

ATTACHMENT 1:
AGENCY AND PUBLIC CONSULTATION



Maryland Department of Planning
Maryland Historical Trust

Sustain Attain

September 15, 2014

Robin Bowie,
Manager, Division of Environmental Planning
Maryland Aviation Administration
Baltimore/Washington International Thurgood Marshall Airport
P.O. Box 8766
BWI Airport, MD 21240

Re: International terminal Extension, Commuter Concourse Demolition and Related Improvements
Anne Arundel County, Maryland

Dear Ms. Bowie:

Thank you for your recent submittal initiating consultation with the Maryland Historical Trust (Trust) regarding the above-referenced undertaking. The Trust, Maryland's State Historic Preservation Office, has reviewed the proposed actions to assess their effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act of 1966 and the Maryland Historical Trust Act of 1985, as amended. We offer the following comments and concurrence. Based on the information provided, the Trust agrees with the Maryland Aviation Administration that construction of the following ten actions will have no effect on historic properties, including archeological resources, and that no further cultural resources investigations are warranted for this undertaking as currently proposed:

Commuter Concourse Demolition

1. Demolish 12-Gate Commuter Concourse;
2. Reconstruct Commuter aircraft parking apron to accommodate Remain Overnight parking (RON) positions;
3. Re-purpose two of the 12 commuter gates at the end of Concourse DY and add two new hold rooms;

Concourse E (International Terminal) Extension

4. Extend Concourse E 150 feet beyond 90-foot extension for the international baggage screening system (under construction; CATEX approval for 90-foot baggage screening expansion received from FAA on 6/9/14);
5. Add new passenger loading bridges;
6. Add approximately eight (8) acres of new pavement to accommodate aircraft parking and circulation for the eventual full build-out of four gates (designed for Group V aircraft);
7. Mill the area surrounding the proposed pavement improvements;
8. Utility improvements needed to accommodate project, including the extension of the glycol collection system.

Connected Actions

9. Remove Checkpoint Juliet;
10. Abandon Perimeter Intrusion Detection System (PIDS);
11. Enhance security in North Cargo Complex buildings due to PIDS removal (no exterior changes);
12. Modify the vehicle service road and taxilanes to accommodate the location of the proposed projects.

Thank you for providing us this opportunity to comment.

Sincerely,

Beth Cole
Administrator, Project Review and Compliance

Martin O'Malley, Governor
Anthony G. Brown, Lt. Governor

BC/201404470-4481



Richard Eberhart Hall, AICP, Secretary
Amanda Stakem Conn, Esq., Deputy Secretary

From: Beth Cole - MHT [mailto:beth.cole@maryland.gov]
Sent: Monday, August 25, 2014 9:25 AM
To: Robin Bowie
Subject: Re: Proposed International Concourse Expansion Project

Robin,

Thanks for your submittal. We will review and get back to you with our concurrence and comments, if any. Have a great day,

Beth

Beth Cole

Administrator, Project Review and Compliance

Maryland Historical Trust

100 Community Place

Crownsville, MD 21032

beth.cole@maryland.gov / 410-514-7631

mht.maryland.gov

Please note my new email address as of 12/18/13: beth.cole@maryland.gov

On Thu, Aug 21, 2014 at 12:34 PM, Robin Bowie <rbowie@bwiairport.com> wrote:



Beth:

Hi! Hope you are having a nice summer!

MAA is currently proposing to expand our International Terminal/Concourse E, demolish the commuter concourse at the end of Concourse DY, and do some connected actions to those projects. The list below and the attached exhibit show these proposed project areas:

Commuter Concourse Demolition

1. Demolish 12-Gate Commuter Concourse;
2. Reconstruct Commuter aircraft parking apron to accommodate Remain Overnight parking (RON) positions;
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10. Abandon Perimeter Intrusion Detection System (PIDS);
11. Enhance security in North Cargo Complex buildings due to PIDS removal (no exterior changes);
12. Modify the vehicle service road and taxilanes to accommodate the location of the proposed projects.

MAA is seeking concurrence from the Maryland Historical Trust (MHT) based on the Historic Preservation Plan (HPP) that MAA prepared in 1996 in coordination with MHT, that the areas of these proposed projects fall within areas designated in the HPP as previously evaluated and thus no additional study is required. Additionally, these areas are still screened from the Benson Hammond House; therefore there would be no visual impacts as a result of the proposed projects. The proposed projects are not changing existing aircraft operations or procedures, therefore there would be no changes to the noise environment in the vicinity of any historic properties. The Area of Potential Effect (APE) is limited to the construction areas, as shown on the Proposed Action graphic.

Let me know if you need additional information or need to chat! Thanks!

Ms. Robin M. Bowie

Manager, Division of Environmental Planning

Maryland Aviation Administration

Baltimore/Washington International Thurgood Marshall Airport

410-859-7103 (office)

410-859-7082 (fax)

