

Willmar Municipal Airport

Draft Environmental Assessment



April 2010

Report Prepared By:
City of Willmar

Draft Environmental Assessment

For the

Land Release of the Former Willmar Municipal Airport

Project Sponsor:
City of Willmar

Federal Agency:
Federal Aviation Administration
Minneapolis Airports District Office

Report Prepared By:
City of Willmar

The Proposed Action consists of the release of the City of Willmar from Federal obligations associated with the former Willmar Municipal Airport from the Federal Aviation Administration.

This Environmental Assessment becomes a Federal document when evaluated and signed by the responsible FAA official.

Responsible FAA Official

Date

Table of Contents	Page Number
1.0. Background	1
2.0. Purpose and Need	1
2.1. Need	1
2.2. Purpose	1
3.0. Alternatives	2
3.1. No Action	2
3.2. Proposed Action	2
4.0. Descriptions of Previous Projects	3
4.1. County State Aid Highway 47	3
4.2. Willmar Municipal Utilities Transmission Line	4
4.3. Willmar Avenue Extension	4
4.4. Phase I Development at Former Airfield	4
4.5. Kandiyohi County Humane Society Building	5
4.6. Land Swap	5
4.7. Lease of Hangar and Apron	5
4.8. Repaving and Repair of Baseball Parking Lot	5
5.0. Affected Environment and Environmental Consequences	6
5.1. Air Quality	6
5.2. Biotic Resources	6
5.3. Threatened and Endangered Species	7
5.4. Coastal Resources	7
5.5. Compatible Land Use	7
5.6. Construction Impacts	8
5.7. Cultural Resources	8
5.7.1. Area of Potential Effect (APE)	9
5.7.2. Efforts to Identify Historic Properties	9
5.7.3. Description of Affected Historic Properties	9
5.7.4. Effects on Historic Properties	10
5.7.5. Summary of Consultation and Public Involvement	10
5.7.6. Current Status	11
5.8. Department of Transportation Section 4(f)	11

5.9.	Energy	11
5.10.	Farmlands	12
5.11.	Floodplains	12
5.12.	Hazardous Materials and Solid Waste	12
	5.12.1. Hazardous Materials	13
	5.12.2. Solid Waste	14
5.13.	Light Emission and Visual Impacts	14
5.14.	Noise	14
5.15.	Socioeconomic Impacts	14
	5.15.1. Environmental Justice	15
	5.15.2. Secondary Impacts	15
5.16.	Water Quality	15
5.17.	Wetlands	18
	5.17.1. CSAH 5 Project	19
	5.17.2. Kvam Land Swap	19
	5.17.3. Proposed Action	19
5.18.	Wild and Scenic Rivers	19
6.0.	Cumulative Impacts	20
7.0.	Mitigation	21
8.0.	Coordination	22

Appendices:

Appendix A – Maps/Aerial Photos

- A-1 - General Location
- A-2 – Aerial Photograph with Former Willmar Municipal Airport Boundary
- A-3 – FEMA 100-Year Floodplain Map
- A-4 – Former Willmar Municipal Airport Parcel Map
- A-5 – New Willmar Municipal Airport and the Former Airport
- A-6 – Projects Completed Prior to Completion of Land Release
- A-7 – Topographic Map
- A-8 – Rau Prairie Pothole Wildlife Management Area
- A-9 – City of Willmar Zoning Map

Appendix B – Future Redevelopment Plans for Former Airfield

Appendix C – Agency Coordination

Appendix D – Cultural Resources

- D-1 – APE
- D-2 – Executive Summaries from the Survey of Cultural Resources and Addendum
- D-3 - Determinations of National Register Eligibility Report Recommendations
- D-4 – Boundaries of Proposed Easement & Historic Property Eligible for Listing
- D-5 – Adverse Effect Finding – No Longer Valid
- D-6 - Coordination

Appendix E- Wetland Delineation and Addendum

Appendix F- Categorical Exclusion for CSAH 5(47) Road Construction

Appendix G- Phase 1 Environmental Due Diligence Audit

Appendix H- LUST Report and Closure

Appendix I – October 2009 Noncompliance letter

Appendix J – City of Willmar’s 2009 Comprehensive Plan

Appendix K – City of Willmar’s Stormwater Management Ordinance

Appendix L – Wellhead Protection

Appendix M – Stormwater Pond Drainage Area

1. Background

In September 2006, the Willmar Municipal Airport was relocated to a site approximately 2 miles west of the former airfield (Appendix A-5). The former airfield is located entirely within the corporate limits of the City of Willmar and consists of approximately 560 acres (Appendix A-2). Infrastructure on the site includes a 5,700 foot primary runway, a 3,562 foot turf crosswind runway, taxiway, apron area, and several aircraft hangars/outbuildings. The infrastructure occupies only a small fraction of the site; a majority of the site is open space that is leased for agricultural crop production.

The former airfield borders the existing Industrial Park (northeast), State Highway 40 (south and east), US Highway 12 (north) and 45th Street (west). There are other industrial land uses along US Highway 12 and State Highway 40. Agricultural crop production occupies a majority of the land west and south of the site.

2. Purpose and Need

2.1. Need

The City of Willmar (the City) is requesting a land release to comply with grant assurances tied to both the former and newly constructed airports.

The Airport relocated in 2006 after a November 1997 Master Plan Report identified several deficiencies at the former airfield, including: inadequate localizer approach, deficient Runway Protection Zones, and obstructions to both the TERPS and FAR Part 77 Surfaces. All aviation activity from the former airfield was transferred to the new airport. Therefore the vacant former airfield is no longer needed for aviation purposes.

When an airport sponsor accepts Federal grants from the Federal Aviation Administration (FAA) for airport improvement projects, they agree to comply with various grant assurances associated with the funds to assure that the public interest in civil aviation is served. One of these assurances, Grant Assurance 31, requires land no longer needed for airport purposes be disposed of, at fair market value, at the earliest practicable time, after obtaining approval from the FAA.

For these reasons, the airport sponsor (the City of Willmar) is requesting a release from the Federal obligations associated with the former airport from the FAA.

2.2. Purpose

The goal of the Proposed Action is for the City to obtain a release from Federal obligations associated with the former airfield from the FAA.

