



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Department of Transportation  
Federal Aviation Administration  
Orlando Airports District Office  
Orlando, Florida

## **FINDING OF NO SIGNIFICANT IMPACT AND RECORD OF DECISION**

**Environmental Assessment for  
Taxiway Extension, Apron Expansion, and Security  
Fencing Improvements at the  
Key West International Airport**

Key West, Florida

March 19, 2021

**BACKGROUND:** The Key West International Airport (EYW) is owned and operated by Monroe County (also referred to in this document as the “County” or “Airport Sponsor”). The airport is a public-use, non-hub primary airport that accommodates scheduled passenger service, air charter, air taxi, air cargo, and general aviation activities. Located approximately 160 miles southwest of Miami via State Road A1A, the airport supports local tourism and businesses and is a critical component of the local transportation network.

The County is proposing to make taxiway, aircraft parking apron, and airfield perimeter fence improvements to enhance operational efficiency and safety at the airport. The proposed improvements include extending Taxiway A to the end of Runway 9-27, expanding the commercial and general aviation aircraft parking aprons, and relocating and improving a section of the airfield security fence. Because the proposed improvements require federal actions by the Federal Aviation Administration<sup>1</sup>, an Environmental Assessment (EA) was prepared by the County for the FAA’s use in complying with the requirements of the *National Environmental Policy Act of 1969* (NEPA), Council on Environmental Quality (CEQ) regulations implementing NEPA<sup>2</sup>, FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*.

This Finding of No Significant Impact (FONSI) and Record of Decision (ROD) provides the FAA’s environmental determination, approval, and conditions for agency actions necessary to implement the Proposed Action. This FONSI/ROD is based on information and analyses contained in the attached *Environmental Assessment for Runway and Taxiway Separation Improvements*, which is incorporated by reference, and other related documents available to the agency. The ROD is issued in accordance with CEQ regulations at 40 CFR §1505.2.

**PROPOSED PROJECT:** Based on the needs described in the EA, the Airport Sponsor has proposed the following airfield development projects at EYW:

- Extend parallel Taxiway A approximately 274 feet to connect with and provide direct access to the west end of Runway 9-27. This project would also reconfigure and remove excess pavement at connector Taxiway B, the current west terminus of Taxiway A.

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<sup>1</sup> Section 163 of the *FAA Reauthorization Act of 2018* limits the FAA’s statutory authority over certain airport development projects. In this case, FAA reviewed the proposed airfield development projects and determined that each project element is subject to FAA’s decision and approval authority, including approval of the Airport Layout Plan under 49 U.S.C. § 47107(a)(16).

<sup>2</sup> The Council on Environmental Quality (CEQ) amended its regulations implementing NEPA effective September 14, 2020. Agencies have discretion to apply the amended regulations to NEPA processes that were begun before September 14, 2020 (40 CFR § 1506.13 (2020)). FAA initiated its NEPA process for this action in September 2019 and has decided to apply the regulations in effect at that time.

- Expand the commercial aircraft parking apron at the passenger terminal and reconfigure the parking layout plan so that all taxilanes and commercial aircraft parking positions meet FAA design standards for Airport Design Group III aircraft. The proposed project would expand the existing apron to the east and provide approximately 13,200 square yards of additional apron pavement.
- Expand the general aviation (GA) aircraft parking apron located west of connector Taxiway C to provide additional parking spaces at EYW during peak periods. Construction would expand the existing apron by approximately 5,400 square yards. This project also includes relocating a section of the airport's vehicle service road out of the Taxiway A Object Free Area.
- Relocate a 1,500-foot section of non-standard airfield perimeter security fence out of the Runway 9-27 Object Free Area. The project would install approximately 2,700 feet of new fence along a section of the airport's north boundary line. Approximately 860 feet of the new fence would be a floating barrier installed across an area of open water (salt pond).

#### **REQUESTED FEDERAL ACTION:**

The requested federal actions associated with the proposed development projects include the following:

1. Unconditional approval of the portions of the EYW Airport Layout Plan (ALP) depicting the Proposed Action and its individual elements, pursuant to 49 U.S.C. §§ 40103(b), 44718, and 47107(a)(16); 14 CFR Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace; and 14 CFR Part 157, Notice of Construction, Alteration, Activation, and Deactivation; and 14 CFR Part 139.
2. Determinations under 49 U.S.C. §§ 47106 and 47107 relating to the eligibility of the Proposed Action for federal funding under the Airport Improvement Program (AIP) and under 49 U.S.C. § 40117, as implemented by 14 CFR 158.25, to impose and use passenger facility charges (PFCs) collected at the Airport for the Proposed Action to assist with construction of potentially eligible development items shown on the ALP.
3. Determination of eligibility for federal assistance and further processing of applications for federal assistance for the eligible components of the Proposed Action under the federal grant-in-aid program authorized by the Airport and Airway Improvement Act of 1982, as amended (49 U.S.C. § 47101, et. seq.).

