

ATTACHMENT A
Documentation in Support of CatEx



Attachment A: Documentation in Support of CatEx

Construct New Terminal Building
Middlebury State Airport (6B0)

January 2026

Documentation in Support of CatEx

Construct New Terminal Building

**Middlebury State Airport
Middlebury, Vermont**

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION**

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

January 2026

After careful and thorough consideration of the facts contained herein, the undersigned finds that the proposed federal action is consistent with existing national policies and objectives as set forth in Section 101 of the National Environmental Policy Act (NEPA) and other applicable environmental requirements and will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 101 (2) (c) of the NEPA. This environmental assessment becomes a federal document when evaluated, signed, and dated by the responsible Federal Aviation Administration (FAA) official.

Responsible FAA Official

Date

TABLE OF CONTENTS

1.0	INTRODUCTION	2
1.1	Background	3
1.2	Airport Overview	3
1.3	Sponsor's Proposed Action	3
1.4	Federal Actions	4
1.5	Timeframe of the Sponsor's Proposed Action	4
2.0	PURPOSE & NEED	5
2.1	Purpose	5
2.2	Need	5
3.0	ALTERNATIVES	7
3.1	Alternative 1: No Action Alternative	7
3.2	Alternative 2: Construct Terminal Building – Central Location	7
3.3	Alternative 3: Construct Terminal Building – North Location	8
3.4	Alternatives Considered and Dismissed	8
3.5	Sponsor's Proposed Action	9
4.0	AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES	11
4.1	Study Area	12
4.1.1	Detailed Study Area	12
4.1.2	Generalized Study Area	12
4.2	Environmental Resource Categories Not Affected	12
4.2.1.1	Coastal Resources	12
4.2.1.2	Water Resources (Floodplains)	13
4.2.1.3	Water Resources (Wild & Scenic Rivers)	13
4.3	Air Quality	13
4.3.1	Regulatory Context	13
4.3.2	Affected Environment	14
4.3.3	Environmental Consequences	14
4.3.3.1	Significance Threshold	15
4.3.3.2	Alternative 1: No Action Alternative	15
4.3.3.3	Alternative 2: Construct Terminal Building – Central Location ..	15
4.4	Biological Resources	16
4.4.1	Regulatory Context	16
4.4.2	Affected Environment	16
4.4.2.1	Federally Protected Species	16
4.4.2.2	Migratory Birds	17
4.4.2.3	State Protected Species	18
4.4.2.4	Invasive Species	18
4.4.3	Environmental Consequences	18
4.4.3.1	Significance Threshold	18
4.4.3.2	Alternative 1: No Action Alternative	19
4.4.3.3	Alternative 2: Construct Terminal Building – Central Location ..	19
4.5	Climate	20
4.5.1	Affected Environment	20
4.5.2	Environmental Consequences	20
4.5.2.1	Significance Threshold	20
4.5.2.2	Alternative 1: No Action Alternative	20
4.5.2.3	Alternative 2: Construct Terminal Building – Central Location ..	21

Table of Contents

4.6	Historical, Architectural, Archaeological, and Cultural Resources	21
4.6.1	Regulatory Context.....	21
4.6.2	Affected Environment	21
4.6.2.1	Area of Potential Effect.....	21
4.6.2.2	Archeological Resources.....	22
4.6.2.3	Historic Resources	22
4.6.3	Environmental Consequences.....	23
4.6.3.1	Significance Threshold	23
4.6.3.2	Alternative 1: No Action Alternative	23
4.6.3.3	Alternative 2: Construct Terminal Building – Central Location ..	23
4.7	Department of Transportation Act, Section 4(f) Resources	23
4.7.1	Regulatory Context.....	23
4.7.2	Affected Environment	24
4.7.2.1	Public Parks & Recreation Areas	24
4.7.2.2	Historic Sites	24
4.7.3	Environmental Consequences.....	24
4.7.3.1	Significance Threshold	24
4.7.3.2	Alternative 1: No Action Alternative	24
4.7.3.3	Alternative 2: Construct Terminal Building – Central Location ..	24
4.8	Section 6(f) Resources.....	25
4.8.1	Regulatory Context.....	25
4.8.2	Affected Environment	25
4.8.3	Environmental Consequences.....	25
4.8.3.1	Significance Threshold	25
4.8.3.2	Alternative 1: No Action Alternative	25
4.8.3.3	Alternative 2: Construct Terminal Building – Central Location ..	25
4.9	Farmlands.....	25
4.9.1	Regulatory Context.....	25
4.9.2	Affected Environment	25
4.9.3	Environmental Consequences.....	26
4.9.3.1	Significance Threshold	26
4.9.3.2	Alternative 1: No Action Alternative	26
4.9.3.3	Alternative 2: Construct Terminal Building – Central Location ..	26
4.10	Hazardous Materials, Solid Waste, & Pollution Prevention.....	26
4.10.1	Regulatory Context.....	26
4.10.2	Affected Environment	27
4.10.3	Environmental Consequences.....	28
4.10.3.1	Significance Threshold	28
4.10.3.2	Alternative 1: No Action Alternative	28
4.10.3.3	Alternative 2: Construct Terminal Building – Central Location ..	28
4.11	Land Use	29
4.11.1	Regulatory Context.....	29
4.11.2	Affected Environment	29
4.11.3	Environmental Consequences.....	29
4.11.3.1	Significance Threshold	29
4.11.3.2	Alternative 1: No Action Alternative	30
4.11.3.3	Alternative 2: Construct Terminal Building – Central Location ..	30
4.12	Natural Resources & Energy Supply	30
4.12.1	Regulatory Context.....	30
4.12.2	Affected Environment	30
4.12.3	Environmental Consequences.....	30

Table of Contents

4.12.3.1	Significance Threshold	30
4.12.3.2	Alternative 1: No Action Alternative	30
4.12.3.3	Alternative 2: Construct Terminal Building – Central Location ..	31
4.13	Noise & Land Use Compatibility	31
4.13.1	Regulatory Context.....	31
4.13.2	Affected Environment	31
4.13.3	Environmental Consequences.....	32
4.13.3.1	Significance Threshold	32
4.13.3.2	Alternative 1: No Action Alternative	32
4.13.3.3	Alternative 2: Construct Terminal Building – Central Location ..	32
4.14	Socioeconomics & Children’s Health and Safety	33
4.14.1	Regulatory Context.....	33
4.14.2	Affected Environment	34
4.14.3	Socioeconomics	34
4.14.4	Children’s Environmental Health & Safety Risk	34
4.14.5	Environmental Consequences.....	34
4.14.5.1	Significance Threshold	34
4.14.5.2	Alternative 1: No Action Alternative	34
4.14.5.3	Alternative 2: Construct Terminal Building – Central Location ..	35
4.15	Visual Effects	35
4.15.1	Regulatory Context.....	35
4.15.2	Affected Environment	35
4.15.3	Light Emissions	35
4.15.4	Visual Resources and Character	35
4.15.5	Environmental Consequences.....	36
4.15.5.1	Significance Threshold	36
4.15.5.2	Alternative 1: No Action Alternative	36
4.15.5.3	Alternative 2: Construct Terminal Building – Central Location ..	36
4.16	Water Resources	37
4.16.1	Regulatory Context.....	37
4.16.2	Affected Environment	37
4.16.2.1	Wetlands	37
4.16.2.2	Surface Waters	38
4.16.2.3	Groundwater	38
4.16.3	Environmental Consequences.....	38
4.16.3.1	Significance Threshold	38
4.16.3.2	Alternative 1: No Action Alternative	38
4.16.3.3	Alternative 2: Construct Terminal Building – Central Location ..	38
4.17	Summary of Consequences	39
4.18	Cumulative Impacts	40
4.18.1	Past, Present, and Reasonably Foreseeable Projects	40
4.18.2	Potential Cumulative Impacts	40
5.0	PUBLIC OUTREACH	42
5.1	Early Agency Coordination.....	42
5.2	Public Meeting	42
6.0	LIST OF PREPARERS	43

LIST OF TABLES

Table 3-1.	Preliminary Alternatives Screening.....	9
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Table of Contents

Table 4-1.	National Ambient Air Quality Standards	14
Table 4-2.	Farmland Soils within the Direct Study Area	26
Table 4-3.	Noise Levels of Typical Construction Equipment.....	32
Table 4-4.	Common Noise Levels.....	33
Table 4-5.	U.S. Census Bureau Statistics	34
Table 4-6.	Summary of Key Issues	39
Table 6-1.	List of Preparers.....	43

LIST OF FIGURES

Figure 1-1:	Middlebury State Airport Location
Figure 1-2:	Airport Facilities Map
Figure 1-3:	Sponsor's Proposed Action
Figure 3-1.	Central and North Alternative Location
Figure 3-2:	Alternative 2: Construct Terminal Building – Central Location
Figure 3-3:	Alternative 3: Construct Terminal Building – North Location
Figure 3-4:	Terminal Building Rendering
Figure 4-1:	Direct Study Area
Figure 4-2:	Generalized Study Area
Figure 4-3:	Act 59 Resources
Figure 4-4:	Historic & Cultural Resources
Figure 4-5:	Green Mountain National Forest
Figure 4-6:	Farmland Soils
Figure 4-7:	Surface Water Resources

LIST OF APPENDICES

- APPENDIX A:** Field Memorandum
- APPENDIX B:** Section 106 Consultation
- APPENDIX C:** Agency coordination
- APPENDIX D:** Public Involvement

Table of Contents

LIST OF ACRONYMS & ABBREVIATIONS

µg/m ³	Micrograms per Cubic Meter
6B0	Middlebury State Airport
ACS	American Community Survey
AEDT	Aviation Environmental Design Tool
ALP	Airport Layout Plan
ANR	Vermont Agency of Natural Resources
APE	Area of Potential Effect
BMPs	Best Management Practices
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CH ₄	Methane
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CWA	Clean Water Act
CZMP	Coastal Zone Management Program
dB	Decibel
dbh	Diameter at Breast Height
DNL	Day Night Average Sound Level
DOT	U.S. Department of Transportation
DSA	Detailed Study Area
EA	Environmental Assessment
ECHO	Enforcement and Compliance History Online
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act of 1973
EV	Electric Vehicle
FAA	Federal Aviation Administration
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GHG	Greenhouse Gas
GIS	Geographic Information Systems
GSA	Generalized Study Area
HFCs	Hydrofluorocarbons
IPaC	Information for Planning and Consultation
LTO	Landing and Take-off Cycle
LWCF	Land and Water Conservation Fund
MOVES	Motor Vehicle Emission Simulator
N ₂ O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NLEB	Northern Long-eared Bat
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPIAS	National Plan of Integrated Airport Systems
NPL	National Priorities List

Table of Contents

NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
O ₃	Ozone
OTR	Ozone Transport Region
Pb	Lead
PFC	Perfluorocarbons
PM	Particulate Matter
ppb	Parts Per Billion
ppm	Parts Per Million
RCRA	Resource Conservation and Recovery Act
SF ₆	Sulfur Hexafluoride
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
Sq. ft.	Square Foot
SSA	Sole Source Aquifer
SWPPP	Stormwater Pollution Prevention Plan
USC	United States Code
USFWS	U.S. Fish & Wildlife Service
UST	Underground Storage Tank
VDEC	Vermont Department of Conservation
VDHP	Vermont Division of Historic Preservation
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VSASP	Vermont State Aviation System Plan
VTrans	Vermont Agency of Transportation
WOTUS	Waters of the U.S.

1.0 INTRODUCTION

The Vermont Agency of Transportation (VTrans) has prepared this Environmental Assessment (EA) for the proposed construction of a new terminal building at Middlebury State Airport (6B0) in Middlebury, Vermont. The Proposed Action includes the development of an approximately 1,800 square foot (sq. ft.) single-story terminal building to serve existing light general aviation activity. The proposed terminal building would require the relocation of vehicular parking, airfield fencing, and an existing covered patio. Contingent upon available funding, the project also includes minor expansion of the aircraft apron to provide parking for transient aircraft, the installation of aircraft tie-downs, the resurfacing of a portion of the existing hangar apron, the installation of electric vehicle (EV) charging stations for both vehicles and aircraft, and the extension of 3-phase power service from State Route 113 to the new terminal building.

This document was prepared to satisfy the requirements of the National Environmental Policy Act (NEPA) of 1969 to address potential impacts associated with the proposed terminal building. FAA Order 1050.1G: *FAA NEPA Implementing Procedures* became effective June 30, 2025. The EA was substantially completed prior to the release of FAA Order 1050.1G. Therefore, the EA was conducted in accordance with the following Federal Aviation Administration (FAA) guidelines:

- FAA Order 1050.1F: *Environmental Impacts: Policies and Procedures*
- FAA Order 1050.1F's: *Environmental Desk Reference for Airport Actions (Version 3, 2023)*

Under FAA Order 1050.1G, the proposed action is a categorically excluded action. Therefore, a Documented CatEx was prepared to satisfy NEPA, and the EA is now considered supporting documentation for the Documented CatEx. The EA confirms that the proposed action does not involve any extraordinary circumstances and would not have a significant effect.

On February 25, 2025, the U.S. Council on Environmental Quality (CEQ) issued an interim final rule in the Federal Register titled *Removal of National Environmental Policy Act Implementing Regulations*. The Interim Final Rule removed CEQ's regulations implementing NEPA from the Code of Federal Regulations (CFR). It concluded that CEQ regulations implementing NEPA are not judicially enforceable or binding. The FAA has elected to continue to follow its policies and procedures implementing NEPA per FAA Order 1050.1F to meet the agency's obligations under NEPA, 42 USC §§ 4321 et. seq.

This EA includes the following chapters:

- Chapter 1: Introduction
- Chapter 2: Purpose & Need
- Chapter 3: Alternatives
- Chapter 4: Affected Environment and Environmental Consequences
- Chapter 5: Public Outreach
- Chapter 6: List of Preparers

1.1 Background

6B0 is a public-use airport owned by the State of Vermont and maintained by VTrans. The Airport is in Addison County within the Town of Middlebury, approximately six miles southwest of the Middlebury central business district and approximately one mile north of the community of East Middlebury. The Airport is accessible on the ground via Vermont State Route 113, 125, and Highway 7. **Figure 1-1** depicts the location of 6B0 with respect to the State of Vermont and the Addison County region.

The Airport is currently classified with a role of “Local.” As stated in the FAA’s 2025-2029 National Plan of Integrated Airport Systems (NPIAS) report, a local airport, “provides communities with access to local and regional markets, is generally located near larger population centers, and has moderate levels of activity with some multi-engine propeller aircraft.” Additionally, 6B0 is classified as a Category 2 airport within the Vermont State Aviation System Plan (VSASP). According to the VSASP, Category 2 airports, “offer a higher level of facilities and services than Category 1 Airports, typically have equipment that enhances safety of use during inclement weather, and complimentary facilities and services that may be able to accommodate smaller jet aircraft during favorable conditions.” A terminal building provides one of the necessary recommendations for a Category 2 airport.

A Master Plan was completed for 6B0 in August 2023, which included an inventory of existing conditions, forecasting of future operations at the Airport, an assessment of airside and landside facility requirements, an evaluation of alternatives, and recommendations for future development. The Master Plan public involvement process informed the recommendations in the plan, which included improvements to vehicle parking and aircraft tie-downs, construction of a standalone terminal building, and installation of EV charging stations. The landside facility requirements recommended pavement rehabilitation of the apron areas.

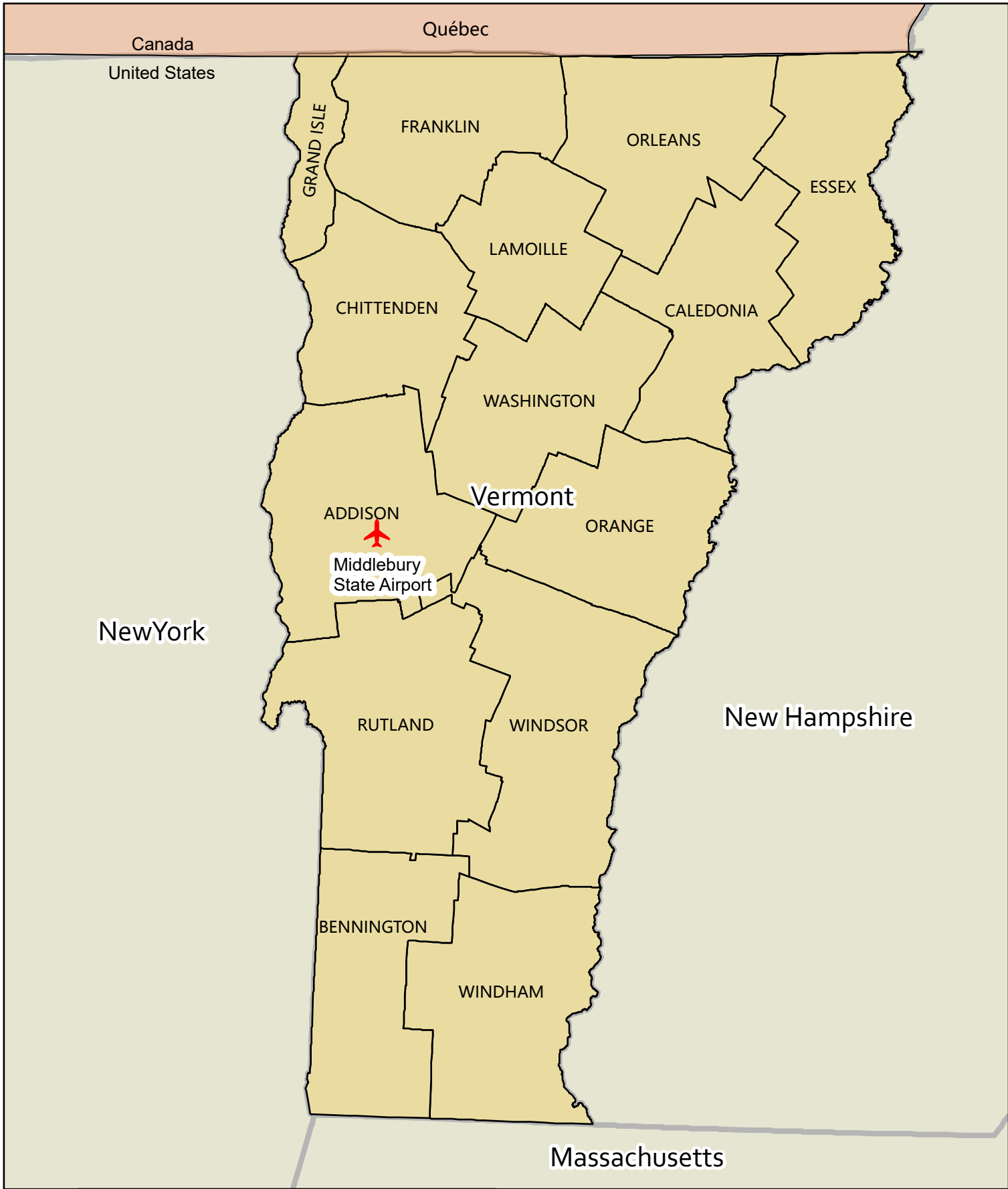
1.2 Airport Overview

6B0 operates under a single runway, Runway 1/19, which is oriented north and south. A system of taxiways provides aircraft connectivity between the runway and the aircraft parking aprons, hangars, and other facilities. Taxiway A is the primary taxiway providing full-length access to each runway end. Airport aprons, also referred to as ramps, provide space for short-term and long-term aircraft parking and operations. There are a total of three public-use apron areas at 6B0. The Lower (North) Apron is located in the northern portion of the Airport, west of the Runway. This apron area is 120,915 sq. ft. and contains 42 aircraft tie-down positions. The Fueling Apron is located southeast of the North Apron and consists of 16,470 sq. ft. of pavement used as a staging area and for fueling. The Terminal Apron is located in the central portion of the Airport and is approximately 9,000 sq. ft. used for aircraft parking. Currently, a 5,400 sq. ft. hangar space located between Airport Road and the Terminal Apron is used as a terminal building. **Figure 1-2** shows the location of the identified airport facilities.

1.3 Sponsor’s Proposed Action

The Sponsor’s Proposed Action includes the development of an approximately 1,800-sq. ft. single-story terminal building to serve existing light general aviation activity (see **Figure 1-3**). The proposed action will also involve the following:

- Construct new vehicular parking lot (approximately 5,900 sq. ft.)
- Expand apron approximately 4,400 sq. ft.
- Relocate the existing patio/picnic area



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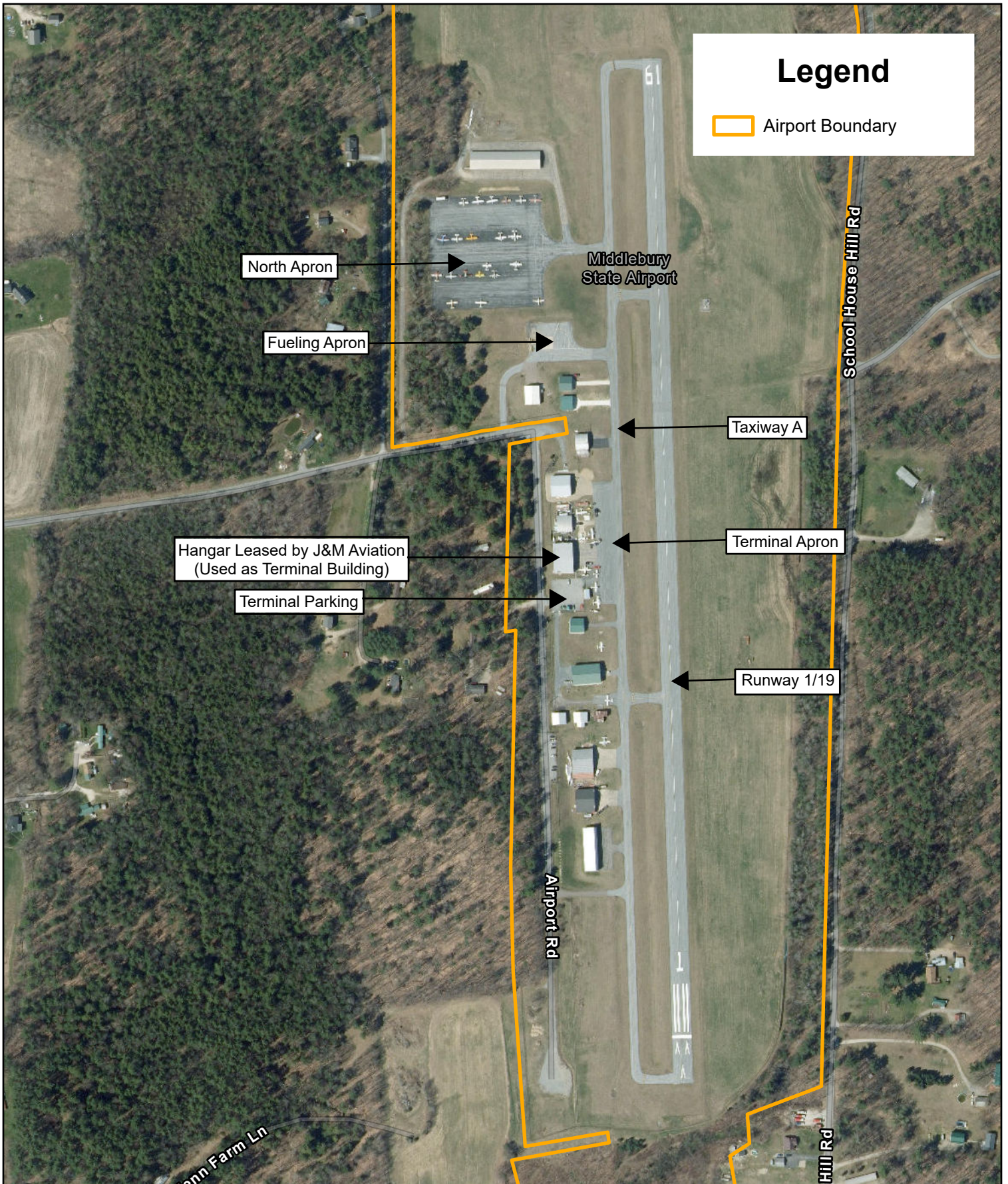


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Figure 1-1:
Middlebury State Airport Location
Middlebury, VT

Source Data
CHA, 2025



Legend

 Airport Boundary



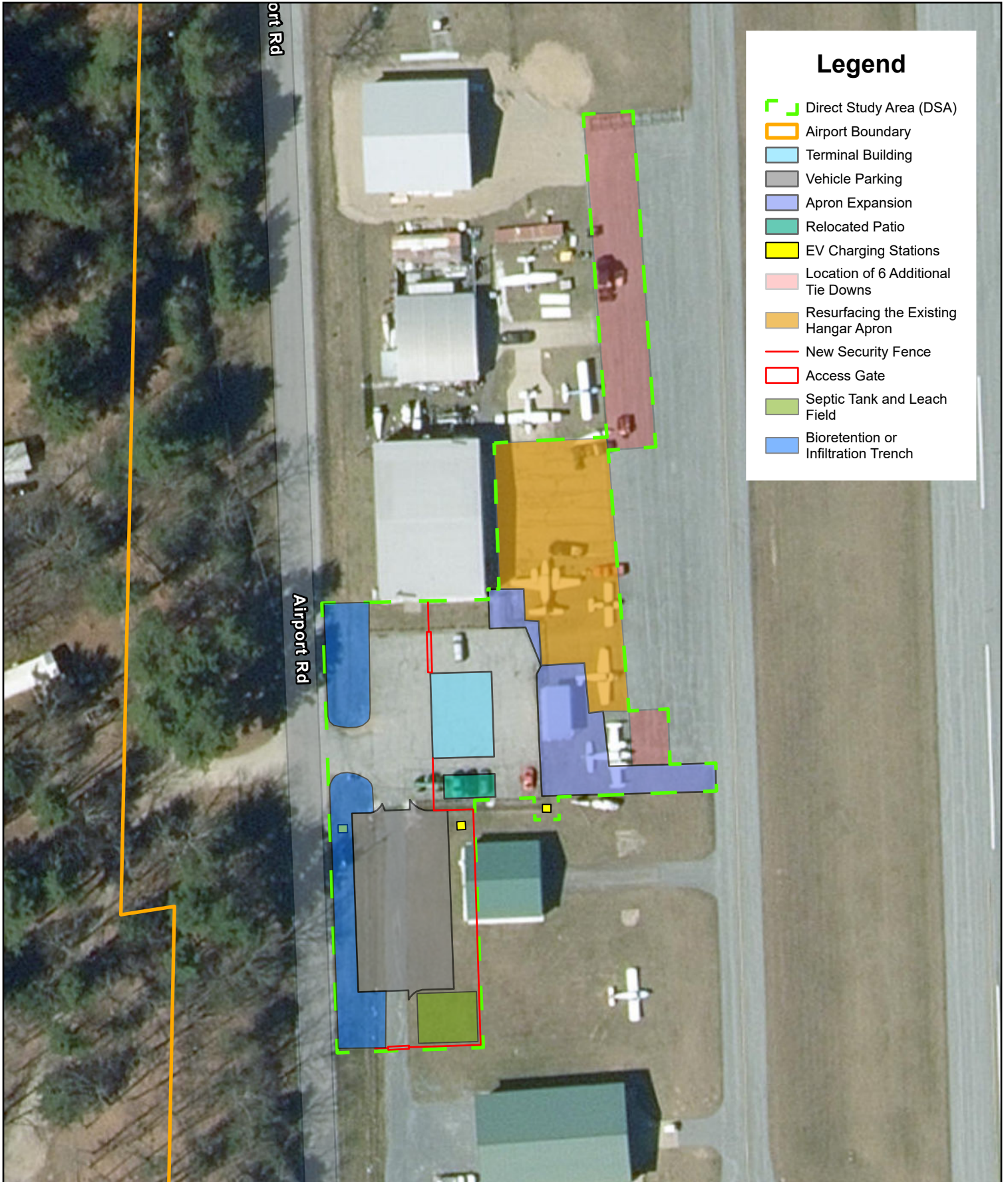
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**Figure 1-2:
Airport Facilities Map**

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan



1" = 75"

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Figure 1-3: Sponsor's Proposed Action

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan

- Rehabilitate approximately 8,900 sq. ft. of existing apron
- Install 6 additional tie-downs
- Install approximately 260 linear feet of new security fence
- Install EV chargers for vehicles and aircraft
- Construct stormwater improvements
- Extend 3-phase power from SR 113

1.4 Federal Actions

As part of the Master Plan, the FAA conditionally approved the Airport Layout Plan (ALP) depicting the proposed development for the next 20 years. VTrans, as owner and operator of the Airport, is requesting the following federal actions:

- Environmental approval for federal assistance to implement the construction of the Proposed Action
- Unconditional approval of the ALP depicting the Proposed Action pursuant to 49 U.S.C. §§ 40103(b) and 47107(a)(16).

1.5 Timeframe of the Sponsor's Proposed Action

VTrans expects to submit the Documented CatEx to the FAA in January 2026 and anticipates the environmental finding in early 2026. Design began at the end of 2025. While the timeline is dependent on grant funding, construction is scheduled to begin in 2027.

2.0 PURPOSE & NEED

Pursuant to NEPA and FAA Order 1050.1F, an EA must include a description of the purpose of a proposed action and why it is needed. The purpose and need for the proposed action serve as the foundation for the identification of reasonable alternatives to the proposed action and the comparative evaluation of the project's impacts. For an alternative to be considered viable and carried forward for detailed evaluation within the NEPA process and this EA, it must address the needs described in the following sections.

2.1 Purpose

The Addison County Regional Plan, adopted in July 2018, identifies the goal of promoting “the Middlebury Airport to support economic development in the Region.” To achieve this, the Addison County Regional Planning Commission states that implemented policy should “*Support infrastructure investment and services necessary to allow the Middlebury Airport to function effectively as a small, regional airport.*”

The purpose of the Sponsor's Proposed Action is to serve existing light general aviation activity by providing support facilities for aircraft, pilots, and passengers. This recommendation, as outlined as part of the Master Plan, was not based on a specific activity level, but rather to support airport users with a minimum standard public facility, as the Airport currently has no terminal building. Of the ten public airports in Vermont included in the NPIAS, 6B0 is the only one without an existing public terminal building. As discussed in Chapter 1, the VSASP recommends that every public airport has a terminal building. A “Basic Terminal Building” is listed as a minimum facility standard for even a Category 1 airport. As a Category 2 airport, it is further recommended that the facility be provided with specific pilot and visitor amenities at 6B0.

Specifically, the Master Plan recommended a 1,500 to 2,000 sq. ft. terminal facility with restrooms and public space, flight planning areas for pilots, and a sheltered location for pilot and passenger use both before and after flights. Providing an area for airport operations and management would be an added benefit. It should be noted that a terminal building planning study would be completed as part of the design phase to determine FAA Airport Improvement Program (AIP) eligibility for certain terminal amenities within the building itself.

2.2 Need

The Sponsor's Proposed Action is needed based on the lack of a stand-alone terminal building and electrical charging infrastructure, in addition to the decay of existing infrastructure. The existing structure utilized as a terminal is a 5,400 sq. ft. hangar with small offices. According to the Master Plan, the building is owned by VTrans and leased by J&M Aviation, an aircraft maintenance services provider. Although J&M Aviation leases the entirety of the building, a small pilot/passenger lounge area containing a restroom and sitting area is located within the southern portion of the building. The lack of a dedicated terminal building offering amenities that are typical at a general aviation airport, such as a pilot lounge, restrooms, storage, office space, and meeting space, was identified as a facility requirement in the Master Plan. Construction of the terminal building would require the relocation of an existing patio, vehicular parking lot, and airfield fence.

The pavement being resurfaced was constructed more than 25 years ago and has not had major rehabilitation. This pavement has met its useful life, per the FAA AIP Handbook. The installation of additional tie-down anchors would provide security and improve safety for visiting aircraft.

With the increase of EV sales and the introduction of electric aircraft within the past few years, the Master Plan recommended planning for the introduction of EV chargers. Public comments solicited as part of the Master Plan favored the introduction of EV chargers at 6B0 to support the reduction of air emissions. Installation of this technology requires the extension of 3-phase electric power service from Route 113 to the site. Currently, the Airport does not have any EV infrastructure.

3.0 ALTERNATIVES

NEPA and FAA Order 1050.1F require the consideration of alternatives commensurate with the Purpose and Need statement. The intent is to evaluate various options that address the recognized need so that potential environmental impacts can be analyzed and compared. This chapter presents a description and analysis of alternatives considered to meet the identified Purpose and Need. The three alternatives presented in this chapter are a No-Action alternative and two build alternatives (a “central location” and a “north location”) relative to their location on the airport (see **Figure 3-1**).

3.1 Alternative 1: No Action Alternative

As part of the No Action Alternative, the actions described in either build alternative would not occur. Although not always reasonable, feasible, or practicable, the No Action Alternative is a required alternative under NEPA and serves as the baseline for assessing future conditions and impacts. The new terminal building would not be constructed with the No Action Alternative. The office portion of J&M's facility would continue to be used as a makeshift terminal area, providing minimal amenities, and the connected actions would not occur. Parking facilities would remain near capacity, and the apron pavement conditions would continue to deteriorate, presenting safety hazards. Although the No Action alternative has the least potential to impact the environment, as no construction is involved, the No Action Alternative does not meet the stated Purpose and Need for the project and was not selected as the preferred alternative.

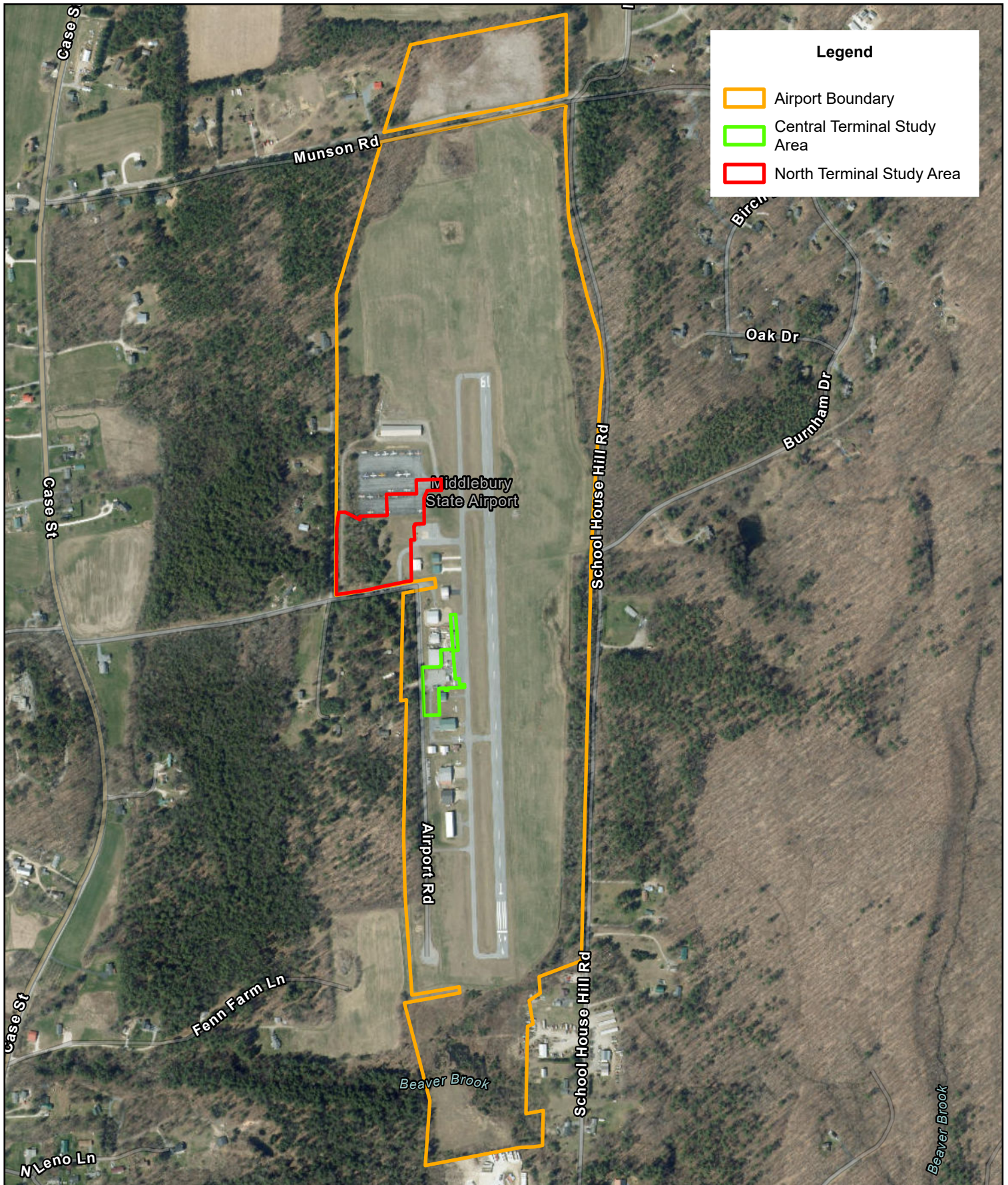
3.2 Alternative 2: Construct Terminal Building – Central Location

Alternative 2 involves the construction of an 1,800 sq. ft. terminal building in a location central to existing development at 6B0. The terminal building would be located south of a hangar operated by J&M, north of another private hangar, and west of the main apron area (see **Figure 3-2**). Given the position between two existing hangars, the site is somewhat constrained. However, this location is centrally located with access via Airport Road and would not require constructing a new entrance road. The taxi distance to the fuel farm from this location is approximately 900 feet.

With Alternative 2, the new terminal building would be constructed on a previously paved surface currently used as a vehicular parking lot. The existing parking lot accommodates approximately 15 vehicles and is often near capacity. A new 5,960 sq. ft. parking lot would be constructed to mitigate the displaced parking and to increase the total number of parking spaces. The new parking lot would likely be constructed west of the private hangar and would be partially constructed on a previously paved road. Because the new terminal building and the new parking lot would be constructed on a previously paved surface, the increase in impervious surface resulting from Alternative 2 would be limited to approximately 7,700 sq. ft, which limits the potential for impacts to protected species and cultural resources.

The terminal building's new location would necessitate relocating the airfield fence and a covered patio. Depending on available funding, Alternative 2 may include the following additional components:

- Installation of 6 tie-down anchors
- Resurfacing of approximately 9,000 sq. ft. of existing apron
- Installation of EV charging stations for vehicles and aircraft
- Extension of 3-phase electric power service



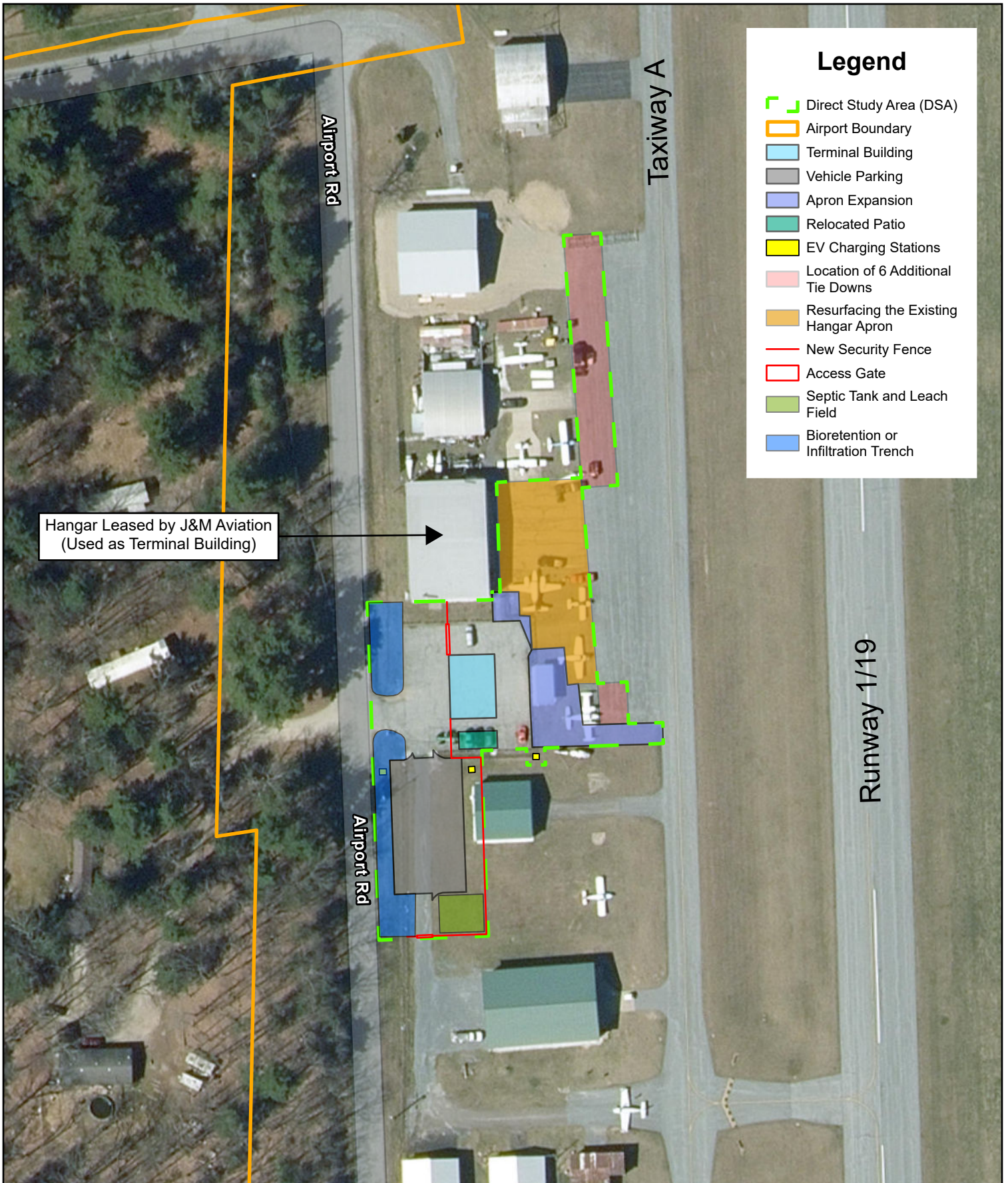
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Figure 3-1:
Central and North Alternative Location

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan



1" = 100"

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Figure 3-2:
Alternative 2: Construct Terminal Building - Central Location
Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan

3.3 Alternative 3: Construct Terminal Building – North Location

Alternative 3 involves the construction of an 1,800 sq. ft. terminal building in the area south of the North Apron and west of the Fueling Apron (see **Figure 3-3**). A new, approximately 9,100 sq. ft. parking lot would be constructed south of the new terminal building, and an approximately 4,500 sq. ft. apron area would be expanded to connect the terminal building to the existing North Apron. Construction of a new entrance road would be required to connect the new development to Airport Road. This location would provide terminal users with easy walking access to the fuel farm. However, the aircraft taxi distance from this location is nearly equivalent to Alternative 2.

Given the grade changes within the study area, Alternative 3 would require significant grading, which would raise project costs and have a greater impact on environmental resources. Grading and stormwater management improvements as part of Alternative 3 would impact the forested area west of the proposed development. As documented during the field visit completed in November 2024, this area of trees provides suitable habitat for the Indiana bat (*Myotis sodalis*), an endangered species, and the tricolored bat (*Myotis subflavus*), a proposed endangered species (see **Appendix A**). Informal coordination with the U.S. Fish & Wildlife Service (USFWS) indicates that the construction of the terminal in this location “May Affect” both the Indiana bat and the tricolored bat and would require additional coordination with the USFWS and the Vermont Department of Fish & Wildlife to identify avoidance and minimization measures before construction could occur. Wildlife hazards must be considered during design when constructing stormwater improvements that may necessitate a detention pond. Additionally, past archaeological investigations north and west of the North Apron have identified archaeologically sensitive areas relevant to the location of this Alternative.

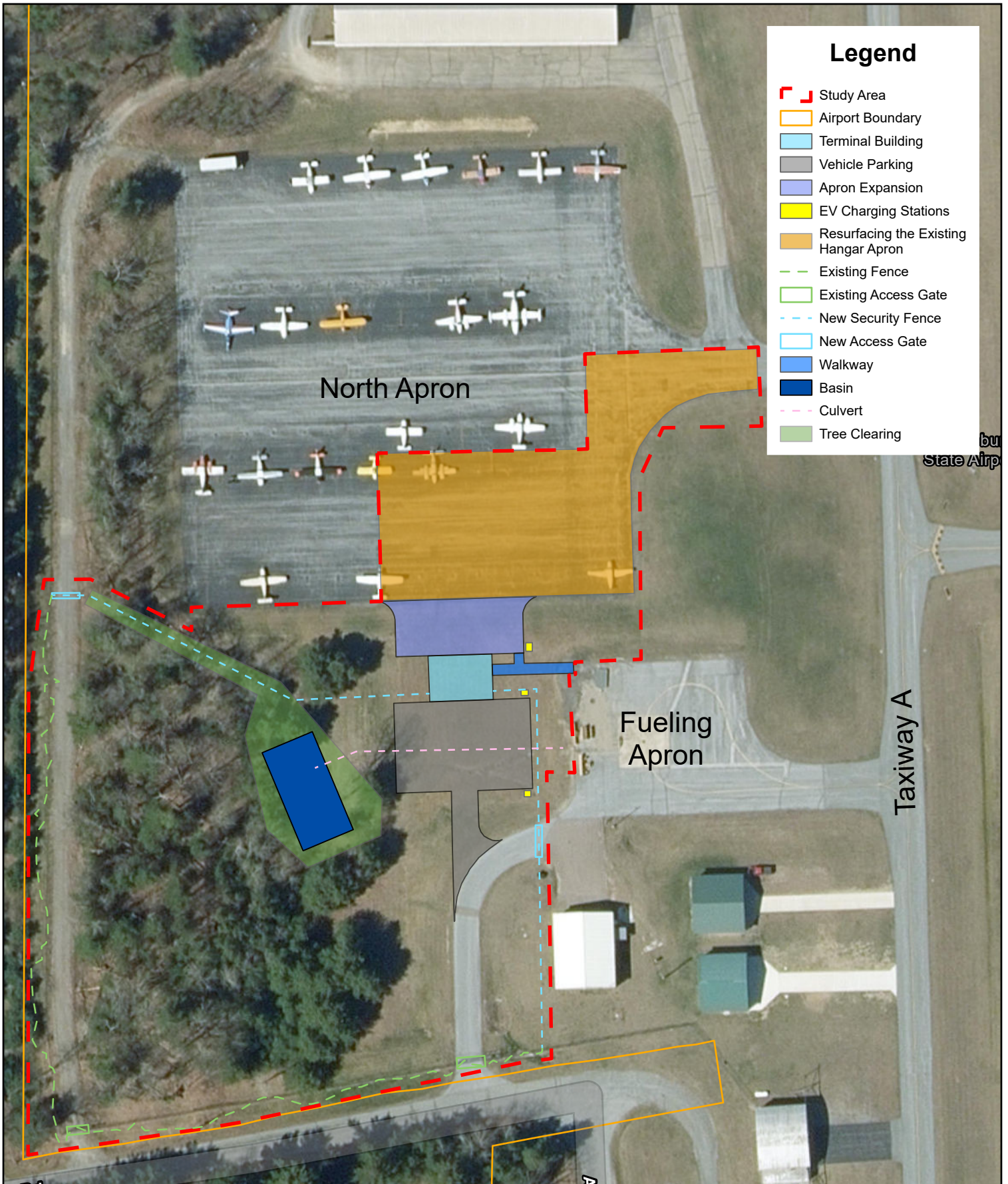
The location of the new facility would also require relocating the airfield fence and removing at least three existing tie-downs on the apron. The adjustment to the airfield fence would provide wildlife hazard benefits, given that the forested area adjacent to this site would now be excluded from the airfield. The tie-downs proposed for removal are infrequently utilized because of their north-facing orientation; therefore, replacing these tie-downs would not be necessary. Alternative 3 would also involve resurfacing approximately 30,000 sq. ft. of apron area, installing EV chargers, and extending 3-phase power services, depending on available funding.

While significant support was expressed for the construction of a terminal building, future development in this area was notably opposed during the Master Planning process. Residents near this location expressed concerns about the development of this area because of potential noise and the alteration of the viewshed from their properties.

3.4 Alternatives Considered and Dismissed

With consideration of satisfying the Purpose and Need, various alternatives were developed and discussed in the previous sections. After comparing the alternatives, Alternative 2 and the No Action Alternative will be carried forward for detailed impact analysis. **Table 3-1** summarizes the screening process for potential alternatives. The alternatives were screened against the below criteria:

- Does the location provide operational benefits for 6B0?
- Which location is likely to result in less environmental impact?
- Which location results in a greater increase in impervious surface?
- Which location requires tree removal?



1" = 100"

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Figure 3-3:
Alternative 3: Construct Terminal Building - North Location
Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan

- Which location has a higher likelihood of encountering archaeological resources?
- Which location faces constructability concerns?
- Which location may provoke greater public opposition?

Table 3-1. Preliminary Alternatives Screening

Alternatives	Provides Operational Benefits	Constructability Concerns	Increases Impervious Surface	Requires Tree Removal	Known Cultural Resources Present Nearby	Expressed Public Opposition
Alternative 2: Central Terminal Location	Yes	No	Less: 7,700 sq. ft. increase	No	No	Less
Alternative 3: North Terminal Location	Yes	Yes	More: 15,400 sq. ft. increase	Yes	Yes	More

The new terminal building would provide operational benefits to the Airport in either location. While the northern location appears closer to the fuel farm, the taxi distance to the Fueling Apron is equivalent in both locations. The operational benefits of Alternative 2 and Alternative 3 are considered equal. However, each alternative differs in constructability, environmental impact, and public perception. Alternative 2 is constrained by existing development, requiring the relocation of a covered patio before construction. Alternative 3 is constrained by elevation. Alternative 3 would require significant grading and stormwater upgrades, which would increase project cost and would necessitate tree removal, resulting in potential impacts to federally protected species. Both alternatives require relocating the airfield fence, but the northern location would require a greater shift. Public comments during the master planning process indicated opposition to Alternative 3, which was not as prevalent as with Alternative 2. Given this analysis, it has been determined that *Alternative 3: North Terminal Building Concept* faces significant constructability, environmental impact, and public opinion concerns and will not be carried forward.

3.5 Sponsor's Proposed Action

Alternative 2: Central Terminal Location is the Preferred Alternative. This alternative meets the Purpose and Need while limiting environmental impacts and considering public opposition. Utilities, including 3-phase power, will be connected to the new facilities. While the exact location of utilities would be determined during design, J&M's hangar is connected to municipal water, energy, and an existing on-site septic system. If additional septic capacity is determined to be necessary during design, the new system could be sited within the study area. A preliminary stormwater concept has been developed for the Preferred Alternative. The area between Airport Road and the existing and proposed parking lots could be converted to either a bioretention area or an infiltration trench to meet the Vermont stormwater management rule. The stormwater concept and the potential location of the new septic system, if deemed necessary during design, are shown in **Figure 3-2**.

The visual character of the new facility will be closely tied to existing development in the area. A visual rendering of the new terminal building is shown in **Figure 3-4**. The remainder of this EA will evaluate potential impacts for Alternatives 1 and 2.

Existing Rendering



Proposed Rendering



1' = 400"

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Figure 3-4: Terminal Building Rendering

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan

4.0 AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES

This chapter describes the environment that may be affected and the potential environmental, social, and economic impacts associated with the Sponsor's Proposed Action. The analysis was conducted in accordance with FAA Order 5050.4B "*National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*," FAA Order 1050.1F "*Environmental Impacts: Policies and Procedures*," and applicable federal and state environmental regulations. Based on the information in this chapter, coordination with federal and state agencies, and review of public comments, the FAA will determine if the Sponsor's Proposed Action would involve significant impacts. The FAA will also ensure that the document presents a full, accurate, and fair assessment of the environmental consequences of the Sponsor's Proposed Action. Anticipated permit requirements and a potential impact summary are provided at the end of the chapter. Consistent with FAA Orders 5050.4B and 1050.1F, the following impact categories are addressed:

- Air Quality
- Biological Resources
- Climate
- Coastal Resources
- Department of Transportation Act, Section 4(f) Resources
- Section 6(f) Resources
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Historical, Architectural, Archaeological, and Cultural Resources
- Land Use
- Natural Resources and Energy Supply
- Noise and Land Use Compatibility
- Socioeconomics and Children's Environmental Health & Safety Risks¹
- Visual Effects
- Water Resources (Wetland, Surface Waters, Groundwater, Floodplains, and Wild & Scenic Rivers)

¹ Pursuant to the January 29, 2025, US DOT memorandum "*Implementation of Executive Orders (EO) Addressing Energy, Climate Change, Diversity and Gender*," the EA will not include a discussion of Environmental Justice in the NEPA documentation.

4.1 Study Area

As part of this EA, two study areas have been defined to assess the potential direct and indirect impacts of the alternatives on environmental resources. The Detailed Study Area is primarily used to determine direct impacts, while the Generalized Study Area addresses indirect impacts to resources. Both study areas are described below.

4.1.1 Detailed Study Area

The Detailed Study Area (DSA) is the area that may be physically disturbed by the proposed project. The DSA boundary, which is limited to less than an acre of land, is shown in **Figure 4-1**. The DSA consists of paved surface and grass maintained for airport operations. This area is entirely within airport property.

4.1.2 Generalized Study Area

The Generalized Study Area (GSA) is the area surrounding the DSA that the proposed action may not physically alter but accounts for resources that may be indirectly affected by the proposed action. The GSA often includes communities surrounding the Airport and specific community facilities, structures, and natural features. Although it varies depending on the resource category, the GSA associated with the Sponsor's Proposed Action is contained to the City of East Middlebury. It is generally defined by a 0.25-mile buffer around the DSA (see **Figure 4-2**).

4.2 Environmental Resource Categories Not Affected

Of the environmental impact categories defined in FAA Order 1050.1F, the following resources have been eliminated from further consideration because they do not exist within or near the GSA and will not be carried forward in the EA.

- Coastal Resources
- Wild & Scenic Rivers
- Floodplains

4.2.1.1 Coastal Resources

The U.S. Congress recognized the importance of meeting the challenge of continued growth in the coastal zone by passing the Coastal Zone Management Act (CZMA) in 1972. One of the programs outlined by the CZMA is the National Coastal Zone Management Program (CZMP). This voluntary partnership is between the federal government and coastal and Great Lakes states and territories. Under this program, state governments design unique coastal zone management programs, which are subsequently approved by the National Oceanic and Atmospheric Administration (NOAA). Once the programs have been approved, the CZMA requires that any federal actions that could have a reasonably foreseeable impact on a state's coastal zone, even if the action occurred outside of the designated coastal zone, be consistent with that state's approved coastal management program. The goal of the Act is to "preserve, protect, develop, and, where possible, to restore or enhance the resources of the nation's coastal zone." Vermont is an entirely land-locked state, providing no direct access from its borders to coastal areas. Due to this, Vermont does not have its own CZMP. Based on a review of the USFWS Coastal Barrier Resources System Mapper, the project is not within a coastal barrier. Since there are no coastal resources present, no further analysis is required.



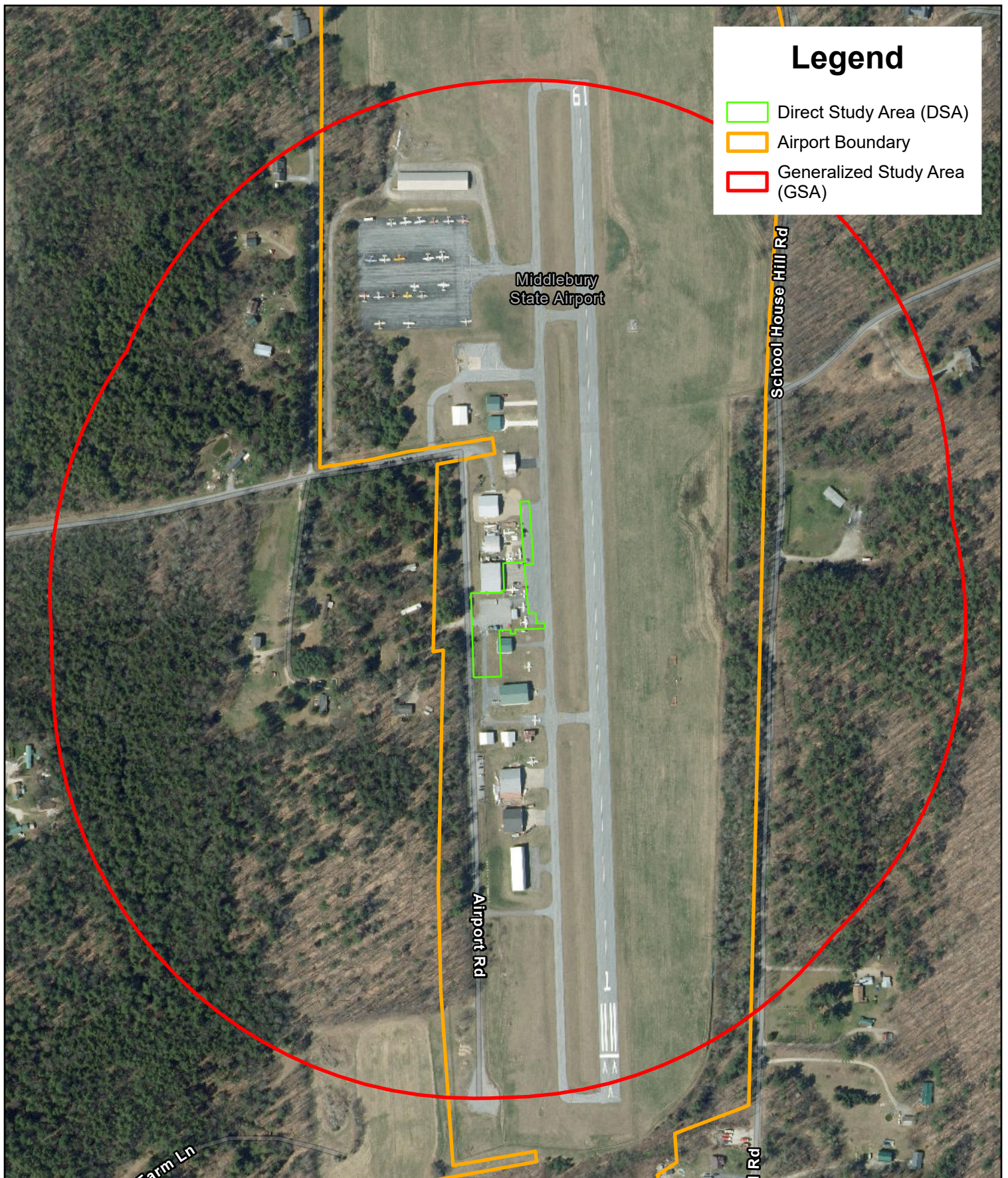
1" = 400"

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Figure 4-1: Direct Study Area

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan



Legend

- Direct Study Area (DSA)
- Airport Boundary
- Generalized Study Area (GSA)



1" = 400"

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Figure 4-2:
Generalized Study Area
Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan

4.2.1.2 Water Resources (Floodplains)

EO 11988 defines floodplains as “lowland and relatively flat areas adjoining inland and coastal waters, including flood-prone areas of offshore islands, including, at a minimum, the area subject to a one percent or greater chance of flooding in a given year.” The intent of Order 11988 is to ensure that floodplains and floodways are kept clear of obstructions and facilities that could restrict or increase flow rates or volumes during flood conditions. Encroachment is defined as any action that would cause the 100-year water surface profile to rise by one foot or more.

FEMA has adopted the 100-year floodplain as the base flood for floodplain management. Both federal and state laws regulate development within floodplains and floodways. Floodplains are also regulated through multiple jurisdictions, including the National Flood Insurance programs at the municipality level and the Act 250 Land Use Permit program and the River Corridor & Floodplain Protection Rule at the state level through the VDEC. A review of the Vermont Wetland Inventory Map and the Vermont Agency of Natural Resources (ANR) Natural Resources Atlas, which includes Flood Hazard Areas, indicates that no mapped Floodways or Special Flood Hazard Areas are located within or adjacent to the DSA. No further analysis is warranted.

4.2.1.3 Water Resources (Wild & Scenic Rivers)

The Federal regulatory program protecting wild and scenic rivers is the Wild and Scenic Rivers Act, administered by the National Park Service. According to the National Wild and Scenic River System map, no Wild and Scenic Rivers are present near the DSA. The National Park Service Nationwide Rivers Inventory was also reviewed for the presence of river segments believed to possess features that make them a candidate for inclusion in the National Wild and Scenic River System. Vermont has approximately 7,099 miles of river, of which 46.1 miles are designated as Wild and Scenic. Based upon a review of the National Wild and Scenic Rivers System, no rivers with this designation are located within or surrounding the DSA. No further analysis is warranted.

4.3 Air Quality

4.3.1 Regulatory Context

Under the Clean Air Act (CAA) Amendments of 1990, the U.S. Environmental Protection Agency (EPA) developed the National Ambient Air Quality Standards (NAAQS) for six common air pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM), sulfur dioxide (SO₂), and lead (Pb). Nitrogen oxides (NO_x) and volatile organic compounds (VOC) are regulated as precursors to ozone (see **Table 4-1**). In accordance with the CAA, all areas within Vermont are designated with respect to compliance or degree of non-compliance, which are either in attainment or non-attainment. An area with air quality better than the NAAQS is designated as an attainment area, and an area with air quality worse than the NAAQS is designated as a nonattainment area. Nonattainment areas are further classified as extreme, severe, serious, moderate, or marginal. Attainment areas that were initially designated as nonattainment areas but have been redesignated as in attainment are considered maintenance areas. Maintenance Plans, put in place to ensure continued compliance with the NAAQS, are required for maintenance areas and are implemented over two 10-year intervals.

Table 4-1. National Ambient Air Quality Standards

Pollutant	Primary/Secondary	Averaging Time	Level	Form
Carbon Monoxide (CO)	Primary	8-hours	9 ppm	Not to be exceeded more than once per year
		1-hour	35 ppm	
Lead (Pb)	Primary & Secondary	3-month average	0.15 µg/m ³	Not to be exceeded
Nitrogen Dioxide (NO ₂)	Primary	1-hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	Primary & Secondary	1-year	53 ppb	Annual mean
Ozone (O ₃)	Primary & Secondary	8-hours	0.070 ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particulate Matter (PM _{2.5})	Primary	1-year	9.0 µg/m ³	Annual mean, averaged over 3 years
	Secondary	1-year	15.0 µg/m ³	Annual mean, averaged over 3 years
	Primary & Secondary	24-hours	35 µg/m ³	98 th percentile, averaged over 3 years
Particulate Matter (PM ₁₀)	Primary & Secondary	24-hours	150 µg/m ³	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO ₂)	Primary	1-hour	75 ppb	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	Secondary	1 year	10 ppb	Annual mean, averaged over 3 years

Source: U.S. EPA; CFR, Title 40, Part 50, Section 121

4.3.2 Affected Environment

The project area is within Addison County, which is part of the Champlain Valley Interstate Air Quality Control Region (40 CFR 81, Subpart B, §81.48). According to the EPA Green Book, Addison County is in attainment for all criteria pollutants. All of Vermont is in an Ozone Transport Region (OTR). States in this region must submit a State Implementation Plan (SIP) and install a certain level of control for the pollutants that form ozone, even if they meet the ozone standards.

4.3.3 Environmental Consequences

Two primary regulations apply to air quality: NEPA and the CAA. The need for an air quality assessment to satisfy NEPA depends on the nature of the project, the project area's non-attainment status, and the size of the Airport. Under NEPA, the impact of a proposed action on air quality must be assessed by evaluating the impact of the proposed action on conformance

with the NAAQS. The CAA amendments of 1990 include provisions to ensure emissions from federally funded actions within non-attainment areas comply with the goals and objectives of the SIP for the state where the project is located.

4.3.3.1 Significance Threshold

As provided in FAA Order 1050.1F, an action would cause significant air quality impacts if pollutant concentrations were to exceed one or more of the NAAQS, as established by the EPA under the CAA, for any of the time periods analyzed or to increase the frequency or severity of any such existing violations.

Additionally, while not a significance threshold for NEPA, the EPA promulgated the General Conformity Rule in 1993 to implement the conformity provision of Title I, 176I (1) of the CAA Amendments of 1990. Applicability of the General Conformity Rule depends on whether construction emissions will affect attainment as outlined in the SIP. The threshold levels, or *de minimis* levels, for each of the criteria pollutants are established under the CAA to determine if a proposed action could affect attainment status.

4.3.3.2 Alternative 1: No Action Alternative

Under the No-Action Alternative, the Sponsor's Proposed Action would not be constructed or operated in the future. Impacts on air quality would not occur.

4.3.3.3 Alternative 2: Construct Terminal Building – Central Location

According to the FAA's recent update to the *Aviation Emissions and Air Quality Handbook*, version 4, and the *Technical Support Document for Attainment Area Screening Methodology* (July 2024), an Attainment Area Screening Methodology is now required for areas that are in attainment. If the attainment area is within an OTR, more stringent criteria are utilized during the screening process. The four questions supporting the Screening Criteria are:

- Will the FAA decision result in an increase of more than 14,000 commercial aircraft operations per year or, if the project is in an OTR, more than 5,000 general aviation aircraft operations per year?
- Will the FAA decision result in an increase of more than 340,000 minutes of aircraft delay per year?
- Will the FAA decision result in an additional 25 million vehicle miles traveled (VMT) per year?
- Will the FAA decision result in the use of more than 125 construction vehicles or ground support equipment (GSE) during a year or, if the project is in the OTR, 50 construction vehicles or GSE during a year?

The construction of the terminal building and associated projects is expected to occur in 2027. Alternative 2 was evaluated based on the four screening parameters discussed above that could cause or contribute to air emissions. This screening method, with consideration of the OTR, has been applied to Alternative 2 and is outlined below:

- A. Increase in Aircraft Landing and Take-off Cycle (LTOs) / 5,000
 - a. $0/5,000 = 0$

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

a. $0/340,000 = 0$

C. Ground Access Vehicle Trips VMT / 25,000,000

a. $0/25,000,000 = 0$

D. Number of pieces of GSE and Construction Equipment / 50

a. $20/50 = 0.4$

If $A + B + C + D$ is greater than or equal to 1.0, a more detailed emissions inventory must be prepared. Alternative 2 would not increase airport operations and, therefore, would not alter aircraft LTOs. Given the new terminal's proximity to the facility currently used as a terminal building, an increase in taxi time or delay would not occur. The use of ground access vehicles and people traveling to/from the Airport is not expected to change, and, therefore, VMT would not increase due to the implementation of Alternative 2. The proposed construction equipment, such as an excavator, bulldozer, paver, or crane, would be used during construction. While the number of GSE and construction equipment would typically be divided by 125, this number was divided by 50 because the proposed project is located within an OTR. Based on the Attainment Area Screening Methodology, the value calculated for Alternative 2 is less than 1.0; therefore, it does not have the potential to cause significant air quality impacts, and no further analysis is necessary.

