

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT

LOCATION

Pittsburgh International Airport (PIT)
Pittsburgh, Allegheny County, Pennsylvania

BACKGROUND AND INTRODUCTION

The Federal Aviation Administration (FAA) approved the Environmental Assessment for the *Pittsburgh International Airport (PIT) Microgrid Project* on May 8, 2020, through the issuance of a Finding of No Significant Impact (FONSI). The May 2020 FONSI was based on a Final Environmental Assessment (2020 EA) submitted by the Allegheny County Airport Authority (Airport Sponsor).

Following the issuance of the FONSI, the Airport Sponsor requested that the FAA approve a modification to the approved Microgrid Project to accommodate an additional 4.7 Megawatts of generating capacity from solar. The Airport Sponsor has recently proposed an expansion of the approved Microgrid Project, which is the modified Proposed Action considered in this FONSI. The FAA determined that supplemental National Environmental Policy Act (NEPA) documentation would be needed to determine if the modified Proposed Action would continue to have no significant impact under NEPA. As such, a supplemental EA was prepared pursuant to NEPA and the *Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508)*. Additionally, the supplemental EA meets the guidance identified in FAA Orders 1050.1F, *Environmental Impacts: Policies and Procedures* and 5050.4B, *NEPA Implementing Instructions for Airport Actions*.

This FONSI is based on the *Final Supplemental Environmental Assessment for the Pittsburgh International Airport PV Solar Array Microgrid Phase 2 Expansion* (Supplemental EA), dated December 2023, prepared by Rhea Engineers & Consultants, Inc. on behalf of IMG Solar LLC (the Project Proponent) and the Airport Sponsor, and under the supervision of the FAA. The Supplemental EA is hereby incorporated by reference.

DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action is an approximately 4.7 MW alternating current expansion to the previously approved and constructed 7.9-acre 3.0 MW Photovoltaic (PV) Solar Array associated with the PIT Microgrid. Both PV arrays are outside of the Air Operations Area on the southwest corner of Airport property on a capped and closed landfill, approximately 1,600 feet south of the extended centerline of Runway 10R- 28L and north of Interstate 376. The expansion to the Solar Array would occur on approximately 11.6 acres of land.

A thorough description of the Proposed Action is included in Section 2 of the Supplemental EA.

AGENCY AUTHORITY

On October 5, 2018, HR 302, the “FAA Reauthorization Act of 2018” (the Act) was signed into law (P.L. 115-254). In general, Section 163(a) limits the FAA’s authority to directly or indirectly

regulate an airport operator's transfer or disposal of certain types of airport land. However, Section 163(b) identifies exceptions to this general rule. The FAA retains authority:

1. To ensure the safe and efficient operation of aircraft or safety of people and property on the ground related to aircraft operations;
2. To regulate land or a facility acquired or modified using federal funding;
3. To ensure an airport owner or operator receives not less than fair market value (FMV) in the context of a commercial transaction for the use, lease, encumbrance, transfer, or disposal of land, any facilities on such land, or any portion of such land or facilities;
4. To ensure that that airport owner or operator pays not more than fair market value in the context of a commercial transaction for the acquisition of land or facilities on such land;
5. To enforce any terms contained in a Surplus Property Act instrument of transfer; and,
6. To exercise any authority contained in 49 U.S.C. § 40117, dealing with Passenger Facility Charges.

In addition, Section 163(c) preserves the statutory revenue use restrictions regarding the use of revenues generated by the use, lease, encumbrance, transfer, or disposal of the land, as set forth in 49 U.S.C. § 47107(b) and 47133.

Section 163(d) of the Act limits the FAA's review and approval authority for Airport Layout Plans (ALPs) to those portions of ALPs or ALP revisions that:

1. Materially impact the safe and efficient operation of aircraft at, to, or from the airport;
2. Adversely affect the safety of people or property on the ground adjacent to the airport as a result of aircraft operations; or
3. Adversely affect the value of prior Federal investments to a significant extent.

The expansion of solar generating capacity at PIT was submitted for a determination of Federal Action in accordance with the provisions of Section 163 and the FAA determined that the proposed project would have no material impact on aircraft operations, at, to, or from the airport; would not affect the safety of people and property on the ground adjacent to the airport as a result of aircraft operations; and would not have an adverse effect on the value of prior Federal investments to a significant extent. Therefore, the FAA does not have the authority to approve or disapprove changes to the ALP for the Proposed Action.