rbowie@bwiairport.com

Mailing Address

P.O. Box 8766

BWI Airport, MD 21240

Overnight Shipping Address

991 Corporate Boulevard

Linthicum, MD 21090



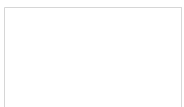
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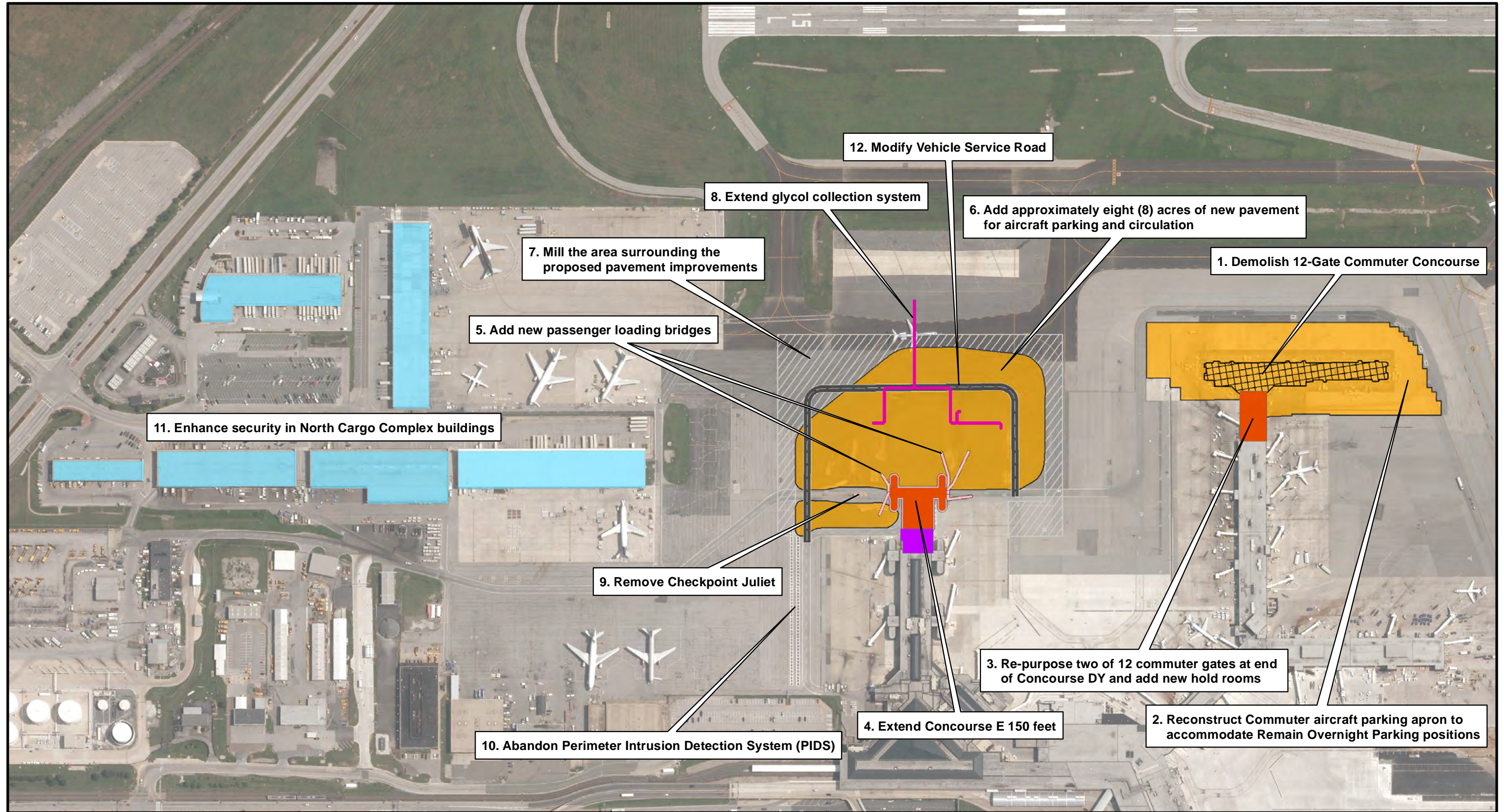


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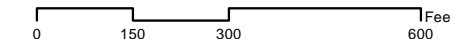
Baltimore/Washington International Thurgood Marshall Airport
International Terminal Extension, Commuter Concourse Demolition and Related Improvements



LEGEND

- | | |
|--|--------------------------|
| International Baggage Screening System* (Under Construction) | Concourse Demolition |
| North Cargo Complex Buildings | Required Pavement |
| Re-Purposed Gates | Glycol Collection System |
| Area to be Milled | |

*Received Categorical Exclusion approval from the FAA on 6/9/2014.



Proposed Action

Subject: FW: Coastal Zone Consistency Request for Proposed International Concourse Expansion Project

From: Elder Ghigiarelli -MDE- [mailto:elder.ghigiarelli@maryland.gov]

Sent: Thursday, October 30, 2014 10:58 AM

To: Robin Bowie

Subject: Re: Coastal Zone Consistency Request for Proposed International Concourse Expansion Project

Robin,

I am responding to your request for a Federal Consistency determination, pursuant to Section 307 of the Coastal Zone Management Act of 1972, as amended (CZMA), for the proposed International Concourse Expansion Project at Baltimore /Washington International Thurgood Marshall Airport. The project consists of expanding the International Terminal/Concourse E, demolishing the commuter concourse at the end of Concourse DY, and associated actions including removing Checkpoint Juliet; abandoning Perimeter Intrusion Detection System (PIDS); enhancing security in North Cargo Complex buildings due to PIDS removal; and modifying the service road and taxilanes to accommodate the location of the proposed projects.

The project will not result in any impacts to sensitive resources, including wetlands, waterways, or forests, and, although a storm water management channel will be covered to accommodate overnight remaining parking, the storm water management plan will address this necessity and the project design will meet the Department's environmental site design requirements to the maximum extent practicable. Based on these considerations, the proposed activities are consistent with the Maryland Coastal Zone Management Program, as required by Section 307 of the CZMA. Please note that this determination does not obviate the responsibility to obtain any other State approvals that may be necessary for the project.

If you have any questions, please contact me.

Elder

Elder Ghigiarelli, Jr.

Deputy Program Administrator

Federal Consistency Coordinator

Wetlands and Waterways Program

Maryland Department of the Environment

Phone: (410) 537-3763

Fax: (410) 537-3751

Subject: Coastal Zone Consistency Request for Proposed International Concourse Expansion Project
Attachments: BWI_E_Gate_Proposed_Action_CZC_09.10.14.pdf
Importance: High

From: Robin Bowie
Sent: Wednesday, September 10, 2014 11:31 AM
To: 'elder.ghigiarelli@maryland.gov'
Subject: Coastal Zone Consistency Request for Proposed International Concourse Expansion Project
Importance: High

Elder:

Hi! Hope you are had a nice summer!

MAA is currently proposing to expand our International Terminal/Concourse E, demolish the commuter concourse at the end of Concourse DY, and do some connected actions to those projects. The list below and the attached exhibit show these proposed project areas:

Commuter Concourse Demolition

1. Demolish 12-Gate Commuter Concourse;
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7. Mill the area surrounding the proposed pavement improvements;
8. Utility improvements needed to accommodate project, including the extension of the glycol collection system.

Connected Actions

9. Remove Checkpoint Juliet;
10. Abandon Perimeter Intrusion Detection System (PIDS);
11. Enhance security in North Cargo Complex buildings due to PIDS removal (no exterior changes);
12. Modify the vehicle service road and taxilanes to accommodate the location of the proposed projects.

MAA is seeking a Coastal Zone Consistency determination from MDE for this project. This project will not affect any wetlands, waterways, or forests. A storm water management channel will be covered to accommodate overnight remaining parking and water quality and quantity will be addressed in design to meet the Maryland Department of Environment's Stormwater Management requirements for environmental site design to the maximum extent practicable.

Let me know if you need additional information or need to chat! Thanks!

Ms. Robin M. Bowie

Manager, Division of Environmental Planning

Maryland Aviation Administration

Baltimore/Washington International Thurgood Marshall Airport

410-859-7103 (office)

