

U.S. Department of Transportation  
Federal Aviation Administration  
Southwest Region

**Finding of No Significant Impact (FONSI) and Record of Decision (ROD)**

East General Aviation Hangar No. 1 Demolition  
Corpus Christi International Airport  
Nueces County, Texas

June 2023

**1. INTRODUCTION**

The attached Environmental Assessment (EA) identifies and evaluates potential environmental effects related to the demolition of the East General Aviation Hangar No. 1 (Gault Hangar) at Corpus Christi International Airport, Corpus Christi, Nueces County, TX (Airport, CCIA, or CRP).

The Federal Aviation Administration (FAA) is responsible for the approval of the Proposed Action analyzed in the EA, attached hereto. The FAA must comply with the Council on Environmental Quality's (CEQ) National Environmental Policy Act of 1969 (NEPA), other applicable statutes, and the NEPA implementing regulations (40 Code of Regulations (CFR) Parts 1500-1508) before taking any actions that are necessary prior to implementation of the proposed project. After completing an EA, federal agencies must decide whether to issue a Finding of No Significant Impacts (FONSI)/Record of Decision (ROD) and approve the proposed project or prepare an Environmental Impact Statement prior to rendering a final decision on approval of a proposed project. The FAA has completed the EA, considered its analysis, and determined that no further environmental review is required and has determined that the Proposed Action will have no significant impact to the human environment. Therefore, the FAA is issuing this FONSI/ROD accompanied and supported by the attached EA, completing environmental review requirements for the project.

**2. BACKGROUND**

The CCIA is a public use airport that is owned and operated by the City of Corpus Christi (City) and serves both private and commercial airlines. The Airport is located near State Highway (SH) 44, approximately six miles southwest of downtown Corpus Christi and approximately 21 miles from the Gulf of Mexico.

The Airport currently occupies 2,700 acres of land with facilities that include the airfield, aviation, terminal complex, air cargo, air mail, general aviation, other facilities, and utilities. The CCIA East General Aviation (G.A.) Hangar No. 1, also known as the Gault Hangar, is located at 506 Hangar Lane at the Airport. The Gault Hangar is one of the original light aircraft storage facilities from the Airport's construction in 1961.

### 3. REQUESTED FEDERAL ACTION

The Federal actions necessary for implementation of the Proposed Action are:

1. Unconditional approval of the portion of the Airport Layout Plan (ALP) depicting the Proposed Action as described in Chapter 5.0 of the EA, pursuant to 49 U.S.C. §§ 40103(b) and 47107(a)(16);
2. Determinations under 49 U.S.C. §§ 47106 and 47107 relating to the eligibility of the Proposed Action for federal funding under the Airport Improvement Program; and
3. Determinations under 49 U.S.C. § 40117, as implemented by 14 CFR 158.25, to impose and use passenger facility charges (PFC) collected at the airport to assist with construction of potentially eligible items shown on the ALP.

### 4. PURPOSE AND NEED

Pursuant to NEPA, CEQ's Regulations for Implementing NEPA, and FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures*, and 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, an EA must include a description of the purpose of a Proposed Action and the reasons it is needed.

The Proposed Action, demolition of the Gault Hangar, is needed due to safety concerns caused by the deteriorating structure of the hangar. Following structural assessments performed in March 2020 and September 2021, the Gault Hangar was determined to be unsafe and structurally unstable for airport use.

The purpose of the Proposed Action is to address and eliminate safety concerns associated with the deteriorating Gault Hangar. All activities associated with the Proposed Action would meet current FAA Airport Construction Standards per Advisory Circular (AC) 150/5370-10H and other appropriate FAA Advisory Circulars.

### 5. ALTERNATIVES

Two action alternatives and a no action alternative were initially considered to address the need for the Proposed Action. One of the action alternatives was dismissed and not carried forward for further review in this document; this eliminated alternative is described in **Section 4.2** of the attached EA.

The following potential alternatives are evaluated in the attached EA.

