

Appendix G

Public & Agency Involvement

Draft Environmental Assessment
Proposed Airport Traffic Control Tower and Associated Improvements at BWI Marshall Airport

This page is left intentionally blank.

APPENDIX G:

Public & Agency Involvement

- Attachment 1: Agency Scoping Package and Agency Contact List, June 28, 2023
- Attachment 2: Agency Scoping Responses
 - *MHT, July 11, 2023*
 - *MDE Air and Radiation Administration, July 17, 2023*
 - *MDNR Wildlife and Heritage Service, July 24, 2023*
 - *USDA Wildlife Services, July 27, 2023*
 - *MDE Federal Consistency Coordinator, August 3, 2023*

Attachment 1:

Agency Scoping Package and Agency Contact List

June 28, 2023

June 28, 2023

**Subject: Agency Scoping for the BWI Marshall Airport New Airport Traffic Control Tower
Environmental Assessment**

The Maryland Aviation Administration (MAA) is initiating preparation of the Environmental Assessment (EA) to evaluate and disclose the potential environmental impacts associated with a new Airport Traffic Control Tower (ATCT) and associated improvements at BWI Marshall Airport. MAA invites your agency to participate in the scoping process for this EA. The attached Scoping Information Package includes background information; describes the Proposed Action; presents the preliminary purpose and need and alternatives; identifies the environmental impact categories most likely impacted; and provides a preliminary schedule.

MAA encourages you to review these materials and provide comments by **Monday, July 31st**. Comments provided by this time will assist the MAA in identifying issues early in the development of the EA. You are welcome to submit comments either by mail at the below address or by email to: kclarke@bwiairport.com.

Mr. Kevin Clarke
Director, Office of Planning & Environmental Services
Division of Planning & Engineering
Maryland Aviation Administration
PO Box 8766
BWI Airport, MD 21240-0766

Environmental Assessment for New Airport Traffic Control Tower and Associated Improvements at BWI Marshall Airport

Scoping Information Package

Introduction

The Maryland Aviation Administration (MAA) is proposing a new Airport Traffic Control Tower (ATCT) and associated improvements for implementation at Baltimore / Washington International Thurgood Marshall Airport (BWI Marshall Airport). An Environmental Assessment (EA) is being completed to satisfy the requirements of the National Environmental Policy Act of 1969 (NEPA). This document provides preliminary information regarding the EA to facilitate agency review and comment and includes the following sections:

- Background
- Proposed Action
- Preliminary Purpose and Need
- Preliminary Alternatives
- Environmental Analysis
- Preliminary Schedule

The MAA encourages each agency to review these materials and provide comments by **Monday, July 31st**. Comments provided by this time will assist the MAA in identifying issues early in the development of the EA. You are welcome to submit comments either by mail at the below address or by email to kclarke@bwiairport.com.

Please submit written comments to:

Mr. Kevin Clarke
Director, Office of Planning & Environmental Services
Division of Planning & Engineering
Maryland Aviation Administration
PO Box 8766
BWI Airport, MD 21240-0766

Background

BWI Marshall Airport is an international air carrier airport located in Anne Arundel County, Maryland that is owned and operated by the MAA. The Airport is located approximately 10 miles south of Baltimore and 30 miles northeast of Washington, DC. The airfield includes two parallel runways (Runway 15R-33L and Runway 15L-33R) and one crosswind runway (Runway 10-28), a helipad, and multiple taxiways. Aviation support facilities include aircraft hangars and tie down areas, a terminal building, an ATCT, aircraft rescue and firefighting facilities, and fuel facilities.

The MAA is proposing to advance multiple projects identified as part of the BWI Marshall C-D Connector & ATCT Program. To implement these improvements, described as the Proposed Action, FAA action in the form of an environmental finding will be required. NEPA requires environmental review of federal actions including federal funding, approvals and certifications. Therefore, an EA is being prepared in accordance with FAA policies and procedures for considering environmental impacts: FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions* and FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.

**Environmental Assessment for New Airport Traffic Control Tower
and Associated Improvements at BWI Marshall Airport**

Scoping Information Package

Proposed Action

The Proposed Action includes the following, as illustrated on **Figures 1 and 2**:

- Construct a new 236-foot tall ATCT (including ASDE¹ and antenna) to replace the existing ATCT²; this would include all necessary new equipment and utilities;
- Construct Operational Spaces for FAA Staffing Offices within the Passenger C-D Connector;
- Construct a New Hotel; and
- Remove Part 77 obstructions.³

Connected Actions

Connected actions are those which are closely related to the proposed action and would not occur unless the proposed action occurs. The following actions are connected to the Proposed Action:

- Construct supplemental ATCT upgrades to existing but unused ramp control tower, including upgrades needed to make it compliant with the American Disabilities Act (ADA); and
- Remove line-of-sight (LOS) obstructions between the existing and new ATCT and Future Taxiway F.

