

**Appendix C**  
**Section 4(f) Statement**



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

January 24, 2022

4112.1  
ER 21/0537

Scott Tener, P.E.  
Environmental Specialist  
U.S. Department of Transportation  
Federal Aviation Administration  
901 Locust  
Kansas City, MO 64106

## **Re: Draft Section 4(f) Statement for the Proposed Replacement Terminal Project at the Mason City Municipal Airport, Cerro Gordo County, Iowa**

Dear Scott Tener:

The Department of the Interior (Department) has reviewed the Draft Section 4(f) evaluation for the construction of the proposed Replacement Passenger Terminal and other associated projects at the Mason City Municipal Airport, in Cerro Gordo County, Mason City, Iowa.

The project is a federally assisted undertaking, therefore falling under the requirements of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). Section 106 requires Federal agencies to take into consideration the effects of their undertakings on historic properties, and to offer the Advisory Council on Historic Preservation an opportunity to comment on such undertakings.

### **Background Information**

The City of Mason City, Iowa proposes the development of a replacement passenger terminal and other associated projects. The existing terminal building at Mason City Municipal Airport (MCW) was constructed in 1965. The building consists of approximately 14,300 square feet, inclusive of 10,700 square feet on the ground level and 3,600 square feet on the second level. The Redevelopment Proposed Action includes the following major elements:

- Construct a new terminal facility with all public spaces on one level west of the existing terminal to meet current building codes, Americans with Disabilities Act (ADA) requirements, and Transportation Security Administration (TSA) standards for passenger terminal facilities.
- Expand the terminal apron to the west to meet standards for regional jet and narrow body charter operations.

- Extend the access road to provide curbside service to the proposed terminal building to meet Statewide Urban Design and Specifications (SUDAS) standards.
- Expand the parking areas to increase capacity to meet local municipality parking requirements.
- Demolish (partial or full) the existing terminal, FAA annex, and restaurant.

The FAA has determined that the Mason City Municipal Airport is eligible for the National Register of Historic Places (NRHP) as a Historic District and three historic buildings at the Airport are individually eligible for inclusion in the NRHP under Criteria A and C. Therefore, the historic district, its contributing resource and the individually eligible resources are considered Section 4(f) resources. The proposed action includes an adverse effect on the existing terminal. The adverse effect is being mitigated through a Memorandum of Agreement (MOA) per Section 106 of the National Historic Preservation Act (NHPA) between the Federal Aviation Administration (FAA), the Iowa State Historic Preservation office, the Mason City Historic Preservation Commission, and the Mason City Airport Commission.

#### **Section 4(f) Comments**

According to information provided in the "Mason City Municipal Airport Architectural & Historical Survey and Evaluation Report," the effects would be limited to the buildings at the airport located within its boundary.

Three of the airport buildings were recommended as potentially eligible for the National Register, possibly as a National Historic District, because they retain much of their architectural integrity, specifically of the Mid-Century Modern style. The restaurant (1950), FAA Tower (1962), and Terminal buildings (1966), in conjunction with their unique boulevard-like entrance from the highway emulate the growth and evolution of the public use of air travel. Likewise, the airfield (pre-1948, expanded in 1948), remains largely original in organization, with its primary alterations being extensions to accommodate larger aircraft.

The only National Historic Landmark (NHL) identified is the Surf Ballroom which lies 3.3 miles away from the area of potential effect (APE). According to the report, the NHL would not be impacted by the proposed undertaking and there would be no diminishment of its integrity.

The Department concurs with the above findings and awaits a final, executed MOA between FAA and parties detailing the mitigation measures for this project. The Department has no additional comments at this time. For issues concerning Section 4(f) resources, please contact Christine Gabriel, Regional Environmental Coordinator, National Park Service (IR 3/4/5) at [christine\\_gabriel@nps.gov](mailto:christine_gabriel@nps.gov).

Sincerely,

John Nelson  
Regional Environmental Officer

Electronic distribution: email to [scott.tener@faa.gov](mailto:scott.tener@faa.gov)



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Central Region  
Iowa, Kansas,  
Missouri, Nebraska

901 Locust  
Kansas City, Missouri 64106  
(816) 329-2600

December 23, 2021

Director, Office of Environmental Policy and Compliance  
U.S. Department of the Interior  
1849 C Street, NW (MS 2462-MIB)  
Washington, DC 20240

**Notice of Availability for the Draft Section 4(f) Statement for  
Proposed Replacement Terminal Project  
Mason City Municipal Airport  
Mason City, Cerro Gordo County, Iowa**

A Draft Section 4(f) Statement for the Proposed Replacement Terminal Project at the Mason City Municipal Airport has been prepared. The City of Mason City, Iowa proposes the development of a replacement passenger terminal and other associated projects. The proposed action includes an adverse effect on the existing terminal which is eligible for listing on the National Register of Historic Properties. This adverse effect results in a physical use under Section 4(f) of the Department of Transportation Act of 1966. The adverse effect is being mitigated through a Memorandum of Agreement (MOA) per Section 106 of the National Historic Preservation Act (NHPA) between the Federal Aviation Administration (FAA), the Iowa State Historic Preservation Office, the Mason City Historic Preservation Commission, and the Mason City Airport Commission.

The Draft Section 4(f) Statement is available for public review online at [http://flymcw.com/terminal\\_modernization/](http://flymcw.com/terminal_modernization/). For additional information, the Draft Environmental Assessment and Draft MOA are also available on this website.

We request that you provide any comments by January 25, 2022. If you have any questions, please contact me at [scott.tener@faa.gov](mailto:scott.tener@faa.gov) or (816) 329-2639.