## **5.1 Alternatives**

### **5.1.1 Remediate Structural Issues and Recommission the Gault Hangar**

An alternative to remediate the known structural issues and recommission the Gault Hangar was considered. There is a high level of risk to remediate the existing elements to restore the Gault Hangar's structural integrity with a standard factor of safety. Remediation would require a redundant structural system that would bypass and support the existing structure. With the known systemic failures, this approach would require extensive additional effort compared to a traditional design and construction of a new building or improvements to existing buildings. Repairs required to bring the Gault Hangar up to habitable standards would be extensive. The Gault Hangar has two functional flaws that make it undesirable to house and protect aircraft.

First, it does not have a hangar door. This is a feature most tenants expect and would be required to protect stored aircraft. Second, the existing gradual arch design of the building results in reduced ceiling heights near the sides of the hangar. This design limits the possible arrangements of aircraft that could be safely stored, therefore, limiting the usable floor space of the hangar when compared to a traditional, vertical-wall hangar. Therefore, maintaining the existing architecture effectively reduces the usable hangar area by 40 percent.

The costs associated with this alternative would be excessive, with the cost to rehabilitate the Gault Hangar estimated to be \$8 million. Furthermore, this alternative would cover up almost all of the original materials and unique architectural elements that incentivize maintaining the current structure.

### **5.1.2 Demolition of the Gault Hangar (Proposed Action)**

Demolition of the Gault Hangar would include removal of the hangar space and associated office structures. This alternative would eliminate the safety issues and hazards posed by the current condition of the Gault Hangar. The estimated cost for demolition is approximately \$300,000. Additionally, removal of the Gault Hangar would provide an opportunity for the CCIA to construct a more suitable and safer hangar facility to support current airport operations. While a new hangar is not programmed or funded at this time, estimated costs for constructing a new hangar, consistent with the ALP, were estimated to be approximately \$4 million. Both the cost for demolition and the potential to construct a new, more suitable hangar for current airport use is significantly less than rehabilitation of the structure.

### **5.1.3 No Action Alternative**

The No Action Alternative would leave the Gault Hangar in place in its current condition. The Gault Hangar would remain closed to use and abandoned in place. Due to the unsafe nature of the existing structure and the proximity to other occupied structures, the No Action Alternative is not viable because the potential for foreign object debris (FOD) would continue, and the Gault Hangar would pose a safety risk for the immediate area and remain inoperative for airport activity.

Thus, the No Action Alternative would not meet the purpose and need for the project due to the safety implications of the deteriorating hangar. However, this option was retained to satisfy the requirements of NEPA and to maintain a baseline to allow for a comparison of impacts.

## **6. ENVIRONMENTAL CONSEQUENCES**

The environmental impacts, if any, of the proposed alternatives were examined in the attached EA according to the FAA Orders 5050.4B and 1050.1F. The environmental impacts of the No Action and the Proposed Action alternatives are summarized in this section.

Chapter 6.0 of the EA indicates that the following resource categories were not evaluated further in the EA because the resources were not located in proximity or were not pertinent to the proposed project: Climate, Coastal Resources, Farmlands, Natural Resources and Energy Supply, Noise and Noise-Compatible Land Use, Section 6(f) Resources, Socioeconomics, Environmental Justice (EJ), and Children's Health and Safety Risks, Water Resources, including, Floodplains, Surface Waters, and Groundwater. In addition, other resource categories will not be discussed in detail in this FONSI/ROD because, as documented in Chapter 6.0 of the EA, there is not the potential for significant adverse impact (see FAA Order 1050.1F, Paragraph 4-3.3 and Exhibit 4-1 for information on significance thresholds and factors to consider in evaluating significance for an environmental impact category). These categories include: Air Quality, Biological Resources, including Fish, Wildlife, and Plants; Land Use, and Visual Effects.

Implementation of the proposed action has the potential to impact the following resource categories therefore, they are discussed in further detail.

### **6.1 Department of Transportation, Section 4(f)**

Section 4(f) of the US Department of Transportation (USDOT) Act of 1966 (49 U.S.C. § 303(c)) protects important public resources including public parks, recreation areas, wildlife or waterfowl refuges of national, state, or local significance, and historic sites from being harmfully affected by federally funded projects. Historic structures are included if they are on, or are eligible for, the National Register of Historic Places (NRHP).

