



ROANOKE-
BLACKSBURG
REGIONAL
AIRPORT



DRAFT SHORT ENVIRONMENTAL ASSESSMENT FORM

for Proposed Property Acquisition and Future Air Cargo Development



Prepared For: Roanoke Regional Airport Commission
September 15, 2021

PARRISH & PARTNERS

Draft Short Environmental Assessment Form (SEAF) for the Nordt Property Acquisition at Roanoke-Blacksburg Regional Airport (ROA)

The Federal Aviation Administration has completed its review of the revised draft SEAF for the Nordt Property Acquisition at ROA. Please distribute the draft SEAF for public review.

In compliance with CEQ regulation 1506.6, the FAA requires that the draft SEAF be distributed for a thirty (30) day public review, both electronically, and at locations such as the airport administrative offices and local libraries. The draft SEAF must also be distributed to the appropriate federal, state, and local agencies for review and comment.

A NOA for the draft SEAF must be published in a newspaper of general circulation serving the project area. We request that you provide this office with one copy of the proof of publication from the newspaper. If you have any questions or comments, please feel free to contact me via email or at the telephone number below.

Thank you,

Susan B. Stafford
Environmental Protection Specialist
Beckley Airports Field Office
176 Airport Circle, Rm 101
Beaver, WV 25813
304-252-6216 x 130



FEDERAL AVIATION ADMINISTRATION

EASTERN REGION
AIRPORTS DIVISION

**Short Environmental
Assessment Form
for
AIRPORT DEVELOPMENT
PROJECTS**



Airport Name: Roanoke-Blacksburg Regional Airport

Identifier: ROA

Project Title: Proposed Property Acquisition and Future Air Cargo Development

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

Responsible FAA Official

Date

INSTRUCTIONS

THIS FORM IS FOR LIMITED USE ON SPECIFIC TYPES OF PROJECTS. AIRPORT SPONSORS MUST CONTACT YOUR LOCAL AIRPORTS DISTRICT OFFICE (ADO) ENVIRONMENTAL PROTECTION SPECIALIST (EPS) BEFORE COMPLETING THIS FORM.

This form was prepared by FAA Eastern Region Airports Division and can only be used for proposed projects in this region.

Introduction: This Short Environmental Assessment (EA), is based upon the guidance in Federal Aviation Administration (FAA) Orders 1050.1F – *Environmental Impacts: Policies and Procedures*, and the *Environmental Desk Reference for Airport Actions* and 5050.4B – *NEPA Implementing Instructions for Airport Actions*. These orders incorporate the Council on Environmental Quality's (CEQ) regulations for implementing the National Environmental Policy Act (NEPA), as well as US Department of Transportation environmental regulations, and other applicable federal statutes and regulations designed to protect the Nation's natural, historic, cultural, and archeological resources. The information provided by sponsors, with potential assistance from consultants, through the use of this form enables the FAA ADO offices to evaluate compliance with NEPA and the applicable special purpose laws.

Use: For situations in which this form may be considered, refer to the APPLICABILITY Section below. The local ADO has the final determination in the applicability of this form to a proposed Federal Action. Proper completion of the Form will allow the FAA to determine whether the proposed airport development project can be processed with a short EA, or whether a more detailed EA or EIS must be prepared. **If you have any questions on whether use of this form is appropriate for your project, or what information to provide, we recommend that you contact the environmental specialist in your local ADO.**

This Form is to be used in conjunction with applicable Orders, laws, and guidance documents, and in consultation with the appropriate resource agencies. Sponsors and their consultants should review the requirements of special purpose laws (See 5050.4B, Table 1-1 for a summary of applicable laws). Sufficient documentation is necessary to enable the FAA to assure compliance with all applicable environmental requirements. Accordingly, any required consultations, findings or determinations by federal and state agencies, or tribal governments, are to be coordinated, and completed if necessary, prior to submitting this form to FAA for review. Coordination with Tribal governments must be conducted through the FAA. We encourage sponsors to begin coordination with these entities as early as possible to provide for sufficient review time. Complete information will help FAA expedite its review. This Form meets the intent of a short EA while satisfying the regulatory requirements of NEPA for an EA. Use of this form acknowledges that all procedural requirements of NEPA or relevant special purpose laws still apply and that this form does not provide a means for circumvention of these requirements.

Submittal: When using this form for an airport project requesting *discretionary funding*, the documentation must be submitted to the local ADO by April 30th of the fiscal year preceding the fiscal year in which funding will be requested. When using this form for an airport project requesting *entitlement funding*, the documentation must be submitted to the local ADO by November 30th of the fiscal year in which the funding will be requested.

Availability: An electronic version of this Short Form EA is available on-line at <http://www.faa.gov/airports/eastern/environmental/media/C10.DOC>. Other sources of environmental information including guidance and regulatory documents are available on-line at http://www.faa.gov/airports_airtraffic/airports/environmental.

APPLICABILITY

Local ADO EPSs make the final determinations for the applicability of this form. If you have questions as to whether the use of this form is appropriate for your project, contact your local EPS BEFORE using this form. Airport sponsors can consider the use of this form if the proposed project meets either Criteria 1 or Criteria 2, 3, and 4 collectively as follows:

- 1) It is normally categorically excluded (see paragraphs 5-6.1 through 5-6.6 in FAA Order 1050.1F) but, in this instance, involves at least one, but no more than two, extraordinary circumstance(s) that may significantly impact the human environment (see paragraph 5-2 in 1050.1F and the applicable resource chapter in the 1050.1F Desk reference).
- 2) The action is one that is not specifically listed as categorically excluded or normally requires an EA at a minimum (see paragraph 506 in FAA Order 5050.4B).
- 3) The proposed project and all connected actions must be comprised of Federal Airports Program actions, including:
 - (a) Approval of a project on an Airport Layout Plan (ALP),
 - (b) Approval of Airport Improvement Program (AIP) funding for airport development,
 - (c) Requests for conveyance of government land,
 - (d) Approval of release of airport land, or
 - (e) Approval of the use of Passenger Facility Charges (PFC).
- 4) The proposed project is not expected to have impacts to more than two of the resource categories defined in the 1050.1F Desk Reference.

This form cannot be used when any of the following circumstances apply:

- 1) The proposed action, including all connected actions, requires coordination with or approval by an FAA Line of Business or Staff Office other than the Airports Division. Examples include, but are not limited to, changes to runway thresholds, changes to flight procedures, changes to NAVAIDs, review by Regional Counsel, etc.
- 2) The proposed action, including all connected actions, requires coordination with another Federal Agency outside of the FAA.
- 3) The proposed action will likely result in the need to issue a Record of Decision.
- 4) The proposed action requires a construction period exceeding 3 years.

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- 5) The proposed action involves substantial public controversy on environmental grounds.
 - 6) The proposed project would have impacts to, or require mitigation to offset the impacts to more than two resources¹ as defined in the 1050.1F Desk Reference.
 - 7) The proposed project would involve any of the following analyses or documentation:
 - a. The development of a Section 4(f) Report for coordination with the Department of the Interior,
 - b. The use of any Native American lands or areas of religious or cultural significance,
 - c. The project emissions exceed any applicable *de minimis* thresholds for criteria pollutants under the National Ambient Air Quality Standards, or
 - d. The project would require noise modeling with AEDT 2b (or current version).

If a project is initiated using this form and any of the preceding circumstances are found to apply, the development of this form must be terminated and a standard Environmental Assessment or Environmental Impact Statement (if applicable) must be prepared.

¹ A resource is any one of the following: Air Quality; Biological Resources (including Threatened and Endangered Species); Climate; Coastal Resources; Section 4(f); Farmlands; Hazardous Materials, Solid Waste, and Pollution Prevention; Historical, Architectural, Archaeological, and Cultural Resources; Land Use; Natural Resources and Energy Supply; Noise and Noise-Compatible Land Use; Socioeconomics; Environmental Justice; Children's Environmental Health and Safety Risks; Visual Effects; Wetlands; Floodplains; Surface Waters; Groundwater; Wild and Scenic Rivers; and Cumulative Impacts.

Complete the following information:**Project Location**

Airport Name: Roanoke-Blacksburg Regional Airport Identifier: ROA
Airport Address: 5202 Aviation Drive NW
City: Roanoke County: Roanoke State: VA Zip: 24012

Airport Sponsor Information

Point of Contact: Mr. David Jeavons, CPA, Director of Finance and Administration
Address: 5202 Aviation Drive, NW
City: Roanoke State: VA Zip: 24012
Telephone: (540) 362-1999 ext. 284 Fax:
Email: David.Jeavons@flyroa.com

Evaluation Form Preparer Information

Point of Contact: Ms. Laura Stevens, AICP
Company (if not the sponsor): Parrish and Partners, LLC
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1. Introduction/Background:

The Roanoke-Blacksburg Airport, also known by the Federal Aviation Administration (FAA) identifier ROA, is located in Roanoke, Virginia, in the midwestern portion of the state (refer to **Figure 1**). The airport can be accessed from S-101 (Hershberger Road) via Aviation Drive NW and is located north of the interchange of Interstate 581 with Hershberger Road. This publicly owned and towered Airport is served by the 6,800-foot long Runway 6-24 and the 5,810 foot-long Runway 16-34, which currently support approximately 53,000 annual operations and nearly 350,000 enplanements.² Airport users include commercial, corporate, general aviation, and military aircraft.

This EA will document the potential impacts associated with the proposed acquisition of a 7.97-acre parcel (Nordt Property) for the future development of an air cargo facility. ROA currently has two cargo tenants, FedEx and UPS. With each tenant conducting two operations per day, five and six days per week respectively, cargo operations account for an estimated 1,144 annual operations, or approximately 2.1 percent of total aircraft operations at ROA. One of the aircraft used by cargo operators is the Boeing 757-200, which is also designated as the critical aircraft at ROA. The critical aircraft is an important element in aviation planning, as it sets the dimensional requirements for airfield design and the size of certain airfield safety areas. The critical aircraft is the most demanding aircraft type, or grouping of similar aircraft, regularly using the airport.

² FAA, APO Terminal Area Forecast Detail Report, ROA Forecast Issued January 2020.

As ROA is a federally obligated airport and federal funds may be utilized for the proposed property acquisition, the project is being evaluated to ensure that the action meets the requirements of the *National Environmental Policy Act* (NEPA). The proposed site, street address 1420 Coulter Drive NW and located southeast of Runway 6-24, is partially wooded to the north and includes a manufacturing building, former aircraft hangar, vehicular parking, and grassed/landscaped areas. The proposed site is currently leased and used as a jewelry manufacturer/offices. The facility is a conditionally exempt small quantity generator, meaning it generates no more than 220 pounds of hazardous waste monthly and meets other guidelines set by the US Environmental Protection Agency (EPA).