3. Alternatives

3.1. No Action

Under the No Action alternative, the Federal obligations associated with the former airfield would remain in place and redevelopment of the former airfield would not occur. Basic maintenance of the grounds and recently constructed roadways is included, but no other work would occur. The former airfield would otherwise remain as it exists today.

The No Action alternative does not meet the purpose and need. It would prevent the City from complying with their grant assurances and may prevent the City from meeting future industrial development demand. The No Action alternative will be carried forward as a baseline for identifying and evaluating impacts of the Proposed Action.

3.2. Proposed Action

The Proposed Action includes the FAA releasing the City from their Federal obligations associated with the former airport. The City would agree to retain sufficient interest in the property to: (1) assure the right for planes to fly over the site, (2) prevent the creation of a hazard or obstruction for the new airport, and (3) assure compatible land use with the new airport

Future Plans for the Site:

The City plans to redevelop a majority of the former airfield as an expansion to the existing industrial park (Appendix B), which is located adjacent to the site and is nearing capacity. Expanding the industrial park would accommodate projected future industrial demand. The portion of the former airfield located east of State Highway 40 currently has ball fields and the City of Willmar's public works garage. This property would remain as is after the land release.

Proposed Phases of Development:

Redevelopment would occur in a number of phases. Phase I includes demolition of five outbuildings/hangars and approximately 305,000 square feet of runway/taxiway. Notable infrastructure improvements include 7,120 feet of new street construction, 9,400 feet of water and sanitary sewer main, and a 4-acre storm water pond. This phase also includes the extension of County Road 47 north of State Highway 40 and preparing the site for future development. The total cost for this initial phase is approximately \$7.1 million. A 0.5% sale and use tax approved by city voters in November 2004 and a Federal appropriations bill would provide funding for the project.

Subsequent phases, which would begin after completion of Phase I, involve the installation of infrastructure improvements, including roads, sewer and water, storm water control, and miscellaneous utilities. Market demands would dictate completion of future phases. Given current trends, these improvements are not likely to begin for five or more years, which would result in a substantial portion of the former airport remaining undeveloped for a number of years. The City would continue to lease the undeveloped land for agricultural activities until the demand for additional industrial expansion occurs.

4. Descriptions of Projects Completed Prior to Land Release

Several projects were constructed prior to the completion of the land release and associated environmental process (Appendix A-6). Each project was consistent with the City's proposed plans for airport redevelopment and industrial park expansion (Appendix J). The projects completed and the reason for the timing of each project is provided below.

As a result of proceeding with development before completing the land release process, the FAA found the airport sponsor (the City of Willmar) to be in non-compliance of Grant Assurance 5 (Rights and Powers) and Grant Assurance 31 (Disposal of Land) in a letter dated October 9, 2009 (Appendix I). The newly constructed Willmar Municipal Airport will not be able to receive any funding from the FAA until the airport sponsor resolves all of the issues at the former airport and the new airport.

4.1. County State Aid Highway 47 (Renamed CSAH 5):

This project was constructed and managed solely by Kandiyohi County as CSAH 5 is a designated county road. The project began just south of State Highway 40 and crossed the former airport to US Trunk Highway 12. This project was listed on the state system as a necessary link to improve safety and mobility through this portion of the county. It also is a necessary link to make land available for sale in the industrial park.

The project included 0.18 miles of reconstruction of existing CSAH 47 and 0.91 miles of new four-lane construction across the former airport. The project consisted of grading, bituminous surfacing, curb and gutter work, and the installation of a water main, street lighting, and storm sewer. A storm water treatment pond integrated with the storm sewer to effectively treat storm water runoff from not only this project but also the existing industrial park was also included. A 7 foot by 14 foot box culvert was installed over County Ditch #10 (Hawk Creek), which is bridge #34J23.

The highway alignment is relatively straight and the grade of the highway is flat, as is the surrounding terrain. The adjacent land use throughout the highway section consists of mainly agricultural land with some industrial development.

The project was constructed in 2007/2008 at a cost of approximately \$3,644,000. The 2007-2009 State Transportation Improvement Program allocated Federal Highway funding for this project for fiscal years 2007 and 2008. This schedule is the reason the project was completed prior to the completion of the land release. Any delays to the schedule would have jeopardized funding for the project.

The Kandiyohi County Public Works department completed a Categorical Exclusion (CATEX) (Appendix F-2) for the project, which was approved by Mn/DOT and the Federal Highway Administration in April 2007. Wetland and right-of-way impacts were the only impacts identified in the CATEX. A Letter of Permission Permit from the US Army Corps of Engineer's and a Phase II National Pollutant Discharge Elimination System (NPDES) permit from the Minnesota Pollution Control Agency (MPCA) were the only required permits for the project.

4.2. Willmar Municipal Utilities Transmission Line

This project, constructed in 2007, consisted of replacing a transmission line removed from the new airport site. The line could not be replaced until after the former airport closed to avoid disruptions to service and to have access to the new location for the transmission line. The new airport operated with a displaced threshold until the lines were removed. Land area disturbed by the placement of the 14 poles is less than 200 square feet, as the holes were drilled as opposed to being excavated.

This project was included in the approved Environmental Assessment (EA) for the airport relocation project. The FAA approved the EA July 28, 1999 and issued a FONSI on August 26, 1999. This document is available upon request.

4.3. Willmar Avenue Extension:

This project included extending the existing Willmar Avenue across the former airport property to tie in to the recently expanded CSAH 5 (total project area was 8.20 acres). The project included removal of a portion of the former runway; installation of a water main, storm sewer, and curb and gutter; grading; and bituminous paving. The remaining 950 foot segment of the road that would connect the newly constructed road to the existing Willmar Avenue will be constructed after completion of the land release process. Runoff from the project is directed to the stormwater pond built for the CSAH 5 project.

This project was part of the overall plan to develop the former airport and is necessary to make land potentially available for sale in the new industrial park. It was constructed prior to the land release to provide access to the industrial park. Construction was halted after the City received notification that development of the former airport property was not permitted until completion of the land release.

The City did not conduct a formal environmental review for the Willmar Avenue project because the road follows the approximate alignment of the former runway and construction occurred only in areas previously disturbed for the construction of the former runway. There were no environmental impacts anticipated and all necessary permits were acquired before construction began, including a Minnesota Department of Health permit for the water main construction and a MPCA NPDES permit for stormwater controls during road construction.

