

**DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
EASTERN REGION**



**WRITTEN RE-EVALUATION OF  
AUGUST 20, 2010 ENVIRONMENTAL IMPACT STATEMENT  
AND  
DECEMBER 31, 2010 RECORD OF DECISION**

**CAPACITY ENHANCEMENT PROGRAM  
PHILADELPHIA INTERNATIONAL AIRPORT  
PHILADELPHIA, PENNSYLVANIA**

## TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
• Introduction/Summary	3
• Legal Standards	6
• Comparison of Project Changes (Summary)	7
• Summary Of Changes To Environmental Impacts & Mitigation	7
• Comparison of the Proposed Project, the No-Action Alternative and Other Alternatives Evaluated in the FEIS	12
• Public Notification	13
• Conclusion	13
• Decision and Order	13
• Figure 1- Capacity Enhancement Program	16
• Figure 2- Cargo City Reconfiguration	17
• Appendix A- Environmental Technical Report	
• Appendix B- Agency Comments and Responses	

## **1. INTRODUCTION AND SUMMARY**

The Federal Aviation Administration (FAA) issued a Record of Decision (ROD) on December 31, 2010, which approved the construction of a new runway parallel to the current Runways 9L-27R and 9R-27L; the extension of Runway 8-26 and current Runway 9R-27L; associated taxiway improvements; terminal upgrades and reconfiguration; an automated people mover; and the relocation of on and off-airport facilities at Philadelphia International Airport (PHL), Philadelphia, Pennsylvania. Collectively, these projects are known as the Capacity Enhancement Program (CEP). The ROD, which is available at [www.faa.gov/airports/environmental/records\\_decision](http://www.faa.gov/airports/environmental/records_decision), followed an Environmental Impact Statement (EIS), completed on August 20, 2010, and notice that was published in the Federal Register on August 27, 2010. Copies of both documents are available at the FAA Eastern Regional Office, 1 Aviation Plaza, Jamaica, New York (718-553-2511) and at the Harrisburg Airports District Office, 3905 Hartzdale Drive, Suite 508, Camp Hill, Pennsylvania (717-730-2841).

The CEP, as evaluated in the Final EIS and depicted on PHL approved 2011 Airport Layout Plan, required the relocation of the UPS hub facility to accommodate the new east-west parallel runway on the south side of the airport. The UPS hub facility was to be relocated in an area west of the airport on property to be acquired from Tincum Township, Delaware County, PA. Just east of the relocated UPS, Cargo City would be redeveloped in its current location with some expansion into the existing International Plaza area. The International Plaza property would also need to be acquired. Airfield and roadway modifications were also designed to accommodate the CEP changes in this area.

The property identified for acquisition to accommodate the relocation of UPS and expansion of Cargo City in the CEP is termed the West Side Acquisition Area, which extends from the western-most airport boundary to 4<sup>th</sup> Avenue in Tincum Township. It totals 301.4 acres and includes 72 residences and 12 businesses that were proposed for relocation prior to UPS development (See Figure 1).

In April 2015, the City of Philadelphia, (the airport sponsor), approached FAA seeking approval to modify the CEP relocations of Cargo City and UPS. These modifications, known as the Cargo City Reconfiguration Plan, were developed in concert with Tincum Township officials in order to avoid or minimize residential and business relocations associated with the West Side Acquisition Area, while still accommodating the CEP. In accordance with the National Environmental Policy Act (NEPA), the FAA completed this Written Re-Evaluation for reconfigurations to the UPS and Cargo City areas; and the construction sequence. The basis for FAA's Written Re-evaluation was an Environmental Technical Report (June 2015), which analyzed and compared potential impacts associated with the Cargo City Reconfiguration Plan as compared to impacts associated with the CEP. A copy of the Environmental Technical Report can be found in Appendix A.

### **1.1 Proposed Cargo City Reconfiguration Plan/Comparison of Airport Layout Plans**

The fundamental change proposed under the Cargo City Reconfiguration Plan is the exchange of location between the relocated UPS hub facility and the redeveloped Cargo City facility (See

Figure 2). The Cargo City Reconfiguration Plan maintains the assumptions presented in the CEP, including operational forecasts, aircraft fleet mix, design aircraft, and runway configurations. While the layout of the individual buildings changes, the overall size and scope of the UPS and Cargo City operations remain relatively the same. One notable difference is that in order to meet Tinicum Township Green Space requirements, the UPS apron area would be built in two phases, with the second phase possibility requiring a modification or waiver to the Green Space requirements. Under the Cargo City Reconfiguration Plan, the total area for UPS and Cargo City is reduced by 276,103 square feet. The total area for related projects such as roads and maintenance hangars is reduced by 414,810 square feet. The table below provides a detailed comparison of the changes.

<b>Comparison of CEP and Cargo City Reconfiguration Footprint Areas</b>			
<i>All figures are in Square Feet (SF)</i>			
<b>Airport Component or Facility</b>	<b>Final EIS</b>	<b>Cargo City Reconfiguration</b>	<b>Difference in Footprint</b>
<b>Cargo City:</b>			
Taxiways	1,220,800	1,364,800	+ 144,000
Aprons/Ramps	1,792,200	1,425,300	- 366,900
Cargo Buildings	1,034,000	931,200	- 102,800
<b>UPS:</b>			
Taxiways	126,500	30,350	- 96,150
Aprons/Ramps	2,088,800	2,186,347	+ 97,547
Main Operations Building	680,000	678,500	- 1,500
Sorting and Freight Forwarding Buildings	88,400	138,100	+ 49,700
<b>Total Cargo/UPS Footprint:</b>	<b><u>7,030,700</u></b>	<b><u>6,754,597</u></b>	<b><u>- 276,103</u></b>
<b>Related Projects:<sup>1</sup></b>			
Public Roads	565,200	461,700	- 103,500
Small Maintenance Hangar	30,530	30,450	- 80
Large Maintenance Hangar	106,750	140,000	+ 33,250
Demolition of Existing Large Maintenance Hangar	Not Required	- 140,000	- 140,000
Demolition of the US Postal Service Building	Not Required	- 204,480	- 204,480
<b>Total Related Projects:</b>	<b><u>702,480</u></b>	<b><u>287,670</u></b>	<b><u>- 414,810</u></b>
<sup>1</sup> Two Glycol Tanks are required to be relocated in the <i>Cargo City Reconfiguration</i> plan; this was not required in the Final EIS plan. Source: Final EIS 2010, PHL Master Plan 2011 and <i>Cargo City Reconfiguration Airport Layout Plan 2014</i>			



## 1.2 Comparison of Land Acquisition

The 2010 EIS and ROD identified 301.4 acres in the West Side area needed for acquisition. The surveyed area needed under the Cargo City Reconfiguration Plan is 208.3 acres or 93.1 acres less than what was anticipated in the CEP. A small percentage of this reduction is attributed to actions such as sub-division of parcels and actual survey results, which are independent of the Cargo City Reconfiguration, but majority of the reduction comes from the smaller footprint of the reconfigured layout. The Cargo City Reconfiguration Plan would also avoid the relocation of 72 residences and 5 businesses in Tincum Township that are required under the current approved CEP plan.

