

# ENVIRONMENTAL EVALUATION FORM "C" (Short Environmental Assessment) for AIRPORT DEVELOPMENT PROJECTS



~ Aviation in Harmony with the Environment ~



# FEDERAL AVIATION ADMINISTRATION EASTERN REGION AIRPORTS DIVISION

Airport Name: <u>Washington Dulles International Airport (IAD)</u>
Proposed Project: <u>International Arrivals Building (IAB) Expansion</u>

This Environmental Assessment becomes a Federal document when evaluated and signed by the responsible FAA official.

Responsible FAA Official:	Date:

The form on which this document is based is a modification of the Form C developed by FAA Eastern Region dated March 22, 1999. The original form contained references to specific paragraphs of FAA Order 5050.4A. In the modified form, these references were replaced with references to the corresponding paragraphs of FAA Order 5050.4B, which replaced Order 5050.4A effective April 28, 2006, and FAA Order1050.1E.

#### FAA EASTERN REGIONAIRPORTS DIVISION ENVIRONMENTAL EVALUATION FORM "C" FOR SHORT ENVIRONMENTAL ASSESSMENTS

Environmental Evaluation Form "C," Short Environmental Assessment (EA), is based upon the guidance in Federal Aviation Administration (FAA) Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions For Airport Actions* or subsequent revisions, which incorporates the Council on Environmental Quality's (CEQ) regulations for implementing the National Environmental Policy Act (NEPA), as well as the U.S. Department of Transportation environmental regulations (including FAA Order 1050.1E or subsequent revisions), and many other federal statutes and regulations designed to protect the Nation's natural, historic, cultural, and archeological resources. It was prepared by FAA Eastern Region Airports Division, and is intended to be used for proposed Airports projects in this region only. If you wish to use it for projects in other regions or divisions, you must first coordinate with that region or division to determine whether they approve of its use.

Form C is intended to be used when a project cannot be categorically excluded (CATEX) from formal environmental assessment, but when the environmental impacts of the proposed project are expected to be insignificant and a detailed EA would not be appropriate. Accordingly, Form C is intended to meet the intent of a short EA while satisfying the regulatory requirements of an EA. Proper completion of Form C would allow the FAA to determine whether the proposed airport development project can be processed with a short EA, or whether a more detailed EA must be prepared. FAA normally intends to use a properly completed Form C to support a Finding of No Significant Impact (FONSI).

#### **Applicability**

Form C should be used if the sponsor's proposed project meets the following two (2) criteria:

1) The proposed project involves conditions ("extraordinary circumstances") identified in Order 5050.4B paragraph 903 (projects normally requiring an EIS); paragraph 702 (projects normally requiring an EA); Table 6-3 (extraordinary circumstances); or paragraph 706.h (cumulative impacts), and the sponsor shall demonstrate that involvement with, or impacts to, the extraordinary circumstances are not notable in number or degree of impact, and that any significant impacts can be mitigated below threshold levels.

2) The proposed project must fall under one of the following categories of Federal Airports Program actions noted with an asterisk (\*):

- (a) Approval of an airport location (new airport).
- \*(b) Approval of a project on an airport layout plan (ALP).
- \*(c) Approval of federal funding for airport development.
- \*(d) Requests for conveyance of government land.
- \*(e) Approval of release of airport land.
- \*(f) Approval of the use of passenger facility charges (PFC).
- \*(g) Approval of development or construction on a federally obligated airport. Do any of these listed Federal Airports program action(s), 2(b) - (g), apply to your project?

Yes X No\*\* If "yes," list them here (there can be more than one).

- 2(b) Approval of a project on an Airport Layout Plan.
- 2(g) Approval of development or construction on a federally obligated airport If "no," see (\*\*) below.
- \*\* If the proposed project does not meet 1) or 2) above, i.e., one or more answers to the questions resulted in a (\*\*), <u>do not complete this Form</u>. Rather, contact the appropriate official (listed at the end of this form) for additional instructions.

Complete the following information:

1. Project Location:

Airport Name: Washington Dulles International Airport

Airport Address: P.O. Box 17045, Washington, D.C. 20041-0045

City: County: Loudoun State: Virginia

2. Airport Sponsor Information:

Point of Contact: William C. Lebegern, P.E.

Address: Room 155 West Building, Ronald Reagan Washington National Airport

Washington, DC 20001-4901

Telephone: (703) 417-8160 Fax: (703) 417-8199

E-mail: william.lebegern@mwaa.com

3. Evaluation Form Preparer Information:

Point of Contact: Francis A. Cirillo, Jr.

 Address:
 45045 Aviation Dr., Suite 200, Dulles, VA 20166-7528

 Telephone:
 (703) 572-2146 Fax: (703) 572-1279

 E-mail:
 Frank.Cirillo@mwaa.com

4. Proposed Development Action (describe **ALL** associated projects that are involved):

The Metropolitan Washington Airports Authority (the Authority) proposes to expand the International Arrivals Building (IAB) at Washington Dulles International Airport (Figure 1). This project includes the expansion and/or refurbishment of the IAB passenger and basement level. The existing facilities of approximately 190,000 square feet (sf) will be expanded by about 180,000 sf to about 370,000 sf. The project will enlarge the area for passenger queuing in the immigration lobby, increase the number of passport control booths to comply with current Customs and Border Patrol processing requirements and regulations (48 agent positions vs. the existing 38 positions), and

provide additional baggage claim devices with a presentation length to assure the optimum baggage holding capacity (1,800 linear feet of total presentation length vs. the existing 960 linear feet). The basement area, used primarily for processing inbound and outbound baggage, will increase from approximately 70,000 sf to approximately 164,000 sf. The Mobile Lounge docks will be relocated from the west side of the existing IAB to the south side of the expanded facility.

The expansion will utilize the area to the west and south of the existing IAB containing the footprint of the existing Shop 1 Annex (Building 2409), which would be demolished in the fall of 2007. The IAB Expansion would commence in winter or spring of 2008 and be completed by 2011. Figures 2-4 illustrate the proposed facility's location and appearance. Figure 5 shows the alternative locations.

#### 5. Describe the Purpose of and Need for the Project:

The purpose and need for the International Arrivals Building (IAB) expansion is to address current and future deficiencies, and to improve its ability to handle a larger share of the airport's international market. When the International Arrivals Building was opened in 1991, it had a peak-hour capacity of approximately 2,000 passengers per hour. Changes in passport control procedures in recent years, among other factors, have reduced the peak-hour capacity to 1,000 passengers per hour, well below the 1,600 passengers per peak-hour demand experienced in 2005. By 2011, demand is expected to increase to 1,900 passengers per peak hour.

The capacity of the IAB is governed by any one of the unique processes contained in the international arrival process. In the case of the IAB, despite recent installation of additional passport control booths that have increased processing capacity, deficiencies in the IAB's baggage claim hall – caused by inadequate claim presentation coupled with lack of circulation and waiting space – will continue to constrain the IAB's capacity to approximately 1000 passengers per hour.

Additionally, this project enhances the baggage make-up area by providing additional baggage make-up devices, improved bag tug flows, and better access to the baggage handling area. The expansion project will include demolition and removal of the existing Building 2409, the Shop 1 Annex, to accommodate the footprint and operations of the IAB expansion to the west and south of the existing IAB.

6. Alternatives to the Project: Describe any other reasonable actions that may feasibly substitute for the proposed project, <u>and</u> include a description of the "No Action" alternative. If there are no feasible or reasonable alternatives to the proposed project, explain why:

Expansion of the existing facility was deemed to be the most cost-effective alternative; additionally, it is more viable from a constructability perspective. With minimal impacts to landside and airside operations, expansion of the existing IAB would provide more efficient operations and enhanced passenger convenience. The Authority has invested significant resources to develop the existing facility. To move the IAB function to another site would require a significant investment to recreate the existing facilities at a new location. Saarinen's vision for the Airport included an international arrivals component on the west side of the terminal. Hence, placing this function in any other location would be inconsistent with the original Master Plan.

Expansion of the existing IAB, with various combinations of links to airside facilities, was evaluated. The alternatives were judged and ranked, and in all cases expansion of the existing facility was more economical, led to a shorter implementation time, and had fewer impacts to airside and landside operations. With the expansion of the facility, a more efficient floor plan could be developed to facilitate Customs and Border Protection (CBP) and airline operations, as well as creating a more convenient facility for passenger movements. Likewise, alternatives initially considered for a new IAB or recreating the existing function in another area are cost prohibitive and would have significant impacts to existing Airport operations and facilities.

Alternative #1. East side of the Terminal – Relocating the IAB on the east side of the Terminal in an expanded form. Relocating the existing IAB facility on the east side of the Terminal would require a significant investment to develop a duplicate of the existing facility. See Figure 5. To meet the current and near term demands, the new facility on the east side of the Terminal would need to duplicate the existing 190,000 sf facility and add an additional 180,000 sf of space. Dependent on location and layout of an east-side IAB facility, other facilities/functions located on the east side of the Terminal might need to be demolished and relocated, including the MU2 baggage make-up building and the utility building providing heating and cooling for the Terminal and surrounding buildings. Implementation of this concept would take much longer and cost much more than expanding the existing IAB, due to the difficulty of relocating existing facilities and rerouting important utility lines. The Authority has invested a significant amount of resources in developing the existing facilities. To move the IAB function to another site would require a similar investment inflated to today's dollars to recreate the new facility. Placing the IAB on the east side of the terminal would be inconsistent with the original Master Plan and Saarinen's vision for IAD. Site requirements for constructability and operations as well as major historic concerns are very restrictive when applied to the necessary design configuration. Consequently, this alternative is not currently under active consideration, and it is not investigated further in this EA Form C.

Alternative #2. Between Concourse A/B and the Terminal – Relocating the IAB to between Concourse A/B and the Terminal in an expanded form. See Figure 5. The conceptual design for this alternative would place the new IAB facility below ground between Concourse A/B on the east or west side. Passengers would access the facility via sterile corridors from Concourse B and would exit via a non-secure tunnel leading toward the landside for access to the curb, parking, and other ground transportation. This alternative would replace the existing IAB and require construction of about 370,000 sf of new facilities to meet current and future demand. This concept would have a dramatic impact on airside operations during construction and would cost much more than expanding the existing facility. Implementing this concept would have the added issue of constructing an underground facility in an operating airfield as well as the development of a non-secure tunnel leading from the airside to the landside. As with Alternative 1, the Authority's substantial investment in the existing facility, the high costs of its replacement, and inconsistency with the original Master Plan have caused this alternative to be eliminated from further active consideration in this EA Form C.

Alternative #3. North of the Terminal in the bowl parking area – Below ground facility with a sterile/secure tunnel allowing passengers to move from the airside to the facility on the landside.

An IAB facility located further in the landside portion of the Airport was considered as an alternative to move the center of activity from straddling the airside and landside to a full landside operation.

See Figure 5. This alternative would develop a replacement IAB facility in the bowl parking area

below ground. Passengers would be delivered to the facility via a sterile/secure corridor and would exit the facility directly to landside elements such as parking, curbside, or the ground transportation center. Delivering baggage to the new facility was more problematic than other alternatives and impacts to the landside would be very significant during construction requiring a longer implementation schedule. Relocating this replacement IAB facility would carry an even higher cost than expanding the existing facility as described in Alternatives 2 and 3 above. As with Alternatives 1 and 2, the Authority's substantial investment in the existing facility, the high costs of its replacement, and inconsistency with the original Master Plan have caused this alternative to be eliminated from further active consideration in this EA Form C.

Alternative #4. IAB/International Terminal along cargo building line - Replacement IAB facility northwest of the terminal along the cargo building line. An international concourse would be developed to feed into this new IAB to more efficiently use the site and the new facility. See Figure 5. This option was not deemed in any way consistent other alternatives for comparison. This alternative, without the attached concourse was similar to the east-side alternative (Alternative #1) in that existing facilities/functions would need to be relocated to allow for the new IAB. As with Alternatives 1-3, the Authority's substantial investment in the existing facility, the high costs of its replacement, and inconsistency with the original Master Plan have caused this alternative to be eliminated from further active consideration in this EA Form C.

No Action Alternative. The existing IAB would not adequately accommodate current demand as well as the demand initially planned for the facility. Passengers and air carrier operations would continue to cause congestion. Under the No Action Alternative, the ability of Washington Dulles International Airport to attract additional international flights could be hampered, with potential adverse effects on opportunities and growth in Northern Virginia and the National Capital Region. The No Action Alternative does not meet the purpose and need described in Section 4.

1. Describe the affected environment of the project area (terrain features, level of urbanization, sensitive populations, etc). Attach a map or drawing of the area with the location(s) of the proposed action(s) identified. Attachment? Yes X No For the proposed project, the IAB would remain in its existing location and expand to the west and south as indicated in Figure 3. The project is located completely within the landside area of the airport. There are no sensitive populations within the project area. The nearest schools, daycare centers, or places of public assembly are located outside Washington Dulles International Airport, approximately 1.5 miles or more from the project area. The proposed project is within the Washington Dulles International Airport Historic District, which is eligible for listing on the National Register of Historic Places. Land cover in the affected environment is impervious and developed. The site of the proposed IAB expansion is bounded to the north by the parking garage walkway, to the west by the access road and equipment maneuvering area of the Shop 1 Annex, and to the south by the access road that serves Shop 1. After construction, the space between Shop 1 and the IAB will be wider than what currently exists between Shop 1 and the Shop 1 Annex, resulting in additional maneuvering space in front of the Shop 1 service bays.

2. Are there attachments to this Form? Yes X No If "yes," identify them below. Figure 1. Washington Dulles International Airport (IAD) General Location Map

Figure 2. Project Area for IAB Expansion Area and Demolition of Shop 1 Annex, Washington Dulles International Airport (IAD)

Figure 3. International Arrivals Building (IAB) Site Plan and Associated Projects

Figure 4. Artist's Rendering of International Arrivals Building with Proposed Expansion

Figure 5. Alternatives to International Arrivals Building (IAB)

Attachment A. Excerpt from Minutes of February 14, 2006 Meeting Between the Metropolitan Washington Airports Authority and the Virginia Department of Historic Resources

Attachment B. Technical Memorandum, Shop 1 Annex Building, by Mike McCarty [Parsons Management Consultants], April 17, 2006

<u>Attachment C. E-Mail from Henry Ward to Marc Holma Concerning Additional Modifications to West Service Buildings, February 28, 2007</u>

Attachment D. Memorandum of Agreement between the Virginia State Historic Preservation Office and the Metropolitan Washington Airports Authority

Attachment E. Comments Received Regarding the Draft Environmental Assessment

9. Environmental Consequences – Special Impact Categories (refer to corresponding sections in 5050.4A , or subsequent revisions, for more information and direction to complete each category, including discussions of Thresholds of Significance).

#### (1) NOISE

- 1) Does the proposal require a noise analysis per Order 5050.4A? Explain. (Note: Noise sensitive land uses are defined in Table 1 of FAR Part 150). Yes \_\_\_\_\_ No \_X\_ The proposed project is not expected to result in an increase in airport operations (types and number of aircraft used, runway layout, and runway utilization). Construction noise will be temporary, localized, and a minor increment to the existing noise of aircraft and vehicle operations in the vicinity. Therefore, no noise impacts are expected to occur as a direct result of the implementation of the proposed project.
- 2) If "yes," determine whether the proposed project is likely to have a significant impact on noise levels over noise sensitive areas within the DNL 65 dBA noise contour. Not Applicable.

#### (2) COMPATIBLE LAND USE

- (a) Would the proposed project result in other (besides noise) impacts exceeding thresholds of significance that have land use ramifications, such as disruption of communities, relocation of residences or businesses, or impact natural resource areas? Explain.
- \_\_No. Since the proposed project involves construction located entirely within the airport proper, the project will not result in the relocation of residences and businesses or disrupt established communities or planned development. The proposed project is consistent with the plans noted in Item 21(c) below
- (b) Would the proposed project be located near or create a wildlife hazard as defined in FAA Advisory Circular 150/5200-33, "Wildlife Hazards on and Near Airports"? Explain. No.

#### (3) SOCIAL IMPACTS

(a) Would the proposed project cause relocation of any homes or businesses? Yes\_\_\_\_ No \_\_X Explain. See Section 2(a) above\_\_\_\_

- (b) If "yes," describe the availability of adequate relocation facilities Not Applicable.
- (c) Would the proposed project cause an alteration in surface traffic patterns, or cause a noticeable increase in surface traffic congestion? Explain.

No. Traffic is not expected to increase as a result of the proposed project. The proposed project is intended to expand the existing facility to ease current congestion and enhance services provided at the airport. There may be temporary construction traffic impacts as described in section (20) below.

#### (4) INDUCED SOCIOECONOMIC IMPACTS

Would the proposed project cause induced, or secondary, socioeconomic impacts to surrounding communities, such as change business and economic activity in a community; impact public service demands; induce shifts in population movement and growth, etc.? Yes\_\_\_ No  $\underline{X}$ \_ Explain \_See section (3) above.

#### (5) AIR QUALITY

- (a) Does the proposed project have the potential to increase airside or landside capacity, including an increase in capacity to handle surface vehicles? Explain \_Yes. The project will increase landside capacity of the IAB, but no increase in operational air pollutant emissions is expected beyond those forecast in the Final Environmental Impact Statement for New Runways, Terminal Facilities and Related Facilities at Washington Dulles International Airport (FAA 2005). Air emissions sources at the airport include stationary sources such as heating equipment and emergency generators and mobile sources such as mobile lounges and other vehicular traffic. Air emissions will be within the air quality permit limitations.
- (b) Identify whether the project area is in a non-attainment or maintenance area for any of the six (6) criteria air pollutants having National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act Amendments (CAAA), and identify which pollutant(s) apply. If the proposed project is in an attainment area, no further air quality analysis is needed; skip to item (6). See EPA Green Book at www.epa.gov/oar/oaqps/greenbk for current attainment areas. The Virginia Department of Environmental Quality (VDEQ) implements the federal and state air quality programs in the state. The federal program was established under the authority of the federal Clean Air Act (CAA), as amended. Under the CAA, National Ambient Air Quality Standards (NAAOS) have been established for six criteria pollutants: ozone (O<sub>3</sub>), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), lead (Pb), and particulate matter (PM). Areas that are not in compliance with a criteria pollutant standard are defined as being in nonattainment for that pollutant. Loudoun County (the Washington Metropolitan area), where the airport is located, is currently in attainment for all criteria pollutants except ozone and PM. The Washington Metropolitan area is classified as moderate nonattainment for the new 8-hr ozone standard (0.08 ppm), and as nonattainment for fine particulate matter (PM<sub>2.5</sub>, particles smaller than 2.5 microns) for which the standard is 35 micrograms per cubic meter as a 24-hr average, or 15 micrograms per cubic meter as an annual average. The Metropolitan Washington Council of Governments is preparing State Implementation Plans for both ozone and PM<sub>2.5</sub>.

Actions to be taken by the Virginia Department of Environmental Quality to reduce pollution to levels at or below the NAAQS are outlined in a CAA-mandated State Implementation Plan (SIP) (FEIS for New Runways, FAA, 2005).

(c) Is an air quality analysis needed with regard to indirect source review requirements or levels of aircraft activity (See Order 5050.4B and the 1997 FAA Handbook "Air Quality Procedures for Civilian Airports and Air Force Bases"). Explain. If "yes," comply with state requirements.

No.

(d)(1) Would the proposed action be an "exempted action," as defined in 40 C.F.R Part 51.853(c)(2) of the General Conformity Rule? If exempt, skip to item (6). List exemption claimed. The proposed action would not be an "exempted action."

(d)(2) Would the increase in the emission level of the regulated air pollutants for which the project area is in non-attainment or maintenance exceed the *de minimis* standards? Yes \_\_\_\_\_ No\_X\_\_\_

Actions for which the emission levels are less than the *de minimis* levels established by EPA are presumed to be in conformity with applicable SIPs. The *de minimis* levels for NOx and VOC are 100 tons/yr and 50 tons/yr, respectively. Although a SIP for PM<sub>2.5</sub> has not been completed for the Washington Metropolitan non-attainment area, EPA has established a *de minimis* level of 100 tons/yr for PM<sub>2.5</sub>.