410-859-7082 (fax)

rbowie@bwiairport.com

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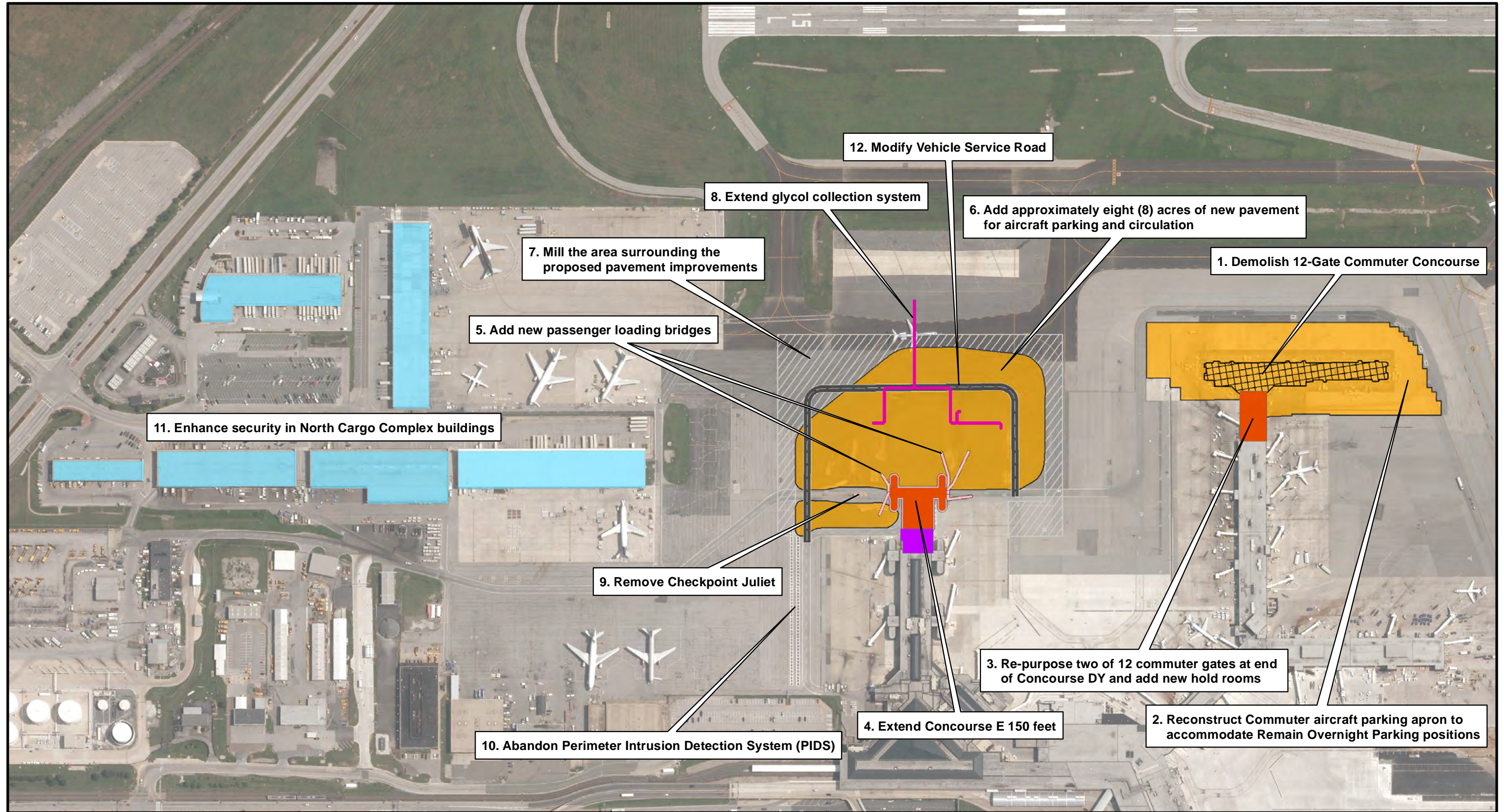
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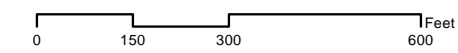
Baltimore/Washington International Thurgood Marshall Airport
International Terminal Extension, Commuter Concourse Demolition and Related Improvements



LEGEND

- | | |
|--|--------------------------|
| International Baggage Screening System* (Under Construction) | Concourse Demolition |
| North Cargo Complex Buildings | Required Pavement |
| Re-Purposed Gates | Glycol Collection System |
| Area to be Milled | |

*Received Categorical Exclusion approval from the FAA on 6/9/2014.



Proposed Action



Maryland Department of Planning

March 10, 2015

Ms. Robin Bowie
Environmental Planning
Maryland Aviation Administration
Baltimore/Washington International Thurgood Marshall Airport
P.O. Box 8766
BWI Airport, MD 21240

STATE CLEARINGHOUSE REVIEW PROCESS

State Application Identifier: MD20150309-0147

Reply Due Date: 04/04/2015

Project Description: Draft Short Environmental Assessment: Proposed International Terminal Extension, Commuter Concourse Demolition and Related Improvements at Baltimore/Washington International Thurgood Marshall Airport (BWI Marshall), Linthicum, MD

Project Location: Anne Arundel County

Clearinghouse Contact: Nasrin Rahman

Dear Ms. Bowie:

Thank you for submitting your project for intergovernmental review. Your participation in the Maryland Intergovernmental Review and Coordination (MIRC) process helps to ensure that your project will be consistent with the plans, programs, and objectives of State agencies and local governments.

We have forwarded your project to the following agencies and/or jurisdictions for their review and comments: the Maryland Department(s) of Natural Resources, the Environment, Transportation; Anne Arundel County; and the Maryland Department of Planning; including the Maryland Historical Trust. A composite review and recommendation letter will be sent to you by the reply due date. Your project has been assigned a unique State Application Identifier that you should use on all documents and correspondence.

Please be assured that we will expeditiously process your project. The issues resolved through the MIRC process enhance the opportunities for project funding and minimize delays during project implementation.

If you need assistance or have questions, contact the State Clearinghouse staff noted above at 410-767-4490 or through e-mail at nasrin.rahman@maryland.gov. Thank you for your cooperation with the MIRC process.

Sincerely,

Linda C. Janey, J.D., Assistant Secretary

LCJ:NR
Enclosure(s)
cc: Caroline Pinegar

15-0147_NRR.NEW.doc

From: [Sophia Richardson -MDP-](#)
To: [Caroline Pinegar](#)
Cc: rbowie@bwiairport.com; [Nasrin Rahman -MDP-](#)
Subject: Re: Clearinghouse Review letter
Date: Monday, March 16, 2015 1:39:46 PM
Attachments: [image001.png](#)

Hi Caroline,
Thanks for the email. These will be added as part of the review document. Sophia
On Mon, Mar 16, 2015 at 11:48 AM, Caroline Pinegar <cpinegar@hntb.com> wrote:

Good morning Sophia,

Please find attached a cover letter and Errata Sheet for the previously submitted (March 6, 2015) Draft Environmental Assessment (EA) for the Proposed International Terminal Extension, Commuter concourse Demolition and Related Improvements at BWI Marshall, to be included with the Draft EA previously received. It is requested that the attached errata be distributed to the agencies as a supplement to the Draft EA.

As a result of this later addition to the document, the closing date for written comments on the Draft EA has been extended through **April 17th, 2015**.

Please don't hesitate to contact myself or Robin Bowie, Manager, Division of Environmental Planning, if you have any questions or need further information.