## 1.3 Comparison of Construction Schedule

The duration of construction related to the Cargo City Reconfiguration Plan is essentially the same as that of the CEP. The sequencing or order of demolition and construction for the UPS hub facility and Cargo City facility differs from what is presented in the EIS and ROD. Under both the CEP and the Cargo City Reconfiguration Plan, various components of the UPS facility and Cargo City facility are constructed during the first ten years of the CEP construction. The revised construction sequence only pertains to actions under the Cargo City Reconfiguration Plan. All other CEP construction activities remain unchanged in terms of duration and phasing. The table below provides a detailed comparison of the construction schedules.

<b>Summary of Changes to Construction Schedule</b>				
<i>In terms of Construction Year number</i>				
<b>Activity</b>	<b>Final EIS Start Year</b>	<b>Final EIS End Year</b>	<b>Cargo City Reconfiguration Start Year</b>	<b>Cargo City Reconfiguration End Year</b>
Build new UPS facility	1	4	7	10
Demolish existing Cargo City facilities	4	4	7	7
Build new Cargo City facilities	4	10	1	7
Demolish existing UPS facility	10	10	10	10
Build small maintenance hangar	1	2	2	3
Build large maintenance hangar	5	7	1	4
Relocate Tincum Island Road	2	2	2	2
Relocate glycol tanks	N/A	N/A	1	1
Demolition of existing	N/A	N/A	4	4

large maintenance hangar				
Demolish US Postal Service building	N/A	N/A	7	7

## 2. LEGAL STANDARDS

To ensure full compliance with the National Environmental Policy Act (NEPA), the FAA is evaluating the change in environmental impacts, in order to determine if a supplemental EIS is required. This Written Re-Evaluation follows guidance provided by FAA Environmental Orders 1050.1E and 5050.4B. Both Orders reference re-evaluating NEPA documents when there are new circumstances or information relevant to environmental concerns that come to light after the FAA has issued a ROD.

Pursuant to 40 C.F.R. 1502.9(c)(1) “agencies shall prepare supplements to either draft or final environmental impact statements if...there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.” FAA Orders 1050.1E and 5050.4B provide guidance as to the circumstances under which it is necessary to supplement an EIS. FAA Order 1050.1E, paragraph 515 provides that where there are changes in the proposed action, or new information relevant to environmental concerns, the FAA may prepare a written evaluation that will either conclude the contents of previously prepared environmental documents remain valid or that significant changes require the preparation of a supplement or new EIS.

FAA Order 1050.1E, paragraph 515a, states “The preparation of a new EIS is not necessary when it can be documented that the:

- (1) Proposed action conforms to plans or projects for which a prior EIS has been filed and there are no substantial changes in the proposed action that are relevant to environmental concerns;
- (2) Data and analyses contained in the previous EIS are still substantially valid and there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts; and
- (3) Pertinent conditions and requirements (all) of the prior approval have, or will be, met in the current action.”

Paragraph 516a of FAA Order 1050.1E defines significant information as “information that paints a dramatically different picture of impacts compared to the description of impacts in the EIS.

If the proposed changes do not meet the criteria in paragraph 515 a (1)-(3), then further analysis is necessary.”

Per FAA Order 5050.4B, paragraph 1402 (b):

A supplement to the FEIS for this project is required if:

- (1) The airport sponsor or FAA makes substantial changes in the proposed action that could affect the action's environmental effects; or
- (2) Significant new changes, circumstances or information relevant to the proposed action, its affected environment, or its environmental impacts becomes available.

Order 5050.4B also discusses the format and circulation of a Written Re-Evaluation:

d. Format and circulation. The responsible FAA official should develop a format to prepare a written re-evaluation. The re-evaluation should be reviewed internally. The responsible FAA official should place a copy of the re-evaluation in the project's administrative file. The responsible FAA official need not make the written re-evaluation available to the public. However, that document may be made available to the public at the discretion of the responsible FAA official.

### **3. COMPARISON OF PROJECT CHANGES (SUMMARY)**

The proposed Cargo City Reconfiguration Plan layout, when compared to the CEP layout, is very similar. Under both scenarios, the UPS facilities and the Cargo City facilities would be replaced in kind. However, by exchanging the locations of the UPS and Cargo City facilities, the overall footprint is reduced, which results in several changes to impacts depicted in the CEP EIS. These include:

- Avoidance of the relocation of all 72 residences and 5 of the 12 businesses in Tinicum Township;
- Increased distance between Tinicum Township homes and the new UPS facility;
- Reduced noise impacts on Tinicum Township from UPS aircraft ground operations;
- Reduced UPS truck travel time to and from Interstate 95;
- Reduced overall average UPS aircraft taxi time to and from runway ends;
- Reduced construction and operational air emissions; and
- Reduced amount of new impervious surfaces thereby, reducing rainfall runoff and local area flood area potential.

### **4. SUMMARY OF CHANGES TO ENVIRONMENTAL IMPACTS & MITIGATION**

The following resources are not present in the West Side Acquisition Area and, therefore, were not considered in the Written Reevaluation.

- Farmlands
- Section 4(f) and Section 6(f) Resources
- Historic, Architectural, Archaeological, and Cultural Resources
- Wild and Scenic Rivers
- Federal Threatened and Endangered Species

## **4.1 Noise**

### **4.1.1 Aircraft Flight Operations Noise**

Under the proposed Cargo City Reconfiguration Plan, none of the aircraft fleet mix, operations, runway use, or flight tracks would change from what was analyzed in the EIS. Therefore, there would be no changes in the noise contours. There is one reporting change. The CEP required the acquisition of 72 residences in Tinicum Township. These residences qualified for sound attenuation under the airport's Residential Sound Insulation Program (RSIP) but were not reported as impacted under the CEP because they were assumed to have been acquired. Of the 72 residences, 11 opted not to participate in the RSIP. These residences will be offered sound attenuation again under the proposed Cargo City Reconfiguration Plan.

### **4.1.2 Ground-Based Aircraft Noise**

Under the Cargo City Reconfiguration Plan, the UPS ground-based aircraft operations will move approximately 1,400 feet farther away from the nearest residential parcel as compared to the CEP plan. The Cargo City Reconfiguration Plan will not change the taxiway, queuing, runway use, or engine maintenance run-up procedures discussed in the EIS. In addition, auxiliary power unit and ground power unit noise sources will remain the same. As stated in the EIS, the predominant noise impact is from aircraft flight operations, so this change to the ground-based operations does not affect the total aircraft noise exposure.

