FINAL ENVIRONMENTAL ASSESSMENT PROPOSED AIRPORT TRAFFIC CONTROL TOWER

MARANA REGIONAL AIRPORT PIMA COUNTY, ARIZONA

Prepared for

Town of Marana

Ed Honea Marana Municipal Complex 11555 West Civic Center Drive Marana, Arizona 85653

U.S. Department of Transportation Federal Aviation Administration

As lead Federal Agency pursuant to the National Environmental Policy Act of 1969

Prepared by

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July 2025

Council on Environmental Quality Unique Identification Number for NEPA Documents: EAXX-021-12-ARP-179453388

This environmental assessment becomes a federal document when evaluated, signed, and dated by the Responsible FAA Official.

Responsible FAA Official			
N NEAL/	Date: 2025.07.14 07:07:00 -07'00'		
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7/14/2025

Date

GENERAL INFORMATION ABOUT THIS DOCUMENT

WHAT'S IN THIS DOCUMENT? This document is a final environmental assessment (Final EA) which has been completed under the National Environmental Policy Act (NEPA) for a proposed project at Marana Regional Airport. The Federal Aviation Administration (FAA) is the lead agency for the NEPA process. This document discloses the analysis and findings of the potential impacts of the Proposed Action and the No Action alternative.

PROPOSED ACTION: The Proposed Action is the construction, operation, and maintenance of an airport traffic control tower (ATCT) at Marana Regional Airport. An 8-acre site within the airport would be used for construction of an 112-foot-tall ATCT, new vehicle access road, and connection of utilities and septic system, as well as removal of the existing 50-foot-tall beacon tower and relocating the rotating beacon to the top of the new ATCT as a 28-inch-tall rotating beacon.

WHAT SHOULD YOU DO? Read the Final EA on the proposed project to understand the actions that the Town of Marana and FAA intend to take relative to the proposed project. Copies of the Final EA are available for download at https://www.maranaaz.gov/airport, and reading copies can be reviewed at the following locations:

Marana Regional Airport Administration Office	Ed Honea Marana Municipal Complex
11700 West Avra Valley Road	11555 West Civic Center Drive
Marana, Arizona 85653	Marana, Arizona 85653
(M–F 7:00 a.m.–4:00 p.m.)	(M–F 8:00 a.m.–5:00 p.m.)
mra@maranaaz.gov	
Wheeler Taft Abbett, Sr. Library	FAA Western-Pacific Region, Office of Airports,
7800 North Schisler Drive	Phoenix Airports District Office
Tucson, Arizona 85743	3800 North Central Avenue, Suite 1025
(M, W 10:00 a.m6:00 p.m.; T, Th 10:00 a.m	Phoenix, Arizona 85012
7:00 p.m.; F 10:00 a.m5:00 p.m.)	(M–F, 9:00 a.m.–4:00 p.m., by appointment only
. ,	[602-792-1075])

WHAT HAPPENS AFTER THIS? Following review of the Final EA, the FAA will issue a finding of no significant impact (FONSI) and a record of decision (ROD) or decide to prepare an environmental impact statement (EIS).

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ACRONYMS AND ABBREVIATIONS

ADEQ	Arizona Department of Environmental Quality	
airport	Marana Regional Airport	
Anza Trail, Anza NHT	Juan Bautista de Anza National Historic Trail	
ASLD	Arizona State Land Department	
ATCT	airport traffic control tower	
AVQ	Marana Regional Airport	
AZPDES	Arizona Pollution Discharge Elimination System	
CFR	Code of Federal Regulations	
CH ₄	Methane	
CO ₂	carbon dioxide	
CO _{2e}	Carbon dioxide equivalents	
CWA	Clean Water Act	
CWPP	Community Wildfire Protection Plan	
DOT	U.S. Department of Transportation	
Draft EA	draft environmental assessment	
EA	environmental assessment	
EPA	Environmental Protection Agency	
ESA	Endangered Species Act	
FAA	Federal Aviation Administration	
FEMA	Federal Emergency Management Agency	
FPPA	Farmland Protection Policy Act	
GHG	greenhouse gas	
HAP	Hazardous air pollutants	
KOP	key observation point	
LOMR	Letter of Map Revision	
MOVES	EPA's MOtor Vehicle Emission Simulator	
NAAQS	National Ambient Air Quality Standards	
NEPA	National Environmental Policy Act of 1969	
NHT	National Historic Trail	
N_2O	Nitrous oxide	
NO_2	Nitrogen dioxide	
NPS	National Park Service	

O ₃	Ozone	
OTR	Ozone Transport Region	
Pb	Lead	
PL	Public Law	
PM _{2.5}	particulate matter 2.5 microns in diameter or smaller	
PM_{10}	particulate matter 10 microns in diameter or smaller	
Quadrex	Quadrex Aviation, LLC	
RTA	Regional Transportation Authority	
SCRT	Santa Cruz River Trail	
SIP	State implementation plan	
SHPO	State Historic Preservation Office	
Siting Report	Siting Report: Safety Risk Management Document New Airport Traffic Control Tower (Quadrex et al. 2022)	
SO ₂	Sulfur dioxide	
sponsor	Town of Marana	
TAMA	Tucson Active Management Area	
Town	Town of Marana	
USC	United States Code	
USFWS	U.S. Fish and Wildlife Service	
VOC	Volatile organic compounds	

1 INTRODUCTION

The Town of Marana (sponsor) has prepared the necessary planning and environmental documentation for a new airport traffic control tower (ATCT) at the Marana Regional Airport (airport or AVQ) in Marana, Arizona (herein called the project, or the Proposed Action). The Proposed Action is subject to the requirements of Section 102(2)(c) of the National Environmental Policy Act (NEPA) of 1969 (Public Law [PL] 91-190, Title 42 United States Code [USC] Section 4321 et. seq.).

The Federal Aviation Administration (FAA) is responsible for complying with the procedures and policies of NEPA and other environmental laws, regulations, and orders applicable to FAA actions. Proposed actions and decisions by FAA officials (such as approval for a proposed ATCT) are subject to NEPA review. As the lead agency, the FAA has the primary responsibility for preparation of the NEPA document. The FAA decision-making process must consider and disclose the potential impacts of a proposed ATCT and its alternatives on the quality of the human environment. The FAA also invites federal, state, tribal, and local agencies with special expertise or jurisdiction by law to be cooperating agencies and assist the FAA by providing input or reviews. The resultant NEPA document—this environmental assessment (EA)—must fully assess and disclose potential environmental impacts resulting from the Proposed Action and alternatives. Additionally, the FAA must solicit appropriate information from the public, provide the public with the disclosed information and analysis, and allow public comment on the findings.

The FAA's NEPA process is guided by FAA Order 1050.1F (FAA 2015), with specific EA guidance provided in Section 3-1.2: Actions Normally Requiring an Environmental Assessment and Chapter 6: Environmental Assessments and Finding of No Significant Impact. FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions (FAA 2006), and 1050.1 Desk Reference (FAA 2023) supplement and provide additional instructions.

1.1 Airport Location and Project Background

The Marana Regional Airport, owned and operated by the Town of Marana (Town), is a general aviation facility that maintains two runways and terminal facilities and serves as a designated reliever airport for Tucson International Airport (Town of Marana 2019). The airport is located in Marana, Pima County, Arizona, to the west of Interstate 10 (Figure 1-1) at an elevation of 2,031 feet above mean sea level. The airport covers approximately 570 acres and has two intersecting asphalt runways. Runway 12/30, the primary runway, is 6,901 feet long by 100 feet wide. Runway 3/21, the crosswind runway, is 3,892 feet long by 75 feet wide. Full-length parallel taxiways include Taxiway A (6,901 feet long by 50 feet wide) and Taxiway B (3,892 feet long by 35–50 feet wide). Taxiways C, E, and H, along with a series of connector taxiways, provide access to and from hangars and runways. Primary access for visitors, passengers, pilots, aviation workers, and airport staff is through the main airport entrance on the north side of West Avra Valley Road.

The 2017 Marana Regional Airport Master Plan (Town of Marana 2017) provides guidance for future airport development, improvements to air and ground operations, and enhancements to both airport services and safety for public users. This guidance includes the Proposed Action being evaluated in this EA.

1.2 Description of the Proposed Action

The Proposed Action includes the following components:

- construction of a new ATCT that would be 112 feet tall (123 feet tall including rotating beacon, antennae, and lightning protection system [i.e., lightning rods]) and base building;
- connection of utilities and septic system to the proposed ATCT;
- construction of a new vehicle access road and parking area; and
- removal of the existing 50-foot-tall beacon tower and relocating the rotating beacon to the top of the new ATCT as a 28-inch-tall rotating beacon (including an 8-inch-high by 12-inch-wide lens).

The Proposed Action would require 8 acres. If approved, construction is anticipated to last 12 to 24 months. See full description of the Proposed Action in Section 2.3.1.

1.3 Purpose and Need

The FAA's overall purpose and need is to fulfill its statutory mission, which is to ensure the safe and efficient use of navigable airspace in the United States. In this case, the Town seeks to amend its airport layout plan to include an ATCT. The role of an ATCT is to communicate with pilots and direct aircraft movements in a safe and efficient manner.

The need for the Proposed Action is to address a series of ongoing challenges that airport users increasingly face, such as (Town of Marana 2023):

- They need to be aware of the diverse types of operations occurring at the airport and complexity of the airspace, which include corporate jets, military operations, flight training, rotary wing aircraft, and skydiving (civilian and military). For example, users must vigilantly monitor the airport's common radio frequency (i.e., UNICOM), especially since corporate jet aircraft typically move faster than single-engine piston aircraft.
- They need to communicate with an increasing number of other users on a single radio channel. In 2023, more than 75,000 annual operations occurred at the airport, and operations are expected to increase (Quadrex Aviation, LLC, [Quadrex] et al. 2022, 2024). Currently, all active aircraft indicate their position by using the airport's common radio frequency.
- They need to visually distinguish between AVQ's Runway 12/30 and Pinal Airpark's similarly marked Runway 12/30, located 8 miles to the northwest, without verbal confirmation from an observer at either airport. In the past, some pilots have confused the two runways, creating potential conflicts with other users.²

Looking ahead, airport users need a better communication method to operate safely and efficiently. Therefore, the purpose of the Proposed Action would be to improve communications for the safe and efficient operation of aircraft, prevent collisions and other accidents, ensure airport users have safe access to movement areas and runway approaches, and enhance overall airport efficiency.

¹ 49 USC 47101(a)(1).

² AVQ Damage/Loss of Town Property Report 7.1, dated June 18, 2023: Where 2,363 square feet of TWY E asphalt was extensively damaged when an Airbus 310 T7-FTH inadvertently landed and overshot RWY 12-30. Per T.O.M. Insurance Claim #2023-98, dated June 29, 2023: \$15,393.31 cost to replace the damaged asphalt.

1.4 Requested Federal Actions

The Town requests the FAA take the following actions to support the Proposed Action:

- Unconditional approval of the portion of the airport layout plan that depicts the Proposed Action, pursuant to 49 USC 40103(b), 44718, and 47107(a)(16) and 14 CFR Part 77 and Part 157; and
- FAA determination of project eligibility for federal funding (e.g., Airport Improvement Program).

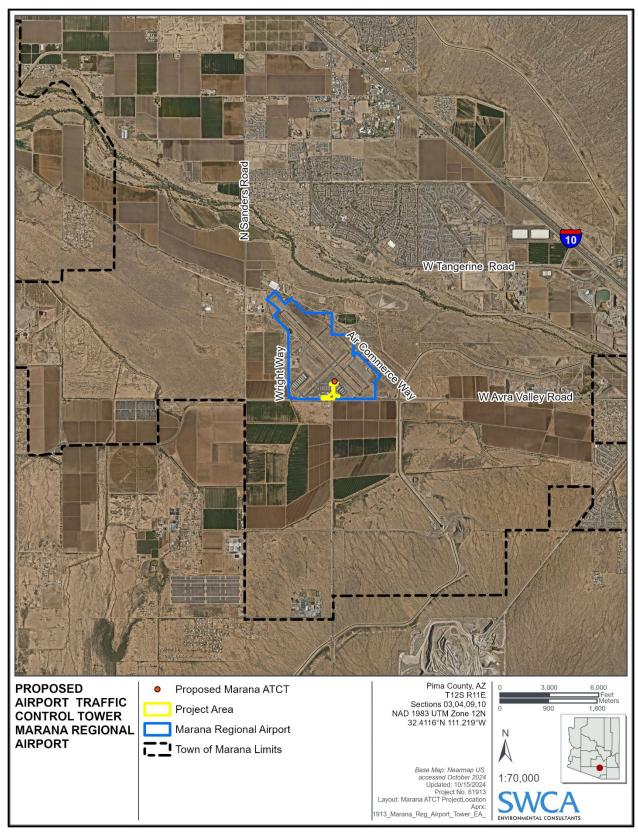


Figure 1-1. General location of the proposed project.

2 ALTERNATIVES

The FAA, through the Phoenix Airports District Office, will serve as the lead agency in the NEPA process for airport actions, and the Town of Marana serves as a participating agency. The format and subject matter included within the resulting NEPA documentation will conform to the requirements and standards set forth by the FAA.

2.1 Siting Criteria

The siting criteria outlined in the Town's Siting Report³ were developed in collaboration with the FAA's Airway Facilities Tower Integration Laboratory and the Virtual Immersive Siting Tower Assessment for a new ATCT in the Federal Contract Tower program (Quadrex et al. 2022). These criteria align with the requirements in FAA Order 6480.4B.

Potential sites are evaluated as alternatives through a two-step screening process. The first step assesses whether the alternatives are "reasonable." An alternative is considered reasonable if it meets the purpose and need identified in Section 1.3 of this EA.

If an alternative is deemed reasonable, the second step determines if the alternative is "feasible." The feasibility of an alternative is established by considering other important factors, such as logistical, technical, or cost considerations. Key technical factors considered for an ATCT location include:

- visibility performance requirements and line-of-sight angle;
- sunlight/daylight;
- artificial lighting;
- atmospheric conditions;
- safety; and
- operational requirements, including orientation, weather phenomena, visibility, look-down angle, look-across distance, and economic considerations.

2.2 Alternatives Considered

Alternatives developed and evaluated for this project include the No Action alternative and the Proposed Action (i.e., the project). The No Action alternative serves as a benchmark to compare against the Proposed Action's environmental effects.

The Siting Report initially included eight candidate sites for the Proposed Action that were analyzed by the siting team and airport staff (Quadrex et al. 2022). Airport staff and the siting team identified Site 5 as the preferred location. Site 5 is the location of the Proposed Action.

³ New Airport Traffic Control Tower Siting Report prepared by AJT Engineering, Inc.

2.3 Alternatives Carried Forward for Detailed Evaluation

2.3.1 Proposed Action (Preferred Alternative)

The Proposed Action would include the following components:

- construction of a new ATCT that would be 112 feet tall (123 feet tall including rotating beacon, antennae, and lightning protection system [i.e., lightning rods]) and base building;
- connection of utilities and septic system to the proposed ATCT;
- construction of a new vehicle access road and parking area; and
- removal of the existing 50-foot-tall beacon tower and relocating the rotating beacon to the top of the new ATCT as a 28-inch-tall rotating beacon (including an 8-inch-high by 12-inch-wide lens). The existing beacon tower foundation will be left in place.

Permanent new facilities for the project would occupy 0.9 acres. Ground disturbance would be limited to the extent of the proposed new construction and temporary spaces needed for staging and storage, totaling 7.58 acres. Figures 2-1 and Figure 2-2 illustrate the Proposed Action location and components.

If approved by the FAA, construction of the proposed ATCT could begin in January 2026 and would last 12 to 24 months. All construction activities would occur Monday through Friday and would be restricted to daylight hours.

The Proposed Action would not change the current operations and maintenance of the airport and would not increase the capacity of the airport. The Proposed Action would not modify the airfield, or accommodate a greater number of, higher frequency of, or larger aircraft.

CONSTRUCT PROPOSED ATCT AND BASE BUILDING

The proposed ATCT would be centrally located south of the intersection of Runways 12/30 and 3/21. The proposed ATCT would measure 112 feet tall to top of the cab—totaling 123 feet tall inclusive of antennae, rotating beacon, and lightning protection system—and includes an octagonal (eight-sided) 35-foot-tall cab mounted at 99.2 feet above ground level. The cab would rest atop a roughly square-shaped ATCT shaft with a footprint measuring approximately 24 by 24 feet. While the square-shaped ATCT base would be oriented following the four cardinal points, the cab would be aligned 15 degrees counterclockwise in relation to the ATCT shaft itself. The foundation for the proposed ATCT would consist of 4-by-4-foot grade beams on nine, 42-inch-diameter drilled shafts excavated to a depth of 35 feet.

The project, as proposed, also includes construction of a 1,015-square-foot base building. Its foundation would consist of 2-foot shallow-spread footings with a 1-foot-thick slab-on-grade pad (5 feet above top-of-grade beams).

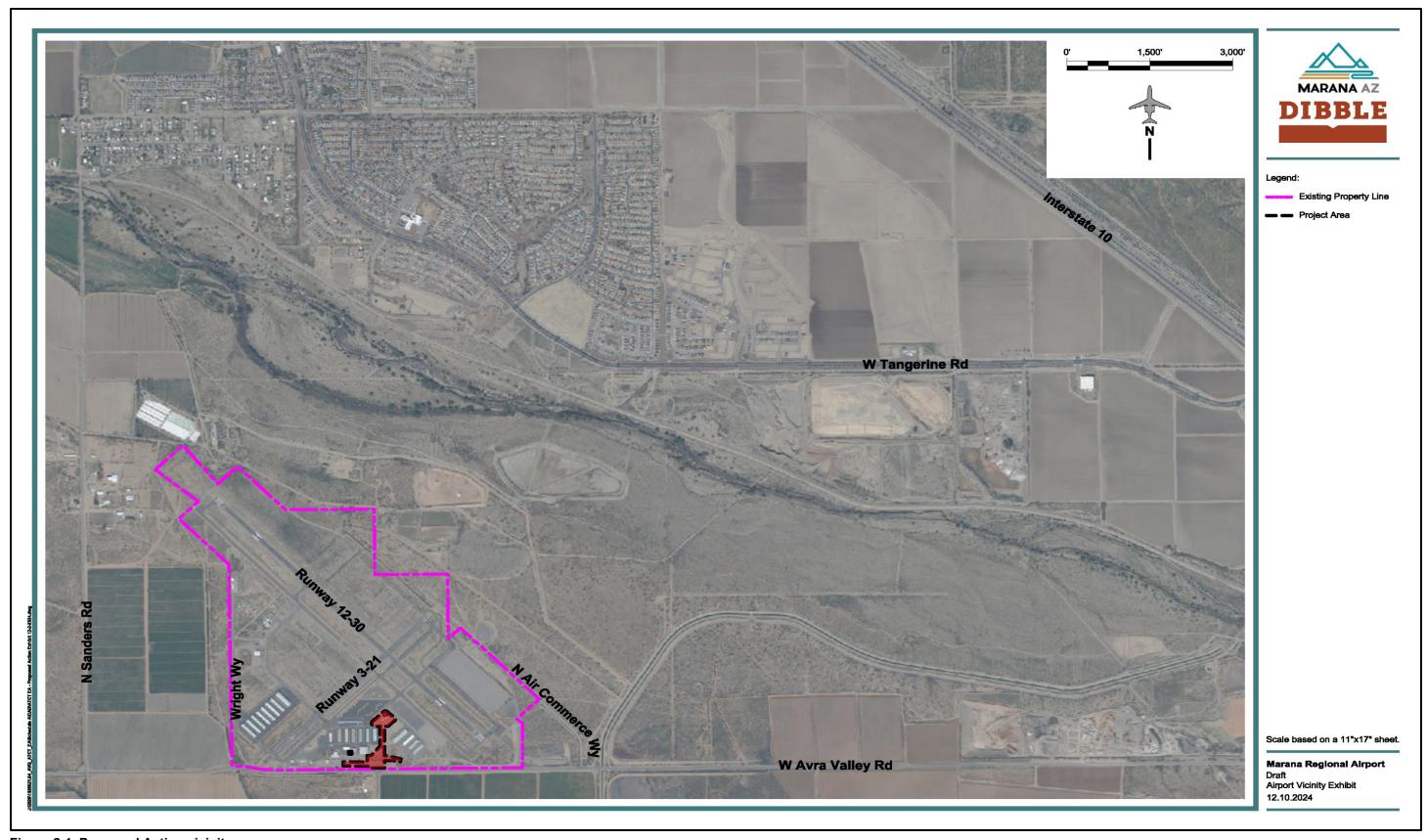


Figure 2-1. Proposed Action vicinity.

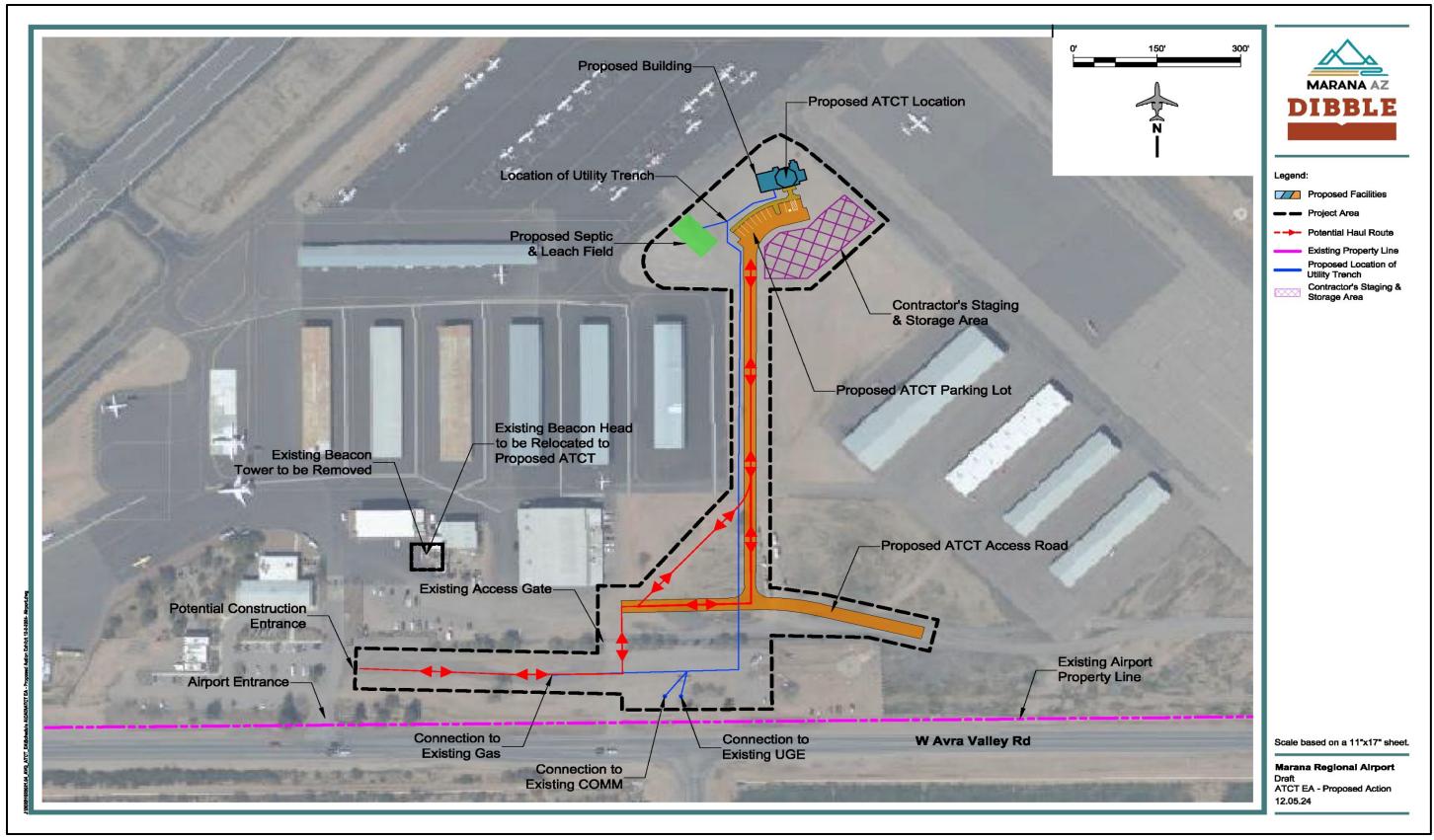


Figure 2-2. Proposed Action project area.

CONNECT UTILITIES

The proposed ATCT and base building would also require new underground utility connections including electric, water, gas, and telecommunications services. An 18-inch-wide joint dry utilities trench would be installed for electric, gas, and telecommunications lines, extending approximately 1,240 feet in length from the base building southward to the existing utility connections next to West Avra Valley Road. The joint dry utilities trench would be excavated to a depth of 42 inches. The water line would be placed in a 260-foot-long, 18-inch-wide trench excavated to a depth of 4 feet and would connect to the existing water line south of the new parking lot.

A new septic system (sewer line, septic tank, and accompanying leach field) would also be constructed to support the proposed ATCT and base building. The sewer line would be installed in a trench measuring 100 feet long, 18 inches wide, and excavated to a depth of 6 feet. The corresponding new septic tank would be placed in a trench approximately 10 by 6 feet in size and excavated to a depth of 8 feet. Finally, the leach field would measure 69 by 49 feet (3,381 square feet) and would be excavated to a depth of 6 feet.

New construction for the proposed ATCT would also include installation of new ATCT-specific equipment and computer systems. This includes the removal of an existing 50-foot-tall beacon tower (leaving the 10-by-10-foot, 6-inch-thick concrete slab foundation in place) and the relocation of the 28-inch-tall rotating beacon to the top of the new ATCT on an 18-inch square-mounting base. This way, the beacon would not shine into the cab of the ATCT and interfere with controllers' observations.

CONSTRUCT NEW ACCESS ROAD AND VEHICLE PARKING AREA

Construction of the proposed ATCT and base building would also include a new asphalt-paved vehicle parking lot for ATCT personnel and visitors, measuring 139 feet by 42 feet (5,838 square feet) in area. The proposed ATCT would be accessed via a new asphalt road (oriented north-south) and new asphalt access road extension from the existing roadway termination (oriented east-west). The new access road would be 692 feet long and 20 feet wide (totaling 13,840 square feet of newly paved surface). The new asphalt access road extension would be 548 feet long and 24 feet wide (totaling 13,152 square feet). All new pavement would consist of a 10-inch total pavement section depth, with 4 inches of asphalt atop 6 inches of aggregate base course.

OPERATIONS AND MAINTENANCE

The Town would be responsible for all operations and maintenance costs once the project is complete, including utilities, repairs, and custodial services. The operational schedule for the proposed ATCT would be set in accordance with FAA requirements, but it is anticipated that the proposed ATCT would be staffed by two to three people per day and follow typical ATCT operations, which generally occur from 6:00 a.m. to 10:00 p.m., 7 days a week.

2.3.2 No Action Alternative

Under the No Action alternative, there would be no construction, operation, or maintenance of an ATCT at AVQ and its facilities would remain in their existing state and configuration. The current airport operations would remain in place with no ATCT. The No Action alternative would not meet the project's purpose and need, but is retained for comparison purposes for the analysis in Chapter 3.

2.4 Alternative Screening Process Summary

The discussion below identifies the alternatives discussed in the preceding sections and summarizes the alternatives screening process. Whether a proposed alternative is reasonable depends largely upon the extent to which it meets the purpose and need for the Proposed Action.

➤ <u>Step 1: Reasonable?</u> Would the alternative allow traffic control personnel to see (visually), communicate with, observe (remotely or otherwise), direct, and control operations within the areas of the airport designated as the control movement areas?

Five of the initial eight candidate sites were eliminated for not meeting the reasonable criteria: Sites 1, 3, 6, 7, and 8. Site 6, located on the east side of the airfield, was eliminated due to the distance to the busiest west side of the field and lack of infrastructure to support the site. Sites 1, 3, and 7 were eliminated due to the required crossing of movement areas to access the proposed ATCT site. Site 8 (shown on the 2018 approved Airport Layout Plan) was eliminated due to the required height that would be necessary to overcome shadowing by nearby buildings. Sites 2, 4, and 5 were carried forward by the team and airport staff for feasibility evaluations.

➤ <u>Step 2: Feasible?</u> Is the necessary infrastructure to operate an ATCT available at the site without extensive costs to provide utility connections when compared to alternate sites?

Sites 2, 4, and 5 were further analyzed with the FAA virtual immersive siting ATCT assessment team. During this process, Site 2 was eliminated from the analysis by the subject matter expert (Air Traffic Control Specialist) due to the distance from the busy area around Runway 3 and the Runway 3 approach airspace. Additional issues included view angles and distance to the Runway 3 threshold. The floor height of the cab would need to be increased due to shadowing by existing hangars adjacent to the Runway 3 threshold, and the east orientation toward the primary runway approach had severe sun glare issues.

Although Site 4 was within a short distance of Site 5, it was ultimately eliminated due to the taller height of the proposed ATCT that would be required in that location. Additional height increased the cost of the Site 4 option; thus, Site 4 was deemed less preferable than Site 5.

Site 5 was identified as the preferred location by airport staff and the siting team, having the highest ranking for reasonable and feasible evaluations. Site 5 was found to have unobstructed views of all movement areas on the airfield. Similarly, it also has the best views of a majority of the most active non-movement areas. There are no movement or non-movement areas obstructed by look-down angle and there are no other line-of-sight obstructions on any existing or proposed movement areas. Therefore, Site 5 was the first choice of all siting team members and was also identified as the preferred site in the safety risk management analysis, in which the site meets all criteria. The only noted impact, though not considered a hazard, is the ATCT's penetration of the 7 to 1 tranitional surface of Runway 3-21, as established in 14 CFR Part 77.19(e). Obstruction lighting will be installed at the top of the ATCT structure to mitigate the penetration. There are no other significant impacts related to NASWatch, U.S. Standard for Terminal Instrument Procedures, line of sight, 14 CFR Part 77, future airport development, or local weather phenomena with the potential to impair visibility (Quadrex et al. 2022).

Only the Proposed Action satisfies both criteria contained in the screening process; therefore, it is carried forward for evaluation in Chapter 3.

2.5 Permits, Licenses, and Approvals Required

Grading and building permits to allow for the construction of the ATCT are required from the Town of Marana. A building permit from Pima County is also required for new utilities, including septic systems.

In addition, Pima County requires compliance with their Fugitive Dust Activity Permit Program for soil-disturbing or construction activities 1 acre or greater in overall area, mechanized trenching 500 feet or greater in length, road construction over 50 feet, or blasting (Pima County Department of Environmental Quality 2024).

2.6 List of Special Purpose Laws and Requirements Considered

Table 2-1 through Table 2-3 list federal laws and statutes, Executive Orders, U.S. Department of Transportation (DOT) orders, and FAA orders and advisory circulars considered in the preparation of this EA

Table 2-1. Federal and Other Laws and Statutes

36 CFR Part 800, Protection of Historic Properties

Federal Laws and Statutes
Airport and Airway Improvement Act of 1982, as amended (PL 97-248; 43 CFR 2640)
Airport and Airway Revenue Act of 1987 (PL 100-223, Title IV)
Archeological and Historic Preservation Act of 1974 (PL 93-291, 16 USC 469)
Aviation Safety and Capacity Expansion Act of 1990 (PL 101-508, as amended)
Clean Air Act of 1977, as amended (42 USC 7409 et seq.) and FAA's Presumed to Conform List (72 Federal Register 1565 July 30, 2007)
Comprehensive Environmental Response, Compensation, and Liability Act (42 USC 9601; PL 96-510)
Endangered Species Act of 1973 (PL 85-624; 16 USC 661, 664 note, 1008 note)
Federal Aviation Administration Reauthorization Act of 2024 (PL 118-63)
Federal Aviation Administration Order 6480.4B
Federal Water Pollution Control Act Amendments for 1972, Section 404 (33 USC 1344; PL 92-500), as amended by the Clean Water Act of 1977 (33 USC 1251; PL 95-217)
Migratory Bird Treaty Act (16 USC 703 et seq.)
National Environmental Policy Act of 1969 (PL 91-190; 42 USC 4321 et seq.)
National Historic Preservation Act of 1966, Section 106 (16 USC§470[f]; PL 89-665)
Noise Control Act of 1972 (PL 92-574; 42 USC 4901)
Pollution Prevention Act (42 USC 13101-13109)
Resource Conservation and Recovery Act of 1976 (42 USC 6901, et seq.); PL 94-580, as amended by the Solid Waste Disposal Act of 1980 [PL 96-482]; and the 1984 Hazardous and Solid Waste Amendments [PL 98-616])
U.S. Department of Transportation Act of 1966 – Section 4(f) (as amended by 49 USC 303, Policy on lands, wildlife and waterfowl refuges, and historic sites [PL 97-449])
14 CFR Part 150, Airport Noise Compatibility Planning

Federal Laws and Statutes

50 CFR Part 17, Endangered and Threatened Wildlife and Plants

50 CFR Part 21, Migratory Bird Permits

50 CFR Part 402, Interagency Cooperation - Endangered Species Act of 1973, as amended

Other Laws and Statutes

Pima County Community Wildfire Protection Plans (CWPPs)

Table 2-2. Executive Orders

Executive Orders

Executive Order 11514, Protection and Enhancement of Environmental Quality (March 4, 1970)

Executive Order 11593, Protection and Enhancement of the Cultural Environment (May 13, 1971)

Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks (April 21, 1997)

Executive Order 13112, Invasive Species (February 3, 1999)

Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 9, 2000)

Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds (January 17, 2001)

Table 2-3. U.S. Department of Transportation and Federal Aviation Administration Orders

DOT and FAA Orders

DOT Order 5301.1, Department of Transportation Programs, Policies, and Procedures Affecting American Indians, Alaskan Natives, and Tribes (November 16, 1999)

DOT Order 5650.1, Protection and Enhancement of the Cultural Environment (November 20, 1972)

FAA Order 1050.1F, Environmental Impacts: Policies and Procedures (July 16, 2015)

FAA Order 1210.20, American Indian and Alaskan Native Tribal Consultation Policy and Procedures (January 28, 2004)

FAA Order 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions (April 28, 2006)

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The FAA reviewed the environmental impact categories as found in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* (Chapters 1-14). The environmental impact categories are reviewed to identify 1) the categories that do not have the potential to be impacted by the proposed action and its reasonable alternatives; and 2) the categories that may be impacted by the proposed action and its reasonable alternatives. Significance thresholds may be quantitative criteria or qualitative factors. The FAA considers impacts determined to reach or exceed quantitative thresholds—for categories where a threshold exists—significant. For resources where there is no defined quantitative threshold, the FAA considers qualitative significance factors to determine if the project's impact is significant.

The environmental impact analysis in this chapter assesses whether potential impacts of the Proposed Action would significantly affect the human environment, as defined by FAA's NEPA implementing guidance in FAA Orders 5050.4B and 1050.1F (FAA 2006, 2015). The analysis describes environmental resources present in the study area or vicinity (i.e., the affected environment) and the anticipated impacts to those resources resulting from construction or operation of the project's alternatives (i.e., environmental consequences).

For purposes of this analysis, the "project area" includes the area encompassing all components that are part of the Proposed Action. For each resource, a specific "analysis area" is defined that encompasses a larger area where potential environmental impacts may occur. For each resource addressed in detail below, the specific analysis area (including both geographic and temporal limits) is defined.

3.1 Environmental Impact Categories Not Affected

The No Action alternative and Proposed Action do not have the potential to affect the categories identified in Table 3-1. because the resources do not exist at the airport or the nature of the project would not result in impacts to these resources. Due to their lack of potential impacts, discussion of the impacts related to these categories is limited to Table 3-1.

Table 3-1. Issues Not Carried Forward for Detailed Analysis

Category	Effect/ Impact	Rationale for No Further Discussion
Biological Resources	No Effect	A biological resource evaluation was prepared to evaluate impacts and none of the 10 threatened, endangered, or candidate species would be impacted by construction and operation of the ATCT (U.S. Fish and Wildlife Service IPaC and Arizona Game and Fish Department, Appendix B). Only one species has the potential to occur in the project area: the monarch butterfly, a candidate species not currently afforded protection under the Endangered Species Act (ESA). The project may impact individual monarch butterflies but is not likely to result in a trend toward federal listing or loss of population viability. No designated critical habitat is present within the project area. The FAA made a finding of "no effect" per Section 7 of the ESA and therefore consultation with the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service is not required (see Appendix B).
		Based on a review of the Arizona Game and Fish Department's Environmental Review Tool Report, no special areas (i.e., critical habitat, important bird areas, wildlife connectivity areas, etc.) were recorded within the project area (see Appendix B). The report also indicated two species (Gila monster and Harris's hawk) have the potential to intersect the project area; however, birds protected under the Migratory Bird Treaty Act and/or Bald and Golden Eagle Protection Act were considered based on occurrence or warranting special attention in this area.
		In addition, the Town and its contractor will implement best management practices to avoid and minimize potential adverse effects to biological resources (see Section 3.8)

Category	Effect/ Impact	Rationale for No Further Discussion		
Coastal Resources	No Impact	The Coastal Zone Management Program is specifically designed for states and territor with coastlines along the Atlantic and Pacific Oceans, the Gulf of Mexico, and the Great Lakes. Arizona, located in the southwestern region of the United States, is landlocked and, therefore, ineligible for inclusion in the Coastal Zone Management Program. The project is within Arizona and would not impact any coastal resources.		
Farmlands	No Impact	The project would occur entirely on airport property, which is situated within a growth area targeted for employment, as outlined in local land use plans. Under Section 523(10)(B) of the Farmland Protection Policy Act (FPPA), land that is committed to urban development is exempt from the FPPA's provisions. The project would not involve the acquisition or conversion of any farmland, and no impacts to farmlands would occur.		
Hazardous Materials, Solid Waste, and Pollution Prevention	No Effect	Construction and operation of the project would not include the use of hazardous materials, except for chemical constituents contained in fuels (gasoline and diesel fuel) and lubricants (oil and grease). The Town of Marana and its contractors would comply with all hazard communication and hazardous material laws and regulations regarding these chemicals. They would also adhere to the Marana Regional Airport Emergency Plan (Town of Marana 2024a), which provides guidance for implementation of spill prevention, control, and countermeasures to minimize the leaks of motor oils, hydraulic fluids, and fuels and response to emergency situations. In addition, the Town and its contractors would comply with all applicable federal and state regulations regarding notices to federal and local emergency response authorities and development of applicable emergency response plans, if required. With these measures and implementation of design features, impacts from hazardous materials would not occur (see Section 3.8).		
Historical, Architectural, Archaeological, and Cultural Resources	No Effect	A cultural resources evaluation and built environment evaluation were conducted to address potential impacts to historical, architectural, archaeological, and cultural resources. The reports found that historic properties are not present in the Proposed Action footprint where ground-disturbing activities are planned. Although historic properties are present within other portions of the area of potential effects where the proposed ATCT would introduce a visual change, the Proposed Action would not diminish historic properties' integrity of setting or feeling because of the ATCT's size relative to the historic properties' locations, which are 0.5 to 3.0 miles away.		
		Based on these analyses, the FAA found "no adverse effect" on historic properties per Section 106 of the National Historic Preservation Act. The FAA consulted with the Arizona State Historic Preservation Office (SHPO) and Tribes with interest in the project area. SHPO concurred with the FAA's finding in a letter dated May 21, 2024. Of the Tribes that responded, no concerns or comments were received disagreeing with the finding. Copies of the consultation letters and response matrix are included as Appendix C.		
Natural Resources and Energy Supply	No Impact	Construction of the Proposed Action would consume natural resources (such as water, asphalt, aggregate, wood, etc.) that the Town would procure from approved local sources. Operation of the Proposed Action would use energy supplies (such as energy for electricity and natural gas for heating), consistent with current airport operations. No increase in demand to local utilities' energy capacity would be required, and the natural resource and energy supply demands of the Proposed Action would not exceed the available supply.		
Noise and Compatible Land Use	No Impact	Implementation of the Proposed Action would not increase airport capacity or add additional aircraft, vehicle use, or other factors that could affect noise levels or land use around the airport. Construction related to the Proposed Action would not be perceptible over other ambient noise. The nearest sensitive receptors are rural residential dwellings, 1.2 miles southeast of the project area. Construction equipment noise would be short term. The noise from project operations would not exceed current noise levels.		