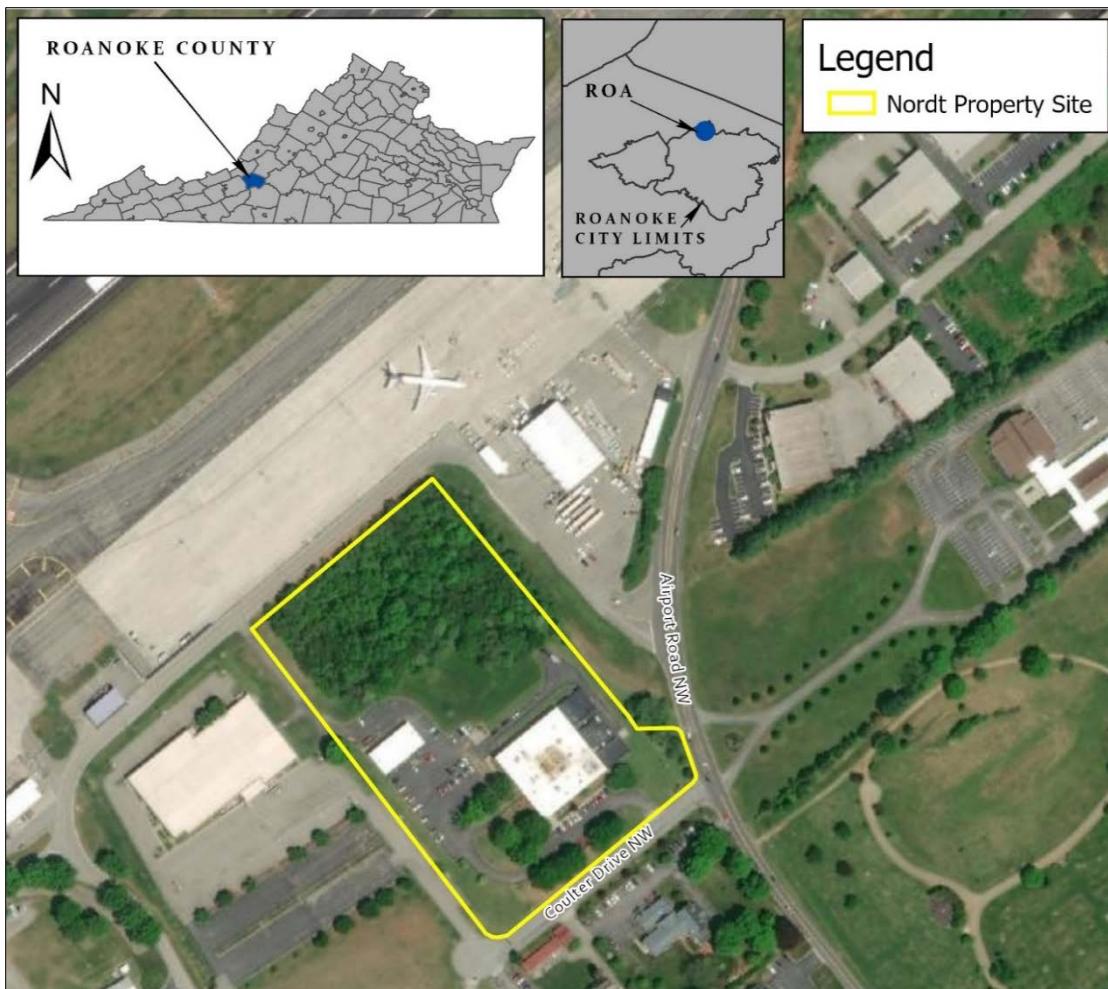


Figure 1: Project Site and Location Map

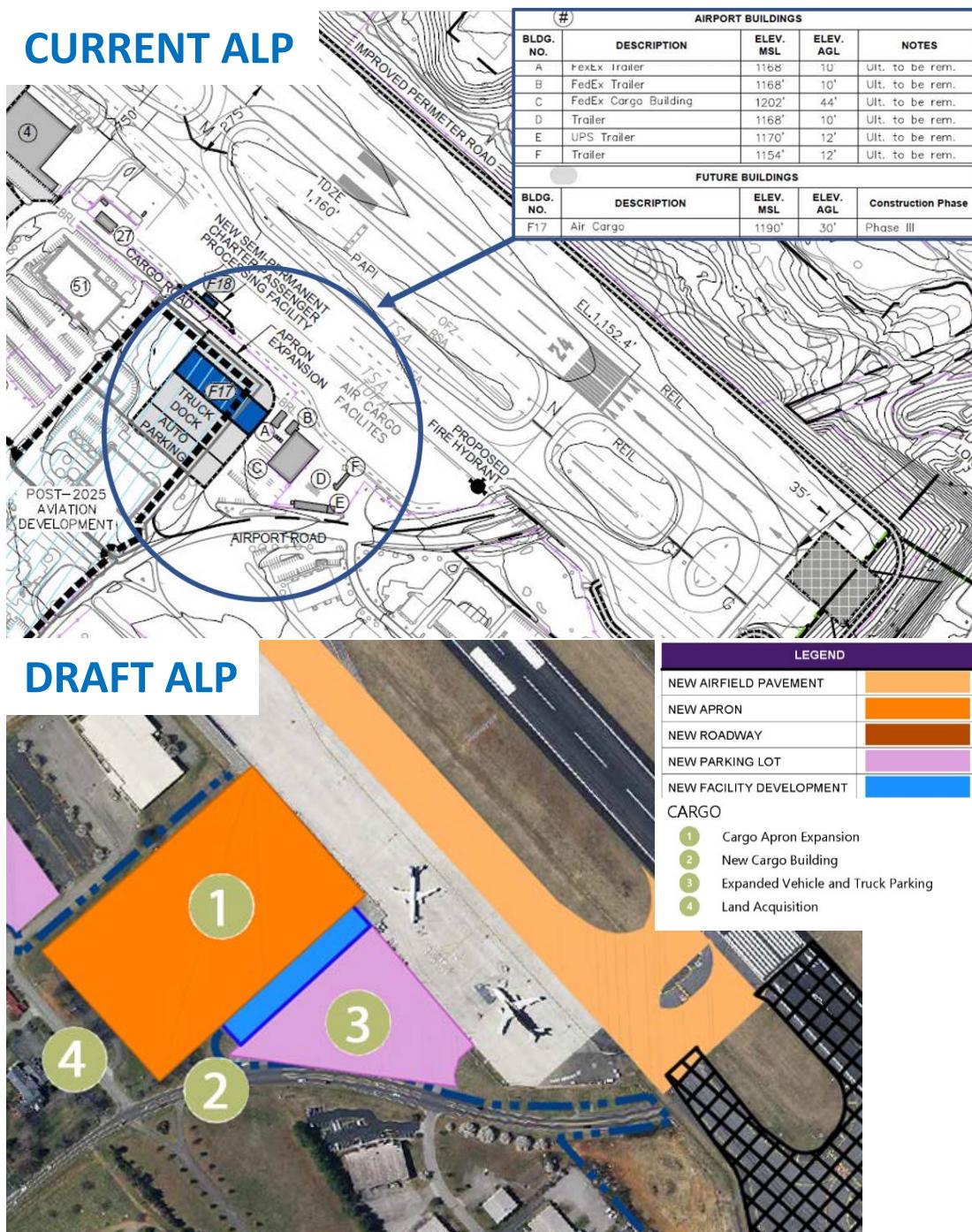
2. Project Description (List and clearly describe ALL components of project proposal including all connected actions). **Attach a map or drawing of the area with the location(s) of the proposed action(s) identified:**

ROA proposes to acquire property located southeast of Runway 6-24, adjacent to Airport Road NW and accessible by Coulter Drive NW. Project components include:

- acquisition of a 7.97-acre parcel (Nordt Property)

- future development of the site for air cargo operations as identified on the current Airport Layout Plan (approximately 35,000-square foot air cargo building, 33,250-square foot apron expansion, and 70,000-square foot truck dock and vehicular parking lot; refer to **Figure 2**). The site is also identified for future cargo development on the draft Airport Layout Plan (ALP) being completed as part of the ongoing Master Plan Update.

Figure 2: Portions of Current ALP (Nov. 2009 through Revision 4, Feb. 2020) and Draft ALP (March 2021)



As shown in the "Notes" (**Figure 2**), the current ALP calls for the ultimate removal of the existing cargo building and trailers (Buildings A through F) located adjacent to the site to be acquired. Although there are no specific plans for the demolition or reuse of the existing buildings on the proposed site, the draft ALP does indicate removal of these structures for cargo apron expansion (refer to **Figure 2, Area "1"**). The proposed acquisition would result in one business relocation.

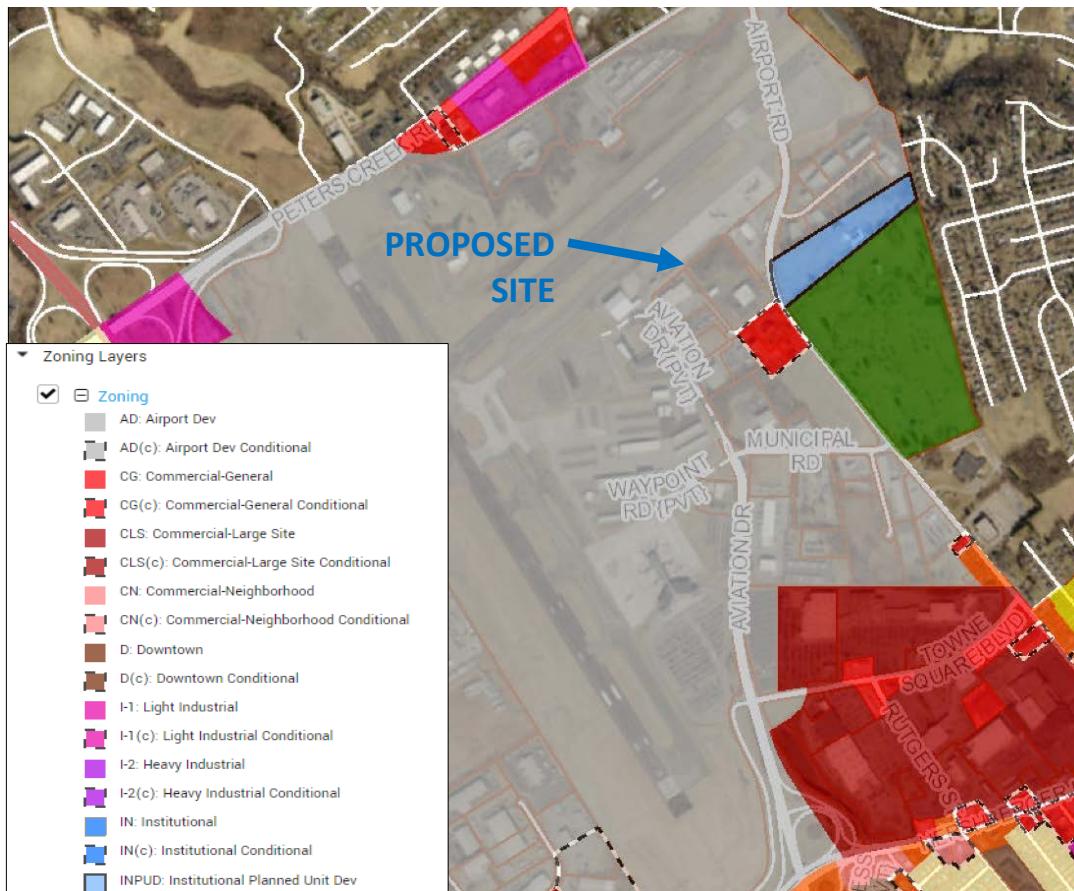
3. Project Purpose and Need:

The purpose of the proposed project is to acquire an adjacent parcel of property for development of future airport facilities. The parcel is bordered on three sides by existing airport property. As depicted in **Figure 2**, the property to be acquired is located adjacent to existing UPS and FedEx cargo facilities and is identified for future air cargo development. The proposed project is needed to accommodate future airport development as identified on the ROA ALP (current and draft versions).

4. Describe the affected environment (existing conditions) and land use in the vicinity of project:

As discussed previously and shown in **Figure 1**, the northern portion of the proposed site is undeveloped and partially wooded. A manufacturing building, former aircraft hangar, and vehicular parking area are located to the south and the remainder of parcel is grassed/landscaped. The site is zoned Airport Development (AD; refer to **Figure 3**).

Figure 3: City of Roanoke Zoning for ROA (<https://gisre.roanokeva.gov/js/>)



The site elevation is highest at Coulter Drive NW and gently slopes downward toward the north, where it is bordered by the existing airfield and Runway 6-24. Land use surrounding the remaining portions of the site includes existing air cargo development, Airport Road NW, and New Life Christian Ministries (zoned Industrial Planned Unit Development) to the east, Coulter Drive NW and commercial businesses to the south (zoned Commercial-General Conditional), and an airport office building with associated vehicular parking on existing airport property to the west. The FAA's Virginia Regional Administrator's Field Office is located farther west on Municipal Road NW, adjacent to the general airport office building.

As depicted in **Figure 4**, the site is bordered by Airport Road (State Route [SR] 118). Based on information from the Virginia Department of Transportation (VDOT), traffic volumes on Airport Road range from an annual average daily traffic (AADT) volume of 6,200 vehicles on Segment 1, from Williamson Road (US 11) to Municipal Road, to 12,000 vehicles on Segment 3, from the Roanoke County/City of Roanoke boundary to Peters Creek Road (SR 117).

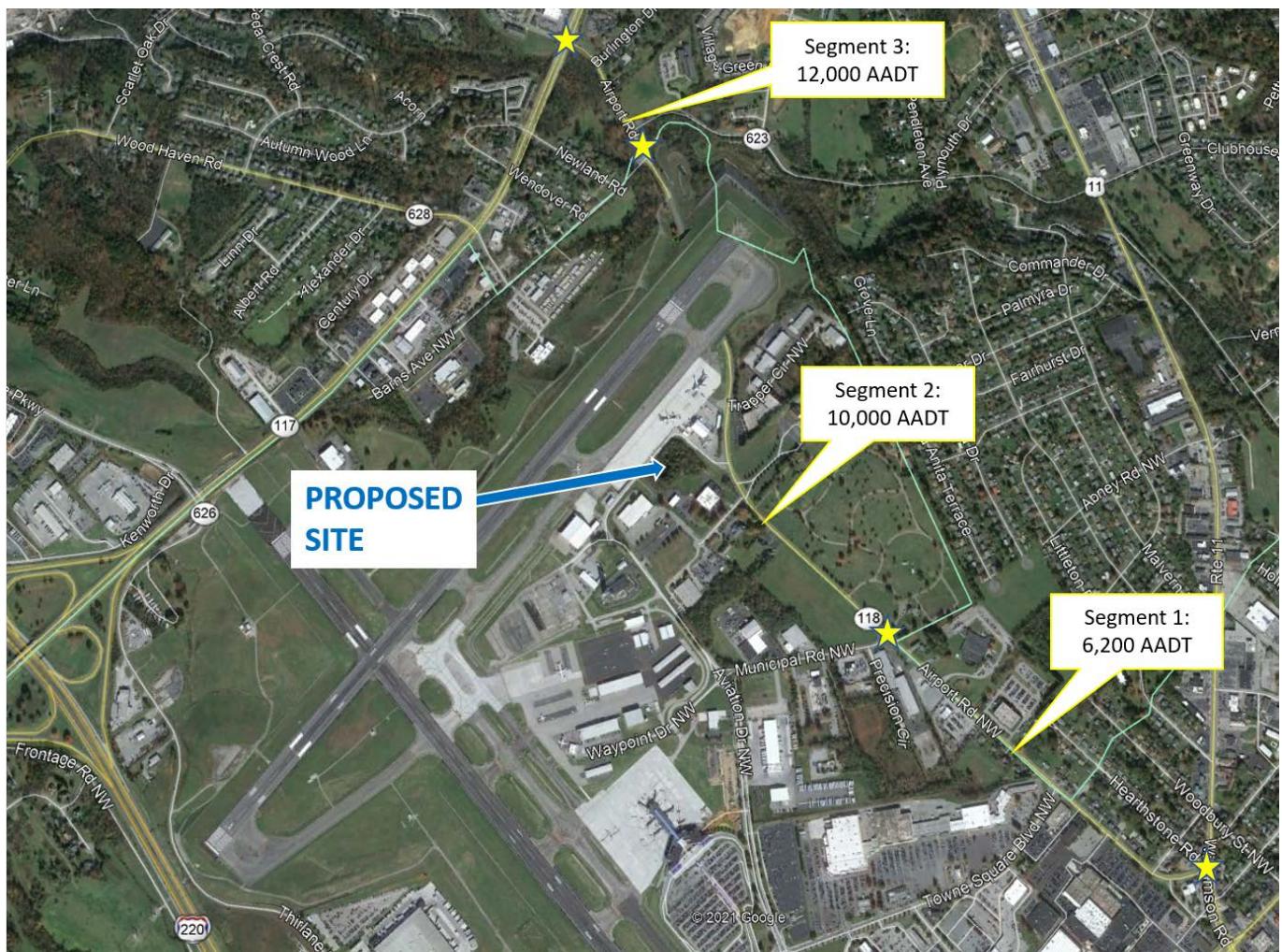


Figure 4: Annual Average Daily Traffic Estimates (https://www.virginiadot.org/info/resources/Traffic_2019/)

5. Alternatives to the Project: Describe any other reasonable actions that may feasibly substitute for the proposed project, and include a description of the “No Action” alternative. If there are no feasible or reasonable alternatives to the proposed project, explain why (attach alternatives drawings as applicable):

As described previously, the Nordt parcel is bordered by airport property on three sides. It is a pocket of non-airport property that has been identified for purchase and development by ROA, consistent with Airport Master Plan documents. No alternate sites were considered as the location best meets ROA's goals for future air cargo development by allowing for either expansion by existing cargo tenants or occupancy by a new tenant. Under the Preferred Alternative, the 7.97-acre site would be acquired by ROA for future development of an air cargo building, apron expansion, and additional truck/vehicular parking. The proposed site plan is depicted on the current ALP (**Figure 2**).

The No-action Alternative describes the existing condition of the Airport and is used as a baseline for comparison with the Preferred Alternative to determine potential impacts. Under the No-action Alternative, Roanoke-Blacksburg Regional Airport would not acquire the 7.97-acre parcel, nor would they develop additional air cargo facilities. With this Alternative, no action would be taken to meet the project's Purpose and Need of accommodating airport growth and development.

Proposed Action

The Preferred Alternative is identified as the Proposed Action for this EA in that it addresses the Purpose and Need of the project. Proposed Action components include:

- acquisition of a 7.97-acre parcel (Nordt property)
- future development of air cargo facilities (approximately 35,000-square foot air cargo building, 33,250-square foot apron expansion, and 70,000-square foot truck dock and vehicular parking lot)

Based on the current and draft versions of the ALP depicted in **Figure 2**, the proposed air cargo development would result in the addition of approximately 3.2 to 6.8 acres of impervious surfaces to the site and would be anticipated to take approximately 15 to 18 months to construct.

Proposed Federal Action

On October 5, 2018, HR 302, the FAA Reauthorization Act of 2018 (the Act) was signed into law (P.L. 115-254). Section 163(a) of the Act limits the FAA's authority to regulate an airport owner or operator's acquisition, use, lease, encumbrance, transfer, or disposal of land, any facility upon such land, or any portion of such land or facility. Responsibilities retained by the FAA include the authority:

- To regulate land or a facility acquired or modified using federal funding
- To ensure that an airport owner or operator pays not more than fair market value in the context of a commercial transaction for the acquisition of land or facilities on such land
- To exercise any authority contained in 49 U.S.C. § 40117, dealing with Passenger Facility Charges

Section 163(d) of the Act limits the FAA's review and approval authority for ALPs to those portions of ALPs or ALP revisions that:

- Materially impact the safe and efficient operation of aircraft at, to, or from the airport
- Adversely affect the safety of people or property on the ground adjacent to the airport as a result of aircraft operations
- Adversely affect the value of prior Federal investments to a significant extent

ROA is requesting the following federal action associated with the proposed project:

1. Determination under 49 U.S.C. § 47107 relating to the eligibility of the proposed project elements for Federal funding under the Airport Improvement Program (AIP) (this decision does not determine eligibility or availability of potential funds) and/or determinations under 49 USC § 40117, as implemented by 14 CFR 158.25, to impose and use passenger facility charges (PFCs) collected at the airport to assist with construction of potentially eligible development items shown on the ALP
2. Unconditional approval of ROA's updated ALP for the development actions subject to FAA approval authority, pursuant to 49 U.S.C. § 40103(b), and § 47107(a)(16), including the proposed cargo facility, truck dock, and associated apron expansion; and determination on, and approval of, the effects of the Proposed Action upon the safe and efficient utilization of navigable airspace pursuant to 49 U.S.C. § 444718 and 14 CFR Parts 77 and 157

6. Environmental Consequences – Special Impact Categories (refer to the Instructions page and corresponding sections in 1050.1F, the 1050.1F Desk Reference, and the Desk Reference for Airports Actions for more information and direction. Note that when the 1050.1F Desk Reference and Desk Reference for Airports Actions provide conflicting guidance, the 1050.1F Desk Reference takes precedence. The analysis under each section must comply with the requirements and significance thresholds as described in the Desk Reference).