4.4. Phase I Development at the Former Airfield

The City began Phase I development (as described in Section 3.2) in 2007 prior to the completion of the land release process. The City stopped construction once they received notification that development was not permitted until they completed the land release process. As of November 2009, three hangars were relocated to the new airport, four T-hangars were demolished, and portions of the runway/taxiway were removed. In addition, the CSAH 5 extension project with storm water drainage improvements was completed (previously discussed). The remaining portions of Phase I would be completed after the City obtains a land release from the FAA.

Demolition of the T-hangars and portions of the runway/taxiway was done shortly after the former airport closed. The T-hangars were removed because of structural safety issues with the buildings that posed a liability for the City. Portions of the runway/taxiway were removed after the City received numerous reports of unauthorized driving on the former runway and to prepare the site for the Willmar Avenue Extension project. No environmental analysis was conducted for these projects. All debris was either salvaged or transported to a demolition landfill for disposal.

4.5. Kandiyohi County Humane Society Building

Construction of the new 5500 square foot building for the Kandiyohi County Humane Society, completed in 2009, disturbed less than 0.75 acre of land. Proper construction safeguards were employed to prevent any environmental impacts. The building was constructed prior to the land release to meet tight Kandiyohi County timeframes for bidding, financing, and construction. There were no wetland or other environmental impacts associated with the project. Due to the small size of the project, no environmental permits were required. However, compliance with the City of Willmar's Stormwater Management Ordinance (Appendix K) was required and obtained.

4.6. Land Swap

As part of a mediated settlement for land acquisition at the new airport, the City swapped a 4.2 parcel from the former airport along Highway 40 for a 4.2 acre parcel that was needed for the runway protection zone at the new airport. The purpose of the swap was to provide a replacement site for buildings contained on the land needed for the new airport. The parcel does contain a portion of wetland W8 (Section 5.17.2). Nothing has been, or will be, done on the 4.2 acre former airport parcel until the land release is completed. No environmental review was completed for the land swap.

4.7. Lease of Hangar and Apron

The former terminal building and apron area are currently being leased to Bergh's Fabricating, Inc. for cold storage of steel and miscellaneous material/equipment. The City executed a preliminary agreement to sell the former terminal building/site to Bergh's Fabricating to facilitate the expansion of their business. On an interim basis, pending land release and resolution of the historical issues (Section 5.7), the Bergh's are renting the property and using it for storage. The property remains in essentially the same condition as it was when the airport relocated. There are no adverse environmental impacts resulting from the use of the site by Bergh's.

4.8. Repaving and Repair of Baseball Fields Parking Lot

The City will be repaving and repairing the parking lot for the baseball fields in the spring of 2010. The pavement is in bad condition and needs to be repaired before the City hosts an amateur baseball tournament this summer. The project will be funded with local funds and completed by City staff.

5. Affected Environment and Environmental Consequences

5.1. Air Quality

The Clean Air Act (CAA) established six criteria pollutants and required the Environmental Protection Agency to set National Ambient Air Quality Standards for these criteria pollutants. Projects located in nonattainment or maintenance areas may require a conformity determination. The City of Willmar is located in an attainment area; therefore, a conformity determination is not required.

In addition to the CAA, additional air analysis may be required to determine if a proposed project would negatively impact local air quality. Aircraft are no longer using the former airfield; therefore, this project would not have any direct or indirect aircraft emission increases associated with its implementation.

There may be temporary and permanent changes in emissions as development of the industrial park proceeds. The potential impacts associated with the shift in emissions are expected to be minimal due to industrial standards. However, it is not known at this time what type industry would eventually operate in the proposed industrial park area. Therefore, as development proceeds, potential impacts to air quality would be taken into consideration and if appropriate, monitoring and mitigation measures would be applied.

The No Action alternative would not result in any changes to local air quality.

5.2. Biotic Resources

Biotic resources are various types of flora (plants), fauna (fish, birds, mammals, etc) and habitat (rivers, lakes, forests, etc) found within a project area. Undeveloped areas on the former airfield include a mixture of farmland, wetlands, floodplains, and other natural areas. Hawk Creek and its associated riparian corridor bisect the northern portion of the property. Other habitat includes a stormwater pond located west of the recently constructed CSAH 5, formerly mowed turf, and landscaping.

Due to erratic flows downstream from the Foot Lake control structure (MN DNR ID MN00060 in Section 16, Township 119N, Range 35W) and the shallow depths of the creek, any fish habitat would be considered marginal or poor. Hawk Creek is not mapped as a Minnesota Department of Natural Resources (MN DNR) Designated Trout Stream.

The Rau Prairie Pothole Wildlife Management Area (WMA) (Appendix A-8) is located north of US Highway 12, about one mile northwest of the former airfield. This 100+ acre unit is being developed with native grass/forb nesting cover fields, wetland restorations, and woody cover development.

The former airfield has been subjected to extensive habitat conversion and fragmentation by past land uses, including modifications made for the operation of the former airport. Most of the remaining wetland habitat has been fragmented or degraded due to development and farming activities. The stormwater pond provides habitat for waterfowl, especially for various species of ducks and geese.

Development of the former airfield may result in the alteration of terrestrial and wetland wildlife habitats. This habitat loss is not anticipated to result in substantial impacts to the wildlife due to the previous disturbance at the site. Conversion of the former airfield to an industrial park would result in a shift in species from those common to mowed turf and agriculture to an assemblage commonly found in developed areas. Examples of wildlife expected in developed areas include various mammals (rodents, shrews, coyotes, and deer) and birds (geese, blackbirds, sparrows, swallows, wrens, and robins). Because the majority of the project area has been previously disturbed and used as an airport, the Proposed Action is not expected to have an impact on biotic resources or on the WMA. Any wildlife displaced during development of the industrial park would likely relocate to suitable nearby areas. The conversion would occur slowly over time, allowing wildlife a chance to adjust to the changes and relocate to areas surrounding the former airfield.

As development of the former airfield proceeds, the City plans to preserve as many of the wetlands as possible using setbacks and/or buffers. Any unavoidable impacts would be mitigated in accordance with applicable regulations (Section 5.17).

The No Action Alternative would not result in substantial impacts to wildlife populations.