Preliminary Purpose and Need

Defining the Purpose and Need is essential in providing a sound justification for the proposed action. In addition, the Purpose and Need is used as the primary foundation to develop reasonable alternatives to the Proposed Action.

The ***purpose*** of the Proposed Action is to:

- Provide a replacement ATCT and FAA office spaces that meet the space and height requirements as specified in FAA Order 6480.7E, *Airport Traffic Control (ATCT) and Terminal Radar Approach Control (TRACON) Design Policy* and FAA Order 6480.4B, *Airport Traffic Control Tower Siting Criteria*.
- Provide a convenient, high-quality hotel for BWI users within the main terminal area which maximizes revenue for the Airport.
- Ensure safe air navigation that meets the requirements specified in *CFR Title 14 Part 77- Safe, Efficient Use, and Preservation of the Navigable Airspace (Part 77)*.

¹ Airport Surface Detection System (ASDE) consisting of an enclosed rotating radar array.

² Demolition of the existing ATCT is not part of the Proposed Action. Plans for the existing ATCT have not been determined at this time.

³ CFR Title 14 Part 77- *Safe, Efficient Use, and Preservation of the Navigable Airspace (Part 77)*. The Proposed Action includes Part 77 obstructions located adjacent to line-of-sight (LOS) obstructions associated with the new ATCT (see Connected Actions). Some Part 77 obstructions are also LOS obstructions between the new ATCT and Future Taxiway F.

Environmental Assessment for New Airport Traffic Control Tower and Associated Improvements at BWI Marshall Airport

Scoping Information Package

The Proposed Action projects are **needed** to address the following issues:

A **New ATCT** is needed to replace the existing ATCT which was constructed in the 1970s. The existing ATCT is beyond its useful life, is physically too small and does not meet ADA requirements. The new ATCT is needed to replace outdated facilities with an adequately sized, code compliant facility that meets the current FAA tower operational (i.e., staffing and equipment) and design standards. Additionally, the existing ATCT has LOS issues which interfere with Airport Traffic Control (ATC).

FAA Staffing Offices are needed to meet staffing needs of the FAA that cannot be accommodated within the ATCT.

Removal of Part 77 obstructions are needed to meet FAA standards for a safe and navigable airspace. Vegetation obstructions penetrate Part 77 surfaces in the area directly north of the realigned Taxiway F and adjacent to LOS obstructions associated with the new ATCT (see *Connected Actions*). Some obstructions in this area are considered both Part 77 and LOS obstructions.

A **Hotel** is needed to provide a high level of service to BWI Airport users through meeting their hospitality and meeting space demands. There are currently no hotels within a convenient walking distance of the main terminal. Additionally, an airport hotel would provide revenue generation and further promote BWI Marshall as the airport of choice in the region.

Connected Actions

Supplemental ATCT Upgrades are needed so that the existing, unused ramp control tower can function as a supplemental ATCT by providing adequate airfield LOS coverage during construction of the C-D Connector and ATCT Program.

LOS Vegetation Obstruction Removal is needed to clear LOS obstructions to the end of Future Taxiway F from the existing and new ATCT. The realignment of Taxiway F (environmentally approved in the *Final EA and Section 4(f) Determination for Airport Layout Plan Phase I Improvements at BWI Marshall Airport* dated November 2020) has been broken into phases for construction and funding purposes, construction of Phase 1, between Taxiways 'G' and 'F1' is nearing completion. The remaining phases are currently under design and construction is anticipated to be completed in 2024. Existing vegetation in the area directly north of Taxiway F and directly west of Runway 15R will obstruct the ability of Air Traffic Control (ATC) to see aircraft operating on the realigned Taxiway F from both the existing ATCT and proposed new ATCT. LOS vegetation obstructions between the existing ATCT and end of future Taxiway F would need to be removed in order for the existing ATCT to safely function during construction of the proposed new ATCT.

Environmental Assessment for New Airport Traffic Control Tower and Associated Improvements at BWI Marshall Airport

Scoping Information Package

Preliminary Alternatives

Analysis of alternatives is key to the NEPA process. The EA will include consideration of reasonable alternatives to the Proposed Action. The number of alternatives considered will be influenced by the degree of potential impact as well as the stated purpose and need. The EA will consider potential alternatives based on the alternative's ability to meet the purpose and need of the Proposed Action. Alternatives which have been analyzed and reviewed as part of existing studies will be discussed in the EA. It is anticipated that at a minimum the following alternatives will be considered:

- *No Action Alternative* - Consideration of the No Action Alternative is required by NEPA per the Council on Environmental Quality (CEQ) Regulations. The No Action Alternative represents the Airport without the improvements included in the Proposed Action. However, the No Action Alternative would include removal of LOS issues with the existing ATCT to accommodate the future completion of Taxiway F.
- *Proposed Action Alternative* – This alternative includes the new ATCT (Site 1A, as determined through review by FAA Airway Facilities Tower Integration Laboratory [AFTIL]), FAA offices, Part 77 obstruction removal, new Hotel, and connected actions: Supplemental ATCT upgrades to the existing but unused ramp control tower, and LOS obstruction removal between the existing and new ATCT and the end of future Taxiway F as illustrated on Figure 1.