Category	Effect/ Impact	Rationale for No Further Discussion			
Socioeconomics and Children's	No Effect	Implementation of the project would not cause disruption of communities, relocations, or disproportional socioeconomic impacts.			
Environmental Health and Safety Risks		The project was evaluated for the potential to pose environmental health risks and safety risks that could disproportionately affect children. The analysis identified project effects that may pose a risk to health or safety and expose children to products or substances they are likely to come in contact with or ingest, such as air, food, water, recreational waters, soil, or products. The nearest school, Gladden Farms Elementary School, is over 1 mile to the northeast, and Marana High School is 2.4 miles to the southwest. The nearest parks include Gladden Farms Community Park and the Santa Cruz River Park. There are no listed daycares or health clinics within 3 miles of the project area. The nearest residential areas are approximately 2 miles from the project area, including Gladden Farms to the northeast and unnamed rural residential areas to the southwest. U.S. Census community statistics data is provided in Appendix D. Although children live and attend school within 3 miles of the project area, the project would not result in new health or safety risks to children. Project activities are limited to placement and relocation of new structures within the airport boundaries and would not increase airport capacity or add additional aircraft, vehicle use, or other activities that would directly or indirectly expose children to new products or substances, including changes in air pollution. The project may result in beneficial impacts related to employment due to potential for hiring temporary new employees during construction. The number of permanent operations staff employed by the Town is anticipated to remain at current levels; and, two to three new federal employees are anticipated to be permanently employed.			
		The Town has conducted extensive outreach to notify local communities of this Proposed Action and traffic related to movement of construction materials would be short-term. With consideration of these outreach efforts, no adverse impact to local communities related to construction vehicle traffic is anticipated.			
Water Resources (subcategories wetlands, wild and scenic rivers, and groundwater)	No Impact	No waters of the U.S., including wetlands or wild and scenic rivers, are present in the project area; therefore, no impacts to these resources would occur. According to the Arizona Department of Water Resources (2004) well registry, the depth to groundwater at the nearest well, located approximately 1,500 feet southeast of the project site, is between 215 and 250 feet. Project construction and implementation would not impact groundwater, as the excavation depth for the project's foundations would not reach groundwater.			
		Construction would require ground disturbance of more than 1 acre and would therefore have the potential to produce stormwater discharge. The Town or its contractors would prepare a Stormwater Pollution Prevention Plan and file a Notice of Intent with Arizona Department of Environmental Quality under the Construction General Permit portion of their Arizona Pollution Discharge Elimination System (AZPDES) permitting program. All requirements of AZPDES would be followed until the project is completed. With these measures and implementation of construction best management practices, impacts related to stormwater discharge would not occur (see Section 3.8).			

^{*} In general, short-term impacts are those that would occur only during the time required for construction or installation activities (e.g., 11 months or less). Long-term impacts are those that are more likely to be persistent during operation and maintenance (e.g., 11 months or longer).

The Proposed Action has the potential to impact the following environmental impact categories listed in FAA Order 1050.1F, which are discussed in the following sections:

- Air Quality
- Climate
- Department of Transportation Act, Section 4(f)
- Land use
- Visual effects (subcategories light emissions and visual resources/ visual character)
- Water resources (subcategories floodplains and surface waters)

3.2 Air Quality

• Would the project increase criteria air pollutant concentrations to exceed one or more of the National Ambient Air Quality Standards (NAAQS), as established by the U.S. Environmental Protection Agency (EPA) under the Clean Air Act, for any of the time periods analyzed, or increase the frequency or severity of any such existing violations?

3.2.1 Affected Environment

ANALYSIS AREA (GEOGRAPHIC AND TEMPORAL)

The Marana Regional Airport is located in Pima County, which is in attainment for all criteria pollutants except for respirable particulate matter (PM_{10}) . The project area is located within the Rillito moderate non-attainment area for PM_{10} .

The nearest air quality monitoring station is located in Rillito about four miles to the east of the project location. The average PM_{10} concentration measured at the station from 2021 through 2023 is presented in the table below. These averages are below the PM_{10} standard of 150 micrograms per cubic meter.

Table 3-2. Local Air Quality Monitoring Station Data

Monitoring Station	Monitoring Station Number	Address	Distance from Project Area	Pollutant Standard	2021 Arithmetic Mean (μg/m³)	2022 Arithmetic Mean (µg/m³)	2023 Arithmetic Mean (µg/m³)
Rillito	04-019-0020	8840 W Robinson Street, Rillito, AZ	4.0 miles east	PM ₁₀ – 24-hr Average (150 μg/m³)	51.71	45.05	46.28

Source: U.S. EPA Air Data Air Quality Monitors

Regulatory Context

Under the *Clean Air Act* (42 USC §§7409 et seq.), the U.S. EPA established NAAQS based on health risks for the following pollutants:

- Respirable particulate matter (PM₁₀) (i.e., with an aerodynamic diameter of 10 microns or less)
- Fine particulate matter (PM_{2.5}) (i.e., with an aerodynamic diameter of 2.5 microns or less)
- Carbon monoxide (CO)
- Nitrogen dioxide (NO₂)
- Sulfur dioxide (SO₂)
- Lead (Pb)
- Ozone (O₃)

Based on federal air quality standards, an area can be classified as an attainment, maintenance, or nonattainment area for each criteria pollutant. A state implementation plan (SIP) that prescribes measures to bring the levels of nonconforming pollutants into conformance with the NAAQS is required for each nonattainment area. The threshold for nonattainment designation varies by pollutant.

Federal actions planned to occur within a nonattainment or maintenance area that do not fall under a *Clean Air Act* exemption or are not listed on FAA's approved "presumed to conform" list must undergo a *de minimis* comparison to determine whether a formal General Conformity Determination is required.

The Marana area is in attainment for all federal criteria pollutants except PM₁₀. Specifically, the area is located within the Rillito PM₁₀ moderate non-attainment area; therefore, a General Conformity Determination under the *Clean Air Act* is required for PM₁₀ for this project. A construction emissions inventory for the Proposed Action was prepared using the U.S. EPA's Motor Vehicle Emission Simulator (MOVES). This methodology is identified in the FAA's *Air Emissions and Air Quality Handbook* as the "current EPA-approved model used to compute motor vehicle emissions rates representative of various types of vehicles and activities." MOVES5 national average emission factors for 2026 were used for off-road sources and MOVES4 national average emission factors for 2026 were used for on-road sources. The MOVES model produces emissions factors which are used to calculate emissions expressed in hours of activity for off-road equipment (such as graders or excavators) and based on miles driven for on-road vehicles (such as cement trucks or passenger cars). Estimates of grading and construction activities were used to estimate emissions from construction equipment activity.

3.2.2 Environmental Consequences

SIGNIFICANCE THRESHOLD / IMPACT INDICATOR

The FAA has established a significance threshold for impacts to Air Quality resources (FAA Order 1050.1F Exhibit 4-1:4-4).

 The action would cause pollutant concentrations to exceed one or more of the National Ambient Air Quality Standards (NAAQS), as established by the Environmental Protection Agency under the Clean Air Act, for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations.

DIRECT AND INDIRECT IMPACTS

No Action

Under the No Action alternative, airport operations would remain the same. The No Action alternative would have no additional effect on criteria pollutant emissions, because existing airport infrastructure and operations would continue unchanged. There are no construction activities associated with the No Action alternative and thus no new climate change—resilient features would be constructed. There would be no infrastructure upgrades under the No Action alternative, and therefore no preventative measures for the airport operations.

Proposed Action

Construction activities have the potential to generate temporary air pollution due to fugitive dust, as well as construction equipment and worker vehicle emissions. Pima County requires a Fugitive Dust Activity Permit for soil disturbing or construction activities that are one acre or greater in overall area, road construction 50 ft or greater, mechanized trenching 300 ft or greater in length, or blasting (Pima County Fugitive Dust Pre-Application Guidance, 2024). Since the total construction area for the ATCT would be 7.58 acres, a permit will be required.

Comparison to General Conformity *de minimis* thresholds are only conducted on pollutants for which the area is classified as either maintenance or nonattainment. Since the project area is in attainment for

all federal criteria pollutants except PM_{10} , a General Conformity *de minimis* analysis is only applicable for PM_{10} . The results of this analysis are presented in the table below. Data for all pollutants other than PM_{10} are for the purpose of disclosure only.

Table 3-3. Estimated Total Proposed Action Construction Emissions (tons)

Construction Emission Source	СО	NO _x	so _x	PM ₁₀	PM _{2.5}	VOCs	HAPs
Year 1 - Construction Equipment (off-road)	10.09	12.90	0.01	0.20	0.19	0.49	0.15
Year 1 - Worker and On-Road Construction Equipment Commuting	1.50	1.02	0.00	1.48	0.20	0.14	0.01
Year 1 - Equipment/Material Delivery	0.10	0.14	0.00	0.49	0.09	0.01	0.00
Year 1 - Fugitive Dust from Construction Operation	-	-	-	0.60	0.06	-	-
Total Year 1 Construction Emissions for the Proposed Action	11.69	14.06	0.02	2.76	0.54	0.64	0.15
Year 2 - Construction Equipment (off-road)	10.09	12.90	0.01	0.20	0.19	0.49	0.15
Year 2 - Worker and On-Road Construction Equipment Commuting	1.50	1.02	0.00	1.48	0.20	0.14	0.01
Year 2 - Equipment/Material Delivery	0.10	0.14	0.00	0.49	0.09	0.01	0.00
Year 2 - Fugitive Dust from Construction Operation	-	-	-	0.60	0.06	-	-
Total Year 2 Construction Emissions for the Proposed Action	11.69	14.06	0.02	2.76	0.54	0.64	0.15
De Minimis Level	N/A	N/A	N/A	100	N/A	N/A	N/A
Total Project Emissions	23.38	28.11	0.03	5.53	1.08	1.28	0.31

Operational emissions resulting from ongoing vehicular emissions and electrical demand related to employees of the new ATCT would be minimal. Only three additional federal employees are anticipated above current staffing levels; thus, increases in operational vehicular trips would be negligible.

The project meets the criteria under Item 15 (Routine Installation and Operation of Airport Navigation Aids) because it would not generate emissions exceeding *de minimis* levels, as the estimated annual construction PM_{10} emissions of 2.76 tons per year fall well below the 100 ton per year *de minimis* threshold. Project implementation would not cause pollutant concentrations to exceed NAAQS, as established by the U.S. EPA under the Clean Air Act, or increase the frequency or severity of any such existing violations.

To assess the remaining criteria pollutants for which the project area is in attainment, the Step 4 Screening Criteria from the FAA Air Quality Handbook were used to determine whether additional analysis is required. Below are the four screening parameter questions specified.

A. If the project is not in the Ozone Transport Region (OTR), will the FAA Federal Action cause an increase in all aircraft operations of more than 14,000 operations per year? If the project is in the OTR, will the FAA Federal Action cause an increase in GA aircraft operations of more than 5,000 operations per year, or an increase in all aircraft operations of more than 14,000 operations per year?

The project is not in the OTR and is not anticipated to result in any additional aircraft operations.

B. Will the FAA Federal Action cause a projected annual increase of aircraft delay exceeding 340,000 minutes?

No increase in aircraft delay is anticipated as a result of this project.

C. Will the FAA Federal Action cause an additional 25 million vehicle miles traveled (VMT) from on-road vehicles per year?

The maximum total additional VMT associated with the project is anticipated to be 1.15 million VMT per year for all construction activities which represents the worst-case scenario.

D. If the project is not in an OTR, will the FAA Federal Action result in the use of an average of more than 125 pieces of construction equipment and GSE during a year? If the project is in an OTR, will the FAA Federal Action result in the use of an average of more than 50 pieces of construction equipment and GSE during a year?

The project is not in the OTR, and the maximum average pieces of construction equipment is anticipated to be 13 during a year on a 16 hour per day annualized basis. No additional GSE is anticipated as a result of the project during the operational phase.

These Screening Parameters were then normalized by dividing by the following Screening Criteria:

In a given year, if $A' + B' + C' + D' \ge 1.0$, prepare emissions inventory.

Where:

A' = Increase in Aircraft LTO's / 14,000

B' = Increase in Aircraft Taxi/Idle/Delay (minutes) / 340,000

C' = Ground Access Vehicles (GAV) Trips (VMT) / 25,000,000

D' = Number of pieces of GSE and Construction Equipment / 125

Below are the normalized values for each Screening Parameter using peak construction activities:

A' = 0 Increase in Aircraft LTO's / 14,000 = 0

B' = 0 Increase in Aircraft Taxi/Idle/Delay (minutes) / 340,000 = 0

C' = 1,152,000 GAV Trips (VMT) / 25,000,000 = 0.046

D' = 13 pieces of Construction Equipment / 125 = 0.104

Adding these normalized values results in a sum below 1.0, therefore, an emission inventory is not required.

Table 3-4. Normalized Values for Screening Parameters

Variable	Variable Description	Project- Specific Change	Normalization
A	Aircraft Operations	No Change	0.000
В	Aircraft Taxi/Idle/Delay	No Change	0.000
С	Ground Access Vehicles	1,152,000 VMT	0.046
D	Construction Equipment	13 Pieces	0.104
Total			0.150

As the sum is well below 1.0, no further analysis was deemed necessary for the attainment criteria pollutants.

3.3 Climate

• Would the project increase greenhouse gas (GHG) emissions or change the current level of the site's preparedness to climate change?

3.3.1 Affected Environment

ANALYSIS AREA (GEOGRAPHIC AND TEMPORAL)

Climate change is a change in the average climatic conditions of the Earth, as characterized by changes in wind patterns, storms, precipitation, and temperature. Climate change is a global phenomenon that can also have local impacts. Greenhouse gases—such as water vapor, carbon dioxide (CO₂), methane, nitrous oxide, and ozone—are both naturally occurring and human-made. Research has established a direct correlation between fuel combustion and GHG emissions. GHGs from human-related sources include CO₂, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. CO₂ is a long-lived gas that remains in the atmosphere for up to 100 years (Intergovernmental Panel on Climate Change 2023:44).

The Town of Marana's 2040 General Plan (Town of Marana 2019:3-12) establishes goals for natural hazard preparedness, including flooding and droughts, and guides the Town to develop a Drought Management Plan (Town of Marana 2019:4-11). Further, the General Plan includes extensive guidance and policy for managing flooding resultant from rain events (Town of Marana 2019:3-13) and guides future projects to be resilient from future flooding (Town of Marana 2019:4-7). The Town adopted Pima County Community Wildfire Protection Plans (CWPPs) to support GHG reduction goals and establish a flexible, ongoing strategy for addressing the Town's evolving climate change needs. At the airport, implementation of the CWPP acknowledges the impacts of climate change on local fire patterns and plant communities. Pima County, in response to nationally recognized and accredited studies (e.g., Gonzalez et al. 2018, Climate Assessment for the Southwest [CLIMAS] 2024) developed a Sustainable Action Plan (Pima County 2018). The Sustainable Action Plan recognizes the risks increased heat and dryness present to Pima County residents and businesses and seeks to build cross-sector resilience to current and future climate variability.

3.3.2 Environmental Consequences

SIGNIFICANCE THRESHOLD / IMPACT INDICATOR

The FAA has not established a significance threshold for climate (FAA 2015). FAA's 1050.1F Desk Reference, Chapter 3 (FAA 2023) provides methodology for examining impacts associated with climate.

DIRECT AND INDIRECT IMPACTS

No Action

Under the No Action alternative, airport operations would remain the same. The No Action alternative would have no additional effect on GHG emissions, because existing airport infrastructure and operations would continue unchanged. There are no construction activities associated with the No Action alternative and thus no new climate change—resilient features would be constructed. There would be no infrastructure upgrades under the No Action alternative, and therefore no preventative measures to build resilience into the airport operations.

Proposed Action

The Proposed Action would not change the current operations and maintenance of the airport, would not increase the capacity of the airport, and no incremental change in GHG emissions would take place. The current operations and maintenance of the airport would continue during and after the ATCT is constructed.

The Proposed Action would not result in an incremental increase in GHG emissions during normal operations and maintenance, compared to the No Action alternative. The Proposed Action would not modify the airfield, or accommodate a greater number of, higher frequency of, or larger aircraft. In addition, aircraft demand at the airport is anticipated to remain consistent following the upgrades to existing infrastructure. Therefore, the Proposed Action is not anticipated to increase GHG emissions from airport-related activity.

GHG emissions as part of construction activities for the Proposed Action are expected to occur in 2026. The Proposed Action includes the use of construction equipment to build the proposed facilities. Emissions associated with construction activities are expected to be approximately 4,900 tons per year of CO₂ equivalent. The Town and the FAA have shown in their alternatives analysis (refer to Chapter 2) that there were no practicable alternatives that would eliminate potential GHG emissions. A summary of the anticipated construction GHG emissions is presented in the table below.

Table 3-5. Proposed Action Construction Emissions (metric tons)

Construction Emission Source	CO ₂	CH₄	N ₂ O	Total CO₂e ¹
Year 1 - Construction Equipment (off-road)	4,574	0.05	0.02	4,580
Year 1 - Worker and On-Road Construction Equipment Commuting	215.36	0.01	0.00	216.09
Year 1 - Equipment/Material Delivery	88.25	0.00	0.00	88.32
Year 1 - Fugitive Dust from Construction Operation	-	-	-	-
Total Year 1 Construction Emissions for the Proposed Action	4,878	0.05	0.02	4,885
Year 2 - Construction Equipment (off-road)	4,574	0.05	0.02	4,580
Year 2 - Worker and On-Road Construction Equipment Commuting	215.36	0.01	0.00	216.09
Year 2 - Equipment/Material Delivery	88.25	0.00	0.00	88.32
Year 2 - Fugitive Dust from Construction Operation	-	-	-	-
Total Year 2 Construction Emissions for the Proposed Action	4,878	0.05	0.02	4,885
Total Project GHGs	9,755	0.11	0.04	9,769

¹ Global warming potentials are based on IPCC AR6 Climate Change 2021: the Physical Science basis. Chapter 7.

The Proposed Action is not expected to be affected by future climate conditions and would be designed to function in extreme heat without impact from extreme drought. The ATCT would be built to incorporate heat-reflective materials and heat-tolerant materials. These risks are not new to the Town or the airport. The Town's adoption of Pima County's CWPP further reduces the effects of climate change through sustainable design and site development guidelines. Due to the nature of the Proposed Action, there are no recommended avoidance, minimization, or mitigation measures that would reduce GHG emissions.

3.4 U.S. Department of Transportation Act, Section 4(f)

• How would the presence of new infrastructure, including the new ATCT, affect Section 4(f) properties, which include significant publicly owned parks, recreation areas, and wildlife and waterfowl refuges, as well as significant historic sites?

3.4.1 Affected Environment

ANALYSIS AREA (GEOGRAPHIC AND TEMPORAL)

The analysis area established for this resource was a 3-mile radius from the project area (Figure 3-1). This analysis area provides an opportunity to identify potential Section 4(f) properties that may be directly affected by construction or indirectly affected by visual or noise impacts and is the same 3-mile viewshed as that used for analysis of both cultural resources and visual resources.

A visual resources analysis was prepared for this project and the FAA coordinated with responsible local, state, and federal resource agencies to evaluate potential impacts; those findings are incorporated and described in this EA (Appendix E and Appendix F). A cultural resources evaluation and built environment evaluation were conducted to address potential impacts to historical, architectural, archaeological, and cultural resources (see Appendix C).

Letters were mailed to the Town of Marana Parks and Recreation Department, the National Park Service (NPS), and the Juan Bautista de Anza National Historic Trail (Anza Trail or Anza NHT) representatives to request input on the presence of any known Section 4(f) properties or any specific concerns related to such properties that may result as part of project implementation. A response from NPS and Anza Trail representatives was received, and additional coordination and analysis were prepared to address concerns about potential adverse impacts to the viewshed from the Anza Trail due to the placement of a new ATCT. A summary of Section 4(f) outreach and NPS coordination is included in Appendix F. Representatives of the FAA, Town Public Works—Airport, Town Public Works—Capital Improvements Program, and the Town Parks and Recreation Department, as well as a contracted visual resources professional, visited the Anza NHT corridor on July 24, 2024. This visit included taking additional photographs at key observation point (KOP) 4 (see Appendix F).

There are no recreation areas, wildlife or waterfowl refuges, or any publicly or privately owned historic sites listed on or eligible for listing on the National Register of Historic Places in the analysis area. The FAA identified the following facilities in the analysis area that meet the definition of Section 4(f) properties (publicly owned park, open to the public and used primarily as a park) (see Figure 3-1):

- Santa Cruz River Park
- White Avenue Park
- Gladden Farms Community Park
- Ora Mae Harn District Park
- Marana Heritage River Park

The closest recreation facility is the Santa Cruz River Park, which contains a portion of the Santa Cruz River Trail (SCRT), also known as "Chuck Huckleberry Loop" or "The Loop", a 137-mile regional system of paved pathways and bike lanes. The SCRT also coincides with a section of the designated corridor of the Juan Bautista de Anza National Historic Trail.

The viewshed associated with KOP 4 is characterized by both natural and human-made features. The SCRT itself is a human-made, paved pathway on top of a soil-cement treated earthen embankment bounded with various types of fencing (post and chain, rail, and chain-link fencing). The height of the embankment varies from 3 feet to more than 10 feet tall. Vegetation along the trail is dominated by large-stature, native riparian trees and shrubs such as velvet mesquite (*Prosopis velutina*) and creosote bush (*Larrea tridentata*) as well as invasive tree species, such as tamarisk (*Tamarix ramosissima*). This vegetation screens and obscures views across the river corridor from the SCRT. Urban and industrial development along the trail to the east is prominent, and when in proximity of the trail, becomes the focus

of attention. Based on fieldwork conducted for this analysis, the existing beacon is visible from discrete locations along the Santa Cruz River Trail.

Current land use adjacent to the SCRT in the vicinity of the airport includes Agricultural, Industrial, Parks/Open Space, Public/Institutional, and Single Family Residential (Town of Marana 2019). Zoning in adjacent areas outside the floodplain includes Agriculture, Small, Medium and Large Lot zones, Single Family Residential, and Village Commercial. The SCRT corridor itself would not be developed, as it is in a floodplain and the trail itself is located within designated Parks/Open Space. However, projected future land use outside the floodplain would be primarily Industrial and a mix of residential uses (see Section 3.5, Land Use). The Town's Industrial designation provides for a mix of light and heavy industrial uses, employment centers, offices, research and development facilities, and mining infrastructure, such as the facilities visible in the viewpoint photographs (see Appendix E, KOP 4 Simulation).

Regulatory Context

Section 4(f) of the U.S. Department of Transportation Act protects significant publicly owned parks, recreation areas, and wildlife and waterfowl refuges, as well as significant historic sites.

The following may constitute a significant impact:

- Physical Use: Section 4(f) use would occur if the Proposed Action or alternative(s) would involve an actual physical taking of Section 4(f) property through purchase of land or a permanent easement, physical occupation of a portion or all the property, or alteration of structures or facilities on the property. In some cases, a temporary occupancy could be considered physical use of a property.
- Constructive Use: Impacts of the Proposed Action or alternative(s) on a Section 4(f) property are so severe that the activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially diminished.

⁴ According to the 2040 General Plan (Town of Marana 2019:2-19), the 2010 Future Land Use Map (Attachment C) "guides the built environment by illustrating the type and location of permitted land uses. The land use types are described through the Future Land Use Categories. The 2010 FLUM represents the collective vision of Town leaders and residents and will continue to guide development decisions until the Make Marana 2040 General Plan is ratified." The 2040 General Plan was ratified on August 4, 2024.

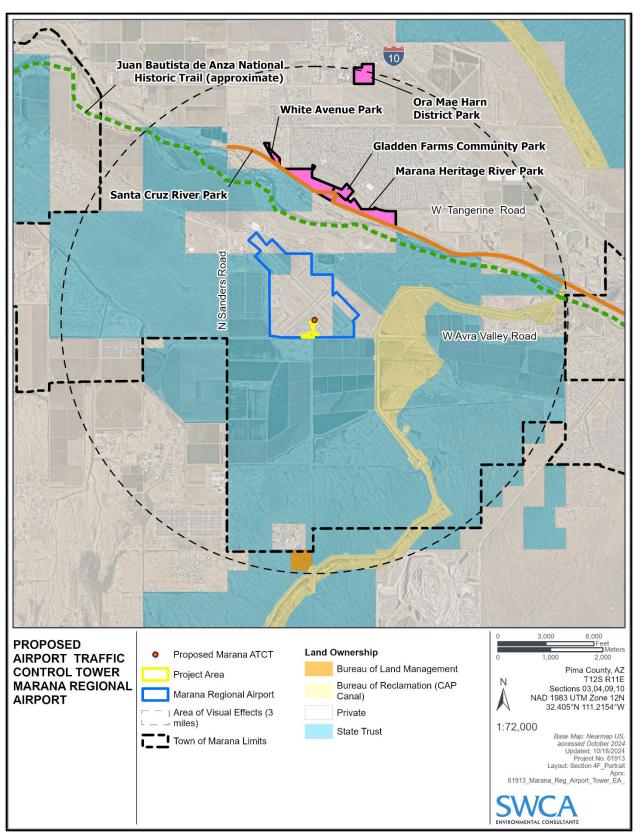


Figure 3-1. Section 4(f) resources in proximity to Marana Regional Airport.

3.4.2 Environmental Consequences

SIGNIFICANCE THRESHOLD / IMPACT INDICATOR

The FAA has established a significance threshold for impacts to Section 4(f) resources (FAA Order 1050.1F Exhibit 4-1:4-6).

• The action involves more than a minimal physical use of a Section 4(f) resource or constitutes a "constructive use" based on an FAA determination that the aviation project would substantially impair the Section 4(f) resource. Resources that are protected by Section 4(f) are publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance; and publicly or privately owned land from a historic site of national, state, or local significance. Substantial impairment occurs when the activities, features, or attributes of the resource that contribute to its significance or enjoyment are substantially diminished.

DIRECT AND INDIRECT IMPACTS

No Action

The No Action alternative would have no effect on Section 4(f) resources because all airport components would stay in their current state. Visitors to parks in the analysis area would not experience changes from current conditions as airport operations would not change. The No Action alternative would not result in a physical use of Section 4(f) properties or substantial impairment of the activities, features, or attributes of a resource that contribute to the significance of a Section 4(f) resource.

Proposed Action

The ATCT would be visible 1.5 miles from the Santa Cruz River Trail (see KOP 4 simulations, Appendix E). Construction of the Proposed Action would place a new structure (123-foot-tall ATCT) that would be visible from nearby recreational facilities, such as the SCRT.

The proposed 123-foot-tall ATCT would be visible during the day from the SCRT. Views may be direct or may occasionally be obstructed by the surrounding vegetation. The new ATCT is not anticipated to be the focus of attention of the SCRT users. The built features which currently exist, including the developed SCRT and the industrial development associated with aggregate mining facilities, would be the most prominent visible features, in contrast to the ATCT.

Construction of the Proposed Action would place a new structure (123-foot-tall ATCT) that would be visible from nearby recreational facilities, such as the Santa Cruz River Trail. Based on fieldwork conducted for this analysis, the existing beacon is visible from locations along West Avra Valley Road, portions of North Sanders Road, and discrete locations along the Santa Cruz River Trail. The relocated airport beacon light would be visible from those sections of trail that have a line of sight to the ATCT (SWCA Environmental Consultants 2024). The SCRT is open for nighttime use. The brightness and steady horizontal rotation of the beacon light would be visible by nighttime users of the SCRT, from a distance of 1.5 miles. The view of the beacon would be frequently screened by vegetation and seen alongside the collective night lighting of the industrial, residential, and commercial developments directly adjacent to the trail corridor. For these reasons, the recreational experience of nighttime users of the SCRT is not expected to be impaired by the ATCT beacon light.

The nearest Section 4(f) resource, the Santa Cruz River Trail, is located approximately 1.5 miles from the Proposed Action. Construction equipment noise would be short term (limited to construction) and construction-related noise would not be perceptible over other ambient noise from the SCRT. The noise

from project operations would not exceed current noise levels. For these reasons, no noise impacts to Section 4(f) resources are anticipated.

The Proposed Action would not result in a physical use of Section 4(f) properties or substantial impairment of the activities, features, or attributes of a resource that contribute to the significance of a Section 4(f) resource. Therefore, no significant impact would occur. No avoidance, minimization, or mitigation measures are required for this impact category.

3.5 Land Use

- How would implementation of the project affect land use in the project area and vicinity, including land use compatibility?
- How do planned land use changes contribute to the context and intensity of the proposed project's potential visual impacts?

3.5.1 Affected Environment

ANALYSIS AREA (GEOGRAPHIC AND TEMPORAL)

The analysis area used to evaluate this resource was a 3-mile radius from the project area. This area encompasses land use in the surrounding vicinity and mirrors the analysis area for most other resources.

The Proposed Action is located within the boundaries of an existing airport and aligns with future development as outlined in the approved Airport Master Plan (Town of Marana 2017) and within the approved Airport Layout Plan. The Town of Marana's 2040 General Plan (Town of Marana 2019: Figure 2-2:2-12) designates Marana Regional Airport and the surrounding land as part of the West Growth Area, which is largely undeveloped Arizona State Land Department (ASLD) property but is under an avigation easement to support airport operations. The 2040 General Plan identifies five growth areas that are particularly suitable for planned multi-modal transportation and infrastructure expansion and improvements designed to support a planned concentration of a variety of uses, such as residential, office, commercial, tourism and industrial uses, including the West Growth Area that overlaps the existing airport. The designated and future use of the project area is dedicated to airport operations, with the West Growth Area expected to evolve into an employment hub associated with the airport (Figure 3-2). Other planned land uses in the analysis area include Commercial, Employment, the I-10 corridor, Low Density Residential, Master Planned Area, Open Space Rural Residential, and Traditional Neighborhood (see Figure 3-2). Designated and future land uses contribute to the analysis area's variety in visual character: employment-associated development and master planned areas are interspersed with undeveloped buffer areas such as open desert and agricultural fields, providing visual separation of land uses dissimilar in nature (Town of Marana 2019). See Section 3.6 for detailed analysis.

Regulatory Context

The FAA considers potential impacts of a proposed action on its compatibility with land use adjacent to or in the vicinity of the proposed action, primarily as a result of the Airport and Airway Improvement Act and the Airport Development Grant Program.

3.5.2 Environmental Consequences

SIGNIFICANCE THRESHOLD / IMPACT INDICATOR

The FAA has not established significance thresholds for land use (FAA Order 1050.1F Exhibit 4-1:4-8). There are no specific independent factors to consider for land use. The determination that significant impacts exist in the Land Use impact category is normally dependent on the significance of other impacts.

DIRECT AND INDIRECT IMPACTS

No Action

The No Action alternative would result in no change to the compatibility between the airport and existing land use.

Proposed Action

The Proposed Action would not require any property acquisition or involve improvements outside the airport property boundary. The permanent improvements under the Proposed Action are within the actively managed airfield, aprons, and fenced perimeter on existing airport property. Local planning supports airport improvements such as the Proposed Action. Construction of the new ATCT and auxiliary infrastructure is aligned with the 2019 Town of Marana's 2040 General Plan and Western Growth Area uses, as well as the approved 2017 *Marana Regional Airport Master Plan*, and are consistent with the airport layout plan (Town of Marana 2017). Development of the Proposed Action would support airport safety and efficiency. The Proposed Action is not anticipated to cause any compatibility-based conflicts with the Town of Marana 2040 General Plan. The addition of an ATCT to the analysis area, while a change to the visual character and subject to project mitigation (see Section 3.6.2), would not result in new or non-conforming land use in the analysis area (both on-airport and off-airport).

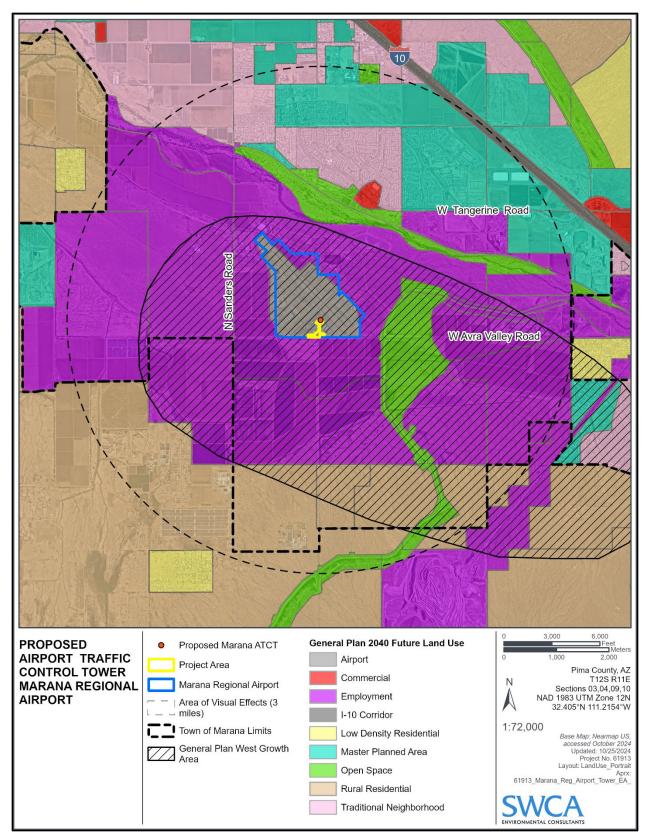


Figure 3-2. Town of Marana future land use.

3.6 Visual Effects

• How would the presence of new infrastructure, including the new ATCT, affect the viewshed of the surrounding area, including relocating light sources?

3.6.1 Affected Environment

ANALYSIS AREA (GEOGRAPHIC AND TEMPORAL)

The analysis area for visual effects is a distance of 3 miles from the ATCT, which is based on the proposed height of the ATCT, and views from a variety of surrounding locations and contexts. This analysis consisted of the following steps:

- 1) identify and describe the existing visual character surrounding the airport, including important and valued visual resources.
- 2) select critical and typical viewpoints, referred to as key observation points (KOPs), which are locations where the Proposed Action may be visible from publicly accessible and/or visually valued areas,
- 3) develop photo-realistic simulations representing the Proposed Action as it would appear from the selected KOPs, and
- 4) based on the results of the photo simulations, evaluate potential impacts to views as a result of the Proposed Action, considering both effects on visual character and the effect of light emissions.

VISUAL RESOURCES / VISUAL CHARACTER

The airport and Proposed Action are geographically within the Arizona Upland/Eastern Sonoran Basin ecoregion, characterized by broad, open plains situated between the higher-relief mountain ranges of the Eastern Sonoran Mountains (U.S. Environmental Protection Agency 2013). Vegetation within this area is uniformly scattered throughout undeveloped areas; vegetation types include creosote bush and bursage (*Ambrosia* sp.), with foothills palo verde and desert ironwood also present (Griffith et al. 2014), providing light and dark green patches over the brown and tan soils on the surface. When present, the natural vegetation can screen outward views from roadways and pedestrian areas. The narrowly braided channel of the Santa Cruz River, lined with concentrated vegetation, runs west through the landscape north of the airport. The landscape around the airport is rural, with large areas of undeveloped lands administered by the ASLD and agricultural fields, appearing as flat, continuous, and sometimes grid-like visual character. These lands contrast to developed areas and agriculture fields. The undeveloped nature of ASLD lands in the analysis area (rights-of-way and leases notwithstanding) provide views with natural vegetation and unique aesthetic value, and may offer unobstructed views.

The nearest residences are 1.2 miles northwest of the Proposed Action, and an extensive residential development, a master planned community, is also at least 1.6 miles northeast of the Proposed Action, including the Gladden Farms neighborhood. Prominent visual features within the airport include existing beacon and airfield lights, numerous large rectangular hangars, a terminal building, exterior auto and aircraft parking areas, maintenance yards, and fuel tanks.

Important or visually valued resources identified as having potential views of the Proposed Action include the Santa Cruz River Trail, a paved, off-street bicycle and pedestrian trail amenity located north of and parallel to the Santa Cruz River. Notably, the improved SCRT within the town of Marana follows the recognized alignment of the Juan Bautista de Anza National Historic Trail, the 1,200-mile route of an

eighteenth-century expedition from Sonora, Mexico, to San Francisco, California (National Park Service 2020).

The KOPs represent views of the Proposed Action by people using identified important sites and recreational areas, views from the nearest residential areas, and typical views from vehicles traveling along major roadways where the Proposed Action would be seen (Table 3-6). Photographs depicting views of the Proposed Action from each KOP are presented in the visual character analysis in Appendix E (see Appendix E: Attachment A).

Table 3-6. Identified Key Observation Points

KOP Number	Location	Distance to Proposed Action (miles)	View Direction	Area of Resource KOP Represents
1	West Avra Valley Road at Sandario Road	0.23	North	Typical foreground view from the major roadway intersection nearest to the Proposed Action
2	West Avra Valley Road	0.42	West	Typical west-facing view from roadway adjacent to the airport and proposed ATCT location
3	North Sanders Road	1.23	Southeast	Rural-residential area nearest to the Proposed Action
4	Santa Cruz River Trail	1.46	Southwest	The Santa Cruz River Trail and residential areas northwest of the Proposed Action. Within Marana and continuing south through Tucson, the Santa Cruz River Trail is part of a larger locally improved multiuse path that follows the alignment of the 1,200-mile federally designated Juan Bautista de Anza NHT.

Light Emissions

The airport and its surroundings are illuminated by various types of lighting, mainly used for safety and security of airport operations and/or nighttime use of airport facilities. The airport has approach lights, terminal area pedestrian and site lighting (such as parking lot lights and exterior and interior building lighting), runway and taxiway lighting including illuminated signage, and obstruction lighting. Many buildings within the airport, including the hangars, have bright exterior lighting affixed at the roof peak and at access doors. Additionally, the airport has a rotating beacon (height of 51 feet) affixed to a steel lattice ATCT located northeast of the terminal. In accordance with aviation standards, the beacon consists of two oppositely oriented lamps, one white-colored and one green. Based on fieldwork conducted for this analysis, the existing beacon is visible from locations along West Avra Valley Road, portions of North Sanders Road, and discrete locations along the Santa Cruz River Trail. Outside of the airport, intermittent overhead street lighting was observed along West Avra Valley Road at intersections with other major roadways, such as North Sandario Road, North Sanders Road, and others within the project area.

Regulatory Context

The Town does not specifically manage for visual resources; however, Open Space land use assigned by the Town's 2040 General Plan (Town of Marana 2019: Figure 4-1:4-4) is within the analysis area, including the Santa Cruz River and the Central Arizona Project canal (see Figure 3-2). The 2040 General Plan recognizes the significance of the Santa Cruz River to the community, both environmentally and socially. The goals and policies of the Open Space Element help guide the Town's efforts, along with similar local and regional efforts, to rehabilitate and enhance the integrity of Open Space areas.

The ASLD does not manage specifically for visual resources. ASLD's regulations found at Arizona Revised Statutes Title 37, Chapter 2, Article 4.2, Section 37-311 define open space as land that is generally free of land uses that would jeopardize the conservation and open space values of the land or development that would obstruct the scenic beauty of the land.

3.6.2 Environmental Consequences

SIGNIFICANCE THRESHOLD / IMPACT INDICATOR – VISUAL CHARACTER AND LIGHTING

The FAA has not established a significance threshold for visual effects (FAA 1050.1F Exhibit 1-4:4-10). The factors to consider for this analysis are the degree or extent to which the project would have the potential to affect the following:

Lighting—The degree to which the action would have the potential to:

- create annoyance or interfere with normal activities from light emissions; and
- affect the visual character of the area due to the light emissions, including the importance, uniqueness, and aesthetic value of the affected visual resources.

Visual Resources / Visual Character—The extent the action would have the potential to:

- affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources;
- contrast with the visual resources and/or visual character in the study area; and
- block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations.

DIRECT AND INDIRECT IMPACTS

No Action

Under the No Action alternative, there would be no impacts to the analysis area's visual character and no new light emissions. There would be no change to the existing visual character or lighting. Therefore, no visual effects would result from the No Action alternative.

Proposed Action

Visual Character

The Proposed Action would affect but not change the visual character, and would not present strong contrasts to the analysis area. No views would be blocked as a result of the Proposed Action; in the views from certain areas and KOPs, the Proposed Action would be visible. Photo simulations (photographic data, baseline photo, and simulated photo) depicting views of the Proposed Action from each KOP are presented in the visual character analysis in Attachment A of Appendix E. Photo simulations are presented below in Figure 3-3 through Figure 3-7. Impacts to KOP views resulting from the Proposed Action are listed in Table 3-7.

