

Appendix F:

Section 4(f) Evaluation



Section 4(f) Statement Proposed Consolidated Terminal Program

St. Louis Lambert International Airport

St. Louis, St. Louis County, Missouri

October 2024

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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 that are listed or eligible for listing on the National Register of Historic Places (NRHP). The Secretary of Transportation may approve a transportation project requiring the use of such resources 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 Consolidated Terminal Program and other associated projects (the Proposed Action) at the St. Louis Lambert International Airport (STL or Airport) in St. Louis, St. Louis County, Missouri. The City of St. Louis (City) is the owner of the airport and 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 that would avoid the use of 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 includes the following major components and connected actions¹ as summarized in Table 1 and depicted in Figures 1, 2 and 3.

Table 1: Proposed Action

Major Project Components and Connected Actions
<p>Enabling Projects:</p> <ul style="list-style-type: none"> Demolish various structures to accommodate a new consolidated terminal, including all buildings and a tunnel which comprise the Lambert Field Historic District (former Missouri Air National Guard (MoANG) Campus), South Fire House Medical Storage, Credit Union Building, the Terminal 1 Parking Garage, Fuel Consortium Facilities (Swissport), phased demolition of existing Concourses A, B, C and D, and other support facilities as depicted in Figure 1. Construct a temporary Consolidated Receiving & Distribution Facility (CRDF), Building Maintenance Facility, and Airport Administration & Police Space.
<p>Consolidated Terminal/Airside Components:</p> <ul style="list-style-type: none"> Construct a consolidated terminal (up to 62 gates) to replace Terminals 1 and 2, as depicted in Figures 2 and 3, including: <ul style="list-style-type: none"> Reconfigure terminal passenger ticketing and baggage claim areas within the existing historic terminal dome area, Construct new consolidated security screening centered between the check-in lobby and the terminal concourse, Construct new Federal Inspection Services (FIS)/Customs accessible to all airlines, Construct new baggage claim area on lower level of the new consolidated terminal, and Relocate and upgrade utilities (electric, natural gas, telecommunications, water, sanitary and storm sewers, glycol and hydrant fueling, etc.). Construct replacement airline support facilities to accommodate Ground Support Equipment (GSE), fuel consortium services, triturator,² and other airline/airport support services. Construct Consolidated Receiving and Distribution Facility (CRDF) Construct various stormwater collection system improvements, including east deicing pad spent aircraft deicing fluid (SADF) collection infrastructure. Construct terminal apron infill around the west terminal concourse, including proposed Coldwater Creek enclosure. Reconstruct the aprons and taxilanes in the vicinity of the new consolidated terminal. Convert Taxilane C to Taxiway C. Close Terminal 2 and mothball until a potential reuse is identified.

¹ Connected actions are closely related actions that: (a) automatically trigger other actions; (b) cannot or will not proceed unless other actions are taken previously or simultaneously; or (c) are interdependent parts of a larger action and depend on the larger action for their justification (see 40 CFR § 1508.25 (a) (1), CEQ Regulations).

² An airport triturator is a specialized system used for waste disposal at airports, particularly for managing waste from aircraft lavatories.

Major Project Components and Connected Actions

On-Airport Roadway and Landside Components:

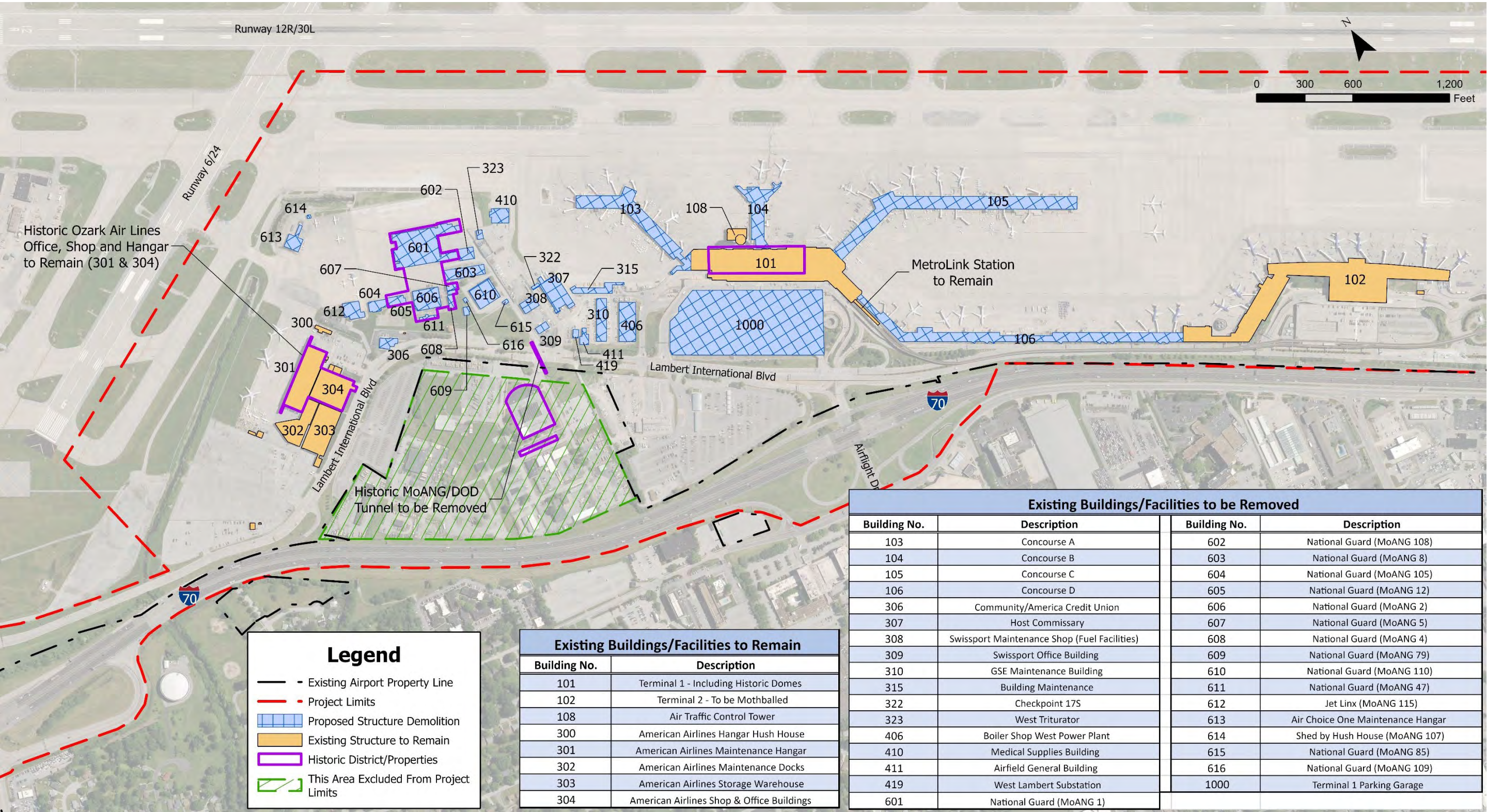
- Realign terminal roadway system with improved driver wayfinding. The Cypress/Natural Bridge Intersection will become the main access into the Consolidated Terminal.
- Construct replacement two-level passenger drop-off and pick-up curb.
- Construct Ground Transportation Center (GTC).
- Construct replacement terminal parking garage, surface parking and employee parking facilities.
- Construct Transportation Network Companies & Taxi Staging Area.