Regards,

Caroline

Caroline E. Pinegar, AICP, ENV SP

Environmental Project Manager

Tel [\(703\) 253-5843](tel:(703)253-5843) Main [\(703\) 824-5100](tel:(703)824-5100) Fax [\(703\) 671-6210](tel:(703)671-6210)

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From: Sophia Richardson -MDP- [mailto:sophia.richardson@maryland.gov]

Sent: Wednesday, March 11, 2015 9:45 AM

To: RBOWIE@bwairport.com

Cc: Caroline Pinegar

Subject: Clearinghouse Review letter

Good morning, Ms. ,

Thank you for submitting this project to the Clearinghouse, please see the attached Clearinghouse Review letter. Sophia

This e-mail and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. If you are NOT the intended recipient and receive this communication, please delete this message and any attachments. Thank you.

March 16, 2015

Ms. Linda Janey
Assistant Secretary
Maryland Department of Planning
Clearinghouse and Plan Review Section
301 West Preston Street, Room 1104
Baltimore, MD 21201



SUBJECT: Errata Sheet for Draft Short Environmental Assessment (EA)
Proposed International Terminal Extension, Commuter Concourse Demolition and
Related Improvements at Baltimore/Washington International Thurgood Marshall
Airport (BWI Marshall), Linthicum, Maryland

Dear Ms. Janey:

The Clearinghouse received an electronic copy via CD of a Draft Short Environmental Assessment (EA) Form for the proposed International Terminal Extension, Commuter Concourse Demolition and Related Improvements at BWI Marshall in Linthicum, Maryland. Confirmation of receipt was received from the Clearinghouse via email on 3/11/15.

Please find attached an Errata Sheet for the Draft EA, to be included with the Draft EA previously received. It is requested that the enclosed documents be distributed to the agencies as a supplement to the Draft EA.

As a result of this later addition to the document, the closing date for written comments on the Draft EA has been extended through **April 17th, 2015**. Comments should be submitted in writing to:

Ms. Robin M. Bowie
Manager, Division of Environmental Planning
Maryland Aviation Administration
Baltimore/Washington International Thurgood Marshall Airport
P.O. Box 8766
BWI Airport, MD 21240

Please contact Robin Bowie by phone at (410) 859-7103 or via email at rbowie@bwiairport.com if you have questions or require further information.

Sincerely,

A handwritten signature in blue ink that reads "Caroline E. Pinegar".

Caroline E. Pinegar, AICP, ENV SP
HNTB Corporation

Attachments (via email)

cc: Ms. Robin M. Bowie, Manager, Division of Environmental Planning

ERRATA SHEET

SUBJECT: Draft Environmental Assessment for the International Terminal Extension, Commuter Concourse Demolition and Related Improvements at Baltimore/Washington International Thurgood Marshall Airport (Notice of Availability issued 3/6/15)

This errata sheet transmits the revised pages to the Draft Environmental Assessment. Changes in text and figures are indicated with ~~strikeout~~ type where the text is removed and replaced. New text is indicated with ***bold italic*** type where text is added.

Section 2, Project Description

On Page 2, Section 2, Project Description, the following text has been added:

Connected Actions

9. Remove Checkpoint Juliet;
10. Abandon Perimeter Intrusion Detection System (PIDS);
11. Enhance security in North Cargo Complex buildings due to PIDS removal;
12. Modify the vehicle service road and taxilanes to accommodate the location of the proposed projects;
13. Add a parallel stormwater conveyance pipe between Stormwater Channel B14 and Pond B15; ***and***
- 14. Add approximately 0.5 acres of additional apron pavement (call-out highlighted in yellow).***

On Page 4, Section 2, Project Description, the following text has been added:

The extension of Concourse E would impact the Perimeter Intrusion Detection System (PIDS), which would be abandoned as part of the proposed project. Because the PIDS is being removed, security in the North Cargo Complex buildings would need to be enhanced. Increasing security at these buildings would include installation of additional security measures. ***The 0.5-acre grass island immediately south of the North Cargo Complex buildings, between North Cargo Positions F18A and F20A, will be filled and paved to provide additional pavement for adjustment of parking between the two parking positions. The pavement will create additional area for aircraft parking and Remain Overnight (RON) parking and will provide more flexibility for fleet mix parking and cargo servicing of the positions once the aircraft are parked.***

Section 6, Environmental Consequences

On Page 12, Section 6, Environmental Consequences, Subsection (A) Air Quality, the following text has been added:

As shown on **Table 1**, the maximum annual emissions during the long-term airport improvements are expected to occur in 2018. The maximum annual construction emissions during the long-term airport improvements are estimated to be 10.6 tons of CO, 12.6 tons of VOC, 21.0 tons of NO_x, 0.07 tons of SO₂, 101 tons of PM₁₀, and 11.0 tons of PM_{2.5}. Annual emissions presented on Table 1 do not exceed any applicable *de minimis* thresholds for VOC, NO_x, SO₂ or PM_{2.5} for any construction year, and hence, construction related emissions resulting from the BWI Marshall short-term and long-term airport improvements would conform to the O₃ and PM_{2.5} SIPs designed to attain the NAAQS in the Baltimore area. *The connected action of adding an additional 0.5 acres of apron pavement was not included in the 2013 construction emissions inventory summarized in Table 1. However, doubling the highest construction emissions year analyzed, which included the International Terminal expansion and approximately 13.2 acres of pavement, would still not exceed any applicable de minimis thresholds. Therefore it can be presumed that the addition of approximately 0.5 acres of apron pavement to the Proposed Action would not exceed any annual air emissions thresholds.* Therefore, the short-term and long-term airport improvement projects at BWI Marshall result in construction emissions which are below the applicable *de minimis* thresholds for General Conformity. Thus, for NEPA purposes the construction emissions of the Proposed Action conform to the SIP and no further analysis is necessary.

On Page 22, Section 6, Environmental Consequences, Section (S) Water Quality, the following corrections are made to the text:

A stormwater channel (Channel B14) *and 0.5-acre grassed island north of the International Terminal, near the North Cargo Complex*, would need to be filled in and paved over as part of the Concourse E extension and the associated new pavement for aircraft parking and circulation. Therefore stormwater mitigation is needed for the removal of Channel B14 *and the grassed island*, and the addition of new impervious surfaces. In support of this effort, AECOM conducted a preliminary study to provide guidance on treatment requirements for the land use conversion of pervious to impervious surface and to study the pipe capacity of the main stormwater pipes from Channel B14 to Pond B15 during the five-year design storm.

Because the Proposed Action Alternative consists of approximately ~~13.2~~ **13.7** acres of existing impervious and new impervious area, ~~1.4~~ **1.5** ac-ft of treatment would be required in accordance with MDE's redevelopment and new development requirements of Environmental Site Design (ESD) to the Maximum Extent Practical (MEP) (See Table 2). To meet this requirement, three infiltration trench options were identified, shown on Exhibit 8; it was preliminarily determined that two of the options would need to be implemented to meet the ~~1.4~~ **1.5** ac-ft requirements since each option treats only 0.8 ac-ft.