Table 3-7. Effects on Views at KOPs

KOP Number	Description of Effects
1* (Daytime)	Facing north from West Avra Valley Road at North Sandario Road, the proposed ATCT would be noticeable to viewers because it would be the tallest structure in the foreground of the view. However, the proposed ATCT is visually compatible with the existing airport hangars. The colors, textures, lines, and forms of the project are similar to the neighboring airport structures; therefore, visual contrast introduced by the project is weak. Visual character of the view from KOP 1 is not adversely altered, and the project does not block or obstruct visual resources.
1* (Nighttime)	This view represents the typical north-facing nighttime appearance of the airport from the project. As shown in the photo simulation, interior stairwell lights (required for user safety) within the shaft of the ATCT are seen as a column of small and softly illuminated rectangles. Additionally, the rotating beacon light (represented in the photo simulation at the point in time when the green lamp faces the viewer) would attract attention in the view from KOP 1, due to its prominent height on top of the ATCT and its rotation, which is perceived by the viewer as a blinking light alternating green and white in color. However, as shown in the existing photo in Attachment A, the beacon is a prominent existing illumination feature within the airport; therefore, the project does not significantly alter existing views from West Avra Valley Road or introduce additional visual contrast as a result of the relocated beacon.
2	KOP 2 represents the view facing northwest showing the airport as seen from West Avra Valley Road. The project would be briefly noticeable to travelers on West Avra Valley Road because a full line of sight to the ATCT occurs at this KOP location; no intervening structures or vegetation obscure the view. In the context of the visible hangars and development within the airport, the ATCT is compatible with the visual character and presents weak contrast. The project does not block or obstruct visual resources.
3	KOP 3 represents the view facing southeast toward the ATCT from a loose cluster of rural residential properties located off North Sanders Road. As shown in the photo simulation, the ATCT is visible, but it does not attract attention due to the viewing distance (1.23 miles) and intervening vegetation. As seen from KOP 3, the existing visual character is maintained, and the project presents negligible visual contrast. The project does not block or obstruct visual resources.
4	KOP 4 represents the view facing southwest from an off-street segment of the Santa Cruz River Trail. As shown in the photo simulation, the ATCT is visible, but is visually absorbed by the landscape due to the viewing distance (1.46 miles) and dense, mixed vegetation between the viewer and the ATCT. As seen from KOP 4, which represents views toward the project from the Santa Cruz River Trail and corresponding Juan Bautista de Anza NHT, the visual character of the landscape is maintained, and visual contrast presented by the project is negligible. Fieldwork conducted for this analysis demonstrated that concentrated vegetation along the Santa Cruz River between the Trail and the project would frequently screen direct views of the ATCT from users on the SCRT. Other potential viewpoints along the Santa Cruz River Trail identified for this analysis and visited during fieldwork determined that vegetation blocked views of the ATCT. Where it is visible, the project does not block or obstruct visual resources.

Source: SWCA Environmental Consultants (2024:Table 2).

Based on the results of the photo simulations and determinations presented in Table 3-7, the Proposed Action would alter, contrast with, or obstruct existing views at KOP 4 along the SCRT. The Town is coordinating with the NPS regarding development and installation of an interpretive sign panel along the SCRT to provide trail users with information associated with the Anza NHT as well as the historical evolution of the landscape to present day. The additional information to users from the installation of an interpretive sign on the SCRT would provide mitigation for the potential changes to the visual character at KOP 4 and the SCRT. See Section 3.4 above for additional analysis on SCRT impacts and Section 3.8 below for a discussion on required mitigation. Information regarding the proposed sign is included in Appendix F.

^{*} Photo simulations representing views from KOP 1 were created for midday and nighttime conditions.

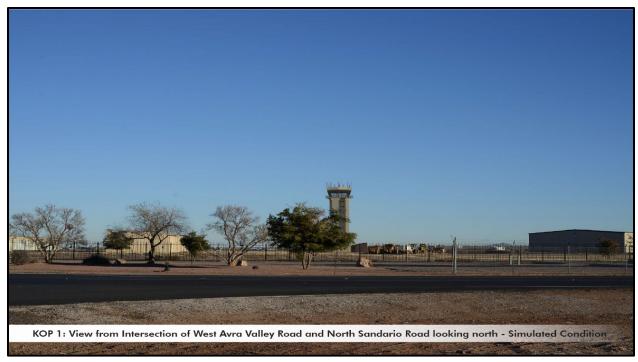


Figure 3-3. Simulation – KOP 1 (daytime).



Figure 3-4. Simulation – KOP 1 (nighttime).



Figure 3-5. Simulation – KOP 2.



Figure 3-6. Simulation – KOP 3.



Figure 3-7. Simulation - KOP 4.

Light Emissions

The Proposed Action, which entails relocating the existing airport beacon light from its current location on a 50-foot-tall tower to the top of the 123-foot-tall ATCT, as represented in the photo simulations Figure 3-3 through Figure 3-7 (see also Appendix E, Attachment A for additional details). Similar to existing conditions, the rotating beacon would be intermittently visible from areas surrounding the airport, including portions of West Avra Valley Road to the south, North Sanders Road to the west, and isolated locations northwest of the Proposed Action. The beacon would have the same brightness and motion to the existing beacon but would be positioned at a higher altitude (approximately 120 feet high on top of the ATCT) and as a result, the beacon would be visible from more locations within the analysis area. However, the higher position of the beacon, in combination with its lamp angle (approximately 5 degrees above horizontal), would result in the beacon light being above and directed upward as seen by most viewers, meaning the light would not be directly oriented toward viewers on the ground. For this reason and considering the existing presence and visibility of the beacon light in combination with the distance from the beacon to the nearest residential or recreational areas (at least 1.23 miles), the Proposed Action would not interfere with normal activities due to light emissions.

The Proposed Action would affect but not change the visual character and would not present strong contrasts to the analysis area. No views would be blocked as a result of the Proposed Action; in the views from certain areas and KOPs, the Proposed Action would be visible. Mitigation was established in coordination with the National Park Service to provide interpretive signage in an area along the SCRT where the Proposed Action would be visible (Appendix F). The Proposed Action would not interfere with normal activities due to light emissions, and lighting from the Proposed Action would not change the visual character.

3.7 Water Resources (Floodplains and Surface Waters)

- How would the presence of new infrastructure, including the new ATCT, affect floodplain values?
- How would the presence of new infrastructure, including the new ATCT, affect surface water quality?

3.7.1 Affected Environment

ANALYSIS AREA (GEOGRAPHIC AND TEMPORAL)

The analysis area used to evaluate this resource was a 3-mile radius from the project area. This area encompasses land use in the surrounding vicinity and mirrors the analysis area for most other resources and allows the evaluation to consider the specific conditions within the airport boundaries, as well as the influence of the Santa Cruz River, located to the north of the project area.

A review of the Federal Emergency Management Agency's (FEMA) floodplain mapping indicates that the project was subject to a Letter of Map Revision (LOMR) (FEMA LOMR 20-09-0784P, effective April 5, 2021). Prior to the LOMR, the entire airport property was considered within the 100-year floodplain (FEMA 04019C1040L, June 16, 2011); however, the LOMR takes into account the presence of levees along the Santa Cruz River and indicates that the majority of the airport property is not subject to an annual 1% chance of flooding. Small pockets within the airport boundaries are still shown as subject to intermittent flooding, however none of these areas are within the project area. The project would not place new infrastructure within the 100-year floodplain; see Appendix G.

The project would result in ground disturbance and will require compliance with Section 401 of the Clean Water Act (CWA). Section 303(d) of the CWA requires States to identify waterbodies, known as impaired waters, which do not meet water quality standards. Impacts to water quality standards and total maximum daily loads of pollutants for impaired waters determine a project's potential impact to water quality. The analysis area is located within the Lower Santa Cruz River Basin. Water from the Santa Cruz River is within the State's Tucson Active Management Area (TAMA), which covers 3,866 square miles in southern Arizona. Municipal use comprises the greatest portion of water demand in the TAMA, followed by agriculture. The remaining industrial demand is primarily due to mining. In 1993, the Central Arizona Project began delivering Colorado River water to Pima County, including to Marana and Tucson. The Santa Cruz River is considered an "impaired" water under the CWA as of the Arizona Department of Environmental's (ADEQ's) 2024 water quality Integrated Report (Arizona Department of Environmental Quality 2024: Impaired Waters List Appendix).

Regulatory Context

Federal agencies are required to avoid, to the extent possible, the long- and short-term⁵ adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.⁶ Section 404 of the CWA regulates discharges of dredged or fill material into wetlands and waterbodies classified as waters of the U.S. Sections 401 and 402 of the CWA provide protections for surface water quality by regulating pollutant discharge into waters of the U.S. Section 401 provides for state review of federal CWA permits, including

⁵ In general, short-term impacts are those that would occur only during the time required for construction or installation activities (e.g., 11 months or less). Long-term impacts are those that are more likely to be persistent during operation and maintenance (e.g., 11 months or longer).

⁶ Executive Order 11988, Floodplain Management, 1977.

wetland permits issued under Section 404. Section 402 regulates pollutant discharges into waters of the U.S. from point sources through issuance of permits through the ADEQ-administered Arizona Pollutant Discharge Elimination System (AZPDES).

3.7.2 Environmental Consequences

SIGNIFICANCE THRESHOLD / IMPACT INDICATOR

The FAA has established one significance threshold for floodplains (FAA 1050.1F Exhibit 1-4:4-11). Adverse effects on any the following may constitute a significant impact:

The action would cause notable adverse impacts on natural and beneficial floodplain values.

The FAA has established two quantitative significance thresholds for impacts to surface water quality. Adverse effects on any of the following may constitute a significant impact:

- Exceed water quality standards established by federal, state, local, and tribal regulatory agencies.
- Contaminate public drinking water supply such that public health may be adversely affected.

DIRECT AND INDIRECT IMPACTS

No Action

Under the No Action alternative, there would be no change to the floodplain's values or surface water quality. Therefore, no significant effects would result from the No Action alternative.

Proposed Action

The Proposed Action would not result in impacts to existing floodplains as the project avoids placing new infrastructure within the 100-year floodplain and there would not be a change in the floodplain values.

The Proposed Action involves 0.9 acre of permanent disturbance and 7.58 acres temporary construction disturbance. Both disturbances are located within previously disturbed impervious and semi-impervious surfaces consisting of compacted structural fill. The concentration of stormwater runoff is not expected to change. Water runoff in the project area would continue to infiltrate existing storm drains. The capacity of storm drains is sufficient to handle post-construction water runoff and the drainage system is not connected to the Santa Cruz River.

The sponsor will prepare a Stormwater Pollution Prevention Plan and file a Notice of Intent with the ADEQ under the Construction General Permit portion of their AZPDES permitting program (see Table 3-8). All requirements of AZPDES will be followed until the project is completed. Operational stormwater is managed in accordance with the Town's Stormwater Ordinance. With these measures and implementation of construction best management practices, the Proposed Action would not exceed water quality standards or contaminate public water supply.

3.8 Avoidance, Minimization, and Mitigation Measures

The Proposed Action's design and construction specifications will include measures and commitments to avoid, minimize, or mitigate potential or likely adverse environmental effects. Table 3-8 lists specific Environmental Impact Category design guidelines, operating procedures, best management practices, and/or measures. For those resources not listed in Table 3-8, no measures are recommended.

Table 3-8. Avoidance, Minimization and Mitigation Measures

Environmental Impact Category	Description of Avoidance or Minimization Measure	Description of Mitigation Measure
Air Quality	Appropriate best management practices such as watering, stabilizing construction entrances/exits, and stabilizing disturbed ground in accordance with Marana Regional Airport, Pima County, and Town of Marana dust control requirements will be implemented by the sponsor to maintain air quality.	
Biological Resources	If burrowing owls are encountered during project construction, the sponsor shall follow Arizona Game and Fish Department guidelines in accordance with the Burrowing Owl Project Clearance Protocols (Arizona Burrowing Owl Working Group 2009). If vegetation clearing will occur during the migratory bird breeding season (March 1–August 31), the sponsor shall avoid any active bird nests. If Sonoran desert tortoise are encountered during project construction, the sponsor shall follow the Arizona Game and Fish Department Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects (see Appendix B). Protection measures to reduce the potential introduction and spread of noxious weeds shall be implemented during construction. To reduce or eliminate the potential to introduce or spread noxious or invasive plants, equipment shall be cleaned prior to and following mobilizing to the project area.	Any burrowing owl encounters and related mitigation measures taken by the sponsor shall be documented and reported to the Arizona Game and Fish Department within 30 days. If the migratory bird active nests cannot be avoided, the sponsor shall notify the FAA to evaluate the situation. During the non-breeding season (September 1—February 28), vegetation removal is not subject to this restriction.
Hazardous Materials and Solid Waste	The sponsor will comply with all hazard communication and hazardous material laws and regulations regarding these chemicals. They will also adhere to the Marana Regional Airport Emergency Plan (Town of Marana 2024a), which provides guidance for implementation of spill prevention, control, and countermeasures to minimize the leaks of motor oils, hydraulic fluids, and fuels and response to emergency situations. In addition, the Town will comply with all applicable federal and state regulations regarding notices to federal and local emergency response authorities and development of applicable emergency response plans, if required.	
Water Resources (Surface Waters)	The sponsor will prepare a Stormwater Pollution Prevention Plan and file a Notice of Intent with the ADEQ under the Construction General Permit portion of their AZPDES permitting program. All requirements of AZPDES will be followed until the project is completed.	
Historical, Architectural, Archaeological, and Cultural Resources	If an unknown cultural resource or an unidentified impact to a known cultural resource is encountered during the undertaking, then the sponsor will direct the construction contractor to immediately stop work within 100 feet of the discovery, secure the area, and arrange for a qualified professional to evaluate it and make treatment recommendations. The sponsor will notify the FAA and the Arizona State Historic Preservation Office. The sponsor will also notify the Arizona State Museum if the discovery involves human remains. The sponsor will not allow work to resume in the discovery area until notified by the FAA and in case of human remains, the Arizona State Museum as well.	
Visual Effects		The sponsor will develop and install an interpretive sign panel along the SCRT in collaboration with the NPS, which is intended to provide trail users with information associated with the Anza NHT as well as the historical evolution of the landscape to present day. The sign will be installed during or prior to construction of the new ATCT.

3.9 Cumulative Impacts

Cumulative environmental impacts are those which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over time. Cumulative effects analysis considers only those resources experiencing a permanent adverse direct or indirect impact resulting from the Proposed Action.

The Proposed Action is the only alternative addressed for cumulative effects. Because the No Action alternative would not add any new impacts to any of the resources identified in the analysis area, there would be no incremental contribution to cumulative impacts to resources in the region.

3.9.1 Past, Present, and Reasonably Foreseeable Future Actions

The airport was built during World War II and repurposed into a public airport in 1974; the Town purchased the airport in 1999 (Town of Marana 2017). Since then, there have been multiple facility expansion and development projects undertaken within the airport's controlled area as well as actions within the analysis area outside the airport (RTA 2023; Town of Marana 2024b, 2024c). Table 3-9 lists past projects by year and Table 3-10 lists projected future projects.

Table 3-9. Past Projects

Year	Description of Past Project (Phase)
2006	Rehabilitation Design of Runway 03-21, Taxiway A, E, and others; Construct Taxiway E Apron and Access Road
2007–2022	ATCT design-only
2008	Construct security fence and gates
2008	Reconstruct and expand South Apron
2008	Land Acquisition for 90-acres
2015	Airport Master Plan Update
2015	Runway/Taxiway Guidance Sign Replacement and Taxiway In-pavement Light Replacement
2022	Avra Valley Road improvements: greenway, pathway, bikeway, sidewalks (RTA)
2022	Gladden Farms: greenway, pathway, bikeway, sidewalks (Marana)
2024	East Hangar Apron Reconstruction Project, Phase 1 and 2, replace all asphalt and improve drainage (Marana)
2024	Gladden Farms Community Park ball field improvements (Marana)
2024	Santa Cruz Shared Use Path at CalPortland (Marana)
2024	Automated Weather Observation System Replacement Project (Marana)
2024	Reconstruction Design of portions of the Airport's West Hangar aprons to improve drainage (Marana)

Table 3-10. Future Projects

Project Description (Entity/Funding)
Tangerine and I-10 Interim, Marana Road/I-10 – traffic interchange improvements (Marana)
Cortaro Road/I-10, Moore Road/1-10, Tangerine/I-10 TI reconstruction – traffic interchange improvements (Marana)
Tortolita, Pinal Airpark Road/I-10, Marana Road I-19, Avra Valley Road/I-10 – traffic interchange improvements (Marana)

Project Description (Entity/Funding)

I-10 Frontage Roads: Tangerine to Avra Valley Road – frontage road improvements (Marana)

Runway 12-30 Pavement rehabilitation – Capital Improvements, Airport (Marana)

2025 Capital Improvement Program Airport Projects: ATCT Design, Taxiway C Reconstruction Design, Runway 30 Safety Area Mitigation /Obstruction Environmental & Design; Taxiway A Rehabilitation Design, Taxiway A Lighting Rehabilitation Design (Marana)

2026 Capital Improvement Program Airport Projects: ATCT Construction, Runway 30 Safety Area Mitigation/Obstruction Removal Phase 1 & 2 Construction, Airport Master Plan Update (Marana)

2027 Capital Improvement Program Airport Projects: Taxiway C Reconstruction Construction, Airport Drainage Master Plan, Airport Security Fence Design & Construction, West Hangar Apron Reconstruction Phase 1 Construction (Marana)

3.9.2 Cumulative Effects of the Proposed Action

The Proposed Action has minimal permanent or temporary impacts on environmental resources. Taken together, the Proposed Action would not add incremental change to environmental resources when combined with past, present, and reasonably foreseeable future actions.

AIR QUALITY

The Proposed Action, in combination with other projects, would not result in significant incremental cumulative impacts to air quality. The Proposed Action would have the potential to generate temporary air pollution due to fugitive dust and vehicle emissions during construction. Operational emissions resulting from ongoing vehicular emissions and electrical demand related to employees of the new ATCT would be minimal. A Pima County Fugitive Dust Activity Permit would be required to reduce fugitive dust generation during construction. The project would not generate emissions exceeding *de minimis* levels, as the estimated annual construction PM₁₀ would not cause pollutant concentrations to exceed NAAQS, as established by the U.S. EPA under the Clean Air Act, or increase the frequency or severity of any such existing violations.

CLIMATE

The Proposed Action, in combination with other projects, would not result in significant incremental cumulative impacts to climate or the airport's preparedness for climate change. The Proposed Action would contribute temporary GHGs during construction and minimal amounts of GHGs during operations. All projects are required to be constructed to a building code that incorporates energy efficiency measures, which also reduces the generation of related GHGs.

DEPARTMENT OF TRANSPORTATION ACT, SECTION 4(F)

The Proposed Action would not use Section 4(f) resources; thus, the Proposed Action, in combination with other projects, would not result in incremental cumulative impacts to Section 4(f) resources. Most of the other cumulative actions considered in this EA would not use Section 4(f) properties (e.g., transportation or roadway improvement projects) or would also be on airport property and would not have a physical or constructive use of nearby parks or other recreational uses.

LAND USE

The Proposed Action, in combination with other cumulative actions, supports airport safety and efficiency as well as solves community needs for infrastructure in compliance with the Town's General Plan as well as the Town's Airport Master Plan.

VISUAL EFFECTS

The Proposed Action, in combination with other cumulative actions, would not result in changes to the characteristic landscape or visual character of the area, either during the daytime or nighttime (due to light emissions). The Proposed Action would not interfere with normal activities due to light emissions and would not be expected to adversely affect the visual character of the area, including the importance, uniqueness, and aesthetic value of the area; thus, no significant incremental cumulative impacts to visual resources would result from the Proposed Action.

WATER RESOURCES (FLOODPLAINS AND SURFACE WATERS)

The Proposed Action's surface disturbances, when combined with the cumulative actions, is not expected to result in incremental impacts to floodplain and surface water resources, as any concentration of stormwater runoff is not expected to change. Runoff from the project, when combined with other cumulative actions, would infiltrate existing storm drains and flow into natural drainages and washes without exceeding their capacity.

4 COORDINATION AND PUBLIC INVOLVEMENT

4.1 Agency and Public Scoping Process

Prior to the onset of this EA, letters were sent to resource agencies, local jurisdictions, tribal governments, and other airport stakeholders seeking input regarding potential environmental resources that could be impacted by the Proposed Action. A list of the agencies contacted, a copy of the information sent, and the responses received are included in Appendix H.

Responses to the scoping materials were received from the following agencies:

- Arizona Department of Transportation—Would like to continue to receive project information via email; provided information regarding the recently completed East Hangar Apron Reconstruction and the upcoming State Aviation System Plan.
- Arizona Game and Fish Department—Does not anticipate significant adverse impacts to wildlife resources as the Proposed Action is located in a previously disturbed area on the airport, with the present habitat providing relatively low value to wildlife.
- Bureau of Land Management—Stated there are no comments, and no additional information is needed.
- Central Arizona Water Conservation District/Central Arizona Project—Does not believe that the Proposed Action will have any impacts to the District and its operations and maintenance of the Central Arizona Project.
- Northwest Fire District—Would like to provide input on Fire Code Requirements; would like to continue to receive project information via email and be considered a Cooperating Agency.
- Pascua Yaqui Tribe—Would like to continue to receive project information via email; since the Yoeme Pueblo Yaqui community is located just within the 3-mile viewshed, consultation with community members might be appropriate; concern that NEPA analysis will ensure that heritage resources are not adversely affected by the Proposed Action.
 - In January 2025, the Town called the community to provide a project update and provide an opportunity for further comment. No additional comments were received (personal communication, Greg Sendlak, Town of Manana, to Felipe Molina, Yoeme Pueblo Community Representative, January 30, 2025).
- Salt River Pima-Maricopa Indian Community—Reviewed the consultation letter and has no comments at this time; defers to the Tohono O'odham Nation Tribal Historic Preservation Officer as lead in the consultation process.
- Marana Police Department—Would like to continue to receive project information via email and would like to be considered a Cooperating Agency.
- White Mountain Apache Tribe—Reviewed the NEPA Scoping Letter provided and determined the Proposed Action will have "No Adverse Effect" to the Tribe's traditional cultural resources and/or historic properties; concurs with the Proposed Action findings; would not like to receive further project information.

No formal public meetings have been held as part of the NEPA process to date, however, the Town of Marana has been presenting the project to the public since 2022 through outreach efforts, which have included community events, podcast episodes, town newsletters, town holiday events and festivals,

community meetings, and town website publications. A list of the events and publications, the locations, and the types of outreach efforts are included in this EA in Appendix H.

• Public Outreach—the public has been receptive of the project and generally supportive, no specific comments or concerns have been received to date.

4.2 Draft and Final Environmental Assessment's Availability for Review

The Draft and Final EAs are available for download at https://www.maranaaz.gov/airport. Copies of the Draft and Final EA are available for review at the following physical locations:

Location	Information
Marana Regional Airport Administration Office 11700 West Avra Valley Road Marana, Arizona 85653	M–F 7:00 a.m. – 4:00 p.m.
Ed Honea Marana Municipal Complex 1155 West Civic Center Drive Marana, Arizona 85653	M–F 8:00 a.m. – 5:00 p.m.
Wheeler Taft Abbett, Sr. Library 7800 North Schisler Drive Tucson, Arizona 85743	M, W 10:00 a.m. – 6:00 p.m.; T, Th 10:00 a.m. – 7:00 p.m.; F 10:00 a.m. – 5:00 p.m.
FAA Western-Pacific Region, Office of Airports Phoenix Airports District Office 3800 North Central Avenue Suite 1025 Phoenix, Arizona 85012	M–F, 9:00 a.m. – 4:00 p.m., by appointment only ([602] 792-1075)

Following the comment review period, the FAA revised the EA, as necessary, in response to internal and external comments received on the draft document, and prepared this Final EA. Upon review of the Final EA, public comments, and applicable interagency and intergovernmental consultation, the responsible FAA official determines whether any environmental impacts analyzed in the EA are significant:

- (1) If, the responsible FAA official concludes that the proposed action would not result in significant impacts to the human environment, the responsible FAA official may prepare a finding of no significant impact (FONSI) for the signature of the approving official.
- (2) If, based on the EA, the responsible FAA official concludes that the proposed action would significantly affect the human environment, and mitigation would not reduce the potential impact(s) below significant levels, the responsible FAA official must publish a Notice of Intent (NOI) to prepare an environmental impact statement (EIS) in the *Federal Register* and begin the EIS process.

A list of the responses received during the Draft EA's public review period (April 21 through May 21, 2025) are included in Appendix I.

5 LIST OF PREPARERS

Staff at the Town of Marana and Dibble Associates Consulting Engineers conducted engineering and baseline studies for the Proposed Action. SWCA Environmental Consultants prepared this EA with supervision and review by the Town of Marana and FAA. Table 5-1 contains the list of contributors, their affiliation, and role during EA development.

Table 5-1. List of Preparers

Name	Organization / Agency	Role / Expertise		
Taylor N. Neal	FAA, Western-Pacific Region, Office of Airports, Phoenix Airports District Office	Environmental Protection Specialist		
Matthew H. Bilsbarrow	FAA, Western-Pacific Region, Office of Airports, Phoenix Airports District Office	Environmental Planner		
Fausto Burrel	Town of Marana	Public Works Director		
Galen Beem	Town of Marana	Airport Superintendent		
Greg Sendlak	Town of Marana	Project Manager		
Charlie McDermott	Dibble	Project Manager		
Eryn Guevara	Dibble	Environmental Planner		
Theresa Knoblock	SWCA Environmental Consultants	Project Manager		
Ryan Rausch	SWCA Environmental Consultants	Environmental Planner		
Jessica Graeber	SWCA Environmental Consultants	Environmental Planner		
Annie Lutes	SWCA Environmental Consultants	Architectural Historian		
Chris Bockey	SWCA Environmental Consultants	Visual Specialist		

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APPENDIX A

FAA Benefit Cost Ratio Analysis Letter



March 7, 2024

Mr. Galen Beem Airport Manager, Marana Airport, AZ (AVQ) 11700 W. Avra Valley Rd. #91 Marana, AZ 85653

Dear Mr. Beem:

The Federal Aviation Administration (FAA) has completed the Benefit Cost (B/C) Ratio analysis for Marana Airport, AZ (AVQ). The B/C analysis is calculated on the latest airport information, and the Terminal Area Forecast. We are pleased to inform you that the new B/C Ratio for AVQ is 1.36. This B/C Ratio includes an additional 0.1 as required by the FAA Reauthorization Act of 2018. Please see enclosure for calculations.

Therefore, AVQ is accepted as a candidate for the FAA Contract Tower (FCT) Program. Before air traffic control services begin under the FCT Program, a permanent structured control tower must meet FCT Program basic requirements, which can be found in the FCT New Start Application found under the Frequently Asked Questions Item 12. Additionally, FCT Program funding must be available, and AVQ will be required to sign an Air Traffic Control Tower Operations Agreement. Please keep the FAA Program Implementation Manager of your service area, as listed in the New Start Application Package's Point of Contact list, updated on your continued interest in the FCT Program as well as the status and availability of your tower.

AVQ will have 5 years from the date of this letter to provide a control tower that has successfully completed an Operational Readiness Inspection (ORI). If the airport fails to provide a control tower that successfully completes an ORI within the 5-year period, the airport returns to Phase 1, which is the Interest Phase, and can reapply for acceptance into the FCT Program.

For questions concerning FCT Program, please utilize this email for communication 9-AJT-HQ-FCT@FAA.GOV.

Sincerely,

AMY J. Digitally signed by AMY J. GUSKY
Date: 2024.03.14

Amy Gusky Director (A)

Enterprise Services, AJM-3

Enclosure:

Airport Traffic Control Tower Benefit-Cost Model
Appealing FAA's Benefit/Cost Calculation: Factors used in Benefit/Cost Ratio Development

AIRPORT TRAFFIC CONTROL TOWER BENEFIT-COST MODEL

	Airport LOCID (CAPS)	AVQ	MARANA RGNL		
			Marana		AZ
	First Voor of Operation	2023	FCT Candidate		
	<u>First Year of Operation</u> Year of Dollar	2023			
	real of Dollar	2022			
	Analysis Basis	1	2	Establi	shment
	1 Discontinuance		_		
	2 Establishment				
	Operations Count Basis		1	Not Towe	r Count
	1 Not Tower Count				
	2 Tower Count				
	Efficiency Deposit Desig		2	N- F00	0- 04-
1	Efficiency Benefit Basis FSS On Site		2	No FSS	On Site
1	2 No FSS On Site				
	2 No FSS Off Site				
Schedule	ed Cmcl - Acft & Pass Values		5	National AC Aircraf	t Hours
1	Airport Specific FY OAG				
2	OAG for <5K Sched Depart	ts			
3	National OAG				
4	National AC Aircraft Counts	;			
5	National AC Aircraft Hours				
6	Override				
	NonSched Cmcl Ac	ft & Pass Values	2	National AT Air	craft Hours
1	National AT Aircraft Counts		۷	National / (1 / (ii	Graft Floars
2	National AT Aircraft Hours	•			
_	Transman, try an ordit results				
	Local GA - Ac	ft. & Pass. Values	1	Based Acft & Nat'l	GA Acft Hrs
	ALCOHOLOGO DE DESCRICTO DE	Nat'l GA Acft Hrs			
2	National GA Aircraft Counts	5			
3	National GA Aircraft Hours				
Itinerant (GA - Acft. & Pass. Values	i i	3	National GA Aircraft	Hours
1	Local Based Aircraft	'	ū	rational of third air	Tiouro
2	National GA Aircraft Counts	3			
	3 National	GA Aircraft Hours		BASIS	YR 2022
		Coat Footons		YEAR	INDEXED
		Cost Factors One-Time Cost		OF COST 2022	COST -
	Annual Air	Traffic Labor Cost		2022	\$ 704,609
		ital Account Costs		2022	\$ -
		nnual Costs Other		2022	\$ 122,691
	Discontinuance costs (for n		, , , , ,	2022	\$ -
		DISCOUNTED	DISCOUNTED	B-C	B-C
		BENEFITS	COSTS	RATIO	RATIO + 0.1*
		\$ 9,496,118	\$ 7,534,977	1.26	1.36

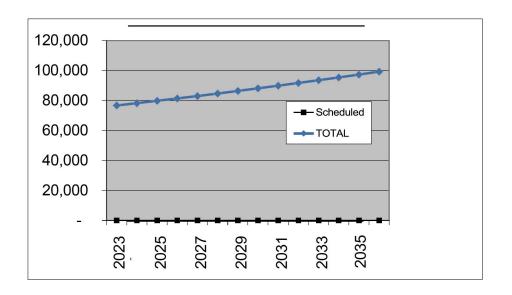
	AVQ BENEFITS								YEAR 2022																
		AVERTED		OTHER				ANNUAL	PRESENT																
YEAR	C	OLLISIONS	A	CCIDENTS	Е	EFFICIENCY		EFFICIENCY		EFFICIENCY		EFFICIENCY		EFFICIENCY		EFFICIENCY		EFFICIENCY		EFFICIENCY		EFFICIENCY		SUMS	VALUES
2023	\$	569,273	\$	114,741	\$	264,756	\$	948,770	\$ 886,701																
2024	\$	590,922	\$	116,523	\$	268,026	\$	975,471	\$ 852,014																
2025	\$	613,432	\$	118,343	\$	271,297	\$	1,003,072	\$ 818,806																
2026	\$	636,907	\$	120,205	\$	274,693	\$	1,031,805	\$ 787,159																
2027	\$	661,300	\$	122,104	\$	278,215	\$	1,061,619	\$ 756,920																
2028	\$	686,651	\$	124,041	\$	281,738	\$	1,092,430	\$ 727,932																
2029	\$	713,020	\$	126,018	\$	285,385	\$	1,124,423	\$ 700,234																
2030	\$	740,440	\$	128,035	\$	289,033	\$	1,157,508	\$ 673,680																
2031	\$	768,960	\$	130,095	\$	292,806	\$	1,191,861	\$ 648,293																
2032	\$	798,657	\$	132,200	\$	296,706	\$	1,227,563	\$ 624,031																
2033	\$	829,541	\$	134,347	\$	300,606	\$	1,264,494	\$ 600,752																
2034	\$	861,693	\$	136,541	\$	304,631	\$	1,302,865	\$ 578,488																
2035	\$	895,172	\$	138,782	\$	308,783	\$	1,342,737	\$ 557,188																
2036	\$	929,981	\$	141,069	\$	312,933	\$	1,383,983	\$ 536,732																
2037	\$	966,200	\$	143,403	\$	317,210	\$	1,426,813	\$ 517,143																
15 YR	\$	11,262,149	\$	1,926,447	\$	4,346,818	\$	17,535,414	\$ 10,266,073																
Α	DJU	STED FOR H	OUF	RS OF TOWE	R	PERATION		92.5%	\$9,496,118																

			AVQ COSTS				YEAR 2022
	CAPITAL	AIR TRAFFIC	AIR FACILITY	ANN COSTS	DISCONT.	ANNUAL	PRESENT
YEAR	COSTS	COSTS	COSTS	OTHER	COSTS	SUMS	VALUES
							\$ -
2023		\$704,609	\$0	\$122,691	\$0	\$827,300	\$ 773,178
2024		\$704,609	\$0	\$122,691		\$827,300	\$ 722,596
2025		\$704,609	\$0	\$122,691		\$827,300	\$ 675,323
2026		\$704,609	\$0	\$122,691		\$827,300	\$ 631,143
2027		\$704,609	\$0	\$122,691		\$827,300	\$ 589,853
2028		\$704,609	\$0	\$122,691		\$827,300	\$ 551,265
2029		\$704,609	\$0	\$122,691		\$827,300	\$ 515,201
2030		\$704,609	\$0	\$122,691		\$827,300	\$ 481,496
2031		\$704,609	\$0	\$122,691		\$827,300	\$ 449,996
2032		\$704,609	\$0	\$122,691		\$827,300	\$ 420,557
2033		\$704,609	\$0	\$122,691		\$827,300	\$ 393,044
2034		\$704,609	\$0	\$122,691		\$827,300	\$ 367,331
2035		\$704,609	\$0	\$122,691		\$827,300	\$ 343,300
2036		\$704,609	\$0	\$122,691		\$827,300	\$ 320,841
2037		\$704,609	\$0	\$122,691		\$827,300	\$ 299,852
15 YR	\$0	\$10,569,135		\$1,840,365			\$7,534,977

OPERATIONS FOR AVQ

FAA CONTRACT TOWER (FCT)

1700 CONTINUE TOWER (101)							
		ITINERA	ANT			LOCAL	
	Scheduled	Non-Sched					
YEAR	Commercia	Commercial	GA	MIL	GA	MIL	TOTAL
2023	13	1,296	19,523	1,248	51,864	1,248	75,192
2024	13	1,296	19,933	1,248	52,953	1,248	76,691
2025	13	1,296	20,351	1,248	54,065	1,248	78,221
2026	13	1,296	20,779	1,248	55,203	1,248	79,787
2027	13	1,296	21,216	1,248	56,363	1,248	81,384
2028	13	1,296	21,661	1,248	57,547	1,248	83,013
2029	13	1,296	22,115	1,248	58,756	1,248	84,676
2030	13	1,296	22,578	1,248	59,990	1,248	86,373
2031	13	1,296	23,052	1,248	61,248	1,248	88,105
2032	13	1,296	23,535	1,248	62,535	1,248	89,875
2033	13	1,296	24,029	1,248	63,847	1,248	91,681
2034	13	1,296	24,533	1,248	65,188	1,248	93,526
2035	13	1,296	25,048	1,248	66,558	1,248	95,411
2036	13	1,296	25,573	1,248	67,956	1,248	97,334
2037	13	1,296	26,110	1,248	69,382	1,248	99,297



FAA Costs Elements

AVQ

Marana Regional Airport FCT Candidate 2022 Fiscal Year HR 302 Section 133

TIIN 302 3600011 133		
Annual Air Traffic Labor Cost	\$	704,609
Annual Costs Other	\$	122,691
Air Traffic Control (ATC) PC&B		
ATC Labor	l	
ATC Benefit Liabilities		
Maintenance (Tech Ops) PC&B	ĺ	
Tech Ops Labor	\$	25,746
Tech Ops Benefit Liabilities		,
	I.	
Federal Contract Tower (FCT) Program	ĺ	
Annual Air Traffic Labor Cost	\$	704,609
Airport's Controller Labor		
Insurance	\$	56,973
Facility Non-Labor		,
ATC Non-Labor	1	
Tech Ops Non-Labor	\$	281
-		
Training	ĺ	
ATC Contract Training		
	L	
Other	ĺ	
Logistics	\$	7,557
Telco	\$	
Utilities		\$ -
Leases		
ATC Medical		
Annual Cost Other		
	'	
Capital Replacement		
Facilities & Equipment (Not Capitalized)		
Facility Direct O&M		
O&M Subtotal		
Overhead		
ATO Indirect(Overhead)	1	
FAA Indirect (Overhead)		
Full Cost		
Total O&M		

APPENDIX B FAA ESA Finding Memorandum and Biological Resources Report



Memorandum

Date: September 4, 2024

To: Administrative File – Environmental Assessment

From: Taylor Neal, Environmental Protection Specialist –

Phoenix Airports District Office, PHX-614

TAYLOR N NEAL Digitally signed by TAYLOR N NEAL Date: 2024.09.04 16:26:14 -07'00'

Subject: Marana Regional Airport (AVQ) – Proposed Airport Traffic Control Tower –

Endangered Species Act Finding

I find that the proposed Airport Traffic Control Tower (ATCT) at Marana Regional Airport would have "no effect" per Section 7 of the Endangered Species Act (ESA).

Federally listed species protected under the ESA aren't known to occur in the project area, and critical habitat isn't present, according to the biologist who prepared the following document, which I incorporate by reference: *Biological Resources Evaluation for the Air Traffic Control Tower Project at the Marana Regional Airport in Marana, Pima County, Arizona*, prepared by SWCA Environmental Consultants, dated June 24, 2024. The biologist conducted a field reconnaissance of 3.58 acres. They considered 10 federally listed species and concluded that nine species were unlikely to occur, and that one species has the potential to occur in the project area: the monarch butterfly, a candidate species not currently afforded protection under the ESA.

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Biological Resources Evaluation Report

To: Charlie McDermott

Senior Aviation Planner

Dibble

7878 North 16th Street, Suite 300

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From: Eleanor R. Gladding, Lead Biologist II – Senior Biologist

Date: June 24, 2024

Re: Biological Resources Evaluation for the Air Traffic Control Tower Project at the Marana

Regional Airport in Marana, Pima County, Arizona / SWCA Project No. 61913

INTRODUCTION

SWCA Environmental Consultants (SWCA) has prepared this biological resources evaluation report (biological report) to address federal, state, and local biological regulations in support of the Federal Aviation Administration (FAA) National Environmental Policy Act (NEPA) review process for the proposed Air Traffic Control Tower Project (ATCT project) at the Marana Regional Airport (FAA identifier AVQ) (airport) in Marana, Pima County, Arizona. This biological report addresses the Endangered Species Act of 1973 (16 United States Code [USC] 1531 et seq.) (ESA), Migratory Bird Treaty Act of 1918 (16 USC 703–712) (MBTA), Bald and Golden Eagle Protection Act of 1940, as amended (BGEPA) (16 USC 668-668d or 50 Code of Federal Regulations [CFR] Part 22), Arizona Department of Agriculture (AZDA)—administered Arizona Native Plant Law (Arizona Revised Statutes [ARS] 3-904), AZDA noxious weed regulations (Arizona Administrative Code R3-4-245), Title 17 of the Town of Marana (Town) Land Development Code, and Pima County Ordinance No. 2010 FC5-Watercourse and Riparian Habitat Protection and Mitigation Requirements (also known as the Riparian Habitat Protection Ordinance). The results of a review of the FAA Wildlife Strike Database records (FAA 2024) are also discussed.

SWCA understands that documentation regarding this biological resources evaluation is necessary for the FAA to review the proposed ATCT project at the airport in Marana, Pima County, Arizona (Figure 1). The project area is in Sections 9 and 10, Township 12 South, Range 11 East, Gila and Salt River Baseline and Meridian, as depicted on the U.S. Geological Survey Marana, Arizona, 7.5-minute quadrangle (Figure 2). The project area is approximately 3.58 acres.

