

APPENDIX K
*Public Comments and
Response to Comments*

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K.1 INTRODUCTION

This appendix contains a list of 23 substantive comment submissions received concerning the Draft Environmental Assessment (EA) during the 45-day comment period between February 22, 2022 and April 7, 2022 and the responses to those comments.

Following this introduction, **Section K.2** provides a list of commenters grouped by agencies, organizations, and the general public. Within the groupings, commenters are organized in alphabetical order.

Section K.3 contains copies of comments received during the comment period and responses to those comments. Commenters provided these comments in oral, written, and electronic formats. FAA solicited comments through public notices and collected orally at the virtual public hearing (March 23, 2022) and in-person public hearing (March 26, 2022); in writing via U/S/ mail comment submissions, electronically at the speakupaustin.org website; and electronically via email. Each written comment is presented as it was received by the FAA and any misspellings have not been corrected. Each written comment is numbered in the margin of the comment letter, website submission, or the comments taken from the public hearings, and the responses to all the comments follow that comment letter, website submission, or comments taken from the public hearings. Following each comment submission, responses to each of the comments are provided.

Section K.4 is the memorandum to the Mayor and City Council dated July 13, 2021 regarding the Airport Expansion and Development Program Update.

K.2 LIST OF COMMENTERS

**TABLE 2-1
LIST OF COMMENTERS**

Commenter Number	Name	Affiliation	Date	Submission Type
Agency				
A-1	Ryan Vise	Texas Commission on Environmental Quality	3/4/2022	E-mail
Organization				
O-1	Paul DiFiore	People Organized in Defense of Earth and her Resources	4/6/2022	E-mail
O-2	Andrew Hoekzema	Capital Area Council of Governments	3/2/2022	E-mail
O-3	Jeff Pearse	Lonestar Airport Holdings, LCC.	4/7/2022	Website
Public				
P-1	Anonymous		3/13/2022	Website
P-2	Bobs		4/7/2022	Website
P-3	Brandon		3/21/2022	Website
P-4	Edgar		3/11/2022	Website
P-5	Bertha Rendo Delgado		3/26/2022	Public Meeting comment
P-6	Jo Hamiltin		3/31/2022	Website
P-7	Susan Pantell		4/1/2022	Email
P-8	Alex S		3/16/2022	Website
P-9	Alex S		3/16/2022	Website
P-10	Alex S		3/16/2022	Website
P-11	Alex S		3/16/2022	Website
P-12	Alex S		3/16/2022	Website
P-13	Alex S		3/16/2022	Website
P-14	Rita Ann Supeda Soiz		3/26/2022	Public Meeting Comment
P-15	SouthAustinRules		4/7/2022	Website
P-16	SouthAustinRules		4/7/2022	Website
P-17	SouthAustinRules		4/7/2022	Website
P-18	Triguy		3/1/2022	Website
P-19	Howard Yancy		2/23/202	Website

Sources: RS&H, 2022.

K.3 COMMENTS AND RESPONSES TO COMMENTS ON THE DRAFT EA

Commenter A-1

Ryan Vise

Texas Commission on Environmental Quality

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 4, 2022

Kane Carpenter P.G.
Environmental Manager
City of Austin Department of Aviation
3600 Presidential Blvd., Ste. 411
Austin, TX 78719

Via: **E-mail**

Re: **TCEQ NEPA Request #2022-022. Austin-Bergstrom International Airport (AUS) Expansion and Development Program. Travis County.**

Dear Mr. Carpenter,

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments:

In accordance with the general conformity regulations in 40 CFR Part 93, this proposed action was reviewed for air quality impact. The proposed action is located in Travis County, which is currently designated as attainment/unclassified for the National Ambient Air Quality Standards for all six criteria air pollutants. General conformity requirements do not apply.

1

The Office of Water does not anticipate significant long term environmental impacts from this project as long as construction and waste disposal activities associated with it are completed in accordance with applicable local, state, and federal environmental permits, statutes, and regulations. We recommend that the applicant take necessary steps to ensure that best management practices are used to control runoff from construction sites to prevent detrimental impact to surface and ground water.

2

Any debris or waste disposal should be at an appropriately authorized disposal facility.

3

Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA coordinator at (512) 239-2619 or NEPA@tceq.texas.gov

Sincerely,

Ryan Vise,
Division Director
External Relations

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-0010 • tceq.texas.gov

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Response to Commenter A-1

1. Comment noted.
2. As described in **Section 3.14.3.5.2**, Best Management Practices (BMPs) would be defined in the Airport's Stormwater Pollution Prevention Plan (SWPPP) and be implemented on construction sites, and the Proposed Project would not result in any adverse effects to surface waters. Furthermore, as described in **Section 3.14.4.5.2**, by obtaining any required permits associated with dewatering activities, no significant impacts to groundwater would occur as a result of the Proposed Project.
3. As stated in **Section 3.8.5.2**, any hazardous waste generated during construction and operation would be managed and disposed of in compliance with federal, state, and local hazardous materials guidelines. Solid debris and waste generated would be disposed of at the Texas Disposal Systems Landfill. The increase in solid waste generated by the Airport would not be a significant impact, given the capacity of the landfill.

Commenter O-1
Paul DiFiore
People Organized in Defense of Earth and her Resources



People Organized in Defense of Earth and her Resources

Austin-Bergstrom International Airport
 ATTN: Environmental Affairs
 2760 Spirit of Texas Drive, Austin, TX 78719

To whom it may concern:

PODER is an organization that has been fighting for environmental and social justice in east Austin for thirty years. In 2021 we launched the Colorado River Conservancy project: a grassroots-led network with the mission to protect, restore, and preserve the wild and scenic stretch of the river east of Longhorn Dam, as well as to advocate for a community-centric vision for the future of the river corridor. We have stood and continue to stand in solidarity with residents living in the neighborhoods surrounding the Austin-Bergstrom International Airport (which is, crucially, located east of Austin no more than a mile from the Colorado River) and we write to today to record several key flaws in the airport’s Environmental Assessment for its planned expansion. The assessment’s repeated claims that the project will have “no significant impact” beggar belief and makes the airport’s consequent claims that “no mitigation is required” equally incredible.

First, it must be stated that this process was carried out under outdated and harmful regulations. In the summer of 2020, the Trump administration revised guidelines to federal agencies under the National Environmental Policy Act, or NEPA, which for decades had mandated thorough review processes. Several key elements were weakened or rolled back, and as a result, agencies like the Federal Aviation Administration (FAA) could consider fewer impacts when assessing projects like the ABIA airport expansion. This was conveniently time for ABIA, and extremely unfortunate for residents of our city. However, in October of 2021, the Biden administration announced that they would be reversing Trump’s roll backs of NEPA regulations, reinstating the old, stronger rules, and perhaps even enhancing them more via further rulemaking in the future. Sadly, once the airport’s Environmental Assessment is finalized, it will be “locked in” under the now-outdated regulations.

1

Additionally, the assessment takes an extremely narrow view of “impact,” blindly ignoring years of cumulative impacts resulting from structural environmental racism in the urban development of Austin. It comes to its conclusions via often absurd logic and appears to conveniently find answers that would allow the project to move forward with no mitigation in every case. To give just one example: the assessment recognizes that the population in the general study area of its project meets the criteria of “environmental justice populations” (3.13.3.2). To have an impact on those populations, it would have to have a disproportionate impact on them relative to other populations. However, according to the assessment, “no significant impacts would occur” *at all* because of the project, so it is of course impossible for disproportionate impacts to occur for environmental justice populations (3.13.3.5.2). This simply demonstrates blindness to history and to the reality on the ground.

2

Finally, regardless of how accurately the process was followed, the outcome remains unsatisfactory from a community perspective. The airport is not only a member of its neighborhood, of greater Austin and of society at large, it is a publicly run institution with substantial public responsibility. If airport staff and consultants go through a box-checking exercise, pass with flying colors, yet the people are wronged, then the boxes must be changed. In this case, FAA policies should be reformed. Failing that, the airport should consider voluntarily raising the bar for itself, not because it is required to do so, but because it ought to do right by the community. Thank you for your consideration and for the opportunity to provide these comments.

3

Sincerely,
 Paul M. DiFiore
 Colorado River Conservancy Project Manager
 PODER P.O. Box 6237 Austin, TX 78762 512/770-7896 email: poder.austin@gmail.com

Response to Commenter O-1

1. Amended CEQ regulations were released in July 2020 and subsequently placed under review in January 2021 until April 2022. This project's NEPA process began in October 2021 and therefore uses the 2020 regulations. The revised regulations stated that they applied to any NEPA process begun after September 14, 2020. See Revised 40 C.F.R. §1506.13.
2. As stated in Section 3.13.3.4, the methodology used for assessing impacts to environmental justice populations followed the guidance provided by the U.S. Environmental Protection Agency. The commenter is correct in noting that no significant impacts would occur as a result of the Proposed Project compared to the No Action Alternative and that no disproportionately high and adverse effects to environmental justice populations would occur. Also, as stated in Section 3.13.3.5.1, the No Action Alternative also would not result in any impacts to environmental justice populations.
3. The commenter's suggestion that FAA policies should be reformed is acknowledged. The EA has been prepared in compliance with all existing FAA policies and regulations.

Commenter O-2
Andrew Hoekzema
Capital Area Council of Governments

From: Hoekzema, Andrew <ahoekzema@capcog.org>
Sent: Wednesday, March 2, 2022 11:43 AM
To: Romero, Phoebe <Phoebe.Romero@austintexas.gov>; Heggelund, Christiane <calepuz@capcog.org>; Carpenter, Kane <Kane.Carpenter@austintexas.gov>
Subject: RE: Opportunity for public comment on airport environmental assessment

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Phoebe and Kane:

I have a few preliminary questions/notes about the air quality report:

*Starting with table 22, there are NO2 emissions listed, but not NOX emissions, even though the footnote talks about NOX emissions. Since NOX includes NO + NO2 + HONO, I was wondering if the NO2 was a typo or if those numbers actually represent NO2 emissions only. If it's the latter, I would suggest presenting the NOX emissions rather than the NO2 emissions.

1

As noted in the report, the amount of NOX emissions exceeds the significance level, but while there is a reference in the report to ABIA taking mitigation measures, they are not enumerated: "AUS is committed to mitigation measures that were not included in the analysis which will further reduce emissions for 2032. These measures will be further developed by AUS."

2

Among some suggestions for strategies/measures that ABIA might wish to consider for mitigating the expected increase in NOX emissions:

- 1) Avoid construction activities prior to noon on O₃ Action Days (or entirely)
- 2) Require or incentivize use of Tier IV equipment for construction activities (consider require reporting of equipment use as well for accountability)
- 3) Replacement of all diesel ground support equipment that does not meet Tier IV standards, using electric models where available
- 4) Further reductions in emissions from APUs to the extent feasible/practicable
- 5) Enact and enforce idling restrictions for use of all engines – non-road or on-road – at the airport
- 6) Sponsor offsetting emissions reductions elsewhere within Austin or from indirect sources (for example, helping pay for replacement of older City of Austin fleet vehicles or offering free CapMetro fares to/from the airport)

3

Andrew Hoekzema
Director of Regional Planning and Services
Capital Area Council of Governments (CAPCOG)
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Response to Commenter O-2

1. The commenter is correct in noting that estimated construction and operational emissions should be reported as nitrogen oxides (NO_x). As a result, Tables 3.4-1 through 3.4-8 are revised to identify the pollutant as NO_x.
2. AUS is committed to mitigating emissions from construction and operational emissions including aircraft for all criteria pollutants. See Section 3.4.6 for information on these air quality mitigation measures.
3. The commenter's suggested mitigation measures will be considered by AUS for implementation during construction and operation of the Proposed Project.

Commenter O-3
Jeff Pearse
Lonestar

Austin-Bergstrom International Airport
2716 Spirit of Texas Drive
Austin, Texas 78719
ATTN: Environmental Affairs Division



Re: Draft Environmental Assessment
Airport Expansion and Development Program
Austin-Bergstrom International Airport
Austin, Texas
February 2022

April 7, 2022

Dear: City of Austin Advisory Commission and U. S. Department of Transportation Federal Aviation Administration

We respectfully request that you consider the following concerns and comments provided upon our review of the draft Environmental Assessment (EA) prepared pursuant to National Environmental Policy Act (NEPA) for airport development actions outlined below.

General Comments

1. The Environmental Assessment (EA) is a lengthy document and would benefit from an Executive Summary. To reduce the overall size of the document to comply with revised Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations, the Federal Aviation Administration (FAA) should consider placing tables and/or Exhibits in an Appendix.

1

2. Chapter 7 of the FAA Order 5050.4B 700. THE ENVIRONMENTAL ASSESSMENT (EA). CEQ states that an EA is a "concise document" that takes a "hard look" at expected environmental effects of a proposed action. Section 1501.5 of the CEQ NEPA regulations state that the text of an environmental assessment shall be no more than 75 pages, not including appendices, unless a senior agency official approves in writing an assessment to exceeds 75 pages and establishes a new page limit.