### **4.1.3 Surface Transportation Noise**

Consistent with the projected growth in truck traffic associated with the CEP, the proposed Cargo City Reconfiguration Plan will result in incremental increases in noise from trucks. This is due to forecasted vehicle traffic growth and the realignment of Tinicum Island Road. The Cargo City Reconfiguration Plan will change the realignment of Tinicum Island Road, resulting in noise increase of approximately 7 A-weighted decibels Day Night Average Sound Level (dBA DNL) at some receptor points and decreases in noise at other noise receptors. None of these changes will result in significant increases in surface transportation noise levels because the noise levels at these receptor points remain below 60 dBA DNL, even with the Cargo City Reconfiguration Plan.

### **4.1.4 Temporary (Construction) Noise**

Temporary construction-related noise can result from aircraft flight changes resulting from airfield construction work-around procedures, such as runway closures and from construction equipment noise. The Cargo City Reconfiguration Plan would not affect the schedule of runway closures and, therefore, have no effect on aircraft flight noise levels. Noise from construction activities would still occur in the northwest quadrant of the airport. The changes in construction noise would be to the years during which the maximum sound levels occur. The maximum sound levels are associated with pile driving for facility foundations. Under the CEP, the loudest sound levels would occur during Construction Years 1 and 2. Under the Cargo City Reconfiguration Plan, pile driving would occur during Construction Years 1 and 2 (for Cargo City facility foundations) and Construction Years 7 and 8 (for UPS facility foundations). The mitigation measures described in the Final EIS (i.e. mufflers on equipment, pneumatic exhaust silencers, portable or temporary noise barriers, and best management practices) will be used where practical to reduce noise during construction.

#### **4.2 Social and Economic Impacts**

The Cargo City Reconfiguration Plan reduces the amount of Tincum Township property required for acquisition by approximately fourteen acres, avoids acquiring 72 residential properties, and reduces business relocations from twelve to seven. Under the CEP, as presented in the EIS, Tincum Township, the Interboro School District, and Delaware County taxing districts would be negatively impacted by the loss of taxes from properties acquired to support the project. The Cargo City Reconfiguration Plan scales back the number of properties to be acquired reducing the annual tax impact by \$35,256 for Tincum Township, \$267,552 for Interboro School District, and \$44,587 for Delaware County. The reduction in business acquisitions results in ninetyseven jobs remaining in the area. No other social or economic impact will change as a result of the reconfiguration.

#### **4.3 Compatible Land Use**

The Cargo City Reconfiguration Plan would not result in any additional incompatible land uses. Although the Cargo City Reconfiguration Plan reports an additional 72 homes within an area of significant noise levels (65 dBA DNL), these homes were already impacted by noise but not counted in the EIS since they were assumed to be acquired. Residences within the 65 dBA DNL contour that are not already sound insulated will also be offered the opportunity for sound insulation. The reconfiguration will not increase or create any wildlife hazards.

#### **4.4 Environmental Justice and Children's Health and Safety**

There are no new or greater impacts to minority or low-income populations as a result of the Cargo City Reconfiguration Plan. There would also be no impacts to drinking water, recreational waters, or other products or substances that a child may come in contact. Therefore, the finding of no significant impact as presented in the CEP EIS remains valid.

#### **4.5 Surface Transportation**

The analysis and data pertaining to off-airport surface transportation would be unchanged under the Cargo City Reconfiguration Plan. Traffic coming and going to and from the Airport; the volume of traffic; and traffic signal timing at the off-airport intersections and roadways will not change when compared to the CEP. On-airport surface transportation would be altered to accommodate the exchanged locations of UPS and Cargo City. UPS would be closer to Scott Way, the entrance used by UPS trucks, thereby, reducing the travel time, planned under the CEP, away from Tincum Township. As with CEP, there will be no significant impacts to surface transportation.

#### **4.6 Air Quality**

The only potential changes to air emissions attributed to the Cargo City Reconfiguration Plan are those connected to changes in construction activities and schedules, cargo aircraft taxi distances, and cargo truck traffic associated with the UPS and Cargo City facilities. All other air emissions, i.e. those related to things such as aircraft operations, construction in other locations or for other components, aircraft idling, etc. remain the same.

##### **4.6.1 Construction Emissions**

The technical report provides a comparison of construction air emissions between the Cargo City Reconfiguration Plan and the CEP for the 13-year construction period. On a cumulative basis,

the total emissions will be lower under the Cargo City Reconfiguration Plan. On an annual basis, total emissions under the Cargo City Reconfiguration Plan are greater during construction years 4, 5, 8, 9 and 11 when compared to CEP. These increases however, are still well below the applicable de-minimis thresholds. During construction years 2, 3, 6, 7 and 10 annual emissions under the Cargo City Reconfiguration Plan are lower than CEP for the same years. During construction years 1, 12, and 13, there are essentially no differences in annual construction emissions between the Cargo City Reconfiguration Plan and CEP.

Consistent with the analysis for the CEP and the General Conformity Determination, the emissions inventories for both CEP and Cargo City Reconfiguration Plan include previously approved AERCs (airport emission reduction credits) and ERC (emission reduction credits). The AERC's were acquired over the years through PHL's participation in FAA's Voluntary Airport Low Emissions (VALE) program. Under this program, emission reductions can be converted to AERCs for use in meeting General Conformity requirements. The ERCs were purchased through the PA Department of Environmental Protection ERC registry (PA Administrative Code §127.209). These AERCs and ERCs are used to reduce or offset construction related emissions to levels below the de minimis thresholds during certain construction years. Since the airport has already undertaken the emission reduction projects needed to generate the AERCs and acquired the ERCs, no new or additional AERCs or ERCs will be needed for the Cargo City Reconfiguration Plan.

#### 4.6.2 Operational Emissions

The only operational changes attributed to the Cargo City Reconfiguration Plan are the changes in cargo aircraft taxi distances and cargo truck travel distances associated with the change in locations. The Cargo City Reconfiguration Plan would position UPS and Cargo City facilities in a manner that would reduce the average aircraft taxiway paths. The reduced taxing time will result in lower aircraft emissions. The Cargo City Reconfiguration Plan would also reduce cargo truck travel distances by approximately a half of a mile. This reduced travel distance will reduce vehicle emissions.