**PURPOSE AND NEED:** The purpose of and need for each major component of the Proposed Action is described below and discussed in more detail in Section 1.4 of the EA.

**Extend Parallel Taxiway A to Runway 9 End** – Runway 9-25, the airport's only runway, operates in east-flow conditions nearly 90 percent of the time due to prevailing winds. For east-flow departures, aircraft use connector Taxiway B to access the runway; however,

Taxiway B does not connect directly to the end of the runway (Runway 9). Departing aircraft that need the full length of the runway must taxi onto the runway, back-taxi approximately to the end of the runway, then turn around on the runway for departure. This requires additional communications from the Airport Traffic Control Tower, results in aircraft taxiing on the runway opposite to the flow of traffic, and introduces inefficiencies and delay. For larger aircraft, back-taxiing to the end of the runway and turning around often does not allow the full use of available runway pavement. The proposed extension of parallel Taxiway A to the western end of the runway (Runway 9) would make the entire length of the runway available for departures, without the need to back-taxi on the runway. Eliminating back-taxi operations on Runway 9-27 would improve the efficiency of aircraft operations at EYW, enhance safety at EYW, and allow full use of the available runway length.

**Expand Commercial Aircraft Parking Apron to the East** – The current aircraft parking apron layout plan at the passenger terminal building was designed to accommodate four narrow-body commercial aircraft (ADG III), five regional commercial aircraft (ADG II), and one parking position at the U.S. Customs and Border Protection (CBP) facility. In addition to the commercial aircraft and CBP parking positions, the southeast area of the apron is also used by air cargo aircraft, unanticipated commercial aircraft parking, and periodic overflow general aviation aircraft parking. At EYW, commercial passengers are escorted onto the apron and walk to their parked aircraft for boarding.

Due to limited space and the layout of the apron, the increasing number of commercial aircraft operations during peak periods and the increasing use of ADG III aircraft at EYW results in regular congestion on the commercial apron and Taxiway A. Because all of the apron's taxilanes and parking positions do not meet ADG III design standards, aircraft moving to and from parking positions are dependent on whether adjacent positions are occupied and, when occupied, require the use of wing walkers to confirm the area around the wing tips is clear of any hazards. When several commercial aircraft land consecutively, aircraft traffic routinely must hold on Taxiway A and wait to access a parking position. It is common for all nine commercial aircraft positions to be occupied during peak periods. Other factors that contribute to congestion on the apron include airline schedule delays (i.e., weather) or the need to also park general aviation aircraft on the east edge of the apron during peak tourism periods and special events.

There is a need to improve access to and from aircraft parking positions on the commercial apron to improve efficiency of ramp operations, and enhance safety.<sup>3</sup> Expanding the commercial apron would provide the space necessary to reconfigure the taxilanes and commercial aircraft parking spaces to meet ADG III design standards. The proposed project would reduce congestion, improve efficiency of ramp operations, and enhance safety.

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<sup>3</sup> FAA design criteria in FAA Advisory Circular 150/5300-13A, *Airport Design*, notes that the primary design consideration for apron layout is “to provide adequate wingtip clearances for the aircraft positions and the associated taxilanes.”

**Expand GA Aircraft Parking to the West** – General aviation aircraft parking at EYW is limited. The main GA apron, which is located adjacent to the commercial apron, can accommodate 21 to 29 aircraft, depending on aircraft size. Additional GA aircraft parking is provided along the south side of Taxiway A. This linear aircraft parking area can accommodate approximately 52 aircraft.

Key West and the Lower Florida Keys attracts visitors and tourist throughout the year. During peak periods, the GA aircraft parking areas become fully occupied and insufficient to meet demand. This requires using a portion of the commercial apron for overflow GA aircraft parking, which contributes to congestion on the commercial apron. Expanding the GA parking apron would accommodate the demand for aircraft parking during peak periods and help reduce congestion on the commercial apron.

**Relocate Section of Airfield Security Fence** – Access to the EYW airfield and Air Operations Area (AOA) is restricted by a security fence. However, approximately 1,500 feet of fence on the north side of the airfield is located within the Runway Object Free Area (ROFA). This section of fence, which does not meet FAA airport design standards, was previously installed to avoid an area of open water adjacent to the runway. Although No Trespassing/Restricted Area signs were placed in the open water area, the County has documented incidents of recreational kayakers and canoers within the ROFA and waters adjacent to the runway. The proposed relocation of security fence would meet FAA airport design standards and enhance safety at EYW.

**ESTIMATED TIMEFRAME:** The Airport Sponsor's proposed timeframe for the Proposed Action and its individual elements is discussed in Section 1.7 of the EA. The timeframe estimates construction activities beginning in 2021 and being completed in 2023.

**ALTERNATIVES:** Alternatives to the Proposed Project were evaluated in Section 2 of the EA. The alternatives considered are described below.