4.4 Biological Resources

4.4.1 Regulatory Context

The United States Congress passed the Endangered Species Act of 1973 (ESA), as amended 16 USC 1531 et seq., to conserve those species that are endangered or threatened with extinction (federally listed species). The ESA also provides for the protection of designated critical habitat on which endangered or threatened species depend for survival. Under Section 7 of the ESA, the FAA is required to consult, at a minimum, with the United States Fish & Wildlife Service (USFWS) and/or the National Marine Fisheries Service, as applicable, to ensure that any action the FAA authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat.

Pursuant to the Migratory Bird Treaty Act of 1918 (16 USC §§703-712), it is illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid federal permit. The Bald and Golden Eagle Protection Act (16 USC §668-668c) prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald and golden eagles, including their parts, nests, or eggs.

4.4.2 Affected Environment

4.4.2.1 Federally Protected Species

The USFWS Information for Planning and Consultation (IPaC) website was reviewed in January 2025 for federally listed species (see **Appendix A** for the IPaC Summary). The website indicated that the following species may occur or could potentially be affected by activities within the DSA:

- Indiana Bat (*Myotis sodalis*), Endangered
- Northern Long-eared Bat (*Myotis septentrionalis*), Endangered

- Tri-colored Bat (*Perimyotis subflavus*), Proposed Endangered
- Monarch Butterfly (*Danaus plexippus*), Proposed Threatened

The IPaC indicates that no critical habitat for these species exists within the DSA. CHA conducted a field survey of the DSA on November 20, 2024 (see **Appendix A** for the Field Memorandum). The project area is predominantly characterized by existing impervious surface and mowed grass. No forested areas or other unique natural areas are located within the DSA.

According to the USFWS, most reproductive female Indiana Bats roost in trees during the summer months that are greater than or equal to five inches in diameter at breast height (dbh), may be living or dead, and exhibit characteristics like exfoliating bark, broken limbs, broken tops, cracks, or crevices. These roost trees are typically within canopy gaps in a forest, fence line, or bottomland and floodplain habitats, wooded wetlands, and upland communities. During the winter, Indiana Bats are restricted to suitable underground hibernacula, mostly hibernating in caves and cave-like locations, including abandoned mines.

Northern Long-eared Bats (NLEBs) migrate to summer roosts after hibernation ends in late March or early April. The active season is between emergence and hibernation from April 1 through October 31. Suitable summer habitat consists of a wide variety of forested/wooded habitats where they roost, forage, and travel. It may also include some adjacent and interspersed non-forested habitats. This includes forests and woodlots containing potential roosts and linear features such as fence rows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. They roost in cavities, underneath bark, crevices, or hollows of both live and dead trees and/or snags typically greater than or equal to 3 inches dbh. They are known to use a wide variety of roost types, using tree species based on the presence of cavities and crevices or the presence of peeling bark. They have also been occasionally found roosting in structures like buildings, barns, sheds, houses, and bridges. Suitable summer roosting habitat for the Tricolored Bat includes forested habitat where the bats roost in live or dead leaf clusters of deciduous hardwood trees. Roosting can also occur in eastern red cedar, pine needles, and structures such as buildings, barns, sheds, houses, and bridges. Females characteristically return to the same summer roosting locations.

Monarch Butterflies can be found in various habitats where they rely on obligate milkweed (*primarily Asclepias spp.*) as a host plant during the breeding season and as a food source.

4.4.2.2 Migratory Birds

Pursuant to the Migratory Bird Treaty Act of 1918 (16 USC §§703-712), it is illegal to take, possess, import, export, transport, sell, purchase, barter, or offer for sale any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid federal permit. The Bald and Golden Eagle Protection Act (16 USC §668-668c) prohibits anyone, without a permit issued by the Secretary of the Interior, from “taking” bald and golden eagles, including their parts, nests, or eggs.

The IPaC identifies a list of Birds of Conservation Concern that may be affected by the proposed project. Those species are listed below:

- Bald Eagle (*Haliaeetus leucocephalus*)
- Belted Kingfisher (*Megasceryle alcyon*)
- Black-billed Cuckoo (*Coccyzus erythrophthalmus*)

- Blue-winged Warbler (*Vermivora cyanoptera*)
- Bobolink (*Dolichonyx oryzivorus*)
- Canada Warbler (*Cardellina canadensis*)
- Chimney Swift (*Chaetura pelagica*)
- Eastern Meadowlark (*Sturnella magna*)
- Evening Grosbeak (*Coccothraustes vespertinus*)
- Lesser Yellowlegs (*Tringa flavipes*)
- Rose-breasted Grosbeak (*Pheucticus ludovicianus*)
- Wood Thrush (*Hylocichla mustelina*)

4.4.2.3 State Protected Species

Vermont Statute 10, Chapter 123, also known as Vermont's Endangered Species Law, provides legislative policy and definitions related to state-protected species. The Vermont Natural Heritage Inventory identifies 37 state-endangered and 16 state-threatened animal species in addition to 71 state-endangered and 93 state-threatened plant species protected by 10 V.S.A. Chapter 123 (see **Appendix A**). The Vermont ANR maintains the Natural Resources Atlas, which documents the known presence of state-listed species. Review of this resource indicates that no known populations of listed animal or plant species have been found to be present within the DSA.

4.4.2.4 Invasive Species

Executive Order (EO) 13112, *Invasive Species*, directs federal agencies to consider the effects of their actions on invasive species spread, to take practical measures to prevent the introduction of invasive species, and to provide for the restoration of native species and habitat conditions in ecosystems that have been invaded. Subsequently, EO 13751, *Safeguarding the Nation from the Impacts of Invasive Species*, amended the earlier EO 13112 to strengthen coordination and cost effectiveness of the federal efforts to prevent and control invasive species. During the field visit, the presence of vegetation that supports invasive species was not documented. No invasive species were present within the DSA. The DSA is limited to paved surfaces and mowed grass. No further analysis is needed.

4.4.3 Environmental Consequences

Section 7(c) of the ESA requires that potential impacts to rare, threatened, and endangered species of flora and fauna and their critical habitats be identified to avoid adverse impacts to these species. Federally listed species include those designated as threatened, endangered, or candidate species by the USFWS. Impacts on state-listed animals, plants, or significant natural communities must also be assessed. In addition to the IPaC and the ANR Natural Resources Atlas, coordination with the ANR Fish & Wildlife Department was utilized to assess potential impacts to protected species.

4.4.3.1 Significance Threshold

According to FAA Order 1050.1F Desk Reference, a significant impact on biological resources would occur when "The U.S. Fish and Wildlife Service or the National Marine Fisheries Service determines that the action would be likely to jeopardize the continued existence of a Federally listed threatened or endangered species or would result in the destruction or adverse modification

of federally designated critical habitat”. The FAA does not have a significant threshold for non-listed species. FAA Order 1050.1F provides additional guidance on evaluating potential environmental impacts on biological resources, which include:

- A long-term or permanent loss of unlisted plant or wildlife species
- Adverse impacts to special status species (state species of concern, species proposed for listing, migratory birds, bald and golden eagles) or their habitats
- Substantial loss, reduction, degradation, disturbance, or fragmentation of native species’ habitats, mortality (e.g., road kills and hunting), or the ability to sustain the minimum population levels required for population maintenance

4.4.3.2 Alternative 1: No Action Alternative

Under the No Action Alternative, the new facilities would not be constructed, and biological resources and their habitat would remain unaffected.

4.4.3.3 Alternative 2: Construct Terminal Building – Central Location

During the site visit, it was determined that habitat for the Indiana Bat, the NLEB, and the Tricolored Bat is not present within the DSA. As part of the informal consultation process, IPaC determination keys were used to further evaluate potential impacts to federally protected bat species. The Northeast Endangered Species Determination Key evaluates potential impacts on the Indiana Bat. Based on this review, the project has been determined to have “*No Effect*” on the Indiana Bat. The technical assistance letter from the USFWS can be found in **Appendix A**.

The NLEB and Tricolored Bat Range-wide Determination Key was used to evaluate the Sponsor’s Proposed Action’s potential effect on both species. Alternative 2 is “*Not Likely to Adversely Affect*” the NLEB. The technical assistance letter from the USFWS for this determination can be found in **Appendix A**. This determination was confirmed during the field visit as the level of anthropogenic disturbance and the managed grass observed within the DSA indicate that no suitable summer habitat for the NLEB is located within the project area. The Determination Key indicated Alternative 2 “*May Affect*” the tricolored bat. The technical assistance letter from the USFWS for this determination can be found in **Appendix A**. As Alternative 2 does not include any tree removal, the determination of “*May Affect*” is primarily due to the presence of existing forested areas (greater than 10 acres in size) located along Airport Road, the road directly west of the DSA. Since no tree removal is proposed as part of Alternative 2, potential impacts to the Tricolored Bat are not expected. The field visit confirmed that no suitable habitat for this species was identified within the DSA.

The IPaC also identified the Monarch Butterfly as having the potential to occur within the DSA. The DSA consists of paved surface and grass mowed for airport operations. Routine mowing practices limit the growth of milkweed within the DSA. As confirmed during the site visit, the DSA does not include suitable habitat for the Monarch Butterfly.

Additionally, the site visit determined that no suitable habitat exists for grassland nesting birds, woodland nesting birds, or bird species typically associated with aquatic habitats. The existing impervious surface and mowed grass within the DSA do not support plant or animal diversity and do not provide suitable nesting or stopover habitat for any of the migratory bird species of concern. Impacts on migratory bird species, including the Bald Eagle, are not anticipated.

Given that the project would primarily involve construction on previously paved surface and that habitat within the DSA is limited, Alternative 2 would not result in significant impacts to protected species.

4.5 Climate

According to FAA Order 1050.1F, increasing concentrations of greenhouse gases (GHGs) in the atmosphere affect global climate. Carbon dioxide (CO₂) and other GHGs are released into the air when fossil fuels are used to generate electricity, used in furnaces, or used to power aircraft and vehicles. CO₂ makes up the majority of GHG emissions, with lesser contributions from nitrous oxide (N₂O), methane (CH₄), and other compounds such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

4.5.1 Affected Environment

The DSA is contained to Airport property. No buildings or stationary sources of fuel combustion are currently located within the DSA, but mobile sources of GHG emissions, such as on-road vehicles and aircraft, currently operate within it.

Vermont's Act 59, officially known as the Community Resilience and Biodiversity Protection Act, took effect on July 1, 2023. Act 59 aims to conserve biological diversity and maintain a landscape resilient to climate change by conserving intact and connected landscapes. The initial Vermont Conserved Lands Inventory, which was developed in response to Act 59, identifies Natural Resource Management Areas. A Natural Resource Management Area is an area that has permanent protection from conversion but that is subject to long-term, sustainable land management. **Figure 4-3** shows the location of the Natural Resource Management Areas surrounding the project. The Natural Resource Management Area shown northeast of the DSA is publicly owned, while the others adjacent to the project are privately owned.

4.5.2 Environmental Consequences

4.5.2.1 Significance Threshold

As stated in the FAA 1050.1F Desk Reference, "there are no significance threshold for aviation or commercial space launch GHG emissions, nor has the FAA identified specific factors to consider in making a significance determination for GHG emissions." However, it is well-established that GHG emissions can affect the climate. Climate change results from the addition of GHG emissions from millions of individual sources. As such, the FAA has not established a significance threshold for climate and GHG emissions; however, FAA Order 1050.1F guidance states that a discussion of the potential climate impacts should be documented during a NEPA process.

4.5.2.2 Alternative 1: No Action Alternative

The No Action Alternative does not have the potential to impact the Act 59 Natural Resource Management Areas. No additional GHG emissions would be generated during operation as a result of the No Action Alternative. Given that construction would not occur, construction emissions would not be generated. Electric vehicle and aircraft charging stations would not be installed, and the emissions reduction benefits of operating EVs at 6B0 would not be realized.

4.5.2.3 Alternative 2: Construct Terminal Building – Central Location

The Sponsor's Proposed Action does not require conversion of land within a Natural Resource Management Area. Impacts on lands protected by Act 59 would not occur. The Sponsor's Proposed Action requires equipment, such as an excavator, a bulldozer, a paver, and other vehicles and equipment, during construction, which would generate GHG emissions. However, emissions from construction would be temporary and minimal given the size of the facility, the existence of previously paved surface, and the limited need for grading. Once constructed, the 1,800 sq. ft. terminal building would use energy to operate, producing GHG emissions. As part of the Sponsor's Proposed Action, the terminal building would be designed to meet Commercial Building Energy Standards, which include energy efficiency measures. While a new facility would be constructed, significant changes to airport operations would not occur. The terminal and additional project components are being constructed to accommodate existing airport operations. If funding is available, installing electric vehicle and electric aircraft chargers would decrease vehicle and aircraft emissions at 6B0. Significant climate impacts would not occur as a result of the Sponsor's Proposed Action.

4.6 Historical, Architectural, Archaeological, and Cultural Resources

4.6.1 Regulatory Context

Section 106 of the National Historic Preservation Act (NHPA) of 1966 protects properties listed or determined to be eligible for inclusion in the National Register of Historic Places (NRHP). The NHPA requires federal agencies to consider the effects of their undertakings on historic properties and to consult with the State Historic Preservation Office (SHPO) and other parties to develop and evaluate alternatives and modifications to the undertaking that could avoid or minimize potential impacts to historic resources. The Vermont Division for Historic Preservation (VDHP) is the SHPO in Vermont responsible for maintaining historical, archaeological, and cultural resource sites throughout the state. The Section 106 process generally requires four steps:

- **Step 1:** Initiate the 106 process through early coordination with the SHPO and other interested parties (36 CFR§800.3: *Initiation of the Section 106 process*).
- **Step 2:** Identify resources that are listed in or are eligible for listing in the NRHP (36 CFR§ 800.4: *Identification of Historic Properties*)
- **Step 3:** Assess the effects the project will have on eligible or listed properties (36 CFR§800.5: *Assessment of Adverse Effects*)
- **Step 4:** Resolve adverse effects in consultation with the SHPO and, if necessary, the Advisory Council on Historic Preservation (36 CFR§800.6, *Resolution of Adverse Effects*)

4.6.2 Affected Environment

4.6.2.1 Area of Potential Effect

To consider the effect an undertaking may have on properties listed or eligible for listing on the NRHP, an Area of Potential Effect (APE) must first be identified. As defined by 36 CFR Part 800.16(d), the APE is the geographic area or areas within which an undertaking may directly or indirectly alter the character or use of historic properties. Such changes may include physical destruction, damage, or alteration of a property; change in the character of the property's use or of physical features within its setting that contribute to its historic significance; and/or introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features [36 CFR 800.5(a)(2)].

The direct APE for the project has been limited to the area subject to potential ground disturbance. This area is synonymous with the DSA. An indirect APE was developed to assess potential indirect impacts to above-ground resources within the viewshed of the proposed terminal building. **Figure 4-4** shows the direct and indirect APE for the project.

4.6.2.2 Archeological Resources

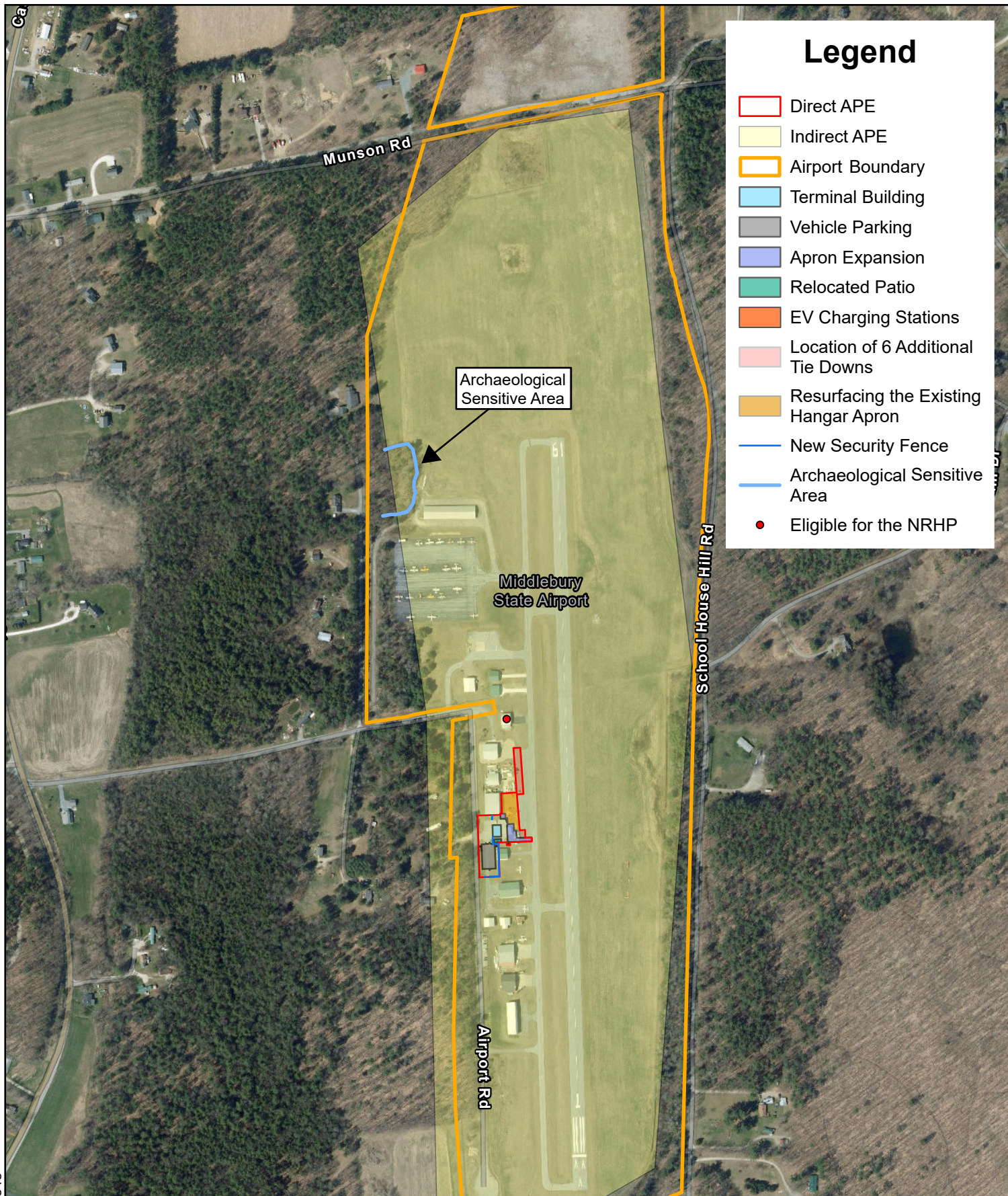
A VTrans Archaeology Officer reviewed the project's APE and recommended no further archaeological investigation based on evidence of extensive development and landform alterations associated with the construction of roadways, a surface parking lot, and apron area within the direct APE. Therefore, an Archeological Resource Assessment (ARA) was not completed as part of this project.

Northeast Archaeology Research Center, Inc. (NE Archaeology) completed archaeological phase II testing of Native American archaeological site VT-AD-1359 in October of 2021 as part of the Section 106 review process for a previous project, the Middlebury Airport Master Planning Project. An Archaeological Sensitive Area (ASA) in which Native American artifacts were recovered is located within the forested area west of the northern-most hangar at the Airport. The location of this ASA is shown in **Figure 4-4**. This ASA is off Airport property and is approximately 0.25 miles north of the DSA. The End of Field Letter from the phase II testing is included in **Appendix B** and states that it is considered unlikely that the site meets eligibility criteria for the NRHP. While this area is outside of the direct and indirect APE, this area is noted and taken into consideration in the context of the project.

4.6.2.3 Historic Architecture

Review of the NRHP spatial database indicates that no known NRHP-listed resources are within the APE. A Historic Resource Review was conducted at 6B0 in April 2017 in reference to a prior fencing project at the Airport. The review assessed above-ground resources at the Airport and their eligibility for listing on the NRHP. At the time of the review, 10 of the 14 structures were less than 50 years old. Therefore, only 4 structures were evaluated at the time to determine their potential eligibility for the NRHP. The review concluded that these structures did not possess characteristics to be considered eligible for the NRHP. The 2017 Historic Resource Review is found in **Appendix B**.

To supplement this Historic Resource Review, Hartgen Archeological Associates, Inc. (Hartgen) completed a Historic Resources Identification Assessment for the New Terminal Building APE. A site visit was conducted on June 11, 2025. A total of 18 resources were surveyed. One resource, known as Box Hangar #5, was determined to be eligible for the NRHP under Criteria A and Criteria C. It illustrates Vermont's pioneering role in mid-20th century air transport by embodying key hallmarks of hangar design from that era. Its exposed steel frame, corrugated-metal siding, and bowstring-truss roof demonstrate postwar advances in prefabrication and the functionalist aesthetic. This resource maintains its original form, materials, and workmanship, preserving a tangible record of Vermont's public-works aviation facilities of the mid-20th century. This hangar is the fourth hangar north of the proposed location of the new terminal building. It is located approximately 80 feet north of the DSA and 400 feet north of the location of the new terminal building (see **Figure 4-4**). The 2025 Historic Resource Identification Assessment can be found in **Appendix B**.



Legend

- Direct APE
- Indirect APE
- Airport Boundary
- Terminal Building
- Vehicle Parking
- Apron Expansion
- Relocated Patio
- EV Charging Stations
- Location of 6 Additional Tie Downs
- Resurfacing the Existing Hangar Apron
- New Security Fence
- Archaeological Sensitive Area
- Eligible for the NRHP



1" = 550'

CHA No.
087308

Figure 4-4: Historic & Cultural Resources

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan, Hartgen

4.6.3 Environmental Consequences

Adverse effects on historic and cultural resources are evaluated and determined through the Section 106 consultation process. Examples of adverse effects include physical destruction of a resource, damage, or alteration of a resource; removal of the property from its historic location; change of the character of the property's use or physical features within the property's settings; or an introduction of visual or audible elements that diminish the integrity of the property's significant historic features. The methodology for assessing the effects the proposed action might have on NRHP-listed or eligible resources is that of 36 CFR 800.5 *Assessment of Adverse Effects*.

4.6.3.1 Significance Threshold

According to FAA Order 1050.1F, the FAA does not have a threshold for significant impacts for this resource category; however, it has identified factors to consider when evaluating the "context and intensity" of potential impacts. "Factors include, but are not limited to, situations in which the proposed action or alternative(s) would result in a finding of Adverse Effect through the Section 106 process."

4.6.3.2 Alternative 1: No Action Alternative

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

4.6.3.3 Alternative 2: Construct Terminal Building – Central Location

Coordination with the VDHP was initiated on December 18, 2024 when CHA Consulting, Inc., on behalf of the FAA, sent a letter describing the project to the VDHP (see **Appendix B**). Given that the area is highly disturbed from previous airport development, below ground resources are not expected to be present, and impacts are not anticipated. The Historic Resource Assessment conducted in June 2025 determined that a hangar located within the APE (Box Hangar #5) was eligible for the NRHP. The new terminal building and associated facilities would be consistent with current development at the Airport and would not impact the integrity of the resource. Pursuant to 36 CFR 800.5, the FAA issued a No Adverse Effect finding, which was submitted to the VDHP for 30-day review and comment on October 28, 2025. The Section 106 No Adverse Effect documentation [36 CFR 800.11(e)] was accepted by VDHP on November 25, 2025 (see **Appendix B**).

4.7 Department of Transportation Act, Section 4(f) Resources

4.7.1 Regulatory Context

Section 4(f) of the U.S. Department of Transportation (DOT) Act of 1996 [recodified in 1983 as Title 49, Section 303(c) of the USC] provides for the protection of publicly owned recreational resources and requires the analysis of potential impacts to these resources arising from U.S. DOT actions. Resources protected under Section 4(f) include public parks and recreation areas, as well as wildlife and waterfowl refuges or management areas of national, state, or local significance. Section 4(f) also applies to historic sites of national, state, or local significance as determined by the official who has jurisdiction over these historic resources. Such sites include those that are listed or eligible for inclusion in the NRHP, as well as those identified by appropriate state or local agencies as having historic significance.

4.7.2 Affected Environment

4.7.2.1 Public Parks & Recreation Areas

A review of the U.S. Department of Agriculture Interactive Visitor Forest Map shows that the northern portion of the Airport and the land directly east of the Airport is within the Green Mountain National Forest (see **Figure 4-5**). This forest is the only federally managed National Forest in Vermont. However, the boundary shown in **Figure 4-5** is the administrative boundary. The U.S. Forest Service is the administrator of the Green Mountain National Forest. The portion of Airport property within this administrative boundary is not forested and is not maintained as part of the Green Mountain National Forest. It is maintained for airport operations.

Review of available online resources from the USFWS and the VT ANR Natural Resources Atlas indicate that no wildlife or waterfowl refuges are located in or near the DSA. Further review of Town of Middlebury, Addison County, and Vermont State Parks online resources indicates that no other publicly owned parks or recreation areas are located within the GSA.

4.7.2.2 Historic Sites

A Historic Resource Identification Assessment was conducted at 6B0 in June 2025 which determined that one hangar (Box Hangar #5) is eligible for the NRHP (see **Appendix B**). **Figure 4-4** shows the location of Box Hangar #5.

4.7.3 Environmental Consequences

4.7.3.1 Significance Threshold

FAA Order 1050.1F provides the FAA's significance threshold for Section 4(f) properties. A significant impact would occur when: *The action involves more than a minimal physical use of a Section 4(f) resource or constitutes a "constructive use" based on an FAA determination that the aviation project would substantially impair the Section 4(f) resource.* An action would "use" a 4(f) resource in two ways: physical or constructive.

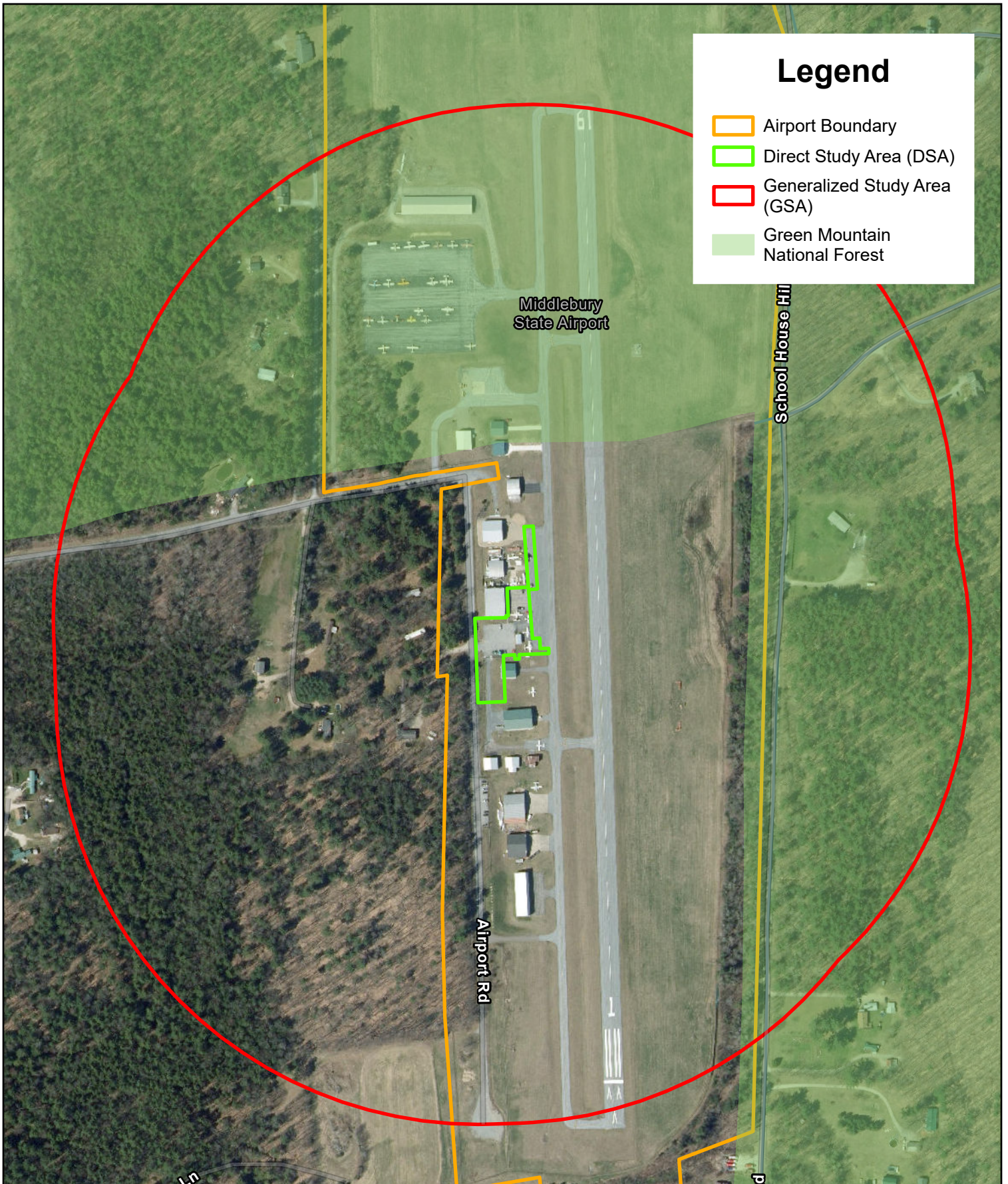
- **Physical Use:** The action would physically occupy and directly use the Section 4(f) resource. A physical taking of Section 4(f) property through the purchase of land or a permanent easement, physical occupation of a portion or all the property, or alteration of structures or facilities on the property would classify as a "use"
- **Constructive Use:** The action indirectly uses a Section 4(f) resource by substantially impairing the resource's intended use, features, or attributes.

4.7.3.2 Alternative 1: No Action Alternative

Under the No Action Alternative, the new terminal building and associated facilities would not be constructed. The No Action Alternative does not have the potential to directly or indirectly impact Section 4(f) resources.

4.7.3.3 Alternative 2: Construct Terminal Building – Central Location

There are no Section 4(f) sites located within the DSA; therefore, physical use of a Section 4(f) resource would not occur if Alternative 2 is implemented. While the Green Mountain National Forest is within the GSA, new facilities constructed would be consistent with existing airport development and are not expected to impair the use or character of the Green Mountain National Forest. Additionally, the FAA issued a No Adverse Effect finding on October 28, 2025 indicating



1" = 400'

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Figure 4-5: Green Mountain National Forest

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan, USDA

that the Sponsor's Proposed Action would have No Adverse Effect on Section 4(f) historic resources. The No Adverse Effect documentation was accepted by VDHP on November 25, 2025 (see **Appendix B**). Significant impacts to Section 4(f) resources would not occur as a result of the Sponsor's Proposed Action.

4.8 Section 6(f) Resources

4.8.1 Regulatory Context

The U.S. Land and Water Conservation Fund Act of 1965 established the Land and Water Conservation Fund (LWCF), which was created to preserve, develop, and assure accessibility to outdoor recreational resources. Section 6(f) of this Act prohibits conversion of lands purchased with LWCF monies to a non-recreational use.

4.8.2 Affected Environment

The LWCF website indicates that the Green Mountain National Forest is a Section 6(f) resource. No other Section 6(f) resources are located within the vicinity of the project.

4.8.3 Environmental Consequences

4.8.3.1 Significance Threshold

The FAA has not established a significance threshold, but the FAA must comply with Section 6(f) of the LWCF. Section 6(f) requires that areas funded through the LWCF program remain for public outdoor recreation use or be replaced by lands of equal value, location, and recreation usefulness.

4.8.3.2 Alternative 1: No Action Alternative

The No Action Alternative does not have the potential to affect Section 6(f) resources.

4.8.3.3 Alternative 2: Construct Terminal Building – Central Location

The Sponsor's Proposed Action would not require the acquisition of land within the Green Mountain National Forest; therefore, Section 6(f) resources would not be impacted.

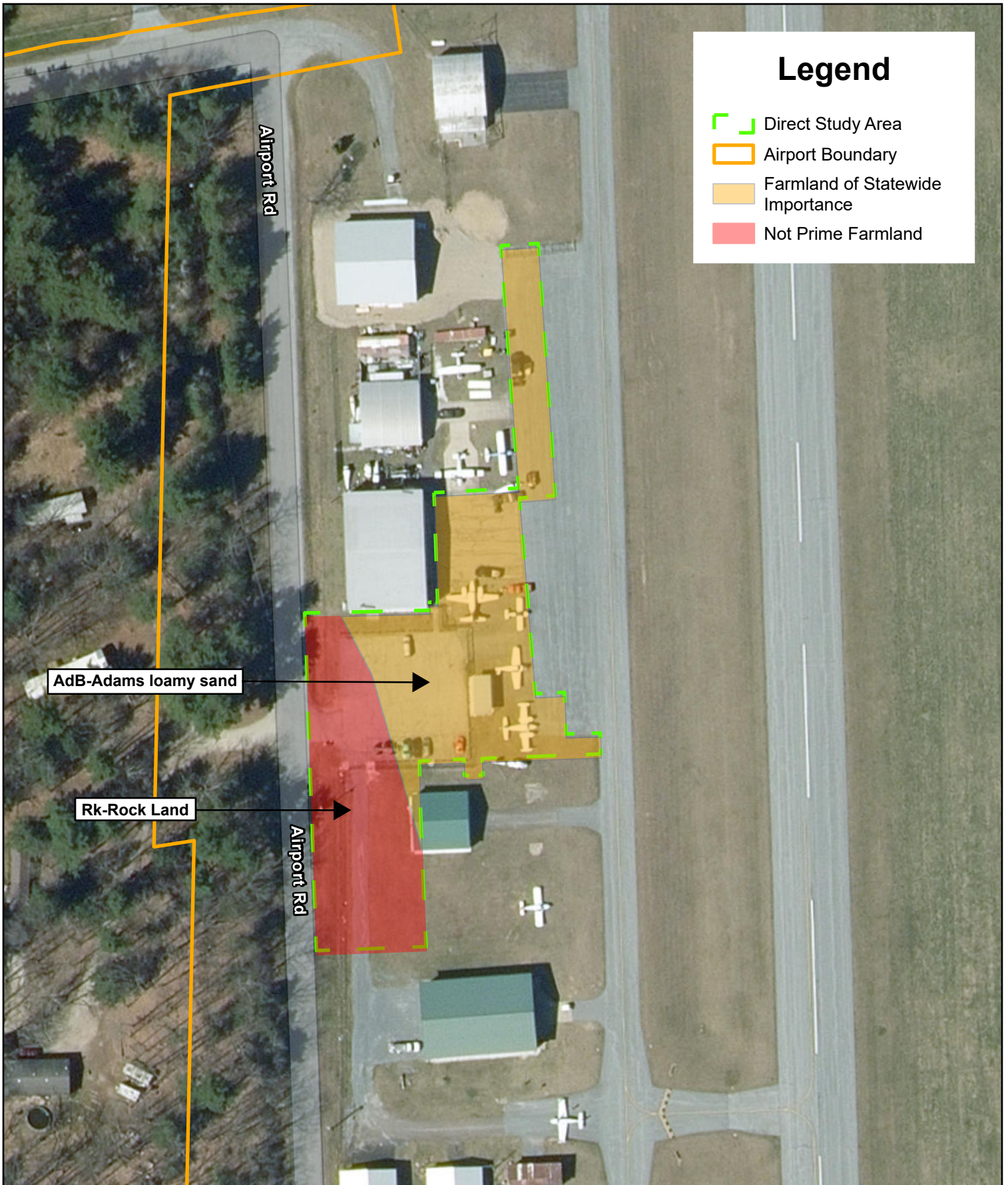
4.9 Farmlands

4.9.1 Regulatory Context

The Farmland Protection Policy Act (FPPA) (7 USC 4201-4209) of 1984 was implemented to protect and preserve farmland for agricultural use as part of the 1980 Farm Bill (PL 97-98, Title XV, Subtitle I; 7 USC 4201-4209). The guidelines recognize that the quality of farmland varies based on soil conditions and place a higher value on soils with high productivity potential. To preserve these highly productive soils, the Natural Resource Conservation Service (NRCS) classifies soil types as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. The NRCS requires that soils in these categories be given proper consideration before they are converted to non-farming uses by federal programs.

4.9.2 Affected Environment

According to the NRCS Web Soil Survey for Addison County, soil types identified as farmland of statewide importance are mapped within the DSA (see **Figure 4-6**). Soil types and farmland classifications of soils within the study area are shown below in **Table 4-2**.



Legend

- ┌┐ Direct Study Area
- Airport Boundary
- Farmland of Statewide Importance
- Not Prime Farmland

	 		Figure 4-6: Farmland Soils Middlebury State Airport Middlebury, VT
	1' = 100"	CHA No. 087308	Source Data Middlebury State Airport (6B0) Master Plan, USDA

Table 4-2. Farmland Soils within the Direct Study Area

Soil name	Symbol	Rating
Adams loamy sand, 0 to 8 percent slopes	AdB	Farmland of Statewide Importance
Rock land	Rk	Not Prime Farmland

4.9.3 Environmental Consequences

According to the FAA Order 1050.1F Desk Reference, the FPPA and its implementing regulations (7 CFR § 657.5) define prime, unique, statewide, and locally important farmlands as follows:

- **Prime Farmland:** Farmland with the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops
- **Unique Farmland:** Farmland that is classified as producing high-value food and fiber crops
- **Statewide and Locally Important Farmland:** Farmland designated as “important” by either a state government, county commissioners, or an equivalent elected body.

However, this policy does not apply to land already committed to urban development or water storage, regardless of its importance as defined by the NRCS.

4.9.3.1 Significance Threshold

According to FAA Order 1050.1F, the FAA’s significance threshold for farmlands occurs when the total combined score on Form AD-1006: *Farmland Conversion Impact Rating* ranges between 200 and 260 points. The potential for a proposed action or alternative to convert important farmlands to non-agricultural use should also be considered.

4.9.3.2 Alternative 1: No Action Alternative

The No-Action Alternative would not impact prime, unique, or statewide-important soils.

4.9.3.3 Alternative 2: Construct Terminal Building – Central Location

Alternative 2 would not convert any land currently used for agricultural production to non-agricultural use or impact areas being farmed. The DSA does contain soils mapped as farmland of statewide importance. However, this site area consists almost entirely of paved surfaces, and the proposed improvements are entirely within Airport property on lands committed to urban development. Alternative 2 would not have a significant impact on farmland.

4.10 Hazardous Materials, Solid Waste, & Pollution Prevention

4.10.1 Regulatory Context

Hazardous materials, including hazardous wastes and hazardous substances, petroleum, and natural gas substances and materials, may present a risk to human health and the environment. Hazardous and solid waste is regulated under federal law by the Resource Conservation and Recovery Act (RCRA). RCRA established the framework for properly generating, storing, treating, and disposing of hazardous and non-hazardous solid waste to prevent potential threats to human health and the environment. RCRA also regulates new products (e.g., fuels) and waste materials

stored in underground storage tanks (USTs). The EPA or a state agency may pursue a RCRA Corrective Action at operating facilities where improperly managed hazardous waste was released or threatened to be released. For abandoned, uncontrolled, hazardous waste sites, the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) establishes liability, including emergency remediation costs, for those parties determined to be responsible and establishes a fund to pay for the cleanup sites. CERCLA also directed the EPA to create a National Priorities List (NPL) of Superfund sites or sites prioritized by known or threatened releases of hazardous substances, pollutants, or contaminants into the environment. The NPL includes the most serious uncontrolled or abandoned hazardous waste sites in the U.S.

4.10.2 Affected Environment

A review of online environmental databases was conducted to identify sites and facilities within the GSA that may be of environmental concern from both a site contamination and a NEPA perspective. The review included various online databases maintained by the EPA and state agencies. Resources that were reviewed include the following:

- Vermont ANR Natural Resources Atlas
- EPA National Priorities List
- EPA Cleanups in my Community
- EPA Enforcement and Compliance History Online (ECHO)
- EPA UST Finder
- EPA NEPAAssist

The NPL contains the most serious uncontrolled or abandoned hazardous waste sites throughout the United States. There are no NPL sites within the GSA. Brownfield sites, defined as properties whose reuse may be complicated by the potential presence of hazardous substances, pollutants, or contaminants, are not found within the GSA.

A review of the EPA UST Finder identified three USTs within the GSA, which have all been removed. One was identified online as active, and two were identified as inactive. The inactive USTs were both 8,000-gallon tanks previously located at the Airport but were removed. One of these tanks contained gasoline, and the other contained aviation fuel. The UST identified as active (facility ID VT1406) is a 10,000-gallon tank containing aviation fuel. This tank was previously located under the Fueling Apron. This tank has been removed.

The EPA's NEPAAssist website identifies two RCRA reporting facilities within the project's vicinity. One facility, operated by Dustaire, Inc., is shown on the NEPAAssist tool within the DSA. The second facility, operated by Mount Abraham Union High School, is shown within the GSA approximately 0.2 miles west of the DSA. According to the ECHO Detailed Facility Report, both RCRA sites are inactive.

In general, municipal solid waste (MSW) is generated by operational activities at 6B0 and is hauled to a nearby landfill for disposal.

4.10.3 Environmental Consequences

4.10.3.1 Significance Threshold

The FAA has not established a significance threshold for hazardous materials, solid waste, or pollution prevention; however, an effect on any of the listed criteria below would indicate a potential for significant adverse effect:

- Violate applicable federal, state, tribal, or local laws or regulations regarding hazardous materials and/or solid waste management.
- Involve a contaminated site
- Produce an appreciably different quantity or type of hazardous waste
- Generate an appreciably different quantity or type of solid waste or use a different method of collection or disposal and/or would exceed local capacity; or
- Adversely affects human health and the environment.

4.10.3.2 Alternative 1: No Action Alternative

Under the No Action Alternative, sources of waste, both solid and hazardous, would remain unchanged. Impacts on hazardous materials would not occur.

4.10.3.3 Alternative 2: Construct Terminal Building – Central Location

The evaluations below consider encountering existing hazardous waste, using hazardous materials, generating hazardous and solid waste, and implementing potential pollution prevention.

Hazardous Materials

Alternative 2 would not violate regulations, involve a known contaminated site, produce hazardous waste, generate a different type or quantity of solid waste, use a different collection method, or exceed local capacity. It would also not adversely affect human health and the environment. No known areas of concern with the potential to encounter hazardous materials or contaminated subsurface media exist within the DSA.

Solid Waste

Solid waste, including construction and demolition debris and non-hazardous waste, would be generated from the demolition of existing pavements and minor structures. Contractors working on the site would be required to remove and properly dispose of all waste materials that may result from construction activities. Solid waste generated during construction would be transported and recycled or disposed of as directed by the appropriate authorities. Waste would be managed and disposed of in accordance with federal, state, and local regulations. Upon completion of construction, the generation of municipal solid waste is not expected to be significant. The solid waste associated with Alternative 2 is not expected to exceed local or regional landfill capacities.

Pollution Prevention

Potential pollutants could be released into the environment during demolition, construction, and operation of Alternative 2. If ground disturbance exceeds one acre during construction, a Stormwater Pollution Prevention Plan (SWPPP) for construction activities would be developed and approved prior to construction. If a contractor plans to store fuel or other oils on site during construction in sufficient quantities, they would be required to prepare and fully implement a Spill Prevention, Control, and Countermeasure (SPCC) plan to prevent, respond to, and clean up spills. The Airport currently has an approved stormwater permit, airport SWPPP, and airport

SPCC plan. Upon completion of Alternative 2, the Airport would incorporate the infrastructure improvements into its SPCC plan (if applicable) and SWPPP and address pollution prevention through stormwater management, proper storage of materials, good housekeeping practices, and implementation of applicable stormwater best management practices (BMPs) for maintenance activities.

Based on the information presented above, hazardous materials or solid waste would not have significant impacts, and proper pollution prevention would be in place during construction and operation.

4.11 Land Use

4.11.1 Regulatory Context

Pursuant to Title 49 U.S.C. 47106(a)(1), airport sponsors are required to provide assurances that a proposed action is consistent with existing land use plans. The regulations recognize that certain inconsistencies between the proposed federal action and any approved state or local plan or law may exist. Where an inconsistency exists, the NEPA document should describe the extent to which the agency would reconcile its action.

The designation of zoning or land use districts for different types and intensities of uses is intended to regulate the location and density of development. Potential impacts from airport actions that may affect land use compatibility are disruption of communities, relocation of residences and businesses, and induced socio-economic impacts.

4.11.2 Affected Environment

The Town of Middlebury Planning/Zoning Map indicates that the DSA is zoned as Airport (AIR) District. The GSA is primarily designated as AIR, Agricultural/Rural District (AR), and Forest District (FOR). AIR zoning designations seek to ensure aviation safety by limiting the height and type of structure in the given proximity. The purpose of the AR district is to maintain the character and agricultural viability of the present rural and agricultural areas of the Town. This district includes rural residential properties, but the predominant land uses are agricultural, forestry, and earth resource extraction. Development in the FOR district is limited by topography, natural resources, aquifer/wellhead protection, wetlands, wildlife habitats, and/or poor access.

4.11.3 Environmental Consequences

The assessment of potential land use and planning effects of the No-Action Alternative and the Sponsor's Proposed Action focuses on identifying applicable federal, regional, state, and local land use plans and policies and assessing the alternatives' consistency with these plans and policies. Where an inconsistency exists, the NEPA document should describe the extent to which the agency (FAA) would reconcile its actions.

4.11.3.1 Significance Threshold

The FAA has not established a significance threshold for land use, and the FAA has not provided specific factors to consider in making a significance determination for land use. An inconsistency with surrounding land uses and zoning by itself does not automatically result in a significant impact. The determination that significant impacts exist in the land use impact category is normally dependent on the significance of other impacts. The compatibility of a proposed action's existing and planned land uses is usually associated with noise impacts. In addition to the impacts of noise

on land use compatibility, other potential impacts of FAA actions may also affect land use compatibility, such as disruption or relocation of communities, induced socioeconomic impacts, or land uses protected under Section 4(f) of the U.S. DOT Act.

4.11.3.2 Alternative 1: No Action Alternative

Under the No Action Alternative, the land use in or around the DSA would not change, and land use impacts would not occur.

4.11.3.3 Alternative 2: Construct Terminal Building – Central Location

The proposed project would be contained on Airport property and be compatible with existing and future development at 6B0, as outlined in the Master Plan. Construction of a new terminal building and other facilities would not create land use incompatibilities or be inconsistent with off-Airport land use plans. Additionally, the project would not create a new wildlife attractant or create an obstruction to navigational airspace per 14 CFR Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace*. Therefore, Alternative 2 would be consistent with land use designations in and around the DSA and would not cause significant land use impacts.

4.12 Natural Resources & Energy Supply

4.12.1 Regulatory Context

According to the FAA Order 1050.1F *Desk Reference*, the NEPA documentation should include an evaluation of a project's consumption of natural resources and use of energy supplies that may occur during construction, operation, and/or maintenance.

4.12.2 Affected Environment

Airport operations require energy to power, cool, heat, and provide lighting. The energy requirements associated with airport development generally fall into two categories: those for stationary facilities (terminal and other buildings) and those for aircraft operations. Stationary facilities use utility energy (electric energy and natural gas) to provide lighting, cooling, heat, and hot water to buildings, airfields, and parking areas. Aircraft operations consume fuel to operate the aircraft and power ground support equipment that service the aircraft. Natural resources, such as sand, gravel, water, wood, concrete, asphalt, and steel, are typically used during airport construction projects. Green Mountain Power provides electricity to 6B0. The nearest 3-phase power is currently extended aboveground to State Route 113, adjacent to the Airport.

4.12.3 Environmental Consequences

4.12.3.1 Significance Threshold

FAA Order 1050.1F does not establish a significance threshold for natural resources or energy supply. Normally, an impact would be considered significant when the construction or operation of a proposed action causes the demand for limited consumable natural resources and energy to exceed available or future supplies.

4.12.3.2 Alternative 1: No Action Alternative

Under the No Action Alternative, the Sponsor's Proposed Action would not occur, and natural resources or energy would not be used for construction. Current energy use at the Airport would remain unchanged.

4.12.3.3 Alternative 2: Construct Terminal Building – Central Location

As part of Alternative 2, natural resources, such as sand, gravel, and steel, in addition to energy use, would be necessary to construct the new airport facilities. This use of natural resources and energy would be temporary and minimal, and it is not expected to impact natural resources or energy supply.

During operation, the new terminal building would use energy, requiring the extension of existing utilities. The terminal building design would be consistent with the State of Vermont's Department of Public Service Commercial Building Energy Standards, which include energy conservation measures. If funding is available for EV chargers, 3-phase power would be extended to the DSA from State Route 113. While the Sponsor's Proposed Action would result in an increase in natural resource and energy use during construction and operation, significant impacts to natural resources or energy supply are not anticipated.

4.13 Noise & Land Use Compatibility

4.13.1 Regulatory Context

The FAA utilizes 14 CFR Part 150: *Airport Noise Compatibility Planning's* land use compatibility guidelines to determine compatibility with most land uses. These guidelines are consistent with land use compatibility guidelines developed by other federal agencies, such as the USEPA and the United States Department of Housing and Urban Development. The analysis of the local development of airport plans, noise compatibility policies, and the development of plans are regulated by FAA laws and regulations, including the *Aviation Safety and Noise Abatement Act of 1979* (Title 49 U.S.C. 47501 et seq.) and the *Airport and Airway Improvement Act of 1982* (49 U.S.C. 47101 et seq.). FAA Order 1050.1F provides the FAA's policies and procedures to ensure agency compliance with NEPA.

4.13.2 Affected Environment

To evaluate aircraft noise, the FAA has an approved computer model, the Airport Environmental Design Tool (AEDT), that simulates aircraft activity at an airport. AEDT first defines a network of reference points to measure noise at ground level around the airport. Flight tracks and aircraft performance profiles are created within the program based on operational conditions. AEDT then selects the shortest distance from each flight track to each reference point and computes the noise exposure generated by each aircraft operation. Adjustments are applied for airport climate and environmental characteristics, atmospheric acoustic attenuation, aircraft thrust variations, and time of operation. Night-time operations, those occurring between the hours of 10:00 p.m. and 7:00 a.m., are attributed a 10-decibel penalty (perceived as twice as loud).

The noise exposure levels for each aircraft are then summed at each reference point to provide a day-night average noise level (DNL). DNL is a 24-hour logarithmic average sound level expressed in A-weighted decibels (dBA), as approved by the FAA. The cumulative noise exposure levels at all reference points are then used to plot noise exposure contours for selected DNL values and superimposed onto a base map. Noise contours generated by the AEDT represent outdoor noise levels and depict generally expected average daily noise exposure at a relative location rather than noise levels for a single aircraft event. Noise exposure on any one day may be greater or less than the average day. A DNL of 65 dBA is the noise level at which noise-sensitive land uses (residences, churches, schools, libraries, and nursing homes) become significantly impacted. According to the FAA guidelines, below DNL 65 dBA, all land uses are determined to be compatible with airport noise.

Normally, a noise analysis assesses the effects of airport development having the potential to cause aircraft noise outside the airport's boundaries. A noise analysis is not required for most actions if the DNL 65 dBA contour lies entirely within the airport boundaries. According to VTrans, no aircraft noise analysis has been completed for 6B0. Based on the fleet mix utilizing the Airport (less than 700 annual jet operations), the total annual operations (6,350), and a lack of non-compatible land uses in the vicinity of the 6B0, an aircraft noise analysis was not completed.

4.13.3 Environmental Consequences

4.13.3.1 Significance Threshold

A significant impact on noise would occur when the action increases noise by DNL 1.5 dB or more for a noise-sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the no-action alternative for the same timeframe.

Noise-sensitive areas in Section 4(f) properties need special considerations when evaluating the significance of noise impacts. Examples include, but are not limited to, noise-sensitive areas within national parks; national wildlife and waterfowl refuges; and historic sites, including traditional cultural properties, where the land use compatibility guidelines in 14 CFR part 150 are not relevant to the value, significance, and enjoyment of the area in question.

4.13.3.2 Alternative 1: No Action Alternative

Under the No Action Alternative, noise levels would remain unchanged. Impacts from aircraft or construction noise would not occur.

4.13.3.3 Alternative 2: Construct Terminal Building – Central Location

The Sponsor's Proposed Action is intended to accommodate existing aircraft operations at 6B0. A noise analysis assesses the effects of airport development having the potential to cause aircraft noise outside the airport's boundaries. Given that the Sponsor's Proposed Action would not increase or alter daily airport operations or change the fleet mix, noise contours are expected to remain unchanged, and a noise analysis was not conducted.

As with any construction project, construction equipment and construction traffic would temporarily generate noise. Noise levels and potential adverse effects due to construction activities would vary depending on equipment type and duration of operation. Noise levels generated by typical construction equipment are shown in **Table 4-3**. For comparison, **Table 4-4** shows noise levels generated by common sources.

Table 4-3. Noise Levels of Typical Construction Equipment

Equipment	Typical Noise Levels (dBA at 50 feet)
Front Loader	85
Backhoe, Excavator	80-85
Tractors, Dozers	83-89
Graders, Scrapers	85-89
Trucks	88
Cranes	83-88

Jack Hammer, Rock Drills	98
Compactors	82

Source: FHWA Construction Noise Handbook

Table 4-4. Common Noise Levels

Noise Source	Noise Levels (dBA)
Jet Aircraft (at 300 ft.)	130
Rock and Roll Concert	110
Pneumatic Chipper	110
Chainsaw	90
Heavy Truck Traffic	80
Business Office	70
Conversational Speech	60
Library	50
Secluded Woods	30
Whisper	20

Source: CHA, 2025

Nearby residential areas could experience short-term noise impacts when the Sponsor's Proposed Action is under construction. However, noise from construction would be temporary. All construction equipment and vehicles would be properly maintained, equipped with functional mufflers, and tuned to minimize the potential for noise. Upon project completion, noise levels would return to pre-existing conditions in the area. No significant adverse impacts are anticipated.

4.14 Socioeconomics & Children's Health and Safety

4.14.1 Regulatory Context

Socioeconomics, with respect to NEPA, is used to describe aspects of a project that are either social or economic in nature. All federal agencies should conduct a socioeconomic analysis if economic and/or social effects relate to other environmental resource categories because of the Proposed Action and alternative(s). This analysis would include an evaluation of how elements of the human environment, such as population, employment, housing, and public services, may be impacted. If the acquisition of real property or the displacement of people would occur because of the Proposed Action, the standards contained in the Uniform Relocation Assistance and Real Property Acquisitions Policy Act of 1970, 42 U.S.C. § 61 et seq., and implementing regulations found at Title 49 CFR Part 24 would be implemented.

As stated previously, pursuant to the January 29, 2025, US DOT memorandum "*Implementation of Executive Orders Addressing Energy Climate Change Diversity and Gender*," the EA will not include low-income or minority population analysis as Executive Order 12898: *Federal Actions to Address EJ in Minority and Low-Income Populations* and Executive Order 14096: *Revitalizing our Nation's Commitment to EJ for All* were canceled on January 20, 2025. EO 13045 directs federal agencies to analyze their policies, programs, activities, and standards for any environmental health or safety risks that may disproportionately affect children.

4.14.2 Affected Environment

4.14.3 Socioeconomics

The DSA is contained to Airport property and does not contain a residential population. Statistical data from the U.S. Census Bureau 2023 American Community Survey (ACS) 5-Year Estimates for Addison County is shown in **Table 4-5** below:

Table 4-5. U.S. Census Bureau Statistics

	Population Size	Median Income	Population Under 18 Years Old
Addison County	37,497	\$40,412	16.2%

Source: U.S. Census Bureau 2023: American Community Survey 5-Year Estimates

4.14.4 Children's Environmental Health & Safety Risk

Children's facilities, such as schools, daycares, and parks, are not found within the GSA.

4.14.5 Environmental Consequences

4.14.5.1 Significance Threshold

Socioeconomic Impacts

The FAA has not established a significant threshold for socioeconomics; however, in general, the significance of socioeconomic impacts is determined by the magnitude and duration of the impacts, whether beneficial or adverse. According to FAA Order 1050.1F, potential impacts to consider include:

- Causing extensive relocation of housing when sufficient replacement housing is unavailable.
- Dividing or disrupting an established community.
- Causing extensive relocation of businesses would cause economic hardship.
- Disrupting local traffic patterns and substantially reducing the levels of service of roads serving an airport and its surrounding communities.
- Producing a substantial loss of the community tax base.

Children's Environmental Health & Safety Risks

The FAA has not established a significant threshold for children's environmental health and safety risks. However, potential impacts from other environmental categories should be assessed to determine if they can lead to a disproportionate health or safety risk to children.

4.14.5.2 Alternative 1: No Action Alternative

The No Action Alternative would result in no new development. This alternative would result in no economic impact, including the modest beneficial impact of job creation during construction. It would also avoid disruptions to established communities, businesses, and residential areas. Abstaining from rehabilitation of the apron area could present a safety hazard if decaying pavement produces Foreign Object Debris (FOD) that damages an aircraft. This would create a safety issue for all communities surrounding 6B0. No other health and safety risks would occur, including health and safety risks that would affect children.

4.14.5.3 Alternative 2: Construct Terminal Building – Central Location

Socioeconomics

The Sponsor's Proposed Action would result in a temporary growth of economic activity in the area during construction. However, given that the new facilities are meant to accommodate existing operations at 6B0, economic activity in the area is not expected to be significantly altered by the project. The Sponsor's Proposed Action would not disrupt communities near 6B0, as the entire project would be contained to Airport property and would not necessitate the relocation or displacement of residential populations or businesses. Significant socioeconomic impacts are not anticipated.

Children's Environmental Health and Safety Risks

The Sponsor's Proposed Action would not result in environmental health and safety risks. Furthermore, the project would not create or make more readily available products or substances that could harm children by contact or ingestion through the air, food, drinking water, recreational waters, or soil. Therefore, the project would not result in any significant impacts on children's health or safety.

4.15 Visual Effects

4.15.1 Regulatory Context

According to FAA Order 1050.1F, the FAA must evaluate visual effects to federal, state, or local scenic roadways/byways; Wild and Scenic Rivers; National Scenic Areas; protected rails; and biological resources; and features protected under other federal, state, or local regulations. Laws protecting resources that may be affected by visual effects include Section 106 of the NHPA, Section 4(f) of the DOT Act, the Wild and Scenic Rivers Act, and the Coastal Zone Management Act. In addition, state and local regulations, policies, and zoning ordinances may apply to visual effects. According to 1050.1F Desk Reference Chapter 13 (Visual Effects), visual effects are broken into two categories: (1) light emissions and (2) visual resources and visual character.

4.15.2 Affected Environment

4.15.3 Light Emissions

According to 1050.1F Desk Reference, light emissions include any light that emanates from a light source into the surrounding environment. At 6B0, these include airfield and apron flood lighting, navigational aids, parking facility lighting, and roadway lighting. Most of the Airport is surrounded by trees, which provide a barrier that blocks light emissions from nearby residences.

4.15.4 Visual Resources and Character

Visual resources include buildings, sites, traditional cultural properties, and other natural or manmade landscape features that are visually important or have unique characteristics. A desktop investigation into these categories identified the Green Mountain National Forest as the only visual resource within the GSA. The Green Mountain National Forest borders the Airport to the east.

Visual character refers to the overall visual makeup of the existing environment where the proposed action would be located. In general, the visual character of the study area can be classified as follows:

- Densely vegetated residential areas
- Densely vegetated natural areas
- Sparsely vegetated Airport property
- Roadways and other paved surfaces
- View of the DSA is limited by topography and vegetation in the area.

4.15.5 Environmental Consequences

4.15.5.1 Significance Threshold

According to FAA Order 1050.1F, the FAA must evaluate the Proposed Project Modification's visual effects. According to 1050.1F Desk Reference Chapter 13 (Visual Effects), visual effects are broken into two categories: (1) light emissions and (2) visual resources and visual character. The FAA has not established a significance threshold for visual effects; however, the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts. For light emissions, the factors to consider include, but are not limited to, the following:

- *"The degree to which the action would have the potential to create annoyance or interfere with normal activities from light emissions"; and*
- *"The degree to which the action would have the potential to affect the visual character of the area due to the light emissions, including the importance, uniqueness, and aesthetic value of the affected visual resources."*

Factors to consider when evaluating the context and intensity of potential environmental impacts for visual resources and visual character include, but are not limited to, the following factors:

- *"The degree to which the action would have the potential to affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources."*
- *"The degree to which the action would have the potential to contrast with the visual resources and/or visual character in the study area."*
- *"The degree to which the action would have the potential to block or obstruct the views of visual."*

4.15.5.2 Alternative 1: No Action Alternative

The new terminal building and associated facilities would not be constructed under the No Action Alternative. The project area currently emits ambient light into the environment. Light emissions would remain unchanged under this alternative. The visual character of the area would also remain unchanged. Impacts on visual resources would not occur.

4.15.5.3 Alternative 2: Construct Terminal Building – Central Location

The Sponsor's Proposed Action would alter current lighting within the DSA. Parking lot lighting would be shifted to the new location of the parking lot. Additionally, the new terminal building would likely utilize outdoor lighting. A vegetated buffer separates the DSA from any residences; therefore, off-airport light emissions are not anticipated.

Based on an analysis of street-view imagery and observations made during the on-site field visit in November 2024, Alternative 2 is not expected to impact the Green Mountain National Forest

or the visual character of the area. The proposed action is entirely contained on Airport property. Visitors to Green Mountain National Forest would continue to have heavily buffered views of the new terminal building due to existing vegetation, topography, and other existing airport infrastructure. As shown in the renderings in **Figure 3-4**, the new terminal building would be consistent with current development at 6B0. The Sponsor's Proposed Action would not significantly alter the viewshed of the area and is not expected to result in significant impacts.

4.16 Water Resources

Water resources are important in providing drinking water and supporting recreation, transportation and commerce, industry, agriculture, and aquatic ecosystems. In accordance with the FAA 1050.1F Desk Reference Section 14, water resources include wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers. As discussed in Section 4.1.3, no floodplains or Wild and Scenic Rivers exist in the GSA. Those resource categories were not carried forward. Therefore, this section is limited to wetlands, surface waters, and groundwater.

4.16.1 Regulatory Context

In Vermont, Section 404 of the Clean Water Act (CWA) permitting process regulates the discharge of dredged or fill material into Waters of the United States (WOTUS), including wetlands, lakes, and streams. Administered primarily by the U.S. Army Corps of Engineers (USACE) in coordination with the Vermont Department of Environmental Conservation (VDEC), the process requires applicants to demonstrate that they have avoided and minimized impacts to aquatic resources and provided compensation for any unavoidable impacts.

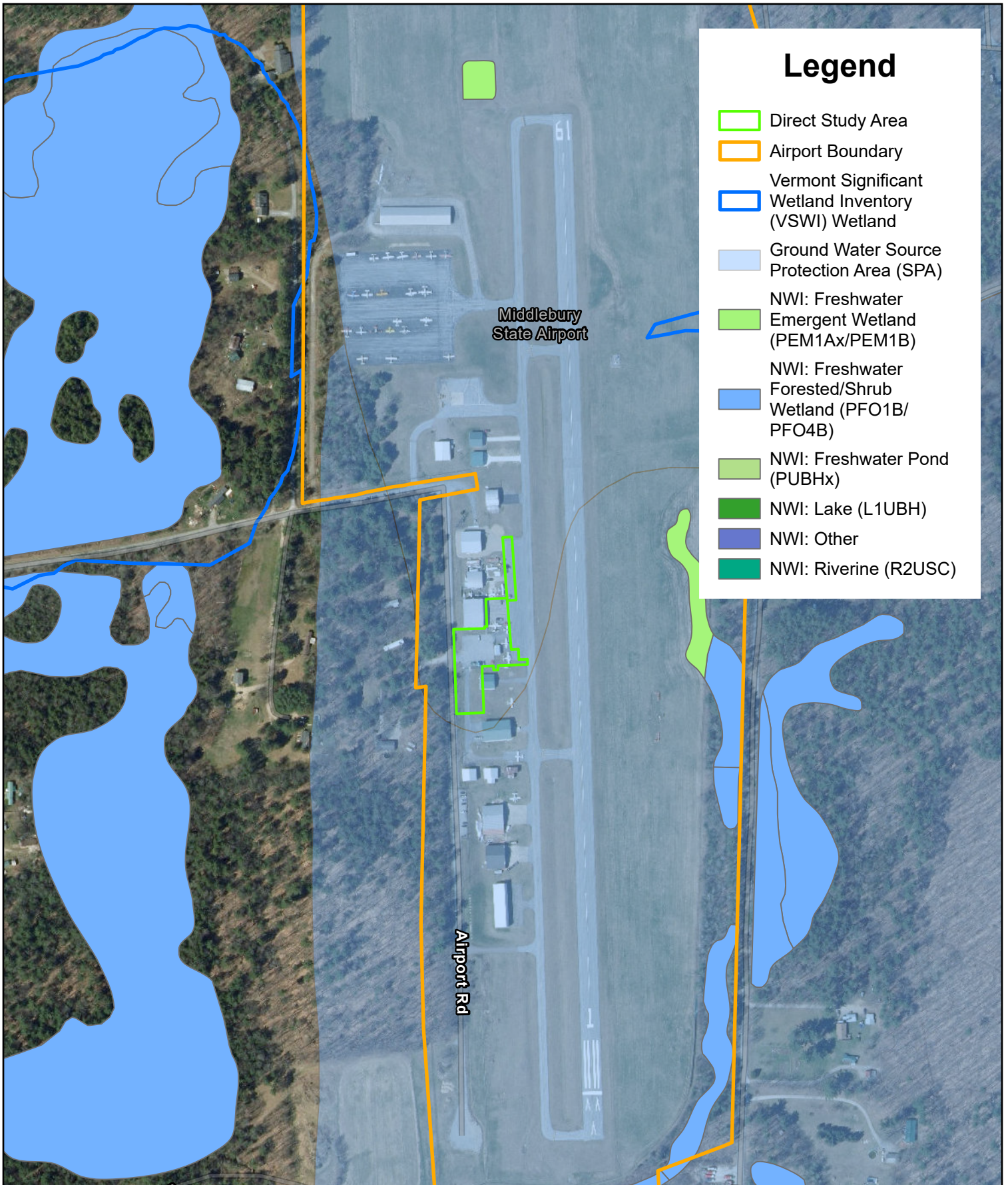
Depending on the scale and nature of the project, applicants may pursue either an Individual Permit for significant impacts or a General Permit for minor impacts. The Section 404 General Permit authorizes certain categories of activities provided they result in no more than minimal adverse environmental effects, which streamlines the approval process for routine projects by establishing eligibility criteria and general conditions. Complementing this, the Section 401 Water Quality Certification, overseen by the VDEC, ensures that federally permitted activities under Section 404 comply with Vermont's water quality standards. For a project to proceed under a Section 404 General Permit, the applicant must either obtain a Section 401 certification or receive a waiver. VDEC has issued a blanket Section 401 certification for activities under the General Permit, contingent on notification and compliance with specified conditions.