Environmental Analysis

The EA will assess the environmental consequences of the Proposed Action and reasonable alternatives. All categories of impact will be considered according to the criteria included in FAA Orders 1050.1F and 5050.4B. Impact analyses will be conducted for the first full year of implementation (2030) of the improvements and five years thereafter.

While all of the environmental impact categories identified in FAA Orders 1050.1F and 5050.4B will be addressed in the EA, the major emphasis is expected to be on those categories listed below. Preliminary review of the affected environment and available materials indicated that these categories may require detailed analysis.

- Air Quality and Climate
 - *Review of potential construction emissions impacts*
- Biological Resources
 - *Review of potential impacts due to vegetation removal and potential impacts to threatened and endangered species due to vegetation removal*
- Department of Transportation, Section 4(f)
 - *Review of viewshed with consideration of new ATCT and 4(f) resources*
- Historical, Architectural, Archeological, and Cultural Resources
 - *Review of viewshed with consideration of new ATCT and historic resources*
- Visual Effects
 - *Review of viewshed with consideration of new ATCT*
- Water Resources, including wetlands, floodplains, and surface waters
 - *Review of potential impacts to non-tidal wetlands due to vegetative removal*

**Environmental Assessment for New Airport Traffic Control Tower
and Associated Improvements at BWI Marshall Airport**

Scoping Information Package

Preliminary review indicated that the following categories may be impacted and some analysis may be required.

- Coastal Resources
- Land Use
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Noise and Noise-Compatible Land Use
- Natural Resources and Energy Supply
- Socioeconomic Impacts, Environmental Justice, and Children’s Environmental Health and Safety Risks
- Cumulative Impacts

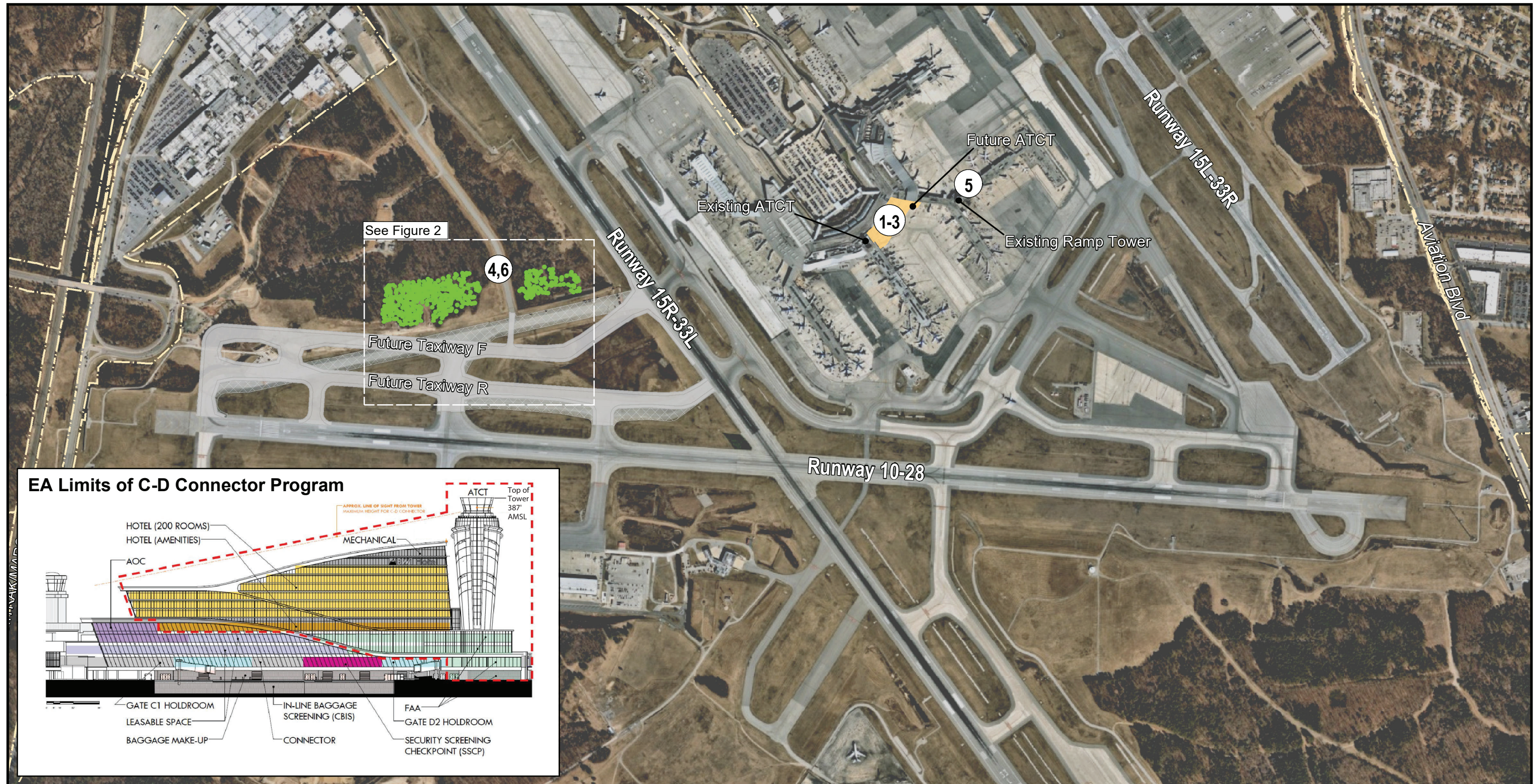
Farmlands are not present in or around BWI Marshall Airport and will require no analysis. The EA will provide succinct documentation as to why this resource will not be affected.