▪ **Connected Actions – Other Roadway Access Improvements:**

- Construct roadway and intersection improvements in coordination with the Federal Highway Administration (FHWA), and the Missouri Department of Transportation (MoDOT),³ including:
 - Auxiliary lane and shoulder improvements along westbound I-70 between the Airflight Drive and Natural Bridge Road interchanges,
 - Airflight Drive intersection improvements, including removing direct access from northbound Airflight to the proposed Consolidated Terminal,
 - Remove ramp from Lambert International Boulevard onto westbound I-70, and
 - Intersection improvements at the I-70 and Cypress Road/Natural Bridge Interchange, which may include widening or restriping pavement for additional turning lanes at the various ramp terminal intersections.
- Construct potential additional access improvements as identified and refined during the detailed design phase of the project.

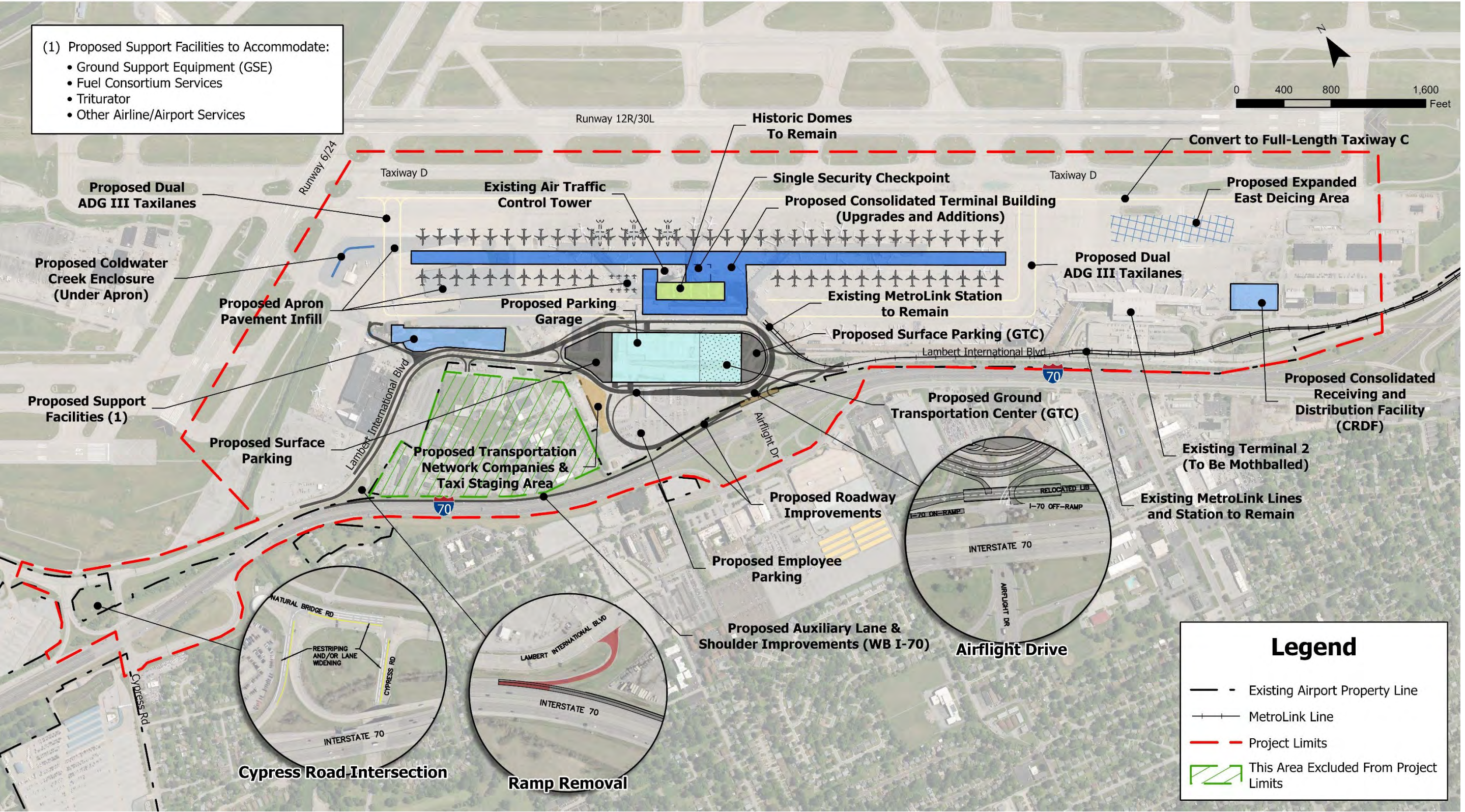
³ During the conceptual design phase of the CTP, it was determined that some off-airport roadway capacity improvements would be needed to better accommodate vehicular traffic demand that currently accesses two terminals at STL but would access a single terminal under the Proposed Action. Therefore, these proposed off-airport roadway improvements have been included as part of the Proposed Action being evaluated, and are being coordinated with MoDOT and FHWA.

Figure 1: Proposed Action – Consolidated Terminal Program (Structure Removals)

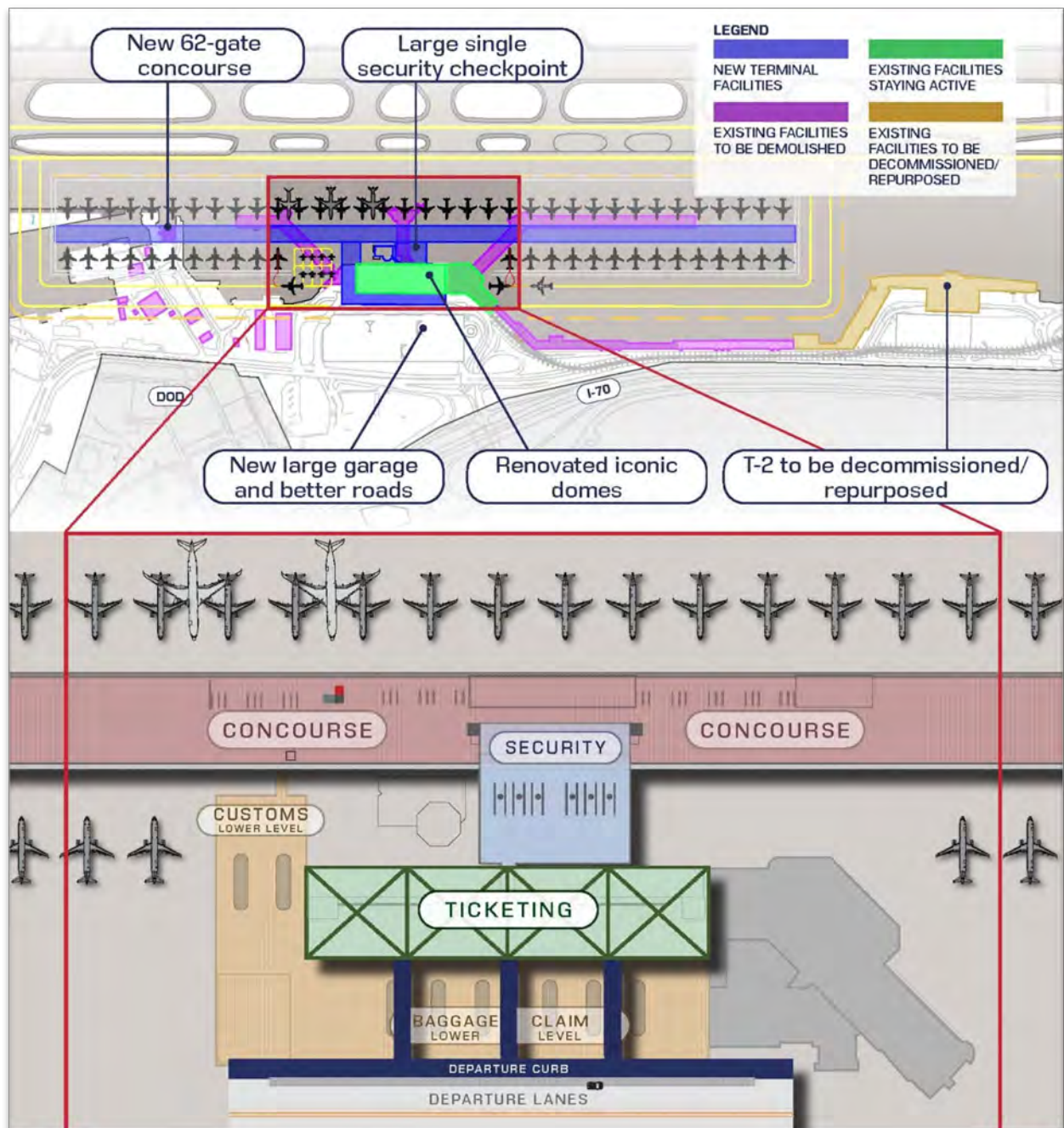


Source: CMT, 2024.

