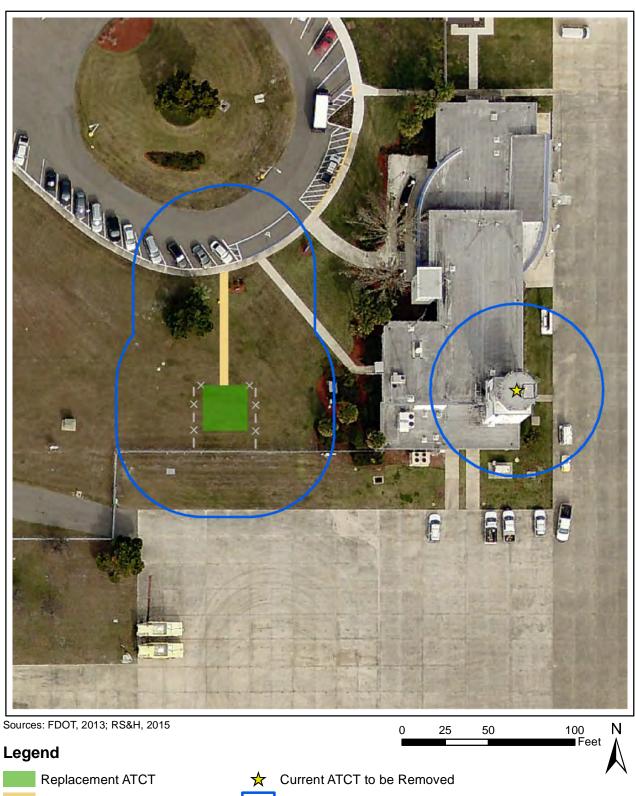
Sources: FDOT, 2013; Esri, 2015; RS&H, 2015

0 1,000 2,000 4,000 Feet

Legend

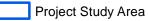
- Current ATCT Location
- Replacement ATCT Location
- Cecil Airport





Sidewalk to Replacement ATCT

 $\times - \times$ Security Fence Extension





Section 106 Coordination Mailing List Cecil Airport Environmental Assessment for Replacement ATCT

FL SHPO

Mr. Robert F. Bendus
Department of State
Historical Resources Division
R.A. Gray Building
500 South Bronough Street, Room 418
Tallahassee, Florida

Miccosukee Tribe of Indians of Florida

Mr. Colley Billie Chairman Miccosukee Tribe of Indians of Florida Tamiami Station P.O. Box 440021 Miami, FL 33144

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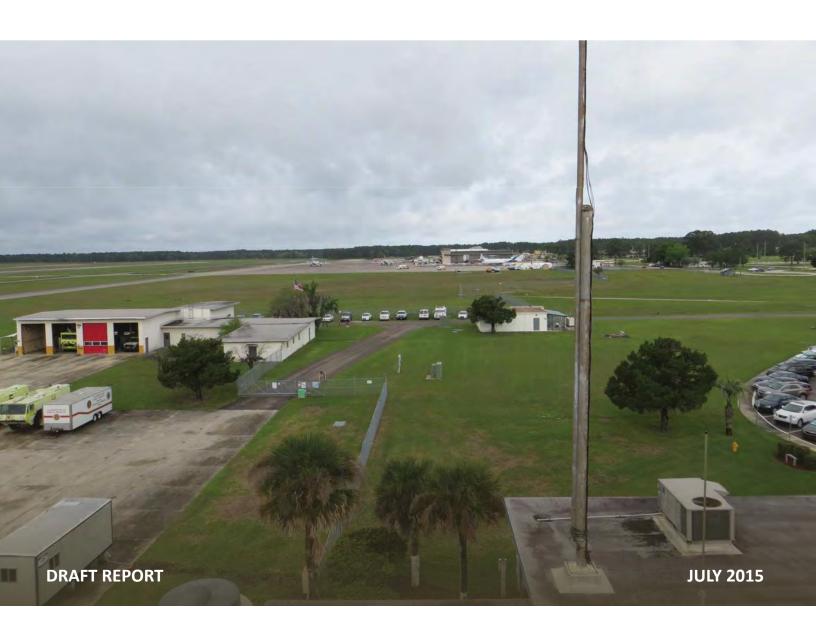
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TECHNICAL MEMORANDUM: HISTORIC ARCHITECTURAL RESOURCE ASSESSMENT OF THE CECIL AIRPORT, AIRPORT TRAFFIC CONTROL TOWER, DUVAL COUNTY, FLORIDA





TECHNICAL MEMORANDUM:

HISTORIC ARCHITECTURAL RESOURCE ASSESSMENT OF THE CECIL AIRPORT, AIRPORT TRAFFIC CONTROL TOWER, DUVAL COUNTY, FLORIDA

CONSULTANT: SEARCH

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PRINCIPAL INVESTIGATOR: Benjamin A. Roberts, MHP

ARCHITECTURAL HISTORIAN: Drew Cothran, MHP CLIENT: David Alberts, RS&H

 DATE:
 July 2015

 RS&H PROJECT #:
 201-2275-035

 SEARCH PROJECT #:
 3373-15035P

This technical memorandum details the results of a Historic Architectural Resource Assessment (HARA) of the Cecil Airport, Airport Traffic Control Tower (ATCT) in Duval County, Florida. The Jacksonville Aviation Authority (JAA) proposes to construct a replacement ATCT at Cecil Airport as a replacement to the existing Control Tower (Building No. 82). The JAA considers the existing tower to be technologically obsolete and does not meet local building codes. The existing tower does not accommodate air traffic controllers' line-of-sight views of proposed airfield expansions, and therefore is not suitable for future operations.

The purpose of the HARA was to locate, identify, and evaluate historic structures or potential districts within the project's Area of Potential Effect (APE) and to assess their potential for listing in the National Register of Historic Places (NRHP). All work was performed in accordance with the Florida Division of Historical Resources' (FDHR) recommendations for such projects as stipulated in the FDHR's *Cultural Resource Management Standards & Operations Manual, Module Three: Guidelines for Use by Historic Preservation Professionals.* The SEARCH Principal Investigator and architectural historian for this project meet the Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation* (48 FR 44716-42). This study also complies with Public Law 113-287 (Title 54 U.S.C.), which incorporates the provisions of the National Historic Preservation Act (NHPA) of 1966, as amended, and the Archeological and Historic Preservation Act of 1979, as amended. The study also complies with the regulations for implementing NHPA Section 106 found in 36 CFR Part 800 (*Protection of Historic Properties*).

The proposed replacement ATCT, located approximately 140 feet west of the existing ATCT, would be a visual flight rules (VFR) ATCT and would operate as part of the Federal Aviation Administration's (FAA's) Contract Tower Program. The proposed replacement ATCT would have a control cab on top of a function shaft and would initially accommodate two Airport Traffic Control Specialist (ATCS) positions, with space for up to two more positions. The Proposed Action includes the:

- construction of a replacement ATCT;
- construction of a sidewalk from the existing parking lot to the proposed replacement ATCT; and
- extension of the existing security fence to include the proposed replacement ATCT.

The APE for this assessment consists of the existing footprint of the Cecil Airport ATCT, the construction limits of the proposed replacement ATCT, and a 100 meter (328 foot) buffer surrounding each (Figure 1).

CECIL AIRPORT HISTORY

The Navy established Cecil Field in 1941. First as a Naval Auxiliary Air Station and then a full Naval Air Station, the installation served the Navy through the World War II, Korean War, and the Vietnam War eras. Training activities at the 20,000-plus acre installation continued through the 1970s, 1980s, and 1990s. As a result of Base Closure and Realignment Commission (BRAC) determinations, the installation officially closed in September, 1999 and transferred to the Jacksonville Aviation Authority.

In 1940 and 1941, the Navy searched for locations for auxiliary fields for NAS Jacksonville, which was quickly becoming a bastion of Naval Air training in northeast Florida. Military surveyors reviewed the 2,666-acre site of the future Cecil Field in Duval County, about twenty miles west of NAS Jacksonville. The site consisted of farm land, forest, and swamp. In February 1941, the Navy approved the site as Auxiliary Field No. 8 and began the acquisition of the property (Coletta and Bauer 1985).

The initial purpose of Cecil Field was to serve as an auxiliary field for NAS Jacksonville for primary, intermediate, and advanced training. Beginning in July, 1941, Lieutenant Commander J.B. Dunn (US Navy) oversaw construction work on the field. The facilities were to include barracks for 600 men, two hangars, a storehouse, a gasoline storage yard, and two 5,000-foot runways as well as various administration and maintenance buildings. On December 18 1941, Commander T.O. Southworth commissioned the field 'Cecil Field' in honor of Henry Barton Cecil Commander (US Navy) who was killed in a 1933 dirigible crash (Bureau of Yards and Docks 1947; Coletta and Bauer 1985).

Following the attack on Pearl Harbor on December 7, 1941, Cecil Field became incredibly busy. Cadets from NAS Jacksonville trained in fighting, bombing, and gunnery. As the war progressed, the eight week ground school trained 400 students at a time and the one week gunnery school trained 350 at a time. Also, naval officers trained cadets in combat radar techniques in a variety of aircraft including the SNB *Navigator*, the FM-1 and FM-2 *Wildcats*, and the SB2C *Helldivers*. In March 1943, the Navy transferred fighter training from Cecil Field to NAS Green Cove Springs; however, Cecil Airport lost no significance in the Navy's training program and became the Navy's main dive-bombing training center and principal location for

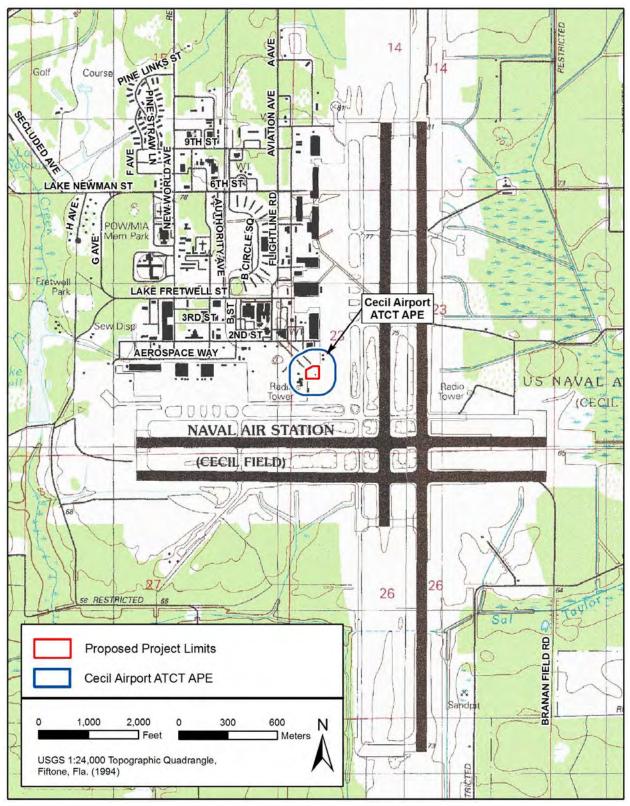


Figure 1. Cecil Airport with the Cecil Airport ATCT APE shown in blue.

war-at-sea preparations. The station was commissioned Naval Air Auxiliary Station (NAAS) Cecil Field in early 1943 (Coletta and Bauer 1985).

The first personnel of the Women Accepted for Volunteer Emergency Service (WAVES) arrived at Cecil Field in January 1944 to fill secretarial and clerical positions, and possibly other positions including mechanical, photography, and intelligence work. The addition of the WAVES to Cecil Field brought the overall personnel level of the Station to more than 1,300 people (Coletta and Bauer 1985). At the height of the war, the original 600-man barracks had expanded to accommodate 3,200 men (Bureau of Yards and Docks 1947).

After World War II, NAAS Cecil Field went through a period of uncertainty. At the end of the war, there was some operational training in November 1945, but activity at the Field dwindled in the following year as aircraft were sent elsewhere, the WAVES were released, and schools were phased out. In April 1946, a Naval Air Reserve Training Unit was organized at the Station. Captain Frederick W. Priestman commanded the unit which had 12 officers, 50 men, and six aircraft (Coletta and Bauer 1985).

In the late 1940s, activity at Cecil Field gradually increased. The Bureau of Personnel permitted 800 men to be stationed at the field. Advanced fighter pilot training commenced again in 1947. Through this program Naval and Marine officers trained under twenty-nine instructors. They trained in Link trainers and F4-U Corsairs at the Station before graduation and transfer to NAS Jacksonville. Fleet aircraft units returned to the Station for training in 1949. Despite this development, the Station nevertheless was in a status of maintenance and lacked the necessary personnel and equipment resources to perform at capacity. In June 1950, the Navy reduced the personnel complement of the Station to 89 (Coletta and Bauer 1985).