Concerning FAA authority to regulate land use, the parcels subject to the Proposed Action were acquired with federal funding. The FAA considers the proposed solar array to be a non-aeronautical land use, subject to federal approval.

Lastly, the Airport Sponsor is not requesting the use of any federal grant-in-aid funding or other funding sources subject to federal approval.

PROPOSED FEDERAL ACTION

The Proposed Action would be located on land previously acquired with federal funding and subject to obligations to maintain the land for aeronautical purposes in accordance with the grant assurances. The Airport Sponsor is requesting to lease this land to the Project Proponent for non-aeronautical development. The non-aeronautical use of federally-obligated lands acquired

with federal funding is subject to approval by the FAA in accordance with the *Policy Regarding Processing Land Use Changes on Federally Acquired or Federally Conveyed Airport Land* (Volume 88, Federal Register, Number 235, pages 85474-9, December 8, 2023). This approval is the Federal Action associated with the Proposed Project.

PURPOSE AND NEED

The purpose and need of the PIT Microgrid Project, as presented in the 2020 EA has not changed. As described in Section 3 of the Final Supplemental EA, the expansion of the Solar Array will ensure greater power reliability and energy sustainability. This will support the purpose and need of the Microgrid Project to provide power redundancy and resiliency at PIT to ensure greater power reliability and uninterrupted operations for the Airport and its passengers as well as improve sustainability of the airport.

ALTERNATIVES

Other than the No Action Alternative, alternatives to the proposed expansion of the Solar Array were not considered in the Supplemental EA as the expansion location was fixed by the location approved for the Microgrid Project in the May 2020 FONSI. A summation of the Microgrid Alternatives considered is included in Section 5 of the Supplemental EA.

SUMMARY OF NEPA ANALYSIS

The study area of the 2020 EA was expanded in the Supplemental EA to accommodate the changes associated with the proposed expansion of the Solar Array. The additional 11.6 acres of land to be developed is on property owned by the Airport Sponsor and is immediately adjacent to the Microgrid Project location. The project site is approximately 1,100 feet southwest of the centerline of Runway 10R-28L and north of Interstate 376 on a graded landfill cap. Section 4 of the Supplemental EA discussed changes to the Affected Environment.

Section 6 of the Supplemental EA provides evaluations of the environmental consequences for each of the environmental impact categories that could occur in the expanded study area associated with the Proposed Action in the Supplemental EA compared to those analyzed in the 2020 EA. Several impact categories (Coastal Resources, Farmlands, Visual Resources, Wild and Scenic Rivers, and Section 6(f) Resources) were not applicable as their resources were not present in the Proposed Action site. In addition, many of the impact categories evaluated, which were present in the Proposed Action site, had no change when compared to the impacts assessed in the 2020 EA. The following discussion provides highlights of the impact categories where the Proposed Action analysis indicated a difference in the extent of analysis or impacts when compared to the 2020 EA.

Air Quality

Construction emissions for the Microgrid Project were calculated with FAA's Airport Construction Emissions Inventory Tool (ACEIT) on the basis of 2014 emissions factors from the Environmental Protection Agency (EPA) as presented in the 2020 EA. The emissions factors used in ACEIT are no longer valid as EPA issued new emissions factors in 2020 with the update to their model, MOVES3. Accordingly, construction emissions from the Proposed Action have been estimated on the basis of the MOVES3 program and the original Microgrid construction emissions were recalculated to verify that construction emissions were below applicable de minimis values for the relevant criteria pollutants.

Allegheny County is in marginal nonattainment area for 8-hour Ozone and moderate nonattainment

for PM_{2.5}. The County also has partial SO₂ nonattainment. The project site falls within the SO₂ nonattainment area. The revised analysis conducted demonstrates that emissions from construction and operation of the entire Microgrid project, inclusive of the Proposed Action, fall below applicable de minimis values in accordance with the National Ambient Air Quality Standards (NAAQS) established by the Clean Air Act (CAA) for all years analyzed.

In accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *Airport Environmental Handbook*, no further analysis with respect to General Conformity is needed. The Proposed Action conforms to the Pennsylvania State Implementation Plan (SIP) and the CAA. Additionally, the operation of the Proposed Action would not create any new violation of the NAAQS, delay the attainment of any NAAQS, nor increase the frequency or severity of any existing violations of the NAAQS. Based on the above, and since air quality analysis indicated that the Proposed Action will not result in a pollutant concentration that would exceed NAAQS, it will not result in significant adverse impacts to air quality. See Section 6.1, *Ambient Air Quality*, of the Supplemental EA and Appendix B for detailed analysis.