Sincerely,

Scott Tener, P.E.  
Environmental Specialist



# Section 4(f) Statement Mason City Municipal Airport Replacement Terminal

*(To support the FAA's completion of the associated NEPA documentation)*



Mason City Municipal Airport  
Mason City, Iowa

Prepared By:  
Foth Infrastructure and Environment, LLC



February 16, 2022

List of Abbreviations, Acronyms, and Symbols .....	iii
1. Introduction .....	1
2. Description of the Proposed Action.....	1
3. Purpose and Need.....	3
4. Description of the Section 4(f) Resource .....	4
4.1 Name of Owner and Type of Section 4(f) Property .....	6
4.2 Size .....	7
4.3 Visual Information .....	7
4.4 Access and Uses .....	8
4.5 Associated Areas.....	8
5. Alternatives Analysis.....	11
5.1 Feasibility and Prudent Analysis.....	11
5.2 Least Overall Harm Analysis.....	13
5.2.1 Alternative 2: Replacement Terminal Building – West Location (Proposed Action)13	
5.2.2 Alternative 3: Replacement Terminal Building – South Location .....	15
5.2.3 Alternative 4: Renovate Existing Terminal.....	17
5.3 Least Overall Harm Summary.....	18
6. Mitigation.....	21
7. Coordination with Agencies with Jurisdiction over the Section 4(f) Resource .....	21
8. Section 4(f) Statement Conclusion.....	22
9. References .....	22

## **Tables**

Table 5-1 – Least Overall Harm Analysis Summary.....	19
--	----

## **Figures**

Figure 2-1: Proposed Action.....	2
Figure 2-2: Proposed Action: New Terminal - Preliminary Layout.....	2
Figure 4-1: Section 4(f) Historic Structures .....	4
Figure 4-2: Section 4(f) Historic District and Contributing Resources.....	5
Figure 4-3: Existing Terminal Building Layout (Ground Level).....	6
Figure 4-4: MCW Current Property Area and Historic District Boundary .....	7
Figure 5-1: South Terminal Location .....	16
Figure 5-2: Alternative 4 - Renovate and Expand Existing Terminal.....	17

## **List of Abbreviations, Acronyms, and Symbols**

---

ADA	Americans with Disabilities Act
Airport	Mason City Municipal Airport
City	City of Mason City
Commission	Mason City Airport Commission
DOT	Department of Transportation
FAA	Federal Aviation Administration
HUD	United States Department of Housing and Urban Development
MCW	Mason City Municipal Airport
NHPA	National Historic Preservation Act
SHPO	State Historic Preservation Office
TSA	Transportation Security Administration
USDA	U.S. Department of Agriculture

## **1. Introduction**

Section 4(f) of the Department of Transportation (DOT) Act of 1966 protects significant publicly owned parks, recreation areas, or wildlife and waterfowl refuges and public and private historic sites. The Secretary of Transportation may approve a transportation project requiring the use of such land if, after a full evaluation, there is no feasible and prudent alternative to using that land and the project includes all possible planning to minimize harm resulting from the use. Section 4(f) of the DOT Act of 1966 is currently codified as 49 U.S.C. Section 303. This Statement will refer to 49 U.S.C. Section 303 as Section 4(f).

This Section 4(f) Statement addresses the proposed Replacement Terminal Project and other associated projects (the Proposed Action) at the Mason City Municipal Airport (MCW or Airport) in Cerro Gordo County, Mason City, Iowa. The City of Mason City (City) is the owner of the airport and the Mason City Airport Commission (Commission) is responsible for the operations of the airport. The implementation of the Proposed Action would result in the physical use of a Section 4(f) resource.

This Section 4(f) Statement provides the required documentation to demonstrate that there is no prudent and feasible alternative to using Section 4(f) resources in the form of historic properties. This evaluation also outlines the coordination that has occurred and demonstrates that all possible planning to minimize harm to the Section 4(f) resource has occurred.

## **2. Description of the Proposed Action**

The Proposed Action consists of the development and operation of a replacement terminal at the airport. The Proposed Action includes the following major elements:

- Construct a new terminal facility with all public spaces on one level west of the existing terminal.
- Expand the terminal apron to the west.
- Extend the access road to provide curbside service to the proposed terminal building.
- Expand the parking areas to increase capacity.
- Demolish (partial or full) the existing terminal, Federal Aviation Administration (FAA) annex, and restaurant.

The layout of the Proposed Action is depicted on Figure 2-1 and a preliminary schematic of the replacement terminal is shown on Figure 2-2. The red dashed line on Figure 2-2 depicts the proposed secure area boundary.