#### **4.7 Wetlands and Waterways**

The Cargo City Reconfiguration Plan would result in slightly greater impacts to the Long Hook wetland and waterway system, including the need to fill and grade portions of the wetland, and rerouting and adding culverts within parts of the waterway. Under the Cargo City Reconfiguration Plan, the Creek would be rerouted along the airport boundary near Seminole, Manhattan, and Iroquois Streets in Tinicum Township, and then farther south along the west and south sides of the relocated cargo facility, connecting into an existing ditch near the west end of existing Runway 9R-27L. Within the CEP project area, there are 155.7 acres of Section 404 jurisdictional wetlands. The CEP would have impacted a total of 35 acres of wetlands (22.5% of the total wetlands); whereas the Cargo City Reconfiguration Plans will impact 36.3 acres of wetlands (23.3% of the total wetland). There are also 52.2 acres of Section 404 jurisdictional waterways within the CEP project area. The CEP would have impacted a total of 23.1 acres of waterways (44.2% of the total waterways); whereas the Cargo City Reconfiguration Plans will impact 23.2 acres of wetlands (44.4% of the total waterways). These increased impacts represent a very small percentage change, a 1.1 percent increase in total wetland impacts and a 0.2 percent increase in total waterway impacts. These impacts will be off-set by mitigation.



#### **4.8 Coastal Resources**

The entire airport property is located within the Delaware Estuary Coastal Zone. Therefore, all projects must be consistent with the state's Coastal Zone Management Program (CZM). The Pennsylvania CZM Plan considers several policies that are relevant to the airport. These policies are: Coastal Hazard Areas; Dredging and Spoil Disposal; Fisheries Management; Wetlands; Public Access for Recreation; Historic Sites and Structures; Port Activities; and Public Involvement. The Cargo City Reconfiguration Plan will result in changes to the policy categories listed below:

- Coastal Hazard Areas: The Cargo City Reconfiguration Plan reduces floodplain impacts.
- Wetlands: The Cargo City Reconfiguration Plan would increase non-tidal wetland impacts. Mitigation for impacts would take place within the PA Coastal Zone.

Affects to all other PA CMZ categories remain as presented in the CEP EIS. The NJ Coastal Management Plan (CMP) also considers dredging in the PA side of the Delaware River. Consistency with the NJ CMP is not affected by the Cargo City Reconfiguration Plan since purposed changes are not in the Delaware River area and have no impact on dredging.

#### **4.9 Water Quality**

Airport features or activities that can affect water quality include: deicing, refueling, maintenance, road and parking lot runoff, river fill, and total impervious surface area. For everything except impervious surface area, all anticipated impacts would be identical to CEP. Under the Cargo City Reconfiguration Plan, impervious surface area would decrease by 7.2 acres. This decrease in impervious surface area is a positive change.

#### **4.10 Floodplains**

The entire PHL property lies within the 100- or 500-year tidal floodplains of the Delaware River. Because of this, impacts to floodplains are unavoidable under the CEP and with the modifications outlined in the Cargo City Reconfiguration Plan. Under the CEP, floodplain impacts amounted to 347 acres. The Cargo City Reconfiguration Plan impacts 7.2 fewer acres of floodplains for a total of 339.8 acres.

#### **4.11 Biotic Communities**

There are several state-listed Threaten and Endangered Species habitat in the northwest area of the UPS and Cargo City locations within the Long Hook Creek watershed. Threatened and Endangered Species whose habitat may be impacted by CEP and the Cargo City Reconfiguration Plan include the Threespine Stickelback, the Eastern Mudminnow, and the Red-bellied Turtle. Of the known Threaten and Endangered Species in the area, impacts to the Red-bellied Turtle habitat will increase as a result of the Cargo City Reconfiguration Plan. The CEP estimated 9.0 acres of Red-bellied Turtle habitat would be impacted, whereas the Cargo City Reconfiguration Plan would impact 9.22 acres of habitat. This additional 0.22 acres of habitat impact is continuous with, and serves the same functions as, those existing throughout the Long Hook Creek watershed. As with the CEP, mitigation for impacts to Red-bellied Turtle habitat would be addressed in accordance with permit conditions.

#### **4.12 Hazardous Materials and Solid Wastes**

The potential for impacts to hazardous materials and the generation of solid wastes is associated with construction. Within the area of the Cargo City Reconfiguration Plan there are four sites of concern. These sites are: the Hertz Maintenance Facility, the existing Cargo Building C-5, the PHL maintenance and storage building, and International Plaza. These sites are identical to the ones identified in the CEP. Impacts to these sites would be same under the CEP or the Cargo City Reconfiguration Plan.

#### **4.13 Light Emissions**

Light emissions can potentially cause annoyance and/or interfere with normal activities. Under the CEP, lighting associated with the UPS facility would be the closest to neighboring areas. The Cargo City Reconfiguration Plan relocates UPS farther from residents but moves the Cargo City facility in its place. The Cargo City facility has a smaller footprint and a lower operational density than UPS therefore, light emissions under the Cargo City Reconfiguration Plan will be equal to or less than CEP. The CEP stipulated that lighting fixtures would include downcast hoods to avoid light propagation to neighboring areas. This same stipulation would apply to the proposed Cargo City Reconfiguration Plan.

#### **4.14 Energy Supply and Natural Resources**

The CEP determined that there would be an increase in electrical use due to the increase in terminal space and the additional lighting associated with the added airfield components. The use of aircraft and vehicle fuels was projected to decrease due to more efficient operations. Ground support equipment usage and associated fuel consumption will increase as aircraft operations increase. Freight train fuel use will also increase under the CEP. None of these changes in energy and natural resources consumption were considered significant, nor will the Cargo City Reconfiguration Plan alter any of these findings.

### **5. COMPARISON OF THE PROPOSED PROJECT, THE NO-ACTION ALTERNATIVE, AND OTHER ALTERNATIVES EVALUATED IN THE FINAL EIS**

The FAA has considered whether the modifications proposed under the Cargo City Reconfiguration Plan would have influenced the selection of the preferred alternative in the EIS. The ROD, Section 7.3, page 16-18, describes why Alternative A was selected, and how it was preferable to Alternative B. As discussed in the EIS, both alternatives resulted in the need to relocate UPS and acquire the West Side Acquisition Area. The proposed Reconfiguration of Cargo City, and the resulting environmental changes, would apply to both EIS alternatives. The Cargo City Reconfiguration Plan modifications will not result in any significant environmental impacts. Therefore, the FAA's selection of a Preferred Alternative remains unchanged.



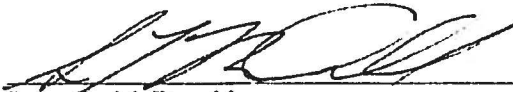
## 6. PUBLIC NOTIFICATION

The Cargo City Redevelopment Plan was a result of numerous meetings between Tinicum Township officials and PHL officials. A primary reason for this modification was to reduce the overall footprint of the project and, thereby, avoid or lessen impacts to residents and business in Tinicum Township. A technical report, (Appendix A), was prepared by PHL to assess the potential impacts associated with Cargo City Reconfiguration Plan. The updated information described above, along with the draft Written Reevaluation, was made available to the public and resource agencies for a period of thirty days. In addition; this Written Reevaluation was posted on the PHL website and the FAA Eastern Region website. A Notice of Availability will be published in the Federal Register.

