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## **Appendix O – Public and Agency Review of the Draft EA**

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This appendix (Appendix O) includes details of the Public Meeting held May 1, 2024, and provides a summary of the public and agency comments received on the 2024 Draft Short Form Environmental Assessment (EA) including Oakland/Southwest Airport (Airport or Y47) responses.

## **1. Public Meeting Details**

A Public Meeting was held at Salem-South Lyon District Library on May 1, 2024, from 5:30 PM to 7:00 PM. The purpose of the Public Meeting was to present the Preferred Alternative and its associated impacts to the public and receive written comments on the proposed action. Public comments received have been incorporated into the Final Short Form EA where appropriate.

The Public Meeting was an informal, walk-through event where individuals had the opportunity to review maps and displays, ask questions, give feedback, and discuss the project with Airport staff and consultant team members. Attendees could arrive at any time and choose to visit each station or select specific areas of interest. A printed open house guide was provided to inform guests of the station topics. According to the Public Meeting sign-in sheets, approximately 23 people attended the Public Meeting. Copies of the legal public notice and sign-in sheets are found at the end of this document.

The legal public notice was advertised in two local newspapers 31 days and 27 days before the Public Meeting. The public notices explained that the Draft Short Form EA was available for public review and announced the date, time, and location of the Public Meeting.

Physical copies of the Draft Short Form EA document were made available for public review at the Airport during normal business hours and an electronic copy was also available on the Airport's website.

## **2. Summary of Public Comments Received and Airport Responses**

No public comments were received.

## **3. Summary of Agency Comments Received and Airport Responses**

Correspondence from three agencies was received on the 2024 Draft Short Form EA. A summary of their comments and Airport responses are included below. Agency comments have been incorporated into the Final Short Form EA where appropriate. Actual correspondence letters received are provided later in this appendix.

### **United State Environmental Protection Agency**

#### ***PURPOSE AND NEED / PROJECT ALTERNATIVES***

*The Draft EA explains that both ends of Runway 8/26 have displaced landing thresholds due to the presence of tree obstructions. Key features of the proposed Project include both shortening the runway (from both ends) to 2,300 feet and removing tree obstructions.*

#### ***Recommendations for the Final EA:***

- Runway Requirements (Appendix B) indicates a runway length of 2,400 feet would adequately accommodate the majority of aircraft based and operating at the Airport on a regular basis. Explain why the proposed runway length is only 2,300 feet and not 2,400 feet.*

**Response:** A runway length of 2,300 feet (vs. 2,400 feet) was selected as the Preferred Alternative as 2,300 feet would still meet the needs of aircraft that operate at the Airport but would require less trees to be removed resulting in less private property and environmental impacts.

- *Clarify that proposed cutting and grubbing of trees in order to clear obstructions from the approach surface, runway protection zones (RPZs) and runway safety areas (RSAs) is due to a lack of regular maintenance.*

**Response:** The need to remove trees was the result of a combination of factors including funding availability, expected environmental impacts and mitigation requirements, and private property impacts. The primary reason was the lack of land use controls in the runway approaches. The Airport did not have the authority or the right to remove trees on private property in the past nor was the funding to purchase required easements available. The project just recently received state funding to address obstructions in the runway approaches.

- *Explain how the proposed runway length of 2,300 feet will impact the approach surfaces, RPZs and RSAs. An exhibit showing the existing runway, approach surfaces, RPZs, and RSAs, as well as the proposed runway length and corresponding approach surfaces, RPZs and RSAs, should be included in the Final EA.*

**Response:** A reduced runway length will improve and reduce private property impacts in the approaches and require less tree removals. As the runway shortens, all safety areas and approach surfaces move closer to the Airport. **Figure 1.6 Alternatives Considered** found on page 19, illustrates the Runway Protection Zone, Runway Safety Area and the various approach surfaces surrounding the Airport.

- *Explain the management approach to identifying and addressing future obstructions. Create a management plan to avoid future vegetative obstructions that could impact Airport operations.*

**Response:** As explained in the Short Form EA, once the trees have been removed, the Airport plans to maintain obstructions on Airport property using existing tractor and mowing equipment.

