

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WESTERN-PACIFIC REGION

***Written Re-Evaluation of the
2020 Adoption of an Environmental Assessment
and
Finding of No Significant Impact***

for the
**Proposed Construction of a New Entry Control Facility
and Associated Components at
Tucson International Airport**

Tucson, Pima County, Arizona



For further information

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**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION**

**WRITTEN RE-EVALUATION OF THE
2020 ADOPTION OF AN ENVIRONMENTAL ASSESSMENT AND
FINDING OF NO SIGNIFICANT IMPACT FOR**

**PROPOSED CONSTRUCTION OF A NEW ENTRY CONTROL FACILITY
AND ASSOCIATED COMPONENTS
AT TUCSON INTERNATIONAL AIRPORT**

Introduction

On April 1, 2020, the Federal Aviation Administration (FAA) adopted a Final Environmental Assessment (EA)¹ and issued a Finding of No Significant Impact (FONSI) for its federal action to approve an Airport Layout Plan (ALP) update at Tucson International Airport (TUS) located in Tucson, Pima County, Arizona. The U.S. Air Force prepared the Final EA in coordination with the Tucson Air National Guard, and the FAA served as a cooperating agency. The U.S. Air Force issued its FONSI on December 16, 2019. The proposed ALP change would entail removing an aircraft hangar operated by Aerovation to make way for Tucson Air National Guard's new entry control facility and adding a new replacement hangar at another site within TUS.

On December 9, 2020, the Tucson Airport Authority (TAA), which operates TUS, requested that the FAA consider a different site for Aerovation's replacement hangar located 1000 feet southeast of the site analyzed in the Final EA. The originally proposed replacement site covered nine acres, and the newly proposed one would occupy five acres.

On February 4, 2021, the FAA determined that it had authority² to approve or disapprove:

- the construction of the proposed aircraft hangar;
- the construction of the proposed aircraft parking apron; and
- the construction of a proposed taxiway connector.³

The FAA also determined that it lacked authority⁴ to approve the proposed vehicle parking lots and vehicle access road improvements.⁵

¹ Final Environmental Assessment for the Proposed Construction of a New Entry Control Facility and Associated Projects, Tucson Air National Guard Base (ANGB), Tucson International Airport, December 2019. This document is presented in an errata sheet format and based on portions of the Draft Environmental Assessment for the Proposed Relocation of the Taiwan Air Force, dated June 2018, relating to the Entry Control Facility.

² Per Section 163(b) of the FAA Reauthorization Act of 2018, Pub.L. 115-254 (2018).

³ Letter, Mike N. Williams to Danette Bewley, Tucson International Airport (TUS) Section 163 Analysis - Aerovation Hangar, February 4, 2021.

⁴ Per Section 163(d) of the FAA Reauthorization Act of 2018, Pub.L. 115-254 (2018).

⁵ Letter, Mike N. Williams to Danette Bewley, Tucson International Airport (TUS) Section 163 Analysis - Aerovation Hangar, February 4, 2021

In June 2021, TAA evaluated the proposed new site for potential environmental impacts. The resulting study is titled “Technical Memorandum: Re-evaluation of Final Environmental Assessment for the Proposed Construction of a New Entry Control Facility and Associated Projects, Tucson Air National Guard Base (ANGB), Tucson International Airport” dated October 13, 2021 and revised December 1, 2021. The FAA incorporates this document by reference.

TAA plans to authorize construction of the replacement Aerovation hangar in January 2022. The FAA prepared this written re-evaluation, because there are changes to the FAA’s proposed action that could trigger the need for a supplemental National Environmental Policy Act document per FAA Order 1050.1F, Paragraph 9-2(a)(2)(a).

Changes to the Proposed Action

FAA’s originally proposed action is presented in the Final EA (Technical Memorandum, Attachment 4, Pages 2-17 to 2-20) as part of the U.S. Air Force’s larger action, which at that time included relocating the Taiwan Air Force from Luke Air Force Base to places such as Tucson Air National Guard Base at TUS. The only change to the FAA’s proposed action is the location of Aerovation’s replacement hangar site. The locations of the original proposed nine-acre site and the newly proposed five-acre site are shown in the Technical Memorandum (Figures 1, 2, 3 & 5). The newly proposed site is described in the Technical Memorandum (Pages 4-6).