The federal regulatory programs designed to protect surface waters include the CWA, the Fish and Wildlife Coordination Act, the Rivers and Harbors Act, and the Safe Drinking Water Act. The authority to implement Section 401 of the CWA and the National Pollution Discharge Elimination System Program (NPDES) has been delegated to the VDEC. Wetlands are also regulated under the State of Vermont Wetland Rules administered by the VDEC under Vermont Statute 10 V.S.A. § 905b(18).

4.16.2 Affected Environment

4.16.2.1 Wetlands

The USFWS National Wetlands Inventory (NWI), the VDEC Wetlands Inventory Map, and the Vermont ANR Natural Resources Atlas were reviewed to determine the potential for wetlands within and surrounding the project. **Figure 4-7** displays the mapped location of wetlands, none of which are found within or adjacent to the DSA. CHA conducted a wetland determination during



Legend

- Direct Study Area
- Airport Boundary
- Vermont Significant Wetland Inventory (VSWI) Wetland
- Ground Water Source Protection Area (SPA)
- NWI: Freshwater Emergent Wetland (PEM1Ax/PEM1B)
- NWI: Freshwater Forested/Shrub Wetland (PFO1B/PFO4B)
- NWI: Freshwater Pond (PUBHx)
- NWI: Lake (L1UBH)
- NWI: Other
- NWI: Riverine (R2USC)



1" = 400'

CHA No.
087308

Figure 4-7: Surface Water Resources

Middlebury State Airport
Middlebury, VT

Source Data
VSWI, Water Features, SPA (VT-ANR), NWI (FWS)

the field visit on November 20, 2024, which confirmed that there are no wetlands within the DSA (see **Appendix A**).

4.16.2.2 Surface Waters

The Vermont ANR Natural Resources Atlas, the VDEC Wetlands Inventory Map, and the NWI were reviewed for the presence of surface water resources. No surface water resources were mapped within or adjacent to the DSA. The field visit completed in November 2024 confirmed that no surface waters are found within the DSA (see **Appendix A**).

4.16.2.3 Groundwater

The Safe Drinking Water Act is the federal regulatory program designed to protect groundwater. The state of Vermont has adopted the Vermont Groundwater Protection Rule and Strategy under the Vermont Statute 10 VSA § 1390-1394. Based on a review of the EPA website, there are no sole source aquifers (SSA) in the vicinity of 6B0. Review of GIS mapping of VDEC groundwater protection zones indicates that the project is located within a groundwater Source Protection Area (SPA) for the Middlebury Water Department, specifically within Zone 2 of the SPA. Zone 2 includes the area where groundwater flows to the specific source of the wellhead for the water supply and where potential impacts to the water supply are probable if contamination were to occur. Existing airport infrastructure is located within this SPA.

4.16.3 Environmental Consequences

Water resources present within and surrounding the project are to be evaluated for both direct and indirect effects from the construction and operation of the proposed action.

4.16.3.1 Significance Threshold

According to FAA Order 1050.1F, Desk Reference, wetlands would be significantly impacted if the Sponsor's Proposed Action were to result in the following:

- Adversely affects the function of a wetland relative to the quality and quantity of municipal water supplies and maintenance of natural systems.
- Substantially alter the hydrology necessary to sustain a wetland.
- Substantially reduce the ability of a wetland to retain floodwater or storm runoff.
- Promote the development of secondary activities that would cause the circumstances listed above.

4.16.3.2 Alternative 1: No Action Alternative

The No-Build Alternative would not impact wetlands. Permitting would not be required. No impervious surface would be added, and ground disturbance would not occur. Therefore, impacts on water resources would not occur.

4.16.3.3 Alternative 2: Construct Terminal Building – Central Location

As previously stated, the field visit in November 2024 determined that no surface waters are present within the DSA. Alternative 2 would not result in direct impacts on surface waters. While the increase in impervious surface would be limited by constructing the terminal building on existing pavement, the Sponsor's Proposed Action is expected to result in an approximately 7,700 sq. ft. increase in impervious surface. The stormwater management system would be upgraded

to manage runoff from the increase in impervious surface. Based on the guidance set forth in the 2017 Vermont Stormwater Management Manual Rule and Design Guidance manual, a preliminary stormwater concept has been developed (refer back to **Figure 3-2**). The area between the Airport Road entrance drive and the existing/proposed parking areas could be converted to either a bioretention area or an infiltration trench. The limits of the stormwater upgrades would be determined during design based on the final calculations of the impervious surface.

Additionally, the new terminal building is expected to be connected to the existing municipal water supply and the existing septic system currently utilized by the adjacent hangars. A wastewater system and potable water supply permit would be required for this action. No well development is anticipated. If, during design, it is determined that a new septic system is required, the new system could be located between the existing hangar and the new parking area. The potential location of the septic tank and leach field is shown in **Figure 3-2**. This area is adequately sized given the minimal amount of domestic waste that the terminal building would produce. If the septic system is determined to require a larger footprint, the system can move east between the two existing hangars.

Contaminants associated with the proposed project are limited. The development is consistent with existing airport infrastructure located within the SPA. A new septic system, if determined to be necessary, would be the most significant potential contaminant source associated with the project. Any proposed wastewater system would be required to comply with the requirements of the approved Source Protection Plan for the SPA. Therefore, potential impacts would be limited. The proposed project does not involve the installation of fuel or oil tanks, industrial facilities, hazardous materials, or other significant sources of contamination. Significant impacts to groundwater resources, including the SPA, are not anticipated as a result of Alternative 2.

The existing NPDES stormwater discharge permit for the Airport would be updated to include the new facility, and the Airport's SWPPP would be updated to reflect the updated BMPs. VTrans would also be required to meet Act 250 permit requirements relevant to water conservation and water supply.

4.17 Summary of Consequences

The Sponsor's Proposed Action would not result in a significant environmental impact. This section summarizes key issues associated with the Sponsor's Proposed Action.

Table 4-6. Summary of Key Issues

Resource Category	Key Issues
Natural Resources	The new terminal building would be designed to meet Commercial Building Energy Standards, which include energy efficiency measures.
Water Resources	To account for the increase in impervious surface, a permanent stormwater BMP would be installed in accordance with the Vermont Stormwater Management Manual Rule and Design Guidance. The new wastewater system would be designed to comply with the requirements of the approved Source Protection Plan for the SPA, and a Wastewater System and Potable Water Supply Permit would be required.

No mitigation measures would be required as part of the Sponsor's Proposed Action. A Vermont Land Use Review Board Act 250 Land Use Permit would be required prior to construction of the project to comply with state regulations. Act 250 is a state development permit specific to Vermont. The project would be required to meet all relevant permit criteria.

4.18 Cumulative Impacts

According to the FAA Order 1050.1F Desk Reference, "cumulative impacts can be viewed as the total combined impacts on the environment of the proposed action or alternative(s) and other known or reasonably foreseeable actions." Assessment of cumulative impacts limits segmentation of the project into smaller components to avoid the required environmental analysis.

The Sponsor's Proposed Action, as documented throughout this EA, would not significantly impact any of the resource categories contained in FAA environmental orders. Projects at 6B0 were examined and documented as part of the cumulative impact analysis.

4.18.1 Past, Present, and Reasonably Foreseeable Projects

Coordination with VTTrans was used to identify and describe past, present, and reasonably foreseeable actions. Although small maintenance projects have been completed over the past three years, the Airport has not completed a major capital improvement project that would have had an impact on environmental resources. There are also no ongoing projects occurring at 6B0.

An Act 250 partial finding was issued preemptively for hangar development at 6B0. The partial finding allows contractors to develop a specific portion of the proposed airfield development immediately upon negotiation. The proposed development, as outlined in the Act 250 permit's partial finding, includes a large hangar (120 ft. by 120 ft.), three medium hangars (60 ft. by 80 ft.), five small hangars (50 ft. by 60 ft.), and approximately 70,450 sq. ft. of new impervious surface near the North Apron on the northern half of the airfield. This development may not occur within five years or may never occur, but it will be considered for cumulative impacts.

4.18.2 Potential Cumulative Impacts

Similar to the Sponsor's Proposed Action, the hangar development project would require an extension of utilities and would result in an increase in impervious surface. However, the hangar project would utilize its own stormwater BMP, which would likely consist of an expanded infiltration basin. The hangar project would also require the following permits or permit amendments:

- Wastewater System and Potable Water Supply Permit
- Stormwater Discharge Individual Permit Amendment
- Construction General Permit
- Act 250 Permit Amendment

Given that a Construction General Permit is required, a construction SWPPP would be developed and implemented, limiting erosion and sedimentation. Noise would be generated during construction, but it would be temporary. Project construction seasons are not expected to overlap. It is also likely that the hangar project will be built in segments, further limiting noise.

The Sponsor's Proposed Action, in conjunction with the potential hangar development, would not have a significant cumulative impact on the environment. If FAA funded, the hangar project would

be required to undertake a NEPA assessment and comply with other federal, state, and local requirements. The Act 250 permit, of which the hangar project has already received a Partial Finding in March 2024, would need to be amended prior to the construction of the hangar development.

5.0 PUBLIC OUTREACH

Chapter 5 provides a summary of agency coordination and public involvement efforts conducted during this EA process.

5.1 Early Agency Coordination

In December 2024, at the beginning of the EA process, early agency coordination letters were sent to various federal, state, and local agencies to solicit comments on how the Sponsor's Proposed Action could impact resources within each agency's jurisdiction. These entities included the following:

- USACE, New England District
- U.S. EPA, Region 1: Boston
- Vermont Agency of Natural Resources
 - Vermont Department of Forests, Parks, and Recreation
 - Vermont Department of Environmental Conservation
 - Vermont Department of Fish and Wildlife
- Vermont Agency of Commerce and Community Development, Division for Historic Preservation
- State of Vermont, District 9 Environmental Commission
- Green Mountain Power
- Addison County Regional Planning Commission
- Town of Middlebury
 - Planning and Zoning
 - Water Division

The letters included three figures depicting the study limits of the North Terminal Alternative and the Central Terminal Alternative (Sponsor's Proposed Action). Agencies were asked to submit any specific concerns they had on the project, any available technical information that would aid in the development of the EA, or any permitting or mitigation requirements that would be necessary for implementation. Agency responses were received through email and have been cataloged as part of **Appendix C**.

5.2 Public Meeting

The Town of Middlebury Selectboard hosts regular Selectboard meetings on the 2nd and 4th Tuesday of each month from the Town Offices at 77 Main Street in Middlebury, Vermont. During the Selectboard meeting on February 25, 2025, the project team gave a presentation detailing the EA process, project overview, and project schedule. The presentation slides and official Selectboard meeting minutes are provided in **Appendix D**.

6.0 LIST OF PREPARERS

Table 6-1 identifies the names and responsibilities of the principal contributors to this EA.

Table 6-1. List of Preparers

Preparer	Title	Responsibility
Federal Aviation Administration		
Cheryl Quaine	Environmental Program Manager, New England Regional Airports Division	Document Reviewer
Vermont Agency of Transportation		
John Nummy	Senior Project Manager	Document Review
Jeannine Russell	Archaeology Officer	Historic and Cultural Resources
Judith Ehrlich	Historic Preservation Officer	Historic and Cultural Resources
CHA Consulting, Inc.		
Taylor Koutropoulos	Project Manager	EA Project Manager
Paul McDonnell	Chief Planner	Client Manager/Quality Control
Ashley Koutropoulos	Environmental Planner	Lead Author & GIS Analyst
Mark Heckroth	Senior Project Manager	Quality Control
Simon Davies	Senior Environmental Planner	Water and Biological Resources

APPENDIX A

Field Memorandum



Technical Memorandum

Prepared By: Simon Davies, ENV SP; LEED AP
Principal Environmental Planner

Date: January 24, 2025

Re: Field Visit
Environmental Assessment
New Terminal Building
Middlebury State Airport
Middlebury, VT

On November 20th, 2024, CHA conducted a field survey of the Detailed Study Area (DSA) associated with the Environmental Assessment (EA) for the construction of a terminal building at the Middlebury State Airport (6B0) in Middlebury, Vermont. The Proposed Action includes the development of an approximately 1,800 square foot (sq. ft.), single-story terminal building to serve existing light general aviation activity and could require the relocation of vehicle parking, airfield fencing, and an existing covered patio. Contingent upon available funding, the project also includes minor expansion of the aircraft apron to provide parking for visiting aircraft, installation of additional aircraft tie downs, resurfacing of a portion of the existing hangar apron, the installation of electric vehicle (EV) charging stations for both vehicles and aircraft, and the above ground extension of 3-phase power service from State Route 113 to the new terminal building.

Two potential locations for the terminal were evaluated during the field survey. Identified as the North Terminal Location and Central Terminal Location, the two locations are detailed in the exhibits included in **Attachment A**. Representative ground level photographs of the DSA for both locations have also been included in **Attachment A**.

Existing Conditions

The DSA is characterized by multiple land uses, ranging from existing airport infrastructure and managed grass to mature forested areas. This memo divides the evaluation into the North Terminal Location and Central Terminal Location.

North Terminal Location:

The North Terminal Location Direct Study Area (DSA) is south and east of the existing tiedown apron and north and west of the fuel farm. While the entire study area was evaluated during the



field survey, an 1,800 sq. ft. terminal with vehicle parking and additional apron area are shown as laid out in the 6B0 Master Plan. An improved driveway would be provided and would connect to Airport Road. This location would require the construction of stormwater infrastructure due to the increase in impervious surface area from both the building and associated parking lots and aircraft movement areas.

An existing roadway and managed turfgrass comprise more than half of the DSA. The remaining area is characterized by the presence of mature trees, including both deciduous hardwoods (oak, beech, maple) and coniferous species (white pine).

Central Terminal Location:

The Central Terminal Location is centrally located on the airport with access via Airport Road. Located between two existing hangars, the site is somewhat constrained; however, with the addition of a small amount of new aircraft apron, the terminal would connect with the existing itinerant apron.

The DSA is predominantly characterized by existing impervious surface and managed turfgrass. No forested areas or other unique natural areas are located within the DSA. The existing impervious surface and stormwater systems would limit the need to construct new stormwater infrastructure.

Biological Resources

In accordance with Federal Aviation Administration (FAA) Order 1050.1F *Environmental Impacts: Policies and Procedures* and its Desk Reference, this section describes the biological resources valued for their intrinsic, aesthetic, economic and/or recreational qualities and includes both plant and animal species (and their respective habitats). It also considers the National Environmental Policy Act (NEPA) regulatory setting which consists of primary statutes, regulations, Executive Orders (EO) and other guidance concerning biological resources.

Regulatory Setting

There are five federal regulatory programs designed to protect biological resources that should be addressed during the preparation of the EA:

- Federal Endangered Species Act (ESA)
- Bald and Golden Eagle Protection Act
- Migratory Bird Treaty Act
- Marine Mammal Protection Act (MMPA)
- Magnuson-Stevens Fishery Conservation Management Act



The Proposed Action being evaluated as part of this EA will not involve any activity that has the potential to harass or otherwise impact marine mammals; therefore no authorization under the MMPA will be sought and will not be discussed further. Similarly, the Proposed Action does not involve work in or near aquatic resources protected by Magnuson-Stevens Fishery Conservation and Management Act; therefore, coordination with the National Marine Fisheries Service will not be necessary.

Federal Endangered Species Act

Coordination with the U.S. Fish & Wildlife Service (USFWS) was completed using the Information for Planning and Consultation (IPaC) website. This informal consultation identified a total of four listed species: the Indiana bat (*Myotis sodalis*), an endangered species, the northern long-eared bat (*Myotis septentrionalis*), an endangered species, the tricolored bat (*Perimyotis subflavus*), a proposed endangered species and the monarch butterfly (*Danaus plexippus*), a candidate species for protection under the ESA. The list of federally protected species that may be present was consistent between both locations. The IPaC for both locations are attached to this document (see **Attachment B**).

As part of the informal consultation process, the *Northeast Endangered Species Determination Key* (released 1/3/2025 and covers the Indiana bat) and *Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key* (released 1/8/2025) were utilized to evaluate the potential effect of the proposed action on the listed species. As siting considerations are significantly different between the North and Central Terminal Locations, the following discussion will be site specific.

North Terminal Location:

The evaluation indicated that the construction of the terminal in this location “May Affect” the Indiana bat. As this location would require the removal of trees and with the previously documented presence of Indiana bats in the vicinity of the airport, this “May Affect” determination would require additional coordination with the USFWS and the Vermont Department of Fish and Wildlife to identify avoidance and minimization measures. The technical assistance letter from the USFWS for this determination can be found in **Attachment B**.

Potential impacts to the Northern long-eared bat and the Tricolored bat were evaluated using the determination key for those species. The endangered Northern Long-eared Bat resulted in a determination of “Not Likely to Adversely Affect”, and the candidate species Tricolored Bat resulted in a “May Affect” determination.

Additionally, the Proposed Action does not include any alteration or removal of potentially suitable habitat for the monarch butterfly. This species requires the presence of milkweed (*Asclepias*) plant species as the larvae are obligated to utilize these plants as a food source. The



existing managed turf in this area does not support the presence of milkweed, and the removal of trees will not affect this species.

Central Terminal Location

Determination keys indicated that the Proposed Action would have “No Affect” on the endangered Indiana bat, is “Not Likely to Adversely Affect” the endangered Northern long-eared bat and “May Affect” the candidate species Tricolored bat.

As the Proposed Action for this location does not include any tree removal, the determination of “May Affect” is primarily due to the presence of existing forested areas (greater than 10 acres in size) that border Airport Road which provides the primary access to the facility. As only a minimal increase in traffic is anticipated to result from the Proposed Action, potential impacts to the Tricolored bat are not expected.

No suitable habitat for the monarch butterfly was identified within the DSA, therefore the Proposed Action will not affect this species.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (50 CFR part 22) protects these eagles from the unauthorized capture, purchase, or transportation of the birds, their nests, or their eggs. While the IPaC coordination listed the bald eagle as potentially present within the proposed project area, the Vermont Agency of Natural Resources (VANR) Natural Resource Atlas does not indicate the presence of bald eagle or golden eagle nests within the DSA of either the North or Central locations. Additionally, visits by individuals of either species to the DSA will not be affected by the Proposed Action. No further coordination with the USFWS is recommended.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (50 CFR part 21) protects migratory birds by prohibiting private parties and some federal agencies from intentionally taking, selling, or conducting other activities that would harm migratory birds, their eggs, or active nests unless an approval of such a taking is issued under a special permit from the Secretary of the Interior. A total of twelve species of migratory birds, including the bald eagle previously discussed, were identified by the USFWS IPaC website as having the potential to occur within the DSA of both the North Terminal and Central Terminal Locations. A list of these species is included in the IPaC which is found in **Attachment B** of this document.

North Terminal Location

While several of the identified migratory bird species are woodland nesting birds (black-billed cuckoo, blue-winged warbler, Canada warbler, Evening grosbeak, rose-breasted grosbeak, and wood thrush), the seasonal clearing restriction in place to minimize potential impact to bat species will also prevent direct impact to nesting individuals of these species. No impacts to



grassland nesting birds or aquatic migratory bird species are anticipated as a result of the Proposed Action.

Central Terminal Location

As no suitable habitat exists for grassland or woodland nesting birds or species that are typically associated with aquatic habitats, no impacts to migratory bird species are anticipated due to the Proposed Action.

Other Executive Orders and Guidance

In addition to the regulatory programs described above, EO 13112, *Invasive Species*, directs federal agencies to consider the effects of their actions on invasive species spread, to take practical measures to prevent the introduction of invasive species, and to provide for the restoration of native species and habitat conditions in ecosystems that have been invaded. Subsequently EO 13751, *Safeguarding the Nation from the Impacts of Invasive Species*, amended the earlier EO 13112 to strengthen coordination and cost effectiveness of the federal efforts to prevent and control invasive species.

North Terminal Location

The presence of invasive species on the fringes of the established wooded area was documented during the field survey. The Proposed Action would result in the removal and control of these species.

Central Terminal Location

No invasive species were present within the DSA.

State Programs

Vermont Statute 10 V.S.A., Chapter 123 provides the list of Vermont Endangered and Threatened Species. This statute provides legislative policy and definitions related to state endangered species law. The statewide list of listed plant and animal species is included in **Attachment B**.

VANR maintains the Vermont Natural Resources Atlas documenting the known presence of listed species. A review of this resource indicates no potential populations of listed animal or plant species present within the DSA of either the North Terminal or Central Terminal Locations. Therefore, the Proposed Action will not affect state listed species.

Wildlife Hazard Management

Airport wildlife hazard management seeks to reduce to the greatest degree possible the potential for wildlife strikes to aircraft operating at the airport. The primary tool for the management of potentially hazardous wildlife is the passive modification of the habitat within and adjacent to the Air Operations Area of the airport.



The Air Operations Area at the airport is currently maintained through mowing which supports an herbaceous vegetative community and removes woody species which provide roosting and feeding opportunities for flocking birds like starlings. Large flocks of such birds can pose a hazard to aircraft and human safety. The Proposed Action for both the North Terminal Location and Central Terminal Location is consistent with ongoing wildlife hazard management at the airport.

Potential Impacts

North Terminal Location

The analysis of the North Terminal Location DSA indicates that the Proposed Action has the potential to affect the Indiana bat through the removal of trees which provide suitable summer roosting habitat. This tree removal also has the potential to affect the Tricolor bat, a proposed endangered species. Should this location be carried through the EA, additional coordination with the USFWS and the Vermont Fish and Wildlife will be required.

Central Terminal Location

The Central Terminal Location will have No Affect on the federally listed Indiana Bat and is Not Likely to Adversely Affect the Northern Long-eared Bat and will be less likely to affect the Tricolor bat. No direct impacts to any of the three bat species are anticipated due to the Proposed Action in this location as no direct disturbance of suitable summer habitat will occur.

Aquatic Resources

In accordance with FAA Order 1050.1F *Environmental Impacts: Policies and Procedures* and its Desk Reference, this section describes water resources that are important in providing drinking water and supporting recreation, transportation and commerce, industry, agriculture, and aquatic ecosystems and includes wetlands, floodplains, surface waters, groundwater, and Wild and Scenic Rivers. The following sections describe regulatory settings, applicable FAA significance thresholds, existing site conditions, environmental consequences, and proposed mitigation measures.

Wetlands

The wetlands at the airport are regulated by federal and state programs including the Clean Water Act (CWA), Executive Order 11990 *Protection of Wetlands*, the Fish and Wildlife Coordination Act, and the State of Vermont Wetland Rules administered by the Vermont Department of Environmental Conservation (VDEC) under Vermont Statute 10 V.S.A. § 905b(18).

A review of the VDEC Wetlands Inventory Map and the USGS National Wetland Inventory indicated no documented wetlands within or adjacent to the DSA for either the North Terminal Location or the Central Terminal Location.



A wetland determination completed during the field survey did not reveal the presence of any of the three wetland indicators in either DSA. There is no likelihood of wetland impacts due to the Proposed Action.

Floodplain

The federal regulatory programs designed to protect floodplains include the National Flood Insurance Act and Executive Order 11988, Floodplain Management. Floodplains are also regulated through multiple jurisdictions, including the National Flood Insurance programs at the municipality level and the Act 250 Land Use Permit program and the River Corridor & Floodplain Protection Rule at the state level through the VDEC.

A review of the VDEC Wetland Inventory Map (which includes Flood Hazard Areas) indicates that no mapped Floodways or Special Flood Hazard Areas are located within or adjacent to the DSA for either the North Terminal Location or Central Terminal Location. The Proposed Action will not result in impacts to jurisdictional Floodplains.

Surface Waters

The federal regulatory programs designed to protect surface waters include CWA, Fish and Wildlife Coordination Act, the Rivers and Harbors Act, and the Safe Drinking Water Act. Authority to implement Section 401 of the CWA and the National Pollution Discharge Elimination System Program has been delegated to the VDEC.

No surface waters were identified with the DSA during a review of the Vermont Wetlands Inventory Map, the NWI, or during the field survey. No impacts to surface waters will occur due to the Proposed Action.

Groundwater

The federal regulatory program designed to protect groundwater is the Safe Drinking Water Act. The state of Vermont has adopted the Vermont Groundwater Protection Rule and Strategy under the Vermont Statute 10 VSA § 1390-1394.

A review of GIS mapping of VDEC groundwater protection zones indicates that both the North Terminal Location and the Central Terminal Location locations are within a groundwater Source Protection Area (SPA) for the Middlebury Water Department, specifically within Zone 2 of the SPA. Zone 2 includes the area where groundwater flows to the specific source of the wellhead for the water supply and where potential impacts to the water supply are probable if contamination were to occur. The existing airport infrastructure is located within this SPA, and future development should be compatible. As the proposed action in both potential locations presumes a direct connection to the existing municipal water supply, no well development is anticipated. Any proposed wastewater system will need to comply with the requirements of the approved Source Protection Plan for the SPA.



Wild and Scenic Rivers

The Federal regulatory program protecting wild and scenic rivers is the Wild and Scenic Rivers Act administered by the National Park Service. No rivers with this designation are located within or proximal to the DSA.

FAA Significance Threshold

The FAA has established a significance threshold for wetlands, floodplains, surface waters, groundwater, and Wild and Scenic Rivers. Wetlands, floodplains, and Wild and Scenic Rivers are not in the project area or close to the project and therefore will not be affected. All thresholds are listed below. A proposed action would have a significant impact when:

Wetlands

- The project adversely affects a wetland's function to protect the quality or quantity of municipal water supplies, including surface waters and sole source and other aquifers; or
- substantially alters the hydrology needed to sustain the affected wetland system's values and functions or those of a wetland to which it is connected; or
- Substantially reduces the affected wetland's ability to retain floodwaters or storm runoff, thereby threatening public health, safety, or welfare (the term welfare includes cultural, recreational, and scientific resources or property important to the public); or
- Adversely affects the maintenance of natural systems supporting wildlife and fish habitat or economically important timber, food, or fiber resources of the affected or surrounding wetlands; or
- Promotes development of secondary activities or services that would cause the circumstances listed above to occur; or
- Is inconsistent with applicable state wetland strategies.

Floodplains

- Notable adverse impacts to existing natural and beneficial floodplain values would result.

Surface Waters

- The project exceeds water quality standards established by federal, state, local, and tribal regulatory agencies; or
- Contaminates public drinking water supply such that public health may be adversely affected.

Groundwater

- The project would cause groundwater quality to exceed standards established by federal, state, local, and tribal regulatory agencies; or



- Contaminate an aquifer used for public water supply such that public health may be adversely affected.

Probable Impacts – North and Central Terminal Locations

Impacts to water resources can be direct, such as placement of fill into a wetland, or indirect, related to construction activities such as accelerated soil erosion or may be long-term and permanent such as stormwater quality impacts.

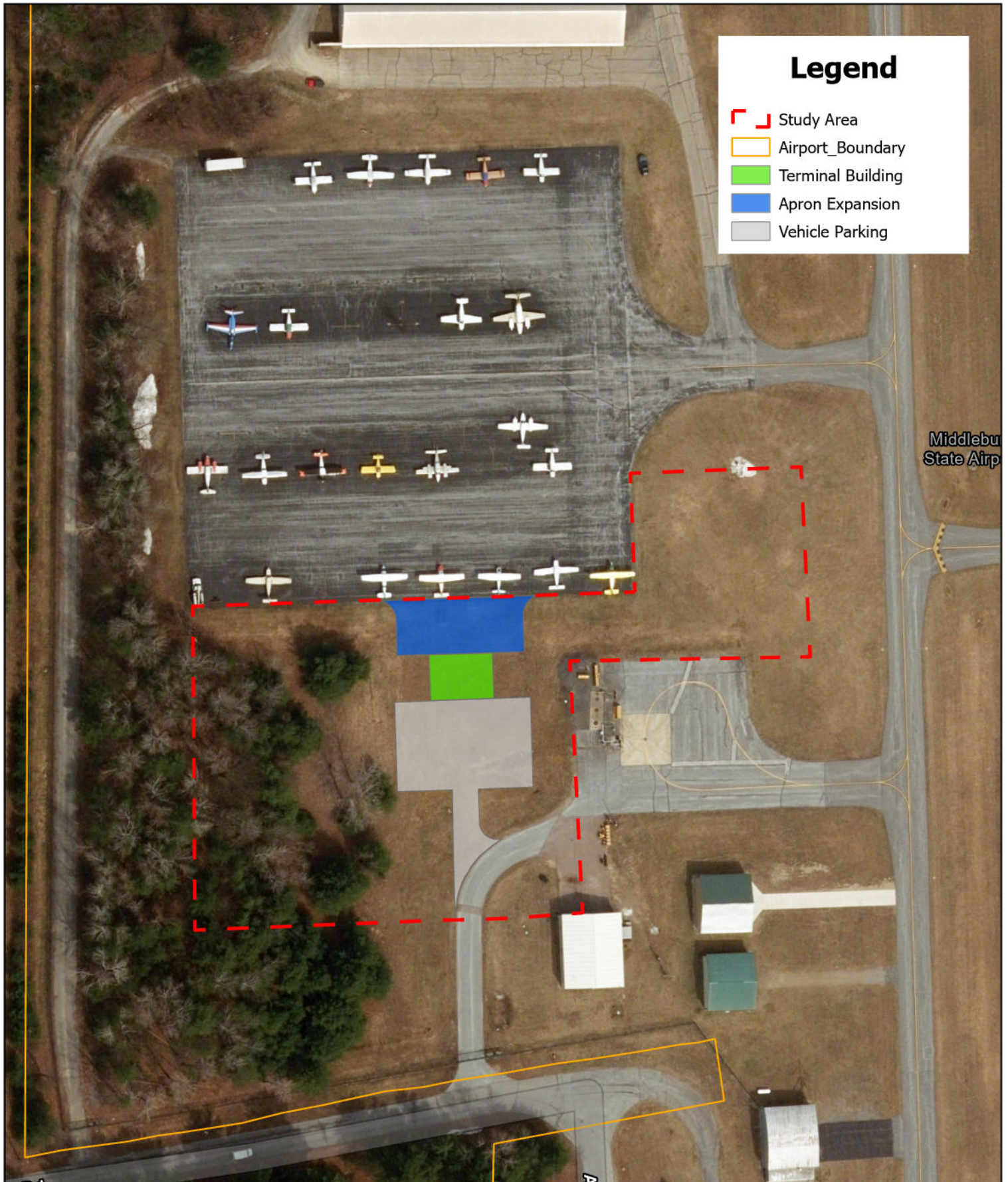
No impacts to wetlands, surface waters, or floodplains are anticipated because of the Proposed Action in either Terminal Location..

As the Proposed Action is located within an established Groundwater Source Protection Area, the terminal design will need to comply with the approved Source Protection Plan to prevent impacts to the Middlebury Water Department supply well.

All remaining impacts would be indirect. The most foreseeable indirect impact would be the potential for increased soil erosion affecting water quality through increases in turbidity during construction. As the anticipated ground disturbance is anticipated to exceed one acre of land area, a Construction General Permit (CGP) 3-9020 will be required to authorize construction activities and should detail the Best Management Practices (BMPs) that will be used to prevent the transport of sediment from the project area. The North Terminal Location would require the design and installation of new stormwater infrastructure to handle the anticipated increase in stormwater quantity associated with the increased in impervious surface.

Attachment A

North Terminal Concept Exhibit
Central Terminal Concept Exhibit
Site Photographs



Legend

- Study Area
- Airport_Boundary
- Terminal Building
- Apron Expansion
- Vehicle Parking

Middlebury
State Airp



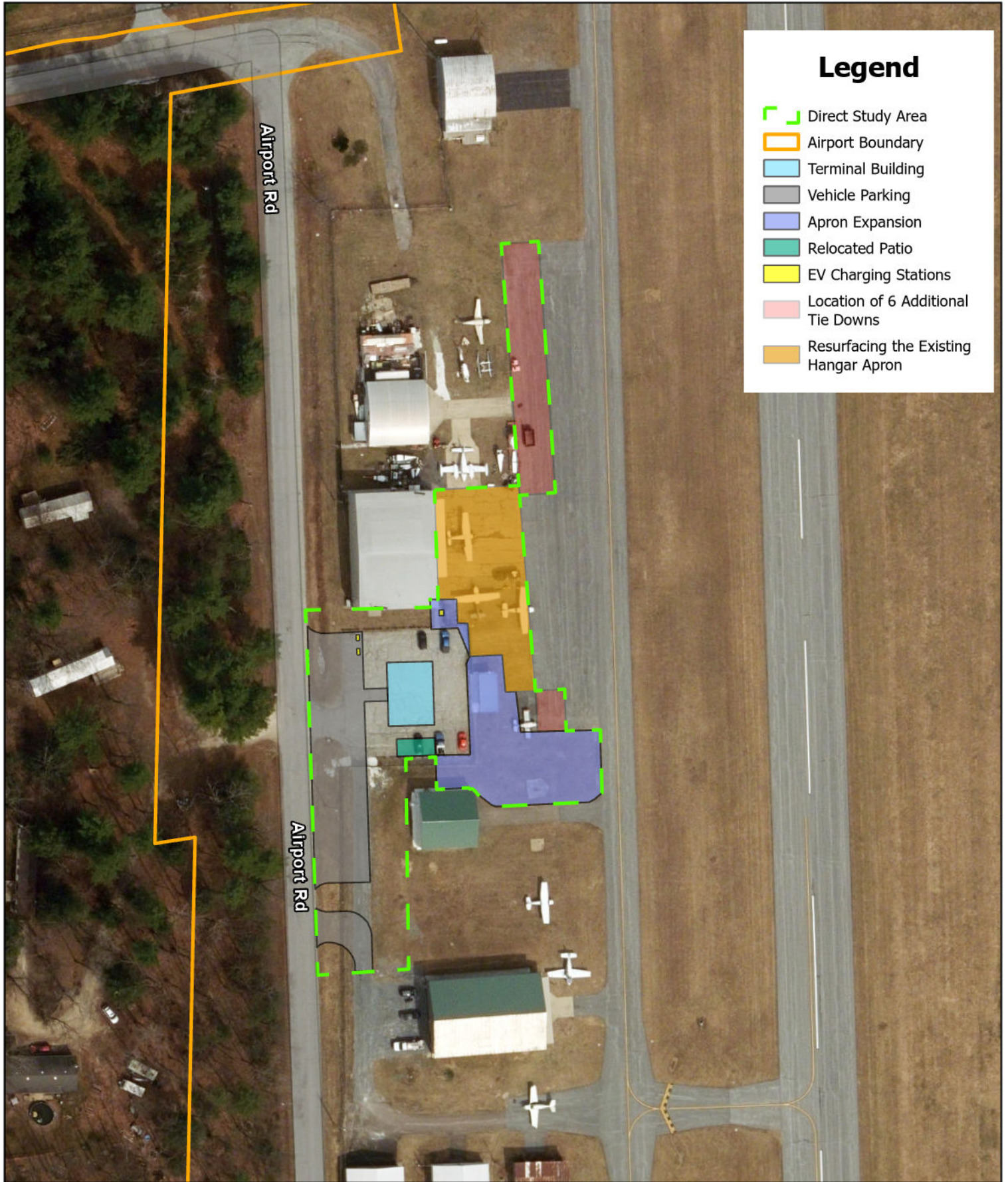
1' = 100"

CHA No.
087308

North Terminal Location

Middlebury State Airport
Middlebury, Vermont

Source Data
Middlebury State Airport (6B0) Master Plan



1' = 100"

CHA No.
087308

Central Terminal Location

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan



North Terminal - looking east across project area



North Terminal – looking north across project area



North Terminal – looking south across project area



North Terminal – looking west across project area



North Terminal – looking west at tree clearing area



Central Terminal – looking east from apron



Central Terminal – looking north across apron



Central Terminal – looking northeast at FBO



Central Terminal – looking south across apron



Central Terminal – looking south along
Airport Road



Central Terminal – looking northeast across parking
lot



Central Terminal – looking north along
Airport Road

Attachment B

USFWS IPaC Species Lists

USFWS Determination Technical Assistance Letters

Vermont Fish and Wildlife Listed Species



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104

In Reply Refer To:

01/10/2025 15:39:45 UTC

Project Code: 2025-0040150

Project Name: Middlebury State Airport - Central Terminal Concept

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

Updated 4/12/2023 - Please review this letter each time you request an Official Species List, we will continue to update it with additional information and links to websites may change.

About Official Species Lists

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Federal and non-Federal project proponents have responsibilities under the Act to consider effects on listed species.

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested by returning to an existing project's page in IPaC.

Endangered Species Act Project Review

Please visit the “**New England Field Office Endangered Species Project Review and Consultation**” website for step-by-step instructions on how to consider effects on listed

species and prepare and submit a project review package if necessary:

<https://www.fws.gov/office/new-england-ecological-services/endangered-species-project-review>

NOTE Please do not use the **Consultation Package Builder** tool in IPaC except in specific situations following coordination with our office. Please follow the project review guidance on our website instead and reference your **Project Code** in all correspondence.

Northern Long-eared Bat - (Updated 4/12/2023) The Service published a final rule to reclassify the northern long-eared bat (NLEB) as endangered on November 30, 2022. The final rule went into effect on March 31, 2023. You may utilize the **Northern Long-eared Bat Rangewide Determination Key** available in IPaC. More information about this Determination Key and the Interim Consultation Framework are available on the northern long-eared bat species page:

<https://www.fws.gov/species/northern-long-eared-bat-myotis-septentrionalis>

For projects that previously utilized the 4(d) Determination Key, the change in the species' status may trigger the need to re-initiate consultation for any actions that are not completed and for which the Federal action agency retains discretion once the new listing determination becomes effective. If your project was not completed by March 31, 2023, and may result in incidental take of NLEB, please reach out to our office at newengland@fws.gov to see if reinitiation is necessary.

Additional Info About Section 7 of the Act

Under section 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to determine whether projects may affect threatened and endangered species and/or designated critical habitat. If a Federal agency, or its non-Federal representative, determines that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Federal agency also may need to consider proposed species and proposed critical habitat in the consultation. 50 CFR 402.14(c)(1) specifies the information required for consultation under the Act regardless of the format of the evaluation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/service/section-7-consultations>

In addition to consultation requirements under Section 7(a)(2) of the ESA, please note that under sections 7(a)(1) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species. Please contact NEFO if you would like more information.

Candidate species that appear on the enclosed species list have no current protections under the ESA. The species' occurrence on an official species list does not convey a requirement to

consider impacts to this species as you would a proposed, threatened, or endangered species. The ESA does not provide for interagency consultations on candidate species under section 7, however, the Service recommends that all project proponents incorporate measures into projects to benefit candidate species and their habitats wherever possible.

Migratory Birds

In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see:

<https://www.fws.gov/program/migratory-bird-permit>

<https://www.fws.gov/library/collections/bald-and-golden-eagle-management>

Please feel free to contact us at **newengland@fws.gov** with your **Project Code** in the subject line if you need more information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat.

Attachment(s): Official Species List

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

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

This species list is provided by:

New England Ecological Services Field Office

70 Commercial Street, Suite 300

Concord, NH 03301-5094

(603) 223-2541

PROJECT SUMMARY

Project Code: 2025-0040150

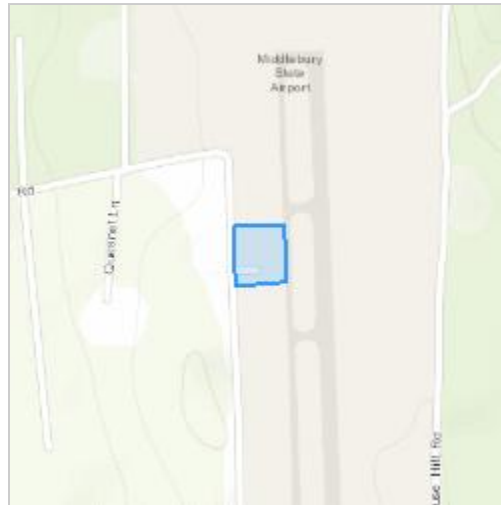
Project Name: Middlebury State Airport - Central Terminal Concept

Project Type: Airport - Maintenance/Modification

Project Description: Construction of a terminal building and associated apron pavement for aircraft movement and parking.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@43.9863749,-73.09658157951498,14z>



Counties: Addison County, Vermont

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

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

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

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

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

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

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

IPAC USER CONTACT INFORMATION

Agency: CHA Consulting
Name: Simon Davies
Address: 201 N. Illinois Street
Address Line 2: Suite 800
City: Indianapolis
State: IN
Zip: 46204
Email: sdavies@chacompanies.com
Phone: 3176947654



United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104



In Reply Refer To:

01/10/2025 15:43:54 UTC

Project code: 2025-0040150

Project Name: Middlebury State Airport - Central Terminal Concept

Federal Nexus: yes

Federal Action Agency (if applicable): Federal Aviation Administration

Subject: Federal agency coordination under the Endangered Species Act, Section 7 for
'Middlebury State Airport - Central Terminal Concept'

Dear Simon Davies:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on January 10, 2025, for "Middlebury State Airport - Central Terminal Concept" (here forward, Project). This project has been assigned Project Code 2025-0040150 and all future correspondence should clearly reference this number.

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into the IPaC must accurately represent the full scope and details of the Project. Failure to accurately represent or implement the Project as detailed in IPaC or the Northeast Determination Key (DKey), invalidates this letter. **Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.**

To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative effect(s)), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17). Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no further consultation with, or concurrence from, the Service is

required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required (except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13]).

The IPaC results indicated the following species is (are) potentially present in your project area and, based on your responses to the Service's Northeast DKey, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Indiana Bat (<i>Myotis sodalis</i>)	Endangered	No effect

Conclusion If there are no updates on listed species, no further consultation/coordination for this project is required for the species identified above. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project implements any changes which are final or commits additional resources.

In addition to the species listed above, the following species and/or critical habitats may also occur in your project area and are not covered by this conclusion:

- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Northern Long-eared Bat *Myotis septentrionalis* Endangered
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered

To complete consultation for species that have reached a "May Affect" determination and/or species may occur in your project area and are not covered by this conclusion, please visit the "New England Field Office Endangered Species Project Review and Consultation" website for step-by-step instructions on how to consider effects on these listed species and/or critical habitats, avoid and minimize potential adverse effects, and prepare and submit a project review package if necessary: <https://www.fws.gov/office/new-england-ecological-services/endangered-species-project-review>

Please Note: If the Action may impact bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act (BGEPA) (54 Stat. 250, as amended, 16 U.S.C. 668a-d) by the prospective permittee may be required. Please contact the Migratory Birds Permit Office, (413) 253-8643, or PermitsR5MB@fws.gov, with any questions regarding potential impacts to Eagles.

If you have any questions regarding this letter or need further assistance, please contact the New England Ecological Services Field Office and reference the Project Code associated with this Project.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

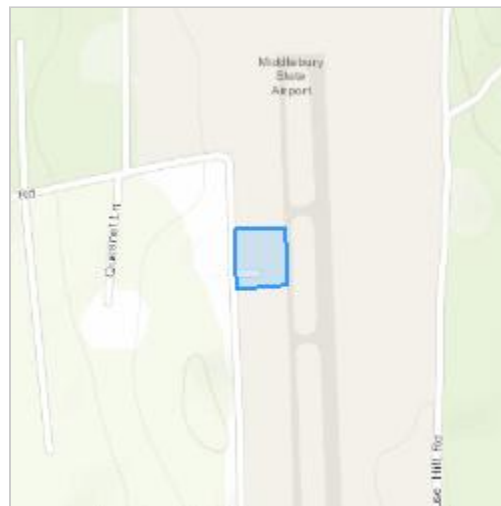
Middlebury State Airport - Central Terminal Concept

2. Description

The following description was provided for the project 'Middlebury State Airport - Central Terminal Concept':

Construction of a terminal building and associated apron pavement for aircraft movement and parking.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@43.9863749,-73.09658157951498,14z>



QUALIFICATION INTERVIEW

1. As a representative of this project, do you agree that all items submitted represent the complete scope of the project details and you will answer questions truthfully?

Yes

2. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed species?

Note: This question could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered, or proposed species.

No

3. Is the action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Yes

4. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) the lead agency for this project?

No

5. Are you including in this analysis all impacts to federally listed species that may result from the entirety of the project (not just the activities under federal jurisdiction)?

Note: If there are project activities that will impact listed species that are considered to be outside of the jurisdiction of the federal action agency submitting this key, contact your local Ecological Services Field Office to determine whether it is appropriate to use this key. If your Ecological Services Field Office agrees that impacts to listed species that are outside the federal action agency's jurisdiction will be addressed through a separate process, you can answer yes to this question and continue through the key.

Yes

6. Are you the lead federal action agency or designated non-federal representative requesting concurrence on behalf of the lead Federal Action Agency?

Yes

7. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)?

No

8. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

No

9. Is the lead federal action agency the Natural Resources Conservation Service?

No

10. Will the proposed project involve the use of herbicide where listed species are present?

No

11. Are there any caves or anthropogenic features suitable for hibernating or roosting bats within the area expected to be impacted by the project?

No

12. Does any component of the project associated with this action include activities or structures that may pose a collision risk to **birds** (e.g., plane-based surveys, land-based or offshore wind turbines, communication towers, high voltage transmission lines, any type of towers with or without guy wires)?

Note: For federal actions, answer 'yes' if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

No

13. Does any component of the project associated with this action include activities or structures that may pose a collision risk to **bats** (e.g., plane-based surveys, land-based or offshore wind turbines)?

Note: For federal actions, answer 'yes' if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

No

14. Will the proposed project result in permanent changes to water quantity in a stream or temporary changes that would be sufficient to result in impacts to listed species?

For example, will the proposed project include any activities that would alter stream flow, such as water withdrawal, hydropower energy production, impoundments, intake structures, diversion structures, and/or turbines? Projects that include temporary and limited water reductions that will not displace listed species or appreciably change water availability for listed species (e.g. listed species will experience no changes to feeding, breeding or sheltering) can answer "No". Note: This question refers only to the amount of water present in a stream, other water quality factors, including sedimentation and turbidity, will be addressed in following questions.

No

15. Will the proposed project affect wetlands where listed species are present?

This includes, for example, project activities within wetlands, project activities within 300 feet of wetlands that may have impacts on wetlands, water withdrawals and/or discharge of contaminants (even with a NPDES).

No

16. Will the proposed project activities (including upland project activities) occur within 0.125 miles of the water's edge of a stream or tributary of a stream where listed species may be present?

No

17. Will the proposed project directly affect a streambed (below ordinary high water mark (OHWM)) of the stream or tributary where listed species may be present?

No

18. Will the proposed project bore underneath (directional bore or horizontal directional drill) a stream where listed species may be present?

No

19. Will the proposed project involve a new point source discharge into a stream or change an existing point source discharge (e.g., outfalls; leachate ponds) where listed species may be present?

No

20. Will the proposed project involve the removal of excess sediment or debris, dredging or in-stream gravel mining where listed species may be present?

No

21. Will the proposed project involve the creation of a new water-borne contaminant source where listed species may be present?

Note New water-borne contaminant sources occur through improper storage, usage, or creation of chemicals. For example: leachate ponds and pits containing chemicals that are not NSF/ANSI 60 compliant have contaminated waterways. Sedimentation will be addressed in a separate question.

No

22. Will the proposed project involve perennial stream loss, in a stream or tributary of a stream where listed species may be present, that would require an individual permit under 404 of the Clean Water Act?

No

23. Will the proposed project involve blasting where listed species may be present?

No

24. Will the proposed project include activities that could negatively affect fish movement temporarily or permanently (including fish stocking, harvesting, or creation of barriers to fish passage).

No

25. Will the proposed project involve earth moving that could cause erosion and sedimentation, and/or contamination along a stream or tributary of a stream where listed species may be present?

Note: Answer "Yes" to this question if erosion and sediment control measures will be used to protect the stream.

No

26. Will the proposed project impact streams or tributaries of streams where listed species may be present through activities such as, but not limited to, valley fills, large-scale vegetation removal, and/or change in site topography?

No

27. Will the proposed project involve vegetation removal within 200 feet of a perennial stream bank where aquatic listed species may be present?

No

28. Will erosion and sedimentation control Best Management Practices (BMPs) associated with applicable state and/or Federal permits, be applied to the project? If BMPs have been provided by and/or coordinated with and approved by the appropriate Ecological Services Field Office, answer "Yes" to this question.

Yes

29. Is the project being funded, lead, or managed in whole or in part by U.S Fish and Wildlife Restoration and Recovery Program (e.g., Partners, Coastal, Fisheries, Wildlife and Sport Fish Restoration, Refuges)?

No

30. [Semantic] Does the project intersect the Virginia big-eared bat critical habitat?

Automatically answered

No

31. [Semantic] Does the project intersect the Indiana bat AOI?

Automatically answered

Yes

32. Is the action area within 0.5 mile radius of any known hibernacula (caves or mines) openings or underground features?

Note: If you are unsure, contact the appropriate Ecological Services Field Office before continuing through the key.

No

33. Are trees present within the action area?

Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats (i.e., live trees and/or snags ≥ 5 inches dbh (12.7 centimeter)), answer "Yes". If you are unsure, answer "Yes." Or refer to Appendix A of the Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines for definitions and an assessment form that will assist you in determining if suitable habitat is present within your project's action area. Suitable summer habitat for Indiana bat consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 5 inches dbh (12.7 centimeter) that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of other forested/wooded habitat

No

34. [Semantic] Does the project intersect the Indiana bat critical habitat?

Automatically answered

No

35. [Semantic] Does the project intersect the candy darter critical habitat?

Automatically answered

No

36. [Semantic] Does the project intersect the diamond darter critical habitat?

Automatically answered

No

37. [Semantic] Does the project intersect the Big Sandy crayfish critical habitat?

Automatically answered

No

38. [Hidden Semantic] Does the project intersect the Guyandotte River crayfish critical habitat?

Automatically answered

No

39. Do you have any other documents that you want to include with this submission?

No

PROJECT QUESTIONNAIRE

1. Approximately how many acres of trees would the proposed project remove?

0

2. Approximately how many total acres of disturbance are within the disturbance/
construction limits of the proposed project?

1.5

3. Briefly describe the habitat within the construction/disturbance limits of the project site.

The proposed project area consists of existing airport infrastructure and parking lot with small areas of managed (mowed) turfgrass and drainage structures.

IPAC USER CONTACT INFORMATION

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LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Aviation Administration



United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104



In Reply Refer To:

01/10/2025 19:16:40 UTC

Project code: 2025-0040150

Project Name: Middlebury State Airport - Central Terminal Concept

Federal Nexus: yes

Federal Action Agency (if applicable): Federal Aviation Administration

Subject: Technical assistance for 'Middlebury State Airport - Central Terminal Concept'

Dear Simon Davies:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on January 10, 2025, for 'Middlebury State Airport - Central Terminal Concept' (here forward, Project). This project has been assigned Project Code 2025-0040150 and all future correspondence should clearly reference this number. **Please carefully review this letter. Your Endangered Species Act (Act) requirements are not complete.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project. **Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey), invalidates this letter.**

Determination for the Northern Long-Eared Bat and Tricolored Bat

Based on your IPaC submission and a standing analysis completed by the Service, you determined the proposed Project will have the following effect determinations:

Species	Listing Status	Determination
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	Endangered	NLAA
Tricolored Bat (<i>Perimyotis subflavus</i>)	Proposed	May affect
	Endangered	

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Indiana Bat *Myotis sodalis* Endangered
- Monarch Butterfly *Danaus plexippus* Proposed Threatened

You may coordinate with our Office to determine whether the Action may cause prohibited take of the species listed above.

Conclusion

Consultation with the Service is not complete. Further consultation or coordination with the Service is necessary for those species or designated critical habitats with a determination of “May Affect.” A “May Affect” determination in this key indicates that the project, as entered, is not consistent with the questions in the key. Not all projects that reach a “May Affect” determination are anticipated to result in adverse impacts to listed species. These projects may result in a “No Effect”, “May Affect, Not Likely to Adversely Affect”, or “May Affect, Likely to Adversely Affect” determination depending on the details of the project. Please contact our New England Ecological Services Field Office to discuss methods to avoid or minimize potential adverse effects to those species or designated critical habitats.

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate. Projects that receive a may affect determination for tricolored bat through the key, should contact the appropriate Ecological Services Field Office if they want to conference on this species.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

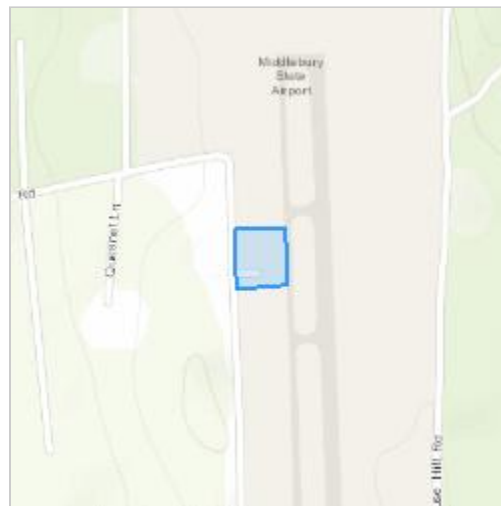
Middlebury State Airport - Central Terminal Concept

2. Description

The following description was provided for the project 'Middlebury State Airport - Central Terminal Concept':

Construction of a terminal building and associated apron pavement for aircraft movement and parking.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@43.9863749,-73.09658157951498,14z>



DETERMINATION KEY RESULT

Based on the answers provided, the proposed Action is consistent with a determination of “may affect” for a least one species covered by this determination key.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species?

Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

Automatically answered

No

4. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

Note: For federal actions, answer ‘yes’ if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

No

5. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Yes

6. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

No

7. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

No

8. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

No

9. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

No

10. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

No

11. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

No

12. Does the action area contain (1) talus or (2) anthropogenic or naturally formed rock shelters or crevices in rocky outcrops, rock faces or cliffs?

No

13. Will the action cause effects to a covered bridge?

No

14. Are trees present within 1000 feet of the action area?

Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

15. Does the action include the intentional exclusion of bats from a building or structure?

Note: Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

No

16. Does the action involve removal, modification, or maintenance of a human-made structure (barn, house, or other building) **known or suspected to contain roosting bats**?

No

17. Will the action cause construction of one or more new roads open to the public?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

18. Will the action include or cause any construction or other activity that is reasonably certain to increase average daily traffic permanently or temporarily on one or more existing roads?

Note: For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

Yes

19. Will the increased vehicle traffic occur on any road that lies between any two areas of contiguous forest that are each greater than or equal to 10 acres in extent and are separated by less than 1,000 feet? Bats may cross a road by flying between forest patches that are up to 1,000 feet apart.

Note: "Contiguous forest" of 10 acres or more may include areas where multiple forest patches are separated by less than 1,000 feet of non-forested area if the forested patches, added together, comprise at least 10 acres.

Yes

20. For every 1,000 feet of road where increased traffic is expected, will there be at least one place where bats could cross the road corridor by flying less than 33 feet (10 meters) between trees whose tops are at least 66 feet (20 meters) higher than the road surface?

Yes

21. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

Note: For information regarding NSF/ANSI 60 please visit <https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects>

No

22. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

No

23. Will the action include drilling or blasting?

No

24. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use)?

No

25. Will the proposed action involve the use of herbicides or other pesticides other than herbicides (e.g., fungicides, insecticides, or rodenticides)?

No

26. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season?

Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining.

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

27. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable northern long-eared bat or tricolored bat roosting habitat?

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

No

28. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

No

29. Will the proposed action result in the use of prescribed fire?

Note: If the prescribed fire action includes other activities than application of fire (e.g., tree cutting, fire line preparation) please consider impacts from those activities within the previous representative questions in the key. This set of questions only considers impacts from flame and smoke.

No

30. Does the action area intersect the northern long-eared bat species list area?

Automatically answered

Yes

31. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats?

Automatically answered

No

32. [Semantic] Is the action area located within 150 feet of a documented northern long-eared bat roost site?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

No

33. Is suitable summer habitat for the northern long-eared bat present within 1000 feet of project activities?

If unsure, answer "Yes."

Note: Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in Appendix A of the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines at: <https://www.fws.gov/media/range-wide-indiana-bat-and-northern-long-eared-bat-survey-guidelines>.

Yes

34. Does the action area intersect the tricolored bat species list area?

Automatically answered

Yes

35. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

No

36. Is suitable summer habitat for the tricolored bat present within 1000 feet of project activities?

(If unsure, answer ""Yes."")

Note: If there are trees within the action area that may provide potential roosts for tricolored bats (e.g., clusters of leaves in live and dead deciduous trees, Spanish moss (*Tillandsia usneoides*), clusters of dead pine needles of large live pines) answer ""Yes."" For a complete definition of suitable summer habitat for the tricolored bat, please see Appendix A in the [Service's Range-wide Indiana Bat and Northern long-eared Bat Survey Guidelines](#).

Yes

37. Do you have any documents that you want to include with this submission?

No

PROJECT QUESTIONNAIRE

IPAC USER CONTACT INFORMATION

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LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Aviation Administration



Endangered and Threatened Animals of Vermont
Vermont Natural Heritage Inventory
Vermont Fish & Wildlife Department
10 February 2022



The species in the following list are protected by **Vermont's Endangered Species Law (10 V.S.A. Chap. 123)**. There are 37 state-endangered and 16 state-threatened animals in Vermont. Those with a federal status of Threatened or Endangered are also protected by the **Federal Endangered Species Act (P.L. 93-205)**.

For further information contact the Vermont Natural Heritage Inventory, Vermont Fish & Wildlife Department, 1 National Life Drive, Davis 2, Montpelier, VT 05620-3702. (802) 828-1000.

English Name	Scientific Name	State Status	Federal Status
Fishes			
Northern Brook Lamprey	<i>Ichthyomyzon fossor</i>	E	
American Brook Lamprey	<i>Lethenteron appendix</i> Synonym: <i>Lampetra appendix</i>	T	
Lake Sturgeon	<i>Acipenser fulvescens</i>	E	UR
Stonecat	<i>Noturus flavus</i>	E	
Eastern Sand Darter	<i>Ammocrypta pellucida</i>	T	
Channel Darter	<i>Percina copelandi</i>	E	
Amphibians			
Fowler's Toad	<i>Anaxyrus fowleri</i>	E	
Boreal Chorus Frog	<i>Pseudacris maculata</i>	E	
Reptiles			
Spotted Turtle	<i>Clemmys guttata</i>	E	UR
Spiny Softshell (Turtle)	<i>Apalone spinifera</i>	T	
Common Five-lined Skink	<i>Plestiodon fasciatus</i> Synonym: <i>Eumeces fasciatus</i>	E	
North American Racer	<i>Coluber constrictor</i>	T	
Eastern Ratsnake	<i>Pantherophis alleghaniensis</i> Synonym: <i>Elaphe obsoleta</i>	T	
Timber Rattlesnake	<i>Crotalus horridus</i>	E	
Mammals			
Eastern Small-footed Bat	<i>Myotis leibii</i>	T	
Little Brown Bat	<i>Myotis lucifugus</i>	E	UR

English Name	Scientific Name	State Status	Federal Status
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	E	E
Indiana Bat	<i>Myotis sodalis</i>	E	E
Tri-colored Bat	<i>Perimyotis subflavus</i> Synonym: <i>Pipistrellus subflavus</i>	E	PE
Canadian Lynx	<i>Lynx canadensis</i>	E	T
Eastern Mountain Lion	<i>Puma concolor couguar</i> Synonym: <i>Felis concolor couguar</i>	E	
American Marten	<i>Martes americana</i>	E	
Birds			
Spruce Grouse	<i>Canachites canadensis</i> Synonym: <i>Falcipennis canadensis</i>	E	
Eastern Whip-poor-will	<i>Antrostomus vociferus</i> Synonym: <i>Caprimulgus vociferus</i>	T	
Common Nighthawk	<i>Chordeiles minor</i>	E	
Upland Sandpiper	<i>Bartramia longicauda</i>	E	
Red Knot	<i>Calidris canutus</i>	T*	T
Black Tern	<i>Chlidonias niger</i>	E	
Common Tern	<i>Sterna hirundo</i>	E	
Loggerhead Shrike	<i>Lanius ludovicianus</i>	E	
Sedge Wren	<i>Cistothorus stellaris</i> Synonym: <i>Cistothorus platensis</i>	E	
Rusty Blackbird	<i>Euphagus carolinus</i>	E	
Eastern Meadowlark ¹	<i>Sturnella magna</i>	T	
Grasshopper Sparrow	<i>Ammodramus savannarum</i>	T	
Henslow's Sparrow	<i>Centronyx henslowii</i> Synonym: <i>Ammodramus henslowii</i>	E	
Amphipods			
Taconic Cave Amphipod	<i>Stygobromus borealis</i>	E	
Beetles			
Hairy-necked Tiger Beetle	<i>Cicindela hirticollis</i>	T	
Cobblestone Tiger Beetle	<i>Cicindela marginipennis</i>	T	
Puritan Tiger Beetle	<i>Ellipsoptera puritana</i> Synonym: <i>Cicindela puritana</i>	T	T
Bees			
Rusty-patched Bumble Bee	<i>Bombus affinis</i>	E	E

* Red Knot (*Calidris canutus rufa*) was added to the Federal list on 12 January 2015. Listed in Vermont by default, per statute; has not undergone rule-making in Vermont.

¹ Listed 10 February 2022

English Name	Scientific Name	State Status	Federal Status
Ashton Cuckoo Bumble Bee	<i>Bombus ashtoni</i> (<i>Bombus bohemicus</i>)	E	
American Bumble Bee ²	<i>Bombus pensylvanicus</i>	E	UR
Yellow-banded Bumble Bee	<i>Bombus terricola</i>	T	
Freshwater Mussels and Cla			
Eastern Pearlshell	<i>Margaritifera margaritifera</i>	T	
Dwarf Wedgemussel	<i>Alasmodonta heterodon</i>	E	E
Brook Floater	<i>Alasmodonta varicosa</i>	E	
Cylindrical Papershell	<i>Anodontoides ferussacianus</i>	E	
Pocketbook	<i>Lampsilis ovata</i>	E	
Flutedshell	<i>Lasmigona costata</i>	E	
Fragile Papershell	<i>Leptodea fragilis</i>	E	
Black Sandshell	<i>Ligumia recta</i>	E	
Pink Heelsplitter	<i>Potamilus alatus</i>	E	
Giant Floater	<i>Pyganodon grandis</i>	T	

2 Listed 10 February 2022

State Status - Legal protection under Vermont Endangered Species Law (10 V.S.A. Chap. 123)

E = Endangered: in immediate danger of becoming extirpated in the state

T = Threatened: with high possibility of becoming endangered in the near future

Federal Status - Legal protection under the federal Endangered Species Act, U.S. Fish & Wildlife Service

E = Endangered

T = Threatened

P = Proposed

UR = Under Review



Endangered and Threatened Plants of Vermont
Vermont Natural Heritage Inventory
Vermont Fish & Wildlife Department
10 February 2022



The following species are protected by **Vermont's Endangered Species Law (10 V.S.A. Chap. 123)**. There are 71 state-endangered and 93 state-threatened plants in Vermont. Those with a federal status of Threatened or Endangered are also protected by the **Federal Endangered Species Act (P.L. 93-205)**. Note that not all synonyms are included.

For further information contact the Vermont Natural Heritage Inventory, Vermont Fish & Wildlife Department, 1 National Life Drive, Davis 2, Montpelier, VT 05620-3702. (802) 828-1000.

Scientific Name	English Name	State Status	Federal Status
Vascular Plants			
<i>Adiantum viridimontanum</i>	Green Mountain Maidenhair-fern	T	
<i>Agastache nepetoides</i>	Yellow Giant Hyssop	T	
<i>Agastache scrophulariifolia</i>	Purple Giant Hyssop	T	
<i>Allium canadense</i> var. <i>canadense</i>	Wild Garlic	T	
<i>Ammophila breviligulata</i> ssp. <i>champlainensis</i>	Champlain Beach Grass	E	
<i>Anemone multifida</i> var. <i>multifida</i>	Early Thimbleweed	E	
<i>Anthoxanthum monticola</i> ssp. <i>monticola</i>	Alpine Sweet-grass	T	
<i>Anticlea elegans</i> ssp. <i>glauca</i> Synonym: <i>Anticlea glauca</i>	White Camas	E	
<i>Aplectrum hyemale</i>	Putty-root	T	
<i>Arabidopsis lyrata</i>	Lyre-leaved Rock-cress	T	
<i>Arethusa bulbosa</i>	Arethusa	T	
<i>Arisaema dracontium</i>	Green Dragon	T	
<i>Asclepias amplexicaulis</i>	Blunt-leaved Milkweed	T	
<i>Asclepias tuberosa</i> ssp. <i>tuberosa</i>	Butterfly-weed	T	
<i>Asclepias verticillata</i>	Whorled Milkweed	E	
<i>Asplenium montanum</i>	Mountain Spleenwort	T	
<i>Asplenium viride</i>	Green Spleenwort	T	
<i>Astragalus canadensis</i> var. <i>canadensis</i>	Canada Milk-vetch	T	
<i>Astragalus robbinsii</i> var. <i>jesupii</i>	Jesup's Milk-vetch	E	E
<i>Betula minor</i>	Dwarf Birch	E	
<i>Blephilia hirsuta</i> var. <i>glabrata</i>	Smooth Wood-mint	T	
<i>Blephilia hirsuta</i> var. <i>hirsuta</i>	Hairy Wood-mint	T	
<i>Boechera stricta</i>	Drummond's Rock-cress	E	
<i>Botrychium minganense</i>	Mingan Moonwort	E	
<i>Braya humilis</i> ssp. <i>humilis</i>	Northern Rock-cress	T	

Scientific Name	English Name	State Status	Federal Status
<i>Calamagrostis pickeringii</i>	Pickering's Reed-grass	E	
<i>Calamagrostis stricta</i> ssp. <i>inexpansa</i>	Bentgrass	E	
<i>Calypso bulbosa</i> var. <i>americana</i>	Fairy Slipper	T	
<i>Calystegia spithamea</i> ssp. <i>spithamea</i>	Low Bindweed	T	
<i>Carex arcta</i>	Contracted Sedge	E	
<i>Carex atratiformis</i>	Blackish Sedge	T	
<i>Carex buxbaumii</i>	Buxbaum's Sedge	E	
<i>Carex capillaris</i> ssp. <i>capillaris</i>	Capillary Sedge	T	
<i>Carex chordorrhiza</i>	Creeping Sedge	E	
<i>Carex foenea</i> Willd. ¹ Synonym: <i>Carex aenea</i> Fern.	Bronze Sedge	E	
<i>Carex garberi</i>	Garber's Sedge	T	
<i>Carex houghtoniana</i> ²	Houghton's Sedge	E	
<i>Carex livida</i>	Pale Sedge	T	
<i>Carex muehlenbergii</i> var. <i>enervis</i>	Nerveless Muehlenberg Sedge	T	
<i>Carex muehlenbergii</i> var. <i>muehlenbergii</i>	Muehlenberg's Sedge	T	
<i>Carex oligocarpa</i>	Few-fruited Sedge	E	
<i>Carex richardsonii</i>	Richardson's Sedge	E	
<i>Carex siccata</i> ¹	Hay Sedge	E	
<i>Carex vaginata</i>	Sheathed Sedge	E	
<i>Castilleja septentrionalis</i>	Pale Painted-cup	T	
<i>Ceanothus herbaceus</i>	Prairie Redroot	E	
<i>Corallorhiza odontorhiza</i> var. <i>odontorhiza</i>	Autumn Coral-root	T	
<i>Cornus florida</i>	Flowering Dogwood	T	
<i>Corydalis aurea</i>	Golden Corydalis	T	
<i>Crocanthemum bicknellii</i>	Plains Frostweed	T	
<i>Crotalaria sagittalis</i>	Rattlebox	T	
<i>Cynoglossum virginianum</i> var. <i>boreale</i>	Northern Wild Comfrey	T	
<i>Cyperus diandrus</i>	Low Flatsedge	E	
<i>Cyperus houghtonii</i>	Houghton's Flatsedge	T	
<i>Cypripedium arietinum</i>	Ram's Head Lady's-slipper	T	
<i>Desmodium cuspidatum</i>	Large-bracted Tick-trefoil	E	
<i>Desmodium rotundifolium</i>	Prostrate Tick-trefoil	T	
<i>Diapensia lapponica</i> ssp. <i>lapponica</i>	Diapensia	E	
<i>Draba cana</i>	Hoary Draba	T	
<i>Draba glabella</i>	Smooth Draba	T	
<i>Dracocephalum parviflorum</i>	American Dragonhead	T	
<i>Dryopteris filix-mas</i> ssp. <i>brittonii</i>	Male Fern	T	
<i>Eleocharis quinqueflora</i>	Few-flowered Spikerush	T	
<i>Equisetum palustre</i>	Marsh Horsetail	T	
<i>Eupatorium sessilifolium</i>	Sessile-leaved Boneset	E	

¹ *Carex siccata* is the currently accepted name for what was called *Carex foenea* in older manuals. *Carex foenea* is the currently accepted name for what was called *Carex aenea* in older manuals.