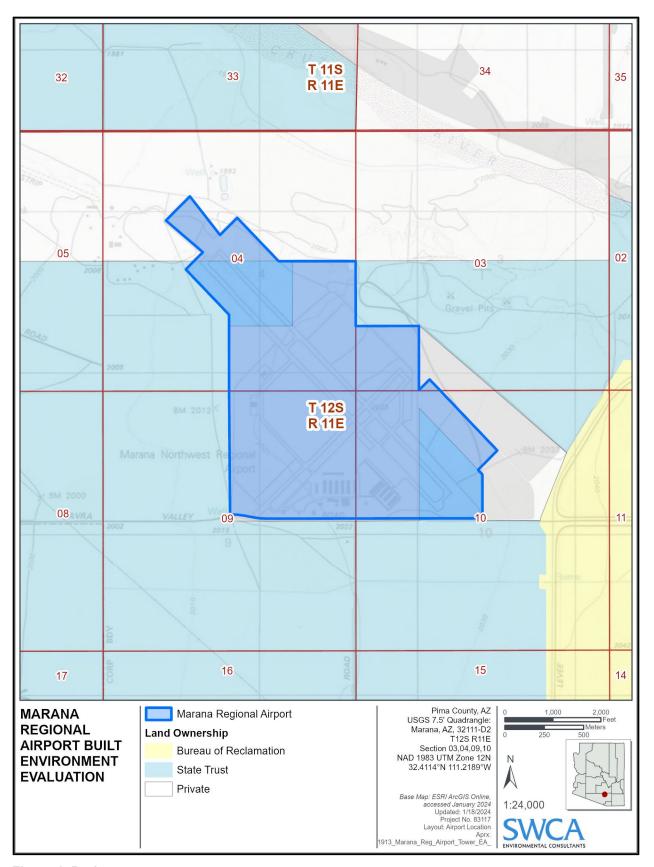


Figure 1. Project area map.

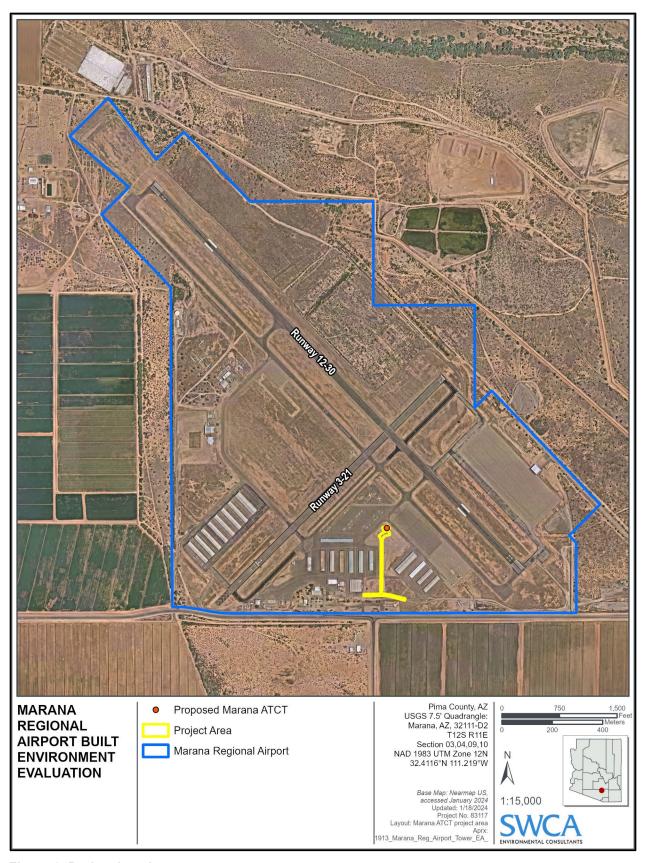


Figure 2. Project location map.

PROJECT DESCRIPTION

The ATCT project includes the following components:

- Construction of a new ATCT that would be approximately 112 feet high (123 feet including rotating beacon, antennae, and lightning protection system [i.e., lightning rods]) and base building);
- Connection of utilities, septic system, airfield lighting, and navigational aid control lines to the proposed tower;
- Construction of a new vehicle access road and parking area; and
- Removal of the existing 50-foot-high beacon tower and relocating the rotating beacon to the top of the new tower as a 28-inch-high rotating beacon.

Permanent new facilities for the ATCT project would occupy 0.9 acre. Ground disturbance would be limited to the extent of the proposed new construction and temporary spaces needed for staging and storage, totaling 7.58 acres. Both permanent and temporary ground disturbance would occur in previously disturbed areas and entirely on airport property.

Construction of the proposed ATCT is anticipated to begin January 2026 and be completed in November 2026, lasting approximately 11 months. All construction activities would occur Monday through Friday and would be restricted to daylight hours. The Town would be responsible for all operation and maintenance costs once the ATCT project is complete, including utilities, repairs, and custodial services. The operational schedule for the proposed tower would be set in accordance with FAA requirements, but it is anticipated that the new ATCT would likely be staffed by two to three people per day and follow typical tower operations, generally from 6:00 AM to 10:00 PM, 7 days per week.

Construct New ATCT and Base Building

The ATCT project would be centrally located, south of the intersection of Runways 12/30 and 3/21. The proposed ground lease for the new tower would encompass approximately 4 acres of municipal land. The height of the full tower, as designed, measures 112 feet to top of the cab—totaling 123 feet inclusive of antennae, rotating beacon, and lightning protection system—and includes an octagonal (eight-sided) 35-foot-high cab mounted approximately 99.2 feet above ground level. As proposed, the cab rests atop a roughly square-shaped tower shaft with a footprint measuring approximately 24 × 24 feet. Whereas the square-shaped tower base would be oriented following the four cardinal points, the cab would be aligned 15 degrees counterclockwise in relation to the tower shaft itself. The foundation for the proposed tower would consist of 4 × 4—foot grade beams on nine 42-inch diameter drilled shafts excavated to a depth of 35 feet.¹

The ATCT project, as proposed, also includes construction of a 1,015-square-foot base building near the proposed ATCT. Its foundation would consist of 2-foot-wide shallow-spread footings with a 1-foot-thick slab-on-grade pad (5 feet above top-of-grade beams).

¹ All dimensions included herein are approximate and are based on the current stage of design as of the date of this report.

Connect Utilities, Airfield Controlled Lighting, and NAVAID Control Lines to the Proposed Tower

The proposed ATCT and base building would require new underground utility connections, including electric, water, gas, and telecommunications services. A joint dry utilities trench would be installed for electric, gas, and telecommunications lines, extending approximately 1,240 feet (18 inches wide) from the base building southward to the existing utility connections near Avra Valley Road. The joint dry utilities trench would be excavated to a depth of 42 inches. The waterline for the new facilities would be placed in a 260-foot-long ×18-inch-wide trench excavated to a depth of 4 feet and would connect to the existing waterline south of the new parking lot.

A new septic system (sewer line, septic tank, and accompanying leach field) would also be constructed to support the new ATCT and base building. The sewer line would be installed in a trench measuring 100 feet in length, 18 inches wide, and excavated to a depth of 6 feet. The corresponding new septic tank would be placed in an approximately 10×6 —feet trench and excavated to a depth of 8 feet. Finally, the leach field would measure 69×49 feet (3,381 square feet) in area and be excavated to a depth of 6 feet.

New construction for the ATCT would include installation of new ATCT equipment, the design of which is undetermined at this time and will depend on the final design. The ATCT project would also involve remove the existing 50-foot-high beacon tower (leaving the 10×10 -foot, 6-inch-thick concrete slab foundation in place), and the 28-inch-high rotating beacon would be relocated to the top of the new tower on an 18-inch square-mounting base.

Construct New Access Road and Vehicle Parking Area

Construction of the new ACTC and base building would include a new asphalt paved vehicle parking lot for ACTC personnel and visitors, measuring approximately 139 × 42 feet (5,838 square feet) in area. The new ACTC facility would be accessed via a new asphalt road (oriented north-south), approximately 692 feet long × 20 feet wide (13,840 square feet of newly paved surface), along with construction of a new asphalt access road extension from the existing roadway termination (oriented east-west), measuring approximately 548 feet long × 24 feet wide (13,152 square feet of extended access road) to connect with the existing airport road network. All new pavement associated with the ATCT project would be 10 inches thick, consisting of 4 inches of asphalt atop 6 inches of aggregate base course.

The ATCT project is shown in Figure 3.

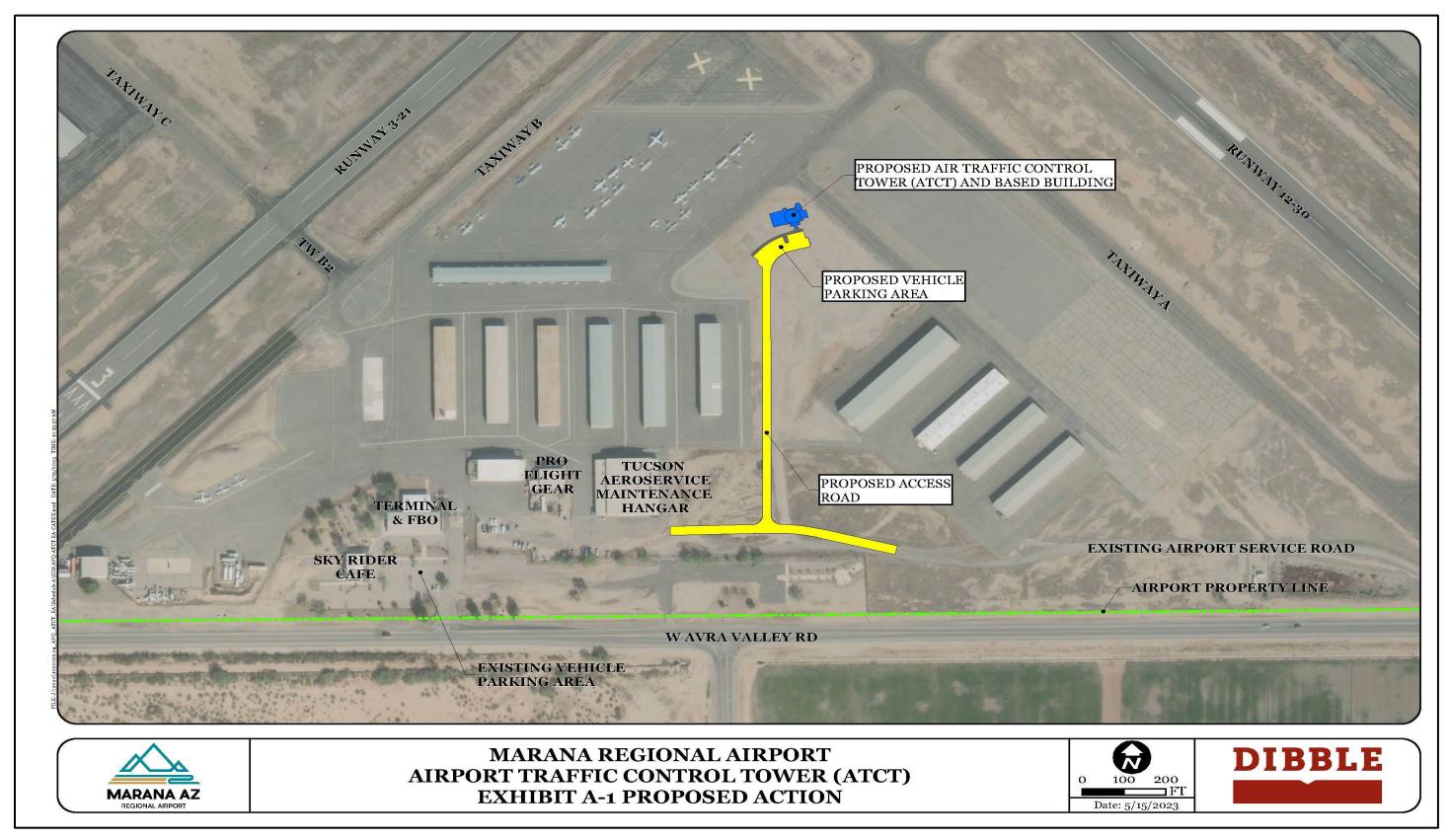


Figure 3. Project components.

METHODS

An SWCA qualified biologist conducted a field reconnaissance of the project area on June 20, 2024, to collect data necessary to complete this biological resources evaluation. Before the field reconnaissance survey commenced, the biologist reviewed the project area geographical information system (GIS) imagery on Google Earth (Google Earth 2024) provided by Dibble, the contractor assisting the Town with the ATCT project. The field reconnaissance consisted of a pedestrian survey of the project area to evaluate vegetation and other habitat features considered important to special-status plant and animal species potentially occurring in the project area. This field reconnaissance did not include any species-specific surveys or systematic surveys for protected biological components. The SWCA biologist accessed the project area escorted by airport operations personnel to ensure that safety and security requirements were acknowledged and followed. Vegetation was classified to the community level according to the map "Biotic Communities of the Southwest" (Brown 1994). The Natural Resources Conservation Service (NRCS) PLANTS database was used for plant naming conventions (NRCS 2024). Federally listed plants are referred to by the nomenclature used by the U.S. Fish and Wildlife Service (USFWS) for listing.

ECOLOGICAL OVERVIEW

The project area consists of private airport land within the Lower Colorado River Valley Subdivision of the Sonoran Desertscrub biotic community at a median elevation of 2,022 feet above mean sea level (amsl) (Brown 1994).

The airport is bounded on the south and west by agricultural fields. Disturbed areas and desertscrub occur to the north and east of the airport. The Santa Cruz River flows generally parallel with the main runway for the airport, approximately 1.25 miles to the north.

Within the project area, the land has been mostly disturbed with a low density of plants, some of which are landscaped plants. Native plant species were observed included brittlebush (*Encelia farinosa*), catclaw acacia (*Senegalia greggii*), cryptantha (*Cryptantha* sp.), desert globemallow (*Sphaeralcea ambigua*), desert willow (*Chilopsis linearis*), ocotillo (*Fouquieria splendens*), pepperweed (*Lepidium* sp.), desert willow (*Chilopsis linearis*), purple threeawn (*Aristida purpurea*), soaptree yucca (*Yucca* elata), saguaro (*Carnegiea gigantea*), yellow paloverde (*Parkinsonia microphylla*), and velvet mesquite (*Prosopis velutina*).

Nonnative species observed included Bermudagrass (*Cynodon dactylon*), common Mediterranean grass (*Schismus barbatus*), Maltese star-thistle (*Centaurea melitensis*), prickly Russian thistle (*Salsola tragus*), redflower false yucca (*Hesperaloe parviflora*), Texas ebony (*Ebenopsis ebano*), Texas live oak (*Quercus fusiformis*), and Texas barometer bush (*Leucophyllum frutescens*).

Bird species documented within the project area include mourning dove (*Zenaida macroura*) and house finch (*Haemorhous mexicanus*). No nests were observed.

Several small-diameter (3 inches or fewer) burrows that likely are lizard burrows were observed along the berm adjacent to West Avra Valley Road. No other signs of reptiles or mammals were observed in the project area.

FEDERAL ENDANGERED SPECIES ACT

The USFWS maintains a list of protected species and critical habitats that are known to occur in each Arizona county. SWCA accessed the USFWS Information for Planning and Consultation (IPaC) online database (USFWS 2024a) to obtain information on federally listed species that have the potential to occur in the project area (project code: 2023-0098289) (Appendix A). These species are currently listed as endangered or threatened under the ESA or are considered experimental population, non-essential species. The list also includes one candidate species for listing as threatened or endangered. The ESA specifically prohibits the "take" of an endangered wildlife species or listed threatened wildlife species if an ESA species-specific 4(d) rule is implemented. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to engage in any such conduct." However, the ESA does not provide the same take protections for plant species, except on federal land.

Species Evaluation

The potential for occurrence of each species was summarized according to the categories listed below. Because not all species are accommodated precisely by a given category (i.e., category definitions may be too restrictive), an expanded rationale for each category assignment is provided. Potential for occurrence categories are as follows.

- Known to occur—the species has been documented in the project area by a reliable observer.
- *May occur*—the project area is within the species' currently known range, and vegetation communities, soils, etc. resemble those known to be used by the species.
- *Unlikely to occur*—the project area is within the species' currently known range, but vegetation communities, soils, etc. do not resemble those known to be used by the species, or the project area is clearly outside the species' currently known range.

Species listed by the USFWS were assigned to one of three categories of possible effect, in accordance with the following USFWS recommendations:

- May affect, is likely to adversely affect—the proposed project is likely to adversely affect a species if 1) the species occurs or may occur in the project area and 2) any adverse effect on listed species may occur as a direct or indirect result of the proposed action or its interrelated or interdependent actions, and the effect is not discountable, insignificant, or beneficial. In the event that the overall effect of the proposed action is beneficial to the listed species but also is likely to cause some adverse effects, the proposed action "is likely to adversely affect" the listed species.
- May affect, is not likely to adversely affect—the project is not likely to adversely affect a species if 1) the species may occur, but its presence has not been documented and/or surveys following approved protocol have been conducted with negative results, and/or 2) project activity effects on a listed species are expected to be discountable, insignificant, or completely beneficial.
- No effect—the project would have no effect on a species or its designated critical habitat (including effects that may be beneficial, insignificant, or discountable) if 1) the species is considered unlikely to occur (range, vegetation, etc., are inappropriate) and 2) neither the species nor its sign was observed during surveys of the project area.

² Beneficial effects are contemporaneous positive effects without any adverse effects on the species. Insignificant effects relate to the size of the impact and should never reach the scale where take occurs. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not 1) be able to meaningfully measure, detect, or evaluate insignificant effects or 2) expect discountable effects to occur.

Because species not listed as threatened or endangered are not protected under the authority of the ESA, impact determinations for these species do not follow the above USFWS recommendations. Instead, the impact determinations for any species listed as candidate or proposed endangered/threatened and not protected under the ESA are as follows:

- *No impact*—the project would have no impact on a species if 1) the species is considered unlikely to occur (range, vegetation, etc., are inappropriate) and 2) neither the species nor its sign was observed during surveys of the project area.
- *Beneficial impact*—the project is likely to benefit the species, whether it is currently present or not, by creating or enhancing habitat elements known to be used by the species.
- May impact individuals but is not likely to result in a trend toward federal listing or loss of viability—the project is not likely to adversely impact a species if 1) the species may occur, but its presence has not been documented and 2) project activities would not result in disturbance to areas or habitat elements known to be used by the species.
- May impact individuals and is likely to result in a trend toward federal listing or loss of viability—the project is likely to adversely impact a species if 1) the species is known to occur in the project area and 2) project activities would disturb areas or habitat elements known to be used by the species or would directly affect an individual.

Only one of the 10 species on the USFWS project-specific list for Pima County has the potential to occur in the project area: the monarch butterfly, a candidate species not currently afforded protection under the ESA. This project *may impact individual* monarch butterflies but is *not likely to result in a trend toward federal listing or loss of population viability*. The project area is clearly beyond the known geographic or elevational range of the remaining ESA-listed species or it does not contain vegetation or landscape features known to support these species (or both), and the project will have no effect on these species (Table 1).

Table 1. Federally Listed Species Potentially Occurring in Pima County, Arizona

Common Name (Scientific Name)	Status*	Range or Habitat Requirements [†]	Potential for Occurrence in Project Area	Determination of Effect
Arizona eryngo (Eryngium sparganophyllum)	Е	Occurs in spring-fed ciénega wetlands in moist to saturated organic alkali soils. Plants thrive in full sun in areas without nonnative plant species or excessive woody vegetation. In Arizona, occurs in three disjunct populations in Pima and Cochise Counties at elevations from 2,707 to 4,000 feet amsl: Agua Caliente Ranch, where it is extirpated but reintroduced; La Cebadilla Cienega, near Tanque Verde Wash east of Tucson; and Lewis Springs Cienega within the San Pedro Riparian National Conservation Area.	Unlikely to occur. The project area does not contain suitable habitat for this species, and it outside of the currently known range of the species.	No effect.
Gila topminnow, including Yaqui topminnow (Poeciliopsis occidentalis)	E	Occurs in small streams, springs, and ciénegas at elevations below 4,500 feet amsl, primarily in shallow areas with aquatic vegetation and debris for cover. In Arizona, most of the remaining native populations are in the Santa Cruz River system.	Unlikely to occur. The project area does not contain suitable habitat for this species, and it outside of the currently known range of the species. Even though the Santa Crus River is near the project area, no impacts to the river would occur.	No effect.
California least tern (Sterna antillarum browni)	E	Forms nesting colonies on barren to sparsely vegetated areas. Nests in shallow depressions on open sandy beaches, sandbars, gravel pits, or exposed flats along shorelines of inland rivers, lakes, reservoirs, and drainage systems at elevations below 2,000 feet amsl. Found in Maricopa, Mohave, and Pima Counties.	Unlikely to occur. The project area does not contain suitable habitat for this species.	No effect.
Jaguar (Panthera onca)	Е	Although jaguars were once more common in southern Arizona, currently they are most associated with expansive rugged areas within the Madrean evergreen woodland and semidesert grasslands biotic communities and distant from human presence and roads near water, prey, and cover in the mountain ranges of southeastern Arizona. Additionally, valley bottoms and drainage features may provide travel corridors for jaguars between these areas. In the last 27 years (1996–2023), there have been reliable and spatially accurate sighting records of seven, possibly nine, male jaguars (including five individuals sighted multiple times) in the mountain ranges and canyons in southeastern Arizona (USFWS 2024b).	Unlikely to occur. The project area does not contain suitable habitat for this species.	No effect.
Monarch butterfly (Danaus plexippus)	С	A migratory species found in a variety of habitats; monarchs require milkweed (family <i>Asclepiadaceae</i>) for breeding. During fall migration in Arizona, monarchs favor nectar from a variety native and garden plants (Morris et al. 2015). Populations in Arizona can migrate either to California or Mexico for winter or may overwinter in the low deserts in California or Arizona (Morris et al. 2015). In the southwestern United States, migrating monarchs often occur near water sources (e.g., rivers, creeks, riparian corridors, roadside ditches, irrigated gardens). In the low deserts of Arizona, monarchs breed in late August to early September (Morris et al. 2015).	May occur. This species may be present as transients during migration or as occasional individuals passing through the project area en route to larval food plants or nectar resources. No Asclepias species were observed in the project area for larval use, but nectar sources are available for foraging and migration. According to the Western Monarch Milkweed Mapper (WMMM), there are no occurrences of milkweed plants or individual monarch sightings within or adjacent to the AVQ. The nearest monarch record is approximately 5 miles west of the project area, and the nearest milkweed record is approximately 9 miles southeast of the project area (WMMM 2024).	May impact individuals but is not likely to result in a trend toward federal listing or loss of population viability.

Common Name (Scientific Name)	Status*	Range or Habitat Requirements [†]	Potential for Occurrence in Project Area	Determination of Effect
Ocelot (Leopardus (=Felis) pardalis)	E	In Arizona, this species has typically been observed in subtropical thorn forest, thornscrub, and dense, brushy thickets at elevations below 8,000 feet amsl and is often found in riparian bottomlands. The essential habitat component is dense cover near the ground and complete avoidance of open country. Most recently, this species has only been detected in the Huachuca Mountain range in southeastern Arizona.	Unlikely to occur. The project area does not contain suitable habitat for this species.	No effect.
Sonoran pronghorn (Antilocapra americana sonoriensis)	E/NEP	Found in Sonoran desertscrub within broad, intermountain, alluvial valleys with creosote bush (<i>Larrea tridentata</i>)—bursage (<i>Ambrosia</i> spp.) and paloverde (<i>Parkinsonia</i> spp.)—mixed cacti associations at elevations between 2,000 and 4,000 feet amsl. The only extant U.S. population is in southwestern Arizona; however, the USFWS has established a 10(j) area for reintroductions in southwestern Arizona.	Unlikely to occur. There is no suitable habitat for the species in the project area. The project area is distant from the current occupied range of the species.	No effect.
Sonoyta mud turtle (Kinosternon sonoriense longifemorale)	E	In Arizona, found only in pond and stream habitat at Quitobaquito Springs in Organ Pipe Cactus National Monument. This subspecies of the more common Sonora mud turtle (<i>Kinosternon sonoriense sonoriense</i>) also occurs in Rio Sonoyta, Mexico.	Unlikely to occur. In Arizona, this species is found only in Quitobaquito Spring, more than 110 miles southwest of the project area.	No effect.
Southwestern willow flycatcher (Empidonax traillii extimus)	E	Found in dense riparian habitats along streams, rivers, and other wetlands where cottonwood (<i>Populus</i> spp.), willow (<i>Salix</i> spp.), boxelder (<i>Acer negundo</i>), saltcedar (<i>Tamarix</i> spp.), Russian olive (<i>Elaeagnus angustifolia</i>), buttonbush (Cephalanthus spp.), and arrowweed (<i>Pluchea sericea</i>) are present. Nests are found in thickets of trees and shrubs, primarily those that are 13 to 23 feet tall, among dense, homogeneous foliage. Habitat occurs at elevations below 8,500 feet amsl.	Unlikely to occur. The project area does not contain suitable habitat for the species.	No effect.
Yellow-billed cuckoo (Coccyzus americanus)	Т	Typically found in riparian woodland vegetation (cottonwood, willow, or saltcedar) at elevations below 6,600 feet amsl. Dense understory foliage appears to be an important factor in nest site selection. The highest concentrations in Arizona are along the Agua Fria, San Pedro, upper Santa Cruz, and Verde River drainages and Cienega and Sonoita Creeks.	Unlikely to occur. There is a record of this species occurring within 3 miles of the project area, which is likely along the Santa Cruz River 1.25 miles north of the project area. There is no suitable habitat within or in proximity to the project area.	No effect.

Notes: Range or habitat information is from the Arizona Game and Fish Department (AZGFD) Heritage Data Management System (AZGFD 2024a); and *Arizona Breeding Bird Atlas* (Corman and Wise-Gervais 2005); and USFWS Environmental Conservation Online System (USFWS 2024c).

^{*}USFWS Status Definitions:

C = Candidate. Candidate species are those for which the USFWS has sufficient information on biological vulnerability and threats to support proposals to list as endangered or threatened under the ESA. However, proposed rules have not yet been issued because such actions are precluded at present by other listing activity.

E = Endangered. An animal or plant species in danger of extinction throughout all or a significant portion of its range.

NEP = Non-Essential Experimental Population. Experimental populations of a species designated under Section 10(j) of the ESA for which the USFWS, through the best available information, believes is not essential for the continued existence of the species. Regulatory restrictions are considerably reduced under an NEP designation.

T = Threatened. An animal or plant species likely to become endangered within the foreseeable future throughout all or a significant portion of its range.

MIGRATORY BIRD TREATY ACT AND BALD AND GOLDEN EAGLE PROTECTION ACT

Two avian species were observed in the project area during the site visit: mourning dove and house finch. In central Arizona, some bird species are multi-clutch species, which means that they nest multiple times during the nesting season, generally from March through September and from January through June for raptors. Based on the sparse, ground-covering vegetation present within the project area and existing haul road buffer zone, the potential for any bird nests to occur is minimal. As mentioned in the Ecological Overview section, a narrow corridor of desert broom and velvet mesquite vegetation borders a portion of the unpaved haul road 20-foot buffer zone, providing suitable nesting substrate. No nests were observed along this narrow vegetation corridor adjacent to the unpaved haul road. All the bird species that have the potential to occur in the project area are protected under the MBTA, which provides federal protection to all migratory birds, including nests and eggs. To relocate or alter any MBTA-protected nests, it will be necessary to obtain a permit from the USFWS to maintain compliance with the MBTA. However, the USFWS Destruction and Relocation of Migratory Bird Nest Contents Memorandum states that if a nest is completely inactive at the time of destruction or movement, a permit is not required to comply with the MBTA (USFWS 2018). In the unlikely event that an active nest is observed before or during construction, measures should be taken to protect the nest from destruction and to avoid a violation of the MBTA.

Bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*) are protected under both the MBTA and BGEPA. No nesting or foraging eagle habitat is in or near the project area, and no tall trees suitable for eagle perching are within the project area. The project area would not be attractive to either bald or golden eagles, thus no impacts to these species are anticipated from this project.

The western burrowing owl (*Athene cunicularia*) is a common species within airport landscapes. The online Arizona Environmental Tool (ERT) project-specific list indicates that there is an occurrence record for the western burrowing owl within 3 miles of the project area (Arizona Game and Fish Department [AZGFD] 2024b). No individuals, suitable burrows, or indicators of burrow use (e.g., fresh whitewash, fresh pellets, feathers, or nest ornamentation) by the western burrowing owl were observed in the project area. This species is unlikely to occur, and the project would not be expected to impact the species. However, if a burrowing owl is observed during construction, SWCA should be contacted for guidance on measures to maintain compliance with the MBTA.

ERT SPECIAL-STATUS SPECIES RESULTS

The ERT search results included records of 15 special-status species occurring within 3 miles of the project area (Appendix B) (AZGFD 2024a). The results include eight special-status species. Yellow-billed cuckoo (*Coccyzus americanus*) is discussed in Table 1, and western burrowing owl is discussed in the Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act section above. Verdin (*Auriparus flaviceps*), Swainson's hawk (*Buteo swainsoni*), American kestrel (*Falco sparverius*), and Abert's towhee (*Melozone aberti*) are also protected under the MTA, although not directly mentioned in the Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act section above, the information in that section applies to those species. The other two species with regulatory protection, the cactus ferruginous pygmy-owl (CFPO) (*Glaucidium brasilianum cactorum*) and the Sonoran Desert tortoise (SDT) (*Gopherus morafkai*), are discussed below.

CFPO suitable habitat includes large trees or cacti with suitable cavities for shelter and nesting near riparian and xeroriparian drainages (AZGFD 2024a). No suitable habitat is present in the project area, and no impacts to the species would occur from this project.

The SDT occurs primarily on rocky slopes (AZGFD 2024a) and is most often found in paloverde-mixed cacti associations of the Arizona Upland subdivision of the Sonoran Desertscrub biotic community. It may occur but is less likely to occur in desert grassland, juniper woodland, interior chaparral habitats, and even pine communities (Averill-Murray and Klug 2000). Washes and valley bottoms may be used by SDTs for dispersal in some areas. SDTs are active between spring and early fall, with peak activity occurring during the monsoon season (AZGFD 2024a). Suitable habitat for the SDT is not present within the project area, and no visual observation or signs of presence (e.g., burrows, scat, or tracks) were noted during the field reconnaissance. Because the airport perimeter is fenced for security, it unlikely that a tortoise would wander into the airfield. However, in the event a tortoise were to be able to get under the fence, the *Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects* (AZGFD 2014) should be followed (Appendix C).

ARIZONA DEPARTMENT OF AGRICULTURE ARIZONA NATIVE PLANT LAW

Protected native plants classified under the Arizona Native Plant Law (ARS 3-904) are present in the project area. This law states that protected plants cannot be salvaged and transported from any nonfederal land in Arizona without permission and a permit from the AZDA. It also requires notification prior to land clearing. It should be noted that landscaped individuals of these plant species are exempt from this law. More information regarding this state regulation can be found on the AZDA Native Plants website (AZDA 2024a).

Plant species documented in the project area that are protected under the Arizona Native Plant Law as administered by the AZDA include ocotillo, desert willow, soaptree yucca, saguaro, velvet mesquite, and yellow paloverde.

The AZDA Notice of Intent to Clear Land form is in Appendix D of this report. This form must be completed and submitted to the AZDA prior to vegetation-removal activities. As noted on page 2 of the form, the notice period required for submittal of the form is dependent on the amount of land that will be cleared. If native plants will be salvaged and replanted off-site, the applicant needs to include this information with the Notice of Intent to Clear Land form at the time of submittal and request salvage permits.

ARIZONA DEPARTMENT OF AGRICULTURE NOXIOUS WEED REGULATIONS

The AZDA defines three classes of noxious weeds in the state of Arizona (AZDA 2024b):

- Class A is categorized as a species of plant that is not known to exist or that is of limited distribution in the state and is a high-priority pest for quarantine, control, or mitigation.
- Class B is categorized as a species of plant that is known to occur but that is of limited distribution in the state and may be a high-priority pest for quarantine, control, or mitigation if a significant threat to a crop, commodity, or habitat is known to exist.
- Class C is categorized as a species of plant that is widespread but may be recommended for active control based on risk assessment.

Two restrictions have been developed to control noxious weeds in the state. First, no Class A, B, or C noxious weeds or commodity infested or contaminated with a Class A, B, or C noxious weed can be admitted into the state unless otherwise authorized by the AZDA. Second, the AZDA may quarantine and abate an area infested or contaminated with a Class A or Class B noxious weed if it has been determined that an imminent threat to agriculture or horticulture exists.

One AZDA noxious weed species was observed in the project area: Maltese star-thistle. This species is a Class B noxious weed. Protection measures are recommended to reduce the potential introduction and spread of noxious weeds and other invasive species. This includes cleaning all construction equipment prior to entering and leaving the site during construction.

TOWN OF MARANA NATIVE PLANT PRESERVATION ORDINANCE

Title 17 of the Town Land Development Code (Environmental Resource Preservation, Native Plant Protection and Landscape Requirements) provides for the protection of unique or significant vegetation within the town of Marana (Town of Marana 2001). No unique or significant vegetation is present in the project area. Similarly, no ridges, peaks, rock outcroppings, or riparian areas are present within or adjacent to the project area.

Title 17 of the Town Land Development Code also provides for the preservation, protection, transplanting, and replacement of existing designated native plants, including cacti, succulents, trees, and shrubs, through the establishment of comprehensive procedures, requirements, and standards that protect the public health, safety, and general welfare. Plant species observed in the project area that are protected under this ordinance include catclaw acacia, desert willow, ocotillo, saguaro, soaptree yucca, velvet mesquite, and yellow paloverde. Because of the very limited vegetation and landscaped plants present in the project area, the ATCT project may qualify for a Native Plant Permit Exception. A Native Plant Permit Exception Form and supporting photographic verification must be submitted to the Town Planning Department for review and approval at the time of development application.

PIMA COUNTY RIPARIAN HABITAT PROTECTION ORDINANCE

Pima County Ordinance No. 2010 FC5 – Watercourse and Riparian Habitat Protection and Mitigation Requirements, also known as the Riparian Habitat Protection Ordinance, provides protection for riparian and floodplain habitats within Pima County (Pima County 2024). There are no riparian or floodplain resources mapped or present in the project area. The nearest riparian habitat is approximately 1 mile north of the project area along the Santa Cruz River. Additionally, the presence of multiple lined irrigation channels between the project area and the Santa Cruz River precludes any water-transported sediments or pollutants that could be generated from development or operation of the proposed project from reaching or affecting the Santa Cruz River riparian habitats.

FAA STRIKE DATABASE

SWCA accessed the FAA Wildlife Strike Database to obtain a list of wildlife strikes recorded at airport. Between 2011 and 2021, nine wildlife strikes were reported, including four unknown small birds, one collared peccary (*Dicotyles tajacu*), one coyote (*Canis latrans*), one turkey vulture (*Cathartes aura*), one American kestrel (*Falco sparverius*), and one cliff swallow (*Petrochelidon pyrrhonota*) (FAA 2024). Because this project involves the construction of an ATCT that has not previously existed at the airport and because of improvements in identifying potential wildlife hazards and communicating that hazard with pilots and airport staff, the risk of wildlife strikes are likely to be minimized.

RECOMMENDATIONS

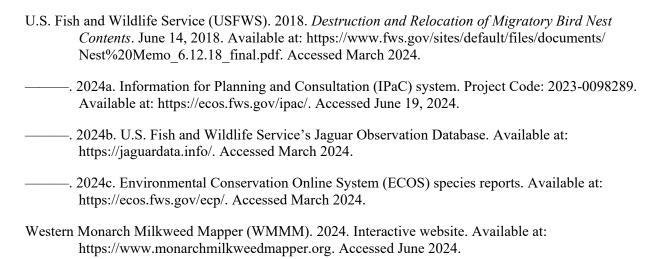
The following items are recommendations for maintaining compliance with environmental regulations discussed in this report.

- No burrowing owls or suitable burrows for this species occur in the project area; however, if a burrowing owl is observed before construction begins or during construction, SWCA should be contacted for guidance on measures to maintain compliance with the MBTA.
- If ground-disturbing activities are planned during the migratory bird nesting season (mid-February through late September), measures to avoid any active bird nests within the project area should be taken to maintain compliance with the MBTA.
- Should an SDT be encountered in the project areas during construction, adhering to the AZGFD *Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects* is recommended and would minimize direct impacts to this species (see Appendix C).
- Protection measures are recommended to reduce the potential for introduction and spread of noxious weeds and other invasive species. This includes cleaning all construction equipment prior to entering and leaving the site during construction.
- To ensure that all Town regulations and ordinances are complied with for the project, the Town should be offered a review of this project for comment.

The results and conclusions of this biological resources evaluation report represent SWCA scientists' best professional judgment, based on information provided by the project proponent, applicable agencies, and other sources during the course of this study. No other warranty, expressed or implied, is made. Project notes and files are available in SWCA's office project files. The SWCA project number is 61913.

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APPENDIX A

USFWS IPaC Species List for Pima County, Arizona



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Arizona Ecological Services Field Office 9828 North 31st Ave #c3

Phoenix, AZ 85051-2517 Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To: 06/19/2024 21:11:13 UTC

Project Code: 2023-0098289

Project Name: Marana Regional Airport Traffic Control Tower

Subject: List of threatened and endangered species that may occur in your proposed project

location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and it's critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12. If the Federal action agency determines that listed species or critical habitat may be affected by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream affects. If the Federal action agency determines that the action may jeopardize a *proposed* species or may adversely modify *proposed* critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Project code: 2023-0098289

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend that they be considered in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at: https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf.

We also advise you to consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 *et seq.*). The MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1,026 species of birds are protected by the MBTA, including the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls can be found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle or golden eagle nest occurs in or near the proposed project area, our office should be contacted for Technical Assistance. An evaluation must be performed to determine whether the project is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles (see https://www.fws.gov/program/eagle-management).

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following web site: https://www.fws.gov/program/migratory-bird-permit. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital television, radio, and emergency broadcast) can be found at https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation.

The U.S. Army Corps of Engineers (Corps) may regulate activities that involve streams (including some intermittent streams) and/or wetlands. We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources, please visit this link or visit https://www.fws.gov/program/national-

wildlife-refuge-system to locate the refuge you would be working in or around.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated. For more information, please contact our Tribal Coordinator, John Nystedt, at 928/556-2160 or John Nystedt@fws.gov.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/project-evaluation-program/).

We appreciate your concern for threatened and endangered species. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If we may be of further assistance, please contact our Flagstaff office at 928/556-2118 for projects in northern Arizona, our general Phoenix number 602/242-0210 for central Arizona, or 520/670-6144 for projects in southern Arizona.

Sincerely, /s/

Heather Whitlaw Field Supervisor Attachment

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arizona Ecological Services Field Office 9828 North 31st Ave #c3 Phoenix, AZ 85051-2517 (602) 242-0210

PROJECT SUMMARY

Project Code: 2023-0098289

Project Name: Marana Regional Airport Traffic Control Tower

Project Type: Airport - New Construction

Project Description: The Town of Marana is proposing to construct and operate a new Airport

Traffic Control Tower at the Marana Regional Airport in Marana, Pima County, Arizona which will a require FAA NEPA process. Thus, SWCA is

conducting a biological resources analysis for the project.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@32.40407985,-111.216489347325,14z



Counties: Pima County, Arizona

ENDANGERED SPECIES ACT SPECIES

Project code: 2023-0098289

There is a total of 10 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. <u>NOAA Fisheries</u>, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Project code: 2023-0098289 06/19/2024 21:11:13 UTC

MAMMALS

NAME STATUS

Jaguar Panthera onca

Endangered

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.

Species profile: https://ecos.fws.gov/ecp/species/3944

Ocelot *Leopardus* (=*Felis*) *pardalis*

Endangered

No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4474

Sonoran Pronghorn Antilocapra americana sonoriensis

Experimental Population,

Population: U.S.A. (AZ), Mexico No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4750

Non-Essential

BIRDS

NAME STATUS

Cactus Ferruginous Pygmy-owl *Glaucidium brasilianum cactorum*

Threatened

There is **final** critical habitat for this species.

Species profile: https://ecos.fws.gov/ecp/species/1225

California Least Tern Sternula antillarum browni

No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/8104

Endangered

Yellow-billed Cuckoo Coccyzus americanus

Population: Western U.S. DPS

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.

Species profile: https://ecos.fws.gov/ecp/species/3911

Threatened

REPTILES

NAME STATUS

Sonoyta Mud Turtle Kinosternon sonoriense longifemorale

Endangered

There is **final** critical habitat for this species.