(A) AIR QUALITY

(1) Will the proposed project(s) cause or create a reasonably foreseeable emission increase? Prepare an air quality assessment and disclose the results. Discuss the applicable regulatory criterion and/or thresholds that will be applied to the results, the specific methodologies, data sources and assumptions used; including the supporting documentation and consultation with federal, state, tribal, or local air quality agencies.

NO. The proposed acquisition of the Nordt property would not affect aircraft operations at ROA. Although no tenant is currently identified for future development of the site, it is assumed that the increase in aircraft operations associated with a future cargo facility would fall within the activity levels projected in the most recent ROA aviation activity forecasts (approved by FAA February 6, 2020). These forecasts project a nominal 1.1 percent average compound growth (2,156 operations) in itinerant air carrier/commuter/air taxi operations from base year (2019) to +10 year (2029). Activity tonnage of cargo/mail is anticipated to increase at approximately 3 percent annually. Although it is currently unknown if the project site would be developed as an expansion of the existing cargo facilities (FedEx and UPS) located just to the east or for a new tenant, the facility would not be anticipated to result in more than a minimal increase in total aircraft operations or a change in the size of aircraft operating at ROA. Applying the same 2.1 percent share of total operations (refer to Section 1. Introduction/Background) to the 2029

forecast operations, cargo activity would be anticipated to increase by 150 operations annually (or fewer than 3 operations per week) over the current estimated 1,144 operations, and only a portion of this activity increase would be attributable to a future expansion of cargo facilities at the project site. Thus, emissions are anticipated to remain below established *de minimis* thresholds.

It is important to note that although the COVID-19 pandemic has had a significant impact on aviation worldwide, ROA is already seeing signs of recovery. In June 2021, 46,654 passengers used ROA as compared to a pre-COVID level of 61,827 passengers in December 2019 and a COVID level of 23,384 passengers in December 2020. Based on this rebound in aviation activity at ROA, it is anticipated that the 2020 FAA-approved forecasts of aviation activity remain realistic.

Construction-related air emissions are considered "direct" sources of emissions under the *Clean Air Act* General Conformity Rule and in attainment areas, such as Roanoke City and Roanoke County, can be reported for disclosure purposes under NEPA.³ Sources of construction-related emissions include the exhaust from heavy equipment, delivery trucks, and construction worker vehicles traveling to and from the site; dust from earthwork/grading; equipment movement on unpaved areas; and, fugitive emissions from the storage/transfer of raw materials.⁴

Construction activities at the proposed site would be anticipated to last 15 to 18 months and include construction of a 35,000-square foot air cargo building, 33,250-square foot apron expansion, and a 70,000-square foot truck dock/vehicular parking lot.

As mentioned previously, the proposed project site is located in an area that is in attainment for all National Ambient Air Quality Standards (NAAQS). Given the attainment status, and small area of impact (approximately 3.2 to 6.8 acres), it was deemed appropriate to evaluate potential project-related construction emissions comparatively based on prior modeling results. For this effort, analysis performed with the Airport Construction Emissions Inventory Tool (ACEIT) on a larger similar project (two new buildings, aircraft parking apron, and associated development on a 40-acre site) at another airport was reviewed.⁵ This prior assessment demonstrated that project-related construction emissions would be less than the *de minimis* thresholds for each of the three construction seasons between 2019 and 2021. The highest annual emissions calculated were:

- Ozone (NOx) – 56.8 tons/year (100 tons/year threshold)
- Ozone (VOC) – 44.2 tons/year (50 tons/year threshold)
- Carbon Monoxide, SO₂ and NO₂ – 57.0 tons/year (100 tons/year threshold)
- Particulate Matter (PM10) – 1.8 tons (100 tons/year threshold)

³ FAA, Aviation Emissions and Air Quality Handbook, Version 3, p. 42,
http://www.faa.gov/regulations_policies/policy_guidance/envir_policy/airquality_handbook/media/Air_Quality_Handbook_Appendices.pdf (June 21, 2016).

⁴ *Ibid.*

⁵ AECOM Technical Services, Inc., Short Environmental Assessment Form, Philadelphia International Airport, Consolidated Support Facilities, July 2018.

Based on these results from a comparable larger project,⁶ it is anticipated that no adverse impacts to air quality would occur during construction of the proposed future air cargo facility on the 7.97-acre parcel (Nordt Property) proposed for acquisition at ROA.

(2) Are there any project components containing unusual circumstances, such as emissions sources in close proximity to areas where the public has access or other considerations that may warrant further analysis? If no, proceed to (c); if yes, an analysis of ambient pollutant concentrations may be necessary. Contact your local ADO regarding how to proceed with the analysis.

NO

(3) Is the proposed project(s) located in a nonattainment or maintenance area for the National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act?

NO. According to the *EPA Green Book*, Roanoke City and Roanoke County are in attainment for all criteria pollutants.

4) Are all components of the proposed project, including all connected actions, listed as exempt or presumed to conform (See FRN, vol.72 no. 145, pg. 41565)? If yes, cite exemption and go to (B) Biological Resources. If no, go to (e).

N/A, the proposed site is located within Roanoke City, which is in attainment for all NAAQS.

(5) Would the net emissions from the project result in exceedances of the applicable *de minimis* threshold (reference 1050.1F Desk Reference and the *Aviation Emissions and Air Quality Handbook* for guidance) of the criteria pollutant for which the county is in non-attainment or maintenance? If no, go to (B) Biological Resources. If yes, stop development of this form and prepare a standard Environmental Assessment.

N/A

(B) BIOLOGICAL RESOURCES

Describe the potential of the proposed project to directly or indirectly impact fish, wildlife, and plant communities and/or the displacement of wildlife. Be sure to identify any state or federal species of concern (Candidate, Threatened or Endangered).

1) Are there any candidate, threatened, or endangered species listed in or near the project area?

Pursuant to Section 7 of the *Endangered Species Act* of 1973, as amended, the project area was evaluated for the presence of federally protected species or their suitable habitats. A USFWS Official Species Report was requested for the proposed project site (refer to **Attachment 1**). The USFWS Official Species Report identified no species that may be affected by the Proposed Action.

The US Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) website was reviewed for a list of federally protected species known to occur or potentially occur in Roanoke County (refer to **Attachment 1**). Listed species include:

- Indiana Bat (*Myotis sodalis*), Endangered
- Northern Long-eared Bat (*Myotis septentrionalis*), Threatened
- Roanoke Logperch (*Percina rex*), Endangered

⁶ *Ibid.*

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- Northeastern Bulrush (*Scirpus ancistrochaetus*), Endangered
 - Smooth Coneflower (*Echinacea laevigata*), Endangered

A review of suitable habitat for the species known or potentially occurring in Roanoke County indicates that Roanoke logperch and northeastern bulrush require aquatic or wetland habitats that are not present at the project site. Potentially suitable habitat for the smooth coneflower, a sun-loving plant that depends on periodic fires to reduce shade, is also not present on the project site. Additionally, the closest known northern long-eared bat (NLEB) hibernacula, defined as locations where one or more bats have been detected during hibernation, is located approximately 13 miles northeast of airport property.⁷ Caves and mines frequently used by both the NLEB and Indiana bat for hibernation are not located on the project site. The wooded portion of the project site could provide summer roosting or foraging habitat for the NLEB. However, reproductive female Indiana bats form maternity colonies in wooded areas, typically roosting behind exfoliating bark of large, often dead, trees.⁸ This habitat does not occur on the project site.

The Virginia Fish and Wildlife Information Service (VaFWIS) interactive mapping application was also reviewed to identify any state threatened or endangered species known or likely to occur within a three-mile radius of the proposed project site. The VaFWIS Search Report identified 13 state threatened or endangered species (refer to **Attachment 2**) likely to occur in the vicinity of the project site, including 6 aquatic species, 6 bird/bat species, and 1 insect species. However, no observations of listed species were located within a 1½-mile radius of the project site, nor were predicted aquatic or terrestrial habitats for listed species identified.

(2) Will the action have any long-term or permanent loss of unlisted plants or wildlife species?

NO. The proposed 7.97-acre site is surrounded by existing airport and commercial development and based on review of the IPaC and VaFWIS database searches, no significant impacts to plants or wildlife are anticipated.

(3) Will the action adversely impact any species of concern or their habitat?

NO. Future development of a cargo facility would require tree clearing; however, based on review of the IPaC and VaFWIS database searches, no significant impacts to species of concern, including bats, are anticipated.

(4) Will the action result in substantial loss, reduction, degradation, disturbance, or fragmentation of native species habitats or populations?

NO. The proposed 7.97-acre site is surrounded by existing airport and commercial development.

(5) Will the action have adverse impacts on a species' reproduction rates or mortality rate or ability to sustain population levels?

NO

⁷ Virginia DWR, Northern Long-Eared Bat Winter Habitat & Roost Trees Application (February 11, 2021).

⁸ USFWS, Indiana Bat (*Myotis sodalis*) Draft Recovery Plan: Frist Version, April 2007, p. 7 (July 23, 2021)

(6) Are there any habitats, classified as critical by the federal or state agency with jurisdiction, impacted by the proposed project?

NO

(7) Would the proposed project affect species protected under the Migratory Bird Act? (If **Yes**, contact the local ADO).

NO. Although the IPaC report (refer to **Attachment 1**) lists several migratory birds that may occur in Roanoke County, the 7.97-acre site is surrounded by the existing airfield, airport development, and commercial development, minimizing the likelihood of migratory birds on-site. Furthermore, no bald or golden eagle nests are located on the site. The Migratory Bird Treaty Act prohibits the intentional taking, selling, or otherwise harming of migratory birds, their eggs, or nests. No impacts to birds protected by the Migratory Bird Treaty Act are anticipated to result from the Proposed Action and none would be intentional.

If the answer to any of the above is “Yes”, consult with the USWFS and appropriate state agencies and provide all correspondence and documentation.

(C) CLIMATE

(1) Would the proposed project or alternative(s) result in the increase or decrease of emissions of Greenhouse gases (GHG)? If neither, this should be briefly explained and no further analysis is required and proceed to (D) Coastal Resources.