Avigation easements will be purchased over private property regulating the height of trees allowed. Off airport trees will be initially removed at the Airport's expense; however, if property owners allow trees to become obstructions in the future, the owners will be responsible for removing those trees at that time.

## **AQUATIC IMPACTS**

### **Wetlands**

*The Draft EA indicates 1.039 acres of forested wetlands and 3.544 acres of non-forested wetlands will be impacted by this project.*

#### **Recommendations for the Final EA:**

- *Discuss required wetland mitigation ratios for the proposed wetland impacts. Provide additional information on the mitigation required by the Michigan Department of Environment, Great Lakes, and Energy for the 3.544 acres of impact to non-forested wetlands and 1.039 acre of forested wetlands that would be cleared, grubbed, filled or graded, including the location of required mitigation.*

**Response:** As discussed in the Short Form EA, consultation with EGLE indicates that cutting trees in any forested wetland (1.039 acres) is considered an impact to that wetland even if there is no ground disturbance. Wetlands along the south side of the runway (total of 3.544 acres) are non-forested wetlands and would be cleared, grubbed, filled, and graded to accommodate the RSA and ROFA for the reconstructed runway.

Proposed mitigation for wetland impacts is expected to include an EGLE Part 303 Wetland Protection permit and mitigation of 1.039 acres for the forested wetlands (1:1 ratio) and 5.316 acres for the non-forested wetlands (1:1.5 ratio) for a total of 6.355 acres. Mitigation would include the purchase of wetland credits at an EGLE approved mitigation bank within the same watershed.

### **Stormwater Runoff**

*The Airport property covers approximately 79 acres within the Novi Lyons Drain-Davis Creek Watershed of the Huron River Watershed. Surrounding land uses primarily include single-family residential to the north and lower density residential, as well as vacant land, to the west and south. The New Hudson No. 1 Drain, a steep-sided constructed drain approximately 25 feet wide, parallels Runway 8/26 on the northern side and flows to the west.*

#### **Recommendations for the Final EA:**

- *Explain how the proposed actions (e.g., tree obstruction removal, runway widening) will impact stormwater runoff and filtration.*

**Response:** The Preferred Alternative will reduce impervious surface areas and likely decrease stormwater runoff due to the proposed removal of runway and taxiway pavement. Estimates indicate a net decrease in impervious surfaces of 1.10 acres (48,200 square feet). However, soil erosion is a source of concern due to potential impacts to surface waters from runway reconstruction and tree removals. Since the Airport site is generally flat, a high risk of soil erosion during excavation and ground disturbing activities is not expected. However, some

amount of erosion may occur. The following list of BMPs represents common erosion control measures that should be considered during construction and obstruction removal and applied where applicable:

- Sediment traps
- Temporary cement ponds
- Temporary grassing of disturbed areas
- Vegetation cover replaced as soon as possible
- Erosion mats and mulch
- Silt fencing and drainage check dams
- Settling basins for stormwater treatment

All excavated soils and staging areas for construction equipment will be placed in non-sensitive upland areas with all disturbed areas replanted as soon as possible to reduce the likelihood of erosion.

Mitigation measures prepared under an erosion control plan, in accordance with FAA AC 150/5370-10H, *Standard Specifications for Construction of Airports*, will help minimize long-term impacts to area water quality and to the existing drainage system.

Part 91, Michigan Soil Erosion and Sedimentation Control of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended, requires the Airport to acquire a soil erosion and sedimentation control permit from the Oakland County Water Resources Commissioner's Office.

The Airport is also required to obtain a National Pollutant Discharge Elimination System (NPDES) permit from EGLE for construction activity disturbing one acre or more of soil. Permittees are required to control runoff from construction sites and develop a construction Stormwater Pollution Prevention Plan (SWPPP) that includes erosion prevention and sediment control BMPs.

## **BIOLOGICAL RESOURCES**

*The Draft EA describes potential impacts to listed species as well as best management practices (BMPs) proposed to reduce disturbance to state and Federally-listed threatened and endangered species.*

### **Recommendations for the Final EA:**

- *Clarify whether contractors will be required to follow BMPs listed in the Draft EA and appendices when completing the proposed project. Include these commitments in the forthcoming Finding of No Significant Impact (FONSI) and project contract documents.*

**Response:** Although the Airport will strongly encourage contractors to implement any agency BMPs, the Airport/contractors must follow applicable FAA advisory circulars and construction guidance. Construction contracts will identify any applicable FAA requirements that contractors must follow. The FONSI will also include this requirement.

