

# **Exhibit C**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

October 30, 2014

Mr. Gilbert Bauserman  
Maryland Airport Manager  
3900 Livingston Road  
Indian Head, MD 20640

Mr. Marcus Brundage  
Environmental Specialist  
Washington Airports District Office  
Federal Aviation Administration  
23723 Air Freight Lane, Suite 210  
Dulles, Virginia 20166

RE: Maryland Airport Supplemental Environmental Assessment, Indian Head Maryland  
October 2014

Dear Mr. Bauserman and Mr. Brundage:

The U.S. Environmental Protection Agency has received and reviewed the Supplemental Environmental Assessment (EA) for the Maryland Airport, located in Indian Head, Maryland. EPA has reviewed this project in conjunction with our responsibilities under the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council of Environmental Quality regulations implementing NEPA (40 CFR 1500-1508). This EA supplements the 2003 Maryland Airport Environmental Assessment for Capital Development. The analysis for the proposed easement acquisition and obstruction removal was not included in the original 2003 EA. According to this EA, the purpose and need for the project is to allow the airport to construct the final phase of the runway development project by acquiring easements and removing obstructions to the future approach area for Runway 20. The acquisition of 23.4 acres of off-airport property, via easements or fee-simple acquisition, will allow the airport to clear 6.5 acres of obstruction in the approach for Runway 20 on property not currently owned by the airport. An additional 2.2 acres of obstruction located on airport property also need to be removed which results in a total of 8.7 acres of on and off- airport obstruction removal. Runway 2-20 was constructed in 2013 and measures 3, 740 feet long. According to the EA, the runway was designed to be 4,300 feet long and cannot be extended without the obstruction removal.

The EA considers two alternatives including the no action alternative and the proposed action alternative. EPA recognizes that this is a supplement to an existing EA however the information provided in this document is vague and confusing. The EA should clearly state the work completed and what was evaluated in the original EA and the reason this additional area

was not included. We also have concerns about the segmentation of projects at the airport and assessment of potential secondary and cumulative impacts. Please see the enclosed technical comments.

Please provide copies of Maryland Airport's NEPA documentation to EPA in the future. We look forward to working with the Airport and Federal Aviation Administration on future projects. If you have any questions or would like to discuss our comments, the staff contact for this project is Ms. Barbara Okorn; she can be reached at 215-814-3330.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara Rudnick", written in black ink.

Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosure

**Enclosure**  
Technical Comments

- The current EA is very vague and important information is scattered throughout the document. The history of why the supplement was needed, what was evaluated in the 2003 EA, and what the scope of this EA should be clearly explained. Detailed maps and plans should be provided showing the current conditions at the airport and project area and depicting the potential impacts from the Proposed Action.
- Chapter 2- Purpose and Need - This chapter fails to identify the project needs. The EA states that “since these obstructions were not included in the original EA, it was determined that the new runway would be constructed at a shorter length until the obstructions could be removed. This runway length allows the Airport to meet the future operational needs.” The purpose and need for this supplement should be clearly explained.
- Chapter 3- Proposed Action- The discussion should provide more detail about what will be done as part of the Proposed Action. The EA only states obstructions will be removed from 6.5 acres once the easements have been purchased by the airport from the land owners. Additional information on methods of tree topping and clear cutting should be provided. Will access roads and staging areas be used? What will be allowed to grow in these areas? How often will the areas be maintained and by what methods?
- Chapter 4- Alternatives Analysis should clearly describe why the proposed project is the preferred alternative compared to other alternatives.
- Chapter 5- Affected Environment- The chapter should provide detail on the environmental and community resources for the study area.
- Chapter 6- Environmental Consequences- The chapter should clearly describe the potential impacts from the project. Figures and maps should be provided to show the locations of these areas.
  - Page 24 – The study describes the intermittent stream segment but does not provide information about potential for benthic organisms or how the intermittent status was determined. Additional discussion and evaluation should be provided for this resource and its connections. While the EA states there will be no impacts related to this project, the document fails to address potential indirect and cumulative impacts. In addition, this project is in the Mattawoman watershed which is under many stresses and significant efforts have been made to protect this resource.
  - Page 24- The discussion of species of concern is vague. The qualifications of those conducting the physical inspection of the survey area is not specified. The EA states that Maryland Department of Natural Resources (MDNR) has no concern regarding state-listed species within the boundaries of the survey area; it is unclear if this is the same as the project areas discussed in the EA. It appears the proposed project area is adjacent to a Targeted Ecological Area and is located partially in a Sensitive Species Project Area as defined by MDNR. Further documentation should be provided to ensure protection of any State-identified species of concern or habitats related to any species of concern.
  - Page 26 - discusses disposal of debris but does not mention burning. Page 2-13 states that burning may contribute to air quality impacts. There are concerns associated with the burning of materials. It is unclear what will be burned. All air emission

related to this project should be evaluated in the air quality section. This includes burning, construction vehicles, dust, etc. In addition the EA states that water will be used to suppress dust. Details should be provided to identify sources of water supply to be used.

- Page 31- Additional information should be provided for methods used in the environmental justice assessment in this study. The EA states that the proposed action will have no impact on minority populations and low-income populations, as construction will not require relocation of residences. It should be noted that there could be other potential impacts in addition to relocation and these should be evaluated in the EA. These impacts could include, noise, dust, vibration, traffic, etc.
- Page 31- The EA states that the Proposed Action is not anticipated to cause adverse impacts to Children's health and safety. Additional information should be provided justifying this conclusion.
- It is unclear if access roads and staging areas are needed for the Proposed Action. Direct and indirect impacts associated with these features should be evaluated.
- It is unclear if there will be potential indirect impacts to resources such as changes in hydrology, increased stormwater loss of shade/buffer, habitat fragmentation, etc. This should be analyzed in the EA.
- Stormwater management should be discussed in detail in this EA.
- The project should comply with EO 13112 regarding invasive species.
- The project should address EO 13508 calling on the federal agencies to work to protect and restore the Chesapeake Bay watershed.
- Chapter 7- Cumulative Impacts- This section should evaluate a longer time period and all potential projects, not only airport related projects. This assessment should look at any foreseeable projects that may impact resources (i.e. potential loss of additional forest habitat, impacts to Mattawoman Creek, etc). Projects that may be associated with the expansion of the airport (secondary impacts), business it brings or serves along with any infrastructure needs, should be assessed as well as any other foreseeable projects in the study area impacting resources (cumulative impacts). The study area for Secondary and Cumulative impacts is typically larger than the project area. This assessment is important to a complete view of potential effects on the vital natural resources in the watershed.
  - Page 37 states that the Phase IV construction of the runway, taxiway, and yard apron were reevaluated as part of the Supplemental EA and that no adverse environmental impacts will result from the completion of these three projects. This analysis should be clearly described and presented in the EA.
- Chapter 8 – Mitigation-
  - Page 38 states that precautions will be taken during maintenance and fueling of equipment so that no hazardous material are dumped onto the ground. The precautions should be discussed.
  - Page 9 states that restrictions governing the time of day in which construction activities can take place may be necessary to minimize disruptions to nearby residences. The team should work with the community and address their concerns.
  - Page 39- It is unclear if there will be mitigation for tree removal we suggest this be considered. Forest habitat provides many ecological services that should not be lost.