The proposed IAB Expansion facility will include an emergency backup generator powered by diesel, propane, or natural gas fuel. Combustion emissions would occur from the backup power generator, a nonmajor stationary source. These emissions would primarily be CO, oxides of nitrogen, and sulfur dioxide. The estimated total annual time of operation would be less than 100 hours. Because of this infrequent use and small size of the engine generator, the engine generator would produce negligible air emissions. The emissions from the backup power generator would be below the *de minimis* level, and would not lead to a violation of air quality standards. Prevention of Significant Deterioration (PSD) Regulations, 40 CFR 52.21, define air quality levels that cannot be exceeded by major stationary sources. The emergency backup generator would not be a major stationary emission source; therefore the generator would not be subject to PSD review. Given the type of generator that may be installed, infrequent use, and small size, the engine generator would produce negligible air emissions well below de minimis limits and therefore would not require a conformity determination under Section 176(c) of the Clean Air Act, as amended. Depending on the bhp rating and amount of hours used, the generator may have to be added to the air quality permit for Washington Dulles International Airport.

During dry weather periods, fugitive dust could be generated during site preparation. In addition to being temporary, any impacts from fugitive dust would be negligible because of the small area that would be disturbed. Construction equipment emissions are estimated to be 83 tons of NOx and 9.3 tons of VOC over a 2.6-year period. These levels are well below the *de minimis* levels for these pollutants. The PM emissions for this proposed project are estimated to be 10.28 tons over a 2.6 years construction period; this represents an emission rate of 3.98 tons/year. Even if the emitted PM is presumed to consist entirely of PM<sub>2.5</sub>, the emission rate is well below the corresponding *de minimis* level of 100 tons/yr.

Construction and operation of the proposed project would result in negligible or no adverse impacts to ambient air quality in the airport vicinity.

(d)(3) If "no," would the proposed project cause a violation of any NAAQS, delay the attainment of any NAAQS, or worsen any existing NAAQS violation? Explain.

N/A.

(d)(4) Would the proposed project conform to the State Implementation Plan (SIP) approved by the state air quality resource agency? Explain, and provide supporting documentation. Emissions that would result from the proposed construction and operation activities will be below the *de minimis* level and in conformity with the SIP. See (a), (b), (c) & (d) above.

#### (6) WATER QUALITY

Describe the potential of the proposed project to impact water quality, including ground water, surface water bodies, any public water supply systems, etc. Provide documentation of consultation with agencies having jurisdiction over such water bodies, as applicable.

Impacts on water quality from construction and post-construction runoff from the International Arrivals Building are not expected to be significant or adverse. All construction and subsequent operational activities will be under restrictions identified in the Airport's Virginia Pollutant Discharge Elimination System (VPDES) stormwater discharge permit, as well as pertinent State guidance such as the *Northern Virginia Best Management Practices (BMPs) Handbook* and *Virginia Stormwater Management Handbook*. In addition to the management of stormwater runoff, the construction project will be required to have an individual erosion and sediment control plan reviewed and approved by the Authority's Building Codes/Environmental Department. As required under Title 10.1, Chapter 6, Article 1.1 of the Code of Virginia and Section 4 VAC50-60-380 of the Virginia Administrative Code, MWAA's contractor will obtain registration coverage under the General Permit for Discharges of Stormwater From Construction Activities.

#### (7) DEPARTMENT OF TRANSPORTATION SECTION 303/4(f)

Does the proposed project require the use of any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or land of an historic site of national, state, or local significance? Provide justification for your response. Include concurrence of appropriate officials having jurisdiction over such land regarding the use determination.

Yes. Because the project is on-airport, there are no parks, recreation areas or wildlife or waterfowl refuges subject to section 303/4(f) of the Department of Transportation Act directly or indirectly affected by this project. However the project is located within the National Register Eligible Washington Dulles International Airport Historic District and may have an adverse effect on the historic district (see Section 8 below).

#### (8) HISTORIC, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES

(a) Describe any impact the proposed project might have on any properties in or eligible for inclusion in the National Register of Historic Places. Provide justification for your response,

and include a record of your consultation with the State Historic Preservation Officer (SHPO), if applicable (attach correspondence with SHPO).

With the transfer of DCA and IAD from FAA to MWAA, MWAA became responsible for the identification, evaluation and protection of historic and archaeological resources contained on those properties. This responsibility is framed in a 1987 Programmatic Memorandum of Agreement (PMOA) between the FAA, the Virginia State Historic Preservation Officer (VASHPO) and the Federal Advisory Council on Historic Preservation (ACHP). Subsequently, an official determination was made that IAD contained a complex of historically significant buildings, structures, and site features, including the Saarinen Terminal, which was eligible for listing in the National Register of Historic Places. The 1987 PMOA, as well as other subsequent consultation and agreements lay out guidelines, requirements, and procedures that must be followed whenever a project has a potential to affect historical/archaeological resources of the airport property. Projects such as the IAB Expansion that will require construction, demolition, removal or alteration or rehabilitation of historic structures will require formal historic preservation consultation and the execution of a supplementary MOA. Construction activities, including both renovation and new projects affecting the historic character of the airport property must be completed according to the provisions of the Secretary of Interior's Standards for the treatment of Historic Properties.

The proposed project requires the demolition of the existing Shop 1 Annex, which has a legacy as the airport's original Aircraft Rescue and Fire Fighting (ARFF) facility. In addition, demolition and construction activity will block the east doors of the Shop 1 Building, requiring that doors on the west side of the Shop 1 Building be expanded vertically to allow servicing of mobile lounges and other large vehicles. As original Saarinen-designed West Service Buildings, the Shop 1 Building and the Shop 1 Annex Building have been identified as contributing elements of the National Register-eligible Dulles Airport Historic District. The Authority has determined that the removal of the Shop 1 Annex building, and alteration of the architectural character of the West Service Building complex, would have the potential to cause an adverse effect, but that the visual impact upon the Main Terminal forecourt and approach roadways would be limited by the location of the project behind the terminal approach ramps.

Although the majority of the expansion work will occur below the level of the existing roadway ramps and structural plinth, the expansion plan does include elements that may represent significant changes to the exterior appearance of the IAB. Although the IAB itself is not considered an historic property, these changes will occur in the center of the historic district, directly adjacent to the main terminal. As a result, the potential impact of the proposed exterior design of the IAB on the historic architectural character of the Main Terminal and surrounding historic district needs to be considered. The fact that the proposed IAB design takes into account and is consistent with the surrounding Saarinen-designed environment mitigates potential adverse effect of the changes to the IAB proper. As the IAB is physically separated from the Main Terminal, there is some additional architectural leeway.

The Airports Authority has initiated consultation with the Virginia State Historic Preservation Officer, as documented in the minutes of a February 14, 2006 meeting (Attachment A). During that meeting the Authority was asked to consider the possibility of (1) relocating the Shop 1 Annex building out of the impact area of the IAB expansion, (2) relocating the Shop 1 Annex

Building to a new location on the airport, and (3) salvaging the original exterior metal panels of the Shop 1 Annex for reuse as replacement panels on other original structures. These measures were evaluated and found not to be viable because of the condition of the building (details provided in Attachment B).

Although the preceding steps are not viable, the Authority agrees to carry out recordation by VDHR Intensive Survey Form, as suggested by Mr. Holma in the above meeting minutes from February 14, 2006 as a condition of completing Section 106 requirements.

Further consultation with the VASHPO regarding the modifications to the west doors of the Shop 1 Building occurred in February 2007, as indicated in the email provided in Appendix C. While the minor modification of the western door openings will alter door transoms that appear to be original structural elements of the building, the doors that will be vertically enlarged are not original and the visual impact of the modifications will be minor. As mitigation for the potential effects on historic properties, the Authority has proposed the measures set forth in a Memorandum of Agreement with the Virginia SHPO (Attachment D). This MOA has been executed by the SHPO, the Airports Authority, and FAA.

All other design characteristics of the IAB Expansion will be in compliance with the Authority Design Manual 'Historic Compliance' guidelines, and blended into the correct design context from the original Saarinen design elements original to the surrounding airport design (page 25, Authority Design Manual, 2006).

(b) Describe whether there is reason to believe that significant scientific, prehistoric, historic, archeological, or paleontological resources would be lost or destroyed as a result of the proposed project. Include a record of consultation with persons or organizations with relevant expertise, including the SHPO, if applicable.

Because of prior disturbance of the project site, there are no intact archaeological resources that could be affected.

#### (9) BIOTIC COMMUNITIES

Describe the potential of the proposed project to directly or indirectly impact plant communities and/or the displacement of wildlife. This answer should also reference Section 6, Water Quality, if jurisdictional water bodies are present. None

#### (10) FEDERAL and STATE-LISTED ENDANGERED AND THREATENED SPECIES

Would the proposed project impact any federally- or state-listed or proposed endangered or threatened species of flora and fauna, or impact critical habitat? Explain, and discuss and attach records of consultation efforts with jurisdictional agencies, if applicable.

Three species, the upland sandpiper (VA State threatened species), the hairy beardtongue and marsh hedgenettle (both designated very rare by the Virginia Natural Heritage Program) have been either observed or documented at or near IAD. Activities from the implementation of the proposed project will occur within the built-up airport terminal area, which is well out of range of these species. The proposed action will not have an impact on any known or suspected threatened or endangered species or critical habitat.

#### (11) WETLANDS

Does the proposed project involve the modification of delineated wetlands (wetlands must be delineated using methods in the US Army Corps of Engineers (ACE) 1987 Wetland Delineation Manual; delineations must be performed by a person certified in wetlands delineation). Provide justification for your response.

No. There are no wetlands present at the project site. Neither the proposed action no the No-Build alternative will affect wetlands.

#### (12) FLOODPLAINS

(a) Would the proposed project be located in, or would it encroach upon, any 100-year floodplains, as designated by the Federal Emergency Management Agency (FEMA)? Yes
No_X
(b) Would the proposed project be located in a 500-year floodplain, as designated by FEMA? YesNoX
(c) If "yes," is the proposed project considered a "critical action", as defined in the Water Resources Council Floodplain Management Guidelines? (see <u>FR</u> Vol. 43, No. 29, 2/10/78) Yes No Not Applicable.
(d) You must attach the corresponding FEMA Flood Insurance Rate Map (FIRM) or other documentation showing the project area. Map attached? Yes X See Figure 2 No If "no," why not?
(e) If the proposed project would cause an encroachment of a base floodplain (the base floodplain is the 100-year floodplain for non-critical actions and the 500-year floodplain for critical actions), what measures would be taken to provide an opportunity for early public

#### (13) COASTAL ZONE MANAGEMENT PROGRAM

(a) Would the proposed project occur in, or affect, a coastal zone, as defined by a state's Coastal Zone Management Plan (CZMP)? Explain No The proposed project is located in Loudoun County, outside of the state-designated coastal zone.

review, in accordance with Order 5050.4B Table 7-1 and Order 1050.1E paragraphs 9.2c and

(b) If "yes," is the project consistent with the State's CZMP? Explain. If applicable, attach the sponsor's consistency certification and the state's concurrence of that certification. Early coordination is recommended. Not Applicable.

#### (14) COASTAL BARRIERS

9.2g? Not applicable.

Is the location of the proposed project within the Coastal Barrier Resources System, as delineated by the US Fish and Wildlife Service (FWS) or FEMA coastal barrier maps? Explain. \_No.\_\_

#### (15) WILD AND SCENIC RIVERS

Would the proposed project affect any portion of the free-flowing characteristics of a Wild and Scenic River or a Study River, or any adjacent areas that are part of such rivers, listed on the Wild and Scenic Rivers Inventory? Consult the (regional) National Parks Service (NPS), U.S.

Forest Service (FS), or other appropriate federal authority for information. Early consultation is recommended. <u>No</u>

#### (16) FARMLAND

(a) Would the proposed project involve the use of federal financial assistance or conversion of federal government land? Explain No.

(b) If	"yes" w	ould it conve	ert farmland	protected by the	he Farmlan	nd Protecti	on Policy Act	(FPPA)
(prim	e or unic	ue farmland)	to non-agric	cultural uses?	Yes	No	Not Applicab	ole.

(c) If "yes," determine the extent of project-related farmland impacts by completing (and submitting to the Natural Resources Conservation Service) the "Farmland Conversion Impact Rating Form" (NRCS Form AD 1006). Coordinate with the state or local agricultural authorities. Explain your response, and attach the Form AD 1006, if applicable. Not Applicable.

#### (17) ENERGY SUPPLY AND NATURAL RESOURCES

What effect would the proposed project have on energy or other natural resource consumption? Would demand exceed supply? Explain. Letters from local public utilities and suppliers regarding their abilities to provide energy and resources needed for large projects may be necessary.

The proposed expansion of the IAB will require additional energy use to provide water, heating, air conditioning, and electricity. However, no additional central heating and cooling equipment capacity (i.e. from chillers or boilers) will be required since the existing airport Boiler/Chiller Plant has sufficient excess capacity to accommodate the increased load. Overall, the additional energy consumption required by the proposed IAB expansion will not be a significant percent of total airport energy use, and current energy suppliers can meet the additional demand.

Dominion Virginia Power supplies electricity; natural gas is supplied by Commonwealth/Columbia Gas of Virginia, which is a unit of NiSource Inc. These commercial energy companies are the main suppliers of electricity and natural gas to northern Virginia customers, and there would be no problem meeting this modest energy increase.

#### (18) LIGHT EMISSIONS

Would the proposed project have the potential for airport-related lighting impacts on nearby residents? Explain, and, if necessary, provide a map depicting the location of residences in the airport vicinity in relation to the proposed lighting system. No.\_

#### (19) SOLID WASTE

Would the proposed project generate solid waste? Yes <u>X</u> No\_\_\_\_\_ (a)If "yes," are local disposal facilities capable of handling the additional volumes of waste resulting from the project? Explain.

Airport activities currently generate and collect municipal solid waste and hazardous wastes. Construction activities will generate solid waste as well as some fill material. During construction, dumpsters will be located in construction areas for proper onsite management of construction-generated waste. A contracted solid waste disposal company will haul the materials offsite for either land filling or by another appropriate disposal method. Once the proposed project is completed municipal solid waste will continue to be collected for proper disposal by the existing airport services.

<u>NOTE</u>: A sanitary landfill is incompatible with airport operations if the landfill is located within 10,000 feet of a runway serving turbo-powered aircraft, or 5,000 feet of a runway serving piston-powered aircraft. Refer to FAA Advisory Circular 150/5200.33 " Hazardous Wildlife Attractants on or Near Airports," and FAA Order 5200.5B, "Guidance Concerning Sanitary Landfills on or Near Airports."

#### (20) CONSTRUCTION IMPACTS

Would construction of the proposed project: 1) increase ambient noise levels due to equipment operation; 2) degrade local air quality due to dust, equipment exhausts and burning debris; 3) deteriorate water quality when erosion and pollutant runoff occur; 4) or disrupt off-site and local traffic patterns? Explain.

- 1) Noise impacts are expected, but noise impacts are generally localized at the vicinity of the construction site. Construction equipment and vehicles will create localized increases in noise levels, but these temporary noise impacts will not disrupt normal airport operations.

  Noise levels generally dissipate as distance from their origin increases. Distance from the construction site must be considered when evaluating potential noise impacts to land uses adjacent to or nearby the construction areas. All proposed construction activities will take place inside the airport boundary. Overall, the construction phase of this project is expected to create minor and temporary impacts at the project site and in the surrounding area. These impacts will be short-term in nature, lasting for the duration of construction activities. Temporary contractor staging areas will be required throughout the construction process to store and assemble construction equipment and materials.
- 2) Air quality degradation is not expected. Emissions related to construction activities will be temporary and limited to the duration of the proposed project. The State Implementation Plan (SIP) includes an allowance for construction emissions region-wide. Dust control is important for airport construction activities since light reflecting off of dust particles at night may jeopardize aircraft safety. Best Management Practices (BMPs) will be used to keep this to a minimum.
- 3) If uncontrolled, construction activities have the potential to cause erosion and sedimentation that can impact water quality. Erosion control measures required by the Authority Design Manual (2006) will be implemented to minimize offsite transport of soils from the construction areas. The Department of Conservation and Recreation (DCR) published the *Virginia Erosion and Sediment Control Handbook* (Third Edition, 1992) to provide guidance for all state erosion and sediment control programs. It covers basic concepts, design measures, installation, maintenance, plan review procedures and administrative guidelines to support compliance with the Virginia Erosion and Sediment Control Law and regulations. The project will be built with the appropriate erosion and sediment control plans consistent with State Erosion and Sediment Control Law. Contractors will be required to provide an erosion and sediment control plan that complies with the Virginia Erosion and Sediment Control Law (Title 10.1, Chapter 5, Article 4 of the Code of Virginia) and regulations, including the *Virginia Erosion and Sediment Control Handbook*.
- 4) No changes in the level of service of area roads would result. According to MWAA Design Manual Section 2.14 AIRPORT OPERATIONS DURING CONSTRUCTION, paragraph 2.14.1, the authority must safely conduct airport operations during the construction phase of the project. The project will be designed to consider passenger check-in, security screening, passenger departures, and passenger arrivals. The design will consider the continued operational needs of Airport Operations, airlines tenants, and concessionaires. Additionally it will ensure the continuity of services, maintenance of vehicular access, maintenance of pedestrian access,

and security and safety requirements. During the construction period, construction-related vehicles will be traversing the airport access roads and internal roadways to deliver materials and equipment and to transport construction workers to their job sites. Large or bulky construction equipment that is slow moving could temporarily congest roadway traffic. This congestion is likely to be intermittent and infrequent. This increase in roadway use will be managed to avoid impact to normal airport operations. The access roads and internal roadways may experience a slight increase in traffic volume; the increase should be easily accommodated on the existing roadways. The Authority will incorporate the provisions of Advisory Circular (AC) 150/5370-10A, standards for Specifying Construction of Airports, into the project specifications. This AC provides information to reduce airport-related construction impacts.

#### (21) OTHER CONSIDERATIONS

- (a) Is the proposed project likely to be highly controversial on environmental grounds? Explain. No. See Section 11.\_\_
- (b) Is the proposed project likely to be inconsistent with any federal, state or local law or administrative determination relating to the environment? Explain. No
- (c) Is the proposed project reasonably consistent with plans, goals, policies, or controls that have been adopted for the area in which the airport is located? Explain. Yes. The proposed project is consistent with the following:
- Federal Aviation Administration (FAA) Metropolitan Washington Airports. *Master Plan Update Washington Dulles International Airport*. Final Technical Report. Prepared by: Peat, Marwick, Mitchell & Co. September 1985.
- Metropolitan Washington Airports Authority, *Addendum, Part 150 Noise Compatibility Program*, Washington Dulles International Airport, 1993.
- Metropolitan Washington Airports Authority (MWAA), Consolidated Pollution Prevention Plan, Washington Dulles International Airport. Prepared by URS Corporation, Bethesda, MD. 2002.
- Metropolitan Washington Airports Authority (MWAA), *Programmatic Memorandum of Agreement Among the Advisory Council on Historic Preservation*, the Virginia State Historic Preservation Officer, and the Federal Aviation Administration Metropolitan Washington Airports. 1987
- Metropolitan Washington Airports Authority (MWAA) Stormwater Pollution Prevention Plan, Washington Dulles International Airport. Prepared by Earth Tech, Inc, Alexandria, VA and revised by Dames & Moore, Inc. Bethesda, MD. January 2000.
- Metropolitan Washington Council of Governments, Plan to Improve Air Quality in the Washington, DC-MD-VA Region, State Implementation Plan (SIP) ("Severe Area SIP") for Washington, DC-MD-VA Ozone Nonattainment Area, Publication Number: 20047177, February 19, 2004

#### (22) HAZARDOUS SITES/MATERIALS

Would the proposed project require the use of land that may contain hazardous substances or may be contaminated? Explain your response and describe how such land was evaluated for hazardous substance contamination. Early consultation with appropriate expertise agencies (e.g., US Environmental Protection Agency (EPA), EPA-certified state and local governments) is recommended. The land for the footprint of the IAB Expansion has been previously disturbed with a variety of aviation-related activities. The proposed project does not involve any Solid Waste Management Units or areas of concern that are the subject of RCRA Corrective Action. Any hazardous material encountered throughout project activities will be disposed of in accordance with applicable laws and regulations.