- *Create an exhibit similar to the exhibit entitled Bat Habitat Assessment Areas (Appendix H) in order to show the habitats of listed species compared to the proposed project area. This exhibit should be included in the body of the EA, as it was difficult to find in the appendices.*

**Response:** In order to keep page limits in the Short Form EA to a minimum, text was added to direct readers to the exact location of the bat habitat maps found in Appendix H – Biological Resources.

### **CONSTRUCTION**

*We acknowledge the inclusion of BMPs that would reduce emissions from construction. We encourage FAA to require contractors to utilize these BMPs to the extent practicable in addition to FAA's advisory circulars and construction guidelines.*

**Response:** Although the Airport will strongly encourage the use of the USEPA emissions checklist and other BMPs, the Airport must follow applicable FAA advisory circulars during construction. Construction contracts will identify any applicable requirements that contractors must follow.

### **TREE REPLACEMENT**

*Obstructions that penetrate the FAR Part 77 approach surfaces of Runway 8/26 need to be removed as part of the proposed project.*

#### **Recommendations for the Final EA:**

- *In addition to clarifying whether trees will be removed from 35.9 acres due to a lack of regular maintenance of the approach surfaces, RPZs and RSAs, provide additional information on the Airport's proposed plan to maintain approach surfaces, RPZs, and RSAs in the future. Specify the approximate number of trees that need to be removed.*

**Response:** As explained above, once the trees have been removed, the Airport plans to maintain obstructions on Airport property using existing tractor and mowing equipment. Off airport trees will be initially removed at the Airport's expense. However, easements will be purchased over private property regulating the height of trees. If property owners allow trees to become obstructions in the future, the owners will be responsible for removing those trees at their expense.

It is virtually impossible to quantify the exact number of trees that will be cleared under the Preferred Alternative as the project area includes many saplings to large mature trees.

- *Commit to mitigation for tree loss at a 1:1 ratio. Include a cost estimate for tree mitigation in the Final EA. Working with local nurseries or the Michigan Department of Natural Resources (MDNR) and/or local park districts could serve as useful resources when creating an estimate and to provide suitable locations for tree mitigation.*

**Response:** A 1:1 tree mitigation ratio will be considered by the Airport but is not guaranteed. Costs of tree replacements are difficult to determine until the easement acquisition phase is complete. Many of the trees proposed for removal are on private property and owners have the right to refuse replacement trees. In many cases property owners prefer not to have replacement trees as they become nuisances and are difficult to maintain. Tree replacement costs will be determined and included the easement acquisition phase.

#### **Section 4(f) Property**

*The proposed project includes the removal and replacement of trees within the right-of-way (ROW) of the Huron Valley Trail, which is a Section 4(f) property. The Draft EA describes how a memorandum of agreement (MOA) between Oakland County and the Michigan DNR stipulates that any trees within the Huron Valley ROW will be replaced at a 1:1 ratio. The Western Oakland County Trailway Management Council will specify the location and species for replacement.*

#### **Recommendations for the Final EA:**

- *EPA requests that only native tree species suitable to this eco-region are used for tree mitigation.*

**Response:** Native trees will be considered, but the selection is at the discretion of the Western Oakland County Trailway Management Council. All trees used as replacements will be a species suitable to the project's eco-region and will be low growing varieties as to not become obstructions in the future. If trees are selected with the potential to become obstructions in the future, they will be planted outside of the runway approaches.