Re-Evaluation of Environmental Consequences

TAA conducted a biological resources assessment (Technical Memorandum, Attachment 2) and an archaeological survey (Technical Memorandum, Attachment 3) of the newly proposed five-acre site for the Aerovation hangar. They also analyzed the changes’ impacts to the following resource categories, which were analyzed in detail in the Final EA:

- Air quality
- Biological resources
- Hazardous material, pollution prevention, and solid waste
- Historical, architectural, archaeological, and cultural resources
- Land use
- Noise and noise-compatible land use
- Socioeconomic (traffic)
- Safety⁶
- Cumulative impacts

The environmental analysis, which included checking for new information, such as an updated species list from U.S. Fish and Wildlife Service and a previously conducted archaeological survey, is further described in the Technical Memorandum (Pages 6-10). The proposed new site occurs within Tucson International Airport and the general study areas used for the environmental analysis in the Final EA.

⁶ Although safety is not an environmental impact category listed in FAA Order 1050.1F Paragraph 4-1, the U.S. Air Force analyzed it in the Final EA.

Biologists didn't identify the presence of federally listed species or critical habitat in the newly proposed five-acre site for the Aerovation hangar. They examined a larger area than necessary (9.74 acres), because it was expedient to examine all of the vacant land between the existing buildings and pavements. The FAA finds "no effect" for the proposed action under Section 7 of the Endangered Species Act. The biologists noted that the site contains noxious weeds, such as bufflegrass and Malta star thistle, could contain birds and nests protected by the Migratory Bird Treaty Act, and contains plants covered by the Arizona Native Plant Law and City of Tucson Native Plant Preservation Ordinance. In the Technical Memorandum (Page 7), TAA commits to the following avoidance and minimization measures:

- Wash equipment prior to arrival on-site to minimize the spread of noxious weeds;
- Conduct vegetation removal activities outside of nesting bird season (March 1 to August 31), avoid active nests, or obtain permits and relocate protected species using qualified personnel if they can't be avoided;
- Issue a notice of intent to clear land under Arizona Native Plant Law; and
- Prepare and implement a treatment plan under the city's Native Plant Preservation Ordinance.

Archaeologists didn't identify any archaeological sites within the newly proposed five-acre site for the Aerovation hangar; they identified one isolated artifact occurrence consisting of a Hohokam cultural red-on-brown ceramic sherd. This survey, which occurred in 2017, covered 13 acres and was conducted prior to the construction of a hangar located next to the proposed Aerovation hangar. On May 18, 2018, the U.S. Air Force and the Arizona State Historic Preservation Officer concurred with a finding of "no historic properties affected" for the undertaking as originally defined (Technical Memorandum, Attachment 4, Page 4-32). The U.S. Air Force deferred to the FAA regarding the discovery of the newly proposed five-acre site for the Aerovation hangar, because it occurs entirely within the FAA's portion of the undertaking. The FAA finds that historic properties aren't present within the undertaking's revised area of potential effects (Technical Memorandum, Figure 3), and no further consultation is needed per 36 CFR 800.13(b). The procedures for reporting cultural resource discoveries described in the Final EA (Technical Memorandum, Attachment 4, Page 6-2) are adequate and apply to the newly proposed five-acre site for the Aerovation hangar.

Environmental analysts didn't identify any significant impacts associated with the proposed action. That is, the impacts associated with the newly proposed five-acre site for the Aerovation hangar, when combined with the impacts identified in the Final EA, wouldn't exceed significance thresholds. The proposed avoidance and minimization measures described in the Final EA (Technical Memorandum, Attachment 4, Pages 6-1 to 6-2) are adequate and apply to the newly proposed five-acre site for the Aerovation hangar.

Conclusion

The FAA previously adopted a Final EA and issued a FONSI (Technical Memorandum, Attachment 1) for the proposed action on April 1, 2020. The three conditions, per FAA Order


1050.1F, Paragraph 9-2(c), a new or supplement National Environmental Policy Act (NEPA) document would not be needed are:

- the proposed action conforms to the plans or projects for which a prior EA or FONSI have been issued, and there are no substantial changes in the action that are relevant to environmental concerns;
- data and analyses contained in the previous EA and FONSI are still substantially valid and there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts; and
- pertinent conditions and requirements of the prior approval have been, or will be met in the current action.

I carefully and thoroughly considered the facts contained in this Written Re-evaluation. Based on that information, I find that the conditions for not preparing a supplemental EA listed in FAA Order 1050.1F, Paragraph 9-2(c) have been met. Therefore, the FAA will not prepare a supplemental EA or other NEPA document for this action.

APPROVED:

**MICHAEL N
WILLIAMS**

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12-21-2021

Mike N. Williams
Manager
Phoenix Airports District Office

Date

DISAPPROVED:

Mike N. Williams
Manager
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Date