2

3. The EA needs to identify any permits, licenses, other approvals, or reviews that apply (see "FAA Order 1050.1F, Paragraph 6-1.a (4)").
https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050_1F.pdf

3

Chapter 1 Purpose and Need

1. Section 1.2 Background should reference that there is an existing South Terminal Lease and Concession Agreement executed on March 24, 2016, between the City of Austin Department of Aviation (DOA), owner of the Austin-Bergstrom International Airport (ABIA), and Highstar Capital IV, LP, tenant, to operate the South Terminal as a Limited Services Terminal. Highstar Capital IV, LP holds a 30-year lease and concession agreement. The Airport covers about 4,242 acres and the area within the lease boundary is about 22.66 acres. The South Terminal is located at 10000 Logistics Lane Austin, Travis County, Texas. Highstar Capital IV, LP completed NEPA Categorical Exclusion (CATEX) Documentation on November 8, 2016, for Rehabilitation and Reconstruction of the South Terminal. The rehabilitation and reconstruction of the South Terminal allowed for additional flights and carriers to move into the Barbara Jordan Terminal and provide AIBA customers with additional opportunities for competitive rates from ultra-low-cost air carriers.

4

2. The EA should describe the South Terminal consisting of a three (3) gate terminal, passenger airline aircraft parking area, automobile parking lots, paved driveways, Transport Network

5

1



<p>Company parking, parking booth, security booth, and reference to South Terminal as the former Bergstrom Air Force Base (AFB) area.</p>	<p>5</p>
<p>3. Section 1.2.2.1 Existing Runways includes reference to Runways 18L-36R and 18R-36L which should be referenced and labeled as Runways 18L/36R and 18R/36L and as such on Exhibit 1-2. Exhibit 1-2 should also label Barbara Jordan Terminal (BJT) to clearly differentiate from the South Terminal.</p>	<p>6</p>
<p>4. It should also be clarified in Section 1.2.2.2 Existing Passenger Terminal Buildings that the South Terminal and its parking lots and aircraft parking areas are a separate business with a long-term ground lease. Within that ground lease other businesses than the operation of the South Terminal is present, such as airlines, food and beverage concessionaire, and a ground handling vendor among others. As the South Terminal is a business with employees separate from those at the Barbara Jordan Terminal (BJT), the lease conditions should be described as part of the baseline Affected Environment for evaluating the socioeconomic impacts.</p>	<p>7</p>
<p>5. There is other parking at the South Terminal that should be shown on Exhibit 1-5.</p>	<p>8</p>
<p>6. Table 1-3 should show the percentage growth in historic and forecast aircraft operations at ABIA, and Table 1-4 should show the percentage change in Historic Passenger Enplanements at the airport.</p>	<p>9</p>
<p>7. The demand illustrated in Exhibit 1-7 appears low and should be checked for consistency with ABIA planning and financial calculations.</p>	<p>10</p>
<p>8. Is it three (3) needs or four (4) needs that the proposed project is seeking to address, as identified in Section 1.3.2? Text is confusing.</p>	<p>11</p>
<p>9. Table 1-5 provides an overview of the ability of the functional components of the existing terminal to accommodate the forecast increase in passengers. Further reference is made to the existing terminals at the AUS have 37 aircraft gates – accounting for 34 gates at BJT and 3 gates at South Terminal, but Table 1-5 fails to differentiate the Existing (2019) nor Future (2027) terminal components meeting existing and future standards.</p>	<p>12</p>
<p>10. Page 1-17 of the EA in Section 1.3.2.1 Insufficient Passenger Processing Facilities and Gates references that a total of 57 gates are needed. Does this assessment account for the three (3) gates at the South Terminal.</p>	<p>13</p>
<p>11. The EA states in Section 1.3.3 that one of the purposes of the proposed action is to “maintain efficient access between the east and west airfields.” The EA does not explain why relocation of Taxiways H and J (Project A-1) is needed to main such access, please explain. Relocation of these taxiways does not appear in the “Preferred 2037 Terminal Alternative” identified in Chapter 5 of the “City of Austin, Austin-Bergstrom International Airport 2040 Master Plan, 2019. Available at: https://www.austintexas.gov/department/aus-master-plan.” There appears to be two (2) new taxi lanes between the runways replacing the old taxiways. Can you please provide details on the need the capacity of two new cross taxiways and perform TAM modelling with the proposed flight forecasts and show the difference in delay on the airfield if there was only one new cross field taxiway.</p>	<p>14</p>
<p>12. The EA states in Section 1.4 that the proposed project includes 34 projects components, but the subsequent sections (1.4.1 Facility Demolition projects, 1.4.2 Airfield Projects, 1.4.3 Terminal Projects, 1.4.4 Roadways Projects, 1.4.5 Support Projects, and 1.4.6 Utilities and Infrastructure Projects equate to 32 project components, as well as listed in Table 1-7.</p>	<p>15</p>

<p>13. The listing of Facility Demolition Projects in Section 1.4.1 demonstrates that the project is not a concourse project - it is a head house and concourse project. The project description should be revised accordingly. Project D-2 in this section should also include demolition of the South Terminal parking lots.</p>	<p>16</p>
<p>14. In Section 1.4.3, description of Project T-4 is missing text. Project T-5 is a description of a terminal project and should be described as such, rather than construction of a concourse.</p>	<p>17</p>
<p>15. The EA should include the proposed/future Airport Layout Plan that shows Project T-7: Construction of BJT West Concourse Gate Expansion with the number of gates shown, indicating the total number of gates on the concourse before the expansion, the total number afterwards and the net addition.</p>	<p>18</p>
<p>16. In Section 1.4.5, construction lay down south of the two cross taxiways that begin the project appear to be unnecessary and unlikely to be as large as the area shown on the drawings for Project S-5. As there will be cross-field aircraft movement areas between the BJT project and the proposed lay down area, can you show the intended haul route for staff and materials between the lay down area and the project site.</p>	<p>19</p>
<p>17. In Table 1-7, AIP and PFS in footnote /c/ should be defined.</p>	<p>20</p>
<p>18. In Table 1-7, is the South Terminal demolition eligible for Airport Improvement Program (AIP) or passenger facility charge (PFC) funding?</p>	<p>21</p>
<p>19. In Table 1-7, A-1: Relocation of Taxiways J and J should read Project A-1: Relocation of Taxiways H and J.</p>	<p>22</p>

Chapter 2 Alternatives

<p>1. Section 2.2 needs to explain the background on the development of alternatives and the process which resulted in the identification of potential alternatives that are discussed in Section 2.2. This needs to include an explanation of the formulation of alternatives after development of the 2040 Master Plan, including any Final Master Plan that may have been prepared after the Draft Master Plan, dated 2018 and posted on the City of Austin website and referenced in the EA. We note that Chapter 5 of the EA references a date of 2019 for the Master Plan, but the link provided in the reference is to a website which posts the Draft December 2018 Master Plan. If there is a 2019 version of the Master Plan, it should be accurately referenced and available for the public to review in providing comments on the EA. If so, the comment period on the EA should be extended so the public can review the Final Master Plan, if that was used in formulating alternatives that are identified as potential alternatives in Chapter 2 of the EA, and offer comments on the EA.</p>	<p>23</p>
<p>2. Section 2.2 of the EA states that "The following potential alternatives were included in the Master Plan and are evaluated in this EA", but the EA does not include Alternative 4, as modified, in the 2040 Master Plan developed by Landrum & Brown for the ABIA, nor does it identify or evaluate (screen) Alternative 5 - New South Terminal with Satellite Concourse as an alternative that was considered by ABIA. The EA should be revised to include a discussion of all five (5) alternatives evaluated in the 2040 Master Plan. We note that FAA Order 1050.1F, Paragraph 7-1.1(e), although specific to an Environmental Impact Statement (EIS), states that "The FAA may include alternatives proposed by the public or another agency. However, they must meet the basic criteria for any alternative: it must be reasonable, feasible, and achieve the project's purpose." Alternative 4 as identified in the 2040 Master Plan appears to be reasonable, feasible and could achieve the project's purpose.</p>	<p>24</p>

<p>3. We have provided three (3) viable alternatives that should have been evaluated in the Alternative Analysis for additional consideration and review by the ABIA:</p> <ul style="list-style-type: none"> a. Alternative A: Relocated South Terminal on the south end of the airport as shown on the attached Proposed Project Figure. b. Alternative B: Alternative 4 amended to fit two (2) cross taxiways and one taxi lane south of the satellite concourse. c. Alternative C: A realigned taxiways H and J south of the South Terminal as shown on the attached Alternative C Figure, so there is no impact on the South Terminal. Taxiways H and J would transverse what is referred to as the 'maintenance ramp', which is north of the South Terminal. it would be quite like the plan shown on the Airport's website under AEDP. (which is inconsistent with the number of gates shown in the EA) https://www.austintexas.gov/aedp. Phase 1 of the could be built and not impact the South Terminal 	25
<p>4. Chapter 5, Section 504. KEY MASTER PLAN STEPS THAT AID THE NEPA PROCESS of the FAA Order 5050.4B relative to airport planning and NEPA should be considered during the NEPA process When developing reasonable alternatives for NEPA purposes, the scope of alternatives must include the alternatives noted above and those reasonable alternatives outside the airport sponsor's and FAA's jurisdiction (40 CFR 1502.14(c). Consequently, "...include those [alternatives] that are practical or feasible ways from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant.</p>	26
<p>5. The 2040 Master Plan, referenced in Chapter 1, recommended Alternative 4 – not the same Alternative 4 identified in the EA – as the "Preferred Alternative" of the five (5) alternatives evaluated in the Master Plan. As noted in Chapter 5 of the 2040 Master Plan "Thirty-two (32) ADG-III gates would be developed on the new Midfield Concourse. Twenty-nine (29) ADG-III would be accommodated on the existing BJT, and five (5) ADG-V gates would be accommodated on the east side of the BJT, for a total of 34 gates on the existing BJT. Approximately 87 RON parking positions could be accommodated on the existing BJT aprons and new aprons to the south and east of the Midfield Concourse if necessary. Some of these RON positions can be used for a central deicing operation." Alternative 4, as modified in the 2040 Master Plan and identified as Preferred 2037 Terminal Alternative, does not show in Exhibit 5.3-6 the demolition of the South Terminal or the relocation of Taxiways H and J to that area. The 2040 Master Plan Implementation Plan does call for a new ADG-V midfield taxiway to be located south of the existing South Terminal and connect to Taxiways B and C. In view of what is stated in the Master Plan, the EA should explain the need for relocating Taxiways H and J to the area shown on Exhibit 2-4, which appears to be the only reason for demolition of the South Terminal in view of what is presented for the Preferred Alternative in the Master Plan.</p>	27
<p>6. Section 2.2 makes the statement on page 2-7 that "... it was assumed that the number of departures from the South Terminal would be 18 per day, which is the number of departures authorized in the agreement between the City and the operator of the South Terminal." This statement is incorrect.</p>	28
<p>7. For Alternative 1, the reason the ticketing/check-in space cannot accommodate future traffic under this alternative is that these facilities were not proposed to be expanded, as they are in Alternatives 3 and 4. Please explain why the deficiencies in the terminal processor was address in Alternatives 3 and 4 but was not addressed in Alternatives 1 and 2. This alternate has been eliminated based on the terminal layout, but the preferred terminal layout could be used with the concourse configuration, which would mean it would not be eliminated in screening of alternatives.</p>	29

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| 8. For Alternative 2, explain the reason for the team deciding not to expand the head house for processing capacity under this alternative, yet a decision to expand the head house was made for the Preferred Alternative identified in the EA. | 30 |
| 9. Alternate 1, 2 and 3 – why do these alternatives have a significantly larger number of gates (64+ compared with 57) than alternative 4, the preferred alternative? | 31 |
| 10. For Alternative 3, address the demolition of the south terminal and associated facilities if the cross-field taxiways remain on their current alignment. | 32 |
| 11. Alternative 4 includes no discussion of demolition of the South Terminal, which is a significant socioeconomic and potentially Environmental Justice impact. The alternative should be revised so that the South Terminal is not impacted, or the ABIA and FAA should identify mitigation either in the EA or as part of an EIS. | 33 |

Chapter 3 Affected Environment and Environmental Consequences

Section 3.1 Introduction

<p>Other projects with a similar timeframe as projects identified in the Airport Expansion and Development Program EA are listed in the 2040 Master Plan Implementation Plan, dated 2018. It is not clear if those projects were included in the Affected Environment discussion and baseline for analysis of the Proposed Action construction and 2027 operational year impacts. The updated timeline for those projects should be discussed as part of the Affected Environment section, which should list all projects which are not part of the Proposed Action, but which would be completed within the same timeframe as the Proposed Action. The impacts of those projects need to be reflected in the Affected Environment section for a complete and accurate analysis of the Environmental Consequences of the Proposed Action. If any of those projects will be constructed within the same timeframe as projects identified under the Proposed Action, the analysis of construction impacts needs to be revised to consider the combined effects of both construction of the projects identified in the Proposed Action and construction of those other projects to be constructed at the same timeframe.</p>	34
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Section 3.2 Study Areas