The anticipated level of analysis for the resource categories is based on preliminary review of the affected environment. Ongoing field studies, detailed analyses and agency consultation will determine the appropriate level of analysis for each resource category.

Preliminary Schedule

The EA is anticipated to take approximately nine months to complete. Major milestones are depicted on the following schedule. Note that there will be another opportunity to participate in the development of the EA during the Draft EA Comment Period. It is anticipated that the Draft EA will be available for agency and public review and comment in October 2023. Comments on the Draft EA will be addressed as part of the preparation of the Final EA.

TASK	2023							2024	
	June	July	August	September	October	November	December	January	February
Scoping									
Impact Analysis									
Draft EA									
Draft EA Comment Period									
Response to Comments									
Final EA/ NEPA Finding									



LEGEND

- EA Limits of C-D Connector Program
- C-D Connector Program
- Future Taxiway Alignment
- Future Taxiway Pavement Demolition
- MDOT MAA Property

- Vegetative Obstruction Removal* (Projects #4 and 6)

*See **Figure 2: Proposed Action – Obstruction Removal** for a detailed view of the Part 77 and ATCT LOS obstructions.

Proposed Action Projects

- 1 New Airport Traffic Control Tower (ATCT)
- 2 FAA Staffing Offices
- 3 Hotel
- 4 Part 77 Obstruction Removal

Connected Action Projects




- 5 Supplemental ATCT Upgrades
- 6 ATCT LOS Obstruction Removal

Proposed Action Figure 1








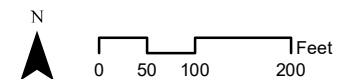
LEGEND

-  Future Taxiway F and R Alignment
-  Future Taxiway Pavement Demolition
-  MDOT MAA Property

Vegetative Obstruction Removal

-  Existing ATCT LOS Obstructions
-  Future ATCT LOS Obstructions
-  Part 77 Obstructions

Proposed Action - Obstruction Removal
Figure 2



BWI ATCT EA - Agency Scoping Contact List

Title	First Name	Last Name	Position	Company Name	Address Line 1	Address Line 2	City	State	ZIP Code	Email
Mr.	Ray	Li	Transportation Liaison	US Fish and Wildlife Service	Chesapeake Bay Field Office	177 Admiral Cochran Drive	Annapolis	MD	21401	Ray_li@fws.gov
Mr.	Trevor	Clark	Endangered Species Biologist	US Fish and Wildlife Service	Chesapeake Bay Field Office	177 Admiral Cochran Drive	Annapolis	MD	21401	Trevor_clark@fws.gov
Mr.	Joseph P.	DaVia	Chief, Maryland Section Northern	U.S Army Corps of Engineers, Baltimore District		2 Hopkins Plaza	Baltimore	MD	21201	joseph.davia@usace.army.mil
Ms.	Abbie	Hopkins		U.S. Army Corps of Engineers	Regulatory Division	10 South Howard Street	Baltimore	MD	21203	abbie.hopkins@usace.army.mil
Mr.	KC	Kerr	Wildlife Biologist	US Department of Agriculture	Wildlife Services	1568 Whitehall Road	Annapolis	MD	21401	KKerr@bwiairport.com
Ms.	Michelle	Martin	Deputy Director	Maryland Department of Transportation	Office of Planning and Capital Programming	7201 Corporate Center Drive, P.O. Box 548	Hanover	MD	21076	mmartin@mdot.maryland.gov
Ms.	Danielle	Spendiff	Federal Consistency Coordinator	Maryland Department of the Environment		1800 Washington Boulevard	Baltimore	MD	21230	Danielle.Spendiff1@maryland.gov
Mr.	Roger	Thunell	Program Manager	Maryland Department of the Environment	Air Quality Planning Program	1800 Washington Boulevard	Baltimore	MD	21230	roger.thunell@maryland.gov
Ms.	Cheryl	Kerr	Program Reviewer - Anne Arundel County	Maryland Department of the Environment	Nontidal Wetlands and Waterways Division	1800 Washington Boulevard	Baltimore	MD	21230	cheryl.kerr@maryland.gov
Mr.	Horace	Henry	Urban Forestry Coordinator	Maryland Department of Natural Resources	Forest Service	8023 Long Hill Road	Pasadena	MD	21122	horace.henry@maryland.gov
Ms.	Lori	Byrne	Environmental Review Specialist	Maryland Department of Natural Resources	Wildlife and Heritage Division	580 Taylor Avenue, E-1	Annapolis	MD	21401	lori.byrne@maryland.gov
Ms.	Kathy	McCarthy	Southern Region Ecologist	Maryland Department of Natural Resources	Wildlife and Heritage Division	580 Taylor Avenue, E-1	Annapolis	MD	21401	katharine.mccarthy@maryland.gov
Ms.	Beth	Cole	Administrator, Review and Compliance	Maryland Historical Trust	Division of Historical and Cultural Programs	100 Community Place	Crownsville	MD	21032	beth.cole@maryland.gov
				Ann Arrundell County Historical Society		PO Box 385	Linthicum	MD	21090	info@aachs.org
Ms.	Jessica	Leys	Director	Anne Arundel County Department of Recreation and Parks		1 Harry S Truman Parkway	Annapolis	MD	21401	rpleys00@aacounty.org
Ms.	Christina	Pompa	Deputy Planning and Zoning Officer	Anne Arundel County Office of Planning and Zoning		2664 Riva Road, 4th Floor	Annapolis	MD	21401	pzpomp22@aacounty.org
Ms.	Lynda	Eisenberg	Director	Howard County Department of Planning & Zoning		3430 Court House Drive	Ellicott City	MD	21043	leisenberg@howardcountymd.gov

