

# 5 Environmental Overview

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## 5.1 INTRODUCTION

This chapter presents environmental factors present at Felts Field that could affect the implementation of development projects identified in this master plan. This chapter focuses on environmental conditions and requirements that could influence the selection of alternatives and/or the timing and cost for implementing development projects. For example, several federal laws or orders require that in order for the FAA or federal environmental regulatory agencies to approve or provide permits for a project that affects certain environmental resources, it must be clearly demonstrated that there are no other feasible and practical alternatives that avoid or minimize impacts to those resources. Wetlands, floodplains, groundwater, Section 4(f) resources, and threatened and endangered species fall in this category. Some environmental conditions could affect the timing and/or cost for implementing projects because they require permits, approvals, or consultations with federal or state agencies prior to project implementation. These include wetlands, groundwater, protected species, and cultural resources. Environmental conditions that may require time-consuming or costly mitigation of impacts are also addressed herein; these include the presence of hazardous materials that must be remediated or the acquisition of properties that require relocating the existing residents or businesses. While the FAA will determine the level of NEPA documentation required for each project, this section assesses the likely appropriate level based on the existing information. Without duplicating the information provided in the Chapter 1, “Inventory” and focusing on the implementation of proposed development projects, this chapter addresses these resources.

**Table 5-1** summarizes whether the proposed projects would affect the resources addressed in this chapter. The section after the table discusses the aquifer resource that is beneath the entire airport and would be relevant for all development projects, followed by discussions of the individual projects and the additional resources and regulatory requirements that would need to be addressed to implement each project.

**Table 5-1. Likelihood of Master Plan Development Projects Affecting Resources**

REGULATED RESOURCE	RW 22R EXTENSION	NORTH HANGAR AREA	T-HANGAR EAST INFIELD DEVELOPMENT/ ATCT RELOCATION	HANGAR DEVELOPMENT (WITH LAND ACQUISITION)	FIREFIGHTING ACCESS
Wetlands	None	None	None	None	None
Protected Species	None	None	None	None	None
Spokane River Setback <sup>1</sup>	None	Low	None	None	None
Hazardous Materials	Low <sup>2</sup>	Low	Low	Low <sup>2</sup>	Low
Cultural Resources <sup>3</sup>	Low	Low	Low	Low	Low
Groundwater <sup>4</sup>	Low	Low	Low	Low	Low
USDOT Section 4(f)	None	None	Low	None	None
Easements/Acquisitions/ Relocations	High: 17 residential, 11 business	No	No	High: 36 residential	No
Noise Compatible Land Use	None <sup>5</sup>	None	None	None	None
Environmental Justice Populations	Moderate <sup>6</sup>	None	None	Moderate <sup>5</sup>	None

- 1 N. Hangar area is within the 200-foot river setback area, but roads are allowed with permission and hangars would be no taller than 35 feet.
- 2 While no hazardous materials were identified, environmental due diligence audits are required by FAA for property acquisitions.
- 3 The development of T-Hangars in the East Infield could require assessment of effects to the nearby existing historic district. Acquisitions could require assessment of some existing structures before demolition, and undisturbed areas could require archaeological assessment.
- 4 The airport is located over a sole source aquifer, and while it is unlikely that development projects would affect groundwater, all projects would need to demonstrate compliance with local, state, and federal protection laws and regulations.
- 5 The runway extension would result in an increased 65dB DNL noise contour; however, the 2037 noise contour generated based on the runway extension and projected aircraft operations does not shift the noise contour off airport property.
- 6 Environmental justice populations could be present in acquisition areas. See discussion below.