The Korean War revived Cecil Field. The Navy designated the Station to be one of four Master Jet Bases that could support naval seaports and handle, if necessary, physical expansion. The other three were NAS Oceana, NAS Moffett, and NAS Miramar. When Cecil Field was reactivated in August 1950, Naval Station Mayport served as the Station's logistics center. Between 1950 and 1951, eight naval aviation squadrons reported aboard Cecil Field (Coletta and Bauer 1985). On 30 June 1952, NAAS Cecil Field was designated a full Naval Air Station (*Jax Air News* 1974).

Due to the increased significance of the Station in the context of the Korean War period, the Navy approved a seven million dollar expansion project at Cecil Field. The expansions included nearly two thousand acres of additional land, two new runways to accommodate modern jets, a jet fuel pipeline from NAS Jacksonville, and a new hangar. After the Korean War in the 1952-1964 period, the Station again was expanded (**Figure 2**). The acreage increased dramatically to 16,000 acres, in order to accommodate jet aircraft. The main runway was lengthened from 3,000 feet to 8,000 feet in 1955 and, later, all runways reached 12,500 feet. A large engine repair shop was completed (Coletta and Bauer 1985; *Naval Aviation News* 1955).



Figure 2. Fighter Squadron pilots at Naval Air Station Cecil Field, Florida, circa 1954.

Source: Emil Buehler Library.

Cecil Field played an important role in the aerial intelligence operations over Cuba during the Cuban Missile Crisis of the early 1960s. Light Photographic Squadron 62, which was based at Cecil Field, monitored the buildup of missiles on the Caribbean island. The Chance Vought RF-8A *Crusaders* of the squadron took surveillance on the island. More than twenty jet squadrons and air groups called Cecil Field home by the mid-1960s as American participation in the Vietnam War increased (Coletta and Bauer 1985).

By the 1970s, Cecil Field was an important segment of the area economy and resembled a small city. The nearly 20,000 acre installation had its own outlying field, Whitehouse Field. The annual payroll was about \$22 million. There were 6,000 military and civilian personnel. One of the notable facilities at the installation was an 8,000-plus acre ammunition depot that was responsible for procurement, storage, maintenance, and issuance of naval attack carrier weapons. The ammunition area included a guided missile unit. Overall, the Station in the 1970s and 1980s continued to have a broad arrangement of Naval units (*Jax Air News* 1974).

The Base Realignment and Closure Commission (BRAC) determined in the 1990s that Cecil Field should be closed. The base officially closed in September 1999. Of the more than 20,000 acres of the Station, over 17,000 were transferred to the City of Jacksonville. The remainder was transferred to NAS Jacksonville. In the present, the site is a joint civil-military airport and spaceport managed by the Jacksonville Aviation Authority (JAA). The Florida Army National Guard has an Army Aviation Support Facility at the site and the US Coast Guard has a Helicopter Interdiction Tactical Squadron ("Naval Air Station Cecil Field" 2015).

A review of historic maps and aerial imagery revealed that many of the buildings constructed during the Cold War era periods of significance for Cecil Airport have been demolished. Several of the buildings at Cecil Airport constructed and associated with the Korean War and Cuban Missile Crisis periods of the Cold War were demolished sometime after the base was transferred to the City of Jacksonville in the early 2000s. Aerial photographs from 1999 and 2013 show numerous buildings from that era are no longer extant by 2013, and other buildings have been constructed or substantially altered at the Airport (**Figure 3**). The demolition/alteration of 1950s and 1960s era buildings along with the construction of several non-historic infill buildings interrupts the setting, rhythm, and feeling associated with the Cold War periods of significance at Cecil Airport.

PREVIOUS CULTURAL RESOURCE SURVEYS

Florida Master Site File (FMSF) data from January 2015 were reviewed to identify any previously recorded cultural resources within one mile of the Cecil Airport ATCT APE. The FMSF review indicates that three previous cultural resource surveys have been conducted within one mile of the current project area (**Table 1**).

Table 1. Previous Cultural Resources Assessment Surveys of the Cecil Airport.

FMSF No.	Title	Year	Reference
6552	Cultural Resource Assessment for Base Realignment and Closure, Naval Air Station Cecil Field	1995	E&E, Inc.
8537	Phase I Survey of Six Florida Army National Guard (FLARNG) Facilities in Florida	2002	SEARCH
13709	Phase I Archeological Survey of Cecil Field Airport Apron, Duval County, Florida	2006	Brockington and Associates, Inc.

In 1995, Ecology and Environment, Inc. (E&E, Inc.) conducted a Cultural Resource Assessment for Base Realignment and Closure (BRAC) actions at the Naval Air Station Cecil Field, which included the current project limits. The goal of the study was to facilitate the Navy's compliance with the NHPA of 1966 in transferring the airfield over to civilian use, and to evaluate any historically significant architecture and the archeological potential of the facility (E&E, Inc. 1995). In total, E&E surveyed 533 structures and concluded that none were found to be of historic significance individually. Additionally, E&E indicated the base as a whole could be considered a significant historic resource for its association with periods of US military history including the cold war era, although E&E did not define the boundaries or evaluate any potential historic district(s) due to the relative age of the resources associated with this period of significance (not having reached the 50 year threshold) at the time of their study. The study found no areas of archeological or architectural significance within the APE of the current project. In a letter dated August 15, 1995 the State Historic Preservation Officer (SHPO) concurred with E&E's findings.

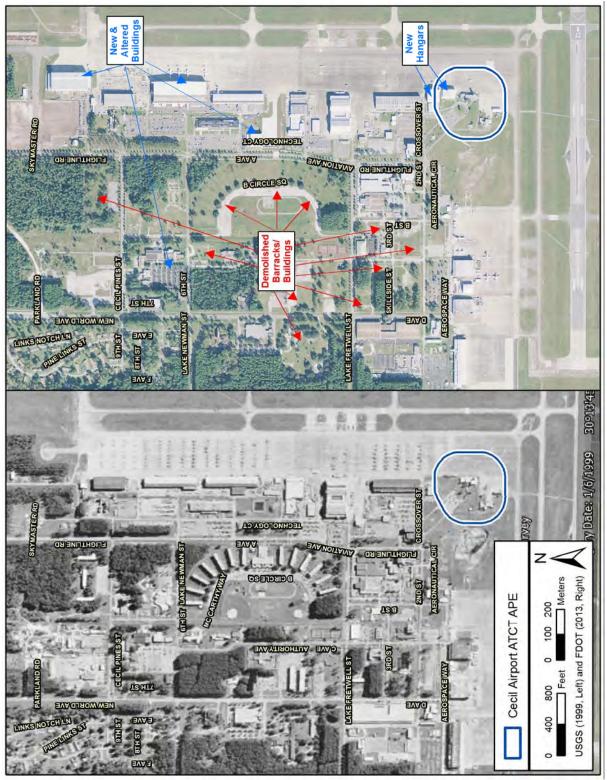


Figure 3. Cecil Airport in 1999 (left) and 2013 (right) with demolished buildings labeled in red and new/altered buildings labeled in blue.

In 2002, Southeastern Archeological Research, Inc. (SEARCH) conducted a Phase I Archeological Survey of Six Army Reserve Sites, one of which was Cecil Airport. The purpose of the survey was to identify archeological sites or historic properties located within the project parcels and evaluate them for eligibility for listing in the NRHP (SEARCH 2002). Three resources older than 50 years at the time of the survey were recorded at Cecil Airport (8DU14653, 8DU14678, and 8DU14679). The buildings were of common types and were recommended not eligible for inclusion in the NRHP. None of the recorded structures are within the current Cecil Airport ATCT APE. The 2002 SEARCH study concluded that it was unlikely that any intact subsurface archaeological sites remain at Cecil Airport due to extensive reworking of the soil to build the complex.

In 2006, Brockington and Associates, Inc. conducted a Phase I Archeological Survey of Cecil Airport for alterations to the Army Aviation Support Facility Hangar #1. The survey included a 1.35 acre tract around the hangar (Brockington and Associates 2006). The goal of the study was to facilitate the airfield staff's compliance with the NHPA. Brockington found 20 previously recorded historic sites associated with NAS Cecil Airport within one kilometer of their study, but found no significant archeological sites within the APE of the 2006 project, due to extensive earth-moving and alterations. In a letter dated January 17, 2007, the Florida State Historic Preservation Officer (SHPO) concurred with Brockington and Associates' findings.

RESEARCH DESIGN

Project Goals

The goal of this historic architectural resource assessment survey was to identify and document historic resources and structures located within the Cecil Airport ATCT APE and to evaluate them for their potential eligibility for listing in the NRHP. The research strategy was composed of a background investigation, a historical document and map search, and a field survey. The background investigation involved a review of available literature, including previous cultural resources survey work undertaken within one mile of the proposed project limits. The FMSF was checked for previously recorded historic resources within the APE.

The historical document search involved a review of primary and secondary historic sources as well as a review of the FMSF for any previously recorded historic structures. The original township plat maps, early aerial photographs, and other relevant sources were checked for information pertaining to the existence of historic structures, sites of historic events, and historically occupied or noted settlements within the proposed APE.

NRHP Criteria

Cultural resources identified within the APE were evaluated according to the criteria for listing in the NRHP. As defined by the National Park Service (NPS), the quality of significance in

American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. that are associated with events or activities that have made a significant contribution to the broad patterns of our history; or
- B. that are associated with the lives of persons significant in our past; or
- C. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. that have yielded, or may be likely to yield, information important in prehistory or history.

NRHP-eligible districts must possess a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. NRHP-eligible districts and buildings must also possess historic significance, historic integrity, and historical context.

Field Methods

The architectural survey for the project utilized standard procedures for the location, investigation, and recording of historic properties. In addition to a search of the FMSF for previously recorded historic properties within the APE, US Geological Survey (USGS) quadrangle maps were reviewed for structures that were constructed prior to 1966. The field survey inventoried existing buildings, structures, and other aspects of the built environment within the APE. The location of each historic resource identified within the APE was plotted on USGS quadrangle maps and on project aerials. All identified historic resources were photographed with a digital camera, and all pertinent information regarding architectural style, distinguishing characteristics, building materials and present conditions was recorded on FMSF structure forms. Upon completion of fieldwork, forms, and photographs were returned to the SEARCH offices for analysis. Date of construction, design, architectural features, condition, and integrity of the resource, as well as how the resources relate to the surrounding landscape, were carefully considered.

Procedures to Deal with Unexpected Discoveries

Every reasonable effort has been made during this investigation to identify and evaluate possible locations of prehistoric and historic archaeological sites; however, the possibility exists that evidence of cultural resources may yet be encountered within the project limits. Should evidence of unrecorded cultural resources be discovered during construction activities, all work in that portion of the project area must stop. Evidence of cultural resources includes aboriginal or historic pottery, prehistoric stone tools, bone or shell tools, historic trash pits, and historic

building foundations. Should questionable materials be uncovered during the excavation of the project area, SEARCH will assist in the identification and preliminary assessment of the materials and the FDHR will be notified.

HISTORIC ARCHITECTURAL RESOURCE ASSESSMENT RESULTS

In March 2015, SEARCH architectural historians conducted fieldwork to identify previously recorded or unrecorded historic resources located within the Cecil Airport ATCT APE. During the background research and fieldwork, SEARCH staff focused on identifying the following types of resources within the APE:

- Recorded Historic Resources
- Unrecorded Historic Resources (based on Property Appraiser data and map reconnaissance)
- Recorded Resource Group/District
- Unrecorded Resource Group/District
- Recorded NRHP-eligible or listed resources
- Unrecorded NRHP-eligible or listed resources

This information is summarized below in **Table 2 and Figures 4 and 5**.

Table 2. Historic Resources within the Cecil Airport ATCT APE.

Recorded	Unrecorded	Recorded	Unrecorded	Recorded NRHP-	Unrecorded NRHP-
Historic	Historic	Resource	Resource	Eligible or Listed	Eligible or Listed
Resources	Resources	Group	Group	Resources	Resources
No	Yes	No	No	No	No

The architectural survey resulted in the identification and evaluation of three newly recorded historic resources within the Cecil Airport ATCT APE (8DU21750, 8DU21751, and 8DU21752) (Figures 4 and 5). The identified historic resources were evaluated to determine their significance and potential for listing in the NRHP. All resources within the Cecil Airport ATCT APE lack the architectural distinction and significant historical associations necessary to be considered for listing in the NRHP and are recommended ineligible. Although the previous E&E study discussed considering the base as a whole for its association with multiple periods of US military history, specifically periods of the cold war era related to the Korean War and the Cuban Missile Crisis from 1952 to 1963, a significant number of the historic structures previously identified in 1995 have since been demolished. Therefore, this assessment did not identify any existing or potential NRHP districts within, or intersecting, the APE. FMSF forms were completed for the three newly recorded historic resources and are provided in Appendix A. A survey log sheet is provided in Appendix B.