#### (23) PERMITS

List all required permits for the proposed project. Indicate whether any difficulties are anticipated in obtaining the required permits. Add backup generator to the air quality permit:

No Difficulty, see section (5)(b), Erosion and sediment control plan reviewed and approved by the Authority's Building Codes/Environmental Department: No Difficulty, see item (6).

NOTE: Even though the airport sponsor has/shall obtain one or more permits from the appropriate federal, state, and/or local agencies for the proposed project, initiation of such project shall NOT be approved until FAA has issued its environmental determination.

#### (24) ENVIRONMENTAL JUSTICE

Would the proposed project impact minority and/or low-income populations? Consider human health, social, economic, and environmental issues in your evaluation. Explain. No.

#### (25) CUMULATIVE IMPACTS

When considered together with other past, present, and reasonably foreseeable future development projects on or off the airport, federal or non-federal, would the proposed project produce a cumulative effect on any of the environmental impact categories above? You should consider projects that are connected, cumulative and similar (common timing and geography). Provide a list of such projects considered. For purposes of this Evaluation Form, generally use 3 years for past projects and 5 years for future foreseeable projects.

No. Cumulative impacts are substantive changes in the environment that would result from implementation of the proposed project and other development projects in the vicinity. The Authority plans to continue implementation of the following projects in the vicinity of the proposed IAB Expansion: *Modifications to the West Baggage Basement* to install a permanent In-Line Explosion Detection System (EDS): Installation of an in-line EDS potentially impacts the baggage recheck operation for international passengers connecting to other flights by removing the TSA baggage inspection area from the airline recheck lobby. While the proposed project does not include such modifications, the design should consider future implications to the exit flow from the facility as well as implications to the baggage basement rooms. Automated People Mover (APM): The location for the Mobile Lounge docks will require coordination with the APM construction plans in the area immediately south of the IAB. Currently plans call for the APM project to remove a temporary ramp and immediately construct a permanent ramp that facilitates future construction of the West Z-Gates and a service road to the Main Terminal Mobile Lounge docks. The designer may be asked to explore options for this ramp to remain a permanent configuration, designed to pass under the West Z-Gate facility. West Z-Gate Expansion: Construction of the West Z-Gate will require the relocation of the

<u>IAB's temporary Mobile Lounge Docks into their permanent location and coordination of the temporary tug ramp to the West and Southwest Baggage Basements.</u>

Southwest Baggage Basement: The design of the IAB will coordinate the alignment of the new tug ramp accessing the new international inbound baggage basement with the latest plans for the main tug ramp proposed for the southwest baggage basement.

Sterile Tunnel from Concourse B to the IAB and Modifications to Concourse B: As international traffic demand increases, and with the desire to remove mobile lounge activity from the airfield, implementing a sterile tunnel connection between the IAB and Concourse B could improve levels of service to select concourse gates. To allow passengers to walk from Concourse B to the IAB via the sterile tunnel, modifications would be required for Concourse B. Although neither project has been officially adopted, they remain attractive options for the future.

Construction and operation of the IAB Expansion could cause environmental effects that would add to the expected environmental impacts of other development projects in that area of the Washington Dulles International Airport. Cumulative effects that may occur include increased air emissions from vehicles, higher noise levels, and additional vehicular traffic. The IAB Expansion project, including the demolition of the Shop 1 Annex would generate air emissions from use of vehicles and equipment at the site during construction and from use of vehicles to operate and maintain the IAB expansion. Compared with air emissions from vehicle use in the vicinity, the IAB Expansion project would generate a minimal contribution to the current and expected amount of air pollutants from other development. The cumulative impact on air quality would be not be significant and would not result in violation of NAAOS. During construction of the IAB Expansion, noise levels would temporarily increase in the vicinity of the site. Similarly, construction traffic would add to existing traffic volumes on the airport roads. Construction traffic generated by the project would be minor compared with existing traffic levels in the area and to traffic volumes generated by other development. Cumulative noise and traffic impacts from development of the IAB Expansion would not be significant and would amount to only a small portion of the increase in noise and traffic of development. Construction and operation of the IAB Expansion project would not result in significant cumulative effects on the environment.

#### 10. MITIGATION

- (a) Describe those mitigation measures to be taken to avoid creation of significant impacts to a particular resource as a result of the proposed project, and include a discussion of any impacts that cannot be mitigated, or that cannot be mitigated below the threshold of significance (TOS) (See Order 5050.4B). See Section 10(b)
- (b) Provide a description of the resources that are in or adjacent to the project area that must be avoided during construction. **Note:** The mitigation measures should be incorporated into the project's design documents.

Water Quality: Construction activities will follow the *Northern Virginia Best Management*Practices (BMPs) Handbook and Virginia Stormwater Management Handbook. In addition to the management of stormwater runoff, the construction project will be required to have an individual erosion and sediment control plan reviewed and approved by the Authority's Building Codes/Environmental Department. Erosion control measures required by the Authority Design

Manual (2006) will be implemented to minimize offsite transport of soils from the construction areas. The Department of Conservation and Recreation (DCR) published the *Virginia Erosion and Sediment Control Handbook* (Third Edition, 1992) to provide guidance for all state erosion and sediment control programs. The project will be built with the appropriate erosion and sediment control plans consistent with State Erosion and Sediment Control Law. Contractors will be required to provide an erosion and sediment control plan that complies with the Virginia Erosion and Sediment Control Law and regulations, including the *Virginia Erosion and Sediment Control Handbook*.

Historic Resources: The Authority will carry out recordation of the existing Shop 1 Annex (to be demolished) using the VDHR Intensive Survey Form. Design characteristics of the IAB expansion will be in compliance with the Authority Design Manual 'Historic Compliance' guidelines, and blended into the correct design context from the original Saarinen design elements original to the surrounding airport design. (page 25, Authority Design Manual, 2006). Solid Waste: During construction, dumpsters will be located in construction areas for proper onsite management of construction-generated waste. A contracted solid waste disposal company will haul the materials offsite for either land filling or by another appropriate disposal method.

Air Quality: Dust control is important for airport construction activities since light reflecting off of dust particles at night may jeopardize aircraft safety. Best Management Practices (BMPs) will be used to keep this to a minimum. Recognizing that the project is in an area that is non-attainment for ozone, MWAA will take reasonable precautions to limit emissions of the ozone precursors volatile organic compounds (VOCs) and NO<sub>x</sub>

Traffic Flow: According to MWAA Design Manual Section 2.14 AIRPORT OPERATIONS DURING CONSTRUCTION, paragraph 2.14.1, the Authority must safely conduct airport operations during the construction phase of the project. The Authority will incorporate the provisions of Advisory Circular (AC) 150/5370-10A, standards for Specifying Construction of Airports, into the project specifications. This AC provides information to reduce airport-related construction impacts.

<u>Hazardous Materials</u>: Any hazardous material encountered throughout project activities will be disposed of in accordance with applicable laws and regulations.

#### 11. PUBLIC INVOLVEMENT

Describe what efforts would be made to involve the public with this proposed project. Discuss the appropriateness of holding public meetings and/or public hearings, making the draft document available for public comment, or the preparation of a public involvement plan, etc. A Memorandum of Agreement to address and mitigate impacts to historic resources has been executed by the Airports Authority, the Virginia SHPO, and the FAA (Attachment D).

MWAA informed the public of the proposed project by publishing a Public Notice that the Draft EA was available for review and a public comment period. The Public Notice appeared in the Washington Post on March 30, 2007 (proof of publication provided in Attachment E). The Draft EA also was made available to the public in seven public libraries near IAD in Fairfax and Loudoun Counties. MWAA also distributed copies of the Draft EA to Federal, state, and local government agencies. Comments were accepted for a 30 day period ending April 30, 2007. Comments received are presented in Attachment E, and this Final EA has been revised in response to comments received as summarized in Table E-1.

#### **References:**

Federal Aviation Administration, Final Environmental Impact Statement for New Runways, Terminal Facilities and Related Facilities at Washington Dulles International Airport, 2005.

- McCarty, Michael. Memorandum, NEPA Documentation-Shop 1 Annex, Parsons Management Consultants, April 17, 2006.
- Metropolitan Washington Airports Authority (MWAA), Airport Environmental Planning Manual, January, 2006
- Metropolitan Washington Airports Authority (MWAA). Design Manual, Ronald Reagan Washington National Airport and Washington Dulles International Airport, 2006.
- Metropolitan Washington Airports Authority (MWAA). International Arrivals Building Expansion: Enabling Projects Relocation Study for MA-120, 225, 226, 630 and 610, Washington Dulles International Airport, March 20, 2006
- Metropolitan Washington Airports Authority (MWAA). International Arrivals Building Expansion Project Definition Document (PDD), April 5, 2006

12. PREPARER CERTIFICATION I certify that the information I have provided above is, to the best of my knowledge, correct.  Signature  Date
v
Francis A. Cirillo, Jr., Manager, Program Planning
Name, Title
Parsons Management Consultants/Metropolitan Washington Airports Authority Affiliation
13. AIRPORT SPONSOR CERTIFICATION I certify that the information I have provided above is, to the best of my knowledge, correct. I also recognize and agree that no construction activity, including but not limited to site preparation, demolition, or land disturbance, shall proceed for the above proposed project(s) until FAA issues a final environmental decision for the proposed project(s), and until compliance with all other applicable FAA approval actions (e.g., ALP approval, airspace approval, grant approval) has occurred.
Signature 2 1 Part
Signature Date Date
Frank D. Holly Jr., Vice President for Engineering
Name, Title

Metropolitan Washington Airports Authority

Affiliation

#### Note: This page to be completed by FAA only

#### 14. FAA DECISION:

Having reviewed the above information, certified by the responsible airport official, it is the FAA decision that the proposed project(s) of development warrants environmental processing as indicated below.

	The proposed development action has been found to qualify for a <b>Short</b> Environmental Assessment.					
	The proposed development action exhibits conditions that require the preparation of a detailed <u>Environmental Assessment</u> (EA).					
	The following additional documentation is necessiries environmental evaluation of the proposed projection.	• •				
*Action Revi	iewed/Recommended by:					
	(FAA Environmental Specialist)	Date				
*Approved:						
	(FAA Approving Official)	Date				

The above FAA approval only signifies that the proposed development action(s), as described by the information provided in this Evaluation Form, initially appears to qualify for the indicated environmental processing action. This may be subject to change after more detailed information is made known to the FAA by further analysis, or though additional federal, state, local or public input, etc.

#### **FIGURES**

- Figure 1. Washington Dulles International Airport (IAD) General Location Map
- **Figure 2**. Project Area for IAB Expansion Area and Demolition of Shop 1 Annex, Washington Dulles International Airport (IAD)
- Figure 3. International Arrivals Building (IAB) Site Plan and Associated Projects
- Figure 4. Artist's Rendering of International Arrivals Building with Proposed Expansion
- **Figure 5.** Alternatives to International Arrivals Building (IAB)

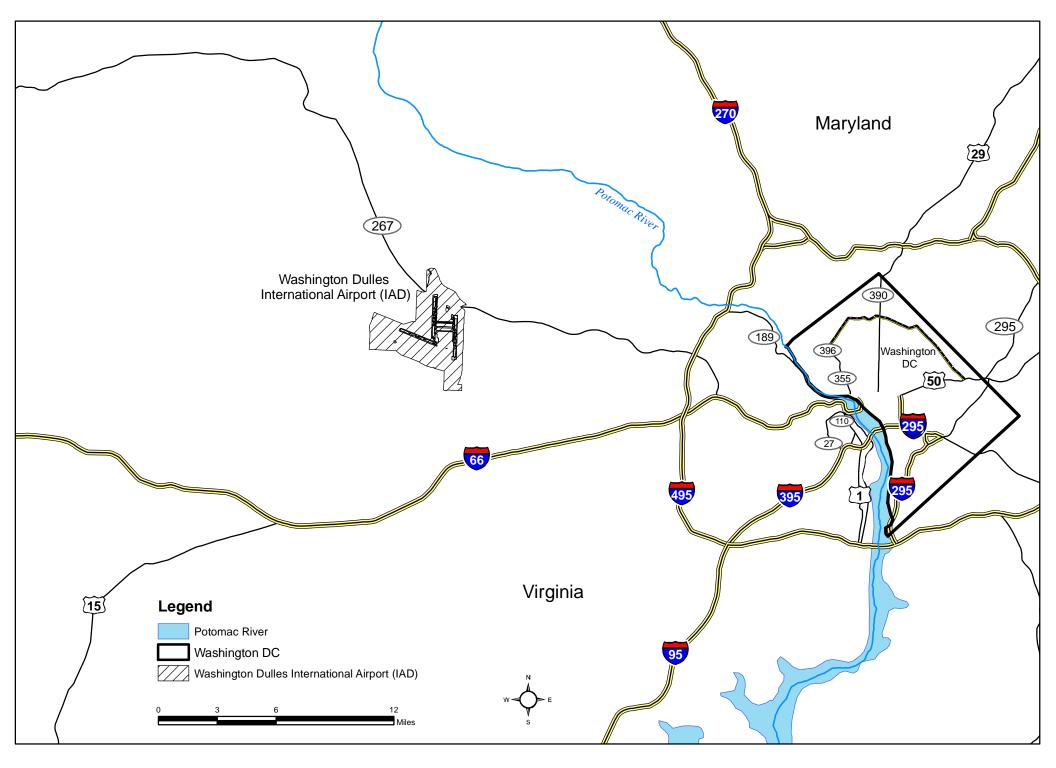


Figure 1. Washington Dulles International Airport (IAD) General Location Map

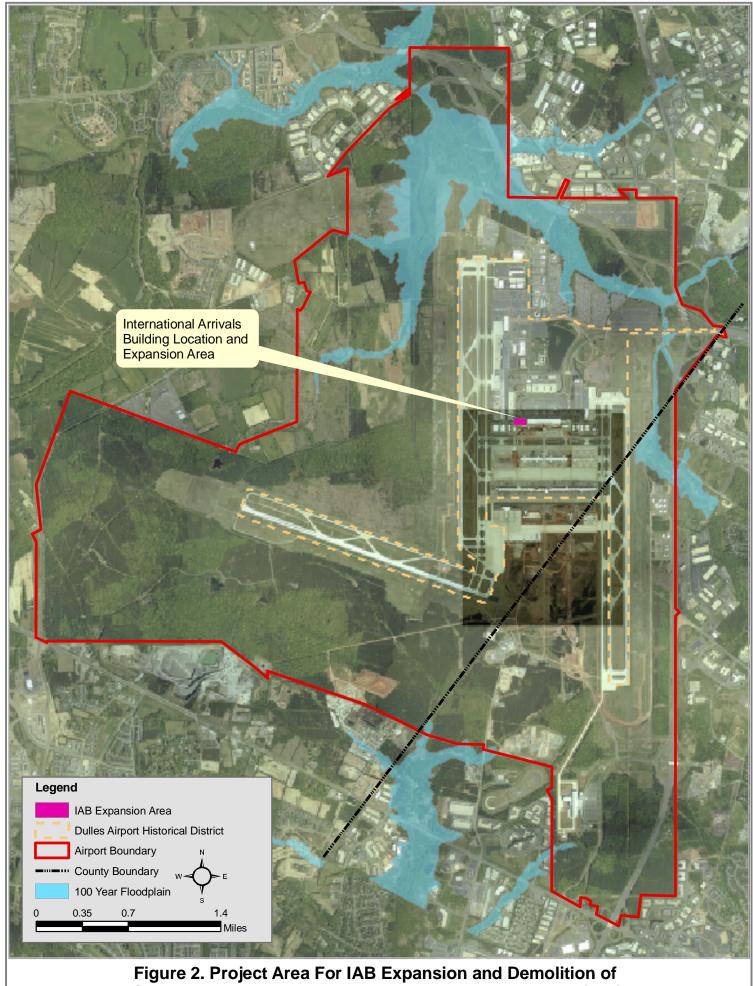


Figure 2. Project Area For IAB Expansion and Demolition of Shop 1 Annex, Washington Dulles International Airport (IAD)

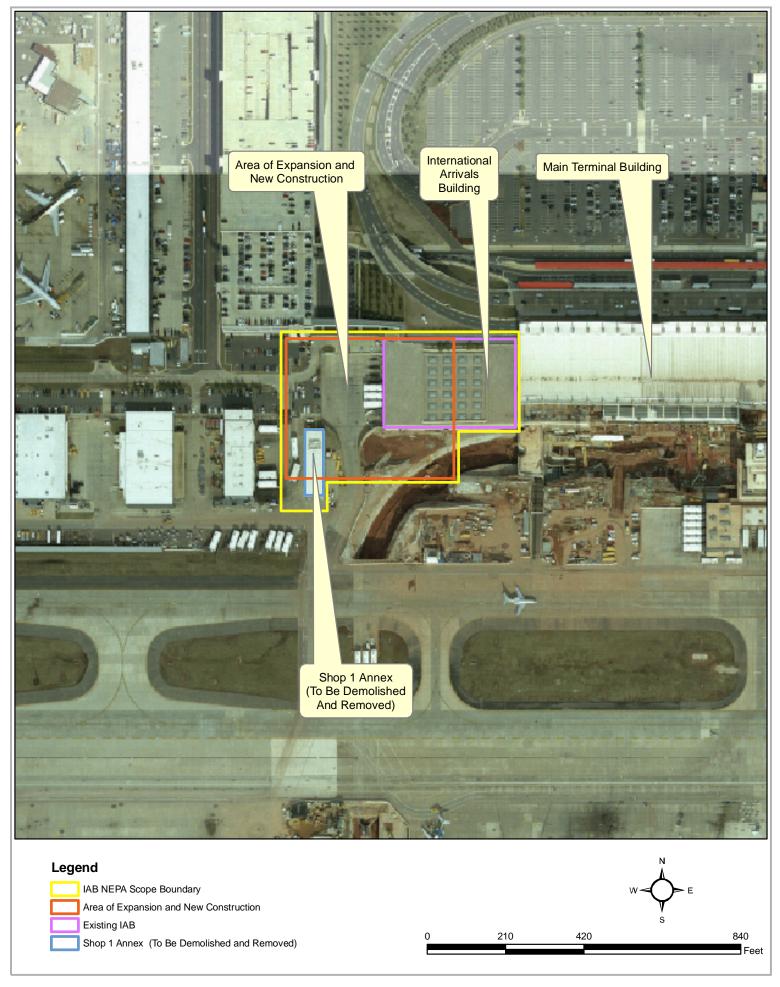
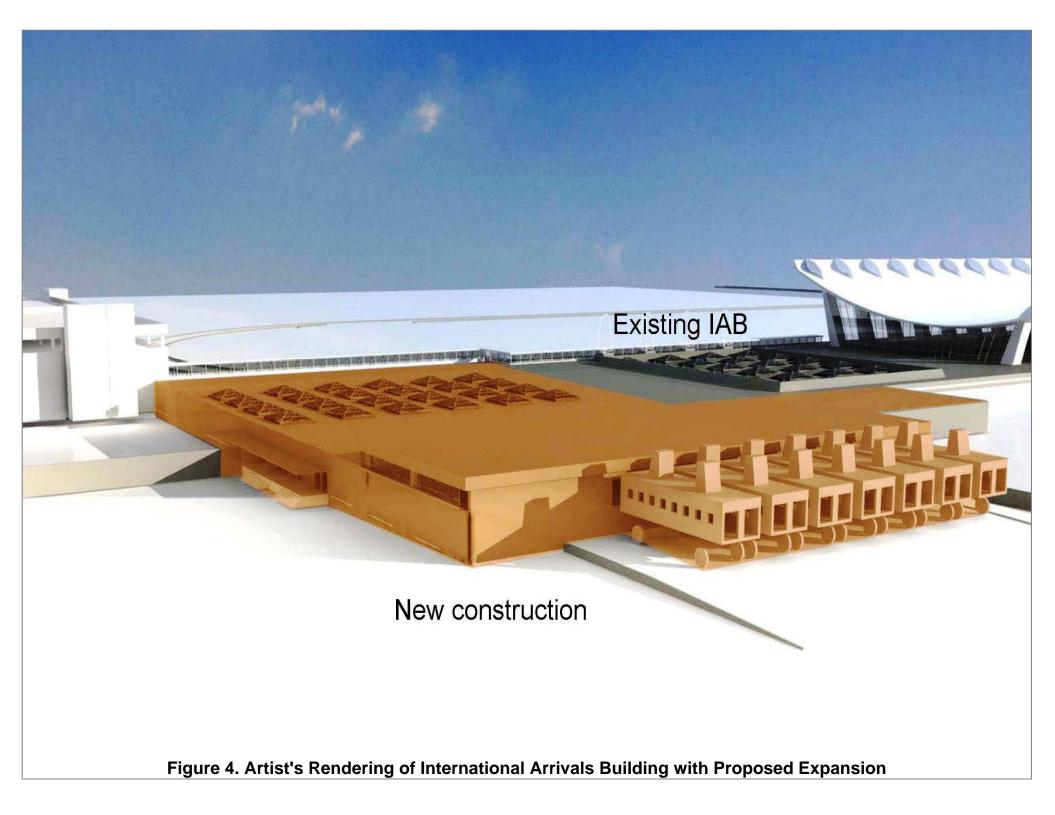