Climate

On January 6, 2023, the Council on Environmental Quality issued updated *Guidance on Consideration of Greenhouse Gas Emissions and Climate Change*. The guidance directs federal agencies to consider: (1) the potential effects of a proposed action on climate change, including by assessing both Greenhouse Gas (GHG) emissions and reductions from the Proposed Action; and (2) the effects of climate change on a proposed action and its environmental impacts. Potential impacts to climate were reviewed in the 2020 EA in the context of emissions of carbon dioxide equivalents (CO_{2eq}) for construction and operations of the Microgrid with the conclusion that GHG emissions would be reduced from PIT's previous energy consumption.

The 2020 EA did not quantify this interpretation but did provide an estimate of CO_{2eq} emissions of about 2,300 metric tons associated with the construction of the Microgrid. Revised estimates of construction associated with the change in modeling methodology now estimate total CO_{2eq} emissions of 894 metric tons associated with the construction of the Microgrid. Construction of the Proposed Action would produce an additional 48 metric tons of GHG emissions. Operational emissions from the power plant were not estimated for the power plant in terms of CO_{2eq} emissions in the 2020 EA.

Actual annual GHG emissions from the power plant have been measured at 60,758 metric tons (mT) CO_{2eq} for an annual production of 112,003,810 kilowatts (kW) per hour (kWh). This corresponds to 0.0005 mT CO_{2eq} emissions per kWh. Based on other generation sources within Allegheny County, this is roughly a 30% reduction from normal power supplied through the grid. Expanding solar generating capacity in the Microgrid by 4.7 MW is would further reduce per unit GHG emissions associated with the electrical production of the Microgrid.

Hazardous Materials, Solid Waste, and Pollution Prevention

The 2020 EA demonstrated that the Microgrid would be located in an area that includes one permitted landfill and several contaminated areas of concern that are the result of past industrial and airfield activities on PIT property. The existing Solar Array from the approved Microgrid Project is atop the closed landfill site and is closed to public access. The Proposed Action of the will also be developed on the landfill immediately adjacent to the existing Solar Array.

The project was granted a Landfill Minor Permit Modification that is contained in Appendix D

of the Supplemental EA. The Minor Permit Modification provides authorization to drill up to seven feet into the landfill cap, provided the metal beams driven into the ground to support the solar panels maintain at least 6 feet of separation above the 3.5-foot thick bottom liner system to allow for any settlement. Breaching the landfill bottom liner is prohibited. Electrical conduit and control equipment are prohibited from penetrating the landfill cap. Construction will minimally disturb the landfill cap at all times. To prevent any surface water infiltration at the base of the driven metal posts, a layer of bentonite clay chips or powder will be poured around the base of each completed post. A topsoil/vegetative layer will be replaced over the bentonite clay chips or powder layer. This seal will prevent any infiltration at the base of each metal post. Routine inspection of the solar array will be performed to identify any need for additional bentonite around the posts to prevent surface water infiltration.

Additional discussion in Section 6.5, *Hazardous Materials, Solid Waste, and Pollution Prevention*, of the Supplemental EA, includes additional discussion on the decommissioning of the solar panels. Impacts from the Proposed Action would be similar to those that were discussed in the 2020 EA and all permit and mitigation requirements from the May 2020 FONSI would apply to the Proposed Action as well. There would be no significant impacts to Hazardous Materials, Solid Waste, and Pollution Prevention from the Proposed Action.

Historic, Architectural, Archaeological, and Cultural Resources

The 2020 EA describes the historic, architectural, archaeological and cultural resources of the Microgrid project. The analysis and conclusions of the 2020 EA and FONSI are also applicable to the Proposed Action. A Section 106 concurrence for the Microgrid was not solicited from the PA SHPO at the time the 2020 EA was prepared as it is located on disturbed ground. A determination that the Proposed Action would not affect historic resources was provided to the Pennsylvania State Historic Preservation Office and they concurred. The Proposed Action has no effects or impacts to Historic, Architectural, Archaeological, and Cultural Resources.

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

The discussion presented in the 2020 EA was supplemented with reports derived from the application of the EPA's EJScreen tool. The EJScreen tool identifies the nearest minority or low-income community to be in Coraopolis, more than 2.5 miles from the nearest point of ACAA property and approximately 5 miles from the Microgrid and Proposed Action. As the PIT Microgrid and Proposed Action are entirely within Airport Sponsor property isolated from local communities, no impacts to Environmental Justice communities would occur from the Proposed Action.