Figure 2: Proposed Action - Consolidated Terminal Program



Source: CMT, 2024.

Figure 3: Proposed Action - Consolidated Terminal Conceptual Layout

Source: WSP USA, 2024.

3 Purpose and Need

The purpose of the Proposed Action is to enhance the passenger experience; increase airport revenue; eliminate duplication of services; eliminate aging and redundant building systems; and ensure continued safe, secure, and efficient operations, by providing sufficient space and facilities for current and forecast passenger demand and aircraft operations, as well as improved access from the highway.

The need for this project is evidenced by current deficiencies within the existing terminals, roadways, and parking facilities which must be improved to enhance the passenger experience, increase airport revenue, and continue safe and efficient operations. The current Terminals 1 and 2 are undersized and congested and both terminals have functionally obsolete facilities. Both terminals provide a sub-optimum level of passenger service. The short distance between the Interstate Highway and the Terminal, the roadway geometry, intersections, and curbsides have safety and capacity deficiencies that would be made worse with the forecast increase in passengers and increased traffic.

The assessment of needed facilities (including deficiencies noted above) is based on the forecast, which was reviewed and approved by the FAA on August 21, 2020.⁴ A subsequent forecast review in 2022 documented that passenger enplanements are forecast to increase from nearly 7.9 million in 2019 to 10.1 million in 2037.^{5, 6} Commercial aircraft operations (passenger and cargo) are forecast to increase over the same period from nearly 175,000 operations to 195,000 operations. This growth is anticipated to occur with or without the Proposed Action.

⁴ Aviation Demand Forecast and Critical Design Aircraft Approval Letter, FAA, August 21, 2020.

⁵ WSP, Memorandum from John van Woensel of WSP to Jerry Beckman and Dana Ryan of St. Louis Airport Authority: STL Master Plan Aviation Demand Forecast Review and Proposed Interim Adjustments, September 30, 2022.

⁶ St. Louis Airport Authority's fiscal year ends each year on June 30th and 2022 passenger and operation numbers are actual from FY 2022.

4 Description of Section 4(f) Resources

In compliance with Section 106 of NHPA, an evaluation of properties was completed within an identified Area of Potential Effect (APE) for the Proposed Action to determine if any properties/resources are listed in or considered eligible for listing on the NRHP. The evaluation included archaeological field surveys. The evaluation identified historic resources within the APE. There were no archaeological sites identified within the APE.

Of the Section 4(f) properties identified, only one, Lambert Field Historic District (former MoANG Campus), would experience a physical use as a result of the project. The terminal building is also discussed in this section due to the potential for a Section 4(f) use. Constructive use and de minimis use of Section 4(f) properties are not anticipated.

4.1 Terminal Building

The main terminal building was constructed in 1956. The building was designed by Minoru Yamasaki with the goal of creating the most airy, open, and uncluttered space possible. Described as “*the Grand Central of the Air*”, the terminal building was crucial in starting the new Jet Age architecture used in terminal design of the time. The terminal has experienced alterations and additions since its original construction. The historic property boundary is limited to the four main terminal domes, as shown in Figures 4, 5 and 6. Later additions and the concourse are excluded from the boundary.

The Terminal Building is significant under Criterion A for its contribution to the history of the area. When constructed, the Terminal Building was one of the most advanced in the country, and the increased capacity as well as its ability to accommodate larger airliners, which spurred significant growth in the City of St. Louis. The Terminal Building is also significant under Criterion C due to its use of Jet Age architecture and significant influence of the architectural trends of other airport terminals across the country.

Figure 4: Terminal Building Historic Property Boundary



Figure 5: Terminal Building Historic Domes



The building is also considered the work of a master as Yamasaki was a prominent architect throughout the 20th century. The Terminal Building exhibits characteristics of his style.

Within the historic property boundary, the Project proposes improvements to the ticketing area to improve operational efficiency. Below, the baggage claim area would be expanded to accommodate additional baggage claim units. A new security checkpoint would be constructed between the Terminal Building and a new concourse to consolidate security in a single location. Many of these activities are in previously altered areas and/or in areas where these functions currently occur. Design details for this work are not finalized, and the Project's specific effects on the Terminal Building's other aspects of integrity are unknown.

Figure 6: Terminal Building Historic Domes (Interior)



Source: WSP USA, 2022.

No alterations of any kind are proposed for the historic domes in the Terminal Building. FAA is consulting with the Missouri State Historic Preservation Officer (SHPO) and preparing a Memorandum of Agreement (MOA) to enable a no adverse effect finding. Implementation of any measures to minimize harm stipulated in the MOA are expected to prevent any Section 4(f) use.

4.2 Lambert Field Historic District

The Lambert Field Historic District⁷ was determined eligible for the NRHP in 2016. The boundary of the historic district was described and delineated in 2012. See Figures 7 and 8. The historic district includes a total of seven buildings and a tunnel associated with the MoANG. The boundary of this district is the extent of these buildings and tunnel, and it was determined that none of the buildings or tunnel are individually eligible. The buildings within the historic district were constructed in the 1940s and 1950s, representing the increased MoANG presence at the Airport during WWII and the Cold War. The District's importance during this period makes it significant under Criterion A.

⁷ St. Louis Lambert International Airport, Consolidated Terminal Program, Section 106 Survey Report, April 2023.

Figure 7: Lambert Field Historic District Historic Property Boundary

Source: WSP USA, 2022.

The Proposed Action would demolish all of the buildings and the tunnel within the Lambert Field Historic District, resulting in an adverse effect under Section 106 of the NHPA and a Section 4(f) use of the historic property. FAA is consulting with the Missouri SHPO and preparing a MOA to fully resolve the adverse effect to this historic resource.

Figure 8: Existing MoANG Buildings (Lambert Field Historic District) to be Demolished

Source: WSP USA, 2022

5 Alternatives Analysis

5.1 Feasible 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's desk reference to FAA Order 1050.1F, Environmental Impacts: Policies and Procedures provides the FAA with guidance on how the FAA should undertake 4(f) evaluations. This guidance is based on the Federal Highway Administration / Federal Transit Administration (FHWA/FTA) regulations in 23 CFR part 774 and FHWA guidance (for example, Section 4(f) Policy Paper, 77 Federal Register 42802). 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.

5.2 Development of Alternatives

St. Louis Lambert International Airport's Master Plan reviewed fifteen terminal plans and over fifty individual terminal alternatives in five separate evaluation rounds, to define the Preferred Terminal Alternative. Factors used to evaluate alternatives included but were not limited to how well the alternative would address the needs identified, the construction period, the flexibility for future expansion potential, cost, traffic safety, avoidance of Runway Protection Zones (RPZ) and passenger experience and convenience. The options are discussed in the Airport Master Plan's Alternatives Development and Evaluation Report.⁸ The fifth and final round of the alternatives

⁸ St. Louis Lambert International Airport – Airport Master Plan Alternatives Development and Evaluation.

analysis compared a single terminal versus two terminal concepts. This fifth round distilled previous concepts down to just three alternatives that best addressed the factors considered: Alternative 5-P1 (Proposed Action), Alternative 5-P2 and Alternative 8B.