5.3. Threatened and Endangered Species

Kandiyohi County does not have any Federally listed threatened or endangered species nor does the county have any habitat sufficient for any threatened or endangered species (according to the US Fish and Wildlife Service website). A review of the Minnesota Natural Heritage database identified two rare species or native plant communities within one mile of the former airfield that are not threatened or endangered (Appendix C). According to the Endangered Species Environmental Review Technician who conducted the review, the Proposed Action would not likely affect either of these species.

The No Action alternative would also have no impacts on the identified state species.

5.4. Coastal Resources

The former airport is not located within or near a coastal area. Therefore, neither the Proposed Action nor the No Action would result in impacts to coastal resources.

5.5. Compatible Land Use

The project area is located entirely within the corporate limits of the City of Willmar and was recently the municipal airport (Appendix A-2). The former airfield borders the existing Industrial Park (northeast), State Highway 40 (south and east), US Highway 12 (north) and 45th Street (west). There are other industrial land uses along US Highway 12 and State Highway 40. Agricultural crop production occupies a majority of the land to the west and south of the former airfield.

The City intends to rezone the former airfield from Government/Institution to Limited Industry prior to development, thus ensuring that subsequent industrial development

would be compatible with the City's Zoning Ordinance (Appendix A-9). In addition, the City's Comprehensive Plan (Appendix J) designated the former airfield as a future Industrial Park.

Development of the former airfield would be compatible with the new airport and includes:

- Maintaining the right for planes to fly over the former airfield
- Preventing the construction of any hazards to the new airport, including:
 - Structures that could impede safe operation of the new airport
 - Any development that could create a hazardous wildlife attractant

The development of the former airfield into an industrial park would be compatible with surrounding land uses and would not create any incompatible land uses.

The No Action alternative is compatible with current zoning.

5.6. Construction Impacts

Construction activities can create environmental impacts that are generally temporary in nature and subside at the completion of construction. Earth moving equipment will be active on the site during development of the former airport and can result in a temporary increase in noise and dust in the area. Using construction Best Management Practices (BMPs) will minimize the noise, erosion, and dust impacts, and include the following:

- Establishing truck routes and operating hours to limit noise and traffic disruptions
- Utilizing silt fencing and rocking of entrance roads to reduce dust and runoff
- Encouraging the use of clean diesel equipment, use of equipment that is properly maintained, and to shut off equipment when not in direct use
- Seeding and re-vegetating disturbed areas immediately following construction

Redevelopment of the former airfield into an industrial park would require the removal of the remaining runway and taxiway pavement. A majority of the concrete and bituminous material removed from the former airfield will be recycled. The Kandiyohi County Demolition Landfill would receive any material that cannot be recycled, which has adequate capacity to handle the material.

The No Action alternative includes routine maintenance of the former airfield and recently constructed roadways, which is expected to have minimal construction impacts.

5.7. Cultural Resources

Section 106 of the National Historic Preservation Act of 1966, as amended, requires consideration of the effects of Federal undertakings on properties listed on or eligible for inclusion on the National Register of Historic Places (NRHP). Compliance with Section 106 requires the lead Federal agency to consult with the State Historic Preservation Office (SHPO) to determine if there is a potential to adversely affect cultural resources.

5.7.1. Area of Potential Effect (APE)

The APE for the initial cultural resource investigation included 19.75 acres of the former airport. In consultation with the SHPO, the FAA expanded the APE to include the entire airport property and adjacent land areas (Appendix D-1).

5.7.2. Efforts to Identify Historic Properties

In December 2007, Bolton and Menk, Inc. completed a *Survey of Cultural Resources* (Appendix D-2) for the original APE. The FAA used this study to make a preliminary *No Historic Properties Affected* finding. The completion of two additional studies occurred after the FAA revised the APE in consultation with the SHPO.

Using soil data and previous site visits, Bolton and Menk completed the *Survey of Cultural Resources Addendum* in August 2008 (Appendix D-2). The survey did not uncover any archaeological or historical artifacts. Due to the soil type and previous disturbance, the possibility of locating any archaeological artifacts is minimal.

Gemini Research completed the *Determination of National Register Eligibility* report (Appendix D-3) in July 2008. Gemini Research utilized various sources and identified a portion of the former airfield that may be eligible for listing on the NRHP.

5.7.3. Description of Affected Historic Properties

The Gemini Research report identified the following features as potentially eligible for listing on the NRHP. All of the features retain sufficient physical integrity to convey the airport's historic design, functions, and significant associations. :

- Signal Beacon:
 - Constructed of bolted steel and supported by below ground footings
 - Built in 1939/1940 and relocated in 1946 to current location
 - Unaltered structure except for a new beacon light fixture installed in 1958
- Main Terminal Hangar:
 - Designed by Oscar Newstrom and built by a local crew of young men hired by the National Youth Administration (NYA) in 1941
 - Example of Streamline Moderne architectural popular in the U.S. around 1930
 - Flanked by two identical wings (12' x 78') that have slightly pitched shed roofs hidden by parapet walls on the north and south elevations, the main hangar consists of a central arch-roofed hangar block (100' x 100')
 - Constructed of smooth concrete block and reinforced by concrete block pilasters with slightly rounded corners
 - Items replaced: three windows, pedestrian doors, garage and hangar door
- Willmar Air Service Hangar:
 - Constructed in 1955 and located about 40' east of the main terminal.
 - Built of smooth concrete blocks painted white on the exterior
 - Original hangar door replaced in 1989
- Apron:
 - Built in 1949
 - Extends from eastern boundary westward to taxiway and T-hangar
 - Approximately seven aircraft tie-downs along eastern and southern sides

The main terminal hangar meets the eligibility requirements for National Register Criterion A due to the 1941 terminal's significance as an important NYA project. The main terminal hangar is one of few hangars of substantial size that remain in Minnesota from the 1930s and 1940s and is therefore an uncommon surviving example of society's first major investment in this property type.

The William Air Service hangar area meets National Register Criterion B, properties associated with the lives of persons significant in our past, because of strong associations with John L. Rice. John L. Rice was an individual who made significant contributions to the development of aviation in Minnesota.

5.7.4. Effects on Historic Properties

There is a potential for negative impacts to the historic features of the former airport if the FAA releases the property to the City for industrial development.

The No Action alternative would not impact the identified historic properties.

