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

March 29, 2021

Andrew Brooks
Environmental Program Manager
Federal Aviation Administration
Eastern Regional Office
1 Aviation Plaza
Jamaica, NY 11434

RE: New Passenger Terminal and Aerotech Business Park Project, North Central West Virginia Airport, Draft Environmental Assessment, Harrison County, WV

Dear Mr. Brooks:

In accordance with the National Environmental Policy Act of 1969 (NEPA), Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Federal Aviation Administration (FAA), New Passenger Terminal and Aerotech Business Park Project, North Central West Virginia Airport, Draft Environmental Assessment, located in Harrison County, West Virginia.

The study involves a proposal by the Benedum Airport Authority to construct a new terminal (35,000 SF) with associated apron (10,000 SF) at the North Central West Virginia Airport (CKB) to meet the current passenger and safety demands, as well as a new passenger parking and rental car lot. The project proposal also includes the grading of land to build a 100 contiguous acre aerotech business park that will have direct runway access. The study states, 25 wetlands and 24 streams, both jurisdictional and non-jurisdictional, will be permanently impacted via fill by the proposed action. The U.S. Army Corps of Engineers issued an individual permit with special conditions on February 18, 2021.

The project's purpose is to provide better customer experience for passengers through ensuring safe, secure, and efficient airport operations. The purpose of developing the remaining acreage into an aerotech business park is to be able to market the property to the aviation industry and to diversify the economic health of CKB. The proposed action is needed to meet the current passenger demand and to build and aerotech business park to accommodate a growing demand for aeronautical related industrial development and CKB self-sufficiency.

EPA appreciated having the opportunity to review the EA and provide FAA with comments on the study. Enclosed are EPA's comments for your consideration. EPA does not object to the project moving forward. We do recommend the project sponsor and FAA continue to look for opportunities to avoid and minimize impacts to the natural environment and continue public outreach, engaging with the community on the status of the project as it moves forward.

If you have any questions or concerns, please contact Joy Gillespie at 215-814-2793 or gillespie.joy@epa.gov.

Sincerely,

Stepan Nevshehirlian
Environmental Assessment Branch Chief
Office of Communities, Tribes and
Environmental Assessment

Enclosure

Detailed Comments for Draft Environmental Assessment
New Passenger Terminal and Aerotech Business Park Project

Purpose and Need

- On page 1-6 of the EA it states the West Virginia State Economic office receives several inquiries a year from companies who are looking for property that is runway accessible. The study also states the aerotech business park "will be" marketed to the aviation industry. To bolster the need, the study would benefit from including whether any tenants have already committed to leasing the space or any additional information that supports the need discussion for the business park grading.

Alternatives

- The study states several criteria were used to determine if an Alternative meets the Purpose and Need, including customer service. We recommend including in the study how the level of customer service is determined and the threshold where customer service is considered not to be met.

Water Resources

- The study would benefit from a more detailed discussion on the proposed stormwater infrastructure for the project, including a map of the stormwater infrastructure layout. With the proposed increase in impervious surface, it is important that post-construction stormwater runoff be controlled. EPA did not notice a discussion pertaining to the use of low impact design (LID) or green infrastructure (GI) in the design of the proposed project. EPA recommends incorporating LID and/or GI in the project design where possible. EPA has concerns that the increase in impervious surface combined with the permanent loss and modification of headwater systems has the potential to adversely impact the downstream aquatic resources. LID and GI are useful means to mitigate these effects. Technical guidance in implementing GI and LID practices can be found at the following sites:
    - www.epa.gov/greeninfrastructure
    - www.epa.gov/nps/lid
    - www.epa.gov/smartgrowth

- EPA encourages rerouting stream channels to the maximum extent possible to allow for continued ecological function to persist rather than piping the channel, which would eliminate the stream ecological function and value all together.

Pollution Prevention

- Please provide in the study more detail on how de-icing fluid and other hazardous materials and waste will be "properly managed" as mentioned in the study and provide a description of "appropriate facilities" as mentioned in the report on page 5-3.

- When designing stormwater management facilities, please consider proposed activities on-site, including deicing. If stormwater runoff has potential to be contaminated during facility operations, please consider stormwater treatment options.

Public Participation and Outreach

- Due to the apparent scale of this project and potential impacts on the local community during construction and operation, especially when increase in truck traffic or noise is anticipated. We suggest developing a public engagement plan to layout strategies that would best solicit input from the local community and inform the community on the progress of the construction project and how it might impact the surrounding community. Signage near the proposed project site with a construction schedule or updates in the local media outlets are two examples of how the project sponsor can keep the public informed on the status of the project.