Additionally, local schools and day care centers were also considered to evaluate potential impacts to children's health. The Proposed Action will not have the potential to lead to a disproportionate health and safety risk to children. The nearest school, the Goddard School of Moon Township, is located approximately 2.6 miles northeast from the Proposed Action. The two nearest existing daycares are a located approximately 1.7 miles northwest and 2.1 miles to the northeast of the Proposed Action site. A new daycare will operate on airport property, approximately 0.9 miles northwest of the Proposed Action site in the summer of 2023. Due to the placement of the nearest school and daycares, the Proposed Action would not have the potential to lead to a disproportionate health or safety risk to children.

Water Resources

On April 1, 2020, a wetland investigation of the Microgrid site, including the Proposed Action site, was conducted using guidelines outlined in the 1987 Corps of Engineers Wetland Delineation Manual. The Proposed Action site was revisited on January 5, 2023, to determine if any changes in conditions had

occurred from what was observed in 2020. A previously identified wetland about 50 feet north of the proposed project's construction area was observed to still be present. The wetland is approximately 596 square feet and is located within the man-made drainage swale in the northeastern portion of the project site. However, since the initial studies of the area were conducted the jurisdictional status of wetlands and waterways has changed in response to updated regulations and Supreme Court decisions. This wetland near the Proposed Action site is isolated from drainage and does not blend or flow into a neighboring water that is a channel for interstate commerce. Therefore, it would not be a jurisdictional wetland or Water of the United States in accordance with the revisions to jurisdictional status. This was confirmed via coordination with the US Army Corps of Engineers as contained within Appendix G of the Supplemental EA.

Because construction or vehicle movement is unlikely to occur within the drainage swale, and because the wetland sits outside of the proposed project's construction area, it is expected that no impacts to this wetland will occur due to development activities. Accordingly, the Pennsylvania Department of Environmental Protection (PADEP) does not require permitting under 25 Pa. Code § 105 as the wetland will not be impacted. Additionally, the Proposed Action does not require a construction-phase National Pollutant Discharge Elimination Systems permit in accordance with PADEP's Chapter 102 regulations as ground disturbance is less than an acre and PADEP has ruled that groundwater at the site of the Proposed Action no longer requires monitoring.

Cumulative Impacts

An updated set of past, present, and reasonably foreseeable future actions were evaluated for potential cumulative impacts on affected resources. An analysis of the cumulative effects of the Proposed Action in combination with past, present, or reasonably foreseeable future projects is presented in the Supplemental EA and supports the conclusion that adverse cumulative impacts are not likely to result from implementation of the Proposed Action. See Section 6.12 *Cumulative Impacts*, for additional detail.

PUBLIC INVOLVEMENT

The Airport Sponsor published local Notices of Availability and Requests for Comment on the Draft Supplemental EA in the Pittsburgh Post-Gazette on October 26, 2023. The Draft Supplemental EA was made available for review on the Airport Sponsor's website at: <https://flypittsburgh.com/wp-content/uploads/2023/10/draft-supplemental-ea-pit-phase-2-pv-solar-array-project.pdf>.

The review and comment period occurred from October 26, 2023, to November 30, 2023. No comments were received during the public comment period.

CONDITIONS/MITIGATION MEASURES

The conditions included in the 2020 EA FONSI are incorporated by reference and pertain in full to the Proposed Action in the Supplemental EA. The Proposed Action will have similar impacts to those described in the 2020 EA. As such, no new mitigation measures are proposed for the Proposed Action in the Supplemental EA.

CONCLUSION AND APPROVAL

I have carefully and thoroughly considered the facts contained in the attached EA. Based on that information, I find the proposed Federal action is consistent with existing national environmental policies and objectives of Section 101 (a) of the National Environmental Policy Act of 1969 (NEPA) and other applicable environmental requirements. I also find the proposed Federal action with the required mitigation referenced above will not significantly affect the quality of the human environment or include any conditions requiring consultation pursuant to section 102(2)(c) of NEPA. As a result, FAA will not prepare an EIS for this action.

RECOMMENDED: **ANDREW N BROOKS** Digitally signed by ANDREW N BROOKS
Date: 2024.01.31 07:46:09 -05'00'

Environmental Program Manager Date
Federal Aviation Administration
Eastern Region

APPROVED: **RICKY W HARNER** Digitally signed by RICKY W HARNER
Date: 2024.02.01 12:46:38 -05'00'

Manager Date
Harrisburg Airports District Office

DISAPPROVED: _____
Manager Date
Harrisburg Airports District Office