Species profile: https://ecos.fws.gov/ecp/species/7276

FISHES

NAME STATUS

Gila Topminnow (incl. Yaqui) Poeciliopsis occidentalis

Endangered

No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1116

INSECTS

NAME STATUS

Monarch Butterfly *Danaus plexippus*

Candidate

No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743

FLOWERING PLANTS

NAME STATUS

Arizona Eryngo Eryngium sparganophyllum

Endangered

Population:

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.

Species profile: https://ecos.fws.gov/ecp/species/10705

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the <u>National Wildlife Refuge</u> system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act¹ and the Migratory Bird Treaty Act².

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats³, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

- 1. The Bald and Golden Eagle Protection Act of 1940.
- 2. The Migratory Birds Treaty Act of 1918.
- 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats³ should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

- 1. The Migratory Birds Treaty Act of 1918.
- 2. The Bald and Golden Eagle Protection Act of 1940.
- 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Avocet <i>Recurvirostra americana</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/11927	Breeds Apr 21 to Aug 10
Bendire's Thrasher <i>Toxostoma bendirei</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9435	Breeds Mar 15 to Jul 31
Costa's Hummingbird <i>Calypte costae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470	Breeds Jan 15 to Jun 10
Gila Woodpecker <i>Melanerpes uropygialis</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5960	Breeds Apr 1 to Aug 31
Lawrence's Goldfinch <i>Spinus lawrencei</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9464	Breeds Mar 20 to Sep 20

NAME BREEDING SEASON

Marbled Godwit *Limosa fedoa*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

https://ecos.fws.gov/ecp/species/9481

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (**•**)

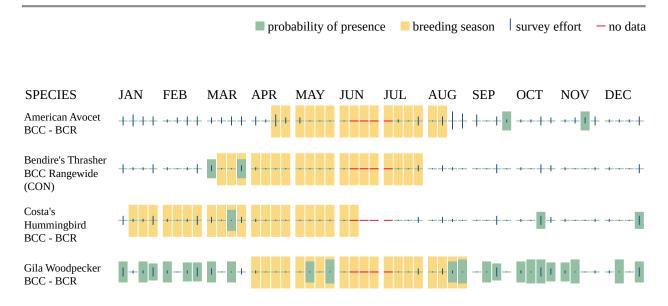
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

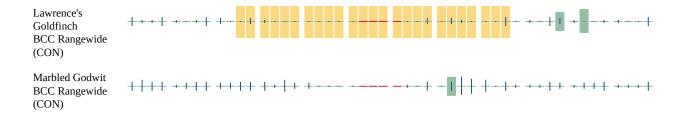
Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (-)

A week is marked as having no data if there were no survey events for that week.





Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to <u>NWI wetlands</u> and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local <u>U.S. Army Corps of Engineers District</u>.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

Project code: 2023-0098289 06/19/2024 21:11:13 UTC

IPAC USER CONTACT INFORMATION

Agency: Federal Aviation Administration

Name: Eleanor Gladding Address: 343 W Franklin St

City: Tucson State: AZ Zip: 85701

Email egladding@swca.com

Phone: 5203259194

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Aviation Administration

APPENDIX B

Arizona Heritage Geographic Information System Online Environmental Review Tool Results

Arizona Environmental Online Review Tool Report



Arizona Game and Fish Department Mission

To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Project Name:

Marana Regional Airport Traffic Control Tower

User Project Number:

61913

Project Description:

The Town of Marana is proposing to construct and operate a new Airport Traffic Control Tower at the Marana Regional Airport in Marana, Pima County, Arizona which will a require FAA NEPA process. Thus, SWCA is conducting a biological resources analysis for the project.

Project Type:

Transportation & Infrastructure, Airports, Construction of new runways, terminals/concourses, other facilities

Contact Person:

Eleanor Gladding

Organization:

SWCA Environmental Consultants

On Behalf Of:

FAA

Project ID:

HGIS-19637

Please review the entire report for project type and/or entered. Please retain a copy for future reference.	r species recommendations for the location information

Disclaimer:

- 1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
- 2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
- 3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
- 4. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

Locations Accuracy Disclaimer:

Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

Recommendations Disclaimer:

- 1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
- 2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
- 3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
- 4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
- 5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:

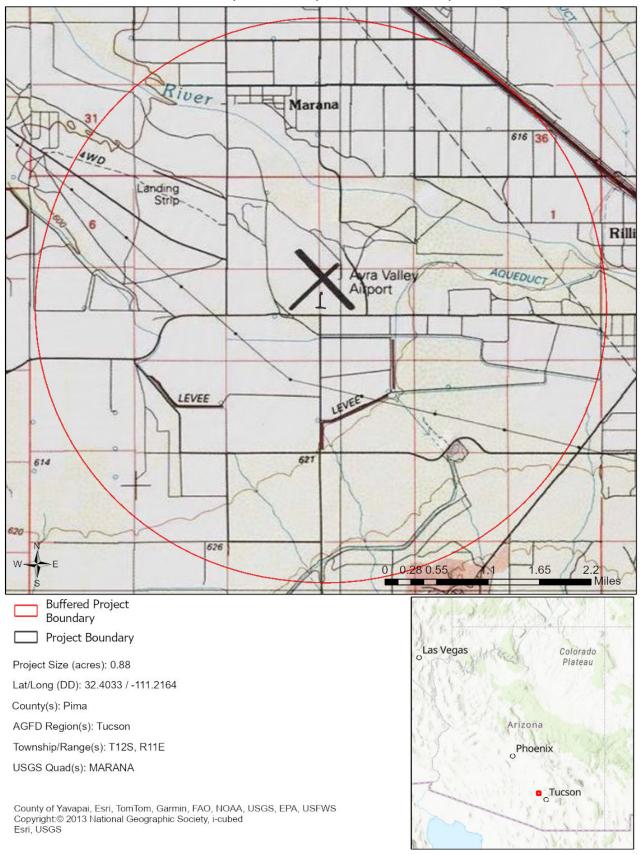
Project Evaluation Program, Habitat Branch Arizona Game and Fish Department 5000 West Carefree Highway Phoenix, Arizona 85086-5000 Phone Number: (623) 236-7600 Fax Number: (623) 236-7366

Or

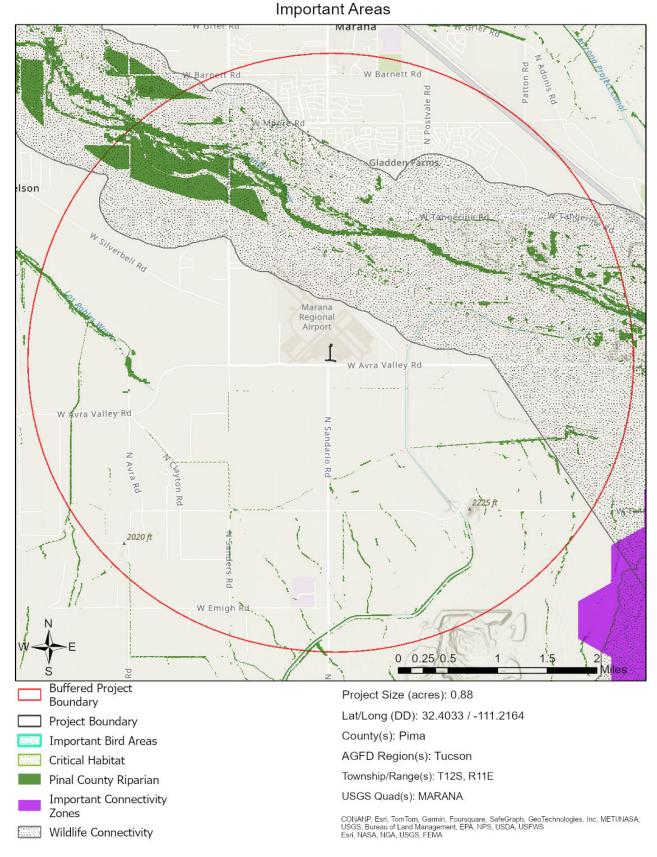
PEP@azqfd.gov

6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies.

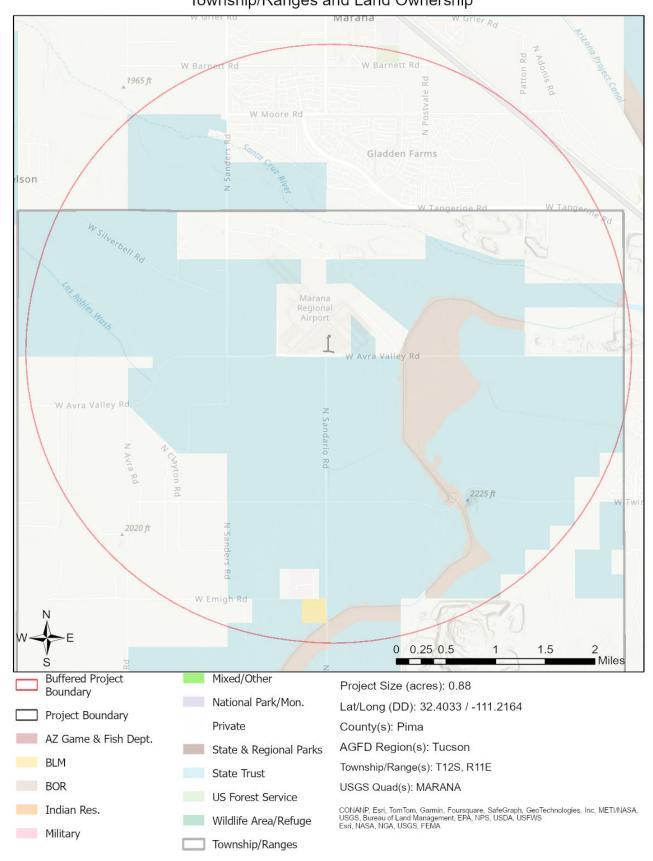
Marana Regional Airport Traffic Control Tower USA Topo Basemap With Locator Map



Marana Regional Airport Traffic Control Tower



Marana Regional Airport Traffic Control Tower Township/Ranges and Land Ownership



Special Status Species Documented within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Aspidoscelis sonorae	Sonoran Spotted Whiptail					2
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		2
Auriparus flaviceps	Verdin					2
Buteo swainsoni	Swainson's Hawk					2
Chionactis annulata	Resplendent Shovel-nosed Snake					
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S	S		1
Falco sparverius	American Kestrel					2
Glaucidium brasilianum cactorum	Cactus Ferruginous Pygmy-owl	LT	S	S		1
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S	S		1
Heloderma suspectum	Gila Monster					1
Incilius alvarius	Sonoran Desert Toad					2
Mammillaria thornberi	Thornber Fishhook Cactus				SR	
Melozone aberti	Abert's Towhee		S			2
Phrynosoma solare	Regal Horned Lizard					2
Phyllorhynchus browni	Saddled Leaf-nosed Snake					2

Note: Status code definitions can be found at https://www.azgfd.com/wildlife-action/on-the-ground-conservation/on-the-ground-conservation/state-wildlife-action-plan/state-wildlife-action-plan-status-definitions/.

No Special Areas Detected

No special areas were detected within the project vicinity.

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Ammodramus savannarum perpallidus	Western Grasshopper Sparrow					
Anaxyrus retiformis	Sonoran Green Toad			S		2
Anthus spragueii	Sprague's Pipit	SC				2
Aquila chrysaetos	Golden Eagle			S		2
Artemisiospiza nevadensis	Sagebrush Sparrow					
Asio otus	Long-eared Owl					2
Aspidoscelis sonorae	Sonoran Spotted Whiptail					2
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		2
Auriparus flaviceps	Verdin					2
Botaurus lentiginosus	American Bittern					2
Buteo regalis	Ferruginous Hawk	SC		S		2
Buteo swainsoni	Swainson's Hawk					2
Buteogallus anthracinus	Common Black Hawk					2
Calcarius ornatus	Chestnut-collared Longspur					2
Calypte costae	Costa's Hummingbird					2

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Campylorhynchus brunneicapillus	Cactus Wren					2
Charadrius montanus	Mountain Plover	SC				2
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)					
Colaptes chrysoides	Gilded Flicker			S		2
Columbina inca	Inca Dove					2
Cynanthus latirostris	Broad-billed Hummingbird		S			2
Dendrocygna autumnalis	Black-bellied Whistling-Duck					2
Empidonax wrightii	Gray Flycatcher					2
Eumops perotis californicus	Greater Western Bonneted Bat					
Falco mexicanus	Prairie Falcon					2
Falco peregrinus anatum	American Peregrine Falcon					
Falco sparverius	American Kestrel					2
Gastrophryne mazatlanensis	Sinoloan Narrow-mouthed Toad					
Glaucidium brasilianum cactorum	Cactus Ferruginous Pygmy-owl					
Gopherus morafkai	Sonoran Desert Tortoise	CCA	S	S		1
Heloderma suspectum	Gila Monster					1
Icterus bullockii	Bullock's Oriole					2
Incilius alvarius	Sonoran Desert Toad					2
Lanius Iudovicianus	Loggerhead Shrike	SC				2
Lasiurus blossevillii	Western Red Bat		S			2
Lasiurus xanthinus	Western Yellow Bat		S			2
Lepus alleni	Antelope Jackrabbit					2
Lithobates yavapaiensis	Lowland Leopard Frog	SC	S	S		1
Macrotus californicus	California Leaf-nosed Bat	SC		S		2
Megascops kennicottii	Western Screech-owl					
Melanerpes uropygialis	Gila Woodpecker					2
Melospiza lincolnii	Lincoln's Sparrow					2
Melozone aberti	Abert's Towhee		S			2
Micrathene whitneyi	Elf Owl					
Micruroides euryxanthus	Sonoran Coralsnake					2
Myotis velifer	Cave Myotis	SC		S		2
Myotis yumanensis	Yuma Myotis	SC				2
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					2
Parabuteo unicinctus	Harris's Hawk					2
Passerculus sandwichensis	Savannah Sparrow					2
Peucaea carpalis	Rufous-winged Sparrow					2
Phrynosoma solare	Regal Horned Lizard					2
Phyllorhynchus browni	Saddled Leaf-nosed Snake					2
Pooecetes gramineus	Vesper Sparrow					2

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Progne subis hesperia	Desert Purple Martin					
Spizella breweri	Brewer's Sparrow					2
Tadarida brasiliensis	Brazilian Free-tailed Bat					
Toxostoma bendirei	Bendire's Thrasher					2

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Odocoileus hemionus	Mule Deer					
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

Project Type: Transportation & Infrastructure, Airports, Construction of new runways, terminals/concourses, other facilities

Project Type Recommendations:

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife. Guidelines for many of these can be found

at: https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-wildlife-friendly-guidelines/.

Consider impacts of outdoor lighting on wildlife and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. Conduct wildlife surveys to determine species within project area, and evaluate proposed activities based on species biology and natural history to determine if artificial lighting may disrupt behavior patterns or habitat use. Use only the minimum amount of light needed for safety. Narrow spectrum bulbs should be used as often as possible to lower the range of species affected by lighting. All lighting should be shielded, canted, or cut to ensure that light reaches only areas needing illumination.

Consider tower designs and/or modifications that reduce or eliminate impacts to migratory birds (i.e. free standing, minimally lighted structures).

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (include spawning seasons), and to reduce spread of exotic invasive species. We recommend early direct coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

project_report_2_marana_regional_airport_t_65336_67235.pdf Review Date: 6/19/2024 02:36:31 PM

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

Based on the project type entered, coordination with State Historic Preservation Office may be required (https://azstateparks.com/).

Based on the project type entered, coordination with Arizona Department of Environmental Quality may be required (http://www.azdeq.gov/).

Based on the project type entered, coordination with U.S. Army Corps of Engineers may be required (http://www.usace.army.mil/).

Based on the project type entered, coordination with County Flood Control district(s) may be required.

Based on the project type entered, coordination with U.S. Fish and Wildlife Service (Migratory Bird Treaty Act) may be required (https://www.fws.gov/office/arizona-ecological-services).

The Department requests further coordination to provide project/species specific recommendations, please contact Project Evaluation Program directly at PEP@azgfd.gov.

Project Location and/or Species Recommendations:

HDMS records indicate that one or more native plants listed on the **Arizona Native Plant Law and Antiquities Act** have been documented within the vicinity of your project area. Please contact:

Arizona Department of Agriculture

1688 W Adams St. Phoenix, AZ 85007 Phone: 602.542.4373

https://agriculture.az.gov/sites/default/files/Native%20Plant%20Rules%20-%20AZ%20Dept%20of%20Ag.pdf starts on page 44

HDMS records indicate that one or more **Listed**, **Proposed**, **or Candidate** species or **Critical Habitat** (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at https://www.fws.gov/office/arizona-ecological-services or:

Phoenix Main Office

9828 North 31st Avenue #C3 Phoenix, AZ 85051-2517 Phone: 602-242-0210 Fax: 602-242-2513

Tucson Sub-Office

201 N. Bonita Suite 141 Tucson, AZ 85745 Phone: 520-670-6144 Fax: 520-670-6155

Flagstaff Sub-Office

SW Forest Science Complex 2500 S. Pine Knoll Dr. Flagstaff, AZ 86001 Phone: 928-556-2157

Fax: 928-556-2121

HDMS records indicate that **Sonoran Desert Tortoise** have been documented within the vicinity of your project area. Please review the Tortoise Handling Guidelines found at https://s3.amazonaws.com/azgfd-portal-wordpress/Portallmages/files/wildlife/2014%20Tortoise%20handling%20guidelines.pdf.

HDMS records indicate that **Western Burrowing Owls** have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at https://www.azgfd.com/wildlife-conservation/conservation-and-endangered-species-programs/burrowing-owl-management/.

APPENDIX C

AZGFD Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects – Revised September 22, 2014

GUIDELINES FOR HANDLING SONORAN DESERT TORTOISES ENCOUNTERED ON DEVELOPMENT PROJECTS

Arizona Game and Fish Department Revised September 22, 2014

The Arizona Game and Fish Department (Department) has developed the following guidelines to reduce potential impacts to desert tortoises, and to promote the continued existence of tortoises throughout the state. These guidelines apply to short-term and/or small-scale projects, depending on the number of affected tortoises and specific type of project.

The Sonoran desert tortoise occurs south and east of the Colorado River. Tortoises encountered in the open should be moved out of harm's way to adjacent appropriate habitat. If an occupied burrow is determined to be in jeopardy of destruction, the tortoise should be relocated to the nearest appropriate alternate burrow or other appropriate shelter, as determined by a qualified biologist. Tortoises should be moved less than 48 hours in advance of the habitat disturbance so they do not return to the area in the interim. Tortoises should be moved quickly, kept in an upright position parallel to the ground at all times, and placed in the shade. Separate disposable gloves should be worn for each tortoise handled to avoid potential transfer of disease between tortoises. Tortoises must not be moved if the ambient air temperature exceeds 40° Celsius (105° Fahrenheit) unless an alternate burrow is available or the tortoise is in imminent danger.

A tortoise may be moved up to one-half mile, but no further than necessary from its original location. If a release site or alternate burrow is unavailable within this distance, and ambient air temperature exceeds 40° Celsius (105° Fahrenheit), contact the Department for guidance. Tortoises salvaged from projects which result in substantial permanent habitat loss (e.g. housing and highway projects), or those requiring removal during long-term (longer than one week) construction projects, may be placed in the Department's tortoise adoption program. *Managers of projects likely to affect desert tortoises should obtain a scientific collecting license from the Department to facilitate handling or temporary possession of tortoises*. Likewise, if large numbers of tortoises (>5) are expected to be displaced by a project, the project manager should contact the Department for guidance and/or assistance.

Please keep in mind the following points:

- Use the Department's <u>Environmental On-Line Review Tool Department</u> during the planning stages of any project that may affect desert tortoise habitat.
- Unless specifically authorized by the Department, or as noted above, project personnel should avoid disturbing any tortoise.
- Take is prohibited by state law.
- These guidelines do not apply to Mojave desert tortoises (north and west of the Colorado River). Mojave desert tortoises are listed as threatened under the Endangered Species Act, administered by the U.S. Fish and Wildlife Service.
- These guidelines are subject to revision at the discretion of the Department.

APPENDIX D AZDA Notice of Intent to Clear Land Form



Arizona Department of Agriculture (AZDA)

Central Licensing

Physical Location: 1010 W Washington St., Phoenix, AZ 85007 Mailing Address: 1802 W Jackson St., #78 Phoenix, AZ 85007

Phone: (602) 542-6408 Fax: (602) 542-0466

Website: https://agriculture.az.gov Email: licensing@azda.gov

Notice of Intent to Clear Land

ARS § 3-904

Pursuant to A.R.S. § 3-904 the undersigned, as Owner of the Property described herein, gives this Notice of Intent to Clear Land of protected native plants.

1.	Owner/landowner's agent. The owner or landowner's agent of the Property upon which protected native plants will be affected Owner's Name
	Address
	Agent's NamePhone
	Address
2.	Property. The description and location of the Property upon which protected native plants will be affected:
	County
	Name of Property/Project
	Address
	Physical Location (attach map)
	(Note: Map must also show surrounding land for 1/2 mile in each direction)
	Tax Parcel ID Nos.
	Legal Description (or attach copy)
	Number of Acres to be Cleared
3.	Owner's Intent. Landowner's intentions when clearing private land of protected native plants.
	Owner intends to allow salvage of the plants, and agrees to be contacted by native plant salvagers.
	Owner intends to transplant the plants onto the same property, or to another property he also owns.
	Owner has already arranged for salvage of the plants.
	Owner does not intend to allow salvage of the plants.
	Other
1.	Approximate starting date. (See notice period listed on reverse side)
	The information contained in this application is true and accurate to the best of my knowledge. I understand that providing false information is a felony in Arizona
Sic	nature

 $Notice \ to \ salvagers: Consent \ of \ the \ landowner \ is \ required \ before \ entering \ any \ lands \ described \ in \ this \ notice.$

Explanation Of This Form

1. Notice of Intent to Clear Land.

The majority of the desert plants fall into one of four groups specially protected from theft, vandalism or unnecessary destruction. They include all of the cacti, the unique plants like Ocotillo, and trees like Ironwood, Palo Verde and Mesquite. In most cases the destruction of these protected plants may be avoided if the private landowner gives prior notice to the Arizona Department of Agriculture.

2. Notice Period.

When properly completed, this form is to be sent to the Department within the time periods described below. Landowners/developers are encouraged to salvage protected native plants whenever possible.

3. Information to Interested Parties.

The information in this notice will be posted in the applicable state office of the Department and mailed to those parties (salvage operators, revegetation experts) who have an interest in these plants and may approach the landowner with the possibility of saving the plant(s) from unnecessary destruction.

Notice to Landowner:

1. The owner may not begin destruction of protected native plants until he receives confirmation from the Arizona Department of Agriculture and the time prescribed below has elapsed. The "Confirmed" stamp only verifies that the Notice has been filed.

Size of area over which the Destruction of Plants will occur	Length of Notice Period
Less than one acre	20 days, oral or written
One acre or more, but less than 40 acres	30 days, written
40 acres or more	60 days, written

- 2. If you are clearing land over an area of less than one acre, oral notice may be given by calling the applicable state office at the telephone number given below.
- 3. If the land clearing or plant salvage does not occur within one year, a new Notice is required.

This Notice must be sent to the applicable state office of the Department of Agriculture at the address given below:

Central Licensing

Physical Location: 1010 W Washington St., Phoenix, AZ 85007 Mailing Address: 1802 W Jackson St., #78 Phoenix, AZ 85007

Email: licensing@azda.gov

Notice to salvagers: Consent of the landowner is required before entering any lands described in this notice.

APPENDIX C

National Historic Preservation Act Consultation



Federal Aviation Administration

SHPO-2024-0427 (174771)

Western-Pacific Region Airports Division Phoenix Airports District Office 3800 N. Central Avenue Suite 1025, 10th Floor Phoenix, AZ 85012

Rec: 05-03-24

May 3, 2024

VIA EMAIL (azshpo@azstateparks.gov)

Ms. Kathryn Leonard State Historic Preservation Officer Arizona State Parks 1110 West Washington Street, Suite 100 Phoenix, AZ 85007

Subject: Proposed Federal Financial Assistance and Airport Layout Plan Change for an Air Traffic Control Tower at Marana Regional Airport, Marana, Pima County, Arizona

Dear Ms. Leonard:

The Federal Aviation Administration (FAA), in coordination with the Town of Marana (Sponsor), considered the potential effects on historic properties of responding to a grant application and Airport Layout Plan change request for a new Air Traffic Control Tower at Marana Regional Airport in Marana, Arizona as required by Section 106 of the National Historic Preservation Act. The FAA combined multiple steps in the process, per 36 CFR 800.3(g), and seeks your agreement to continue to do so for this undertaking type. The FAA found that this undertaking would result in **no adverse effect**. The FAA provides this documentation (Enclosures 1–7) and seeks your concurrence.

Description of the Undertaking

The FAA proposes to support the Sponsor's project by:

- funding airport improvements eligible under the Airport Improvement Program, the Bipartisan Infrastructure Law, or both; and
- unconditionally approving changes to the Airport Layout Plan to the extant authorized by Section 163 of the 2018 Reauthorization Act.

The Sponsor's project, shown on Enclosure 1, entails:

- constructing an air traffic control tower standing 112 feet tall (123 feet tall including antennae, rotating beacon, and lightning rods), with an octagonal cab measuring 28 feet across atop a square shaft measuring 24 by 24 feet, and a concrete pier-and-beam foundation composed of 9, 3.5-foot-diameter piers extending 35 feet deep;
- constructing a one-story-tall, 1,015-square-foot building located at the tower's base on a foundation consisting of a 1-foot-thick slab and 2-foot-deep footings;

- constructing an asphalt-paved parking lot located next to the new building measuring 42 feet wide by 139 feet long (5,838 square feet total) and 10 inches deep including the aggregate base course;
- constructing a north-south-oriented, asphalt-paved, access road leading to the new tower measuring 20 feet wide by 692 feet long (13,840 square feet total) and 10 inches deep including the aggregate base course;
- constructing an east-west-orientated, asphalt-paved, access road extension measuring 24 feet wide by 548 feet long (13,152 square feet total) and 10 inches deep including the aggregate base course;
- installing an underground septic system for the new tower and building composed of
 - o a 100-foot-long sewer pipe placed in 1.5-foot-wide, 6-foot-deep trench;
 - o a 6-foot-wide, 10-foot-long septic tank placed in an 8-foot-deep hole; and
 - o a 49-foot-wide, 69-foot-long leach field (3,381 square feet total) created in a 6-foot-deep excavation;
- installing underground utility connections to the new tower and building, such as
 - o electric, gas, and telecommunication lines in a single, 1.5-foot-wide, 1,240-foot-long, and 3.5-foot-deep trench; and
 - o a water line in a separate, 1.5-foot-wide, 260-foot-long, and 4-foot-deep trench;
- removing the existing rotating beacon and its 50-foot-tall tower, but leaving its concrete slab foundation in place;
- installing the rotating beacon on top of the new tower; and
- operating and maintaining these facilities.

During construction, the Sponsor would designate two temporary equipment and materials storage areas as shown on Enclosure 1. One would occur in the proposed leach field's location, and the other southeast of the new parking lot, which was recently used during construction of a nearby hangar. The construction contractor would use the identified temporary haul route shown on Enclosure 1 as well as existing gravel and paved roads in their existing condition to reach work areas.

The Sponsor proposes to start construction in January 2026 and finish by November 2026. Construction activities would occur Monday through Friday during daylight hours; night-time work isn't planned. Once constructed, the Sponsor plans to operate the tower seven days a week from 6:00 AM to 10:00 PM, although these hours may change depending on air traffic safety.

Undertaking Location and Area of Potential Effects Delineation

Marana Regional Airport is located at 11700 West Avra Valley Road, 5 miles west of Interstate 10, in Marana, Pima County, Arizona. It is surrounded by agricultural fields and undeveloped desert on the south bank of the Santa Cruz River. The airport occurs within portions of Sections 3, 4, 9, and 10 in Township 12 South, Range 11 East on the Gila and Salt River Baseline and Meridian. The corresponding topographic map is called Marana, Arizona. The proposed tower location occurs within the airport's south half, 1,120 feet south the runways' intersection, and on a 0.9-acre portion of Sponsor-owned land (Enclosure 2).

The FAA established the undertaking's Area of Potential Effect (APE) as a 3-mile-radius around the proposed tower location. A casual observer within this area would likely notice the new tower because it would be the tallest building within sight; beyond this distance, it wouldn't be discernible from other landscape features in terms of lines, colors, and textures. The undertaking's footprint, which is where ground-disturbing activities both temporary and permanent would occur, covers 7.58 acres (Enclosures 3 and 4). Photographs of the proposed tower location are shown in Enclosure 7.

Resource Identification Methods and Results

The Sponsor conducted the following identification efforts:

- In 2022, archaeologists surveyed the undertaking's footprint for an unrelated apron reconstruction project and conducted background research on a one-mile radius area that covered the entire airport. The resulting report is called *Cultural Resources Survey for the Marana Regional Airport Hangar Apron Reconstruction Project, Pima County, Arizona*, prepared by Eric Peterson, and dated May 2022. Archaeological sites weren't identified within the current undertaking's footprint (Enclosure 5, Appendix A).
- In 2024, archaeologists conducted background research for the undertaking's APE and conducted a Class III pedestrian survey of approximately 4.1 acres within the undertaking's footprint that hadn't been previously surveyed. The resulting report is titled *Cultural Resources Archival Review and Survey for the Proposed Marana Air Traffic Control Tower Project at the Marana Regional Airport in Pima County, Arizona,* prepared by David Barr, and revised in April 2024 (Enclosure 5). This research showed that 50 percent of the APE was previously surveyed and 62 prehistoric or historic-period resources were recorded. In Enclosure 5, these sites are summarized in Table 2 on Pages 7–12 and depicted on Figures 3a–3d.
- In 2024, architectural historians conducted archival research and fieldwork for historical resources present at the airport. The resulting report is named *Built Environment Evaluation for the Marana Air Traffic Control Tower Project at the Marana Regional Airport in Pima County, Arizona*, prepared by Annie Jay Lutes, and revised in April 2024 (Enclosure 6). This research revealed three hangars and a district dating to the late 1960s. In Enclosure 6, these buildings are described in detail on Pages 38–42, their locations are depicted in Figure 26, and their Arizona Historic Property Inventory Forms presented in Appendix A.

Concurrent with your office's review, the FAA is following FAA Order 1210.20 *American Indian and Alaska Native Tribal Consultation Policy and Procedures* dated January 28, 2004, regarding this undertaking. The FAA will inform your office about any disagreements with or changes to the identification efforts, resource evaluations, or effect findings that result from tribal consultation.

In 2017, the Sponsor solicited input from the public on proposed airport improvements, including adding a tower, at a public meeting on the airport's master plan update. The Marana Town Council also discussed the master plan update during a separate public meeting. Objections or concerns about the proposed tower weren't received during these meetings.

Resource Evaluations

The FAA makes the following eligibility determinations in terms of the criteria for inclusion in National Register of Historic Places (Register).

For the 62 previously recorded resources, 20 were previously determined or recommended as Register eligible under Criterion D (Information Potential), 12 were recommended or determined Register ineligible under any criterion, and 30 weren't evaluated (Enclosure 5 Table 2). The FAA doesn't have any new information relevant to these resources' Register-eligibility status. The FAA proposes to treat unevaluated resources as Register eligible for purposes of this consultation.

For the four newly recorded resources, the three hangars (i.e., Buildings 10, 17, and 19) are Register ineligible under any criterion because they lack historical significance (Enclosure 6 Pages 36–42, Table 1). The district, Marana Regional Airport, is Register ineligible under any criteria because it lacks historical significance and integrity (Enclosure 6 Pages 42–43, Table 1).

Effect Finding

The FAA finds **no adverse effect** for this undertaking. Historic properties aren't present in the undertaking's footprint where ground-disturbing activities are planned. Historic properties are present within other portions of the APE where the proposed tower would introduce a visual change. However, the undertaking wouldn't diminish historic properties' integrity of setting or feeling because of the proposed tower's size relative to the historic properties' locations, which are 0.5 to 3.0 miles away (see Enclosure 5 Table 2).

Looking Ahead

If an unknown cultural resource or an unidentified impact to a known cultural resource is encountered during the undertaking, then the Sponsor would direct the construction contractor to immediately stop work within 100 feet of the discovery, secure the area, and arrange for a qualified professional to evaluate it and make treatment recommendations. The Sponsor would notify the FAA and your office as soon as possible. The Sponsor would also notify the Arizona State Museum if the discovery involves human remains. The Sponsor wouldn't allow work to resume in the discovery area until notified by the FAA and in case of human remains, the Arizona State Museum as well.

Please concur with the FAA's APE delineation, identification efforts to date, resource evaluations, and effect finding for the proposed air traffic control tower undertaking located at Marana Regional Airport. If you have any questions, please contact me at (602) 792-1066 or email matthew.h.bilsbarrow@faa.gov.

Sincerely,

MATTHEW H BILSBARROW Date: 2024.05.03 15:00:47

Digitally signed by MATTHEW H **BILSBARROW**

Matthew H. Bilsbarrow, RPA **Environmental Planner**

7 Enclosures

cc. (w/Enclosures 1–4, 7):

Greg Sendlak (gsendlak@maranaaz.gov)

Charlie McDermott (charlie.mcdermott@dibblecorp.com)

Kyler Erhard (kyler.erhard@faa.gov)

Ryan Spicer (ryan.n.spicer@faa.gov)

SHPO concurs on the APE delineation, identification efforts, determinations of eligibility, and finding of No Adverse Effect for this undertaking.

Zimmerman, M.A.

Archaeological Compliance Specialist Arizona State Historic Preservation Office May 21, 2024

APPENDIX D

Community Statistics

Community Statistics

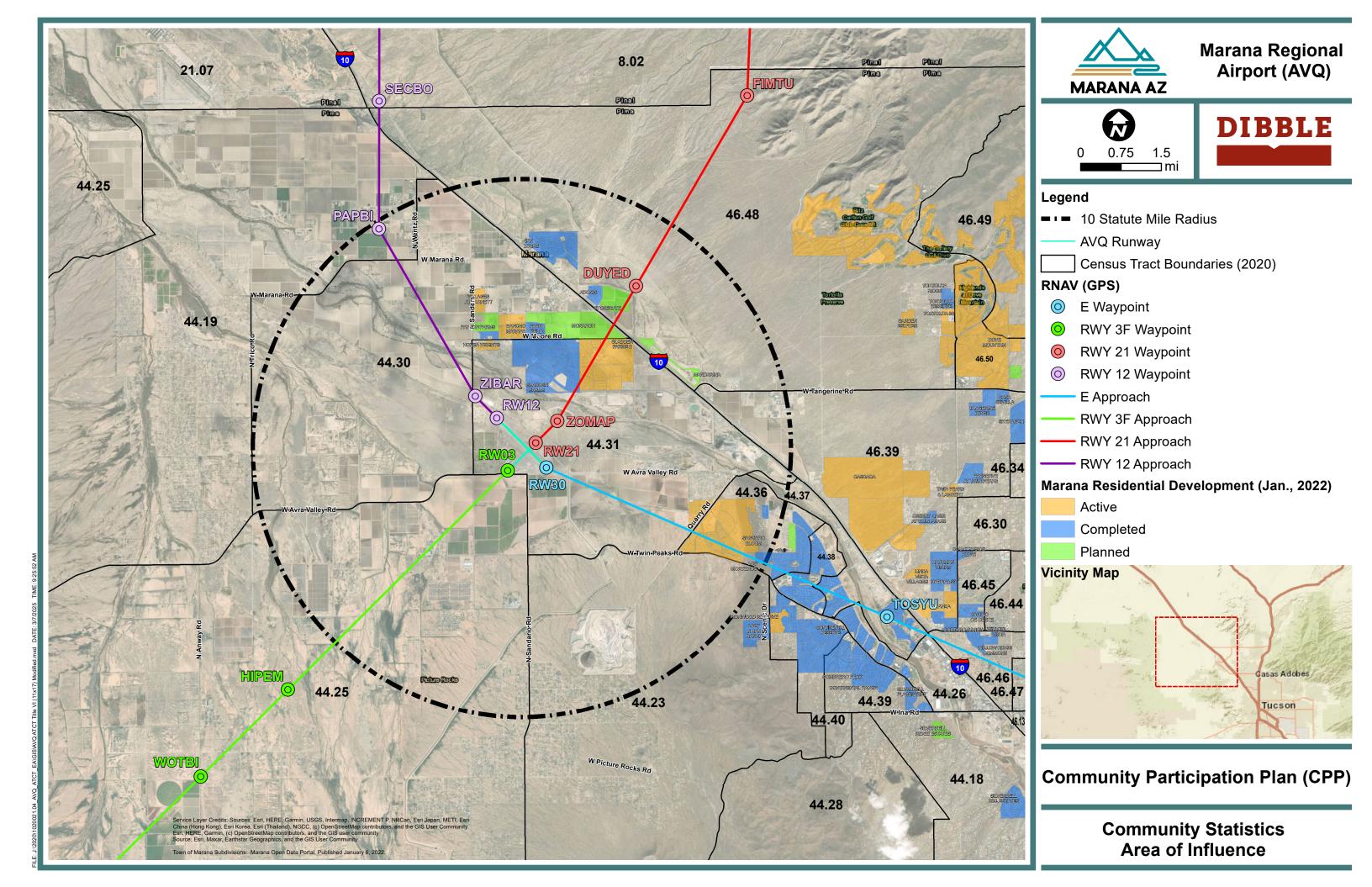
Affected Communities ³	Total Population
Census Tract 44.19 – Rural	6,564
Census Tract 44.30 - Rural	3,020
Census Tract 21.07 - Rural	3,917
Census Tract 46.48 – Stonegate, Monarch, Gladden	
Farms II	7,028
Census Tract 46.49 - Rural	2,048
Census Tract 08.02 - Rural	6,052
Census Tract 44.25 - Rural	5,461
Census Tract 44.23 - Rural	4,155
Census Tract 44.26 - Continental Reserve	2,632
Census Tract 44.36 - Saguaro Bloom	4,422
Census Tract 44.37 - Continental Reserve	3,384
Census Tract 44.38 - Continental Reserve	3,558
Census Tract 44.39 – Sombrero Peak, Continental	
Ranch	3,168
Census Tract 44.40 - Continental Reserve	4,669
Census Tract 46.39 - Cascada	5,085
Census Tract 46.46 - Willow Ridge Commons	4,416
Census Tract 46.47 - Orangewood Estates	3,825

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³ "Affected communities" means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path.

Appendix D

Area of Influence – Community Statistics



APPENDIX E

Visual Resources Analysis



Visual Character Analysis for the Marana Regional Airport Air Traffic Control Tower Project

AUGUST 2024

PREPARED FOR

Town of Marana, Arizona

PREPARED BY

SWCA Environmental Consultants

VISUAL CHARACTER ANALYSIS FOR THE MARANA REGIONAL AIRPORT AIR TRAFFIC CONTROL TOWER PROJECT

Prepared for

Town of Marana, Arizona 5100 W. Ina Road Marana, Arizona 85743

SWCA Environmental Consultants

343 W Franklin Street Tucson, Arizona 85701 www.swca.com

SWCA Project No. 61913

1 INTRODUCTION

This visual character analysis (analysis) was prepared to support the Town of Marana, Arizona's (Applicant's) Environmental Assessment (EA) for the construction and operation of an air traffic control tower (ATCT; Project) at the Marana Regional Airport (MRA). This analysis describes the anticipated effects of the Project on the visual character of the surrounding area, including 1) a description of the nature of the existing visual character and identified visual resources, 2) an evaluation of potential visual impacts based on photo simulations from selected critical viewpoints, and 3) an assessment of the Project's effects on visual character due to light emissions.

2 METHODS

2.1 Regulatory Context

This analysis followed the guidelines for conducting an EA established by Federal Aviation Administration (FAA) Order 1050.1F, which calls for the Applicant to consider the extent to which the Proposed Action would have the potential to:

- Affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources:
- Contrast with the visual resources and/or visual character in the study area; and
- Block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations (FAA 2015).

In addition to consideration for effects on visual character, FAA Order 1050.1F requires applicants to assess the effects on visual character resulting from project light emissions. Specifically, applicants must consider the extent to which the action (i.e., the Project) would have the potential to:

- Create annoyance or interfere with normal activities from light emissions; and
- Affect the visual character of the area due to the light emissions, including the importance, uniqueness, and aesthetic value of the affected visual resources (FAA 2015).