Attachment 2:
Agency Scoping Responses

From: Beth Cole - MHT <beth.cole@maryland.gov>

Sent: Tuesday, July 11, 2023 12:01 PM

To: Kevin Clarke <KClarke@bwiairport.com>

Subject: Re: BWI Marshall Airport - Environmental Assessment - Draft Agency Scoping Package

Hi Kevin,

Thank you for including the Maryland Historical Trust (MD SHPO) in the agency scoping notification for the proposed new Airport Traffic Control Tower (ATCT) and associated improvements at BWI Marshall Airport [MHT Log #202302667]. The Trust would be involved in the review of the proposed improvements for effects to historic and archeological properties, pursuant to Section 106 of the National Historic Preservation Act of 1966 and the Maryland Historical Trust Act of 1985. Given the substantive increase in the height of the proposed new tower, MAA will need to consider the possible visual effects of the tower on historic properties in the area of potential effects, in addition to the direct effects of the undertaking, if any. We look forward to further consultation with MAA and other involved parties to complete the historic preservation review of this undertaking as project planning progresses.

Let me know if you have questions or need further assistance. Thanks again for providing us this opportunity for early comment.

Beth Cole

To check on the status of a submittal, please use our online search:
<https://mht.maryland.gov/compliance/ComplianceLogSearch.aspx>.



Beth Cole

Administrator, Project Review and Compliance
Maryland Historical Trust
Maryland Department of Planning
100 Community Place
Crownsville, MD 21032
beth.cole@maryland.gov / 410-697-9541
MHT.Maryland.gov

We want to hear from you! Please [take our survey](#) to shape the future of preservation in Maryland.

On Wed, Jun 28, 2023 at 2:03 PM Kevin Clarke <KClarke@bwiairport.com> wrote:

Hello everyone,

I hope you're getting ready for a great 4th of July weekend!

The Maryland Aviation Administration (MAA) is initiating preparation of the Environmental Assessment (EA) to evaluate and disclose the potential environmental impacts associated with a **new Airport Traffic Control Tower (ATCT) and associated improvements at BWI Marshall Airport**. MAA invites your agency to participate in the scoping process for this EA. The attached Scoping Information Package includes background information; describes the Proposed Action; presents the preliminary purpose and need and alternatives; identifies the environmental impact categories most likely impacted; and provides a preliminary schedule.

MAA encourages you to review these materials and provide comments by **Monday, July 31st**. Comments provided by this time will assist the MAA in identifying issues early in the development of the EA. You are welcome to submit comments either by mail at the below address or by email to kclarke@bwiairport.com. Additionally, a hard copy of this scoping information package will be mailed via USPS this week.

Mr. Kevin Clarke
Director, Office of Planning & Environmental Services
Division of Planning & Engineering
Maryland Aviation Administration
PO Box 8766
BWI Airport, MD 21240-0766

Any questions, please call me at the numbers listed below.