## 5.2 SPOKANE-RATHDRUM AQUIFER

Like much of the surrounding area, Felts Field is located over the Spokane-Rathdrum Aquifer Protection Area (APA) and the Critical Aquifer Recharge Area (CARA) of the Spokane River Watershed. Thus, all projects in the master plan would be subject to local, state, and federal regulations to protect these resources. The U.S. EPA has designated the aquifer as a sole source aquifer (SSA). The EPA’s SSA program requires that proposed projects that are in the aquifer’s review area and receive federal funding be evaluated to ensure that the proposed projects would not contaminate the SSA. The review area includes the area overlying the SSA. It may also include the source areas of streams that flow into the SSA’s recharge zone. All projects on the airport would be subject to SSA program review. This review is typically conducted concurrent with and reported in the NEPA documentation. APAs are defined in Washington State Code RCW 36.36, which provides a mechanism for creating aquifer protection areas to finance the protection, preservation, and rehabilitation of groundwater, and to impose special assessments to finance facilities for such purposes. Since the airport uses the municipal water supply, it is not expected that development projects would be subject to the APA. Spokane County’s land use regulations are designed to protect critical areas,

including the CARA, from improper development through the Critical Areas Ordinance (Chapter 11.20). The ordinance regulates activities and uses in wetlands and buffers, fish and wildlife habitats and geo-hazard areas; none of these areas are present on the airport.

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### 5.3 SPOKANE RIVER SETBACK

Biologic resources would be found primarily within the riparian areas adjacent to the Spokane River. The City of Spokane Municipal Code 17E.020.050 protects these areas for regulated fish and wildlife habitat conservation areas or associated buffers. Individual projects subject to building permits within Spokane would be subject to city codes and could require a Habitat Management Plan within the designated setbacks unless waived by the planning director. The City of Spokane has set the following objectives:

- Ensure no further degradation of the shoreline.
- Set buffer distances to achieve a “no net loss” of shoreline ecological functions.
- Set buffer distances, where possible, to increase the potential for future shoreline restoration.
- Critical areas regulations layers and buffers provided a strong basis for the shoreline buffer determination.

The shoreline setback is based on multiple factors determined by the City of Spokane Planning Department. All development landside of the setback will need to be coordinated with the City of Spokane Planning Department for compliance with shoreline regulations.

Development located within 200 feet of the river’s edge is designated as the Urban Conservancy Shoreline Environment and has a shoreline buffer of 150 feet with a construction setback of 15 feet from the buffer edge. Typically, no structures are allowed within the shoreline buffer or the structure setback, in order to protect the shoreline buffer during construction activities. Structures located 100 to 200 feet from the shoreline are allowed a maximum height of 35 feet. Height increases are not allowed within the shoreline jurisdiction through any other City of Spokane regulation that could allow for an increase to the allowed structure height. Facades exceeding 50 feet and visible from the shoreline will provide articulation. This could be accomplished through the use of offsets, recesses, staggered walls, stepped walls, pitched or stepped rooflines, overhangs, and other elements of the building’s mass. Simply changing materials or color would not be sufficient to accomplish this.

However, some features would be allowed within the shoreline buffer as long as they minimize adverse impacts on the shoreline ecological functions, per Section 17E.060.720 Shoreline Buffers. Streets necessary to access approved water-dependent development and emergency services, such as the seaplane dock, would be allowed to encroach into the shoreline buffer. SMC 17C.190.530 defines airports as Essential Public Facilities. Per SMC 17E.060.720, Essential Public Facilities may encroach into the buffer when the planning director determines that no feasible alternative location will work, it cannot meet the dimensional standards, and the facility is designed to meet specific dimensional standards. While sections of the code appear to offer some relief to the setbacks, anything within the shoreline jurisdiction would still be required to meet the shoreline permitting and design requirements.

This master plan considered the 200-foot setback and clearance while developing the master plan alternatives. However, some facilities would be allowed within the shoreline buffer as long as they minimize adverse impacts on the shoreline ecological functions, per Section 17E.060.720 Shoreline Buffers. Assuming a 15-foot deep parking area, vehicle parking could occur beyond the 165 feet the shoreline but would require a permit. Structures (such as hangars) located 100 to 200 feet from the shoreline would be allowed a maximum height of 35 feet.

