



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200

Dallas, TX 75202-2733

November 28, 2011

Ryk Dunkelberg
Barnard Dunkelberg and Company
Cherry Street Building
1616 East 15th Street
Tulsa, OK 74120-6027

SUBJECT: Will Rogers World Airport Proposed Terminal Expansion and East Side Development

Dear Mr. Dunkelberg:

The Environmental Protection Agency (EPA) Region 6 has reviewed the Draft Environmental Assessment (DEA) prepared by the Federal Aviation Administration. In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas is providing the following comments regarding the DEA.

Detailed Comments:

Proposed Action, page A.7

Although it is mentioned later in the document that East Side construction would take place in phases, it should also be mentioned here, under Proposed Action.

Fish, Wildlife, and Plant, page C.11

This section should characterize the vegetation in the area of potential effect by type/species and acreage.

Socioeconomic Environment, Environmental Justice, and Children's Environmental Health and Safety Risks, page C.20

This section should provide a more detailed characterization of the demographics within 0.5 mile of the airport. Data should be provided by Census Tract and Block Group for the area surrounding the airport (including a map), focusing on minority and low-income populations. If this data demonstrates that there is a large minority or low-income population near the eastern border of the airport, then an analysis of impacts to those populations should be included in Section D of the Final EA. Impacts to off-airport residential populations could include noise, street closures, etc.

Construction Impacts, page D.6

In the fifth paragraph, it should be noted that the Stormwater Construction General Permit would be obtained from the Oklahoma Department of Environmental Quality, not the EPA, as this authority has been delegated to the State.

Fish, Wildlife, and Plants, page D.8

The areal extent of impacts to vegetation by type/species should be presented in acres.

Wetlands and Waters of the U.S., page D.21

If the project requires an Individual Permit (IP) for placement of fill into jurisdictional waters (including wetlands), a complete mitigation plan must be completed for resource agency and public review. The Applicant should mitigate the functions lost with in kind functions. Furthermore, the mitigation site(s) should be protected in perpetuity and self sustaining. A real estate instrument, management plan, or other long term protection mechanism used for site protection of permittee-responsible mitigation must be approved by the USACE's District Engineer in advance of or concurrent with the activity causing the authorized impacts. A mitigation plan, identifying the performance standards, monitoring plan, and long term management should be provided to the commenting agencies for review.

EPA understands that the wetland delineation was provided to the USACE in October 2011 for their review and concurrence. If the water(s) are deemed jurisdictional, both a Section 401 water quality certification permit and a Section 404 USACE individual permit would be required prior to the start of construction. As such, EPA looks forward to reviewing any future documents that are developed regarding this project, including the Public Notice.

Air Quality

Terminal Expansion Alternatives - Terminal Development (page B.5): Based on future projections of passenger/flight information, the impacts to air quality are expected to be minimal (both with regard to criteria air pollutants and greenhouse gases). However, it is acknowledged that the terminal development alternative will increase potential capacity of the facility from a forecast number of approximately 2.6 million passenger enplanements at the end of the 20-year planning period to approximately 3.4 million enplanements. Are the estimates used to determine insignificance of environmental impacts in this document based upon lowest-case future projections (2.6 million passenger enplanements)? If so, we suggest that the highest-case future projections (3.4 million passenger enplanements) be analyzed, considering the potential increase in activity for the facility over the planning period.

Traffic (page C.25): The statement is made that based on 2010 AADT numbers for roads and locations within project area, the existing roads meet current demand with an acceptable level of service and no delays. With increases in potential capacity of this facility, how will traffic and road use be impacted under the full build-out scenario, assuming the full-capacity use of 3.4 million passenger enplanements?

Construction Impacts (page D.6): The statement is made that "(c)onstruction impacts could also include the increase of solid waste and the potential for an increase in point source pollutant emissions". Please characterize the point source pollutant emissions that are being referred to.

General: Any demolition, construction, rehabilitation, repair, dredging or filling activities have the potential to emit air pollutants and we recommend best management practices be implemented to minimize the impact of any air pollutants. Furthermore, construction and waste disposal activities should be conducted in accordance with applicable local, state and federal statutes and regulations.

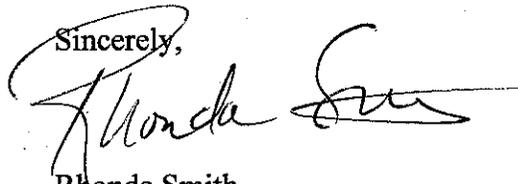
EPA encourages the use of clean, lower-emissions equipment and technologies to reduce pollution. EPA's final Highway Diesel and Nonroad Diesel Rules mandate the use of lower-sulfur fuels in nonroad and marine diesel engines beginning in 2007.

Cumulative Impacts, page D.28

EPA recommends this section be revised to include temporal and geographic boundaries for analyzing the cumulative impacts on all resources of concern. Please refer to the Council on Environmental Quality's "Considering Cumulative Effects Under the National Environmental Policy Act" and EPA's "Consideration Of Cumulative Impacts In EPA Review of NEPA Documents" for assistance with identifying these boundaries and identifying past, present, and reasonably foreseeable future projects to include in the analysis. Analysis should include all projects that occur within the project vicinity, not only on-airport or aviation related projects.

We appreciate the opportunity to provide comments on this DEA. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or macfarlane.john@epa.gov should you have any questions or concerns regarding this letter.

Sincerely,



Rhonda Smith
Chief, Office of Planning and
Coordination

cc: Jasper Blair, City of Oklahoma City