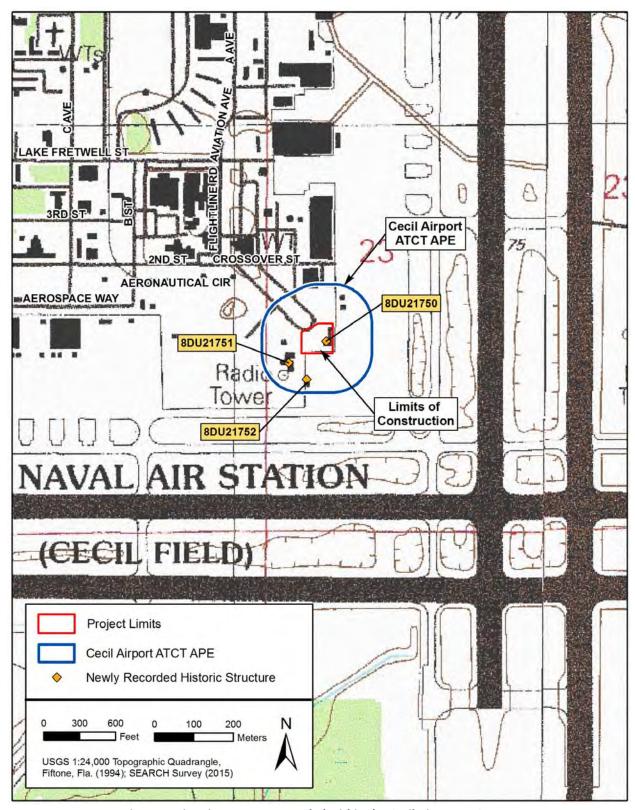


Figure 4. Historic resources recorded within the Cecil Airport ATCT APE.



Figure 5. Previously Unrecorded Historic Resources (8DU21750, 8DU21751, and 8DU21752) within the Cecil Airport ATCT APE.

NRHP EVALUATIONS

8DU21750, Cecil Airport Traffic Control Tower (Building 82)

Resource 8DU21750 is a newly recorded building located at Cecil Airport in section 23 of Township 3 South, Range 24 East, as shown on the 1994 Fiftone, Fla USGS quadrangle map (see Figures 4 and 5). It was constructed in 1954 as an addition to the airfield and is situated in the southeastern portion of the field. The building is a 5-story Industrial Vernacular building with an irregular plan situated on a concrete slab on-grade foundation. The exterior of the tower is poured concrete with metal railings and ladders affixed to the sides. The tower has three single-pane fixed windows along the east façade. There are also a variety of air-conditioning unit vents and fixtures irregularly positioned along each of elevations of the tower (Figure 6).

The tower has two entry ways, a single windowed metal door under a flat awning that leads directly to the tower stairs and a set of metal and glass doors that lead into the basement of the structure. The top floor of the tower is an octagonal control center with large single-pane windows providing a 270 degree view of the airfield. A walkway with steel railings is situated around the upper tower viewing center with ladders leading to the top of the tower. A non-historic 2-story office area and passenger terminal has been constructed around the tower and is attached to the north, west, and south sides of the structure. The terminal is an Industrial Vernacular style concrete structure with metal piping in even horizontal rows along the walls of the structure. It has a flat concrete roof and irregularly spaced and shaped glass viewing windows. There are also one-over-one fixed windows along the bays of the staff section of the terminal. The main entryway is a pair of recessed glass and steel double doors leading into the passenger waiting area.

Resource 8DU21750 is a typical example of a standardized military and airport support facility and lacks architectural distinction or engineering merit. Based on the historic context, it is the opinion of the Principal Investigator that the building is not significant under NRHP Criterion A because it is no longer indicative of a particular era and is not associated with any significant period, event, or theme. The historic fabric of the tower has been altered by additions and alterations since the time period in which it was constructed. Built after the WWII era, the tower is typical of Cold War era military facilities. Furthermore, the resource is not eligible under Criterion B because it lacks association with any person(s) significant in history. While some individuals who were stationed at Cecil Field had distinguished careers, none were identified to have achieved notoriety while stationed there (E&E 1995). Also, the resource is not eligible under Criterion C due to its lack of architectural distinction. Resource 8DU21750 is a modest example of Industrial Vernacular architecture and does not possess high artistic value. Finally, the building is not significant under Criterion D because it lacks the potential to yield further information of historical importance.

Although constructed during Cecil Field's period of Cold War era significance, the destruction of other 1950s and 1960s era buildings along with the construction of several non-historic infill buildings, including a nearby hangar built in 2012 (**Figure 7**), interrupts the historic setting,







Figure 6. Resource 8DU21750, Cecil Airport Traffic Control Tower, facing northeast (top left), facing northwest (top right), facing west (bottom).





Figure 7. Modern hangar, built in 2012 just north of Resource 8DU21750, overview with tower in background (top), east elevation (bottom).

rhythm, and feeling that Resource 8DU21750 had with the greater Cecil Airport. Therefore, it is the opinion of the Principal Investigator that Resource 8DU21750 lacks the minimum criteria for listing in the NRHP, either individually or as a contributing resource to a historic district.

8DU21751, Cecil Airport Fire Station (Building 72)

Resource 8DU21715 is a newly recorded building located at Cecil Airport in section 22 of Township 3 South, Range 24 East, as shown on the 1994 Fiftone, Fla USGS quadrangle map (see Figures 4 and 5). It was constructed in 1953 and is situated in the southeastern portion of the airfield. It is a one-story Industrial Vernacular building with an irregular plan situated on a concrete slab on-grade foundation (Figure 8). The exterior walls are concrete block and the main four-bay garage features a low sloped side-gable roof, and the north section of the building has a flat roof with metal

Fenestration consists of three one-over-one pane windows along the south elevation of the north section of the building and three on the north elevation of the north section. All have simple concrete sills. Four full height garage bays with metal rolling doors are located on the east elevation and three on the west elevation of the south section of the building. Two hinged metal doors are located along both ends of the north section of the facility, one on the east elevation and one on the north elevation. A sheet metal enclosed shed-roof addition is located along the building's south elevation with metal double-doors opening to the south, a double fixed pane window on the west elevation and a recessed open area supported by wood piers along the east portions of the addition.

Resource 8DU21751 is a typical example of a standardized military and airport support facility and lacks architectural distinction or engineering merit. Based on the historic context, it is the opinion of the Principal Investigator that the building is not significant under NRHP Criterion A because it is not indicative of a particular era and is not associated with any significant period, event, or theme. Furthermore, the resource is not eligible under Criterion B because it lacks association with any person(s) significant in history. Also, the resource is not eligible under Criterion C due to its lack of architectural distinction. Resource 8DU21751 is a modest example of Industrial Vernacular architecture and does not possess high artistic value. Finally, the building is not significant under Criterion D because it lacks the potential to yield further information of historical importance.

Although constructed during Cecil Airport's period of Cold War era significance, Resource 8DU21751's non-historic additions, such as new garage doors and windows, lessen its integrity of materials, worksmanship, and feeling. The destruction of other 1950s and 1960s era buildings along with the construction of several non-historic infill buildings interrupts the historic setting, rhythm, and feeling that Resource 8DU21751 had with the greater Cecil Airport. Therefore, it is the opinion of the Principal Investigator that Resource 8DU21751 lacks the minimum criteria for listing in the NRHP, either individually or as a contributing resource to a historic district.









Figure 8. Resource 8DU21751, Cecil Airport Fire Station, facing northeast (top left), facing west (top right), facing southwest (bottom left), and facing east (bottom right).

8DU21752, Quonset Hut (Building 177)

Resource 8DU21752 is a newly recorded building located at Cecil Airport in section 22 of Township 3 South, Range 24 East, as shown on the 1994 Fiftone, Fla USGS quadrangle map (see Figures 4 and 5). The structure is a Quonset hut, constructed sometime in the 1950s located on the southeastern portion of the airfield. The one-story steel-frame building is rectangular in plan and is situated on a concrete slab-on-grade foundation. The hut is a full-arch rib construction clad in corrugated metal panels with no sidewalls. The structure is painted white. Fenestration consists of two vents, one over each of the entry doors. There are no windows on the structure. Open bay entryways entrances are located along the north and south elevations, with the one on the north elevation enclosed and no longer operational. The entry door on the south elevation is a mechanical roll-up door. There is also a metal door on the north elevation beside the enclosed former central bay opening (Figure 9).

Resource 8DU21752 is a typical example of a standardized military and airport support facility and lacks architectural distinction or engineering merit. Based on the historic context, it is the opinion of the Principal Investigator that the building is not significant under NRHP Criterion A









Figure 9. Resource 8DU17252, Quonset Hut, facing southwest (top left), facing south (top right), facing north (bottom left), facing northeast (bottom right).

because it is not indicative of a particular era and is not associated with any significant period, event, or theme. Furthermore, the resource is not eligible under Criterion B because it lacks association with any person(s) significant in history. Also, the resource is not eligible under Criterion C due to its lack of architectural distinction. Resource 8DU21752 is a modest example of Industrial Vernacular architecture and does not possess high artistic value. Finally, the building is not significant under Criterion D because it lacks the potential to yield further information of historical importance.

Although constructed during Cecil Airport's period of Cold War era significance, the destruction of other 1950s and 1960s era buildings along with the construction of several non-historic infill buildings interrupts the historic setting, rhythm, and feeling that Resource 8DU21752 had with the greater Cecil Airport. Therefore, it is the opinion of the Principal Investigator that Resource 8DU21751 lacks the minimum criteria for listing in the NRHP, either individually or as a contributing resource to a historic district.

CONCLUSION AND RECOMMENDATIONS

In March 2015, SEARCH conducted a Historic Architectural Resource Assessment of the Cecil Airport ATCT APE in Duval County, Florida in support of the Jacksonville Aviation Authority's proposed construction of a replacement ATCT as a replacement to the existing ATCT (Resource (8DU21750/Building No. 82). The assessment resulted in the identification and evaluation of three historic resources (8DU21750-8DU21752) within the Cecil Airport ATCT APE.

Each of the three historic resources are examples of standardized military support facilities and lack architectural distinction or engineering merit. Background research did not reveal any information to indicate that any of these resources are closely associated with any specific activities, events, or persons significant within the context of Cecil Airport. All three resources evaluated within the Cecil Airport ATCT APE lack the architectural distinction and the significant historical associations necessary to be considered for listing in the NRHP and are recommended ineligible. The current assessment did not identify any existing or potential NRHP districts within, or intersecting, the APE.

In summary, it is the opinion of the Principal Investigator that construction of the replacement Cecil Airport ATCT will have no effect on cultural resources listed or eligible for listing in the NRHP. No further work is recommended.

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APPENDIX A.

FMSF RESOURCE FORMS

Page 1

☑ Original ☐ Update



HISTORICAL STRUCTURE FORM FLORIDA MASTER SITE FILE

Version 4.0 1/07

S ite #8	DU21750	
Field Date	3-27-2015	
Form Date	4-1-2015	
Recorder #		

Shaded Fields represent the minimum acceptable level of documentation. Consult the *Guide to Historical Structure Forms* for detailed instructions.