#### **Oakland County Planning and Local Business Development Division, Economic Development Department**

*I'm writing in response to your attached letter dated March 27, 2024, and the digital files that you had provided on thumb drive. We have reviewed the Draft Short Form Environmental Assessment and find no significant impacts.*

**Response:** Comment noted.

**Department of Natural Resources**

*The draft EA for the proposed airport improvements at Oakland Southwest Airport was forwarded to DNR staff for review. Wildlife Biologist Kaitlyn Barnes has provided that she has reviewed the Biological Resources section of the EA and is satisfied/has no comment.*

**Response:** Comment noted.





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BE IT MADE KNOWN THAT THE FOLLOWING ADVERTISEMENT APPEARED IN:

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Placed By: Mead & Hunt Inc.  
Subject: Notice of Availability – Oakland Southwest Airport  
Publication Date: April 4, 2024

Susan Totoraitis (Susan Totoraitis), being duly sworn, deposes  
and says that the advertising illustrated above/attached was published in the  
S. Lyon Herald Newspaper on the following date/s/: April 4, 2024,  
INVOICE #8792383, and as an authorized employee of the Observer and  
Eccentric Media, she knows well the facts stated/herein. Cost: \$300.90.

STATE OF MICHIGAN

NOTARIZED BY: Livia Huff

DATED: April 9, 2024

Acting in County of Macomb

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County of Livingston  
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Acting in the County of \_\_\_\_\_

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**MEAD & HUNT**  
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**LANSING, MI 48906**  
Attention: William Ballard

**STATE OF MICHIGAN,  
COUNTY OF OAKLAND**

The undersigned Cyndy Slater Cyndy Slater, being duly sworn the he/she is the principal clerk of Oakland Press, theoaklandpress.com, theoaklandpress.com2, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

**MEAD & HUNT**

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VICKI ARSENAULT  
NOTARY PUBLIC - STATE OF MICHIGAN  
COUNTY OF OAKLAND  
My Commission Expires May 11, 2026  
Acting in the County of \_\_\_\_\_

Sworn to the subscribed before me this 3 April, 2024

Vicki Arsenault  
Notary Public, State of Michigan  
Acting in Oakland County

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**NOTICE OF AVAILABILITY  
OF A  
DRAFT SHORT FORM ENVIRONMENTAL  
ASSESSMENT  
AND  
NOTICE OF A PUBLIC MEETING  
FOR  
PROPOSED AIRPORT IMPROVEMENTS  
AT THE  
OAKLAND SOUTHWEST AIRPORT  
NEW HUDSON, MICHIGAN**

ALL INTERESTED PERSONS are notified of the availability of a Draft Short Form Environmental Assessment (EA) evaluating the potential effects of proposed improvements at the Oakland Southwest Airport (Airport) in compliance with applicable laws, regulations, Executive Orders, and FAA policies including Order 1050.1F. A hardcopy of the Draft Short Form EA is available for review during normal business hours at the below locations or an electronic version is available anytime online on the Oakland County's website until **May 3, 2024**. Documents can be found at the following locations:

- A hardcopy is available at the following locations:
  - o Oakland Southwest Airport located at 57751 Pontiac Trail Building #2, New Hudson, MI 48165
  - o Oakland County International Airport located at 6500 Patterson Parkway, Waterford, MI 48327 in the Administrative Office
- An electronic version is available online at:  
<https://www.oakgov.com/community/airports>

ALL INTERESTED PERSONS are further advised of a public meeting being held by the Airport. The purpose of the public meeting will be to consider the social, economic, and environmental effects of proposed improvements and whether the improvements are in the public interest and consistent with the National Environmental Policy Act of 1969. The public meeting is scheduled for:

**May 1, 2024, from 5:30 PM to 7:00 PM at the Salem-South Lyon District Library, located at 9500 Pontiac Trail, South Lyon, MI 48178**

The public meeting will focus on the Draft Short Form EA for the following proposed improvements:

- Remove 220 feet of existing pavement from the Runway 8 end and 608 feet from the Runway 26 end, resulting in both a shifting of runway thresholds and an overall reduction in runway length from 3,128 feet to a new length of 2,300 feet.
- Widen Runway 8/26 to the standard width of 80 feet (existing width is 40 feet).
- Remove the existing full-length parallel taxiway and replace with a taxiway turnaround at the Runway 8 end and a bypass taxiway at the Runway 26 end.
- Construct a taxiway connector between an executive hangar and Runway 8/26.
- Obtain aviation easements to remove trees that are obstructions to the approach surfaces of Runways 8/26.
- Clear and grade tree obstructions which penetrate approach surfaces of Runways 8/26.
- Clear and grade the area between the Runway Safety Area and the Runway Object Free Area on the south side of the runway to create a surface that the Airport can easily maintain.