The Gault Hangar is eligible for listing on the NRHP (see **Section 6.6** of the attached EA for more details) and, therefore, falls under Section 4(f) regulations. Federally funded transportation projects that involve the use of Section 4(f) resources must undergo a formal evaluation and approval process. Compliance with Section 4(f) requirements typically is evaluated during the NEPA decision making phase, concurrent with other environmental and cultural resource studies, and was conducted for the proposed project.

### **6.1.1 No-Action Alternative**

Under the No Action Alternative, no impacts to the Gault Hangar would occur because no changes would be made to the Gault Hangar. The structure of the Gault Hangar would likely continue to deteriorate and may require future maintenance to avoid and minimize safety concerns that might result.

### **6.1.2 Proposed Action**

The Proposed Action would demolish the Gault Hangar and would result in a direct use of the Hangar, a structure eligible for listing on the NRHP. Because the Proposed Action proposes to demolish the Gault Hangar, an Individual Section 4(f) evaluation is required and was performed.

As part of the Section 4(f) process, an alternatives analysis conducted on behalf of the Airport, coordinated with the City and FAA, determined there is no feasible and prudent alternative that meets the purpose and need. Two other alternatives were considered, abandon in place (No Action Alternative) and a remediate alternative. These alternatives are discussed in **Section 4** of the attached EA and the Individual Section 4(f) report and analysis is included in **Appendix E** of the attached EA. On March 28, 2023, the Section 4(f) report was submitted to the Department of Interior (DOI) Office of Environmental Policy and Compliance. On April 26, the DOI provided a letter indicating no objection to Section 4(f) approval for this project.

## **6.2 Historical, Architectural, Archaeological, and Cultural Resources**

A review of the Texas Historical Commission (THC) Historic Sites Atlas was conducted for the study area and no NRHP sites were identified. The FAA coordinated the Proposed Action with the THC also known as the Texas State Historic Preservation Office (SHPO) in March 2021. In a letter dated April 15, 2021, the SHPO determined that the Gault Hangar was eligible for listing in the NRHP under Criterion C for its architectural design and engineering pursuant to Section 106 of the National Historic Preservation Act of 1966. The SHPO correspondence can be found in **Appendix C** of the attached EA.

There are no cemeteries or previously recorded archeological sites within the APE for the Proposed Action. The study area has been previously disturbed and is not conducive to archaeological finds.

### **6.2.1 No-Action Alternative**

The No Action Alternative would not impact any historic, architectural, archeological, or cultural resources.

### **6.2.2 Proposed Action**

During coordination of the Proposed Action with the SHPO, the SHPO provided an adverse effect recommendation in a letter dated April 15, 2021 and responded that if demolition cannot be prevented on the Gault Hangar, then appropriate mitigation measures are to be prepared. In December 2021, FAA provided information to the SHPO including a Structural Observation Report and an alternatives analysis that showed no other feasible alternatives to the Proposed Action.

The SHPO responded confirming the adverse effect and requesting that FAA move forward with developing mitigation. Mitigation efforts are outlined in the Memorandum of Agreement (MOA), located in **Appendix F** of the attached EA and signed by the FAA, the SHPO, the City of Corpus Christi, and the concurring parties. The MOA was filed with the Advisory Council on Historic Preservation on June 7, 2023. A complete timeline of Section 106 consultation is included in **Table 2, Page 19**, of the attached EA.

### **6.3 Hazardous Materials, Solid Waste, and Pollution Prevention**

In September 2020, an asbestos survey was completed for accessible areas in the hangar by a licensed Texas Department of State Health Services (TDSHS) inspector (see **Appendix D** of the attached EA). The survey detected the presence of asbestos-containing materials (ACM). Over a period of years, ACM may become friable and release fibers into the air that may serve as an environmental hazard within the study area. The Texas Asbestos Health Protection Rules require ACM be removed under the supervision of a Texas licensed Asbestos Abatement Contractor prior to the materials being disturbed during demolition.

Concurrent with the asbestos survey, a lead-based paint (LBP) survey was conducted in September 2020 (see **Appendix D** of the attached EA). A lead dust hazard was detected on structural components of the Hangar. Lead paint can be hazardous when it begins to deteriorate, which is often the case on older buildings. Because the hangar is neither categorized as “target housing” nor a “child-occupied facility”, in accordance with the revised Housing and Urban Development (HUD) Guidelines it is exempt from the Federal HUD Regulations and the Texas Environmental Lead Reduction Rules. However, the Occupational Safety and Health Administration (OSHA) suggests that any lead content identified in paint could create a hazard of lead dust exposure if paint is disturbed.