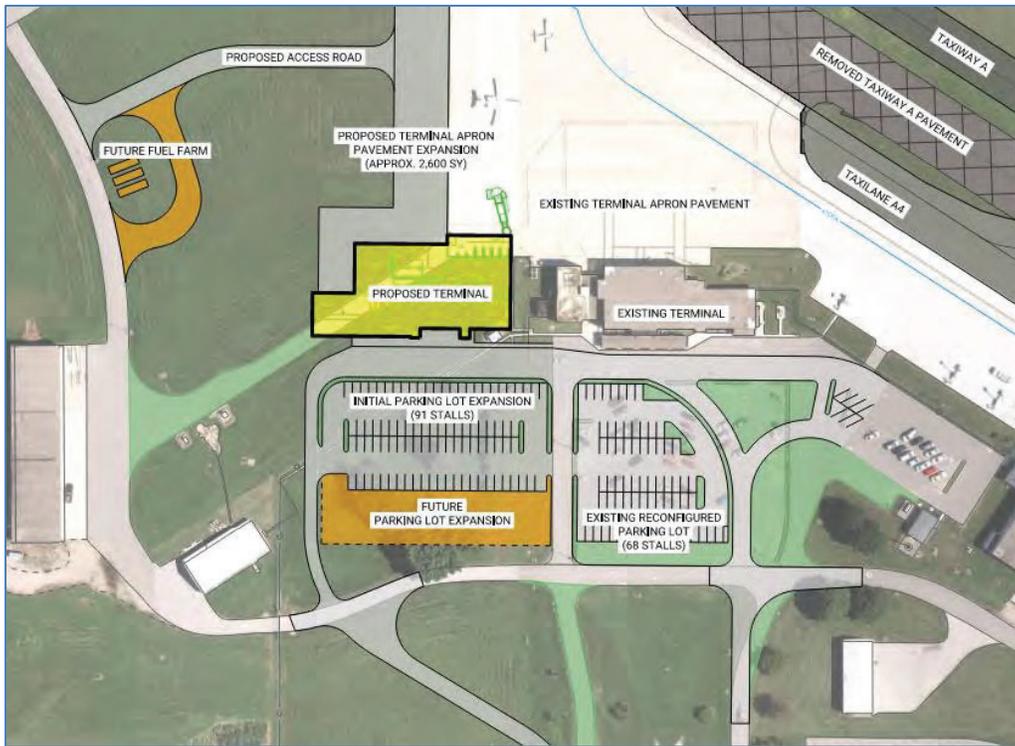


Figure 2-1: Proposed Action



Figure 2-2: Proposed Action: New Terminal - Preliminary Layout

The Proposed Action is anticipated to provide 22,500 square feet of terminal area with the potential to increase to 23,361 square feet if restaurant space is desired. The Proposed Action will expand the passenger parking lot by 40 spaces. The Proposed Action will occur completely

on Airport-owned property and will not include highway improvements. The Proposed Action includes repurposing part or all of the existing terminal building to another aeronautical use if such use is economically viable. This repurposing may require partial demolition of and modernization of the remaining structure. If no aeronautical use can be found for the existing terminal facility then it will be demolished, and the site will be vacant with appropriate ground cover.

### **3. Purpose and Need**

The existing terminal building is inadequate to support current operations at MCW and is in need of significant expansion and modernization. The issue will only intensify with recovery from COVID-19. The following statements present the problems or needs being addressed.

#### **The need to increase the capacity of the public lobby and gatehold area**

The MCW Terminal Narrative Report noted an increase in passenger activity (Foth Infrastructure & Environment LLC, 2021). Historically, the primary aircraft were 9-seaters, eventually increasing to 19-seaters. In 2021, 50-seat regional jets began utilizing MCW. The existing lobby and gatehold areas at the airport are incapable of adequately serving 50-seat regional jets. The current gatehold area is limited to 35 people per fire code restrictions; however, Transportation Security Administration (TSA) screening changes have further reduced the size of the gatehold area, which presently can comfortably accommodate approximately 20 passengers. The lobby and gatehold areas are not large enough to serve 50-seat regional jet service currently needed, nor the projected 75-seat jet service that is anticipated to be served in the future.

Both of these areas are significantly undersized during normal operations, which is of even greater consequence during the COVID-19 pandemic when social-distancing requirements are in place. The gatehold area is critically undersized and cannot accommodate safe social distancing practices.

#### **The need to create an adequate checkpoint screening area**

As the Design Hour Enplanements increased from 9 to 50, the required security screening/checkpoint area also increased. The existing terminal screening area is inadequate to process the increased number of passengers processed through the facility at one time. Additionally, there is no space for the modern equipment that the TSA currently utilizes to effectively screen passengers.

Similarly, during times of increased space requirements experienced during a pandemic such as COVID-19, there are no options for spacing queued passengers while accommodating social distancing requirements, as each area of the terminal is already critically undersized to handle normal operations.

#### **The need to provide adequate inbound/outbound baggage**

The inbound and outbound baggage area is smaller than the required area for 50-seat jet service. Additionally, the baggage area does not include areas to screen baggage out of sight of passengers and does not have space to accommodate modern screening equipment. There is also not a secure area to inspect suspect luggage identified during initial screening.

### **The need to provide an accessible facility**

The public lobby, ticketing, security screening, restrooms, and gatehold room are all significantly undersized and lack the required accessibility accommodations. The second floor of the terminal is not accessible per Federal Americans with Disabilities Act (ADA) requirements. Other portions of the terminal building, such as facility restrooms, are also not ADA compliant. The existing gatehold area has only a single unisex restroom, and there is no family restroom or mother's room.

### **The need to comply with code requirements**

The passenger gatehold area does not meet fire code requirements for the accommodation of passenger numbers associated with larger aircraft. The following code deficiencies have been noted: the existing terminal is not equipped with fire sprinkler system and the second floor knee wall is too short. Additionally, the building is in need of mechanical, lighting, and plumbing upgrades to meet current requirements.

### **The need to address facility deterioration**

There is exterior deterioration at the windows, doors, roof, joints, and architectural finishes. Lead based paint and asbestos are present within the building and will require abatement if the existing terminal is improved.

## **4. Description of the Section 4(f) Resource**

The FAA has determined that the Mason City Municipal Airport is eligible for the National Register of Historic Places (NRHP) as a Historic District and three historic buildings at the Airport are individually eligible for inclusion in the NRHP under Criteria A and C. Therefore, the historic district, its contributing resource and the individually eligible resources are considered Section 4(f) resources. In an email dated August 24, 2021, the Iowa State Historic Preservation Officer (SHPO) concurred with the FAA's determination of an "Adverse Effect" finding. The identified resources are described below (Bergland + Cram, 2021) and the historic structures are depicted on Figure 4-1. Figure 4-2 depicts the historic district and the three contributing resources identified within the historic district.



*Figure 4-1: Section 4(f) Historic Structures*



Figure 4-2: Section 4(f) Historic District and Contributing Resources

### **Mason City Municipal Airport – Historic District**

Of the 30 buildings within the 1,100 acre airport property, six structures are of historic age (greater than 50 years old), including three which have retained much of their architectural integrity, specifically of the Mid-Century Modern style. The restaurant, FAA annex, and terminal building are contributing resources to the Historic District. These structures, in conjunction with the unique boulevard-like entrance from the highway, emulate the growth and evolution of public use of air travel. Likewise, the airfield (pre-1948, expanded in 1948), remains largely original in organization, with alterations to accommodate larger aircraft.

MCW is NRHP eligible as a Historic District. The boundary of the Historic District coincides with the MCW property boundary, as depicted on Figure 4-2. It's unique drive along with the strong influence of the Mid-Century Modern style of the primary buildings make it a unique representation of the development and growth of the aviation industry starting during World War II and after. This, combined with a largely unaltered airfield, indicate the forethought put into planned expansion and growth. The district meets Criteria A and C.