Site Name(s) (address if none) _Cecil Airport Airport T Survey Project Name Historic Architectural Surve	raffic Cntrl Twr	Multiple Listing (DHR only) Survey # (DHR only)
National Register Category (please check one) ⊠building Ownership: ☐private-profit ☐private-nonprofit ☐private-individual [□structure □district □site □d	object
LOC	CATION & MAPPING	
Address: Street Number Direction Street Name Cross Streets (nearest / between)	Street Type Way	Suffix Direction
USGS 7.5 Map Name FIFTONE	U SGS Date <u>1994</u> P lat	or Other Map
USGS 7.5 Map Name FIFTONE City / Town (within 3 miles) Jacksonville FL In		
Township <u>as</u> Range <u>24E</u> Section <u>23</u> 1/4	section: □NW □SW □SE □I	NE Irregular-name:
Subdivision Name	Landgrant Rlock	Lot
Tax Parcel # Unknown Subdivision Name UTM Coordinates: Zone 16 17 Easting	Northing	L UI
Other Coordinates: X: Y: Y:	Coordinate System & Da	atum
Name of Public Tract (e.g., park)		
	HISTORY	
Original Use Air Force/Army/Navy/Military base Current Use Airport	From (year): 1999	
	Original address	10 (year)
Alterations: New Ino Tunknown Date:	Nature New windows, equi	pment added
Additions:	_ Nature _ Office building a	idded to tower
Architect (last name first):	Builder (last name first):	
Is the Resource Affected by a Local Preservation Ordinance	DESCRIPTION	
Style Industrial Vernacular		Number of Stories 6
Exterior Fabric(s) 1. Concrete		
Roof Type(s) 1. Flat	2	3
Roof Material(s) 1. Other Roof secondary strucs. (dormers etc.) 1.	. 2	3
Windows (types, materials, etc.) The windows are all si	Z ngle pane non-sliding window	ws. There are also the large single
pane windows that make up the towers pinnacle		
Distinguishing Architectural Features (exterior or interior ornamer	its) <u>N/A</u>	
Ancillary Features / Outbuildings (record outbuildings, major lands		ed.) The tower is attached to a main
facility where the airport offices are locate	ed	
DHR USE ONLY O	FFICIAL EVALUATION	DHR USE ONLY
NR List Date SHPO – Appears to meet criteria for NR	listing: □yes □no □insufficient in	nfo Date Init
KEEPER – Determined eligible:	□yes □no	Date
☐Owner Objection NR Criteria for Evaluation: ☐a ☐b	ЩС Ща (see <i>National Register Bi</i>	<i>uiieiiii 15</i> , β. <i>2</i>)

HISTORICAL STRUCTURE FORM

Site #8 _ DU21750

DESCRIPTION (continued)
Chimney: Noo_ Chimney Material(s): 1
Foundation Material(s): 1. Concrete, Generic 2. Main Entrance (stylistic details) The main entrance to the facility is a set of metal frame glass double doors with a recessed entryway.
Porch Descriptions (types, locations, roof types, etc.)
Condition (overall resource condition): Condition (overall resource condition): Condition Cond
Archaeological Remains \toCheck if Archaeological Form Completed
RESEARCH METHODS (check all that apply)
☑FMSF record search (sites/surveys)
OPINION OF RESOURCE SIGNIFICANCE
Appears to meet the criteria for National Register listing individually? Appears to meet the criteria for National Register listing as part of a district? Explanation of Evaluation (required, whether significant or not; use separate sheet if needed) Structure does not meet any of the Criterion for recognition under the NRHP Standards. There have also been changes to the historic fabric of the structure since its creation.
Area(s) of Historical Significance (see <i>National Register Bulletin 15</i> , p. 8 for categories: e.g. "architecture", "ethnic heritage", "community planning & development", etc.) 1
2 4 6
DOCUMENTATION
Accessible Documentation Not Filed with the Site File - including field notes, analysis notes, photos, plans and other important documents Document type All materials at one location Maintaining organization Southeastern Archaeological Research File or accession #'s 3373_15035P
2) Document type Maintaining organization File or accession #'s
RECORDER INFORMATION
Recorder Name Cothran, Drew Affiliation Southeastern Archaeological Research Recorder Contact Information 315 NW 138 Terr, Newberry, FL 32669/352-333-0049/352-333-0069/dcothran@searchinc.com

Required Attachments

- **1** USGS 7.5' MAP WITH STRUCTURE LOCATION PINPOINTED IN RED
- 2 LARGE SCALE STREET, PLAT OR PARCEL MAP (available from most property appraiser web sites)
- ❸ PHOTO OF MAIN FACADE, ARCHIVAL B&W PRINT OR DIGITAL IMAGE FILE

If submitting an image file, it must be included on disk or CD <u>AND</u> in hard copy format (plain paper is acceptable). Digital image must be at least 1600 x 1200 pixels, 24-bit color, jpeg or tiff.



DU21750_a_Facing North



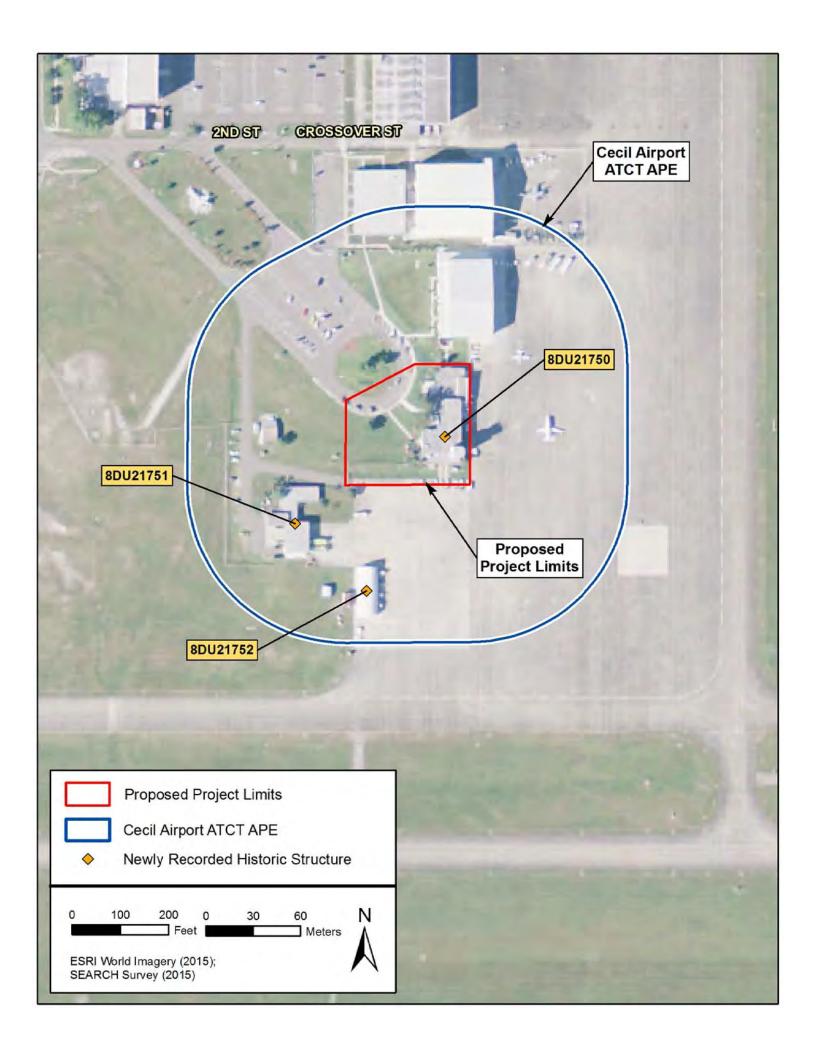
DU21750_c_Facing West

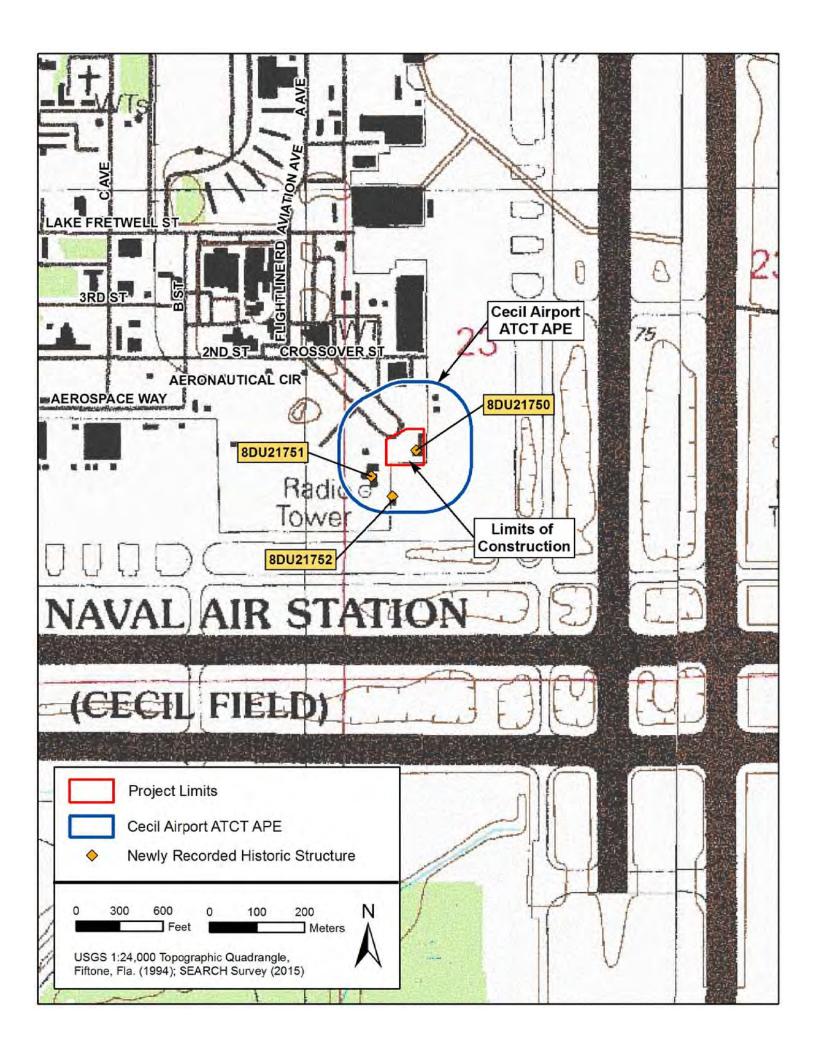


DU21750_b_Facing Northeast



DU21750_d_Facing Northwest





Page 1

☑ Original ☐ Update



HISTORICAL STRUCTURE FORM FLORIDA MASTER SITE FILE

Version 4.0 1/07

S ite #8	DU21751	
Field Date	3-27-2015	
Form Date	4-1-2015	
Recorder #		

Shaded Fields represent the minimum acceptable level of documentation. Consult the *Guide to Historical Structure Forms* for detailed instructions.

Site Name(s) (address if none)	
Street Number Direction Street Name Street Type	r Map unty Duval egular-name: Lot
HISTORY	
Construction Year:1953 _	(year): 2015 (year):
Is the Resource Affected by a Local Preservation Ordinance? ☐yes ☐no ☑unknown Describe	
DESCRIPTION	
Style Industrial Vernacular Exterior Plan Irregular Exterior Fabric(s) 1. Concrete block 2. Aluminum 3 Roof Type(s) 1. Gable 2. 3 Roof Material(s) 1. Sheet metal:corrugated 2. 3 Roof secondary strucs. (dormers etc.) 1. 2. 2. 3 Windows (types, materials, etc.) The few windows are all single pane non-sliding windows	3 3
windowless Distinguishing Architectural Features (exterior or interior ornaments) N/A	
Ancillary Features / Outbuildings (record outbuildings, major landscape features; use continuation sheet if needed.) Nor DHR USE ONLY OFFICIAL EVALUATION NP List Data SHPO Appears to most criteria for NP listing: Those Tipe Tipe (fiscing) info	DHR USE ONLY
NR List Date SHPO – Appears to meet criteria for NR listing: ☐yes ☐no ☐insufficient info KEEPER – Determined eligible: ☐yes ☐no NR Criteria for Evaluation: ☐a ☐b ☐c ☐d (see National Register Bulletin 15)	Date Init Date 5, p. 2)

HISTORICAL STRUCTURE FORM

Site #8 _DU21751

DESCRIPTION (continued)
Chimney: Noo_Chimney Material(s): 1
Condition (overall resource condition): Excellent
RESEARCH METHODS (check all that apply)
☑FMSF record search (sites/surveys) ☐ library research ☐ building permits ☐ Sanborn maps ☐FL State Archives/photo collection ☐ city directory ☒ occupant/owner interview ☒ plat maps ☐ property appraiser / tax records ☒ newspaper files ☐ neighbor interview ☐ Public Lands Survey (DEP) ☒ cultural resource survey (CRAS) ☐ historic photos ☐ interior inspection ☐ HABS/HAER record search ☐ other methods (describe) ☐ occupant/owner interview ☐ Public Lands Survey (DEP)
Bibliographic References (give FMSF manuscript # if relevant, use continuation sheet if needed)
OPINION OF RESOURCE SIGNIFICANCE
Appears to meet the criteria for National Register listing individually? Appears to meet the criteria for National Register listing as part of a district? Explanation of Evaluation (required, whether significant or not; use separate sheet if needed) Structure does not meet any of the Criterion for recognition under the NRHP Standards. There have also been changes to the historic fabric of the structure since its creation.
Area(s) of Historical Significance (see <i>National Register Bulletin 15</i> , p. 8 for categories: e.g. "architecture", "ethnic heritage", "community planning & development", etc.)
1
DOCUMENTATION
Accessible Documentation Not Filed with the Site File - including field notes, analysis notes, photos, plans and other important documents 1) Document type All materials at one location Maintaining organization Southeastern Archaeological Research Document description Photos, maps, notes, research File or accession #'s 3373_15035P 2) Document type Maintaining organization
Document description File or accession #'s
RECORDER INFORMATION
Recorder Name Cothran, Drew Affiliation Southeastern Archaeological Research Recorder Contact Information (address / phone / fax / e-mail) Affiliation Southeastern Archaeological Research Southeastern Archaeological Research Accorder Contact Information (address / phone / fax / e-mail)

Required Attachments

- **1** USGS 7.5' MAP WITH STRUCTURE LOCATION PINPOINTED IN RED
- **❷ LARGE SCALE STREET, PLAT OR PARCEL MAP** (available from most property appraiser web sites)
- **3** PHOTO OF MAIN FACADE, ARCHIVAL B&W PRINT <u>OR</u> DIGITAL IMAGE FILE

If submitting an image file, it must be included on disk or CD <u>AND</u> in hard copy format (plain paper is acceptable). Digital image must be at least 1600 x 1200 pixels, 24-bit color, jpeg or tiff.



