

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

FINDING OF NO SIGNICANT IMPACT (FONSI)

Location

Allegheny County Airport
West Mifflin, Allegheny County, Pennsylvania

Introduction

This Finding of No Significant Impact (FONSI) sets out the Federal Aviation Administration's (FAA) consideration of environmental and other factors for Airport Layout Plan (ALP) approval and federal financial assistance for the Runway 10-28 Runway Safety Area (RSA) Improvement Project at Allegheny County Airport (AGC). This FONSI is based on the *Runway 10-28 Runway Safety Area Improvement Project Environmental Assessment* (EA) submitted by the Allegheny County Airport Authority (ACAA), dated August 2022.

An RSA is a rectangular area surrounding a runway that is designed to enhance the safety of aircraft that undershoot, overrun, or otherwise leave the paved runway surface. An airport must keep the RSA cleared, graded, drained, and accessible by firefighting and rescue equipment. RSA standards and dimensions are defined by the FAA based on the type of aircraft using the airport. In situations where land is not available or if existing obstacles make a standard RSA impossible, the FAA works with the airport to find alternative solutions. FAA regularly re-evaluates standard and non-standard RSAs and requires incremental improvements as applicable. Both Runways 10-28 and 13-31 have non-standard RSAs. The rationale for the selection of Runway 10-28 as the primary focus is detailed in Chapter 2 of the Final EA.

Accidents have occurred on Runway 10-28 prior to 1998, but the first formal documentation of safety concerns was in the 1998 Airport Master Plan, which identified the deficiencies and called for RSA improvements at AGC. The first aircraft overrun occurred in 1984. A second overrun occurred in January 1998, when a jet on an executive/corporate flight in rainy, foggy conditions overran Runway 10-28 at AGC, coming to a stop at the edge of an adjacent mobile home park. The airplane and two mobile homes were destroyed by fire (there were no fatalities). Since 2001 there have been multiple site assessments and studies carried out to determine the best course of action to improve the RSAs at AGC.

The purpose of the Proposed Action is to improve the Runway 10-28 RSA to meet standards and safety requirements the extent practicable in accordance with FAA Order 5200.8, Runway Safety Area Program. The project is needed as AGC does not currently offer a runway with a standard RSA for runways serving the types of aircraft that typically access the airport. If no RSA improvements are made, then the airport will continue to be in non-compliance with FAA safety standards.

This FONSI does not include the relocation of the Medium-Intensity Approach Lighting System with Runway Alignment Indicator (MALSR), which is one of the project elements of the

Proposed Action. The relocation of the MALSR requires additional review and design. An analysis of the environmental impacts of the proposed MALSR relocation would occur in a future NEPA review.

Background

The ACAA proposes to improve the Runway 10-28 RSA as established by the Federal Aviation Administration (FAA) for runways serving the types of aircraft that typically access the airport.¹ AGC does not currently offer a runway with a standard RSA. The Proposed Action includes expanding the Runway 10 and Runway 28 RSAs with fill, installing an Engineered Material Arresting System (EMAS) at each Runway end, and widening the mid-Runway 28 RSA with fill. The need for Runway 10-28 RSA improvements was identified in the 2017 AGC Master Plan Update.²

Project Description

The Proposed Action consists of the following:

Expand the Runway 10 approach end RSA

- Install fill to extend RSA 335 feet and widen 500 feet across the new length.
- Taper from new RSA elevation to existing elevation at a 2:1 slope, which requires approximately 442,467 cubic yards of fill.
- Install a 300-foot by 150-foot EMAS bed.

Expand the Runway approach end 28 RSA

- Install fill to extend RSA 335 feet and widen 500 feet across the new length.
- Taper from new RSA elevation to existing elevation at a 2:1 slope, which requires approximately 61,239 cubic yards of fill.
- Install a 300 foot by 150-foot EMAS bed.

Expand a Portion of the mid-Runway RSA

- Install 55,000 cubic yards of fill.

Other Improvements

- Remove existing, 10-foot-wide dirt airport service roads within the fill footprint:
 - Runway 10 approach end: 1,800 linear feet
 - Runway 28 approach end: 4,370 linear feet
 - Mid-runway: 2,630 linear feet

¹ FAA, 1999. *Order 5200.8: Runway Safety Area Program*. October; FAA, 2004. *Order 5200.9, Financial Feasibility and Equivalency of Runway Safety Area Improvements and Engineered Material Arresting Systems*; FAA 2012. *Advisory Circular (AC) 150/5300-13A-Airport Design*; and FAA 2019 *Errata Sheet for AC 150/5300-13A, Airport Design, Consolidated Change 1*.