### **MCW Restaurant - Historic Structure**

The MCW Restaurant is eligible for the NRHP. The impetus of the restaurants original development was the federal influx of funds to create revenue generating components at

facilities such as MCW. Its largely unaltered exterior represents the budding style of Mid-Century Modern architecture. The restaurant meets Criteria A and C.

### MCW FAA Annex - Historic Structure

The FAA annex adjacent to the MCW terminal is also eligible for the NRHP. The building's two-story design, with forethought for vertical expansion, solidifies its importance in the development of the federally funded aviation industry. Its simplified design and use of modern materials emulate traditional characteristics of the Mid-Century Modern aesthetic. Its connected relationship to the terminal and restaurant create a sense of significant state-of-the-art ability to patrons of the airport. The FAA annex meets Criteria A and C.

### MCW Terminal - Historic Structure

The MCW Terminal is eligible for the NRHP. Designed in the Mid-Century Modern style, the terminal building continues to exude a sense of validity to the services provided by MCW. A mezzanine provides space for administrative services as well as meeting space. While some alterations have been made to the terminal (both exterior and interior), they were executed in a sympathetic manner that did not greatly affect the overall design. The simple masonry details, common vertical windows and entry massing are all common Mid-Century Modern exterior elements. Terrazzo floors, original seating, and "modern" lighting evoke common interior features. Being the third of three significant structures that were a result of post-World War II federally funded aviation projects, and seizing opportunities created by a rapidly developing and popular means of travel categorize the Terminal as meeting both Criteria A and C. A schematic of the existing terminal, FAA annex, and restaurant layout is shown on Figure 4-3.



Figure 4-3: Existing Terminal Building Layout (Ground Level)

## 4.1 Name of Owner and Type of Section 4(f) Property

The City of Mason City is the owner of the Airport and the Airport Commission is responsible for the operations.

## 4.2 Size

The airport encompasses approximately 30 buildings and structures on approximately 1,100 acres of land, as depicted on Figure 4-4.



*Figure 4-4: MCW Current Property Area and Historic District Boundary*

The current terminal building consists of approximately 14,300 square feet, including 10,700 square feet on the ground level and 3,600 square feet on the second level, as depicted on Figure 4-3. The terminal includes a centrally located lobby where the ticket counters are located, a bag claim and rental car counters on the west end, and a TSA security checkpoint and hold room in the northeast corner of the lobby area. The terminal building includes administration offices and a conference room on the second floor. Two ramp-level gates provide access to aircraft for arriving and departing passengers via existing vestibules.

The Area of Potential Effect encompasses the entire airport property including the airfield and terminal area facilities (see Figure 4-4) with direct impacts located within the area of the existing terminal facility, restaurant, FAA annex, and parking lot (see Figure 4-1).

## 4.3 Visual Information

The MCW Historic District, including the terminal, FAA annex, and restaurant, were constructed with a strong influence of the Mid-Century Modern style and have retained much of their architectural integrity (Bergland + Cram, 2021). The simple masonry details, common vertical

windows, and entry massing are all common Mid-Century Modern exterior elements. Terrazzo floors, original seating, and "modern" lighting evoke common interior features.

#### **4.4 Access and Uses**

Within the terminal building, a centrally located lobby provides access to the ticket counter, bag claim, rental car counters, TSA security checkpoint, and gatehold area. The restaurant and restrooms are located adjacent to the terminal lobby. Administrative offices and a conference room are on the second floor of the terminal building. Two ramp-level gates provide access to aircraft for arriving and departing passengers via external vestibules.

#### **4.5 Associated Areas**

Parking for the facility is located directly south of the terminal building. The boulevard-style drive provides direct access to the parking lot and terminal building from Highway 122 West.



*Photo 1: FAA Tower, Terminal and Restaurant (Bergland + Cram, 2021)*



Photo 2: Terminal (Bergland + Cram, 2021)



Photo 3: FAA Annex (Tower) (Bergland + Cram, 2021)



*Photo 4: Restaurant (Bergland + Cram, 2021)*



*Photo 5: Terminal Interior from Mezzanine (Bergland + Cram, 2021)*



Photo 6: Terminal Interior from Main Floor (Bergland + Cram, 2021)

## 5. Alternatives Analysis

### 5.1 Feasibility and Prudent Analysis

This section provides the analysis to determine if there are any feasible and prudent alternatives that would completely avoid the use of the Section 4(f) resource. Procedural requirements for complying with Section 4(f) are set forth in DOT Order 5610.1C. The FAA also uses Federal Highway Administration/Federal Transit Administration (FHWA/FTA) regulations in 23 CFR part 774 (73 *Federal Register* 13368 [March 12, 2008] and 73 *Federal Register* 31609 [June 3, 2008]) and FHWA guidance (e.g., Section 4(f) Policy Paper (See <https://www.environment.fhwa.dot.gov/legislation/section4f.aspx>), 77 *Federal Register* 42802 [July 20, 2012]). These requirements are not binding on the FAA; however, the FAA may use them as guidance to the extent relevant to aviation projects.

According to the FHWA/FTA regulation at 23 CFR § 774.17:

1. A feasible and prudent alternative is one that avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.
2. An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.
3. An alternative is not prudent if:
  - i. It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
  - ii. It results in unacceptable safety or operational problems;
  - iii. After reasonable mitigation, it still causes:

- A. Severe social, economic, or environmental impacts;
  - B. Severe disruption to established communities;
  - C. Severe disproportionate impacts to minority or low income populations; or
  - D. Severe impacts to environmental resources protected under other Federal statutes;
- iv. It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
  - v. It causes other unique problems or unusual factors; or
  - vi. It involves multiple factors in paragraphs (3)(i) through (3)(v), that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

A preliminary review of various avoidance alternatives was conducted. The review included identifying alternatives that would use other airports for terminal operations and the No Action alternative. The use of other airports in the region was examined to determine if the relocation of passenger operations to another airport would satisfy the project purpose and need. The nearest regional airport to Mason City is the Waterloo Regional Airport, which is 57 miles away. The distance from the nearest airport makes the use of an alternative airport unfeasible. In addition, use of other airports would not meet the stated purpose and need to expand and modernize the existing terminal building so it supports current operations. For these reasons, the use of other airports was not considered a viable avoidance alternative.