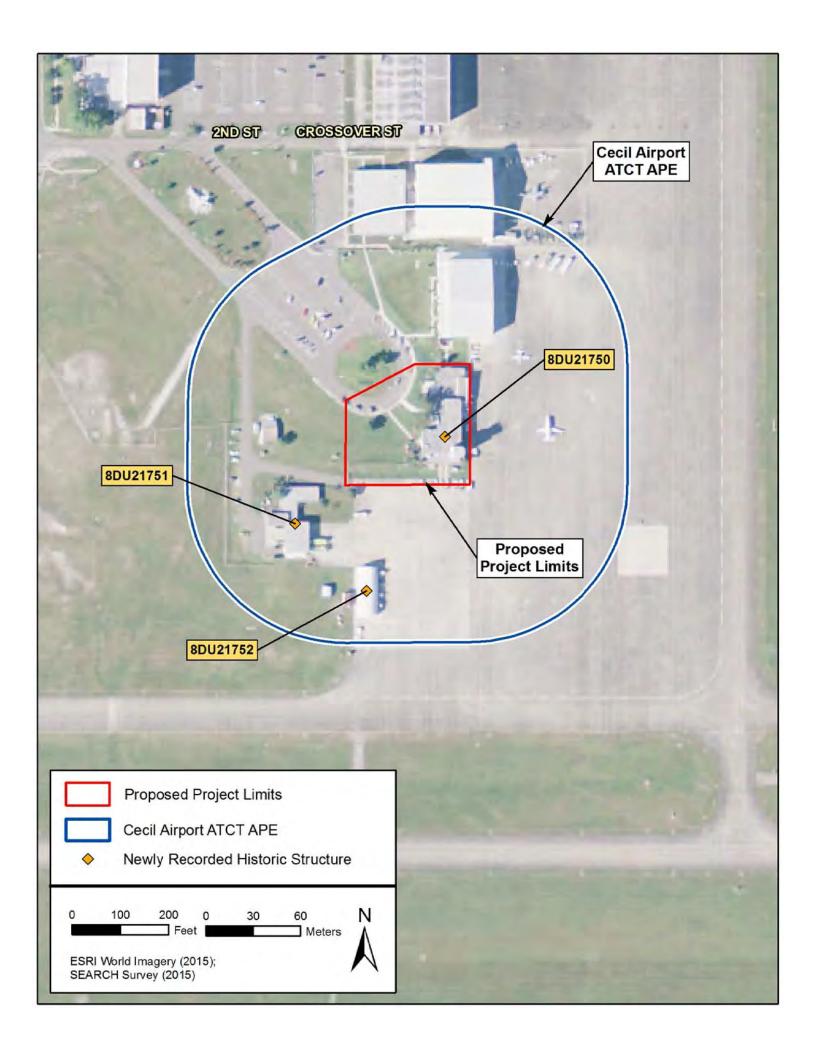


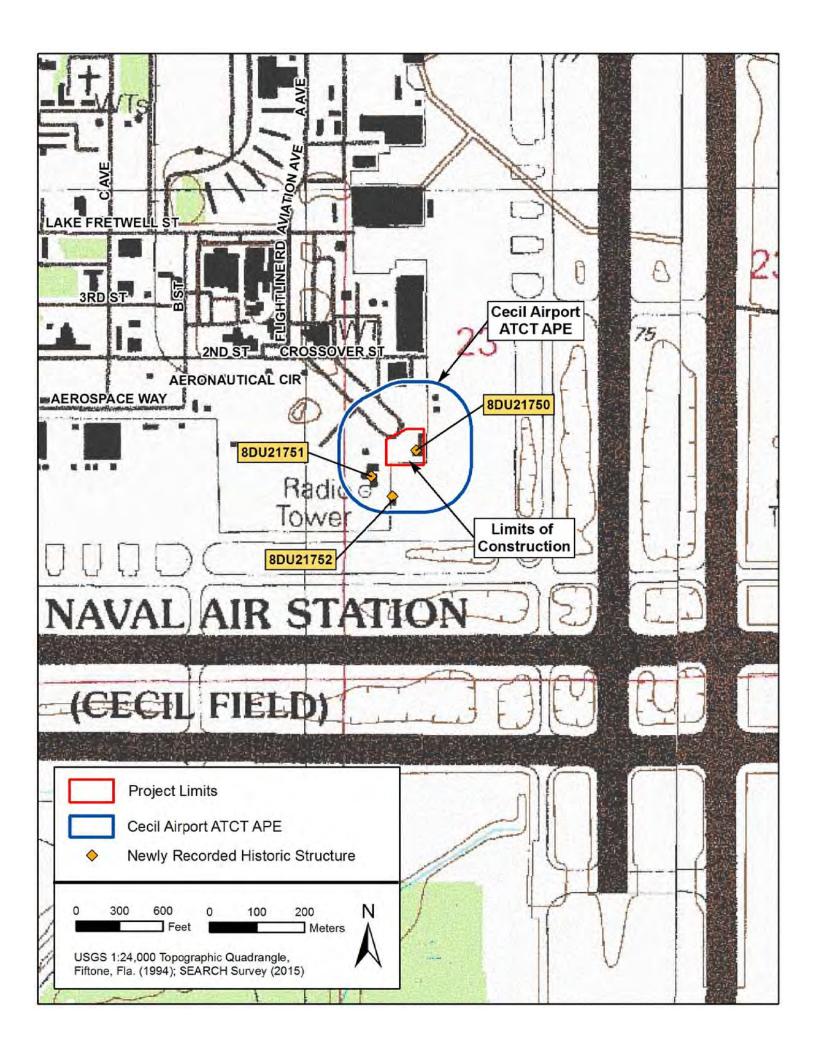
DU21751_a_Facing West DU21751_b_Facing East





DU21751_c_Facing North DU21751_d_Facing Southwest





Page 1

☑ Original ☐ Update



HISTORICAL STRUCTURE FORM FLORIDA MASTER SITE FILE

Version 4.0 1/07

S ite #8	DU21752			
Field Date	3-27-2015			
Form Date	4-1-2015			
Recorder #				

Shaded Fields represent the minimum acceptable level of documentation. Consult the *Guide to Historical Structure Forms* for detailed instructions.

Site Name(s) (address if none) Cecil Field Quonset Hu Survey Project Name Historic Architectural Survey National Register Category (please check one) ☑ building Ownership: ☐ private-profit ☐ private-individual	□structure □district □site □object	
Address: Building177 Unknown Cross Streets (nearest / between) Near Simpson Way USGS 7.5 Map Name FIFTONE City / Town (within 3 miles) Jacksonville GA Ir Township 3s Range 24E Section 23 % Tax Parcel # Unknown Subdivision Name UTM Coordinates: Zone 16 17 Easting 1 Other Coordinates: X: Y: Name of Public Tract (e.g., park)	USGS Date 1994 Plat or Othen City Limits? I yes no	r Map
	HISTORY	
Original Use Current Use Other Use Moves: yes Ino Innknown Date: Alterations: yes Ino Innknown Date:	From (year): 1968 To From (year): To Original address Nature Nature Builder (last name first):	(year): 2015 (year):
Is the Resource Affected by a Local Preservation Ordinano	ce? □yes □no ⊠unknown Describe	
	DESCRIPTION	
StyleIndustrial Vernacular Exterior Fabric(s) 1Aluminum Roof Type(s) 1Other Roof Material(s) 1Other Roof secondary strucs. (dormers etc.) 1	Exterior Plan Rectangular 2	3 3
Distinguishing Architectural Features (exterior or interior orname	ents) N/A	
Ancillary Features / Outbuildings (record outbuildings, major land		DHR USE ONLY
l	R listing: yes no insufficient info	Date Init Date

HISTORICAL STRUCTURE FORM

Site #8 _DU21752

DESCRIPTION (continued)				
Chimney: Noo_ Chimney Material(s): 1				
Porch Descriptions (types, locations, roof types, etc.)				
Condition (overall resource condition): Condition (overall resource condition):				
RESEARCH METHODS (check all that apply)				
 ☑FMSF record search (sites/surveys) ☐ Ilibrary research ☐ Duilding permits ☐ Sanborn maps ☐ Sanborn maps ☐ Duilding permits ☐ Sanborn maps ☐ Public Lands Survey (DEP) ☐ Cocupant/owner interview ☐ Public Lands Survey (DEP) ☐ Cocupant/owner interview ☐ Public Lands Survey (DEP) ☐ HABS/HAER record search ☐ Other methods (describe) ☐ Bibliographic References (give FMSF manuscript # if relevant, use continuation sheet if needed) 				
OPINION OF RESOURCE SIGNIFICANCE				
Appears to meet the criteria for National Register listing individually? Appears to meet the criteria for National Register listing as part of a district? Explanation of Evaluation (required, whether significant or not; use separate sheet if needed) Structure does not meet any of the Criterion for recognition under the NRHP Standards.				
Area(s) of Historical Significance (see National Register Bulletin 15, p. 8 for categories: e.g. "architecture", "ethnic heritage", "community planning & development", etc.) 1				
DOCUMENTATION				
Accessible Documentation Not Filed with the Site File - including field notes, analysis notes, photos, plans and other important documents 1) Document type All materials at one location Maintaining organization Document description Photos, maps, notes, research File or accession #'s 3373_15035P 2) Document type Maintaining organization Document description File or accession #'s File or acces				
RECORDER INFORMATION				
Recorder Name Cothran, Drew Affiliation Southeastern Archaeological Research Recorder Contact Information 315 NW 138 Terr, Newberry, FL 32669/352-333-0049/352-333-0069/dcothran@searchinc.com				

Required Attachments

- **1** USGS 7.5' MAP WITH STRUCTURE LOCATION PINPOINTED IN RED
- **②** LARGE SCALE STREET, PLAT OR PARCEL MAP (available from most property appraiser web sites)
- 13 PHOTO OF MAIN FACADE, ARCHIVAL B&W PRINT OR DIGITAL IMAGE FILE

If submitting an image file, it must be included on disk or CD <u>AND</u> in hard copy format (plain paper is acceptable). Digital image must be at least 1600 x 1200 pixels, 24-bit color, jpeg or tiff.