5.7.5. Summary of Consultation and Public Involvement

The following is a summary of all consultation and public involvement (Appendix D-6):

- March 3, 2008 – SHPO non-concurrence with the APE and results of initial building evaluation report.
- September 10, 2008 – SHPO concurrence with evaluation and historic boundary completed by Gemini Research. Included recommendation for the inclusion of a preservation easement on the historic property to protect the property.
- September 30, 2008 - The FAA refined the historic boundary and encouraged the City to consider adding a preservation easement to the property.
- October 7, 2008 - The City's decision against the inclusion of a preservation easement on the property.
- October 17, 2008 – The FAA issuance of an Adverse Effect Finding and notification to the SHPO and the Advisory Council on Historic Preservation (ACHP) of the finding.
- October 17, 2008 – The FAA invitation to the following agencies to become consulting parties. All of the agencies declined to participate as consulting parties.
 - Commemorative Air Force Minnesota Wing
 - Kandiyohi County Historian
 - Minnesota Air National Guard Foundation
 - Minnesota Transportation Museum
 - Preservation Alliance of Minnesota (did submit comments for consideration)
- October 23, 2008 – A public notice, advertised in the West Central Tribune, providing the public with thirty days to comment on the potential adverse affect. One comment received from Mary Jane Rice encouraged protection of the historical site.
- October 29, 2008 – The ACHP decision not to participate in resolving the adverse effects associated with the Proposed Action.

- October 30, 2008 – SHPO notification of concerns with the refined boundary and the City’s determination not to pursue the preservation easement.
- November 19, 2008 – Meeting between the SHPO, the City, and the FAA to discuss the Section 106 process.

5.7.6. Current Status

Following communications between the FAA and the City, a preservation easement for the terminal building/area was determined to be the best way to ensure adequate protection of the historical resources at the former airport. By including the preservation easement on the historical portions of the former airfield, the SHPO indicated that a No Adverse Effect finding would be appropriate.

The Preservation Alliance of Minnesota has expressed an interest in becoming the potential holder of the preservation easement. The FAA and the City are working with the Preservation Alliance and the SHPO to develop and implement the easement. The FAA will issue a No Adverse Effect finding after significant progress on the easement has been made and before approving the final EA for the Proposed Action.

5.8. Department of Transportation Section 4(f)

Section 4(f) legislation, established under the Department of Transportation Act of 1966 (now codified at 49 USC 303), provides protection for publicly owned parks, recreation areas, or wildlife/waterfowl refuges and historic sites of national, state, or local significance.

The portion of the former airfield that was found to be eligible for listing on the National Register of Historic Places qualifies as a Section 4(f) property. The eligible property encompasses about 13 acres of the former airfield (Appendix D-3). When the FAA releases the property to the City, the FAA would no longer have control over the property nor would they have control over what would happen to the historic features of the airfield. For these reasons, the release of the property could result in a physical use of the historic features of the former airfield. However, including a preservation easement on the historic portions of the former airport is a prudent and feasible alternative that would avoid any impacts to the Section 4(f) resource. It would also allow a Section 106 finding of No Adverse Effect. As a result, a *De minimis* Section 4(f) finding is appropriate for the Proposed Action.

The Rau Prairie Pothole Wildlife Management Area, located approximately one mile northwest of the former airfield (Appendix A-8), is another Section 4(f) property in the project area. However, the land release and future development of the former airfield would not have any impact on the Wildlife Management Area.

The No Action alternative would not have any impacts on any Section 4(f) properties.

5.9. Energy

The project area would be served by electric (Willmar Municipal Utilities) and gas (Center Point Energy) utilities. The overall energy consumption created because of the Proposed Action would depend upon the types of businesses that locate to the Industrial Park and the City would address any concerns during the sale of the property. Due to increases in energy efficient industry standards, the change energy consumption should have minimal impacts.

The No Action alternative would not have any impacts on energy supply.

5.10. Farmlands

The Federal Farmland Protection and Policy Act and the Minnesota Agricultural Land Preservation and Conservation Policy Act ensure consideration of impacts to agricultural lands and operations during the decision-making process. These laws also intended to minimize, to the extent reasonable, actions that result in unnecessary and irreversible conversion of farmland to non-agricultural purposes.

The City of Willmar currently has approximately 800 acres of land being actively farmed, with 300 of these acres occurring on the former airfield (approximately 37% of the total farmland available). Though the Proposed Action would not require the acquisition of any property and therefore no conversion of soils designated as prime farmland, land that is currently farmed would no longer be available for farming as development of the industrial park continues. This would result in a loss of 300 acres of farming. To try to minimize the impact of this loss, the City would continue to lease this land for farming activities until it is needed for development and they would try to refrain from using this land until no other possibilities for development remain.

The No Action alternative would not require the conversion of farmland soils and would not result in any loss of farming activities.

5.11. Floodplains

The former airfield includes 33 acres of land that is within the Federal Emergency Management Agency (FEMA) delineated 100 year floodplain (Appendix A-3). The floodplain extends along County Ditch 10.

Currently, the City does not participate in the FEMA National Flood Insurance Program and has not adopted a municipal floodplain ordinance. However, the City will not allow development within the identified floodplain. Not only would all future development be outside the identified floodplain, a 100-foot vegetative buffer would also be maintained between the floodplain and development. This buffer area could serve as valuable green space and could be the site for future trail development. Revision of the Willmar Zoning Ordinance in 2010-2011 would include floodplain protection language and map designation to ensure no building occurs within the floodplain.

Both the Proposed Action and the No Action alternatives would not affect the floodplain.

5.12. Hazardous Materials and Solid Waste

The Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation, and Liability Act, as well as applicable state laws, regulate management of hazardous materials. These laws apply to wastes generated by construction and must be considered when developing projects.

5.12.1. Hazardous Materials

There were two underground fuel storage tanks within the project area that were once associated with the operation of the airport. These tanks have been properly emptied and removed, and pose no threat to the environment. There are no threats from hazardous materials for the Proposed Action or the No Action alternatives. A summary of UST removal and closure is included in Appendix H.

A Phase I Environmental Due Diligence Audit (EDDA) identified several possible areas of concern on the site (Appendix G). These concerns were related to confirmed and unconfirmed discharges of materials during the operation of the former airport, occurring over a period of years. All confirmed discharges were remediated at the time of the discharge, with no identified environmental impact. The interior of the remaining buildings was not included in the Phase I EDDA report.