## 7. CONCLUSION

The proposed action conforms to the plans included in the EIS. There are no substantial changes that are relevant to environmental concerns. Except as described above, the data and analyses contained in the EIS are still substantially valid and there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. Pertinent conditions and requirements of the prior approval have, or will be, met in the current action. The preparation of a new or Supplemental EIS is not necessary.

Responsible Federal Official:



Susan L. McDonald  
Environmental Protection Specialist  
FAA Eastern Region, Airports Division,  
Harrisburg Airport District Office

8/27/2015  
Date

## 8. DECISION AND ORDER

This document is prepared pursuant to FAA Orders 1050.1E, Environmental Impacts: Policies and Procedures, Paragraphs 515 and 516, and 5050.4B, National Environmental Policy Act Implementing Instructions for Airport Actions, Paragraph 1401.

After careful and thorough consideration of the facts contained in this Written Re-Evaluation, the 2010 Final Environmental Impact Statement and the 2010 Record of Decision for the Capacity Enhancement Program at the Philadelphia International Airport, the undersigned makes the following findings:

**(1) The proposed action conforms to plans or projects for which a prior EIS has been filed, and there are no substantial changes in the proposed action that are relevant to environmental concerns.**

The primary change associated with proposed Cargo City Reconfiguration Plan is the switching of locations between the UPS hub and the Cargo City facilities. The overall footprint of the CEP will be reduced, thus avoiding the taking of 72 residences and 5 business. All other components of the CEP remain as presented in the Final EIS and ROD.

**(2) Data and analyses contained in the previous EIS are still substantially valid, and there are no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impact.**

The proposed Cargo City Reconfiguration Plan reduces the amount of Tinicum Township property required for acquisition by approximately fourteen acres, avoids 72 residential acquisitions, and reduces business relocations from twelve to seven. This scaling back of properties to be acquired reduces the annual tax impact by \$35,256 for Tinicum Township, \$267,552 for Interboro School District, and \$44,587 for Delaware County. The reduction in business acquisitions results in ninety-seven jobs remaining in the area. There are also changes in noise impacts that are associated with modifications to the surface transportation routes and time of construction. None of these changes will result in significant increases in noise, although there will be some noise receptors that will experience either increases or decreases in noise levels. Changes in the construction schedule will alter the years during which the maximum construction noise occurs, but will not result in a longer construction period. The years in which air quality emissions are highest, yet still below applicable de-minimis thresholds, will also change with the modified construction schedule.

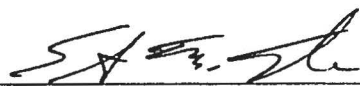
When compared to the CEP, impacts to Section 404 jurisdictional wetlands will increase by 1.3 acres under the Cargo City Reconfiguration Plan, for a total impact of 36.3 acres. There will also be a 0.1 acre increase in Section 404 jurisdictional waterway impacts for a total impact of 23.2 acres. These increased impacts represent a very small percentage change, a 1.1 percent increase in total wetland impacts and a 0.2 percent increase in total waterway impacts. With the changes to Long Hook Creek watershed, there will be an additional 0.22 acres of Red-bellied Turtle habitat impacted. This will be off-set with mitigation. The impervious surface area will decrease by 7.2 acres, thus reducing any potential impacts to water quality and floodplains. Impacts, or changes, to all other resources will remain essentially the same as what was presented in the EIS and ROD. For these reasons, the updated information presented in this Written Re-evaluation does not paint a dramatically different picture of the proposed action or its impacts compared to the description presented in the EIS and ROD.

**(3) All pertinent conditions and requirements of the prior approval have, or will be, met in the current action.**

The projects that were the subject of the FAA's 2010 Record of Decision were approved with certain requisite findings, and conditions, including implementation of mitigation measures outlined in the Record of Decision to address unavoidable environmental consequences of the FAA's decision. The FAA has reviewed the status of the findings it made in the 2010 Record of Decision and has determined that these findings remain valid. Additionally, the FAA has reviewed the status of the PHL's compliance with the conditions of approval associated with the project and finds that the PHL is in compliance with them and/or will comply with them.

Accordingly, under the authority delegated to me by the Administrator of the FAA, I conclude that there is no requirement to complete a new or supplemental EIS to support this ROD. I hereby direct that PHL ALP be revised and unconditionally approve to reflect the Cargo City Reconfiguration Plan pursuant to 49 U.S.C. § 40103(b) and § 47107(a)(16).

Approving Official:

  
for \_\_\_\_\_  
Carmine Gallo  
Regional Administrator, FAA Eastern Region  
For Federal Aviation Administration

9/4/2015  
Date

This decision presents the Federal Aviation Administration's final decision and approvals for the actions identified, including those taken under the provisions of Title 49 of the United States Code, Subtitle VII, Parts A and B. This decision constitutes a final order of the Administrator subject to review by the Courts of Appeal of the United States in accordance with the provisions of 49 U.S.C. § 46110. Any party seeking to stay the implementation of this ROD must file an application with FAA prior to seeking judicial relief, as provided in Rule 18(a), Federal Rules of Appellate Procedure.