DU21752_a_Facing Southwest

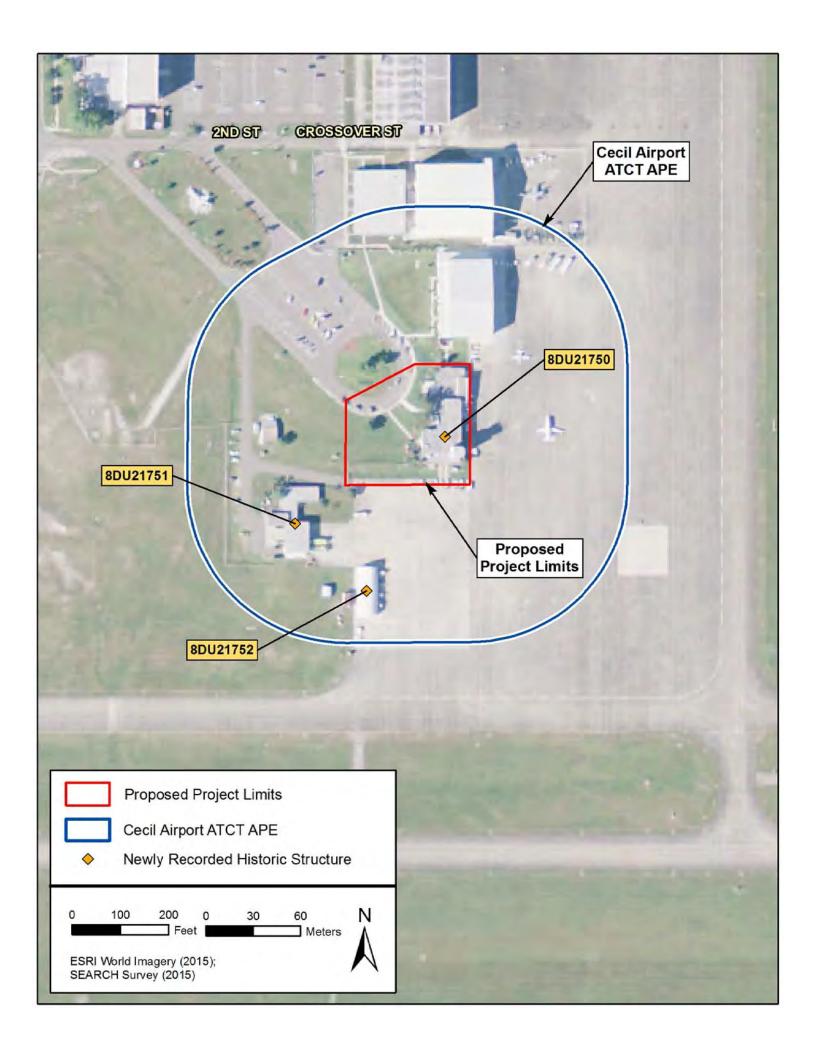
DU21752_b_Facing Northeast

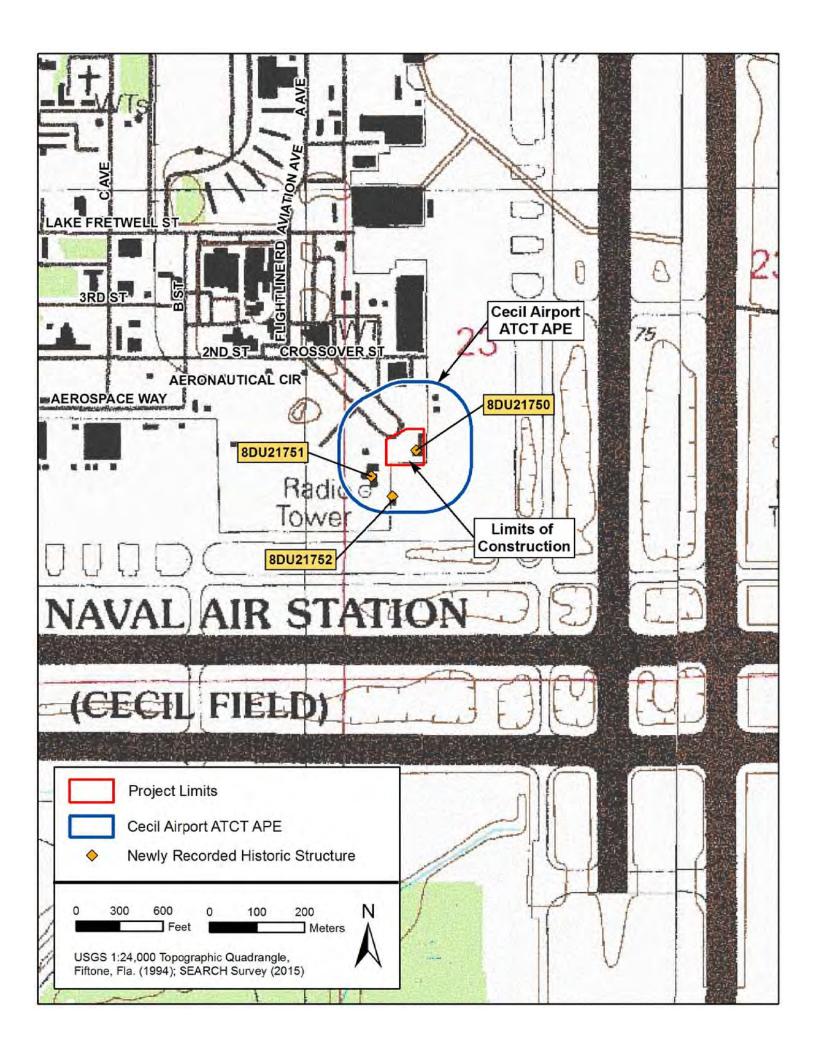




DU21752_c_Facing North

DU21752_d_Facing South





APPENDIX B.

FDHR SURVEY LOG SHEET

Ent D (FMSF only)



Survey Log Sheet

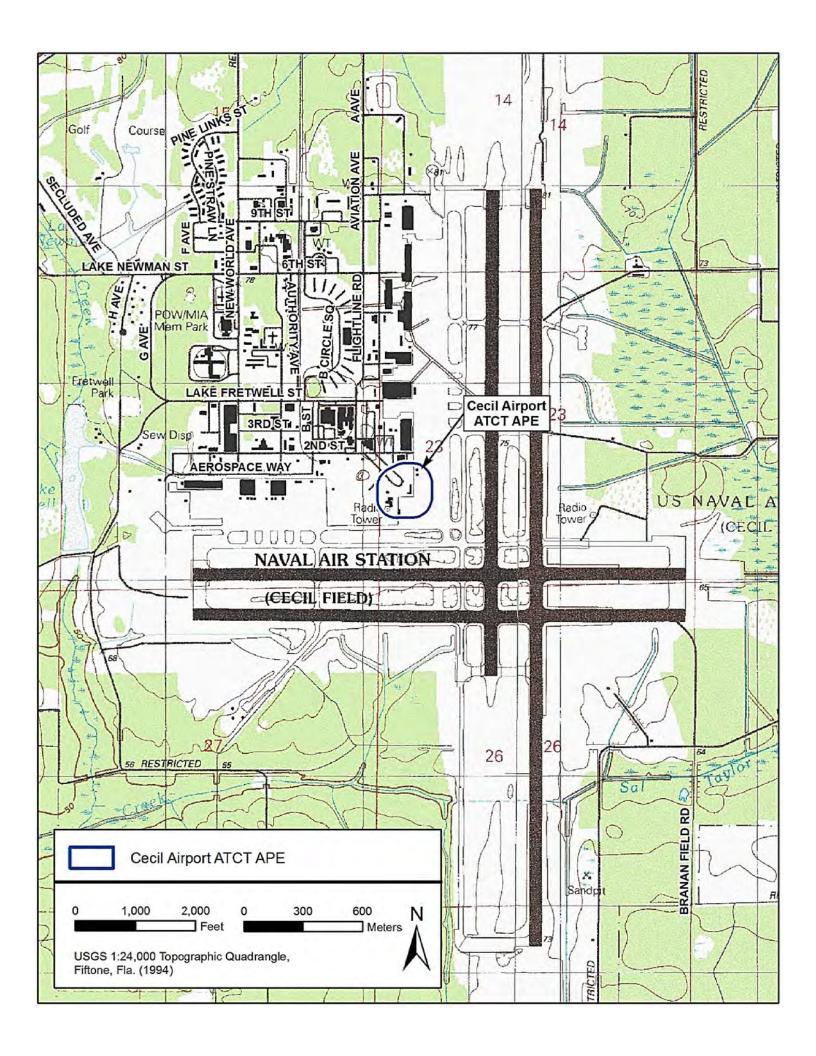
orida Master Site File

Survey # (FMSF only)

Consult Guide to the Survey Log Sheet for detailed instructions.

	Identification and I	Bibliographic Info	rmation	
Survey Project (name and project phase)	roposed replaceme	ent of Cecil A	irport, Airport Traffic Co	ontrol Tower.
Report Title (exactly as on title page) HIST	ORIC ARCHITECTUR	AL RESOURCE AS	SESSMENT OF CECIL AIRPORT	, AIRPORT
TRAFFIC CONTROL TOWER, DUVAL CO				
${f Report\ Authors}$ (as on title page, last names fin				
		Drew	4	
Publication Date (year) 2015 T	otal Number of Pages	s in Report (count te	xt, figures, tables, not site forms)	20
Publication Information (Give series, number i	n series, publisher and cit	y. For article or chapte	er, cite page numbers. Use the style of A	American Antiquity.)
On File at SEARCH, Newberry. SE	ARCH project no.	3373-15035P.		
Supervisors of Fieldwork (even if same as au				
Affiliation of Fieldworkers: Organization				
Key Words/Phrases (Don't use county name, o				
1. Cecil Airport 3. Fire	Station	5	7	
2. Air Traffic Control Tower 4. Quons	et Hut	6	8	
Survey Sponsors (corporation, government uni				
Name RS&H		Organization Sou	theastern Archaeological Research	
Address/Phone/E-mail 315 NW 138th	Terrace, Newberr	ry, FL/352-333-	0049/dcothran@searchinc.c	com
Recorder of Log Sheet _ Drew Cothran			Date Log Sheet Completed	4-16-2015
Is this survey or project a continuation of	a previous project?	⊠No □Yes:	Previous survey #s (FMSF only)	
	N	Mapping		
Counties III		1 ('f)		
Counties (List each one in which field survey wa			F	
 Duval 	_ 3		o	
۷	_ 4		D	
USGS 1:24,000 Map Names/Year of Lates	st Revision (attach addi	tional sheet if necessa	ry)	
1. Name FIFTONE	V 1004	4		Year
2. Name		-		Year
3. Name	V	6. Name		Year
	Descriptio	n of Survey Area		
Dates for Fieldwork: Start 3-27-2015		Total Area Surv	eyed (fill in one)hectares _	16_acres
Number of Distinct Tracts or Areas Surve				
If Corridor (fill in one for each) Width:	meters	feet L enat	h: kilometers	miles

Research and Field Methods					
Types of Survey (check all that apply):		⊠architectural	⊠historical/arch		
Scope/Intensity/Procedures Inc	· ·	• .		the all historic resources	
50 years and older using	Florida Master Si	te File Forms.	The result inc	cludes a Technical Memorandum	
describing historic resou	rces, background	research, and M	NRHP recommenda	tions.	
Preliminary Methods (check as many ☐Florida Archives (Gray Building) ☐Florida Photo Archives (Gray Building) ☑Site File property search ☑Site File survey search ☐other (describe):	as apply to the project as	ic ⊠I nonlocal ⊠r s at DEP) □Ii	ocal property or tax recor newspaper files iterature search Sanborn Insurance maps	ds ⊠other historic maps □ soils maps or data □ windshield survey ⊠ aerial photography	
Archaeological Methods (check as n		t as a whole)			
Check here if NO archaeological meth			_		
surface collection, controlled	_	t-other screen size		ock excavation (at least 2x2 m)	
surface collection, <u>un</u> controlled shovel test-1/4"screen	□water scr □posthole t			il resistivity agnetometer	
shovel test-1/8" screen	auger test			le scan sonar	
shovel test 1/16"screen	☐ coring			destrian survey	
shovel test-unscreened	☐test excav	ration (at least 1x2 m)	□un	known	
other (describe):					
□ Check here if NO historical/architectu □ building permits □ commercial permits □ interior documentation □ other (describe):	□ demolition permits □ exposed ground inspecte ⊠ local property records	d 🗵	neighbor interview occupant interview occupation permits	subdivision maps tax records unknown	
	Survey Resul	ts (cultural resour	ces recorded)		
Site Significance Evaluated? ⊠Y	Yes □No				
C ount of Previously Recorded Site	s 0	Count of Newly	Recorded Sites	3	
Previously Recorded Site #'s with Site File Update Forms (List site #'s without "8". Attach additional pages if necessary.)					
Newly Recorded Site #'s (Are all originals and not updates? List site #'s without "8". Attach additional pages if necessary.) DU21750-DU21752					
Site Forms Used: Site File Paper Form Site File Electronic Recording Form					
REQUIRED: ATTACH PLOT OF SURVEY AREA ON PHOTOCOPY OF USGS 1:24,000 MAP(S)					
CURO HEE ONLY					
SHPO USE ONLY Origin of Report: 872 CARL	□UW □1A32 #	SHPO USE ONLY		SHPO USE ONLY Contract Avocational	
☐Grant Project #		_ □Compliance Revi	ew: CRAT#		
□ Overview □ E	Type of Document: Archaeological Survey Historical/Architectural Survey Marine Survey Cell Tower CRAS Monitoring Report Overview Excavation Report Multi-Site Excavation Report Structure Detailed Report Library, Hist. or Archival Doc				
Document Destination:		Plotability:			







EARLY COORDINATION

<u>ATTACHMENT E-1</u>

EARLY COORDINATION LETTER



March 23, 2015

<CLIENT NAME>
ATTN: <CONTACT NAME>
1234 Your Street, Suite ABC
City, State 12345

RE: Cecil Airport – Environmental Assessment for the Construction of a Replacement Airport

Traffic Control Tower

Dear < Mr./Ms. CONTACT LAST NAME>,

The Jacksonville Airport Authority (JAA) is preparing an Environmental Assessment (EA) for approval by the Federal Aviation Administration (FAA) to construct a replacement Airport Traffic Control Tower (ATCT) at Cecil Airport. The airport location and project location are shown in Figure 1. Cecil Airport is located in the southwest portion of Duval County, Florida and is owned and operated by the JAA. The project site is located within Section 23, Township 3S and Range 24E.