² Listed on 10 February 2022.

Scientific Name	English Name	State Status	Federal Status
<i>Fimbristylis autumnalis</i>	Autumn Fimbristylis	E	
<i>Galium labradoricum</i>	Bog Bedstraw	T	
<i>Gentiana andrewsii</i>	Fringe-top Closed Gentian	T	
<i>Gentianella amarella</i> ssp. <i>acuta</i>	Felwort	T	
<i>Gentianella quinquefolia</i>	Stiff Gentian	T	
<i>Glyceria acutiflora</i>	Sharp Manna-grass	E	
<i>Hackelia deflexa</i> ssp. <i>americana</i>	Nodding Stickseed	T	
<i>Helianthus strumosus</i>	Harsh Sunflower	T	
<i>Hippuris vulgaris</i>	Mare's-tail	E	
<i>Hudsonia tomentosa</i>	Beach Heather	E	
<i>Hydrastis canadensis</i>	Golden-seal	E	
<i>Hydrophyllum canadense</i>	Broad-leaved Waterleaf	T	
<i>Hypericum ascyron</i>	Great St. John's-wort	T	
<i>Isoetes engelmannii</i>	Engelmann's Quillwort	T	
<i>Isoetes viridimontana</i>	Green Mountain Quillwort	E	
<i>Isotria medeoloides</i>	Small Whorled Pogonia	E	T
<i>Isotria verticillata</i>	Large Whorled Pogonia	T	
<i>Juncus greenei</i>	Greene's Rush	E	
<i>Juncus militaris</i>	Soldier Rush	E	
<i>Juncus secundus</i>	Secund Rush	E	
<i>Juniperus horizontalis</i>	Creeping Juniper	T	
<i>Lactuca hirsuta</i>	Hairy Lettuce	T	
<i>Lathyrus japonicus</i> var. <i>maritimus</i>	Beach Pea	T	
<i>Lathyrus palustris</i>	Marsh Vetchling	T	
<i>Lechea mucronata</i>	Hairy Pinweed	E	
<i>Lespedeza frutescens</i> ³ Synonym: <i>Lespedeza violacea</i>	Violet Bush-clover	T	
<i>Lespedeza hirta</i> ssp. <i>hirta</i>	Hairy Bush-clover	T	
<i>Liparis liliifolia</i>	Lily-leaved Twayblade	T	
<i>Liriodendron tulipifera</i>	Tulip Tree	E	
<i>Ludwigia polycarpa</i>	Many-fruited False-loosestrife	E	
<i>Lupinus perennis</i> ssp. <i>perennis</i>	Wild Lupine	E	
<i>Lygodium palmatum</i>	Climbing Fern	E	
<i>Malaxis monophyllos</i> var. <i>brachypoda</i>	White Adder's-mouth	T	
<i>Minuartia marcescens</i>	Marcescent Sandwort	T	
<i>Minuartia rubella</i>	Marble Sandwort	T	
<i>Morus rubra</i>	Red Mulberry	T	
<i>Nabalus boottii</i>	Boott's Rattlesnake-root	E	
<i>Neottia auriculata</i>	Auricled Twayblade	E	
<i>Neottia bifolia</i>	Southern Twayblade	E	
<i>Nymphaea leibergii</i>	Dwarf Water-lily	E	

³ *Lespedeza violacea* (L.) Pers. is now what was formerly known as *L. intermedia* (S. Watts) Britton and is not listed. The currently accepted name, *Lespedeza frutescens*, is synonymous with *Lespedeza violacea* of authors other than (L.) Pers.

Scientific Name	English Name	State Status	Federal Status
<i>Omalotheca sylvatica</i>	Woodland Cudweed	E	
<i>Panicum flexile</i>	Stiff Witch-grass	E	
<i>Petasites frigidus</i> var. <i>palmatus</i>	Sweet Coltsfoot	T	
<i>Physostegia virginiana</i> ssp. <i>virginiana</i>	Obedient Plant	T	
<i>Pinus banksiana</i>	Jack Pine	T	
<i>Piptatheropsis pungens</i>	Slender Mountain-rice	T	
<i>Platanthera flava</i> var. <i>herbiola</i>	Tubercled Orchid	T	
<i>Platanthera hookeri</i>	Hooker's Orchid	T	
<i>Polemonium vanbruntiae</i>	Eastern Jacob's Ladder	T	
<i>Polygonum douglasii</i>	Douglas' Knotweed	E	
<i>Polymnia canadensis</i>	White-flowered Leafcup	E	
<i>Potentilla litoralis</i>	Northern Cinquefoil	E	
<i>Primula mistassinica</i>	Bird's-eye Primrose	T	
<i>Prunus americana</i>	Wild Plum	T	
<i>Prunus susquehannae</i>	Susquehanna Sand Cherry	E	
<i>Pterospora andromedea</i>	Pinedrops	E	
<i>Pycnanthemum incanum</i> var. <i>incanum</i>	Hoary Mountain-mint	E	
<i>Pyrola asarifolia</i> ssp. <i>asarifolia</i>	Bog Wintergreen	T	
<i>Pyrola minor</i>	Lesser Pyrola	E	
<i>Quercus ilicifolia</i>	Scrub Oak	E	
<i>Quercus prinoides</i>	Dwarf Chinquapin Oak	E	
<i>Ranunculus allegheniensis</i>	Allegheny Crowfoot	T	
<i>Rhexia virginica</i>	Virginia Meadow-beauty	T	
<i>Rhodiola rosea</i>	Roseroot	T	
<i>Rhododendron maximum</i>	Great Laurel	T	
<i>Rhynchospora capillacea</i>	Capillary Beak-rush	T	
<i>Rorippa aquatica</i>	Lake-cress	T	
<i>Rosa acicularis</i> ssp. <i>sayi</i>	Needle-spine Rose	E	
<i>Salix planifolia</i> ssp. <i>planifolia</i>	Tea-leaved Willow	T	
<i>Salix uva-ursi</i>	Bearberry Willow	E	
<i>Sanicula canadensis</i> var. <i>grandis</i> ⁴	Long-styled Snakeroot	T	
<i>Scheuchzeria palustris</i>	Pod-grass	T	
<i>Scirpus ancistrochaetus</i>	Barbed-bristle Bulrush	E	E
<i>Senna hebecarpa</i>	Wild Senna	T	
<i>Solidago odora</i> ssp. <i>odora</i>	Sweet Goldenrod	T	
<i>Solidago ulmifolia</i>	Elm-leaved Goldenrod	E	
<i>Sparganium natans</i>	Lesser Bur-reed	T	
<i>Sphenopholis nitida</i>	Shiny Wedgegrass	E	
<i>Sphenopholis obtusata</i>	Blunt Sphenopholis	E	
<i>Sporobolus compositus</i> var. <i>compositus</i>	Rough Dropseed	E	
<i>Taenidia integerrima</i>	Yellow Pimpernel	T	

⁴ *Sanicula canadensis* var. *canadensis* delisted on 10 February 2022. *Sanicula canadensis* var *grandis* remains listed as Threatened.

Scientific Name	English Name	State Status	Federal Status
<i>Thalictrum thalictroides</i> ⁵	Rue-anemone	E	
<i>Triantha glutinosa</i>	Sticky False-asphodel	T	
<i>Trichophorum planifolium</i>	Bashful Bulrush	E	
<i>Triglochin maritima</i>	Common Arrow-grass	E	
<i>Triphora trianthophoros</i> ssp. <i>trianthophoros</i>	Three-bird Orchid	T	
<i>Ulmus thomasii</i>	Cork Elm (Rock Elm)	T	
<i>Utricularia resupinata</i>	Northeastern Bladderwort	T	
<i>Vaccinium stamineum</i>	Deerberry	E	
<i>Valeriana uliginosa</i>	Marsh Valerian	E	
<i>Veronicastrum virginicum</i>	Culver's-root	E	
<i>Viburnum edule</i>	Squashberry	T	
<i>Viola lanceolata</i> ssp. <i>lanceolata</i>	Lance-leaved Violet	T	
<i>Vulpia octoflora</i> var. <i>tenella</i>	Eight-flowered Fescue	E	
<i>Woodsia alpina</i>	Alpine Woodsia	E	
<i>Woodwardia virginica</i>	Virginia Chain-fern	T	
<i>Xyris montana</i>	Northern Yellow-eyed-grass	T	

Bryophytes

<i>Plagiobryum zieri</i>	A Moss	E	
<i>Sphagnum subfulvum</i>	A Peatmoss	E	

State Status - Legal protection under Vermont Endangered Species Law (10 V.S.A. Chap. 123)

E = Endangered: in immediate danger of becoming extirpated in the state

T = Threatened: with high possibility of becoming endangered in the near future

Federal Status - Legal protection under the federal Endangered Species Act, U.S. Fish & Wildlife Service

E = Endangered

T = Threatened

⁵ Listed on 10 February 2022.

APPENDIX B

Section 106 Consultation



December 18, 2024

Ms. Laura Trieschmann
State Historic Preservation Officer
Vermont Agency of Commerce & Community
Division for Historic Preservation
One National Life Drive,
Deane C. Davis Building, 6th floor
Montpelier, VT 05620-0501

Re: Section 106 Consultation Initiation
New Terminal Building
Environmental Assessment
Middlebury State Airport (6B0)
Middlebury, VT

Dear Ms. Trieschmann,

The Vermont Agency of Transportation (VTrans), with funding from the Federal Aviation Administration (FAA), is preparing an Environmental Assessment (EA) for the construction of a new terminal building at Middlebury State Airport (6B0) in Middlebury, Vermont. The project includes the development of a small single-story terminal building (approximately 1,800 square feet) and the relocation of vehicle parking and fencing. Based on the location of the development and available funding, the project may also include the following components:

- Relocation of an existing covered patio
- Minor aircraft apron expansion
- Installation of electric vehicle (EV) charging stations for vehicles and aircraft
- Extension of 3-phase power service
- Installation of 6 additional aircraft tie downs
- Resurfacing of an existing apron

Each of these project components will be evaluated as part of the EA. As identified in the Airport Master Plan (2023), the airport does not currently have a public terminal building. The addition of a new terminal building will accommodate existing light general aviation activity. All proposed work will remain on airport property. Two locations are being evaluated for development. These locations are shown in Figure 1, Figure 2, and Figure 3 (attached).

The FAA has determined that the Sponsor's Proposed Action is an undertaking under Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and as such, is initiating the Section 106 consultation process consistent with the NHPA and its implementing regulations (36 CFR §800). This Section 106 review is being coordinated with the National Environmental Policy Act (NEPA) process, pursuant to 36 CFR 800.8(a). Through this coordination, the NEPA scoping process and other public notices and meetings will be used to solicit participation from the public and other stakeholders and to seek input and information regarding the identification of, and potential effects to, historic properties associated with this undertaking.

Location: 6B0 is located at 467 Airport Rd in the town of Middlebury, Addison County, Vermont. The Airport is situated on roughly 156 acres of land approximately 3 miles southeast of downtown Middlebury. Two locations are being evaluated for development. Both locations are contained to airport property.

Description of Undertaking: The Proposed Action involves the construction of a new terminal building and surface vehicle parking, patio relocation, apron expansion, airfield fence relocation, EV charging station installation, 3-phase power service extension, the installation of 6 additional aircraft tie downs, and resurfacing of an existing apron. The new development would be consistent with existing airport development in the area.

Area of Potential Effects: The Area of Potential Effects (APE), as defined in 36 CRF 800.16(d), is “*the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist*”. The effects of this project are related to ground disturbance and visual impacts to surrounding properties. For archaeological resources, the APE was limited to the project’s physical disturbance and for historic above-ground structures, the APE was limited to the viewshed of the development (see Figure 4 and Figure 5). This early coordination invites your comments to aid in the identification of historic properties and/or cultural resources that may be present within the proposed APE.

The EA process will analyze alternatives and disclose the potential for environmental impacts that could directly or indirectly occur as a result of the Proposed Action. The FAA is the lead federal agency and will ultimately issue an environmental finding on the Proposed Action. The EA document will be prepared in accordance with the NEPA and FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures* and *Environmental Desk Reference for Airport Actions*.

Please send any written comments to the following address:

Attn: Taylor Koutropoulos
201 N. Illinois St.
Suite 800
Indianapolis IN, 46204

We hope the information contained herein is sufficient for you to complete your evaluation. Should you have any questions, please contact me at (317) 493-3321 or by email at tkoutropoulos@chasolutions.com.

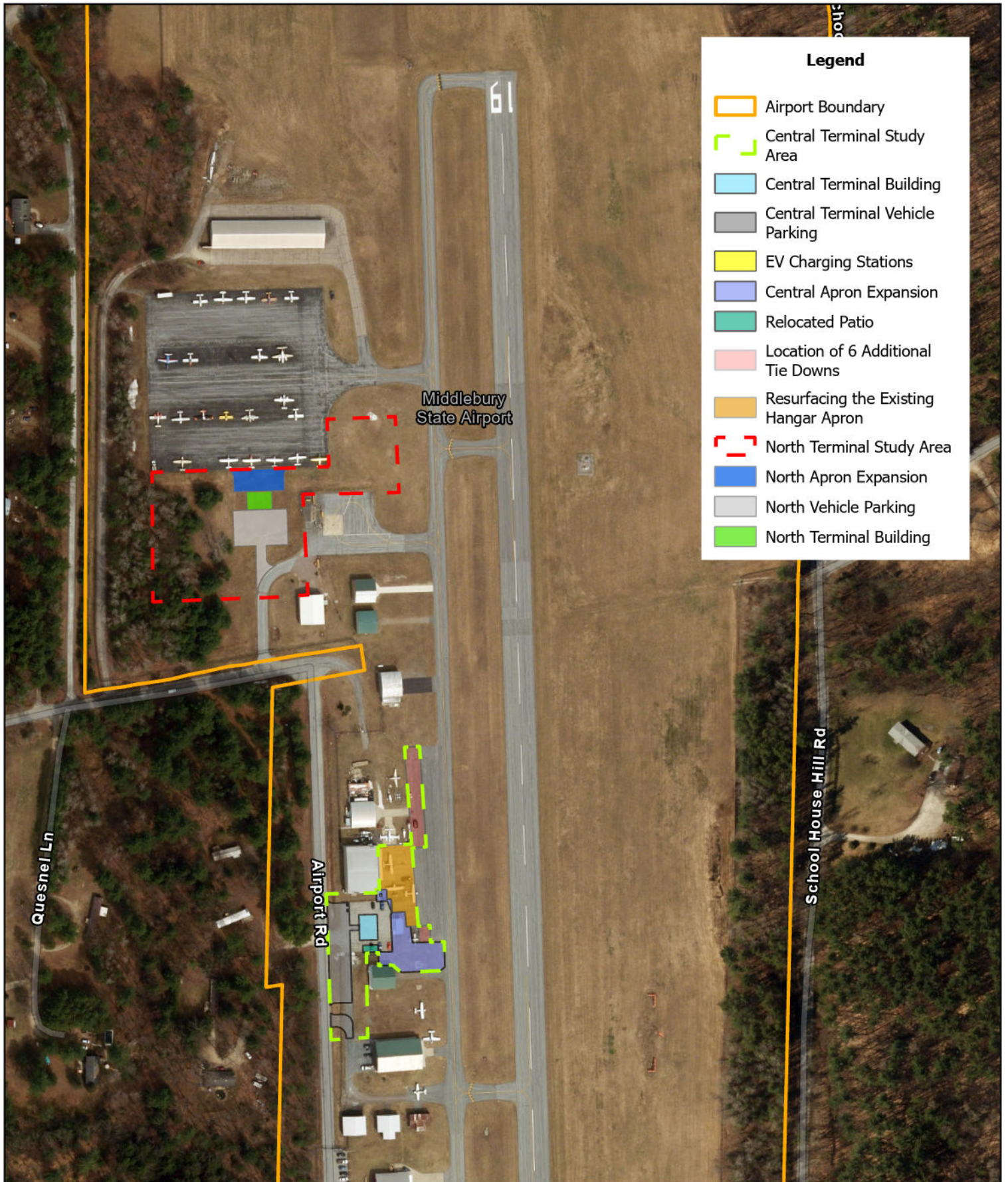
Sincerely,



Taylor Koutropoulos, ENV SP
Assistant Project Manager

Cc: John Nummy, VTrans
Cheryl Quaine, FAA New England Region



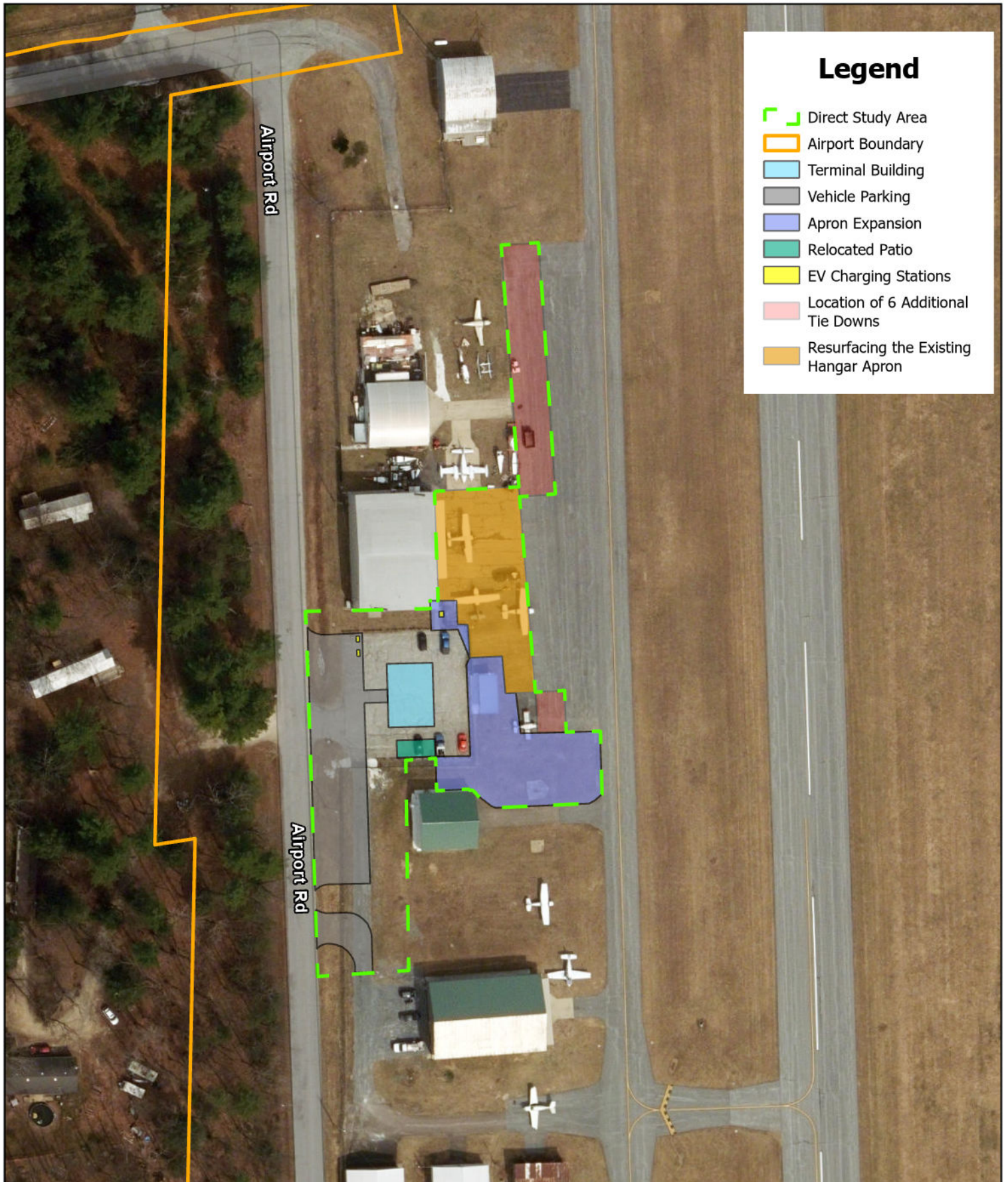


1' = 250"

CHA No.
087308

Figure 1:
Central and North Terminal Location
Middlebury State Airport
Middlebury, Vermont

Source Data
Middlebury State Airport (6B0) Master Plan



1" = 100'

CHA No.
087308

Figure 2:
Central Terminal Location

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan

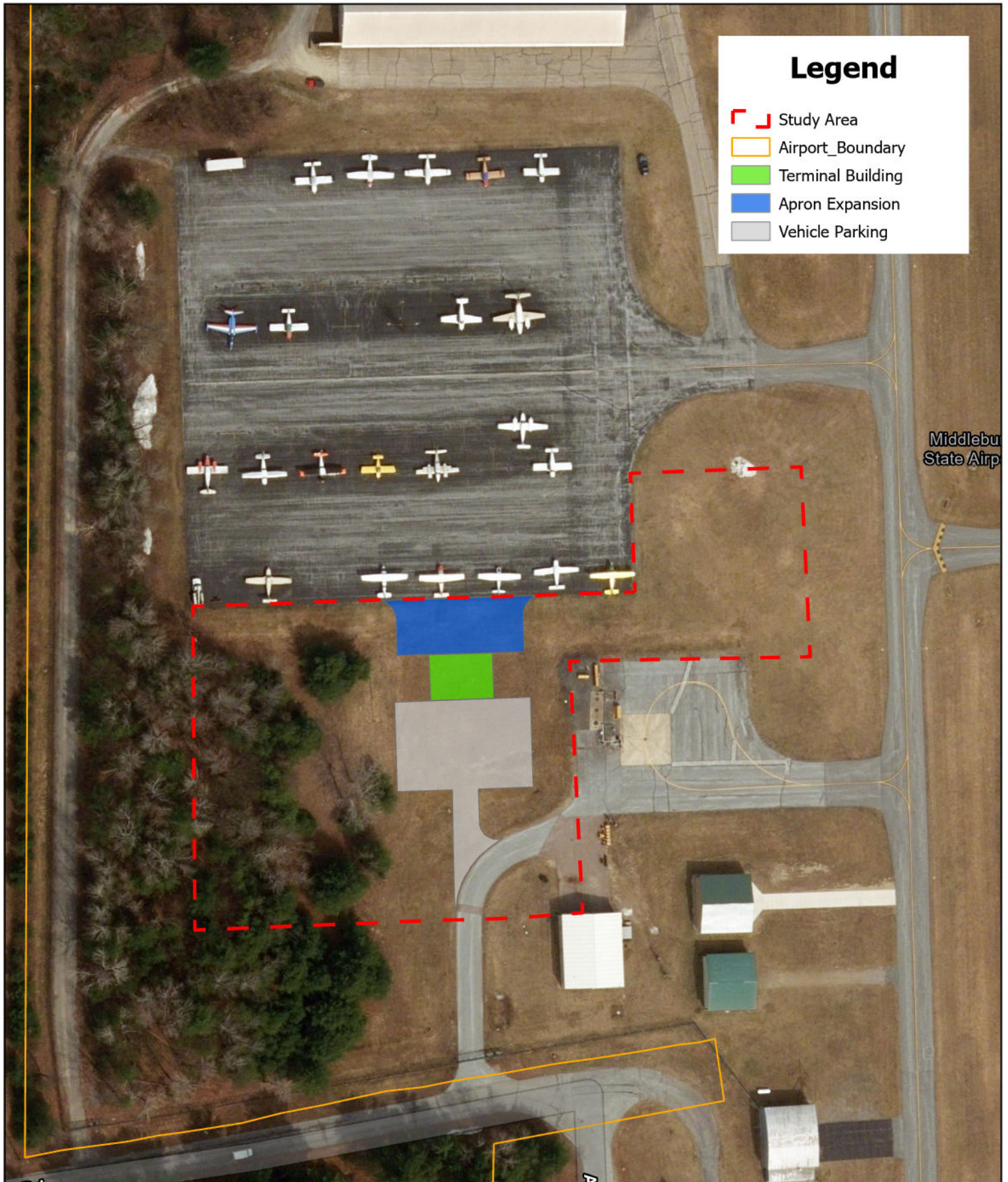


Figure 3:
North Terminal Location

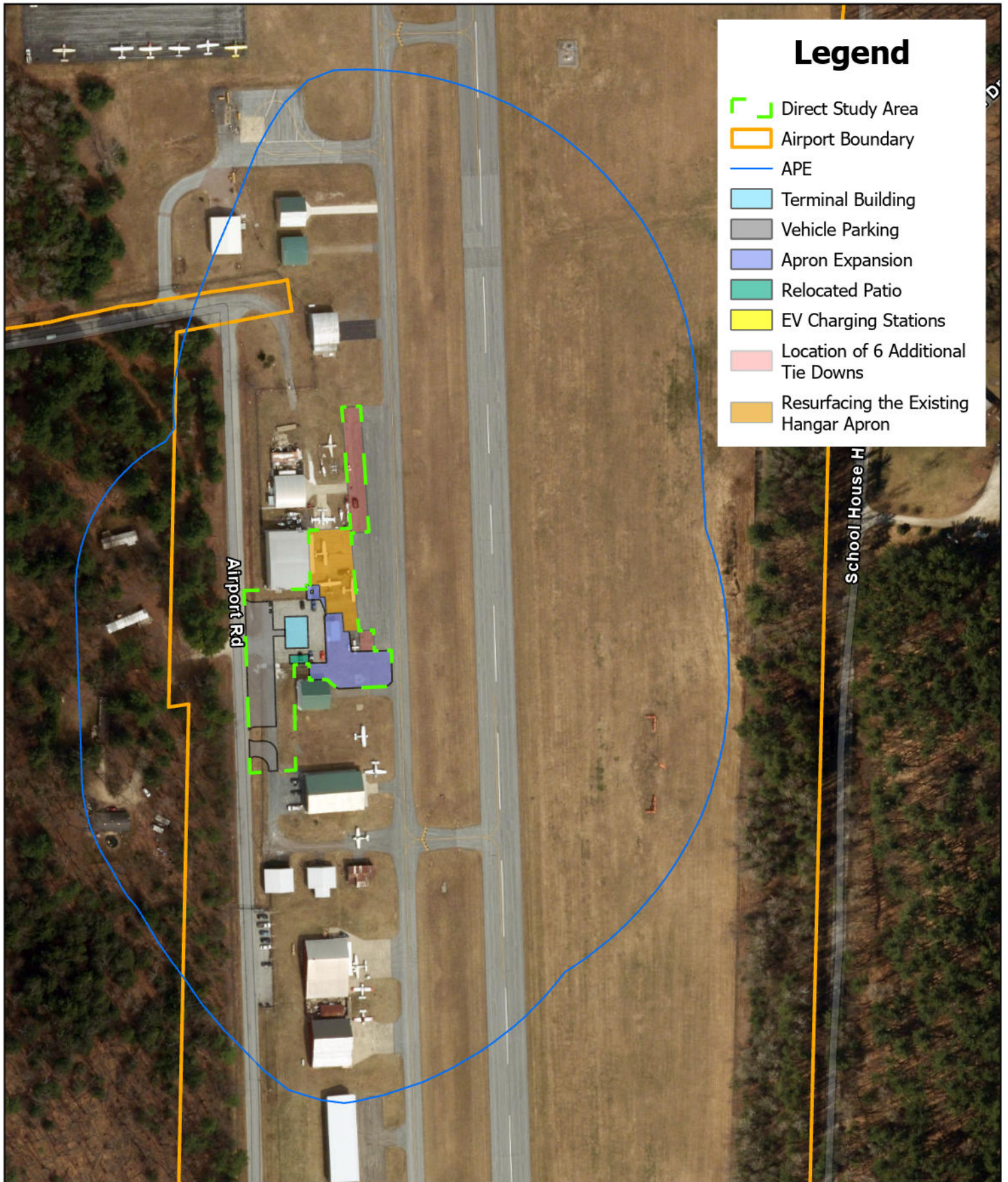
Middlebury State Airport
Middlebury, Vermont

Source Data
Middlebury State Airport (6B0) Master Plan



1' = 100"

CHA No.
087308

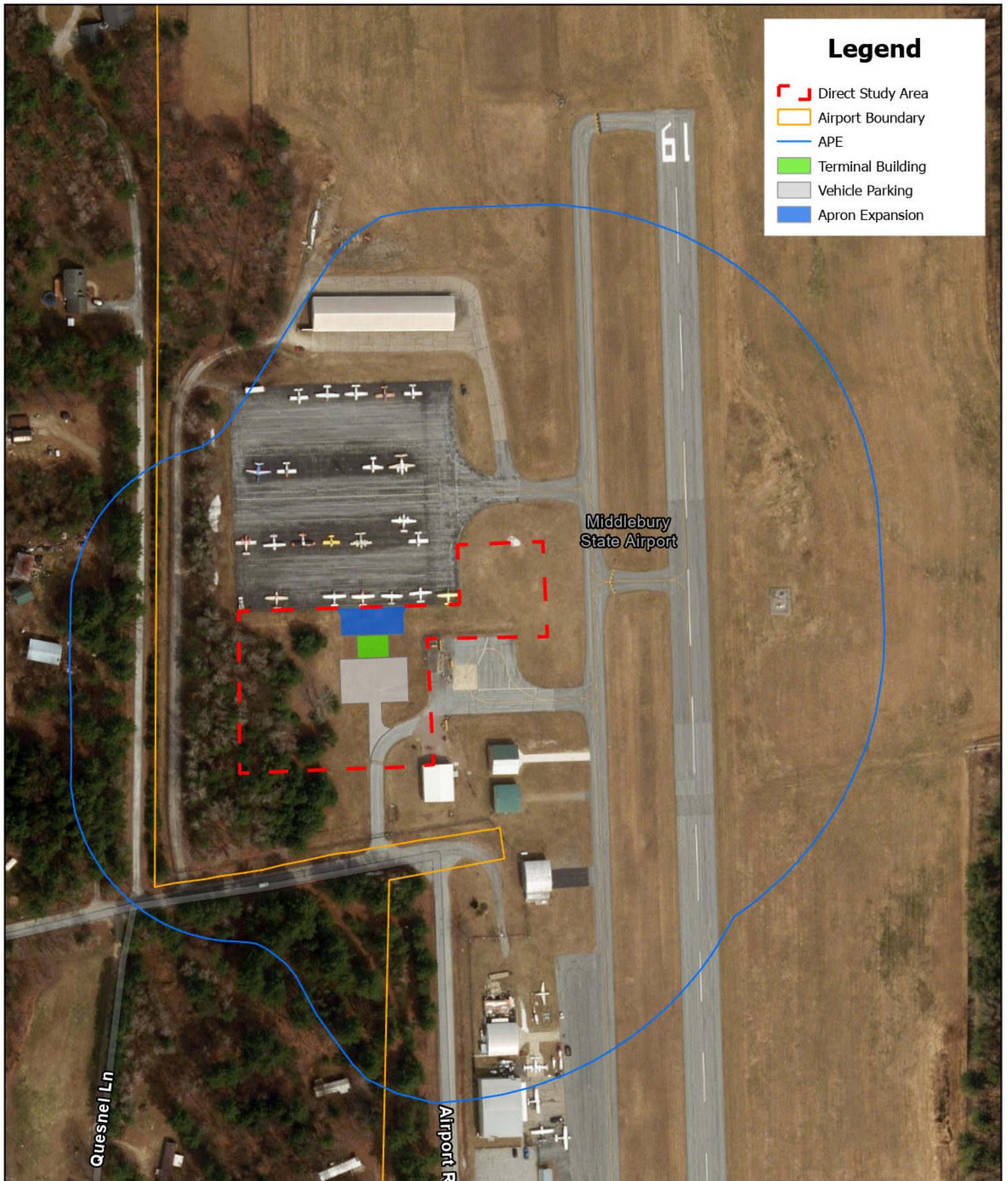


1" = 200"

CHA No.
087308

Figure 4:
Central Terminal Location APE
Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan



1' = 200"

CHA No.
087308

Figure 5:
North Terminal Location APE
Middlebury State Airport
Middlebury, Vermont

Source Data
Middlebury State Airport (6B0) Master Plan

Koutropoulos, Ashley

From: Socinski, Greg <Greg.Socinski@vermont.gov>
Sent: Friday, January 17, 2025 5:25 PM
To: Koutropoulos, Ashley
Subject: [--EXTERNAL--]: RE: Section 106 Consultation Initiation for New Terminal Building Environmental Assessment
Attachments: Middlebury_HistoricSurvey_Airport.pdf

Hi Ashley,

Thanks for submitting this for review, I am wondering if you have labelled photos of the buildings within the APE as well as their dates of construction. The only documentation I have of this property is a historic survey from some years back (attached). Let me know, thanks.

Greg Socinski | Historic Resources Specialist
Vermont Division for Historic Preservation
1 National Life Drive, Davis Bldg, 6th Floor | Montpelier, VT 05620
802 636 7413
greg.socinski@vermont.gov

From: Koutropoulos, Ashley <AKoutropoulos@chasolutions.com>
Sent: Wednesday, December 18, 2024 3:40 PM
To: ACCD - Project Review <ACCD.ProjectReview@vermont.gov>
Cc: Quaine, Cheryl J (FAA) <cheryl.j.quaine@faa.gov>; Nummy, John <John.Nummy@vermont.gov>; Heckroth, Mark <MHeckroth@chasolutions.com>; Koutropoulos, Taylor <TKoutropoulos@chasolutions.com>
Subject: Section 106 Consultation Initiation for New Terminal Building Environmental Assessment

Some people who received this message don't often get email from akoutropoulos@chasolutions.com. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Trieschmann,

On behalf of the Vermont Agency of Transportation and the Federal Aviation Administration, I am providing this Section 106 consultation letter for your review (see attached) in reference to an Environmental Assessment for the construction of a new terminal building at Middlebury State Airport. Please let me know if you have any questions.

Thank you.

Ashley Koutropoulos, ENV SP
Environmental Planner
CHA
Office: (317) 493-3334
akoutropoulos@chasolutions.com
www.chasolutions.com

HISTORIC PRESERVATION PROJECT REVIEW COVER FORM

Please complete this form and attach it to the top of all information submitted to this office for review. Accurate and complete forms will assist in the timely processing and response to your request. Submit the completed form and supporting materials to the Project Review Inbox at ACCD.ProjectReview@Vermont.gov.

1. DOES THIS INFORMATION RELATE TO A PREVIOUSLY SUBMITTED PROJECT? Please check box.

- ☐ If you have checked this box and noted the previous Project Review (PR) number assigned by this office you do not need to continue unless any of the required information below has changed.

1a. PREVIOUS PROJECT REVIEW NUMBER or PROJECT NAME

TOWN

COUNTY

2. IS THIS A NEW PROJECT?

Please check box

- ☐ If you have checked this box you will need to complete ALL of the following information

Project Name

Location

You MUST include street number, street name and/or County, State or Interstate route number if applicable.

Point Data

GIS Coordinates/Location Information/UTM Latitude-Longitude

City/Town/Village

List the correct city/town/village in which your project is being undertaken.

County

If the undertaking covers multiple towns/counties please email a list defining all towns/counties included with your digital submission at ACCD.Projectreview@vermont.gov.

PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PROJECT (include a more detailed summary or cover letter describing the details of your project as an attachment.)

The Historic Preservation Review Process in Vermont

In order to insure that historic preservation is carefully considered in publicly-funded or permitted undertakings, there are laws at each level of government that require projects to be reviewed for their potential impact/effect on historic properties.

These laws include:

- **10 V.S.A. Chapter 151 - Act 250/Criterion 8** - For projects requiring a new Act 250 permit or an amendment to an existing permit.
- **Section 248** - Public Service Board - For projects requiring a Certificate of Public Good.
- **22 V.S.A. Chapter 14** -The Vermont Historic Preservation Act - For projects with state involvement in the form of funding, licenses or permits.
- **Section 106 of the National Historic Preservation Act of 1966** - For projects with federal involvement in the form of funding, licenses or permits.

Regulations on line at: <http://accd.vermont.gov/historic-preservation/resources-rules>

Project review consists of identifying a project's potential impacts to historic buildings and structures, historic districts, historic landscapes and settings, and to known or potential archaeological resources. Project review is a consultative process between the applicant and the Division. Applicants are encouraged to contact our office as early as possible in the project planning process. We can assist in identifying historic resources in the project area and provide guidance on how to evaluate and avoid potential adverse effects to those resources as an outcome of the project. While protecting historic resources, this can save you time and money in the development of your project.

TYPE OF REVIEW REQUIRED/REQUESTED (Please answer both questions)

1. Does this action involve a permit approval or funding, now or ultimately from any other governmental agency?

☐ **Yes** ☐ **No** If yes, list agency name(s) and permit(s)/approval(s) ☐ **Don't Know Yet**

Agency Involved

- ☐ Section 106 ☐ Section 248 - PSB
☐ 22 VSA ☐ Other
☐ Act 250

2. Does the project site involve or is it near a property listed or recommended for listing in the Vermont State or National Registers of Historic Places? ☐ **Yes** ☐ **No** ☐ **Unknown**

ALL PROJECTS SUBMITTED FOR REVIEW SHOULD INCLUDE THE FOLLOWING MATERIALS

- ☐ **Project Description** – Attach a full description of the nature and extent of the work to be undertaken as part of this project. Relevant portions of project applications to other state and/or federal agencies and environmental statements may be submitted if applicable.
- ☐ **Location Map** - Include a map locating the project in the community. The map must clearly show street and road names surrounding the project area as well as the location of all portions of the project. Appropriate maps to include are USGS quadrangle map or google map.

See Section 106 Consultation Letter sent 12/18/2024 for project description, location, and site/project plans.

- ☐ **Site Plan** – The site plan should include the project boundaries and areas of proposed excavation and construction, as applicable.
 - ☐ **Project Plans** – Architectural and/or engineering plans drawings, etc.
 - ☐ **Photographs** - Photographs may be scanned black-and-white prints, digital images, color prints or color photo copies; save them as either JPEGs or in a PDF format. Standard (black & white) photocopies are not accepted.
- *See attached - 2017 Historic Resource Review

Architecture

Are there any **resource(s)** (buildings, structures such as bridges, walls, culverts, and objects), districts or landscapes within the project area? ☐ Yes ☐ No If no, please skip to the Archaeology section.

If yes, please submit the following information: To research a building click on the link to access our [Online Research Center](#)

A covered patio/pavilion is located within the project area.

- ☐ The resource is 50 years old or older - Approximate age(s):
- ☐ The resources(s) are listed in the State or National Register of Historic Places
 - ☐ Individually ☐ part of a historic district ☐ Unknown
- ☐ Photographs of **each** resource or streetscape within the project area, with captions, along with a photo key. (Digital photographs are accepted. All photographs must be clear, crisp and focused.)
- ☐ If the project involves rehabilitation, demolition, additions, or alterations to existing buildings or structures, provide additional photographs showing detailed project work locations. (i.e. Detail photo of windows if window replacement is proposed.)

Archaeology

Does the proposed undertaking involve ground-disturbing activity? ☐ Yes ☐ No

If yes, please submit the following information:

- ☐ Description of current and previous land use and disturbance.
- ☐ Available information concerning known or suspected archaeological resources within the project area (such as cellar holes, wells, foundations, dams, etc.)

Please note that for many projects an architectural and/or archaeological survey or other additional information may be needed to complete the review process.

CONTACT PERSON FOR PROJECT

A Historic Resource Review will be completed in July 2025 as an addendum to the 2017 study (attached).

Name & Title			
Firm/Agency			
Address			
City		State	
Phone			
email			

**HISTORIC RESOURCES REVIEW OF AIRPORT PERIMETER FENCING:
CALEDONIA COUNTY AIRPORT, LYNDONVILLE, CALEDONIA COUNTY, VERMONT,
MIDDLEBURY STATE AIRPORT, MIDDLEBURY, ADDISON COUNTY, VERMONT,
MORRISVILLE-STOWE STATE AIRPORT, MORRISVILLE, LAMOILLE COUNTY,
VERMONT**



Caledonia County State Airport Terminal



Middlebury State Airport Terminal



Morrisville-Stowe State Airport Terminal

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Consulting Archaeology Program
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Burlington, VT 05405

Report No. 1059

April 25, 2017

**HISTORIC RESOURCES REVIEW OF AIRPORT PERIMETER FENCING:
CALEDONIA COUNTY AIRPORT, LYNDONVILLE, CALEDONIA COUNTY, VERMONT,
MIDDLEBURY STATE AIRPORT, MIDDLEBURY, ADDISON COUNTY, VERMONT,
MORRISVILLE-STOWE STATE AIRPORT, MORRISVILLE, LAMOILLE COUNTY,
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Report No. 1059

April 25, 2017

TABLE OF CONTENTS

LIST OF FIGURES	ii
INTRODUCTION	1
CALEDONIA COUNTY STATE AIRPORT	4
Project Location and Description.....	4
Historic Background	4
Airport Buildings	10
Nearby Historic Resources	38
Recommended Significance and Determination of Effect.....	45
MIDDLEBURY STATE AIRPORT	47
Project Location and Description.....	47
Historic Background	47
Airport Buildings	48
Nearby Historic Resources	48
Recommended Significance and Determination of Effect.....	48
MORRISVILLE-STOWE STATE AIRPORT	65
Project Location and Description.....	65
Historic Background	65
Airport Buildings	72
Nearby Historic Resources	72
Recommended Significance and Determination of Effect.....	94
SUMMARY	95
REFERENCES CITED.....	97

LIST OF FIGURES

Figure 1. Map showing the location of the Caledonia County State Airport located in Lyndonville, Caledonia County, Vermont; the Middlebury State Airport, located in Middlebury, Addison County, Vermont; and the Morrisville-Stowe State Airport, located in Morrisville, Lamoille County, Vermont.	2
Figure 2. Image of typical chain link fencing to be installed during project work (image provided by VTrans).	3
Figure 3. Map showing the location of the Caledonia County State Airport, Lyndonville, Caledonia County, Vermont (map provided by VTrans).	5
Figure 4. Aerial view of the Caledonia County State airport, facing northeast (http://vtrans.vermont.gov/aviation/airports/caledonia-county)	6
Figure 5. View northwest of the Caledonia County State airport along Pudding Hill Road.	6
Figure 6. Preliminary fence layout plan for the Caledonia County State Airport, Lyndonville, Caledonia County, Vermont (plan provided by VTrans).	7
Figure 7. Preliminary terminal area plan for the Caledonia County State Airport, Lyndonville, Caledonia County, Vermont (plan provided by VTrans).	8
Figure 8. Preliminary fence layout plan for the Caledonia County State Airport, Lyndonville, Caledonia County, Vermont (image provided by VTrans).	9
Figure 9. Image of the Caledonia County State Airport with buildings identified.	11
Figure 10. View southeast of buildings at the Caledonia County State Airport.	12
Figure 11. View northeast of buildings at the Caledonia County State Airport.	12
Figure 12. View north of buildings at the Caledonia County State Airport.	13
Figure 13. View southeast of terminal/hangar at the Caledonia County State Airport.	13
Figure 14. View southeast of the EAA/Civil Air Patrol hangar at the Caledonia County State Airport.	14
Figure 15. View southeast of the northernmost hangars at the Caledonia County State Airport.	14
Figure 16. View southeast of the southernmost hangar at the Caledonia County State Airport.	15
Figure 17. View northeast of hangar (“blue”) near southern end of the Caledonia County State Airport.	15
Figure 18. View northeast of T- hangars at the Caledonia County State Airport.	16
Figure 19. View northeast of front sides of T- hangars at the Caledonia County State Airport.	16
Figure 20. View northeast of front sides of T- hangars at the Caledonia County State Airport.	17
Figure 21. View northeast of rear sides of T- hangar at the Caledonia County State Airport.	17
Figure 22. Detail of H.F. Walling’s <i>Map of Caledonia County, Vermont</i> (1858), with the approximate location of the Caledonia County State Airport added.	18

Figure 23. Detail of the map of Lyndon from F.W. Beers' <i>County Atlas of Caledonia, Vermont</i> (1875), with the approximate location of the Caledonia County State Airport added.	19
Figure 24. Detail of an aerial photograph, with the Pudding Hill School location indicated, showing the area of the Caledonia County State Airport in 1962 prior to its construction, (Geotechnics & Resources Inc., 1962a).	20
Figure 25. Detail of an aerial photograph, with the Pudding Hill School location indicated, showing the area of the Caledonia County State Airport in 1975 (AreoGraphics Corp., 1975); note relocation of road and school (see Figure 24).	21
Figure 26. View northwest of the Pudding Hill School at the Caledonia County State Airport.	22
Figure 27. View southwest of the Pudding Hill School at the Caledonia County State Airport.	22
Figure 28. View southwest of the Pudding Hill School at the Caledonia County State Airport.	23
Figure 29. View southeast of the Pudding Hill School at the Caledonia County State Airport. .	23
Figure 30. View north of the Pudding Hill School at the Caledonia County State Airport.....	24
Figure 31. View of windows along the east elevation of the Pudding Hill School at the Caledonia County State Airport.....	24
Figure 32. View north into the Pudding Hill School from the main entry door; entryway in foreground.....	25
Figure 33. View toward the west wall of the main room in the Pudding Hill School.	25
Figure 34. View toward the southeast corner of the main room in the Pudding Hill School; main entry door at right.	26
Figure 35. View toward the southwest corner of the main room in the Pudding Hill School.	26
Figure 36. View toward the north wall of the main room in the Pudding Hill School, from the enclosed entryway.	27
Figure 37. View north of bank of windows along east wall of the main room in the Pudding Hill School.	28
Figure 38. Built-in cabinets in small room in addition at the Pudding Hill School.....	29
Figure 39. Small room in addition at the Pudding Hill School; note built-in cabinets and bead board wall covering.	29
Figure 40. Small room in addition at the Pudding Hill School; note bead board wall and ceiling covering.	30
Figure 41. Exposed split plaster and lath wall at the Pudding Hill School.....	31
Figure 42. Exposed wood sheathing along the west wall of the main block of the Pudding Hill School, visible from within the addition; the wall may be a former exterior wall with a window opening, in place prior to the construction of the addition.	31
Figure 43. Advertisement for the Esline Company from the April 6, 1929, edition of the magazine <i>Aviation</i>	33

Figure 44. The Caledonia County State Airport’s Esline hangar at the Burlington Municipal Airport in 1934 (Louis L. McAllister Photograph Collection, “A” Collection, Burlington Airport 1934-1935, Special Collections, University of Vermont, Burlington, Vermont).	34
Figure 45. The old Burlington Esline hangar being rebuilt at the Caledonia County State Airport in Lyndon in 1976 (<i>Burlington Free Press</i> February 15, 1976, photo credit Jan Herman). .	34
Figure 46. View north of terminal/Esline hangar at the Caledonia County State Airport.	35
Figure 47. View northwest of terminal/Esline hangar at the Caledonia County State Airport. ..	35
Figure 48. View northeast of terminal/Esline hangar at the Caledonia County State Airport.	36
Figure 49. View southeast of terminal/Esline hangar at the Caledonia County State Airport. ...	36
Figure 50. View of interior metal frame in terminal/Esline hangar at the Caledonia County State Airport.	37
Figure 51. View of interior metal roof trusses in terminal/Esline hangar at the Caledonia County State Airport.	37
Figure 52. Image showing the location of historic and former historic properties located nearby the Caledonia County State Airport.	39
Figure 53. View north of the Ray/Easterbrooks farm complex from within the Caledonia County State Airport.	40
Figure 54. View northwest of the house at the Ray/Easterbrooks farm complex from Pudding Hill Road.	40
Figure 55. View southwest of the Ray/Easterbrooks farm complex from Pudding Hill Road.	41
Figure 56. View north of the Proctor farm complex along Pudding Hill Road.	42
Figure 57. View northwest of the house at the Proctor farm complex on the west side of Pudding Hill Road.	42
Figure 58. View northeast of the barn complex at the Proctor farm complex on the east side of Pudding Hill Road.	43
Figure 59. View northeast of the main barn complex at the Ruggles farm complex on the east side of Pudding Hill Road.	44
Figure 60. View southwest of the former historic Parker farm complex on the south side of Airport Road.	45
Figure 61. Map showing the location of the Middlebury State Airport, Middlebury, Addison County, Vermont (map provided by VTrans).	49
Figure 62. Aerial view of the Middlebury State airport, facing northeast (http://vtrans.vermont.gov/aviation/airports/middlebury)	50
Figure 63. View north of Middlebury State airport along Airport Road.	50
Figure 64. Preliminary fence layout plan for the Middlebury State Airport, Middlebury, Addison County, Vermont (plan provided by VTrans).	51

Figure 65. Preliminary terminal area plan for the Middlebury State Airport, Addison County, Caledonia, Vermont (plan provided by VTrans).	52
Figure 66. Preliminary fence layout plan for the Middlebury State Airport, Middlebury, Addison County, Vermont (image provided by VTrans).....	53
Figure 67. Image of the Middlebury State Airport with buildings identified.....	54
Figure 68. View northwest of buildings at the Middlebury State Airport.	55
Figure 69. View southwest of buildings at the Middlebury State Airport.....	55
Figure 70. View southwest of buildings at the Middlebury State Airport.....	56
Figure 71. View northwest of buildings at the Middlebury State Airport.	56
Figure 72. Detail of an aerial photograph taken in 1962, showing the Middlebury State Airport, with airport buildings indicated (Geotechnics & Resources Inc., 1962b).	57
Figure 73. Detail of an aerial photograph taken in 1974, showing the Middlebury State Airport, with airport buildings indicated (Aerographics Corp., 1974).	58
Figure 74. View northwest of the northernmost hangar at the Middlebury State Airport.....	59
Figure 75. View southwest of the garage at the Middlebury State Airport.	59
Figure 76. View southwest of hangar at the Middlebury State Airport.....	60
Figure 77. View southwest of arched roof hangar at the Middlebury State Airport.	60
Figure 78. View southwest of smaller arched roof hangar at the Middlebury State Airport.....	61
Figure 79. View northwest of terminal/hangar at the Middlebury State Airport.....	61
Figure 80. View southwest of hangar at the Middlebury State Airport.....	62
Figure 81. View northwest of hangar at the Middlebury State Airport.	62
Figure 82. View southwest of hangars at the Middlebury State Airport; T-hangars at left and center.....	63
Figure 83. View northwest of hangars at the Middlebury State Airport; T-hangars at right and center.....	63
Figure 84. View southwest of hangars at the Middlebury State Airport	64
Figure 85. View southwest of southernmost hangar at the Middlebury State Airport.	64
Figure 86. Map showing the location of the Morrisville-Stowe State Airport, Morrisville, Lamoille County, Vermont (map provided by VTrans).	66
Figure 87. View north of Morrisville-Stowe State Airport along VT Route 100.....	67
Figure 88. View south of Morrisville-Stowe State Airport along VT Route 100.....	67
Figure 89. Preliminary fence layout plan for the Morrisville-Stowe State Airport, Morrisville, Lamoille County, Vermont (plan provided by VTrans).	68
Figure 90. Preliminary terminal area plan for the Morrisville-Stowe State Airport, Morrisville, Lamoille County, Vermont (plan provided by VTrans).	69

Figure 91. Preliminary fence layout plan for the Morrisville-Stowe State Airport, Morrisville, Lamoille County, Vermont (image provided by VTrans).	70
Figure 92. Detail of an aerial photograph showing the Morrisville-Stowe State Airport in 1963, during paving operations (Geotechnics & Resources Inc., 1963).	71
Figure 93. Image of the Morrisville-Stowe State Airport with buildings identified.	73
Figure 94. View north of northernmost buildings at the Morrisville-Stowe State Airport.....	74
Figure 95. View southwest of buildings at the Morrisville-Stowe State Airport.	74
Figure 96. View northwest of buildings at the Morrisville-Stowe State Airport.....	75
Figure 97. View southwest of southernmost buildings at the Morrisville-Stowe State Airport..	75
Figure 98. View northwest of hangars and garage at the northern end of the Morrisville-Stowe State Airport.....	76
Figure 99. View northeast of hangars at the northern end of the Morrisville-Stowe State Airport.	76
Figure 100. View west of hangar at the Morrisville-Stowe State Airport.	77
Figure 101. View southwest of hangars at the Morrisville-Stowe State Airport.....	77
Figure 102. View southwest of hangar and terminal at the Morrisville-Stowe State Airport.	78
Figure 103. View west of terminal at the Morrisville-Stowe State Airport.....	78
Figure 104. View southwest of hangars at the southern end of the Morrisville-Stowe State Airport.....	79
Figure 105. View southwest of southernmost hangar at the Morrisville-Stowe State Airport....	79
Figure 106. Detail of H.F. Walling’s <i>Map of the Counties of Orleans, Lamoille and Essex, Vermont</i> (1859), with the approximate location of the Morrisville-Stowe State Airport added.....	80
Figure 107. Detail of the map of Morristown in F.W. Beers’ <i>Atlas of the Counties of Lamoille and Orleans, Vermont</i> (1878), with the approximate location of the Morrisville-Stowe State Airport added.	81
Figure 108. Image showing the location of former historic properties located nearby the Morrisville-Stowe State Airport.	82
Figure 109. View northeast of the former Hill farmstead on the east side of VT Route 100.....	83
Figure 110. View northeast of the former Hill farmstead on the east side of VT Route 100.....	83
Figure 111. View northeast of the house at the former Hill farmstead on the east side of VT Route 100.....	84
Figure 112. View northeast of barn/shed at the former Hill farmstead on the east side of VT Route 100.....	84
Figure 113. Almon W. Griswold Sr. (posted by Lydia Welch 2014 to Ancestry.com).	85

Figure 114. The main farm buildings of the “Malvern Stock Farm” on the LaPorte Road in Morristown (<i>News and Citizen</i> July 4, 1890); note: all of the barns and outbuildings (right) burned in 1909 and the house burned in 1947.	85
Figure 115. View southwest of the former Malvern Farm location on the west side of VT Route 100.	87
Figure 116. View southwest of the house at the former Malvern Farm location on the west side of VT Route 100.	88
Figure 117. View northwest of the former Malvern Farm location on the west side of VT Route 100.	88
Figure 118. View southwest of gambrel roof barns at the former Malvern Farm location on the west side of VT Route 100.	89
Figure 119. View northwest of gambrel roof barns and silo at the former Malvern Farm location on the west side of VT Route 100.	89
Figure 120. View northwest of gable roof barn at the former Malvern Farm location on the west side of VT Route 100.	90
Figure 121. View west of former A.E. Smith or W.G. Ferrin house on the west side of VT Route 100, just south of the former Malvern Farm.	90
Figure 122. View northwest of former Webster/Chaffee house on the west side of VT Route 100.	92
Figure 123. View northeast of barns across from the former Webster/Chaffee house, on the east side of VT Route 100.	92
Figure 124. View northwest of former Webster/Rand house on the west side of VT Route 100.	93
Figure 125. View southeast of structures across from the former Webster/Rand house, on the east side of VT Route 100.	93

INTRODUCTION

The Vermont Agency of Transportation (VTrans), with assistance from C&S Engineers, Inc. and EIV Technical Services, proposes the installation of perimeter fencing, and associated work, at three airports: Caledonia County State Airport located in Lyndonville, Caledonia County, Vermont; Middlebury State Airport, located in Middlebury, Addison County, Vermont; and Morrisville-Stowe State Airport, located in Morrisville, Lamoille County, Vermont (Figure 1). The proposed projects will primarily include the installation of chain link fence at new locations and improvements to existing fence at each of the airports (Figure 2). The goal of the projects is to increase the safety of airport operations by providing secure facilities and reducing the probability of people and wildlife straying onto Air Operations Area (AOA) surfaces.

This Historic Resources Review was conducted to assist with compliance of Section 106 of the National Historic Preservation Act of 1966 and its amendments. The objective of the Historic Resources Review is to identify and document any historic resources on or eligible for listing on the National Register of Historic Places that have the potential to be directly or indirectly affected by project work, and if present, to recommend a determination of effect on the resources by the proposed project. The proposed projects were reviewed according to standards set forth in 36 CFR Part 800, the regulations established by the Advisory Council on Historic Preservation to implement Section 106. University of Vermont Consulting Archaeology Program (UVM CAP) Historic Preservation Specialist Catherine Quinn conducted field inspections of the project areas on April 11, 2017 (Middlebury) and on April 13, 2017 (Lyndonville and Morrisville). Current photographs were taken during the site visits. UVM CAP Program Historian, Kate Kenny, assisted with historic research and writing.

Research conducted for this review included a search of the collections of Wilbur Special Collections of the Bailey Howe Library at the University of Vermont, the Online Research Center of the Vermont Division for Historic Preservation, and the online Landscape Change Program of the University of Vermont. A wide variety of archival records were used in the preparation of this report including State Register files; historic maps, newspapers, aerial imagery, published town histories, census records, state records, vital records, and family genealogies.

Specific project work proposed at each airport is presented below. Resources at each airport are described and reviewed, along with any nearby historic resources that have the potential to be indirectly affected by the proposed fencing projects. Brief historic backgrounds are given, and recommendations for significance and determinations of effect are provided.

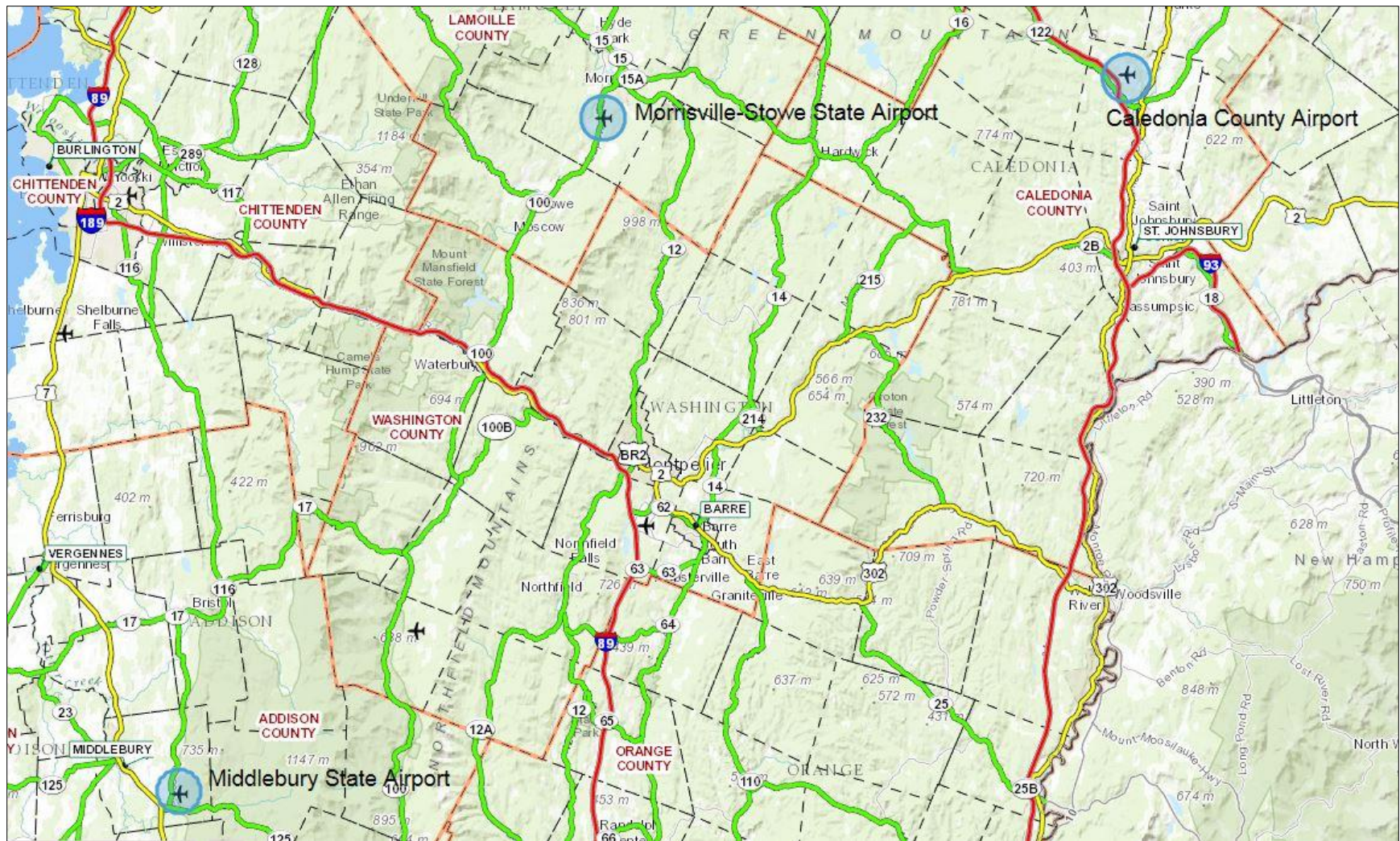


Figure 1. Map showing the location of the Caledonia County State Airport located in Lyndonville, Caledonia County, Vermont; the Middlebury State Airport, located in Middlebury, Addison County, Vermont; and the Morrisville-Stowe State Airport, located in Morrisville, Lamoille County, Vermont.



Figure 2. Image of typical chain link fencing to be installed during project work (image provided by VTrans).

CALEDONIA COUNTY STATE AIRPORT

Project Location and Description

Caledonia County State Airport is located in the town of Lyndonville, Caledonia County, in the northeast corner of Vermont (Figure 3). The airport is situated along the west side of Pudding Hill Road, northwest of the town center (Figures 4 and 5). As summarized by C&S Engineers, Inc., the proposed project will include (Figures 6 – 8) (C&S: 2017a):

- Removing approximately 100 LF of existing chain link fence and gates
- Removing (clearing and grubbing) approximately 3,800 SY of vegetation in upland areas
- Removing 350 SY of trees in wetlands
- Installation of approximately 1,600 LF of green PVC coated chain link fence without barbed wire (8 foot sections) with concrete foundations; approximately 5,250 LF green PVC coated chain link fence without barbed wire (8-foot sections) with drive anchors (resulting in 275' of fence installation in wetlands and 852' of fence installation in wetland buffer areas)
- Widening existing 18' wide access road to 24' to accommodate fuel trucks and a 24' wide gate; total new pavement area added is 70' x 6' or 420 sq. ft.
- Installation of: one 4-foot single swing pedestrian gate; four 16-foot double swing gates; two 24-foot single cantilever gates; one 30-foot single cantilever gate
- Installation of two mechanical gate operators on two of the single cantilever gates
- Trenching (1' width, 24" deep) for installation of approximately 70 LF of 2-inch diameter RGS conduit in pavement; Trenching (1' width, 24" deep) for installation of approximately 1,100 LF of 2-inch diameter PVC conduit in turf
- Installation of 2 electrical pullboxes
- Installation of 3 pipe culverts under the proposed fence (resulting in 1,000 sq. ft. of wetland disturbance)
- Restoration of project areas

Existing chain link fence is in place along the north perimeter of the airport, and along a portion of the east and west sides of the property; all new fencing will tie-in with existing fencing that is not being removed.

Historic Background

The initial planning for the Caledonia State Airport was undertaken in 1965 (*Burlington Free Press* April 12, 1965). This site was eventually chosen over the option of continuing to develop the airfield near St. Johnsbury because there was more room for expansion on Pudding Hill (*Burlington Free Press* April 12, 1965). The land (78 acres) was purchased by the State in 1968 and by 1970 the runway (originally 3,300 ft by 60 ft), the parking apron and taxiway had been built (*Burlington Free Press* February 15, 1976).

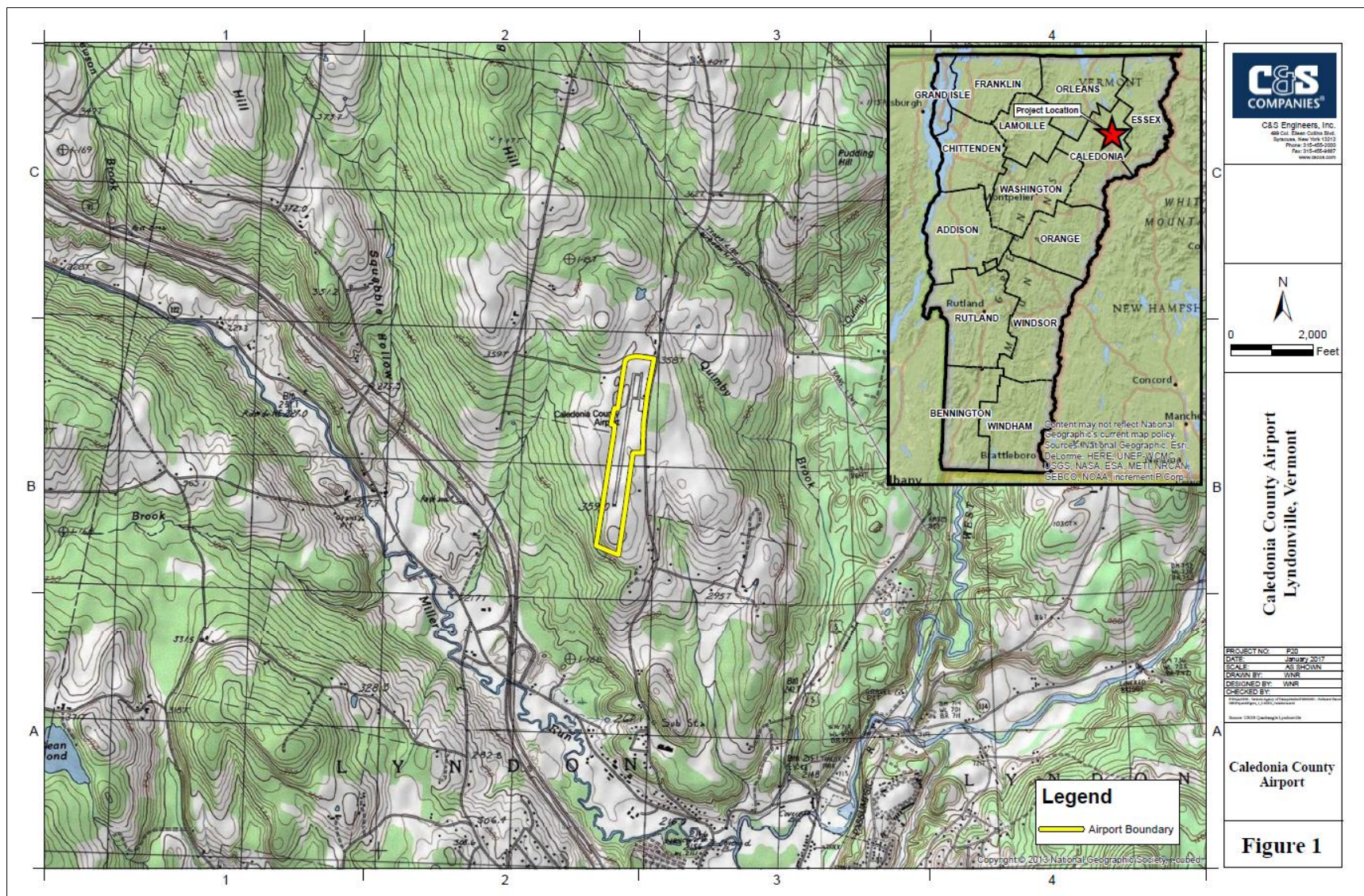


Figure 3. Map showing the location of the Caledonia County State Airport, Lyndonville, Caledonia County, Vermont (map provided by VTrans).



