



North Carolina
Department of Administration

James B. Hunt, Jr., Governor

Katie G. Dorsett, Secretary

June 19, 2000

Ms. Donna Meyer
US Dept of DOT/FAA
Atlanta Airports Dist. Office
1701 Columbia Ave., Campus Bldg.
Atlanta, GA 30337-2747

Dear Ms. Meyer:

Re: SCH File # 00-E-0000-0506; Draft Environmental Impact Statement Proposed Runway 5L/23R, a Proposed Air Cargo Sorting and Distribution Facility (FedEX Mid Atlantic Hub) and Associated Development at Piedmont Triad International Airport, Greensboro

The above referenced project has been reviewed through the State Clearinghouse Intergovernmental Review Process. Attached to this letter are comments made by agencies reviewing this document.

Should you have any questions, please do not hesitate to call me at (919) 807-2425.

Sincerely,

Ma. Chrys Baggett
Environmental Policy Act Coordinator

Attachments

cc: Region G
Region I

MEMORANDUM



TO: Chrys Baggett
State Clearinghouse

FROM: Melba McGee ✓
Environmental Review Coordinator

RE: Federal Express Air Cargo Sorting and
Distribution Facility 60-B-0506

DATE: June 15, 2000

The Department of Environment and Natural Resources offers the following comments based on our review of the subject document and ongoing coordination with the applicant. Based on the data provided in the DEIS there continues to be a number of issues that need to be addressed and/or further clarified as this project moves forward.

The document reveals that there are possible impacts to the natural environment, as well as, wetland impacts resulting from this project. The DEIS does not provide enough specific details on developing wetland mitigation measures or what measures will be taken to minimize the effects of this project on wildlife habitat. The Piedmont Triad Airport Authority should take more of an aggressive posture toward mitigation for lost wetland functions and compensate for all unavoidable impacts. The Authority is encouraged to develop and incorporate a mitigation plan in the FEIS. State and federal agencies should be consulted in the development of the plan so equivalent values can be agreed upon to offset project impacts. This will assist our regulatory divisions when subsequent permits are reviewed.



Before this department concurs with the project, there are several additional points that need further clarification in reference to alternative analysis and secondary impacts. The authority is encouraged to continue coordinating with DENR agencies as more detailed information is assembled and prior to the circulation of the final document.

Thank you for the opportunity to respond.

Attachments

State of North Carolina
Department of Environment
and Natural Resources
Division of Water Quality



James B. Hunt, Jr., Governor
Bill Holman, Secretary
Kerr T. Stevens, Director

June 1, 2000

MEMORANDUM

To: Melba McGee
Through: John Dorney
From: Cyndi Bell
Subject: Draft Environmental Impact Statement for Proposed Runway 5L/23R, Proposed New Overnight Express Air Cargo Sorting and Distribution Facility, and Associated Developments, Piedmont Triad International Airport; Project Number 00E-0506



The referenced document has been reviewed by the 401/Wetlands Unit. The Division of Water Quality's (DWQ) 401/Wetlands Unit is responsible for the issuance of the Section 401 Water Quality Certification for activities impacting waters of the state including wetlands. The proposed expansion of the Piedmont Triad International Airport (PTIA), including the new Federal Express (FEDEX) facility, will involve fill in up to 36.3 acres of wetlands and up to 15,785 linear feet of stream impacts.

In May 2000, PTIA submitted an application 404/401 Permits to the U.S. Army Corps of Engineers. In accordance with NCAC 15A.01C.0402, DWQ cannot issue a 401 Water Quality Certification until the project has received a Record of Decision from the State Clearinghouse. Also, as we have stated in project meetings since March 1999, it is imperative that stream and wetland mitigation plans are included with the application for 401/404 Permits. Within the DEIS, the discussion of potential stream and wetland mitigation sites is severely limited. Based upon field visits, the Horsepen Creek site on the Longview Golf Course property offers a good opportunity for stream mitigation, but the potential for implementing wetland mitigation at this property is questionable. Furthermore, this site is not large enough to provide all of the stream or wetland mitigation needed for this project. The Piedmont Triad Airport Authority must also pursue wetland and stream mitigation opportunities at other sites, and collect data on soils, hydrology and vegetation before developing mitigation plans. The use of reference sites for the development of these mitigation plans will also be required. The DEIS does not provide enough detail for us to endorse any of these mitigation sites at this time. The airport authority is reminded that an application lacking fully developed mitigation plans for streams and wetlands will be placed indefinitely on hold as incomplete in accordance with 15A NCAC 2H. 0506(h).

Based upon the description provided in the FEIS, an Individual 401 Water Quality Certification will be required for this project. Final permit authorization will require formal application by the Piedmont Triad International Airport and written concurrence from DWQ. This approval will be contingent upon evidence of avoidance and minimization of wetland and stream impacts, and provision of wetland and stream mitigation for unavoidable impacts.