In accordance with the National Environmental Policy Act (NEPA) and FAA Orders 1050.1E, *Policies and Procedures for Considering Environmental Impacts* and 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions of Airport Actions*, the EA will analyze the potential environmental effects of the Proposed Action. The proposed replacement ATCT, located approximately 140 feet west of the existing ATCT, would be a visual flight rules (VFR) ATCT and would operate as part of the FAA's Contract Tower Program. The replacement ATCT will be designed to initially accommodate two Air Traffic Control Specialist (ATCS) positions, with space for up to two more positions.

As shown Figure 2, the Proposed Action would entail the following interrelated project components:

- » Construction of a replacement ATCT that will include a control cab on top of a function shaft. The replacement ATCT will have a base of approximately 26 feet squared and would be approximately 135 feet high (above ground level);
- » Construction of a sidewalk to the proposed replacement ATCT ;and
- » Extension of the existing security fence to include the proposed replacement ATCT.



On behalf of the JAA, we are sending you this early notification packet to:

- 1. Advise your Agency of the preparation of the EA;
- 2. Request any relevant information that your agency may have regarding the project site or environs; and
- 3. Solicit early comments regarding potential environmental, social, and economic issues for consideration during the preparation of the EA.

Figure 1 and Figure 2 depicting the project location, project site, and existing facilities with the location of the Proposed Action are enclosed.

You may send any information and comments to me via email at <u>David.Alberts@rsandh.com</u> or to the address provided at the top of this letter. We would appreciate your prompt response within 30 days.

On behalf of the JAA, we would like to thank you for your interest in this project and look forward to working with you as we prepare the EA. If you have any questions or need additional information regarding Proposed Action or EA, please do not hesitate to contact me at (904) 256-2469.

Sincerely,

David Alberts Southeast Region Environmental Service Group Leader RS&H, Inc.



36R

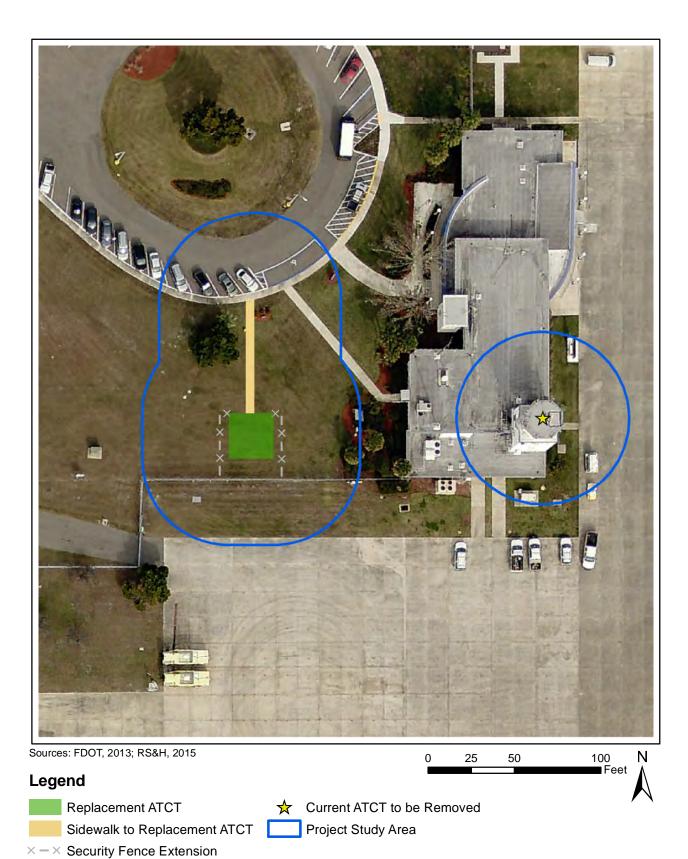
Sources: FDOT, 2013; Esri, 2015; RS&H, 2015

0 1,000 2,000 4,000 Feet

Legend

- Current ATCT Location
- Replacement ATCT Location
- Cecil Airport







Early Coordination Mailing List Cecil Airport Environmental Assessment for Replacement ATCT

FEDERAL AGENCIES

USEPA

Mr. Heinz Mueller NEPA Coordinator Region 4 U.S. Environmental Protec

U.S. Environmental Protection Agency 61 Forsyth Street Atlanta, GA 30303

USFWS

Mr. John Milio North Florida Ecological Services Office U.S. Fish and Wildlife Service 7915 Baymeadows Way, Suite 200

Jacksonville, FL 32256

FEMA

Ms. Stephanie Madson Regional Environmental Officer Region 4 Federal Emergency Management Agency 3003 Chamblee Tucker Road Atlanta, GA 30341

<u>DOI</u>

Ms. Joyce A. Stanley Regional Environmental Protection Specialist Office of Environmental Policy and Compliance U.S. Department of the Interior 75 Spring Street, S.W., Suite 1144 Atlanta, GA 30303

<u>USDA</u>

Mr. Al Oliver
District Conservationist
Lake City Service Center
Natural Resources and Conservation Service
2304 SW Main Blvd.
Lake City, FL 32025

USACE

Attn. NEPA Coordination North Florida Area Office United States Army Corps of Engineers 4070 Boulevard Center Drive, Suite 201 Jacksonville, FL 32207-2823 **NOAA-NMFS**

Attn. NEPA Coordination S.E. Region Office National Marine Fisheries Service National Oceanic and Atmospheric Administration 263 13th Avenue North St. Petersburg, Florida 33701

STATE AGENCIES

FDEP

Ms. Lauren Milligan Florida Department of Environmental Protection Office of Intergovernmental Programs 3900 Commonwealth Blvd., MS 47 Tallahassee, Florida 32399-3000

Send this letter packet electronically: Lauren.Milligan@dep.state.fl.us

FFWCC

Mr. Chris Wynn, Regional Director North Central Region Florida Fish and Wildlife Conservation Commission 3377 E. U.S. Highway 90 Lake City, FL 32055

<u>FNAI</u>

Mr. Gary Knight, Director Florida Natural Areas Inventory 1018 Thomasville Road, Suite 200-C Tallahassee, FL 32303

LOCAL AGENCIES

<u>Duval County/City of Jacksonville</u>
Ms. Kimberly Scott, M.P.A.
Director
Regulatory Compliance Department
City of Jacksonville
214 Hogan Street, N., 5th Floor
Jacksonville, FL 32202

St. Johns Water Management District
Mr. David Miracle
Director
Jacksonville Service Center
St. Johns Water Management District
7775 Baymeadows Way, Suite 102
Jacksonville, FL 32256

<u>ATTACHMENT E-2</u>

AGENCY RESPONSE LETTERS

Alberts, David

From: Milligan, Lauren < Lauren.Milligan@dep.state.fl.us>

Sent: Tuesday, March 24, 2015 11:04 AM

To: Alberts, David

Cc: Sarah Brammell; Diana Clawson

Subject: RE: Cecil Airport-Replacement ATCT_Early Coordination Letter - State Comments

Mr. David E. Alberts Southeast Region Environmental Service Group Leader RS&H, Inc. 10748 Deerwood Park Blvd South Jacksonville, FL 32256-0597

RE: Federal Aviation Administration – Scoping Notice – Jacksonville Airport Authority, Replace Air Traffic Control Tower at Cecil Airport – Jacksonville, Duval County, Florida. SAI # FL201503247234

Dear David:

Florida State Clearinghouse staff has reviewed the referenced FAA scoping notice under the following authorities: Presidential Executive Order 12372; § 403.061(42), *Florida Statutes*; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended.

Staff notes that the proposed construction activities may require the issuance or modification of an environmental resource permit (ERP) from the St. Johns River Water Management District (SJRWMD) for onsite stormwater management. Further inquiries concerning the state's permitting requirements should be directed to the SJRWMD's ERP Program staff in the Jacksonville Service Center at (904) 730-6270.

Based on the information contained in the notice and minimal project impacts, at this stage, the state has no objections to the proposed federal action. The state's continued concurrence will be based on the activity's compliance with Florida Coastal Management Program (FCMP) authorities, including federal and state monitoring of the activity to ensure its continued conformance, and the adequate resolution of any issues identified during subsequent reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting process, in accordance with Section 373.428, *Florida Statutes*, if applicable.

Thank you for the opportunity to review this public notice. Should you have any questions or need further assistance, please don't hesitate to contact me at (850) 245-2170 or Lauren.Milligan@dep.state.fl.us.

Yours sincerely,

Lauren F. Milligan

Lauren P. Milligan, Coordinator Florida State Clearinghouse Florida Department of Environmental Protection 3900 Commonwealth Blvd, M.S. 47 Tallahassee, FL 32399-3000

ph. (850) 245-2170 fax (850) 245-2190

Lauren.Milligan@dep.state.fl.us

From: Diana Clawson [mailto:DClawson@ersenvironmental.com]

Sent: Monday, March 23, 2015 1:55 PM

To: Milligan, Lauren **Cc:** Sarah Brammell

Subject: Cecil Airport-Replacement ATCT_Early Coordination Letter

Ms. Milligan,

Please find attached the Early Coordination Letter for the Cecil Airport-Environmental Assessment for the Construction of the Replacement Airport Traffic Control Tower (ATCT).

Thank you, Diana Clawson

Diana Clawson Administrative Assistant



8711 Perimeter Park Blvd., Suite 1 Jacksonville, Florida 32216 Phone - 904-285-1397 Fax - 904-285-1929 www.ersenvironmental.com



Alberts, David

From: Williams, Zakia <zakia_williams@fws.gov>
Sent: Thursday, March 26, 2015 2:09 PM

To: Alberts, David

Subject: Cecil Airport Traffic Control Tower FWS log# 15-I 0186

Attachments: 20150326_fws_ltr_Cecil Airport Traffic Control Tower_concurrence.pdf

Mr. Alberts,

Please find attached the FWS concurrence for the Cecil Airport Traffic Control Tower project located in Duval county. Please let me know if you have any further questions.

Thank you

--

Zakia Williams

Fish and Wildlife Biologist

US Fish and Wildlife Service

7915 Baymeadows Way Ste. 200

Jacksonville, FL 32256

(0) 904-731-3326



On behalf of the JAA, we are sending you this early notification packet to:

- Advise your Agency of the preparation of the EA;
- 2. Request any relevant information that your agency may have regarding the project site or environs; and
- 3. Solicit early comments regarding potential environmental, social, and economic issues for consideration during the preparation of the EA.

Figure 1 and Figure 2 depicting the project location, project site, and existing facilities with the location of the Proposed Action are enclosed.

You may send any information and comments to me via email at David.Alberts@rsandh.com or to the address provided at the top of this letter. We would appreciate your prompt response within 30 days.

On behalf of the JAA, we would like to thank you for your interest in this project and look forward to working with you as we prepare the EA. If you have any questions or need additional information regarding Proposed Action or EA, please do not hesitate to contact me at (904) 256-2469.

Sincerely,

David Alberts

Southeast Region Environmental Service Group Leader

RS&H, Inc.

FWS Log No 15-I- 0186

The Proposed action is not likely to adversely affect resources protected by the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.) This finding fulfills the requirements of the Act.

Jay B. Herrington

Field Supervisor

Date



Florida Fish and Wildlife Conservation Commission

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Richard A. Corbett Chairman Tampa

Brian Yablonski Vice Chairman Tallahassee

Ronald M. Bergeron Fort Lauderdale

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Aliese P. "Liesa" Priddy Immokalee

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MyFWC.com

April 21, 2015

Mr. David Alberts
Southeast Region Environmental Service Group Leader
RS&H, Inc.
10748 Deerwood Park Boulevard S.
Jacksonville, FL 32256
David.Alberts@rsandh.com

RE: Cecil Airport Environmental Assessment for the Construction of a Replacement Airport Traffic Control Tower, Jacksonville Airport Authority Environmental Assessment (EA), Duval County, Florida

Dear Mr. Alberts:

Florida Fish and Wildlife Conservation Commission (FWC) staff has reviewed your March 2015 email requesting technical assistance as part of the early notification process in the development of the EA for the Cecil Airport project. The following comments and recommendations are provided at your request and as technical assistance in accordance with Chapter 379, Florida Statutes.