Figure 4. Aerial view of the Caledonia County State airport, facing northeast (<http://vtrans.vermont.gov/aviation/airports/caledonia-county>)



Figure 5. View northwest of the Caledonia County State airport along Pudding Hill Road.

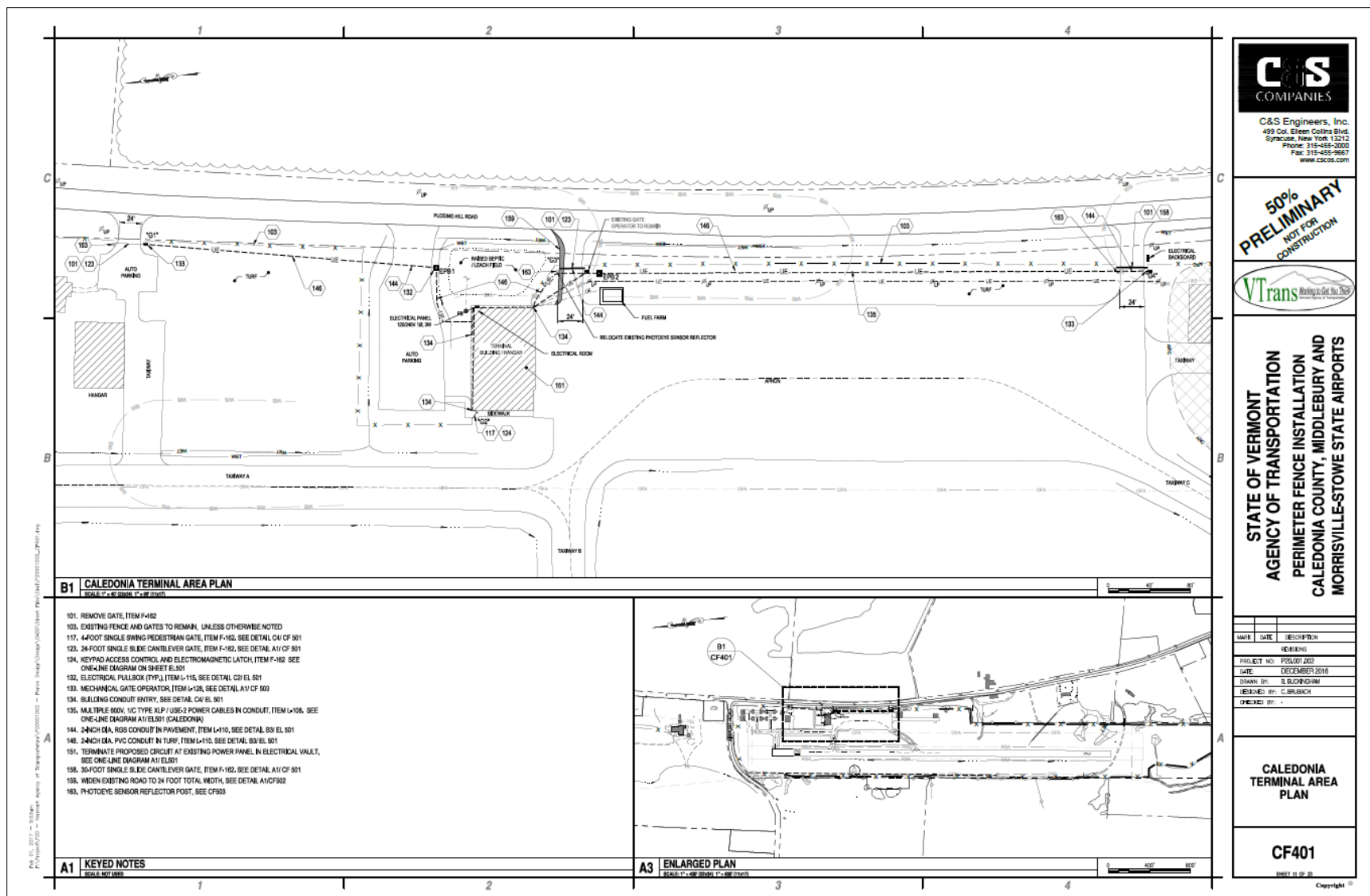


Figure 7. Preliminary terminal area plan for the Caledonia County State Airport, Lyndonville, Caledonia County, Vermont (plan provided by VTrans).

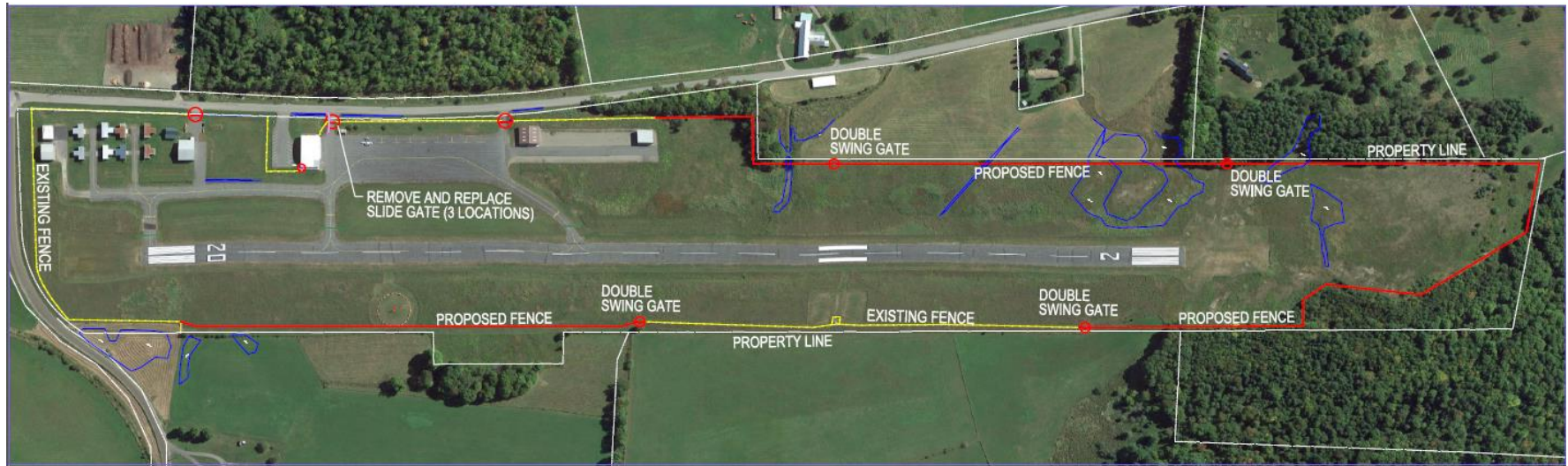


Figure 8. Preliminary fence layout plan for the Caledonia County State Airport, Lyndonville, Caledonia County, Vermont (image provided by VTrans).

Airport Buildings

There are currently 15 buildings located at the Caledonia County State Airport (Figures 9 – 13). Five of the structures are more recent, including: the Civil Air Patrol Building (signage now indicates it as “EAA”), built between 2003 and 2006 (Google Earth) (Figure 14); the northernmost two hangars, built between 1999 and 2003 (Google Earth) (on one airport plan dated 2000 they were labeled “under construction”) (Figure 15); the southernmost hangar, constructed between 2008 and 2009 (Google Earth) (Figure 16); and the large blue hangar near the southern end of the airport built between 2009 and 2011 (Google Earth) (Figure 17). Additional buildings were constructed earlier and are described below.

T-Hangars

The eight corrugated metal T-hangars, which are located near the northern end of the airport, were built between 1975 and 1999 (Figures 18 – 21). This group of hangars is situated along two separate taxiways with their entrances facing each other, so that the “tails” of the middle four hangars abut each other (see Figure 9). All eight of these corrugated metal buildings are “T” shaped, with double sliding doors and slightly sloped shed roofs.

The Pudding Hill School

The small, one room schoolhouse located within the airport property is the ca. 1870 Pudding Hill School (VTDHP 2006). A school has been in this area of Lyndon since at least the late 1790s. The Walling map shows a school building located slightly further to the west than the later Beers map, suggesting that a new building was built between ca. 1858 and 1875 (Figures 22 and 23). The Pudding Hill School operated for about 100 years, closing in 1965 (*Burlington Free Press* March 20, 1965). In 1968, the building was sold and in November of that year was relocated to its present site on the airport (when the town road, now Airport Road, was realigned to accommodate the airport) (Vermont Aeronautics Board 1970:15) (Figures 24 and 25). It was then renovated for use by the Civil Air Patrol, but is currently not in use.

The Pudding Hill School is a one story, gable roof building with a single story, shed roof ell on its west elevation and a projecting, enclosed gable roof entryway with gable hood centered on the primary façade, that protects a wood paneled entry door (Figures 26 – 31). The building has a standing seam metal roof and rests on a poured concrete foundation. It is sheathed in clapboards, has corner trim boards and narrow roofline trim. The east elevation has a bank of five 8/8 double hung wooden windows; three connected 12-pane fixed sash are on the north elevation; and the west wall of the addition has four individual windows, one of which appears to be an historic 6/6 double hung wooden sash. The enclosed entryway has two 6-pane fixed windows. A second, solid vertical board door enters the north wall of the shed addition. The interior of the building maintains its basic one room school house layout, though a room has been constructed at the rear (north side) of the building, that projects out into the main space (Figures 32 – 42). . Doors along the west wall lead into four small rooms contained within the shed roof addition. Most of the walls and ceilings of these small rooms are covered in painted beaded board wood siding. There is wainscoting on the lower portions of walls within the main room and entryway; top portions of the walls are primarily covered in false wood paneling. Split lath and plaster walls are visible where paneling is no longer in place. Ceiling tiles in the main room are modern and appear to be made of compressed fiber. Visible flooring is narrow strip floorboards.

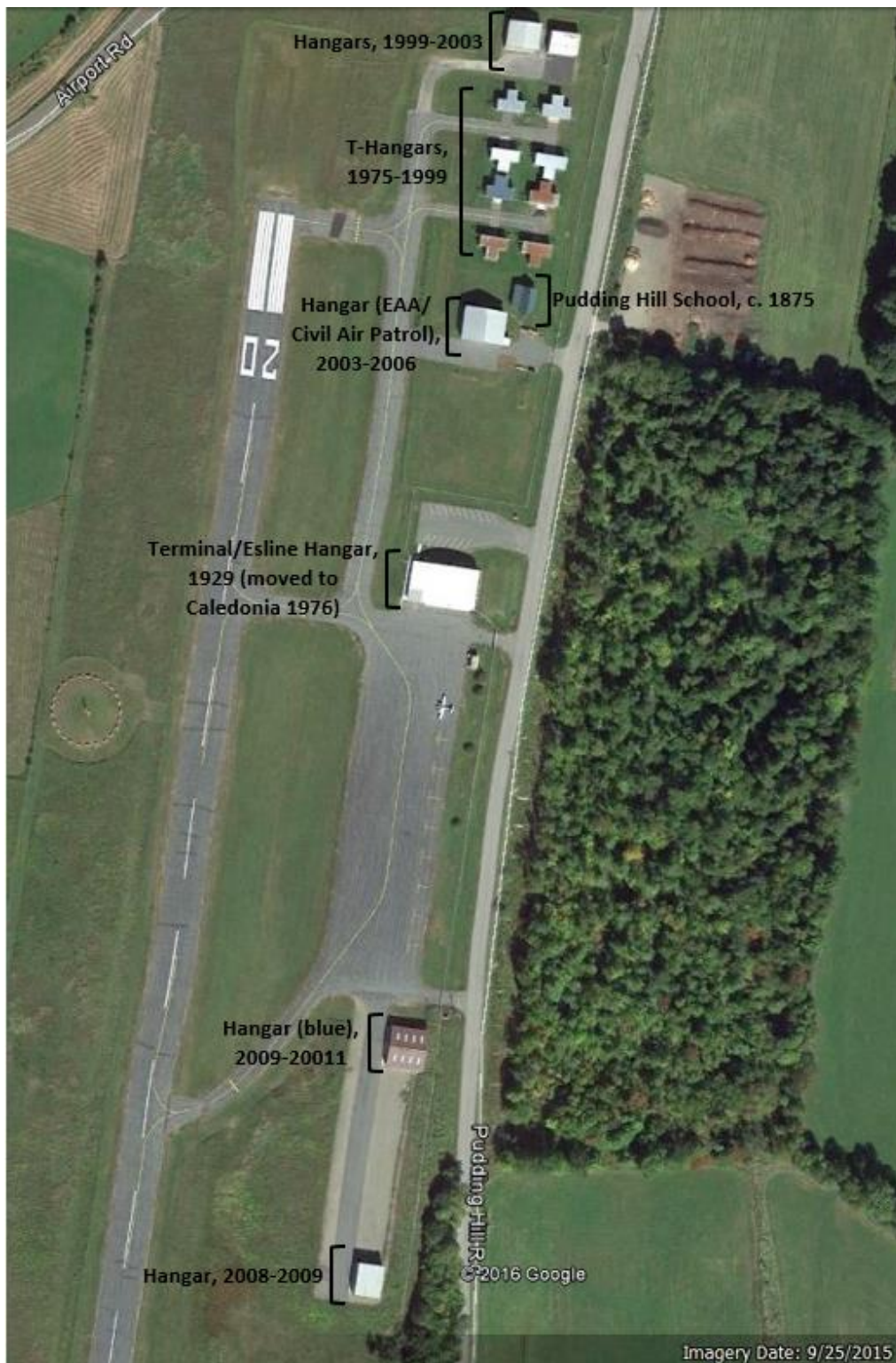


Figure 9. Image of the Caledonia County State Airport with buildings identified.



Figure 10. View southeast of buildings at the Caledonia County State Airport.



Figure 11. View northeast of buildings at the Caledonia County State Airport.



Figure 12. View north of buildings at the Caledonia County State Airport.



Figure 13. View southeast of terminal/hangar at the Caledonia County State Airport.



Figure 14. View southeast of the EAA/Civil Air Patrol hangar at the Caledonia County State Airport.



Figure 15. View southeast of the northernmost hangars at the Caledonia County State Airport.



Figure 16. View southeast of the southernmost hangar at the Caledonia County State Airport.



Figure 17. View northeast of hangar (“blue”) near southern end of the Caledonia County State Airport.



Figure 18. View northeast of T- hangers at the Caledonia County State Airport.



Figure 19. View northeast of front sides of T- hangers at the Caledonia County State Airport.



Figure 20. View northeast of front sides of T- hangers at the Caledonia County State Airport.



Figure 21. View northeast of rear sides of T- hangar at the Caledonia County State Airport.

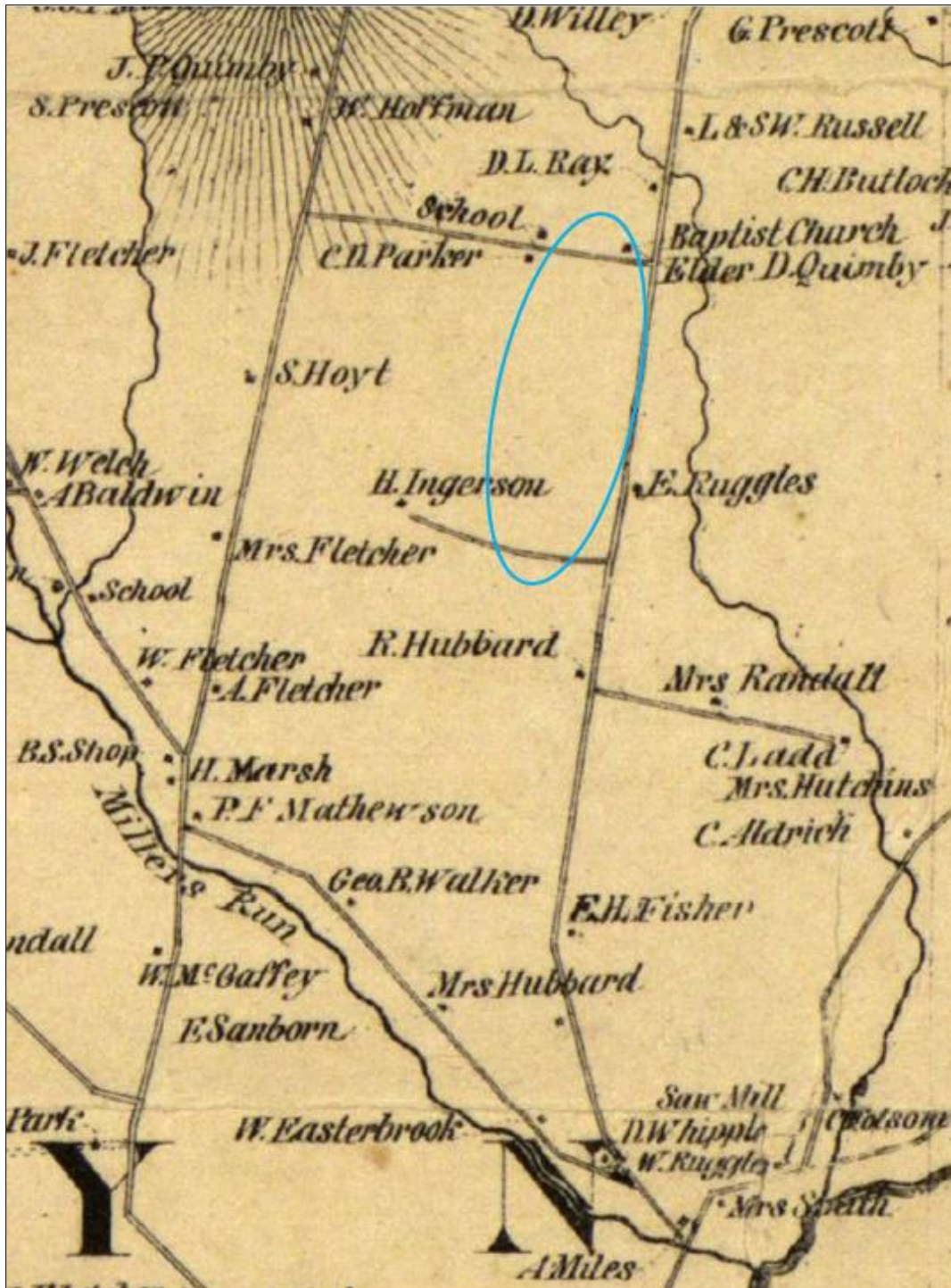


Figure 22. Detail of H.F. Walling's Map of Caledonia County, Vermont (1858), with the approximate location of the Caledonia County State Airport added.



Figure 23. Detail of the map of Lyndon from F.W. Beers' *County Atlas of Caledonia, Vermont* (1875), with the approximate location of the Caledonia County State Airport added.



Figure 24. Detail of an aerial photograph, with the Pudding Hill School location indicated, showing the area of the Caledonia County State Airport in 1962 prior to its construction, (Geotechnics & Resources Inc., 1962a).



Figure 25. Detail of an aerial photograph, with the Pudding Hill School location indicated, showing the area of the Caledonia County State Airport in 1975 (AreoGraphics Corp., 1975); note relocation of road and school (see Figure 24).



Figure 26. View northwest of the Pudding Hill School at the Caledonia County State Airport.



Figure 27. View southwest of the Pudding Hill School at the Caledonia County State Airport.



Figure 28. View southwest of the Pudding Hill School at the Caledonia County State Airport.



Figure 29. View southeast of the Pudding Hill School at the Caledonia County State Airport.



Figure 30. View north of the Pudding Hill School at the Caledonia County State Airport.



Figure 31. View of windows along the east elevation of the Pudding Hill School at the Caledonia County State Airport.



Figure 32. View north into the Pudding Hill School from the main entry door; entryway in foreground.

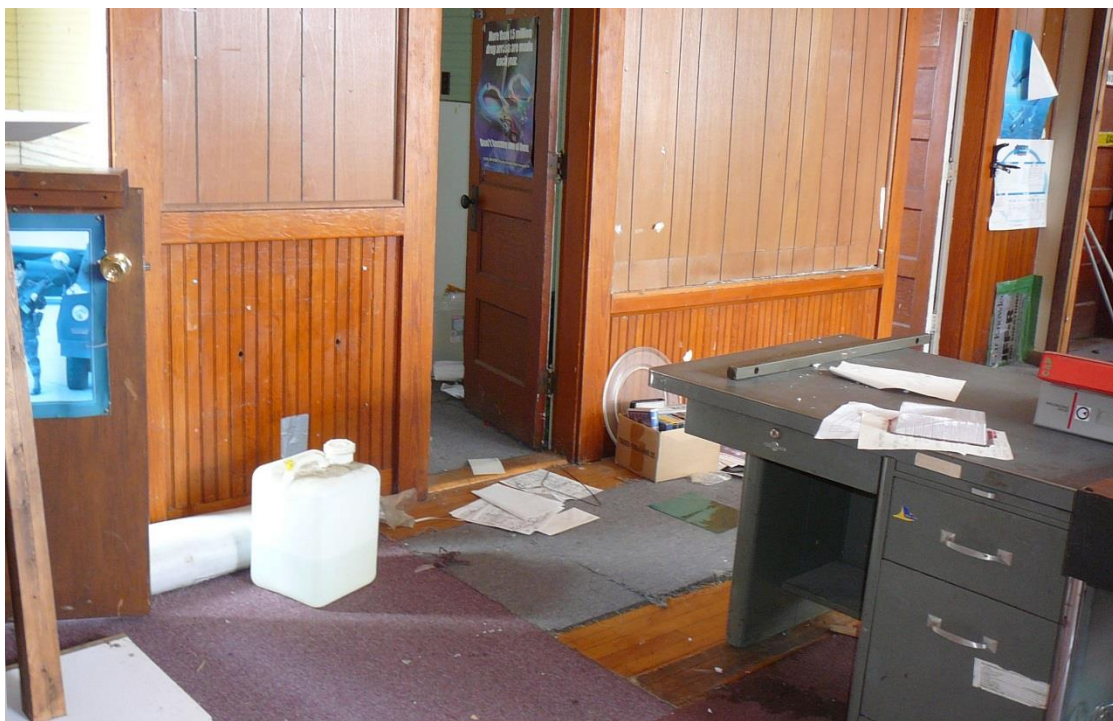


Figure 33. View toward the west wall of the main room in the Pudding Hill School.



Figure 34. View toward the southeast corner of the main room in the Pudding Hill School; main entry door at right.

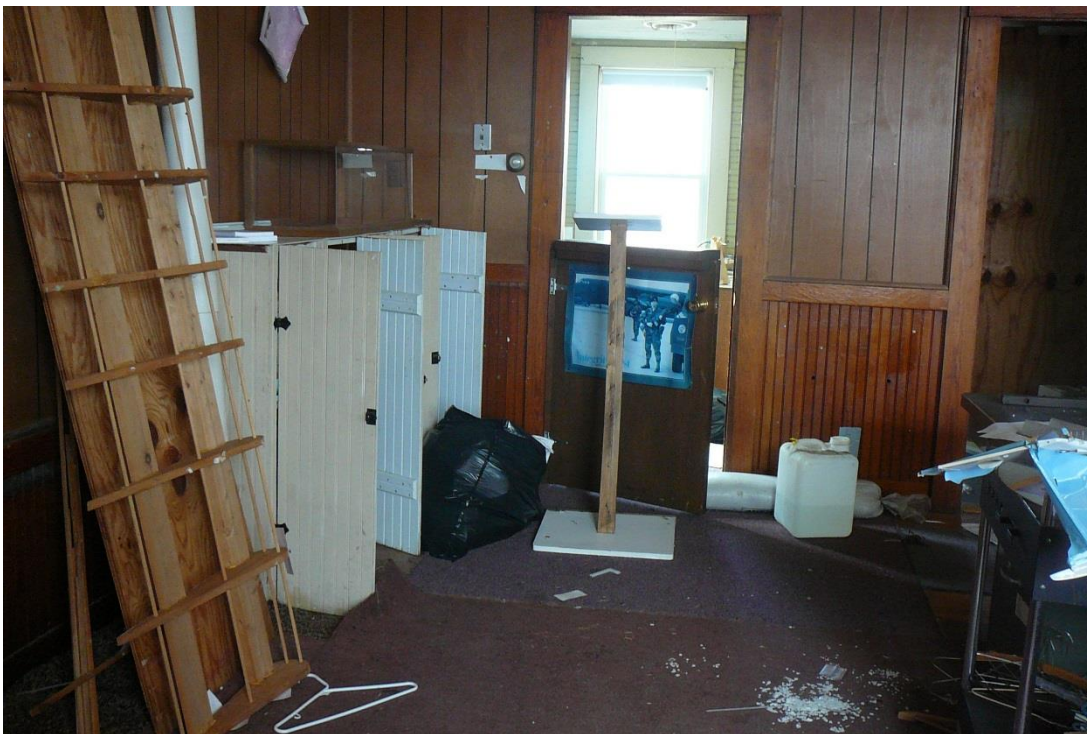


Figure 35. View toward the southwest corner of the main room in the Pudding Hill School.



Figure 36. View toward the north wall of the main room in the Pudding Hill School, from the enclosed entryway.



Figure 37. View north of bank of windows along east wall of the main room in the Pudding Hill School.



Figure 38. Built-in cabinets in small room in addition at the Pudding Hill School.



Figure 39. Small room in addition at the Pudding Hill School; note built-in cabinets and bead board wall covering.



Figure 40. Small room in addition at the Pudding Hill School; note bead board wall and ceiling covering.



Figure 41. Exposed split plaster and lath wall at the Pudding Hill School.



Figure 42. Exposed wood sheathing along the west wall of the main block of the Pudding Hill School, visible from within the addition; the wall may be a former exterior wall with a window opening, in place prior to the construction of the addition.

Terminal Building/Esline Hangar

This building is a 1929 “Standard Esline All-Steel Hangar” fabricated by the Esline Steel Building Company of Detroit, Michigan & Oconomowoc, Wisconsin¹ (*Burlington Free Press* February 2, 1929; *Marshfield News-Herald* November 24, 1928). Similar structures, also made by this company, were once located at other early Vermont airports including (but not limited to) one built in the summer of 1928 at the “Canadian Gateway Airport,” which operated from ca. 1928 to 1933 in Derby on a farm four miles east of Newport (*Burlington Free Press* January 23, 1928; July 25, 1928; Stone 1929:729, 734); at the “Missisquoi Airport” at Swanton (this one was supposed to be copper alloy, not steel) (*Burlington Free Press* April 4, 1930), and at the “Capitol Airport” in Berlin (near Montpelier) (*Burlington Free Press* June 17, 1929).

In the late 1920s, the Vermont Airways Corporation of Newport, Vermont,² was a sales agent for both Waco Airplanes and Esline Steel Hangars (Figure 43) (*Burlington Free Press* August 22, 1928). It was through this company that the City of Burlington purchased this structure in 1929 for \$6,538³ for their airfield (*Burlington Free Press* February 2, 1929). The concrete foundation was laid under the supervision of George C. Stanley (Burlington City’s Engineer) and the structure was assembled by the James E. Cashman Company at the Burlington Municipal Airport (now the Burlington International Airport) in April-May of 1929 in the area just east of the Eldridge School in South Burlington (Figure 44) (*Burlington Free Press* February 2, 1929; April 25, 1929; May 1, 1929). George Stanley described the building as “a typical steel framework structure with corrugated steel sides and roof; the inside dimensions are 80 feet by 60 feet; doors open the entire front of the building” (*Burlington Free Press* May 10, 1935). This hangar could accommodate up to “six planes equipped ready for flying or 10 planes in storage” tipped with their tails up (*Burlington Free Press* May 1, 1929).

In 1944, the City of Burlington contracted with George Russell of South Burlington to move this hangar (“Hangar No. 1”) about 200 ft southwards and put it onto a 3 ft taller concrete foundation to gain more headroom inside the structure (Board of Airport Commissioners, City of Burlington, Vermont, 1982; *Burlington Free Press* September 19, 1944; September 30, 1944). In 1950, the roof was damaged by high winds requiring between \$1,000 and \$1,500 in repairs (*Burlington Free Press* November 27, 1950). In 1975/1976, this hangar was donated to the airport at Lyndon and “the pilot’s association helped truck the dismantled girders across the state” (*Burlington Free Press* February 15, 1976). It was reassembled at the Caledonia County State Airport early in 1976 (Figure 45). This building has been modified from its original design including the installation of a modern bi-fold door where there once had been pressed metal sliding doors, the replacement of corrugated steel walls with concrete block, the elimination of window openings, and the addition of the terminal / office to the west side of the hangar; the interior metal framework of the hangar and exterior metal supports on the east elevation appear intact (Figures 43 – 51).

¹ In November of 1928, it was reported that the Esline Co., “will establish a steel hangar factory [at Oconomowoc] at a cost of approximately \$40,000” (*Marshfield News-Herald* November 24, 1928). Oconomowoc is located west of Milwaukee.

² This company was incorporated ca. 1928 to provide passenger transportation, aerial photography and mapping services, flight instruction & etc) (*Burlington Free Press* January 23, 1928; Stone 1929:727).

³ Also part of the deal was that: “the company has agreed to include a service door in the side of the hangar, not provided in the original specifications” (*Burlington Free Press* February 2, 1929).

If HANGARS *were* AEROPLANES



ESLINE ADVANTAGES

1. Low Maintenance Cost.
2. Scientifically Designed.
3. Attractive Appearance.
4. Fire and Lightning Proof.
5. Easily Operated — One Man Doors.
6. Simple to Erect.
7. Practical Utility—Can Be Enlarged, Remodeled or Moved.
8. 100% Salvage Value.
9. Insulated Against Heat and Cold.
10. Costs Less—Lasts Longer.
11. Reasonably Priced—Easy Terms.
12. Responsible Manufacturer.

YOU select your aeroplane with utmost care—for its dependability, even in severe weather—for its substantial construction and durability—for economical maintenance—speed—attractiveness—low first cost—for its resistance against storms—and practical utility.

Then, why not select your HANGAR—the home of this valuable vehicle—with the same amount of care and with the assurance that you will receive a building which will answer your purpose for a long time to come?

Please note that features of an ESLINE HANGAR meet every discriminating requirement that you would expect to have in your aeroplane.

You leave nothing to guess-work when you buy an ESLINE.

ESLINE DEALERS

Angola Airport, Inc., Angola, New York; Carsons Air Service, Philadelphia, Pennsylvania; Esline Steel Building Co., Detroit, Mich.; E. C. Lathrop, Los Angeles, California; La Rue Airways, New York City; New York Mid-West Airways, Milwaukee, Wisconsin; Nicholas-Brosius, Marchess, Missouri; A. B. Parks Co., Marietta, Ohio; Virginia Airways, Racine, Wisconsin; Harg & Wilson, Chatterbox, New York; Independent Aircraft Sales Co., Newark, New Jersey; W. W. Stone, Long Island, New York; Vermont Airways Corp., Newport, Vermont; Motor Mechanical Co., Grand Forks, North Dakota.

See one of these Dealers Today or write for our descriptive literature.

*Attractive Dealers Proposition Open to
You for First Hangar in Your Territory*

ESLINE COMPANY

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Please send literature and information on Hangar size.....

Name.....

Address.....

THANK YOU for mentioning AVIATION

Use
this
Convenient
Coupon!

Figure 43. Advertisement for the Esline Company from the April 6, 1929, edition of the magazine *Aviation*.



Figure 44. The Caledonia County State Airport's Esline hangar at the Burlington Municipal Airport in 1934 (Louis L. McAllister Photograph Collection, "A" Collection, Burlington Airport 1934-1935, Special Collections, University of Vermont, Burlington, Vermont).



Figure 45. The old Burlington Esline hangar being rebuilt at the Caledonia County State Airport in Lyndon in 1976 (*Burlington Free Press* February 15, 1976, photo credit Jan Herman).



Figure 46. View north of terminal/Esline hangar at the Caledonia County State Airport.



Figure 47. View northwest of terminal/Esline hangar at the Caledonia County State Airport.



Figure 48. View northeast of terminal/Esline hangar at the Caledonia County State Airport.



Figure 49. View southeast of terminal/Esline hangar at the Caledonia County State Airport.



Figure 50. View of interior metal frame in terminal/Esline hangar at the Caledonia County State Airport.



Figure 51. View of interior metal roof trusses in terminal/Esline hangar at the Caledonia County State Airport.

Nearby Historic Resources

There are several residential/agricultural properties located near the Caledonia County State Airport which, based on historic maps, had the potential to be historic, so were reviewed for possible indirect effects from the fence installation project (Figure 52; see Figures 22 and 23). Brief histories and descriptions are given for each property.

D.L. Ray / W. Estarbrook/ Easterbrooks

This farm complex is located north of the airport, on the west side of Pudding Hill Road, at the road's intersection with Airport Road (Figures 53 – 55). The 'D.L. Ray' on the Walling map (1858) probably refers to Daniel L. Ray (1816-1887), who was a native of Danville, Vermont (Gravestone, Ascutney Cemetery, Windsor; Vermont; Vermont Secretary of State, Vermont Vital Records 1720-1908). He appears to have arrived in Lyndon between 1850 and 1860 and left for Windsor, Vermont, between 1860 and 1870 (U.S. Census 1850, 1860, 1870). Daniel Ray later operated the Buena Vista Farm in Windsor (Child 1884:554). It is not known at this time whether D.L. Ray bought the property in Lyndon with a house on it or not.

The "W. Estarbrook" [sic] on the Beers map (1875) at this location most likely refers to Willard Easterbrook (1816-1900) (Gravestone, Lyndon Center Cemetery, Lyndon, Vermont). He was born on Pudding Hill in 1816, being one of six children of Luther and Henrietta Easterbrooks (*Caledonian* May 23, 1900; Child 1887:235). In the 1880s, Willard Easterbrook and his son, Luther S. Easterbrook (aka. Sheridan L.), lived together on the farm (with a total 208 acres and 1,500 maple trees between the two) (Child 1887:69, 235; U.S. Census 1880).

According to *Century Farms of Vermont*: "the Easterbrooks Family Farm is located on Pudding Hill in Lyndon. It came into the possession of L.S. Esterbrooks in 1860, passed to D.E. Esterbrooks, then to L.S. and G.R. Esterbrooks and thence to the present [1985] owner, Robert Esterbrooks" (Leonard 1986:58). "The farm has 132 acres the large hay barn was built before 1860. The house is 124 years old" (as of 1985 when it became a Century Farm, suggesting that it was built ca. 1861) (Leonard 1986:58).

This farm complex consists of a 1 ½-story house with a single story wing attached to its north elevation, several barns and additional outbuildings, with surrounding agricultural fields. The house appears to be a Greek Revival style Classic Cottage with slightly later Gothic Revival style alterations. It likely dates to ca. 1855. There are several different types of barns at the complex; they appear to date from the mid-1800s through the early 1900s. The property operates as an active farmstead.

S.W. Proctor

A second farm complex is located north of the Ray / Easterbrooks complex; the house is located on the west side of Pudding Hill Road, and the barns are situated on the east side of the road (Figures 56 – 58). Mid-19th century historic maps suggest that this farmstead was established between 1858 and 1875 (see Figures 22 and 23). This property appears to have been owned through most of the latter 1800s by Sumner W. Proctor (1826-1903) (Gravestone, Lyndon Center Cemetery, Lyndon, Vermont). Although a native of St. Johnsbury, Sumner Proctor spent years working in Massachusetts, as a hotel porter / steward in the 1850s and 1860s (U.S. Census

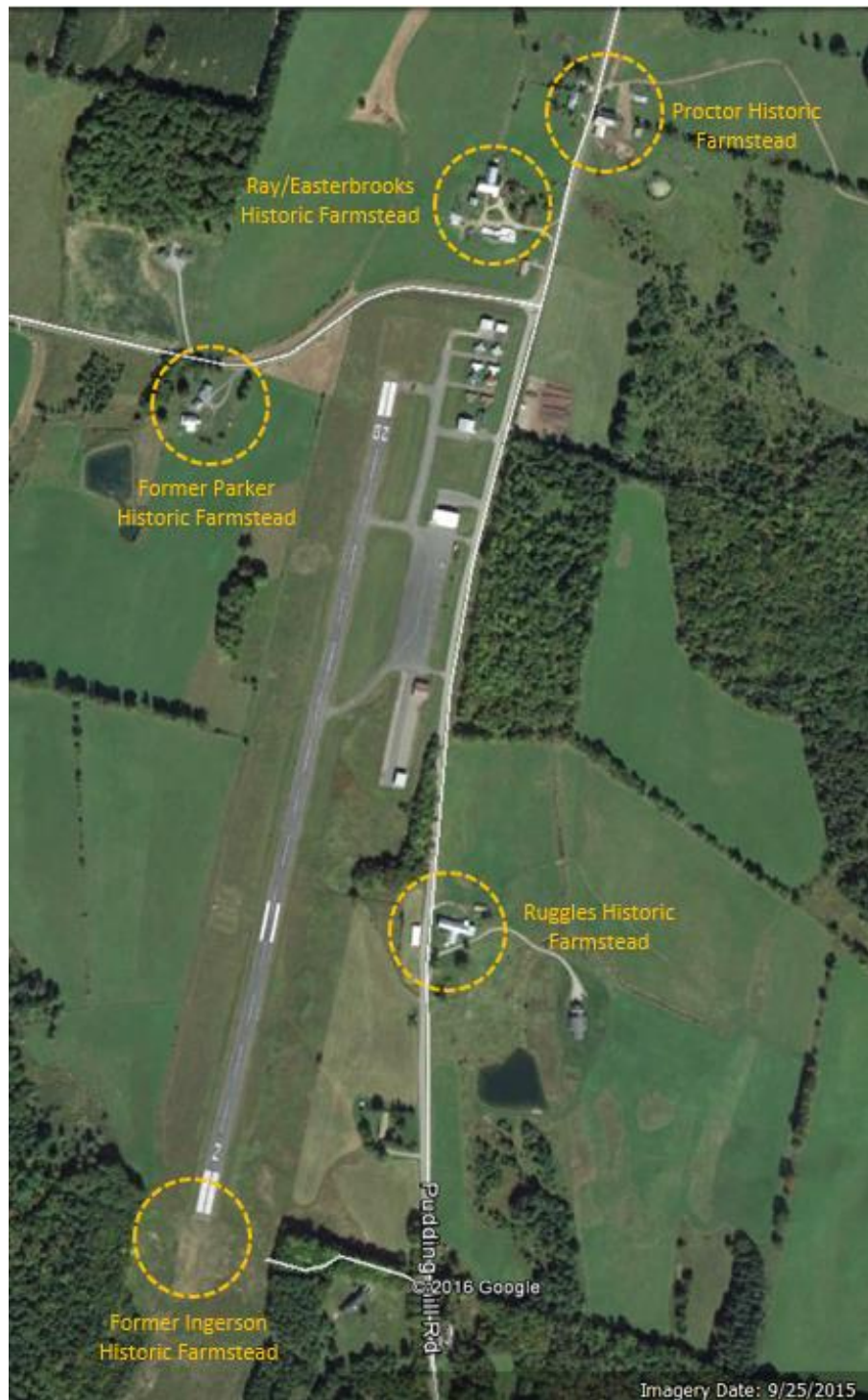


Figure 52. Image showing the location of historic and former historic properties located nearby the Caledonia County State Airport.



Figure 53. View north of the Ray/Easterbrooks farm complex from within the Caledonia County State Airport.



Figure 54. View northwest of the house at the Ray/Easterbrooks farm complex from Pudding Hill Road.



Figure 55. View southwest of the Ray/Easterbrooks farm complex from Pudding Hill Road.

1860). However, in the 1870 federal census he was listed as a 44 year-old farmer living in Lyndon along with his wife, his adopted son, and a servant (U.S. Census 1870). The 1870 census also indicated that the owned \$4,000 in real estate and \$1,000 in personal estate (U.S. Census 1870). However, Sumner Proctor was not a full time occupant of this farm and may have employed a manager or rented the farm out at times. For example, the *Caledonian* reported on November 25, 1886 that, “Sumner Proctor and wife have returned from Mass., where they have been several years and have gone back to their farm” (*Caledonian* November 25, 1886). By 1900, Proctor may have lived in Lyndonville (U.S. Census 1900).

This farm complex consists of a 1 ½-story Classic Cottage form house with a single story wing attached to its south elevation and a separate, two car garage on the west side of the road, and a series of attached barns and additional outbuildings, on the west side of the road. Associated agricultural fields are located on both sides of the road. The house displays vernacular Italianate style decorative detailing in its peaked door and window lintels. It likely dates to the 1860s or 1870s. The large gable roof main barn at the complex; appears to date to the late 1800s; attached barns are likely later in date, probably dating to the mid to late-1900s. The property continues to operate as an active farmstead.



Figure 56. View north of the Proctor farm complex along Pudding Hill Road.



Figure 57. View northwest of the house at the Proctor farm complex on the west side of Pudding Hill Road.



Figure 58. View northeast of the barn complex at the Proctor farm complex on the east side of Pudding Hill Road.

E. Ruggles / E. Ruggles

This group of farm buildings is located south of the airport, on the east and west sides of Pudding Hill Road. The complex no longer has its associated historic house. This property was the Ruggles family farm. Town histories suggest that the property was settled by William Ruggles (1764-1847), a native of Waltham, Massachusetts, and his wife, Rebekah (Hubbard) Ruggles (1780-1850) ca. 1794-1799 (Child 1887:235; Gravestones, Lyndon Center Cemetery, Lyndon, Vermont; U.S. Census 1800). On both the Walling (1858) and Beers (1875) maps, the owner of the property is their son, Ephriam Hubbard Ruggles (1815-1903) (see Figures 22 and 23) (Gravestone, Lyndon Center Cemetery, Lyndon, Vermont). In 1870, Ephriam Ruggles was listed with \$7,500 in real estate and \$5,500 in personal property (U.S. Census 1870). Later, this farm was owned by his son, Charles E. Ruggles. The 1887 Child's Gazetteer listed Charles Ruggles with a farm of 255 acres and 1,500 sugar trees (Child 1887:80). Aerial photographs suggest that the house associated with these farm buildings was located to the south and was removed or destroyed between 1962 and 1974 (see Figures 24 and 25). A modern house has been constructed at the site, southeast of the barns.

The primary barn at the farmstead consists of a long, rectangular gable roof structure with a gambrel roof barn attached to its south elevation (Figure 59). A small gable roof building (possible milk house), projects from the south wall of the gambrel roof barn. The buildings have clapboard siding and metal roofs. The rectangular barn rests on a dry laid stone foundation and, although not fully observed, the other two structures appear to have concrete /concrete block (probably a replacement) foundations. They appear to date from the mid-1800s to the turn of the 20th century. Additional outbuildings are located north and east of the barn, and a multi-bay garage/shed (perhaps mid-1900s) lies across Pudding Hill Road from the barns. Agricultural fields surround the barn complex.



Figure 59. View northeast of the main barn complex at the Ruggles farm complex on the east side of Pudding Hill Road.

Parker

Buildings now standing on the early Parker Family Farm, located immediately west of the airport property on the south side of Airport Road, have been heavily modified and/or have replaced historic buildings (Figure 60). This property was settled by Caleb and Sarah/Sally (Watkins) Parker ca. 1790 (Child 1887:235; Vermont Secretary of State, Vermont Vital Records 1720-1908). The farm was later owned by their son, Caleb D. Parker (ca. 1814-1899) and then by his son, Theodore W. Parker (ca. 1844-1912) (Child 1887:78, 234; Vermont Secretary of State, Vermont Vital Records 1720-1908).

Additional Properties

Hezekiah Ingerson appears on both the Beers and Walling map in the area near the southern end of the present runway. The property was probably associated with Old Place Road. In the 1880s, Ingerson was identified as a livestock breeder who owned 190 acres in Lyndon (Child 1887:74). The buildings associated with this farmstead are no longer standing; a modern house has been constructed along the south side of Old Place Road.

Finally, the Elder Daniel Quimby's (1773-1850) Baptist Church was removed or destroyed between 1858 and 1875 (see Figures 22 and 23). This church was reportedly built ca. 1816 (of just a few years later) by Daniel Quimby "mostly at his own expense" (Burgess and Ward 1889:667-668; Carter 1906:799; Hemenway 1867:346). This was the site of a spirited revival ca. 1823-1824 (generating some 80 converts) (Burgess and Ward 1889:667-668). It closed its doors prior to ca. 1857 (Burgess and Ward 1889:669). Hemenway indicates that the congregation left for Lyndon Center (for a better location and building / one recently "vacated by the Methodists") ca. 1840 (Hemenway 1867:346). The church was located at the approximate place where the relocated Pudding Hill School now sits, within the boundaries of the airport.



Figure 60. View southwest of the former historic Parker farm complex on the south side of Airport Road.

Recommended Significance and Determination of Effect

Two buildings located within the Caledonia County State Airport, the ca. 1870 Pudding Hill School, and the 1929 Eslin Hangar, had the potential to be significant historic resources. Both structures were relocated to the site: the school from just north of its current location, in 1968; and the hangar, from the Burlington airport, in 1976. Although the school building retains much of its historic character and possesses integrity of design, materials and workmanship, and is important at a community and state level, due to its setting within the airport, surrounded by aviation buildings, the schoolhouse has lost its integrity of location, setting, feeling and association. This review therefore recommends that the Pudding Hill School does not retain the quality of significance to be eligible for inclusion on the National Register of Historic Places.

Relocation of the Eslin hangar from one airport to another has not greatly affected the setting, feeling and association of this structure. However, modifications to the original design of the hangar, including the installation of a modern bi-fold door where there once had been pressed metal sliding doors, the replacement of corrugated steel walls with concrete block, the elimination of window openings, and the addition of the terminal / office to the west side of the hangar, have significantly affected its integrity of design, materials and workmanship. Although this building is considered important at a state level for its contribution to the record of aviation development in Vermont, this review recommends that the Eslin hangar does not retain the quality of significance to be eligible for inclusion on the National Register of Historic Places.

This review recommends that three nearby farm complexes, the Ray/Easterbrooks farm complex (ca. 1855), the Proctor farm complex (ca. 1860/1870), and the Ruggles farm complex

(ca. 1850), retain the qualities of significance to be eligible for inclusion on the National Register of Historic Places. The Ray/Easterbrooks and Proctor farmsteads include their historic houses, barns, outbuildings and surrounding agricultural land, and although the Ruggles farm has lost its historic farmhouse, it preserves an historic barn/outbuilding complex with surrounding agricultural fields. All three properties therefore retain their historic character and possess integrity of location, design, setting, materials, workmanship, feeling and association. This review recommends that they are significant at the local, state and national level under Criterion A, for their association with the broad pattern of agriculture in Vermont, and under Criterion C for their distinctive characteristics of building types, period and method of construction.

Based on the recommendation that no buildings within the airport are considered eligible for inclusion on the National Register of Historic Places, this review recommends that the proposed fence installation will have no direct or indirect impact on airport resources. For three nearby farm complexes recommended as National Register eligible, the proposed fence installation project will have No Effect on two of them (Ray/Easterbrooks and Proctor), because there is existing fence already in place along the northern edge of the airport in view of the farmsteads. The third property (Ruggles) will likely be able to view some portion of the new fencing; however, this review recommends that the viewshed impacts will be very minimal and a No Adverse Effect on the property is recommended. There are no standing historic resources near the proposed vegetation clearing along the new fence line at the southern end of the project area, so that component of project work will have No Effect on historic resources.

This Historic Resources Review of the installation of perimeter fencing and associated work at the Caledonia County State Airport located in Lyndonville, Caledonia County, Vermont, recommends that the project will have No Adverse Effect on significant historic resources. No further historic resources review is recommended.

MIDDLEBURY STATE AIRPORT

Project Location and Description

Middlebury State Airport is located in the town of East Middlebury, in Addison County, in the west central part of Vermont (Figure 61). The airport lies to the west of VT Route 116, along Airport Road, northeast of the town center (Figures 62 and 63). As summarized by C&S Engineers, Inc., the proposed project will include (Figures 64 – 66) (C&S: 2017b):

- Removing approximately 2,000 LF of existing chain link fence and gates
- Removing (clearing and grubbing) approximately 4,500 SY of vegetation in upland areas
- Installation of approximately 5,500 LF of green PVC coated chain link fence without barbed wire (8 foot sections) with concrete foundations; approximately 5,250 LF green PVC coated chain link fence without barbed wire (6-foot and 8-foot sections) with concrete foundations; 70 LF ornamental fence with concrete foundations
- Installation of: one 4-foot single swing pedestrian gate; one 4-foot ornamental single swing gate; one 16-foot single cantilever gate; six 24-foot single cantilever gate
- Installation of two mechanical gate operators on two of the single cantilever gates
- Repairing two existing double swing gates
- Trenching (1' width, 24" deep) for installation of approximately 75 LF of 2-inch diameter RGS conduit in pavement; Trenching (1' width, 24" deep) for installation of approximately 1,000 LF of 2-inch diameter PVC conduit in turf
- Installation of approximately 3 electrical pullboxes
- Restoration of project areas

Existing chain link fence is in place along the north and east perimeters of the airport, and along a portion of the west side of the property; all new fencing will tie-in with existing fencing that is not being removed.

Historic Background

The first airport in Middlebury was “located close to Route 7 a little south of Middlebury Village” (just south of the Foote Street/U.S. Route 7 intersection), and operated irregularly in the 1920s, and more regularly from ca. 1930 into the 1940s (*Burlington Free Press* July 21, 1954). However, “with the houses and pastures so close and the multitude of high powered wires and the nearness of traffic, it seemed desirable to seek another location. The one selected is north of East Middlebury, on a back road so hidden that the planes are not visible except to those who purposely go to the field” (*Burlington Free Press* July 21, 1954). This new site was located in an old farm field, “which had nearly overgrown with trees” (*Burlington Free Press* July 21, 1954). The property was leased to Robert Hunt in 1950, and in 1952 contractor Leonard Zeeman cleared and leveled the field “with bulldozers” (initially the field had a 2,300 ft runway), and “the headquarters were moved to the new location” (*Burlington Free Press* April 26, 1952, July 21, 1954). The first plane landed in East Middlebury in November of 1952 (*Burlington Free Press* July 21, 1954). For several years, this airfield was run as a private venture, first by Robert Hunt then by Alphonse Quesnel, owner of Dustair Inc. (a crop dusting company founded ca. 1951). In 1966, the facility was purchased by the Town of Middlebury and in 1970, it was acquired by the State of Vermont. Presently, it consists of 156 acres and has one runway (now extended to 2500 by 50 ft).

Airport Buildings

There are currently 14 buildings located at the Middlebury State Airport (Figures 67 – 71). Based on aerial photographs and Google Earth historic imagery, only a few structures at the airport were built by 1962, with most built after 1974, and several constructed in the 2000s (Figures 72 and 73; see Figure 67). A ca. 1930 corrugated metal T-hangar now on the property was moved from the earlier airport in Middlebury to this facility (VTDHP: n.d.). Its initial location at the current airport was on the east side of the runway, but it was moved to its current location in the late 1960s or early 1970s (see Figures 72 and 73). There was an arched roofed hangar on the site by 1954 (*Burlington Free Press* July 21, 1954). On October 15, 1956, a hangar at Middlebury airport burned with three planes and a significant amount of equipment inside (*Burlington Free Press* October 16, 1956). It is not known if the building that burned was an arched roof hangar, but there are now two arched roof hangars (probably ca. 1950) on the property. The smaller (more southerly) arched roof hangar appears to have been dismantled and rebuilt slightly further west between 1993 and 2006; it may have new siding on it (Google Earth 1993, 2003, 2006). Images of individual buildings at the airport were taken starting at the northernmost hangar, and moving southward (Figures 74 – 85).

Nearby Historic Resources

A comparison of the mid-19th century maps with the 20th century aerial photographs and Google Earth imagery, suggested that there were no extant pre-1960 structures nearby the Middlebury State Airport (Walling 1857; Beers 1871). Review of buildings in close proximity to the airport during the site visit on April 11, 2017 confirmed that no historic buildings remain nearby.

Recommended Significance and Determination of Effect

The majority (10) of the buildings at the Middlebury State Airport are less than 50 years old. The two, ca. 1950 arched roof hangars (one of which may have been modified when it was moved), the ca. 1930 T-hangar, and possibly the second T-hangar, which dates after 1962 and by 1974, are the only structures that had the potential to be significant historic resources. However, review of these latter four buildings, recommends that they do not possess the distinctive characteristics of building type, period and method of construction, or quality of significance, to be considered eligible for inclusion on the National Register of Historic Places, so no buildings within the airport are considered significant historic resources. No historic resources were identified nearby the airport.

This Historic Resources Review of the installation of perimeter fencing and associated work at the Middlebury State Airport located in East Middlebury, Addison County, Vermont, therefore recommends that the project will have No Effect on significant historic resources. No further historic resources review is recommended.

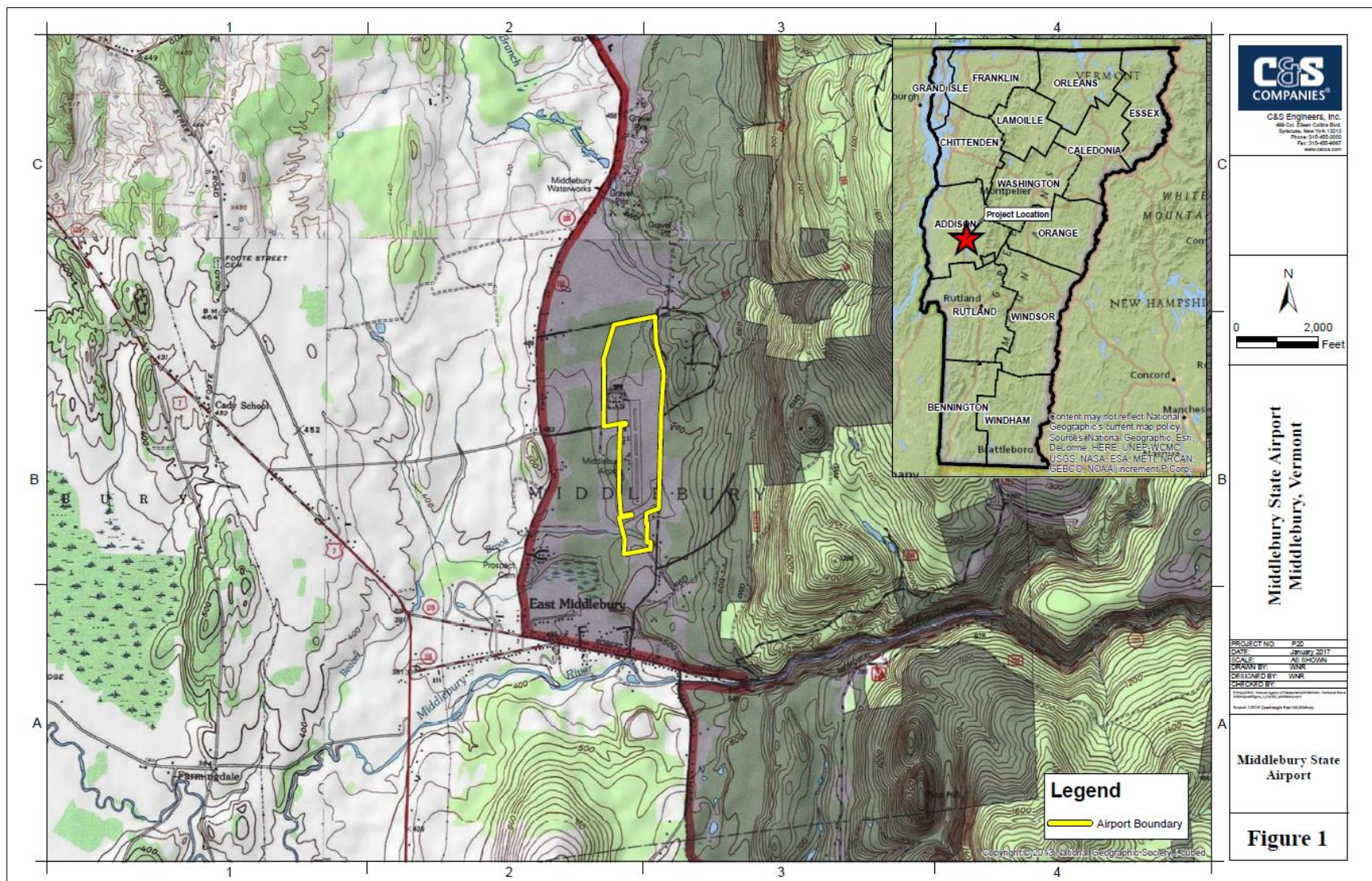




Figure 62. Aerial view of the Middlebury State airport, facing northeast (<http://vtrans.vermont.gov/aviation/airports/middlebury>)



Figure 63. View north of Middlebury State airport along Airport Road.

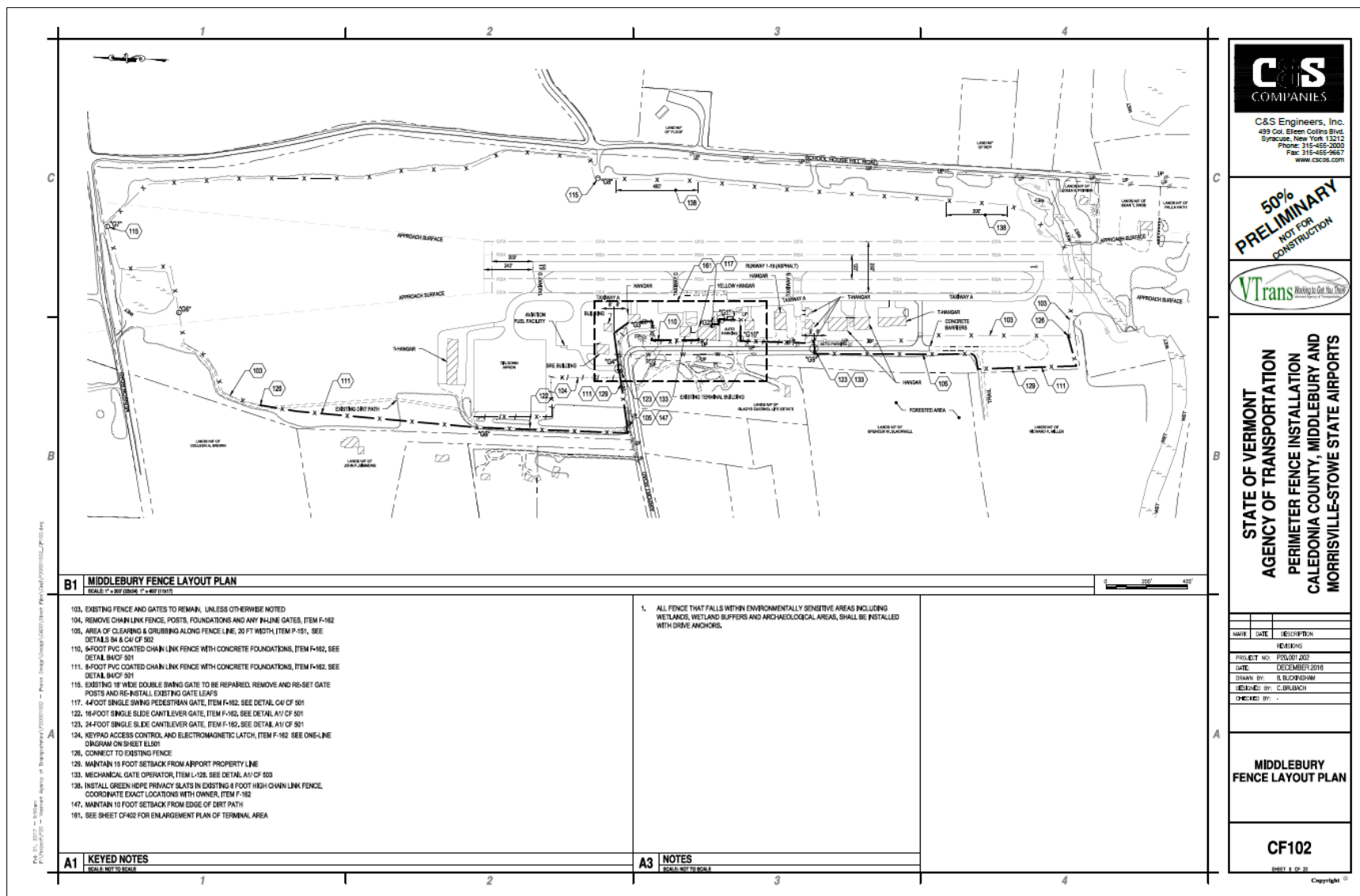


Figure 64. Preliminary fence layout plan for the Middlebury State Airport, Middlebury, Addison County, Vermont (plan provided by VTrans).

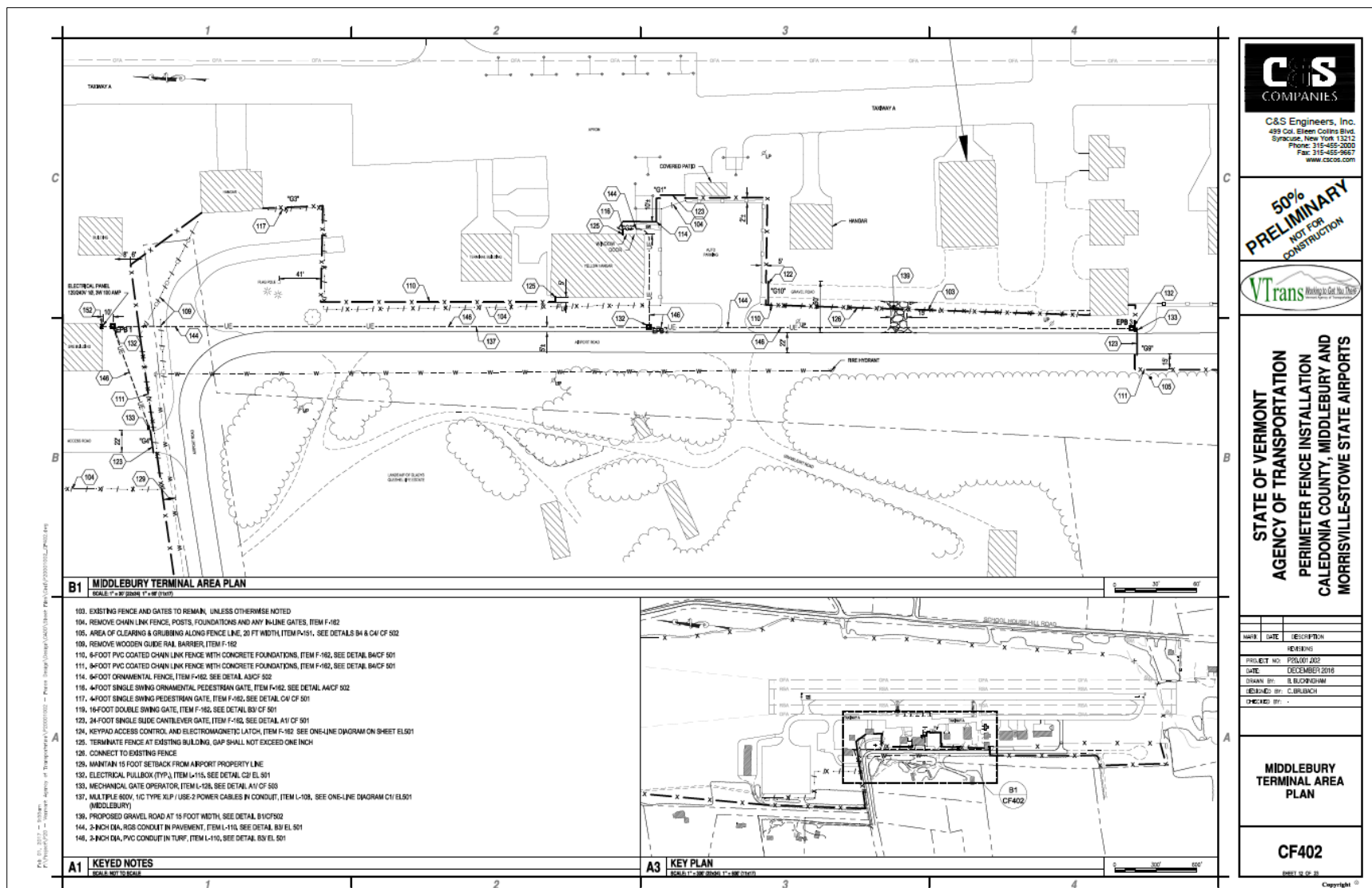


Figure 65. Preliminary terminal area plan for the Middlebury State Airport, Addison County, Caledonia, Vermont (plan provided by VTrans).