DWQ appreciates the opportunity to provide comments on the DEIS. The applicant is reminded that issuance of a 401 Water Quality Certification requires satisfaction of water quality concerns, to ensure that water quality standards are met and no wetland or stream uses are lost. Questions regarding the 401 Certification Program as it relates to airport projects should be directed to Cyndi Bell at (919) 733-9721.

Cc: John Thomas, CGE, Raleigh
Jennifer Frye, DWQ Winston-Salem Regional Office

PTI/DEIS



North Carolina Wildlife Resources Commission

512 N. Salisbury Street, Raleigh, North Carolina 27604-1188, 919-733-3391
Charles R. Fullwood, Executive Director

MEMORANDUM

TO: Melba McGee
Office of Legislative and Intergovernmental Affairs

FROM: Owen Anderson, Piedmont Region Coordinator
Habitat Conservation Program

DATE: May 29, 2000

SUBJECT: Draft Environmental Impact Statement for Proposed Runway 5L/23R, Proposed New Overnight Express Air Cargo Sorting and Distribution Facility, and Associated Developments, Piedmont Triad International Airport, Greensboro, Guilford County, North Carolina, DENR Project No. 00B-0506

Biologists on the North Carolina Wildlife Resources Commission staff have reviewed the subject document. These comments are provided in accordance with certain provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.) and the North Carolina Statutes (G.S. 113-131 et seq.).

Federal Express (FedEx), an overnight express air cargo operator, has selected the Piedmont Triad International Airport (PTIA) as the site for its new hub. The Piedmont Triad Airport Authority (PTAA) is proposing to construct a 9,000-foot parallel Transport Category runway, an air cargo sorting and distribution facility, roadway improvements, and navigational aids for the new runway.

The Federal Aviation Administration (FAA) reviewed several alternatives in the DEIS. A cursory review of other airports in the region showed that none met the minimum criteria required by FedEx. FedEx did not provide the FAA with detailed evaluations for each of these other airports. In the absence of competing proposals from other airports, the FAA did not give further consideration to this alternative. A total of 40 alternatives were evaluated using various configurations of runway and air cargo facilities at PTIA. Also, an alternative submitted by a local citizens group and an alternative submitted by PTIA was considered. Of the 42 alternatives, 5 met the minimum criteria and were fully evaluated in the DEIS.

Our primary concerns regarding this proposed project are adverse impacts to wildlife and fisheries habitats. All of the proposed alternatives including the no-action alternative will result in impacts to wildlife and fisheries habitats. Impacts to upland habitat range from 48.5 acres to 442.1 acres. Impacts to wetland habitat range from 9.8 acres to 36.7 acres. Impacts to 100-year floodplain range from 23.1 acres to 45.6 acres. Impacts to aquatic habitat range from 2,182.6 linear feet to 16,593.1 linear feet. The no-action alternate would result in the least amount of

impact. Of the build alternatives, W2-A and W3-A would result in the least amount of overall impact to wildlife and fisheries habitats.

The DEIS (p. 8-24) indicates that by 2019 more than 16,000 persons will be employed directly or indirectly as a result of this proposed project in the Six-County Socioeconomic Study Area (Alamance, Davidson, Forsyth, Guilford, Randolph and Rockingham). It is likely most will relocate within the immediate vicinity of the proposed project. Therefore, we are greatly concerned with the secondary impacts that will be associated with this project on wildlife and fisheries habitats.

The DEIS does a good job describing the natural resources and associated impacts of the project. The immediate impacts to wildlife and fisheries habitats due to construction of the new runway and air cargo facility are outlined in the DEIS. However, it is likely that the secondary impacts facilitated by this project (i.e. new business and residential development) will have a greater impact on wildlife and fisheries habitats. Secondary impacts would include continued fragmentation of terrestrial habitats and degradation of aquatic habitats.

We have the following comments, recommendations and requests for information on this project:

1. The proposed project and subsequent secondary development will increase the potential for degradation to aquatic and fisheries resources due to wastewater and stormwater discharges in Greensboro and Guilford County. The Cape Fear River Basinwide Water Quality Management Plan (Draft, 1995) outlines current water quality in streams of the Cape Fear River Basin. The management plan states that segments of North and South Buffalo Creek below Greensboro constitute one of the worst water quality problems in North Carolina. Also, urban non-point sources have impacted portions of North and South Buffalo Creeks, Horseshoe Creek and Brush Creek. In High Point, the East Fork Deep River is impaired due to urban non-point sources and fecal coliform bacteria. In addition, Richland Creek is impaired due to wastewater discharges and urban non-point sources. The DEIS does a good job of describing water quality mitigation measures that will minimize impacts by the proposed project, but it does not address what measures Greensboro, High Point or Guilford County plan to implement to improve water quality in each of these streams. We request that the final EIS address these water quality issues and include what measures are proposed to improve water quality in each of these streams.
2. We concur with the ordinance that requires a minimum 100-foot vegetative buffer for all new development activities along perennial streams (Section 6.2.4 - Possible Water Quality Mitigation Measures, p. 6-12). We request that the final EIS provide clarification on specific vegetation requirements in the buffer area. Typically, we recommend a 100-foot undisturbed, native, forested buffer along all perennial streams. Forested buffers are highly valuable for protecting water quality, stabilizing stream banks, providing shade and cover for fish and providing travel corridors and habitat for wildlife. A 100-foot grassed buffer, particularly fescue, is a vegetated buffer but it will not stabilize stream banks, nor will it provide shade or cover for fish or travel corridors for wildlife.
3. We request that the final EIS address what measures will be implemented to minimize impacts to intermittent stream corridors as a result of the project and secondary development. Typically, we recommend that minimum 35-foot vegetated buffers, preferably forested, be maintained along intermittent stream corridors.
4. The proposed project and subsequent secondary development will increase water demand. Currently Greensboro is at or near the 50-year safe yield for its water supply reservoirs. A new water supply reservoir (Randleman Lake) is proposed but we believe that the details

for the project have yet to be finalized. The final EIS should address what measures will be taken to provide water to the project and to support secondary development in the event that Randleman Lake is not constructed and operational when the proposed project is completed.

3. Secondary development resulting from the proposed project will increase the potential for degradation to aquatic and fisheries resources in the socioeconomic study area due to increased wastewater and stormwater discharges. The Cape Fear River Basinwide Water Quality Management Plan (Draft, 1995) and Yadkin-Pee Dee Basinwide Water Quality Management Plan, Forward and Executive Summary (1998) outline many of the streams in this socioeconomic study area that are impaired by urban non-point sources or wastewater discharges. In Alamance County, Little Alamance Creek (Burlington) is currently impaired by urban non-point sources. In Rockingham County, portions of the Haw River, Troublesome Creek and Little Troublesome Creek (Reidsville) are impaired by wastewater discharges, urban non-point sources or both. In Randolph County, Hackens Creek (Asheboro) is likely impaired by urban non-point sources. In Forsyth County, Salem Creek (Winston-Salem) is listed as impaired. In Davidson Co. Hamby Creek (Lexington - Thomasville) and Lick Creek (Denton) are each listed as impaired. We request that the final EIS address those water quality issues and include what measures are proposed to improve water quality in each of these streams and what measures are proposed to prevent degradation of streams that are unimpaired.

Thank you for the opportunity to provide comment on this DEIS. If we can provide further assistance to you, please contact our office at (919) 528-9886.

cc: Garland Pardo, Supervising Biologist, USFWS
Steve Hall, Zoologist, Natural Heritage Program
Gloria Putnam, Environmental Coordinator, DWQ

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF AIR QUALITY

June 12, 2000

MEMORANDUM

TO: Melba McGee, Office of Legislative and Intergovernmental Affairs

FROM: Alan Kljapak, Director *AK*

SUBJECT: Project No. 0506
Draft Environmental Impact Statement for Proposed Runway 5L/23R,
Proposed Overnight Express Air Cargo Sorting and Distribution Facility,
and Associated Developments, Prepared by the Department of
Transportation Federal Aviation Administration
Piedmont Triad International Airport
Greensboro, NC
Gillford County

The Division of Air Quality has reviewed the proposed project that involves construction and operation of improvements to the Piedmont Triad International Airport (PTIA) located in Greensboro, NC in order to meet levels of activity associated with the requirements of a proposed air cargo hub. The improvements could include a new transport category runway and an air cargo sorting and distribution facility. This memorandum addresses the following air quality issues related to this project. Construction and Operation Permit applicability, Transportation Permit applicability, General Conformity, Transportation Conformity, and construction activities.

Construction and Operation Permit Applicability:

If the modification include installation of stationary sources that emit criteria or hazardous air pollutants and do not meet any of the exemptions specified in 15A NCAC 2X .0102, a construction and operation permit may be required. If you have any questions about construction and operation permit applicability, you should contact Mr. Myron Whitley, Winston-Salem Regional Supervisor, at (336) 771-6000.

Transportation Permit Applicability:

In reference to the document's statements on the need for a Transportation Permit (TF), the North Carolina Transportation Facility permitting program is defined in 13A NCAC 2D, Section 0800. With respect to airport facilities, section .0804 (b) defines when TF permit is required and is quoted as follows:

"Before constructing or modifying any airport facility designed to have at least 100,000 annual aircraft operations, or at least 45 peak-hour aircraft operations (one operation equals one takeoff or one landing), the owner or

FIRST

PERMITS SECTION

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developer of the airport facility shall apply for and have received a permit as described in 15A NCAC 2Q .0600, and shall comply with all terms and conditions therein".