5.2.1 No Action Alternative

Under the No Action Alternative, STL would maintain its existing infrastructure and terminal configuration, and would not address the current deficiencies within the existing terminals, roadways, access from the highway and parking facilities.

Since the No Action Alternative would continue operations as they are today, this alternative would be feasible. The No Action Alternative would avoid a physical use of the Section 4(f) resource, as no changes to the existing terminals would be made and no structures within the Lambert Field Historic District would be demolished. However, the No Action Alternative would not meet the purpose of the project to provide a better customer experience for passengers and to ensure continued safe, secure, and efficient airport operations by providing space for current and potential future demand. Therefore, the No Action Alternative is feasible, but is not prudent per 23 CFR § 774.17.

5.2.2 Alternative 5-P1 (Proposed Action)

The Proposed Action as described in Chapter 2 of this Section 4(f) Statement, would be both feasible and reasonable. It would involve the demolition of buildings and the tunnel within the Lambert Field Historic District, resulting in an adverse effect under Section 106 of the NHPA and a Section 4(f) use of the historic property.



5.2.3 Alternative 5-P2

Similar to the Proposed Action, Alternative 5-P2 would provide a consolidated terminal. It would include the placement of the processor within the footprint of the existing parking garage adjacent to Terminal 1. The functionality of the existing processor under the domes would be moved to this location. This alternative would push the processor actions over the existing parking garage footprint, resulting in a narrower footprint for landside access. The area under the historic domes would be repurposed as only a pass-through concession area.



Alternative 5-P2 would be feasible and prudent. Similar to the Proposed Action, it would involve the demolition of buildings and the tunnel within the Lambert Field Historic District, resulting in an adverse effect under Section 106 of the NHPA and a Section 4(f) use of the historic property.

5.2.4 Alternative 8B

Under Alternative 8B, existing Terminal 1 and Terminal 2 would be removed to create a single terminal and processing center, including a single TSA checkpoint. Alternative 8B would include construction of three new satellite gates just east of the present Terminal 1 processing center.

Alternative 8B would involve no demolition of structures within the Lambert Field Historic District and would involve no use of any other Section 4(f) resources. The alternative is feasible. However, this alternative would require the splitting of Southwest Airlines operations over two separate satellites, which is not desirable. In addition, this alternative would require the construction of an above ground Airport People Mover (APM) which is very costly to install and maintain. Further, since an above ground APM does not provide for baggage conveyance between the terminal processor and the concourses, a tunnel would also need to be constructed for baggage conveyance, adding to the higher cost. Therefore, Alternative 8B is not prudent.

5.3 Summary of Avoidance Alternatives

The No Action Alternative and Alternative 8B both avoid the use of Section 4(f) resources. They are both feasible but are not prudent per 23 CFR § 774.17. The No Action Alternative is not prudent because it does not meet the project purpose and need. Alternative 8B is not prudent because it results in additional construction, maintenance, or operational costs of an extraordinary magnitude or results in other unique problems.

Based on the alternatives evaluation, there are no feasible and prudent alternatives that avoid a use of Section 4(f) resources.

6 Least Overall Harm Analysis

If the evaluation of avoidance alternatives concludes that there is no feasible and prudent avoidance alternative, then, from among the alternatives that would use Section 4(f) property, the FAA “*may approve only the alternative that causes the least overall harm in light of the statute’s preservation purpose*”.⁹ This analysis is required when multiple alternatives that use Section 4(f) property remain under consideration. If the assessment of overall harms finds that two or more alternatives are substantially equal, FAA can approve any of those alternatives.

To determine which of the alternatives would cause the least overall harm, seven factors set forth in 23 CFR 774.3(c)(1) must be balanced. When comparing the alternatives under these factors, comparable mitigation measures are considered. The first four factors relate to the net harm that each alternative would cause to Section 4(f) property:

1. The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property).
2. 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.
3. The relative significance of each Section 4(f) property; and
4. The views of the officials with jurisdiction over each Section 4(f) property.

The remaining three factors to be compared consider any substantial problem with any of the alternatives remaining under consideration on issues beyond Section 4(f). These factors are:

1. The degree to which each alternative meets the purpose and need for the project.
2. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
3. Substantial differences in costs among the alternatives.

By balancing the seven factors, all relevant concerns are considered to determine which alternative would cause the least overall harm, which allows FAA to fulfill its statutory mandate to make project decisions in the best overall public interest.

This Section 4(f) evaluation discloses the impacts to Section 4(f) property that would result from the alternatives under consideration. Two of the alternatives evaluated resulted in a use of a Section 4(f) historic resource, met the purpose and need and have been carried forward to the least overall harm analysis: Alternative 5-P1 (the Proposed Action) and Alternative 5-P2.

6.1 Least Overall Harm Summary

The Proposed Action Alternative has been identified as the alternative that best meets the project’s Purpose and Need, and that causes the least overall harm. The least overall harm analysis is summarized in Table 2.

⁹ 23 CFR § 774.3(c)(1); FAA 1050.1F Desk Reference, Paragraph 5.3.4.

Table 2: Least Overall Harm Summary

Criteria	Proposed Action (Alternative 5-P1)	Alternative 5-P2
The degree to which each alternative meets the Purpose and Need for the Project	Yes; would address all of the purpose and need elements of the project including enhancing the passenger experience to a greater degree than Alternative 5-P2 by retaining existing parking facilities and improving passenger mobility and access to concessions and services and maximizing Airport revenue.	Yes; however, it would reduce passenger mobility and access to concessions and services due to the narrower footprint for landside access and could limit the Airport revenue potential. Therefore, Alternative 5-P2 meets the project purpose and need to a lesser degree than the Proposed Action Alternative.
Ability to Mitigate adverse impacts to each Section 4(f) property	Yes, mitigation through the implementation of a MOA would be completed.	Yes, mitigation through the implementation of a MOA would be completed.
Relative severity of the remaining harm, after mitigation, to protected activities, attributes, or features that qualify each Section 4(f) property for protection	Equal; an adverse effect would result due to the demolition of Section 4(f) resources	Equal; an adverse effect would result due to the demolition of Section 4(f) resources
Relative significance of each Section 4(f) property	Equal; the same Section 4(f) resources would be impacted	Equal; the same Section 4(f) resources would be impacted
Views of the official(s) with jurisdiction over each Section 4(f) property	Equal, acknowledged the adverse effect due to the demolition of Section 4(f) resources	Equal, acknowledged the adverse effect due to the demolition of Section 4(f) resources
After reasonable mitigation, the magnitude of any remaining adverse impacts to resources not protected by Section 4(f)	Equal	Equal
Substantial differences in costs among the alternatives	Equal (Approx. \$1.7B in 2021 Dollars)	Equal (Approx. \$1.7B in 2021 Dollars)
Alternative with the least overall harm?	Yes; Although the Section 4(f) Resource would be demolished; this alternative best meets the Purpose and Need by fully satisfying all design requirements.	No; Although the same Section 4(f) Resource would be demolished; this alternative would meet the Purpose and Need to a lesser degree than the Proposed Action.

The Proposed Action is determined to cause the least overall harm based on the seven factors above. The Proposed Action best meets the project purpose and need because it improves the passenger experience and the revenue potential for the Airport beyond that provided under Alternative 5-P2.

7 Mitigation

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 adverse impacts must be included in the project.

A Memorandum of Agreement (MOA) that outlines the steps needed to mitigate the Adverse Effect for this project was prepared. Stipulations in the MOA were developed in consultation with the Federal Aviation Administration (FAA), the Missouri State Historic Preservation Officer (SHPO), and the Osage Nation Historic Preservation Office (ONHPO).