2.2 Visual Effects Analysis Process

The area of visual effect (AVE) was established using a distance of 3 miles from the ATCT for this analysis, which is based on the proposed height of the ATCT, and to consider views from a variety of surrounding locations and contexts. In accordance with the requirements described in Section 2.1, this analysis consisted of the following steps: 1) identify and describe the existing visual character surrounding the MRA, including important and valued visual resources, 2) select critical and typical viewpoints, referred to as key observation points (KOPs), which are locations from which the Project may be visible from publicly accessible and/or visually valued areas, 3) develop photo-realistic simulations representing the Project as it would appear from the selected viewpoints, and 4) based on the results of the photo simulations, evaluate potential impacts to views as a result of the Project, considering both effects on visual character and the effect of light emissions.

3 EXISTING CONDITIONS

For clarity, this section is subdivided into the two categories established by FAA Order 1050.1F: 1) visual character and 2) light emissions.

3.1 Visual Character

Geographically, the MRA and Project fall within the Arizona Upland/Eastern Sonoran Basin U.S. Environmental Protection Agency Level IV ecoregion, which is characterized by broad open plains situated between the higher relief mountain ranges of the Eastern Sonoran Mountains. Vegetation within this area is uniformly scattered throughout undeveloped areas; types include creosote bush and bursage, with foothills palo verde and desert ironwood also present (Griffith et al. 2014). When present, the natural vegetation can screen outward views from roadways and pedestrian areas. The narrowly braided channel of the Santa Cruz River, lined with concentrated vegetation, runs west through the landscape north of the MRA.

The landscape around the MRA is rural, with large areas of undeveloped lands administered by Arizona State Land Department and agricultural fields. The nearest residential land uses are about 1.2 miles northwest of the Project, and extensive residential development is also at least 1.6 miles northeast of the Project, including the Gladden Farms neighborhood. Prominent visual features within the MRA include numerous large rectangular-shaped hangars, a terminal building, exterior auto and aircraft parking areas, maintenance yards, and fuel tanks.

Important or visually valued resources identified as having potential views of the Project include the Santa Cruz River Trail, a paved, off-street bicycle and pedestrian trail amenity located north of and parallel to the Santa Cruz River. Notably, the improved Santa Cruz River Trail within the Town of Marana follows the recognized alignment of the Juan Bautista de Anza National Historic Trail (NHT), the 1,200-mile route of an eighteenth-century expedition from Sonora, Mexico to San Francisco, California (National Park Service 2020).

3.1.1 Key Observation Points

The KOPs, identified in coordination with the FAA and the Applicant, represent views of the Project by people using identified important sites and recreational areas, views from the nearest residential areas, and typical views from vehicles traveling along major roadways where the Project would be seen (Table 1; see Figure 1). Photo simulations depicting views of the Project from each KOP are presented in Attachment A.

Table 1. Identified Key Observation Points

KOP Number	Location	Distance to Project (in miles)	View Direction	Area or Resource KOP Represents
1*	West Avra Valley Road at Sandario Road	0.23	North	Typical foreground view from the major roadway intersection nearest to the Project
2	West Avra Valley Road	0.42	West	Typical west-facing view from roadway adjacent to the MRA and proposed ATCT location
3	North Sanders Road	1.23	Southeast	Rural-residential area nearest to the Project

KOP Number	Location	Distance to Project (in miles)	View Direction	Area or Resource KOP Represents
4	Santa Cruz River Trail			The Santa Cruz River Trail and residential areas northwest of the Project. Within Marana and continuing south through Tuscon, the Santa Cruz River Trail is part of a larger locally improved multiuse path that follows the alignment of the 1,200-mile federally designated Juan Bautista de Anza NHT.

^{*} Photo simulations representing views from KOP 1 were created for both midday and night-time conditions.

3.2 Light Emissions

The MRA and its surroundings are illuminated by various types of lighting, mainly used for safety and security of airport operations and/or nighttime use of airport facilities. The MRA has approach lights, terminal area pedestrian and site lighting (such as parking lot lights and exterior and interior building lighting), runway and taxiway lighting, including illuminated signage, and obstruction lighting. Many buildings within the MRA, including the hangars, have bright exterior lighting affixed at the roof peak and at access doors. Additionally, the MRA has a rotating beacon (height approximately 51 feet) affixed to a steel lattice tower located northeast of the terminal. In accordance with aviation standards, the beacon consists of two oppositely oriented lamps, one white-colored and one green. Based on fieldwork conducted for this analysis, the existing beacon is visible from locations along West Avra Valley Road, portions of North Sanders Road, and discrete locations along the Santa Cruz River Trail. Outside of the MRA, intermittent overhead street lighting was observed along West Avra Valley Road at intersections with other major roadways, such as North Sandario Road, North Sanders Road, and others within the AVE. See Attachment A for photos of typical nighttime lighting at the MRA seen from West Avra Valley Road.

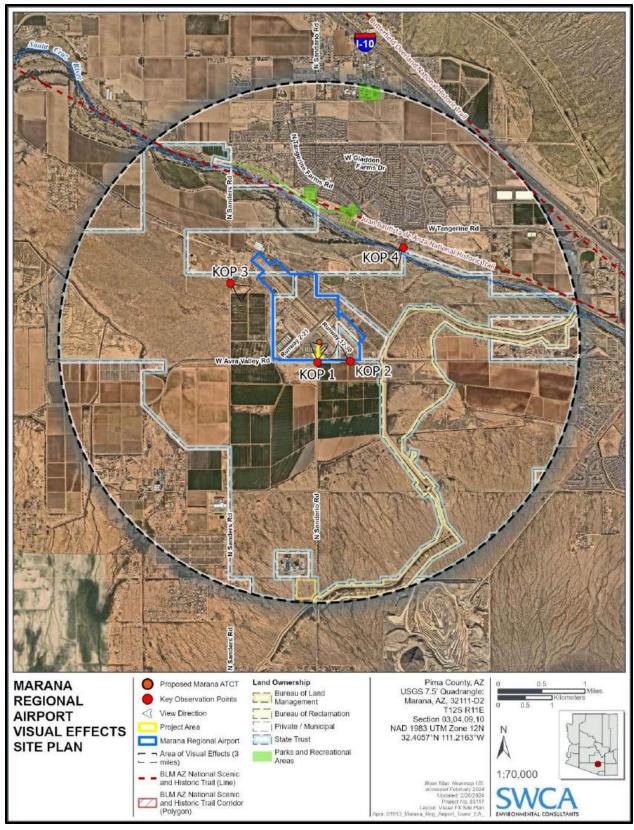


Figure 1. Project area and key observation points.

4 ENVIRONMENTAL CONSEQUENCES

The results of this analysis are presented in this section, including discussions addressing potential modifications to visual character and the effects of the Project's night lighting.

4.1 Visual Character

Photos showing existing conditions in the Project area and photo simulations of the Project prepared for each KOP view are provided in Attachment A. Impacts to KOP views resulting from the Project are listed in Table 2.

Table 2. Effects on Views at KOPs

KOP Number	Description of Effects
1 (Daytime)	Facing north from West Avra Valley Road at North Sandario Road, the proposed ATCT would be noticeable to viewers because it would be the tallest structure in the foreground of the view. However, the proposed ATCT is visually compatible with the existing airport hangars. The colors, textures, lines, and forms of the Project are similar to the neighboring airport structures; therefore, visual contrast introduced by the Project is weak. Visual character of the view from KOP 1 is not adversely altered, and the Project does not block or obstruct visual resources
1 (Nighttime)	This view represents the typical north-facing nighttime appearance of the MRA near the Project. As shown in the photo simulation, interior stairwell lights (required for user safety) within the shaft of the ATCT are seen as a column of small and softly illuminated rectangles. Additionally, the rotating beacon light (represented in the photo simulation at the point in time when the green lamp faces the viewer) would attract attention in the view from KOP 1, due to its prominent height on top of the tower and its rotation, which is perceived by the viewer as a blinking light alternating green and white in color. However, as shown in the existing photo in Attachment A, the beacon is a prominent existing illumination feature within MRA; therefore, the Project does not significantly alter existing views from West Avra Valley Road or introduce additional visual contrast as a result of the relocated beacon.
2	KOP 2 represents the view facing northwest showing the MRA as seen from West Avra Valley Road. The Project would be briefly noticeable to travelers on West Avra Valley Road because a full line of sight to the ATCT occurs at this KOP location; no intervening structures or vegetation obscure the view. In the context of the visible hangars and development within the MRA, the ATCT is compatible with the visual character and presents weak contrast. The Project does not block or obstruct visual resources.
3	KOP 3 represents the view facing southeast toward the ATCT from a loose cluster of rural residential properties located off North Sanders Road. As shown in the photo simulation, the ATCT is visible, but it does not attract attention due to the viewing distance (1.23 miles) and intervening vegetation. As seen from KOP 3, the existing visual character is maintained, and the Project presents negligible visual contrast. The Project does not block or obstruct visual resources.
4	KOP 4 represents the view facing southwest from an off-street segment of the Santa Cruz River Trail. As shown in the photo simulation, the ATCT is visible, but is visually absorbed by the landscape due to the viewing distance (1.46 miles) and dense, mixed vegetation between the viewer and the ATCT. As seen from KOP 4, which represents views toward the Project from the Santa Cruz River Trail and corresponding Juan Bautista de Anza NHT, the visual character of the landscape is maintained, and visual contrast presented by the Project is negligible. Fieldwork conducted for this analysis demonstrated that concentrated vegetation along the Santa Cruz River between the Trail and the Project would frequently screen direct views of the ATCT from users on the Trail. Other potential viewpoints along the Santa Cruz River Trail identified for this analysis and visited during fieldwork determined that vegetation blocked views of the ATCT. Where it is visible, the Project does not block or obstruct visual resources.

Based on the results of the photo simulations and determinations presented in Table 2, the Project would not significantly alter, contrast with, or obstruct existing views.

4.2 Light Emissions

The Applicant proposes to relocate the existing MRA beacon light from its current location on a freestanding steel tower to the top of the ATCT cab, as represented in the photo simulations (see Attachment A). Similar to existing conditions, the rotating beacon would be intermittently visible from areas surrounding the MRA, including portions of West Avra Valley Road to the south, North Sanders Road to the west, and isolated locations northwest of the Project. The Project beacon would be similar in brightness and motion to the existing beacon, but would be positioned at a higher altitude (approximately 120 feet high on top of the ATCT cab) and as a result, the beacon could be visible from more locations within the AVE. However, the higher position of the beacon, in combination with its lamp angle (approximately 5 degrees above horizontal), would result in the beacon light being above and directed upward as seen by most viewers, meaning the light would not be directly oriented toward viewers. For this reason, and considering the existing presence and visibility of the beacon light in combination with the distance from the beacon to the nearest residential or recreational areas (at least 1.23 miles), the Project would not interfere with normal activities from light emissions and would not be expected to adversely affect the visual character of the area, including the importance, uniqueness, and aesthetic value of the area.

5 LITERATURE CITED

- Federal Aviation Administration (FAA). 2015. Order 1050.1F [Subj: Environmental Impacts: Policies and Procedures]. Available at: https://www.faa.gov/documentlibrary/media/order/faa_order_1050_1f.pdf. Accessed December 2023.
- Griffith, G.E., Omernik, J.M., Johnson, C.B., and Turner, D.S. 2014. Ecoregions of Arizona (poster): U.S. Geological Survey Open-File Report 2014-1141, with map, scale 1:1,325,000. Available at: https://gaftp.epa.gov/EPADataCommons/ORD/Ecoregions/az/az_front.pdf. Accessed January 2024.
- National Park Service. 2020. Juan Bautista de Anza National Historic Trail AZ, CA. Available at: https://www.nps.gov/juba/index.htm. Accessed January 2024.

Visual Character Analysis for the Marana Regional Airport Air Traffic Control Tower Project					
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ATTACHMENT A Photo Simulations



Date: **1-13-24**

Photo Time:

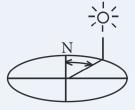
8:23 am

Visibility:



Air Quality: Good

Sun Azimuth:



115.03°

Sun Angle:

-0.98°

Lighting Angle on Project:

Side Lit

Wind:

9 mph

Cloud Cover:

0 %

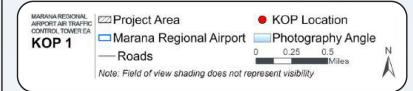
Temperature (°F):

38°F

Simulation was prepared using information provided by client. Locations, colors, and heights may vary based on final engineering and design.

Marana Regional Airport Air Traffic Control Tower





Approximate Distance to Control Tower

0.23 mile

Project Location





KOP 1 - Intersection of West Avra Valley Road and North Sandario Road

Base Photographic Documentation Latitude, Longitude (°):

32.40227, -111.21662

Viewpoint Elevation (feet):2,077

Camera Height (meters): 1.5

Camera Heading (degrees):

5

Camera Make & Model:

Canon EOS 5D Mark IV Camera Sensor Size (mm):

36 x 24 Full Frame

Crop Factor:

N/A

Lens Make & Model:

AF-P Nikkor

Lens Focal Length (mm):

50

Image Size (pixels):

6720 x 4480

Single frame simulation approximates 50mm full frame equivalent.







KOP 1: View from Intersection of West Avra Valley Road and North Sandario Road looking north - Simulated Condition



Date:

1-12-24

Photo Time:

9:04 pm

Visibility:

Good

Air Quality: Good

Moon Phase:



Waxing Crescent Moon



Lunar Angle (degrees): -20

Wind:

0 mph

Cloud Cover:

25 %

Temperature (°F):

43°F

Simulation was prepared using information provided by client. Locations, colors, and heights may vary based on final engineering and design.

Marana Regional Airport Air Traffic Control Tower





Approximate Distance to Control Tower

Existing MRA Beacon

0.23 mile

Extent of Single Frame Simulation

Project Location





KOP 1 (Night) - Intersection of West Avra Valley Road and North Sandario Road

Base Photographic Documentation

Latitude, Longitude (°):

32.40227, -111.21662

Viewpoint Elevation (feet):2,077

Camera Height (meters): 1.5

Camera Heading (degrees):

5

Camera Make & Model:

Canon EOS 5D Mark IV Camera Sensor Size (mm):

36 x 24 Full Frame

Crop Factor:

N/A

Lens Make & Model:

AF-P Nikkor

Lens Focal Length (mm):

50

Image Size (pixels):

6720 x 4480

Single frame simulation approximates 50mm full frame equivalent.







KOP 1: View from Intersection of West Avra Valley Road and North Sandario Road looking north - Simulated Condition



Date:

1-13-24 Photo Time:

0.11

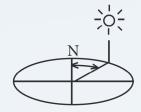
8:11 am

Visibility:



Air Quality: Good

Sun Azimuth:



113.6°

Sun Angle:

-3.1°

Lighting Angle on Project:

Front Lit

Wind:

10 mph

Cloud Cover:

0 %

Temperature (°F):

37°F

Simulation was prepared using information provided by client. Locations, colors, and heights may vary based on final engineering and design.

Marana Regional Airport Air Traffic Control Tower





Approximate Distance to Control Tower

0.42 mile

Project Location





KOP 2 - West Avra Valley Road

Base Photographic Documentation Latitude, Longitude (°):

32.40248, -111.21013

Viewpoint Elevation (feet):2,075

Camera Height (meters): 1.5

Camera Heading (degrees):

300

Camera Make & Model:

Canon EOS 5D Mark IV Camera Sensor Size (mm):

36 x 24 Full Frame

Crop Factor:

N/A

Lens Make & Model:

AF-P Nikkor

Lens Focal Length (mm):

50

Image Size (pixels):

6720 x 4480

Single frame simulation approximates 50mm full frame equivalent.









Date: 1-13-24

Photo Time:

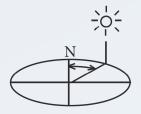
9:01 am

Visibility:



Air Quality: Good

Sun Azimuth:



120.26°

Sun Angle:

6.14°

Lighting Angle on Project:

Back Lit

Wind:

8 mph

Cloud Cover:

0 %

Temperature (°F):

39°F

Simulation was prepared using information provided by client. Locations, colors, and heights may vary based on final engineering and design.

Marana Regional Airport Air Traffic Control Tower





Approximate Distance to Control Tower

1.23 miles

Project Location





KOP 3 - North Sanders Road

Base Photographic Documentation Latitude, Longitude (°):

32.41543, -111.23382

Viewpoint Elevation (feet):2,035

Camera Height (meters): 1.5

Camera Heading (degrees):

125

Camera Make & Model:

Canon EOS 5D Mark IV Camera Sensor Size (mm):

36 x 24 Full Frame

Crop Factor:

N/A

Lens Make & Model:

AF-P Nikkor

Lens Focal Length (mm):

50

Image Size (pixels):

6720 x 4480

Single frame simulation approximates 50mm full frame equivalent.







Sun and Weather



Date: **1-13-24**

Photo Time:

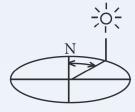
10:19 am

Visibility:



Air Quality: Good

Sun Azimuth:



132.96°

Sun Angle:

19.4°

Lighting Angle on Project:

Side Lit

Wind:

7 mph

Cloud Cover:

0 %

Temperature (°F):

47°F

Simulation was prepared using information provided by client. Locations, colors, and heights may vary based on final engineering and design.

Marana Regional Airport Air Traffic Control Tower





Approximate Distance to Control Tower

1.46 miles

Project Location





KOP 4 - Santa Cruz River Path

Base Photographic Documentation Latitude, Longitude (°):

32.42147, -111.19970

Viewpoint Elevation (feet):2,034

Camera Height (meters): 1.5

Camera Heading (degrees):

220

Camera Make & Model:

Canon EOS 5D Mark IV Camera Sensor Size (mm):

36 x 24 Full Frame

Crop Factor:

N/A

Lens Make & Model:

AF-P Nikkor

Lens Focal Length (mm):

50

Image Size (pixels):

6720 x 4480

Single frame simulation approximates 50mm full frame equivalent.

Viewing Instructions: Printed at 100% the resulting simulation is 16 inches wide by 10 inches high. At this size and focal length, the simulation should be viewed at arms length (24 inches). If viewed on a computer monitor, scale should be 100%.







APPENDIX F

Section 4(f) Coordination



May 3, 2024

Juan Bautista de Anza National Historic Trail 440 Civic Center Plaza, Ste 300 Richmond, CA 94804 Submitted via email to: juba info@nps.gov

Re: Scoping for Parks, Refuges, and Historic Sites – A Proposed Control Tower at Marana Regional Airport

To whom it may concern,

The Town of Marana is designing a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona (Figures 1 and 2). Funding and authorization of the project will require approval through the Federal Aviation Administration (FAA) and an amendment to the approved airport layout plan. Because the proposed project requires review and approval from the FAA (a federal agency), review under the National Environmental Policy Act (NEPA) is required. The NEPA review for projects through the FAA includes a review of potential impacts to properties subject to Section 4(f) of the Department of Transportation Act of 1966, including owned public parks, recreation areas, and wildlife or waterfowl refuges, or any publicly or privately owned historic site listed in or eligible for the National Register of Historic Places.

We invite you to review the information provided about the project and confirm presence/absence of any Section 4(f) properties managed by the National Park Service within 3 miles of the project (i.e., the area of potential effects [APE]) (see Figure 2). In addition, please let us know if you or others in your agency have any other specific concerns, suggestions, or recommendations pertaining to this project. This may include information on future development, general plans, or capital improvement projects that would be affected, to name a few. We are also interested in any information you can provide about Arizona State Park grants, or National Park Service grant projects located within this area. Please also let us know if there are other officials with jurisdiction over the resources in this area that we should contact.

The Town of Marana has conducted a review of parks and trails in the vicinity and prepared an archaeology and historic built environment report to identify Section 4(f) properties. In addition, we have prepared a visual resources analysis that identifies existing and simulated future-project buildout views from key observation points within 3 miles of the project, including views from the Santa Cruz River Path (see Appendix A, Key Observation Points [KOP] 4 simulations from the Santa Cruz Trail towards the proposed tower). The closest recreation facilities identified are the Santa Cruz River Park (which coincides with a section of the designated corridor of the Juan Bautista de Anza National Historic Trail), Gladden Farms Community Park, and Heritage River Park; all are located between 1.5 and 2 miles north of the project area.

The proposed project would include construction of a new air traffic control tower at AVQ to manage and direct aircraft operations safely and efficiently within AVQ's airspace. Construction of the proposed project will not result in any changes to existing flight patterns or number of flights at the airport. The tower would allow personnel to see, monitor, communicate with, and direct operations of the aircraft accessing the traffic pattern airspace and movement areas for AVQ, and will enhance the safety, efficiency, and service of the existing airport and its facilities. Specifically, this project would include:

- construction of a new air traffic control tower that would be approximately 112 feet tall (123 feet tall including beacon, antennae, and lightning protection system [i.e., lightning rods]) and base building);
- connection of utilities, airfield lighting, and navigational aid control lines to the proposed tower;
- construction of a new vehicle access road and parking area; and
- removal of the existing 50-foot-tall beacon tower and relocating the beacon to the top of the new tower as a 28-inch rotating beacon.

Please submit your comments or concerns within 30 days (by June 3, 2024) to the Town of Marana c/o Theresa Knoblock, SWCA Environmental Consultants, 343 West Franklin Street, Tucson, Arizona 85701 by mail or email directly to theresa.knoblock@swca.com. Thank you for your time and assistance.

Sincerely,

Greg Sendlak

Project Manager Public Works Dept., C.I.P. Division

Town of Marana

5100 W. Ina Rd. Marana, Arizona 85743 (520) 382 2503 Office (520) 437 6600 Mobile gsendlak@maranaaz.gov

cc: Billy Shott, Regional Director, National Park Service

Attachments:

Figure 1. Project location.

Figure 2. Project area of potential effects (3-mile viewshed).

Appendix A. Visual Simulation from the Santa Cruz River Trail



Figure 1. Project location.

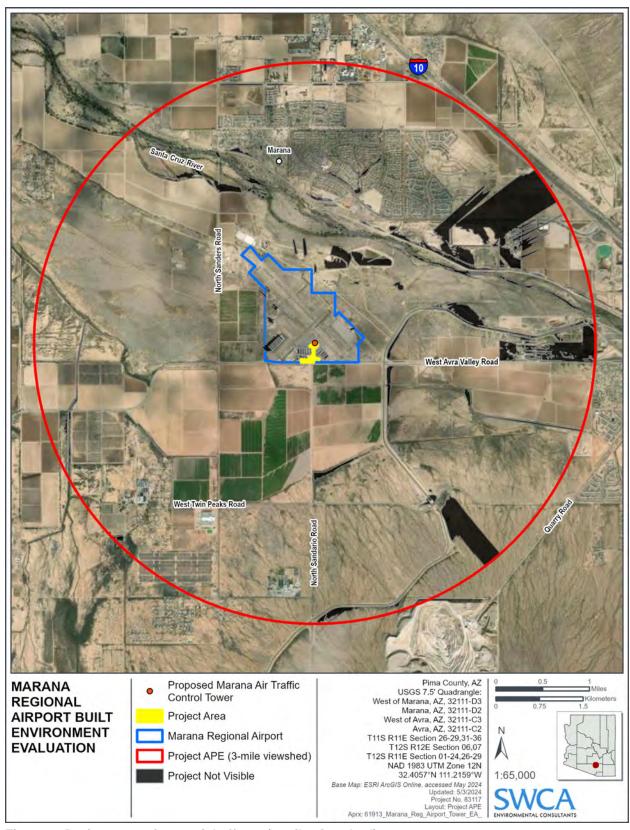


Figure 2. Project area of potential effects (3-mile viewshed).

APPENDIX A

Visual Simulation from the Santa Cruz River Trail

Sun and Weather



Date: 1-13-24

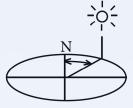
Photo Time:

10:19 am

Visibility:

Air Quality: Good

Sun Azimuth:



132.96°

Sun Angle:

19.4°

Lighting Angle on Project:

Side Lit

Wind:

7 mph

Cloud Cover:

0 %

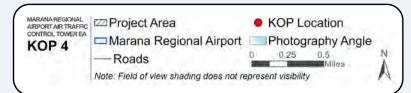
Temperature (°F):

47°F

Simulation was prepared using information provided by client. Locations, colors, and heights may vary based on final engineering and design.

Marana Regional Airport Air Traffic Control Tower





Approximate Distance to Control Tower

1.46 miles

Project Location





KOP 4 - Santa Cruz River Path

Base Photographic Documentation Latitude, Longitude (°):

32.42147, -111.19970

Viewpoint Elevation (feet):2,034

Camera Height (meters): 1.5

Camera Heading (degrees):

220

Camera Make & Model:

Canon EOS 5D Mark IV Camera Sensor Size (mm):

36 x 24 Full Frame

Crop Factor:

N/A

Lens Make & Model:

AF-P Nikkor

Lens Focal Length (mm):

50

Image Size (pixels):

6720 x 4480

Single frame simulation approximates 50mm full frame equivalent.

Viewing Instructions: Printed at 100% the resulting simulation is 16 inches wide by 10 inches high. At this size and focal length, the simulation should be viewed at arms length (24 inches). If viewed on a computer monitor, scale should be 100%.











United States Department of the Interior

Juan Bautista de Anza National Historic Trail 440 Civic Center Plaza, Suite 300 Richmond, CA 94804 www.nps.gov/JUBA

Town of Marana 5100 W. Ina Rd. Marana, Arizona 85743 gsendlak@maranaaz.gov

Re: Comments Regarding Proposed Control Tower at Marana Regional Airport - Impacts to Anza

National Historic Trail

Dear Greg Sendlak and the Town of Marana:

The National Park Service appreciates the opportunity to review the NEPA Scoping Letter for Section 4(f) properties prepared for the proposed air traffic control tower at Marana Regional Airport (ATCT) in the Town of Marana, Arizona. Our comments primarily address potential impacts to, and mitigation for, the Juan Bautista de Anza National Historic Trail (Anza NHT), due to our responsibility to administer, coordinate, preserve and enhance this component of the National Trails System.

The National Park Service (NPS) has a special interest in ensuring the protection of the Juan Bautista de Anza National Historic Trail. Congress, under the National Trails System Act ([NTSA], 16 USC 1241 et. seq.), established the Anza NHT in 1990. The Act states that "National historic trails shall have as their purpose the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment."

The ATCT project site is located 1.46 miles southwest of the mapped historic corridor traveled by the Anza expedition and the present-day Anza recreational retracement trail, as shown in Appendix A. This area is one of the least disturbed landscapes along the entire 1,200 mile length of the Anza NHT. As such, the historic trail corridor near the project site retains the integrity to convey historic interpretation and appreciation of the Anza expedition. NPS has special concerns regarding the ATCT due to the height of the tower's potential to significantly disturb the relatively intact character of the landscape.

Installing the control tower at 123 feet total would significantly alter viewsheds in the surrounding area, including views from the historic Anza historic corridor and the Anza recreational trail. The undertaking thus has the potential to degrade the integrity historic character of the trail and its related resources in this area. The project as currently proposed also has the potential to diminish the public's experience and understanding of the historic expedition and the cultural landscape of that period.

For any clarification of our comments on the NEPA Scoping Letter or for further information relevant to the Anza NHT, please contact Estrella Sainburg, Trail Planner, at Estrella_sainburg@nps.gov.

Sincerely,

NAOMI TORRES Digitally signed by NAOMI TORRES Date: 2024.05.31 14:26:05 -07'00'

Naomi L. Torres Superintendent



Western-Pacific Region Airports Division Phoenix Airports District Office 3800 N. Central Avenue Suite 1025, 10th Floor Phoenix, AZ 85012

August 20, 2024

VIA EMAIL (Naomi_Torres@nps.gov)

Naomi Torres Superintendent National Park Service Juan Bautista de Anza National Historic Trail 440 Civic Center Plaza, Suite 300 Richmond, California 94804

Subject: Proposed Airport Traffic Control Tower at Marana Regional Airport and Potential Impacts to Anza National Historic Trail – Follow-up Consultation

Dear Superintendent Torres:

The Federal Aviation Administration (FAA) and the Town of Marana (Town) provide this additional information that may be beneficial in providing context of the viewshed and setting within and surrounding the portion of Juan Bautista de Anza National Historic Trail (Anza NHT) corridor situated 1.50 miles northeast of the proposed new Airport Traffic Control Tower (ATCT) at Marana Regional Airport (Enclosure 1, Figures 1 and 2). We received your letter dated May 31, 2024, expressing concerns related to the Anza NHT's viewsheds. The FAA continues to consult with your office under the Department of Transportation Act, Section 4f (Section 4 f) process and gather information for our National Environmental Policy Act (NEPA) review.

Field Visit and Further Analysis

On July 24, 2024, representatives of the FAA, Town Public Works–Airport, Town Public Works–Capital Improvements Program, and the Town Parks and Recreation Department, as well as a contracted visual resources professional, visited the Anza NHT corridor where it's proximate to the airport. This visit included taking additional photographs at Key Observation Point (KOP) 4 (Enclosure 1, Figure 3). For reference, a copy of the previously provided visual simulation prepared at this KOP is attached as Enclosure 2. The purpose of the site visit was to gather additional contextual information and understanding related to the viewshed and your office's concerns.

The closest recreation facility to the proposed ATCT is Santa Cruz River Park, which contains a portion of the Santa Cruz River Trail (SCRT), also known as "Chuck Huckleberry Loop" or "The Loop," a 137-mile regional system of paved pathways and bike lanes. The SCRT portion nearest the proposed ATCT approximately coincides with a section of the designated corridor of the Anza NHT (see Enclosure 1, Figure 3).

The viewshed associated with KOP 4 is characterized by both natural and human-made features. The SCRT itself is a human-made, paved pathway located on top of a soil-cement treated earthen embankment bounded with various types of fencing (post and chain, metal-pipe handrails, and chain-link). The height of the embankment varies from three feet to more than 10 feet tall. Vegetation along the trail is dominated by large stature native riparian trees and shrubs such as velvet mesquite (*Prosopis velutina*) and creosote bush (*Larrea tridentata*) as well as invasive tree species, such as tamarisk (*Tamarix ramossissima*). This vegetation screens and obscures views across the river corridor from the SCRT. Urban and industrial development along the trail to the east, which was not depicted in the previously provided visual simulation, is prominent, and when in proximity of the trail, becomes the focus of attention. Viewpoint photographs 1 through 5 depict additional contextual images from the trail (Enclosure 3).

Current land use adjacent to the SCRT in the vicinity and of the airport includes Agricultural, Industrial, Parks/Open Space, Public/Institutional, and Single Family Residential. Zoning in adjacent areas outside the floodplain includes Agriculture, Small, Medium and Large Lot zones, Single Family Residential, and Village Commercial. The SCRT corridor itself would not be developed, as it is in a floodplain and the trail itself is located within designated Parks/Open Space. However, projected future land use outside the floodplain would be primarily Industrial and a mix of residential uses (see Enclosure 1, Figure 4). The Town's Industrial designation provides for a mix of light and heavy industrial uses, employment centers, offices, research and development facilities, and mining infrastructure, such as the facilities visible in the viewpoint photographs (see Enclosure 3).

The FAA and Town acknowledge that the proposed 123-foot-tall ATCT would be visible during the day in the distance from the SCRT; however, views would be intermittent and broken by the prominent vegetation. The proposed ATCT is not anticipated to be the focus of attention of the SCRT users in the area. The existing built features, which includes the developed SCRT as well as industrial development associated with aggregate mining (see Enclosure 3, Viewpoints 1–5), would be the prominent built features as compared to the proposed ATCT, which would be viewed approximately 1.5 miles from the trail (see KOP 4 simulations, Enclosure 2).

The Town's public parks are closed at night; however, the SCRT is open for night-time use. The airport's existing beacon light, proposed to be relocated from atop a 50-foot-tall tower to the top of the proposed 123-foot-tall ATCT, would be visible from those intermittent sections of trail that have a line of sight to the proposed ATCT.³ While the brightness and steady horizontal rotation of the beacon light would be visible by night-time users of the SCRT, the beacon would be observed from a distance, frequently screened by vegetation, and observable in combination with lights from industrial, residential, and commercial developments situated directly adjacent to the

¹ Town of Marana. 2019. *Make Marana 2040 General Plan*. Marana, Arizona. Available at: https://www.maranaaz.gov/make-marana-2040. Accessed July 2024.

² According to the 2040 General Plan, the 2010 Future Land Use Map (Attachment C) "guides the built environment by illustrating the type and location of permitted land uses. The land use types are described through the Future Land Use Categories. The 2010 FLUM represents the collective vision of Town leaders and residents and will continue to guide development decisions until the Make Marana 2040 General Plan is ratified." The 2040 General Plan was ratified on August 4, 2024.

³ SWCA Environmental Consultants. 2024. *Visual Character Analysis for the Marana Regional Airport Air Traffic Control Tower Project*. Tucson, Arizona: SWCA Environmental Consultants.

trail. For these reasons, the recreational experience of night-time users of the SCRT is not anticipated to be impaired by the proposed ATCT or the proposed beacon location.

Potential Treatment Options

The Town investigated potential options to further reduce the discernibility of the proposed ATCT when viewed from the SCRT. Options initially considered were possible color treatments of the proposed ATCT's exterior to reduce its discernability from a distance, and increasing screening by planting vegetation near the trail where there may be unobstructed views of the proposed ATCT. These options were not considered further after more detailed analysis, as color treatments on the proposed ATCT's exterior would not be visually discernable considering its low profile and distance from the trail, and vegetation's survival is doubtful since the Santa Cruz River typically floods from bank to bank every few years.

A more creative option discussed by the project team and considered is the development and installation of an interpretive sign panel along the SCRT in collaboration with your office to provide trail users with information associated with the Anza NHT as well as the historical evolution of the landscape over time, to present day. The strategic placement of the sign could possibly reduce the discernibility of the proposed ATCT where there are gaps in the existing vegetation. During the site visit, the participants observed an existing bench and shade structure located next to the trail that could be a suitable place for an interpretative sign.

Looking Ahead

The FAA seeks clarification from your office about whether the proposed ATCT would substantially impair the Anza NHT and SCRT under Section 4f. We seek any additional input from your office on viewshed impacts and any treatment measures under NEPA. The FAA's consultation to date with the Town's Parks and Recreation Department suggests that the proposed ATCT would not substantially impair the trail's enjoyment by its users. FAA and Town representatives are available to discuss these topics with you or your staff either virtually or onsite. If you have any questions, please contact me at (602) 792-1066 or matthew.h.bilsbarrow@faa.gov.

Sincerely,

MATTHEW H Digitally signed by MATTHEW H BILSBARROW Date: 2024.08.20 16:47:44

Matthew Bilsbarrow, RPA Environmental Planner

Enclosures

cc: Estrella Sainburg, estrella_sainburg@nps.gov
Dave Herman, Marana Parks and Recreation, dherman@maranaaz.gov
Greg Sendlak, Town of Marana, gsendlak@maranaaz.gov
Theresa Knoblock, SWCA, theresa.knoblock@swca.com
Tony Bianchi, FAA, anthony.r.bianchi@faa.gov
Messar Mustafa, FAA, messar.a.mustafa@faa.gov

ENCLOSURE 1

Figures



Figure 1. Project location.

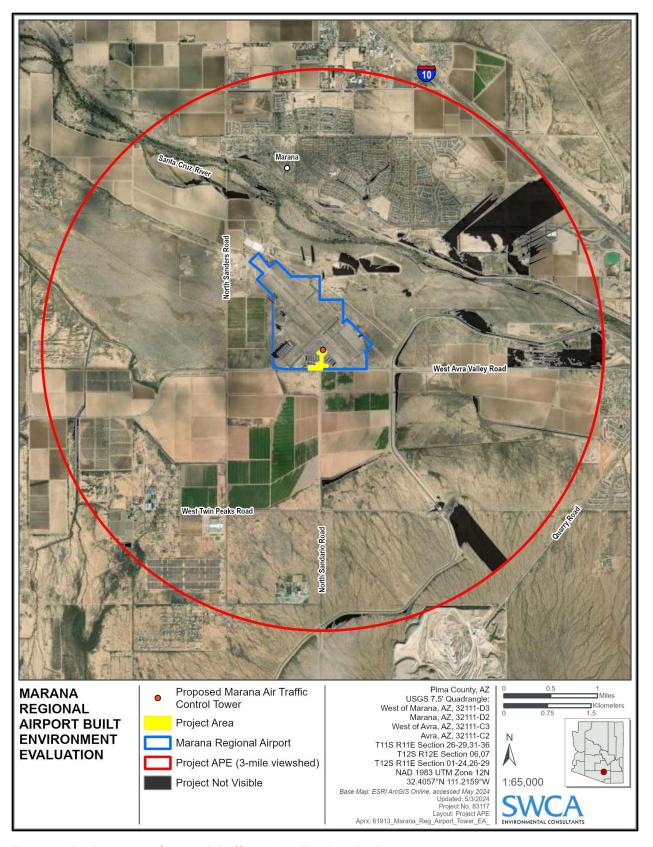


Figure 2. Project area of potential effects (3-mile viewshed).

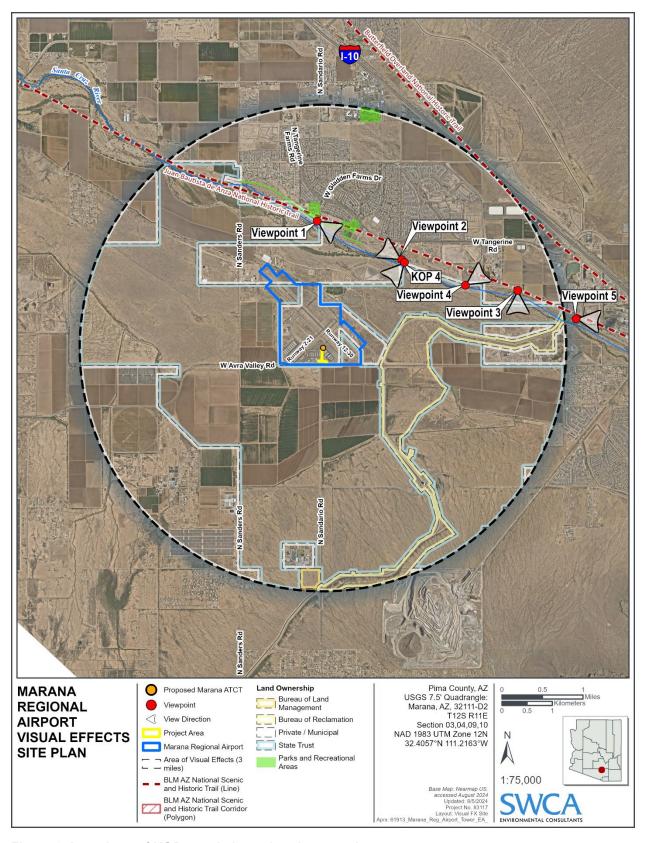


Figure 3. Locations of KOP 4 and viewpoint photographs.

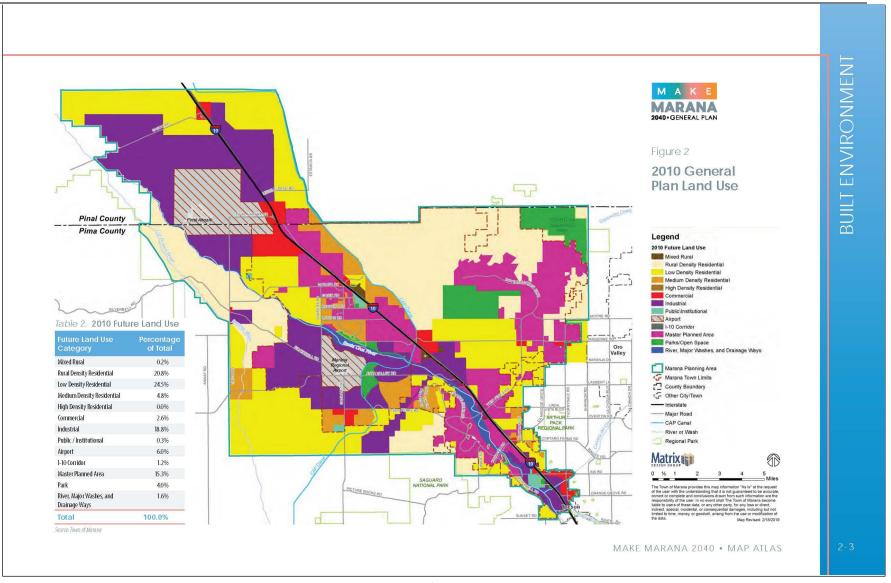


Figure 4. 2010 General Plan land use map, showing future land use.4

4 T

⁴ Town of Marana. 2019. *Make Marana 2040 General Plan, Map Atlas*. Marana, Arizona. Available at: https://www.maranaaz.gov/make-marana-2040. Accessed July 2024.