² *Allegheny County Airport 2017 Master Plan Update*. Prepared by McFarland Johnson for Allegheny County Airport Authority.

- Establish new, 10-foot-wide dirt airport service roads to reconnect existing airport service road system:
 - Runway 10 end: 1,920 linear feet
 - Runway 28 end: 460 linear feet (250 to the north, 210 to the south)
 - Mid-runway: 1,180 linear feet
- Relocate or extend groundwater monitoring wells within fill footprint at Runway 10 approach end; relocate existing utility pipeline at the Runway 28 approach end.
- Relocate airport boundary fence at both ends of the runway along fill/new service roads.
- Relocate impacted FAA navigational aids; specifically, the Runway 28 Medium-Intensity Approach Lighting System with Runway Alignment Indicator (MALSR), the Runway 10 Localizer (located at the Runway 28 end), and the Runway 10 Runway End Identification Lights (REIL), including their associated equipment shelters and/or infrastructure.
 - The relocation of the MALSR requires additional review and design. An analysis of the environmental impacts of the proposed MALSR relocation would occur in a future NEPA review.
- Modify the existing airport stormwater management system as necessary to accommodate the Proposed Action.
- Clear trees and vegetation and remove objects within the Proposed Action footprint. This includes 36 acres at the Runway 10 approach end and 48 acres at the Runway 28 approach end and mid-runway location.

Proposed Federal Action

The FAA actions involved in the implementation of the Proposed Action include the following:

- Unconditional approval of those portions of the AGC Airport Layout Plan to depict the Proposed Action pursuant to 49 U.S.C. §§ 40103(b), 44718, and 47107(a) (16), and determination and approval of the effects of this project upon the safe and efficient utilization of navigable airspace pursuant to 14 C.F.R. Parts 77 and 157 and 49 U.S.C. § 44718.
- Determinations concerning funding through the Federal grant-in-aid program authorized by the Airport and Airway Improvement Act of 1982, as amended (recodified at 49 U.S.C. §47107) (this FONSI/ROD does not determine eligibility or availability of potential funds); and
- Determination under 49 U.S.C. §§40101(d)(1) and 47105(b)(3) as to whether the Proposed Action maintains and enhances safety and security, and meets applicable design and engineering standards set forth in FAA Advisory Circulars;

The Environmental Assessment (EA) analyzed the possible environmental impacts of these proposed actions and was prepared pursuant to the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's (CEQ) implementing regulations.

Purpose and Need

The purpose of the Proposed Action is to improve the Runway 10-28 RSA to the extent practicable in accordance with FAA Order 5200.8, Runway Safety Area Program.

The Proposed Action is needed as AGC does not currently offer a runway with a standard RSA for runways serving the types of aircraft that typically access the airport. For Runway 10-28, a

standard RSA would extend 1,000 feet from the departure end of the runway, be 500 feet wide, and have no more than 3 percent slope for 200 feet off the runway end and at maximum 5 percent thereafter. The following deficiencies with the current RSA are listed below:

- RSA length deficits
 - Approximately 1,000 feet short on the Runway 10 approach end and approximately 793 feet short on the Runway 28 approach end,
- Nonstandard slope in three (3) areas of Runway 10-28
 - The area off the Runway 10 approach end has an approximately 20 percent slope
 - Mid-runway slope has a slope greater than 5 percent
 - The area off the Runway 28 approach end has an approximately 7.6 percent slope.

Alternatives

There were six (6) alternatives that were considered and they are listed below.