Cheers,
Kevin

Kevin Clarke | Director

Office of Planning & Environmental Services

Division of Planning & Engineering

MDOT Maryland Aviation Administration

O: 410.859.7787 | C: 410.693.6117

PO Box 8766, BWI Airport, MD 21240-0766

kclarke@bwiairport.com



[Maryland now features 511 traveler information!](#)

[Visit: www.md511.org](http://www.md511.org)



Please consider the environment before printing this email

LEGAL DISCLAIMER - The information contained in this communication (including any attachments) may be confidential and legally privileged. This email may not serve as a contractual agreement unless explicit written agreement for this purpose has been made. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication or any of its contents is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender indicating that it was received in error and delete the original message and any copy of it from your computer system.



Mr. Kevin Clarke
Director, Office of Planning and Engineering
Maryland Aviation Administration
BWI Airport, MD 21240-0766

July 17, 2023

Re: Baltimore/Washington International Thurgood Marshall (BWI) Airport New Airport Traffic Control Tower (ATCT) Environmental Assessment Analysis

The Maryland Department of the Environment (MDE) Air and Radiation Administration (ARA) appreciates the opportunity to comment on the *Environmental Assessment for New Airport Traffic Control Tower and Associated Improvements at BWI Marshall Airport Scoping Information Package*, dated June 28, 2023, that provides an introduction to the scope of work and need for analysis of air quality in the construction of the new ATCT, additional operational space, a new hotel, and Part 77 obstruction removal.

To date, Maryland has three nonattainment areas encompassing BWI Marshall Airport. This includes the Baltimore 8-Hour Ozone Nonattainment area (for both the 2008 and 2015 standards) and the Anne Arundel and Baltimore County SO₂ Nonattainment Area. The BNAA is classified as a moderate area under the 2015 8-hour standard, and the entire state of Maryland is located within the Ozone Transport Region (OTR). In November 2022 the Environmental Protection Agency (EPA) finalized a Clean Data Determination (CDD) for The Anne Arundel-Baltimore County SO₂ Nonattainment Area.

In this scoping phase, MDE would like to highlight that the air quality analysis methodology outlined in the document is lacking sufficient details to comment upon in a thorough manner. MDE expects that a revised plan will be shared in the future after a detailed outline for the construction plan has been determined. MDE looks forward to the air quality analysis that will be performed on the ATCT and associated improvements to evaluate the differences in air quality impacts, both short-term during construction, as well as long-term.

There are a several elements that MDE would like to highlight as critical as the study moves forward:

General Conformity

BWI Airport is located within multiple nonattainment areas. As such, the Clean Air Act's General Conformity requirements (section 176(c)(4)) apply to the project. General Conformity ensures that the actions taken by federal agencies, such as airport construction, do not interfere with a state's plans to attain and maintain national standards for air quality. The de-minimis levels for a general conformity demonstration can be found here: <https://www.epa.gov/general-conformity/de-minimis-tables>. For additional General Conformity information refer to the following Federal Register

notices for more information: 40 CFR Parts 51 and 93, July 17, 2006.

If a project receives federal funding, approvals and/or permits and will be located in a nonattainment area or maintenance area, the applicant needs to determine whether emissions from the project will cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS) by exceeding the de minimis threshold levels identified in the federal rule on general conformity. Under the General Conformity rule, federal agencies must work with state, tribal and local governments in a nonattainment or maintenance area to ensure that federal actions conform to the air quality plans established in the applicable state or tribal implementation plan.

Environmental Justice (EJ)

Communities with environmental justice (EJ) concerns bear a disproportionate share of the negative environmental consequences resulting from industrial activities, land-use planning and zoning, municipal and commercial operations or the execution of federal, state, local programs and policies. MDE is committed to the goal of achieving environmental equity for all Maryland residents. Accordingly, as MDE implements state laws and programs to protect and restore the environment, and reviews proposed projects; it is the policy of MDE to implement environmental laws and programs wherever possible in a manner that reduces existing inequities and avoids the creation of additional inequities in communities with EJ concerns.

MDE requests the inclusion of EJ impacts from this project be included in the project analysis..

More information can be found at MDE's EJ webpage:

https://mde.maryland.gov/Environmental_Justice/Pages/Landing%20Page.aspx

Potential Air Quality Impacts and Regulatory Requirements

The environmental assessment air quality analysis should include potential impacts of fugitive dust sources and emissions from equipment and truck use, soil disturbances, site and equipment maintenance, track out, paving off gasses, changes in traffic flow, paints and architectural coatings, and so on. Dust suppression techniques should be used during construction to reduce air pollution. Such techniques could include application of water, soil stabilizers, or vegetation; use of windbreak enclosures; use of covers on soil stockpiles and dump truck loads; use of silt fences; and suspension of earth-movement activities during high-wind conditions (i.e., gusts exceeding 25 miles per hour).

Additionally, construction activities should be conducted in compliance with Maryland regulatory requirements, through the use of compliant practices or products. These requirements appear in COMAR Title 26, Subtitle 11, Air Quality, and include the following: Particulate Matter from Materials Handling and Construction (COMAR 26.11.06.03.D); Visible Emissions (COMAR 23.22.06.02); Control of Emissions of Volatile Organic Compounds from Architectural Coatings (COMAR 26.11.35); and Control of Emissions of Volatile Organic Compounds from Consumer Products (COMAR 26.11.32).