**Taxiway A Extension Alternatives** – Alternatives to the proposed extension of parallel Taxiway A to the Runway 9 end of pavement were considered. The alternatives analysis evaluated construction and use of a full-length parallel taxiway on the north side of the runway. This alternative would require aircraft to cross active Runway 9-27 to access the north-side parallel taxiway and the Runway 9 end, which would increase the safety risk of runway incursions. This alternative would not avoid or reduce impacts to mangrove swamps and saltwater marsh, when compared to the Proposed Action. Given the airport's constrained location and lack of suitable land, this alternative was found to be not reasonable or practical. The alternative was eliminated from further consideration in the EA.

**Commercial Apron Expansion Alternatives** – The commercial aircraft parking apron is bounded by Taxiway A and Runway 27 to the north and the passenger terminal building to the south. The Proposed Action would expand the commercial apron to the east. Due to these site and operational considerations, the alternatives analysis evaluated

expanding the commercial apron to the west. This alternative would substantially encroach upon the GA aircraft parking apron and displace most of a GA aircraft parking positions used by the airport's Fixed Base Operators (FBOs). Suitable land is not available at the airport to construct a replacements apron without affecting mangrove wetlands, saltwater marsh, and salt ponds. A potential site was identified, but was not reasonably close to the aviation support facilities and would substantially encroach into mangroves and a salt pond. In addition, displacing the main GA apron would have a substantial adverse effect on the FBOs and aviation support businesses operating at the airport. This alternative was eliminated from further consideration in the EA.

**General Aviation Apron Expansion Alternatives** – The airport's main GA aircraft apron is bounded by Taxiway A and Runway 9-27 to the north, FBO and commercial aviation buildings and hangars to the south, aircraft storage hangars to the west, and the commercial apron to the east. A smaller GA overflow apron is located approximately 1,600 feet west of the main GA apron.

Expanding the main GA apron was considered, but this would displace and require relocation of hangars and/or aviation support businesses at the airport. Constructing a new GA apron on the north side of the runway was also considered. However, this would require construction of a parallel taxiway, increase runway crossings, and have substantial environmental impacts and operating inefficiencies. These potential alternatives were not considered to be reasonable and were eliminated from further consideration.

Expanding a section of existing GA parking apron located to the west of the main apron was evaluated. This alternative would expand that GA apron to the south. When compared to the Proposed Action, this alternative would result in more impacts to mangroves. This alternative was eliminated from further consideration.

**No-Action Alternative** – Under this alternative, the Proposed Action would not be implemented. The County would continue to maintain and operate the airport in its present state and the environmental effects associated with the Proposed Action would not occur. Although this alternative would not satisfy the purpose of and need for the Proposed Action, it was retained for further detailed evaluation in the EA in accordance with NEPA and CEQ regulations.

**ENVIRONMENTAL IMPACTS:** The Proposed Action and the No-Action Alternative were evaluated for potential impacts on the environmental resource categories identified in FAA Order 1050.1F. The Affected Environment and Environmental Consequences sections of the EA (Sections 3 and 4, respectively) provide a description of existing conditions and an analysis of direct, indirect, and cumulative impacts.

Under the No-Action Alternative, the proposed taxiway, aircraft parking aprons, and security fence improvements would not be implemented and there would be no environmental impacts. Airport design standards related to runway and taxiway separation distance would continue to not be met.

The Proposed Action would increase the size and improve the layout and efficiency of the airport's commercial and general aviation aircraft parking aprons. The EA provides an estimate of the potential additional aircraft operations and enplaned passengers at EYW, if the Proposed Action was implemented. When compared to the No-Action Alternative, the forecast estimated that the Proposed Action could generate an additional 1,700 aircraft operations at the airport in both 2024 and 2029. Similarly, the forecast estimated an additional 78,589 enplaned passengers in 2024 and an additional 78,592 enplaned passengers in 2029, when compared to the No-Action Alternative. Impacts associated with the Proposed Action are discussed below.

**Air Quality** – Monroe County is located in an attainment area for all National Ambient Air Quality Standards (NAAQS) for criteria air pollutants and is not subject to the requirements of a State Implementation Plan. Construction activities would generate temporary air emissions at EYW, including exhaust from equipment and vehicles, as well as, fugitive dust during excavation and grading activities. These emissions, inventoried and evaluated in Section 4.1.3, would be well below *de minimis* thresholds for each year during the construction period and would not cause pollutant concentrations to exceed any of the NAAQS. The EA also notes measures that can be taken to minimize air emissions during construction.

Under the Proposed Action, air emissions at EYW would increase as a result of the projected increase in aircraft operations and passengers. The operational aircraft emissions inventory Section 4.1.4 shows only an incremental change in aircraft air emissions. The evaluation of the change in vehicle trips associated with the Proposed Action and the change in vehicle emissions would be minor. The operational air emissions would be below *de minimis* thresholds in each study year and the emissions not cause pollutant concentrations to exceed any of the NAAQS. The Proposed Action would not have a significant impact on air quality.