YES, increase. The proposed property acquisition would not affect aircraft operations at ROA. Although no tenant is currently identified for future development of the site, it is assumed that any increase in aircraft operations associated with development of a future cargo facility would fall within the ROA activity levels projected in the most recent aviation activity forecasts (approved February 6, 2020). These forecasts project a nominal 1.1 percent average compound growth rate in itinerant air carrier/commuter/air taxi operations from base year (2019) to +10 year (2029). Activity tonnage of cargo/mail is anticipated to increase at approximately 3 percent annually. Although it is currently unknown if the project site would be developed as an expansion of the existing cargo facilities located just to the east or for a new tenant, the future facility would not be anticipated to result in more than a minimal increase in total aircraft operations or a change in the size of aircraft operating at ROA. Applying the same 2.1 percent share of total operations (refer to Section 1. Introduction/Background) to the 2029 forecast operations, cargo activity would be anticipated to increase by 150 operations annually (or fewer than 3 operations per week) over the current estimated 1,144 operations, and only a portion of this activity increase would be attributable to a future expansion of cargo facilities at the project site. Additionally, a future air cargo facility would not be anticipated to generate an appreciable increase in vehicle trips over the approximately 125 vehicle trips per day that are associated with the existing use of the site.⁹ Thus, no measurable change in GHG emissions would be anticipated.

(2) Will the proposed project or alternative(s) result in a net decrease in GHG emissions (as indicated by quantitative data or proxy measures such as reduction in fuel burn, delay, or flight operations)? A brief statement describing the factual basis for this conclusion is sufficient.

N/A

⁹ Based on review of Google earth historic aerial photography, vehicles present at the proposed site range from 51 to 67 between 2015 and 2019.

(3) Will the proposed project or alternative(s) result in an increase in GHG emissions? Emissions should be assessed either qualitatively or quantitatively as described in 1050.1F Desk Reference or Aviation Emissions and Air Quality Handbook.

YES. As previously discussed (Air Quality, page 12), the project will result in construction and operation increases in GHG, but the increases will be below established *de minimis* thresholds and the construction emissions will be temporary.

(D) COASTAL RESOURCES

(1) Would the proposed project occur in a coastal zone, or affect the use of a coastal resource, as defined by your state's Coastal Zone Management Plan (CZMP)?

NO

(2) If **Yes**, is the project consistent with the State's CZMP? (If applicable, attach the sponsor's consistency certification and the state's concurrence of that certification).

N/A

(3) Is the location of the proposed project within the Coastal Barrier Resources System? **NO** (If **Yes**, and the project would receive federal funding, coordinate with the FWS and attach record of consultation).

N/A

(E) SECTION 4(f) RESOURCES

(1) Does the proposed project have an impact on any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or an historic site of national, state, or local significance? Specify if the use will be physical (an actual taking of the property) or constructive (i.e. activities, features, or attributes of the Section 4 (f) property are substantially impaired.) If the answer is "No," proceed to (F) Farmlands.

NO. No public park, recreation area, wildlife or waterfowl refuge or historic site is located in the vicinity of the Proposed Action. In an email dated January 15, 2021, the Virginia Department of Historic Resources (DHR) concurred that no architectural properties eligible for or listed in the National Register of Historic Places would be impacted by the Proposed Action (refer to **Attachment 4**).

(2) Is a *De Minimis* impact determination recommended? If "yes", please provide; supporting documentation that this impact will not substantially impair or adversely affect the activities, features, or attributes of the Section 4 (f) property; a Section 106 finding of "no adverse effect" if historic properties are involved; any mitigation measures; a letter from the official with jurisdiction concurring with the recommended *de minimis* finding; and proof of public involvement. (See Section 5.3.3 of 1 a50.1F Desk Reference). If "No," stop development of this form and prepare a standard Environmental Assessment.

N/A

(F) FARMLANDS

Does the project involve acquisition of farmland, or use of farmland, that would be converted to non-agricultural use and is protected by the Federal Farmland Protection Policy Act (FPPA)? (If **Yes**, attach record of coordination with the Natural Resources Conservation Service (NRCS), including form AD-1006.)

NO. The FPPA does not apply to land already committed to "urban development or water storage" (i.e., airport developed areas) regardless of its importance as defined by NRCS. As ROA is within an Urbanized Area as depicted on the 2010 Census Urbanized Reference Map (see **Figure 4**), it is not subject to FPPA.

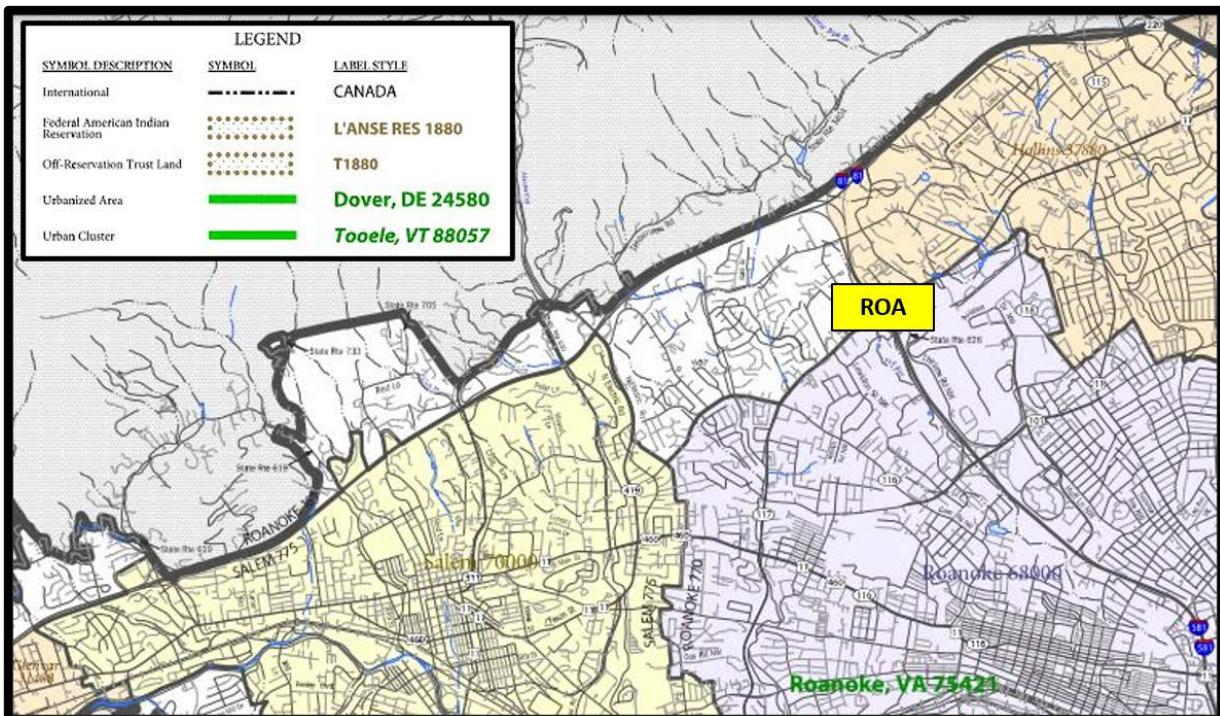


Figure 4, U.S. Census Urbanized Area Reference Map: Roanoke VA

(G) HAZARDOUS MATERIALS, SOLID WASTE, AND POLLUTION PREVENTION

(1) Would the proposed project involve the use of land that may contain hazardous materials or cause potential contamination from hazardous materials? (If Yes, attach record of consultation with appropriate agencies).

YES. A Phase I Environmental Site Assessment (ESA) was prepared for the site in July 2021 and is included in **Attachment 3**. Although the project site/owner, John C. Nordt Company Inc, was identified in multiple databases, the listings are associated with various registrations and permits for the site and not unresolved violations or releases. Listings include:

- Energy Recovery/Incineration Facility
- Underground Storage Tanks (USTs)
 - One 4,000-gallon diesel fuel UST (installed 1984)
 - Two 10,000-gallon USTs (aviation gas and gasoline fuel, installed in 1984, removed in 1998)
- Resource Conservation and Recovery Act (RCRA) small quantity hazardous waste generator (220 pounds or less of hazardous waste generated per month and 2,200 pounds or less of hazardous waste accumulated at any time)
- Minor Air Permit

Also, during the site reconnaissance an ammonia above ground storage tank (AST) was identified in addition to vent pipes for the three USTs mentioned above. No evidence of a release or overfilling was observed.

Based on the results of the July 2021 ESA (**Attachment 3**), two Recognized Environmental Conditions (RECs) were identified:

- a jewelry facility has been in operation on the subject property since the 1980's, which has included the use of chemicals and heavy metals
- the above mentioned 4,000-gallon diesel UST was reportedly installed in 1984, updated in 1998 with new lines and equipment, and improved again recently with a new tank gauge and leak detection system; this UST in compliance with current regulations

No RECs were identified on adjoining properties.

The 2021 Phase I ESA recommends the following actions:

1. Complete limited subsurface sampling at a minimum of six locations downgradient from the on-site UST, as well as a vapor intrusion assessment in the interior and exterior of the building
2. Complete surveys for asbestos and lead based paint in on-site structures
3. Remove the ammonia AST, UST, incinerator/furnace, and other specialized equipment prior to change of use or demolition/construction.

The Airport is currently undertaking the recommended Phase 2 ESA limited subsurface sampling to further investigate potential hazardous waste contamination on site as part of their ongoing due diligence review of the Proposed Action, with the results being incorporated into the Final EA. Although there are currently no specific plans for the demolition or reuse of the existing office buildings on the property to be acquired, the draft ALP does indicate removal of these structures for cargo apron expansion (refer to **Figure 2**). It is important to note that although the development plans are uncertain, the contractor selected to construct the future cargo facility would be responsible for demolition of the existing structures and proper removal of any potentially hazardous materials, including any potential asbestos or lead based paint, in accordance with all local, state, and federal guidelines. Additionally, the AST, UST, incinerator/furnace, and other specialized equipment would be removed from the site prior to demolition or construction activities and properly disposed. Although there are currently no plans for ground disturbance, if encountered during future development of the site, contaminated soils or hazardous materials would be removed and remediated in accordance with local, state, and federal guidelines.

(2) Would the operation and/or construction of the project generate significant amounts of solid waste? If **Yes**, are local disposal facilities capable of handling the additional volumes of waste resulting from the project? 1

NO. Construction or daily operation of the proposed future development would not be anticipated to produce a significant amount of solid waste. Although there are currently no specific plans for the demolition or reuse of the existing office buildings on the site, the draft ALP does indicate removal of these structures for cargo apron expansion. As discussed previously, the contractor selected to construct the future cargo facility would be responsible for demolition of

the existing structures and proper removal of any potentially hazardous materials in accordance with all local, state, and federal guidelines. Any merchantable trees, including pulpwood or saw timber, would be salvaged prior to the beginning of construction, and slash would be chipped/shredded and removed rather than being burned on-site. Solid waste generated during the project could be disposed of at the Roanoke County Landfill, located 5 miles southeast of the Airport.