**Figure 1**  
**Capacity Enhancement Program**

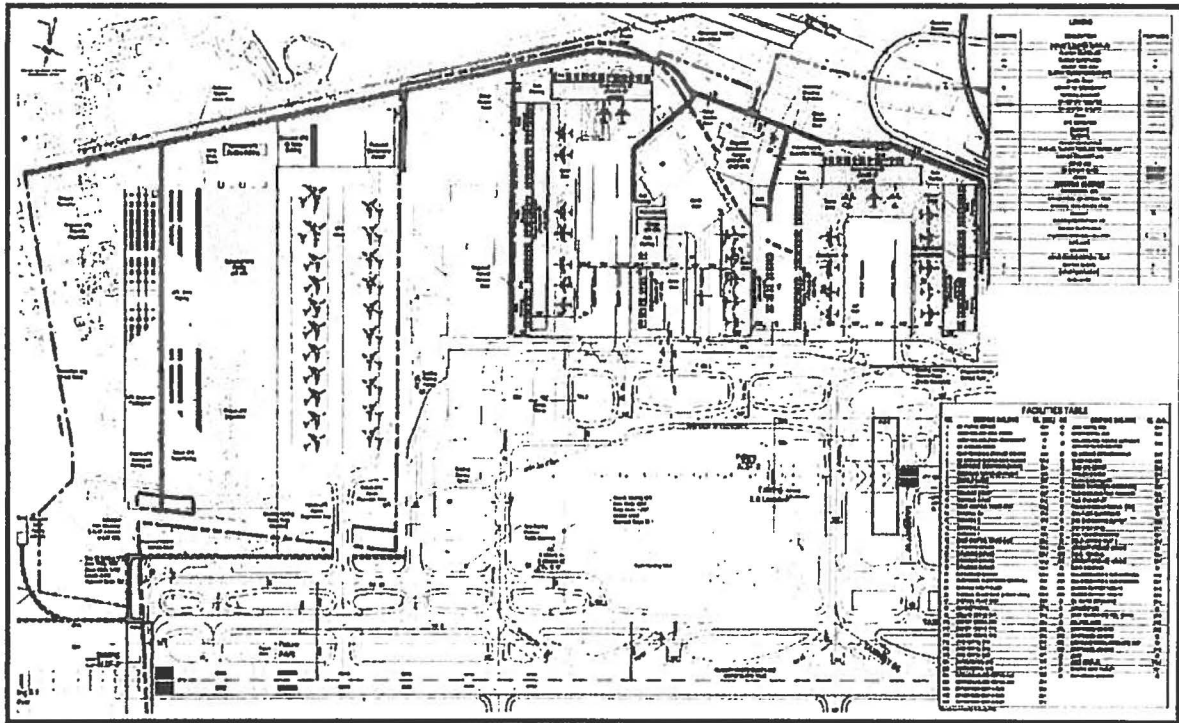
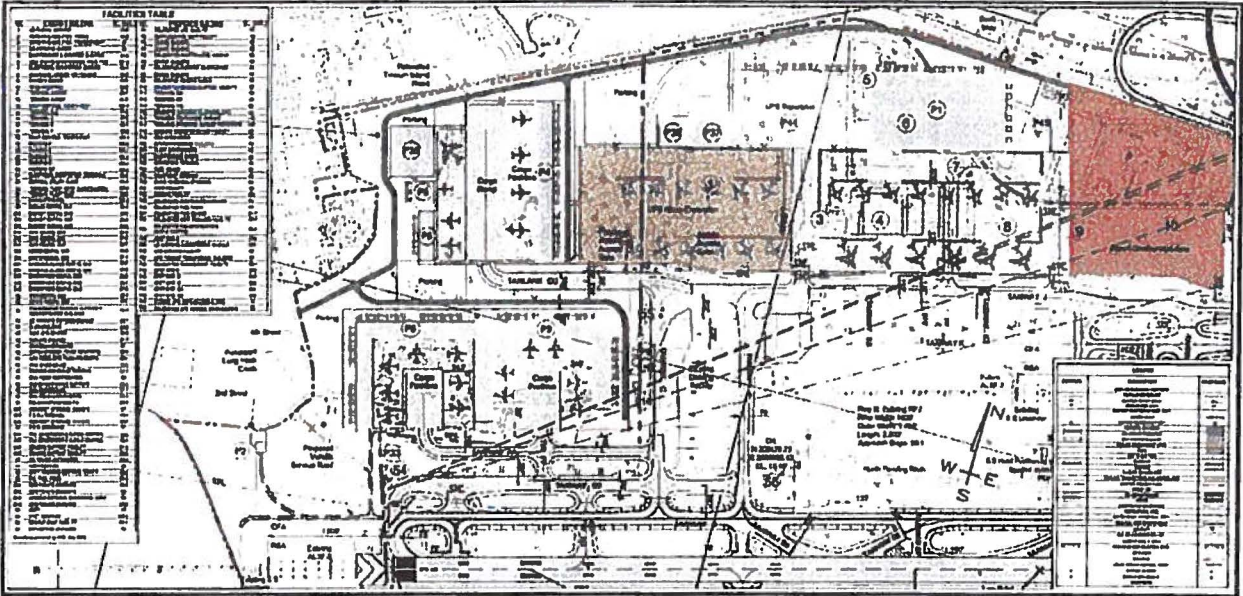


Figure 2  
Cargo City Reconfiguration



**Appendix A**  
**Environmental Technical Report**

## Appendix B

### Agency Comments and Responses

**McDonald, Susan (FAA)**

---

**From:** Librandi Mumma, Tracey <tlibrandi@pa.gov>  
**Sent:** Tuesday, August 11, 2015 1:35 PM  
**To:** McDonald, Susan (FAA)  
**Subject:** PHL Cargo City Reconfiguration Plan

Hi Sue,

Thanks you for the opportunity to review the Philadelphia International Airport's Capacity Enhancement Program Cargo City Reconfiguration Plan. The PGC has no comments on the plan.

Thanks,

*Tracey Librandi Mumma*

Wildlife Biologist / Habitat Protection Section Chief  
Environmental Planning & Habitat Protection Division  
Bureau of Wildlife Habitat Management  
Pennsylvania Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110  
717-787-4250 ext 3614  
Fax 717-787-6957  
[tlibrandi@pa.gov](mailto:tlibrandi@pa.gov)



**McDonald, Susan (FAA)**

---

**From:** Bonner, Edward E NAP <Edward.E.Bonner@usace.army.mil>  
**Sent:** Friday, August 21, 2015 3:20 PM  
**To:** McDonald, Susan (FAA)  
**Subject:** CEP Re-evaluation (July 2015) (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Sue,

I reviewed the re-evaluation document referenced in the letter from your office dated July 24, 2015 for the CEP at Philadelphia International Airport. I would concur that the re-configuration plan involves only a minor change in the impacts to wetlands and waters of the United States. I would also note that the specific details of the stream relocation (i.e. width, depth, embankment slopes, etc.) would be addressed when the permit application for this work is submitted. Further, I would also recommend that the FAA and City of Philadelphia continue the investigation and design process related to the impacts to wetlands and waters anticipated with the CEP.

Edward E. Bonner  
Senior Staff Biologist  
Regulatory Branch  
U.S. Army Corps of Engineers  
Philadelphia District  
215-656-5932  
[Edward.e.bonner@usace.army.mil](mailto:Edward.e.bonner@usace.army.mil)

Classification: UNCLASSIFIED  
Caveats: NONE



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17055  
(717) 730-2830

RECEIVED

July 24, 2015

Meghan Baratta  
NJ Historic Preservation Office  
501 East State St.  
PO Box 404  
Trenton, NJ 08625-0423

JUL 2 2015  
15-1977-14 11/14  
HISTORIC PRESERVATION OFFICE  
HPO-412015-182

Dear Ms. Baratta:

In 2010, the Federal Aviation Administration (FAA) completed an Environmental Impact Statement (EIS) addressing a major capacity project at the Philadelphia International Airport (PHL). This project included; the construction of a new runway parallel to the current Runways 9L-27R and 9R-27L; the extensions of Runway 8-26 and current Runway 9R-27L; associated taxiway improvements; terminal upgrades and reconfiguration; an automated people mover; and the relocation of on and off-airport facilities at the airport. Collectively, these components are known as the Capacity Enhancement Program (CEP). A Record of Decision (ROD), which approved the CEP, was issued on December 31, 2010. Throughout development of the EIS, representatives from your agency were involved in the process.