The public meeting will be an open house format with no formal presentation given. Members from the project team will be available to answer questions on an individual basis. Interested participants may attend the meeting anytime between the listed hours. Comment forms will be available for those persons who would like to make a statement regarding the project, and have it included in the official transcript of the public meeting. Before including personal identifying information in your comment, be advised that your entire comment including your personal information, may be made publicly available at any time.

In compliance with the Americans with Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) during the meeting should notify Cheryl Bush, Manager of Aviation, at least three days prior to the meeting.

The public is also encouraged to submit written comments or concerns by mail or email. Comments must be received by **May 3, 2024**, to be included in the official project record. Send comments to:

Cheryl Bush, Manager of Aviation  
Oakland County International Airport  
6500 Patterson Pkwy.  
Waterford, MI 48327  
248-666-3900 / [busbc@oakgov.com](mailto:busbc@oakgov.com)



Oakland Southwest Airport  
Environmental Assessment Public Meeting  
May 1, 2024  
Sign-in Sheet

Name	Address	E-mail	Phone Number
Dave Huck	12801 Heaven Dr.	david.huck@chuckey.net	248-459-9257
Jason + Robin Bryant	59041 Annah Dr	Robinb0322@gmail.com	734.637.4285
Roger Gehle	11561 Livalori, Southlyp.	rogeraes@gmail	2485755947
MARK FOSTER	497 LYON BLVD SOUTHLYON	MARK.FOSTER7744@GMAIL.COM	248-981-3536
Nick McMahon	8039 N Ridge Road, Canton, MI 48187	Nick@Mhshetl.com	(313) 949-0004
JAMES WISTI	28920 VINTAGE DR. N.H.	wistjames@YAHOO.COM	248 672 0821
DAVID EAKLON	59398 TRAVIS RD.	LYWNETA@YAHOO.COM	248-504-9178
Kristofor Enlow	61680 Topsfield Ln.	kenlow@lyontwp.org	248-345-1771
JAMES FARLINGTON	1931 WEST LAKE DR, <sup>NOVI</sup> 48377	JFARLINGTON@CHAMPIONGASKET	248-8902375
PAT CLANCY	" "	patclancys@mi.rr.com	248-345-8228
Lynn Prohaska	2645 9 mile St 48178	LPRO5280@yahoo.com	313-349-6646
Bob Prohaska	" "	RPRO3457@gmail.com	248-505-2020



Oakland Southwest Airport  
Environmental Assessment Public Meeting  
May 1, 2024  
Sign-in Sheet

Name	Address	E-mail	Phone Number
Kim Rienstra	210 Eagle Crest Dr South Lyon	MISSQ22@msn.com	734-684157
Andy Rienstra	" " " "	" "	" "
JUSTIN FENNER	25256 STANLEY LN S LYON	FENNERJJA@GMAIL.COM	248-520-6570
MIKE LAFOREST	9814 GRANDIN LANE MI 48179	MGLAFOREST@ICLOUD.COM	734 6357007
ERIK WEIR	921 W DAWSON MILFORD	EWEIFR47@GMAIL.COM	248 730 1526
Ryan Rimmer	1131 Equestrian Dr	rimmerre@gmail.com	248-778-7932
Caroline Salzman	365 N. Hagadorn St <sup>Suite</sup>	csalzman315@gmail.com	946 444-6236
Jill Buterbaugh	9931 Beck Ct	jbuterbaugh@oakca.com	7377-8310