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| <p>1. Section 3.2 Study Areas. Based on FAA Order 1050.1F Desk Reference, “[t]he study area varies based on the impact category being analyzed,” However, the EA uses a Project Study Area and a General Study Area(s) for assessing impacts. For community impacts (e.g., socioeconomic, environmental justice), the Project Study Area is too small and the General Study Area too large to assess direct impacts on the Environmental Justice population, for example. We note that the 2040 Master Plan, which evaluated impacts of alternatives that are similar in nature to alternatives evaluated in the EA, used a study area for community impacts (demographics (population, including minority and low-income areas) socioeconomic conditions and community resources) “. . . which was developed based on the 0.5-mile buffer from the 65 dB noise contour line identified by the COA as AO-3, in addition to adjacent residential subdivisions and neighborhoods.”</p> | 35 |
| <p>2. Section 3.2 defines the Project Study Area and General Study Area. The associated Exhibit 3.2-1 refers to the Project Study Area as the “Detailed Study Area” in the legend, but Project Study Area in the title block.</p> | 36 |

<p>3. For the General Study area related to noise and vibration, air quality, and surface traffic, identification of haul routes or potential haul routes should be included. Figures depicting both the General Study area and the Proposed Action(s) should include identification of streets and highways.</p>	<p>37</p>
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Section 3.4 Air Quality

<p>1. FAA Order 1050.1F, Desk Reference, Paragraph 1.1.1 Permits note that a list of all required permits and licenses should be included in a NEPA document along with an indication of their issuance date. For additional information on the EPA's Air Permit Programs, see the EPA's Air Quality Planning and Standards, Air Permit Programs website at: http://www.epa.gov/airquality/permjimp.html. Please include a list of all required permits and licenses along with an indication of their issuance date.</p>	<p>38</p>
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<p>2. Section 3.4 Air Quality. Air quality is a section that many stakeholders will be interested in understanding. Because information relies heavily on models and the use of equipment, it would be strongly recommended to provide a list of equipment anticipated, how many pieces of equipment, and the anticipated timing of use. This information may have been input into the models, but it is difficult to understand simply by looking at the model output. Strongly recommend providing this information in the analysis in a summary that could be understood by a layperson.</p>	<p>39</p>
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<p>3. The discussion of construction emissions is confusing and does not support the conclusion. Table 3.4-3 shows construction emissions resulting from construction. There is a significant increase in criteria pollutants beginning in 2023 through 2029 with no explanation of what this means in terms of significance. More information is necessary to explain why this increase does not impact air quality.</p>	<p>40</p>
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<p>4. Will there be stationary sources that would require permits to construct and permits to operate? Will there be new sources of emergency power supply?</p>	<p>41</p>
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<p>5. Ambient air conditions are in Appendix C but there is no reference so the reader can find this information. Key to being able to understand any air quality changes could occur.</p>	<p>42</p>
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<p>6. Table C-1 (minus the California standards) is typically included in the section to identify ambient standards. No reference to this in the section.</p>	<p>43</p>
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Section 3.5 Biological Resources

<p>1. Section 3.5.2.1 states "The vegetation within the Project Study Area is predominantly maintained grasslands dominated by Bermudagrass, KR bluestem, and Johnsongrass." Typical technical reports would also provide the Latin scientific species name to avoid confusion of non-standard common names.</p>	<p>44</p>
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<p>2. Section 3.5.2.1 state "Maintained grasslands within the Project Study Area additionally contain native wildflowers and grasses, including milkweed." Again, Latin scientific name(s) of milkweed species would be helpful, particularly because native milkweed species are a primary component of monarch butterfly (<i>Danaus plexippus</i>) habitat, which is currently a candidate for federal listing as threatened or endangered. Further, Table 3.5-1 indicates that monarch butterfly habitat occurs within the Project Study Area and General Study Area.</p>	<p>45</p>
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<p>3. Section 3.5.2.1 states "The Project Study Area is within the USFWS Bird Conservation Area 21, Oaks and Prairies. This Conservation Area lists birds of conservation concern (BCC) that use</p>	<p>46</p>
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<p>habitat in the area.” The citation provided refers to the USFWS Migratory Bird Program and provides a URL for the citation (https://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php). However, Bird Conservation Areas (including Area 21) are a geographic designation developed by the U.S. North American Bird Conservation Initiative (NABCI), not USFWS. The NABCI Committee is a forum of government agencies, private organizations, and bird initiatives helping partners across the continent meet their common bird conservation objectives. Additionally, the cited URL does not appear to exist, thus verifying the cited information is not possible. Further, the NABCI website (https://nabci-us.org/resources/bird-conservation-regions-map/#bcr21) provides a brief description of the Conservation Areas, but then links to another website for the Oaks and Prairies Joint Venture, which describes the Conservation Area and BCCs, but does not specifically “list BCCs that use habitat in the area”, as stated in the text. (http://www.opjv.org/)</p>	<p>46</p>
<p>4. Overall, Section 3.5.2.2 is poorly written and confusing. Section 3.5.2.2 states “U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) identified 14 federally listed or proposed threatened, endangered, or candidate species with the potential to occur in the General Study Area.” However, the IPaC report provided in Appendix F only evaluated the Project Study Area and did not include the General Study Area. Later in that same paragraph it states “USFWS’s IPaC did not identify critical habitats located within the Project Study Area” but makes no other reference to critical habitats within the General Study Area until later in the text. The 14 referenced species are not identified or described in the text, but they are included in the IPaC report as species of potential occurrence/impact within the Project Study Area.</p>	<p>47</p>
<p>5. Section 3.5.2.2 states “Habitat for four federally listed species is within the General Study Area.” However, Table 3.5-1 only indicates habitat for one federally listed species (whooping crane) occurs in the General Study Area. The remaining species with habitat in the General Study Area are Proposed for federal listing; Candidates for federal listing; state-listed threatened or endangered; or are SGCN species. Also, the IPaC report only looked at the Project Study Area, so determinations of habitat within the General Study Area are unclear.</p>	<p>48</p>
<p>6. Section 3.5.2.2 states “The Whooping Crane (<i>Grus americana</i>, endangered) has potential stopover habitat within the Project Study Area.” However, Table 3.5-1 only indicates “stopover habitat in the General Study Area.”</p>	<p>49</p>
<p>7. Exhibit 3.5-1 refers to the Project Study Area as the “Detailed Study Area” in the legend.</p>	<p>50</p>
<p>8. Section 3.5.5.2 states “Removal of grassland vegetation for the Proposed Project would remove milkweed and would have an effect on Monarch Butterfly habitat, which could impede species behaviors such as feeding and reproduction. Grassland clearing activity has the potential to kill or harm butterflies or larvae using the habitat. Therefore, the Proposed Project may adversely affect the Monarch Butterfly. The Monarch Butterfly is a candidate species that is expected to be proposed for listing in 2024,¹⁴ and no consultation with USFWS is required at this time.” Section 3.5.3 states “FAA Order 1050.1F, Exhibit 4-1, provides the FAA’s significance threshold for biological resources. This order states that a significant impact would occur if “the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service determines that the action would be likely to jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat.” No significance threshold has been developed for non-listed species.” However, due to the pending listing status in 2024 and the Concourse B construction timeline, paired with concern for the species across the U.S., and required clearing of monarch habitat associated with the proposed project, further evaluation of the alternatives and compliance with FAA Order 1050.1F is recommended.</p>	<p>51</p>

9. Appendix E – TPWD Request for Comment Letter also recommends “incorporating pollinator conservation and management into the revegetation and maintenance plan for this project, such as promoting growth of native flowering species throughout the growing season. TPWD recommends revegetation efforts include planting or seeding native milkweed (*Asclepias* spp.) and nectar plants as funding and seed availability allow. Information about monarch biology, migration, and butterfly gardening can be found on the Monarch Watch website.” 52

10. There is no mention of impacts to migratory bird species, or Migratory Bird Treaty Act (MBTA) compliance, in Section 3.5. Typical impact analyses include assessments of potential nesting habitat; temporal phasing of the construction activities and migratory bird impact avoidance measures; onsite staff training for MBTA compliance; nest monitoring; etc. Appendix E – TPWD Request for Comment Letter recommends excluding vegetation clearing activities during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If clearing vegetation during the migratory bird nesting season is unavoidable, TPWD recommends surveying the area proposed for disturbance to ensure that no nests with eggs or young will be disturbed by operations. 53

11. Section 3.5 also does not discuss general non-T&E wildlife concerns, such as wildlife aircraft impact avoidance planning; wildlife displacement due to airport expansion; or wildlife behavioral changes due to construction activities. Presumably the airport has a bird air strike hazard plan and general wildlife management plan, but there was no mention of these planning documents or consideration of how they may be affected by the Proposed Action. 54

3.6 Climate

1. FAA Order 1050.1F requires the evaluation of climate impacts to be provided separately from air quality impacts. The document does provide a separate discussion and analysis of potential climate impacts separate and uses the Motor Vehicle Emission Simulator (MOVES) and other emissions models to determine potential exceedances. FAA does not currently identify significance thresholds, but the City of Austin does have a Climate Equity Plan <https://www.austintexas.gov/page/austin-climate-equity-plan> that all City projects must comply with, and this is not discussed in the Affected Environment section. The Climate Equity Plan is mentioned in Appendix C, but the Plan is not summarized and there is no discussion of how the Plan applies to the Project. 55

2. The FAA Order 1050.1F indicates that the Affected Environment discussion should include a concise description of the current level of preparedness in the study area with respect to climate change. A discussion of the current climate issues related to Travis County are not included. For example, what are the major sources of greenhouse gas (GHG) emissions in the County? 56

3. Section 3.6.4 Methodology section indicates that MOVES, Aviation Environmental Design Tool (AEDT), and Air Carbon and Emission Reporting (ACERT) are used but there is no reference to Appendix D where the reader can find the output data. 57

4. Table 3.6-1 Summarizes GHG data but there is no reference to where the output data is located. The second column is labeled “Activity” but this would be better labeled “Construction Activity” so that the reader can relate this data to the construction GHG discussion below. 58

5. The conclusion for this section indicates that, while there will be increased GHG emissions because of Project construction, it would be an incremental increase for Travis County. The document does not provide a discussion of the current GHG issues or sources in Travis County to support this conclusion. While it is true that GHG emissions during construction are generally not considered significant, because of duration and lack of stationary sources (i.e., trucks and heavy 59

equipment are not stationary), the document should include some discussion of why construction emissions would comprise a very small amount of GHG emissions in Travis County.	59
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6. Section 3.6.6 Mitigation: While there is no required mitigation identified (which is appropriate), this section introduces the City of Austin's Climate Equity Plan. Table 3.6-3 summarizes components of the Plan and the Project components where GHG will be reduced. The discussion comes from nowhere as there is no discussion of the Climate Equity Plan and the table does not really show HOW GHG would be reduced. Some of the items listed as applicable appear to be exiting features (i.e., the airport currently has 9 buildings with green certification (i.e., LEED) but doesn't provide any information that this would reduce GHG for the Proposed Action. Some of the information in Table 3.6.6 would be better located in the Affected Environment section to document the requirements specified in FAA Order 1050.1F for the current level of preparedness for climate change since most of these items are ongoing.	60
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3.7 Department of Transportation Section 4(f)

1. The figures for the 4(f) discussion are included after the start of Section 3.8 making it difficult to understand where Section 3.8 begins. Recommend formatting the document so that the information for each section is completely contained within that section to avoid confusion.	61
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3.8 Hazardous Materials, Solid Waste, and Pollution Prevention

1. Section 3.8.2.1 Hazardous Materials. Former Bergstrom Air Force Base (BAFB) is listed as a hazardous materials site, but no regulation or citation are identified, was it under CERLCA or were there RCRA wastes?	62
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2. Deed restrictions are identified for Parcel 7. Is this area part of the Proposed Action? To avoid confusion, indicate whether it is and refer to a figure for the reader to understand location.	63
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3. Solid Waste Management Unit 76 has not received closure. How will the proposed action affect this open remediation action?	64
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4. AUS contains seven (7) existing landfills created by Air Force base operations. Are these still being used and if so, what is being deposited there.	65
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5. Section 3.8.2.2 Solid Waste. Texas Disposal Systems (TDS) is being used by the Project for deposition of solid waste. While the capacity of this landfill is identified and that the landfill capacity can be expanded, there is no discussion of the estimated cubic yardage of solid waste that would be produced by the project. To evaluate the Project's contribution to local landfill capacity, some estimation of how much solid waste the project will produce is needed. Additionally, the solid waste discussion should differentiate between waste and hazardous waste and whether specific landfills are authorized to take specific types of waste.	66
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6. Section 3.8.5.2 Proposed Project. Indicates that if the Project would occur indeed restricted areas, information would be shared with the design team. This information should be identified now and included in the EA for public disclosure.	67
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7. Section 3.8.5.2 Proposed Project. Text indicates that an asbestos survey and abatement plan was prepared. Has the abatement taken place? When is it scheduled? Appendix G indicates that the abatement has already occurred. Please provide more details.	68
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8. Per FAA Order 1050.1F, the Environmental Consequences discussion should include, but not limited to: description of the waste generated from construction, identify the regulatory classification, handling, transportation and disposal requirements of each waste stream,	69
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determination of whether waste disposal of the proposed action would result in impacts on facility disposal capacity, or whether the proposed action would interfere with any ongoing remediation in the vicinity of the project. This information is not included in the analysis.