Figure 3. International Arrivals Building (IAB) Site Plan and Associated Projects



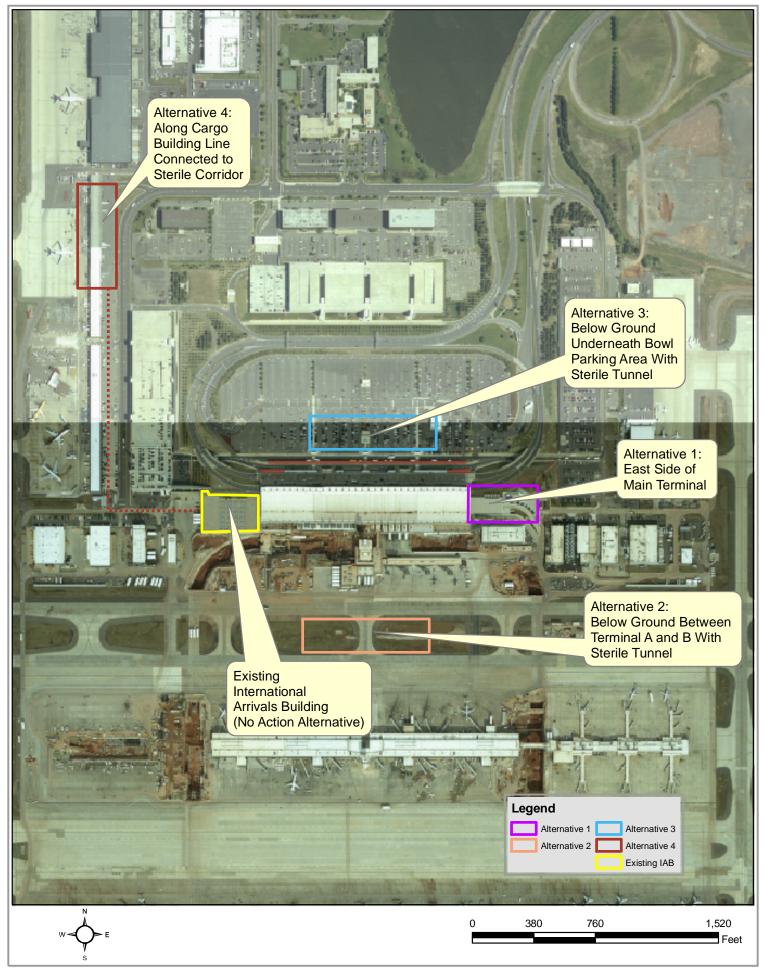


Figure 5. Alternatives to International Arrivals Building (IAB)

#### **ATTACHMENTS**

- A. Excerpt from Minutes of February 14, 2006 Meeting Between the Metropolitan Washington Airports Authority and the Virginia Department of Historic Resources
- B. Technical Memorandum, Shop 1 Annex Building, by Mike McCarty [Parsons Management Consultants], April 17, 2006
- C. E-Mail from Henry Ward to Marc Holma Concerning Additional Modifications to West Service Buildings, February 28, 2007
- D. Memorandum of Agreement between the Virginia State Historic Preservation Office and the Metropolitan Washington Airports Authority
- E. Comments Received Regarding the Draft Environmental Assessment

#### ATTACHMENT A

Excerpt from Minutes of February 14, 2006 Meeting Between the Metropolitan Washington Airports Authority and the Virginia Department of Historic Resources

#### "International Arrivals Building Expansion

Dick Whiteley, [Architect/Project Manager], provided an overview of the proposed expansion/rehabilitation of the International Arrives Building, including Project Requirements and Construction Phasing. During the discussion it was explained that there was a compelling need to expand the existing facility, and that site limitations required that this expansion occur to the west, resulting in potential impacts to the original West Service Buildings.

Henry Ward [Authority Archeological and Historic Preservation Coordinator] went on to explain that the proposed project would require the demolition of the existing Shops 1 Annex, which represented the airports original Aircraft Rescue and Fire Fighting Facility. As one of the original Saarinen designed service buildings, this facility had been identified as a contributing element of the National Register eligible Dulles Airport Historic District. Mr. Holma [Virginia State Historic Preservation Officer representative] agreed that the removal of the building and the alteration to the architectural character of the West Service Building complex would represent an Adverse Effect, but that the visual impact to the Main Terminal forecourt and approach roadways would be limited by the location of the project behind the terminal approach ramps.

Mr. Holma proceeded to raise a number of suggested steps which would be considered to help mitigate the loss of the original structure including:

- 1) Potential relocation of the facility out of the impact area of the IAB expansion
- 2) Relocation of the facility to a new location on the airport
- 3) Potential salvage of the facilities character defining structural elements (exterior metal panels) to be available for future use as replacement panels on other original structures.

Although it was agreed that these steps would still result in the loss of original historic context, these steps would help to reduce the magnitude of the adverse effect. The discussion then turned to other potential mitigation measures, and Mr. Holma suggested that historic architectural documentation (either Historic American Engineering Record or VDHR Intensive Survey Form) would be more effective if it included a broader focus on the West Service Building and their relationship with the Main Terminal, rather then being limited to the Shops 1 Annex. The Authority staff thanked Mr. Holma for his suggestions and agreed that they would explore and provide a discussion of these options in the eventual formal submission."

#### **ATTACHMENT B**

### Technical Memorandum, Shop 1 Annex Building, by Mike McCarty [Parsons Management Consultants], April 17, 2006

#### "International Arrivals Building: Shop 1 Annex Memorandum

The westerly expansion of the International Arrivals Building (IAB) at the Dulles International Airport (IAD) requires that the Maintenance Shop One Annex (Building 2409) be removed and its existing tenants relocated. Among the options considered by the Metropolitan Washington Airports Authority for the Shop 1 Annex was its dismantling and relocation to another site in order to preserve its historical value. Close inspection of the facility revealed that this was not a viable option for the following reasons.

- Corrosion and metal fatigue have significantly deteriorated the metal exterior panels making many unsalvageable.
- The exterior metal panels are fastened in a way that will require them to be cut away from the structure through the use of a blowtorch. In doing so the shape and size of the panels will become irregular and not readily reusable.
- The building's exterior, as well as much of the interior areas, has been exposed to lead paint requiring that all building parts be carefully sand blasted and cleaned. The age and condition of the exterior panels do not lend themselves to surviving this process in whole or part.
- There are other parts of the building that will have to be disposed of in whole or in part due to environmental concerns. Examples include the exterior building lights which contain PCB materials and the exterior window frames which have been exposed to lead paint and glazing with asbestos base materials.
- The building architectural structure and design is not consistent with [materials used on] any building currently under design or planned for the foreseeable future. It is not prudent or feasible to salvage Building 2409 materials so that they may be "blended" into another building for historical preservation purposes.
- Over the years the building has undergone numerous modifications including the addition of oversized exterior maintenance doors and interior fit-outs. It would be difficult to recreate an exact duplicate of the original building with materials in place today."

#### ATTACHMENT C

#### E-Mail from Henry Ward to Marc Holma Concerning Additional Modifications to West Service Buildings, February 28, 2007

From: Ward, Henry

Sent: Wednesday, February 28, 2007 6:45 PM

To: 'Holma, Marc'

Cc: Kleinman, Robert; Whiteley, Dick; Cortijo, Carlos; McCarty, Michael; Carvajal, Miguel;

Baummer Jr., Charley: 'straum@johnmilnerassociates.com'; PMC Mail Design

Engineering

**Subject:** Additional Information on Modifications to West Service Buildings (HS500 PRJ.2)

Attachments: Shop 1 Modifications.pdf

Marc:

After our delayed identification of the need to modify the doors on the AMF, we carefully went through the entire suite of projects related to the expansion of the International Arrival Building, to see if there were any other potential impacts.

During this process, we identified another issue which could result in minor modifications to one of the another of the original West Service Buildings.

During the construction of the IAB construction, the security fencing around the construction site will result in the blockage of the vehicle maintenance bay doors on the east side of the Shop 1 Building (where the airfield shuttle fleets on Mobile Lounges and Plane-Mates are serviced).

This situation will continue through the duration of the construction project, so the access will be blocked through 2010.

The Shop 1 Building is another one of the original service building and is located between the Shop 1 Annex and the Air Mail Facility.

Like the other buildings, it is a contributing element of the airport historic district.

In order to allow both the Mobile Lounges and Plane-Mates (which have a higher vehicle clearance) to enter all the east bay doors - it would be necessary to increase the height (but not the width) of a number of existing doors.

All of the west doors have already been replaced, but three of these doors openings have fixed metal transoms (with a window insert and obsolete floodlight fixture) that where left in place - when the original doors where replaced.

Although there is some evidence that these existing transoms may also have been modified - or even replaced - it is probable that they do represent original 1961 fabric.

As a result, we assume that the removal of these transom panels to allow the installation of the new higher door, would constitute an adverse effect.

It is our recommendation that we include this additional impact into the IAB MOA (as it is directly related to that project), and provide the same mitigation treatment that we have agree to for the other west service buildings (Intensive Survey Field Form).

As with the AMF modifications, the goal of this project is to allow the West Service Buildings to continue to serve important airfield service function.

And, as with the AMF, the modification will result in the removal of relatively minor portions of the original structure, but will leave the original architectural character of the structure and the surrounding historic district essentially unchanged.

I have attached a document with a more detailed description and illustration of the proposed Shop 1 modification.

After your review, we are hoping that you will agree that the inclusion of this undertaking in the IAB MOA and mitigation plan is appropriate.

Once I have received you concurrence with this approach, we will modify the IAB consultation documentation and submit them for your formal review.

In the meantime, we are moving forward with the recordation process and anticipate that the Intensive Survey Field Form (for all four of the West Service Buildings) should be complete and ready for submission in March.

Related to the architectural survey, I would like to clarify the photographic requirements.

I checked the Survey Guideline document on the VDHR website, and it provided a good deal of information on both B/W print/negatives and color slides, but did not make any mention of digital photography.

I noted that the guidelines were updated in 2003 - but want to make sure that had not been an additional guidance developed for the use of digital photography.

Please feel fee to contact me if you have any questions - and I hope to here back from you soon on your response to our approach on the Shop 1 door modifications.

I am sorry that we seem to be coming up with "just one more issue" - but I am confident that we have been through each aspect of the project and that there are no more surprises.

As always, I can be reached by cell (410-925-6730) or PDA (wardhe@pbworld.com).

Thanks for you continued assistance and cooperation.

#### Henry Ward

Archaeology/Historic Preservation Coordinator Parsons Management Consultants 45045 Aviation Drive, Suite 300 Dulles, VA 20166-7528 410-925-6730 (Cell) 703-572-1198 (Fax) henry.ward@mwaa.com

Note: The e-mail has been automatically uploaded into the PMC Electronic Document Control system under the Historic Preservation PUID (HS500) filing structure. If you would like this documentation to be filed under an additional project specific PUID file - please forward your request to EDC.

## Proposed Modification of Shop 1 Building Washington Dulles International Airport

#### Project Background

- 1) The existing Shop 1 Building, used to service the Mobile Lounge and Plane-Mate airfield shuttle fleets, is located to the west of the Main Terminal at Washington Dulles International Airport (Figure 1 & Figure 2).
- 2) This structure, along with the other West Service Buildings (Figure 3), has been determined to be contributing elements to the Dulles Airport Historic District (which has been determined to be eligible for the National Register of Historic Places).

#### Purpose and Need

- 1) During the construction related to the proposed expansion of the International Arrival Building, the doors on the east side of the existing Shop 1 Building will not be able to be used for a considerable period of time (approximately until 2010).
- As a result, all vehicle access to the maintenance bays in Shops 1 will need to occur through the overhead doors on the west side of the building (Figure 3).
- 3) In order to allow all of the doors and all of the maintenance bays to be able to be used for both the historic Mobile Lounges as well as the later and taller Plane-Mate vehicles (Figure 4), all of the west doors would need to have a clearance height of (24' 6").
- 4) As a number of the west doors do not currently have this clearance, the Authority is proposing modifications to the structure to allow doors of sufficient height to be installed in all of the west door openings.
- 5) One of the original door openings on the west side of the building has already been modified (Door 1 on Figure 8), and one non-original door with a similar transom to the original doors has also been modified (Door 5 on Figure 8)

#### **Existing Conditions**

- 1) None of the doors on the west side of the building represent original overhead doors, all of the original 1961 doors have already been replaced
- 2) The original doors were of wooden construction and had a central vertical band of window inserts (Figure 5 As Built Plans dated April 14 1961).

- 3) The current doors represent two different variety's fiberglass replacement doors, one with a horizontal band of windows (dark colored door in Figure 6, and one with no windows (light colored door in Figure 6).
- 4) However three of the existing doors (Doors 2,3 and 4) appear to have fixed transom panels above the doors that are similar to the panels that are shown in the originally 1961 design for the structure
- 5) The existing door transoms exhibit a number of discrepancies from the original design, which suggested that they might represent later additions or modifications of the original transoms:
  - a. The design calls for a solid fixed metal panel with clearly incised horizontal scribe lines to replicate the pattern of the segmented overhead doors:
  - b. The existing doors, are clearly constructed from a series of welded plates and do not exhibit any horizontal scribe lines (Figure 7a);
  - c. The transom over Door 5 (Figure 7b), which is not one of the original doors show in the 1961 plans, appears identical with the transoms for the original openings for Doors 2, 3 and 4, (the transom over the opening of the original Door 1 was removed when this door was replaced in 1972).
- 6) However, these three transoms do exhibit a number of basic features shown on the original transom plans:
  - a. The central spotlight fixture (now non-operational);
  - b. Two horizontal window inserts (most replaced by metal inserts)
- 7) Although careful examination of the existing doors, design documentation and historic photography has been unable to determine if the existing transom panels are original, it seems more likely that they do represent original building features.
- 8) As the modification necessary to increase the west door openings would require the removal of the transom panels, the modification would constitute an adverse effect on a contributing element of the historic district.

#### Conclusions

 The proposed minor modifications to the western door openings is necessary to allow the Shops 1 Building to continue to perform its original function of servicing the airfield shuttle fleets, during the significant period Modification of Shop 1 Doors Washington Dulles International Airport Page 3 of 3

when adjacent construction will block the access to the east side of the building,

- 2) The visual appearance of the modified Shop 1 building would be very similar to the original building plans, were the horizontally scribed transom panels were intended to give the impression of segmented doors extending from the apron pavement to the building parapet (Figure 8).
- 3) The replacement of the existing non-original doors will allow, for all the doors to have a consistent and balanced appearance.
- 4) As the plans for the IAB Expansion already includes the historic recordation of the all four original west Service Buildings, this element of an appropriate mitigation treatment has already been developed.
- 5) As the modification of Shop 1 is directly linked to the expansion of the IAB, it would appear to be reasonable to include the potential effects and mitigation treatment as an element of the Memorandum of Agreement developed for the IAB Expansion.