7.1 Design Measures that Minimize Use of Section 4(f) Property

Measures to minimize harm to the identified Section 4(f) property were identified through Section 106 consultation as described in the next section. Therefore, the Proposed Action has incorporated all possible planning to minimize harm to Section 4(f) property.

7.2 Mitigation Measures

Mitigation measures, as summarized below, were identified through the Section 106 consultation process, which included SHPO and ONHPO and will be incorporated in the project:

7.2.1 Photographic Record

A photographic record (photographs & drone video) of the Lambert Field Historic District will be completed in accordance with National Register Photo Policy Standards for archival purposes. Photographs and video shall provide an accurate visual representation of the property and its significant features. They must illustrate the qualities discussed in the description and NRHP statement of significance.

7.2.2 Physical Display

A permanent display will be created as part of the Consolidated Terminal Program that will illustrate the military history of the airport and the buildings comprising the Lambert Field Historic District including any salvaged items, original photos and plans, or other appropriate information.

7.2.3 Website

A webpage will be created within the St. Louis Lambert International Airport website that provides information, photos, cultural resource reports, NRHP listings, etc. relating to the military history at the Airport and the Lambert Field Historic District.

7.2.4 Design Review

In order to avoid an adverse effect on the Terminal Building, project plans will be provided to the Missouri SHPO for review and comment. All improvements to the Terminal Building will follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties* in order to avoid diminishing the historic integrity of the building while also considering accessibility, operational, security, economic, and technical feasibility.

7.2.5 Archeological Monitoring

Although no archaeological sites were identified within the APE, as a precaution and in consultation with The Osage Nation, the Airport will provide archaeological monitoring for all

ground-disturbing construction activities within the APE provided by a Project Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards (36 C.F.R. Part 61).

8 Coordination with Agencies having Jurisdiction

As a part of the Section 4(f) requirements, the FAA is responsible for soliciting and considering the comments of the Department of Interior (DOI) 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 over the identified Section 4(f) resource. In addition, because the Section 4(f) resource includes buildings owned and operated by the City of St. Louis, HUD should have no interest in this Section 4(f) resource.

Because the resources that would be used under Section 4(f) are historic properties, the Missouri SHPO is the official with jurisdiction for these resources. The following provides a summary of the coordination to date.

- Initiated the Section 106 consultation with the Missouri SHPO in December 2022 and identified tribes and other potential consulting parties.
- FAA provided the Cultural Resources Survey Report with eligibility determinations and an adverse effect finding in March 2023.
- In August 2023, Missouri SHPO concurred with the adverse effect finding and requested the preparation of an MOA to address the adverse effect on the Lambert Field Historic District and to prevent an adverse effect on the Main Terminal building historic domes.
- In August 2023 upon Missouri SHPO concurrence, FAA notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect finding and asked if they wanted to participate in the development of an MOA to address the adverse effect.
- ACHP responded in August 2023 declining the invitation to consult and requesting the final Section 106 agreement document, developed in consultation with the Missouri SHPO and any other consulting parties, at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the NHPA.
- The Osage Nation requested to be an invited signatory to the MOA, with included monitoring stipulations in January 2024.
- In February 2024, FAA notified the Missouri SHPO of a revised project APE, and no change to the finding of an adverse effect.
- The Missouri SHPO concurred with the revised APE and adverse effect finding in April 2024.
- Draft Section 4(f) Statement and Draft MOA provided for public review and comment July 3, 2024 through August 16, 2024. No comments were received.
- SHPO executed the MOA on August 27, 2024.

9 Section 4(f) Statement Conclusion

There are no alternatives that meet the purpose and need, are both prudent and feasible, and completely avoid the use of Section 4(f) resources. The Proposed Action has been identified as the alternative that causes the least overall harm. The FAA is consulting with the Airport, the Osage Nation, and the Missouri SHPO to develop an MOA under Section 106 of the NHPA. The MOA stipulates the mitigation measures required to address and fully resolve the adverse effects of the Proposed Action on historic properties.

The mitigation measures are a requirement of the Proposed Action and would address the Section 4(f) requirement that the project minimize adverse impacts when there is a use of a Section 4(f) resource. FAA has determined that there is not a feasible and prudent alternative to the use of Section 4(f) resources, and the Proposed Action includes all possible planning to minimize harm to the Section 4(f) resources resulting from the use. The Draft Section 4(f) Statement and Draft MOA were provided for public review and comment July 3, 2024 through August 16, 2024. No comments were received.

ABBREVIATIONS	
ACHP	Advisory Council on Historic Preservation
APM	Airport People Mover
CTP	Consolidated Terminal Program
DOD	Department of Defense
EA	Environmental Assessment
FAA	Federal Aviation Administration
STL	St. Louis Lambert International Airport
NEPA	National Environmental Policy Act
NRHP	National Register of Historic Places
MOA	Memorandum of Agreement
OWJ	Official with Jurisdiction
SHPO	State Historic Preservation Officer
THPO	Tribal Historic Preservation Officer

Department of Interior Comments on 4(f) Evaluation



United States Department of the Interior

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In reply refer to:
ER 240245

June 25, 2024

Scott Tener
FAA Central Region Airports Division
901 Locust Street; Room 364
Kansas City, MO 64106

Subject: Draft Section 4(f) Evaluation for the proposed Consolidated Terminal Program at the St. Louis Lambert International Airport (airport) in St. Louis, St. Louis County, Missouri

Dear Scott Tener,

The Department of the Interior (Department) has reviewed the Draft Section 4(f) Evaluation for the proposed Consolidated Terminal Program at the St. Louis Lambert International Airport (airport) in St. Louis, St. Louis County, Missouri. The Federal Aviation Administration (FAA) is the lead federal agency for this project's Section 4(f) evaluation. The National Park Service (NPS) has provided the following comments.

Section 4(f) Properties

The draft Section 4(f) evaluation considers effects under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303) associated with the project. Section 4(f) applies to publicly owned parks, recreation areas, wildlife and waterfowl refuges, or significant historic resources. The draft evaluation assesses that the terminal building and Lambert Field Historic District (district) are located within the area of potential effects and subject to protection under Section 4(f). No parks, recreation areas, or wildlife and waterfowl refuges occur within the project area.

Terminal Building

The main terminal building was constructed in 1956 and was designed by Minoru Yamasaki, who was a prominent architect throughout the 20th century. Described as "the Grand Central of the Air," the terminal building was crucial in starting new Jet Age architecture, which significantly influenced terminal design at the time. Along with its contribution to the history of

Scott Tener

the area, the four main terminal domes are included within the historic property boundary. Under the Preferred Alternative no alterations of any kind are proposed for the historic domes in the terminal building.

Lambert Field Historic District

The Lambert Field Historic District was determined eligible for the National Register of Historic Places in 2016. A total of seven buildings and a tunnel associated with the Missouri Air National Guard (MoANG) Campus are collectively part of the historic district. However, it was determined that none of the buildings or tunnel are individually eligible. The buildings within the historic district were constructed in the 1940s and 1950s, representing the increased MoANG presence at the airport during World War II and the Cold War. The Preferred Alternative would demolish all of the buildings and the tunnel within the Lambert Field Historic District, resulting in an adverse effect under Section 106 of the National Historic Preservation Act and a Section 4(f) use of the historic property.

Alternatives

The FAA considered two avoidance alternatives including a no build alternative. The no build alternative was found feasible but not prudent because it did not meet the purpose and need. The avoidance alternative was found feasible but not prudent because it would result in additional construction, maintenance, or operational costs of an extraordinary magnitude or other unique problems.

The FAA considered two use alternatives, the alternative 5-P1 (preferred alternative) and alternative 5-P2, which were found feasible and prudent and met the purpose and need. Both are carried forward for the least overall harm analysis.