#### **6.3.1 No-Action Alternative**

Under the No Action Alternative, no hazardous materials impacts are expected to occur. However, the asbestos-containing material located in the hangar will become increasingly friable as it persists beyond the lifespan of the material, thus releasing more asbestos fibers into the air and increasing environmental hazards.

### 6.3.2 Proposed Action

Temporary impacts will occur as a result of demolition activities and include the temporary increase of petroleum fuels on-site that are utilized by equipment and trucks. Any temporary fuel tanks or the temporary storage of other regulated materials will comply with Federal, state, and local regulations.

Demolition of the entire existing hangar (20,600 SF) is required for this project and the solid waste generated from the demolition will be handled and disposed of in accordance with applicable laws and regulations. Any ACMs and LBPs would be handled and disposed of by licensed professionals in accordance with any applicable regulations as listed in **Section 6.5.3** of the attached EA.

The primary potential pollutants associated with the demolition would be sediment, building material debris, and trash entering storm sewer systems.

## 7. PUBLIC INVOLVEMENT AND AGENCY COORDINATION

As NEPA and FAA Order 1050.1F recommend for an EA, an agency, tribal, and public involvement process was conducted. This process provided the opportunity for agency, organization, and public input regarding the Proposed Project analyzed in the attached EA.

### 7.1 Agency Coordination

Coordination letters were sent to applicable local, state, and federal agencies to solicit input regarding potential environmental and cultural resources which could be impacted by the Proposed Action. The following agencies were consulted during the preparation of this EA:

- U.S. Fish and Wildlife Service (USFWS)
- Federal Emergency Management Agency (FEMA)
- Natural Resources Conservation Service (NRCS)
- Advisory Council on Historic Preservation (ACHP)
- Texas Historical Commission (THC)/ State Historic Preservation Office (SHPO)
- Texas Parks and Wildlife Department (TPWD)
- Texas Commission on Environmental Quality (TCEQ)
- Tribal Coordination

The list of tribes consulted and correspondence and comments that were received are included in **Appendix C** of the attached EA. Correspondence with the SHPO and ACHP are located in **Appendix F** of the attached EA.

### 7.2 Public Involvement

On March 28, 2023, CCIA published a public notice announcing the availability of the draft EA for review and affording an opportunity for a public meeting. The notification was posted on the CCIA website ([www.CCIA.com](http://www.CCIA.com)), the City of Corpus Christi website ([www.cc.texas.com](http://www.cc.texas.com)), and in

the Corpus Christi Caller Times, a newspaper of general circulation throughout Corpus Christi and Nueces County. The newspaper notice was published in English and Spanish. Additionally, notifications were posted on the CCIA Instagram, Facebook, and Twitter social media feeds. A copy of the notice, advertisements, and affidavit of publication are included in **Appendix G** of the attached EA.

Hardcopies of the draft EA were made available for the public to review for 45 days between March 28, 2023 and May 12, 2023 at 1201 Leopard Street, Corpus Christi, Texas 78401. The draft EA could also be reviewed online at <https://www.cctexas.com/sites/default/files/CCIA-Gault-Hangar-Draft-EA-Opportunity-for-a-Public-Meeting-Notice.pdf>. Opportunities were provided to the public to provide comments on the draft EA via letter or email. No public comments were received.

The public was given 30 days to request a public meeting. No request for a public meeting was received within 30 days which ended on April 25, 2023.

The notification was also emailed to the consulting parties, SHPO, and the U.S. Department of Interior (DOI) on March 29, 2023. During the public comment period, two consulting parties agreed to sign the MOA as concurring parties and one consulting party asked for clarification regarding a stipulation in the MOA which was addressed via email response. The SHPO provided additional comments on the MOA which were addressed prior to finalizing the MOA. The DOI provided a letter indicating no objection to Section 4(f) approval for this project.