1. Improve Other Runways at AGC
 - This alternative considered improving Runway 13-31 and downgrading Runway 10-28 so fewer aircraft are exposed to risks associated with the Runway 10-28 non-standard RSA. Runway 13-31 would become the primary instrument runway at AGC (shifting service from Runway 10-28). Runway 13-31 would be widened and extended 2,676 feet and a parallel taxiway would be constructed.
2. Use of Declared Distances
 - Declared distances are specific operational lengths designated at a given airport that augment takeoff and landing distances for various reasons including RSA deficiencies. Where the reduction of usable runway length is necessary, airports can designate a displaced threshold, which marks the beginning of usable runway for landing purposes. A displaced threshold may also be used to indicate the end of usable runway for takeoff calculations, pending safety factors.
3. Modify Runway 10-28
 - Modifications such as relocation, shift, realignment, or reduction of Runway 10-28 were considered. There is no available land at AGC to relocate Runway 10-28, and any shift or realignment would encounter the same RSA constraints that exist for the current configuration (landfill, highway/railroad, residences, slope, dropoff, etc.) as well as encroach on contributing elements to the National Register of Historic Places Historic District designation at AGC.
4. Fill Runway 10-28 Safety Area
 - **Fill Entire Standard RSA.** This alternative (500 feet wide for 1,000 feet at each runway end) is constrained beyond the Runway 10 end by the location of the landfill (i.e., extending a 500-foot RSA for a full 1,000 feet would require fill be placed on top of the existing landfill). In addition, there is an area of existing deficient nonstandard grading that runs parallel to the northside of the Runway 10 end. This area begins immediately north of the Runway 10 end and runs east approximately 980 feet. This area is approximately 40 feet wide from the RSA boundary (approximately 65 feet from the Airport property line) and has a sloped drop of approximately 40 feet in elevation. Correcting this area of deficient nonstandard grading would require construction of an approximately 980-foot long by 40-foot-high retaining wall.

- **Fill to Property Line.** The airport property at the Runway 10 end could accommodate a 1,000-foot by 500-foot RSA; however, to keep the entire project within airport boundaries would require an extensive, 3,165-foot long by 170-foot-high retaining wall and extension of the existing Lebanon Road tunnel. At the Runway 28 end, the RSA would be 500 feet wide for 485 feet and partial width for 515 feet. This alternative would construct an 880-linear foot, 20-foot-high retaining wall along Lebanon Church Road and require the acquisition of three residential properties at the Runway 28 end (3 acres).
5. Installation of EMAS
 - Installing an EMAS bed at each end of the runway would slow down aircraft that overrun the runway more quickly; therefore, the RSA does not need to be as long. The EMAS proposed at the Runway 10-28 ends would be 300 feet long and 150 feet wide off the end of the existing pavement. Fill will still be required to construct the EMAS due to the steep slopes at both runway ends; however, most of the fill can be placed at approximately a 2:1 slope.
 6. No Action Alternative
 - Under the No Action Alternative, the Proposed Action would not be built, including clearing; the placement, compaction, and grading of fill; and EMAS construction. All existing RSAs at AGC would continue to be non-standard and aircraft that overrun the runway would be at greater risk for damage and injury.

The installation of EMAS at both ends of Runway 10-28 was identified as the Preferred Alternative for the Proposed Action. This Alternative meets the purpose and need in an operationally efficient manner with no encroachment into adjacent land uses, no apparent significant environmental or operational impacts, and is more economic than other alternatives. For reasons described in greater detail in sections 1.4.1 and 2.2.5 of the EA, only the Proposed Action and No Action alternatives were carried forward for full analysis within the Final Environmental Assessment (EA).

Discussion

The August 2022 EA addresses the effects of the Proposed Action on the quality of the human and natural environment, and is made a part of this Finding. The environmental impact categories of Coastal Resources, Section 4(f), Farmlands, and Wild and Scenic Rivers were not relevant to the Proposed Action due to their absence within the study area and no further analysis was conducted.

The Final EA examined the following environmental impact categories: Air Quality; Biological Resources; Climate; Hazardous Materials and Waste, Solid Waste, Pollution Prevention, and Contaminated Sites; Historic, Architectural, Archaeological and Cultural Resources; Land Use; Natural Resources and Energy Supply; Noise and Noise-Compatible Land Use; Socioeconomics, Environmental Justice and Children's Environmental Health and Safety Risks; Visual Effects; Water Resources; and Cumulative Impacts.

The following provides a summary of the analysis of various resource categories, which are described in greater detail in Chapter 3 of the Final EA.

Air Quality

AGC is located in Allegheny County which is within a nonattainment area for three criteria pollutants: ozone, sulfur dioxide, and particulate matter of less than 2.5 micron diameter (PM_{2.5}) (2012 standard). The Pittsburgh-Beaver Valley area, which includes the entirety of Allegheny County and AGC, is designated as being in marginal nonattainment for the 8-Hour Ozone (2008) standard.