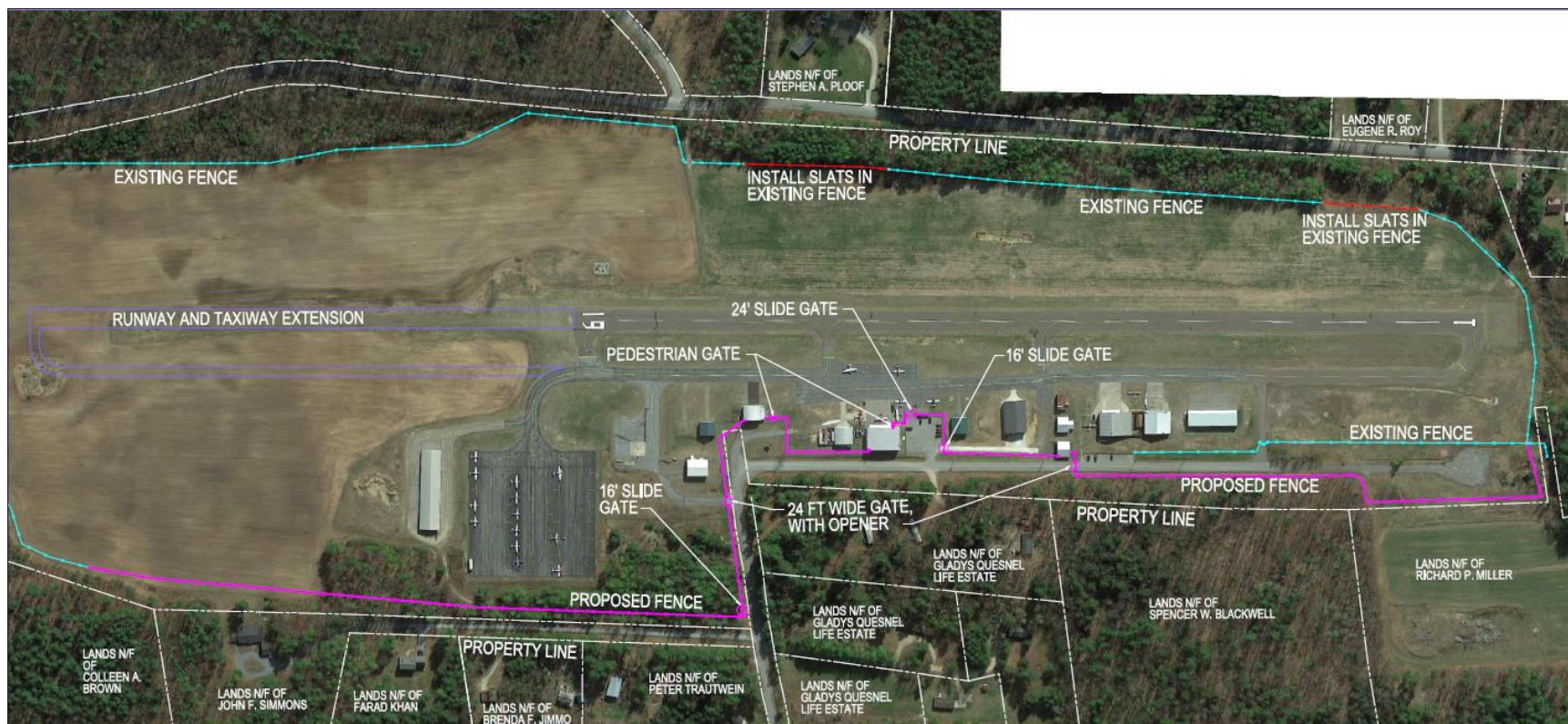


Figure 66. Preliminary fence layout plan for the Middlebury State Airport, Middlebury, Addison County, Vermont (image provided by VTrans).

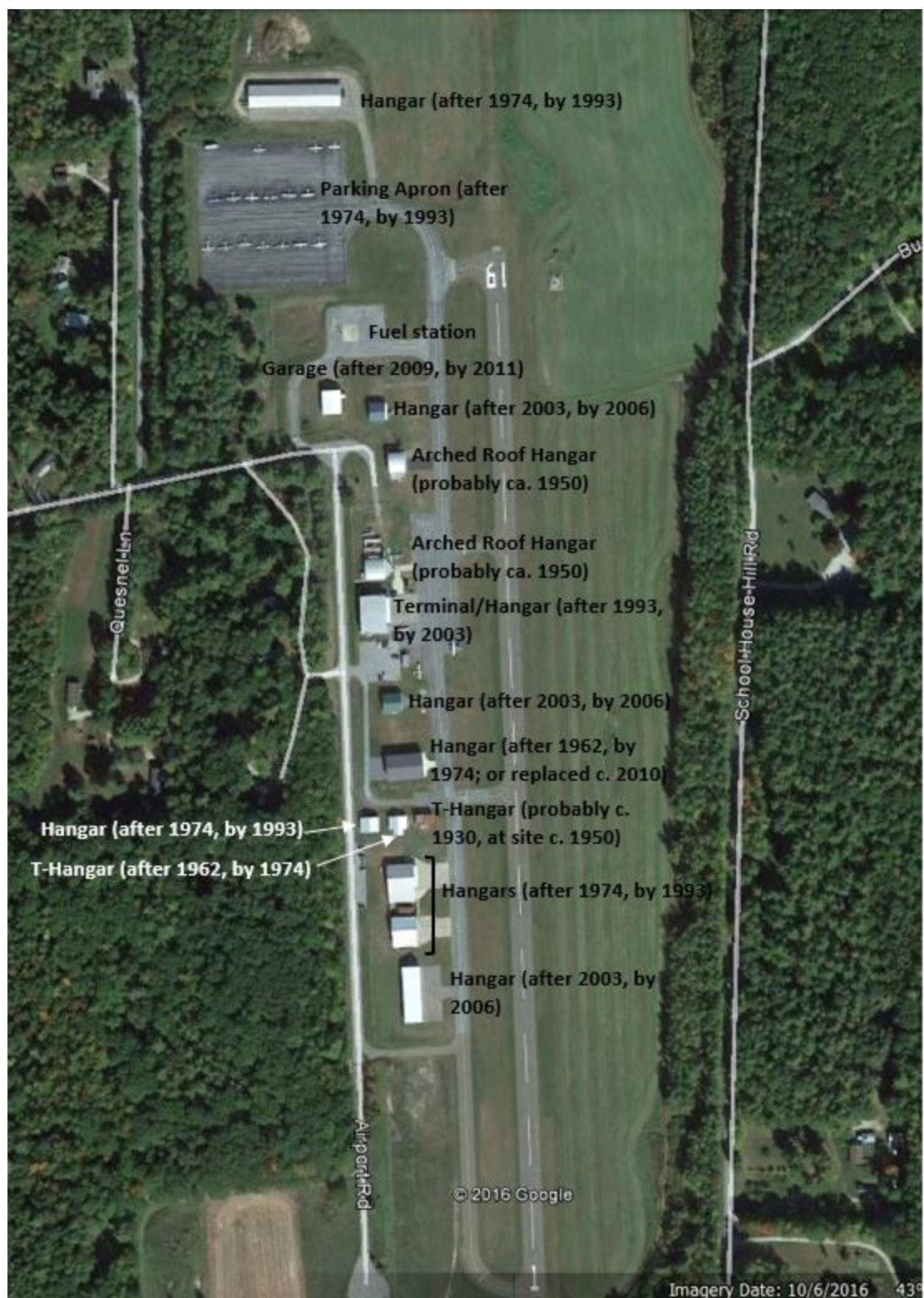


Figure 67. Image of the Middlebury State Airport with buildings identified.



Figure 68. View northwest of buildings at the Middlebury State Airport.



Figure 69. View southwest of buildings at the Middlebury State Airport.



Figure 70. View southwest of buildings at the Middlebury State Airport.



Figure 71. View northwest of buildings at the Middlebury State Airport.



Figure 72. Detail of an aerial photograph taken in 1962, showing the Middlebury State Airport, with airport buildings indicated (Geotechnics & Resources Inc., 1962b).



Figure 73. Detail of an aerial photograph taken in 1974, showing the Middlebury State Airport, with airport buildings indicated (Aerographics Corp., 1974).



Figure 74. View northwest of the northernmost hangar at the Middlebury State Airport.



Figure 75. View southwest of the garage at the Middlebury State Airport.



Figure 76. View southwest of hangar at the Middlebury State Airport.



Figure 77. View southwest of arched roof hangar at the Middlebury State Airport.



Figure 78. View southwest of smaller arched roof hangar at the Middlebury State Airport.



Figure 79. View northwest of terminal/hangar at the Middlebury State Airport.



Figure 80. View southwest of hangar at the Middlebury State Airport.



Figure 81. View northwest of hangar at the Middlebury State Airport.



Figure 82. View southwest of hangars at the Middlebury State Airport; T-hangars at left and center.



Figure 83. View northwest of hangars at the Middlebury State Airport; T-hangars at right and center.



Figure 84. View southwest of hangars at the Middlebury State Airport



Figure 85. View southwest of southernmost hangar at the Middlebury State Airport.

MORRISVILLE-STOWE STATE AIRPORT

Project Location and Description

Morrisville-Stowe State Airport is located in the town of Morrisville, in Lamoille County, in north central Vermont (Figure 86). The airport is situated along the east side of VT Route 100, southwest of the town center (Figures 87 and 88). As summarized by C&S Engineers, Inc., the proposed project will include (Figures 89 – 91) (C&S: 2017c):

- Removing approximately 200 LF of existing chain link fence and gates; removing 4,600 LF of existing pasture/barbed wire fence
- Removing (clearing and grubbing) approximately 250 SY of vegetation in upland areas
- Removing 1,200 SY of trees in wetlands
- Installation of approximately 6,500 LF of green PVC coated chain link fence without barbed wire (6-foot and 8 foot sections) with concrete foundations; approximately 4,500 LF green PVC coated chain link fence without barbed wire (6-foot and 8-foot sections) with drive anchors (resulting in 1,775' of fence installation in wetlands and 2,650' of fence installation in wetland buffer areas)
- Installation of: six 24-foot double swing gates; two 24-foot single cantilever gates; one 16-foot single cantilever gate
- Installation of two mechanical gate operators on two of the single cantilever gates
- Trenching (1' width, 24" deep) for installation of approximately 60 LF of 2-inch diameter RGS conduit in pavement; Trenching (1' width, 24" deep) for installation of approximately 600 LF of 2-inch diameter PVC conduit in turf
- Installation of 3 electrical pullboxes
- Installation of 3 pipe culverts under the proposed fence (resulting in 1,500 sq. ft. of wetland disturbance)
- Restoration of project areas

Existing chain link fence is in place along a portion of the west side of the property; all new fencing will tie-in with existing fencing that is not being removed. Additional project work not detailed in current plans, will include the demolition of two buildings, including the existing terminal, at the airport to make way for the construction of a new terminal/hangar (see Figure 90).

Historic Background

The Morrisville-Stowe State Airport, built 1959-1960, was the first state airport built from scratch by the State of Vermont (*Burlington Free Press* March 28, 1961). It opened as a simple sod/gravel strip, 2,100 ft long, in August of 1960 (*Burlington Free Press* August 12, 1960). The runway and taxiway were paved in 1963 (Figure 92). Presently, the airport consists of 112 acres and has one runway (now extended to 3,701 x 75 ft).

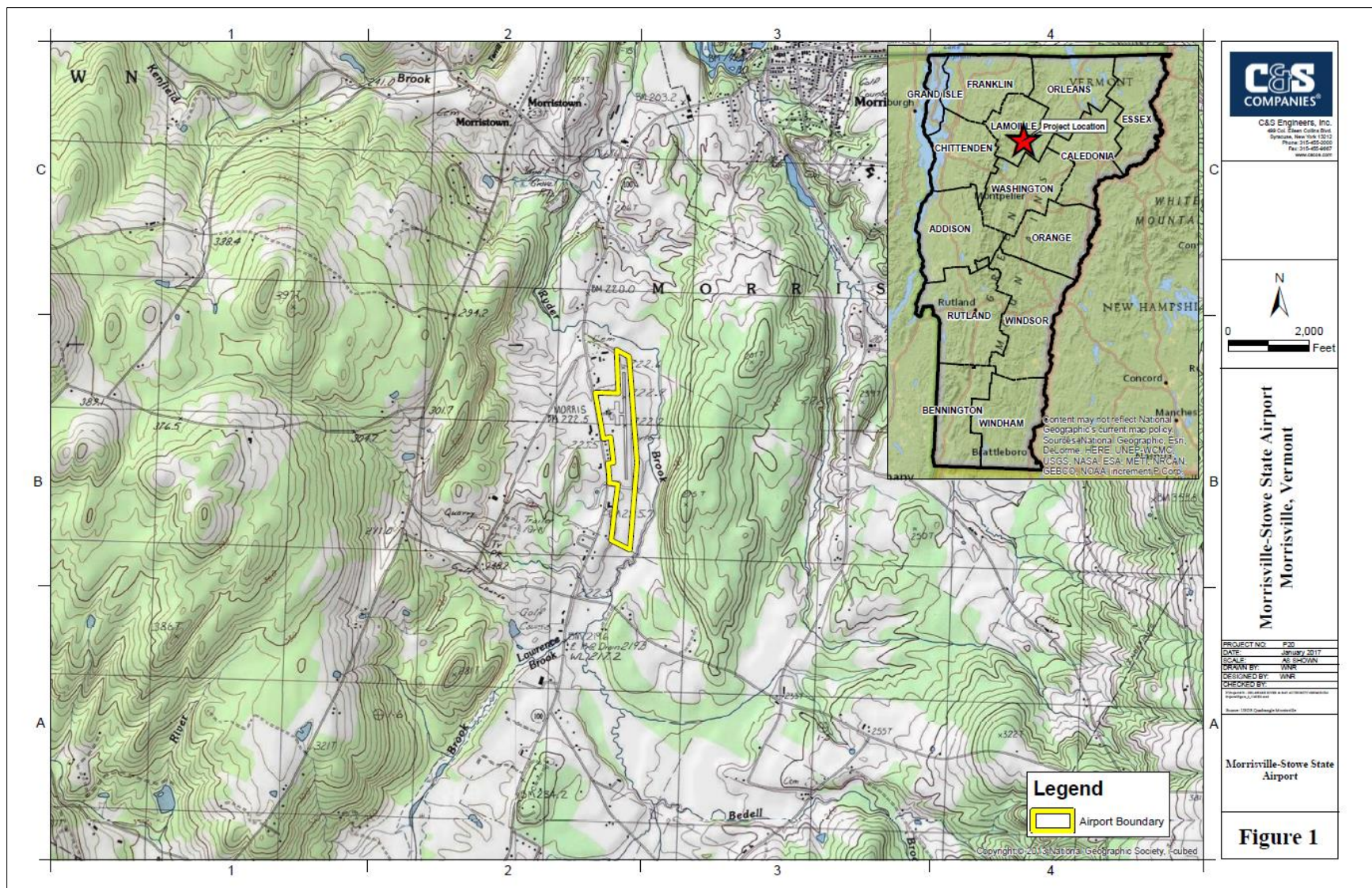


Figure 86. Map showing the location of the Morrisville-Stowe State Airport, Morrisville, Lamoille County, Vermont (map provided by VTrans).



Figure 87. View north of Morrisville-Stowe State Airport along VT Route 100.



Figure 88. View south of Morrisville-Stowe State Airport along VT Route 100.

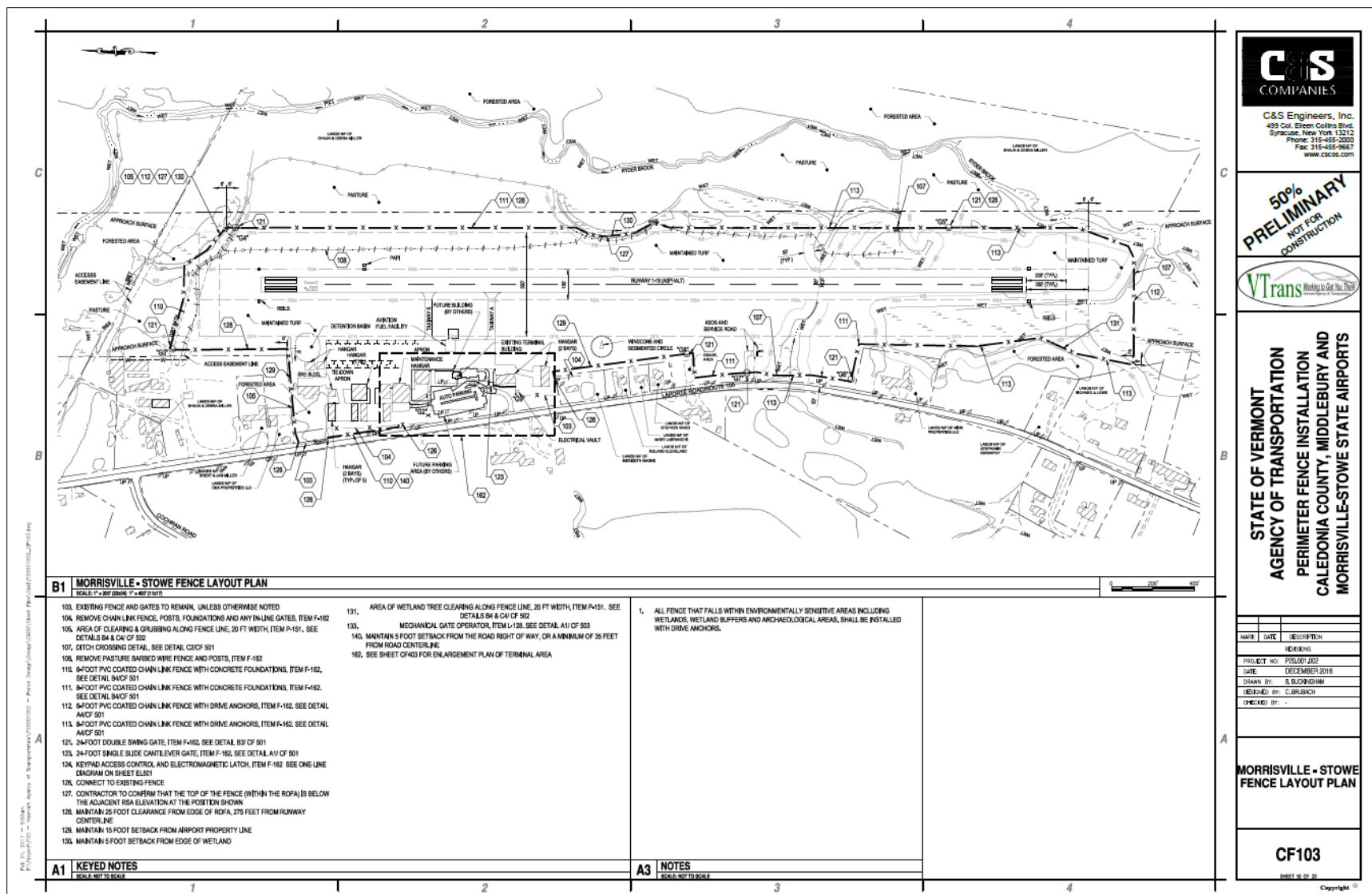


Figure 89. Preliminary fence layout plan for the Morrisville-Stowe State Airport, Morrisville, Lamoille County, Vermont (plan provided by VTrans).

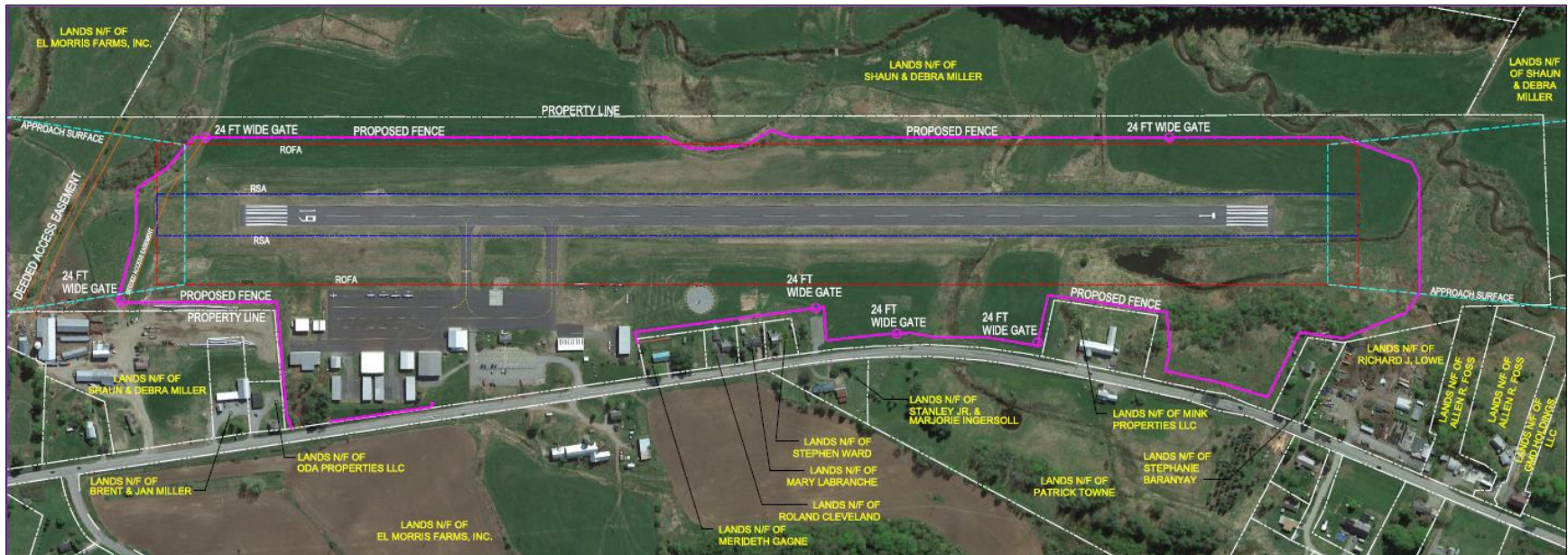


Figure 91. Preliminary fence layout plan for the Morrisville-Stowe State Airport, Morrisville, Lamoille County, Vermont (image provided by VTrans).



Figure 92. Detail of an aerial photograph showing the Morrisville-Stowe State Airport in 1963, during paving operations (Geotechnics & Resources Inc., 1963).

Airport Buildings

All 15 buildings at the Morrisville-Stowe State Airport post-date 1960, when the airport was constructed (Figure 93 – 97). The terminal building was built in 1984, at about the same time that the runway was extended 1,000 ft (*Burlington Free Press* February 6, 1984). Based on Google Earth historic imagery, eight of the hangars were built prior to 1995, four were built after 1995 but before 2003, and two were built after 2003, but before 2006 (Google Earth:1995 – 2015) (see Figure 93). Images of individual buildings at the airport were taken starting at the northernmost hangar, and moving southward (Figures 98 – 105).

Nearby Historic Resources

According to the published 1935 town history, LaPorte Road (VT Route 100) was opened ca. 1832-1833 and the area was, “soon settled by thrifty prosperous farmers” (Mower 1935:43). By the mid-1800s, settlement along the road was well established (Figures 106 and 107). Based on the 19th century maps, several properties identified along VT Route 100 near the airport had the potential to be historic resources, so were reviewed for possible indirect effects from the fence installation project (Figure 108; see Figures 106 and 107). Brief histories and descriptions are given for each property.

The Hill Farm

Located adjacent to the northern end of the airport, on the east side of VT Route 100, this farm may have been established after 1859, but before 1878 (see Figures 106 – 108). It is not clear at this time which “Hill” the Beers map references. The property may have been associated with Amasa B. Hill (1810-1889), his son Harvey J. Hill (1824-1898) and one or two of his sons, specifically, Addison B. Hill (1856-1926) and/or Enos A. Hill (1848-1918). Today, this farm complex consists of numerous barns and outbuildings, most of which appear more modern, and a 2-story, gable roof farmhouse (Figures 109 – 112). The farmhouse may date to the later 1800s; other than a wrap-around porch with Queen Anne style wooden posts, it does not retain historic details. A gable roof barn or shed directly to the east of the house may also date the late 1800s.

A.W. Griswold’s Malvern Farm

This farm complex is located on the west side of VT Route 100, across the road from the airport; it was historically “Malvern Farm” (see Figures 107 and 108). Several farms labeled ‘A.W. Griswold’ or ‘A.W.G.’ on the Beers map were apparently part of (or associated with) the ‘Malvern Stock Farm’ (aka. the ‘New York Farm’), which was created in the 1860s by Almon Whiting Griswold Sr. (1822-1890), a Vermont native who had become a successful corporate lawyer in New York City (Figure 113) (*Burlington Free Press* August 20, 1873; February 13, 1878; December 4, 1948; U.S. Census 1870). In 1870, he was listed in the federal census as a NYC lawyer with \$150,000 in real estate and \$175,000 in personal estate; he was also a noted book collector (especially early Shakespeare). Griswold “specially fitted” the property “up as a stock farm” and built a number of new structures at a reported cost of \$18,000 (Figure 114) (*Burlington Weekly Free Press* October 2, 1902; September 2, 1909; December 4, 1948). This included a three-story 24-room house, which had “hardwood floors throughout” (*Burlington Free Press* December 4, 1948). Under Griswold’s ownership, this farm became one of the more famous livestock farms of its day. As one local newspaper reported in 1873, it “has become one of the best if not the best stock farm in Vermont” (*Burlington Free Press* August 20, 1873). For many years, Griswold also “maintained a race track on the grounds” (*Burlington Free Press* December 11, 1947).



Figure 93. Image of the Morrisville-Stowe State Airport with buildings identified.



Figure 94. View north of northernmost buildings at the Morrisville-Stowe State Airport.



Figure 95. View southwest of buildings at the Morrisville-Stowe State Airport.



Figure 96. View northwest of buildings at the Morrisville-Stowe State Airport.



Figure 97. View southwest of southernmost buildings at the Morrisville-Stowe State Airport.



Figure 98. View northwest of hangars and garage at the northern end of the Morrisville-Stowe State Airport.



Figure 99. View northeast of hangars at the northern end of the Morrisville-Stowe State Airport.



Figure 100. View west of hangar at the Morrisville-Stowe State Airport.



Figure 101. View southwest of hangars at the Morrisville-Stowe State Airport.



Figure 102. View southwest of hangar and terminal at the Morrisville-Stowe State Airport.



Figure 103. View west of terminal at the Morrisville-Stowe State Airport.



Figure 104. View southwest of hangars at the southern end of the Morrisville-Stowe State Airport.



Figure 105. View southwest of southernmost hangar at the Morrisville-Stowe State Airport.



Figure 106. Detail of H.F. Walling's *Map of the Counties of Orleans, Lamoille and Essex, Vermont* (1859), with the approximate location of the Morrisville-Stowe State Airport added.

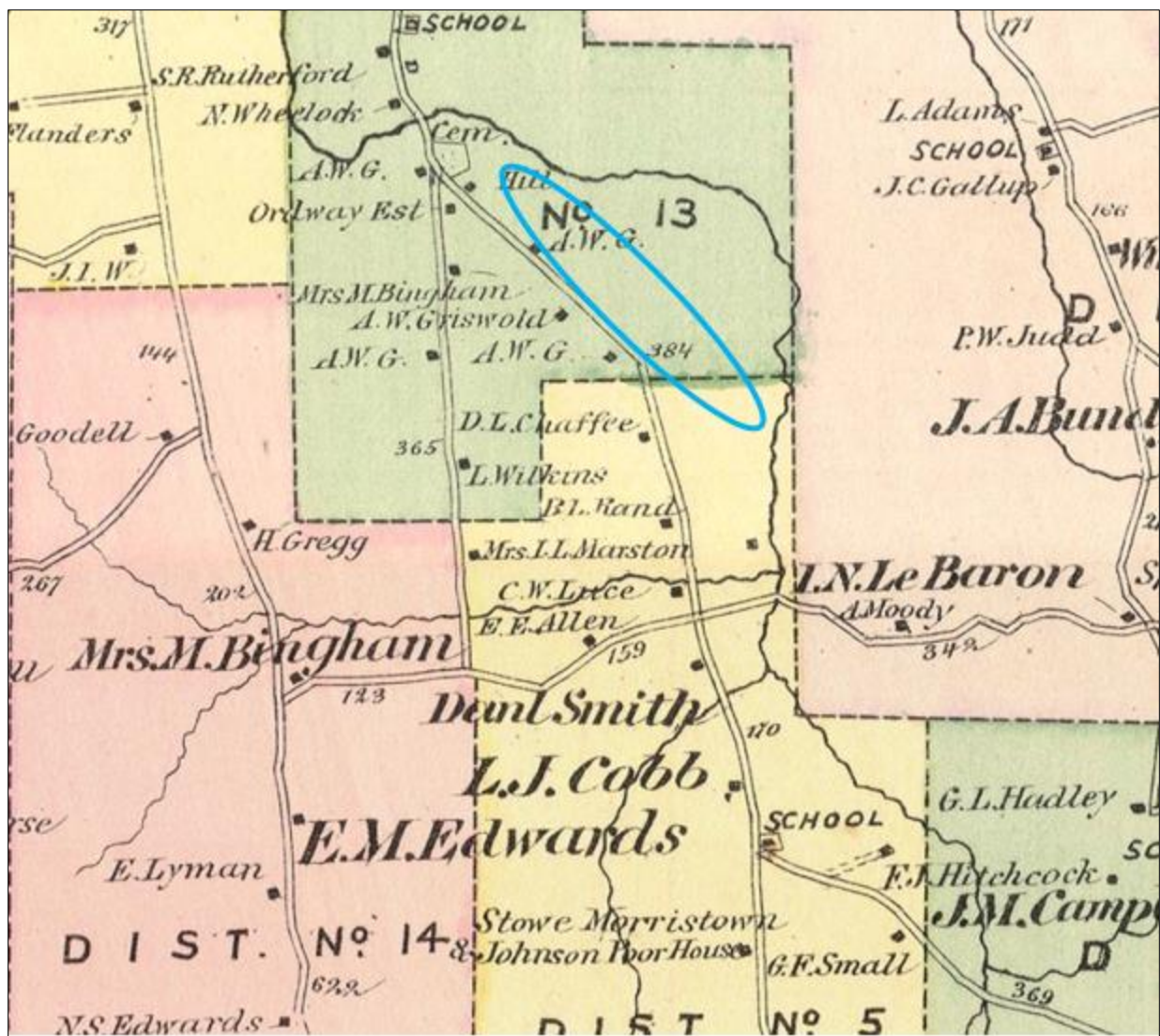


Figure 107. Detail of the map of Morristown in F.W. Beers' *Atlas of the Counties of Lamoille and Orleans, Vermont* (1878), with the approximate location of the Morrisville-Stowe State Airport added.

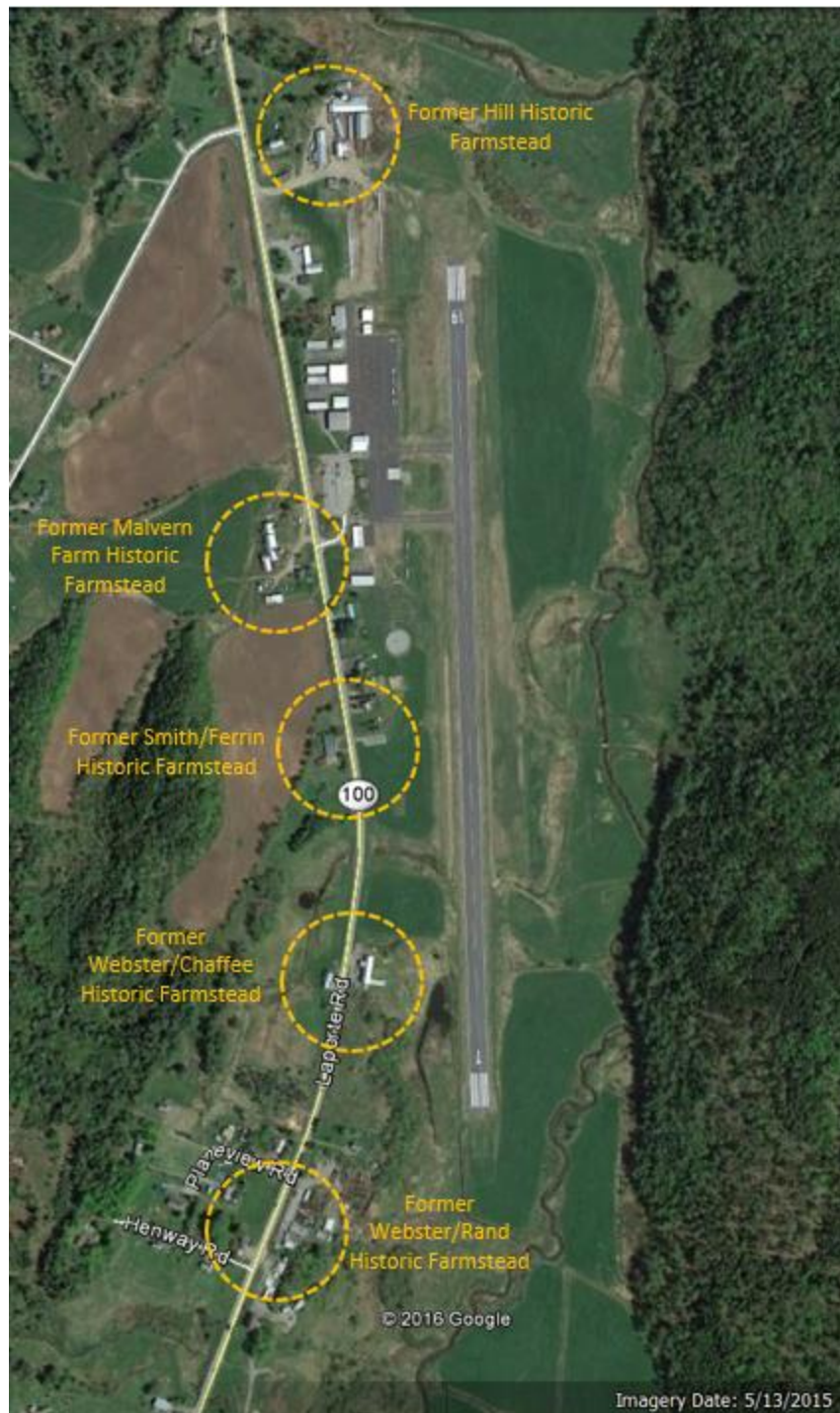


Figure 108. Image showing the location of former historic properties located nearby the Morrisville-Stowe State Airport.



Figure 109. View northeast of the former Hill farmstead on the east side of VT Route 100.



Figure 110. View northeast of the former Hill farmstead on the east side of VT Route 100.



Figure 111. View northeast of the house at the former Hill farmstead on the east side of VT Route 100.



Figure 112. View northeast of barn/shed at the former Hill farmstead on the east side of VT Route 100.



Figure 113. Almon W. Griswold Sr. (posted by Lydia Welch 2014 to Ancestry.com).



Figure 114. The main farm buildings of the “Malvern Stock Farm” on the LaPorte Road in Morristown (*News and Citizen* July 4, 1890); note: all of the barns and outbuildings (right) burned in 1909 and the house burned in 1947.

This farm was later owned by Charles R. Page (1837-1901), formerly of Hyde Park, who was a retail merchant and lumber dealer turned stock breeder (Child 1883:357; *News and Citizen* July 4, 1890; February 27, 1901). “For many years,” Page “made a specialty of raising and dealing in fine horses” (*Burlington Weekly Free Press* October 2, 1902). Page gave up the farm, after the death of his wife in 1894 (*News and Citizen* February 27, 1901). The farm was subsequently owned by Murray Buck (*News and Citizen* May 1, 1901). In 1902, Buck sold it to J. L. Hovey of Wheelock for \$10,000 (*Burlington Weekly Free Press* October 2, 1902). At the time, it was still considered “one of the best known farms in Lamoille County” (*Burlington Weekly Free Press* October 2, 1902).

In 1909, while it was still owned by J. L. Hovey, all of the barns and outbuildings were destroyed by fire, though the large house built by Griswold was saved at the time (*Burlington Weekly Free Press* September 2, 1909). Hovey soon began to build a “large barn at Malvern farms to replace the set of buildings burned” (*Burlington Free Press* September 15, 1909). In October of 1909, it was reported, “about 35 neighbors were at the Malvern farms Monday morning to assist in raising the new barn. At noon, the frame was nearly up and boarding well started on the sides” (*Burlington Free Press* October 21, 1909). In 1910, Hovey sold the farm to E.G. Foss in order to go to Oregon to manage a fruit farm (*Burlington Weekly Free Press* January 27, 1910). In 1917, E.G. Foss sold Malvern Farms to Charles F. Eddy (*Burlington Free Press* May 16, 1917). Eddy reportedly operated a creamery at the farm for a short time (*Burlington Free Press* May 11, 1914).

Other buildings in the area may have served as tenements for the stock farm’s employees. For example, one newspaper article in 1913 reported that, “J.P. Bolan will move . . . to one of E.E. [sic] Foss’ tenements on the Malvern Farm in Morristown, where Mr. Boylan is employed” (*Burlington Free Press* May 10, 1913).

The 24-room house that Griswold built was destroyed on December 10, 1947, by a fire that started in a chimney and between first and second floors (*Burlington Free Press* December 11, 1947). At the time, the then 450-acre farm was owned by Adelard Besserre who had purchased it ca. 1932 (*Burlington Free Press* December 11, 1947). It was noted that, the “ceilings of the large home, originally 11 feet had been lowered to nine feet; the added air space hampering efforts of firemen” (*Burlington Free Press* December 11, 1947). However, the nearby “77-cow barn and a large shed and a garage both attached to the house” were not damaged (*Burlington Free Press* December 11, 1947). A new house was built on the property by December of 1948, by contractor Clarence C. Miller for Amdee Caron (*Burlington Free Press* December 4, 1948). In 1952, Robert Corrow moved “to the farm known as the New York Farm on the Stowe Road” (*Burlington Free Press* October 4, 1952).

Malvern Farm was composed of several older smaller farms. The primary farm acquired by Griswold to create Malvern Farm was the Dea. Horace Felcher (1799-1883) farm (Gravestone, Riverside Cemetery, Morristown, Vermont; Mower 1935:43). Horace Felcher was listed in the federal census in Morristown as a head of household in 1830, 1840, and 1850 (U.S. Census 1830, 1840, 1850). Horace Felcher subsequently moved to Bakersfield, Vermont, and was listed there in the 1860, 1870, and 1880 census (U.S. Census 1860, 1870, 1880).

Additional farms that may have become part of Malvern Farm include the “S.H. Rand” farm (possibly Stillman H. Rand (1816-1870), brother of Bradford L. Rand); the “A.E. Smith” farm, and the “W.G. Ferrin” farm (Figure 121). The W.G. Ferrin farm may have started out in the 1830s as the farm of John Ferrin (1788-1865), and may have been transferred to his son, Whitman G. Ferrin (ca. 1818-1896), a lawyer who in 1850 lived in Johnson, Vermont (Gravestone, Riverside Cemetery, Morristown, Vermont; Mower 1935:43; U.S. Census 1850; Vermont Secretary of State, Vermont Vital Records 1720-1908).

Today, this farm complex consists of the 1948 house, numerous early 1900s barns and outbuildings, and a concrete stave silo with rounded metal roof (Figures 115 – 120). A large gambrel roof, ground-level stable barn with a smaller gambrel roof barn (possible milk house) attached to its north elevation runs parallel to, and sits closest to VT Route 100. Behind this barn, is a long, gable roof barn. The barns have clapboard siding and metal roofs; portions of the roofs appear to be in poor condition. There are also several small, gable roof outbuildings with clapboard siding that appear contemporaneous to the barns. A shed/garage with opens bays and a sloped roof lies south of the barns; it appears to have a later construction date. The 1948 house has a gable roof and eaves front orientation to the road; it rests on a concrete foundation and has little to no stylistic details. A house that was likely the former A.E. Smith or W.G. Ferrin house, and probably incorporated into the Malvern Farm, is located along the west side of VT Route 100 (Figure 121). It likely originally dates to the 1830s or 1840s, but has been greatly altered.



Figure 115. View southwest of the former Malvern Farm location on the west side of VT Route 100.



Figure 116. View southwest of the house at the former Malvern Farm location on the west side of VT Route 100.



Figure 117. View northwest of the former Malvern Farm location on the west side of VT Route 100.



Figure 118. View southwest of gambrel roof barns at the former Malvern Farm location on the west side of VT Route 100.



Figure 119. View northwest of gambrel roof barns and silo at the former Malvern Farm location on the west side of VT Route 100.



Figure 120. View northwest of gable roof barn at the former Malvern Farm location on the west side of VT Route 100.



Figure 121. View west of former A.E. Smith or W.G. Ferrin house on the west side of VT Route 100, just south of the former Malvern Farm.

Webster/Chaffee

The Webster/Chaffee house and barn complex is located along the both sides of VT Route 100, near the southern end of the Morrisville-Stowe Airport (see Figure 108). The building on the west side of the road is labeled “W. Webster” on the Walling map (1859) and “D. L Chaffee” on the Beers map (1878) (see Figures 106 and 107). “W. Webster” may refer to Wingate Webster who also owned the next farm south. The “D.L. Chaffee” defiantly refers to Dana L. Chaffee (1833-1900) (Gravestone, LaPorte Cemetery, Morrisville, Vermont). Child’s Gazetteer of 1883 lists Dana Chaffee as a farmer with 110 acres (Child 1883:347). After Chaffee’s death, his estate sold this farm to Levi S. Gile, a “prosperous farmer,” in 1901 (*News and Citizen* May 22, 1901). Later, in 1926, A. C. Bedell sold this farm to Frank Ward, along with 30 cows (*Burlington Free Press* October 14, 1926).

The property currently consists of a much-altered Classic Cottage form house with a former carriage barn wing on its south elevation, and a barn complex located across VT Route 100, on the east side of the road (Figures 122 and 123). The barn complex includes a large, gambrel roof barn with a projecting gambrel roof entrance on its west elevation, facing the road, a small, gable roof wing on its south side, and a gable roof barn addition on its east elevation. It appears to date to near the turn of the 20th century.

Webster/Rand

The Webster/Rand house is also located along the west side of VT Route 100, just beyond the southern end of the Morrisville-Stowe Airport (see Figure 108). It is labeled “W. Webster” on the Walling map (1859) and “B.L. Rand” on the Beers map (1878). This “W. Webster” refers to Wingate Webster (1796-1865), a native of New Hampshire, who appears to have been first to settle this property (Gravestone, Riverside Cemetery, Morristown, Vermont; U.S. Census 1850). One old newspaper article remarked that, “Wingate Webster . . . also an early settler and long a resident, [lived] where Capt. Rand now lives” (*News and Citizen* March 23, 1882). Beginning with the U.S. Census of 1830, Wingate Webster was listed as a head of household in Morristown (U.S. Census 1830, 1840, 1850, 1860). This farm (65 acres) was later owned by Capt. Bradford L. Rand (1809-1895) and worked by his son, Charles A. Rand (1855-1930) (Child 1883:348; Gravestones, LaPorte Cemetery, Morristown, Vermont; Mower 1935:43). This farm appears to have been converted into “large poultry farm” by Robert Houle in the 1950s (*Burlington Free Press* October 12, 1959).

This house consists of a former Greek Revival style Classic Cottage that has been greatly altered by a front porch and two story projecting bay on its east elevation; a small fragment of former Greek Revival style trim exists on the buildings southeast corner (Figure 124). Buildings located across VT Route 100 from the house consist of modern structures associated with a landscaping business (Figure 125).



Figure 122. View northwest of former Webster/Chaffee house on the west side of VT Route 100.



Figure 123. View northeast of barns across from the former Webster/Chaffee house, on the east side of VT Route 100.



Figure 124. View northwest of former Webster/Rand house on the west side of VT Route 100.



Figure 125. View southeast of structures across from the former Webster/Rand house, on the east side of VT Route 100.

Recommended Significance and Determination of Effect

Most of the 15 buildings at the Morrisville-Stowe State Airport appear to be less than 50 years old, with at least seven dating to 1984 and later. This review recommends that none of the buildings possess the distinctive characteristics of building type, period and method of construction, or quality of significance, to be considered eligible for inclusion on the National Register of Historic Places, so no buildings within the airport are considered significant historic resources.

Review of potentially historic, 19th century to early 20th century farmsteads located along VT Route 100 nearby the Morrisville-Stowe State Airport, recommends that due primarily to alteration, none of the properties retain the qualities of significance to be eligible for inclusion on the National Register of Historic Places. All of the mid to late 1800s houses have been greatly altered and no longer retain integrity of design, materials, workmanship, feeling and association. Although the former Malvern Farm property preserves a relatively unaltered barn complex that dates to the early 1900s, condition of the buildings affects their integrity.

This Historic Resources Review of the installation of perimeter fencing and associated work, including building demolition at the airport and tree clearing, at the Morrisville-Stowe State Airport located in Morrisville, Lamoille County, Vermont, therefore recommends that the project will have No Effect on significant historic resources. No further historic resources review is recommended.

SUMMARY

The Vermont Agency of Transportation (VTrans), with assistance from C&S Engineers, Inc. and EIV Technical Services, proposes the installation of perimeter fencing, and associated work, at three airports: Caledonia County State Airport located in Lyndonville, Caledonia County, Vermont; Middlebury State Airport, located in Middlebury, Addison County, Vermont; and Morrisville-Stowe State Airport, located in Morrisville, Lamoille County, Vermont (Figure 1). The proposed projects will include the installation of chain link fence at new locations and improvements to existing fence at each of the airports (Figure 2). The goal of the projects is to increase the safety of airport operations by providing secure facilities and reducing the probability of people and wildlife straying onto Air Operations Area (AOA) surfaces. This Historic Resources Review was conducted to assist with compliance of Section 106 of the National Historic Preservation Act of 1966 and its amendments. As part of this review, field inspections of the project areas were conducted on April 11 and 13, 2017, by Catherine Quinn, Historic Preservation Specialist at the University of Vermont Consulting Archaeology Program, and historic research of the airports and nearby properties was undertaken.

As a result of this Historic Resources Review, the following determinations for historic significance and effect are recommended for each airport project:

Caledonia County State Airport

Two buildings located within the Caledonia County State Airport, the ca. 1870 Pudding Hill School, and a 1929 Esline Hangar, had the potential to be significant historic resources. Although the school building retains much of its historic character and possesses integrity of design, materials and workmanship, the schoolhouse has lost its integrity of location, setting, feeling and association. Modifications to the original design of the hangar have significantly affected its integrity of design, materials and workmanship. This review therefore recommends that the Pudding Hill School and the Esline hangar do not retain the quality of significance to be eligible for inclusion on the National Register of Historic Places.

This review recommends that three nearby farm complexes, the Ray/Easterbrooks farm complex (ca. 1855), the Proctor farm complex (ca. 1860/1870), and the Ruggles farm complex (ca. 1850), retain the qualities of significance to be eligible for inclusion on the National Register of Historic Places. All three properties retain their historic character and possess integrity of location, design, setting, materials, workmanship, feeling and association. This review recommends that they are significant at the local, state and national level under Criterion A, for their association with the broad pattern of agriculture in Vermont, and under Criterion C for their distinctive characteristics of building types, period and method of construction. The proposed fence installation project will have No Effect on two of the properties (Ray/Easterbrooks and Proctor), because there is existing fence already in place along the northern edge of the airport in view of the farmsteads. The third property (Ruggles) will likely be able to view some portion of the new fencing; however, this review recommends that the viewshed impacts will be very minimal and a No Adverse Effect on the property is recommended.

This Historic Resources Review of the installation of perimeter fencing and associated work at the Caledonia County State Airport located in Lyndonville, Caledonia County, Vermont, there recommends that overall, the project will have *No Adverse Effect* on significant historic resources. No further historic resources review is recommended for the Caledonia County State Airport.

Middlebury State Airport

Four buildings within the Middlebury State Airport had the potential to be significant historic resources: two, ca. 1950 arched roof hangars, a ca. 1930 T-hangar, and a second T-hangar, which dates after 1962 and by 1974. Review of these latter four buildings, recommends that they do not possess the distinctive characteristics of building type, period and method of construction, or quality of significance, to be considered eligible for inclusion on the National Register of Historic Places, so no buildings within the airport are considered significant historic resources. No historic resources were identified nearby the airport.

This Historic Resources Review of the installation of perimeter fencing and associated work at the Middlebury State Airport located in East Middlebury, Addison County, Vermont, therefore recommends that the project will have *No Effect* on significant historic resources. No further historic resources review is recommended.

Morrisville-Stowe Airport

None of the buildings within the Morrisville-Stowe State Airport were identified as potentially historically significant. This review recommends that none of the buildings possess the distinctive characteristics of building type, period and method of construction, or quality of significance, to be considered eligible for inclusion on the National Register of Historic Places.

Review of potentially historic, 19th century to early 20th century farmsteads located along VT Route 100 nearby the Morrisville-Stowe State Airport, recommends that due primarily to alteration, none of the properties retain the qualities of significance to be eligible for inclusion on the National Register of Historic Places. All of the mid to late 1800s houses have been greatly altered and no longer retain integrity of design, materials, workmanship, feeling and association. Although the former Malvern Farm property preserves a relatively unaltered barn complex that dates to the early 1900s, condition of the buildings affects their integrity.

This Historic Resources Review of the installation of perimeter fencing and associated work at the Morrisville-Stowe State Airport located in Morrisville, Lamoille County, Vermont, therefore recommends that the project will have *No Effect* on significant historic resources. No further historic resources review is recommended.

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U.S. Department of
Transportation

New England Region

1200 District Avenue
Burlington, MA 01803

Federal Aviation
Administration

October 28, 2025

Greg Socinski
Historic Resource Specialist
Vermont Division for Historic Preservation
1 National Life Drive
David Building, 6th Floor
Montpelier, VT 05620

NO ADVERSE EFFECT
Vermont Division for Historic Preservation

Signed by:

E88B1289163F42E...

Date: 11/25/2025

State Historic Preservation Office

RE: Determination of Effects Middlebury – Middlebury State Airport, Middlebury, VT

Dear Mr. Socinski:

The Federal Aviation Administration (FAA) New England Office is seeking concurrence for a determination under Section 106 of the National Historic Preservation Act (NHPA) for a proposed undertaking at the Middlebury State Airport located in Middlebury, Vermont. The proposed undertaking consists of the construction of a new terminal building and associated improvements.

After reviewing the enclosed Section 106 Effect Finding and its attachments, the FAA has concluded that the proposed undertaking would have no adverse effect on historic and cultural resources and that obligations under Section 106 of the NHPA have been fulfilled. I respectfully request your review of the proposed undertaking as well as your concurrence or objection to the enclosed determination. If you have any questions, please feel welcome to contact me at Cheryl.J.Quaine@faa.gov.

Sincerely,

Cheryl Quaine Digitally signed by Cheryl Quaine
Date: 2025.10.28 12:43:08 -04'00'

Cheryl Quaine
Environmental Program Manager
Federal Aviation Administration

Enclosures

Cc: Judith Ehrlich, Vermont Agency of Transportation
Jeannine Russell, Vermont Agency of Transportation
Taylor Koutropoulos, CHA Consulting, Inc.



State of Vermont
 Division for Historic Preservation
 1 National Life Dr., Davis Building, 6th Floor
 Montpelier, Vermont 05620-0501
<https://accd.vermont.gov/historic-preservation>

Agency of Commerce and
 Community Development

[Phone] 802-461-6191

HISTORIC PRESERVATION PROJECT REVIEW COVER FORM

Please complete this form and attach it to the top of all information submitted to this office for review. Accurate and complete forms will assist in the timely processing and response to your request. Submit the completed form and supporting materials to the Project Review Inbox at ACCD.ProjectReview@Vermont.gov.

1. DOES THIS INFORMATION RELATE TO A PREVIOUSLY SUBMITTED PROJECT? Please check box.

☒ If you have checked this box and noted the previous Project Review (PR) number assigned by this office you do not need to continue unless any of the required information below has changed.

1a. PREVIOUS PROJECT REVIEW NUMBER or PROJECT NAME

Middlebury State Airport -- Various Projects

TOWN Middlebury

COUNTY Addison

2. IS THIS A NEW PROJECT?

Please check box

☐ If you have checked this box you will need to complete ALL of the following information

Project Name

Location

You MUST include street number, street name and/or County, State or Interstate route number if applicable.

Point Data

GIS Coordinates/Location Information/UTM Latitude-Longitude

City/Town/Village

List the correct city/town/village in which your project is being undertaken.

County

If the undertaking covers multiple towns/counties please email a list defining all towns/counties included with your digital submission at ACCD.Projectreview@vermont.gov.

PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PROJECT (include a more detailed summary or cover letter describing the details of your project as an attachment.)

Project involves construction of a new terminal building and associated improvements.

The Historic Preservation Review Process in Vermont

In order to insure that historic preservation is carefully considered in publicly-funded or permitted undertakings, there are laws at each level of government that require projects to be reviewed for their potential impact/effect on historic properties.

These laws include:

- **10 V.S.A. Chapter 151 - Act 250/Criterion 8** - For projects requiring a new Act 250 permit or an amendment to an existing permit.
- **Section 248** - Public Service Board - For projects requiring a Certificate of Public Good.
- **22 V.S.A. Chapter 14** -The Vermont Historic Preservation Act - For projects with state involvement in the form of funding, licenses or permits.
- **Section 106 of the National Historic Preservation Act of 1966** - For projects with federal involvement in the form of funding, licenses or permits.

Regulations on line at: <http://accd.vermont.gov/historic-preservation/resources-rules>

Project review consists of identifying a project's potential impacts to historic buildings and structures, historic districts, historic landscapes and settings, and to known or potential archaeological resources. Project review is a consultative process between the applicant and the Division. Applicants are encouraged to contact our office as early as possible in the project planning process. We can assist in identifying historic resources in the project area and provide guidance on how to evaluate and avoid potential adverse effects to those resources as an outcome of the project. While protecting historic resources, this can save you time and money in the development of your project.

TYPE OF REVIEW REQUIRED/REQUESTED (Please answer both questions)

1. Does this action involve a permit approval or funding, now or ultimately from any other governmental agency?

☒ **Yes** ☐ **No** If yes, list agency name(s) and permit(s)/approval(s) ☐ **Don't Know Yet**

Agency Involved

- ☒ Section 106 ☐ Section 248 - PSB
☐ 22 VSA ☐ Other
☐ Act 250

2. Does the project site involve or is it near a property listed or recommended for listing in the Vermont State or National Registers of Historic Places? ☒ **Yes** ☐ **No** ☐ **Unknown**

ALL PROJECTS SUBMITTED FOR REVIEW SHOULD INCLUDE THE FOLLOWING MATERIALS

- ☒ **Project Description** – Attach a full description of the nature and extent of the work to be undertaken as part of this project. Relevant portions of project applications to other state and/or federal agencies and environmental statements may be submitted if applicable.
- ☒ **Location Map** - Include a map locating the project in the community. The map must clearly show street and road names surrounding the project area as well as the location of all portions of the project. Appropriate maps to include are USGS quadrangle map or google map.

- ☒ **Site Plan** – The site plan should include the project boundaries and areas of proposed excavation and construction, as applicable.
- ☐ **Project Plans** – Architectural and/or engineering plans drawings, etc.
- ☒ **Photographs** - Photographs may be scanned black-and-white prints, digital images, color prints or color photo copies; save them as either JPEGs or in a PDF format. Standard (black & white) photocopies are not accepted.

Architecture

Are there any **resource(s)** (buildings, structures such as bridges, walls, culverts, and objects), districts or landscapes within the project area? ☒ Yes ☐ No If no, please skip to the Archaeology section.

If yes, please submit the following information: To research a building click on the link to access our [Online Research Center](#)

- ☒ The resource is 50 years old or older - Approximate age(s):
- ☐ The resources(s) are listed in the State or National Register of Historic Places
☐ Individually ☐ part of a historic district ☐ Unknown
- ☒ Photographs of **each** resource or streetscape within the project area, with captions, along with a photo key. (Digital photographs are accepted. All photographs must be clear, crisp and focused.)
- ☐ If the project involves rehabilitation, demolition, additions, or alterations to existing buildings or structures, provide additional photographs showing detailed project work locations. (i.e. Detail photo of windows if window replacement is proposed.)

Archaeology

Does the proposed undertaking involve ground-disturbing activity? ☒ Yes ☐ No

If yes, please submit the following information:

- ☒ Description of current and previous land use and disturbance.
- ☐ Available information concerning known or suspected archaeological resources within the project area (such as cellar holes, wells, foundations, dams, etc.)

Please note that for many projects an architectural and/or archaeological survey or other additional information may be needed to complete the review process.

CONTACT PERSON FOR PROJECT

Name & Title

Firm/Agency

Address

City State Zip

Phone

email

FEDERAL AVIATION ADMINISTRATION
SECTION 106 NO ADVERSE EFFECT FINDING
Pursuant to 36 CFR Section 800.11(e)
SECTION 4(F) COMPLIANCE REQUIREMENTS

DESCRIPTION OF THE UNDERTAKING

The purpose of the Proposed Action is to serve existing light general aviation activity by providing and rehabilitating support facilities for aircraft, pilots, and passengers. The Middlebury State Airport currently lacks a terminal building. The Middlebury State Airport Master Plan recommended supporting airport users by constructing a 1,500-2,000 square foot (sq. ft.) terminal facility and installing electric vehicle chargers for aircraft and vehicles. The proposed undertaking will include the following elements:

- Development of an approximately 1,800 sq. ft. single-story terminal building
- Construction of an approximately 4,400 sq. ft. vehicular parking lot
- Relocation of an existing patio/picnic area
- Rehabilitation of an approximately 8,900 sq. ft. apron area
- Installation of 6 additional aircraft tie-downs (apron markings with anchors that designate aircraft parking positions; see **Attachment A** for photos)
- Installation of approximately 260 linear feet of new security fencing
- Installation of electric vehicle chargers for automobiles and aircraft
- Construction of stormwater improvements
- Extension of 3-phase power from State Road 113

AREA OF POTENTIAL EFFECT

[Pursuant to 36 CFR Section 800.4(a)(1)]

The Area of Potential Effect (APE) for below ground resources was based on the Proposed Action's construction limits. The APE for above ground resources was based on the Proposed Action's potential to cause direct impacts to resources within the proposed construction limits and indirect impacts to resources within the viewshed. **Attachment B** shows the limits of the APE.

EFFORTS TO IDENTIFY RESOURCES

[Pursuant to 36 CFR Section 800.4(b)]

The effort to identify resources included a review of available historic and cultural resource investigations and the completion of a supplemental Historic Resource Review. Archaeological phase II testing was completed as part of the Section 106 process for the Middlebury Airport Master Planning Project in October of 2021. Testing was completed by Northeast Archeological Research Center, Inc. in an Archaeologically Sensitive Area (ASA) found within the forested area west of the northern-most hangar at Middlebury

State Airport. The partial location of the ASA is shown in **Attachment B**. Native American artifacts were recovered resulting in the identification of site VT-AD-1359 and subsequent National Register eligibility based on the high density of artifacts recovered from the site. However, site VT-AD-1359 is outside of the APE for this project and will be avoided. The Vermont Agency of Transportation Archaeology Officer reviewed the APE for this project and recommends no further archaeological investigation based on evidence of extensive existing development and landform alterations associated with the construction of roadways, a surface parking lot, and apron area within the direct APE.

A Historic Resource Review was conducted for Middlebury State Airport in April 2017 in reference to a prior fencing project at the Airport. Of the fourteen structures reviewed for their eligibility to be listed on the National Register of Historic Places (NRHP), four structures met the fifty year old threshold in 2017 and were reviewed for eligibility. However, none of the structures were considered eligible for the NRHP. The Vermont Division for Historic Preservation concurred with the 2017 findings. A supplemental Historic Resource Review was completed in June of 2025 (see **Attachment C**). A total of eighteen structures were identified within the APE. Only three structures were found to be at least fifty years old. Two of those structures were determined to not be eligible for inclusion in the NRHP due to a lack of distinguishing features. One structure, defined as Box Hangar #5, was determined to be potentially eligible for the NRHP. **Attachment B** identifies the structure that is potentially eligible for the NRHP.

ELIGIBILITY DETERMINATIONS

[Pursuant to 36 CFR 800.4(c)]

A supplemental Historic Resource Review was completed in June of 2025 (see **Attachment C**). One resource, Box Hangar #5, was determined to be potentially eligible for the NRHP. Box Hangar #5 illustrates Vermont's pioneering role in mid-20th century air transport by embodying key hallmarks of hangar design from that era. Its exposed steel frame, corrugated-metal siding, and bowstring-truss roof demonstrate postwar advances in prefabrication and the functionalist aesthetic. This resource maintains its original form, materials, and workmanship, preserving a tangible record of Vermont's public-works aviation facilities of the mid-20th century. Box Hangar #5 meets National Register Criteria A and C.

EFFECT FINDING

[Pursuant to 36 CFR 800.5(b)]

Effects to below ground resources are not anticipated given that below ground resources are not expected to be present. For indirect impacts, the Proposed Action will have No Adverse Effect on the one eligible structure (Box Hangar #5). The new terminal building would be constructed approximately 380 feet south of Box Hangar #5. The viewshed from

Box Hangar #5 looking south towards the new terminal building is obstructed by three hangars. The new terminal building and associated undertakings will be consistent with existing development at Middlebury State Airport (see **Attachment D** for a rendering of the new terminal building). A topographic map is provided for context (see **Attachment E**). The Proposed Action will not impact the integrity of the resource.

SECTION 4(F) COMPLIANCE REQUIREMENTS

This undertaking will not convert property from any Section 4(f) historic resources to a transportation use; the FAA has determined the appropriate Section 106 finding is "No Adverse Effect"; therefore, a Section 4(f) evaluation is not required.

Cheryl Quaine

Digitally signed by Cheryl
Quaine

Date: 2025.10.28 12:45:21

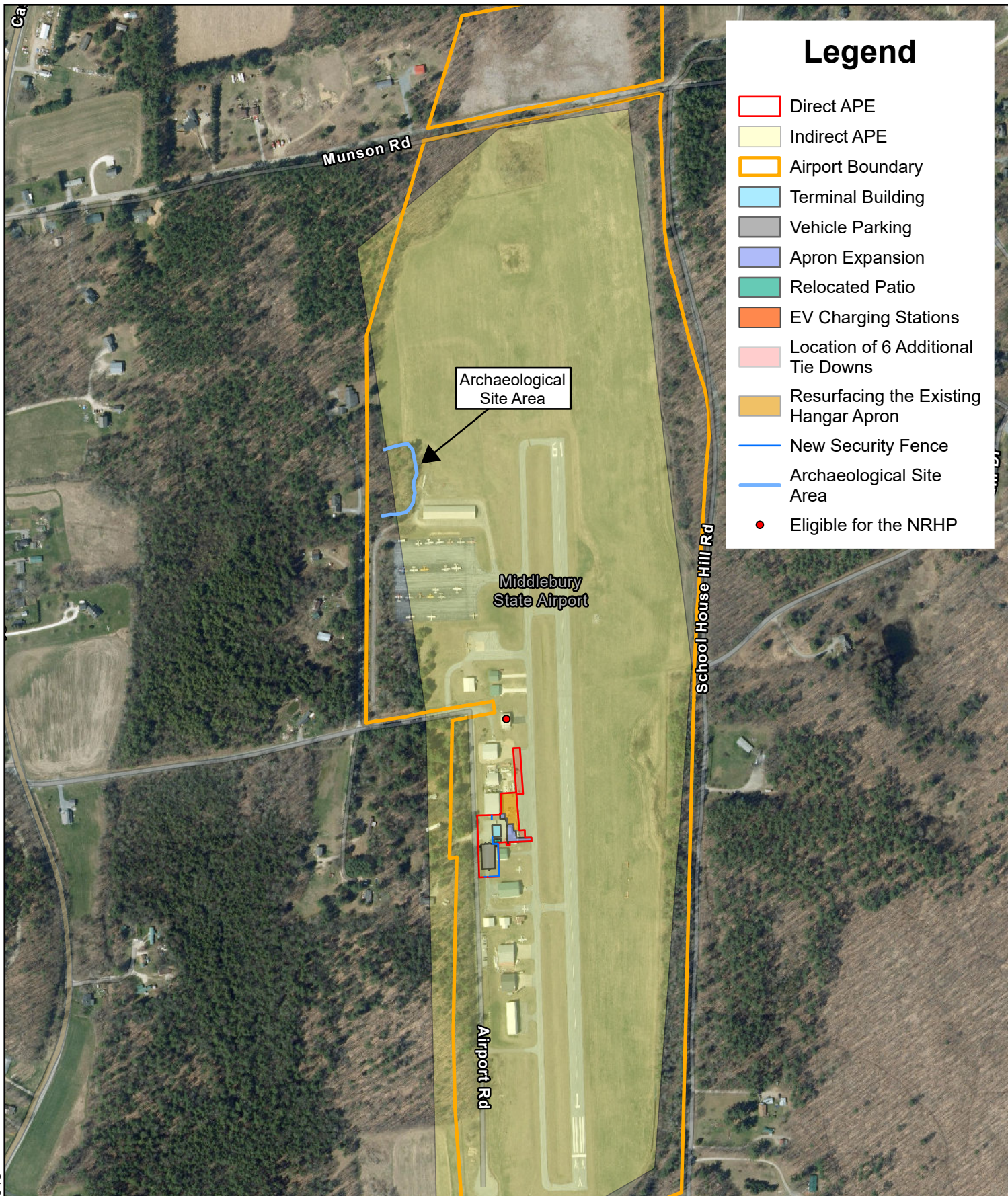
Cheryl Quaine, Environmental Program Manager
Federal Aviation Administration
New England Region

Approved Date

Attachment A:
Example Photos
Aircraft Tie-down



Attachment B:
Area of Potential Effect



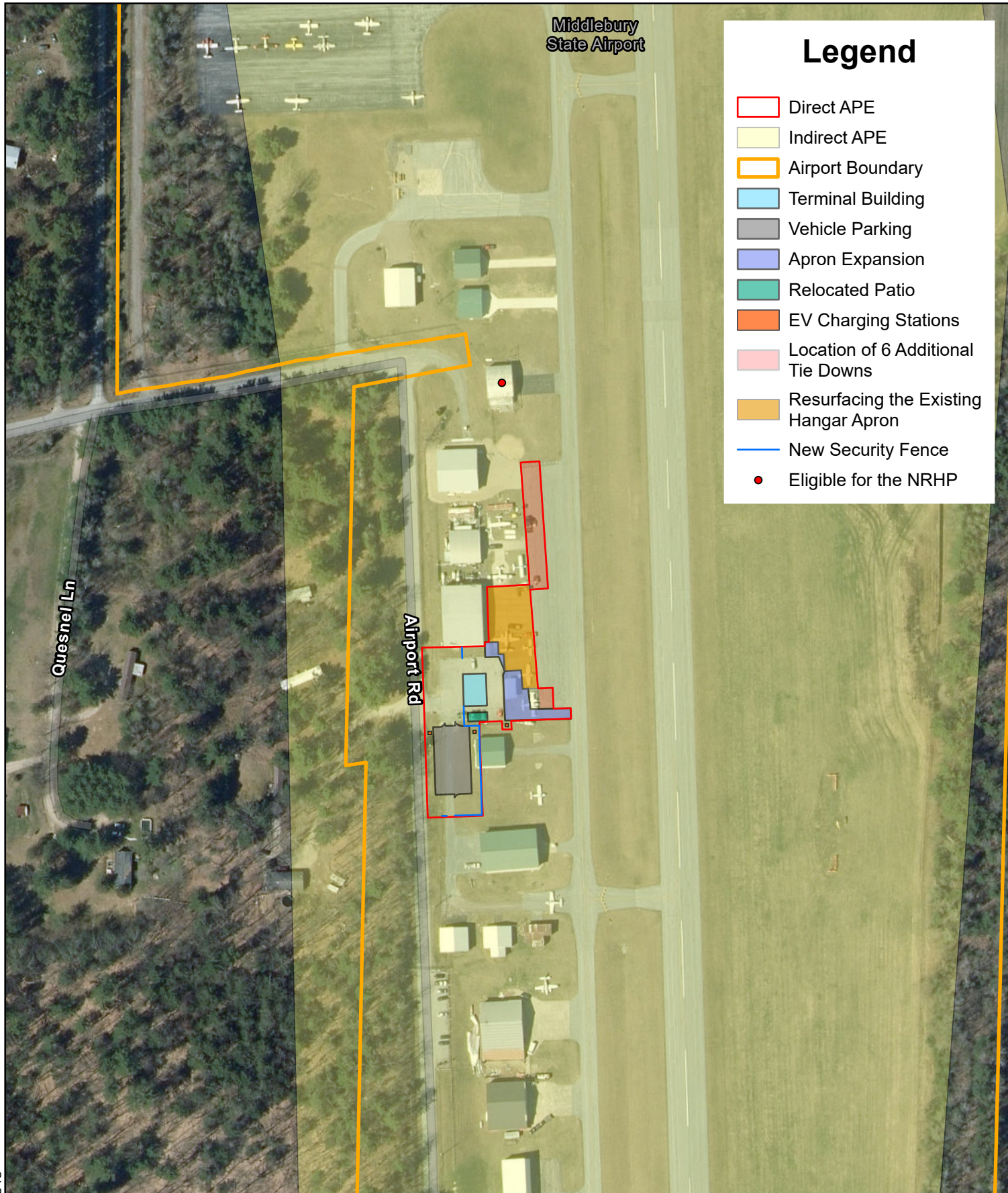
1" = 550'

CHA No.
087308

Attachment B

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan, Hartgen



1" = 200"

CHA No.
087308

Attachment B

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan, Hartgen

Attachment C:
2025 Historic Resource Review

HISTORIC RESOURCES IDENTIFICATION

Middlebury Terminal Building

Airport Road
Middlebury
Addison County, Vermont

HAA # 6281-HRI

Submitted to:

Taylor Koutropoulos, ENV SP
Environmental Planner, Assistant Project Manager
CHA
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www.acra-crm.org

June 25, 2025

MANAGEMENT SUMMARY

18 resources surveyed. One NRE

Report Authors: *Brian Knight*
Date of Report: *June 25, 2025*

TABLE of CONTENTS

1	Introduction.....	1
2	Project Location and Description	1
2.1	Description of the Area of Potential Effects (APE).....	1
3	Historical Background.....	1
3.1	Previously Surveyed Properties	3
4	Streetscape Views.....	4
5	Architectural Descriptions.....	6
5.1	Resource 1. 467 Airport Road — T-Hangar #1	6
5.2	Resource 2. 467 Airport Road — Storage Building #2	6
5.3	Resource 3. 467 Airport Road — Box Hangar #3	7
5.4	Resource 4. 467 Airport Road — Box Hangar #4	8
5.5	Resource 5. 467 Airport Road — Box Hangar #5	9
5.6	Resource 6. 467 Airport Road — Box Hangar #6	11
5.7	Resource 7. 467 Airport Road — Box Hangar #7	11
5.8	Resource 8. 467 Airport Road — Building #8 /FBO Office/Terminal	12
5.9	Resource 9. 467 Airport Road — Building #9 / Picnic Pavilion.....	13
5.10	Resource 10. 467 Airport Road — Box Hangar #10.....	14
5.11	Resource 11. 467 Airport Road — Box Hangar #11.....	15
5.12	Resource 12. 467 Airport Road — Box Hangar #12.....	16
5.13	Resource 13. 467 Airport Road — T-Hangar #13.....	17
5.14	Resource 14. 467 Airport Road — Building #14 / Sand Storage Shed.....	18
5.15	Resource 15. 467 Airport Road — T-Hangar #15.....	19
5.16	Resource 16. 467 Airport Road — Box Hangar #16.....	20
5.17	Resource 17. 467 Airport Road — T-Hangar #17.....	21
5.18	Resource 18. 467 Airport Road — Box Hangar #18.....	22
6	Project Impact Assessment	23
7	National Register Eligibility.....	23
8	Bibliography	26

Maps

Qualifications

Figure List

Figure 1.	2009 Development Plan.....	3
Figure 2.	1999 View of Resource 5 (Hartgen Archeological Associates 1999).....	10

Photo List

Photo 1.	View of Airport Road looking north.....	4
Photo 2.	View of Airport Road looking south.....	4
Photo 3.	View of the airport looking south.....	5
Photo 4.	View of the airport looking north.....	5
Photo 5.	View of Resource 1 looking northwest	6
Photo 6.	View of Resource 2 looking southwest	7
Photo 7.	View of Resource 3 looking west.....	8
Photo 8.	View of Resource 4 looking west.....	9
Photo 9.	View of Resource 5 looking southwest	10
Photo 10.	View of Resource 6 looking west.....	11
Photo 11.	View of Resource 7 looking west.....	12

Photo 12. View of Resource 8 looking west.....	13
Photo 13. View of Resource 9 looking west.....	14
Photo 14. View of Resource 10 looking west.	15
Photo 15. View of Resource 11 looking southwest.	16
Photo 16. View of Resource 12 looking southeast.....	17
Photo 17. View of Resource 13 looking southwest.	18
Photo 18. View of Resource 14 looking southwest.	19
Photo 19. View of Resource 15 looking west.	20
Photo 20. View of Resource 16 looking southwest.	21
Photo 21. View of Resource 17 looking southwest.	22
Photo 22. View of Resource 18 looking northwest.....	23

Table List

Table 1. Summary of Resources Surveyed for the Middlebury Terminal Study Area	24
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1 Introduction

Hartgen Archeological Associates, Inc. (Hartgen) conducted a Historic Resources Identification Assessment for the proposed Middlebury Terminal (Project) located in Middlebury, Addison County, Vermont (Map 1). The Project requires approvals by the Vermont Agency of Transportation (VTrans). This investigation was conducted to comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and will be reviewed by VTrans.