## **8. CONDITIONS AND MITIGATION**

As prescribed by 40 CFR § 1505.3, the FAA shall take steps as appropriate to the action, such as through special conditions in grant agreements, property conveyance deeds, releases, airport layout plan approvals, and contract plans and specifications, and shall monitor these as necessary to assure that representations made in the EA and FONSI/ROD will be carried out. Specific conditions of approval associated with this project are listed below:

- The Airport, FAA, and SHPO developed a MOA that outlines stipulations to mitigate the project's effect on historic properties and will satisfactorily complete FAA's Section 106 responsibilities under the NHPA. The MOA was filed with the ACHP on June 7, 2023. The draft MOA was made available for public review with the draft EA. No public comments were received on the EA during the 45-day comment period, and one SHPO comment was received on the draft MOA. The comment was addressed. A copy of the final executed MOA is provided in **Appendix F** of the attached EA.
- The airport and the contractor shall comply with TCEQ's Texas Pollutant Discharge Elimination System Construction General Permit. A Notice of Intent will be required. A Stormwater Pollution Prevention Plan (SWPPP) will be prepared and implemented, and a construction site notice will be posted on the construction site. The SWPPP will include, among other items, identification of appropriate erosion and sediment controls and stormwater best management practices.



- The contractor shall be required to pay special attention to dust control when earthwork or hauling operations are in progress, and/or when wind or weather conditions cause excessive blowing of dust.
- Information on LBP and ACM survey conclusions will be provided to the contractor prior to any demolition activities.
  - All ACM identified will be removed under the supervision of a licensed Texas Asbestos Contractor prior to demolition.
  - In accordance with OSHA Regulation 29 CFR 1926.62(d)(1), it will be the responsibility of the contractor to develop and communicate controls to be implemented to reduce employee lead dust exposure for said company and personnel.

## 9. FINDINGS

Throughout the development of the airport, including the proposed improvements described above, the FAA has made every effort to adhere to the policies and purposes of NEPA, as stated in the NEPA implementing regulations. The FAA has concentrated on the truly significant issues related to the action in question. The FAA determined that the Proposed Action is in compliance with FAA Order 1050.1F 6-3.b(2), and is consistent with community planning as documented in the 2001 Master Plan. In its determination on whether to prepare an Environmental Impact Statement (EIS) or process the EA as a FONSI, the FAA weighed its decision based on an examination of the EA, comments from Federal and state agencies, as well as all other information available to the FAA.

As required by 40 CFR 1506.5, the FAA has independently and objectively evaluated this proposed project. As described in the Final EA, the Proposed Action and the No Action Alternative were studied extensively to determine the potential impacts and appropriate mitigation for those impacts. The FAA provided input, advice, and expertise throughout the analysis, along with administrative and legal review of the project.

The Proposed Action includes a direct use of a resource protected under Section 4(f) of the DOT Act (49 U.S.C. §303(c)). Specifically, the NRHP-eligible Gault Hangar will be demolished in order to address and eliminate safety concerns associated with the deteriorating Gault Hangar. There is no feasible and prudent alternative to retain the Gault Hanger while meeting the project purpose and need. Accordingly, FAA consulted with the SHPO pursuant to Section 106 of the NHPA and 36 C.F.R. Part 800, and a MOA for the mitigation of the unavoidable removal of the Gault Hanger was entered into by the FAA, CCIA and SHPO. All stipulations of the MOA will be implemented to mitigate the impact to the historic hangar.

Surveys taken on the Gault Hangar detected the presence of ACM and LBP. Demolition of the entire existing hangar is required for this project and the solid waste generated from the demolition will be handled and disposed of in accordance with applicable laws and regulations. Any ACMs and LBPs would be handled and disposed by licensed professionals in accordance with any applicable regulations.

The following determinations are prescribed by the statutory provisions set forth in the Airport and Airway Improvement Act of 1982, as codified in 49 U.S.C. §§ 47106 and 47107. They are preconditions of FAA's approval of airport funding applications for Airport Improvement Program (AIP) eligible airport development.

- a. 49 U.S.C. § 47106(a)(1). The Proposed Action is reasonably consistent with existing plans of public agencies for the development of the area surrounding the airport.
- b. 49 U.S.C. § 47106(b)(2). The interests of the communities in or near which the project may be located have been given fair consideration.
- c. 49 U.S.C. § 47107(a)(10). Appropriate action, including the adoption of zoning laws, has been or will be taken to the extent reasonable to restrict the use of land next to or near the airport to uses that are compatible with normal airport operations.