**Biological Resources** – The Proposed Action would fill approximately 3.14 acres of mangrove swamp, 4.03 acres of saltwater marsh, 0.09 acre of salt ponds/embayment, 0.07 acre of upland Brazilian pepper, and 0.25 acre of exotic wetland hardwoods (wetland Brazilian pepper). An additional 0.20 acres of mangrove swamp would be cleared of vegetation, but not filled. The affected areas, impacts, and potential mitigation measures were discussed with regulatory agencies during the preparation of the EA.<sup>4</sup>

The County proposed a conceptual mitigation plan in the EA and Biological Assessment. Compensatory wetland mitigation opportunities were identified both on-site and off-site

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<sup>4</sup> Information related to the Proposed Action, project construction areas and anticipated impacts were initially presented at an Agency Scoping Meeting held on September 19, 2019. Regulatory agencies invited to participate included the US Environmental Protection Agency, US Army Corps of Engineers, US Fish and Wildlife Service, National Marine Fisheries Service, Florida Fish and Wildlife Conservation Commission, and the South Florida Water Management District. Follow-up web-based meetings specific to biological resource impacts and conceptual mitigation were conducted on April 27, 2020, and September 18, 2020.

and include wetland restoration/creation, enhancement, and preservation. The conceptual on-site mitigation would restore both saltwater marsh and mangrove communities along the periphery of the degraded salt ponds and enhance tidal flow through the salt ponds.<sup>5</sup> Off-site mitigation would be provided at selected sites in the Lower Florida Keys. The County will prepare a final mitigation plan during the Proposed Action's permitting phase.

**Essential Fish Habitat** – The Proposed Action will affect 7.71 acres of Essential Fish Habitat (EFH). Subject to the provisions of the Magnuson-Stevens Fishery Conservation and Management Act, the FAA consulted with the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS) in regard to the Proposed Action's effect on EFH. To offset unavoidable impacts to EFH, the County's conceptual mitigation plan proposed 8.57 acres of onsite and offsite wetland creation, restoration, and enhancement. During consultation, NMFS provided, and FAA agreed to, the following EFH Conservation Recommendations: 1) develop a complete compensatory mitigation plan based on functional assessments, including supporting information, that demonstrates all adverse impacts to EFH are fully offset and 2) use of Best Management Practices, including use of staked silt fences around work areas, to prevent sediment-laden runoff during construction and minimize impacts to adjacent mangrove wetlands. Although the FAA would make its environmental determination under NEPA, it was agreed that EFH consultation with NMFS would be ongoing until the draft and final mitigation plan is approved.

**The environmental approval provided in this Finding of No Significant Impact and Record of Decision is contingent on the conclusion of FAA's consultation with the NMFS on EFH. This requires Monroe County to develop a complete and final mitigation plan(s) that is coordinated with FAA and NMFS. The County will also be required to include appropriate BMPs in project plans and specifications to prevent sediment-laden runoff during construction. Until such time that consultation is concluded, Monroe County shall not alter or affect any EFH at the Key West International Airport.**

**Federally-Listed Species / Section 7 Consultation** – No designated or proposed critical habitat for any protected species is located on Airport property or would be affected by the Proposed Action. Through consultation with the U.S. Fish and Wildlife Service (USFWS), it was determined the Proposed Action would have no effect on the Florida semaphore cactus, Garber's Spurge, Cape Sable Thoroughwort, Eastern indigo snake, piping plover, red knot, and roseate tern. The USFWS concurred that the Proposed Action may affect, but not likely to adversely affect the West Indian manatee. The County will be required to implement the USFWS's Standard Manatee Construction Conditions for Inwater Work during construction. Protected species consultation was also initiated with NMFS. NMFS

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<sup>5</sup> The Sponsor's on-site compensatory mitigation plans will require FAA review and approval during the project's design and permitting phase to ensure safety and compliance with applicable airport certification requirements.

concluded that the Proposed Action is not likely to adversely affect listed species under the agency's purview.

**State-Listed Species** – No effects on state-listed plant and animal species are anticipated.

The Proposed Action would not jeopardize the continued existence of a Federally-listed threatened or endangered species and would not result in the destruction or adverse modification of federally-designated critical habitat. Mitigation and conservation measures would be implemented to offset impacts on habitat and protected species. The Proposed Action would not result in significant impacts on biological resources.

**Climate** – Greenhouse gas (GHG) emissions associated with the construction of the proposed airfield improvements are expected to be minor and temporary. The increase aircraft operations and vehicle trips at EYW would result in a minor increase in GHG emissions at the airport. The Proposed Action would not result in significant climate or climate change impacts.