69

3.9 Historical, Architectural, Archeological, and Cultural Resources

1. The text states that “[t]he direct Area of Potential Effect (APE) is the same as the Project Study Area. The indirect APEs considered for the Proposed Project include two zones surrounding the direct APE: the Visual APE (½ mile beyond the direct APE) and the Noise APE (within the projected 65 DNL noise contour for the Proposed Project.” This section should include an exhibit which clearly identifies the limits of the Visual APE and the Noise APE, with the listed and potentially eligible for listing historic resources identified to document the effects or lack thereof of the Proposed Action on historic, architectural, and cultural resources.

70

2. Rather than refer to a reference in Chapter 5, References, regarding consultations with the TX SHPO, the analysis should refer to letters to and from the SHPO and responses by the applicant and/or FAA to comments and recommendations of the SHPO. Additionally, Section 3.9.5.2 states that “FAA and Texas SHPO concurred that no above-ground historic architectural resources are present within the direct or indirect APEs” and references “Baer Engineering and Environmental Consulting, Inc., August 24, 2021,” rather than documentation of consultation, which needs to be included in Appendix I in accordance with FAA Order 1050.1F (see comments on Appendix I).

71

3.10 Land Use

1. Figure 3.10-2 is difficult to read. The gradation between colors makes it difficult to identify exactly where the overlay zones are delineated.

72

2. For new facilities such as the new employ parking (S-2 and S-5) off Cardinal loop, recommend showing off-airport facilities either in a figure with the overlay zones or a table listing the project facilities and the corresponding overlay zone to show that the facilities are consistent with the specific overlay zone.

73

3. Because the severity of impact for land use can be dependent on the significance of impacts in other resource areas, (i.e., noise, socioeconomics), recommend text cross-referencing where other land use related impacts are analyzed and discussed.

74

Section 3.11 Natural Resources and Energy Supply

1. Section 3.11.5.2 Proposed Project states “The Proposed Project would increase the demand for electricity by about 8 megawatts (MWs). Project components U-1 (new central utility plant), U-2 (new Austin Energy substation), and U-3 (new electrical lines) are included as part of the Proposed Project to ensure that there is adequate capacity for providing the needed electricity to operate the Proposed Project.” The location of these components should be referenced back to Exhibit 1-8 for project clarity.

75

2. Section 3.11.5.2 Proposed Project states “In 2032, fuel consumption under the Proposed Project would be slightly greater than that of the No Action Alternative because of the slightly greater number of aircraft operations.” However, Section 2.4.5 (No Action Alternative) states “In 2032, the existing BJT and South Terminal would not be able to accommodate the forecast increase in passengers and would not provide an adequate number of aircraft gates or adequate space for any other terminal-related facility.” Thus, in 2032, fuel consumption by aircraft and support vehicles under the Proposed Project would presumably be much greater than that of the No Action

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Alternative because of the significantly greater number of aircraft operations and passenger enplanement.	76
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Section 3.12 Noise and Noise-Compatible Land Use

1. No construction-related noise is discussed or analyzed. Given that this is an airport, noise related to ambient conditions and sensitive receptors may not result in an increase; however, no discussion is included for the reader to understand. For areas within the existing airport, noise during construction would not result in increased noise impact on sensitive receptors. However, for new components beyond the airport proper (i.e., S-2 and S-5) that constitute construction in greenfield areas, there is no discussion on whether there are sensitive receptors that may be impacted by construction noise.	77
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2. Acronyms are not defined on first use in this section. Very confusing to the layperson.	78
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3. No explanation of noise or noise metrics such as DNL or CNEL, dBA, or definition of sensitive receptors and what are the effects of noise on the human ear. These concepts are explained in Appendix D Section 6.1 but there is no reference to where the reader can find this information. This information should be moved into the document so that the layperson can understand how noise changes could occur.	79
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4. Section 3.12.5.1 Proposed Project. Third paragraph: "Analysis shows less than reportable levels of change in DNL because of the 2032 Proposed Project compared with the No Action Alternative" What does "less than reportable" mean? Does this mean there is not a change or that the change is no detectable to the human ear and there would be no impact? Nonreportable isn't explained.	80
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Section 3.13 Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks

1 Section 3.13.1 Socioeconomics. The EA in Section 3.13.1.2 Affected Environment cites "U.S. Census Bureau. 2019 ACS 5-Year Estimates, Population and Households" as the source of data for population, housing, and employment data. The U.S. 2020 Census data is now available. The EA should be updated with this available data to accurately characterize the affected environment.	81
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2. Section 3.13.1.2.2 Employment only discusses the unemployment rates in the study areas. No data or information on existing employment at ABIA or within the General Study Area is presented.	82
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3. Section 3.13.1.3 Significance Threshold. The EA accurately notes that the FAA has not established a significance threshold for socioeconomics in FAA Order 1050.1F but that the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts for socioeconomics. The EA lists those factors in this section but fails to note that those factors are not the only factors that FAA is to consider. As stated in FAA Order 1050.1F Desk Reference text on determination of significance for socioeconomic impacts "Factors to consider that may be applicable to socioeconomic resources. . . include, but are not limited to, situations in which the action would have the potential to:" cause the consequences as listed in Section 13.1.3. One of those factors is "cause extensive relocation of community businesses that would cause severe economic hardship for affected communities" Another factor that FAA should consider would be the potential loss of businesses because of the Proposed Action. Such loss could or would occur with the proposed demolition of the South Terminal.	83
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4. Section 3.13.1.5 Environmental Consequences. No data on employment under the Proposed Action or No Action alternatives is presented. This is a significant omission, failing to provide the FAA decision maker with objective data to evaluate the socioeconomic impacts of the Proposed Action. 84

5. As noted in Exhibit 12-2 of the Desk Reference, the FAA should consider determining the impacts of the proposed action and alternatives on employment in the study area. Additionally, the EA should consider the effects of the proposed action and alternatives on the reduction of or increase in economic activity in the study area. Section 3.13.1.5.2.2 Employment, which discusses impacts of the Proposed Action, includes no data to support the statements. For example, there are existing businesses that operate in the South Terminal. There is no analysis of the impacts from closing and demolishing the South Terminal, as proposed under the Proposed Action, on existing airlines or concession operations that currently operate out of the South Terminal nor on the impact on their current employees. Will all existing airlines that operate from the South Terminal be provided gate and other space under the Proposed Action to continue to operate without interruption of service? What about concessions that currently operate at the South Terminal? Any loss of employment could have a disproportionate high and adverse impact on minority and/or low-income populations in the study area that are currently employed by the businesses operating at the South Terminal or at other facilities that will be demolished under the Proposed Action. 85

6. NEPA Categorical Exclusion (CATEX) Documentation on November 8, 2016, for Rehabilitation and Reconstruction of the South Terminal assessed the effect of current operations at the AIBA and if any residents or businesses would be relocated as part of the rehabilitation and reconstruction project in in Section 304d. Disruption of an Established Community of the CATEX. The EA should consider the same by assessing the effects of the current operation at the South Terminal. 86

7. Section 3.13.1.5.2.1 Population and Housing states that the ". . . Proposed Project would not relocate residents, housing units, or businesses within the General Study Area. This is not an accurate statement. The South Terminal and its associated airlines, concessionaires, ground handling vendor, and building management vendors would be impacted. This impact should be mitigated by a slight relocation of one of the proposed cross-field taxiways or with the relocation of the facility farther south on the airport property in an area with no proposed permanent use. 87

Section 3.13.2 Surface Traffic

1. Section 3.13.2.2 "*Due to the unique operations of the south terminal and AUS, traffic was not grown using passenger data from 2017 to 2019*" What is the unique operations at South Terminal? Why was data not grown during this period (renovations to the South Terminal during this time?). 88

2. Since the South Terminal would be closed and it is assumed that the two lost-cost airlines would be relocated, how would existing traffic change because of these new locations at BJT? Would relocating these airlines result in additional vehicles on roads leading to the new terminals. The analysis is silent on where vehicles current driving to the South Terminal will go if the South Terminal is removed. 89

3. Future 2027 and 2032 changes to existing SH 71 and Spirit of Texas Drive intersection: are these changes resulting from the Project or resulting from other projects? Is this the TxDOT SH 71 Project? When is this project scheduled? 90

4. There is no discussion of construction traffic including increase in traffic resulting from delivery of materials and off-hauling of debris, equipment on roadways coming and going from laydown areas (i.e., S-2 and 2-5 off Cardinal Loop). There is no identification of potential haul routes allow for 91



analysis of traffic related impacts during construction but also analysis related to construction noise, air quality, and transportation of waste. FAA 1050.1F, while not establishing thresholds for significance for surface traffic, does recommend considering whether the project would disrupt local traffic patterns and substantially reduce levels of service of roads serving the airport and surrounding community. While this was provided for operation, there was not discussion of construction. Considering that the analysis indicates levels of service (LOS) of D or F for most roadways in the vicinity of the airport (Appendix H), construction traffic impacts could result in further reduction of LOS and impact surrounding businesses and residents.

91

5. The expansion project does not include work related to overall airport vehicular access. The EA indicates that the primary roadways leading to the airport are generally at LOS D or lower but seems to rely on and shows the No Project Alternative generally at LOS F for peak hours indicating significantly delays during peak travel periods (Table 3.13-4). The three (3) primary intersections are all LOS F under the No Project Alternative. The EA indicates that the intersection of Burleson Road and Emma Browning Avenue would improve under the Proposed Project but it's unclear how this would occur. Would this improvement occur with the grade separation identified in the Project Description? How exactly would this intersection improve under the Proposed Project. The description is significantly missing in both the Project Description and surface traffic analysis. In general, there is no plans for overall traffic improvements as part of the expansion project and considering the level of existing growth and future growth identified in the Purpose and Need, this appears to be a major oversight in airport planning.

92

Section 3.13.3 Environmental Justice

1. Section 3.13.3 should include an introductory text explaining to the reader the purpose of the Environmental Justice analysis, namely, to determine if a disproportionate share of the Proposed Action's potential impacts would be borne by low-income and/or minority populations. Furthermore, the review examines the extent to which populations of concern located in the area would experience disproportionately high and adverse environmental impacts because of the Proposed Action as well as project-induced benefits.

93

2. Section 3.13.3.2 fails to present data on minority and low-income population at the Block Group level within the Study Area to provide a description of the baseline Affected Environment for analysis of environmental consequences of the Proposed Action. Block Group data from the U.S. 2020 Census is available and should be used. This data needs to be presented in the EA, ideally in a table. While a map of the block groups is presented in Section 3.13.1.2 Socioeconomics, Affected Environment, the data on minority and low-income persons within those block groups is not presented. Absent this data, it is impossible for the reader to understand if there are disproportionately high and adverse environmental impacts on minority or low-income populations within those block groups that may be affected by changes in air quality, noise, traffic, or other effects of the Proposed Action.