Based on the proposed annual aircraft operations, PTIA is required to apply for and obtain a TF Permit prior to constructing or modifying the airport. The procedure for obtaining a permit, as required by these regulations, may require submission and approval of a detailed CO modeling analysis. The level of service (LOS) evaluations referenced in the air quality rules and in the PTIA EIS are used as a basis for determining when a detailed air quality analysis would be required as a part of the TF permit application. These analyses are not used to determine if a permit is required.

The LOS application/evaluation guidance was developed to evaluate the need for CO modeling of parking facility construction or modifications (airport or non-airport facilities). Major airport modifications involving aircraft activities such as runway modifications and/or increased aircraft operations may constitute a significant increase in outside CO emissions and may need to be evaluated along with the airport parking lot/deck and nearby intersection vehicle CO emissions. Airport TF modeling requirements are made on a case by case basis.

If you have any questions regarding the TF permit requirements for this project, you may contact Ms. Connie Washburn, Environmental Specialist, at (919) 715-6268.

General Conformity:

In accordance with 15A NCAC 2D .1603, a General Conformity determination will need to be made for the proposed runway SI/23R, proposed new overnight express air cargo sorting and distribution facility and associated developments at the PTIA. Once the final environmental impact statement is complete, Ms. Laura Boothe, Environmental Engineer, should be contacted for review of the document and to make a determination of compliance with respect to General Conformity. Ms. Boothe can be reached at (919) 733-1488.

Transportation Conformity:

In accordance with 15A NCAC 2D .1503, a Transportation Conformity determination is required for this project. The DAQ has been involved in the system level conformity analyses of the transportation plans and transportation improvement programs for Greensboro and Winston-Salem. The plans and programs currently conform to the intent of the State Implementation Plan. If you have any further questions about transportation conformity, you may contact Ms. Deidre Hinkle, Environmental Engineer, at (919) 715-7221.

Construction Activities:

The document addresses fugitive dust emissions during construction activities. Adequate wetting, seeding and covering of disturbed areas is an acceptable control measure to mitigate adverse impacts from fugitive dust emissions from land clearing and earth moving operations. Also, the contractors should take care to comply with open burning provision during land clearing.

WETLANDS AND WATERS COMMENTS

Please be advised that you should consider proceeding with pre-application meetings for acquiring your USACOE 404 permit and your DWQ 401 certifications for this project prior to completing your environmental review. Although no permits or certifications can be issued until the environmental document is completed, the 404/401 pre-application process could provide additional insights into the project.

The delineation of the wetland/waters impacts accomplished should be verified by the USACOE for both the acres of jurisdictional wetlands and jurisdictional linear footage of waters during this review. It is suggested that during the 404/401 review that site visits be coordinated so that USACOE and DWQ field personnel, water supply and stormwater administrators, and other interested parties can be present. Both stream and wetland mitigation could be required for impacts which cannot be avoided. High value bottomland hardwood wetlands have been found and avoided during permitting and certifications for other 404/401 impacts in the general area. Stormwater (maintaining current hydrography and water supply (maintaining current quality) issues will also require due diligence and buffer protection. Variances and/or mitigation requirements and/or other actions may be necessary for both. Maximizing mitigation efforts within the same subbasin where the impacts occur will be paramount due to the above issued.

Bioengineering techniques and stream design criteria should be utilized for stream protection, relocations, and restorations as per fluvial morphology and restoration principles developed by Dave Rosgen, et. al.

It will be crucial during construction in or near wetlands and waters, (by all parties contributing to this development), that the 404/401 conditions be followed without deviation (should they be issued) as specific conditions will help reduce the cumulative impacts associated with this project. Controlling equipment operators should be a high priority in order to prevent unpermitted impacts, unnecessary wetland losses, and to provide the required preservation or restoration of preexisting conditions and elevations. Restoration of any construction drained areas and revegetation must be accomplished after construction is finished. Floodplain pools should be avoided in order to protect any endangered or special concern species, if any.

NPDES STORMWATER PERMITS COMMENTS

Any construction activity including clearing, grading, and excavation activities resulting in the disturbance of five (5) or more acres of total land are required to obtain a NPDES Stormwater Permit prior to beginning these activities. This permit requires weekly inspections of all sediment control facilities plus a record of inspection after any rainfall event greater than 0.05 inches. Violations are finable.

Any facility that is defined as having stormwater discharges associated with industrial activity is required to obtain a NPDES Stormwater Permit prior to beginning operation.

State stormwater permits are required for development activities draining to Outstanding Resource Waters or activities within one mile of and draining to High Quality Waters. The NPDES Permit must be obtained prior to development activities.