ENCLOSURE 2

Visual Simulation from the Santa Cruz River Trail (previously provided in May 3, 2024 letter from Town of Marana)

ENCLOSURE 3 Representative Viewpoint Photographs



Viewpoint 1. Santa Cruz River Trail; view facing south.



Viewpoint 2. Santa Cruz River Trail; view facing north from simulated location.



Viewpoint 3. Industrial development in the distance (approximately 0.9 mile east) across the Santa Cruz River.



Viewpoint 4. Industrial facilities and development near Santa Cruz River Trail.



Viewpoint 5. Industrial facility adjacent to Santa Cruz River Trail.





United States Department of the Interior

Juan Bautista de Anza National Historic Trail 440 Civic Center Plaza, Suite 300 Richmond, CA 94804 www.nps.gov/JUBA

September 13, 2024

Town of Marana 5100 W. Ina Rd. Marana, Arizona 85743 gsendlak@maranaaz.gov

Re: Marana Regional Airport - Proposed ATCT - Anza National Historic Trail - follow up

consultation

Dear Greg Sendlak and the Town of Marana,

Thank you for your letter dated August 20, 2024. We appreciate your visit and study of the Santa Cruz River Trail (SCRT) location closest to the proposed Airport Traffic Control Tower and the inclusion of the key observation points. The viewshed from the Anza Trail/SCRT is one of few remaining landscapes that continue to be in a condition similar to what the Anza Expedition observed.

We had the opportunity to visit the site and obtain input from local Anza Trail partners. We are supportive of the installation of a wayside as it could address the public experience and understanding of the landscape and the Anza Expedition. In the development of the wayside, we would seek to involve these partners and local stakeholders.

Sincerely,

Naomi L. Torres Superintendent

cc: Dave Herman, Marana Parks and Recreation, dherman@maranaaz.gov Theresa Knoblock, SWCA, theresa.knoblock@swca Tony Bianchi, FAA, anthony.r.bianchi@faa.gov

Messar Mustafa, FAA, messar.a.mustafa@faa.gov

 $Matthew\ Bilsbarrow,\ FAA,\ matthew.h.bilsbarrow@faa.gov$

Taylor Neal, FAA, taylor.n.neal@faa.gov

Marana Airport Sign Specs for Anza Trail Juan Bautista de Anza National Historic Trail Estrella Sainburg and Christopher Bentley 10/24/24

Sign size and design:

The cantilevered, low-profile style base from Pannier is the NPS standard and would be the same as the one that exists at El Rio (Puerto de Azotado). Specs are correct. Including here for reference:

Aluminum Low Profile Exhibit Bases for final trim sized 36"w x 24"h panels. Visual area will be 35.125"w x 23.125"h. Includes (2) 2" x 3" x 62" posts. Direct embed. Powder coated NPS Medium Gray with a textured finish. Maximum panel thickness - 1/4".

Preliminary Information Only-

- Live visual exhibit panel dimensions = 24" x 36" with \(\frac{3}{4}\)" wide reveal surrounding frame margin (1 \(\frac{3}{4}\)" depth)
- Cantilever low profile 2-post style, 2" x 4" hollow aluminum or steel frame set in concrete footing (depth unknown) beneath a concrete slab (walkway)
- Front clearance height to bottom of frame = 30 ½"
- Rear clearance height to bottom of frame = 42"

See attached for detailed specs.

The timeline for developing the sign:
Engagement and team assembly – 1 month
Design and review – 3 months
Manufacture and delivery – 1 month
Total: 5 months

The specific location we seek for the sign to be place (whether on the bench side or airport side and exactly where): Figure 1, attached

The NPS color palette: We do not mandate a color palate. If using our trail logo, then yellow, orange, red, black is an option.

Who will be engaged in the development process of the sign:

National Park Service Anza Trail Foundation Town of Marana Pascua Yaqui/Yoeme

Attachments:

- Pannier manufacturer Exhibit base
- Sign Base Design
- Figure 1. Proposed Sign Location
- Simulation of sign at proposed location

Pannier Exhibit Base

Assembly and Installation **Instructions**

For use with the following exhibit bases:





Installing a Pannier exhibit base is as easy as 1, 2, 3.

Step 1 - Inspect and Organize

As soon as your shipment arrives inspect all pieces and assembly components to make sure your delivery is complete.

For each exhibit base, the following will be included: (Figure 1)

- A. Frame Legs
- Removable Top Extrusion
- Exhibit Panel (Use Pannier Fiberglass C. Embedded panels for best results)
- D. 1/4" Aluminum Drive Rivets or 1/4"-20 Phillips Flat Head Screws
- 3/8" Aluminum Drive Rivets
- F. Frame Assembly

Assembling and installing a Pannier exhibit base is a straightforward process made even easier if two or more people work together using the proper tools and materials to complete the task.

- **Recommended tools and materials:** Power or manual post-hole digger
 - Shovel
 - Wood braces
 - Hammer
 - Clamps Nails
 - Plastic sheeting
 - Cement
 - Gravel
 - Tamping bar
 - Level

Step 2 - Assembly

(D) 1/4" Drive Rivets/

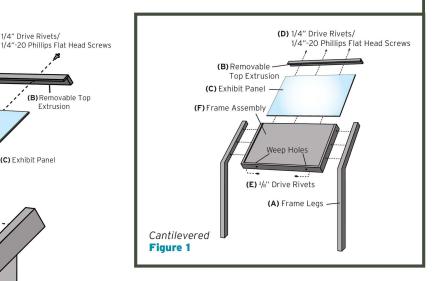
If you purchased your exhibit panels and bases from Pannier, most of the assembly has already been completed for you.

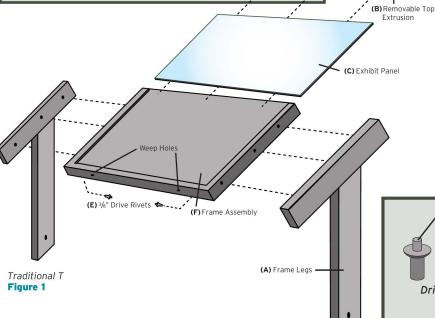
Attach the Frame Legs to the Frame Assembly with the supplied 3/8" Drive Rivets, as shown in Figure 1. Proceed to Step 3 -Installation.

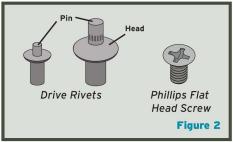
If you purchased the exhibit bases only, you will need to install your exhibit panel and attach the Frame Legs.

To install the Exhibit Panel, first place the Frame Assembly face-up on a raised sturdy work surface. Remove the Removable Top Extrusion. Slide the Exhibit Panel face-up into the Frame Assembly channel. Make sure the bottom of the panel meets the bottom of the Frame Assembly, as indicated by weep holes. Attach the Removable Top Extrusion with supplied 1/4" Drive Rivets to securely enclose the Exhibit Panel. Insert the rivet, and drive the pin (see Figure 2) down with a hammer until flush with the head. If your exhibit base came with screws, attach the Removable Top Extrusion with supplied 1/4"-20 screws to securely enclose the Exhibit Panel. Insert screws and tighten into holes (see Figure 2) with a Phillips Head Screwdriver until secure.

Attach the completed Frame Assembly to the Frame Legs with the supplied 3/8" Drive Rivets. Proceed to Step 3 - Installation.









Pannier Exhibit Base Assembly and Installation Instructions

Step 3 - Installation

Move all assembled exhibit bases, tools and materials to the installation site. Mark the installation location using stakes or approved marking paint to indicate Frame Leg locations. Prior to installation, please check the local building and signage codes as well as the applicable ADA (Americans with Disabilities Act) regulations for compliance.

Installing to a permanent surface:

When installing the exhibit base with attached base plates to a permanent surface, such as concrete, use the appropriate fastening devices to provide a secure and permanent installation.

Installing in the ground:

When installing the exhibit base in the ground, you will need to dig holes approximately 6" below the local frost line. We recommend that you plan your installation depth to allow for approximately 28" to 32" distance between the ground surface and the bottom of the Frame Assembly when finished.

Preparing the holes

Fill the completed holes with approximately 6" of gravel and tamp to provide an even and firm surface.

Protecting the exhibit base

To prevent concrete splatter from attaching to the Frame Legs, wrap and secure plastic to the upper portion of the Frame Legs to protect any part which will be seen after installation.

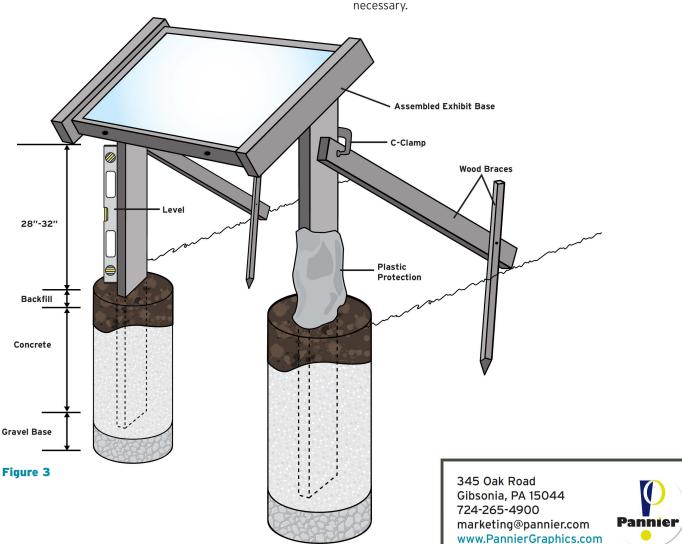
Setting the exhibit base

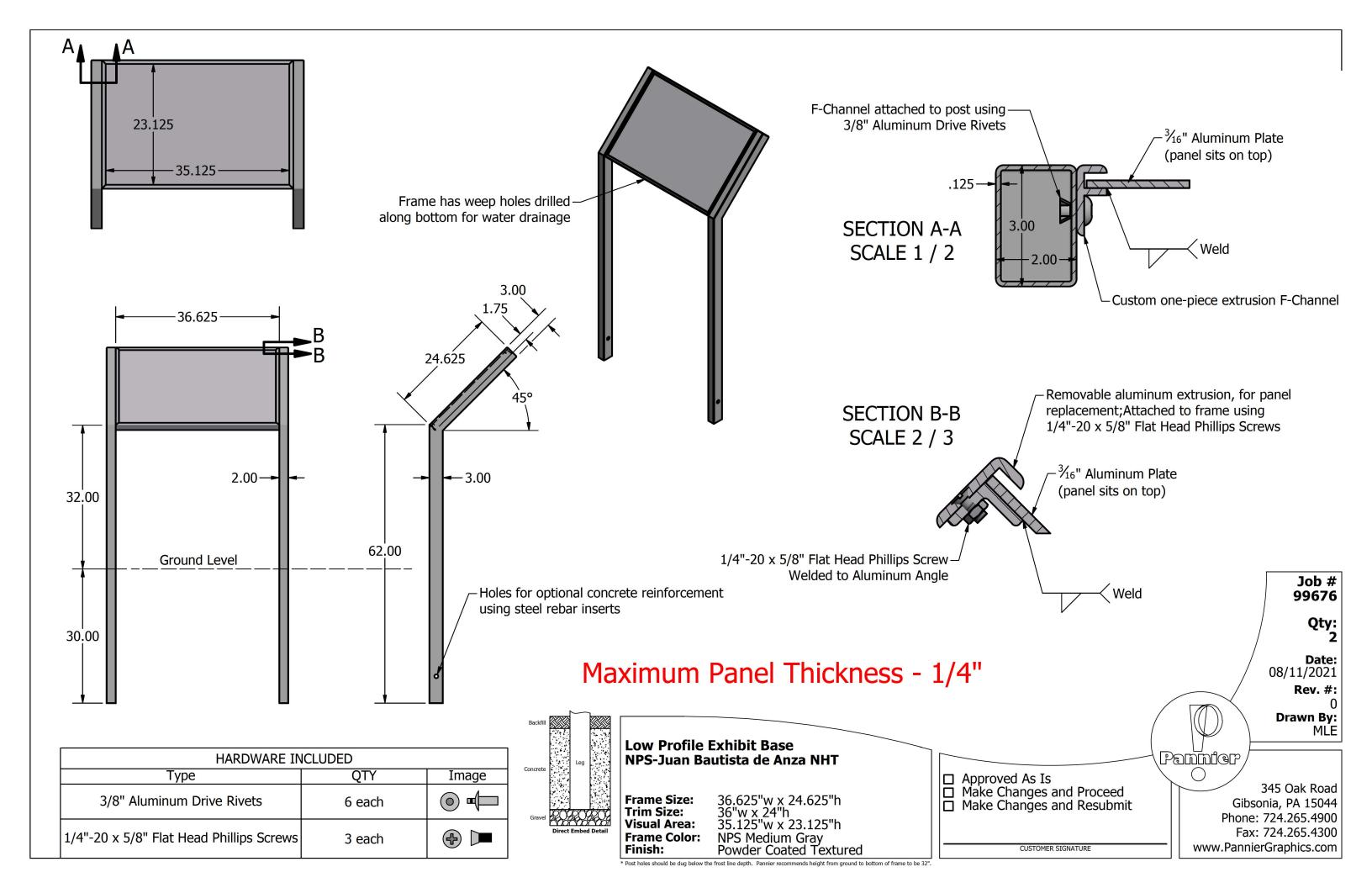
Set the exhibit base in the ground, level the uprights by securing with temporary braces and clamps as shown in Figure 3. Double-check the distance from the ground surface to the exhibit frame for proper height.

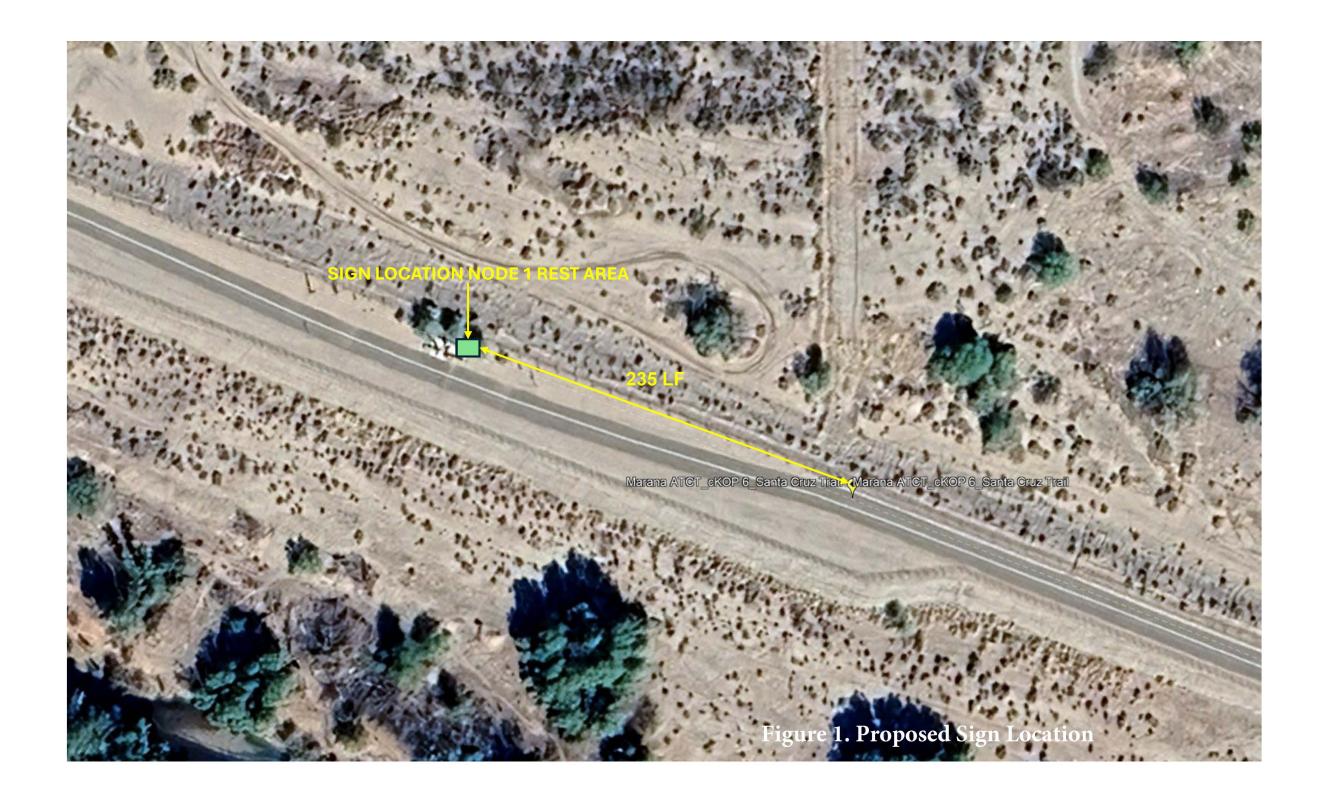
Mix and fill the holes with wet cement to within 2" of the ground surface. Agitate the concrete to remove air pockets making sure to not bump or move the braced exhibit base. Carefully recheck the base level before the concrete begins to harden.

Finishing the installation

Let cement set for at least 24 hours, remove the plastic and braces, back fill remaining holes and finish as necessary.



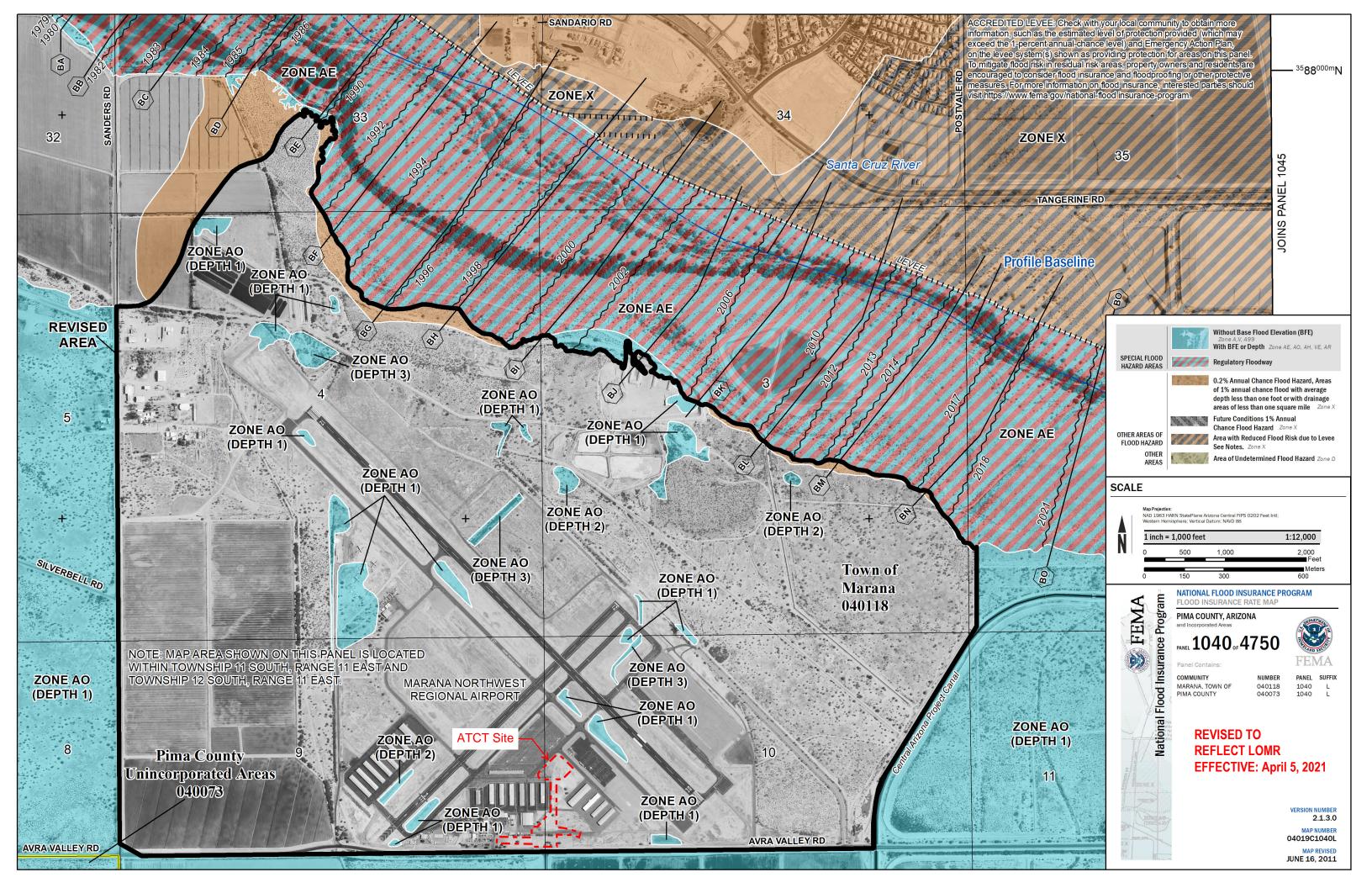






APPENDIX G

Waters of the U.S (Floodplains)



APPENDIX H

Public Involvement

PUBLIC INVOLVEMENT

This section includes a summary of public involvement, and a summary of issues raised at any public hearing or public meeting. The intent of public involvement is to inform the public and solicit comments. FAA requirements for public involvement while completing an EA are discussed in FAA Order 1050.1F. Paragraph 6-2.2(b) of the Order states that the FAA or sponsor must involve the public, to the extent practicable, in preparing EAs.

Scoping

Under FAA Order 1050.1F, public involvement is determined on a case-by-case basis, and scoping (a method for soliciting comments) is optional. FAA determined scoping would be appropriate for this EA.

On May 23, 2024, the following agencies/entities (Table H-1) were provided with a scoping packet containing information on this Environmental Assessment (EA) and soliciting input regarding the Proposed Action. All recipients were sent a full scoping package, which included an overview letter, an agency comment form, and three figures. This appendix provides an example scoping letter. The scoping period lasted for 30 days. All responses received are included herein.

Table H-1. Scoping Recipients.

Agency/Entity	Response Received
Arizona Department of Transportation	May 28, 2024
Ak-Chin Indian Community	-
Arizona Department of Environmental Quality	-
Arizona Game and Fish Department	July 1, 2024
Arizona State Land Department	-
Bureau of Land Management	May 24, 2024
Bureau of Reclamation	-
Central Arizona Project Management Council	-
Central Arizona Water Conservation District / Central Arizona Project	June 24, 2024
Cortaro-Marana Irrigation District (CMID)	-
Environmental Protection Agency	-
FAA Federal Contract Tower	-
Gila River Indian Community	-
Hopi Tribe	-
Marana Unified School District	-
Marana Wastewater	-
Marana Water	-
Mescalero Apache Tribe	-
Northwest Fire District	June 6, 2024
Pascua Yaqui Tribe	May 23, 2024; January 30, 2025
Pima County Natural Resources, Parks & Recreation (The Loop)	-
Pima County Regional Flood Control District	-
Pueblo of Zuni	-
Salt River Pima-Maricopa Indian Community	June 10, 2024
Tohono O'odham Nation	-
Tonto Apache Tribe	-
Town of Marana	-
Marana Police Department	June 17, 2024
Town of Marana Chamber of Commerce	-
Town of Marana, Department of Emergency Management	-
Yavapai-Apache Nation	-
White Mountain Apache Tribe	June 4, 2204

TOWN OF MARANA PUBLIC OUTREACH SUMMARY

The Town of Marana has been presenting the Proposed Action to the public since 2022 through outreach efforts, which have included community events, podcast episodes, town newsletters, town holiday events and festivals, community meetings, and town website publications (Table H-2).

The Town of Marana has also been discussing the proposed ATCT at Town Council sessions and meetings open to the public. This list is provided below in Table H-3.

TABLE H-2. AVQ PROPOSED AIR TRAFFIC CONTROL TOWER - PUBLIC OUTREACH LOG

Data	Event	Location	Description
<u>Date</u>		Location	<u>Description</u>
2022-10-13	Marana Insights	NW Fire Admin Building	Presentation by Fausto Burruel about Town airport projects that included the proposed Air Traffic Control Tower
2022-10-20	Marana Trick or Treat Trail	MMC Courtyard	Airport staff had a booth, gave out candy and talked with residents about the airport and proposed Air Traffic Control Tower
2022-12-07	Dove Mountain Community Meeting	MPD Community Room	Galen Beem presentation about the Town airport, speaking with residents about the proposed Air Traffic Control Tower
2023-01-09	Impact Marana	JD Russell Hangar	Presentation by Galen Beem: Past, Present & Future of the Marana Regional Airport including the proposed Air Traffic Control Tower & a Tour
2023-03-18	Marana Founders' Day Event	MMC Courtyard	Airport staff had booth and partnered with IFLY Flight School. Spoke with residents about the airport and proposed Air Traffic Control Tower
2023-05-30	Real Talk Internet Podcast	Town Manager's Office	Galen Beem was interviewed by Town Manager Terry Rozema about Marana airport projects including the proposed Air Traffic Control Tower
2023-07-04	Marana Star Spangled Spectacular Event	Crossroads District Park	Airport staff had a booth and spoke with residents about the airport including the proposed Air Traffic Control Tower
2023-10-19	Marana Trick or Treat Trail	MMC Courtyard	Airport staff had a booth, gave out candy, and spoke with residents about the airport and proposed Air Traffic Control Tower
2023-10-26	Marana Fall Festival Event	Heritage River Park	Airport staff had a booth, gave out information, and spoke with residents about the airport and proposed Air Traffic Control Tower
2024-03-16	Marana Founders' Day Event	MMC Courtyard	Airport staff participated in the parade, had a booth, and talked with residents about the airport and the proposed Air Traffic Control Tower
2024-04-20	Movie in the Park Sponsored by Marana Regional Airport	Ora Mae Harn Park	Airport staff had a booth, conducted games with children, and spoke with residents about the airport including the proposed Air Traffic Control Tower
2024-05-29	TOM Public Works CIP Division Project Portal Launch	Town Website	Airport project(s) information posted (including status of the proposed Air Traffic Control Tower) available to the public via the Town's internet website
2024-05-30	Tucson Media Article from Fausto Burruel	Tucson Newsletter	Fausto Burruel and Galen Beem wrote an article for the local newspaper about airport projects including the proposed Air Traffic Control Tower
2024-10-12	Marana Fall Festival Event	Heritage River Park	Airport staff had a booth, gave out information, and spoke with residents about the airport and proposed Air Traffic Control Tower
2024-10-17	Marana Trick or Treat Trail	MMC Courtyard	Airport staff had a booth, gave out candy, and spoke with residents about the airport and proposed Air Traffic Control Tower
2024-11-13	Marana Senior Citizens Airport Tour	On Site at Airport	25 Marana Senior Citizens toured the airport with Town Parks & Recreation staff. Discussion regarding the proposed Air Traffic Control Tower
2024-11-22	KGUN 9 News Local Broadcast- Control Tower Story	Local TV and Website	KGUN 9 (ABC) local news broadcast a story 11/22/24 through 11/25/24 about the timeline for the proposed Marana Regional Airport Traffic Control Tower including interview with Marana project manager Greg Sendlak
2024-12-12	Impact Marana, Class Two - Presentations at AVQ	Marana Regional Airport	Galen Beem gave a presentation about the airport including the proposed ATCT to program participants sponsored by the Marana Chamber of Commerce
2025-02-20	KVOA, KOLD, & KGUN Local News Stations Broadcast - Control Tower Schedule Stories	Local TV and Website	With a fatal crash occurring at AVQ the prior day, KVOA (NBC), KOLD (CBS) & KGUN (ABC) local news stations broadcast stories on 2/20/25 and 2/21/25 about the schedule for acquiring an Airport Traffic Control Tower at AVQ including interviews with Marana project manager Greg Sendlak

TABLE H-3. AVQ PROPOSED AIR TRAFFIC CONTROL TOWER - DISCUSSIONS DURING TOWN COUNCIL PUBLIC MEETINGS

<u>Date</u>	Session	<u>Item</u>	<u>Description</u>
2020-06-23 2020-12-11	Special Council Meeting Regular Council Meeting	Town Manager's Message (Jamsheed Mehta) Consent Item G	Airport was accepted into the FAA's Federal Contract Tower Program and grant funding being pursued for construction of a tower Support legislation that focuses on maintaining current or allocating additional funding for airport-related development efforts, including but not limited to Economic Development, capital improvements and maintenance, and funding of an air traffic control tower
2021-01-12	Study Session	Strategic Plan Budget Briefing	Upcoming initiatives - Federal Control Tower funding presentation
2021-02-23 2021-04-27	Study Session Study Session	Capital Improvement Program Presentation Town Manager's Tentative Budget Message	Town Engineer Keith Brann gave a Power Point Presentaton on the Capital Improvement Program including the proposed Air Traffic Control Tower
2021-05-18	Regular Council Meeting	Town Manager's Report: Summary of Current Events	Town Manager Terry Rozema highlighted accomplishments including applying for the Air Traffic Control Tower Siting Study grant and securing an engineering consultant to complete the Siting Study Town Manager Terry Rozema mentioned that he and town staff including Deputy Town Manager Eric Montague, and Assistant to the Town Manager, Heath Vescovi-Chiordi took a trip to Mesa Gateway Airport as they are in the process of building an air traffic control tower. The Town will be pursuing that in the near future.
2021-05-18	Regular Council Meeting	Town Manager's Tentative Budget Message	Town Manager Terry Rozema reported that with the Marana Regional Airport recently accepted into the Federal Contract Tower Program we are in process of an environmental study for the entire airport as well as beginning the process for the Siting, Design and Construction of the new Air Traffic Control Tower
2022-03-10	Special Council Meeting	Minutes Summary	Economic Development Direct Curt Woody gave a Power Point Presentation regarding Airport Commercial Projects, CIP Projects, and the Air Traffic Control Tower Study
2022-03-22	Study Session	Capital Improvement Program Presentation	Public Works Director Mohammed El-Ali gave a power point presentation which including discussion about the proposed Air Traffic Control Tower project
2022-04-26	Study Session	Summary of Airport Funds	Finance Director Yiannis Kalaitzidis gave a power point presentation about Airport Funds - including the proposed Air Traffic Control Tower project
2022-05-17	Regular Council Meeting	Town Manager's Tentative Budget Message	Town Manager Terry Rozema gave a Power Point Presentation including Marana Regional Airport and specifically the current proposed Air Traffic Control Tower project schedule
2022-06-21 2022-08-03	Special Council Meeting Regular Council Meeting	Fiscal Year Capital Improvement Program Change Order Approval For Airport Projects	Finance Director Yiannis Kalaitzidis gave a power point presentation regarding the Five Year Capital Improvement Program including the proposed airport Air Traffic Control Tower Air Traffic Control Tower Siting Study is completed. Dibble will develop construction drawings for work associated with re-routing the existing duct bank around the footprint for the proposed Air Traffic Control Tower
2023-02-07	Regular Council Meeting	Budget Update	Finance Director Yiannis Kalaitzidis gave a power point presentation regarding the Airport Fund expenses increased 9.5 percent. Increases were primarily related to the Air Traffic Control Tower Siting Study and various runway light replacements
2023-03-13	Special Council Meeting	Retreat Summary Minutes	Mayor, Council, Town Manager, and Public Works Director lengthy discussion about the proposed Air Traffic Control Tower project schedule, possibility of losing federal funding if FCT Program schedule isn't met, and the need to push the project forward with expressed support from the Town Council.
2023-04-18	Regular Council Meeting	Meeting Minutes Summary	Council Member Ziegler asked who would maiantain the airport control tower once constructed. Public Works Director Fausto Burruel and Finance Director Yiannis Kalaitzidis explained that the control tower would be operated by FAA personnel, but maintained by Town staff
2023-06-20	Regular Council Meeting	Capital Improvement Program Presentation	Finance Director Yiannis Kalaitzidis gave a power point presentation about Airport Capital Improvement Program funds including the proposed Air Traffic Control Tower
2023-11-21	Regular Council Meeting	C6 Resolution No. 2023-112	Relating to Marana Regional Airport; council authorized the Public Works Director to submit an application for entry into the Federal Contract Tower Program to start a new 5-year term for completion of the Air Traffic Control Tower
2023-12-19	Regular Council Meeting	C4 Resolution No. 2023-125	Council approval and authorization for the Town Manager to execute an Airport Development Reimbursable Grant Agreement with the State of AZ for the purpose of providing financial assistance for the airport Air Traffic Control Tower Environmental Assessment project.
2024-02-16	Council Retreat	Ongoing Action Items	Town Manager Terry Rozema gave a power point presentation of ongoing action items including the Marana Regional Airport reapplication to the Federal Contract Tower Program
2024-04-16	Regular Council Meeting	Manager's Report: Summary of Current Events	Town Manager Terry Rozema reported that Marana Regional Airport received formal notification from the FAA that it has been accepted into the Federal Contract Tower Program for a new 5-year window in which to complete the Air Traffic Control Tower
2024-04-22	Special Council Meeting	Town Manager's Recommended Budget	Finance Director Yiannis Kalaitzidis gave a power point presentation on the Town Manager's recommended budget including capital outlay needed for funding of the multi-year airport Air Traffic Control Tower project
2024-06-18	Special Council Meeting	Capital Improvement Plan	Finance Director Yiannis Kalaitzidis gave a power point presentation on the 5-year Capital Improvement Plan including costs associated with the proposed airport Air Traffic Control Tower
2024-09-03	Regular Council Meeting	Marana Transportation Master Plan	Public Works Director Fausto Burruel gave a power point presentation on the Marana Transportation Master Plan including the Marana Regional Airport Master Plan with top priority being construction of the new proposed Air Traffic Control Tower
2024-11-19	Regular Council Meeting	Airport Control Tower EA Project Change Order	Finance Director Yiannis Kalaitzidis requested additional funds (AIP grant reimbursable) for work added by the FAA beyond the original scope for the Airport Control Tower EA project

From: <u>Theresa Knoblock</u>

To: townmanager@maranaAZ.gov

Subject: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

Date: Thursday, May 23, 2024 4:32:00 PM

Attachments: image001.png

Terry Rozema Marana Regional Airport 05232024.pdf

This letter serves as our agency's invitation to review a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona and provide input on any concerns, suggestions or recommendations pertaining to this project. This letter is also your invitation to continue to receive information about the project during the NEPA evaluation. If your agency has a continuing interest in this project, please indicate that you would like to be included as a cooperating agency or participating agency.

Please submit your comments or concerns within 30 days (by June 24, 2024) to the Town of Marana c/o Theresa Knoblock, SWCA Environmental Consultants, 343 West Franklin Street, Tucson, Arizona 85701 by mail or email directly to theresa.knoblock@swca.com. Thank you for your time and assistance.

Thank you,
Theresa Knoblock
Senior Lead - Tucson

SWCA Environmental Consultants

343 W Franklin Street
Tucson, Arizona 85701
P 520.325.9194 | D 520.402.4127
theresa.knoblock@swca.com



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May 24, 2024

Pima County Natural Resources Parks & Recreation (The Loop) 3500 W. River Rd Tucson, AZ 85741

Sent via email:

Re: Scoping for a Proposed Control Tower at Marana Regional Airport

Dear Sir or Madam,

The Town of Marana is designing a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona (Figures 1 and 2). Funding and authorization of the project will require approval through the Federal Aviation Administration (FAA) and an amendment to the approved airport layout plan. Because the proposed project requires review and approval from the FAA (a federal agency), review under the National Environmental Policy Act (NEPA) is required.

This letter serves as our agency's invitation to review this proposed project based upon the scope of work and project location and provide input on any concerns, suggestions or recommendations pertaining to this project. This letter is also your invitation to continue to receive information about the project during the NEPA evaluation. If your agency has a continuing interest in this project, please indicate that you would like to be included as a cooperating agency or participating agency.

Please provide feedback using the attached form. Information that would be helpful to the NEPA review includes: 1) input on which issues may be significant or insignificant based on your agency's experience and expertise; 2) information about relevant data sources related to these issues of concern, if applicable; 3) information on past and future projects that have occurred within the 3-mile study area (Figure 3) within the last 5 years or anticipated within the next 5 years; 4) any planning activities within your agency jurisdiction that may be affected such as general plans or capital improvement projects.

The proposed project would include construction of a new air traffic control tower at AVQ to manage and direct aircraft operations safely and efficiently within AVQ's airspace. Construction of the proposed project will not result in any changes to existing flight patterns or number of flights at the airport. The tower would allow personnel to see, monitor, communicate with, and direct operations of the aircraft accessing the traffic pattern airspace and movement areas for AVQ, while enhancing the safety, efficiency, and service of the existing airport and its facilities.

Specifically, this project would include:

- construction of a new air traffic control tower that would be approximately 112 feet tall (123 feet tall including rotating beacon, antennae, and lightning protection system [i.e., lightning rods]) and base building);
- connection of utilities, airfield lighting, and navigational aid control lines to the proposed tower;
- construction of a new vehicle access road and parking area; and

• removal of the existing 50-foot-tall beacon tower and relocating the rotating beacon to the top of the new tower as a 28-inch rotating beacon.

Please submit your comments or concerns within 30 days (by June 24, 2024) to the Town of Marana c/o Theresa Knoblock, SWCA Environmental Consultants, 343 West Franklin Street, Tucson, Arizona 85701 by mail or email directly to theresa.knoblock@swca.com. Thank you for your time and assistance.

Sincerely,

Greg Sendlak

Project Manager Public Works Dept., C.I.P. Division

Town of Marana

5100 W. Ina Rd. Marana, Arizona 85743 (520) 382 2503 Office (520) 437 6600 Mobile gsendlak@maranaaz.gov

Enclosures: Figure 1- Project Area

Figure 2 – Project Location Figure 3 – Study Area

Agency Input Form

Date:
Name and Title:
Organization
Contact information (email, address)
Phone:
Preferred method of communication: □ email □ hard copy letter
Does your agency have any jurisdiction by law (such as land jurisdiction, permitting authority) or special expertise in the Study Area?: \Box YES \Box NO
If yes, would you like to be considered a □Cooperating Agency or □ Participating Agency?
Would you like to continue to receive project information? $\Box \ \ YES \ \ \Box \ \ NO$
If so, what is your preferred method of receiving information: \Box email \Box hard copy
Does your agency have any input on which issues may be significant or insignificant based on your agency's experience and expertise? Please describe your concerns:
Does your agency have any information regarding relevant data sources related to these issues of concern identified above? Please feel free to email documents or links to theresa.knoblock@swca.com
Please provide any information you have available regarding past and future projects under your jurisdiction that have occurred within the Study Area within the last 5 years or that are anticipated within the next 5 years. This information will be considered in the cumulative impact analysis in our NEPA review.
Please identify any planning activities within your agency jurisdiction that may be affected by project implementation such as general plans or capital improvement projects in the Study Area.



Figure 1. Project Area.

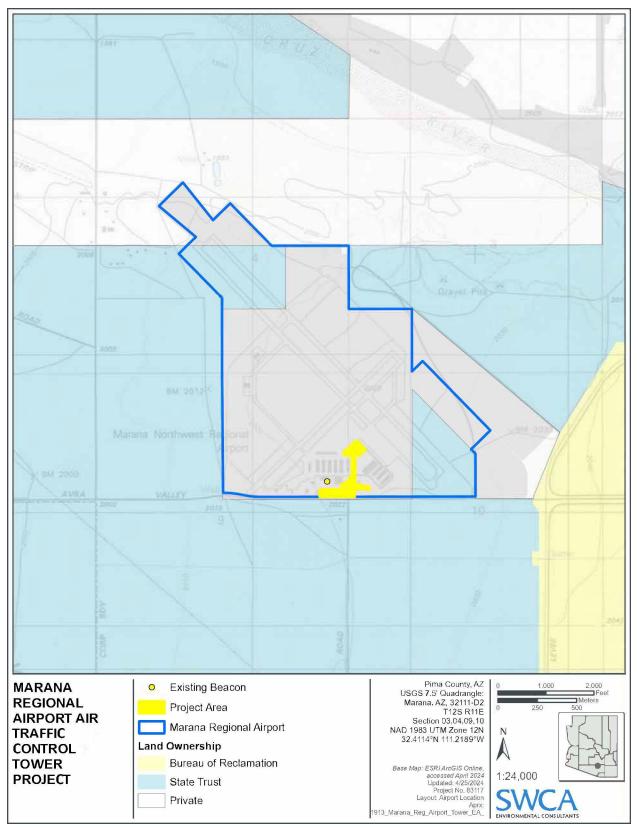


Figure 2. Project location and footprint.