94

3. Pursuant to CEQ guidance ("Environmental Justice: Guidance Under the National Environmental Policy Act" (December 10, 1997)) minority populations exist where: "(a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis." In consideration of this guidance, as a conservative approach, the threshold for identifying environmental justice populations within the study area for the Proposed Action based on minorities should be 50 percent for the analysis completed for this

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- EA. The CEQ guidance and FAA Order 1050.1F do not recommend specific thresholds for defining low-income populations in environmental justice analysis. 95
- 4. Based on a review of demographic data presented in the 2040 Master Plan, many Census Block Groups have a minority population that exceeds 50 percent and, therefore, would be considered an environmental justice population. 96
- 5. As stipulated in the FAA Order 1050.1F Desk Reference, “. . . not all ‘adverse impacts’ within the meaning of DOT Order 5610.2(a) [Environmental Justice in Minority and Low-Income Populations] will meet or exceed a significance threshold in another environmental impact category. Some adverse impacts may not be significant impacts in another environmental impact category as defined by Exhibit 4-1 in FAA Order 1050.1F, yet they may be a significant impact when examined in the context of their effects on minority or low-income populations. As a result, the responsible FAA official must undertake a case-by-case analysis of an action’s unique facts. The responsible FAA official does this to determine if impacts not otherwise rising to a level of significance for NEPA purposes nonetheless represent disproportionately high and adverse effects, and/or a significant impact for environmental justice purposes.” (Parentheses added) 97

Section 3.14 Water Resources

- 1. Section 3.14.1.2 refers to the “National Wetland Inventory”, but it should be National Wetlands Inventory. 98
- 2. Section 3.14.1.2 refers to “Figure 3.14-1”. All previous maps are referred to as “Exhibits” and this one is referred to (and titled) “Figure.” 99
- 3. Section 3.14.1.2 is poorly written and confusing. Section 3.14.1.2 states “The U.S Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) mapper shows that there are three riverine features (R4SBC) located on the east side of the Project Study Area and one Freshwater Forested/Shrub Wetland (PFO1A) located south of the radar station (see Figure 3.14-1).⁴⁵ There is no reference to R4SBC, PF01A, or the radar station on Figure 3.14-1. This figure also depicts three Freshwater Emergent Wetlands and three riverine features within the eastern portion of the Project Study Area but does not depict a Freshwater Forested/Shrub Wetland. 100
- 4. Section 3.14.1.2 states “During field surveys, the NWI features within the Project Study Area did not meet the U.S. Army Corps of Engineers (USACE) wetland definition based on vegetative cover. Field surveys identified four assumed-non-jurisdictional wetlands and one assumed-non-jurisdictional wetland within or adjacent to the Project Study Area, described in the Table 3.14-1 and shown in Figure 3.14-1.” There should be a period between the words “cover” and “Field” and there is an unnecessary hyphen between “assumed” and “non.” Furthermore, it isn’t clear if these field-verified wetlands are also the wetlands indicated by the NWI data or if they are separate from the NWI mapped wetlands. If they are the same wetland features, why would vegetative cover prevent them from being considered jurisdictional, but they would still be considered non-jurisdictional wetlands? 101
- 5. Section 3.14.1.4 states “Following the desktop effort, field surveys were performed within the Project Study Area on August 31, September 1, and September 9, 2021. This effort followed guidance from the 1987 USACE Wetland Delineation Manual, Atlantic and Gulf Coast Plains Regional Supplement, and local regulatory guidance. Wetlands were identified based on vegetation presence; full wetland delineations were not performed.” The Project Study Area is located within the Great Plains region and thus the USACE Wetland Delineation Manual, Great Plains Regional Supplement should have been used instead of the Atlantic and Gulf Coastal Plain 102

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| <p>supplement when delineating wetlands. Additionally, this section states “full wetland delineations were not performed”; however, Figure 3.14-1 and Table 3.14-1 provide “field verified” wetlands and this section makes determinations about jurisdictional and non-jurisdictional wetlands. How can these determinations be made without conducting full wetland delineations? Also, how was the 1987 USACE Wetland Delineation Manual followed for this effort, but full wetland delineations were not conducted? This seems inconsistent. This also begs the question of whether other unidentified wetlands exist within the Project Study Area since a full wetland delineation was not conducted. These unidentified wetlands may be adversely impacted by the Proposed Project and may conflict with FAA Order 1050.1F.</p> | <p>102</p> |
| <p>6. Section 3.14.1.5.2 states “Therefore, no impacts to wetlands would occur as a result of the Proposed Project.” How can this statement be made if a full wetland delineation has not been completed?</p> | <p>103</p> |
| <p>7. Section 3.14.1.5.2 states “The Proposed Project would have no direct impacts to the Shapard Wetland, which is assumed to be jurisdictional, or its buffer area. Indirect impacts from construction and development runoff into the Shapard Wetland could occur.” Indirect impacts from construction runoff would in fact be a direct impact to a wetland community via sediment loading, reduced water quality, and changes to the hydroperiod. This would be a violation of the Clean Water Act Section 404 guidelines and would require USACE Section 404 permit coverage. It would also violate the Section 404 permit general conditions as they pertain to water quality.</p> | <p>104</p> |
| <p>8. The following section 3.14.1.5.3 states “All construction would avoid wetlands; therefore, the Proposed Project would result in no impacts to wetlands. No mitigation measures are proposed.” This statement appears to conflict with the prior statement about the Shapard wetland.</p> | <p>105</p> |
| <p>9. Section 3.14.3.2 states “Except for Onion Creek, none of the channels, ponds, stream and/or creeks on or immediately adjacent to the Airport property are considered perennial streams.” However, the Colorado River is perennial and is located immediately adjacent to the Airport property on the north/northeast side of the Project Study Area. This statement needs to be clarified.</p> | <p>106</p> |

Chapter 4 Consultation

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| <p>1. The EA must include a list of agencies and persons consulted (see FAA Order 1050.1F, 6-2.1(h)). The list should include federal, state, and local agencies, utilities, and stakeholders. Moreover, Section 4.2 should identify if ABIA has discussed impacts to tenants (such Frontier, Allegiant, Highstar Capital IV, LP, with the relevant entities as part of lease agreements and negotiations and the results of those consultations.</p> | <p>107</p> |
| <p>2. This section should be updated to include comments from the Virtual Public Meeting on March 23, 2022.</p> | <p>108</p> |

LIST OF EXHIBITS

Exhibit 3.2-1 Project Study Area and General Study Area

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| <p>1. Comment: Exhibit 3.2-1 refers to the Project Study Area as the “Detailed Study Area” in the legend, but Project Study Area in the title block.</p> | <p>109</p> |
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Exhibit 3.5-1 Wildlife Resources in the General Study Area

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|---|------------|
| <p>1. Comment: Exhibit 3.5-1 refers to the Project Study Area as the “Detailed Study Area” in the legend.</p> | <p>110</p> |
|---|------------|

Exhibit 3.13-1 Census Tracts in Project Study Area and General Study Area

1. Comment: Exhibit 3.13-1 refers to the Project Study Area as the "Detailed Study Area" in the legend, but Project Study Area in the figure title.	111
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Exhibit 3.14-1 Wetlands in Project Study Area and General Study Area

1. Comment: All previous maps are referred to as "Exhibits" and this one is referred to (and titled) "Figure."	112
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2. Comment Figure 3.14-1 refers to the Project Study Area as the "Detailed Study Area" in the legend, but Project Study Area in the figure title and title block. It also refers to the General Study Area in the figure title and title block but does not depict the General Study Area on the figure.	113
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Exhibit 3.14-2 Wetlands in Vicinity of Project Components in U-2 and U-3

1. Comment: Previous maps are referred to as "Exhibits" and this one is referred to (and titled) "Figure."	114
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Exhibit 3.14-3 Floodplains in Project Study Area and General Study Area

1. Comment: Previous maps are referred to as "Exhibits" and this one is referred to (and titled) "Figure."	115
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2. Comment: Figure 3.14-3 refers to the Project Study Area as the "Detailed Study Area" in the legend, but Project Study Area in the figure title and title block. It also refers to the General Study Area in the figure title and title block but does not depict the General Study Area on the figure.	116
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Appendices

Appendix B – Project Components

1. Project A-1, Relocation of Taxiways H and J do not appear to be the same project as A-4 South Crossfield Taxiways in the table that comprises Appendix B. Exhibit 8.3-1 in the 2040 Master Plan Implementation Plan identifies project A-4 as the South Crossfield Taxiway Bridge. The Master Plan Alternative 4, which is like the Proposed Project, shows two new taxiways immediately south of the proposed Future Concourse and the Preferred 2037 Terminal Alternative also shows new taxiways closer to the Future Concourse.	117
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Appendix C – Regulatory Texts

1. "Regulatory Text" does not adequately describe the content of this Appendix. This appendix includes definitions for noise and other resource areas that would be better suited in the Affected Environment sections of the document.	118
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Appendix D – Air Quality and Noise Reports

1. This report provides the data outputs for the noise and air quality monitoring. The data outputs appear to be accurate and thorough. However, the information is not presented such that the average reader would be able to understand the analysis. For example, for the MOVES outputs, the type of equipment, horsepower, and construction hours are provided in the input to the model. But this information is not summarized or explained for the reader. The model output data needs to be summarized in the Affected Environmental Consequences section so that the analysis and	119
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conclusions are clear. Expecting the reader to understand and summarize the model output tables in this appendix and then apply that to the conclusions made in the analysis appears to assume the reader will give up allowing for potentially incomplete analysis to be moved forward. 119

Appendix E – Texas Parks and Wildlife Correspondence

1. The TPWD letter in Appendix E is fairly standard for project reviews and provides general project impact avoidance guidance and recommendations. In particular, the Proposed Project has the potential to impact monarch butterfly (candidate for federal T&E listing) habitat and the letter recommends “incorporating pollinator conservation and management into the revegetation and maintenance plan for this project, such as promoting growth of native flowering species throughout the growing season. TPWD recommends revegetation efforts include planting or seeding native milkweed (*Asclepias* spp.) and nectar plants as funding and seed availability allow. Information about monarch biology, migration, and butterfly gardening can be found on the Monarch Watch website.” 120

2. TPWD recommends excluding vegetation clearing activities during the general bird nesting season, March 15 through September 15, to avoid adverse impacts to breeding birds. If clearing vegetation during the migratory bird nesting season is unavoidable, TPWD recommends surveying the area proposed for disturbance to ensure that no nests with eggs or young will be disturbed by operations. 121

Appendix F – List of Rare, Threatened, & Endangered Species in General Study Area

1. USFWS Species List – Austin Ecological Services Field Office Travis County Endangered Species Report – Texas Parks and Wildlife Dept. 122

2. Section 3.5.2.2 states “U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) identified 14 federally listed or proposed threatened, endangered, or candidate species with the potential to occur in the General Study Area.” However, the IPaC report provided in Appendix F only evaluated the Project Study Area and did not include the General Study Area. 123

Appendix G – Asbestos Surveys and Abatement Activities

1. No comments on the Appendix. Comments related to the asbestos discussion are provided in the Hazardous Materials section. 124

Appendix H – Surface Traffic Counts and Models

1. This Appendix is merely output data from the Sync model and traffic counts and intersection/interchange changes. It does not include a discussion or analysis of how the Proposed Action alters traffic flows during construction or during operation. No discussion of construction traffic increases, haul routes, or road closures is included to allow the reader to understand how changes could occur. As with other appendices, information this technical report should be summarized and included in the Affected Environment and Consequences sections so that the read can clearly understand how the document’s conclusions are made. 125

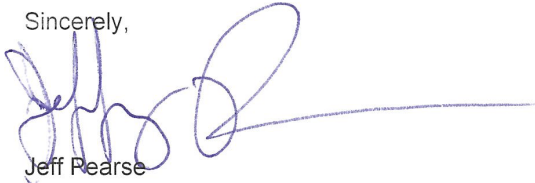
Appendix I – Consultation and Public Outreach

1. This Appendix needs to include documentation of coordination or required consultations under Section 106 of the NHPA, Section 7 of the ESA, and other applicable laws and regulations with all affected Federal, state, tribal, and local officials and copies or a summary of their comments or 126

recommendations and the responses to such comments and recommendations (see FAA Order 1050.1F, 6-2.1.i(2))	126
2. Chapter 3, Section 3.7 references consultation with the TX SHPO, but the evidence of such consultation and responses to SHPO comments and recommendations is not included in Appendix I. Additionally, correspondence from Texas Parks & Wildlife is included, but responses to their comments and recommendations is not included.	127
3. Appendix I needs to include a summary of public involvement, including evidence of the opportunity for a public hearing, if required under applicable Federal laws (e.g., the Airport and Airway Improvement Act of 1982, 49 U.S.C. § 47106(c)), regulations, and orders, and a summary of issues raised at any public hearing or public meeting as well as responses to substantive comments (see FAA Order 1050.1F, 6-2.1.i(3)).	128

We appreciate your review and consideration of our comments and look forward to receiving written responses to each of our concerns and comments. If you have any questions, please do not hesitate to contact me at 917-574-8475 or jpearse@austinsouthterminal.com.