On Page 22, Section 6, Environmental Consequences, Section (S) Water Quality, the following corrections are made to Table 2:

Table 2
Water Quality Treatment Requirements

Development Type	Impervious Area (ac)	Rainfall Target (in)	Treatment Volume (ac-ft)	
			ESD	WQ portion
Redevelopment	5.5	1	0.2	0.2
New development	7.7 8.2	2	1.2 1.3	0.6 0.7
Total	13.2 13.7	--	1.4 1.5	0.8

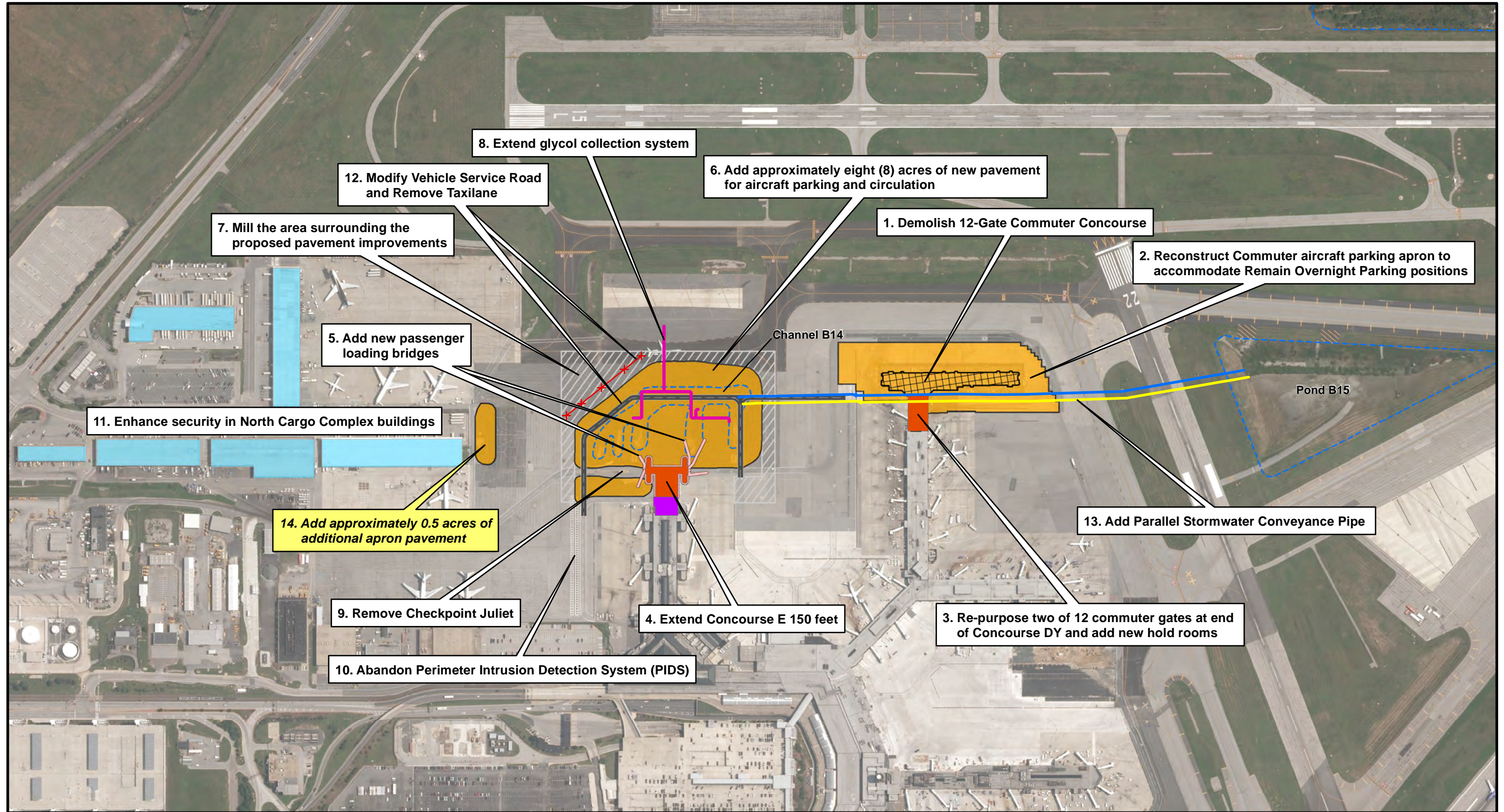
Source: AECOM, *International Terminal Expansion – Stormwater Management Impact Study*, July 2014 and *HNTB Analysis 2015*.

Exhibits

On Exhibit 3, Proposed Action, the following information has been added:

#14: *Add approximately 0.5 acres of additional apron pavement (call-out box highlighted in yellow).* The area is shaded as “Required Pavement” on Exhibit 3.

Baltimore/Washington International Thurgood Marshall Airport
 International Terminal Extension, Commuter Concourse Demolition and Related Improvements



LEGEND

- | | | |
|--|--------------------------|-------------------------------------|
| International Baggage Screening System* (Under Construction) | Concourse Demolition | Existing Stormwater Conveyance Pipe |
| North Cargo Complex Buildings | Required Pavement | Proposed Stormwater Conveyance Pipe |
| Re-Purposed Gates | Glycol Collection System | Stormwater Channel / Pond |
| Area to be Milled | Taxilane Removal | |



Exhibit 3
 Proposed Action

*Received Categorical Exclusion approval from the FAA on 6/9/2014.



Maryland Department of Planning

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

David R. Craig, Secretary
Wendi W. Peters, Deputy Secretary

April 10, 2015

Ms. Robin Bowie
Environmental Planning
Maryland Aviation Administration
Baltimore/Washington International Thurgood Marshall Airport
P.O. Box 8766
BWI Airport, MD 21240

STATE CLEARINGHOUSE RECOMMENDATION

State Application Identifier: MD20150309-0147

Applicant: Maryland Aviation Administration

Project Description: Draft Short Environmental Assessment: Proposed International Terminal Extension, Commuter Concourse Demolition and Related Improvements at Baltimore/Washington International Thurgood Marshall Airport (BWI Marshall), Linthicum, MD

Project Location: Anne Arundel County

Approving Authority: Maryland Department of Transportation MDOT/MAA

Recommendation: Consistent with Qualifying Comment(s)

Dear Ms. Bowie:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 34.02.01.04-.06, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter, with attachments, constitutes the State process review and recommendation based upon comments received to date. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Department(s) of Natural Resources, Transportation, the Environment and the Maryland Department of Planning, including the Maryland Historical Trust, and Anne Arundel County. As of this date, Anne Arundel County has not submitted comments. **This recommendation is contingent upon the applicant considering and addressing any problems or conditions that may be identified by their review. Any comments received will be forwarded.**

The Maryland Department(s) of Transportation and the Maryland Department of Planning, including the Maryland Historical Trust found this project to be consistent with their plans, programs and objectives.

The Department of Transportation stated that "as far as can be determined at this time, the subject has no unacceptable impacts on plans or programs."

The Maryland Historical Trust has determined that the project will have "no effect" on historic properties and that the federal and/or State historic preservation requirements have been met.

The Maryland Department(s) of Natural Resources and Environment found this project to be generally consistent with

Ms. Robin Bowie

April 10, 2015

Page 2

State Application Identifier: **MD20150309-0147**

their plans, programs and objectives, but included certain qualifying comments summarized below.