- (3) Will the project produce an appreciable different quantity or type of hazardous waste? Will there be any potential impacts that could adversely affect human health or the environment?

NO

(H) HISTORIC, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES

- (1) Describe any impact the proposed project might have on any properties listed in, or eligible for inclusion in the National Register of Historic Places. (Include a record of your consultation and response with the State or Tribal Historic Preservation Officer (S/THPO)).

Based on a review of the Virginia Cultural Resources Information System, there are no known archaeological sites, cemeteries, or historic structures or districts located on or adjacent to the project site. Historical aerial imagery shows that the structures present on the proposed site were built between 1982 and 1995, along with the structures on adjacent parcels. Aside from airport buildings, the only other structures within the viewshed of the proposed project are commercial businesses located south of Coulter Drive NW and New Life Christian Ministries located east of Airport Road NW.

In accordance with Section 106 of the *National Historic Preservation Act* (NHPA), project information was submitted to the Virginia Department of Historic Resources to initiate the Determination of Effect Coordination. In their email dated January 15, 2021, the VA DHR concurred that no architectural properties eligible for or listed on the National Register of Historic Places would be impacted by the Proposed Action (refer to **Attachment 4**). No further consultation is necessary; however, the VA DHR should be contacted if the project changes.

- (2) Describe any impacts to archeological resources as a result of the proposed project. (Include a record of consultation with persons or organizations with relevant expertise, including the S/THPO, if applicable).

The proposed site is partially wooded and has been previously impacted during construction of two on-site buildings and parking areas. In accordance with Section 106 of the NHPA, project information was submitted to the VA DHR to initiate the Determination of Effect Coordination. In their email dated January 15, 2021, the VA DHR concurred that no previously documented archaeological resources are located within the project area and, due to prior disturbance, it is unlikely that any intact deposits would be encountered during future development (refer to **Attachment 4**). No further consultation is necessary; however, the VA DHR should be contacted if the project changes or cultural materials are encountered during construction.

(I) LAND USE

(1) Would the proposed project result in other (besides noise) impacts that have land use ramifications, such as disruption of communities, relocation of residences or businesses, or impact natural resource areas?

YES. The proposed property acquisition is located on a partially developed/partially wooded site surrounded by existing Airport property. Development of this site would not result in disruption of communities, relocation of residences, or impacts to natural resource areas. The proposed site to be acquired is currently leased. The business relocation and 7.97 acres of property acquisition would be completed in accordance with the *Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970*, as amended (Uniform Act). Those being relocated would receive the full benefits entitled under the Uniform Act, including fair market value compensation for the acquired property and equitable compensation normally associated with relocating. In accordance with Title VI of the Civil Rights Act of 1966, the FAA shall provide relocation advisory assistance to all eligible persons without discrimination. Review of the Roanoke Economic Development and City of Roanoke Owned Available Property websites indicates that sufficient buildings are available for lease or new development in close proximity to ROA. One such site is located approximately 1.45 miles to the west of Runway 6-24 and I-581 in the Frontage area of the master-planned Countryside development.

A 1979 plat of the Nordt property to be acquired identifies the northeast corner as being set aside for use as a retention pond. Based on coordination with City of Roanoke Planning, Building & Development staff, the 1979 restrictive covenant regarding a retention pond is unnecessary if the stormwater management requirements of State Code section 9VAC25-870-66 Water Quantity are met by the proposed development (refer to **Attachment 5**). There are no known restrictions on development of the site.

Furthermore, the Proposed Acquisition is consistent with the City of Roanoke's draft Comprehensive Plan, which includes "Support of the Roanoke-Blacksburg Regional Airport master plan as an action item for Policy 4: Ensure solid infrastructure is available to support commerce."¹⁰

(2) Would the proposed project be located near or create a wildlife hazard as defined in FAA Advisory Circular 150/5200-33, "Wildlife Hazards On and Near Airports"?

NO. No aspects of the proposed property acquisition or future development would result in creation of a potential wildlife hazard near Roanoke-Blacksburg Regional Airport. As mentioned previously, the closest disposal facility is located 5 mile southeast of the Airport and thus, complies with the guidelines established in FAA AC 150/5200-33.

(3) Include documentation to support sponsor's assurance under 49 U.S.C. § 47107 (a) (10), of the 1982 Airport Act, that appropriate actions will be taken, to the extent reasonable, to restrict land use to purposes compatible with normal airport operations.

¹⁰ *City Plan 2040*, Roanoke City 20 Year Comprehensive Plan, Planning Commission Draft, p. 95, <https://planroanoke.org/city-plan-2040/> (June 21, 2021).

Refer to sponsor's assurance included as **Attachment 6**. The Proposed Action is located adjacent to existing airport development, is zoned as Airport Development, and is compatible with airport activity.

(J) NATURAL RESOURCES AND ENERGY SUPPLY

What effect would the project have on natural resource and energy consumption? (Attach record of consultations with local public utilities or suppliers if appropriate)

Utility providers for ROA and the adjacent commercial development include:

- Electric by AEP Appalachian Power;
- Gas by Roanoke Gas Company; and,
- Water by Western Virginia Water Authority;

Consumption of natural resources and use of energy supplies is anticipated to be most noticeable during construction, with the clearing of approximately two acres of trees for site development and trips to/from the site by construction equipment and workers. Construction trips are anticipated to include 75 to 100 tractor trailer truck deliveries and 1,000 truck trips delivering construction materials, in addition to an average of 25 construction workers at the site daily. Spread out over the 15 to 18-month construction period, these trips would be anticipated to conservatively result in fewer than two tractor trailer deliveries to the site per week, approximately three trucks with construction materials per day, and approximately 50 daily vehicle trips by construction workers to/from the site [or less than half of the daily vehicle trips associated with the current use of the site, refer to Section 6(C)].

After completion of the future air cargo facility, natural resources and energy would be required for operation of the facility. Applying the same 2.1 percent share of total operations (refer to Section 1. Introduction/Background) to the 2029 forecast operations, cargo activity would be anticipated to increase by 150 operations annually (or fewer than 3 operations per week) over the current estimated 1,144 operations, and only a portion of this activity increase would be attributable to a future expansion of cargo facilities at the project site.

Based on these projections, the Proposed Action would not be anticipated to exceed available or future energy supplies or consume significant natural resources during construction or operation of future cargo facilities at the site.

(K) NOISE AND NOISE-COMPATIBLE LAND USE

Will the project increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65 dB level due to a DNL 1.5 dB or greater increase, when compared to the no action alternative for the same timeframe? (Use AEM as a screening tool and AEDT 2b as appropriate. See FAA Order 1050.1F Desk Reference, Chapter 11, or FAA Order 1050.1F, Appendix B, for further guidance). Please provide all information used to reach your conclusion. If yes, contact your local ADO.

NO. The Proposed Action is not anticipated to result in use of the Airport by larger aircraft. UPS currently operates the Boeing 757-200, which is also designated as the critical aircraft at ROA. As described previously, it is assumed that any increase in aircraft operations associated with future development of the site as an air cargo facility would be accounted for within the activity levels projected in the most recent ROA aviation activity forecasts (February 6, 2020). These forecasts project a nominal 1.1 percent average compound growth rate in itinerant air carrier/commuter/air

taxi operations from base year (2019) to +10 year (2029). As described previously, applying the same 2.1 percent of total operations to the 2029 forecast operations, cargo activity would be anticipated to increase by only 150 total operations annually (or fewer than 3 operations per week) over the current estimated 1,144 annual operations and only a portion of this activity increase would be attributable to a future expansion of cargo facilities at the project site.

Review of the 20-year noise contours (2029) for ROA indicates that the 65 dBA noise contour is almost entirely located on existing airport property (refer to **Figure 5**). Land use in the off-airport areas is identified as Airport Development or Vacant. No Residential areas would be impacted. It is anticipated that some of the approximately 150 additional annual cargo operations forecast for 2029 would be attributable to future development of an air cargo facility at the proposed site. At approximately 2 percent of the total annual operations at ROA, 150 additional operations would have a minimal impact on ROA's noise contours.

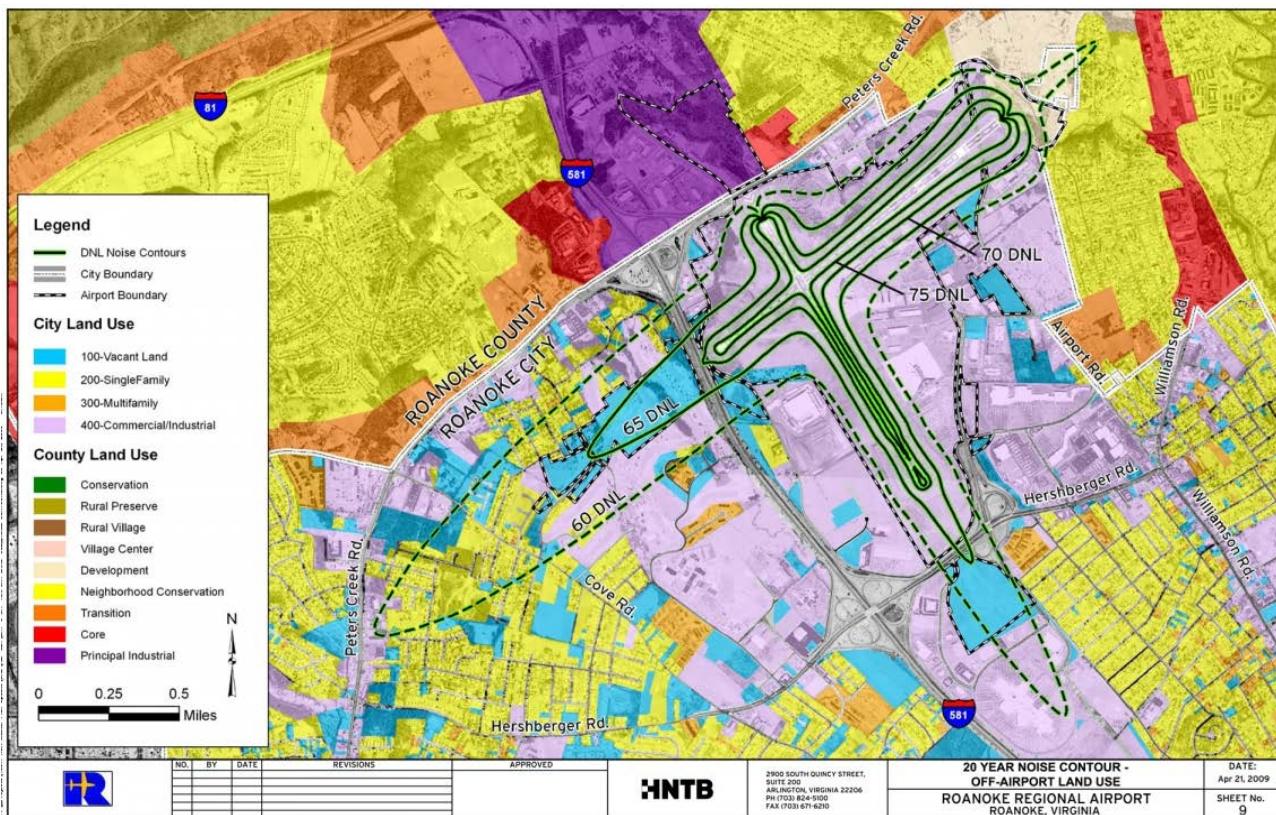


Figure 5: 20-year Noise Contour (2029) – Off-Airport Land Use

Noise impacts may result from the future construction of an air cargo building, apron expansion, and truck dock/vehicular parking lot; however, these impacts would be temporary in nature and their degree of impact would subside as construction concludes. Construction of the proposed cargo development is anticipated to take 15 to 18 months.