Parts of Allegheny County, including the Borough of West Mifflin and AGC, are designated as being in nonattainment for sulfur dioxide. Allegheny County is designated as being in moderate nonattainment for the most recent PM_{2.5} standard (2012). There are areas of Allegheny County that are currently designated as being in maintenance for both carbon monoxide and particulate matter of less than 10 micron diameter (PM₁₀), but the Borough of West Mifflin is found to be in attainment for both of these pollutants. The Borough of West Mifflin is not classified as being in maintenance for any of the remaining criteria pollutants.

An emissions inventory was conducted for the Preferred Alternative, and demonstrated that it would not cause exceedances of de minimis thresholds for any criteria pollutants. Thus, the Preferred Alternative is not anticipated to result in significant impacts on air quality at the airport.

As of January 1, 2021, Allegheny County adopted a “clean construction” ordinance requiring ultra-low sulfur diesel fuel in certain vehicles and equipment and installation of Best Available Retrofit Technology (BART) as applicable. The ordinance also prevents contractors from operating any applicable equipment that has not received the BART upgrade. Construction of the Proposed Action would be subject to this ordinance as well. In addition, other measures to further reduce emissions from construction activities and fugitive dust will be implemented and discussed in the mitigation section of this FONSI.

Biological Resources

Although most of the construction activity would occur in portions of the Airport that have been disturbed and graded in the past and are subject to ongoing human presence and noise disturbance from airport, road, and other adjacent industrial activities, there will be a loss of approximately 5.92 acres of forested cover. The forested portions of the Proposed Action area are mostly dominated by healthy mature canopy trees, such as maples, oaks, and cherries. The underbrush of these forested areas is typical of disturbed land and contains dense patches of noxious invasive species, such as blackberry bushes, multiflora rose, and Japanese honeysuckle. The forested cover is not considered high quality vegetative land cover. Once cleared, the slopes would be revegetated with a weed free seed mix designed specifically to avoid attracting wildlife.

Coordination with the Pennsylvania Department of Conservation & Natural resources via their Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review tool, indicated that two federally-listed species: Indiana Bat (endangered) and northern long-eared bat (threatened) were listed on the Allegheny County Comprehensive Species Inventory. However, records indicated no known impacts to threatened and endangered species and/or special concern species and

resources within the area of the Proposed Action area. Therefore, based on the information provided, no further coordination was required with jurisdictional agencies.

Although the Proposed Action would not have significant impacts to biological resources and mitigation is not required, the airport and its construction contractors will employ additional voluntary measures such as timing restriction that would be protective of onsite and adjacent ecosystems. These measures will be discussed in the mitigation section of this FONSI.

Climate

The Preferred Alternative would result in a temporary increase in greenhouse gas emissions associated with construction activities. The Proposed Action is estimated to contribute 40,431 tons of CO₂e. For comparison, the City of Pittsburgh contributed approximately 4.8 million tons in 2013 and West Mifflin Borough contributed 985,809 tons in 2018. The entirety of the state of Pennsylvania contributed 269.1 million metric tons (296.6 short tons) in 2018. This information is presented for informational purposes only, to provide context for the overall contribution of the Proposed Action to an issue that is global in scale. There are currently no federal requirements for reporting greenhouse gases from aviation sources and no significance thresholds. However, the recommendation to use alternative fuels or electricity when possible will be incorporated into the project.

Hazardous Materials and Waste, Solid Waste, Pollution Prevention, and Contaminated Sites

The Proposed Action would not violate any laws or regulations and adherence to all federal, state, and local laws would be maintained during construction and operation. In addition, the Proposed Action would deliberately avoid encroaching upon the boundary of the U.S. Steel STEP Hazardous Waste Landfill at the Runway 10 end. Existing infrastructure supporting the landfill (i.e., pipeline and monitoring wells) would be relocated before construction and any contaminated sites and associated infrastructure would be avoided during construction. No impacts to the landfill or land use controls would occur. The Proposed Action would also not use or generate significant volumes of hazardous materials or create new waste streams. Therefore, no significant environmental impacts are anticipated to result from the Proposed Action.

Historical, Architectural, Archeological, and Cultural Resources

A Programmatic Agreement made between ACAA, FAA, the Pennsylvania State Historic Preservation Office (PA-SHPO), and interested Tribal Historic Preservation Offices in July 2008 (amended February 2021) identifies 280 acres of the 432-acre Airport property as a National Register-eligible Historic District, encompassing airport buildings, structures, and runways. The 2021 Programmatic Agreement Amendment states that improvement to the Runway 10-28 RSA can proceed without National Historic Preservation Act Section 106 consultation. The 2008 Programmatic Agreement also notes that, to develop the airport, most of AGC property was cut, filled, and graded. Hilltops were removed in excess of 20 to 30 feet and the peripheries of the property were filled in excess of 30 feet, essentially eliminating the potential for finding prehistoric archaeological resources over most of the property.