The CEP, as evaluated in the Final EIS and depicted on PHL's approved 2011 Airport Layout Plan, required the relocation of the UPS hub facility to accommodate the new east-west parallel runway on the south side of the airport. The UPS hub facility was to be relocated in an area west of the airport on property to be acquired from Tinicum Township, Delaware County, PA. Just east of the relocated UPS, Cargo City was to be redeveloped in its current location with some expansion into the existing International Plaza area. The International Plaza property would also need to be acquired. Airfield and roadway modifications were also designed to accommodate the CEP changes in this area. The property identified for acquisition to accommodate the relocation of UPS and expansion of Cargo City in the CEP is termed the West Side Acquisition Area, which extends from the western-most airport boundary to 4<sup>th</sup> Avenue in Tinicum Township. It totals 301.4 acres, and includes 72 residences and 12 businesses that were proposed for relocation prior to the UPS development.

In April 2015, the City of Philadelphia (the airport sponsor) approached FAA seeking approval to modify the CEP relocations of Cargo City and UPS. These modifications, known as the Cargo City Reconfiguration Plan, were developed in concert with Tinicum Township officials in order to avoid or minimize residential and business acquisitions associated with the West Side Acquisition Area, while still accommodating the CEP. The

OS-1777-16  
HPO-4/2015-182

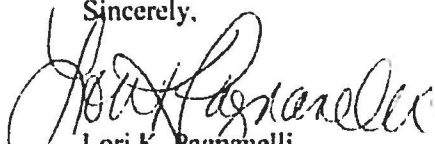
fundamental change proposed under the Cargo City Reconfiguration Plan is the exchange of location between the relocated UPS hub facility and the redeveloped Cargo City facility. This exchange of locations reduces the total area for UPS and Cargo City by 276,103 square feet and the total area for related projects, such as roads and maintenance hangars, by 414,810 square feet.

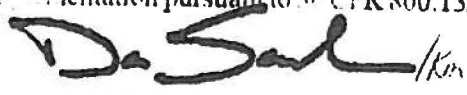
In accordance with the National Environmental Policy Act (NEPA), the FAA completed a draft Written Re-Evaluation for the Cargo City Reconfiguration Plan. The basis for FAA's draft Written Re-evaluation was an Environmental Technical Report (June 2015), which analyzed potential impacts associated with the Cargo City Reconfiguration Plan as compared to impacts associated with the CEP. The FAA is now seeking comments on the draft Written Reevaluation. The comment period will run for a period of 30 days, from July 28, 2015 through August 26, 2015.

The draft Written Reevaluation with the Environmental Technical Report is available for review at <http://www.faa.gov/airports/eastern/environmental/>. Hard copies of the documents are also available at the FAA's Harrisburg Airport District Office, 3905 Hartzdale Drive, Suite 508, Camp Hill, PA and at the Philadelphia International Airport, 1 International Plaza Drive, Suite 100, Philadelphia, PA. Those wishing to review the hard copies should contact Sue McDonald, ADO Environmental Protection Specialist, at (717) 730-2841 for the Camp Hill, PA location or Ray Scheinfeld at (215) 937-5404 for the Philadelphia, PA location. Comments should be submitted to Sue McDonald, Harrisburg Airport District Office, 3905 Hartzdale Drive, Suite 508, Camp Hill, PA 17011 or by email at [susan.mcdonald@faa.gov](mailto:susan.mcdonald@faa.gov), no later than COB August 26, 2015.

Should you have any questions, please contact me or Sue McDonald at (717) 730-2841.

Sincerely,

  
Lori K. Pagnanelli  
Manager

<p>and site our finding that there are no historic resources affected within the project's area of potential impact. Consequently, pursuant to 36 CFR 800.4(d)(1), no further Section 106 consultation is required unless additional resources are discovered during project implementation pursuant to 36 CFR 800.13.</p> <p> /km Daniel B. Saunders Deputy State Historic Preservation Officer</p> <p>8/19/2015 Date</p>
--

based on our understanding this change to the project  
will be located in Pennsylvania and have no effects  
on properties in New Jersey.

## McDonald, Susan (FAA)

---

**From:** McCurdy, Alaina <McCurdy.Alaina@epa.gov>  
**Sent:** Thursday, September 03, 2015 3:10 PM  
**To:** McDonald, Susan (FAA)  
**Cc:** Lapp, Jeffrey; Rudnick, Barbara  
**Subject:** PHL Airport Re-evaluation

Hi Sue,

Thank you for providing EPA with the opportunity to review the NEPA Re-evaluation for the Philadelphia Airport CEP and provide comments for FAA's consideration. We appreciate being included in this process and look forward to working with FAA as this project moves forward.

Below are some comments for your consideration. In the interest of time, these comments do not include any review from EPA's Air Protection Division. We hope to discuss comments, including any air related comments, with you by phone. I would be happy to coordinate a time at your convenience.

Sincerely,  
Alaina

- We encourage FAA to continue to conduct meaningful engagement of stakeholders, particularly communities that are in close proximity to the airport that are likely to be most affected by the proposed action. Please continue to ensure that community members are aware of the proposed changes and have the opportunity to review and provide comment as appropriate.
- The Environmental Justice analysis presented in the re-evaluation states that the FEIS concluded that the PHL CEP will not have a significant adverse impact or disproportionate impacts to minority or low-income populations. Please consider whether the EJ analysis could be updated using more recently available data than was used in the FEIS in order to support this conclusion, possibly utilizing 2010 Census data. We continue to urge FAA to improve the EJ analysis and EPA reiterates comments and suggestions previously made regarding the EJ analysis for this project.
- Please be aware that on December 18, 2014, the Council on Environmental Quality released revised draft guidance for public comment that describes how Federal departments and agencies should consider the effects of greenhouse gas emissions and climate change in their National Environmental Policy Act reviews. The revised draft guidance supersedes the draft greenhouse gas and climate change guidance released by CEQ in February 2010. This guidance explains that agencies should consider both the potential effects of a proposed action on climate change, as indicated by its estimated greenhouse gas emissions, and the implications of climate change for the environmental effects of a proposed action.

"CEQ recognizes that many agency NEPA analyses to date have concluded that GHG emissions from an individual agency action will have small, if any, potential climate change effects. Government action occurs incrementally, program-by-program and step-by-step, and climate impacts are not attributable to any single action, but are exacerbated by a series of smaller decisions, including decisions made by the government. Therefore, the statement that emissions from a government action or approval represents only a small fraction of global emissions is more a statement about the nature of climate change challenge, and is not an appropriate basis for deciding whether to consider climate impacts under NEPA. Moreover, these comparisons are not an appropriate method for characterizing the potential impacts associated with a proposed action and its alternatives and mitigations."