Sincerely,

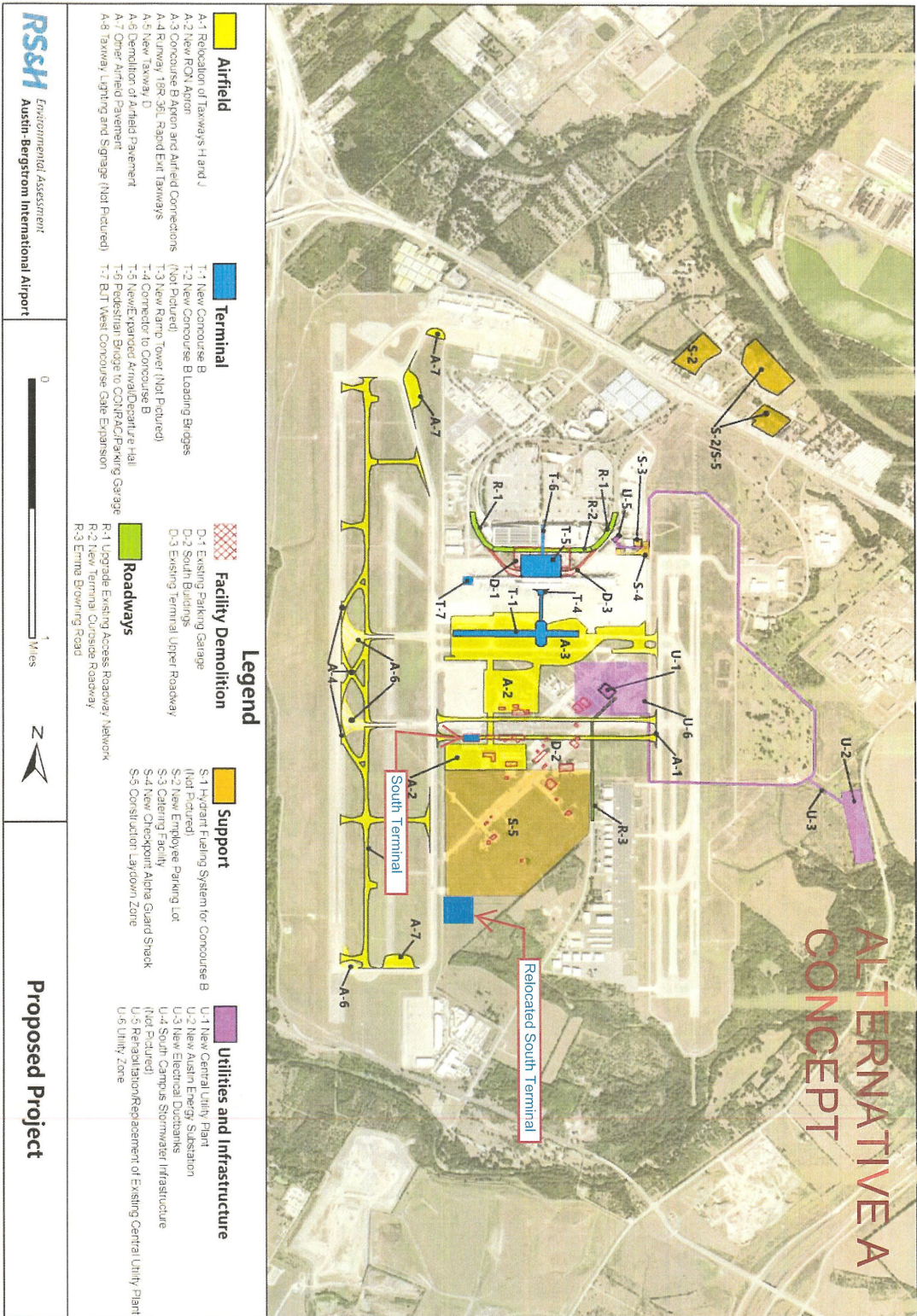


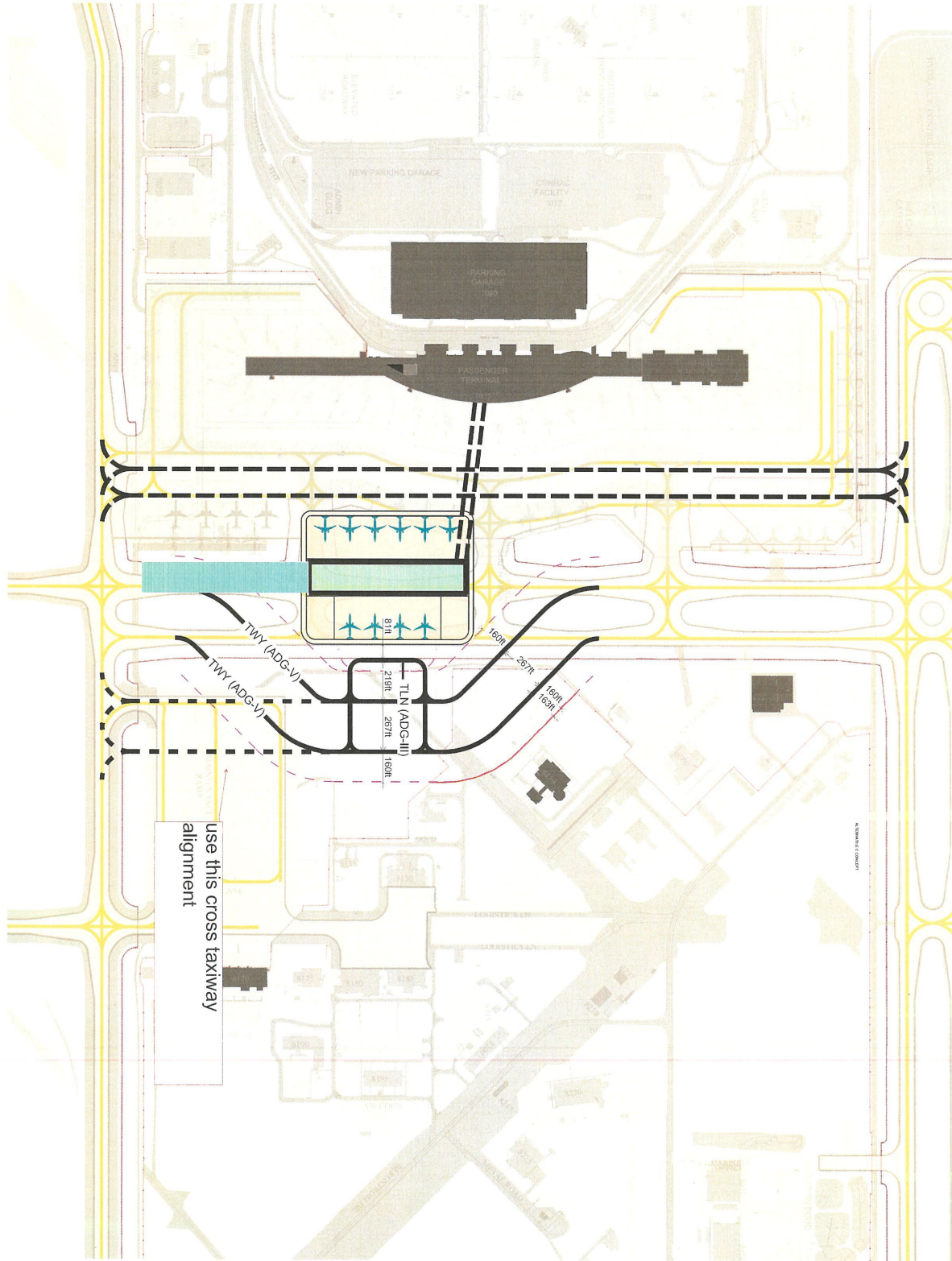
Jeff Pearse

CEO Lonestar Airport Holdings LLC

Austin South Terminal

Enclosures: Alternative A concept
 Alternative C concept





Response to Commenter O-3

1. The commenter's suggestion for an Executive Summary is acknowledged. However, an Executive Summary is not required for an EA.
2. In compliance with Council on Environmental Quality (CEQ) regulations, the EA is 75 pages in length. In accordance with those CEQ regulations, tables and exhibits are not counted in the page total. Thus, no approval is needed from a senior FAA official for exceeding the page limit.
3. Section 3.4.5.2.2.2 identified the air quality permit from the Texas Commission on Environmental Quality (TCEQ) associated with the new boiler. In addition, Section 3.14.3 identified the need for a permit for increase in stormwater runoff as part of the Texas Pollution Discharge Elimination System (TPDES) and the City of Austin site development permit.

Section 1.6 of the EA has been added to include these permits and approvals.

4. Section 1.2.2.2 has been revised to expand the discussion of the current operations of the South Terminal.
5. Section 1.2.2.2 describes the existing terminal facilities. Table 1-2 details the facilities within the South Terminal, including the three aircraft gates. Further, Exhibit 1-5 depicts the aircraft parking area, automobile parking lots, and paved driveways. Ancillary facilities, such as Transportation Network Company parking and security booths are not specifically identified as these facilities are not relevant to the broader purpose and need, which, as described in Section 1.3.1 is "to provide facilities that will accommodate forecast increases in enplanements at an adequate level of service and enhance the operational efficiency of the airfield". In addition, as discussed in Section 1.3.2, the Proposed Project is designed to address four needs:
 - insufficient passenger processing facilities and gates to accommodate forecast enplanements at an adequate level of service;
 - inefficient taxiways on the west airfield;
 - achieve Airport Design Group (ADG) VI design standards for designated taxiways; and
 - maintain efficient movement area access between the east and west airfields.
6. Runways are identified either with a hyphen or a slash, as in 18R-36L or 18R/36L. For consistency purposes, the EA uses the same convention that was used throughout the AUS Master Plan.

Exhibit 1-2 is the standard FAA Airport Diagram (available at https://www.faa.gov/airports/runway_safety/diagrams/). For clarity, Exhibit 1-3 was included to clearly differentiate between the Barbara Jordan Terminal and South Terminal. Exhibit 1-3 has been revised to include labels for the runways.

7. As indicated in the response to comment #4 of this comment submission, Section 1.2.2.2 has been revised to provide further information regarding the current operation of the South Terminal. However, compliance with NEPA does not require the level of detail recommended by the commenter regarding entities operating at the Airport through lease or operating agreements. Sections 3.13.1.2.2 and 3.13.1.5.2.2 have been revised to discuss employment at the South Terminal.
8. Exhibit 1-5 has been revised to show the additional public parking locations in the vicinity of the South Terminal.
9. The percentage change in aircraft operations and enplanements at the Airport is not required for the EA because none of the project components are based on those percentage changes. In addition, because of the COVID-19 pandemic, presenting percentage changes that involve the years 2020 and 2021 would be misleading in describing trends in aircraft operations and enplanements. For reference, aircraft operations are expected to increase by an average of 0.8% between 2002 and 2032 and passenger enplanements are expected to increase by an average of 4.7% between 2002 and 2032.
10. The information on passenger enplanements provided in Exhibit 1-7 is from the FAA's Terminal Area Forecast for AUS. No revisions to this information is warranted.
11. The commenter is correct in noting that there are four independent needs that affect the future ability of AUS to maintain its essential function as the primary commercial service airport in Central Texas. As a result, the first sentence of Section 1.3.2 has been revised.
12. The information presented in Table 1-5 is associated with both the Barbara Jordan Terminal and the South Terminal. If a functional component is deficient at one or both terminals, then it is identified as being deficient in Table 1-5. No differentiation between the two terminals is warranted for identifying whether the functional components meet or are deficient.

Thus, the existing terminal gates discussed in the section include South Terminal gates. The Proposed Project is for 20 additional gates which are

required to meet the passenger forecast. As stated in Section 2.2, the No Action Alternative would include the three gates at the South Terminal plus up to 20 hardstands for remote passenger operations.

13. As stated in Section 1.3.2.1, the reference to 57 gates is from the Master Plan. This is an overall assessment of the number of gates needed at the Airport and does not indicate where those gates would be located.
14. The airfield at AUS includes two widely-spaced runways, which are currently connected by a pair of crossfield taxiways. The purpose of these crossfield taxiways is to facilitate bi-directional movement of aircraft from one side of the airfield to the other. With regard to the airfield, the Master Plan assumed that an apron edge taxilane in combination with a single separate taxiway could provide sufficient crossfield movement capacity. However, after completion of the Master Plan, the Department of Aviation conducted significant additional technical discussions with the Federal Aviation Administration (FAA) Air Traffic Control during which the parties noted that the Master Plan taxiway configuration would involve aircraft transiting areas known as "non-movement areas", which are not under the control of the FAA. This could cause aircraft delays and potentially require aircraft to be escorted by ground vehicles while in the non-movement area. As a result, the Department of Aviation concluded that the single planned taxiway near the apron (as envisioned in the Master Plan) would have limited lifespan and would represent a sunk cost as it would need to be replaced in another location in short order. Therefore, in coordination with the FAA, the Department of Aviation decided to add a second taxiway to the proposed cross taxiway location south of the proposed new Concourse B to provide the most efficient aircraft crossfield movement. It should be noted that this taxiway layout mimics the previous FAA-approved Airport Layout Plan (ALP), having been evaluated in the previous Master Plan. This revision was described in more detail in the Memorandum to the Mayor and City Council dated July 13, 2021 and is included in Section K.4.
15. The commenter is correct in noting that the Proposed Project includes 32 project components. As a result, the first sentence of Section 1.4 has been revised
16. The commenter is not correct in asserting that the Proposed Project is a head house and concourse project. As stated in Section 1.4, the Proposed Project has many project components that are not associated with a head house or a concourse. Project D-2 includes the demolition of the South Terminal.
17. Project T-4 has been revised to read that the connector would be a tunnel between the existing BJT and the new Concourse B.

Project T-5 is described as the construction of a new/expanded arrival/departure hall and is not described as a concourse. As a result, no revisions to the EA are warranted.