Draft EA Agency Distribution List

Salutation line	Contact Name	Title	Organization	Address	City, State, Zip	Phone or Email
<b>Federal and State Coordination - Master List</b>						
Mr. Duffiney	Tony Duffiney	State Director	USDA - APHIS Wildlife Services	2803 Jolly Rd., Suite 100,	Okemos, MI 48864	517-336-1928
Mr. Watling	Jim Watling	Supervisor	EGLE, Water Resources Division, Transportation Review Unit	P.O. Box 30458	Lansing, MI 48909-7958	517-599-9002
Mr. Dugan	Moises Dugan	Regional Administrator (Acting)	Federal Emergency Management Agency, Region 5	536 South Clark Street, 6th Floor	Chicago, Illinois 60605	312-408-5500
Ms. Gagliardo	Jean Gagliardo	District Conservationist	USDA, Natural Resource Conservation Service, Portage Service Center	5950 PORTAGE RD	PORTAGE, MI 49002	269-382-5121 ext 3
Mr. Hicks	Scott Hicks	Field Office Supervisor	US Fish and Wildlife - Michigan Field Office	2651 Coolidge Road, Suite 101	East Lansing, Michigan 48823	517-351-6274
Mr. Westlake	Kenneth Westlake	Chief	EPA Region 5 , NEPA Implementation Section	77 West Jackson Boulevard	Chicago, Illinois 60604	312-886-2910
Ms. Lott	Shannon Lott	Natural Resources Deputy	Michigan Department of Natural Resources, Executive Division	P.O. Box 30028	Lansing, MI 48909	517-243-3166/517-284-5810
<b>Local &amp; Political Coordination - Master List</b>						
Ms. Des Rochers	Katherine Des Rochers	Planning Department Coordinator	Lyon Township	58000 Grand River Avenue	New Hudson, MI 48165	248-956-1679
Mr. Nash	Jim Nash	Commissioner	Oakland County Water Resources Commissioner's Office	One Public Works Drive, Building 95W	Waterford, MI 48328	248-858-0958
Mr. Rasegan	Bret Rasegan, RA	Planning Manager	Oakland County Planning Division	2100 Pontiac Lake Road, Building 41 West	Waterford, MI 48328	248-858-5445



## REGION 5

CHICAGO, IL 60604

May 2, 2024

### **VIA ELECTRONIC MAIL ONLY**

Misty Peavler  
Federal Aviation Administration  
Detroit Airports District Office  
11677 S Wayne Road  
Romulus, Michigan 48174

Steve Houtteman  
Michigan Department of Transportation  
Bureau of Aeronautics  
2700 Port Lansing Road  
Lansing, Michigan 48906

**Re: EPA Comments: Draft Short Environmental Assessment Form for Runway 8/26 Shift, Shortening, and Approach Clearing at Oakland/Southwest Airport in Oakland County, Michigan**

Dear Ms. Peavler and Mr. Houtteman:

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Federal Aviation Administration's (FAA) undated Draft Short Environmental Assessment Form (Draft EA), regarding the above-mentioned project, which proposes modifications to Runway 8/26 (hereafter: Project) at the Oakland/Southwest Airport (Airport). Oakland County, Michigan owns and operates the Airport and is the non-Federal partner. This letter provides EPA's comments on the proposed Project pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Airport serves the southwest Oakland County region and is categorized by FAA as a reliever airport for Detroit Metro Wayne County Airport. Currently, the primary runway (Runway 8/26) is 3,128 feet long and 40 feet wide, with displaced landing thresholds at both ends. Displacements are due to the presence of tree obstructions at both approach ends of Runway 8/26.

An examination of existing Airport operations determined the current Runway Designation Code (RDC) is A-I Small. This category requires a runway length of 2,400 feet and a width of 60 feet. The proposed project is to reconstruct Runway 8/26 to a shorter length than the existing runway and to address overdue maintenance concerns both at the Airport and on properties adjacent to the Airport.

The Draft EA analyzed three alternatives:

- The No Build Alternative;
- Alternative 1 – Reconstruct Runway 8/26 to 2,300 feet by 60 feet; clear/grub current and future obstructions in upland areas; and clear/cut current and future obstructions with no ground disturbance in wetland areas (Preferred Alternative); and
- Alternative 2 – Reconstruct Runway 8/26 to 2,300 feet by 60 feet; clear/grub current and future obstructions in both upland and wetland areas.