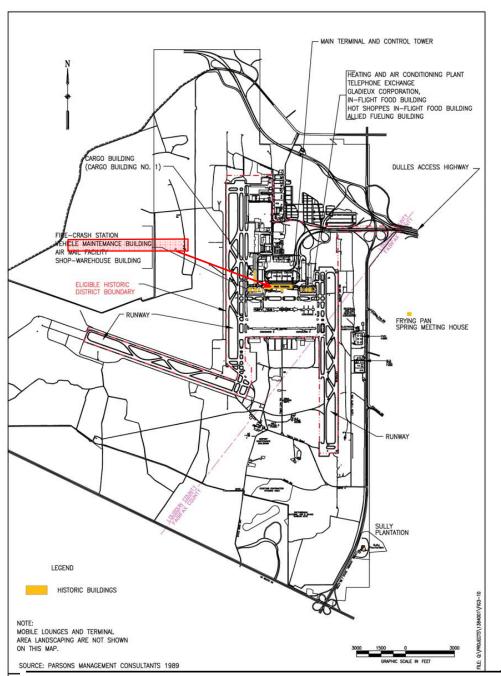


Figure 1: Project Location – IAD Shop 1 Building (Historic District and Properties Shown)

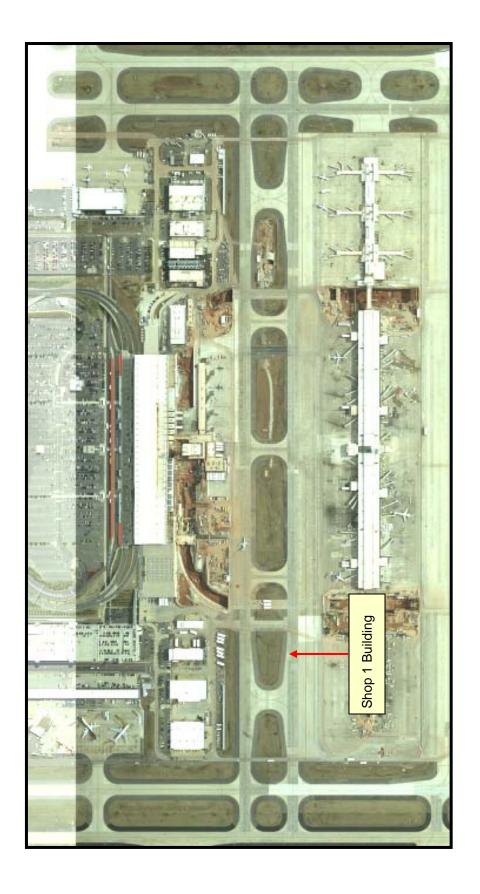


Figure 2: Shop 1 Facility (Showing Location Relative to Main Terminal and West Flank Service Structures)

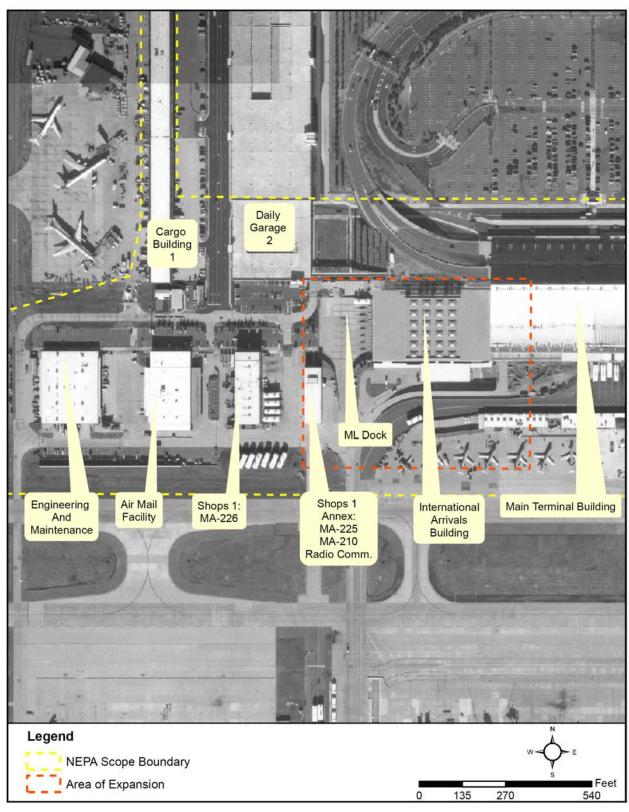


Figure 3: West Service Buildings

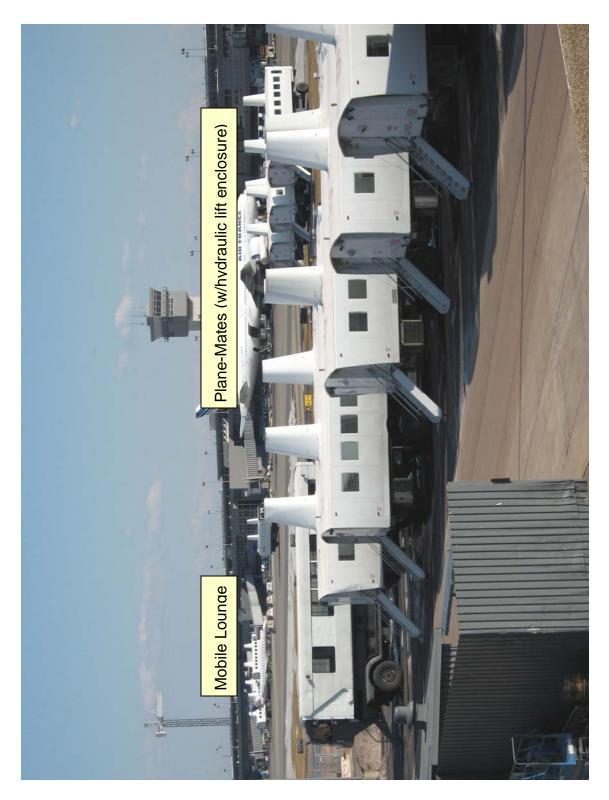


Figure 4: Mobile Lounge and Plane-Mates

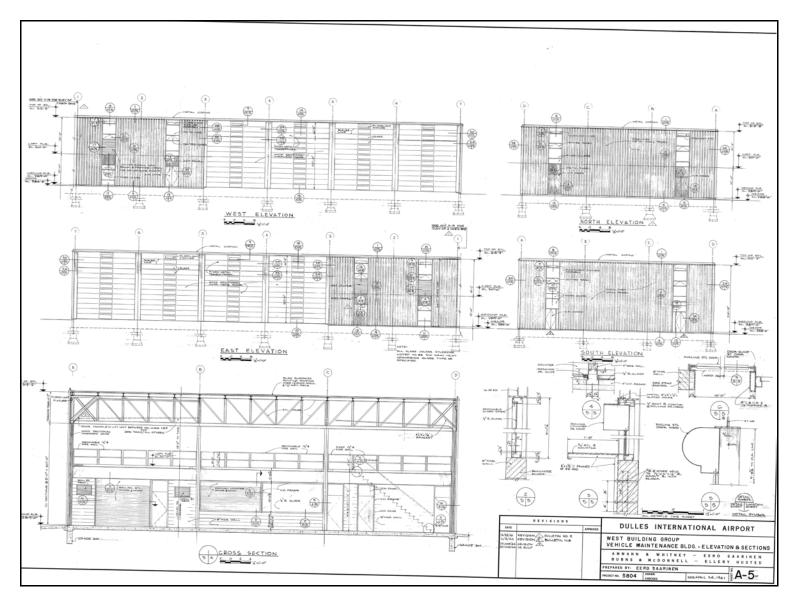


Figure 5: Shop 1 Building (1961 - As Built Plans)



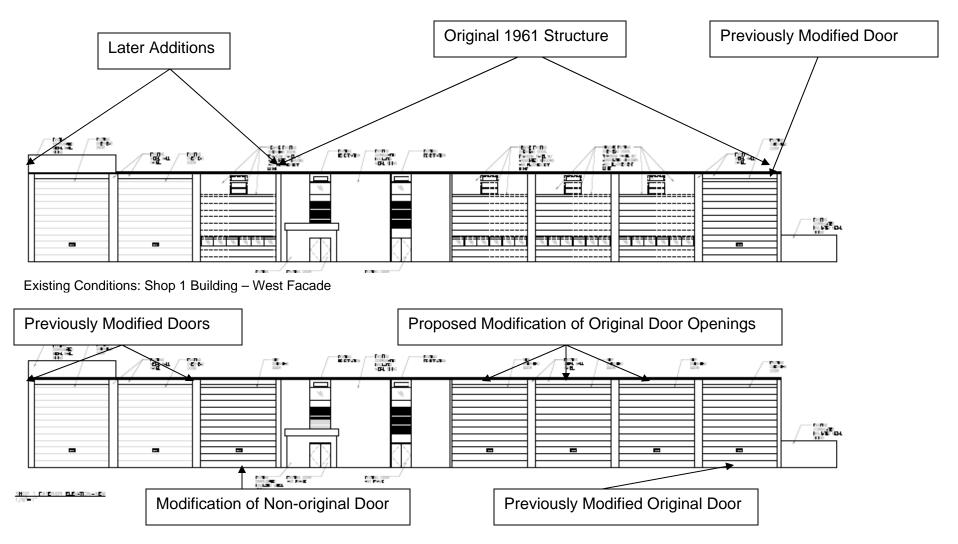
Figure 6: Shop 1 Building (Showing both sets of replacement doors)



Figure 7a: Shop 1 Building (Showing details of original Door 4 transom)



Figure 7b: Shop 1 Building (Showing details of non-original Door 5 transom)

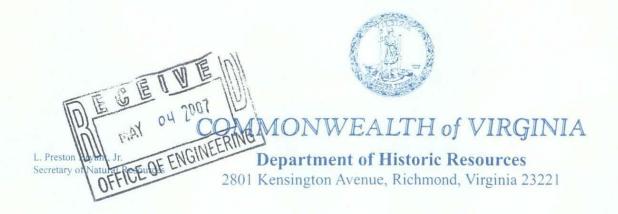


Proposed Modification: Shop 1 Building – West Facade

Figure 8: Proposed Modifications to Shop 1 Doors - West Facade

## ATTACHMENT D

Memorandum of Agreement between the Virginia State Historic Preservation Office and the Metropolitan Washington Airports Authority



Kathleen S. Kilpatrick Director

Tel: (804) 367-2323 Fax: (804) 367-2391 TDD: (804) 367-2386 www.dhr.virginia.gov

April 30, 2007

Mr. Frank D. Holly, Jr. Metropolitan Washington Airports Authority Ronald Reagan Washington National Airport Washington, DC 20001-4901

Re: Memorandum of Agreement (MOA) for International Arrivals Building Expansion

Washington Dulles International Airport

Fairfax and Loudoun Counties

DHR File # 2006-1905

Dear Mr. Holly:

Enclosed please find the signed original copy of the Memorandum of Agreement (MOA) for the above referenced project. Please provide the Department of Historic Resources (DHR) with a copy of the fully executed agreement when available.

If you have any questions about our comments, please call me at (804) 367-2323.

Sincerely

Marc Holma, Architectural Historian Office of Review and Compliance

# MEMORANDUM OF AGREEMENT BETWEEN THE VIRGINIA STATE HISTORIC PRESERVATION OFFICE AND THE METROPOLITAN WASHINGTON AIRPORTS AUTHORITY FOR THE INTERNATIONAL ARRIVALS BUILDING EXPANSION WASHINGTON DULLES INTERNATIONAL AIRPORT

WHEREAS, the Metropolitan Washington Airports Authority (Authority), the Virginia State Historic Preservation Officer (SHPO) and Advisory Council on Historic Preservation (Council) executed a Programmatic Memorandum of Agreement (PMOA) on June 1, 1987 relating to the transfer of control over Washington National (now Reagan National) and Washington Dulles International Airports from the Federal Aviation Administration (FAA) to the Authority, and;

WHEREAS, the PMOA governs the handling of airport projects which may have an effect on properties eligible for inclusion in the National Register of Historic Places and provides that such projects will be handled in accordance with 36 CFR 800 with respect to review by the SHPO and the Council;

WHEREAS the Authority proposes to structurally expand the existing International Arrivals Building (IAB), to provide additional capacity for required Immigration and Naturalization Services and U.S. Customs Service functions, and;

WHEREAS the Area of Potential Effect (APE) for the undertaking was established in consultation with the SHPO, and has been determined to include the location of the Shop 1 and Shop 1 Annex and the surrounding area of the Main Terminal, the West Service Buildings complex as well as viewsheds from the airport roadway system, and;

WHEREAS, the Authority, in consultation with the SHPO pursuant to the PMOA, has determined that the proposed expansion of the International Arrivals Building (IAB) will result in adverse effects to contributing resources to the Dulles Airport Historic District (eligible for the National Register of Historic Places), including modification to the existing doors of Shop 1 and the demolition of the Shop 1 Annex Building, and;

WHEREAS, the Authority has invited the Advisory Council on Historic Preservation (Council) to participate in this consultation, and the Council has declined to participate, and:

WHEREAS, the FAA has elected to participate in the consultation and has been invited to concur with the terms of this Memorandum of Agreement, and;

WHEREAS, the Authority has developed a plan, in consultation with the SHPO, to inform and involve the public in Section 106 review through the NEPA public information process related to the development of a IAB Expansion Environmental Assessment and, pursuant to 36 CFR 800.2(d), shall specifically invite comments on the Section 106 process from previously identified potential Interested Parties; and shall take these public comments into account in the development of the final project plans;

NOW, THEREFORE, the Authority and the SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on the historic property;

#### **Stipulations**

#### Stipulation 1: Shop 1 and Shop 1 Annex

The Authority shall ensure that the following stipulations are met:

- 1.1) The Authority shall complete an analysis of alternative treatments to avoid or minimize the adverse effect on the Shop 1 and Shop 1 Annex and demonstrate that there are no feasible alternative treatments.
- 1.2) The Authority shall produce no later than 12 months after the execution of this agreement a historic architectural documentation to the standards of the Department of Historic Resources (which in Virginia is the SHPO) Intensive Survey Form of the Shop 1 and the Shop 1 Annex as well as the other West Service Buildings. This documentation shall include a historic context study that discusses the architectural relationship of these original service structures to the original Erro Saarinen Dulles Airport Master Plan. The Authority shall ensure that all documentation is completed and accepted by the VDHR prior to construction activities which may directly affect the Shop 1 Building, Shop 1 Annex or other West Service Building.
- 1.3) The IAB Expansion will be responsive to the historic and architectural qualities of the Dulles Airport Historic District, and take into consideration the recommended approaches to rehabilitation and new construction set forth in the Secretary of the Interior's <u>Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings</u> (U.S. Department of the Interior, National Park Service, 1992).
- 1.4) The Authority will provide the SHPO the opportunity to review and comment upon the IAB project design as they are developed at the 30%, 60%, and 90% stages. The Authority will take the comments of the SHPO into account in the continued development of the final project plans and specifications.

#### **Stipulation 2: Professional Qualifications**

The Authority shall ensure that all historic preservation work and mitigation documentation carried out pursuant to this Agreement is carried out by or under the supervision of a person or persons meeting at a minimum the Secretary of the Interior's *Professional Qualifications Standards* (48 FR 44716, Sept. 1983).

#### Stipulation 3: Equal Opportunity/Non-Discrimination

The Consulting Parties agree to comply with all applicable federal or state laws relating to equal opportunity and non-discrimination.

#### Stipulation 4: Non-Availability of Funding

This Agreement shall be subject to available funding and nothing in this Agreement shall bind State or Federal agencies to expenditures in excess of funds authorized and appropriated for the purposes outlined in the Agreement.

#### **Stipulation 5: Confidentiality**

Maintaining confidentiality of certain historic information is allowed under Section 304 of the National Historic Preservation Act. Therefore, the nature and location of certain historic properties discussed in the Agreement shall be maintained per 36 CFR Part 800.11(c).

#### Stipulation 6: Previously Unidentified Archeological Resources:

- 6.1) In the event that a previously unidentified archeological resource is discovered during ground disturbing activities, all construction work involving subsurface disturbance will be halted in the area of the resource and in the surrounding area where further subsurface remains can reasonably be expected to occur. The Authority and the SHPO, or an archeologist approved by them, immediately will inspect the work site and determine the area and the nature of the affected archeological property. Construction work may then continue in the project area outside the site area.
- 6.2) The Authority shall then notify the SHPO, the Tribal Historic Preservation Officer (THPO), and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to the affected property, and the Council within two working days of the discovery. The notification shall describe the Authority's assessment of National Register eligibility of the property and proposed actions to resolve the adverse effects. The

- SHPO/THPO, the Indian tribe or Native Hawaiian organization and the Council shall respond within two working days of the notification.
- 6.3) If the resource is determined to meet the National Register Criteria (36 CFR Part 60.6), the Authority shall ensure compliance with Section 800.13 of the Council's regulations. Work in the affected area shall not proceed until either (a) the development or implementation of appropriate data recovery or other recommended mitigation procedures, or (b) the determination is made that the located remains are not eligible for inclusion on the National Register.

### Stipulation 7: Human Remains on Federal Land

- 7.1) Human remains and associated funerary objects of American Indian origin (prehistoric or historic) encountered during the course of actions taken as a result of this Agreement shall be treated in the manner consistent with the provisions of the Native American Graves Protection and Repatriation Act (25 U.S.C 3001) and its implementing regulations, 36 CFR. Part 10. Treatment must include consultation with any Federally-recognized American Indian tribe with an interest in the project, project area, or region.
- 7.2) Human remains of non-Indian origin shall be treated in a manner consistent with the *Virginia Antiquities Act*, Section 10.1-2305 of the *Code of Virginia*,
- 7.3) with the final regulations adopted by the Virginia Board of Historic Resources and published in the Virginia Register of July 15, 1991. A permit for archaeological removal and relocation of human remains meeting this criterion must be obtained from the SHPO.

#### Stipulation 8: Dispute Resolution

Should any party to this Agreement or member of the public object within 30 days to any actions proposed or carried out pursuant to this Agreement, the Authority shall consult with the objecting party to resolve the objection. The Authority shall notify the SHPO of any objection. If the Authority determines that the objection cannot be resolved, the Authority shall forward all documentation relevant to the dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:

- 8.1) Provide the Authority with recommendations, which the Authority will take into account in reaching a final decision regarding the dispute, or;
- 8.2) Notify the Authority that it will comment pursuant to 36 CFR Part 800.7(c), and proceed to comment. Any Council comment provided in response to such a request will be taken into account by the Authority in accordance with 36 CFR Part 800.7(c) (4) with reference to the subject of the dispute, or;

8.3) Any recommendation or comment provided by the Council will be understood to pertain only to the subject of the dispute; the Authority's responsibility to carry out all actions under this Agreement that is not subject of the dispute will remain unchanged.

#### Stipulation 9: Amendment

Any of the signatories may request that MOA be amended according to 36 CFR Part 800.6(c)(7). Any amendment will be effective on the date an amended Agreement is signed by all signatories. The Authority will ensure a copy of any executed amended Agreement is filed with the Advisory Council.

#### Stipulation 10: Duration

The Authority and the SHPO shall review this Agreement in five years from the year of the Agreement's execution to determine whether the Agreement needs to continue and whether any changes may be needed. The review and determinations may take place on a conference call or in a physical meeting as needed. Reviews of this MOA shall occur until the completion of the IAB expansion.

#### Stipulation 11: Termination

In the event the terms of the MOA cannot be or are not being carried out, the signatories shall consult to seek amendment of the Agreement. If an agreement cannot be reached on an amendment, the Authority or the SHPO may terminate it pursuant to 36 CFR Part 800.6(c) (8). Either a new Memorandum of Agreement will be executed under 36 CFR Part 800.6(c)(1) or the Advisory Council for Historic Preservation will be requested to comment pursuant to 36 CFR Part 800.7(a).

Execution of this Agreement, filing of the Agreement with the Council pursuant to 36 CFR Part 800.6(b) (1) (iv), and implementation of its terms is evidence that the Authority has taken into account the effects of the undertaking on historic properties protected under Section 106 of the National Historic Preservation Act and afforded the Council an opportunity to comment on the undertaking pursuant to that Act.

EXECUTION OF THIS MEMORANDUM OF AGREEMENT and the implementation of its terms evidence that the Authority has complied with the terms of the 1987 Programmatic Memorandum of Agreement (as regards Section 106 of the National Historic Preservation Act (36 CFR Part 800) and Section 4(f) of the Department of Transportation Act (23 U.S.C. 138)).