18. Exhibit 1-8 does include Project T-7. In addition, the text in the EA does indicate that the three additional aircraft gates of the BJT would increase the number of aircraft gates from 34 to 37. No revisions to the EA are warranted.
19. The construction lay down zone on the south side of the Airport was sized to give adequate room and flexibility for staging equipment and materials and to allow for a buffer to surrounding areas of the Airport. With regard to the haul routes, those will be identified for the various project components as they progress further into design over the next 5 to 7 years.
20. The definitions of AIP (Airport Improvement Program) and PFC (passenger facility charge) have been added to footnote /c/ in Table 1-7.
21. The demolition of the South Terminal is eligible for Airport Improvement Program (AIP) funding. Passenger Facility Charge (PFC) funding is typically reserved for airport debt service.
22. The commenter is correct in noting that Project A-1 in Table 1-7 should read "Relocation of Taxiways H and J". Table 1-7 has been revised.
23. The 2040 Master Plan was submitted as a final draft to the FAA in 2019 following Austin City Council acceptance in late 2018. The FAA then reviewed and accepted the Final Draft of the 2040 Master Plan in March 2020. During the review time there were no additional versions of the Master Plan. Airport Layout Plans (ALPs) are subject to review and reconsideration as programs and projects enter the implementation phase. It should be noted that the crossfield taxiways that are part of the Proposed Project are not new alternatives as they were on previous FAA-approved ALPs.
24. The purpose and need for the Proposed Project is to provide facilities that will accommodate the forecasted increase in enplanements at an adequate level of service and enhance the operational efficiency of the airfield. The Proposed Project addresses the four major components of the Purpose and Need (as discussed in Section 1.3.2) including insufficient passenger processing and gate facilities, inefficient taxiways on the west airfield, achieving ADG VI design standards for designated taxiways, and maintaining efficient movement area access between the east and west airfields.

The Master Plan, completed in 2018, included the alignment of Taxiways H

and J and other airfield components of taxiways [runway high speed exits], as well as other components of the Proposed Project, such as landside access, employee and public parking, support facilities, and utilities that meet the purpose and need for the Proposed Project. In addition, the proposed alignment of Taxiways H and J was further evaluated in 2020 through an independent screening process. This study determined that the Taxiways H and J alignment proposed in this EA (Taxiway Alignment) is the optimal alternative that best meets the screening criteria related to financial feasibility, operational safety and efficiency, and compatibility with future development. As a result, the optimal Taxiway Alignment is shown for EA Alternatives 2, 3, and 4 where the current taxiway alignment could not be maintained. Terminal Alternative 5 of the Master Plan, as mentioned by the Commenter, was not included in the EA analysis due to a focus on reasonable alternatives that maximized existing infrastructure and access points on the north side of the Airport.

Because the Taxiway Alignment requires that the South Terminal Facility be included in Project D-2: Demolition of South Buildings, LoneStar Airport Holdings, the operator of the South Terminal, was notified on July 13, 2021 that the City of Austin would acquire its leasehold interest in the South Terminal facility owned by the City.

25. Section 504.d.1 of FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions, requires that:

“[a]irport sponsors and their planners consider various ways of solving an airport’s problems before FAA begins its formal NEPA process. According to Chapter 5 of AC 150/5070-6B, the sponsor, its planners, and FAA airport planners, during project master planning, should consider safe, efficient alternatives within the airport sponsor’s or FAA’s jurisdiction. When developing these alternatives, FAA environmental specialists should advise the sponsor and the planners about obvious, sensitive environmental resources in the airport vicinity. This step highlights the need for the sponsor and planners to consider alternative project layouts or designs that could eliminate or reduce environmental impacts when the widest range of layout or design options exists.”

Prior to initiating the formal NEPA process and prior to the development of the alternatives for the Proposed Project as set forth in Section 2.2, the Department of Aviation – in coordination with FAA – conducted significant analyses on several components of the Proposed Project, and including, specifically, the analysis to determine the optimum alignment of the midfield taxiway (Taxiway Alignment).

The screening analysis identified the optimal alternative for the Taxiway Alignment that best meets the screening criteria related to financial feasibility, operational safety and efficiency, and compatibility with future development. The “three alternatives” provided by the commenter are not consistent with the optimal alignment identified by the City of Austin Department of Aviation and FAA. By contrast, the selected Taxiway Alignment included as a component of the Proposed Project not only meets all FAA design standards for aircraft movement, but also will enable the most efficient operation of aircraft movements as coordinated with FAA Air Traffic Control, resulting in the safest, most operationally efficient, and most cost-effective alignment alternative.

In addition, the three alternatives provided by the commenter are in conflict with the long-term vision for development of Airport facilities. As shown in the Master Plan, the ultimate development of the Airport would include a series of parallel passenger concourses south of the proposed new Concourse B. Each of the three alternatives provided by the commenter would result in the construction and implementation of facilities at the Airport that would need to be replaced in the future to accommodate the construction of additional facilities needed for future growth. This approach of creating temporary facilities is not financially prudent.

As a result, none of the three alternatives provided by the commenter would be considered practical and feasible to implement as described in Sections 2.3 and 2.5. Therefore, no revisions to the EA are warranted.

26. The commenter’s statements regarding excerpts from FAA Order 5050.4B are acknowledged.
27. As stated in the response to comment #14 of this comment submission, after completion of the Master Plan, the Department of Aviation conducted significant additional technical discussions with FAA Air Traffic Control, during which the parties noted that the Master Plan taxiway configuration would involve aircraft transiting areas known as “non-movement areas,” which are not under control of FAA. This could cause aircraft delays and potentially require aircraft to be escorted by ground vehicles while in the non-movement area. As a result, the Department of Aviation concluded that two midfield taxiways are essential for safety and efficiency reasons.
28. Eighteen departures per day at the South Terminal was used for modeling the noise impacts associated with the No Action Alternative. This number of

departures was used because it is the maximum number of operations that can occur at the South Terminal under its current configuration.

29. As stated in Section 2.2, Alternative 1 describes maximizing the BJT and expanding the passenger processor (head house) to the northwest. However, as described in Section 2.4.1, Alternative 1 would not meet the purpose and need of the Proposed Project and was eliminated from further consideration.
30. As stated in Section 2.2, Alternative 2 would expand the BJT to the northwest before adding a western concourse running in a north-south configuration. This alternative would have some expansion of the head house in the northwest direction, which is similar to Alternative 1. However, this alternative would not meet the purpose and need of the Proposed Project and was eliminated from further consideration.
31. Alternatives 1, 2, and 3 all have higher number of gates compared to the Proposed Project due to the amount of airfield space being utilized. However, the purpose and need is not solely focused on number of gates, but on a combination of needs which required a balanced alternative and not one that had the highest number of gates.
32. With Alternative 3, the requirement for efficient crossfield aircraft movement would remain. Therefore, two midfield taxiways are shown for Alternative 3. This would require the removal of all infrastructure in the vicinity of the proposed midfield taxiways, which would include the demolition of the existing South Terminal. With Alternative 3 there would not be an option to re-orient aircraft parking or make other modifications to allow the South Terminal to remain in operation because the building itself would have to be removed to facilitate the taxiway construction and eventual aircraft operations.
33. Section 2.2 has been revised to indicate that Alternative 4 would require demolition of the South Terminal. In addition, Section 3.13.1.5.2.2 has been revised to identify the impacts to current South Terminal tenants and employees.
34. Timing and connectivity were considered when developing the project list for the EA. No other projects from the 2019 Master Plan are connected to the Proposed Project.
35. Sections 3.2.1 and 3.2.2 provide the details on how the two study areas were determined. With respect to the Environmental Justice analysis, the larger of the two study areas, the General Study Area, was used to determine impacts related to environmental justice populations. As stated in Section 3.2.2, the

General Study Area boundary was based on the Airport's existing 2019 DNL 65 dB noise contour and the boundary lines were squared off to follow natural boundaries and roadways in the Airport vicinity. The General Study Area is the area encompassing the project's potential direct and indirect impacts. No revisions to the study areas are warranted.

36. The legend in Exhibit 3.2-1 has been revised to read "Project Study Area."
37. The FAA, as the lead agency in the preparation of this EA, does not have a requirement in any FAA Order for a detailed construction transportation analysis. In addition, according to FAA order 5050.4B, FAA requires no more than 25 percent level of design to avoid the appearance of being pre-decisional regarding the Proposed Project prior to the completion of the NEPA process. Therefore, detailed construction planning has not yet been developed to a level sufficient to evaluate specific haul routes.
38. As stated in Section 3.4.5.2.2.2, an air quality permit for the new boilers associated with the Central Utility Plant (CUP) would need to be obtained from the Texas Commission on Environmental Quality (TCEQ).
39. Section 5.2.2 of Appendix D presents the methodology for estimating construction emissions, including the use of the Environmental Protection Agency's Motor Vehicle Emissions Simulator (MOVES) model for developing emission factors and the Airport Construction Research Program's Airport Construction Emissions Inventory Tool (ACEIT) model for developing the construction schedule for each activity. Appendix A within Appendix D includes the ACEIT model output, which provides the individual construction equipment including horsepower (HP), load factors, hours of operation, emission factors and emissions and summaries for each year.
40. A discussion of the construction and demolition emissions is presented in Section 3.4.5.2.1 and summarized for each construction year in Table 3.4-3. Section 5.2.8 of Appendix D discusses the Significance Thresholds for Construction and Operational emissions. Table 27 of Appendix D presents the Construction and Operational emissions compared to appropriate *de minimis* significance thresholds. As shown in that table, the construction emissions for each year are below the established *de minimis* thresholds for all pollutants and would not result in a significant air quality impact.
41. The new Central Utility Plant boilers would require Texas Commission on Environmental Quality permitting as they are new stationary sources. New backup generators would be installed to support the new concourse. Backup generators are rarely operated at the Airport. Emergency power generators

and boilers would require permits from the Texas Commission on Environmental Quality.

42. Section 3.4.2, as well as Section 5.1 of Appendix C discusses the regulatory setting and the attainment status of Travis County. A sentence is added to Section 3.4.2 referencing Appendix D as the location where ambient air conditions are presented.
43. Table 3.4-1 presents the EPA National Ambient Air Quality Standards (NAAQS). In addition, a discussion of the NAAQS is provided in Section 3.4.2 as well as in Section 5.1 of Appendix D.
44. The EA is a document intended for a general audience and not a technical report; therefore, scientific names were not included in the main body of the EA.
45. A footnote regarding the milkweed genus has been added to Section 3.5.2.1.
46. Bird Conservation Regions were developed by NABCI and used by USFWS in the 2021 Birds of Conservation Concern report. The USFWS website was redeveloped after the draft publication of this EA, and the report URL has been corrected.
47. Section 3.5.2.2 has been revised to state that IPaC was used to evaluate the Project Study Area.
48. Section 3.5.2.2 has been revised to clarify the discussion of habitat location for species of federal concern and to add a reference to the Ecological Mapping System of Texas.
49. Section 3.5.2.2 has been revised to clarify that the Whooping Crane has potential stopover habitat within the Project Study Area.
50. The legend in Exhibit 3.5-1 has been revised to read "Project Study Area."
51. The Monarch Butterfly is not federally listed as endangered or threatened. Following USFWS protocol, the USFWS has not been contacted to determine if the Proposed Project would be likely to jeopardize the continued existence of the species. Section 3.5.6 has been revised to include landscaping for Monarch Butterfly habitat.
52. Section 3.5.6 has been revised to include pollinator conservation and management.

53. Section 3.5.6 has been revised to clarify and incorporate the recommendations of Texas Parks and Wildlife Department (TPWD).
54. Approximately 90% of the Project Study Area is located in a highly disturbed and maintained portions of the Airport. The Proposed Project would have no effect on the continued implementation of the Wildlife Hazard Management Plan at AUS.
55. The City of Austin's Climate Equity Plan is discussed in Section 3.6.6 and its application to the Airport is summarized in Table 3.6-3.
56. The discussion on the City's Climate Equity Plan has been moved to Section 3.6.2. In addition, to accompany this text, Table 3.6-3 in the Draft EA has been moved and is now labeled as Table 3.6-1.
57. Section 3.6.5.1 has been revised to indicate that Appendix D includes the output data used for climate modeling.
58. As stated in the title of Table 3.6-1 (which is now labeled Table 3.6-2), the information contained in this table is related to aircraft operations and not construction. Thus, the commenter's suggestion to add the word "Construction" in the heading titled "Activity" is not correct. To further clarify the table, that heading in the newly labeled Table 3.6-2 is revised from "Activity" to "Alternative".
59. Section 3.6.2 presents the sources of greenhouse gases (GHG) in the United States by sector. For example, it is estimated that 19% of GHG emissions in the United States are from the transportation sector. Construction activities do not account for a significant source of GHG emissions.
60. Table 3.6-3 (now labeled as Table 3.6-1) summarizes the Climate Equity Plan's applicability to the Airport. The GHG Reduction Programs are on-going efforts that reduce GHG emissions from all Airport activities, including those initiated by the Proposed Project.
61. The commenter is correct in noting that Exhibit 3.7-1 is after the start of Section 3.8. This was necessary because this exhibit is an 11-inch by 17-inch exhibit and must start on a right-side page. No revisions to the EA are warranted.
62. The Bergstrom Air Force Base (BAFB) is listed in the Resource Conservation and Recovery Act (RCRA) Database. Section 3.8.2.1 is revised to include this information.