The Maryland Department of Natural Resources stated that to the extent practical, please consider using green technology and design principles in the demolition and construction phases of this important airport improvement project. This includes reusing and recycling materials and using solar technology, ground-source heat pumps, energy and water efficiency and green landscaping such as pervious pavement.

The Maryland Department of the Environment comments are as follows:

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
5. Any contract specifying “lead paint abatement” must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.
6. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.
7. Additional comments from the Science Services Administration are attached.

Any statement of consideration given to the comments(s) should be submitted to the approving authority, with a copy to the State Clearinghouse. The State Application Identifier Number must be placed on any correspondence

Ms. Robin Bowie

April 10, 2015

Page 3

State Application Identifier: **MD20150309-0147**

pertaining to this project. The State Clearinghouse must be kept informed if the approving authority cannot accommodate the recommendation.

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at nasrin.rahman@maryland.gov. **Also please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. Any substitutions of this form must include the State Application Identifier Number. This will ensure that our files are complete.**

Thank you for your cooperation with the MIRC process.

Sincerely,



Linda C. Janey, J.D., Assistant Secretary

LCJ:NR

Enclosure(s)

cc:

Caroline Pinegar

Greg Golden - DNR

Amanda Degen - MDE

15-0147_CRR.CLS.doc

Tina Quinichette - MDOT

Debra Falconer - ANAR

Peter Conrad - MDPL

Beth Cole - MHT

**Draft Short Environmental Assessment: Proposed International Terminal Extension,
Commuter Concourse Demolition and Related Improvements at Baltimore/Washington**

International Thurgood Marshall Airport (BWI Marshall), Linthicum, MD

Maryland Department of the Environment - Science Services Administration

REVIEW FINDING: R1 Consistent with Qualifying Comments

(MD20150309-0147)

The following additional comments are intended to alert interested parties to issues regarding water quality standards. The comments address:

A. Water Quality Impairments: Section 303(d) of the federal Clean Water Act requires the State to identify impaired waters and establish Total Maximum Daily Loads (TMDLs) for the substances causing the impairments. A TMDL is the maximum amount of a substance that can be assimilated by a waterbody such that it still meets water quality standards.

Planners should be aware of existing water quality impairments identified on Maryland's 303(d) list. The Project is situated in the Patapsco River Lower North Branch and Baltimore Harbor watersheds, identified by the MD 8-digit codes, 02130906 and 02130903 which are currently impaired by several substances, and subject to regulations regarding the Clean Water Act.

Planners may find a list of nearby impaired waters by entering the 8-digit basin code into an on-line database linked to the following URL:
<http://www.mde.state.md.us/programs/Water/TMDL/Integrated303dReports/Pages/303d.aspx>.

This list is updated every even calendar year. Planners should review this list periodically to help ensure that local decisions consider water quality protection and restoration needs. **Briefly, the current impairments that are relevant to the Project include the following:**

Patapsco River Lower North Branch (02130906):

Sulfates:	Non-tidal. A TMDL is pending development.
Bacteria:	Non-tidal. A TMDL was written and approved by EPA.
Sediments:	Non-tidal. A TMDL was written and approved by EPA.
Chlorides:	Non-tidal. A TMDL is pending development.

Baltimore Harbor (02130903):

Biological:	Tidal, Non-tidal. A TMDL is pending development.
Nutrients:	Tidal. A TMDL was written and approved by EPA.
PCBs	Tidal. A TMDL was written and approved by EPA.
PCBs:	Impoundment, Stansbury Pond. A TMDL is pending development.
Sediments:	Tidal. A TMDL was written and approved by EPA.
Bacteria:	Tidal. TMDLs were written and approved by EPA.
Chlordane:	Tidal. A TMDL was written and approved by EPA.
Chromium:	Tidal. A TMDL is pending development.
Trash:	Tidal. A TMDL is pending development.
Zinc:	Tidal. A TMDL is pending development.
Lead:	Tidal. A TMDL is pending development.

B. TMDLs: Development and implementation of the any Plan should take into account consistency with TMDLs developed for the impaired waterbodies referenced above. Decisions made prior to the development of a TMDL should strive to ensure no net increase of impairing substances. TMDLs are made available on an updated basis at the following web site:

<http://www.mde.state.md.us/programs/Water/TMDL/CurrentStatus/Pages/Programs/WaterPrograms/TMDL/Summittals/index.aspx>

Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland's anti-degradation policy;

C. Anti-degradation of Water Quality: Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called "anti-degradation policies." This policy states that "proposed amendments to county plans or discharge permits for discharge to Tier II waters that will result in a new, or an increased, permitted annual discharge of pollutants and a potential impact to water quality, shall evaluate alternatives to eliminate or reduce discharges or impacts." These permitted annual discharges are not just traditional Point Sources, it can include all discharges such as Stormwater.

Currently, Tier II waters are not present in the area surrounding the project.

Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on Tier II waters can be obtained online at: <http://www.dsd.state.md.us/comar/comarhtml/26/26.08.02.04.htm> and policy implementation procedures are located at <http://www.dsd.state.md.us/comar/comarhtml/26/26.08.02.04-1.htm>

Planners should also note that since the Code of Maryland Regulations is subject to periodic updates. A list of Tier II waters pending Departmental listing in COMAR can be found, with a discussion and maps for each county, at the following website:

<http://www.mde.state.md.us/programs/Water/TMDL/Water%20Quality%20Standards/Pages/HighQualityWatersMap.aspx>

ADDITIONAL COMMENTS

Chesapeake Bay TMDL

With the completion of the Chesapeake Bay TMDL, the Chesapeake Bay Program Office (CBPO) will be able to provide loading data at a more refined scale than in the past. MDE will be able to use the CBPO data to estimate pollution allocations at the jurisdictional level (which will include Federal Facilities) to provide allocations to the Facilities. These allocations, both Wasteload (WLA) and Load Allocation (LA) could call for a reduction in both Point Sources and Nonpoint Sources. Facilities should be aware of reductions and associated implementation required by WIPs or FIPs.

Stormwater

The project should consider all Maryland Stormwater Management Controls. Site Designs should consider all Environmental Site Design to the Maximum Extent Practicable and "Green Building" Alternatives. Designs that reduce impervious surface and BMPs that increase runoff infiltration are highly encouraged.