#### METROPOLITAN WASHINGTON AIRPORTS AUTHORITY

James E. Bennett

President and Chief Executive Officer

Metropolitan Washington Airports Authority

#### VIRGINIA STATE HISTORIC PRESERVATION OFFICER

Kathleen S. Kilpatrick

Deputy, Virginia State Historic Preservation Officer

Date:

Concurring:

FEDERAL AVIATION ADMINISTRATION

Terry J. Page

Manager, FAA Washington Airports District Office

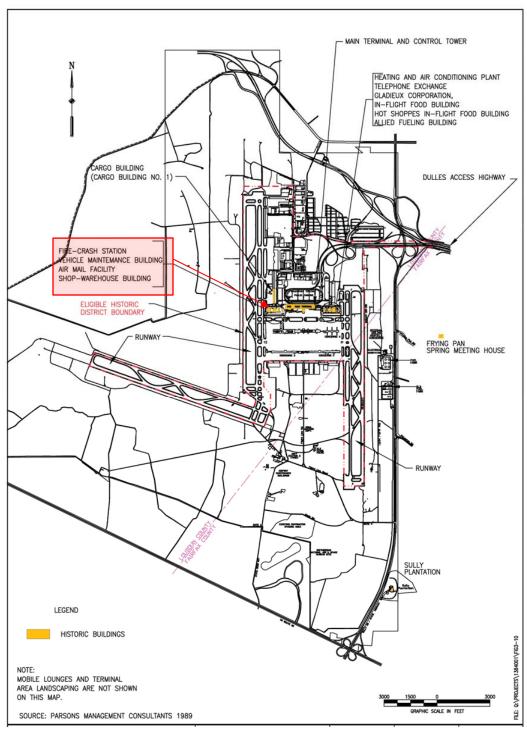


Figure 1: Project Location – IAB Expansion (Historic District and Adjacent Historic Properties Shown)

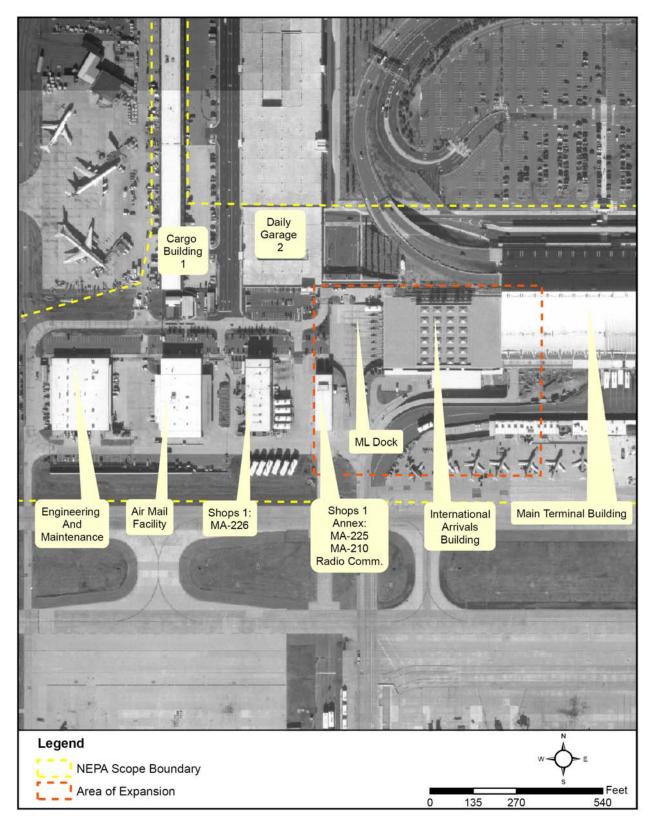


Figure 2: IAB Expansion - West Service Buildings and Main Terminal

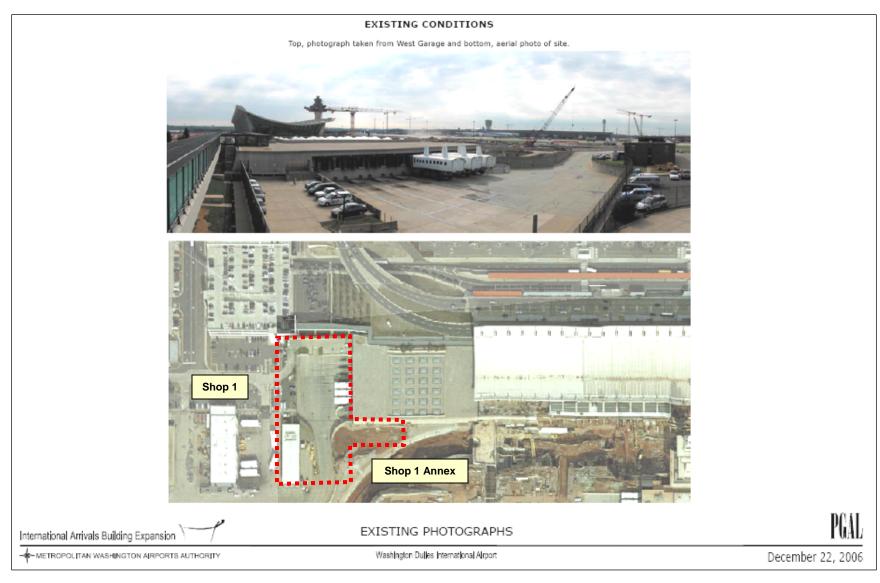


Figure 3: IAB Expansion - West Service Buildings and Main Terminal (Showing Area of IAB Expansion)



Figure 4: Existing Conditions – Shops 1 Annex

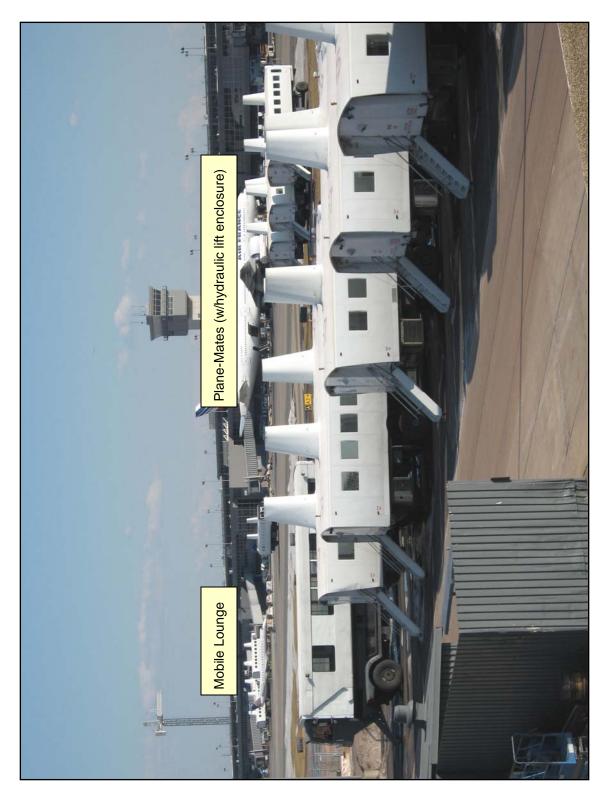


Figure 5: Mobile Lounge and Plane-Mates

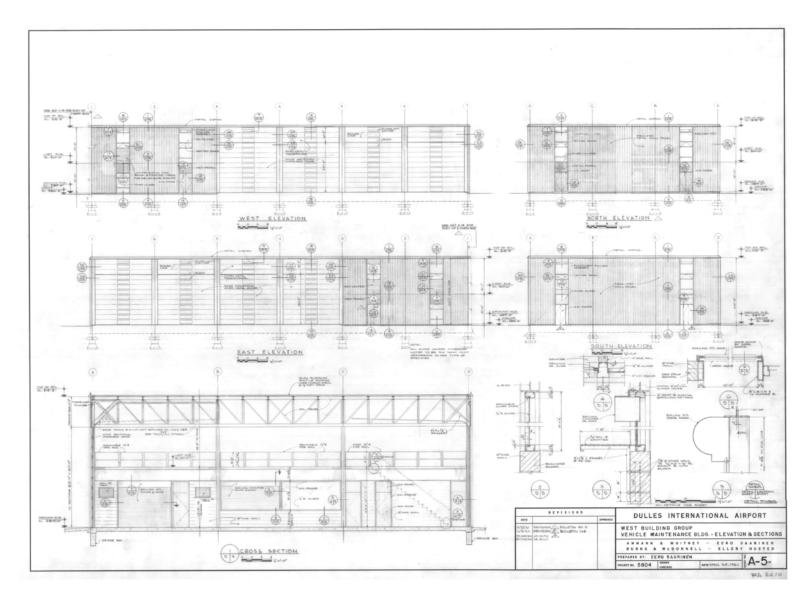


Figure 6: Shop 1 Building (April 14, 1961 - As Built Plans) Showing Existing Doors 1-4

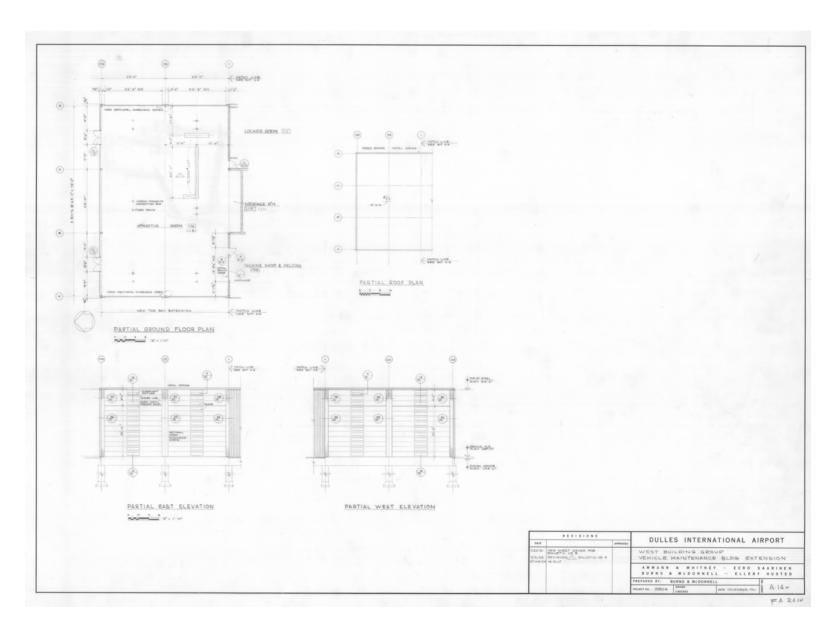
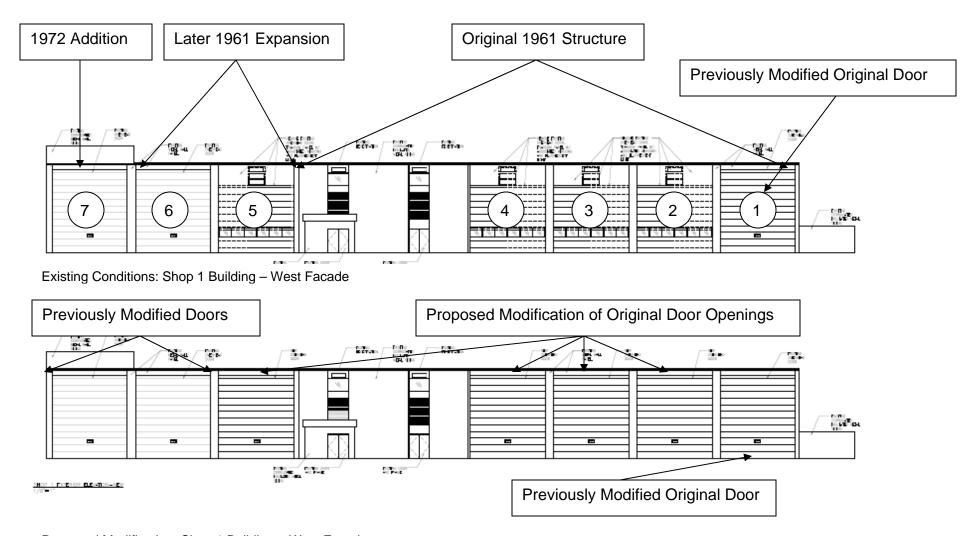


Figure 7: Shop 1 Building Extension (December 1961) Existing Doors 5-6



Figure 8: Shop 1 Building (Showing both sets of replacement doors)



Proposed Modification: Shop 1 Building – West Facade

Figure 9: Proposed Modifications to Shop 1 Doors - West Facade

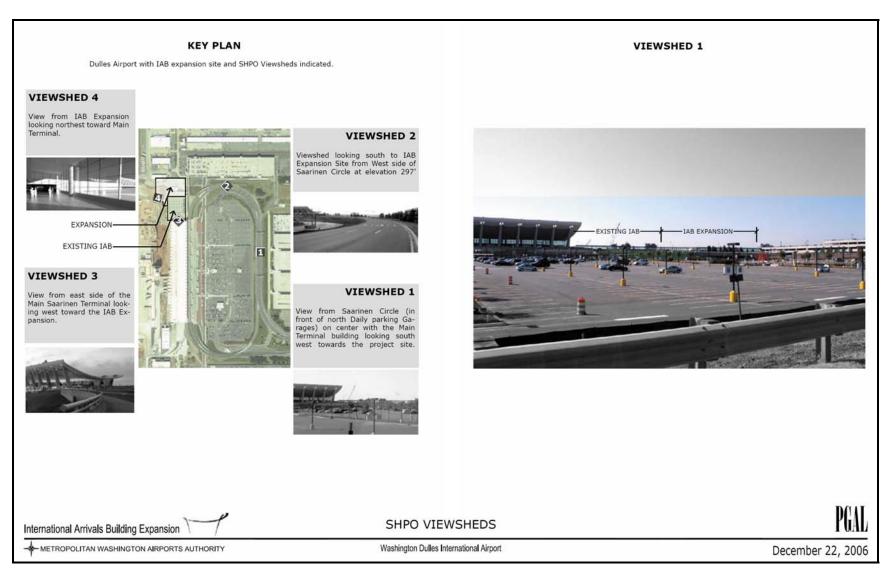


Figure 10: IAB Expansion - Key to Viewshed Analysis & Viewshed 1

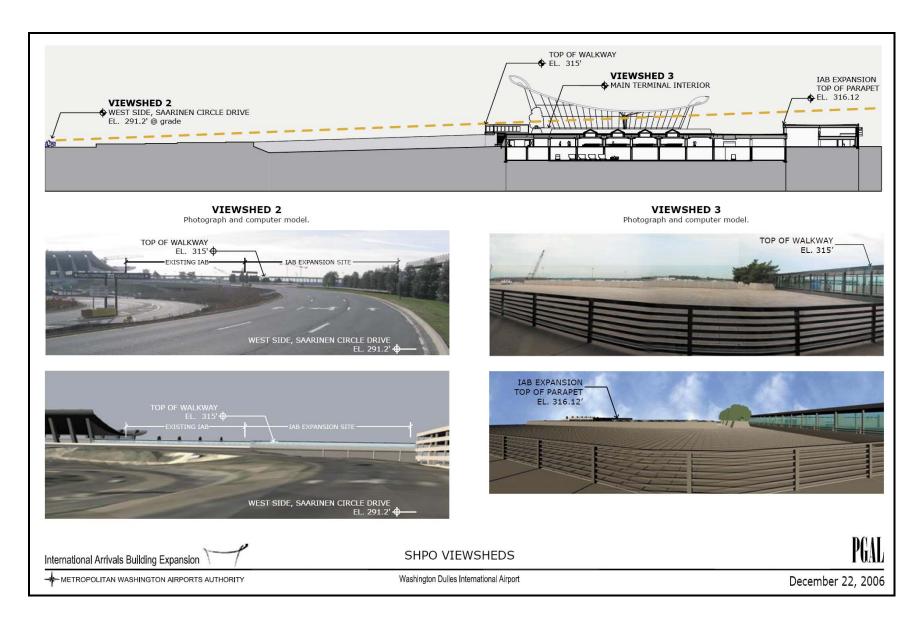


Figure 11: IAB Expansion – Viewshed 2 & 3



Figure 12A: IAB Building – Existing Conditions



Figure 12B: Proposed IAB Building Expansion – Exterior Perspective

5/11/07

#### **ATTACHMENT E**

# **Comments Received Regarding the Draft Environmental Assessment**

Table E-1 summarizes the comments on the Draft EA and the responses. Proof of publication of the Public Notice and copies of all comments received are provided.

Table E-1
Summary of Comments on the Draft Environmental Assessment and Responses

Commentor	Subject	Summary of Comment	Response
Fairfax	Overall impact	Staff concludes no significant	Comment noted
County		environmental impacts would occur	
Loudoun	Memorandum of	Requests to be a consulting party for the	MWAA will amend the MOA to
County	Agreement (MOA)	final MOA	add Loudoun County as a
	on regarding		concurring party, if the FAA and
	historic resources		VA SHPO agree
Loudoun	Water quality	Encourages MWAA to consider 10%	Comment noted
County		reduction in non-point pollutant load	
т 1	0 11	from redeveloped project site	C
Loudoun	Overall comment	Loudoun County supports implement of	Comment noted
County	XX . 1'. 1	the proposed project	G 1
Virginia	Water quality and wetlands	DEQ does not anticipate any significant	Comment noted
Department of Environmenta	wettands	adverse impacts provided MWAA	
1 Quality		implements Best Management Practices (BMPs)	
(DEQ)		(DIMPS)	
Virginia DEQ	Erosion control and	MWAA should implement erosion	MWAA will do this, as noted in
Virginia DEQ	stormwater	control and stormwater management	Section 9 (6) of the Draft EA. Final
	management	plans	EA text modified to specify the
	management	Pittis	regulatory requirements as
			described by DEQ.
Virginia DEQ	Stormwater	MWAA must apply for registration	Final EA text modified to state that
8		coverage under the General Permit for	MWAA will comply with this
		Discharges of Stormwater from	requirement
		Construction Activities	1
Virginia DEQ	Fugitive dust	Use control methods to reduce fugitive	MWAA will do this, as noted in
		dust during construction	Section 10(b)
Virginia DEQ	Air pollution	MWAA should take all reasonable	Final EA text modified to state that
	control	precautions to limit emissions of ozone	MWAA will follow this
		precursors (VOCs and NOx)	recommendation
Virginia DEQ	Open burning	If construction or demolition material is	Project does not involve open
		burned, comply with the regulations for	burning
		open burning and obtain a permit if	
		needed	
Virginia DEQ	Air permitting	MWAA should contact DEQ regarding	Comment noted. MWAA will do
		proposed fuel-burning equipment to	this, as noted in Section 9 (5) (d) (2)
		determine air permit requirements	of the Draft EA

5/11/07

Virginia DEQ	Solid waste and hazardous waste	Draft EA did not address either solid waste issues and sites or hazardous waste issues and sites	Draft EA Section 9 (19) (a) did address solid waste generated by the project. Final EA text in Section 9(22) was modified to address the possible presence of hazardous sites/materials
Virginia DEQ	Solid and hazardous waste sites	From cursory review of its data files, DEQ's Waste Division found 3 solid and hazardous waste sites within the same zip code.	The project site is more than a mile inside the airport boundary and would not be affected by off-airport solid or hazardous waste sites
Virginia DEQ	Solid waste, hazardous wastes, and hazardous materials	The project area is subject to Resource Conservation and Recovery Act (RCRA) Corrective Action (CA). The site was ranked by EPA in 1996 as medium priority using the National Corrective Action Prioritization System (NCAPS). The RCRA CA requirement applies to the entire site, and CA requirements may affect proposed construction. Several solid waste management units (SWMUs) have been identified as a result of the NCAPS ranking	Comment noted
Virginia DEQ	Solid waste, hazardous wastes, and hazardous materials	Any soil that is suspected of contamination or wastes that are generated for future development must bet tested and disposed of in accordance with applicable Federal, State, and local laws and regulations	MWAA will do this, as noted in Section 9 (22) of the Draft EA
Virginia DEQ	Solid waste, hazardous wastes, and hazardous materials	DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction reuse, and recycling of all solid wastes generated	Comment noted
Virginia DEQ	Solid waste, hazardous wastes, and hazardous materials	MWAA should determine if construction may affect areas identified as RCRA SWMUs and/or areas of concern	MWAA has been working with EPA Region III on this issue for several years. The IAB Expansion project does not involve any solid waste management units or areas of concern that are the subject of the RCRA CA. A copy of the Draft EA for the International Arrivals Building Expansion was sent to EPA Region III Northern Virginia Field Office, no comments were received.  Final EA text modified to indicate that the IAB Expansion project does not involve any SWMUs or areas of concern that are the subject of the RCRA CA

5/11/07

Virginia DEQ	Solid waste,	Prior to demolition, check all structures	MWAA and its contractors will do
	hazardous wastes,	being demolished, renovated, and	this
	and hazardous	removed for asbestos-containing	
	materials	materials (ACM) and lead-based paint	
		(LBP) Follow applicable regulations for	
		ACM and LBP.	
Virginia DEQ	Natural Heritage	Review of state files and databases	Comment noted
	resources	indicates no resources or State Natural	
		Area Preserves in project area. Project	
		will not affect any documented state-	
		listed plants or insects	
Virginia DEQ	Wildlife resources	Department of Game and Inland	Comment noted
		Fisheries (DGIF) notes that the project is	
		located within previously disturbed area	
		and anticipates no significant adverse	
		impact upon listed threatened and	
		endangered species under its jurisdiction	
Virginia DEQ	Wildlife resources	Department of Game and Inland	MWAA will do this, as noted in
		Fisheries recommends strict erosion and	Section 9 (6) of the Draft EA.
		sediment control	
Virginia DEQ	Historic and	Department of Historic Resources	Comment noted
	Archaeological	(DHR) confirms that MWAA is	
	Resources	coordinating the proposal in accordance	
		with Section 106 of the National	
		Historic Preservation Act. DHR	
		anticipated continue consultation with	
		the agency	
Virginia DEQ	Aviation	Department of Aviation finds no	Comment noted
		negative impacts to aviation interests	

#### PROOF OF PUBLICATION

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Nicole McKinney well known to me to be Assistant Billing Manager of The Washington Post, a daily newspaper published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was published in The Washington Post, a daily newspaper, upon the following date at a cost of \$1,412.38, and was circulated in the Washington metropolitan area.