Background research was conducted at the Vermont Division for Historic Preservation (VDHP) ORC (Online Resource Center) site, where archeological site files, National Register (NR), State Register (SR), and town information were reviewed. A site visit was conducted by Brian Knight on June 11, 2025, to observe and photograph existing conditions within the Project Area.

2 Project Location and Description

The project is located at Middlebury Airport (6BO) at 467 Airport Road, Middlebury, Vermont. Middlebury State Airport is located in the town of East Middlebury, in Addison County, in the western part of Vermont. The airport lies to the west of VT Route 116, northeast of the town center.

2.1 Description of the Area of Potential Effects (APE)

The area of potential effects (APE) includes all portions of the property that the proposed undertaking will directly or indirectly alter. The APE encompasses approximately 155 acres.

3 Historical Background

Middlebury received its charter from Governor Benning Wentworth on November 2, 1761, as one of the New Hampshire Grants, and settlers arrived soon after the Revolutionary War to clear Otter Creek's falls for sawmills and gristmills (Swift 1859). Local entrepreneurs Gamaliel Painter and Abisha Washburn built the first mills at the creek, and by the early nineteenth century, the village hosted cotton and woolen factories, a paper mill, and marble quarrying that shaped its early economy (Coolidge and Mansfield 1859).

The town fathers founded Middlebury College in 1800 as an outgrowth of the Addison County Grammar School, and the institution began classes under President Jeremiah Atwater that same year, establishing Vermont's first operating college (Coolidge and Mansfield 1859). The arrival of the Rutland & Burlington Railroad in 1849 linked Middlebury to broader markets, spurring growth in commerce and manufacturing throughout the late nineteenth century.

On August 23, 1928, the Middlebury Register and Addison County Journal reported that resident John Ingalls joined pilot John Rogerson on a return flight to Springfield, covering the route in under an hour and showcasing the practicality of regular air service to and from Middlebury. Observers noted clear skies and smooth handling by Rogerson, who emphasized that the flight's success underscored "a wonderful chance for development of Middlebury Airport" (Middlebury Register and Addison County Journal 1928). This demonstration flight marked one of the first public affirmations of Middlebury's potential as an aviation hub, sparking local interest in establishing a formal airfield to serve the region's emerging air-transport needs.

Middlebury's first airfield, "located close to Route 7, a little south of Middlebury Village," operated irregularly in the 1920s and more regularly from circa 1930 into the 1940s (Burlington Free Press 1954). On July 24, 1930, the *Middlebury Register and Addison County Journal* reported that Ward F. Davidson, research engineer with the Brooklyn Edison Company, landed at Middlebury Airport after flying from Hickville, L.I.. He spent the weekend visiting his son at the Keewaydin camp, arranged repairs to his monoplane, and returned on Sunday (Middlebury Register and Addison County Journal 1930).

The Middlebury Airport officially opened on August 9, 1930, with a three-day air meet organized by Middlebury Airways, Inc., and the local Chamber of Commerce. The event featured bombing planes and diverse aircraft to showcase the airport's new facilities and promote regional aviation (Burlington Free Press 1930). Governor John Weeks and Mrs. Weeks attended the official opening of Middlebury Airport on September 1, 1930. Fourteen aircraft joined the celebration, which began with a regimental band concert. The governor inspected each machine and conversed with the attending pilots before presiding over formal dedication remarks. Local dignitaries highlighted the airport's modern hangars and runways as vital assets for Vermont's expanding air services. The festivities concluded with aerial demonstrations, confirming the field's operational readiness for commercial and private flights (Burlington Free Press and Times, 1930).

Middlebury Airport secured both federal and state certification on May 31, 1946. Vermont Aeronautics Commission Director R. F. Knapp and Civil Aeronautics Administration Inspector Reginald L. Reed inspected the field and confirmed its compliance with all safety standards. The airport commenced licensed operations for all aircraft types and offered complimentary ground transportation to the field. Officials planned additional summer improvements, including hangar construction and enhanced aircraft servicing facilities, with full availability expected by autumn 1946 (Middlebury Register and Addison County Journal 1946). A 40-by-60-foot hangar was built in late August 1946 under the operation of Green Mountain Airways Inc. The new structure accommodated four aircraft and replaced the existing hangar, which was repurposed as a machine shop (Burlington Free Press 1946).

Pilots and townspeople found that “with the houses and pastures so close and the multitude of high-powered wires and the nearness of traffic, it seemed desirable to seek another location,” leading to the selection of a hidden East Middlebury farm field “which had nearly overgrown with trees” (Burlington Free Press 1954).

Robert Hunt leased the property in 1950, and in 1952 Leonard Zeeman cleared and leveled a 2,300-foot runway “with bulldozers,” moving the airport headquarters there that spring (Burlington Free Press 1954). The first plane landed at East Middlebury in November 1952 (Burlington Free Press 1954).

The late-November 1950 storm uprooted trees across Middlebury and caused significant damage at the local airfield. High winds blew out plate-glass windows at nearby buildings and struck the airport, where two aircraft sustained damage while the primary hangar remained intact despite nearby impacts (Burlington Free Press 1950; Rutland Daily Herald 1950; Burlington Daily News 1950).

On October 15, 1956, a fire destroyed the airport's hangar and three airplanes, inflicting an estimated \$20,000 in losses. Investigators found the blaze consumed the 40-by-60-foot structure under unclear circumstances, and authorities did not identify a definitive cause or plan further inquiry (Burlington Free Press 1956; Rutland Daily Herald 1956; Valley News 1956; St. Albans Daily Messenger 1956).

The Quesnel Family privately developed the Middlebury State Airport in the 1950s for aerial pesticide application (Town of Middlebury 2025). The Town of Middlebury acquired the facility in 1966 and paved Runway 1–19, which then measured 2,500 by 50 feet. The State of Vermont Aeronautics Board took ownership in 1970 and rededicated it as the Middlebury State Airport. The Vermont National Guard constructed a gravel parallel taxiway (Taxiway ‘A’) in 1976, when the town also acquired additional land and built an apron. Subsequent improvements included fuel farm installation in 1993, runway rehabilitation in 2000, terminal building and hangar construction in 2003, and a runway extension in 2017 (Town of Middlebury 2025).

Today, Middlebury balances its eighteenth-century roots in mills and education with modern amenities in transportation, publishing, and preservation, reflecting over two centuries of civic initiative.

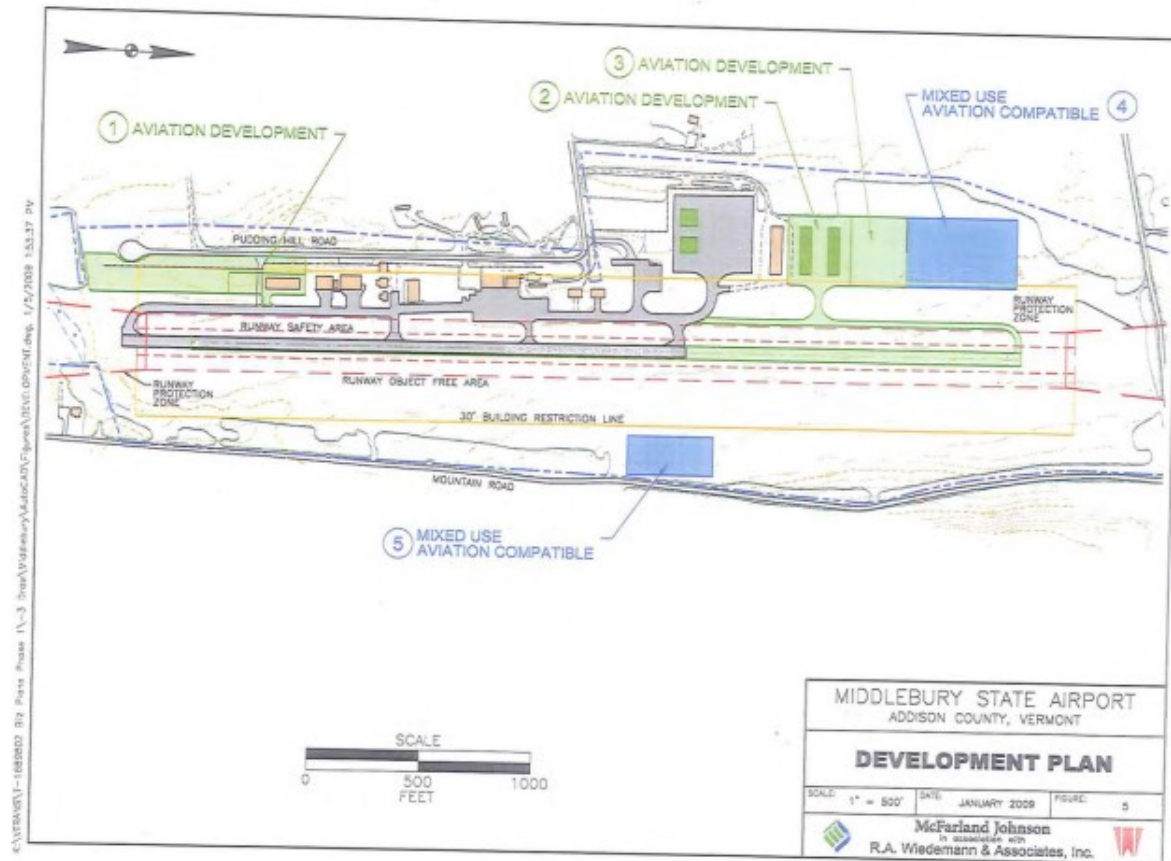


Figure 1. 2009 Development Plan

3.1 Previously Surveyed Properties

An examination of the files at VDHP identified no NR listed (NRL) properties, no NR eligible (NRE) properties, no properties previously determined to be ineligible, and no properties of undetermined status within the APE. These properties are indicated in Table 1 on Page 24.

4 Streetscape Views



Photo 1. View of Airport Road looking north.



Photo 2. View of Airport Road looking south.



Photo 3. View of the airport looking south.



Photo 4. View of the airport looking north.

5 Architectural Descriptions

5.1 Resource 1. 467 Airport Road — T-Hangar #1

Resource 1 is known as T Hangar #1 (Photo 5). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 1985, this one-story, gable-roofed, eight-stall T-hangar rests on a poured concrete slab foundation. The structure is clad in vertical-ribbed metal siding and capped by a low-pitched, standing-seam metal roof. The overall form is rectangular with a broad footprint extending along the east–west axis. Each of the long eaves elevations contains four evenly spaced aircraft bays with flush-panel rolling metal doors. These bays are delineated by shallow reveals in the wall plane, indicating structural framing intervals. The west gable end contains a pedestrian entrance and two windows. The entry door is a steel unit with an applied diagonal cross-brace and is set beneath a plain metal lintel. To the left of the door are two adjacent aluminum-frame eight-over-one double-hung sash windows with a continuous metal sill. These likely illuminate a small office or utility room located within the hangar footprint. The north and south façades are largely unembellished, consistent with the building’s utilitarian function, though a narrow roof overhang on the south end likely shelters a secondary access point or mechanical equipment area.

Resource 1 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 5. View of Resource 1 looking northwest.

5.2 Resource 2. 467 Airport Road — Storage Building #2

Resource 2 is known as Storage Building #2 (Photo 6). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2010, this one-story, gable-roofed, two-bay equipment storage building rests on a poured concrete slab foundation. The structure is clad in vertical metal panel siding and topped with a standing seam metal roof. The north-facing gable end contains two large

overhead sectional doors with rectangular glazing panels arranged in two horizontal bands. A small gable vent is located at the roof peak above the doors, providing attic ventilation. Bollards protect the door openings from vehicular impact. Along the west elevation, a shed-roofed mechanical structure is affixed to the building. This open-framed lean-to is supported by diagonal timber bracing and shelters fuel or maintenance equipment. A single small window is visible on the west wall of the primary structure.

Resource 2 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 6. View of Resource 2 looking southwest.

5.3 Resource 3. 467 Airport Road — Box Hangar #3

Resource 3 is known as Box Hangar #3 (Photo 7). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2022, this one-story, gable-roofed, one-bay box hangar rests on a poured concrete slab foundation. The structure is clad with vertical metal panel siding in a light tan color and is capped by a green standing-seam metal roof. The gable front is dominated by a full-width hangar door system composed of black translucent panels set in a white aluminum grid frame, likely a bifold or hydraulic lift door. A single personnel door is integrated into the lower right corner of the hangar door. Narrow, continuous clerestory venting panels run beneath the roof eaves on the side elevations.

Resource 3 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 7. View of Resource 3 looking west.

5.4 Resource 4. 467 Airport Road — Box Hangar #4

Resource 4 is known as Box Hangar #4 (Photo 8). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2005, this one-story, gable-roofed, one-bay box hangar rests on a poured concrete slab foundation. The structure is clad in vertical metal panel siding and a standing seam metal roof. The gable front is dominated by a full-width bifold hangar door composed of vertically ribbed metal panels. The door extends nearly the full height and width of the façade, providing access for light aircraft. The building has a simple, rectilinear footprint with no fenestration on the front elevation. The side elevations are unadorned.

Resource 4 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 8. View of Resource 4 looking west.

5.5 Resource 5. 467 Airport Road — Box Hangar #5

Resource 5 is known as Box Hangar #5 (Photo 9 and Figure 2). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 1950, this one-story, arched-roofed, one-bay box hangar rests on a concrete slab foundation. The structure is sheathed in corrugated metal siding and topped with a shallow-pitched segmental arch roof, also clad in metal. The building's front (north) elevation features a pair of large sliding doors mounted on an external overhead track supported by a timber-framed gantry. The hangar includes a wood-frame addition on the west side, featuring a row of six-over-six windows and vertical board siding.

Resource 5 meets National Register Criteria A and C for its association with the growth of Vermont's early air transportation network and for its embodiment of the distinctive characteristics of mid-20th-century airport hangar construction. Its intact steel-frame structure, corrugated-metal cladding, and bowstring-truss roof illustrate postwar advances in prefabrication and functionalist design that defined hangar architecture of the period. Resource 5 retains high integrity of design, materials, and workmanship, and its continued physical presence documents the evolution of public works aviation facilities in Vermont during the mid-1900s.



Photo 9. View of Resource 5 looking southwest.



Figure 2. 1999 View of Resource 5 (Hartgen Archeological Associates 1999).

5.6 Resource 6. 467 Airport Road — Box Hangar #6

Resource 6 is known as Box Hangar #6 (Photo 10). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2024, this one-story, gable-roofed, one-bay box hangar rests on a concrete slab foundation and is clad in vertical metal panel siding. The building is topped with a standing seam metal roof and displays minimal architectural ornamentation. The gable-front façade features a full-width bifold hangar door composed of the same vertical metal cladding as the rest of the structure. The hangar sits on a raised gravel bed that transitions to a newly paved asphalt apron in the foreground.

Resource 6 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 10. View of Resource 6 looking west.

5.7 Resource 7. 467 Airport Road — Box Hangar #7

Resource 7 is known as Box Hangar #7 (Photo 11). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2006, this one-story, arched-roofed, one-bay box hangar rests on a poured concrete slab foundation. The structure is clad with vertical metal siding and is topped with a shallow segmental-arched metal roof. The front (north) elevation features large, sliding hangar doors occupying nearly the entire façade. These doors, which match the wall cladding, are mounted on an exterior track system. A personnel door is located at the west corner of the façade, providing secondary access to the interior.

Resource 7 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 11. View of Resource 7 looking west.

5.8 Resource 8. 467 Airport Road — Building #8 /FBO Office/Terminal

Resource 8 is known as Building #8/ FBO Office/Terminal (Photo 12). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2000, this one-story, gable-roofed, one-bay hangar and terminal rests on a poured concrete slab foundation. The building is clad in vertical metal siding and capped with a shallow-pitched standing seam metal roof. The front (east) elevation features a full-width hydraulic lift door. Attached to the north end of the elevation is a projecting terminal office section distinguished by a standard commercial entry door, multi-light windows, and exterior signage.

The 5,400-square-foot facility combines a community hangar with a small office suite. VTrans owns the building and leases it in full to J & M Aviation for on-field aircraft maintenance. In the southern section, J & M Aviation provides a pilot/passenger lounge complete with a restroom and seating.

Resource 8 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 12. View of Resource 8 looking west.

5.9 Resource 9. 467 Airport Road — Building #9 / Picnic Pavilion

Resource 9 is known as Building #9 / Picnic Pavilion (Photo 13). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2005, this one-story, shed-roofed open pavilion is supported by regularly spaced square wood posts and features exposed rafter tails and a shallow-pitched roof slope. The roof is sheathed with corrugated metal panels, and the structural frame is constructed of dimensional lumber. The pavilion is open on all sides, with no enclosing walls or cladding.

Resource 8 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 13. View of Resource 9 looking west.

5.10 Resource 10. 467 Airport Road — Box Hangar #10

Resource 10 is known as Box Hangar #10 (Photo 13). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2005, this one-story, arched-roofed, one-bay box hangar rests on a poured concrete slab foundation. The structure is clad in vertical metal siding and is topped with a low segmental-arched standing seam metal roof. A flush-mounted full-width hangar door dominates the front (east) elevation, likely a bifold or panel lift system.

Resource 10 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 14. View of Resource 10 looking west.

5.11 Resource 11. 467 Airport Road — Box Hangar #11

Resource 11 is known as Box Hangar #11 (Photo 15). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2010, this one-story, arched-roofed, one-bay box hangar rests on a poured concrete slab foundation. The structure is clad in vertical metal panel siding with a two-tone finish. It is topped with a shallow segmental-arched standing seam metal roof. The side elevation features four horizontal sliding aluminum-frame windows spaced at regular intervals, and a flush pedestrian access door near the corner.

Resource 11 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 15. View of Resource 11 looking southwest.

5.12 Resource 12. 467 Airport Road — Box Hangar #12

Resource 12 is known as Box Hangar #12 (Photo 16). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 1980, Built ca. 1970, this one-story, gable-roofed, one-bay box hangar rests on a poured concrete slab foundation. The structure is clad in vertical T1-11 plywood siding, and is topped with a low-pitched asphalt-shingled roof. The front (east) elevation is dominated by a wide, hangar door system composed of matching vertical panels. A small louvered attic vent is centered near the gable peak.

Resource 12 is not eligible for inclusion in the National Register of Historic Places due to a lack of distinguishing features.



Photo 16. View of Resource 12 looking southeast.

5.13 Resource 13. 467 Airport Road — T-Hangar #13

Resource 13 is known as T-Hangar #13 (Photo 17). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca.1980, this one-story, gable-roofed, one-bay storage T-hangar rests on a concrete slab foundation. The structure is clad in T1-11 vertical plywood siding with visible joint seams and is topped with a low-pitched metal roof. The gable front features wide, sliding barn-style doors supported by an overhead rail system. A small metal vent is set near the gable peak for attic ventilation.

Resource 13 is not eligible for inclusion in the National Register of Historic Places due to a lack of distinguishing features.



Photo 17. View of Resource 13 looking southwest.

5.14 Resource 14. 467 Airport Road — Building #14 / Sand Storage Shed

Resource 14 is known as Building #14 / Sand Storage Shed (Photo 18). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 1930, this one-story, shed-roofed, one-bay storage shed is clad in vertical corrugated metal siding and capped with a corrugated metal roof. The long, shallow-pitch shed roof slopes downward toward the rear of the building, and the structure exhibits exposed framing and minimal architectural detailing.

In 2017, the Vermont Agency of Transportation commented on the above-ground resources at the Middlebury Airport for a fencing project. The report provided a summation of the resources, and Resource 12 was

[a] ca. 1930 corrugated metal T-hangar now on the property was moved from the earlier airport in Middlebury to this facility. Its initial location at the current airport was on the east side of the runway, but it was moved to its current location in the late 1960s or early 1970s (Russell, Jeannine, and Judith Williams Ehrlich 2017).

Resource 14 is not eligible for inclusion in the National Register of Historic Places due to a lack of distinguishing features.



Photo 18. View of Resource 14 looking southwest.

5.15 **Resource 15. 467 Airport Road — T-Hangar #15**

Resource 15 is known as T-Hangar #15 (Photo 19). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 1980, this one-story, gable-roofed, one-bay T-hangar rests on a concrete slab foundation. The structure is clad in board-and-batten siding and topped with a standing seam metal roof. The central gable front features a large, upward-folding hangar door that spans nearly the entire façade. The door is faced in metal and contains four rectangular lights. To the left (south) of the hangar door is a small service bay with a lower shed roof, featuring a paneled overhead door and adjacent pedestrian entry.

Resource 15 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 19. View of Resource 15 looking west.

5.16 **Resource 16. 467 Airport Road — Box Hangar #16**

Resource 16 is known as Box Hangar #16 (Photo 20). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 1980, this one-story, gable-roofed, one-bay box hangar rests on a poured concrete slab foundation. The main structure is clad in board-and-batten siding and capped with a standing seam metal roof. The hangar door system, mounted on the gable front, consists of a vertically paneled, multi-section upward-folding metal door. A single personnel door is located at the southeast corner of the façade. A one-story, shed-roofed addition extends the full length of the south elevation. This addition is also clad in board-and-batten siding and has a lower roofline subordinate to the primary structure. A multi-light window is visible on the front face of the addition.

Resource 16 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 20. View of Resource 16 looking southwest.

5.17 Resource 17. 467 Airport Road — T-Hangar #17

Resource 17 is known as T-Hangar #17 (Photo 21). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2005, this one-story, gable-roofed, three-bay storage T-hangar rests on a poured concrete slab foundation. The structure is clad in vertical metal siding and is topped with a standing seam metal roof. The long façade features three evenly spaced hangar bays, each accessed via wide, double-leaf rolling doors that align with recessed structural divisions. Each bay includes a flush metal personnel door positioned adjacent to the hangar openings. The side and rear elevations are unadorned.

Resource 17 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 21. View of Resource 17 looking southwest.

5.18 **Resource 18. 467 Airport Road — Box Hangar #18**

Resource 18 is known as Box Hangar #18 (Photo 22). It has not been previously surveyed for the Vermont State Register or the National Register of Historic Places. Built ca. 2024, this one-story, gable-roofed, three-bay storage T-hangar rests on a poured concrete slab foundation. The structure is clad in vertical metal siding with contrasting lighter siding on the front elevation. It is topped with a shallow-pitched, standing-seam metal roof. Each of the three hangar bays features a wide, bifold lift door framed by steel tracks, with integrated personnel doors at the outer corners.

Resource 18 is not eligible for inclusion in the National Register of Historic Places due to insufficient age.



Photo 22. View of Resource 18 looking northwest.

6 Project Impact Assessment

No direct impacts on any of these structures or the proposed district are anticipated. National Register Eligibility Summary

7 National Register Eligibility

A total of 18 resources were surveyed for this project.

In 2017, Catherine Quinn of the UVM Consulting Archaeology Program reviewed above-ground resources at Middlebury Airport for a perimeter fencing project. The report provided a summation of the resources and

[b]ased on aerial photographs and Google Earth historic imagery, only a few structures at the airport were built by 1962, with most built after 1974, and several constructed in the 2000s. A ca. 1930 corrugated metal T-hangar now on the property was moved from the earlier airport in Middlebury to this facility. Its initial location at the current airport was on the east side of the runway, but it was moved to its current location in the late 1960s or early 1970s. There was an arched-roofed hangar on the site by 1954. On October 15, 1956, a hangar at Middlebury airport burned with three planes and a significant amount of equipment inside. It is not known if the building that burned was an arched roof hangar, but there are now two arched roof hangars (probably ca. 1950) on the property (Kenny, Kate 2017).

The report gave a historic significance statement for Middlebury Airport, stating that

[t]he majority (10) of the buildings at the Middlebury State Airport are less than 50 years old. The two, ca. 1950 arched roof hangars (one of which may have been modified when it was moved), the ca. 1930 T-hangar, and possibly the second T-hangar, which dates after 1962

and by 1974, are the only structures that had the potential to be significant historic resources. However, review of these latter four buildings, recommends that they do not possess the distinctive characteristics of building type, period and method of construction, or quality of significance, to be considered eligible for inclusion on the National Register of Historic Places, so no buildings within the airport are considered significant historic resources (Kenny, Kate 2017).

While the 2017 report did not identify Resource 5 as a significant resource, it is potentially eligible for the National Register of Historic Places under Criteria A and C. It illustrates Vermont's pioneering role in mid-20th-century air transport by embodying key hallmarks of hangar design from that era. Its exposed steel frame, corrugated-metal siding, and bowstring-truss roof demonstrate postwar advances in prefabrication and the functionalist aesthetic. Resource 5 maintains its original form, materials, and workmanship, preserving a tangible record of Vermont's public-works aviation facilities of the mid-20th century.

Resources 13 & 14 achieved the 50-year-old threshold for National Register of Historic Places eligibility. These two resources, however, are not eligible for inclusion in the National Register of Historic Places due to a lack of distinguishing features. The remaining 15 resources were not eligible for inclusion in the National Register of Historic Places due to insufficient age.

Table 1. Summary of Resources Surveyed for the Middlebury Terminal Study Area

Building No. (see Map 2)	Resource Address	Construction Date	Historic Use or Name	Previous Survey and/or NR status	Recommended National Register Status
1	467 Airport Road	Ca.1985	T Hangar #1	None	Not NRE
2	467 Airport Road	Ca.2010	Storage Building #2	None	Not NRE
3	467 Airport Road	Ca.2022	Box Hangar #3	None	Not NRE
4	467 Airport Road	Ca.2005	Box Hangar #4	None	Not NRE
5	467 Airport Road	Ca.1950	Box Hangar #5	None	NRE
6	467 Airport Road	Ca.2024	Box Hangar #6	None	Not NRE
7	467 Airport Road	Ca.2006	Box Hangar #7	None	Not NRE
8	467 Airport Road	Ca.2000	Building #8/ FBO Office/Terminal	None	Not NRE
9	467 Airport Road	Ca.2005	Building #9 / Picnic Pavilion	None	Not NRE
10	467 Airport Road	Ca.2005	Box Hangar #10	None	Not NRE
11	467 Airport Road	Ca.2010	Box Hangar #11	None	Not NRE
12	467 Airport Road	Ca.1980	Box Hangar #12	None	Not NRE
13	467 Airport Road	Ca.1970	T-Hangar #13	None	Not NRE
14	467 Airport Road	Ca.1930	Building #14 / Sand Storage Shed	None	Not NRE
15	467 Airport Road	Ca.1980	T-Hangar #15	None	Not NRE
16	467 Airport Road	Ca.1980	Box Hangar #16	None	Not NRE
17	467 Airport Road	Ca.2005	T-Hangar #17	None	Not NRE

Middlebury Terminal Building, Middlebury, Vermont
 Historic Resources Identification

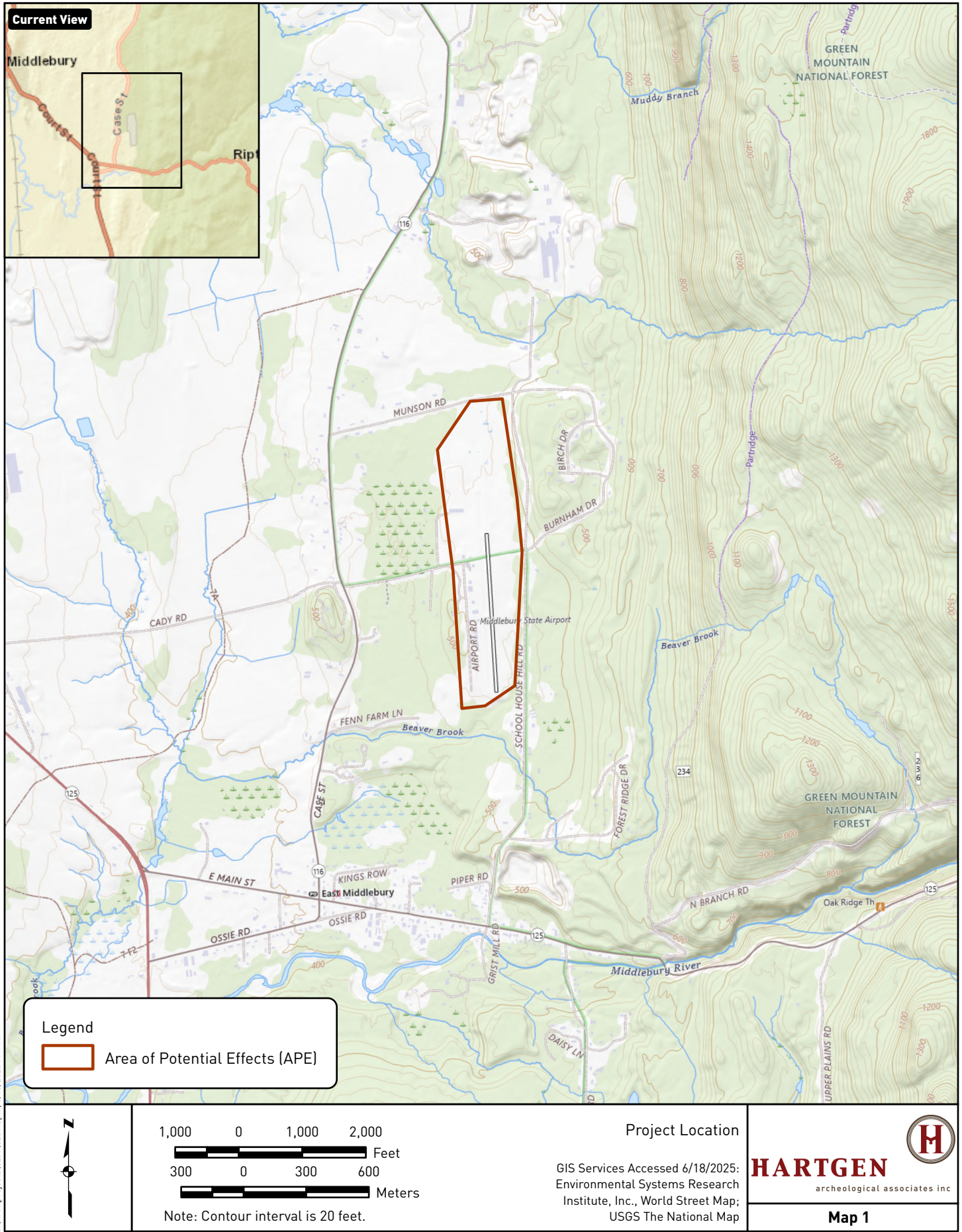
Building No. (see Map 2)	Resource Address	Construction Date	Historic Use or Name	Previous Survey and/or NR status	Recommended National Register Status
18	467 Airport Road	Ca.2024	Box Hangar #18	None	Not NRE

8 Bibliography

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- St. Albans Daily Messenger. 1956. "Middlebury Airport Hangar Fire Unresolved." *St. Albans Daily Messenger*, October, 2.
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Maps

Middlebury Airport Terminal, Airport Road, Town of Middlebury, Addison County, Vermont
 Historic Resource Identification



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1000 0 100 200

Feet

30 0 30 60

Meters

Legend

 Structure Number

 Photo Angle

 Area of Potential Effects (APE)

 Parcel Boundary

Project Map

Vermont Center for Geographic Information, Orthoimagery, 2024

**HARTGEN**
archeological associates inc

Map 2a



Qualifications



QUALIFICATIONS: 36 CFR 61 Qualified. Meets the Secretary of Interior's Professional Qualification Standards. Experienced at conducting historic resource survey, assessment, and documentation as outlined in NPS- 28: *Cultural Resource Management Guidelines*, the Secretary of Interior's *Standards and Guidelines for Archeological and Historical Preservation* (US DOI 1983), and Section 106 of the National Historical Preservation Act.

EDUCATION: 1997 University of Vermont
Master of Science, Historic Preservation
1993 University of Vermont
Bachelor of Arts, Political Science

PROJECT EXPERIENCE—STATE AGENCY:

- 2022 Vermont Police Academy/Vermont TB Sanitarium, Pittsford, VT. Sanatorium/Hospital. Project sponsor: State of Vermont. Hartgen.
- 2021 Roxbury Fish Hatchery, Roxbury, VT. National Register nomination -Fish Hatchery. Project Sponsor: Vermont Fish and Wildlife.

PROJECT EXPERIENCE—NON-PROFIT CULTURAL INSTITUTIONS:

- 2021 St. Mary's Margaret Church, Arlington, VT. Section 106 Review/VARI Form. Project Sponsor: Arlington Arts and Enrichment.

PROJECT EXPERIENCE—ENERGY HYDRO:

- 2024 Essex Hydro #19, Essex, VT. Historic Resource Inventory. Project Sponsor: HDR. Hartgen #5640.
- 2021 Moretown #8 Hydropower, Moretown, VT. Vermont Architectural Resource Inventory form and Determination of Eligibility. Project sponsor: Ampersand Hydro.
- 2016 Gilman Hydropower, Lunenburg, VT. Historic Resource Management Plan. Project sponsor: Ampersand Hydro.

PROJECT EXPERIENCE—ENERGY TRANSMISSION:

- 2012-2014 Northern Pass, Multiple, NH. Historic Resource Survey. Project sponsor: Project Sponsor. Northern Pass Transmission, LLC.

PROJECT EXPERIENCE—ENERGY RENEWABLES:

- 2024 South Hill Road Wind, Villenova, NY. Historic Resources Survey. Project sponsor: New Leaf Energy. Hartgen #6013.
- 2024 Somers Solar, Fort Edward, NY. Historic Resources Survey. Project sponsor: CS Energy, LLC. Hartgen #5913.
- 2024 ELP Granby Solar II, Granby, NY. Historic Resources Survey. Project sponsor: VC Renewables LLC. Hartgen #6060.
- 2018 Camp Marbury, Ferrisburgh, VT. National Register Nomination: Summer Camp. Project Sponsor: Vermont Energy Renewables.
- 2018 Dairy Air Wind Turbine, Holland, VT. Historic Resources Survey. Project Sponsor: Vermont Energy Renewables.

PROJECT EXPERIENCE—TELECOM:

- 2024 FCC Verizon East Windsor 2, East Windsor, VT. Section 106 review. Project sponsor: Trileaf. Hartgen #6080.
- 2024 Five Verizon CT Towers, Multiple, CT. Historic Resource Survey and FCC Form 621 . Project sponsor: Trileaf. Hartgen #6085.
- 2024 FCC Verizon Penn Yan, Penn Yan, NY. Historic Resources Survey and Section 106 Review. Project sponsor: GSS Inc. Hartgen #6083.
- 2024 FCC Verizon Cambridge Tower, Cambridge, NY. Historic Resource Survey and FCC Form. Project sponsor: Trileaf. Hartgen #6079.

PROJECT EXPERIENCE—TRANSPORTATION:

- 2023 North Hollow & Bryan Road Crossings, Stowe, VT. Historic Resources Survey. Project sponsor: Hoyle, Tanner & Associates, Inc. Hartgen #5995.

- 2023 VTrans Chester STP 20232 7, Chester, VT. Historic Resources Survey. Project sponsor: Stantec Consulting Services, Inc. Hartgen #6025.
- 2023 North Street Bridge 8, Brandon, VT. Historic Resources Survey. Project sponsor: Dubois & King. Hartgen #5960.
- 2023 New Haven Munger Street Scoping Study, New Haven, VT. Historic Resources Survey. Project sponsor: Fuss & O'Neill, Inc. Hartgen #5959.

PROJECT EXPERIENCE—SECTION 106/ACT 250 REVIEW

- 2024 FCC Verizon East Windsor 2, East Windsor, VT. Project sponsor: Trileaf. Hartgen #6080.
- 2024 69 Main Street, Vergennes, VT. Project Sponsor: John Graham Housing and Services. Hartgen #5991.
- 2023 Hagar Warehouse, Burlington, VT. Project Sponsor: The Flynn.
- 2021 St. Mary's Margaret Church, Arlington, VT. Project Sponsor: Arlington Arts and Enrichment.
- 2021 St. Paul's Church, Hartford, VT. Project Sponsor: Twin Pines Housing.
- 2021 Reynolds Dam, Dorset, VT. Project sponsor: Poultney Mettowee Natural Resources Conservation District.
- 2021 16 Chapin Street, Rutland, VT. Project Sponsor: Rutland County Parent Child Center.
- 2021 219 Pleasant Street, Bennington, VT. Project Sponsor: Hale Resources.
- 2018 Cold Spring Brook Park Dam, Weston, VT. Project Sponsor: Town of Weston.
- 2018 H.N. Williams Store, Dorset, VT. Project Sponsor: Cephas Kent LLC.
- 2018 343 Safford Street, Bennington, VT. Project Sponsor: Neighborworks of Western Vermont.
- 2017 Commons Building, Bennington, VT. Project Sponsor: Center-Line Architects.

PROJECT EXPERIENCE—HISTORIC RESOURCE SURVEYS:

- 2024 Jericho Riverside Village, Jericho, VT. Project Sponsor: Stantec Consulting Services. Hartgen #5599.
- 2024 Burke STP BP 21, Burke, VT. Project Sponsor: Sponsor: Stantec Consulting Services Inc. Hartgen #5882.
- 2024 Shelburne Post-War Neighborhoods, Shelburne, VT. Project Sponsor: Town of Shelburne.
- 2023 Tinmouth TAP TA22 2, Tinmouth, VT. Project Sponsor: Tinmouth TAP TA22 2. Hartgen #6030.
- 2023 Dorset STP BP21(17), Dorset, VT. Project Sponsor: Dubois & King. Hartgen #5875.
- 2023 Springfield North Gateway Riverwalk, Springfield, VT. Project Sponsor: Stantec Consulting Services Inc. Hartgen #5934.
- 2022 Newfane STP BP21(18), Newfane, VT. Project Sponsor: Dubois & King. Hartgen #5860.
- 2021 Pittsford TAP TA 20(9), Pittsford, VT. Project Sponsor: Dubois & King. Hartgen #5680.
- 2021 Taft's Flat Neighborhood, Hartford, VT. Project Sponsor: Town of Hartford/Certified Local Government Program/State of Vermont.

PROJECT EXPERIENCE—HISTORIC RESOURCE DOCUMENTATION PACKAGE:

- 2023 Wallace Dam, Dorset, VT. Dam. Project sponsor: Poultney Mettowee Natural Resources Conservation District.
- 2022 Reynolds Dam, Dorset, VT. Dam. Project sponsor: Poultney Mettowee Natural Resources Conservation District.
- 2021 Manchester Music Hall, Manchester, VT. Opera House/Music Hall. Project Sponsor: Equinox Hotel.

PROJECT EXPERIENCE—STATE INVENTORY FORMS & DETERMINATION OF ELIGIBILITY REPORTS

- 2024 Ocean Boulevard and Hampton Casino, Hampton Beach, NH. Tourism. NH Area and Building form. Project Sponsor: FHI Studio. Hartgen #5631.
- 2024 Lee Communitywide Historic Resource Survey, Lee, MA. MHC Form A and B. Project Sponsor: Lee Historic Commission and Massachusetts Historic Commission.
- 2023 Wallace Dam, Dorset, VT. Dam. VARI/DOE. Project sponsor: Poultney Mettowee Natural Resources Conservation District.

BRIAN L. KNIGHT
Architectural Historian

- 2022 Dracut Mill Navy Yard and Collinsville Neighborhoods Survey, Dracut, MA. MHC Form A and B. Project Sponsor: Lee Historic Commission and Massachusetts Historic Commission.
- 2022 78 Highland Avenue, Stowe, VT. Private residence. VARI/DOE. Project Sponsor: Private.
- 2022 Reynolds Dam, Dorset, VT. Dam. VARI/DOE. Project sponsor: Poultney Mettowee Natural Resources Conservation District.
- 2021 Manchester Music Hall, Manchester, VT. Opera House/Music Hall. VARI/DOE. Project Sponsor: Equinox Hotel.
- 2021 St. Paul's Church, Hartford, VT. Church VARI/DOE. Project Sponsor: Twin Pines Housing.
- 2021 16 Chapin Street, Rutland, VT. Auto Showroom/Daycare. VARI/DOE. Project Sponsor: Rutland County Parent Child Center.
- 2021 219 Pleasant Street, Bennington, VT. Multi-family dwelling. VARI/DOE. Project Sponsor: Hale Resources.
- 2018 Cold Spring Brook Park Dam, Weston, VT. Dam. VARI/DOE. Project Sponsor: Town of Weston.
- 2018 H.N. Williams Store, Dorset, VT. General Store. VARI/DOE. Project Sponsor: Cephas Kent LLC.
- 2018 343 Safford Street, Bennington, VT. Multi-family dwelling. VARI/DOE. Project Sponsor: Neighborworks of Western Vermont.

PROJECT EXPERIENCE—HISTORIC STRUCTURE REPORT:

- 2022 Vermont Police Academy/Vermont TB Sanitarium, Pittsford, VT. Sanatorium/Hospital. Project sponsor: State of Vermont. Hartgen.
- 2017 Cobb & Derby Mill, Springfield, VT. Mill. Project Sponsor: State of Vermont.

PROJECT EXPERIENCE—REHABILITATION INVESTMENT TAX CREDIT:

- 2024 Bennington High School, Bennington, VT. School/Multi-family dwelling. Project sponsor: Hale Resources.
- 2024 Squire House, Bennington, VT. Multi-family dwelling. Project sponsor: Shires Housing.
- 2022 219 Pleasant Street, Bennington, VT. Multi-family dwelling. Project Sponsor: Hale Resources.

PROJECT EXPERIENCE—NATIONAL REGISTER AND NATIONAL LANDMARK NOMINATION:

- 2024 South Hero Village, South Hero, VT. Rural Village. Project sponsor: Preservation Trust of Vermont.
- 2024 Shelburne Shipyard, Shelburne, VT. Shipyard and Marina. Project Sponsor: Town of Shelburne.
- 2024 Maple Corner Village, Calais, VT. Mill Village. Project sponsor: Town of Calais/Certified Local Government Program/State of Vermont.
- 2024 Arlington Village, Arlington, VT. Rural Mill Village. Project sponsor: Preservation Trust of Vermont.
- 2022 Adamant Village, Calais, VT. Rural Village and Music School. Project sponsor: Town of Calais/Certified Local Government Program/State of Vermont.
- 2021 Green Mountain Cottage, Mount Holly, VT. Tourist Accommodation. Project Sponsor: Private
- 2021 Luce Farm, Stockbridge, VT. Farmstead. Project Sponsor: Preservation Trust of Vermont.
- 2021 Shelburne Falls, Shelburne, VT. Mill Village. Project Sponsor: Town of Shelburne.
- 2020 Park Street School, Springfield, VT. School. Project Sponsor: Springfield Regional Development Corporation.
- 2020 East Calais Village, Calais, VT. Mill Village. Project Sponsor: Town of Calais/Certified Local Government Program/State of Vermont.
- 2020 Stockmayer House, Norwich, VT. Mid-Century Modern Building. Project Sponsor: Town of Norwich/ Certified Local Government/State of Vermont
- 2020 Eldridge House, Norwich, VT. Mid-Century Modern Building. Project Sponsor: Town of Norwich/ Certified Local Government/State of Vermont.
- 2020 Maple Hill Farm, Norwich, VT. Farmstead. Project Sponsor: Town of Norwich/ Certified Local Government/State of Vermont.

BRIAN L. KNIGHT
Architectural Historian

- 2019 White River Junction Update, Hartford, VT. Urban. Project Sponsor: Town of Hartford/Certified Local Government Program/State of Vermont.
- 2019 Goodrich Four Corners, Norwich, VT. Rural Village. Project Sponsor: Town of Norwich/ Certified Local Government/State of Vermont.
- 2018 Gilbert's Hill, Woodstock, VT. Ski area/Farmstead. Project Sponsor: Preservation Trust of Vermont.
- 2018 Camp Marbury, Ferrisburgh, VT. Summer Camp. Project Sponsor: Vermont Energy Renewables.
- 2017 Advent Camp Meeting grounds, Hartford, VT. Summer Religious Camp. Project Sponsor: Town of Hartford/Certified Local Government Program/State of Vermont.
- 2013 Philip Livingston School, Albany, NY. School. Project Sponsor: EBI Consulting
- 2012 AH Rice Silk Mill, Pittsfield, MA. Mill. Project Sponsor: Private.
- 2010 West Dover Village Update, Dover, VT. Rural Village. Project Sponsor: Preservation Trust of Vermont.
- 1998 Dog Team Tavern, New Haven, VT. Restaurant. Project Sponsor: Private
- 1998 Brooksville Advent Church, New Haven, VT. Church Project Sponsor: Private

- PUBLICATIONS:**
- 2018 *Snowboarding in Southern: From Burton to the US Open.* Vermont, Acadia Publishing, Charleston, SC
- 2004 *No Braver Deeds: The Story of the Equinox Guards.* Friends of Hildene, Manchester, VT:

Attachment D:
New Terminal Building Rendering

Existing Rendering



Proposed Rendering



1' = 400"

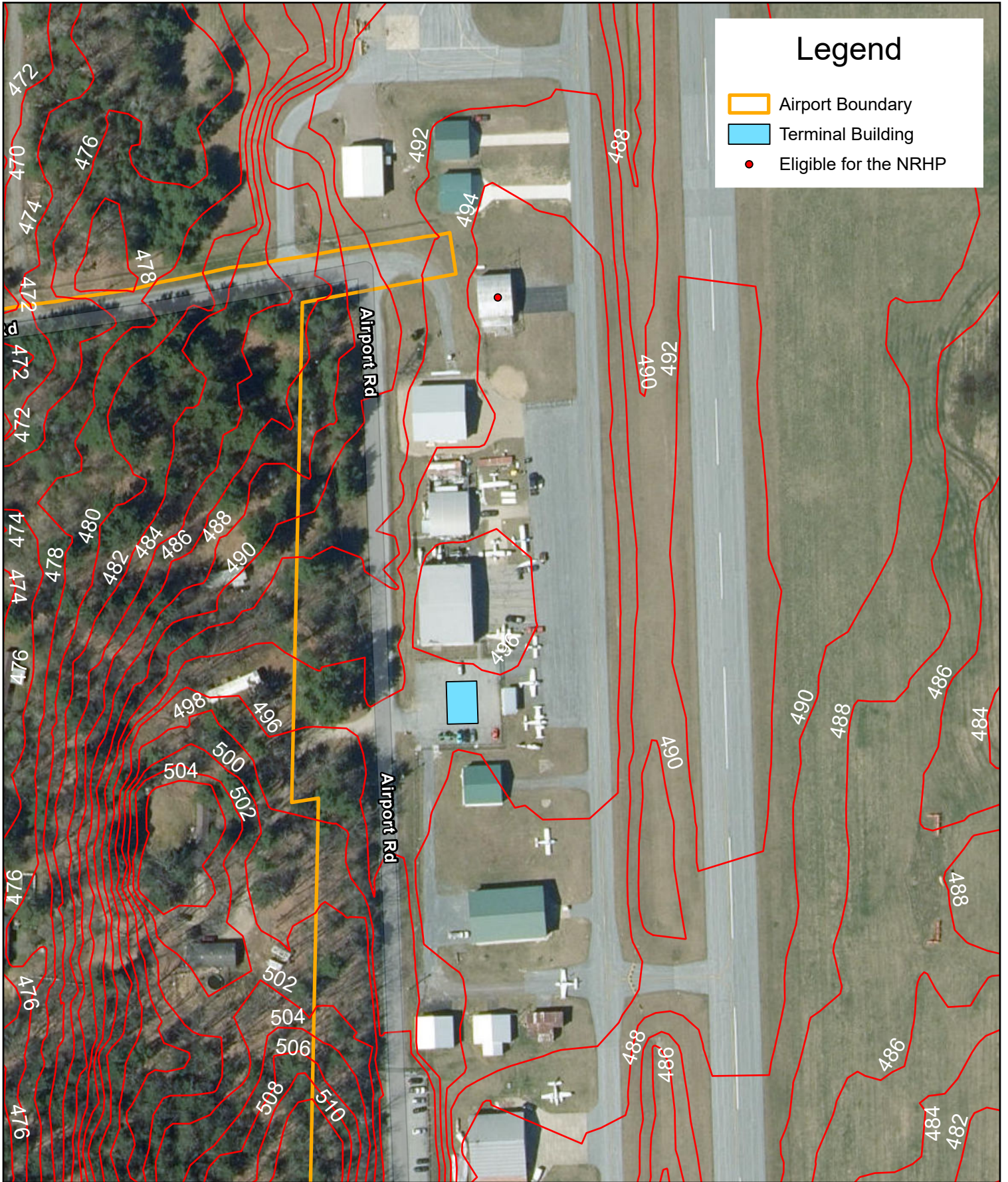
CHA No.
087308

Attachment D: New Terminal Building Rendering

Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan

Attachment E:
Topographic Map



Legend

-  Airport Boundary
-  Terminal Building
-  Eligible for the NRHP

	 	Topographic Map Middlebury State Airport Middlebury, VT
	1" = 150"	CHA No. 087308

APPENDIX C

Agency Coordination

Middlebury State Airport
Environmental Assessment for New Terminal Building
Early Agency Coordination Contact List

Michael Adams
U.S. Army Corps of Engineers
New England District
11 Lincoln Street, Room 210,
Essex Junction, Vermont 05452
michael.s.adams@usace.army.mil

Danielle Fitzko
Commissioner
Vermont Agency of Natural Resources
Vermont Department of Forests, Parks, and
Recreation
1 National Life Drive, Davis 2
Montpelier, Vermont 05620-3801
danielle.fitzko@vermont.gov

Jason Batchelder
Commissioner
Vermont Agency of Natural Resources
Vermont Department of Environmental Conservation
Davis Building – 3rd floor
One National Life Drive
Montpelier, VT 05620-3520
jason.batchelder@vermont.gov

Mr. Everett Marshall
National Heritage Information Manager
Vermont Agency of Natural Resources
Vermont Department of Fish and Wildlife
1 National Life Drive, Davis 2
Montpelier, Vermont 05620-3510
Everett.marshall@vermont.gov

Jennifer Murray
Director of Planning and Zoning
Town of Middlebury
Town Offices, 77 Main Street,
2nd Floor, Middlebury, VT 05753
jmurray@townofmiddlebury.org

Adam Lougee
Executive Director
Addison County Regional Planning Commission
14 Seminary Street
Middlebury, VT 05753
alougee@acrpc.org

Penny Collins
Executive Coordinator
Green Mountain Power
163 Acorn Lane
Colchester, VT 05446
callcenter@greenmountainpower.com

Timothy Timmermann
Director
U.S. Environmental Protection Agency
Region 1: Boston
Office of Environmental Review
5 Post Office Square, Suite 100
(Mail code: O6-3)
Boston, MA 02109-3912
timmermann.timothy@epa.gov

Ms. Laura V. Trieschmann
State Historic Preservation Officer
Vermont Agency of Commerce & Community
Development
Vermont Division for Historic Preservation
1 National Life Drive, Davis Building, 6th floor
Montpelier, Vermont 05620-0501
ACCD.projectreview@vermont.gov

Josh Donabedian
Districts 6 & 9 Coordinator
Act 250
District 9 Environmental Commission
10 Baldwin Street
Montpelier, VT 05633-3201
joshua.donabedian@vermont.gov

John Trombley
Water Division Chief
Water Division
Town of Middlebury
77 Main Street
Middlebury, Vermont 05753
jtrombley@townofmiddlebury.org



December 17, 2024

Jennifer Murray
Director of Planning and Zoning
Town Offices, 77 Main Street,
2nd Floor, Middlebury, VT 05753

Re: **Early Agency Coordination Letter
Environmental Assessment for New Terminal Building
Middlebury State Airport (6B0)
Middlebury, Vermont**

Dear Ms. Murray,

The Vermont Agency of Transportation (VTrans) is preparing an Environmental Assessment (EA) for the construction of a new terminal building at Middlebury State Airport (6B0) in Middlebury, Vermont. The project includes the development of a small single-story terminal building (approximately 1,800 square feet) and the relocation of vehicle parking and fencing. Based on the location of the development and available funding, the project may also include the following components:

- Relocation of an existing covered patio
- Minor aircraft apron expansion
- Installation of electric vehicle (EV) charging stations for vehicles and aircraft
- Extension of 3-phase power service
- Installation of 6 additional tie downs
- Resurfacing of an existing apron

Each of these project components will be evaluated as part of the EA. As identified in the Airport Master Plan (2023), the airport does not currently have a public terminal building. The addition of a new terminal building will accommodate existing light general aviation activity. All proposed work will remain on airport property. Two locations are being evaluated for development. These locations are shown in Figure 1, Figure 2, and Figure 3.

The Federal Aviation Administration (FAA) is the lead federal agency and will ultimately issue an environmental finding on the Proposed Action. The EA process will analyze alternatives, undertake studies, and disclose the potential for environmental impacts that could directly or indirectly occur with the development of the terminal building. The EA document will be prepared in accordance with the National Environmental Policy Act (NEPA) and FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures* and *Environmental Desk Reference for Airport Actions*.

On behalf of VTrans, we are sending you this early coordination packet to solicit early comments regarding potential environmental, social, or economic issues for consideration when preparing this EA. You are asked to study the enclosed information and provide written evaluation of the potential impacts upon resources that are under your jurisdiction within 30-days of receipt of this

packet. If no reply has been received within 30-days, it will be indicated in the EA document that your agency has no comment on the project. Please send any written comments to the following address:

Attn: Taylor Koutropoulos
201 N. Illinois St.
Suite 800
Indianapolis IN, 46204

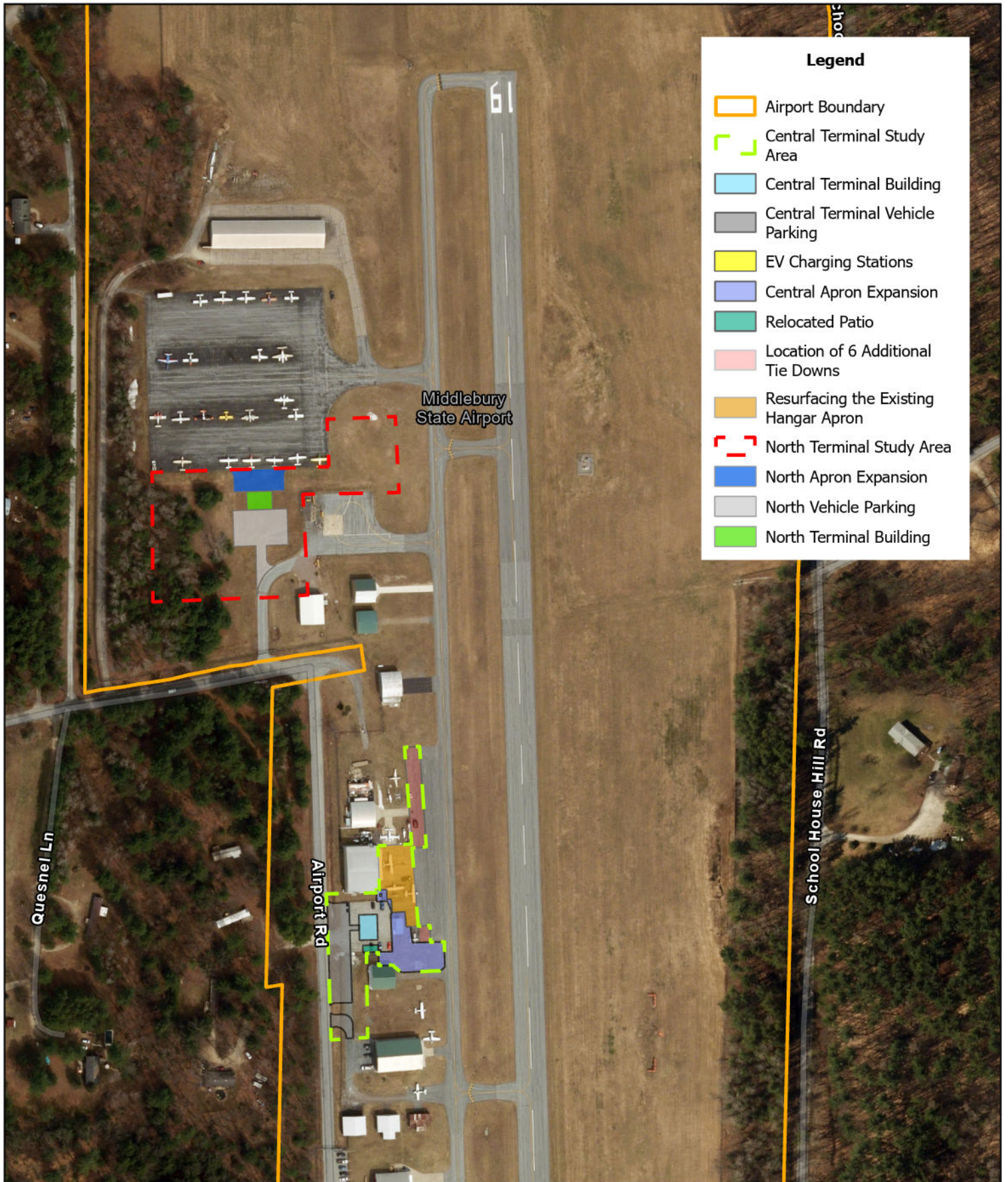
We hope the information contained herein is sufficient for you to complete your evaluation. Should you have any comments or questions, please contact me by phone at (317) 493-3321 or by email at tkoutropoulos@chasolutions.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Taylor Koutropoulos".