Assessment of Effect and Proposed Mitigations

The FAA determined that both the preferred alternative and alternative 5-P2 would result in an adverse effect to historic properties under Section 106 of the NHPA. There are no alternatives that completely avoid Section 4(f) resources that are both prudent and feasible.

Terminal Building

No changes would be made to the four main terminal domes included within the historic property boundary under either alternative, therefore, no adverse effect would occur, and no mitigation is required.

Lambert Field Historic District

Both alternatives would result in an equal, adverse effect to the Lambert Field Historic District as a result of demolishing the seven buildings and tunnel comprising the MoANG Campus. The preferred alternative is determined to cause the least overall harm, because it best meets the purpose and need and improves passenger experience and revenue potential for the airport beyond that provided under Alternative 5-P2.

Scott Tener

The FAA is consulting with the airport and the Missouri State Historic Preservation Officer (SHPO) to develop a Memorandum of Agreement (MOA), which will stipulate mitigation measures for the adverse effect.

The MOA outlines the following measures to mitigate the adverse effect to the Lambert Field Historic District:

1. A photographic record (e.g., photographs and drone video) of the district will be completed in accordance with National Register Photo Policy (NRHP) Standards for archival purposes. Photographs and video shall provide an accurate visual representation of the property and its significant features. They must illustrate the qualities discussed in the description and NRHP statement of significance.
2. A permanent display will be created as part of the Consolidated Terminal Program that will illustrate the military history of the airport and the buildings comprising the district including any salvaged items, original photos and plans, or other appropriate information.
3. A webpage will be created within the St. Louis Lambert International Airport website that provides information, photos, cultural resource reports, NRHP listings, etc. relating to the military history at the airport and the district.
4. To avoid an adverse effect on the terminal building, project plans will be provided to the Missouri SHPO for review and comment. All improvements to the terminal building will follow the Secretary of the Interior's Standards for the Treatment of Historic Properties to avoid diminishing the historic integrity of the building while also considering accessibility, operational, security, economic, and technical feasibility.
5. Although no archaeological sites were identified within the APE, as a precaution and in consultation with The Osage Nation, the airport will provide archaeological monitoring by a project archaeologist for all ground-disturbing construction activities within the APE meeting the Secretary of the Interior's Professional Qualifications Standards (36 C.F.R. Part 61).

Section 4(f) Comments

The building, designed in 1955 by Japanese American architect, Minoru Yamasaki, will be spared from demolitions, but its setting will be substantially changed by new construction. A MOA is being prepared to identify measures to mitigate adverse impacts this project will have on historic resources. The Department recommends that historic resources should be documented for the Historic American Buildings Survey (HABS), with final documentation submitted through the National Park Service to the Library of Congress for inclusion in the HABS Collection. This would include those resources that will be demolished, as well as the main terminal building. The National Park Service (NPS) concurs with this determination.

The Department concurs with the FAA's determination. Based on the information provided by the FAA in the Draft Section 4(f) Evaluation, the Department also concurs with the FAA's determination that there is no feasible and prudent avoidance alternative to the Section 4(f)

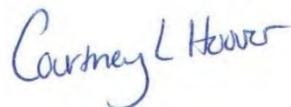
Scott Tener

demolition of this historic property. The Department recommends that consultation continue with all Section 106 consulting parties pursuant to 36 CFR § 800.6 and that the project not proceed until an MOA to mitigate adverse effects is executed that is satisfactory to all parties.

For issues concerning Section 4(f) resources, please contact Hanna Daly, Regional Environmental Coordinator Regions 3, 4, and 5, NPS, hanna_daly@nps.gov. We appreciate the opportunity to provide these comments.

If you have any questions for the Department, please contact me at (303) 478-3373, or courtney_hoover@ios.doi.gov.

Sincerely,

A handwritten signature in blue ink that reads "Courtney Hoover". The signature is written in a cursive, flowing style.

Courtney Hoover
Regional Environmental Officer
Office of Environmental Policy and Compliance

From: [Daly, Hanna G](#)
To: [Tener, Scott \(FAA\)](#)
Cc: [Hoover, Courtney L](#)
Subject: Re: [EXTERNAL] FW: Department of the Interior - 4(f) Comments: Terminal Project at St. Louis Lambert International Airport, Missouri
Date: Thursday, June 27, 2024 4:22:45 PM

CAUTION: This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Scott,

Thank you for reaching out. The recommendation provided by the NPS is the best professional judgment of the historic preservation manager. However, if the SHPO is comfortable with the MOA as is, the HABS documentation is not required. Let me know if I can help with anything else.

Hanna

Hanna Daly (she/her/hers)
Regional Environmental Coordinator
National Park Service, DOI Regions 3, 4, and 5
Teams or hanna_daly@nps.gov
402-830-8673

From: Tener, Scott (FAA) <scott.tener@faa.gov>
Sent: Wednesday, June 26, 2024 2:53 PM
To: Daly, Hanna G <hanna_daly@nps.gov>
Cc: Hoover, Courtney L <courtney_hoover@ios.doi.gov>
Subject: [EXTERNAL] FW: Department of the Interior - 4(f) Comments: Terminal Project at St. Louis Lambert International Airport, Missouri

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

Hanna,

I wanted to reach out to you regarding NPS' comment concerning HABS documentation for the historic resources at the St. Louis Lambert International Airport. NPS recommends that historic resources should be documented for the Historic American Buildings Survey (HABS), with final documentation submitted through the National Park Service to the Library of Congress for inclusion in the HABS Collection. This would include those resources that will be demolished, as well as the main terminal building.

After discussing the comment with the Missouri SHPO for possible inclusion in the MOA, the SHPO believes that HABS documentation does not seem to be warranted. They believe that HABS documentation is not particularly well suited to providing an understanding of the setting that will be lost. Therefore, the SHPO does not feel the need to revise the MOA to include a requirement for HABS documentation of the Air National Guard Facility to be demolished or of the Main Terminal which is to remain.

We note in DOI's response that the comment is recommended and wanted to see if you would have any objection if we did not include the HABS documentation into the project mitigation.

Please let me know if you have any questions,

Scott Tener
Environmental Program Manager

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
<http://www.faa.gov/airports/central/>

From: Hoover, Courtney L <courtney_hoover@ios.doi.gov>

Sent: Tuesday, June 25, 2024 7:27 AM

To: Tener, Scott (FAA) <scott.tener@faa.gov>

Cc: Skaar, Karen S <karen_skaar@ios.doi.gov>

Subject: Department of the Interior - 4(f) Comments

CAUTION: This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

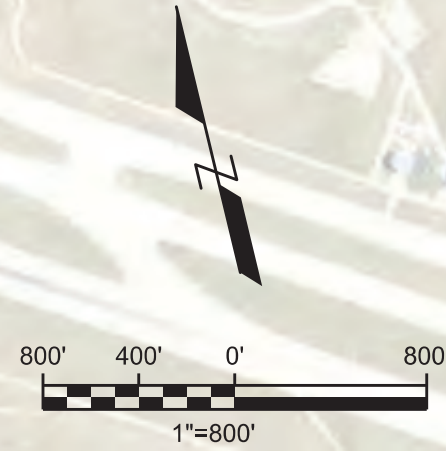
Hello Scott, please see the attachment for DOI's comment letter.

Please reach out if you have any questions or needs.