Other alternatives were developed that did meet the purpose and need. However, all of these alternatives would involve a use of a 4(f) resource because each alternative would involve demolishing or renovating the existing terminal except for the No Action alternative. All of the alternatives that would involve a use of a 4(f) resource are described in more detail in the Least Overall Harm Analysis. Therefore, only the No Action alternative was evaluated in detail for the feasible and prudent analysis.

### **Alternative 1: No Action**

*Description:* With the No Action alternative, necessary facility maintenance would be completed without any expansion or material change to the facility.

#### *Feasible and Prudent Evaluation*

- The No Action alternative would continue operations as they are today, therefore this alternative would be feasible.
- The No Action alternative would avoid a physical use of the Section 4(f) resource, as limited changes to the existing terminal would be made.
- The No Action alternative would not meet the purpose and need of addressing the fact that the existing terminal building is inadequate to support current operations at MCW and is in need of significant expansion and modernization.

- The No Action alternative would result in unacceptable safety and operational problems. The existing lobby and gatehold areas would continue to violate fire code restrictions when 50-seat regional jet service is in operation. Additionally, the terminal would continue to have inadequate space for the modern TSA equipment needed to effectively screen passengers. The airport would continue to operate with an insufficiently sized baggage area that lacks private baggage screening areas and secure luggage inspection areas. The airport would lack required ADA accessibility accommodations including ADA-compliant access to the second floor of terminal and inadequate restroom facilities. The terminal would continue to be in violation of fire code requirements for larger aircraft, would continue to have code deficiencies, and would continue to need mechanical, lighting, and plumbing upgrades to meet current requirements.

*Summary:* The No Action Alternative is feasible, but is not prudent per 23 CFR § 774.17. There are no feasible and prudent alternatives that completely avoid the Section 4(f) resource.

## **5.2 Least Overall Harm Analysis**

When there are no feasible and prudent alternatives that avoid the Section 4(f) resource, the FAA must select an alternative from among those that use a Section 4(f) resource. However, the FAA must select the alternative that “causes the least overall harm in light of the statute’s preservationist purpose.” (23 CFR 774.3) This section provides the analysis to determine which alternative would cause the “least overall harm.” The least overall harm is determined by balancing the following factors:

- i. The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);
- ii. The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
- iii. The relative significance of each Section 4(f) property;
- iv. The views of the official(s) with jurisdiction over each Section 4(f) property;
- v. The degree to which each alternative meets the purpose and need for the project;
- vi. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
- vii. Substantial differences in costs among the alternatives.

The Commission evaluated creating a new terminal at two potential locations, as well as the alternative of renovating the existing terminal.

### **5.2.1 Alternative 2: Replacement Terminal Building – West Location (Proposed Action)**

*Description:* Alternative 2, which was selected as the preferred alternative, would result in the construction of a new terminal immediately west of the existing facility. The proposed location of the western terminal is depicted on Figure 2-1. The new terminal would have an ADA compliant lobby, restrooms, TSA screening area, gatehold, and luggage areas sized to

accommodate the eventual expansion to 75-seat passenger regional jets. The new terminal would include private and secure baggage screening and inspection areas. The building would be code compliant with updated mechanical, lighting, and plumbing features. Additionally, the new terminal would provide all office and public meeting rooms on the first floor of the building and there would be the ability to expand the terminal to meet future growth needs. Replacing the existing terminal with a new building would eliminate the exterior deterioration issues and asbestos and lead based paint in the existing terminal would be abated and properly disposed of.

Construction of Alternative 2 would require the terminal apron to be expanded approximately 2,600 SY to the west, and the access road would need to be extended to access the curbside of the new terminal building. The parking areas would also need to be expanded to accommodate the passengers associated with the larger aircraft. Figure 2-1 shows a schematic of a potential parking lot and access road reconfiguration.

The new building will be designed to meet current energy code requirements while having updated mechanical, electrical and plumbing systems. The updated building and operational systems will result in reductions in long-term operating costs.

*Least Overall Harm Evaluation:*

- Alternative 2 best meets the purpose and need of the project by expanding and modernizing the terminal building so it supports current operations.
- Alternative 2 would result in a physical use of a Section 4(f) resource with either the eventual demolition of the terminal, restaurant and FAA annex, or the partial demolition and repurposing of the facilities for another aeronautical use. However, a continual mothballing of the terminal that would not be used for aeronautical purposes and generating revenue would not be economically feasible for MCW. The existing terminal is located on the apron in an area designated for aeronautical land use with excellent access to the airfield. At this time there is no entity such as a fixed based operator, cargo operator, or general aviation company that intends to use the terminal for any other aeronautical uses as it stands today without extensive renovation. This renovation would constitute an adverse impact to an individual eligible historic resource and a contributing resource to a historic district under Section 106 and a physical use of a Section 4(f) resource, however, the historic structure could potentially remain in place if used by a general aviation company. Due to the location of the terminal next to an active airfield, the terminal could not be repurposed for non-aeronautical use due to safety, security, and other non-compatible land use concerns. Because of the location and access to the airfield for possible future aeronautical uses, it is not likely that the FAA would grant permission for this land to be designated for non-aeronautical use.
- The SHPO has been consulted regarding the proposed project and they concur there are no mitigation measures under this alternative that would avoid the physical use of the Section 4(f) resource. The adverse impact would be the full demolition of the FAA annex and renovation or demolition of the terminal and restaurant.
- Alternative 2 is estimated to cost \$10.8 to \$14 million. While construction of a new terminal is more expensive than renovation, the new facility will more efficiently meet space programming requirements, will have all new mechanical, electrical, and plumbing

systems, will be ADA compliant, and will meet current energy efficient design requirements, thus reducing long-term operating costs.