The EDDA did not reveal evidence of recognized environmental conditions in connection with the Site and nearby properties with the following exceptions:

- a. The storage of petroleum projects at the airport, public works garage, and the water filtration plant is a recognized environmental condition.
- b. An open LUST investigation file exists for the public works garage; indicating that contaminated soil and/or ground water may be present.
- c. A closed LUST site exists at the airport.
- d. A leaky hydraulic lift station (now abandoned/filled in) at the public works garage may have impacted soil and ground water in the vicinity of the old lift.
- e. Unmonitored loading of agricultural chemicals into aerial application equipment on the airport property may have impacted soils in the area where planes were loaded.
- f. The presence of demolition debris at the north end of the Site may have impacted soil and/or ground water at the Site.
- g. A garbage pit/disposal site exists on the Site in the vicinity of an old farm-site on the west end of the property. Materials disposed of in this pit may have impacted soil and/or ground water at the Site.
- h. Several potential off-site sources of contamination are located in a hydraulically up-gradient position from the Site. These include an open LUST site, a wood treatment facility, and a CERCLIS site.
- i. A railroad right-of-way runs near the Site. Railroad rights-of-way have typically been found to be contaminated with petroleum products.

Only three of the identified concerns (e, f, and g.) are within the former airport and could possibly affect future redevelopment of the site. Prior to any land disturbing activities in the areas noted in the Phase I report, a Phase II study would be completed. Additionally, the building areas would be tested for asbestos and lead-based paint before any remodeling, construction or demolition. If any hazardous materials are identified, they would be disposed of in accordance with the applicable Federal, state, and local laws.

The No Action alternative would have no hazardous waste impacts because no development or land disturbance would occur.

5.12.2. Solid Waste

West Central Sanitation and Willmar City Sanitation provide solid waste disposal service to the project area. The additional solid waste generated because of the Proposed Action would have no impact on these service providers or the capacity of the Kandiyohi County Sanitary Landfill. Both the local waste haulers and the landfill have the capacity to accommodate any solid waste generated as a result of the Proposed Action and future development (determined through conversations with local waste haulers and management of the landfill).

The No Action alternative would have no impact to the local solid waste capabilities.

5.13. Light Emissions and Visual Impacts

A majority of the lighting associated with the former airport has been removed, including the high intensity runway lights. All that remains is the beacon (which is turned off) and the lighting associated with the former terminal building. The change of the property to an industrial park would result in new street lights being added to the new roadways and lighting associated with the new commercial/industrial businesses. The closest residential neighborhood is about one mile away. There is a number of existing large scale industrial and public recreation areas that separate the project area from the residential area. Due to the close location of the former airfield to the established Industrial Park and the distance from residential neighborhoods, the Proposed Action should have minimal light and visual impacts.

The No Action alternative would not have any light impacts but may create a visual impact as the land continues to deteriorate.

5.14. Noise

Relocation of the airport removed aircraft noise from the former airport. Development of the former airfield into an industrial park has the potential to create minor noise impacts, depending on the type of businesses that move into the area. The City will address any potential noise impacts during property sales. Future buyers will be informed about the existing noise standards that are part of the City's Zoning Ordinance.

The No Action alternative would not result in any change in noise levels.

5.15. Socioeconomic Impacts

Socioeconomic impacts include impacts associated with the relocation of residential or business property, alterations in surface transportation patterns, or the division or disruption of established communities.

The Proposed Action would not affect the demographic character of the general area, as it would not require the relocation of any residence or business. The redevelopment of the former airfield includes additional roadways, which would increase efficiency for the traveling public. Businesses that locate to the project area would create additional employment opportunities and further expand the City's tax base.

The No Action alternative would not have any socioeconomic impacts but may reduce the industrial growth of the City.

5.15.1. Environmental Justice

Executive Order 12898 and DOT Order 5610.2 requires each federal agency, to the greatest extent practicable and permitted by law, to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low income populations.

The area surrounding the former airport consists of agricultural, industrial development, and residential areas. According the 2000 Census, the residential areas contain EJ populations (both low income and minority populations). These residential areas are located north of US 12 and east of State Highway 40, which are over a mile from the project area. The existing industrial park has minimal environmental impacts, which are representative of future site conditions. The proposed development would not require displacement nor would it result in incompatible land uses. Based on these factors, no disproportional impacts are anticipated for these residential areas for both the proposed action and the no action alternative.

5.15.2. Secondary Impacts

Secondary or indirect impacts involve shifts in population, changes in economic climate, or shifts in levels of public service demand and are usually associated with major development projects, major roadway alignments, and other similar projects.

The Proposed Action is not anticipated to create any excess demand for public services. It does have the potential to bring new businesses and jobs to the City, which would be a benefit for the City. Existing public services are adequate to deal with the anticipated increase in population and business activity.

The No Action alternative would not create any secondary impacts but would hamper the growth of the City by limiting future industrial development.

5.16. Water Quality

The former airport is located in the Hawk Creek Watershed, an area that drains approximately 624,424 acres of land in Renville, Chippewa, and Kandiyohi counties. Surface water resources within the watershed and near the former airfield include Foot Lake (located north of US 12), Willmar Lake (located north-east of Foot Lake), a stormwater pond (located west of the new CSAH 5), Hawk Creek (bisects the north-eastern part of the former airfield), and various tributaries of Hawk Creek including County Ditch 10 (runs parallel along on the west side of CSAH 5).

Hawk Creek begins in Eagle Lake north of Willmar, bisects the former airfield, and flows 65 miles southwesterly to the Minnesota River. Thirty-six miles of Hawk Creek were channelized in the 1960's to facilitate agricultural drainage. Hawk Creek is a Class 7 Water (Limited Resource Value Water) according to the MPCA, which indicates protection for aesthetic qualities, secondary body contact use and groundwater for use as a potable water supply. However, it does not provide enough water or suitable habitat for aquatic life and aquatic recreation. Agricultural comprises over 87% of the land area of the watershed.

The Hawk Creek Watershed currently has three water bodies identified on the Minnesota Pollution Control Agency's 303(d) list of impaired waters (referred to as the TMDL list, which stands for Total Maximum Daily Load, an assessment of a water body's ability to sustain itself from pollution). They are Hawk Creek (for fecal coliform and turbidity), Beaver Creek (for fecal coliform and turbidity), and Long Lake (for excessive nutrients). By June 30, 2011, an Environmental Protection Agency-approved TMDL assessment report and a MPCA TMDL implementation plan should be drafted.