The preferred alternative is Alternative 1. Key components include:

- Remove 220 feet of existing pavement from the end of Runway 8 and 608 feet of pavement from the end of Runway 26, resulting in both new runway thresholds and an overall reduction in runway length from 3,128 feet to a new shortened length of 2,300 feet;
- Widen Runway 8/26 from 40 feet to the standard width of 60 feet;
- Remove the existing full-length parallel taxiway<sup>1</sup>, replacing it with a taxiway turnaround at the end of Runway 8 and a bypass taxiway at the end of Runway 26 to facilitate 180-degree turns;
- Construct a taxiway connector between an executive hangar and Runway 8/26 to replace the existing taxiway connector that will be lost due to the removal of the parallel taxiway;
- Obtain aviation easements to remove trees that are obstructions to FAA Part 77 approach surfaces and state of Michigan design standards for Runway 8/26;
- Clear and grub tree obstructions in upland areas (with tree and obstruction removal in wetland areas without ground disturbance) which penetrate the FAA Part 77 approach surfaces and state of Michigan design standards for Runway 8/26;
- Clear and grade the area between the Runway Safety Area and the Runway Object Free Area on the south side of the runway to create a surface that the Airport can easily maintain.

EPA's detailed comments on Draft EA are enclosed with this letter and focus on purpose and need/project alternatives, aquatic impacts, biological resources, construction, and tree replacement. We recommend that FAA address EPA's comments before finalizing the EA.

Thank you for the opportunity to review the Draft EA. Please send an electronic copy of future NEPA documents to [R5NEPA@epa.gov](mailto:R5NEPA@epa.gov). If you would like to discuss the contents of this letter further, please contact Kathy Kowal, lead reviewer for this project, at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov). Ms. Kowal is also available at 312-353-5206.

Sincerely,

Krystle Z. McClain, P.E.  
NEPA Program Supervisor  
Environmental Justice, Community Health, and  
Environmental Review Division

Enclosures:

EPA's Detailed Comments

CC (with enclosures):

Stan Reinke, MDOT-AERO ([reinkes1@michigan.gov](mailto:reinkes1@michigan.gov))

Paige Luft, MDOT-AERO ([luftp3@michigan.gov](mailto:luftp3@michigan.gov))

Ron Olson, MDNR ([OlsonR@michigan.gov](mailto:OlsonR@michigan.gov))

Paige Cavanaugh, Michigan EGLE ([CavanaughP1@michigan.gov](mailto:CavanaughP1@michigan.gov))

Bill Ballard, Mead & Hunt ([william.ballard@meadhunt.com](mailto:william.ballard@meadhunt.com))

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<sup>1</sup> The existing full-length parallel taxiway is not required based on current and projected activity levels.

## EPA's Detailed Comments

### Draft Short Environmental Assessment Form for Runway 8/26 Shift, Shortening, and Approach Clearing at Oakland/Southwest Airport Oakland County, Michigan May 2, 2024

#### **PURPOSE AND NEED / PROJECT ALTERNATIVES**

- The Draft EA explains that both ends of Runway 8/26 have displaced landing thresholds due to the presence of tree obstructions. Key features of the proposed Project include both shortening the runway (from both ends) to 2,300 feet and removing tree obstructions.

#### **Recommendations for the Final EA:**

- *Runway Requirements* (Appendix B) indicates a runway length of 2,400 feet would adequately accommodate the majority of aircraft based and operating at the Airport on a regular basis. Explain why the proposed runway length is only 2,300 feet and not 2,400 feet.
- Clarify that proposed cutting and grubbing of trees in order to clear obstructions from the approach surface, runway protection zones (RPZs) and runway safety areas (RSAs) is due to a lack of regular maintenance.
- Explain how the proposed runway length of 2,300 feet will impact the approach surfaces, RPZs and RSAs. An exhibit showing the existing runway, approach surfaces, RPZs, and RSAs, as well as the proposed runway length and corresponding approach surfaces, RPZs and RSAs, should be included in the Final EA.
- Explain the management approach to identifying and addressing future obstructions. Create a management plan to avoid future vegetative obstructions that could impact Airport operations.

#### **AQUATIC IMPACTS**

##### Wetlands

- The Draft EA indicates 1.039 acres of forested wetlands and 3.544 acres of non-forested wetlands will be impacted by this project.

**Recommendations for the Final EA:** Discuss required wetland mitigation ratios for the proposed wetland impacts. Provide additional information on the mitigation required by the Michigan Department of Environment, Great Lakes, and Energy for the 3.544 acres of impact to non-forested wetlands and 1.039 acre of forested wetlands that would be cleared, grubbed, filled or graded, including the location of required mitigation.