Even though there is a Programmatic Agreement in place, the FAA requested that consultation with the PA-SHPO still occur. In addition, outreach to American Indian tribes with interest in

this region was initiated and was ongoing during the NEPA process. The Proposed Action will have no effect on historic, architectural, archaeological, and cultural resources within the APE. Therefore, the Proposed Action is not expected to exceed any threshold indicating a significant impact.

Land Use

The Proposed Action is consistent with local, state, and federal plans and objectives, and no uses have been identified within or outside of airport property that would be incompatible or otherwise degrade airport services or safety. The proposed EMAS system would improve safety infrastructure, thus conferring a positive impact to surrounding land uses by compensating for the full length of the RSA, especially at the Runway 28 approach end where incompatible land uses occur within the existing RSA

The improvements would all occur on AGC property and would not result in discontinuation of any off-airport activities. No adverse impacts to land uses around the Proposed Action areas are anticipated.

Natural Resources and Energy Supply

The Proposed Action is unlikely to result in more than a minimal relative increase in demand on natural resources or energy supply, and all natural resource demands would be associated with project construction and temporary in nature. Water, fill material, and the provision of utility services, such as gas and electricity, are all generally available in Western Pennsylvania, and the temporary minor increase in demand associated with the project construction would not exceed local supplies. Accordingly, no significant impacts to natural resources or energy supplies are anticipated.

Noise and Noise-Compatible Land Use

Construction activities associated with the Proposed Action would result in a temporary increase in ambient noise levels in the immediate vicinity of work areas on the Airport property, the surrounding areas, and on the haul routes used by construction equipment and dump trucks carrying fill material to the Proposed Action site. It is anticipated that the greatest noise increase would occur during site clearing, fill, and grading, but there would also be temporary noise associated with the installation of the EMAS beds beyond both runway ends. Some construction equipment would generate noise levels of approximately 85 dB as measured at 50 feet. For a listing of anticipated noise associated with construction equipment, please refer to Table 3.9 1 of the Final EA.

Given the type of construction associated with the Proposed Action and the distance from construction areas to noise-sensitive land uses, no significant construction noise impacts would occur. Due to attenuation and the existing industrial character of the Proposed Action area, temporary, intermittent noise from construction activities is not likely to be perceived by or distracting to nearby noise receptors.

Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks

The FAA has not established significance thresholds for socioeconomics, environmental justice, or children's environmental health or safety risks. The FAA has identified factors to consider in determining whether a Proposed Action would result in a significant socioeconomic impact. Because the Proposed Action would not produce substantial economic growth in undeveloped areas, disruption of the physical arrangement of established communities, extensive relocation of residents without available sufficient relocation housing, relocation of businesses that would create severe economic hardship, a substantial loss in community tax base, or a substantial degradation of level of service on area roadways, the Proposed Action would not result in a significant socioeconomic impact.

While the FAA has not identified a significant impact threshold for environmental justice, it has been established that an impact may occur if a Proposed Action would cause a disproportionate and adverse effect on low-income or minority populations.

The Final EA identified that construction activities associated with the Proposed Action would be subject to local noise ordinances which stipulate, "between 10 p.m. and 7 a.m. noise in excess of 55 dB cannot enter a residential community." This would include environmental justice communities located adjacent to the truck routes. However, truck haul traffic would be required to adhere to designated routes to minimize potentially adverse effects. These routes pass by both communities identified as environmental justice communities as well as communities not identified as environmental justice communities with similar effect. Furthermore, the Final EA indicates the closest residential noise receptor to the Proposed Action site would be exposed to noise levels of only approximately 45 dB, and construction activity-related noise at this level is not anticipated to negatively impact surrounding communities. There is no indication any disproportionately high or adverse effects would be experienced by environmental justice communities in the vicinity of the Proposed Action. Therefore, the temporary effects of Proposed Action construction would not be concentrated in environmental justice communities and would not result in disproportionately high and adverse effects to these communities.