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed Federal action is consistent with existing national environmental policies and objectives of Section 101 of NEPA and other applicable environmental requirements and, with the required mitigation referenced above, and will not significantly affect the quality of the human environment or otherwise include any condition requiring any consultation pursuant to Section 102(2)(C) of NEPA. As a result, FAA has determined that preparation of an EIS is not necessary for this proposed action and is therefore issuing this FONSI.

RECOMMENDED  
FOR APPROVAL:

\_\_\_\_\_ Date: \_\_\_\_\_  
Kim Brockman  
Acting Manager  
Texas Airports District Office

APPROVED:

\_\_\_\_\_ Date: \_\_\_\_\_  
D. Cameron Bryan  
Acting Director, Office of Airports  
Southwest Region

## DECISION AND ORDER

East General Aviation Hangar No. 1 Demolition  
Corpus Christi International Airport  
Nueces County, Texas

June 2023

The FAA has identified the Proposed Action as the FAA's preferred alternative. FAA must now select one of the following courses of action:

- a. Approve agency actions necessary to implement the Proposed Project, or
- b. Disapprove agency actions to implement the Proposed Project.

Approval would signify that applicable Federal requirements relating to airport development and planning have been met and would permit Corpus Christi International Airport to proceed with implementation of the Proposed Action and associated mitigation measures. Not approving these agency actions would prevent the Proposed Action from being implemented.

I have carefully considered the FAA's goals and objectives in relation to the various aeronautical aspects of the Proposed Project as discussed in the EA. The review included the purpose and need that this project would serve; the alternative means of achieving the purpose and need; the environmental impacts of these alternatives; and mitigation of impacts. The review concluded that all practicable means to avoid or minimize environmental harm from the selected alternative have been adopted.

Under the authority delegated by the Administrator of the FAA, the undersigned finds that the Proposed Action, East General Aviation Hangar No. 1 Demolition, is reasonably supported. Therefore, the following agency actions, discussed more fully in the FONSI, are directed to be taken including:

1. The FAA directs that actions be taken to:
  - A. Determinations under 49 U.S.C. §§ 47106 and 47107 relating to the eligibility of the Proposed Action for federal funding under the Airport Improvement Program;
  - B. Determinations under 49 U.S.C. § 40117, as implemented by 14 CFR 158.25, to impose and use passenger facility charges (PFC) collected at the airport to assist with construction of potentially eligible items shown on the ALP; and
  - C. Unconditional approval of the portion of the ALP depicting the Proposed Action as described in Chapter 5.0 of the EA, pursuant to 49 U.S.C. §§ 40103(b) and 47107(a)(16).

The FAA has carefully and thoroughly considered the facts contained in the attached EA. Based on that information, FAA finds the proposed Federal actions are consistent with existing national environmental policies and objectives of Section 101(a) of the National Environmental Policy Act of 1969 (NEPA) and other applicable environmental requirements. The FAA also finds the proposed Federal action will not significantly affect the quality of the human environment or include any condition requiring any consultation pursuant to section 102(2)(C) of NEPA. As a result, FAA will not require an EIS for this action.

The undersigned, therefore, now approve and direct action as needed, to carry out the agency action outlined above under Proposed FAA Actions required for the East General Aviation Hangar No. 1 Demolition described under the Proposed Action in the attached EA and this FONSI/ROD. These actions are directed to be taken, and determinations and approvals are made, under the authority of 49 U.S.C. §§ 40101, 40113, 44502, 44701, 47101, 47105, 47106, 47107, 47120, and 47122.

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Rob Lowe  
Regional Administrator  
Southwest Region

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Date

### **Right of Appeal**

This order (FONSI/ROD) constitutes final agency action and final order of the Administrator under 49 U.S.C. § 46110. Any party having a substantial interest in this order may appeal this order to the United States Court of Appeals for the District of Columbia Circuit or in the Circuit Court of Appeals of the United States for the circuit in which the person resides or has its principal place of business, upon petition, filed no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110.