The MPCA designated the City as a municipal separate storm sewer system (MS4). In accordance with this designation, the City obtained a General NPDES Permit, which requires the implementation of Best Management Practices (BMPs) to control construction site erosion. The Permit also requires the development of a Stormwater Pollution Prevention Plan (SPPP), which identifies the types of BMPs that minimize sediment and pollutant discharges, along with specific inspection and maintenance procedures. The following BMPs would be used to maintain and improve water quality in the project area. Consideration would be given to the new airport to ensure that any methods used would not create a wildlife hazard for the new airport.

- Rock or Blind Intakes – This design involves digging a trench, placing drainage tile in the bottom, and filling the trench with small rock. The advantage of this system is that it can farmable.
- Pattern Tile with Open Intake Removed – This design involves the installation of subsurface drainage pipes in a very tight pattern or coiled in a small area in the middle of a wet spot.
- Hickenbottom Intakes – This technique involves replacing an open intake with a perforated riser.

- Buffer Strips – Buffers are areas or strips of vegetation, designed to intercept pollutants. Properly placed buffers on the landscape can effectively minimize movement of soil, nutrients and chemicals from farm fields; they can also enhance wildlife habitats.
- Ditch bank Side Inlets – A structure used to control the grade and head cutting primarily ditch banks.
- Sediment Basins – A basin constructed to collect and store debris or sediment.

A storm sewer system collects stormwater from the existing and platted industrial park and delivers it to a four-acre stormwater pond for treatment (Appendix M). Further expansion of the industrial park would include additional stormwater ponds as needed. All additional stormwater ponds would be designed in a way to prevent creating a wildlife hazard for the new airport. Potential pollutants that could be contained in the runoff include sediment, road salts, oils, and other trace chemicals commonly associated with roads and construction sites. Controlled discharge of the treated effluent from the new storm water pond into County Ditch 10, which is a tributary of Hawk Creek, would not impact the quality of the receiving waters.

The City's public water system would provide service to the new industrial park by installing a combined 9,400 feet of water and sanitary sewer main during Phase I of development (Section 3.2). This system consists of 16 wells, two water treatment plants, two pumping stations, and four storage facilities. In 2005, the average daily demand was 4.3 million gallons per day; the peak daily demand was 6.8 million gallons per day. These figures are well under the capacity of the system, which is 7.9 million gallons per day. The City would ensure proposed development is compatible with existing infrastructure capabilities through its adopted land use controls.

The City's Wastewater Treatment Facility would handle wastewater generated from future industrial development. The current facility discharges treated effluent into Hawk Creek. While the current facility has the capacity to treat wastewater from the project area, the City is finalizing plans to construct a new facility that would provide additional capacity for growth and improved treatment technology. The new plant is located four miles WSW of the City of Willmar and would be operational by late 2010.

There are no wells within the former airport. However, there is a major municipal well field located just east of the former airport. The aquifer serving the well field lies beneath the former airport. This aquifer is isolated from surface contamination due to a thick layer of clayey till (Appendix L) and would not be impacted by the Proposed Action.

Impacts to surface water resources within the former airport, including County Ditch 10 and Hawk Creek, would be minimal. Management of stormwater would be in accordance with the City's General NPDES permit and SPPP. The Proposed Action would not significantly alter the quantity of site runoff and water quality should improve due to stormwater mitigation efforts that would be included with any future development.

The No Action alternative would have minimal impacts on water quality. Stormwater runoff from the site would continue to be collected and delivered to the four acre stormwater pond and eventually discharged into Hawk Creek.

5.17. Wetlands

Executive Order 11990, DOT Order 5660.1A, and the Clean Water Act address activities in wetlands. These laws mandate the “no net loss” of wetland functions and require projects to avoid, minimize, and mitigate any potential wetland impacts. Wetlands in the project area are regulated by several agencies including the US Army Corps of Engineers (USACE) at the Federal level; the Minnesota Board of Water and Soil Resources (BWSR), MN DNR, and MPCA at the state level; and Kandiyohi County Soil and Water Conservation District (SWCD) at the local level. The Kandiyohi County SWCD is responsible for the administration of the Minnesota Wetland Conservation Act of 1991.

Wetlands in the project area were mapped using on-site wetland delineation following the USACE’s 1987 Wetland Delineation Manual (*Identifying Wetlands of the United States*) (Appendix E). Seventeen (17) wetland areas, a total of 26.5 acres, were identified and are summarized in Table 1. Only two wetlands (W2 and W3) provide high quality and function. The remaining wetlands provide low to moderate quality and function.

Table 1.

Wetland	Type	Size (acres)	Function	Quality	Description
W1	6	1.96	Mod	Mod	Ditch; Willow Swamp; Mixed native & invasive species
W2	2	0.82	High	High	Isolated pothole; Mainly native species
W3	3 / 4	1.65	High	High	Isolated pothole; Mainly native species
W4	2 / 6	2.47	Mod	Mod	Isolated pothole; Mainly native species
W5	3	0.82	Mod	Mod	Isolated pothole; Mixed native & invasive species
W6	2	2.58	Low	Low	Isolated pothole; Farmed & tiled
W7	2	0.46	Mod	Low	Isolated pothole; Row crops
W8	4	6.48	Mod	Mod	Mixed native & invasive species
W9	2	2.68	Mod	Low	Isolated wetland; Row crops
W10	1 / 2	1.44	Mod	Low	Ditch; Sedge Meadow
W11	2	0.62	Mod	Low	Isolated pothole; Mainly native species
W12	2 / 3	1.03	Low	Low	Drained by storm sewer; Mixed species
W13	2 / 3	0.93	Low	Low	Drained by storm sewer; Mixed species
W14	2	0.41	Low	Low	Road ditch; Mainly native species
W15	2 / 3	0.64	Mod	Low	Isolated pothole; Mainly native species
W16	3 / 4	0.36	Mod	Low	Ditch; Mixed native & invasive species
W17	3	1.13	Low	Low	Ditch; Mixed native & invasive species

5.17.1. CSAH 5 Project

This project impacted two wetlands (W12 and W13); however, there was no practicable alternative to avoiding the wetland impact (Appendix F-2). To minimize the wetland impact, the overall profile of the new roadway was designed as low as possible to keep fill slopes to minimum. The affected wetlands were mitigated through the purchase of credit from the Board of Soil and Water Resources State Wetland Bank. A Letter of Permission was obtained from the USACE for the project.