Further Information:

<http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/Pages/Programs/WaterPrograms/SedimentandStormwater/swm2007.aspx>

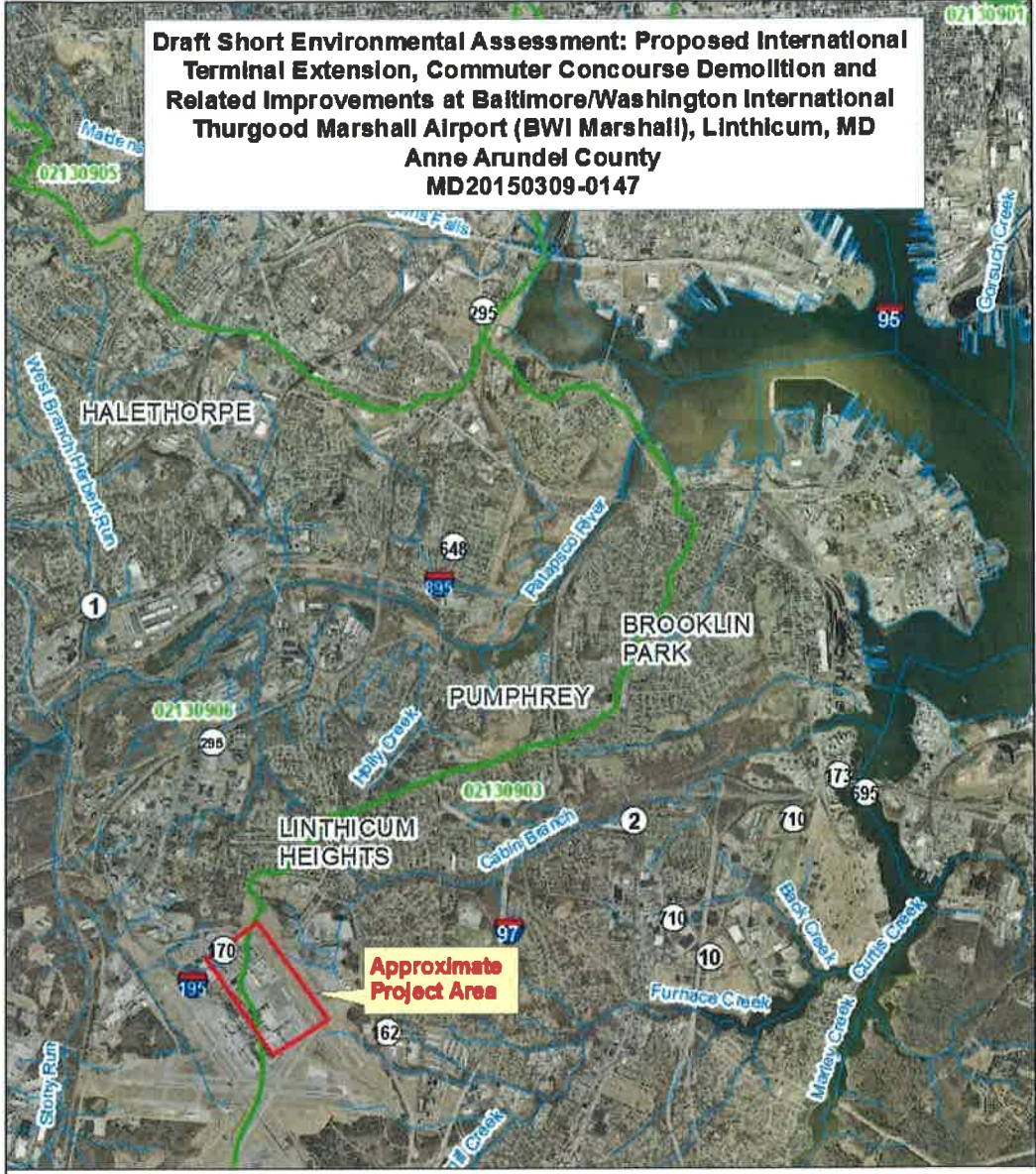
Environmental Site Design (Chapter 5):

<http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/MarylandStormwaterDesignManual/Documents/www.mde.state.md.us/assets/document/chapter5.pdf>

Redevelopment Regulations:





<http://www.dsd.state.md.us/comar/comarhtml/26/26.17.02.05.htm>

**Draft Short Environmental Assessment: Proposed International Terminal Extension, Commuter Concourse Demolition and Related Improvements at Baltimore/Washington International Thurgood Marshall Airport (BWI Marshall), Linthicum, MD
Anne Arundel County
MD20150309-0147**

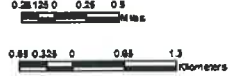


Approximate Project Area

Legend

-  Streams
-  MD High Quality Waters
-  MD High Quality Waters
-  8-digit Watershed

Map Date: 3/17/2015 Drawn By: MDE SSA-NFL
 Lat: 39°10'37.84" N Long: 76°40'8.97" W
 Elevation: 148



Data Sources:
 Google Earth- US Geological Survey
 Imagery - MD Map 2.0
 Streams - State Highway Administration, USGS
 Watersheds: 8-digit - MD Dept of the Environment



Draft Short Environmental Assessment: International Terminal Extension,
Commuter Concourse Demolition and Related Improvements at BWI Marshall

Submitted: For Public and Agency Review (30-day comment period, with errata extension, 3/6/15 through 4/17/15)

State Application Identifier: MD 20150309-0147

#	Reviewer	Date	General Comment	Action	Section
1	Maryland Department of Transportation	4/10/15	As far as can be determined at this time, the subject has no unacceptable impacts on plans or programs.	Comment noted.	No edits.
2	Maryland Historical Trust	4/10/15	The project will have “no effect” on historic properties and that the federal and/or State historic preservation requirements have been met.	Comment noted.	No edits.
3	Maryland Department of Natural Resources (MDNR)	4/10/15	Found the project to be generally consistent with their plans, programs and objectives.	Comment noted.	No edits.
	MDNR	4/10/15	To the extent practical, please consider using green technology and design principles in the demolitions and construction phases of this important airport improvement project. This includes reusing and recycling materials and using solar technology, ground-source heat pumps, energy and water efficiency and green landscaping such as pervious pavement.	The EA discusses that the demolition and construction associated with the project would use sustainable techniques where feasible in <i>Section (H), Energy Supplies, Natural Resources and Sustainable Design.</i>	No edits.
4	Maryland Department of the Environment (MDE)	4/10/15	Found the project to be generally consistent with their plans, programs and objectives.	Comment noted.	No edits.
5	MDE	4/10/15	Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.	If any above or underground petroleum storage tanks are utilized, regulations in accordance with COMAR 26.10 will be adhered to. The appropriate permits with MDE will be obtained and a Spill Prevention Control and Countermeasures (SPCC) plan submitted prior to the facility becoming operational if necessary.	No edits.
6	MDE	4/10/15	If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please	Added to Section (L) Hazardous Materials: <i>“Additionally, if any above ground or underground petroleum storage tanks are</i>	Section (L) Hazardous Materials

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			contact the Oil Control Program at (410) 537-3442 for additional information.	<i>found on site, the contents and tanks along with any contamination would be removed."</i>	
7	MDE	4/10/15	Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.	Text similar to this comment exists in Section (R) Solid Waste: <i>"In accordance with MDE recommendations, any solid waste including demolition and land clearing debris will be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible."</i>	No edits.
8	MDE	4/10/15	The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.	Comment noted.	No edits.
9	MDE	4/10/15	Any contract specifying "lead paint abatement" must comply with Code of Maryland Regulations (COMAR) 26.16.01 – Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 – Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead	Added to Section (L) Hazardous Materials: <i>"The MDE also recommends that any contract specifying "lead paint abatement" must comply with COMAR 26.16.01 - Accreditation and Training for Lead Paint Abatement Services."</i>	Section (L) Hazardous Materials.