The revised draft guidance suggests that, if an agency determines that evaluating the effects of GHG emissions would not be useful in the decision making process and to the public to distinguish between the proposed action, alternatives and mitigations, the agency should document the rationale for that determination.

FAA should ensure that the discussion of climate change in the PHL CEP is consistent with this recent guidance. This guidance is available in full at:  
[http://www.whitehouse.gov/sites/default/files/docs/nepa\\_revised\\_draft\\_ghg\\_guidance\\_searchable.pdf](http://www.whitehouse.gov/sites/default/files/docs/nepa_revised_draft_ghg_guidance_searchable.pdf)

-----  
Alaina McCurdy  
Office of Environmental Programs  
U.S. EPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103  
phone: (215)814-2741  
fax: (215)814-2783

-----  
Alaina McCurdy  
Office of Environmental Programs  
U.S. EPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103  
phone: (215)814-2741  
fax: (215)814-2783



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Harrisburg Airports District Office  
3905 Hartzdale Drive, Suite 508  
Camp Hill, PA 17055  
(717) 730-2830

September 4, 2015

Alaina McCurdy  
Office of Environmental Programs  
U.S. Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103

Dear Ms. McCurdy:

Thank you for email dated September 3, 2015, which provided comments on the FAA's Written Reevaluation/ Record of Decision (WR/ROD) of the Capacity Enhancement Program (CEP). The WR/ROD specifically addressed the proposed Cargo City Reconfiguration Plan. There were no other proposed changes to the CEP as presented in the 2010 Environmental Impact Statement (EIS). The WR/ROD was made available for a thirty-day comment period beginning on July 28, 2015.

On August 30, 2015, EPA contacted FAA requesting an extension to the comment period. As explained in our telephone conversation on September 1, the WR/ROD was expected to be signed on September 4, however if EPA's comments were received prior to the signing, FAA would consider them.

As agreed to, we have considered your comments and offer the following response. The WR/ROD has been signed today.

EPA Comment: "We encourage FAA to continue to conduct meaningful engagement of stakeholders, particularly communities that are in close proximity to the airport that are likely to be most affected by the proposed action. Please continue to ensure that community members are aware of the proposed changes and have the opportunity to review and provide comment as appropriate. "

FAA Response: The Cargo City Reconfiguration Plan was developed after extensive coordination with Tincum Township and the community affected. The WR/ROD was also made available for public comment during the 30-day review period. The Cargo City Reconfiguration Plan will eliminate any residential acquisitions; significantly reduce the number of businesses that will need to be relocated; and lessens County and Township tax revenue loses. Communities in Tincum Township have indicated they fully support this modification and are anxious for FAA's

approval. The airport continues to work with surrounding communities as CEP progresses.

EPA Comment: "The Environmental Justice analysis presented in the re-evaluation states that the FEIS concluded that the PHL CEP will not have a significant adverse impact or disproportionate impacts to minority or low-income populations. Please consider whether the EJ analysis could be updated using more recently available data than was used in the FEIS in order to support this conclusion, possibly utilizing 2010 Census data. We continue to urge FAA to improve the EJ analysis and EPA reiterates comments and suggestions previously made regarding the EJ analysis for this project."

FAA Response: As stated in the EIS, there were no significant adverse impacts or disproportionate impacts to Environmental Justice Communities. The Cargo City Reconfiguration Plan eliminates residential acquisitions and any noise related or other impacts remain essentially the same or wholly on the airport. While using 2010 Census data may result in a change in classifications for communities surrounding the airport, because there are no or less impacts associated the Cargo City Reconfiguration Plan the finding of no significant or disproportionate impacts to Environmental Justice Communities would remain.

EPA Comment: "Please be aware that on December 18, 2014, the Council on Environmental Quality released revised draft guidance for public comment that describes how Federal departments and agencies should consider the effects of greenhouse gas emissions and climate change in their National Environmental Policy Act reviews. The revised draft guidance supersedes the draft greenhouse gas and climate change guidance released by CEQ in February 2010. This guidance on explains that agencies should consider both the potential effects of a proposed action on climate change, as indicated by its estimated greenhouse gas emissions, and the implications of climate change for the environmental effects of a proposed action.

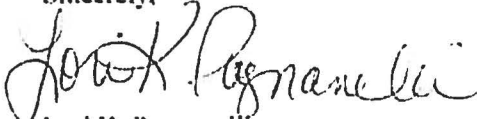
*"CEQ recognizes that many agency NEPA analyses to date have concluded that GHG emissions from an individual agency action will have small, if any, potential climate change effects. Government action occurs incrementally, program-by-program and step-by-step, and climate impacts are not attributable to any single action, but are exacerbated by a series of smaller decisions, including decisions made by the government. Therefore, the statement that emission from a government action or approval represents only a small fraction of global emissions is more a statement about the nature of climate change challenge, and is not an appropriate basis for deciding whether to consider climate impacts under NEPA. Moreover, these comparisons are not an appropriate method for characterizing the potential impacts associated with a proposed action and its alternatives and mitigations."*

The revised draft guidance suggests that, if an agency determines that evaluating the effects of GHG emissions would not be useful in the decision making process and to the public to distinguish between the proposed action, alternatives and mitigations, the agency should document the rationale for that determination. FAA should ensure that the discussion of climate change in the PHL CEP is consistent with this recent guidance. This guidance is available in full at:  
[http://www.whitehouse.gov/sites/default/files/docs/nepa\\_revised\\_draft\\_ghg\\_guidance\\_searchable.pdf](http://www.whitehouse.gov/sites/default/files/docs/nepa_revised_draft_ghg_guidance_searchable.pdf)

FAA Response: The FAA considered greenhouse gas emissions in the WR/RDO and determined that greenhouse gas (GHG) analysis would not be useful in the decision making process to the public to distinguish between the proposed action, alternatives and mitigations because the proposed changes to the project, consisted of swapping the location of facilities and modifying the construction schedule. This change would have a minimal effect on GHG emissions. Construction years for peak emissions would differ from what was presented in the EIS, but total annual and cumulative construction emissions would be lower. Aircraft and truck operational emissions would also be lower, due to shorter taxiway routes and shorter access to I-95. The FAA concluded that the Cargo City Reconfiguration Plan would not change the outcome of the General Conformity Determination nor would it cause a delay in meeting the Philadelphia attainment goals.

We appreciate your input, and if EPA has any further comments or concerns, we would be happy to consider them on future projects. Should you have any questions, please contact me or Sue McDonald at (717) 730-2841. Thank you.

Sincerely,



Lori K. Pagnanelli  
Manager