**Coastal Resources** – Monroe County is located within a coastal zone and federal actions must be consistent with the Florida Coastal Management Program (FCMP). The airport is not located within a designated Coastal Barrier Resources System (CBRS). The Draft EA was submitted to the Florida State Clearinghouse, which coordinates coastal consistency review among state agencies. Through this review, the state had no objection to the Proposed Action and found it to be consistent with the FCMP. The state's final consistency determination will be made during the project's environmental permitting process. Based on the analyses contained in the EA and the State of Florida's consistency review, the Proposed Action would not have a significant coastal resource.

**DOT Act, Section 4(f) Resources** – No publicly-owned parks, recreation areas, or wildlife and waterfowl refuge of national, state, or local significance would be directly affected by the Proposed Action. Seven Section 4(f) recreation resources and one property listed on the National Register of Historic Places were identified in the EA's Indirect Effects Study Area. The Fran Ford White-crown Pigeon Preserve at Little Hamaca Park and Little Hamaca Park are adjacent are adjacent to the north side of the airfield.

The Proposed Action would not result in air quality or water quality impacts that could affect potential Section 4(f) properties, nor would it affect access to Section 4(f) properties. The Proposed Action would cause a modest increase in aircraft noise in the vicinity of the airport and the noise exposure contours would shift slightly to the west. This shift would increase the amount of land exposed to DNL 65 noise and higher within the Fran Ford White-crowned Pigeon Preserve by 1.23 acres and the 11th Street Public Boat Ramp by 0.02 acres by 2029. Approximately 65.8 additional linear feet of the Florida Keys Overseas Heritage Trail would be exposed to noise levels of DNL 65 and higher in 2029. These resources are not managed for quiet setting. The area exposed to noise levels DNL 65 and higher would be reduced by 0.5 acre at the Little Hamaca Park. No historic resource listed on the National Register would be within the area exposed to aircraft noise levels of

DNL 65 dB and higher. Due to its proximity to west end of Runway 9-27, a small portion of the Fran Ford White-crowned Pigeon Preserve is presently exposed to aircraft noise levels above DNL 70. When compared to the No-Action Alternative, approximately 0.09 acre of land in the southeast corner of the preserve would be exposed to DNL 75.7 in 2024 and 0.12 acre exposed to 75.9 in 2029. The increase in noise in this area, when compared to the No-Action Alternative would be approximately DNL 1.2 dB in 2024 and 2029. Land-use compatibility guidelines in 14 CFR Part 150 indicate that parks are compatible with noise levels up to DNL 75 dB, therefore, the small portion of the Fran Ford White-crowned Pigeon Preserve exposed to DNL 75 dB with implementation of the Proposed Action would be considered incompatible. However, the attributes, setting, and use of this resource are not managed for a quiet setting and they would not be substantially diminished by the Proposed Project and would not result in a constructive use of the Fran Ford White-crowned Pigeon Preserve.

Noise levels associated with the Proposed Action would result in relatively small increases at some Section 4(f) resources, but would also slightly reduce noise levels at others. Overall, the effects associated with the Proposed Action would not be significant and would not result in a constructive use of any Section 4(f) resources.

**Farmlands** – The Proposed Action would not affect any farmland or prime, unique, or statewide and locally important farmland soils.

**Hazardous Materials, Solid Waste, and Pollution Prevention** – An environmental database search and site reconnaissance revealed no known sites or areas with environmental concerns within the areas where construction would occur. Although a slight increase in the use of hazardous materials and waste generation may occur during construction, the Proposed Action would have minimal effect on hazardous waste generation, storage, or transport practices at the airport. The Proposed Action will not substantially increase solid waste generation at the airport. No significant impacts related to hazardous materials, solid wastes, and pollution are anticipated.

**Historical, Architectural, Archeological and Cultural Resources** – A review of the Florida Master Site File and field surveys showed no previously recorded historic, archaeological, or cultural resources within the Area of Potential Effect (APE) subject to disturbance during construction. No structures are located within the areas where construction would occur. Eleven structures and features over 50 years old were identified in the Indirect Effects portion of the APE, but all were determined to be ineligible by FAA for listing in the National Register.

Consultation was initiated with the Florida State Historic Preservation Officer (SHPO) and five Native American Indian tribes. The Seminole Tribe of Florida confirmed that the Proposed Action falls within their area of interest and stated the tribe has no objection to the Proposed Action, but requested to be notified if any archaeological, historical, or burial resources are inadvertently discovered during construction. The SHPO concurred with FAA's finding that the Proposed Action would have no effect on historic properties.

Based on the research and consultation conducted, the Proposed Action would not affect historic architectural, archaeological, and cultural resources.

**Land Use** – The Proposed Action would not conflict with or affect existing or planned off-airport land uses or zoning. The Proposed Action would not cause significant off-airport impacts, divide or disrupt the community, or otherwise influence land use patterns or development near the Airport.