Reconsideration of the Fine Particulate Matter (PM_{2.5}) NAAQS

MDE would like to draw attention to the EPA's efforts to reconsider the NAAQS for PM_{2.5}. On January 6, 2023, EPA announced a proposal to strengthen the federal standard for PM_{2.5} to better protect communities, including those most overburdened by pollution. The proposal considers

lowering the standard from 12 micrograms per cubic meter to a level between 9 and 10 micrograms per cubic meter; comments will also be taken at evaluating a range between 8 and 11 micrograms per cubic meter. It is important that this process be monitored should the area encompassing BWI be designated as nonattainment.

MDE appreciates the opportunity to comment on the *Environmental Assessment for New Airport Traffic Control Tower and Associated Improvements at BWI Marshall Airport Scoping Information Package* thus far and looks forward to reviewing the results of this study.

Conclusion

Again, thank you for the opportunity to review this draft document. If you have any questions or need further information, please do not hesitate to contact me or a member of my staff at (410) 537-3273.

Sincerely,

A handwritten signature in blue ink that reads "Roger E. Thunell". The signature is fluid and cursive, with the first name being the most prominent.

Roger E. Thunell
Program Manager, Air Quality Planning Program
Air and Radiation Administration



Wes Moore, Governor
Aruna Miller, Lt. Governor
Josh Kurtz, Secretary
David Goshorn, Deputy Secretary

July 24, 2023

Mr. Kevin Clarke
MDOT
MD Aviation Administration
P.O. Box 8766
BWI Airport, MD 21240-0766

RE: Environmental Review for BWI Marshall Airport New Airport Traffic Control Tower EA, Anne Arundel County, Maryland.

Dear Mr. Clarke:

The Wildlife and Heritage Service has no official records for State or Federal listed, candidate, proposed, or rare plant or animal species within the project area shown on the map provided. As a result, we have no specific concerns regarding potential impacts to such species or recommendations for protection measures at this time. If the project changes in the future such that the limits of proposed disturbance or overall site boundaries are modified, please provide us with revised project maps and we will provide you with an updated evaluation.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at lori.byrne@maryland.gov or at (410) 260-8573.

Sincerely,

Lori A. Byrne,
Environmental Review Coordinator
Wildlife and Heritage Service
MD Dept. of Natural Resources

ER# 2023.1026.aa

From: Kristopher Kerr <KKerr@bwiairport.com>

Sent: Thursday, July 27, 2023 9:04 AM

To: Kevin Clarke <KClarke@bwiairport.com>

Subject: RE: BWI Marshall Airport - Environmental Assessment - Draft Agency Scoping Package

Kevin,

With respect to review of the initial EA documents –

USDA would encourage MAA to consider the design of the ATCT tower and additional terminal structures, such that they don't provide overhangs or ledges which would encourage nesting or perching of birds. The current ATCT tower has had historical nesting/perching issues, which also led to issues with bird mites in the tower at one point in time.

USDA would also like to ensure that the planned vegetative Obstruction Removal does not result in open areas of standing water or exposed floodplains around kitten branch. The proposed vegetative removal northeast of the intersection of taxiway Foxtrot and taxilane Whiskey does look to open up overhead access to kitten branch, this may increase the attractiveness of the area to species such as Canada geese, mallards and Great-blue herons; we would obviously like avoid or plan to mitigate this issue if at all possible. This area also seems to backup a little more often than most, usually due to blocked downstream culverts, and/or from beavers which move upstream from off-airport locations. We do remove these beavers/dams and restore flow to the area once we become aware of them, but the combination of intermittent higher water levels and reduced cover may result in more waterfowl activity in the area.

Thank you for including us in this discussion, we look forward to assisting throughout the process wherever we can.

Thank you,

KC

Kristopher C. Kerr
Wildlife Biologist
USDA MD/DE/DC Wildlife Services
Baltimore-Washington Thurgood Marshall Airport
(443) 618-1849



From: Kevin Clarke <KClarke@bwairport.com>

Sent: Wednesday, June 28, 2023 2:04 PM

To: Ray_li@fws.gov; Trevor_clark@fws.gov; joseph.davia@usace.army.mil; abbie.hopkins@usace.army.mil; Kristopher Kerr <KKerr@bwairport.com>; Michelle Martin <mmartin@mdot.maryland.gov>; Danielle Spendiff -MDE- <danielle.spendiff1@maryland.gov>; diane.franks@maryland.gov; cheryl.kerr@maryland.gov; lori.byrne@maryland.gov; Katharine McCarthy -DNR- <katharine.mccarthy@maryland.gov>; beth.cole@maryland.gov; info@aachs.org; rpleys@aacounty.org; pzpomp22@aacounty.org; agowan@howardcountymd.org; horace.henry@maryland.gov

Cc: KHUGHES (KHUGHES@HNTB.com) <KHUGHES@HNTB.com>; Ryan Lombardi <rlombardi@HNTB.com>; Daniel Hinder <DHinder@bwairport.com>; Shawn Ames <sames@bwairport.com>; Genevieve J Walker <genevieve.j.walker@faa.gov>

Subject: BWI Marshall Airport - Environmental Assessment - Draft Agency Scoping Package

Hello everyone,

I hope you're getting ready for a great 4th of July weekend!