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			Division at (410) 537-3825.		
10	MDE	4/10/15	The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.	Comment noted.	No edits.
11	MDE (Science Services Administration)	4/10/15	<p>A. Water Quality Impairments: Section 303(d) of the federal Clean Water Act requires the State to identify impaired waters and establish Total Maximum Daily Loads (TMDLs) for the substances causing the impairments. A TMDL is the maximum amount of a substance that can be assimilated by a waterbody such that it still meets water quality standards.</p> <p>Planners should be aware of existing water quality impairments identified on Maryland's 303 (d) list. The Project is situated in the Patapsco River Lower North Branch and Baltimore Harbor watersheds, identified by the MD 8-digit codes, 02130906 and 02130903 which are currently impaired by several substances, and subject to regulations regarding the Clean Water Act.</p> <p>Planners may find a list of nearby impaired waters by entering the 8-digit basin code into an on-line database linked to the following URL: http://www.mde.state.md.us/programs/Water/TMDL</p>	Comment noted. All TMDL requirements are addressed during permitting. At BWI Marshall, TMDLs are regulated by the Airport's Municipal Separate Storm Sewer System (MS4) Permit, which establishes environmental site design (ESD) practices and ensures that contributions of pollutants of concern to an impaired water body do not exceed TMDLs. BWI Marshall addresses all TMDL concerns through the MS4 permit.	No edits.

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			<p>/Integrated303dReports/Pages/303d.aspx</p> <p>The list is updated every even calendar year. Planners should review this list periodically to help ensure that local decisions consider water quality protection and restoration needs. Briefly, the current impairments that are relevant to the Project include the following:</p> <p><u>Patapsco River Lower North Branch (02130906):</u></p> <p>Sulfates: Non-tidal. A TMDL is pending development.</p> <p>Bacteria: Non-tidal. A TMDL was written and approved by EPA.</p> <p>Sediments: Non-tidal. A TMDL was written and approved by EPA.</p> <p>Chlorides: Non-tidal. A TMDL is pending development.</p> <p><u>Baltimore Harbor (02130903):</u></p> <p>Biological: Tidal, non-tidal. A TMDL is pending development.</p> <p>Nutrients: Tidal. A TMDL was written and approved by EPA.</p> <p>PCBs: Tidal. A TMDL was written and approved by EPA.</p> <p>PCBs: Impoundment, Stansbury Pond. A TMDL is pending development.</p> <p>Sediments: Tidal. A TMDL was written and approved by EPA.</p> <p>Bacteria: TMDLs were written and approved by EPA.</p>		

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			<p>Chlordane: Tidal. A TMDL was written and approved by EPA.</p> <p>Chromium: Tidal. A TMDL is pending development.</p> <p>Trash: Tidal. A TMDL is pending development.</p> <p>Zinc: Tidal. A TMDL is pending development.</p> <p>Lead: Tidal. A TMDL is pending development.</p>		
12	MDE (Science Services Administration)	4/10/15	<p>B. TMDLs: Development and implementation of the any Plan should take into account consistency with TMDLs developed for the impaired waterbodies referenced above. Decisions made prior to the development of a TMDL should strive to ensure no net increase of impairing substances. TMDLs are made available on an updated basis at the following web site: http://www.mde.state.md.us/programs/Water/TMDL/CurrentStatus/Pages/Programs/WaterPrograms/TMDL/Sumittals/index.aspx</p>	<p>Comment noted. The project will be designed in accordance with the Airport’s MS4 permit, which takes into account the TMDLs developed for the impaired water bodies and mandates that the project not result in a net increase of any impairing substances in the impaired waters.</p> <p>BWI Marshall addresses all TMDL concerns through the MS4 permit.</p>	Section (S) Water Quality.
13	MDE (Science Services Administration)	4/10/15	<p>Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland’s anti-degradation policy;</p> <p>C. Anti-degradation of Water Quality: Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called “anti-degradation policies.” This policy states that “proposed amendments to county plans or discharge permits for discharge to Tier II waters that will result</p>	<p>Currently, Tier II waters are not present in the area surrounding the project; comment noted.</p>	No edits.

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			<p>in a new, or an increased, permitted annual discharge of pollutants and a potential impact to water quality, shall evaluate alternatives to eliminate or reduce discharges or impacts.” These permitted annual discharges are not just traditional Point Sources, it can include all discharges such as Stormwater.</p> <p>Currently, Tier II waters are not present in the area surrounding the project.</p> <p>Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on Tier II waters can be obtained online at: http://www.dsd.state.md.us/comar/comarhtml/26/26.08.02.04.htm and policy implementation procedures are located at http://www.dsd.state.md.us/comar/comarhtml/26/26.08.02.04-1.htm</p> <p>Planners should also note that since the COMAR is subject to periodic updates, a list of Tier II waters pending Departmental listing in COMAR can be found, with a discussion and maps for each county, at the following website: http://www.mde.state.md.us/programs/Water/TMDL/Water%20Quality%20Standards/Pages/HighQualityWatersMap.aspx</p>		
14	MDE (Science Services Administration)	4/10/15	<p><u>Chesapeake Bay TMDL</u></p> <p>With the completion of the Chesapeake Bay TMDL, the Chesapeake Bay Program Office (CBPO) will be able to provide loading data at a more refined scale than in the past. MDE will be able to use the CBPO data to estimate pollution allocations at the jurisdictional level</p>	Comment noted.	No edits.

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			(which will include Federal Facilities) to provide allocations to the facilities. These allocations, both Wasteload (WLA) and Load Allocation (LA) could call for a reduction in both Point Sources and Nonpoint Sources. Facilities should be aware of reductions and associated implementation required by WIPs or FIPs.		
15	MDE (Science Services Administration)	4/10/15	<p><u>Stormwater</u></p> <p>The project should consider all Maryland Stormwater Management Controls. Site Designs should consider all Environmental Site Design to the Maximum Extent Practicable and “Green Building” Alternatives. Designs that reduce impervious surface and BMPs that increase runoff infiltration are highly encouraged. Further information:</p> <p>http://www.mde.state.md.us/programs/Water/StormwaterManagementProgram/Pages/Programs/WaterPrograms/SedimentandStormwater/swm2007.aspx</p> <p>Environmental Site Design (Chapter 5):</p> <p>http://www.mde.state.md.us/programs/Water/StormwaterDesignManual/Documents/www.mde.state.md.us/assets/document/chapter5.pdf</p> <p>Redevelopment Regulations:</p> <p>http://www.dsd.state.md.us/comar/comarhtml/26/26.17.02.05.htm</p>	Discussion of stormwater impacts, Environmental Site Design and redevelopment and new requirements in accordance with MDE exists in Section (S) <i>Water Quality</i> .	No edits.