The Proposed Action is consistent with the aviation-related policies and objectives in Monroe County's Comprehensive Plan. However, the EA notes that impacts to mangrove wetlands and salt ponds (county-wide) are not currently allowed under Monroe County's Comprehensive Plan. The EA further notes that amendments to the Comprehensive Plan are being considered that would allow airport improvements that affect impact wetland areas, when the improvements are consistent with the approved Airport Master Plan and ALP, no other viable alternative available, and mitigation is provided.

Amendments to the Comprehensive Plan necessary to implement the Proposed Action require local approval. The need to amend the Comprehensive Plan could be a substantial issue locally, but would not necessarily result in a significant impact under NEPA. Based on the information considered, the Proposed Action would not have a significant impact on land use or land use controls if the Proposed Action is approved locally and mitigation is provided.

**The environmental approval provided in this Finding of No Significant Impact and Record of Decision is contingent on the Airport Sponsor demonstrating the Proposed Action's consistency with the Monroe County Comprehensive Plan and obtaining necessary approvals. Until such time that consistency is demonstrated and approvals are obtained, Monroe County shall not alter or affect the mangrove wetlands, salt marsh, and salt ponds/embayments identified in the EA.**

**Natural Resources** – Construction of the Proposed Action would use common materials that are not unusual or in short supply. Given the location of the airport, these materials may be hauled from mainland south Florida locations. The Proposed Action would have a minor effect on energy and fuel consumption at EYW. No significant natural resource or energy supply impacts would occur.

**Noise** – Construction-related noise would be temporary and the effects would not be significant. The Proposed Action would result in a modest increase aircraft operations at the airport. In addition, the extension of Taxiway A to the end of Runway 9 would allow all east-flow departures to begin take-offs from the end of Runway 9 pavement.

When compared to the No-Action Alternative in study year 2024, the Proposed Action would increase the number of dwelling units (+18) and persons (+35) exposed to noise levels greater than DNL 65 dB; however, fewer dwelling units (-3) and persons would be exposed to noise levels greater than DNL 70 dB (-8). Similarly in 2029, the Proposed

Action would slightly increase the number of dwelling units (+20) and persons (+40) exposed to noise levels greater than DNL 65 dB; however, fewer dwelling units (-2) and persons would be exposed to noise levels greater than DNL 70 dB (-4). A majority of the residential units within the DNL 65 and higher noise contours have participated in the County's ongoing Part 150 Noise Insulation Program and these residential land uses are considered to be compatible with existing and projected aircraft noise levels.

In both study years, none of the residences located within, or newly within, the DNL 65 contour would experience a noise increase of DNL 1.5 dB or greater. Based on FAA's guidance for preparing NEPA impact evaluations, significant noise impacts would not occur if the Proposed Action was implemented. Therefore, mitigation is not required for the purpose of reducing the impact below the threshold indicating a significant impact. Although mitigation is not required for this project under FAA's NEPA guidelines, the County will continue to evaluate ongoing programs to address land use compatibility issues that result from operation of the airport.

**Socioeconomics, Environmental Justice, And Children's Environmental Health and Safety Risks** – Construction would generate temporary construction employment. The Proposed Action would not affect public service demands and would not require the acquisition of land nor would it displace any residences or businesses. No significant socioeconomic impacts would occur. The additional passengers that could be realized under the Proposed Action would increase the number of vehicle trips at the airport. However, the increase is not expected to be substantial and would not disrupt local traffic patterns or reduce the Level of Service on roads serving the airport.

Because the project would not have significant impacts, disproportionately high and adverse environmental effects on minority and low-income populations would not occur. The project site would not affect any schools, daycare facilities, parks, or children's health clinics. No significant socioeconomic, Environmental Justice, and children's health and safety risk impacts would occur.

**Visual Effects Including Light Emissions** – Construction activities would mostly take place during normal daytime hours. However, construction of the taxiway extension is expected to occur routinely at night during the first year of construction to minimize impact to airfield operations during the day. Apron construction would require less nighttime construction. Common equipment and measures are available to minimize light emissions at night. Existing vegetation between the airfield and residential areas would further reduce the potential effects of construction lighting. No significant impacts related to construction light emissions would occur.

The Proposed Action includes installation of additional pavement edge lighting, airfield signage, and apron lighting. The lighting systems would be similar to those currently used at the airport and would not substantially increase the amount or intensity of airfield lighting. The Proposed Action would not alter the visual characteristics of the airfield. Significant impacts related to visual effects and lighting are not anticipated.

## Water Resources

**Wetlands** – The Proposed Action would affect 7.71 acres of jurisdictional waters, including mangrove swamp, saltwater marsh, salt ponds/embayment, and exotic wetland hardwoods. Measures to avoid wetland impacts are not available and measures to minimize impacts were considered. The Proposed Action’s unavoidable wetland impacts require federal and state permit authorization. The compensatory mitigation plan described in the EA would offset the loss of functional value of the affected wetlands. The final and complete mitigation plan would be developed during the project’s permitting and design phase.