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## 5.4 PROJECTS

### 5.4.1 *North Hangar Area, Air Traffic Control Tower Site 1, and Firefighting Access Road/Gate*

As shown in **Table 5-1**, development of these projects is expected to have no or low likelihood to affect resources. These areas are undeveloped and prior to development, they may need to be evaluated for archaeological sensitivity under Section 106 of the National Historic Preservation Act. In addition, while there is no designated critical habitat for federal- or state-protected species on Felts Field or the areas designated for acquisition, the U.S. Fish and Wildlife Service (USFWS) and Washington Department of Fish and Wildlife's update their databases regularly, and these should be consulted as part of the implementation of these projects. In addition, development on these sites would have to demonstrate compliance with local, state, and federal laws and requirements for protecting the Spokane-Rathdrum APA and the CARA of the Spokane River watershed. The lack of resources in the vicinity of these projects indicates that these projects could comply with NEPA through the completion of Categorical Exclusions.

### 5.4.2 *Runway 22R Extension*

Extension of Runway 22R would occur entirely on the airport; however, property would need to be acquired and cleared for Runway Protection Zones associated with the extended runway. These acquisitions are discussed in more detail below. The acquisitions and relocation costs of the current residents and businesses are included in Chapter 7, "Facility Implementation Plan" cost estimates.

Areas of potential disturbance in the undeveloped area proposed for the runway extension would likely need to be evaluated for archaeological sensitivity and protected species databases should be checked closer to the time the project is to be implemented. Although data presented in Chapter 1, "Inventory" indicates no hazardous materials are in the development area, FAA will require environmental due diligence audits to confirm the absence of hazardous materials on properties to be acquired. Orchard Avenue Park is a community park and baseball field on the corner of E. Bridgeport Avenue and N. Park Road that would fall in the RPZ of extended Runway 22R and would likely need to be relocated as part of this project. The park is on airport property and is managed by the City of Spokane through a concurrent use agreement with the FAA; therefore, the parcel is primarily a transportation use and is not protected by Section 4(f). Implementation of this project would have to demonstrate compliance with local, state, and federal laws and requirements for protecting the Spokane-Rathdrum APA and the CARA of the Spokane River Watershed.

The runway extension would result in a change in the number or type of aircraft operations and as a result would change the existing 65dB DNL noise contour. A significant impact could occur if the contour extends beyond the current airport property to the north over residential areas; however, the 2037 noise contour based on the runway extension does not extend beyond the existing airport property.

Three locations off the airport property would require property acquisitions in order to complete the Runway 22R extension and associated facilities. There are 17 parcels that are residential that will need to be acquired and 11 parcels that are either classified as “Light Industrial” or “General Commercial”. Of these 11 parcels, 4 would need to be fully acquired, 4 would need to be partially acquired, and 3 would need only a small portion of the property that would not require an acquisition that would affect the parcel. When the acquisition of real property or displacement of persons is involved, the following federal regulations for federal projects and projects that involve federal funds must be met: 49 CFR Part 24, “Implementing the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970,” as amended. A more detailed socioeconomic impact review would need to be conducted in the areas surrounding the acquisitions in order to meet the requirements of the Uniform Relocation Act.

Environmental Justice would need to be addressed in the areas of acquisitions to determine if there are disproportionate effects on low-income or minority populations, per Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.” In addition, if such populations are present, Order DOT 5610.2, “Environmental Justice in Minority and Low-Income Populations,” requires the provision of meaningful public involvement by minority and low-income populations. A desktop analysis from the EPA Environmental Justice Screening Tool found the following for Census Tract 122, which includes the residential acquisitions required for the runway extension: an average population below poverty of 11.8% and 8.2% minority.<sup>5</sup> compared to the state average of 9.8% below poverty and 32.5% minority and the County of Spokane average of 12.9% below poverty and 16% minority.<sup>6</sup> The median household income of Census Tract 122 is \$48,541 while the median household income of Spokane County and Washington state are \$54,852 and \$70,116<sup>7</sup>, respectively. Implementation of this project would require a more detailed analysis of socioeconomic impacts to determine if disproportionate effects would be born on low-income populations and would need to include adequate public engagement.