Courtney Hoover
Regional Environmental Officer, Denver
Office of Environmental Policy and Compliance
Department of the Interior Regions 5 (Missouri Basin) and 7 (Upper Colorado Basin)

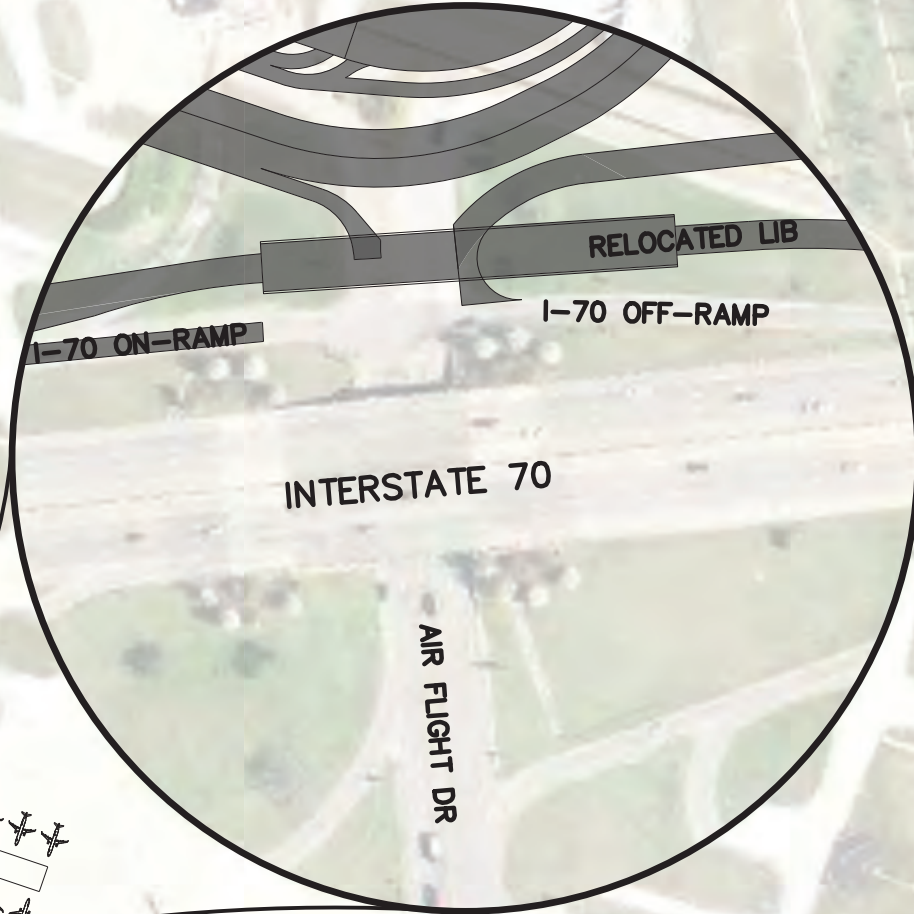
303-478-3373 (Cell)
Denver Federal Center, Building 46
P.O. Box 25207
Denver, CO 80225

APPENDIX F

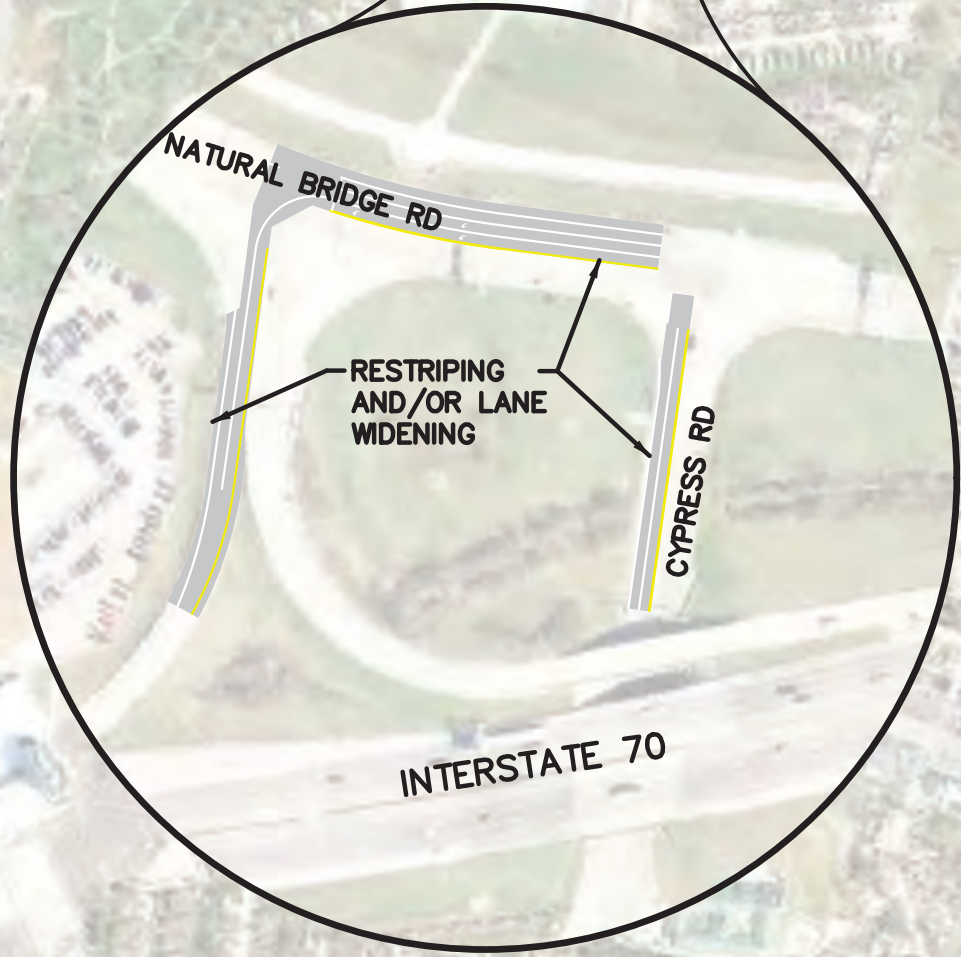


STUDY AREA

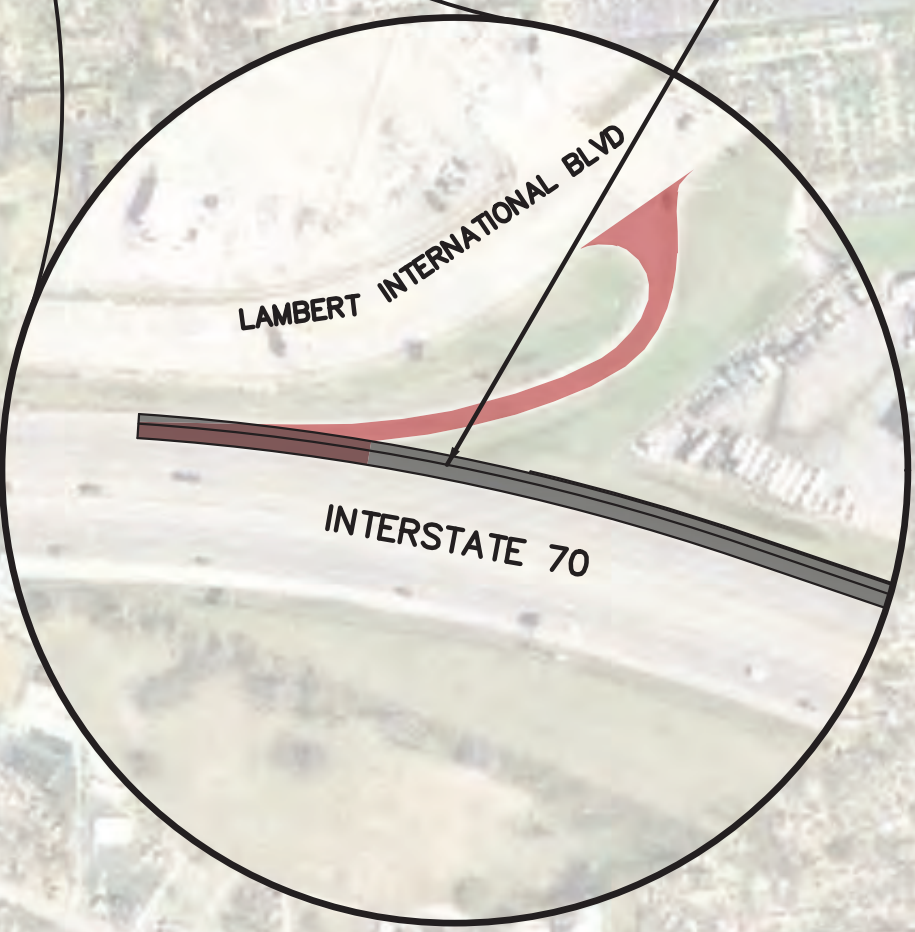
NEW AIRPORT TERMINAL
NEW GARAGE
NEW ACCESS ROADS