Taylor Koutropoulos, ENV SP
Assistant Project Manager





Legend

- Airport Boundary
- Central Terminal Study Area
- Central Terminal Building
- Central Terminal Vehicle Parking
- EV Charging Stations
- Central Apron Expansion
- Relocated Patio
- Location of 6 Additional Tie Downs
- Resurfacing the Existing Hangar Apron
- North Terminal Study Area
- North Apron Expansion
- North Vehicle Parking
- North Terminal Building

Figure 1:
Central and North Terminal Location
Middlebury State Airport
Middlebury, Vermont



1' = 250"

CHA No.
087308

Source Data
Middlebury State Airport (6B0) Master Plan

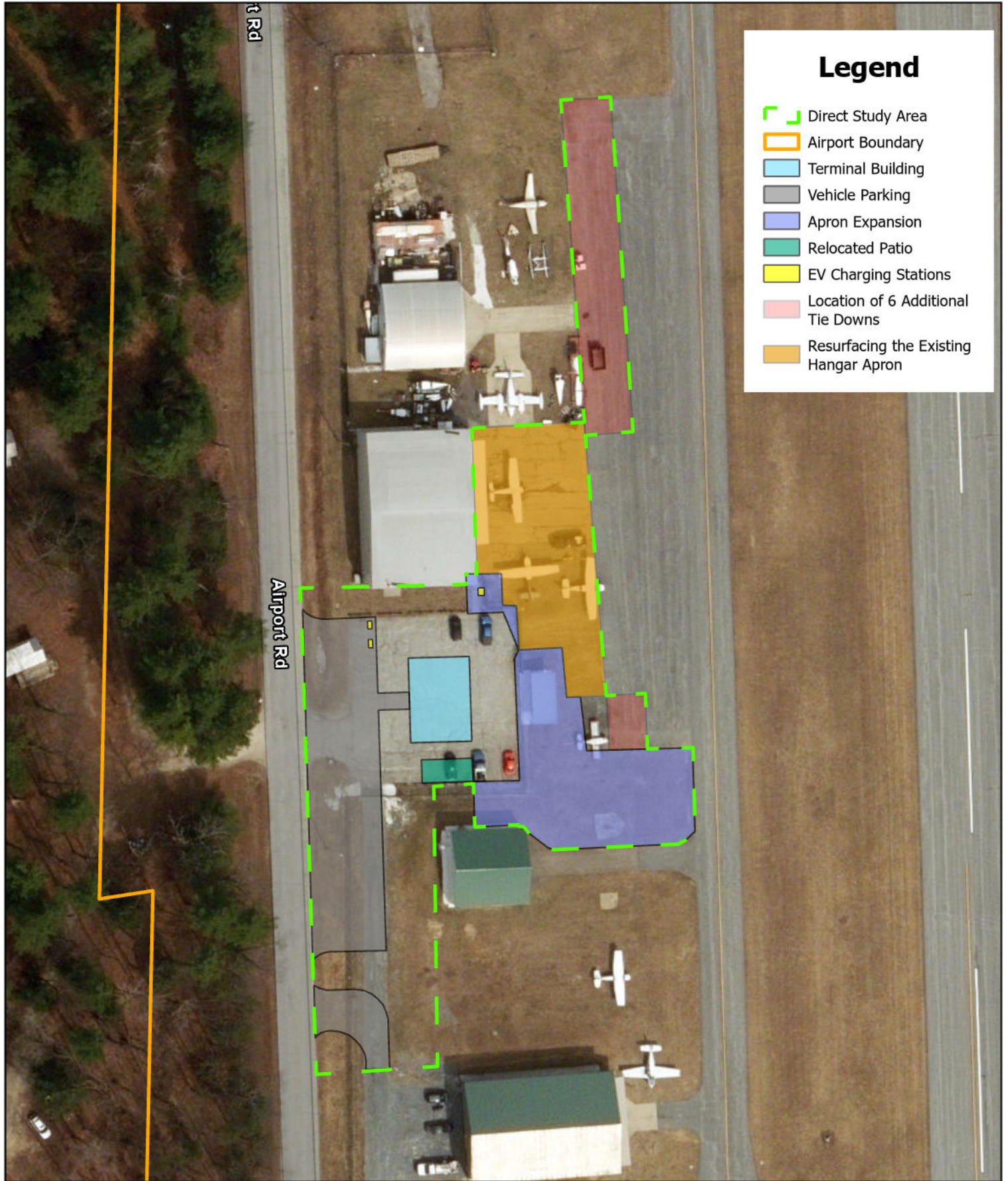


Figure 2:
Central Terminal Location
Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan



1" = 75"

CHA No.
087308

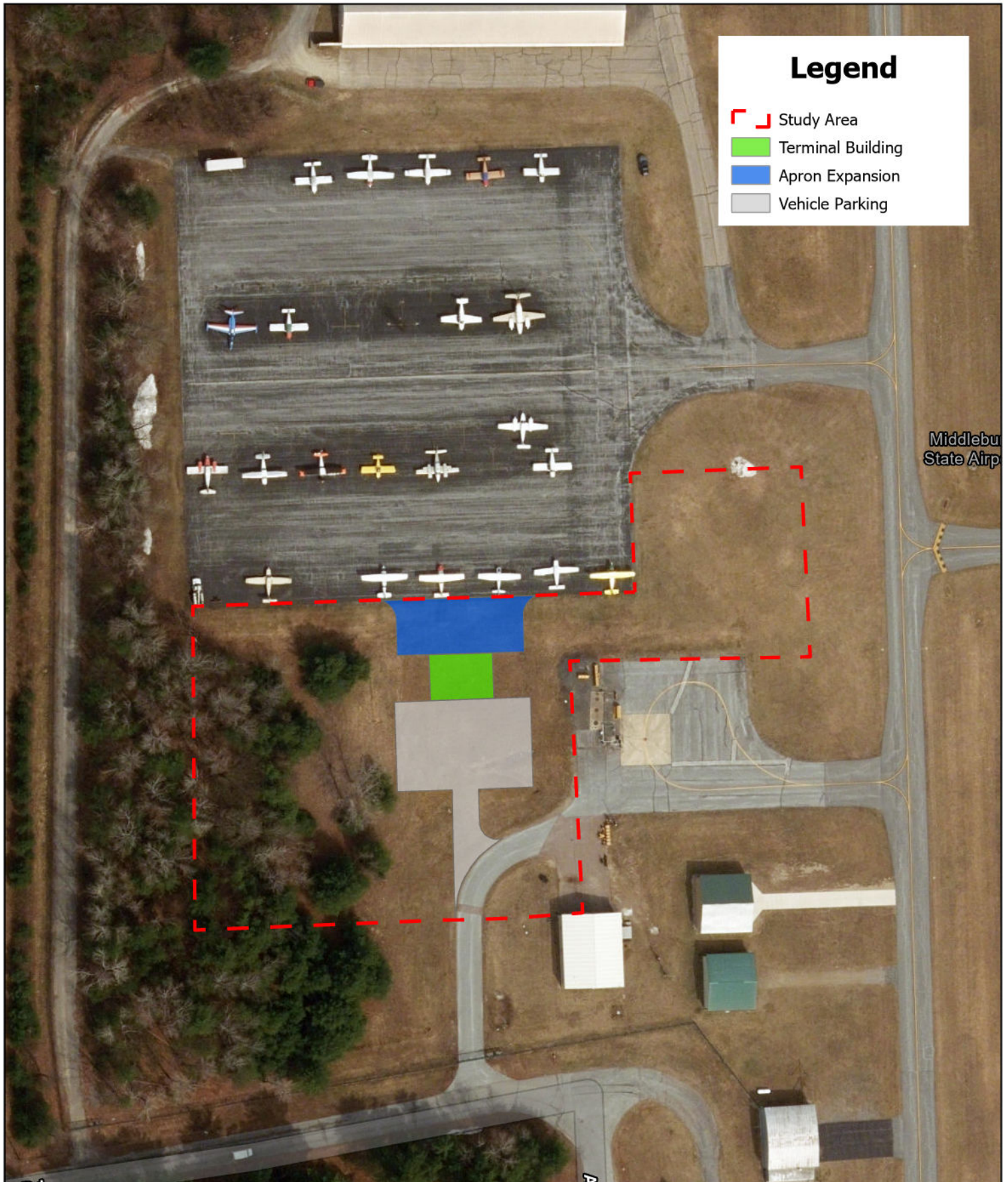


Figure 3:
North Terminal Location

Middlebury State Airport
Middlebury, Vermont

Source Data
Middlebury State Airport (6B0) Master Plan



1' = 100"

CHA No.
087308

Koutropoulos, Ashley

From: Fitzko, Danielle <Danielle.Fitzko@vermont.gov>
Sent: Tuesday, December 24, 2024 6:00 AM
To: Koutropoulos, Ashley
Cc: Heckroth, Mark; Koutropoulos, Taylor
Subject: [--EXTERNAL--]: RE: Early Agency Coordination for New Terminal Building Environmental Assessment

Hi Ashley,

Thank you for the advance notice. Our team conducted a quick review and didn't identify any FPR lands that may be involved. Is there a particular area you believe we should review further or consider for FPR interest?

Thanks,
Danny



Danielle Fitzko | Commissioner (she/her)
Vermont Agency of Natural Resources | Dept. of Forests, Parks and Recreation
1 National Life Dr, Davis Bldg. | Montpelier, VT 05620-0501
802-598-9992 cell
vtfpr.org

From: Koutropoulos, Ashley <AKoutropoulos@chasolutions.com>
Sent: Wednesday, December 18, 2024 4:01 PM
To: Fitzko, Danielle <Danielle.Fitzko@vermont.gov>
Cc: Heckroth, Mark <MHeckroth@chasolutions.com>; Koutropoulos, Taylor <TKoutropoulos@chasolutions.com>
Subject: Early Agency Coordination for New Terminal Building Environmental Assessment

You don't often get email from akoutropoulos@chasolutions.com. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Ms. Fitzko,

Please see the attached early coordination letter in reference to an Environmental Assessment at Middlebury State Airport.

Thank you.

Ashley Koutropoulos, ENV SP
Environmental Planner
CHA



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

11 Lincoln Street, Room 210
Essex Junction, Vermont 05452
January 7, 2025

Regulatory Division
File Number: NAE-2015-00817

Mr. Taylor Koutropoulos
Assistant Project Manager
CHA
201 N. Illinois Street, Suite 800
Indianapolis, IN 46204
Sent by email: tkoutropoulos@chasolutions.com

Dear Mr. Koutropoulos:

I have received your December 17, 2024 early agency coordination letter for the Vermont Agency of Transportation's proposal to construct a terminal building and associated infrastructure at the Middlebury State Airport in Middlebury, Vermont. I would like to take this opportunity to thank you for your early coordination on this project.

A permit is required under Section 404 of the Clean Water Act (33 U.S.C. 1344) for those activities involving the discharge of dredged and/or fill material, excavation, or mechanized landclearing in all waters of the United States (WOTUS), including not only navigable waters of the United States, but also inland rivers, lakes, streams and most wetlands. In interior waters, our jurisdiction under the Clean Water Act extends landward to the ordinary high water mark of a waterbody or the landward limit of most **wetlands**.

Since you have not provided any details as to any new proposed impacts to WOTUS, I cannot, at this time, make a preliminary judgment as to what type of permit, and thus how much involvement by the Corps of Engineers, would be required. The WOTUS within the entire project area need to be delineated, both in the field and on the drawings, and the precise location of where fill will be placed needs to be shown. If the project will involve new work within our jurisdiction you should forward the preliminary plan/design to me so that I may then be able to make an initial determination. This work should include the proposed terminal building and any other foreseeable construction project being proposed at the airport. Generally, my concerns would be the extent of any new impacts to waterways and/or wetlands, the availability of alternatives to minimize or avoid any of these impacts, and whether or not any historic properties would be impacted.

Please reference File No: NAE-2015-00817 when submitting additional information for this project. Again, thank you for providing the opportunity to comment at this early phase of the project. Please call me at (802) 872-2893 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Michael S. Adams". The signature is written in a cursive style with a large, stylized 'M' and a long, sweeping underline.

Michael S. Adams
Senior Project Manager
Regulatory Division

Addison County Regional Planning Commission

14 Seminary Street Middlebury, VT 05753 • www.acrpc.org • Phone: 802.388.3141

January 15, 2025

CHA Solutions
ATTN: Taylor Koutropoulos
201 N. Illinois St.
Suite 800
Indianapolis, IN 46204
Email: tkoutropoulos@chasolutions.com

Dear Mr. Koutropoulos,

We are in receipt of your letter dated December 17, 2024 requesting early agency coordination for an Environmental Assessment of the Middlebury State Airport (6B0). We understand that the proposed project includes development of an approximately 1,800 square foot terminal building, and relocation of parking and fencing with potential additional project components as outlined in the letter.

The Addison County Regional Transportation Plan “supports the safe, thoughtful expansion of the airport” with the goal of supporting economic development of the Region. The new terminal and associated project components constitute infrastructure investments necessary to allow the Middlebury Airport to function effectively, and are thus supported by our Regional Plan. We see no issues with the proposed project that would conflict with the Regional Plan.

Sincerely,



Michael Winslow
Assistant Director

Cc:

Adam Lougee, Executive Director, ACRPC
Brent Rakowski, Chair, ACRPC Transportation Advisory Committee

Addison	Bridport	Bristol	Cornwall	Ferrisburgh	Goshen	Leicester
Lincoln	Middlebury	Monkton	New Haven	Orwell	Panton	Ripton
Salisbury	Shoreham	Starksboro	Vergennes	Waltham	Weybridge	Whiting





REGION 1

BOSTON, MA 02109

January 16, 2025

The Vermont Agency of Transportation c/o
Attn: Taylor Koutropoulos
201 N. Illinois St.
Suite 800
Indianapolis IN, 46204

RE: Environmental Assessment Scoping Comments for the construction of a new terminal building at Middlebury State Airport (6B0) in Middlebury, Vermont.

Ms. Koutropoulos:

The U.S. Environmental Protection Agency (EPA) reviewed the Vermont Agency of Transportation's (VTrans) early agency coordination letter regarding the preparation of an Environmental Assessment (EA) for the proposed construction of a new terminal building at Middlebury State Airport (6B0) in Middlebury, Vermont. EPA has prepared scoping comments pursuant to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Our scoping comments are intended to help VTrans and the lead federal agency, the Federal Aviation Administration (FAA), prepare a comprehensive project EA. Our comments pertain to information about the selection of a preferred alternative and additional project components, project resilience, impacts to wetlands, waters, and associated habitat, stormwater management, meaningful public engagement, and energy efficiency in the design and operation of the proposed action.

According to the coordination letter "...[t]he project includes the development of a small single-story terminal building (approximately 1,800 square feet) and the relocation of vehicle parking and fencing." In addition to the development of a new terminal building, and based on funding and project location, the proposed action may also entail "...relocation of an existing covered patio, minor aircraft apron expansion, installation of electric vehicle (EV) charging stations for vehicles and aircraft, extension of 3-phase power service, installation of 6 additional tie downs, [and] resurfacing of an existing apron." EPA supports VTrans and FAA's intent to describe the impacts of the potential additional project components in the EA and recommends that the EA describe the decision-making process and criteria that VTrans and FAA will use to determine which location and potential additional components will be carried forth as the preferred alternative. We also recommend that the EA describe how each of the additional potential components of the proposed action meet the project purpose and need.

EPA recommends that the EA discuss projected climate related changes at the project site and how the building and potential additional project components will be designed to be resilient to these changes and extreme weather events, such as flooding, extreme storms, and heat. We note that according to EJSscreen¹--EPA's environmental justice mapping and screening tool that provides EPA with a nationally consistent dataset and approach for combining environmental and socioeconomic indicators--the project boundary is located in the 95th percentile in comparison to the U.S. with respect to flood risk.

EPA also recommends that the EA describe any potential impacts to wetlands, streams, associated upland and wetland habitat associated with each of the alternatives and how impacts will be mitigated. We recommend including information about planned long-term and construction period stormwater management on the site along with any additional construction best management practices that will be implemented. Finally, EPA encourages VTrans and FAA to apply energy efficiency and resilient design measures to the design and operation of the new airport facilities and to discuss these in the EA.

EPA encourages VTrans and FAA to conduct meaningful public engagement to seek input regarding the proposed project, alternatives, and potential mitigation. We suggest public meetings scheduled at time(s) and location(s) that are accessible to community participants, the incorporation of appropriate translation/interpretation services, the use of plain language in written materials and meeting flyers, and Americans with Disabilities Act (ADA) accessibility at public meetings.

Thank you for the opportunity to provide NEPA scoping comments for the Middlebury State Airport project. We believe the issues identified in this letter can be fully addressed by the VTrans and FAA in the NEPA process, and we are willing to work with your agency to develop a strategy to achieve that goal. Should you have any questions or wish to discuss our concerns, please contact me at (617) 918-1150 or dwyer.alexandra@epa.gov.

Sincerely,

Alexandra Dwyer
Office of Environmental Review

¹ <https://www.epa.gov/ejscreen>

Koutropoulos, Ashley

From: Donabedian, Joshua <Joshua.Donabedian@vermont.gov>
Sent: Friday, January 17, 2025 11:13 AM
To: Koutropoulos, Ashley
Cc: Koutropoulos, Taylor; Heckroth, Mark
Subject: [--EXTERNAL--]: RE: Early Agency Coordination for New Terminal Building Environmental Assessment
Attachments: Act 250 Application Guide (August 2023).pdf

Hi Ashley,

Thank you for reaching out. First, just to clarify, when it comes to Act 250 permit applications, it is an applicant's obligation to identify all issues under all applicable Act 250 criteria regarding the proposed project for the District Commission's review, not vice versa. Accordingly, here are some resources I believe you will find helpful in your evaluation of potential environmental, social, or economic issues as it relates to the proposed ±1,800 square-foot, single story public terminal building at the existing Middlebury State Airport:

- **Act 250 Application Guide.** This will help you familiarize yourself with the Act 250 permit application process in general, and the Guide also identifies all Act 250 criteria that are potentially subject to review, based upon the environmental, social, economic, etc. resources that may be implicated by any given project. See a PDF copy of the Guide attached.
- **Vermont ANR Natural Resources Atlas.** This tool will allow you to zoom onto the Middlebury State Airport property and select from an array of GIS layers that will help you achieve a better understanding of what resources may be implicated by the proposed project. Here is a link to the Atlas: <https://anrmaps.vermont.gov/websites/anra5/>.
- **Act 250 Database.** This will allow you to research the entire Act 250 permitting history for the Middlebury State Airport, as well as identify other similar and previously permitted hangar/terminal projects that may be a good point of reference and help you identify any issues/concerns that were implicated by similar projects in the past. Here is a link to the Database: <https://anrweb.vt.gov/ANR/Act250/default.aspx>. All you need to do is enter "9A0158" into the "Project Number" field and the entire Act 250 permitting history for the Airport will be displayed.

I hope this is helpful, and the District 9 Commission looks forward to reviewing the Act 250 permit amendment application for this project whenever that time may come. Thanks so much and have a great weekend.

Best,

Josh

Josh Donabedian, District Coordinator
District 6 & 9 Environmental Commissions
Vermont Land Use Review Board
111 West Street | Essex Junction, VT 05452
802-261-1945
joshua.donabedian@vermont.gov

Emails and other written or recorded information produced or acquired in the course of public agency business are public records and may be subject to public examination under Vermont's Public Records Act.

Koutropoulos, Ashley

From: Mikula, Toni <Toni.Mikula@vermont.gov>
Sent: Tuesday, February 4, 2025 8:56 AM
To: Koutropoulos, Ashley
Cc: Heckroth, Mark; Koutropoulos, Taylor; Bennett, Alyssa; Kilborn, Jillian
Subject: [--EXTERNAL--]: RE: Early Agency Coordination for New Terminal Building Environmental Assessment

Dear Ms. Koutropoulos,

As Everett said, there are a number of endangered bat occurrences in the vicinity of the airport. These are usually a concern for projects that include tree clearing or renovation/demolition of existing buildings. I don't see any of that indicated on your plans but it is a good idea to run your proposal through the IPac system if you haven't already to determine if mediation for bats will be necessary.

I see no other resources of concern in the areas of activity indicated.

From: Marshall, Everett <Everett.Marshall@vermont.gov>
Sent: Monday, February 3, 2025 4:03 PM
To: Koutropoulos, Ashley <AKoutropoulos@chasolutions.com>
Cc: Heckroth, Mark <MHeckroth@chasolutions.com>; Koutropoulos, Taylor <TKoutropoulos@chasolutions.com>; Mikula, Toni <Toni.Mikula@vermont.gov>; Bennett, Alyssa <Alyssa.Bennett@vermont.gov>; Kilborn, Jillian <Jillian.Kilborn@vermont.gov>
Subject: RE: Early Agency Coordination for New Terminal Building Environmental Assessment

Hi Ashley,

Sorry not to have responded earlier. I've copied Toni Mikula, who coordinates Act 250 projects for the Middlebury area in case the project requires an Act 250 permit. I've also copied our small mammal biologist Alyssa Bennet who oversees work on bats for our Department.

The airport is in the nearby vicinity of two federally and state endangered species Northern Long-eared Bat and Indiana Bat, and tree clearing is an FAA mandate for review. Please use the USFWS [IPac system](#) tool for review. There are two additional state endangered bats located nearby, Tri-colored Bat, proposed for federal endangered, and Little Brown Bat. I am attaching a Geodatabase with the spatial and attribute information for these bat species.

Toni or Alyssa can follow up with recommendations on the timing of tree clearing to minimize potential impacts to the endangered bat species and meet the requirements of our state endangered species law.

The airport does not have any records of state-listed bird species; but I've copied our bird biologist, Jill Kilborn, so she is aware of the project in case there are concerns that I am not aware of.

Please let me know if you need any additional information or have any questions.

Everett Marshall (he/him)
Information Mgr./Natural Heritage Coord.

Vermont Fish and Wildlife Dept.
Vermont Agency of Natural Resources
Davis 2, 1 National Life Dr | Montpelier, VT 05620-3901
802-371-7333 (cell)
<http://anr.vermont.gov/>

From: Koutropoulos, Ashley <AKoutropoulos@chasolutions.com>
Sent: Tuesday, January 21, 2025 4:36 PM
To: Marshall, Everett <Everett.Marshall@vermont.gov>
Cc: Heckroth, Mark <MHeckroth@chasolutions.com>; Koutropoulos, Taylor <TKoutropoulos@chasolutions.com>
Subject: RE: Early Agency Coordination for New Terminal Building Environmental Assessment

You don't often get email from akoutropoulos@chasolutions.com. [Learn why this is important](#)

EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.

Dear Mr. Marshall,

I am reaching out to follow up on the early coordination letter sent 12/18/2025 (attached) in reference to an Environmental Assessment at Middlebury State Airport. Please provide comments by 02/05/2025 to be reflected in the draft document.

Thank you for your attention to this matter.

Ashley Koutropoulos, ENV SP

Environmental Planner

CHA

Office: (317) 493-3334

akoutropoulos@chasolutions.com

www.chasolutions.com



Please note my email address has changed

Finding a better way.

From: Koutropoulos, Ashley
Sent: Wednesday, December 18, 2024 3:58 PM
To: Everett.marshall@vermont.gov
Cc: Heckroth, Mark <MHeckroth@chasolutions.com>; Koutropoulos, Taylor <TKoutropoulos@chasolutions.com>
Subject: Early Agency Coordination for New Terminal Building Environmental Assessment

Dear Mr. Marshall,

Please see the attached early coordination letter in reference to an Environmental Assessment at Middlebury State Airport.

Thank you.

Koutropoulos, Ashley

From: Koutropoulos, Taylor
Sent: Thursday, February 13, 2025 8:18 AM
To: jonathandirodi@greenmountainpower.com
Cc: Koutropoulos, Ashley
Subject: RE: Middlebury State Airport New Terminal Building - Agency Coordination Letter

Hey Jonathan,

Following up on my last email because I wanted to mention that you were correct when you said the Airport would prefer all underground utilities. Just thought I would let you know so that can be considered in your response.

Do you think you'll be able to provide comments by next Friday?

Thanks,

Taylor Koutropoulos, ENV SP

Environmental Planner, Assistant Project Manager

CHA

Office: (317) 493-3321 Cell: (219) 880-9871

tkoutropoulos@chasolutions.com

www.chasolutions.com



Please note my email address has changed

Finding a better way.

From: Koutropoulos, Taylor
Sent: Monday, February 3, 2025 2:58 PM
To: jonathandirodi@greenmountainpower.com
Cc: Koutropoulos, Ashley <AKoutropoulos@chasolutions.com>
Subject: Middlebury State Airport New Terminal Building - Agency Coordination Letter

Jonathan,

Just as we discussed on the phone, I've attached an early coordination letter for the construction of a new terminal building at Middlebury State Airport. Feel free to call me at the number below to discuss or you can provide your response through email.

Thank you,

Taylor Koutropoulos, ENV SP

Environmental Planner, Assistant Project Manager

CHA

Office: (317) 493-3321 Cell: (219) 880-9871



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

March 10, 2025

Regulatory Division
CENAE-RDNH/VT-62
File Number: NAE-2015-00817

Ms. Ashley Koutropoulos
Environmental Planner
CHA
201 N. Illinois Street, Suite 800
Indianapolis, IN 46204
Sent by email: akoutropoulos@chasolutions.com

Dear Ms. Koutropoulos:

We have determined that a Department of the Army regulatory permit is not required for Vermont Agency of Transportation's proposed construction of a terminal building at the Middlebury State Airport in Middlebury, Vermont. The work is shown on the attached plans, on four sheets, titled "MIDDLEBURY AIRPORT" (dated January 7, 2025) , "Central and North Terminal Location", "Central Terminal Location" and "North Terminal Location", and dated "12/17/2024".

Based on the information you have provided, we have determined that a Department of the Army permit is not required for the work described in your submittal. Corps of Engineers regulatory jurisdiction encompasses all work in or affecting navigable waters of the United States under Section 10 of the Rivers and Harbors Act of 1899 and the discharge of dredged or fill material into all waters of the United States, including adjacent wetlands, under Section 404 of the Clean Water Act. Since no work in or affecting navigable waters will occur; and no fill will be placed in waters or wetlands, a Department of the Army permit is not required.

If you have any questions regarding this letter, please contact Michael S. Adams at (802) 872-2893.

Sincerely,

Frank J. Delgiudice
Chief, NH & VT Section
Regulatory Division

Attachments

cc:

Ms. Zapata Courage, VT DEC, zapata.courage@vermont.gov
Ms. Ashley Koutropoulos, CHA, akoutropoulos@chasolutions.com



MIDDLEBURY AIRPORT

Vermont Agency of Natural Resources

vermont.gov

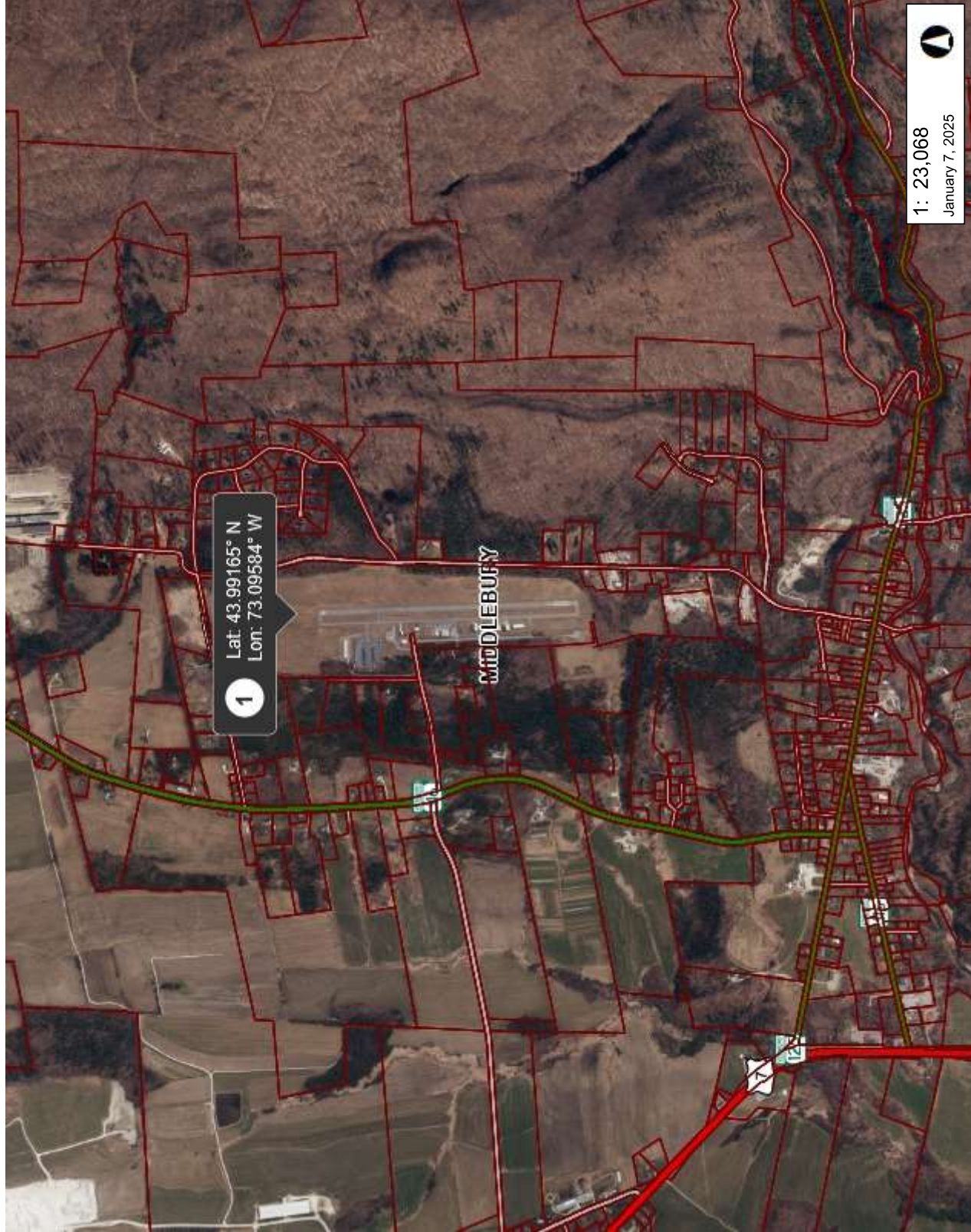


LEGEND

- Parcels (standardized)
- Roads
 - Interstate
 - US Highway; 1
 - State Highway
 - Town Highway (Class 1)
 - Town Highway (Class 2,3)
 - Town Highway (Class 4)
 - State Forest Trail
 - National Forest Trail
 - Legal Trail
 - Private Road/Driveway
 - Proposed Roads
- Town Boundary

NOTES

BY: VTtrans
AT: Middlebury State AP
Proposed terminal building and associated work
File No.: NAE-2015-00817



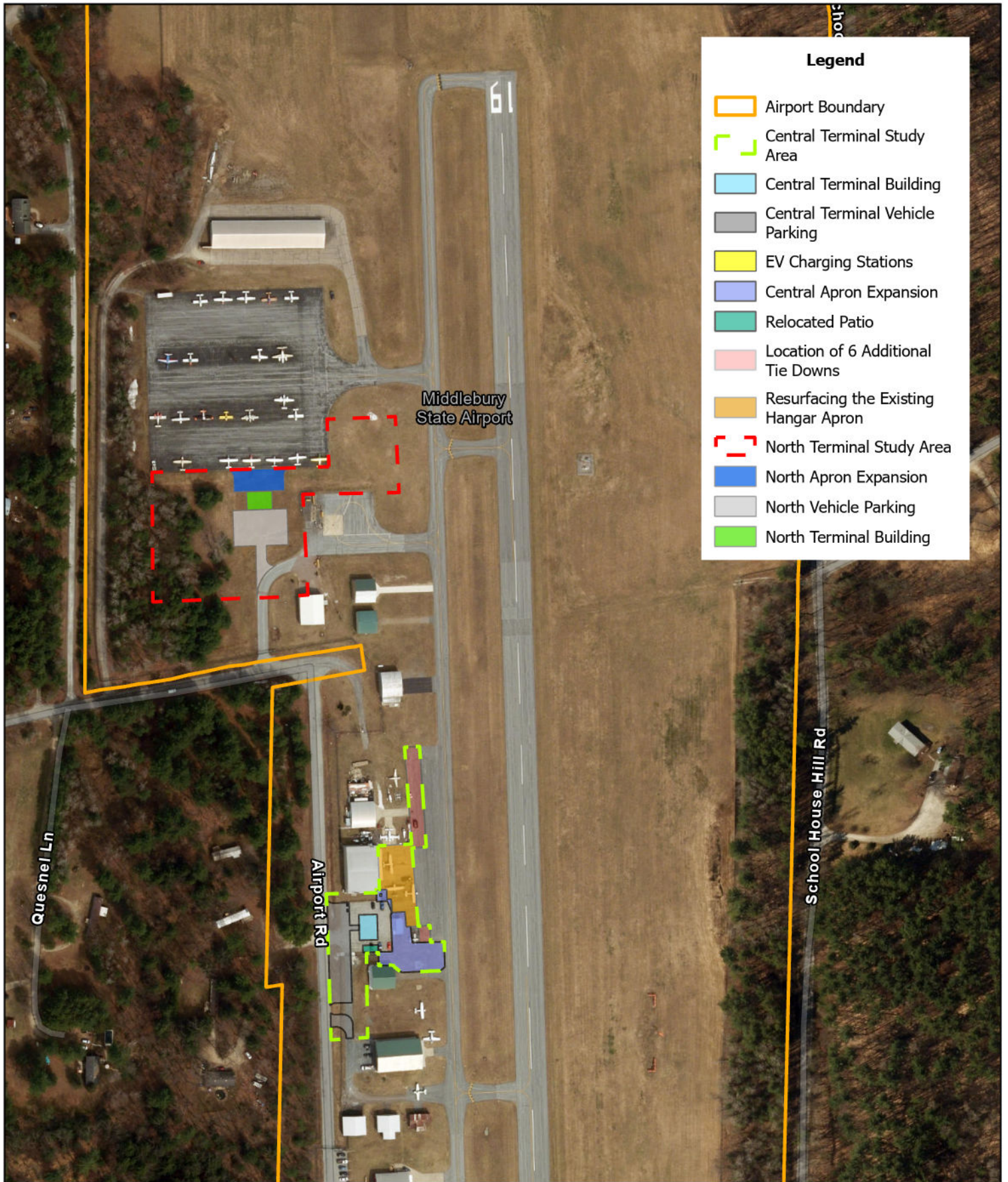
1,172.0 0 586.00 1,172.0 Meters

1" = 1922 Ft. 1cm = 231 Meters

WGS_1984_Web_Mercator_Auxiliary_Sphere
© Vermont Agency of Natural Resources

1: 23,068
January 7, 2025

DISCLAIMER: This map is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. ANR and the State of Vermont make no representations of any kind, including but not limited to, the warranties of merchantability, or fitness for a particular use, nor are any such warranties to be implied with respect to the data on this map.



Legend

Airport Boundary

Central Terminal Study Area

Central Terminal Building

Central Terminal Vehicle Parking

EV Charging Stations

Central Apron Expansion

Relocated Patio

Location of 6 Additional Tie Downs

Resurfacing the Existing Hangar Apron

North Terminal Study Area

North Apron Expansion

North Vehicle Parking

North Terminal Building

Figure 1:
Central and North Terminal Location
 Middlebury State Airport
 Middlebury, Vermont

Source Data
 Middlebury State Airport (6B0) Master Plan



1' = 250"

CHA No.
 087308

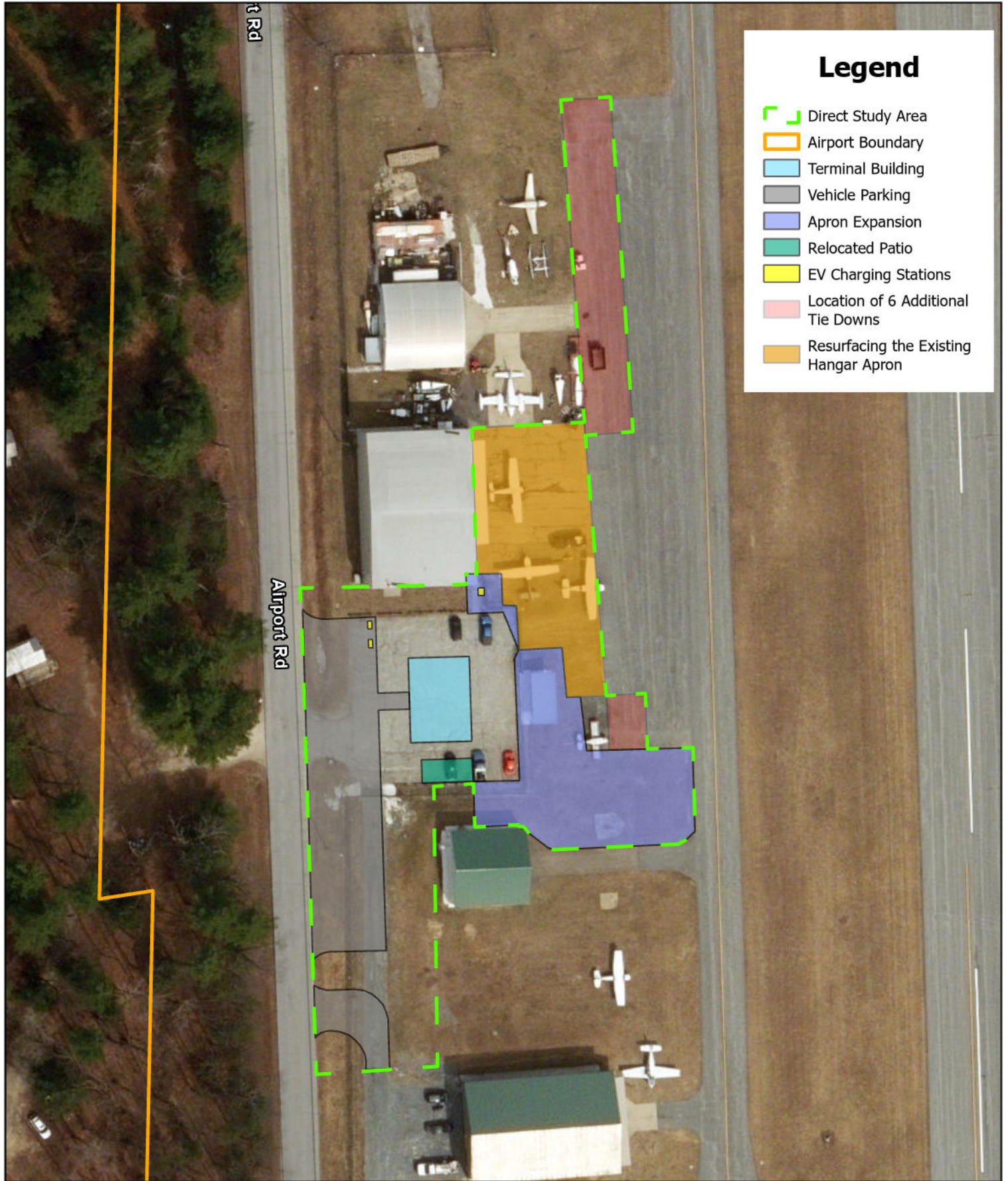


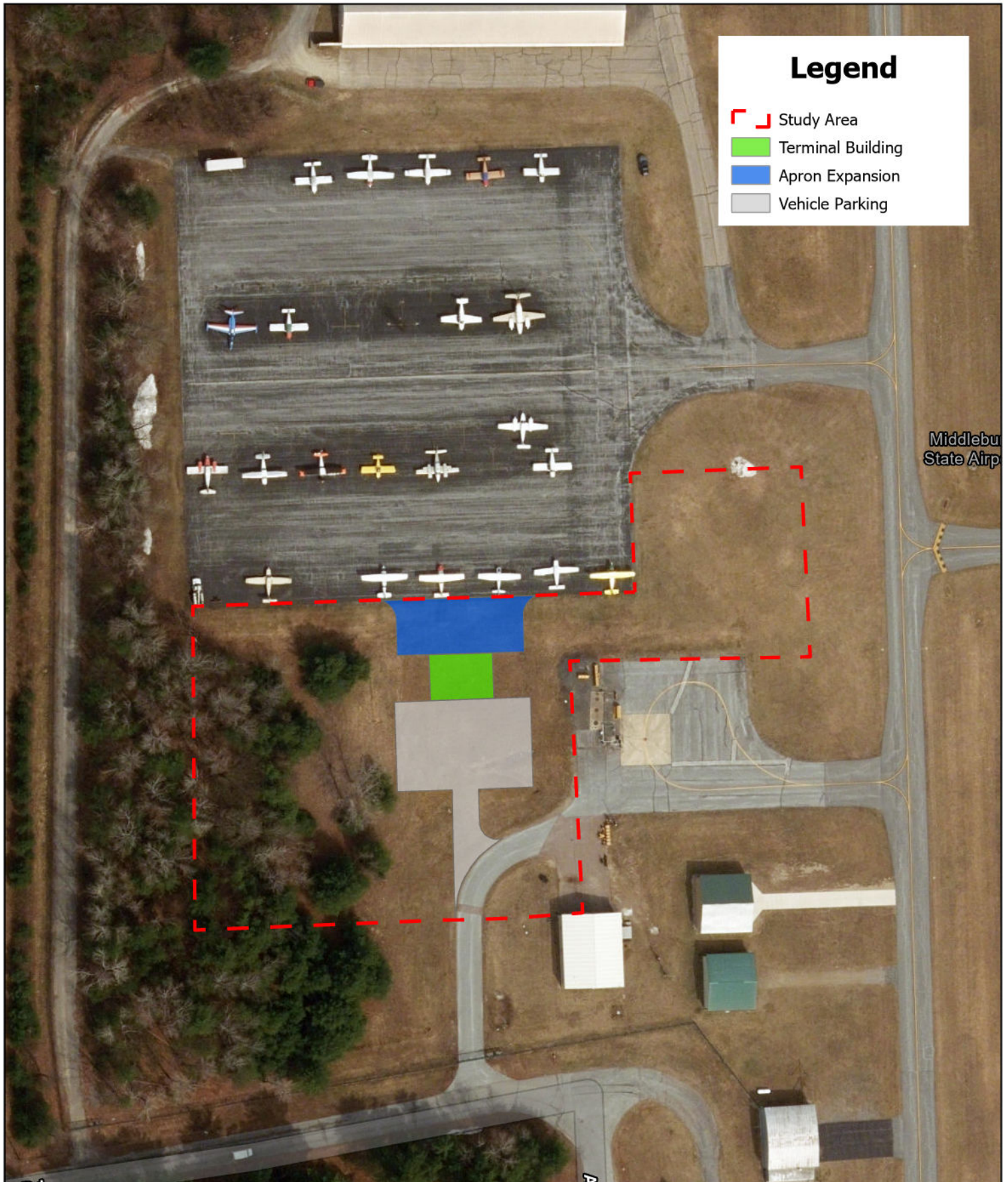
Figure 2:
Central Terminal Location
Middlebury State Airport
Middlebury, VT

Source Data
Middlebury State Airport (6B0) Master Plan



1" = 75"

CHA No.
087308



1' = 100"

CHA No.
087308

Figure 3:
North Terminal Location

Middlebury State Airport
Middlebury, Vermont

Source Data
Middlebury State Airport (6B0) Master Plan

APPENDIX D

Public Involvement

New Terminal Building Environmental Assessment



Middlebury
State Airport (6B0)

Middlebury Selectboard Presentation
February 25, 2025



February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 1

1

Today's Agenda

- Purpose of Presentation
- Environmental Assessment (EA) Process
- Project Overview
- Project Schedule



February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 2

2

What is the Purpose of this Presentation?

- **Community Engagement:**

- Learn about the EA process
- Present the Proposed Project
- Answer Questions
- Collect Input/Comments
 - Contact info on last slide

- **Public Outreach Activities:**

- 2 Meetings
 - Selectboard Meeting (today)
 - Public Hearing (summer)
 - 30-day Public Notice



February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 3

3

National Environmental Policy Act (NEPA)

- Signed into federal law in 1970
- Applies to “federal actions”, which can be projects, policies, permitting, and licensing
- What’s a federal action?
 - Approval of an Airport Layout Plan (ALP)
 - Grant funding under the Airport Improvement Program (AIP)

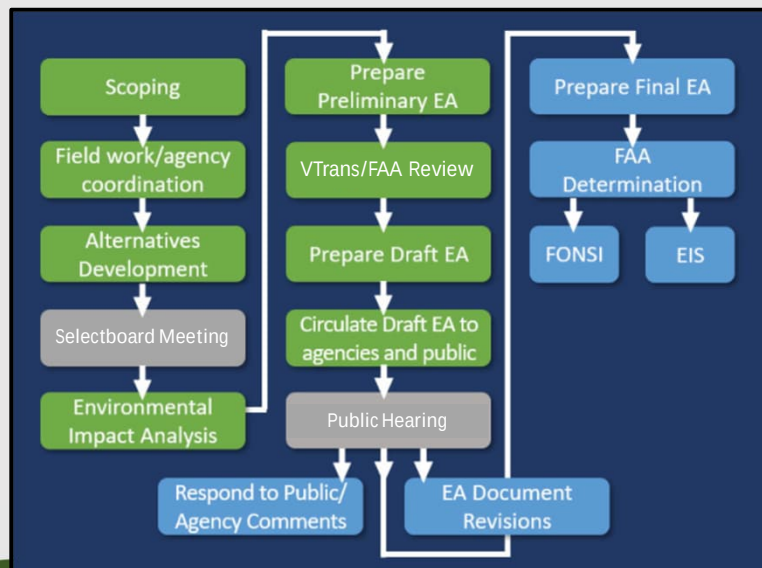


February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 4

4

What is an Environmental Assessment (EA)?



- Concise document describing a project's potential impact
- Satisfies compliance with NEPA
- Process orientated

February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 5

5

Proposed Action

Construct a New Terminal Building

- Airport does not have a Terminal Building
- Provides support space for pilots and passengers
 - Flight planning & instruction
 - Passenger waiting area
 - Pilot lounge
 - Offices/conference/management space
 - Public restrooms

February 25, 2025

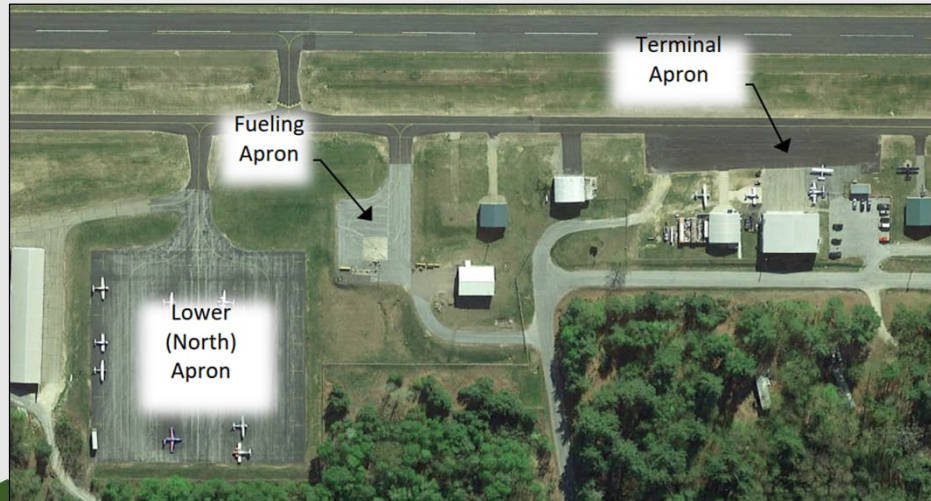
Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 6

6

Alternatives

No Build Alternative

- Required per FAA guidance
- Will be carried through the entire EA



February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 7

7

Alternatives

Northern Location

- Will be evaluated in the Alternatives Chapter
- Will not be carried through the entire EA
 - Environmental Impact
 - Constructability



8

8

Alternatives

Central Location

- Will be evaluated in the Alternatives Chapter
- Will be carried through the entire EA
 - Environmental Impact
 - Constructability



- Additional project components
 - Construct landside parking for pilots/users
 - Relocate covered patio
 - Relocate airfield fence

9

9

Proposed Action



Existing Layout



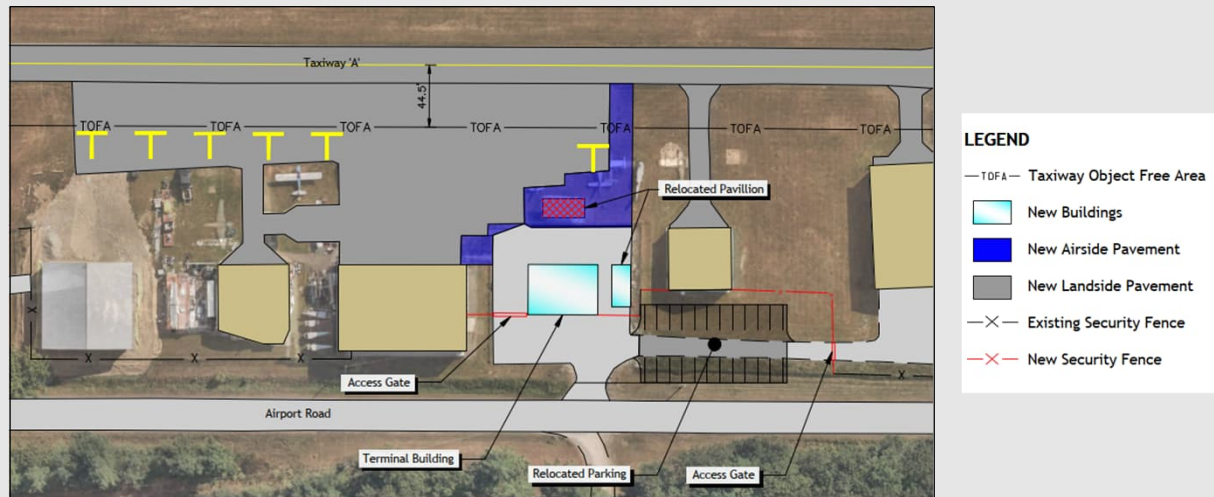
Rendering

February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 10

10

Proposed Action



February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 11

11

Terminal Building Examples



Hartness State Airport (Springfield, VT) – 1800 sq. ft.



Franklin County State Airport – 1800 sq. ft.



Morrisville-Stowe State Airport – 1400 sq. ft.

February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 12

12

Ongoing Project: Northeast Kingdom Airport Terminal Building Design



Replacement of Existing Terminal Building



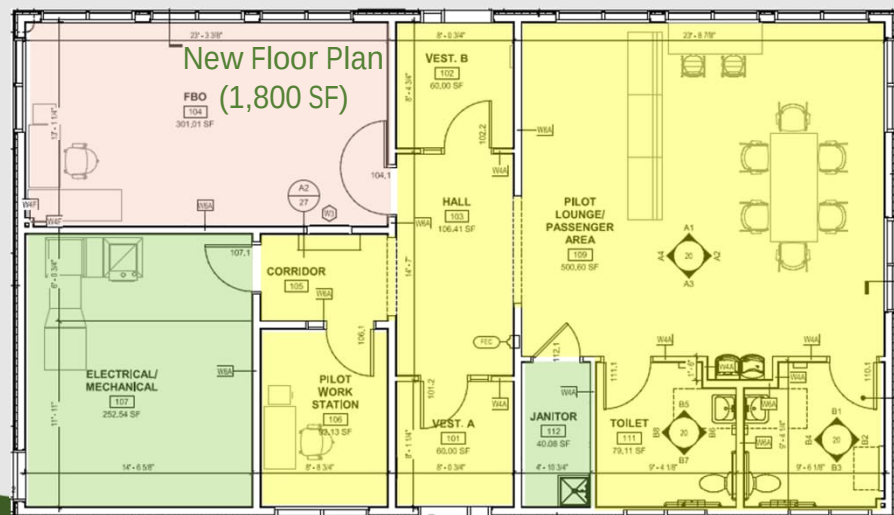
February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 13

13

Ongoing Project: Northeast Kingdom Airport Terminal Building Design

Existing Terminal Building (1,100 SF)



14

14

Proposed Action

Other Project Components: (based on funding)

- Minor aircraft apron expansion
- Resurfacing of a portion of the existing aircraft apron
- Installation of 6 tie downs
- Extension of 3-phase electric power service
- Installation of EV charging stations



February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 15

15

Environmental Resource Categories

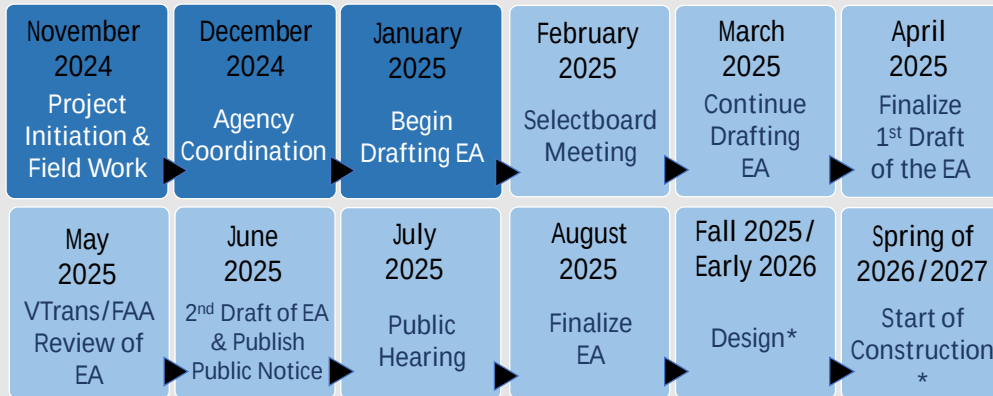
- Air Quality
- Biological Resources
 - Federal & state protected plants & animals
- Climate
- Coastal Resources
- DOT Act, Section 4(f)
- Farmlands
- Hazardous Materials
- Historic & Cultural Resources
- Land Use
- Natural Resources & Energy Supply
- Noise
- Socioeconomics & Environmental Justice
- Visual Impacts
- Water Resources
 - Wetlands
 - Floodplains
 - Surface Waters
 - Ground Water
 - Wild & Scenic Rivers

February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 16

16

Tentative Schedule



*Depends on receipt of grant funding

February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #1 17

17

Questions/Comments

**Questions or comments regarding the New Terminal Building?
Available for contact:**

John Nummy, Sr Project Manager - John.Nummy@vermont.gov



Taylor Koutropoulos, Project Manager - TKoutropoulos@chasolutions.com

Paul McDonnell, Sr Principal Planner - PMcDonnell@chasolutions.com



February 25, 2025

Middlebury State Airport (6B0) // New Terminal Building EA // Public Information Meeting #118

18

1 **Regular Selectboard Meeting**
2 **Tuesday, February 25, 2025**
3 **Meeting Minutes**

4
5 **Subject to approval by the Selectboard**

6 **NOTE: The meeting was held both remotely via video conferencing**
7 **and in person in the Town Offices Conference Room.**
8

9 Members Present: Brian Carpenter, Heather Seeley, Fred Dunnington, Andy Hooper,
10 Farhad Khan and Dan Brown. Isabel Gogarty was absent.

11
12 Staff Present: Town Manager Mark Pruhenski, Assistant Town Manager David Sophrin,
13 Director of Public Works Engineering Emmalee Cherington and Wastewater
14 Superintendent Jeremy Rathbun.

15
16 Also Present: Other interested parties.
17

18 **1. Call to Order**

19
20 The meeting was called to order at 7:00 p.m. by Chair Carpenter.
21

22 **2. Approval of Agenda**

23
24 Khan moved to approve the agenda, and Dunnington seconded the motion.
25

26 Carpenter said the list of Town Meeting speakers would be pulled from the Town
27 Manager's Report and become Item #10 on the agenda for discussion.
28

29 The agenda was approved as amended with 6 in favor, 1 absent. **MOTION PASSED.**
30

31 **3. Approval of the Consent Agenda**

32
33 Khan moved to approve the Consent Agenda, and Seeley seconded the motion. There
34 were no comments on any item, so the Consent Agenda was approved with 6 in favor, 1
35 absent. **MOTION PASSED.**
36

37 **3a - Approval of Minutes of the February 11, 2025 Selectboard Meeting**
38

39 **3b - Acceptance of Recent Selectboard Subcommittee Meeting Minutes**

- 40 • Infrastructure Committee Meeting – 2/13/2025 - Meeting Minutes (Draft)
41

42 **3c - Applications for State 1st, 2nd, & 3rd Class Liquor Licenses, Tobacco-Related Licenses,**
43 **Catering, Outside Consumption, and/or Entertainment Permits**

44 Since the last Selectboard meeting, the Town Clerk's Office has received applications
45 from **8** businesses in the Town of Middlebury, including: Middlebury Natural Foods Co-op
46 (Washington Street) - 2nd Class License; Swift House Inn (Stewart Lane) - 1st, 2nd, 3rd Class

License, Outside Consumption Permit; Two Brothers Tavern (Main Street) - 1st, 3rd Class License, Outside Consumption Permit; Maplefields (N. Pleasant Street) - 2nd Class License, Tobacco License, Sub. Tobacco License; Maplefields East Middlebury (Rt. 7) - 2nd Class License, Tobacco License, Sub. Tobacco License; Crooked Ladle (Main Street) - 1st & 3rd Class License; Mad Taco (Mill Street) - Outside Consumption Permit; Taste of India (Bakery Lane) - 1st Class License

3d - Consent Agenda Placeholder

3e - Consent Agenda Placeholder

3f - State of Vermont - Lister Appeals - Certification Form

The Town of Middlebury Assessor has submitted this form for Selectboard approval, indicating that as of this date, there are not any appeals pending relating to the 2024 Grand List.

3g - Town Manager's Report

- Vermont Public Utility Commission - Notice - Vermont Gas Systems - Amending Certificate of Public Good
- Act 250 Application - Notice - Initial Application Filing - Addison Central School District

4. Citizen Comments

Resident Anne Christie said with the increase in crime happening across the country, and as it trickles down to the local level, she asked the Selectboard how they would support and ensure an ethical response from our local law enforcement, and what is the Board's plan for potential loss of Federal funding for the police. Brown responded that the Town doesn't use any Federal funds to operate our local police other than they will apply periodically for Federal grants for specific items. Hooper said we have an excellent police force, and they take their directive from the Selectboard, Town Manager, and Chief.

South Street resident David Pistilli (via Zoom) wanted to register his dissatisfaction with Public Works and the condition of the sidewalks after this latest snowstorm. He felt it shouldn't have taken days to clear the sidewalks and indicates the de-prioritization of pedestrians over motor vehicles. He said he does appreciate the work that Public Works did during the storm in every other respect, and what they do every day. Seeley responded that Public Works was at the Infrastructure Meeting a few days prior to the storm stating they've been struggling with the sidewalk plowing equipment and pointed out we have one sidewalk plow for 18 miles of sidewalk. Carpenter told Pistilli the Board would look into it.

Ross Conrad said there are a great number of residents concerned with protecting the aquifer that supplies the town's drinking water and the concern over PFAS use at the Airport. He said a letter was sent from the Town to VTrans requesting a list of what they use, and the list they supplied was not sufficient, so in November the Town was asked to send another letter

requesting a more thorough list, and he wanted to know the status. Carpenter said he and Pruhenski are working on this letter.

Judy Wiger-Grohs handed out copies of her statements she read at the February 20th Selectboard Meeting and she requested that the statement be filed with the minutes in the Town records.

Andy Sambrook from Airport Road wanted to comment on the lack of airport communications. Carpenter said there is a new person in the job and there will be a quarterly update coming out next week. Sambrook said the communications were supposed to be monthly and the last one was in April of 2024, and he requested that there be a Selectboard member appointed as the airport representative. There was further discussion on whether there was a need for an airport representative.

Eugene Roy of School House Hill Road spoke regarding Kevin Elnicki purchasing the A. Johnson Company land behind his property. He said that parcel had been approved for a housing development years ago, and he wanted to know about permitting. Carpenter told him the Selectboard doesn't handle permits, and he'd have to ask the Development Review Board. Dunnington said there was a Selectboard agreement with A. Johnson as part of that earlier development regarding the upgrade of School House Hill Road.

A South Street resident said there were issues with the sidewalks in this storm, but there are other options and the Town should not be spending a lot of money to make sure we have "pristine" sidewalks.

5. Infrastructure Committee - Updates & Recommendations

5a. Wastewater Treatment Facility - Oxygen Sensors & Controllers – Proposed Purchase

Rathbun said this request is for four (4) new dissolved oxygen sensors and controllers at the Wastewater Plant. He said the Infrastructure Committee has recommended approval of this purchase. He said these sensors run their blowers and are needed in the treatment process and when they aren't working, they have to operate a timer and fan that isn't as efficient, and it impacts the quality of the product. He said the equipment proposed would be the same as what would be used in the future upgrade of the plant, so they will be compatible with the new equipment, and the Infrastructure Committee increased the amount needed to allow for purchase of spare parts so there is no "down time" when there are issues.

Seeley moved to approve the purchase of 4 dissolved oxygen sensors and controllers from Aqua-Aerobic Systems, Inc. for a price not to exceed \$60,000. Dunnington seconded the motion. The motion carried with 6 in favor, 1 absent. **MOTION PASSED.**

133 **5b. Engineering Proposal - New Line Skatepark Design Services**

134
135 Cherington said a Request for Qualifications (RFQ) was issued in the fall of 2024 and they
136 received responses from 8 vendors who design skateparks, and 4 of the vendors were chosen to
137 receive a Request for Proposal (RFP). She said of those 4, we received 3 RFPs and they have
138 determined that New Line Design Services are the best fit, were the most qualified, and
139 provided the services for community engagement and funding, so they are recommending the
140 contract go to New Line Design. She said this is paid jointly through the Skatepark Capital Fund,
141 and the funds from the fundraising that the Skatepark has been doing internally will be
142 transferred to the Town to pay for this design. Cherington said what she liked about New Line
143 is their incorporation of artwork into the design to deter graffiti.

144
145 Khan moved to approve the proposed engineering proposal agreement with New Line
146 Skateparks for the design of a community skatepark, at a cost of \$55,090. Dunnington
147 seconded the motion. The motion carried with 6 in favor, 1 absent. **MOTION PASSED.**

148
149 **5c. Skatepark - Land & Water Conservation Fund Grant – Recommendation**

150
151 Cherington said the Selectboard approved a pre-application for this grant in November of 2024,
152 and the Skatepark group has now been invited to submit a grant application. She said this has
153 both State and Federal review, so the grants are not actually awarded until next June, but this
154 allows for time to fundraise and complete the design, and they might apply for two different
155 phases of the project in hopes of getting funding for at least one of the phases.

156
157 Khan moved to authorize the Middlebury Skatepark to proceed with applying for the Land &
158 Water Conservation Fund Grant for an amount not to exceed \$506,250. Hooper seconded the
159 motion.

160
161 Carpenter asked Jill Quackenbush of the Middlebury Skatepark group if they were committed to
162 raising their half of these funds, and she said they were and they had a fundraising plan in
163 place. Hooper said once they have the design it is much easier to motivate people to donate.
164 Quackenbush said there were other grants they'd be applying for in the fall.

165
166 The motion carried with 6 in favor, 1 absent. **MOTION PASSED.**

167
168 Cherington informed the Board that the Town has received State Revolving Loan Funds for the
169 water tank, so we won't need to use the bond.

170
171 **6. Municipal Appointments - Town Manager Role**

172
173 Pruhenski said his predecessor served as the Town's Service Officer connecting residents with
174 social services when needed, and as Delinquent Tax Collector when action with tax bills is
175 required, so he is requesting a formal appointment by the Board tonight.

176
177 Hooper moved to appoint Mark Pruhenski to the role of Town of Middlebury Service Officer and
178 Delinquent Tax Collector positions. Brown seconded the motion. The motion carried with 6 in
179 favor, 1 absent. **MOTION PASSED.**

180
181 **7. Middlebury State Airport - Terminal Building Environmental Assessment –**
182 **VT Agency of Transportation Update**

183
184 Paul McDonnell, of CHA Solutions joined the Board, and said they were working with the
185 Vermont Agency of Transportation to do a review of the proposed small administration
186 (terminal) building at the Middlebury Airport that was recommended in the Master Plan 2 years
187 ago. He said this is an informal update of the proposal for now, and then a more formal
188 presentation will happen this summer.

189
190 McDonnell described the process involved prior to the construction of this small administrative
191 building (1,800 sq. ft.), such as looking at alternative locations, and they have chosen a location
192 approximately midway on the runway integrated with the existing hangars. He said every other
193 State airport in Vermont has terminal buildings except for Middlebury and he then showed
194 terminal buildings at other Vermont State airports and the one proposed for the Newport
195 Airport. He also described other components of the project, such as a small expansion of the
196 aircraft apron for added tie downs for aircraft.

197
198 McDonnell said the environmental assessment was happening now, and he went over the
199 categories that are included in the study, but he said at this point they are viewing this as a
200 small project with little impact, since the area they're proposing has already been previously
201 disturbed for development. He went through the schedule with a public hearing in July, with
202 design beginning in the fall and construction in the summer of 2026/2027, but the funding is
203 not in place yet.

204
205 McDonnell then took questions from the audience in regards to such things as energy sources
206 for heat/hot water, funding, and the need for the project.

207
208 **8. Town Encampment Policy - Draft (*if available*)**

209
210 Sophrin briefly went over the changes made to the draft policy based on the discussion at the
211 February 11th meeting. He said the feedback received was it needed to be less restrictive and to
212 lean more on the facts of the situation, so the language has been changed to base decisions on
213 the location of the encampment on whether there are problems or a pattern of criminal activity,
214 so the decision shifts more towards the discretion of the Town Manager rather than eliminating
215 a specific area.

216
217 The Board felt it reflected what was discussed, and Seeley said this is a living document, and
218 changes can be made as we go along. Sophrin said Chief Covey and Susan Whitmore from the

John Graham Housing Services were in support of these changes, but Heidi Lacey from the Charter House was away and had not reviewed it. Hooper said Lacey had been in favor of a more restrictive policy.

Seeley said she thought Sophrin had done a good job of incorporating the sentiments discussed at the February 11th meeting into policy changes. Sophrin said it would come back to the Board for approval on March 11th.

9. Annual Greenhouse Reduction Presentation

Dan Rafferty and Richard Hopkins of the Energy Committee joined the Board to give their annual update on the Town's greenhouse gas reduction goal of reducing the Town operations emission of carbon dioxide by 80% before the end of 2030. Rafferty said this report covers purchases made between July 1, 2023, and June 30, 2024, and will include the purchases made in the major storm in July of 2023, and these results are based on the actual receipts for fuel from the Town's financial office. He said progress has stalled, with emissions increasing in 2024, and they speculate one reason might be because there were more miles traveled due to the problems within the water/wastewater systems and the use of generators during this time. He said Public Works has the highest emissions followed by the Wastewater Department, although there was a significant decline in the use of diesel fuel at Public Works in 2023, but they aren't quite sure why.

Rafferty went over strategies to reach the 80% reduction, with such things as electrifying everything as much as possible, because he said efficiency alone won't attain the goal, and he also went over the reduction strategies implemented to date and said the most recent updates won't begin to show benefits until the FY25 report.

Hooper asked about how the high repair cost of residential heat pumps has increased the cost for residential home builders and wondered if the Energy Committee had heard about that, and Rafferty said they had not heard about that.

Carpenter said the electrification of vehicles and machinery is not what had been predicted, and he wondered what other fuel would help reach the goal, because he didn't think electrification would. Hopkins said they're suggesting every time you need to replace a piece of equipment, replace a fossil fuel device with an electric one if it's feasible. Carpenter asked what other technology is coming down the road, because electricity isn't going to do it. Hopkins said it will be lighter and higher capacity batteries, but Carpenter wasn't sure batteries were the answer. Hopkins said purchases should be put off for a few years until electric alternatives are available. Carpenter said they aren't going to be able to reach the goal with electric vehicles, and the problem with the batteries is a huge issue, and he wonders if they should relook at their goal.

Hopkins said the way to reduce carbon dioxide emissions is to stop burning fossil fuels, and we actually want to use more electricity for vehicles and less fossil fuels, and we need to be clear

that fossil fuel use is the enemy. He said he understands the skepticism, but he thinks the Town has a good chance at reaching the goal in 5 years.

Seeley said her husband experienced a gel-up this winter from biodiesel as a result of the cold weather. She said when you buy diesel at a commercial gas station where the fuel might be cut with biodiesel, there is a chance it will create this gel like substance on the filter that stops the gas flow so the vehicle won't run, and it takes a great deal of time to clean it and get the vehicle running again, so she doesn't think biodiesel is an option in this climate. Conrad said you have to use an anti-gel agent to avoid that problem. Rafferty said Public Works is in its 4th winter using biodiesel in vehicles that are not under warranty, and he has not heard of them having any problems.

10. Town Meeting 2025 Speaker List

The Board reviewed the lineup of speakers for the Town Meeting and the timing of the presentations.

11. Approval of Check Warrants

Hooper moved to approve total expenditures in the amount of \$559,293.82, consisting of \$422,146.72 for accounts payable, and \$137,147.10 for payroll, for the period of 2/12/25 through 2/25/25. Khan seconded the motion. The motion carried with 6 in favor, 1 absent.
MOTION PASSES.

12. Board Member Concerns

Brown said Mini Ilsley Library had a soft opening and he said they've done a great job and have opened a week earlier than planned. He also noted that IPJ Real Estate had four Stonecrop Meadow properties listed and one has sold, and he thought it was interesting in the price difference of the properties. He also noted that the Ilsley Library construction permit had been issued.

Dunnington said he had attended the Saturday meeting with the local Town representatives, and Amy Sheldon, who is Chair of the House Natural Resources Committee, was highly complementary of Emmalee Cherington as a leader in stormwater projects. He said Robin Scheu and Ruth Hardy wanted him to report to the Board they were very closely following the Budget Adjustment Act, particularly in regard to the appropriation for storm damage compensation that FEMA doesn't cover because we weren't in the declaration area, and they said all things that weren't covered will be covered. He said he had also asked them about what could be done at the State level to lower interest rates on bonds for these huge infrastructure projects. Dunnington also compliment staff on the Town Report, and Beth Dow for preparing the report.

Farhad Khan thanked the Public Works Department for keeping the roads clear and safe in this last snowstorm.

Seeley said the soft opening for the Mini-Ilisley was wonderful and she went again today, and they were very busy. She wanted to send a special thank you to the National Bank for allowing the library to use this space. Since this was her last meeting, she also thanked the Board.

Carpenter thanked Seeley for all her years on the Board and said she's been a great leader, she wasn't afraid to express her voice, and on numerous occasions she's made the Board re-look at something to see if it could be done better, and they would miss her.

13. Adjournment

The motion adjourned at 9:15 p.m. upon motion by Khan, seconded by Seeley.

The next meeting of the Middlebury Selectboard will be March 11, 2025, in the Town Offices.

Respectfully submitted,
Beth Dow