5.17.2. Kvam Land Swap

The land given to Kvam as part of the land acquisition settlement for the new airport (see Section 4.6) included a portion (less than 0.5 acre) of wetland W8. Any impacts to the wetlands on this Parcel by Mr. Kvam would be subject to all necessary permits and regulations applicable at the time. Impacts to this wetland, to the City's knowledge, have not occurred.

5.17.3. Proposed Action

The City intends to plat the land in a way that maximizes development while avoiding, to the fullest extent possible, wetland impacts. Minimization of future wetland impacts would occur by using setbacks and vegetative buffers, as defined in the Wetland Conservation Act of Minnesota.

If wetland impacts are identified during development of the former airport, the City would mitigate any unavoidable impacts in accordance with the Wetland Conservation Act and other applicable regulations, including the Clean Water Act and stormwater management plans. All required permits would be acquired and all necessary coordination would be completed before any development occurs.

As redevelopment planning continues, the City will consider permanent protection for the two high quality wetlands through a wetland bank program or by establishing wetland preservation areas.

The No Action alternative would not have any wetland impacts.

5.18. Wild and Scenic Rivers

Wild and Scenic Rivers are designated as part of the National Wild and Scenic River Program by the U.S. Department of Interior to protect the most beautiful and unspoiled rivers in the nation. There are no designated National Wild and Scenic Rivers within the project area. For this reason, neither the Proposed Action nor the No Action alternative would have any impacts on Wild and Scenic Rivers.

6. Cumulative Impacts

Cumulative impacts result from the incremental impact of an action when added to other past, present, and reasonable foreseeable future actions.

Prior to any development at the former airfield and surrounding areas, land use consisted of agricultural crop production and prairie/wetlands. Development of the former airfield started in 1934, while construction of the industrial park began in the 1960s. Current development in the area includes transportation improvements (roads, rail, and airport), residential development, commercial/industrial development, and open space/recreation development. The 2009 Willmar Comprehensive Plan (Appendix J) does not anticipate much development in the area, besides redevelopment of the former airfield, due to a desire to protect valuable agricultural lands.

Previous and future development has included both wetland and agricultural impacts. Historically, approximately 98% of the original wetlands in the Hawk Creek watershed have been artificially drained. The construction of the CSAH 5 impacted wetlands and the development of the former airfield has the potential to impact wetlands.

The impacts of CSAH 5 were mitigated through the purchase of wetland bank credits. Future development that results in unavoidable wetland impacts would be mitigated according to Federal, state, and local regulations. There have been wetland restoration projects within the Hawk Creek watershed and Kandiyohi County to replace wetlands. In 2009, 19 wetlands on 12 tracts of land throughout the County were restored. In addition, the Hawk Creek Watershed Project has begun offering incentives to encourage additional restoration. These actions plus the required wetland mitigation from any future actions at the former airport site will result in no cumulative wetland impacts for the Hawk Creek watershed and Kandiyohi County.

Even though cultivated agricultural land is the largest land use within Kandiyohi County and the Hawk Creek watershed (over 87% of the land area of the watershed is used for agricultural purposes), the number of acres of farmland is slowly decreasing due to growth and urban sprawl. The construction of the new Willmar Municipal Airport resulted in a loss of 765 acres of farmland. The CSAH 5 project converted approximately 11 acres of farmland. The development of the former airfield has the potential to remove another 300 acres of farmland. The City recognizes that this loss of farmland could be an impact and has limited additional development to protect the remaining agricultural lands.

The Proposed Action combined with the previously mentioned development would have a negligible cumulative environmental impact. No single impact, even when considered with past, present, and future actions, represents a substantial impact that cannot be mitigated. Therefore, the Proposed Action would not result in any significant cumulative impact.

The No Action alternative has little potential to create any new cumulative environmental impacts due to the limited impacts associated with the alternative.

7. Mitigation/Future Action

The following mitigation measures are included with the Proposed Action:

- Floodplain Management – no development will occur within the designated floodplain. 100' buffers of native vegetation will be maintained (see 5.11)
- Wetlands – the City would either avoid or minimize wetland impacts, to the fullest extent possible, by using setbacks and vegetative buffers. Mitigation would occur for any unavoidable impacts in accordance with the Wetland Conservation Act and other applicable regulations. 100' buffers of native vegetation will be maintained for protected wetlands (see 5.17)
- Soil Suitability – all imported fill will be certified as free of contaminants that could potentially degrade the quality of ground and surface water resources.
- Noise Abatement – noise associated with demolition, grading, and construction activities will be abated using mufflers and proper maintenance of equipment, per manufacturer specifications.
- Zoning – the City will rezone the project area from Government/Institutional to Limited Industry and/or Agriculture, ensuring that subsequent development will be compatible with the City's Zoning Ordinance and Comprehensive Land Use Plan.
- Historic Preservation – a preservation easement will be included for the historic features of the former airfield to provide adequate protection of these features.
- Hazardous Waste – a Phase II EDDA will be completed before any land sale

8. Coordination

The City consulted the following agencies during the environmental process:

Name	Title	Organization
Douglas Miller	Soil Scientist	Natural Resources Conservation Service
James Kulset	Chief of Police	City of Willmar
Lisa Joyal	Endangered Species Env Review Technician	Minnesota Department of Natural Resources
Marv Calvin	Fire Chief	City of Willmar
Tom Cinadr	Survey & Info Management Coordinator	Minnesota State Historic Preservation

The following agencies received a copy of the draft EA:

Local Agencies

- Kandiyohi County Soil and Water Conservation District
- Kandiyohi County Environmental Services
- Prairie Country Resource Conservation and Development Council
- Hawk Creek Watershed Project

State Agencies:

- Board of Water and Soil Resources
- Department of Agriculture
- Department of Commerce
- Department of Health
- Department of Natural Resources
- Department of Transportation Office of Aeronautics
- Department of Transportation Office of Environmental Services
- Environmental Quality Board
- Pollution Control Agency (Environmental Review and Impaired Waters)
- State Historical Preservation Office

Federal Agencies:

- Federal Aviation Administration – Minneapolis Airports District Office
- Natural Resources Conservation Service
- US Army Corps of Engineers
- USDA (APHIS Wildlife Services)
- US Environmental Protection Agency
- US Fish and Wildlife Services