Noise impacts during construction are primarily associated with an increase in ambient noise levels from the construction equipment. Typical noise levels generated by different types of construction equipment are presented in **Table 1**.

Table 1
Noise Level (dBA) for Construction Equipment

EQUIPMENT	dBA Leq @ 50 feet
Front Loader	79
Back Hoe	85
Dozer	80
Tractor	80
Grader	85
Truck	91
Paver	89
Concrete Mixer	85
Crane	83
Pump	76
Generator	78
Compressor	81
Pile Driver	100
Jackhammer	88
Rock Drill	98
Saw	78

SOURCE: Grant, Charles A. and Reagan, Jerry, A., *Highway Construction Noise: Measurement, Prediction and Mitigation*.

Above 65 dBA, noise sensitive land uses, such as residential, are typically discouraged. The project site is located within a business and industrial area immediately adjacent to the airport. The closest residence is located approximately 0.35 mile (1,850 feet) east. Distance would rapidly attenuate noise, and it is not anticipated that construction would occur close enough to existing residential areas or sensitive receptors to cause disturbances.

(L) SOCIOECONOMICS, ENVIRONMENTAL JUSTICE, and CHILDREN'S HEALTH and SAFETY RISKS

(1) Would the project cause an alteration in surface traffic patterns, or cause a noticeable increase in surface traffic congestion or decrease in Level of Service?

YES. Additional vehicle trips would be anticipated to result from future construction of a cargo facility at the proposed site. However, surface traffic related to the proposed future cargo development would be replacing existing vehicular use of the site, or approximately 125 vehicle trips per day.¹¹ Future vehicular use of the site would be anticipated to be similar to existing traffic patterns and congestion at ROA.

The proposed site provides convenient vehicular access to I-581 via Airport Road NW (SR 118) and Peters Creek Road (SR 117) that is currently used by trucks traveling to and from the adjacent UPS and FedEx cargo facilities. As depicted in **Figure 4**, Airport Road NW has an AADT that ranges from 12,000 vehicles near Peters Creek Road to the north, to 6,200 vehicles near Williamson Road to the south. Airport Road NW is a principal arterial with a left turn lane and a

¹¹ Based on review of Google earth historic aerial photography, vehicles present at the proposed site range from 51 to 67 between 2015 and 2019.

traffic signal to the north at the Airport Road/Peters Creek Road intersection and a right yield lane and traffic signal at the Airport Road NW/Williamson Road intersection to the south. Maneuverability, delays, and travel speed can affect Level of Service (LOS) for an arterial. Expansion of the adjacent cargo facilities or addition of a new cargo tenant would not be anticipated to impact the LOS of Airport Road NW, since the future cargo development would be replacing approximately 125 existing vehicle trips at the site and due to travel on the nearby roadway network being facilitated by existing turn lanes and traffic signals.

Additional vehicle trips would be anticipated during the future 15 to 18-month construction period, as construction workers travel to and from the site. Construction trips are anticipated to include 75 to 100 tractor trailer truck deliveries and 1,000 truck trips delivering construction materials, in addition to an average of 25 construction workers at the site daily. Spread out over the 15 to 18-month construction period, these trips would be anticipated to conservatively result in fewer than two tractor trailer deliveries to the site per week, approximately three trucks with construction materials per day, and approximately 50 daily vehicle trips by construction workers to/from the site [or less than half of the daily vehicle trips associated with the current use of the site, refer to Section 6(C)]. These impacts would be temporary in nature (15 to 18 months), ending when construction concludes, and would not be anticipated to result in significant traffic congestion in the vicinity of the airport.

- (2) Would the project cause induced, or secondary, socioeconomic impacts to surrounding communities, such as changes to business and economic activity in a community; impact public service demands; induce shifts in population movement and growth, etc.?

NO. Although development of a future air cargo facility would have a positive economic impact on ROA and the community, no significant induced or secondary impacts would be anticipated. The proposed parcel acquisition and future air cargo facility would be surrounded by existing Airport development and commercial businesses and would not impact public service demands or induce shifts in population growth.

The proposed site is currently leased by a jewelry manufacturer. This existing business would be relocated because of the Proposed Action. The business relocation and 7.97 acres of property acquisition would be completed in accordance with the *Uniform Relocation and Assistance and Real Property Acquisition Policies Act of 1970*, as amended (Uniform Act). Those being relocated would receive the full benefits entitled under the Uniform Act, including fair market value compensation for the acquired property and equitable compensation normally associated with relocating. Additionally, review of the Roanoke Economic Development and City of Roanoke Owned Available Property websites indicates that sufficient buildings are available for lease or new development near ROA. One such site is located approximately 1.45 miles to the west of Runway 6-24 and I-581 in the Frontage area of the master-planned Countryside development. No significant negative economic impacts are anticipated.

(3) Would the project have a disproportionate impact on minority and/or low-income communities? Consider human health, social, economic, and environmental issues in your evaluation. Refer to DOT Order 5610.2(a) which provides the definition for the types of adverse impacts that should be considered when assessing impacts to environmental justice populations.

NO. The proposed site is surrounded by Airport development and existing commercial businesses and would not result in any residential relocations or other impacts (refer to Section "K", Noise and Noise-Compatible Land Use).

Regarding environmental justice populations, demographic and income data was reviewed using the USEPA's EJScreen tool (refer to **Attachment 7**) within a 1/2-mile radius of the site, which encompasses the eastern portion of the Airport and nearby residential development. EJScreen data for the project site was compared with Virginia and the U.S. Census Bureau's data for Roanoke City. As shown in **Table 2**, the percentage of minority populations in the vicinity of the proposed site are lower than both Roanoke City and Virginia, while the percentage of low income populations in the vicinity of the proposed site are higher than both Roanoke City and Virginia. No disproportionate impacts to environmental justice populations are anticipated to result from the Proposed Action, as impacts would be limited to areas immediately adjacent to the site and airport property. The closest residence is located approximately 0.3 mile east of the site, off of Anchor Drive.

Table 2 SOCIOECONOMIC DATA			
Statistic	Project Vicinity (within 1/2 mile radius)*	Roanoke City⁺	Virginia*
Minority Population (%)	27	39	38
Low Income (%)	35	20.6	26
Sources: *EJScreen 2014 – 2018 American Community Survey (https://ejscreen.epa.gov/mapper/ejscreen_SOE.aspx) +U.S. Census Bureau (accessed via Census Data Explorer website: https://data.census.gov/cedsci/)			

(4) Would the project have the potential to lead to a disproportionate health or safety risk to children?

NO

If the answer is "YES" to any of the above, please explain the nature and degree of the impact. Also provide a description of mitigation measures which would be considered to reduce any adverse impacts.

N/A

(M) VISUAL EFFECTS INCLUDING LIGHT EMISSIONS

(1) Would the project have the potential to create annoyance or interfere with normal activities from light emissions for nearby residents?

NO. Light emissions associated with the proposed future development would not create an annoyance for adjacent properties. In addition, the proposed site is located approximately 0.3 mile (1,850 feet) from the closest residence and would be buffered by a stand of trees.

(2) Would the project have the potential to affect the visual character of nearby areas due to light emissions?

NO. The proposed parcel acquisition and future development would be similar to the existing development on adjacent properties.

(3) Would the project have the potential to block or obstruct views of visual resources?

NO

If the answer is “YES” to any of the above, please explain the nature and degree of the impact using graphic materials. Also provide a description of mitigation measures which would be considered to reduce any adverse impacts.

(N) WATER RESOURCES (INCLUDING WETLANDS, FLOODPLAINS, SURFACE WATERS, GROUNDWATER, AND WILD AND SCENIC RIVERS)

(1) WETLANDS

(a) Does the proposed project involve federal or state regulated wetlands or non-jurisdictional wetlands? (Contact USFWS or appropriate state natural resource agencies if protected resources are affected) (Wetlands must be delineated using methods in the US Army Corps of Engineers 1987 Wetland Delineation Manual. Delineations must be performed by a person certified in wetlands delineation. Document coordination with the resource agencies).

NO. A wetland investigation was conducted at the project site on October 28, 2021, by a qualified biologist. No jurisdictional wetlands, or other waters of the U.S. (i.e., streams, ponds, etc.) are present on the site (refer to **Attachment 8**). As described previously, the site consists primarily of maintained turf grass and two commercial buildings with associated impervious parking areas located in the central and southern portions of the site. The northern portion of the site is a forested stand dominated by American elm, black walnuts, and maple trees.

(b) If yes, does the project qualify for an Army Corps of Engineers General permit? (Document coordination with the Corps).

N/A

(c) If there are wetlands impacts, are there feasible mitigation alternatives? Explain.

N/A

(d) If there are wetlands impacts, describe the measures to be taken to comply with Executive Order 11990, Protection of Wetlands.

N/A

(2) FLOODPLAINS

(a) Would the proposed project be located in, or would it encroach upon, any 100-year floodplains, as designated by the Federal Emergency Management Agency (FEMA)?

NO (refer to **Attachment 9**)

(b) If Yes, would the project cause notable adverse impacts on natural and beneficial floodplain values as defined in Paragraph 4.k of DOT Order 5620.2, *Floodplain Management and Protection*?