##### Stormwater Runoff

- The Airport property covers approximately 79 acres within the Novi Lyons Drain-Davis Creek Watershed of the Huron River Watershed. Surrounding land uses primarily include single-family residential to the north and lower density residential, as well as vacant land, to the west and south. The New Hudson No. 1 Drain, a steep-sided constructed drain approximately 25 feet wide, parallels Runway 8/26 on the northern side and flows to the west.

**Recommendations for the Final EA:** Explain how the proposed actions (e.g., tree obstruction removal, runway widening) will impact stormwater runoff and filtration.

## **BIOLOGICAL RESOURCES**

- The Draft EA describes potential impacts to listed species as well as best management practices (BMPs) proposed to reduce disturbance to state and Federally-listed threatened and endangered species.

### **Recommendations for the Final EA:**

- Clarify whether contractors will be required to follow BMPs listed in the Draft EA and appendices when completing the proposed project. Include these commitments in the forthcoming Finding of No Significant Impact (FONSI) and project contract documents.
- Create an exhibit similar to the exhibit entitled *Bat Habitat Assessment Areas* (Appendix H) in order to show the habitats of listed species compared to the proposed project area. This exhibit should be included in the body of the EA, as it was difficult to find in the appendices.

## **CONSTRUCTION**

- We acknowledge the inclusion of BMPs that would reduce emissions from construction. We encourage FAA to require contractors to utilize these BMPs to the extent practicable in addition to FAA's advisory circulars and construction guidelines.

## **TREE REPLACEMENT**

### *Obstruction Removal*

- Obstructions that penetrate the FAR Part 77 approach surfaces of Runway 8/26 need to be removed as part of the proposed project.

### **Recommendations for the Final EA:**

- In addition to clarifying whether trees will be removed from 35.9 acres due to a lack of regular maintenance of the approach surfaces, RPZs and RSAs, provide additional information on the Airport's proposed plan to maintain approach surfaces, RPZs, and RSAs in the future. Specify the approximate number of trees that need to be removed.
- Commit to mitigation for tree loss at a 1:1 ratio. Include a cost estimate for tree mitigation in the Final EA. Working with local nurseries or the Michigan Department of Natural Resources (MDNR) and/or local park districts could serve as useful resources when creating an estimate and to provide suitable locations for tree mitigation.

### *Section 4(f) Property*

- The proposed project includes the removal and replacement of trees within the right-of-way (ROW) of the Huron Valley Trail, which is a Section 4(f) property. The Draft EA describes how a memorandum of agreement (MOA) between Oakland County and the Michigan DNR stipulates that

any trees within the Huron Valley ROW will be replaced at a 1:1 ratio. The Western Oakland County Trailway Management Council will specify the location and species for replacement.

**Recommendations for the Final EA:**

- EPA requests that only native tree species suitable to this eco-region<sup>2</sup> are used for tree mitigation.

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<sup>2</sup> [https://www.fs.usda.gov/psw/publications/documents/psw\\_gtr199/psw\\_gtr199.pdf](https://www.fs.usda.gov/psw/publications/documents/psw_gtr199/psw_gtr199.pdf)

**From:** [Courtney Beard](#)  
**To:** [Courtney Beard](#)  
**Subject:** FW: Draft Short Form EA for proposed airport Improvements Oakland Southwest Airport  
**Date:** Friday, May 3, 2024 1:26:09 PM  
**Attachments:** [MeadHuntlogo\\_87950253-989c-49b2-a74f-a156c21c38dd.png](#)

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## Courtney Beard

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Mr. Ballard,

I'm writing in response to your attached letter dated March 27, 2024 and the digital files that you had provided on thumb drive.

We have reviewed the Draft Short Form Environmental Assessment and find no significant impacts.

Please let me know if you require further information.

Thank you, Bret

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**Bret Rasegan, R.A.**  
**Manager**

Planning and Local Business Development Division  
Economic Development Department  
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***All ways, moving forward***

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Hello Mr. Ballard,

The draft EA for the proposed airport improvements at Oakland Southwest Airport was forwarded to DNR staff for review. Wildlife Biologist Kaitlyn Barnes has provided that she has reviewed the Biological Resources section of the EA and is satisfied/has no comment.

Thank you,



**Lindsay Hiller**

Administrative Assistant

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Department of Natural Resources

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