As discussed in FAA Order 1050.1F, while no significance threshold has been established for identifying significant impacts related to children's environmental health and safety risks, the factor to consider in determining whether there is a significant impact is whether a Proposed Action would have the potential to lead to a disproportionate health or safety risk to children. As previously discussed, there are no schools, parks, or other locations where children would spend time located within close proximity to AGC and the airport is fenced with controlled access. As stated in Sections 3.2 and 3.9 of the Final EA, the Proposed Action would not result in any significant air quality or noise impacts that might affect the health of children. Furthermore, as discussed in Section 3.5 of the Final EA, there is no potential for release of identified or heretofore undiscovered hazardous materials that would be harmful to children. Accordingly, the Proposed Action would not produce significant children's environmental health or safety risk impacts.

Visual Effects

The Proposed Action is unlikely to introduce new light sources to cause annoyance or effect the visual character of the area. There would be no new physical development that would introduce new fixed light sources to the Airport, and light sources associated with construction would be unlikely as most activities would be confined to daylight hours. If nighttime construction operations were to occur and additional night lighting were required, because of the distance between the nearest residential development and the Airport, the degree of vegetation along the Airport boundaries, and the Airport's location on a hilltop, it is not likely that light emissions would be perceived by sensitive receptors (i.e., adjacent residential communities).

As a result, it is believed that the Proposed Action would not cause any significant visual effects to the visual environment of AGC or surrounding areas.

Water Resources (Wetlands, Floodplains, Surface Water, Groundwater)

Wetlands

One palustrine emergent wetland (identified as WET-1), approximately 0.06 acres in size, was located approximately 70 feet west of the proposed maximum fill area at the Runway 10 end (Figure 3.12-2 of the Final EA). No impacts are anticipated. Given the proximity to the proposed maximum fill area, coordination with PA DEP and the USACE will occur during the permitting process.

Floodplains

AGC was constructed on top of a hill. Per the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps for the Proposed Action location, the Proposed Action area is not located within or adjacent to any floodplains, and the nearest stream is Streets Run, approximately 0.6 miles from the Runway 10 RSA construction area (Appendix H of the Final EA). Thus, no impacts to floodplains are anticipated and floodplains were eliminated from further analysis.

Surface Waters

A total of 1,531 linear feet of natural channel at the Runway 10 approach end are within the Proposed Action area; however, no natural stream segments are identified within any of the Proposed Action footprint/fill areas and a minimum 50-foot setback will be enforced between existing streams and areas of ground disturbance (Table 3.12-2 of the Final EA).

All water resources within the Proposed Action footprint/fill areas were identified as other surface waters (OSWs). The OSWs are not likely to be claimed as waters of the U.S. since they are stormwater control features constructed or excavated in upland or in non-jurisdictional waters to convey, treat, infiltrate, or store stormwater run-off. As such, a permit from the USACE should not be required for relocation of these features. OSW channels that cannot be avoided will be re-routed/re-established around the fill area or as appropriate to drain the newly established slopes as determined during final project design.

In response to written comments received by the USEPA for this project (see Appendix I of the Final EA, sections I-4.6.5 - Response 01-05 and I-4.6.6 - Response 01-06), the ACAA will request that the USACE complete a jurisdictional determination for Channels 2, 9, 10, and 11

characterized as “other surface waters” that will be directly impacted by the Proposed Action as identified in Table 3.12.-2. For purposes of this analysis, it is assumed that these resources are subject to regulatory jurisdiction under Section 404 of the Clean Water Act (33 U.S.C. § 1344) or Section 9 or 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 401 et seq.) However, because the area in question represents approximately 868 lineal feet of surface waters and because the total length is less than 1,000 feet, the Proposed Action would qualify for inclusion under the Army Corps of Engineer’s existing Section 404 Nationwide Permit. The Nationwide Permit streamlines the permitting process for specific types of projects with minimal potential to impact aquatic environments.

Implementation of erosion control best management practices and pollution prevention measures would minimize the potential for substantial water quality impacts during construction. The Proposed Action would include modification to the airport’s existing stormwater management system to accommodate the project and any potential increased amount of runoff after construction is complete. Given the use of project-specific erosion control and pollution prevention measures it is expected that water quality standards would not be exceeded. Therefore, the Proposed Action is not expected to exceed thresholds indicating a significant impact.

Ground Water

Although the compaction of fill and establishment of compacted slopes over existing elevations may alter surface water contribution and thus the volume and direction of flow of superficial or perched groundwater, it is not expected that the Proposed Action will substantively impact groundwater. The Proposed Action will not impact public water supply. Therefore, the Proposed Action is not expected to exceed thresholds indicating a significant impact for these resources.