N/A

(c) If Yes, attach the corresponding FEMA Flood Insurance Rate Map (FIRM) and describe the measures to be taken to comply with Executive Order 11988, including the public notice requirements.

N/A

(3) SURFACE WATERS

(a) Would the project impact surface waters such that water quality standards set by Federal, state, local, or tribal regulatory agencies would be exceeded or would the project have the potential to contaminate a public drinking water supply such that public health may be adversely affected?

NO. There are no surface waters located on or near the proposed site. The closest body of water is Deer Branch Creek, which is located approximately 1 mile east of the project site.

(b) Would the water quality impacts associated with the project cause concerns for applicable permitting agencies or require mitigation in order to obtain a permit?

NO. The proposed project would be constructed in accordance with ROA's existing stormwater pollution prevention plan (SWPPP) and National Pollutant Discharge Elimination Systems (NPDES) permit, which will continue to protect water quality in the vicinity of the airport. During construction, sediment transport and potential impacts to off-site surface waters would be minimized by implementing Best Management Practices (BMPs), such as silt fencing and the use of check dams in ditches to catch sediment. In addition, efforts would be made to schedule construction operations to minimize the exposure of excavated areas and re-vegetate these areas as soon as possible after grading.

If the answer to any of the above questions is "Yes", consult with the USEPA or other appropriate Federal and/or state regulatory and permitting agencies and provide all agency correspondence.

N/A

(4) GROUNDWATER

(a) Would the project impact groundwater such that water quality standards set by Federal, state, local, or tribal regulatory agencies would be exceeded or would the project have the potential to contaminate an aquifer used for public water supply such that public health may be adversely affected?

NO

(b) Would the groundwater impacts associated with the project cause concerns for applicable permitting agencies or require mitigation in order to obtain a permit?

N/A

(c) Is the project to be located over an EPA-designated Sole Source Aquifer?

NO

If the answer to any of the above questions is "Yes", consult with the USEPA or other appropriate Federal and/or state regulatory and permitting agencies and provide all agency correspondence as an attachment to this form.

N/A

(5) WILD AND SCENIC RIVERS

Would the proposed project affect a river segment that is listed in the Wild and Scenic River System or Nationwide River Inventory (NRI)? (If Yes, coordinate with the jurisdictional agency and attach record of consultation).

NO. There are no surface waters located on or near the proposed site. The closest surface water is Deer Branch Creek, which is located approximately 1 mile east of the project site. Deer Branch Creek and Carvin Creek join and meet Tinker Creek approximately 2.25 miles southeast of the proposed site. None of these surface waters are classified as a Wild and Scenic River or included in the National River Inventory.

(O) CUMULATIVE IMPACTS

Discuss impacts from past, present, and reasonably foreseeable future projects both on and off the airport. Would the proposed project produce a cumulative effect on any of the environmental impact categories above? Consider projects that are connected and may have common timing and/or location. For purposes of this Form, generally use 3 years for past projects and 5 years for future foreseeable projects.

NO. The proposed Nordt Property parcel acquisition and future air cargo development is unlikely to contribute to any significant adverse cumulative impacts.

The cumulative impact analysis under NEPA requires the evaluation of a Proposed Action's direct and indirect impacts on a particular resource to determine if those effects in combination with the effects of other projects on the same resource would be cumulatively significant. Accordingly, the resources of concern relative to the proposed parcel acquisition and future development include potential water quality impacts associated with construction of additional impervious surfaces and increased stormwater runoff, as well as temporary impacts during construction.

Recent residential, commercial, and industrial development in the vicinity of the Airport has been limited. Population growth in Roanoke County has been slow, increasing 2.96 percent from 2010 to 2019, and this trend is expected to increase over the next 10 years.¹²

Development pressure in the vicinity of the proposed project would not be anticipated to be high. Recent development in the vicinity of the Airport includes two large apartment buildings constructed on Carefree Lane in approximately 2019. Additional recent residential development in this area includes multiple condominiums on the adjacent Village Green Drive. These developments are located approximately 0.75 mile northeast of the Proposed Action, on the opposite side of Deer Branch Creek. The Virginia Department of Transportation website was also reviewed, however, no roadway improvement projects in the vicinity of ROA were identified. Two additional lanes are under construction on I-81 between Exits 141 and 143, however, this work is approximately two miles northwest of ROA.

Development projects at the Roanoke-Blacksburg Regional Airport within the past three years have consisted primarily of runway and taxiway rehabilitations, which did not result in the addition of new impervious surfaces at ROA.

¹² City of Roanoke, Municipal Auditing Department, "Annual Simplified Comparative Report: 2019," <https://www.roanokeva.gov/DocumentCenter/View/15070/2019-Annual-Simplified-Comparative-Report>.

The current Seven-Year Capital Improvement Program at ROA includes over 50 proposed projects. From that list, **Table 3** includes the proposed improvements involving ROA pavements or airfield construction, as these projects could add impervious surfaces or change aircraft operations at ROA.

Table 3
ROA CAPITAL IMPROVEMENT PROGRAM
Pavement and Impervious Surface Projects

CAPITAL PROJECTS	PLANNED CONSTRUCTION				
	FY 2021	FY 2022	FY 2023	FY2024	FY2025
Replace RW 34 EMAS			X		
Improve RW 6-24 Safety Areas (Modified EMAS)			X	X	X
Rehab Taxiway A					X
Rehab Taxiway G, G1 & N Hold Apron	X				
Rehab Runway 6-24					X
Runway 24 Tunnel Rehab			X		X
Rehabilitate Cargo Road			X		
Rehabilitate Building 31 & ARFF Pavement			X		
Rehabilitate GA Loop Road			X		
Terminal Public Parking	X	X			
New Hangar Development	X				
Rehabilitate FBO Parking Lot & Access Road	X				
Reconstruct Building 5 Pavement			X		

Potential cumulative impacts to resources of concern identified in review of the Proposed Action are evaluated in the following sections in terms of the previously discussed past, present, and reasonably foreseeable future projects at ROA or nearby.

Water Quality

Cumulatively, no significant water quality impacts are anticipated as the project will be constructed in accordance with ROA's existing stormwater pollution prevention plan (SWPPP) and National Pollutant Discharge Elimination Systems (NPDES) permit. Sediment and erosion control measures and BMPs would be implemented for current and future construction projects, which would help ensure that water quality conditions in nearby Deer Branch Creek and associated tributaries are not impacted.

Noise

None of these past, present, and reasonably foreseeable future projects at ROA or in the vicinity, increase airport capacity or result in additional aircraft operations. Therefore, these projects would have no impact on ROA's noise environment when considered cumulatively with the minimal potential increase in total aircraft operations associated with the Proposed Action and future development of an air cargo facility (refer to Section "K", Noise and Noise-Compatible land Use). Due to the existing commercial, industrial/manufacturing, and airport land uses in the area, construction noise impacts would not be anticipated to result in significant impacts.

Air Quality

As discussed above, none of the past, present, and reasonably foreseeable future projects would increase airport capacity or result in additional aircraft operations. Therefore, when considered cumulatively with the Proposed Action and future development of an air cargo facility (refer to Section "A", Air Quality), emissions associated with these past, present, and reasonably foreseeable future projects would be anticipated to remain below established *de minimis* thresholds.

7. PERMITS

List all required permits for the proposed project. Has coordination with the appropriate agency commenced? What feedback has the appropriate agency offered in reference to the proposed project? What is the expected time frame for permit review and decision?

Permits and approvals for the Proposed Action include:

Table 4 Approvals Obtained during Environmental Assessment			
REVIEW	APPROVAL REQUESTED	AGENCY	COMMENTS
Restrictive Covenant on Parcel	Approval	City of Roanoke Planning, Building & Development Department	Meeting stormwater requirements in State Code section 9VAC25-870-66 supersedes covenant on 1979 plat
Section 106 of National Historic Preservation Act	Concurrence	VA Department of Historic Resources, Office of Review and Compliance	Finding of No Historic Properties Affected issued

Table 5 Permits/Approvals Anticipated after Environmental Assessment			
REVIEW	APPROVAL REQUIRED	AGENCY	PROJECT PHASE ANTICIPATED
NPDES Permit for Construction Activities (includes SWPPP and SWM Plan)	Permit	VA Department of Environmental Quality	Design
Erosion and Sediment Control Plans	Approval	City of Roanoke	Design
Land Disturbance Permit	Permit	City of Roanoke	Construction

8. MITIGATION

Describe those mitigation measures to be taken to avoid creation of significant impacts to a particular resource as a result of the proposed project, and include a discussion of any impacts that cannot be mitigated.

N/A. No significant impacts have been identified; thus, no mitigation is proposed. BMPs would be implemented as appropriate during construction to prevent impacts to water quality and an increase in stormwater quantity.

9. PUBLIC INVOLVEMENT

Describe the public review process and any comments received. Include copies of Public Notices and proof of publication.

The draft Short Form EA will be made available to the public for a 30-day review period online at <https://www.flyroa.com/airport-info> and at Hollins Library, 6624 Peters Creek Road, Roanoke. Notice of the availability of the Draft EA will also be advertised in the *Roanoke Times* (refer to **Attachment 10**).

10. LIST OF ATTACHMENTS

Attachment

- 1 – USFWS IPaC**
- 2 – VaFWIS Search Report**
- 3 – Phase I ESA and Recommendations**
- 4 – VA DHR Coordination**
- 5 – Restrictive Covenant Coordination**
- 6 – Sponsor's Assurance**
- 7 – NEPAssist Environmental Justice Screen**
- 8 – Waters of the U.S. Investigation Report**
- 9 – FEMA Floodplain Map**
- 10 – Public Involvement**

Project Title: Proposed Property Acquisition and Future Air Cargo Development **Identifier:** ROA

11. PREPARER CERTIFICATION

I certify that the information I have provided above is, to the best of my knowledge, correct.



Signature

September 15, 2021

Date

Laura M. Stevens, AICP

Name

Senior Environmental Planner

Title

Parrish and Partners, LLC

Affiliation

(803) 978-7611

Phone #

12. AIRPORT SPONSOR CERTIFICATION

I certify that the information I have provided above is, to the best of my knowledge, correct. I also recognize and agree that no construction activity, including but not limited to site preparation, demolition, or land disturbance, shall proceed for the above proposed project(s) until FAA issues a final environmental decision for the proposed project(s), and until compliance with all other applicable FAA approval actions (e.g., ALP approval, airspace approval, grant approval) and special purpose laws has occurred.



Signature

September 15, 2021

Date

David Jeavons, CPA

Name

Director of Finance & Administration

Title

Roanoke Regional Airport Commission

Affiliation

(540) 362-1999 x 284

Phone #