- One goal of MCW was to be able to maintain operations of the airport during the duration of construction and to be able to re-use existing parking and apron areas, where possible. Alternative 2 allows MCW to utilize the existing apron and parking lots with expansions occurring west of the existing facilities. The layout of the new terminal west of the existing building allow operations to continue during construction of the new facility. The existing terminal, apron and parking areas can continue to be used for the duration of construction.

Based on MCW's specific goals and FAA operational requirements, MCW has selected Alternative 2 as the option that best meets the purpose and need compared to the other alternatives. Alternative 2 has been selected as the Proposed Action.

### **5.2.2 Alternative 3: Replacement Terminal Building – South Location**

*Description:* Similar to Alternative 2, Alternative 3 would result in the construction of a new terminal immediately south of the existing facility. The new terminal would have the same features as Alternative 2 with a mirrored building layout, as depicted on Figure 5-1. The new terminal would have an ADA compliant lobby and restroom, as well as TSA screening, gatehold, and luggage areas sized to accommodate the eventual expansion to 75-seat passenger regional jets. The new terminal would include private and secure baggage screening and inspection areas. The building would be code compliant with updated mechanical, lighting, and plumbing features. Replacing the existing terminal with a new building would eliminate the exterior deterioration issues, asbestos, and lead based paint in the existing terminal would be abated and property disposed of.

Alternative 3 has a larger apron area, would require a larger area of parking lot replacement, and more extensive access road reconstruction compared to Alternative 2. For Alternative 3, an estimated 6,650 SY of new apron would need to be added to accommodate airplane access to the new terminal. Since the new terminal building would impact the existing parking lot, the lot would need to be expanded to the south to accommodate passengers during and after construction. Figure 5-1 shows a schematic of a potential parking lot and access road reconfiguration if Alternative 3 were selected.

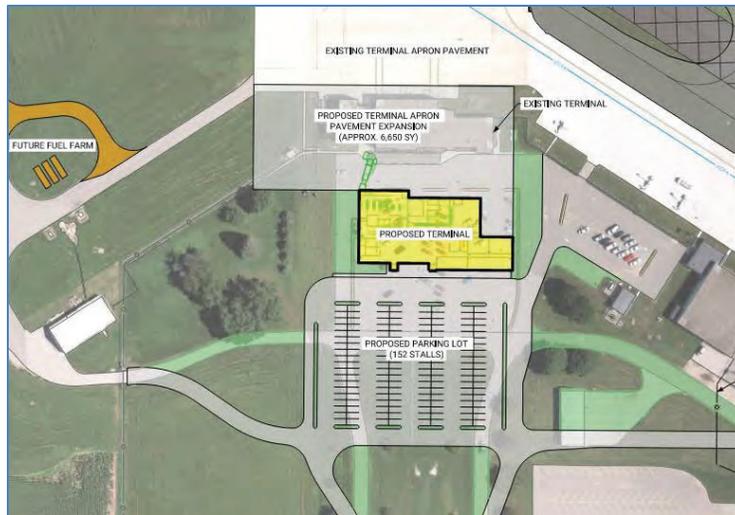


Figure 5-1: South Terminal Location

*Least Overall Harm Evaluation:*

- Alternative 3 would meet the purpose and need of the project by expanding and modernizing the terminal building so it supports current operations.
- Alternative 3 would result in a physical use of a Section 4(f) resource with the eventual demolition of the terminal, restaurant and FAA annex, each of which have equal significance. After operations are transferred to the new replacement terminal, the existing facilities would have to be demolished and converted to an apron expansion. The apron expansion would allow no alternative uses for the existing terminal, FAA annex or restaurant.
- The SHPO has been consulted regarding the proposed project and they concur there are no mitigation measures under this alternative that would avoid the physical use of the Section 4(f) resource. The adverse impact would be the demolition of the terminal, FAA annex, and restaurant.
- Alternative 3 is estimated to cost \$10.8 to \$14 million. While construction of a new terminal is more expensive than renovation, the new facility will more efficiently meet space programming requirements, will have all new mechanical, electrical, and plumbing systems, will be ADA compliant, and will meet current energy efficient design requirements, thus reducing long-term operating costs.
- Alternative 3 has a larger apron area, would require a larger area of parking lot replacement, and more extensive access road reconstruction compared to Alternative 2. The new parking lot would impact a larger proportion of the boulevard entrance to the airport which is a unique feature within the historic district.
- The location of the new terminal building would increase the difficulty of maintaining operations during the duration of construction and would require a more elaborate construction staging plan and management of airport passengers. The existing parking lot will need to be demolished to accommodate the new terminal; therefore the new parking lot would need to be constructed at the beginning of construction. Passengers will need to be safely directed from the new parking lot, around the new terminal

construction zone to the existing terminal while the new terminal is being built. After construction of the new terminal is completed access to the apron will need to be maintained while the existing terminal is demolished and the apron area is expanded to reach the new terminal. The logistics and construction staging of Alternative 3 are more complex than Alternative 2.

The larger apron area, larger parking lot expansion and complexities of construction staging and operations were factors considered in the selection of Alternative 2 as the Proposed Action rather than Alternative 3.

### 5.2.3 Alternative 4: Renovate Existing Terminal

*Description:* Alternative 4 would include renovating and expanding the existing terminal. The renovation would include constructing a new mechanical/electrical utility building. The existing FAA Annex building would be demolished and the existing terminal would be expanded to the west to provide additional area for a security checkpoint and gatehold areas. The terminal would be expanded to the north to accommodate a larger baggage claim area and bag screening. In addition to the expansion, the remaining facility would be renovated to modernize finishes and update maintenance systems. A new elevator would be added to provide ADA compliance to the second floor of the terminal. A schematic of the potential renovation is depicted in Figure 5-2.

Because of the historic nature of the building, it will not be feasible to achieve the energy code requirements during the remodeling. The wall insulation is much less than current standards require, and there is no insulation present below the floor grade of the building; it will not be possible to make these features meet current energy code requirements without physically removing walls and flooring of the entire structure.