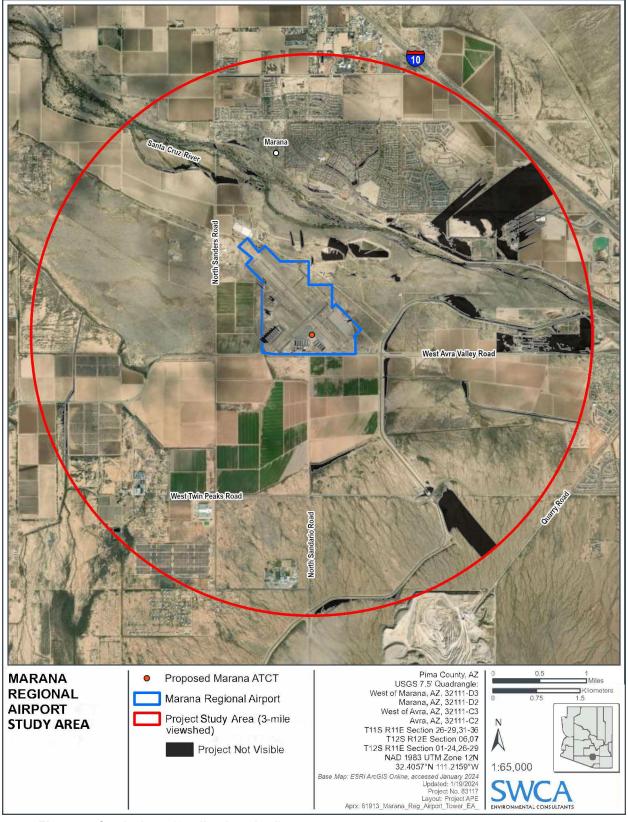


Figure 3. Study Area (3-mile viewshed).

Agency Input Form

Date: 5.28.2024

Name and Title: Carmen Rose - State Airport Engineer					
Organization Arizona Department of Transportation (ADOT)					
Contact information (email, address) crose@azdot.gov					
Phone: 602-851-5295					
Preferred method of communication:					
Does your agency have any jurisdiction by law (such as land jurisdiction, permitting authority) or special expertise in the Study Area?: ☐ YES ■ NO					
f yes, would you like to be considered a ☐ Cooperating Agency or ☐ Participating Agency?					
Would you like to continue to receive project information? ■YES □ NO					
If so, what is your preferred method of receiving information: ■email □ hard copy					
Does your agency have any input on which issues may be significant or insignificant based on your agency's experience and expertise? Please describe your concerns:					
N/A					
Does your agency have any information regarding relevant data sources related to these issues of concern identified above? Please feel free to email documents or links to theresa.knoblock@swca.com N/A					
Please provide any information you have available regarding past and future projects under your jurisdiction that have occurred within the Study Area within the last 5 years or that are anticipated within the next 5 years. This information will be considered in the cumulative impact analysis in our NEPA review.					
An ADOT grant funded the recently completed East Hangar Apron Reconstruction project					
The East Hangar Apron including the associated taxilane is located adjacent to the project area.					
Please identify any planning activities within your agency jurisdiction that may be affected by project implementation such as general plans or capital improvement projects in the Study Area.					
ADOT will be undertaking an update to the State Aviation System Plan which inventories all infrastructure					
at the Arizona Public use airports. Any planned infrastructure updates at AVQ will need to be documented.					

From: Tracy Bazelman <tbazelman@azgfd.gov>

Sent: Monday, July 1, 2024 11:50 AM

To: Theresa Knoblock <Theresa.Knoblock@swca.com>

Cc: Project Evaluation Program - Game and Fish <pep@azgfd.gov>

Subject: AZGFD Review of the M24-06031108 Proposed Control Tower at Marana Regional

Airport in Marana, Pima County, Arizona

Ms. Knoblock

The Department has reviewed your attached Project Evaluation Request for the M24-06031108 Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona.

As the proposed project is located in a previously disturbed area on the airport, with the present habitat providing relatively low value to wildlife, the Department does not anticipate any significant adverse impacts to wildlife resources would occur as a result of this project. This email serves as the Department's official response.

If you have any questions or concerns please feel free to contact me.

Kind regards, Tracy C. Bazelman

AZGFD# M24-06031108

TRACY C. BAZELMAN | PROJECT EVALUATION SPECIALIST

ARIZONA GAME AND FISH DEPARTMENT

OFFICE: 623-236-7513 MOBILE: 602-578-9944

EMAIL: tbazelman@azgfd.gov

azgfd.gov | 5000 W. Carefree Highway, Phoenix, AZ 85086

Join our new Conservation Membership program and ensure a wildlife legacy for the future.



Project Evaluation Program - Game and Fish <pep@azgfd.gov>

Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

1 message

Theresa Knoblock <Theresa.Knoblock@swca.com>
To: "pep@azgfd.gov" <pep@azgfd.gov>

Thu, May 23, 2024 at 12:47 PM

This letter serves as our agency's invitation to review a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona and provide input on any concerns, suggestions or recommendations pertaining to this project. This letter is also your invitation to continue to receive information about the project during the NEPA evaluation. If your agency has a continuing interest in this project, please indicate that you would like to be included as a cooperating agency or participating agency.

Please submit your comments or concerns within 30 days (by June 24, 2024) to the Town of Marana c/o Theresa Knoblock, SWCA Environmental Consultants, 343 West Franklin Street, Tucson, Arizona 85701 by mail or email directly to theresa.knoblock@swca.com. Thank you for your time and assistance.

Thank you,

Theresa Knoblock Senior Lead - Tucson

SWCA Environmental Consultants

343 W Franklin Street

Tucson, Arizona 85701

P 520.325.9194 | D 520.402.4127

theresa.knoblock@swca.com



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Cheri Boucher_Marana Regional Airport_05232024.pdf

Ryan Rausch

From: Dingman, Colleen J <cjdingman@blm.gov>

Sent: Friday, May 24, 2024 1:26 PM

To: Theresa Knoblock

Subject: Re: [EXTERNAL] Scoping for a Proposed Control Tower at Marana Regional Airport in

Marana, Pima County, Arizona

Thank you for sending this.

The BLM has no comments on the Proposed Control Tower. No further information is needed.

Colleen Dingman Field Manager Tucson Field Office 3201 E. Universal Way Tucson, AZ 85756

520.258.7201 (desk) 520.833.0841 (cell)

From: Theresa Knoblock <Theresa.Knoblock@swca.com>

Sent: Thursday, May 23, 2024 12:50 PM **To:** Dingman, Colleen J <cjdingman@blm.gov>

Subject: [EXTERNAL] Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

This email has been received from outside of DOI - Use caution before clicking links, opening attachments, corresponding.

This letter serves as our agency's invitation to review a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona and provide input on any concerns, suggestions or recommendations pertaining to this project. This letter is also your invitation to continue to receive information about the project during the NEPA evaluation. If your agency has a continuing interest in this project, please indicate that you would like to be included as a cooperating agency or participating agency.

Please submit your comments or concerns within 30 days (by June 24, 2024) to the Town of Marana c/o Theresa Knoblock, SWCA Environmental Consultants, 343 West Franklin Street, Tucson, Arizona 85701 by mail or email directly to theresa.knoblock@swca.com. Thank you for your time and assistance.

Thank you,

From: Ryan Johnson <rjohnson@cap-az.com>

Sent: Monday, June 24, 2024 1:51 PM

To: Theresa Knoblock <Theresa.Knoblock@swca.com>; gsendlak@maranaaz.gov

Cc: Thomas Fitzgerald <ffitzgerald@cap-az.com>

Subject: FW: Scoping for a Proposed Control Tower at Marana Regional Airport

Resending with Mr. Sendlak's corrected email.

From: Ryan Johnson < rjohnson@cap-az.com >

Sent: Monday, June 24, 2024 1:48 PM

To: theresa.knoblock@swca.com; gsendlak@marana.gov

Cc: Thomas Fitzgerald < tfitzgerald@cap-az.com>

Subject: Scoping for a Proposed Control Tower at Marana Regional Airport

Theresa Knoblock Greg Sendlak

CAWCD does not believe that the proposed project will have any impacts to CAWCD and its operation and maintenance of the CAP. Regarding the requested information on the Agency Input Form:

Date: June 24, 2024

Ryan Johnson, CAP Engineering Services Manager Central Arizona Water Conservation District / Central Arizona Project

623-869-2223

- 1. Method of communication: email
- 2. Does your agency have any jurisdiction by law (such as land jurisdiction, permitting authority) or special expertise in the Study Area?
 - a. YES CAWCD is responsible for maintenance of lands owned by US Bureau of Reclamation
- 3. If yes, would you like to be considered a cooperating agency or participating agency
 - a. CAWCD does not need to be Cooperating or Participating, but we can be involved in the project in any manner that is most helpful to the Town of Marana.
- 4. Would you like to continue to receive project information?
 - a. No
- 5. Preferred method?
 - a. Email
- 6. Does your agency have any input on which issues may be significant or insignificant based on your agency's experience or expertise?
 - a. It does not appear that lands or facilities operated and maintained by this project will be impacted.
- 7. Does your agency have any information regarding relevant data sources related to these issues of concern identified above?
 - a. No concerns identified.
- 8. Please provided any information you have available regarding past and future projects under your jurisdiction that have occurred within the Study Area within the las 5 years or that are anticipated within the next 5 years. This information will be considered in the cumulative impact analysis in our NEPA review

- a. There are no significant projects in this area for CAWCD that would be impacted by the project.
- 9. Please identify any planning activities within your agency jurisdiction that may be affected by the project implementation such as general plans or capital improvement project in Study Area
 - a. There are no general plans or capital improvement projects in this area that would be impacted by the proposed project.

Thank you, Ryan Johnson

Ryan Johnson

ENGINEERING SERVICES MANAGER

O (623) 869-2223 M (602) 689-3857

E rjohnson@cap-az.com

L 23636 North 7th Street, Phoenix, Arizona 85024







Central Arizona Project Disclaimer:

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Ryan Rausch

Theresa Knoblock From:

Sent: Thursday, June 6, 2024 12:48 PM

To: Greg Sendlak

Subject: FW: Agency Input Form **Attachments:** Agency Input Form.pdf

From: Scott Hamblen <SHamblen@nwfdaz.gov>

Sent: Thursday, June 6, 2024 12:40 PM

To: Theresa Knoblock <Theresa.Knoblock@swca.com>

Subject: Agency Input Form

Good afternoon, Theresa,

Thank you for including us. Please see the attached Agency Input Form from Northwest Fire District.

Thanks, Scott

SCOTT HAMBLEN

Assistant Chief - Administration Services



DIRECT 520-887-1010 Ext. 3157 **MOBILE** 520-730-1746 SHamblen@nwfdaz.gov NORTHWEST FIRE DISTRICT 13535 N. Marana Main Street Marana, AZ 85653 www.nwfdaz.gov

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Agency Input Form

Date: 06/06/2024
Name and Title: Scott Hamblen, Assistant Chief
Organization Northwest Fire District
Contact information (email, address) shamblen@nwfdaz.gov
Phone: 520-887-1010
Preferred method of communication: ☑ email ☐ hard copy letter
Does your agency have any jurisdiction by law (such as land jurisdiction, permitting authority) or special expertise in the Study Area?: ☑ YES □ NO
If yes, would you like to be considered a ☑Cooperating Agency or ☐ Participating Agency?
Would you like to continue to receive project information? ☑ YES □ NO
If so, what is your preferred method of receiving information: ☑ email ☐ hard copy
Does your agency have any input on which issues may be significant or insignificant based on your agency's experience and expertise? Please describe your concerns:
Fire Code Requirements
Does your agency have any information regarding relevant data sources related to these issues of concern identified above? Please feel free to email documents or links to theresa.knoblock@swca.com
Please provide any information you have available regarding past and future projects under your jurisdiction that have occurred within the Study Area within the last 5 years or that are anticipated within the next 5 years. This information will be considered in the cumulative impact analysis in our NEPA review.
Please identify any planning activities within your agency jurisdiction that may be affected by project implementation such as general plans or capital improvement projects in the Study Area.

Ryan Rausch

From: Karl Hoerig <khoerig@pascuayaqui-nsn.gov>

Sent: Thursday, May 23, 2024 3:20 PM

To: Theresa Knoblock

Subject: Re: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima

County, Arizona

Attachments: Marana Regional Airport PYT Response 05232024.pdf

Dear Theresa,

See attached response, and please keep us advised of the progress of this proposed project.

Thanks,

Karl

Karl A. Hoerig, Ph.D.
Tribal Historic Preservation Officer
Pascua Yaqui Tribe
5100 W. Calle Tetakusim, Room 130
Tucson, AZ 85757
(520) 883-5116
karl.hoerig@pascuayaqui-nsn.gov

From: Theresa Knoblock <Theresa.Knoblock@swca.com>

Sent: Thursday, May 23, 2024 2:12 PM

To: Karl Hoerig < khoerig@pascuayaqui-nsn.gov>

Subject: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

CAUTION - Beware External Email - Think Before You Act.

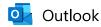
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This letter serves as our agency's invitation to review a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona and provide input on any concerns, suggestions or recommendations pertaining to this project. This letter is also your invitation to continue to receive information about the project during the NEPA evaluation. If your agency has a continuing interest in this project, please indicate that you would like to be included as a cooperating agency or participating agency.

Please submit your comments or concerns within 30 days (by June 24, 2024) to the Town of Marana c/o Theresa Knoblock, SWCA Environmental Consultants, 343 West Franklin Street, Tucson, Arizona 85701 by mail or email directly to theresa.knoblock@swca.com. Thank you for your time and assistance.

Agency Input Form

Date: <u>5/23/2024</u>	
Name and Title: Ka	arl Hoerig, Tribal Historic Preservation Officer
Organization Pa	ascua Yaqui Tribe
Contact information (en	kiloeng@pascaayaqui-nsn.gov 5100 W. Galle Tetakusiini, Kili 150, Tucs
Phone: (520) 883-517	AZ 857
Preferred method of com	nmunication: x email
Does your agency have a expertise in the Study Ar	any jurisdiction by law (such as land jurisdiction, permitting authority) or special ea?: \square YES \times NO
If yes, would you like to b	pe considered a □Cooperating Agency or □ Participating Agency?
Would you like to continu	ue to receive project information? x YES □ NO
If so, what is your preferr	red method of receiving information: x email ard copy
	any input on which issues may be significant or insignificant based on your describe your concerns:
•	community is located just within the 3 mile viewshed, so consultation with community opriate. We also have concerns under NEPA to ensure that heritage resources are not exproposed project.
	any information regarding relevant data sources related to these issues of ? Please feel free to email documents or links to theresa.knoblock@swca.com
jurisdiction that have occ	mation you have available regarding past and future projects under your curred within the Study Area within the last 5 years or that are anticipated within formation will be considered in the cumulative impact analysis in our NEPA
	ning activities within your agency jurisdiction that may be affected by project general plans or capital improvement projects in the Study Area.



Fwd: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

From Theresa Knoblock <Theresa.Knoblock@swca.com>

Date Mon 6/10/2024 2:13 PM

To Greg Sendlak <gsendlak@MARANAAZ.GOV>

Cc Kate Ervin < Kate.Ervin@swca.com>

Thank you,

Theresa Knoblock

Senior Office Lead -Tucson
P 520.325.9194 | C 520.780.1284

From: Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>

Sent: Monday, June 10, 2024 2:12:36 PM

To: Theresa Knoblock <Theresa.Knoblock@swca.com>; Anton, Shane <Shane.Anton@SRPMIC-nsn.gov>; Peter

Steere < Peter. Steere@tonation-nsn.gov>

Cc: Garcia-Lewis, Angela <Angela.Garcia-Lewis@SRPMIC-nsn.gov>; Martinez, Martha

<Martha.Martinez@SRPMIC-nsn.gov>

Subject: RE: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

Dear Ms. Knoblock. The SRPMIC THPO has received your consultation documents dated May 23, 2024. The Town of Marana is designing a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona. Funding and authorization of the project will require approval through the Federal Aviation Administration (FAA) and an amendment to the approved airport layout plan. Because the proposed project requires review and approval from the FAA (a federal agency), review under the National Environmental Policy Act (NEPA) is required. The SRPMIC THPO has reviewed your consultation letter and has no comments at this time but our office defers to the Tohono O'odham Nation THPO as lead in the consultation process.

Thank you

B. Sunday Eiselt Ph.D
THPO Archaeologist
Salt River Pima-Maricopa Indian Community
10,005 E. Osborn Road
Scottsdale, AZ 85256
Sunday.Eiselt@srpmic-nsn.gov
Office: (480) 362 3347
Cid:image001.png@01D8227D.4B733F10

From: Theresa Knoblock <Theresa.Knoblock@swca.com>

Sent: Thursday, May 23, 2024 3:32 PM

To: Anton, Shane <Shane.Anton@SRPMIC-nsn.gov>

Cc: Garcia-Lewis, Angela <Angela.Garcia-Lewis@SRPMIC-nsn.gov>; Martinez, Martha <Martha.Martinez@SRPMIC-nsn.gov>; Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>

Subject: FW: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

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This letter serves as our agency's invitation to review a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona and provide input on any concerns, suggestions or recommendations pertaining to this project. This letter is also your invitation to continue to receive information about the project during the NEPA evaluation. If your agency has a continuing interest in this project, please indicate that you would like to be included as a cooperating agency or participating agency.

Please submit your comments or concerns within 30 days (by June 24, 2024) to the Town of Marana c/o Theresa Knoblock, SWCA Environmental Consultants, 343 West Franklin Street, Tucson, Arizona 85701 by mail or email directly to theresa.knoblock@swca.com. Thank you for your time and assistance.

Thank you,
Theresa Knoblock
Senior Lead - Tucson

SWCA Environmental Consultants

343 W Franklin Street
Tucson, Arizona 85701
P 520.325.9194 | D 520.402.4127
theresa.knoblock@swca.com



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Ryan Rausch

From: Jennifer Mangialardi <jmangialardi@MARANAAZ.GOV>

Sent: Monday, June 17, 2024 7:45 AM

To: Theresa Knoblock
Cc: Jeffrey Pridgett

Subject: Agency Input MPD - Scoping for a Proposed Control Tower at Marana Regional Airport

in Marana, Pima County, Arizona

Attachments: Agency Input 20240617.pdf

Good morning,

I've attached the comments from Chief Pridgett. Please feel free to reach out if you have any questions.

Thank you,

Jen Mangialardi, CPM

Administrative Supervisor PSPRS Local Board Secretary Marana Police Department 11555 W. Civic Center Drive, Bldg. D Marana, AZ 85653

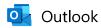
Phone: 520.382.2042 www.maranaaz.gov

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Agency Input Form

Date: 6/11/24
Name and Title: TEFF PRINCETT CHIEF OF POLICE Organization
Organization MARANA
Contact information (email, address) Thidgett @ maranagz.gov
Phone: 520-382-2000
Preferred method of communication: ☑ email □ hard copy letter
Does your agency have any jurisdiction by law (such as land jurisdiction, permitting authority) or special expertise in the Study Area?: ☑ YES □ NO
If yes, would you like to be considered a ☑Cooperating Agency or ☐ Participating Agency?
Would you like to continue to receive project information? ☑ YES □ NO
If so, what is your preferred method of receiving information: ☐ email ☐ hard copy
Does your agency have any input on which issues may be significant or insignificant based on your agency's experience and expertise? Please describe your concerns:
NONE.
Does your agency have any information regarding relevant data sources related to these issues of concern identified above? Please feel free to email documents or links to theresa.knoblock@swca.com
NONE.
Please provide any information you have available regarding past and future projects under your jurisdiction that have occurred within the Study Area within the last 5 years or that are anticipated within the next 5 years. This information will be considered in the cumulative impact analysis in our NEPA review.
NONE.
Please identify any planning activities within your agency jurisdiction that may be affected by project implementation such as general plans or capital improvement projects in the Study Area.
NONE.



Fwd: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

From Theresa Knoblock <Theresa.Knoblock@swca.com>

Date Tue 6/4/2024 2:13 PM

To Greg Sendlak <gsendlak@MARANAAZ.GOV>

Cc Kate Ervin < Kate. Ervin@swca.com >

1 attachments (197 KB)

Section 106 letter.pdf;

Thank you,

Theresa Knoblock

Senior Office Lead -Tucson

P 520.325.9194 | C 520.780.1284

From: Mark Altaha <MarkAltaha@wmat.us> Sent: Tuesday, June 4, 2024 1:25:55 PM

To: Theresa Knoblock <Theresa.Knoblock@swca.com>

Subject: Re: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

Please refer to the attached tribal consultation letter.

Thank you,

Mark Altaha - THPO White Mountain Apache Tribe Historic Preservation Office Fort Apache, Arizona

From: Theresa Knoblock <Theresa.Knoblock@swca.com>

Sent: Thursday, May 23, 2024 3:01 PM **To:** Mark Altaha < MarkAltaha@wmat.us>

Subject: Scoping for a Proposed Control Tower at Marana Regional Airport in Marana, Pima County, Arizona

This letter serves as our agency's invitation to review a new air traffic control tower (ATCT) at Marana Regional Airport (AVQ) in Marana, Pima County, Arizona and provide input on any concerns, suggestions or recommendations pertaining to this project. This letter is also your invitation to continue to receive information about the project during the NEPA evaluation. If your agency has a continuing interest in this project, please indicate that you would like to be included as a cooperating agency or participating agency.

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Thank you,
Theresa Knoblock
Senior Lead - Tucson

SWCA Environmental Consultants

343 W Franklin Street
Tucson, Arizona 85701
P 520.325.9194 | D 520.402.4127
theresa.knoblock@swca.com



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White Mountain Apache Tribe

Office of Historic Preservation PO Box 1032

Fort Apache, AZ 85926 Ph: (928) 338-3033 Fax: (928) 338-6055

To: Greg Sendlak – Project Manager Public Works Department

Date: June 04, 2024

Re: Marana Regional Airport New Air Traffic Control Tower Project

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; <u>May 23, 2024.</u> In regards to this, please refer to the following statement(s) below.

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed construction of a new air traffic control tower at the Marana Regional Airport, in Marana, Pima County, Arizona.

Please be advised, we have reviewed the information provided, we have determined the proposed project plans will have "No Adverse Effect" to the tribe's traditional cultural resources and/or historic properties. We concur with the proposed project findings.

Thank you for the continued tribal engagement and consultation, and collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark Altaha

White Mountain Apache Tribe – THPO Historic Preservation Office

APPENDIX I

Notice of Availability of Draft Environmental Assessment and Public Comments and Responses

NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL ASSESSMENT

The following agencies and airport stakeholders were provided with a Notice of Availability (NOA) (attached to this appendix) of a Draft Environmental (EA) for the proposed project. These letters are also attached to this appendix:

- Northwest Fire District
- Marana Police Department
- Pascua Yaqui Tribe

The NOA was also published in *The Daily Territorial* and posted on the airport website at: https://www.maranaaz.gov/airport. The NOA and the affidavits of publication are attached.

The airport received one comment letter within the public comment period, which closed on Wednesday, May 21, 2024, at 5:00 pm (PST). This letter is included in this appendix following the affidavits of publication. A response to the comment letter is provided below:

Comment Letter #1: Virgina E. Unger

Summary of Comments:

- a. Appreciated former and current Marana Regional Airport Manager's efforts to oversee the efforts of an air traffic control tower at the airport.
- b. Encouraged to read that the Draft EA found no significant environmental impacts.
- c. Identified Marana Regional Airport as a beautiful, sought-after destination for training, pleasure, and business aviation.

Response:

- a. Comment noted.
- b. Comment noted.
- c. Comment noted as an opinion of commenter.

NOTICE OF AVAILABILITY

OF A DRAFT ENVIRONMENTAL ASSESSMENT ON AN AIRPORT TRAFFIC CONTROL TOWER AT MARANA REGIONAL AIRPORT

Pursuant to Title 49, United States Code (U.S.C) Section 47106(c)(1)(A), notice is hereby given that the Town of Marana proposes to seek Federal Aviation Administration (FAA) approval of the Airport Layout Plan (ALP) for the Marana Regional Airport (AVQ) and the use of federal funds for design and construction of a proposed Airport Traffic Control Tower (ATCT), vehicle access road, vehicle parking area, connection of utilities, and a septic system; relocation of the existing rotating beacon to the top of the proposed ATCT. The proposed ATCT would be centrally located south of the intersections of Runways 12-30 and 3-21.

A Draft Environmental Assessment (EA) has been prepared to evaluate the potential environmental impacts of the proposed action and has been prepared pursuant to the requirements of Section 102(2)(c) of the *National Environmental Policy Act of 1969*, as amended (NEPA) and Section 509(b)(5) of the *Airport and Airway Improvement Act of 1982*, as amended (AAIA). The FAA is the lead agency to ensure compliance with NEPA for airport development actions. The Draft EA was prepared in accordance with FAA Order 1050.1F *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B *National Environmental Policy Act (NEPA) Implementing Instructions for Airport actions*. Pursuant to the federal *Clean Water Act, Clean Air Act, Endangered Species Act, National Historic Preservation Act*, and the *Department of Transportation Act*, the Draft EA includes an analysis of prudent or feasible alternatives, potential impacts, and mitigation measures, as appropriate.

Beginning **April 21, 2025**, this Notice of Availability, as well as the Draft EA, will be available for download by the general public and interested parties at: [https://www.maranaaz.gov/airport]. Reading copies can be reviewed at the following physical locations:

- Ed Honea Marana Municipal Complex
 - 11555 W Civic Center Drive, Marana, AZ 85653

(M-F 8:00 a.m.-5:00 p.m.)

- Marana Regional Airport Administration Office
 - 11700 W Avra Valley Road, Marana, AZ 85653

(M-F 7:00 a.m.-4:00 p.m.)

- Wheeler Taft Abbett, Sr. Library
 - 7800 North Schisler Drive, Tucson, AZ 85743

(M, W 10:00 a.m.-6:00 p.m.; T, Th 10:00 a.m.-7:00 p.m.; F 10:00 a.m.-5:00 p.m.)

FAA Western-Pacific Region, Office of Airports, Phoenix Airports District Office

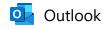
3800 North Central Avenue, Suite 1025, Phoenix, Arizona 85012

(M-F, 9:00 a.m.-4:00 p.m., by appointment only [602-792-1075])

Any comments on the Draft EA should be submitted in writing to the following mailing or email address (email preferred):

Mr. Greg Sendlak, Project Manager
Town of Marana Public Works Department
Capital Improvement Program Division
5100 West Ina Road
Marana, Arizona 85743
gsendlak@maranaaz.gov

The cutoff date for comment submission is not later than 5:00 p.m. local time May 21, 2025. Please allow enough time for mailing. All comments must be received by the deadline, not simply postmarked by that date. Before including your name and telephone number, email, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available.



Marana Regional Airport Traffic Control Tower Project, Draft Environmental Assessment - NOA Public Posting and Comment

From Greg Sendlak <gsendlak@MARANAAZ.GOV>

Date Mon 4/21/2025 2:15 PM

To CONTACT@NWFDAZ.GOV < CONTACT@NWFDAZ.GOV >

Cc Neal, Taylor N (FAA) <taylor.n.neal@faa.gov>; Charlie McDermott <charlie.mcdermott@dibblecorp.com>; Ryan Rausch <RRausch@swca.com>

1 attachment (114 KB)

NOTICE OF AVAILABILITY_DRAFT EA_AVQ_ATCT, Updated 2025-04-14.pdf;

Dear Chief Norman Bradley III, and Assistant Chief Scott Hamblen,

You are receiving this message because during the scoping phase you requested to continue receiving updates and information concerning the proposed airport traffic control tower project at Marana Regional Airport.

This is to inform you that a draft environmental assessment (DEA) document has been prepared and was posted earlier today for a 30-day public review and comment period. Please see the attached Notice of Availability (NOA) outlining the details of this process and the ways in which the DEA can be viewed / downloaded. Please do not hesitate to ask if you have any questions.

Sincerely,

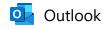
Greg Sendlak

Project Manager Public Works Dept., C.I.P. Division

Town of Marana

5100 W. Ina Rd. Marana, Arizona 85743 (520) 382 2503 Office (520) 437 6600 Mobile gsendlak@maranaaz.gov





Marana Regional Airport Traffic Control Tower Project, Draft Environmental Assessment - NOA Public Posting and Comment

From Greg Sendlak <gsendlak@MARANAAZ.GOV>

Date Mon 4/21/2025 2:32 PM

To Jeffrey Pridgett < jpridgett@MARANAAZ.GOV>

1 attachment (114 KB)

NOTICE OF AVAILABILITY_DRAFT EA_AVQ_ATCT, Updated 2025-04-14.pdf;

Dear Chief Pridgett,

You are receiving this message because on behalf of the Marana Police Department during the scoping phase you requested to continue receiving updates and information concerning the proposed airport traffic control tower project at Marana Regional Airport.

This is to inform you that a draft environmental assessment (DEA) document has been prepared and was posted earlier today for a 30-day public review and comment period. Please see the attached Notice of Availability (NOA) outlining the details of this process and the ways in which the DEA can be viewed / downloaded. Please do not hesitate to ask if you have any questions.

Sincerely,

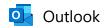
Greg Sendlak

Project Manager Public Works Dept., C.I.P. Division

Town of Marana

5100 W. Ina Rd. Marana, Arizona 85743 (520) 382 2503 Office (520) 437 6600 Mobile gsendlak@maranaaz.gov





Marana Regional Airport Traffic Control Tower Project, Draft Environmental Assessment - NOA Public Posting and Comment

From Greg Sendlak <gsendlak@MARANAAZ.GOV>

Date Mon 4/21/2025 2:27 PM

- To Peter.Yucupicio@pascuayaqui-nsn.gov <Peter.Yucupicio@pascuayaqui-nsn.gov>; Karl.Hoerig@pascuayaqui-nsn.gov>; siki.tavut.74445@gmail.com <siki.tavut.74445@gmail.com>
- Cc Neal, Taylor N (FAA) <taylor.n.neal@faa.gov>; Charlie McDermott <charlie.mcdermott@dibblecorp.com>; Ryan Rausch <RRausch@swca.com>

1 attachment (114 KB)

NOTICE OF AVAILABILITY_DRAFT EA_AVQ_ATCT, Updated 2025-04-14.pdf;

Dear Honorable Chairman Peter Yucupicio, Dr. Karl A. Hoerig, and Mr. Felipe Molina,

You are receiving this message because on behalf of the Pascua Yaqui Tribe (including Yoeme Pueblo community) during the scoping phase you requested to continue receiving updates and information concerning the proposed airport traffic control tower project at Marana Regional Airport.

This is to inform you that a draft environmental assessment (DEA) document has been prepared and was posted earlier today for a 30-day public review and comment period. Please see the attached Notice of Availability (NOA) outlining the details of this process and the ways in which the DEA can be viewed / downloaded. Please do not hesitate to ask if you have any questions.

Sincerely,

Greg Sendlak

Project Manager
Public Works Dept., C.I.P. Division

Town of Marana

5100 W. Ina Rd. Marana, Arizona 85743 (520) 382 2503 Office (520) 437 6600 Mobile gsendlak@maranaaz.gov





AFFIDAVIT OF PUBLICATION

Daily Territorial (Tucson) 100 N Stone Ave, Suite 300, Tucson, AZ 85701 (520) 294-1200

I, Rachel Cozart, of lawful age, being duly sworn upon oath depose and say that I am an agent of Column Software, PBC, duly appointed and authorized agent of the Publisher of Daily Territorial (Tucson), a publication that is a "legal newspaper" as that phrase is defined for the city of Tucson, for the County of Pima, in the state of Arizona, that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and that the attachment hereto contains the correct copy of what was published in said legal newspaper in consecutive issues on the following dates:

Publication Dates:

Apr 21, 2025, Apr 22, 2025, Apr 23, 2025, Apr 24, 2025, Apr 25, 2025, Apr 28, 2025, Apr 29, 2025, Apr 30, 2025, May 1, 2025, May 2, 2025, May 5, 2025, May 6, 2025, May 7, 2025, May 8, 2025, May 9, 2025, May 12, 2025, May 13, 2025, May 14, 2025, May 15, 2025, May 16, 2025, May 19, 2025, May 20, 2025, May 21, 2025

Notice ID: fyjyVxdRRCWLOfaQpySO

Notice Name: NOA Environmental Assessment: Airport Traffic

Publisher ID: DTT009777

Request of: Town of Marana 11555 W. Civic Center Drive, Marana, Arizona 85653

I declare under penalty of perjury that the foregoing is true and correct.

Rachel Cozart

Agent



VERIFICATION

State of Florida County of Broward

Signed or attested before me on this: 05/21/2025

Notery Public

Notarized remotely online using communication technology via Proof.

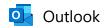
a Draft Environmental Assessment on an Airport Traffic Control Tower at Marana Regional Airport Pursuant to Title 49, United States Code (U.S.C) Section 47106(c)(1)(A), notice is hereby given that the Town of Marana proposes to seek Federal Aviation Administra tion (FAA) approval of the Airport Layout Plan (ALP) for the Marana Regional Airport (AVQ) and the use of federal funds for design and construction of a proposed Airport Traffic Control Tower (ATCT), vehicle access road, vehicle parking area, connection of utilities, and a septic system; relocation of the existing rotating beacon to the top of the proposed ATCT. The proposed ATCT would be centrally located south of the intersections of Runways 12-30 and 3-21. A Draft Environmental Assessment (EA) has been prepared to evaluate the potential environmental impacts of the proposed action and has been prepared pursuant to the requirements of Section 102(2)(c) of the National Environmental Policy Act of 1969, as amended (NEPA) and Section 509(b) (5) of the Airport and Airway Improvement Act of 1982 as amended (AAIA). The FAA is the lead agency to ensure compliance with NEPA for airport development actions. The Draft EA was prepared in accordance with FAA Order 1050.1F Environmen tal Impacts: Policies and Procedures, and FAA Order 5050.4B National Environmental Policy Act (NEPA) Implementing Instructions for Airport actions. Pursuant to the federal Clean Water Act. Clean Air Act, Endangered Species Act, National Historic Preservation Act and the Department of Transportation Act, the Draft EA includes an analysis of prudent or feasible alternativ es, potential impacts, and mitigation measures, as appropriate.
Beginning April 21, 2025, this Notice of Availability, as well as the Draft EA, will be available for download by the general public and interested parties at: https://www.maranaaz.gov/ airport]. Reading copies can be reviewed at the following

Notice of Availability of

physical locations: Ed Honea Marana Municipal Complex 11555 W Civic Center Drive, Marana, AZ 85653 (M–F 8:00 a.m.–5:00 p.m.) Marana Regional Airport Administration Office 11700 W Avra Valley Road, Marana, AZ 85653 (M–F 7:00 a.m.–4:00 p.m.). Wheeler Taft Abbett, Sr. Wheeler latt Abbett, Sr.
Library
7800 North Schisler Drive,
Tucson, AZ 85743
(M, W 10:00 a.m.–6:00 p.m.;
T, Th 10:00 a.m.–7:00 p.m.;
F 10:00 a.m.–5:00 p.m.)
FAA Western-Pacific Region,
Office of Airports, Phoenix Office of Airports, Phoenix Airports District Office 3800 North Central Avenue, Suite 1025, Phoenix, Arizona 85012 (M-F, 9:00 a.m.-4:00 p.m., by appointment only [602-792-1075])

Any comments on the Draft EA should be submitted in writing to the following mailing or email address (email preferred):
Mr. Greg Sendlak, Project Manager
Town of Marana Public Works Department
Capital Improvement
Program Division
5100 West Ina Road
Marana, Arizona 85743
gsendlak@maranaaz.gov

The cutoff date for comment submission is not later than 5:00 p.m. local time May 21, 2025. Please allow enough time for mailing. All comments must be received by the deadline, not simply postmarked by that date. Before including your name and telephone number, email, or other personal identifying information in your comment, be advised that your entire comment — including your personal identifying information — may be made publicly available.
Publish: The Daily Territorial Date: April 21, 22, 23, 24, 25, 28, 29, 30, May 1, 2, 5, 6, 7, 8, 9, 12, 13, 14, 15, 16, 19, 20 and 21, 2025 DTT009777



FW: Comment, DRAFT, ENVIRONMENTAL ASSESSMENT PROPOSED AIRPORT TRAFFIC CONTROL TOWER MARANA REGIONAL AIRPORT PIMA COUNTY, ARIZONA

From Greg Sendlak <gsendlak@MARANAAZ.GOV>

Date Tue 5/20/2025 7:22 AM

To Neal, Taylor N (FAA) <taylor.n.neal@faa.gov>

Cc Eryn Guevara <eryn.guevara@dibblecorp.com>; Ryan Rausch <RRausch@swca.com>; Fausto Burruel <fburruel@MARANAAZ.GOV>; Charlie McDermott <charlie.mcdermott@dibblecorp.com>; Jennifer Flood <ip>ijflood@MARANAAZ.GOV>; gbeem <gbeem@MARANAAZ.GOV>

1 attachment (463 KB)

Draft environmental, comment Marana ATCT Unger .pdf;

Good Morning Taylor-

We received the first official comment regarding the Draft EA early this morning. Please see below and attached.

Thank-You,

Greg Sendlak

Project Manager
Public Works Dept., C.I.P. Division

Town of Marana

5100 W. Ina Rd. Marana, Arizona 85743 (520) 382 2503 Office (520) 437 6600 Mobile gsendlak@maranaaz.gov



From: Lee Unger < leeunger4@gmail.com> Sent: Tuesday, May 20, 2025 1:02 AM

To: Greg Sendlak <gsendlak@MARANAAZ.GOV>

Cc: Galen Beem <gbeem@MARANAAZ.GOV>; Craig Tompkins, FPM <Craig.Tompkins@faa.gov>; Ernie Ernest

Copeland <Ernest.R.Copeland@faa.gov>; Cary Grant <cbgrant@azboss.net>

Subject: Comment, DRAFT, ENVIRONMENTAL ASSESSMENT PROPOSED AIRPORT TRAFFIC CONTROL TOWER MARANA REGIONAL AIRPORT PIMA COUNTY, ARIZONA

PLEASE BE CAUTIOUS

THIS MESSAGE AND SENDER COME FROM OUTSIDE THE TOWN OF MARANA. IF YOU DID NOT EXPECT THIS MESSAGE, PROCEED WITH CAUTION. VERIFY THE SENDER'S IDENTITY BEFORE PERFORMING ANY ACTION. SUCH AS CLICKING ON A LINK OR OPENING AN ATTACHMENT.

Hello, Mr. Greg Sendlak, Project Manager Town of Marana Public Works Department, Capital Improvement Program Division

Re: DRAFT, ENVIRONMENTAL ASSESSMENT PROPOSED AIRPORT TRAFFIC CONTROL TOWER MARANA REGIONAL AIRPORT PIMA COUNTY, ARIZONA

Attached please find my comments on the environmental assessment for the proposed airport traffic control tower at Marana Regional Airport.

As an advocate for aviation safety, an operating control tower at Marana cannot come soon enough.

Thank you for working toward having an operating air traffic control tower at Marana Regional!

Sincerely, Lee Unger FAASTeam Representative 520-990-3792 May 20, 2025

Greg Sendlak, Project Manager

Town of Marana Public Works Department, Capital Improvement Program Division

5100 West Ina Road Marana, Arizona 85743

gsendlak@maranaaz.gov

Re: DRAFT, ENVIRONMENTAL ASSESSMENT PROPOSED AIRPORT TRAFFIC CONTROL TOWER MARANA REGIONAL AIRPORT PIMA COUNTY, ARIZONA

Dear Mr. Sendlak,

Thank you for accepting comments on the comprehensive draft of the environmental assessment of the proposed air traffic control tower for Marana Regional Airport. As a local flight instructor and aviation safety volunteer, I appreciate the dedication to aviation safety that Galen Beem, Airport Superintendent, and Steve Miller before him, have consistently displayed with patience and sure guidance to see the air traffic control tower project to this promising point.

With Marana Regional's diversity of operations and high traffic count, it is encouraging to see that the environmental impact of constructing, followed by operating, a control tower is well within acceptable parameters.

Marana Regional is a beautiful airport, a sought-after destination for training, pleasure, and business aviation. Thank you, the Town of Marana, and Galen Beem for your efforts to construct and operate an air traffic control tower, to improve safety for all operators at Marana Regional in the years ahead.

Sincerely,

Virginia E. "Lee" Unger

FAA Safety Team Representative

Mirginia S. "Lee" Mnger

1620 W. Chimayo Pl.

Tucson, AZ 85704

520-990-3792

leeunger4@gmail.com