The Airport Sponsor is required to obtain all necessary environmental permits and authorizations prior to starting any construction activities that would affect federal and state jurisdictional waters, including wetlands. Based on early agency coordination and mitigation measures discussed in the EA, options to provide compensatory mitigation are available to offset the wetland impacts. Significant wetland impacts are not anticipated.

**Floodplains** – The proposed action is located entirely within a 100-year floodplain and would involve the placement of fill in 7.71 acres of wetland and salt pond habitat. No substantial aboveground structures would be constructed as part of the Proposed Action. There would be no increase in flood elevations as the flood elevations are based coastal storm surges. The Proposed Action is not expected to result in notable adverse impacts on natural and beneficial floodplain values. In accordance with Executive Order 11988, *Floodplain Management*, there is no practicable alternative to the Proposed Action. Design of the proposed project’s elements require state and local approvals, including construction in floodplains. The Proposed Action would not result in a significant impact to floodplains.

**Surface Waters and Groundwater** – As noted above, the Proposed Action would affect surface waters and wetlands. Construction of the Proposed Action would create a net increase of impervious surface at EYW (3.9 acres). Stormwater discharges from the new taxiway and apron pavements would be collected and treated through a combination of improvements to the airport’s existing stormwater management system (e.g., exfiltration trenches) and, for certain discharges, overland flow. The engineering design and permitting process would identify the specific requirements and stormwater system improvements.

Commonly-accepted measures to minimize erosion and sedimentation to maintain water quality during construction are available and would be required in the project’s construction plans and specifications. Measures outlined in FAA Advisory Circular 150/5370.10H, *Standards for Specifying the Construction of Airports*, would also be incorporated into the plans to minimize the potential for water quality impacts. The contractor will be required to obtain and comply with the conditions contained in the state-issued National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges from construction activities. Given the measures available to prevent pollutants

in stormwater runoff, the construction and operation of the proposed airfield improvements is not anticipated to have a significant impact on surface waters or groundwater.

**Drinking Water Supplies** – The Proposed Action may increase the number of passengers at EYW; however, the increase would be modest and would not have a significant impact on public drinking water infrastructure or supplies.

**Wild and Scenic Rivers** – The proposed action will not affect Wild and Scenic Rivers or river segments included in the National Rivers Inventory.

**Cumulative Impacts** – The past, present, and future cumulative projects identified in Section 4.14 of the EA have generated, or are anticipated to generate, low levels or no environmental impacts. The projects are subject to different environmental regulatory programs, some of which may require mitigation to reduce impacts below levels considered significant. The impacts associated with the Proposed Action, when considered in addition to other cumulative projects, are not expected to exceed thresholds that would indicate a significant impact.

### **OTHER FEDERAL, STATE AND LOCAL ACTIONS AND PERMITS:**

Monroe County is required to obtain all permits and regulatory approvals necessary to implement the Proposed Action. The permits identified in the EA are listed below.

- U.S. Army Corps of Engineers – Section 404 permit for unavoidable impacts to Waters of the United States, including wetlands.
- South Florida Water Management District – Environmental Resource Permit (ERP)
- Florida Department of Environmental Protection – NPDES Generic Permit for Stormwater Discharge from Large and Small Construction Activities and NPDES Stormwater Program and Multi-Sector General Permit
- Monroe County – Comprehensive plan consistency and land development approvals
- Local building and construction permits

**CONSISTENCY WITH APPROVED PLANS OR LAWS:** The Proposed Action is consistent with the current Airport Layout Plan and with environmental plans, laws, and administrative environmental determinations of federal, state, and regional agencies. As discussed in Section 4.8.3.2 of the EA, amendments to Monroe County's Comprehensive Plan and Land Development Code and issuance of local approvals related to mangrove and wetland impacts are required before the project can be implemented.

**MITIGATION MEASURES:** Mitigation for the Proposed Action is summarized in this section and is described more fully in the EA (Section 4.13.5 and Appendix C). The Airport Sponsor has proposed conceptual plans to provide compensatory mitigation for

unavoidable impacts to Waters of the U.S., including wetlands. The conceptual mitigation plans are based on site-specific functional assessments using the Uniform Mitigation Assessment Method (UMAM). The mitigation measures identified in the EA are expected to reduce environmental impacts to levels below thresholds indicating a significant impact in the following categories: Biological Resources (Essential Fish Habitat), Coastal Resources, and Water Resources (wetlands). Mitigation is also required for the Sponsor's application for federal Section 404 permit and state Environmental Resource Permit authorizations to implement the Proposed Action. Final and complete mitigation plans will be developed during the permit application review process.

**Proposed Mitigation Plan** – The Proposed Action would require the placement of fill in 7.51 acres of wetlands and the clearing of 0.20 acres of wetland. Based on the Uniform Mitigation Assessment Method (UMAM), the proposed impacts would result in a functional loss of approximately 3.83 UMAM credits (final UMAM scores would be determined during the permitting process).