Construction Impacts

Construction impacts would be local in nature and temporary. Use of best management practices (BMPs), timing restrictions, and permitting will ensure there are no significant impacts.

Cumulative Impacts

Cumulatively, the past and proposed projects for the airport are not anticipated to cause a significant impact to the environment with the incorporation of minimization measures and use of BMPs.

Public Involvement

An early project announcement fact sheet describing the purpose and need for RSA improvements and the intent to evaluate alternatives to improve the RSA was placed on the ACA website in May 2021

Early coordination letters describing the purpose and need for RSA improvements and the intent to evaluate alternatives to improve the RSA were sent to potentially interested resource agencies, tribes, and other stakeholders in July – November 2021 (Appendix I of the Final EA). Recommendations were received from USEPA, the U.S. Natural Resource Conservation Service, and Pennsylvania DCNR and incorporated into the analysis given in Chapter 3 of the Final EA.

A Notice of Availability of the Draft EA and Notice of Public Hearing was published in the Pittsburgh Post-Gazette and Pittsburgh Courier newspapers on February 27, 2022, and March 2, 2022, respectively (Appendix I). The Notice and a PDF of the Draft EA were placed on the AGC website. Hardcopies of the Draft EA were made available for public review at the airport by appointment only.

The Draft EA was made available for review by the public, government agencies, and interested parties for a 36-day review period beginning on February 27, 2022. On March 31, 2022, it was noted that the Draft EA published on the ACAA website was missing appendices. An updated version was published to the ACAA website and the public comment period was extended by 30 days. The public comment period concluded at 5:00 p.m. on May 2, 2022. A total of three letters, broken down into 11 individual comments on the Draft EA, were received by AGC. Copies of the letters, as well as the responses to the individual comments, are provided in Appendix I of the Final EA

A virtual Public Workshop was held on March 29, 2022, from 6:00 p.m. to 7:00 p.m., followed by a virtual Public Hearing beginning at 7:00 p.m. (Appendix I of the Final EA). During the virtual Public Workshop, representatives of the Airport and the Study Team provided a brief presentation on the Proposed Action and its environmental impacts and answered questions from the Workshop participants. No verbal comments were given at the Hearing.

Permits

Pennsylvania Department of Environmental Protection, General NPDES Permit
Army Corps of Engineers, Section 404 Nationwide Permit

Mitigation Measures

Mitigation measures to be undertaken as part of the Proposed Action to improve the Runway 10-28 RSA at the AGC include:

Air Quality

- Curtailing construction activities during periods of high wind conditions.
- Reducing exposed erodible surface area through appropriate materials and equipment staging procedures; stabilizing stock-piles of raw materials and other temporarily disturbed areas with water or ground cover.
- Stabilizing soils and establishing persistent ground cover as soon as possible after grading and construction activities.
- Reducing equipment idling times and onsite vehicle speeds.
- Utilizing vapor-recovery systems for fuel-storage facilities.
- Using low- or zero-emissions equipment.
- Using covered haul trucks during materials transportation.
- Minimize the transportation distance between the fill origin location and the Proposed Action study area, and ensure all vehicles used for the project are fuel-efficient and meet emissions standards.

Biological Resources

- Use a conservative approach to project design that minimizes permanent and temporary disturbances to soil and native vegetation.
- Limit tree clearing activities from November 15 to March 31 to occur outside of the breeding seasons of bats and migratory birds.
- Install water quality best management practices during and after construction to minimize erosion and sedimentation in waterways.
- Use clean project materials (e.g., weed-free straw) or materials native to the worksite to avoid introducing invasive species from contaminated sources.
- Use native plants for revegetation and stormwater management.
- Avoid blanket herbicide applications; instead, spot-treat undesirable tall woody vegetation and invasive weeds.
- Where mowing is necessary and in accordance with the Wildlife Hazard Management Plan, reduce frequency to once every few years during the dormant season (i.e., after first frost in late fall and before bird nesting in early spring), leaving some refugia for overwintering wildlife.
- Monitor for invasive plants before, during, and after project activities and promptly control any identified infestations.