Published 1 time. Date: March 30, 2007 Account 388201

Witness my hand and official seal this

My commission expires

Nicole Morton-McFadden Notary Public District of Columbia My Commission Expires 05-31-2011

PUBLIC NOTICE

WASHINGTON DULLES INTERNATIONAL AIRPORT

ENVIRONMENTAL ASSESSMENT FOR

AN EXPANSION TO THE INTERNATIONAL ARRIVALS BUILDING

AND DEMOLITION OF THE SHOP I ANNEX BUILDING

NOW AVAILABLE FOR REVIEW AND COMMENT

The Metropolitan Washington Airports Authority (MWAA) is proposing to expand the existing International Arrivals Building at Washington Dulles International Airport. The project includes the site development, site utilities and demolition of an existing building, the Shop I Annex.
As an integral part of the planning for this project, a Draft Environmental Assessment (EA) was prepared to evaluate existing conditions and potential environmental effects. The Draft EA addresses the environmental consequences of the Proposed Action (Build Alternatives) and No Build Alternative, as well as other issues including air quality, water quality, historical, architectural, archaeological and cultural resources, visual impacts and wetlands. The Draft EA was prepared and comments are requested in conformance with the provisions of the National Environmental Policy Act (NEPA).
Beginning, March 30, 2007, copies of the Draft Environmental Assessment are

being made available for public review and comment at the following libraries: Eastern Loudoun Regional Library (21030 Whitfield Place Sterling, VA), Rust Library (380 Old Waterford Rd. Leesburg, VA), Centreville Regional Library (14200 St. Germaine Dr. Centreville, VA), Chantilly Regional Library (4000 Stringfellow Rd. Chantilly, VA), Fairfax City Regional Library (3915 Chain Bridge Rd. Fairfax, VA), Reston Regional Library (11925 Bowman Towne Dr. Reston, VA), and Tysons-Pimmit Regional Library (7584 Leesburg Pike Falls Church, VA).

Copies of the draft Environmental Assessment are also available for review, by appointment, at the Federal Aviation Administration Washington Airports District Office, 23723 Air Freight Lane, Dulles, VA, (703) 661-1362, and at the Airport Manager's Office located on the baggage claim level of the Main Terminal at Washington Dulles International Airport (703) 572-2710. The Draft EA can also be reviewed at www.mwaa.com.

This public review and comment period is also being conducted pursuant to the MWAA's 1987 Programmatic Memorandum of Agreement with the Virginia State Historic Preservation Officer and the Advisory Council on Historic Preservation (as regards Section 106 of the National Historic Preservation Act of 1966 - 36 CFR 800).

For further information, questions or to submit written comments concerning the EA and historic preservation matters please contact:

Office of Communications, MA-10

Metropolitan Washington Airports Authority

One Aviation Circle

Ronald Reagan Washington National Airport

Washington, DC 20001-6000

703-417-8745

The record is open for public comment until 5:00 p.m. on April 30, 2007.

#### PUBLIC NOTICE

WASHINGTON DULLES INTERNATIONAL AIRPORT
ENVIRONMENTAL ASSESSMENT FOR
AN EXPANSION TO THE INTERNATIONAL ARRIVALS BUILDING
AND DEMOLITION OF THE SHOP I ANNEX BUILDING
NOW AVAILABLE FOR REVIEW AND COMMENT

The Metropolitan Washington Airports Authority (MWAA) is proposing to expand the existing international Airports Building at Washington Dulles International Airport. The project includes the site development, site utilities and demolition of an existing building, the Shop I Ameer.

As an integral part of the planning for this project, a Draft Environmental Assessment (EA) was prepared to evaluate existing conditions and potential environmental effects. The Draft EA addresses the environmental consequences of the Proposed Action (Build Alternatives) and No Build Alternatives) and No Build Alternatives, as well as other issues including air quality, water quality, historical, erchitectural, archaeological and cultural resources, visual impacts and wetlands, the Draft EA was prepared and comments are requested in conformation with the provisions of the National Environmental Policy Act (NEPA).

Beginning, Merch 38, 2007, copies of the Draft Environmental Assessment are being made available for public review and comment at the following Bhraries: Eastern Loudoun Regional Library (21030 Whithleid Pisce Starting, WA), Rust Library (300 Old Waterford Rd, Leesburg, WA), Centreville Regional Library (1420 St. Germaine Dr. Centreville, WA), Chartilip Regional Library (4000 Stringfellow Rd. Chartilip, WA), Fairlas City Regional Library (4000 Stringfellow Rd. Chartilip, WA), Fairlas City Regional Library (3755 Chain Bridge Rd, Fairlas, WA), Reston, WA), and Tysons-Pimmit Regional Library (7584 Leesburg Pike Falls Church, VA).

Copies of the draft Environmental Assessment are also available for review, by appointment, at the Federal Aviation Administration Washington Airports District Office, 23723 Air Freight Lane, Dulles, WA, (703) 661-1362, and at the Airport Manager's Office located on the bagages claim level of the Main Terminal at Washington Dulles International Airport (703) 572-2710.

#### The Draft EA can also be reviewed at www.mwea.com.

This public review and comment period is also being conducted pursuant to the MWAA's 1987 Programmatic Memorandum of Agreement with the Virginia State Historic Preservation Officer and the Advisory Council on Historic Preservation (as regards Section 106 of the National Historic Preservation Act of 1966 - 36 CFR 800).

For further information, questions or to submit written comments concerning the EA and historic preservation matters please contact:

Office of Communications, MA-10 Metropolitan Washington Airports Authority One Aviation Circle Ronald Reagan Washington National Airport Washington, DC 20001-6000

703-417-8745

The record is open for public comment until 5:00 p.m. on April 26, 2007,



# County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

April 23, 2007

Mr. Charles Baummer
Office of Communications, MA-10
Metropolitan Washington Airports Authority
One Aviation Circle
Ronald Reagan Washington National Airport
Washington, D.C. 20001-6000

Dear Mr. Baummer:

The Fairfax County Department of Planning and Zoning has reviewed the draft Environmental Assessment (EA) for the expansion of the International Arrivals Building and Demolition of the Shop 1 Annex, Washington Dulles International Airport. According to the EA, the project would result in the demolition of the existing structure and the construction of the expanded International Arrivals Building in the same general location. The existing structure is noted as approximately 190,000 square feet, while the proposed new structure is noted as 370,000 square feet. Aerial photos of the proposed expansion area included as part of the EA clearly indicate that the overwhelming majority of this area is already comprised of impervious surface areas.

The EA notes that the proposed work will comply with stormwater runoff requirements as well as requirements for erosion and sedimentation control measures. It does not appear that there will be any impacts to wetlands, floodplains or tree cover as a result of the proposed work. It also does not appear that there will be any impacts to surrounding properties resulting from noise or lighting as a result of the proposed construction. As such, staff concludes that there would be no significant environmental impacts as a result of the proposed work.

Thank you for providing us the opportunity to comment. If you have any questions about our comments, feel free to contact John Bell at 703-324-1380.

Sincerely

James P. Z

JPZ/JRB

Mr. Charles Baummer April 23, 2007 Page 2

cc:

Board of Supervisors
Anthony H. Griffin, County Executive
Robert A. Stalzer, Deputy County Executive
Pamela G. Nee, Department of Planning and Zoning
John R. Bell, Department of Planning and Zoning

PLANNING DIVISION 12055 GOVERNMENT CENTER PARKWAY, SUITE 730 **DEPARTMENT OF PLANNING AND ZONING** FAIRFAX, VIRGINIA 22035-5507 COUNTY OF FAIRFAX

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PELSONTED PIRST CLASS

Mr. Charles Baummer
(Office of Communications, MA-10
Metropolitan Washington Airports

Authority

Ronald Reagan Washington National

Washington, D.C. 20001-6000

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In Handandard



Loudoun County Department of Planning 1 Harrison Street, SE 3<sup>rd</sup> Floor Leesburg, Virginia 20175

# **Fax Cover Sheet**

To: Robert D. Roop/	From	Penny Echard
Charke Bournmer		for Joe Gorney
Fax # of	Face	(703) 777-0441
Recipient: 703-417-8371		
Date:	Phone	(703) 771-5948 (Direct)
4-30-07		
Pages: 1 of 4 (including transmittal page)		
Re:	CC:	
Loudoun County Comments 1	e E.	A. (draft) - Expossion to Amiles  Building + Deno. of Shop 1  Please Recycle
☐ Urgent ☐ For Review ☐ Please Com	ment	□ Please Reply □ Please Recycle

• Message:

Hard copy on mail-if you have any questions just give us a call-



# Loudoun County, Virginia

Department of Planning 1 Harrison Street, S.E., 3<sup>rd</sup> Floor, P.O. Box 7000, MSC #62 Leesburg, VA 20177-7000 Telephone (703) 777-0246 • Fax (703) 777-0441

April 30, 2007

Robert Dickinson Roop c/o Office of Communications, MA-10 Metropolitan Washington Airports Authority One Aviation Circle Ronald Reagan Washington National Airport Washington, DC 20001-6000

Re: Draft Environmental Assessment, Expansion to International Arrivals Building

and Demolition of the Shop 1 Annex, Washington Dulles International Airport

Dear Mr. Roop,

Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the Expansion to the International Arrivals Building (IAB) and Demolition of the Shop 1 Annex.

#### RECOMMENDATION

Loudoun County policies support the economic viability of the Washington Dulles International Airport (*Revised General Plan*, Policy 1, p. 5-45). We concur with the proposed project.

Based on the information provided within the EA, we see the proposed project as least disruptive to current operations, more cost effective, and more in keeping with the original vision for the Airport design than the listed alternatives.

We have the following comments regarding the proposed project:

### PROJECT BACKGROUND

The proposed project is intended to address current and future deficiencies in the Airport's ability to manage the international arrival process. When the IAB opened in 1991, it had a peak hour capacity of approximately 2,000 passengers per hour. Various factors, such as passport control procedures, currently constrain the IAB's peak hour capacity to approximately 1,000. By 2011, peak hour demand is expected to increase to 1,900 passengers per hour.

Washington Dulles International Airport Draft Environmental Assessment-IAB April 30, 2007

Our understanding is that the proposed project would seek to address these deficiencies and would entail the following:

- An expansion of the existing 190,000 square foot (sf) IAB facility by 180,000 sf to approximately 370,000 sf;
- An enlargement of the passenger queuing in the immigration lobby;
- An increase in the number of passport control booths to comply with current Customs and Border Patrol processing requirements and regulations, from the existing 38 positions to 48;
- Additional baggage claim devices, from the existing 960 linear feet to 1,800 linear feet:
- An increase in the basement area, used primarily for processing inbound and outbound luggage, from approximately 70,000 sf to approximately 164,000 sf;
- The relocation of the Mobile Lounge docks from the west side of the existing IAB to the south side of the expanded facility;
- The demolition and removal of the existing Building 2409, the Shop 1 Annex, to accommodate the footprint and operations of the IAB expansion to the west and south of the existing IAB; and,
- A future option to build an underground tunnel connecting the 12-gate expansion in Concourse B with the IAB.

#### HISTORIC RESOUCES

The proposed project is within the Washington Dulles International Airport Historic District, which is eligible for listing on the National Register of Historic Places.

Loudoun County seeks the preservation of the County's cultural and scenic character partially through the conservation of historic structures and their settings and the establishment of land uses compatible with historic, open space, and scenic view areas (*Revised General Plan*, Policy 2, p. 5-35).

Because the original intent from the 1960 Master Plan was to locate the international arrivals facility on the west side of the terminal, the proposed project location would be consistent to the original Saarinen design concept.

We understand that the Airport Authority has determined that the demolition of the Shop 1 Annex represents an unavoidable adverse impact on a contributing element of the National Register-eligible Dulles Airport Historic District. However, after meeting with the Virginia State Historic Preservation Officer (SHPO), it was found that neither the relocation of the Shop 1 Annex Building nor the salvaging of the original exterior metal panels for reuse were viable due to the condition of the building. Additionally, the project's overall visual impact to the Main Terminal forecourt and approach roadways would be limited by the location of the project behind the terminal approach ramps.

Washington Dulles International Airport
Draft Environmental Assessment-IAB
April 30, 2007

Additionally, we understand that the Airport Authority has proposed a Memorandum of Agreement (MOA) between the Airport Authority and the Virginia State Historic Preservation Office. We request that Loudoun County be considered as a consulting party for the final MOA and receive a copy of the SHPO response regarding the proposed MOA.

#### WATER QUALITY

According to the Loudoun County Facilities Standards Manual, Section 5.310.B., redevelopment sites are to reduce the nonpoint source pollution load by at least 10 percent. While we recognize that Loudoun County does not have jurisdiction over the federally owned Airport property, we encourage the Airport Authority to consider a reduction in the current nonpoint pollutant load by at least 10 percent as part of the proposed project.

#### CONCLUSION

Loudoun County policies support the economic viability of the Washington Dulles International Airport. We view the proposed project as responsive to changing requirements and needs of the international arrival process and important to the continued operational efficiencies of the Airport. As such, we support the implementation of the proposed project.

Thank you for the opportunity to comment on the Draft Environmental Assessment. If you have any questions regarding these comments, please contact Joe Gorney, Senior Planner in the Loudoun County Department of Planning, at 703-771-5103.

Sincerely,

Julie Pastor, AICP

Director of Planning
Cc: Kevin Haile, P

Kevin Haile, Program Manager, Erosion and Sediment Control Cindy Keegan, AICP, Program Manager, Community Planning William Marsh, Program Manager, Environmental Review Team Linda Neri, Deputy County Administrator

# FAX

# **DEPARTMENT OF ENVIRONMENTAL QUALITY**

# DIVISION OF ENVIRONMENTAL ENHANCEMENT OFFICE OF ENVIRONMENTAL IMPACT REVIEW

CO: Communications  FAX: 703 417 8371  RE: Arrivals Bldg, Dulles Int.	FROM: Ellie Irons Dept. of Environmental Quality Div. of Environmental Enhancement Environmental Impact Review 629 East Main Street, 6th Floor Richmond, VA 23219 Telephone (804) 698-4325
DATE: April 30, 2007	FAX NUMBER: 804/698-4319
	Email: elirons@deq.virginia.gov
TOTAL # OF PAGES INCLUDING COVER:	<u>)</u>
COMMENTS:	* * * * * * * * * * * * * * * * * * *



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

Fax (804) 698-4500 TDD (804) 698-4021

www.deq.virginia.gov

David K. Paylor Director

(804) 698-4000 1-800-592-5482

April 30, 2007

Office of Communications, MA-10
Metropolitan Washington Airports Authority
One Aviation Circle
Ronald Reagan Washington National Airport
Washington, DC 20001-6000

L. Preston Bryant, Jr.

Secretary of Natural Resources

RE: Draft Environmental Assessment for the International Arrivals Building Expansion, Washington Dulles International Airport, Loudoun County, Virginia (DEQ 07-065F).

To the Office of Communications, MA-10:

The Commonwealth of Virginia has completed its review of the March 20, 2007 (received March 30, 2007) Environmental Evaluation Form "C" (Short Environmental Assessment, hereinafter "EA") for the above referenced project. The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies took part in the review of this proposal:

Department of Environmental Quality
Department of Conservation and Recreation
Department of Game and Inland Fisheries
Department of Historic Resources
Department of Aviation

Loudoun County and the Northern Virginia Regional Commission were also invited to comment.

# **Project Description**

The Metropolitan Washington Airports Authority (MWAA) is proposing to expand the existing International Arrivals Building (IAB) at Washington Dulles International Airport located in Loudoun and Fairfax Counties. The project includes the expansion and

refurbishment of the IAB passenger and basement level, installation of utilities, and the demolition of the existing Shop I Annex. The existing facilities of approximately 190,000 square feet will be expanded by about 180,000 square feet to about 370,000 square feet. The project will enlarge the area for passenger queuing in the immigration lobby. The basement area, used primarily for processing inbound and outbound baggage, will increase from approximately 70,000 square feet to approximately 164,000 square feet. The Mobile Lounge docks will be relocated from the west side of the existing IAB to the south side of the expanded facility. An underground tunnel connecting the 12-gate expansion in Concourse B with the IAB is proposed as a future option. The expansion will utilize the area to the west and south of the existing IAB containing the footprint of the existing Shop 1 Annex (Building 2409), which would be demolished in the fall of 2007. The IAB Expansion would commence in winter or spring of 2008 and be completed by 2011.

# **Environmental Impacts and Mitigation**

1. Water Quality & Wetlands. According to the EA (page 10), all construction and subsequent operational activities will be under restrictions identified in the Airport's Virginia Pollutant Discharge Elimination System (VPDES) stormwater discharge permit, as well as pertinent State guidance such as the Northern Virginia Best Management Practices (BMPs) Handbook and Virginia Stormwater Management Handbook. The EA (page 13) states that there are no wetlands present at the project site.

## **Agency Comments**

DEQ does not anticipate that the proposed action would result in any significant temporary or long-term adverse impacts to water quality or wetlands, provided that MWAA implement appropriate Best Management Practices (BMPs). For additional information and coordination, contact Thomas Faha, DEQ Northern Regional Office (NRO), at (703) 583-3846

2. Erosion and Sediment Control and Stormwater Management. According to the EA (page 18), construction activities will follow the Northern Virginia Best Management Practices (BMPs) Handbook and Virginia Stormwater Management Handbook. In addition to the management of stormwater runoff, the construction project will be required to have an individual erosion and sediment control plan reviewed and approved by the Authority's Building Codes/Environmental Department. Furthermore, the document (page 10) states that all construction and subsequent operational activities will be under restrictions identified in the Airport's Virginia Pollutant Discharge Elimination System (VPDES) stormwater discharge permit, as well as pertinent State guidance such as the Northern Virginia Best Management Practices (BMPs) Handbook and Virginia Stormwater Management Handbook.

## **Agency Comments**

According to the Department of Conservation and Recreation's (DCR's) Division of Soil and Water Conservation (DSWC), federal agencies and their authorized agents conducting regulated, land-disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations (VSWML&R), and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 10.000 square feet or more would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. Accordingly, MWAA should prepare and implement erosion and sediment control (ESC) and stormwater management (SWM) plans to ensure compliance with state law. MWAA is ultimately responsible for achieving project compliance through oversight of on-site contractors. regular field inspection, prompt action against non-compliant sites, and/or other mechanisms, consistent with agency policy.

Furthermore, DCR is responsible for the issuance, denial, revocation, termination and enforcement of Virginia Pollutant Discharge Elimination System (VPDES) permits for the control of stormwater discharges from municipal separate storm sewer systems (MS4s) and land-disturbing activities under the Virginia Stormwater Management Program. Therefore, for projects involving land-disturbing activities of one acre or more, the MWAA or its authorized agent is required to apply for registration coverage under the General Permit for Discharges of Stormwater from Construction Activities. General information and registration forms for the General Permit are available on DCR's website at: http://www.dcr.virginia.gov/sw/vsmp.htm#geninfo.

3. Air Pollution Control. The EA (page 8) finds that Loudoun County is currently in attainment for all criteria pollutants except ozone and particulate matter (PM). The document (page 9) notes that the proposed IAB Expansion facility will include an emergency backup generator powered by diesel, propane, or natural gas fuel. The emissions from the backup power generator would be below the *de minimis* level, and would not lead to a violation of air quality standards (page 9). The document concludes that construction and operation of the proposed project would result in negligible or no adverse impacts to ambient air quality in the airport vicinity.

# Agency Comments

According to DEQ's Division of Air Program Coordination, the project site is in an ozone (O<sub>3</sub>) non-attainment area and an emission control area for the contributors to ozone pollution, which are volatile organic compounds (VOCs) and oxides of nitrogen (NO<sub>x</sub>).