The Maryland Aviation Administration (MAA) is initiating preparation of the Environmental Assessment (EA) to evaluate and disclose the potential environmental impacts associated with a **new Airport Traffic Control Tower (ATCT) and associated improvements at BWI Marshall Airport.**

MAA invites your agency to participate in the scoping process for this EA. The attached Scoping Information Package includes background information; describes the Proposed Action; presents the preliminary purpose and need and alternatives; identifies the environmental impact categories most likely impacted; and provides a preliminary schedule.

MAA encourages you to review these materials and provide comments by **Monday, July 31st**. Comments provided by this time will assist the MAA in identifying issues early in the development of the EA. You are welcome to submit comments either by mail at the below address or by email to kclarke@bwairport.com. Additionally, a hard copy of this scoping information package will be mailed via USPS this week.

Mr. Kevin Clarke
Director, Office of Planning & Environmental Services
Division of Planning & Engineering
Maryland Aviation Administration
PO Box 8766
BWI Airport, MD 21240-0766

Any questions, please call me at the numbers listed below.

Cheers,
Kevin

Kevin Clarke | Director
Office of Planning & Environmental Services
Division of Planning & Engineering
MDOT Maryland Aviation Administration
O: 410.859.7787 | C: 410.693.6117
PO Box 8766, BWI Airport, MD 21240-0766
kclarke@bwiairport.com



From: Danielle Spendiff -MDE- <danielle.spendiff1@maryland.gov>

Sent: Thursday, August 3, 2023 11:24 AM

To: Kevin Clarke <KClarke@bwiairport.com>

Subject: Re: BWI Marshall Airport - Environmental Assessment - Draft Agency Scoping Package

Hi Kevin,

Apologies for not responding by 7/31- wanted to let you know I don't think MDE has anything to add for scoping that you aren't already aware of. If you have any questions though please feel free to contact me.

Thanks,

Danielle

On Wed, Jun 28, 2023 at 2:03 PM Kevin Clarke <KClarke@bwiairport.com> wrote:

Hello everyone,

I hope you're getting ready for a great 4th of July weekend!

The Maryland Aviation Administration (MAA) is initiating preparation of the Environmental Assessment (EA) to evaluate and disclose the potential environmental impacts associated with a **new Airport Traffic Control Tower (ATCT) and associated improvements at BWI Marshall Airport**. MAA invites your agency to participate in the scoping process for this EA. The attached Scoping Information Package includes background information; describes the Proposed Action; presents the preliminary purpose and need and alternatives; identifies the environmental impact categories most likely impacted; and provides a preliminary schedule.

MAA encourages you to review these materials and provide comments by **Monday, July 31st**.

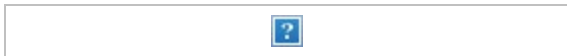
Comments provided by this time will assist the MAA in identifying issues early in the development of the EA. You are welcome to submit comments either by mail at the below address or by email to kclarke@bwiairport.com. Additionally, a hard copy of this scoping information package will be mailed via USPS this week.

Mr. Kevin Clarke
Director, Office of Planning & Environmental Services
Division of Planning & Engineering
Maryland Aviation Administration
PO Box 8766
BWI Airport, MD 21240-0766

Any questions, please call me at the numbers listed below.

Cheers,
Kevin

Kevin Clarke | Director
Office of Planning & Environmental Services
Division of Planning & Engineering
MDOT Maryland Aviation Administration
O: 410.859.7787 | C: 410.693.6117
PO Box 8766, BWI Airport, MD 21240-0766
kclarke@bwiairport.com



[Maryland now features 511 traveler information!](#)
[Visit: www.md511.org](http://www.md511.org)



Please consider the environment before printing this email

LEGAL DISCLAIMER - The information contained in this communication (including any attachments) may be confidential and legally privileged. This email may not serve as a contractual agreement unless explicit written agreement for this purpose has been made. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication or any of its contents is strictly prohibited. If you have received this communication in error, please re-send this communication to the sender indicating that it was received in error and delete the original message and any copy of it from your computer system.

--

| **Danielle A. Spendiff**

Chief, Regulatory & Customer Service Division
Federal Consistency Coordinator
Water & Science Administration
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
danielle.spendiff1@maryland.gov
410-537-4023 (O)
410-913-8524 (M)
[Website](#) | [Facebook](#) | [Twitter](#)

Click here to complete a three question [customer experience survey](#).