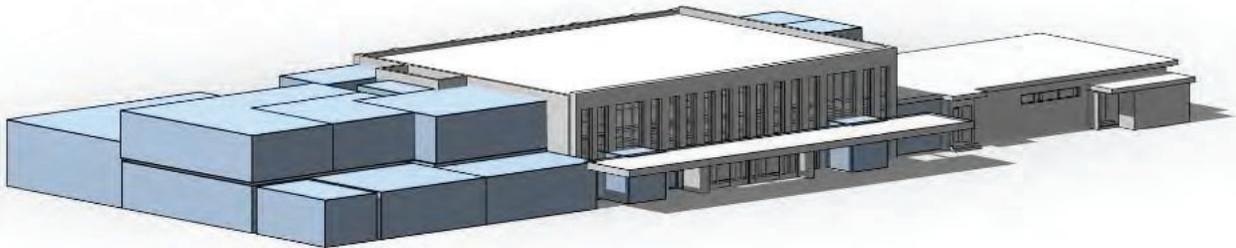


Figure 5-2: Alternative 4 - Renovate and Expand Existing Terminal

#### *Least Overall Harm Evaluation:*

- Alternative 4 would meet the purpose and need of the project by expanding and modernizing the existing terminal building so it supports current operations. The renovation would not address the existing building envelope which does not meet current energy code requirements.
- Alternative 4 would require major renovations to the existing terminal building including expansion to the west and north. The proposed expansion and renovation of the existing structure may physically destroy or damage the property or alter the property in a way

that is inconsistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, which would affect the significance of the architecture of the existing terminal. The change would constitute an adverse impact under Section 106 and a physical use of a Section 4(f) resource the same as if it were demolished.

- Alternative 4 would result in the physical use of a Section 4(f) resource with the demolition of the FAA annex building to accommodate the expansion of the security checkpoint and gatehold areas. This alternative would include renovation of the terminal and restaurant, each of which are eligible for the NRHP. The renovation of the terminal and restaurant likely would constitute an adverse impact under Section 106 and a physical use of a Section 4(f) resource. Renovation would likely physically destroy or damage the property and/or alter the property in a way that is inconsistent with the Secretary of the Interior's Standards for Treatment of Historic Properties.
- The SHPO has been consulted regarding the proposed project and they concur there are no mitigation measures under this alternative that would avoid the physical use of the Section 4(f) resource. The adverse impact would be the demolition of the FAA annex, complete remodeling of the terminal and restaurant and construction of building additions onto the terminal.
- Alternative 4 is estimated to cost \$8.5 to \$11.5 million; however, hidden problems with the existing structure may be encountered during the remodeling, potentially increasing the cost of the project. Additionally, the renovation will not address the existing building envelope which does not meet current energy code requirements. Long-term operation and maintenance costs are anticipated to be more significant with this alternative. During renovation, significant disruption to existing operations will occur as a result of phased construction in an operating building. MCW would be investing significant resources in retrofitting a building that is ill-suited for the needed infrastructure.
- Remodeling the existing building requires more square feet to achieve the same features as a new terminal. Additionally, the layout and functionality of the remodeled terminal would not be as efficient as new construction. The remodeling design requires compromises to be made to retrofit the ill-suited infrastructure to meet the long term needs of the airport. Additionally, continuing operations and maintaining FAA required security measures in an undersized building for the duration of the remodeling project will be significantly difficult.

The difficulties of remodeling an undersized aged structure to meet long-term needs of the airport and the operational challenges during construction were factors considered in the selection of Alternative 2 over Alternative 4.

### **5.3 Least Overall Harm Summary**

As shown on Table 5-1, Alternative 2, constructing a new replacement passenger terminal building at the west location and demolishing (partial or full) the existing FAA annex, terminal, and restaurant has been identified as the alternative that best meets the project purpose and need, results in the best alternative from a constructability and economic standpoint, and causes the least overall harm.

**Table 5-1 – Least Overall Harm Analysis Summary**

<b>Criteria</b>	<b>Alternative 2 West Terminal</b>	<b>Alternative 3 South Terminal</b>	<b>Alternative 4 Renovate Existing</b>
Meets the purpose and need for the project	Yes	Yes	Yes, but does not address building envelope energy code requirements
Ability to mitigate adverse impact to each Section 4(f) property	Yes, mitigation through the implementation of an MOA would be completed. Measures would include a survey and a feasibility study on the reuse of the terminal and restaurant (see Section 6 below).	Yes, mitigation through the implementation of an MOA would be completed. Measures would include a survey but limited mitigation measures exist beyond the completion of a survey.	Yes, mitigation through the implementation of an MOA would be completed. Measures would include a survey but limited mitigation measures exist beyond the completion of a survey.
Relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that quality each Section 4(f) property for protection	If able to repurpose the terminal and restaurant and retain historic integrity of these structures then this alternative results in substantially less harm than Alternatives 3 and 4. However, if unable to repurpose the terminal and restaurant, this alternative results in harm comparable to Alternative 3 (complete demo) and Alternative 4 (substantial renovations).	This alternative results in harm comparable to Alternative 2 (complete demo of the terminal and restaurant) and Alternative 4 (substantial renovations).  This alternative would result in the greatest harm to the historic district by substantially encroaching on the entrance boulevard.	This alternative results in harm comparable to Alternative 2 (complete demo if the terminal and restaurant are unable to be repurposed and retain historic integrity) and Alternative 3 (complete demo).  Demo of FAA annex and substantial renovations of the terminal and restaurant would make the buildings and district not eligible for the NRHP as if they were demolished.