Project sponsors should take all reasonable precautions to limit emissions of VOCs and NO<sub>x</sub>, principally by controlling or limiting the burning of fossil fuels.

During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- · Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

If project activities include the burning of construction or demolition material, this activity must meet the requirements under 9 VAC 5-40-5600 et seq. of the Regulations for open burning, and it may require a permit. The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. MWAA should contact the Loudoun County officials to determine what local requirements, if any, exist.

MWAA should contact the Air Permitting section at DEQ-NVRO regarding proposed fuel-burning equipment to determine whether an air permit modification is required. For additional information and coordination, contact Dennis Betts, DEQ-NRO, at (703) 583-3891

4. Solid and Hazardous Wastes and Hazardous Materials. The EA (page 14) states that a contracted solid waste disposal company will haul the materials offsite for either land filling or by another appropriate disposal method. Once the proposed project is completed municipal solid waste will continue to be collected for proper disposal by the existing airport services.

## Agency Comments

DEQ's Waste Division staff determined that the document did not address either solid waste issues and sites or hazardous waste issues and sites, although the generation of such wastes as a result of construction activities is mentioned. Nor did the report include a search of waste-related databases.

#### Waste Database Search

The Waste Division staff completed a cursory review of its data files, and found that the following solid and hazardous waste sites are within the same zip code, although their

proximity to the subject site is unknown:

- Messier Service America Inc. (VAD003259561) a large quantity generator of hazardous waste;
- Con Serv Industries (PBR 102) a solid waste Materials Recovery Facility; and
- Waste Management of Virginia-Sterling (PBR 093) a solid waste Materials Recovery Facility.

The following websites may prove helpful in locating additional information for these identification numbers: <a href="http://www.epa.gov/echo/search\_by\_permit.html">http://www.epa.gov/enviro/html/rcris/rcris query\_java.html</a>.

## Resource Conservation and Recovery Act

The project area is subject to Resource Conservation and Recovery Act (RCRA) Corrective Action by the EPA. The Airport is subject to RCRA Corrective Action by the EPA and the site was ranked by EPA in 1996 as a medium priority site using the National Corrective Action Prioritization System. As the RCRA Corrective Action (CA) requirement applies to the entire site, the proposed construction may be impacted by the CA requirements. Although there is no record of a RCRA Facility Assessment identifying solid waste management units (SWMUs) being completed for the facility, several solid waste management units have been identified as a result of the NCAPS ranking.

# State and Federal Waste Laws and Regulations

Any soil that is suspected of contamination or wastes that are generated for any future development must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable State laws and regulations are:

- Virginia Waste Management Act (Code of Virginia Section 10.1-1400 et seg.);
- Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60);
- Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); and
- Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110).

Some of the applicable Federal laws and regulations are:

- the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. Section 6901 et seq. and the applicable regulations contained in Title 40 of the Code of Federal Regulations); and
- the U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 CFR Part 107).

#### Pollution Prevention

DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately. For more information contact Paul Kohler, DEQ Waste Division, at (804) 698-4208.

#### Recommendations

#### DEQ recommends that:

- MWAA contact Diane Schott, EPA Region III, at (215) 814-3430 to discuss the RCRA CA obligations at the site prior to initiating any land-disturbing activities and to establish if the proposed construction may potentially impact areas of identified solid waste management units and/or areas of concern (AOC).
- All structures being demolished, renovated, and removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations for ACM (9VAC 20-80-640) and LBP (9VAC 20-60-261) must be followed.
- 5. Natural Heritage Resources. According to the EA (page 12), three species, the upland sandpiper (VA State threatened species), the hairy beardtongue and marsh hedgenettle (both designated very rare by the Virginia Natural Heritage Program) have been either observed or documented at or near IAD. MWAA believes that since the implementation of the proposed project will occur within the built-up airport terminal area, which is well out of range of these species, the proposed action will not have an impact on any known or suspected threatened or endangered species or critical habitat.

#### Agency Comments

The Department of Conservation and Recreation's (DCR) Division of Natural Heritage (DNH) has searched its Biotics Data System for occurrences of natural heritage resources from the project area. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in DCR-DNH files, natural heritage resources have not been documented in the project area. The absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources. Please note that new and updated information is continually added to Biotics.

# State-listed Threatened and Endangered Plant and Insect Species

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. DCR finds that the current activity will not affect any documented state-listed plants or insects.

#### State Natural Area Preserves

In addition, DCR files do not indicate the presence of any State Natural Area Preserves under the agency's jurisdiction in the project vicinity.

#### Recommendation

We recommend that DCR-DNH be contacted at (804) 786-7951, to secure updated information on natural heritage resources if a significant amount of time passes before the project is implemented.

6. Wildlife Resources and Protected Species. As noted in 5. Natural Heritage Resources above, three species, the upland sandpiper (VA State threatened species), the hairy beardtongue and marsh hedgenettle have been either observed or documented at or near IAD. The proposed action is not anticipated to have an impact on any known or suspected threatened or endangered species.

# **Agency Comments**

The Department of Game and Inland Fisheries (DGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects (*Virginia Code* Title 29.1). The DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 et seq.), and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

DGIF notes that the project site is located within a previously disturbed section of Dulles Airport. Therefore, DGIF does not anticipate a significant adverse impact upon listed threatened and endangered species under its jurisdiction. To minimize general

impacts, DGIF recommends MWAA implement strict erosion and sediment control measures. For additional information regarding these comments, contact Andrew Zadnik, DGIF, at (804) 367-2733.

7. Historic Structures and Archaeological Resources. According to the EA (page 11), MWAA has determined that the removal of the building, and alteration of the architectural character of the West Service Building complex, would have the potential to cause an adverse effect on two contributing elements of the National Register-eligible Dulles Airport Historic District. MWAA has initiated consultation with the Virginia State Historic Preservation Office (i.e., Virginia Department of Historic Resources), and has agreed to submit a Intensive Survey Form in accordance with a Memorandum of Agreement with the Virginia SHPO.

## Agency Response

DHR confirms that MWAA is coordinating the proposal in accordance with Section 106 of the National Historic Preservation Act. DHR anticipates continued consultation with the agency.

8. Aviation Impacts. The Virginia Department of Aviation (DoAv) reviewed the project document and finds that it does not identify any negative impacts to aviation interests. DoAv believes that the additional capacity provided by the proposal would enhance the value of the airport and help provide necessary service enhancements to the flying public. Any questions or comments may be directed to, R.N. (Rusty) Harrington, DoAv, at (804) 236-3632, Ext. 110.

# **Regulatory and Coordination Needs**

- 1. Erosion and Sediment Control and Stormwater Management. MWAA must comply with Virginia's Erosion and Sediment Control Law (Virginia Code 10.1-567) and regulations (4 VAC 50-30-30 et seq.) and Stormwater Management Law (Virginia Code 10.1-603.5) and regulations (4 VAC 3-20-210 et seq.). Activities that disturb 10,000 square feet or more of land would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. MWAA is encouraged to contact DCR's Potomac Watershed Office, (540) 347-6420, for assistance with developing or implementing E&S and/or Stormwater Management Plans to ensure project conformance during and after construction.
- 2. Air Quality Regulations. This project may be subject to air regulations administered by the Department of Environmental Quality. The following sections of Virginia Administrative Code are applicable:
  - 9 VAC 5-50-60 et seq. governing fugitive dust emissions; and
  - 9 VAC 5-40-5600 et seq., for open burning.

For more information contact Dennis Betts, DEQ Northern Regional Office, (703) 583-3891. Also, contact Loudoun County officials for information on any local requirements pertaining to open burning.

- 3. Solid and Hazardous Wastes. All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations. Some of the applicable state laws and regulations are:
  - Virginia Waste Management Act (Code of Virginia Section 10.1-1400 et seq.);
  - Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60);
  - Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); and
  - Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110).

Some of the applicable Federal laws and regulations are:

- Resource Conservation and Recovery Act (RCRA) (42 U.S.C. Section 6901 et seq.);
- Title 40 of the Code of Federal Regulations; and
- U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 CFR Part 107).

Contact DEQ's Northern Regional Office, (703) 583-3880, concerning location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered.

# Resource Conservation and Recovery Act

DEQ recommends that MWAA contact Diane Schott, EPA Region III, at (215) 814-3430 to discuss any RCRA CA obligations triggered by the proposed project.

# Asbestos-Containing Material and Lead-Based Paint

Asbestos Materials. It is the responsibility of the owner or operator of a renovation or demolition activity, prior to the commencement of the renovation or demolition, to thoroughly inspect the affected part of the facility where the operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material (ACM). Upon classification as friable or non-friable, all waste ACM shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 et seq.). Contact the DEQ Waste Management Program for additional information, (804)

698-4021, and the Department of Labor and Industry, Ronald L. Graham at (804) 371-0444

Lead-Based Paint. If applicable, the proposed project must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements contact the Department of Professional and Occupational Regulation, David Dick at (804) 367-8588.

3. Historic Structures and Archaeological Resources. Pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800, MWAA is encouraged to continue its coordination with the Department of Historic Resources (DHR) under the draft MOA established between the two agencies. For additional information and coordination, contact Marc Holma, DHR, at (804) 367-2323, Ext. 114.

Thank you for the opportunity to review the draft EA for the International Arrivals Building Expansion at Washington Dulles International Airport in Loudoun County. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4325 or John Fisher at (804) 698-4339 for clarification of these comments.

Sincerely,

Ellie Irons, Program Manager

Office of Environmental Impact Review

#### **Enclosures**

cc: Tom Faha, DEQ-NVRO

Paul Kohler, DEQ-ORP Andrew Zadnik, DGIF Robbie Rhur, DCR Ethel Eaton, DHR

R. N. (Rusty) Harrington, DoAv Kirby Bowers, Loudoun County

G. Mark Gibb, Northern Virginia Regional Commission

#### Fisher, John

From:

Faha, Thomas

Sent:

Tuesday, April 24, 2007 5:21 PM

To:

Fisher, John

Subject: 07-65F FAA Dulles Airport Bldg Expansion

John,

Sorry, this was due on the 20th. Let me know if you have any questions.

Tom

**VPDES** issues

No issues.

VWP issues.

No issues.

#### Waste Issues

The description of handling solid waste created during the construction process is adequate. The facility should encourage the beneficial reuse or recovery of any suitable material by sending the construction-related debris to a construction and demolition debris material recovery facility. The plan mention that the hazardous waste may be present, but the plan should also address any potential underground storage tanks that will need to be removed during construction. The existing shops and maintenance facilities have the greatest potential for hazardous waste and impacted soils, so these areas should receive additional investigation. The facility should also confer with the DEQ-NVRO Petroleum Program, to determine any issues related to the ongoing monitoring program at the facility. If they encounter any solid and/or hazardous waste during the construction or operation of this project, they should follow the appropriate regulations for Virginia.

#### **Air Program**

The report indicated that existing fuel burning equipment would be utilized. It should be noted that MWAA - Dulles should contact the Air Permitting section of DEQ's NVRO to ensure that an Air Permit modification is not required for the proposed project. This is in addition to the low NOx construction equipment statement.

Thomas A. Faha Water Permit Manager DEQ-NVRO 13901 Crown Ct Woodbridge, VA 22193 703/583-3846 L. Preston Bryant, Jr. Secretary of Natural Resources



Joseph H. Maroon Director

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APR 3 0 2007

DEQ-Office of Environmental Impact Review

# COMMONWEALTH of VIRGINIA

# DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-6124

#### **MEMORANDUM**

DATE:

April 19, 2007

TO:

John Fisher, DEQ

FROM:

Robert S. Munson, Planning Bureau Manager, DCR-DPRR Folial S. Munson.

SUBJECT:

DEO 07-065F: Dulles International Expansion

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, natural heritage resources have not been documented in the project area. The absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources.

Under a Memorandum of Agreement, DCR represents the Virginia Department of Agriculture and Consumer Services (VDACS) in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

In addition, our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not documented in this letter. Their database may be accessed from www.dgif.virginia.gov/wildlifeinfo map/index.html, or contact Shirl Dressler at (804) 367-6913.

Further, federal agencies and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations (VSWML&R), and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313,

Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 2,500 square feet or more would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. Accordingly, the sponsoring federal agency should prepare and implement erosion and sediment control (ESC) and stormwater management (SWM) plans to ensure compliance with state law. The sponsoring federal agency is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and/or other mechanisms consistent with agency policy. The agency is highly encouraged to contact DCR's Watershed Office and/or the local ESC and SWM authorities to obtain plan development, implementation assistance and to ensure project conformance during and after active construction. [Reference: VESCL §10.1-567; VSWML §10.1-603.15]

A copy of the document titled, DCR Urban Programs Contact Information, is available at <a href="http://www.dcr.virginia.gov/soil\_&\_water/documents/UrbanStaffContacts.pdf">http://www.dcr.virginia.gov/soil\_&\_water/documents/UrbanStaffContacts.pdf</a> for directing requests for assistance to the appropriate DCR office for consideration.

Please note that effective 29 January 2005, House Bill 1177 transferred regulatory authority of the National Pollutant Discharge Elimination System (NPDES) programs related to municipal separate storm sewer systems (MS4s) and construction activities from the State Water Control Board to the Soil and Water Conservation Board and transferred oversight of these programs from the Virginia Department of Environmental Quality to the Virginia Department of Conservation and Recreation. As such, DCR is responsible for the issuance, denial, revocation, termination and enforcement of NPDES permits for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program. The Department of Environmental Quality will continue to manage the remaining NPDES program.

Therefore, for projects involving land disturbing activities equal to one (1) acre or more; or for projects larger than 2,500 square feet and less than one (1) acre, the property owner/authorized agent is required to apply for registration coverage under the General Permit for Discharges of Stormwater From Construction Activities. General information and registration forms for the General Permit are available on DCR's website at <a href="http://www.dcr.virginia.gov/soil">http://www.dcr.virginia.gov/soil</a> & water/vsmp.shtml

Specific questions regarding requirements for the Virginia General (VSMP) Permit for Discharges of Stormwater From Construction Activities should be directed to Ms. Holly Sepety, at (804) 225-2613.

Thank you for the opportunity to comment on this project.

# DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR PROGRAM COORDINATION

# **ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY**

TO: John E. Fisher DEQ - OEIA PROJECT NUMBER: <u>07 - 065F</u>	Æ
PROJECT TYPE: STATE EA / EIR / FONSI X FEDERAL EA / EIS SCC	7
CONSISTENCY DETERMINATION/CERTIFICATION  APR 0 3	2007
PROJECT TITLE: INTERNATIONAL ARRIVALS BUILDING EXPANSION, WASHINGTON  DULLES INTERNATIONAL AIRPORT	
PROJECT SPONSOR: FEDERAL AVIATION ADMINISTRATION	
PROJECT LOCATION: X OZONE NON ATTAINMENT AREA	
REGULATORY REQUIREMENTSMAY BE APPLICABLE TO: X CONSTRUCTION OPERATION	
STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:  1.	

(Kotur S. Narasimhan)
Office of Air Data Analysis

K.S. N Zust

**DATE: April 6, 2007** 



APR 2 0 2007

#### **MEMORANDUM**

TO:

John Fisher, Environmental Program Planner

PWK

FROM:

Paul Kohler, Waste Division Environmental Review Coordinator

DATE:

April 20, 2007

COPIES:

Sanjay Thirunagari, Waste Division Environmental Review Manager; file

SUBJECT:

Environmental Impact Report: International Arrivals building Expansion, Washington

Dulles International Airport; 07-065F

The Waste Division has completed its review of the Environmental Assessment (EA) for the International Arrivals building Expansion, Washington Dulles International Airport at Dulles International Airport in Fairfax and Loudoun Counties, Virginia. We have the following comments concerning the waste issues associated with this project:

The consistency determination did not address either solid waste issues and sites or hazardous waste issues and sites, although the generation of such wastes as a result of construction activities is mentioned. Nor did the report include a search of waste-related databases. The Waste Division staff completed a cursory review of its data files, and noted that the data file search indicated that the following solid and hazardous waste sites are within the same zip code, although their proximity to the subject site is unknown. These are the Messier Service America Inc. (VAD003259561) a large quantity generator of hazardous waste, and two solid waste sites, Con Serv Industries, PBR 102, a Materials Recovery Facility, and Waste Management of Virginia – Sterling, PBR 093, also a Materials Recovery Facility. The following website may prove helpful in locating additional information for these identification numbers: <a href="http://www.epa.gov/echo/search">http://www.epa.gov/echo/search</a> by permit.html.

The project area has been made subject to RCRA Corrective Action by the EPA. Richard Criqui of DEQ's Office of Waste Permitting, was contacted for his review of this EA and has replied that the facility (Washington Dulles International Airport) has been made subject to RCRA Corrective Action by the EPA and the site was ranked by EPA in 1996 as a medium priority site using the National Corrective Action Prioritization System. As the RCRA Corrective Action (CA) requirement applies to the entire site, the proposed construction may be impacted by the CA requirements. Although there is no record of a RCRA Facility Assessment identifying solid waste management units (SWMUs) being completed for the facility, several solid waste management units have been identified as a result of the NCAPS ranking. The Office of Waste Permitting recommends the facility contact Ms. Diane Schott at General Operations Branch (3WC23), EPA region III, 1650 Arch Street, Philadelphia, PA 19103-2029 or by phone at (215) 814-3430 to discuss the RCRA CA obligations at the site prior to initiating any land disturbing activities and to establish if the proposed construction may potentially impact areas of identified solid waste management units and/or areas of concern (AOC).

Any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 et seq.; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 et seq., and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Part 107.

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Paul Kohler at (804) 698-4208.

#### Fisher, John

From: Andrew.Zadnik@dgif.virginia.gov

Sent: Monday, April 23, 2007 11:46 AM

To: Fisher, John

Subject: 07-065F\_ESS 23675\_Building Expansion\_Dulles

This project is located within a previously disturbed section of Dulles Airport. Therefore, we do not anticipate a significant adverse impact upon T&E species under our jurisdiction. To mimize general impacts, we recommend strict erosion and sediment control measures.

Thank you,

Andrew K. Zadrik
Environmental Services Biologist
Virginia Department of Game and Inland Fisheries
4010 West Broad St.
Richmond, VA 23230
804-367-2733
804-367-2427 (FAX)
Andrew.Zadnik@dgif.virginia.gov

If you want the deadline, please notify JOHN FISHER at 804/698-4339 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

## REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. IF TOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR.JOHN B. FISHER
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

COMMENTS

The DAR and FAA are clearly in Consultation
regulary this project pursuent to Section 106. We anthogode continued Coordination between are agencies.

(signed) Proposition (date) 13 Amilo7

(title) Archiberral Historian
(agency) DAR

PROJECT # 07-065F



# COMMONWEALTH of VIRGINIA

Randall P Burdette Director Department of Aviation 5702 Gulfstream Road Richmond, Virginia 23250-2422

April 17, 2007

V/TDD • (804) 236-3624 FAX • (804) 236-3635

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APR 18 2007

Mr. John E. Fisher
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, 6<sup>th</sup> Floor
Richmond, Virginia 23219

DEQ-Office of Environmental Impact Review

Re:

International Arrivals Building, Washington Dulles International Airport Project Number 07-065F

Dear Mr. Fisher:

Thank you for requesting our comments on the International Arrivals Building Expansion at Washington Dulles International Airport, Project Number 07-065F.

The Virginia Department of Aviation has reviewed the document provided and does not have any comments concerning this project at this time. The documents as presented do not conclusively show any negative impacts regarding to aviation interests. The Department believes that the additional capacity provided by the facility will enhance the value of the airport and help provide necessary service enhancements to the flying public.

Please do not hesitate to contact us should you have any questions or require further assistance regarding the Department's review of these projects.

14.71. N

R. N. (Rusty) Harrington

Manager, Planning and Environmental Section

Airport Services Division

tbm/