Hazardous Materials and Waste, Solid Waste, Pollution Prevention, and Contaminated Sites

- In accordance with municipal and residual waste regulations, the construction contractor will ensure that only clean fill would be transported to the Proposed Action site and that all off-site waste and borrow areas have an Environmental and Sampling Plan approved by the local conservation district or Pennsylvania DEP.
- The construction contractor will submit a Standard Clean Fill note as required for General NPDES Permit approval application.
- Surface water runoff from the new RSA slopes will be subject to stormwater management, including monitoring and treatment of hazardous contaminants with stormwater management infrastructure to be expanded as appropriate to capture, convey, and treat the additional volume.
- If groundwater is anticipated to be encountered during construction activities, a site-specific Health and Safety Plan will be developed to address potential exposure to concentrations of lead, manganese, and vanadium that were detected above non-residential concentrations.
- In addition, if planned construction activities would require excavations or dewatering thereof, a Groundwater Management Plan will be developed, including procedures for the proper management, storage, sampling, transportation, infiltration, and/or disposal of potentially impacted groundwater.
- Construction activities associated with the Proposed Action will involve hazardous materials such as engine oil, lubricants, solvents, sealants, and paint. During construction activities, all hazardous materials used and all hazardous waste generated will be handled by the contractor in accordance with the contractor's management plan and other applicable federal, state, and local protocols.
- Hazardous materials storage and construction equipment maintenance will be conducted away from any surface water resources.

- The construction contractor will be responsible for pollution prevention, spill prevention, and response plans specifying the measures to be taken to prevent and, when necessary, clean up and minimize the environmental impact of any accidental releases of hazardous materials.

Historical, Architectural, Archeological, and Cultural Resources

- In the event an unanticipated discovery of previously unidentified archaeological resources is made during construction of the proposed undertaking, or if historic property concerns arise, construction activities in the vicinity of the discovery will stop, and all reasonable measures will be taken to avoid or minimize harm to the property until the FAA and ACAA conclude further consultation with Pennsylvania SHPO.

Noise and Noise-Compatible Land Use

- All construction activity would be conducted in compliance with local noise ordinances, which state that between 10 p.m. and 7 a.m. noise in excess of 55 dB cannot enter a residential community.

Water Resources (Wetlands, Floodplains, Surface Water, Groundwater)

- During the permitting process, mitigation measures may be determined appropriate by the USACE, as a requirement.
- Stormwater Pollution Prevention Plan – identifying equipment storage, cleaning and maintenance areas/activities; points of ingress and egress to the construction site; material loading, unloading, and storage practices and areas, including locations for construction materials, building materials, and waste materials; and materials, equipment, or vehicles that may come in contact with storm water.
- Construction Sequencing and Erosion Control Measures –
 - Erosion control measures consist of reducing erosive effects of rain on exposed soils through the use of temporary and permanent soil stabilization measures, stabilizing slopes, and re-establishing vegetation to stabilize disturbed areas and reduce stormwater flow velocities.
 - Common erosion control measures that may be used during construction include mulching, sodding, and/or seeding to stabilize exposed soils and establish ground cover.
- Structural Controls to Minimize Sediment Transport – The use of structural controls during construction to minimize erosion and sediment transport will be further detailed in individual project plans and specifications.
 - Structural controls may include, but not necessarily be limited to staked hay bales, silt fences, and floating baffles in adjacent water bodies.
- Pollution Prevention and Control – Plans may include, but not be limited to, implementing a construction-phase Stormwater Pollution Prevention Plan, Solid Waste Management Plan, and spill prevention and response plans documenting the measures that will be taken to prevent accidental releases to the environment.
 - In the event an accidental release should occur, the contractor will be required to comply with Federal, state, and local hazardous materials/waste management regulations to assure proper management of hazardous and other special waste streams for the Proposed Action.

- Land development and construction guidance provided in FAA Advisory Circular 150/5370.10G, Standards for Specifying the Construction of Airports, will be incorporated into the Proposed Action plans and specifications to reduce potential for erosion and minimize construction-related impacts.

CONCLUSION AND APPROVAL:

After careful and thorough consideration of the facts contained herein, the undersigned finds the federal action is consistent with existing national environmental policies and objectives as set forth in Section 101(a) of the National Environmental Policy Act of 1969 (NEPA) and it will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(c) of NEPA.

Recommended:	_____	09/06/2022
	Heather F. Davis-Jenkins Environmental Protection Specialist Harrisburg ADO	_____ Date
Approved:	_____	_____
	Rick Harner Manager, Harrisburg ADO	_____ Date