Although the impacts to natural resources associated with the runway extension are minimal, the property acquisitions associated with the project could require evaluation in an Environmental Assessment to demonstrate that mitigation would result in no significant impacts.

### **5.4.3 T-Hangar (East Infield) Development/Air Traffic Control Tower**

The area proposed for the T-Hangar development and the relocation of the air traffic control tower (ATCT) is in a developed area of the airport on which there are no natural resources. This area is proximate to the on-airport Felts Field Historic District and would have to be assessed for effects to the District under Section

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<sup>5</sup> US EPA EJ Screening Tool

<sup>6</sup> US Census Bureau Quick Facts

<sup>7</sup> US Census Bureau Quick Facts

106 of the National Historic Preservation Act. FAA would lead a Section 106 consultation with the Washington Department of Archaeology and Historic Preservation on the effects. The T-Hangar development (East Infield) and/or new ATCT in this area would have to be evaluated for the effect to the Felts Field Historic District. Consultation with the Washington Department of Archaeology and Historic Preservation could include submitting a report prepared by a qualified historian that assesses the potential for effects to the Felts Field Historic District. If there is an adverse effect, mitigation would have to be part of the consultation. Section 106 consultation is estimated to require 3 to 10 months and may be concurrent with preparation of NEPA documentation

In addition, development in this area would have to demonstrate compliance with local, state, and federal laws and requirements for protecting the Spokane-Rathdrum APA and the CARA of the Spokane River Watershed. The lack of resources indicates that development in this area could comply with NEPA through the completion of a Categorical Exclusion.

#### **5.4.4 Off-Airport Hangar Development**

Like the runway extension, the off-airport hangar development would require the acquisition of property. The acquisitions and relocation of the current residents and businesses are included in the cost estimates for implementing this project.

This project would require the acquisition of 36 residential parcels. When the acquisition of real property or displacement of persons is involved, the following federal regulations for federal projects and projects that involve federal funds must be met: 49 CFR Part 24, "Implementing the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970," as amended. A more detailed socioeconomic impact review would need to be conducted in the areas surrounding the acquisitions in order to meet the requirements of the Uniform Relocation Act.

Environmental Justice would need to be addressed in the areas of acquisitions to determine if there are disproportionate effects on low-income or minority populations, per Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." In addition, if such populations are present, Order DOT 5610.2, "Environmental Justice in Minority and Low-Income Populations," requires the provision of meaningful public involvement by minority and low-income populations. A desktop analysis from the EPA Environmental Justice Screening Tool found the following for Census Tract 115, which includes the residential acquisitions required for this development: an average population below poverty of 13.6% and 6.1% minority,<sup>8</sup> compared to the state average of 9.8% below poverty and 32.5% minority and the County of Spokane average of 12.9% below poverty and 16% minority.<sup>9</sup> The median household income of Census Tract 115 is \$42,967 while the median household income of Spokane County and Washington state are \$54,852 and \$70,116,<sup>10</sup> respectively. Implementation of this

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<sup>8</sup> US EPA EJ Screening Tool

<sup>9</sup> US Census Bureau Quick Facts

<sup>10</sup> US Census Bureau Quick Facts



project would require a more detailed analysis of socioeconomic impacts to determine if disproportionate effects would be born on low-income populations and would need to include adequate public engagement.

Although there would be no impacts to natural resources associated with the off-airport hangar development, the property acquisitions associated with the hangar project could require evaluation in an Environmental Assessment to demonstrate that mitigation would result in no significant impacts.