Both on-site and off-site mitigation is proposed. The conceptual plan includes a combination of wetland restoration and creation, enhancement, and preservation that would provide a total functional gain of 3.84 UMAM credits. The proposed on-site mitigation would restore and create saltwater marsh and mangrove communities along the periphery of salt ponds and enhance tidal flow through the ponds. This would primarily be accomplished through the removal of remnant fill (approximately 3.4 acres) and use of remaining available on-site mitigation credits. Due to the limited availability of suitable land for mitigation in Key West, off-site mitigation would be provided on publicly-owned land located in the Lower Florida Keys (Cudjoe Key and Summerland Key). Other opportunities to offset the impacts at off-site locations may be identified during permitting process. If necessary, additional credits would be provided through the purchase and restoration of wetlands located on private property. The proposed mitigation plan was presented to and discussed with federal and state regulatory agencies during the preparation of the EA.

The development of on-site mitigation plans during the project's design and permitting phase will require FAA review to ensure the continued safe operation of the airport. For any on-site mitigation, Monroe County will be obligated to take immediate action to alleviate wildlife hazards whenever they are detected (14 CFR 139.337, Wildlife Hazard Management). Actions taken by the County to address potential wildlife hazards would be consistent with FAA Advisory Circular 150/5200.33C, *Hazardous Wildlife Attractants on or Near Airports*, and the 2003 Memorandum of Agreement (MOA) Between the Federal Aviation Administration, the U.S. Air Force, the U.S. Army, the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service, and the U.S. Department of Agriculture to Address Aircraft-Wildlife Strikes. In accordance with FAA guidance and the MOA, Monroe County would coordinate with the appropriate agencies prior to implementing measures within these mitigation areas to resolve any wildlife hazards, should they be warranted.

**PUBLIC INVOLVEMENT:** At the outset of the environmental study, letters were sent to 35 federal, state, and local agencies to inform them of the proposed airport improvements and preparation of the EA. A virtual Agency Scoping meeting and in-person Public Scoping meeting were conducted to gather information and help identify key issues to be addressed in the EA.

The Draft EA was made available for review by the public, government agencies, and interested parties. A Notice of Availability of the Draft EA was published on the airport's website and in the *Key West Citizen* newspaper on November 13, 2020. A Public Information Workshop on the Draft EA was held on Tuesday, December 15, 2020. The comment period on the Draft EA began on November 13, 2020, and closed on December 22, 2020.

Five comment letters were received on the Draft EA. Two commenters expressed concerns about aircraft noise; one commenter expressed support for the Proposed Action; a representative of the USEPA provided comments on the topics of air quality, climate change, contaminated sites, and stormwater management; and a representative from the Florida State Clearinghouse provided information on coastal resources and permit requirements. Several of the comments resulted in clarifications to the EA, but no substantive issues affecting the conclusions documented in the EA were raised. The County and the FAA reviewed and considered all comments in the preparation of the Final EA. The comment letters and responses to these comments are provided in Appendix H of the EA.

**FUNDING:** The EA indicates that the Proposed Action would be implemented using a combination of FAA Airport Improvement Program grants, Passenger Facility Charge collections, Florida Department of Transportation grants, and County funds.

The EA provides information necessary for the FAA to fulfill its obligations under NEPA. The FAA's environmental findings on the Proposed Action do not signify an FAA commitment to provide financial support for the proposed project. A funding commitment can only be made if, and when, Monroe County submits a federal grant application for a specific, eligible project and FAA's consideration of the separate Federal funding criteria prescribed by 49 USC 47115(d) and 49 USC 40117.

**FEDERAL FINDING OF NO SIGNIFICANT IMPACT:** I have carefully and thoroughly considered the facts contained in the attached Environmental Assessment (EA). Based on my independent review, I find the EA is consistent with FAA's regulations and is consistent with the Council on Environmental Quality's regulations implementing the *National Environmental Policy Act* (NEPA) (40 CFR Part 1500) as well as FAA's Orders 1050.1F and 5050.4B for implementing the procedural provisions of NEPA. Consequently, I find the proposed Federal action will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to section 102(2)(C) of NEPA. As a result, the FAA issues this Finding of No Significant Impact, determining that an Environmental Impact Statement for this action is not necessary.

APPROVED: BARTHOLOMEW VERNACE  Digitally signed by BARTHOLOMEW  
VERNACE  
Date: 2021.03.19 14:05:46 -04'00'  
Bart Vernace, Manager, Orlando Airports District Office

DATE: March 19, 2021

DISAPPROVED: \_\_\_\_\_

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 action 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 action 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.

APPROVED: BARTHOLOMEW VERNACE  
Bart Vernace, Manager, Orlando Airports District Office

 Digitally signed by BARTHOLOMEW  
VERNACE  
Date: 2021.03.19 14:06:24 -04'00'

DATE: March 19, 2021

DISAPPROVED: \_\_\_\_\_

DATE: \_\_\_\_\_