The project consists of constructing a replacement aircraft control tower approximately 140 feet west of the existing aircraft control tower at Cecil Field.

FWC staff conducted a geographic information system (GIS) analysis of the project area. No listed species were identified based on this analysis. However, the applicant may wish to verify that no listed species would be affected by conducting listed species-specific surveys to be completed prior to any clearing or development. Species-specific wildlife surveys are time sensitive, and FWC staff recommends that all wildlife surveys follow established survey protocols approved by the U.S. Fish and Wildlife Service and the FWC. Surveys should also be conducted by qualified biologists with recent documented experience for each potential species. Basic guidance for conducting wildlife surveys may be found in the Florida Wildlife Conservation Guide (http://myfwc.com/conservation/value/fwcg/).

We appreciate the opportunity to provide input on this project. If you need any further assistance, please do not hesitate to contact Jane Chabre either by phone at (850) 410-5367 or at FWCConservationPlanningServices@MyFWC.com. If you have specific technical questions regarding the content of this letter, please contact Theodore Hoehn at (850) 488-8792 or by email at ted.hoehn@MyFWC.com.

Sincerely,

Jennifer D. Goff

Land Use Planning Program Administrator Office of Conservation Planning Services

jdg/th

Cecil Airport Replacement Tower JAA EA Notification 20875 042115



7775 Baymeadows Way • Suite 102 • Jacksonville, FL 32256 • (904) 730-6270 • Fax (904) 730-6292

On the Internet at floridaswater.com.

April 10, 2015

RS&H 10748 Deerwood Park Blvd S. Jacksonville, FL 32256

ATTN: Mr. David Alberts

RE: Cecil Airport - Airport Traffic Control Tower

Permit No. PDEX-031-70452-81

(Please reference permit and item numbers on all correspondence.)

Dear Mr. Alberts:

The proposed work lies within the limits of the conceptual ERP 70452-45 as permitted by this agency on April 27, 2012. Construction within those limits is considered to be part of a larger common plan of development and will therefore require a permit from this agency.

If you have any questions, please feel free to contact me at 904.448.7939 or jreindl@sjrwmd.com.

Sincerely,

Jeffrey A. Reindl Professional Engineer

cc: RIM

Douglas Burnett

ST. AUGUSTINE



Good Morning Ms. Lane,

Thank you for contacting us about the proposed Cecil Airport Air Traffic Control Tower, Duval County, Florida project. We have reviewed the information FAA provided and the proposed area of potential effect does fall within the Seminole Tribe of Florida's area of interest. We have no comments or information to provide you at this time, but please keep us informed as the project progresses. We look forward to engaging in formal consultation with the lead Federal agency at the appropriate time per Section 106 of the National Historic Preservation Act.

Regards,

Bradley M. Mueller, MA Compliance Supervisor Tribal Historic Preservation Office Seminole Tribe of Florida

Tel: 863-983-6549 ext 12245

Fax: 863-902-1117

Email: <u>bradleymueller@semtribe.com</u>

Web: www.stofthpo.com

<u>ATTACHMENT F</u>

AGENCY AND PUBLIC REVIEW OF THE DRAFT FOCUSED EA

THE FLORIDA TIMES-UNION Jacksonville, FL Affidavit of Publication

Florida Times-Union

JACKSONVILLE AVIATION AUTHORITY ATTN ACCOUNTS RECEIVABLES 14201 PECAN PARK RD JACKSONVILLE FL 32218

Reference: 1000250704 Ad Number: C16427226

State of Florida County of Duval

Before the undersigned authority personally appeared Sharon Walker who on oath says he/she is a Legal Advertising Representative of The Florida Times-Union, a daily newspaper published in Duval County, Florida; that the attached copy of advertisement is a legal ad published in The Florida Times-Union. Affiant further says that The Florida Times-Union is a newspaper published in Duval County, Florida, and that the newspaper has heretofore been continuously published in Duval County, Florida each day, has been entered as second class mail matter at the post office in Jacksonville, in Duval County, Florida for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission, or refund for the purpose of securing this advertisement for publication in said newspaper.

PUBLISHED ON:

10/28/2015

Notice of Availability
Jacksonville Aviation Authority / Cecil Airport
Draft Facused Environmenta Assessment
Replacement Airport Traffic Control Tower at Cecil Airport,
Jacksonville FL

The Jacksonville Aviation Authority (JAA) has prepared a Draft Focused Environmental Assessment (EA) for the proposed replacement airport traffic control tower (ATCT) at Cecil Airport, Jacksonville, FL. The Draft Focused EA was prepared in accordance with the National Environmental Policy Act (NEPA) and Federal Aviation Administration (FAA) regulations.

The results of the Draft Focused EA Indicate there are no significant adverse impacts associated with the proposed actions. Per federal Executive Orders 11999, Protection of Wetlands, and 11988, Floodplain Management, public notice is hereby given that the above referenced project would be located within wetlands and the 100-year floodplain. The Draft Focused EA includes an analysis of prudent or feasible alternatives and potential impacts and mitigation measures, as appropriate.

The Draft Focused EA is available for public review at www.flylacksonville.com and during regular business hours at Cecil Airport, 13365 Aeronautical Circle, Jacksonville, FL 32221 and the Jacksonville Public Library Argyle Branch, 7973 Old Middleburg Road South, Jacksonville, FL 32222.

Comments on the Draft Focused EA will be accepted for 30 days from the date of this notice by the JAA. Include your address, phone number, e-mail address, or other personal identifying information. Be advised that your entire comment- including your personal identifying information-may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so. Comments should be submitted to JAA, Attn. Mr. Todd Lindner, 14201 Pecan Park R o a d , J o c k s o n v i i l e , F l o r i d o 3 2 2 1 8 , o r todd.Indner@ftyiacksonville.com.

15 NOV 2 PM3:57

FILED ON:

10/28/2015

Name: Sharon Walker

Title: Legal Advertising Representative

In testimony whereof, I have hereunto set my hand and affixed my official Seal, the day and year

aforesaid.

NOTARY:

DIANA A CRUZ-MOORE

MY COMMISSION LEE 24520

EXPIRES July 07, 2016

FlondsNoteryService.com

Heath, Natalie

From: Milligan, Lauren < Lauren. Milligan@dep.state.fl.us>

Sent: Friday, October 16, 2015 10:51 AM

To: Heath, Natalie Cc: Alberts, David

Subject: RE: Draft Focused EA for a Replacement Airport Traffic Control Tower at Cecil Airport -

State Clearance Letter

Attachments: SJRWMD Notice Permit Required.pdf

Ms. Natalie Heath, AICP Environmental Specialist RS&H, Inc. 10748 Deerwood Park Blvd South Jacksonville, FL 32256-0597

RE: Federal Aviation Administration – Draft Focused Environmental Assessment for a Replacement Airport Traffic Control Tower at Cecil Airport – Jacksonville, Duval County, Florida. SAI # FL201510167471C (Reference Prior SAI # FL201503247234)

Dear Natalie:

Florida State Clearinghouse staff has reviewed the referenced Draft Focused Environmental Assessment (FEA) under the following authorities: Presidential Executive Order 12372; § 403.061(42), *Florida Statutes*; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended.

As noted by the St. Johns River Water Management District (SJRWMD) in the attached letter, the proposed construction activities will require a modification of Conceptual Environmental Resource Permit # 70452-45 by the SJRWMD for onsite stormwater management. Further inquiries concerning the state's permitting requirements should be directed to the SJRWMD's ERP Program staff in the Jacksonville Service Center at (904) 448-7939.

Based on the information contained in the Draft FEA and minimal project impacts, the state has determined that, at this stage, the proposed activity is consistent with the Florida Coastal Management Program (FCMP). The state's continued concurrence will be based on the activity's compliance with FCMP authorities, including federal and state monitoring of the activity to ensure its continued conformance, and the adequate resolution of any issues identified during subsequent regulatory reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting process, in accordance with Section 373.428, *Florida Statutes*.

Thank you for the opportunity to review the draft document. Should you have any questions or need further assistance, please don't hesitate to contact me at (850) 245-2170 or Lauren.Milligan@dep.state.fl.us.

Yours sincerely,

Lauren F. Milligan

Lauren P. Milligan, Coordinator Florida State Clearinghouse Florida Department of Environmental Protection 3900 Commonwealth Blvd, M.S. 47 Tallahassee, FL 32399-3000 ph. (850) 245-2170 fax (850) 245-2190 Lauren.Milligan@dep.state.fl.us

----Original Message----

From: Heath, Natalie [mailto:Natalie.Heath@rsandh.com]

Sent: Friday, October 16, 2015 8:36 AM

To: Milligan, Lauren

Subject: Draft Focused EA for a Replacement Airport Traffic Control Tower at Cecil Airport

Good morning Lauren,

On behalf of David Alberts (RS&H) and the Jacksonville Aviation Authority, I am sending you a copy of the Draft Focused Environmental Assessment for a Replacement Airport Traffic Control Tower at Cecil Airport. Please use the link provided below to download a copy of the Draft Focused EA. If you would like CDs of this Draft Focused EA, please let me know how many and I will send them to your office.

Please contact me if you have any trouble accessing the document or any questions about the Draft Focused EA. Thank you for your assistance with this project.

Warm Regards,

Natalie

Sender: Heath, Natalie

Link: https://pd.rsandh.com/pd/Login.do?id=A0579947865&p1=x3j04tqsbgikkfijhglfbdeigj20

Sent To: Lauren Milligan

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Natalie Heath, AICP Environmental Specialist 10748 Deerwood Park Blvd South Jacksonville, FL 32256 Phone: 904-256-2219 / Fax: 904-256-2501

Phone: 904-256-2219 / Fax: 904-256-250 mailto:%7BDirectory.Sender.mail%7D







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On the Internet at floridaswater.com.

April 10, 2015

RS&H 10748 Deerwood Park Blvd S. Jacksonville, FL 32256

ATTN: Mr. David Alberts

RE: Cecil Airport - Airport Traffic Control Tower

Permit No. PDEX-031-70452-81

(Please reference permit and item numbers on all correspondence.)

Dear Mr. Alberts:

The proposed work lies within the limits of the conceptual ERP 70452-45 as permitted by this agency on April 27, 2012. Construction within those limits is considered to be part of a larger common plan of development and will therefore require a permit from this agency.

If you have any questions, please feel free to contact me at 904.448.7939 or jreindl@sjrwmd.com.

Sincerely,

Jeffrey A. Reindl Professional Engineer

cc: RIM

Douglas Burnett

ST. AUGUSTINE

Heath, Natalie

From: Williams, Zakia <zakia_williams@fws.gov>
Sent: Tuesday, October 27, 2015 11:42 AM

To: Heath, Natalie

Subject: Re: Draft Focused EA for a Replacement Airport Traffic Control Tower at Cecil Airport

(Log # 15-I-0186)

Good Morning Natalie,

After review of the EA, the FWS has determined that the replacement of the air traffic control tower "may affect, but not likely adversely affect" threatened and endangered species on the property. The proposed location for the tower does not provide suitable habitat to support the T&E species in the area. No further consultation is necessary. Please let me know if you have any further questions.

Thank you,

On Fri, Oct 16, 2015 at 9:14 AM, Heath, Natalie < Natalie. Heath@rsandh.com wrote: Good morning Zakia,

In March 2015, we sent your office an early coordination letter regarding the Jacksonville Aviation Authority's (JAA's) proposal to replace the airport traffic control tower (ATCT) at Cecil Airport (Log# 15-I-0186). On behalf of David Alberts (RS&H) and JAA, I am sending you a copy of the Draft Focused Environmental Assessment (EA) for the replacement ATCT for your review and comment. Please use the link provided below to download the document.

Please contact me if you have any trouble downloading the document or if you have questions regarding the Draft Focused EA.

Warm Regards,

Natalie

Sender: Heath, Natalie

Link: https://pd.rsandh.com/pd/Login.do?id=A0579948276&p1=dej02bisbgikkfjdihlfbgifek20

Sent To: <u>zakia_williams@fws.gov</u>

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http://www.rsandh.com/go/bcaOctober is Breast Cancer Awareness Month. http://www.rsandh.com/go/bca.

--

Zakia Williams

>>>>>>>>>>

Fish and Wildlife Biologist
US Fish and Wildlife Service
7915 Baymeadows Way Ste. 200
Jacksonville, FL 32256
(0) 904-731-3326