<b>Criteria</b>	<b>Alternative 2 West Terminal</b>	<b>Alternative 3 South Terminal</b>	<b>Alternative 4 Renovate Existing</b>
Relative significance for each Section 4(f) property	Equal	Equal	Equal
Views of the official(s) with jurisdiction over each Section 4(f) property	Equal, acknowledged unavoidable impacts due to the removal and/or renovation of Section 4(f) resources	Equal, acknowledged unavoidable impacts due to the removal of Section 4(f) resources	Equal, acknowledged unavoidable impacts due to the removal and renovation of Section 4(f) resources
After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f)	No adverse impact	No adverse impact	No adverse impact
Substantial differences in costs among the alternatives	\$10.8M-\$14M New mechanical, electrical, and plumbing systems will be more energy efficient and will reduce long-term operating cost	\$10.8M-\$14M New mechanical, electrical, and plumbing systems will be more energy efficient and will reduce long-term operating cost	\$8.5M-\$11.5M Renovation would not address inefficient building envelope and will have higher long-term operating costs based on outdated facilities
Alternative with the least overall harm	Yes, opportunity exists to maintain, with renovation, two Section 4(f) resources consisting of the individually eligible terminal and restaurant and therefore potentially the Historic District	No, three Section 4(f) resources will be demolished which will also result in adverse impacts to, and ineligibility of, the Historic District.	No, one Section 4(f) resource will be demolished and two Section 4(f) resources will be substantially renovated with building additions and thus no longer eligible for listing on the NRHP. This would also result in adverse impacts to, and ineligibility of, the Historic District.

## **6. Mitigation**

After thorough review of the identified alternatives, it was determined that there would be no feasible and prudent alternative that would meet the purpose and need of the project and avoid the use and impact of the terminal facility, a Section 4(f) resource. If the Section 4(f) evaluation concludes there are no feasible and prudent alternatives to the use of Section 4(f) resource, it must also document that the project includes all possible planning to minimize harm or mitigate the Section 4(f) resource. As defined in 23 CFR § 774.17, all possible planning means that all reasonable measures to minimize harm or mitigate for adverse impacts must be included in the project. Currently, the FAA is consulting with MCW and the SHPO to develop a Memorandum of Agreement under Section 106 of the National Historic Preservation Act (Section 106), which outlines the methods by which the terminal, FAA annex, and restaurant may be demolished.

The mitigation measures (stipulations) include:

- i. Performing an Intensive Survey of the terminal, FAA annex, and restaurant and other Waggoner and Waggoner designed buildings within the Mason City area.
- ii. Completing an economic analysis to determine feasibility for the reuse of the terminal, and restaurant for other aeronautical purposes.

## **7. Coordination with Agencies with Jurisdiction over the Section 4(f) Resource**

As a part of the Section 4(f) requirements, the FAA is responsible for soliciting and considering the comments of the Department of Interior and, where appropriate, U.S. Department of Agriculture (USDA), or U.S. Department of Housing and Urban Development (HUD), as well as the appropriate official(s) with jurisdiction over the Section 4(f) property. The Proposed Action does not include the use of a national forest or land holding under the jurisdiction of the U.S. Forest Service; therefore, the USDA does not have jurisdiction of the identified Section 4(f) resource. In addition, because the Section 4(f) resource are building owned and operated by the City, HUD should have no interest in this Section 4(f) resource.

Because the properties that would be used under Section 4(f) are historic properties, the FAA is conducting consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) with the SHPO regarding this project. The following provides the date and summary of the coordination. Copies of the SHPO coordination documents are provided in the Draft EA.

- July 8, 2021 letter from the FAA to SHPO to initiate Section 106 consultation including the Historic Architectural Survey dated June 30, 2021.
- August 24, 2021 email from SHPO to FAA concurring with the FAA's designation of Adverse Effect.
- September 15, 2021 consultation meeting with MCW, Foth Infrastructure & Environment, LLC, FAA and SHPO.

In addition, MCW completed a Public Open House from 4:00 to 6:00 pm on October 5, 2021 at the Mason City Municipal Airport. The intent of the meeting was to inform the public about the Proposed Action and NEPA process and to allow the public to speak to MCW and FAA

representatives. The public was notified about the meeting before the scheduled public meeting date in the September 30, 2021 edition of the Mason City Globe Gazette newspaper. Both a legal ad and display ad were published. In addition, the public was also notified of the public meeting online at <http://flymcw.com> and via the airport's social media channels. In addition to the Open House, a Commission meeting was held on October 11, 2021 where the public was provided the opportunity to comment on the Proposed Action. There were no public attendees to the Commission meeting.

A Public Open House was held on January 18, 2022 and a Public Hearing was held on January 31, 2022 at the Mason City Municipal Airport regarding the draft Environmental Assessment. The intent of the meetings were to inform the public about the Proposed Action and NEPA process and to allow the public to provide comment of the Draft EA, Draft 4(f) Statement, and Draft MOA. The public was notified about the meetings prior to the scheduled public meetings on December 30, 2021 through the Mason City Globe-Gazette newspaper. Both a legal ad and display ad were published. In addition, the public was also notified of the public meetings online at <http://flymcw.com> and via the airport's social media channels. There were no attendees to the January 18, 2022 open house and the only attendees to the public hearing were members of the local press. Three written comments were received during the public comment period, which expired on February 10, 2022. Responses to the written comments were provided in the EA.

## **8. Section 4(f) Statement Conclusion**

There are no alternatives that completely avoid the Section 4(f) resource and are both prudent and feasible. The Proposed Action has been identified as the alternative that causes the least overall harm. Currently, the FAA is consulting with MCW, the SHPO, the Mason City Historic Commission, and other potential consulting parties to develop an agreement under Section 106 of the National Historic Preservation Act (Section 106). The agreement will outline the mitigation measures needed.

The mitigation measures would be a requirement of the Proposed Action and would address the Section 4(f) requirement that the project include all possible planning to minimize harm when there is a use of a Section 4(f) resource. FAA's final determination is withheld until after this draft statement has been circulated to the appropriate agencies and all issues have been appropriately evaluated.

## **9. References**

Bergland + Cram. (2021). *Mason City Municipal Airport Architectural & Historical Survey and Evaluation*. Mason City.

Foth Infrastructure & Environment LLC. (2021). *MCW Terminal Narrative Report*. Johnston.