AIRFLIGHT DR



CYPRESS INTERSECTION



RAMP REMOVAL

AUXILIARY LANE FROM
AIR FLIGHT DR TO CYPRESS EXIT

I-70 AIRPORT STUDY AREA

INTERSTATE 170

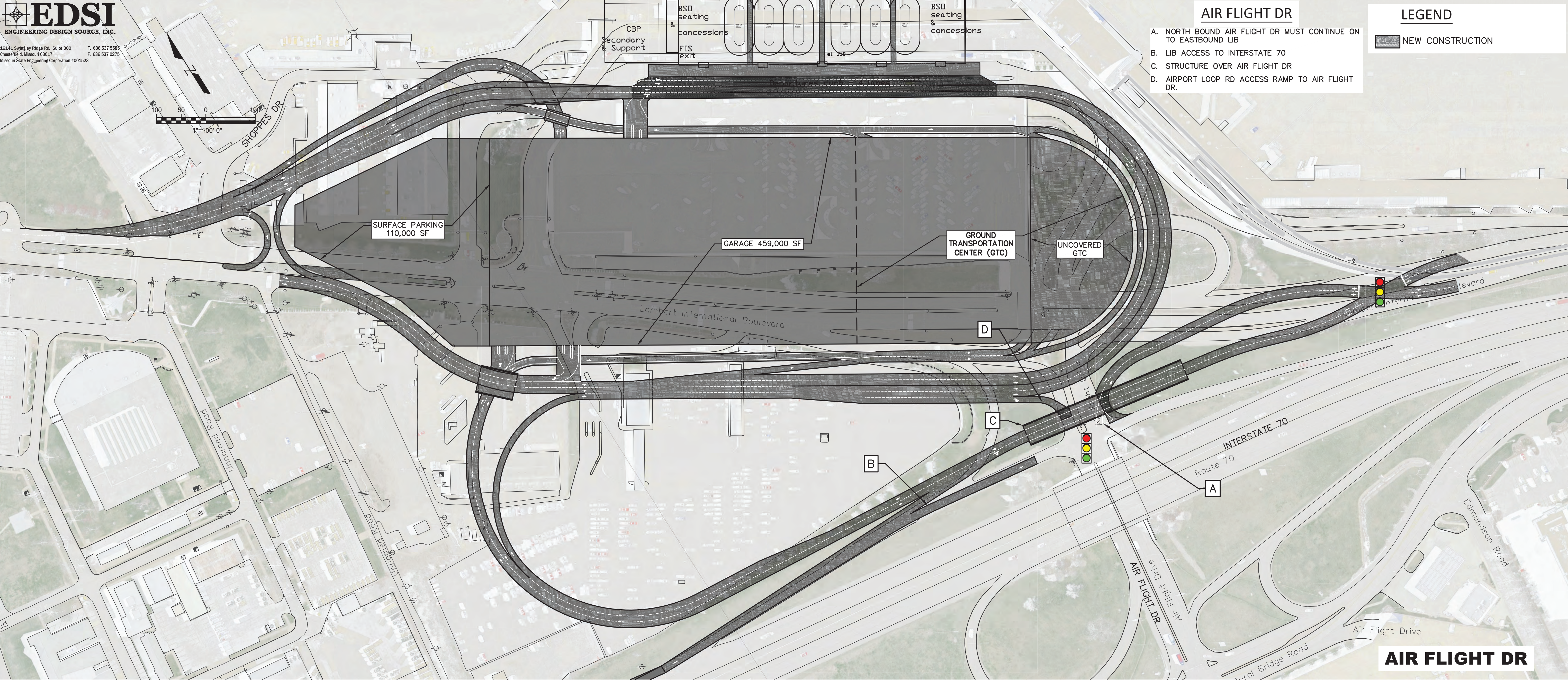
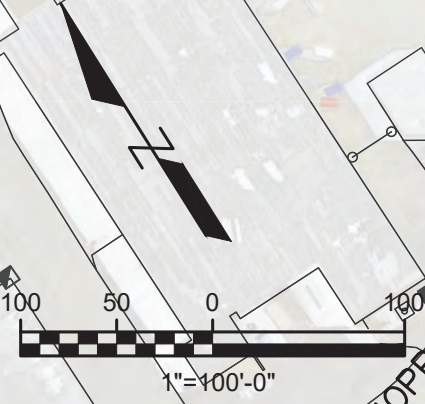
INTERSTATE 70

MO 180

MO 67

INTERSTATE 70

MO 115



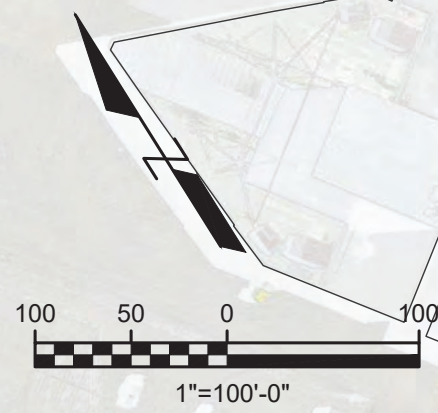
AIR FLIGHT DR

- A. NORTH BOUND AIR FLIGHT DR MUST CONTINUE ON TO EASTBOUND LIB
- B. LIB ACCESS TO INTERSTATE 70
- C. STRUCTURE OVER AIR FLIGHT DR
- D. AIRPORT LOOP RD ACCESS RAMP TO AIR FLIGHT DR.

LEGEND

NEW CONSTRUCTION

AIR FLIGHT DR

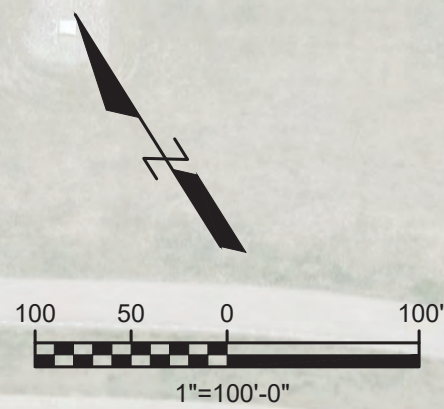


AUXILIARY LANE NOTES

- A. REMOVE RAMP TO I-70.
- B. RELOCATE OVERHEAD CANTILEVER TRUSS.
- C. 1700' LOW BARRIER WALL / MSE WALL FOR SLOPE RETENTION WITH DRAINAGE GUTTER.

LEGEND





- EXISTING TO BE DEMOLISHED
- DEMOLISHED IN PREVIOUS STAGE
- NEW CONSTRUCTION
- CONSTRUCTED IN PREVIOUS STAGE



CYPRESS IMPROVEMENT NOTES

- A. RECONFIGURE NATURAL BRIDGE RD FOR DUAL LEFT TURN LANES.
- B. RECONFIGURE SOUTHBOUND CYPRESS FOR TWO LANES.
- C. RECONFIGURE THE WESTBOUND I-70 ON RAMP TO TWO RECEIVING LANES.

LEGEND

-  EXISTING TO BE DEMOLISHED
-  DEMOLISHED IN PREVIOUS STAGE
-  NEW CONSTRUCTION
-  CONSTRUCTED IN PREVIOUS STAGE