63. As stated in Section 3.8.5.2, the information related to deed restricted areas would be shared with the design and construction teams to ensure workers are protected and proper measures are taken in the event any hazardous materials are disturbed.
64. As stated in Section 3.8.5.2, the Proposed Project would not disturb any areas known to contain hazardous materials, including Solid Waste Management Unit 76.
65. AUS does contain seven (7) landfills created during the Air Force's operations at Bergstrom Air Force Base. Those landfills, which are not being used, are closed and have on-going monitoring conducted by the Department of the Air Force.
66. According to FAA Order 5050.4B, FAA requires no more than a 25 percent level of design to avoid the appearance of being pre-decisional in regards to the Proposed Project prior to completion of the NEPA process.¹ As a result, estimates of amount of waste that would be recycled is not possible. Per City of Austin regulations, the Proposed Project would recycle as much of the construction waste as possible. However, FAA does not require construction waste recycling, but it is encouraged.
67. The deed restricted areas would be shared with the design teams to avoid these areas as much as possible.
68. The hazardous materials survey and abatement plan for any asbestos found in affected buildings was completed in December 2021. Section 3.8.2.1 has been revised to include this information.
69. The assertions made by the commenter appear to be associated with guidance in FAA Order 1050.1F related to the preparation of a Categorical Exclusion for remediation of hazardous wastes. The Proposed Project is analyzed in an EA and the guidance associated with this Categorical Exclusion is not warranted.
70. A new Exhibit 3.9-1 showing the Areas of Potential Effect is included in the EA.
71. The footnote referencing that the FAA and the Texas SHPO concurred that no above-ground historic architectural resources are in the direct or indirect

¹ FAA. (2006, April 28). Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, Section 1004c.

APEs has been revised. Correspondence from the Texas Historical Commission has been included in Appendix I.

72. Exhibit 3.10-2 has been revised to show the overlay zones in different colors.
73. As stated in Section 3.10.5.2, the Proposed Project would occur entirely on Airport property. Therefore, none of the project components are within any of the three airport overlay zones. No revisions to the EA are warranted.
74. The commenter's suggestion that other environmental resource areas associated with land use be cross-referenced was completed as part of Section 3.10.5.2. No revisions to the EA are warranted.
75. The EA has been revised to include a reference to Exhibit 1-8 in Section 3.11.5.2.
76. As stated in Section 2.2, the No Action Alternative would accommodate about 10.5 percent fewer passenger enplanements than the Proposed Project. This would equate to about 4.4 percent more aircraft operations under the Proposed Project compared to the No Action Alternative. The commenter's characterization of this increase as significant is not correct. No revisions to the EA are warranted.
77. FAA environmental orders do not require construction-related noise analyses; thus, FAA does not have a significance threshold for construction noise. The closest noise-sensitive land uses to locations where construction would occur with the Proposed Project are the residences on the west side of U.S. Highway 183. These noise-sensitive land uses are 1,250 feet from Project Components A-4 (Runway 18R-36L Rapid Exit Taxiways) and A-6 (Demolition of Airfield Pavement). Given the distance from areas on the Airport where construction would occur and the nearest noise-sensitive land use, noise associated with construction activities would be attenuated to less than 65 dB Lmax (which is the highest sound level for a single event). For example, the noisiest construction equipment (i.e., the jackhammer) would attenuate to 62 dB Lmax at 1,250 feet. In addition, construction noise is intermittent and would only occur during daytime hours. As a result, no impacts related to construction noise would occur with the implementation of the Proposed Project.
78. Section 3.12 has been revised to provide identification of acronyms used in the noise analysis.
79. Section 3.12.2 has been revised to indicate that an explanation of noise metrics is provided in Appendix D.

80. The third sentence of paragraph 3 of Section 3.12.5 is revised to read: "The analysis also shows a less than 1.5 dB increase in DNL as a result of the 2032 Proposed Project compared to the NO Action Alternative."
81. Data on the block group level from the 2020 U.S. Census has not been released. The data provided in the EA is the most recent available data that can be used for the analysis. No revisions to the EA are warranted.
82. Section 3.13.1.5.2.2 has been revised to identify the impacts to current South Terminal tenants and employees.
83. The commenter acknowledges that FAA has not established a significance threshold for socioeconomics but references the factors identified in FAA Order 1050.1F Desk Reference including actions that may cause "extensive relocation of community businesses that would cause severe economic hardship for affected communities". However, the excerpt cited by the commenter is taken out of context. Citing the federal regulations, FAA Order 1050.1F Desk Reference explicitly states that such factors are only appropriate to consider "if they are interrelated with natural or physical environmental impacts". The Council on Environmental Quality (CEQ) regulations make clear that "economic or social effects are not intended by themselves to require preparation of an environmental impact statement" (40 CFR § 1508.14). Rather, it is only when the economic or social and natural or physical environmental effects are interrelated that this analysis is mandated. While there may be impacts to specific businesses operating at the South Terminal, these impacts do not rise to the level of extensive relocations that would create impacts to the natural or physical environment.
84. FAA Order 1050.1F does not require the reporting of employment at an Airport. The FAA order 1050.1F Desk Reference recommends reporting unemployment rate within the geographic area in which a project is proposed. Section 3.13.1.2.2 provides that information. As stated in Section 3.13.1.5.2.2, the Proposed Project would positively affect employment by creating a temporary demand for construction employment and a permanent demand to serve the increase in passengers at the Airport.
85. Section 3.13.1.5.2.2 has been revised to identify the impacts to current South Terminal tenants and employees.
86. Section 3.13.1.5.2.2 has been revised to identify the impacts to current South Terminal tenants and employees. In addition, Section 3.13.1.5.2.1 has been revised to avoid any confusion regarding impacts to businesses.

87. Impacts to employment are addressed in Section 3.13.1.5.2.2. Section 3.13.1.5.2.1 of the EA has been amended to avoid any confusion regarding impacts to businesses.
88. The commenter's assertion that surface traffic was not grown for the South Terminal is not correct. As stated in Section 3.13.2.2, traffic was not grown using passenger data, but rather using the background traffic factor. This was done because the South Terminal was under renovation at the time, so passenger data was not a reasonable metric to use to grow the traffic.
89. The Proposed Project would result in the removal of the South Terminal. Therefore, access for passenger-related surface traffic to the South Terminal would not occur once the new concourse is operational. Thus, surface traffic currently using the South Terminal would use the existing entry points for at Spirit of Texas Drive and Presidential Boulevard. This shift in surface traffic is accounted for when calculating the growth factor for future scenarios as it takes into account the enplanement data.
90. The improvements to SH 71 and Spirit of Texas Drive are previously approved projects being completed by TxDOT.
91. FAA Order 1050.1F does not specifically require analysis of the temporary traffic effects of construction activity. Because construction traffic would be intermittent and would not occur during peak hours, the construction traffic resulting from the Proposed Project would not disrupt local traffic patterns nor substantially reduce the levels of service on roads around the Airport.
92. The improvement in the level of service at the intersection of Emma Browning Avenue and Burleson Road is due to the shift in traffic from the South Terminal to the Barbara Jordan Terminal that would occur with the removal of the South Terminal.
93. Section 3.13.3.1 references Appendix C for the regulations associated with environmental justice. In addition, Section 3.13.3.3 does indicate that the purpose of the environmental justice analysis is to determine whether a significant impact would have the potential to disproportionately affect a low-income or minority population. No revisions to the EA are warranted.
94. No FAA policy or regulation, or other guidance requires the use of block group level data for environmental justice analysis. As shown in Table 3.13-6, the low-income and minority populations were provided for the Project Study Area and the General Study Area, as well as the City of Austin and Travis County. In accordance with FAA Order 1050.1F, the various sizes of Census data available allow project developers to choose the most

appropriate data for the specific study area identified in the NEPA evaluation. No revisions to the EA are warranted.

95. The commenter is correct in noting that census tracts that have a population of 50 percent or more exceeding the poverty guideline constitutes a low-income environmental justice community and census tracts that have a population of 50 percent or more exceeding the minority guideline constitutes a minority environmental justice community. As stated in Section 3.13.3.4, these guidelines were used for determining environmental justice populations in the Airport vicinity.
96. The EA followed the guidance provided by the FAA regarding the identification of environmental justice populations. As stated in the response to comment 94 of this comment submission, no FAA policy or regulation, or other guidance requires the use of block group level data for environmental justice analysis. No revisions to the EA are warranted.
97. As stated in Section 3.13.3.5.2, no significant impacts would occur as a result of the Proposed Project compared to the No Action Alternative. As a result, no disproportionately high or adverse effects to environmental justice populations would occur. No revisions to the EA are warranted.
98. Text in the EA has been modified to identify the resource as the National Wetlands Inventory.
99. Exhibit 3.14-2 has been changed from "Figure 3.14-2" to "Exhibit 3.14-2".
100. Section 3.14.1.2 has been revised to clarify the location and type of wetlands at AUS.
101. Section 3.14.1.2 has been revised to clarify the information obtained during the completed field surveys.
102. Section 3.14.1.4 has been revised to clarify the use of the USACE Wetland Delineation Manual.
103. Section 3.14.1.4 has been revised to clarify the use of the recommended routine method of wetland delineation that was performed for the EA. As a result, the statement that no impacts to wetlands would occur as a result of the Proposed Project is correct.
104. Section 404 of the Clean Water Act regulates the placement of dredge or fill material within waters of the United States and does not pertain to runoff from facilities or construction activities. Section 401 of the Clean Water Act

regulates discharges to waters of the United States from runoff. As stated in Section 3.14.3.5.2, the permitting process of the Texas Pollution Discharge Elimination System (TPDES) and the City's site development permit process would require implementation of measures related to runoff.

105. Section 3.14.1.6 has been revised to identify erosion and sedimentation controls and other best management practices to minimize indirect impacts to wetlands.
106. Section 3.14.3.2 has been revised to include the Colorado River as a perennial stream in the vicinity of AUS.
107. Appendix I contains a full record of the agencies and persons consulted as part of the preparation of the EA. Documentation of discussions regarding individual lease agreements and negotiations is not required under the National Environmental Policy Act.
108. Chapter 4 has been revised to include the public outreach efforts that occurred during the 45-day review period of the Draft EA, the public meetings that were held during that 45-day review period, and all comments received during that 45-day review period.
109. The legend in Exhibit 3.2-1 has been revised to read "Project Study Area."
110. The legend in Exhibit 3.5-1 has been revised to read "Project Study Area."
111. The legend in Exhibit 3.13-1 has been revised to read "Project Study Area."
112. Exhibit 3.14-1 has been changed from "Figure 3.14-1" to "Exhibit 3.14-1".
113. The title of Exhibit 3.14-1 has been revised to read "Wetlands in Vicinity of Project Study Area".
114. Exhibit 3.14-2 has been changed from "Figure 3.14-2" to "Exhibit 3.14-2".
115. Exhibit 3.14-3 has been changed from "Figure 3.14-3" to "Exhibit 3.14-3".
116. The legend in Exhibit 3.14-3 has been revised to read "Project Study Area." In addition, the title of Exhibit 3.14-3 has been revised to read "Floodplains in Vicinity of Project Study Area".
117. The commenter is correct in noting that the relocation of Taxiways H and J are not the same project as that depicted in the Master Plan. The Proposed Project uses the concepts in the Master Plan and takes a re-strategized

approach at implementing key components of the Master Plan. As noted previously, additional planning and coordination with FAA Air Traffic Control derived the most safe and efficient locations for the crossfield taxiways. No revisions to the EA are warranted.

118. Appendix C provides the regulations that apply to the AEDP. The definitions referred to by the commenter are part of the regulations. No revisions to the EA are warranted.
119. See the response to comment #39 of this comment submission.
120. Section 3.5.6 has been revised to include landscaping for Monarch Butterfly habitat and pollinator conservation and management.
121. As stated in Section 3.5.1, TPWD provided a letter with general construction and design recommendations. Section 3.5.6 indicates that the City would implement these TPWD recommendations.
122. This comment repeats the table of contents of Appendix F. No revisions to the EA are warranted.
123. Direct impacts would occur only within the Project Study Area. Therefore, a query of the IPaC for the General Study Area is not appropriate for the Proposed Project.
124. It is acknowledged that the commenter has no comments on Appendix G. No revisions to the EA are warranted.
125. FAA Order 1050.1F does not specifically require analysis of the temporary traffic effects of construction activity. Because construction traffic would be intermittent and would not occur during peak hours, the construction traffic resulting from the Proposed Project would not disrupt local traffic patterns nor substantially reduce the levels of service on roads around the Airport.

The information contained in Appendix H is summarized and presented in Tables 3.13-3, 3.13-4, and 3.13-5.

126. Appendix I has been revised to include additional documentation regarding coordination with other agencies regarding the Proposed Project.
127. The correspondence provided in Appendix I was part of consultation efforts with these other agencies and does not require responses to comments contained in the correspondence. The EA was written to reflect the comments and recommendations contained in the correspondence.

128. Appendix J has been added to the EA to document all public outreach efforts that have occurred associated with the 45-day review period of the Draft EA.

Commenter P-1
Anonymous

X

1

Response to Commenter P-1

1. The commenter has not provided any specific comment on the Draft EA.

Commenter P-2**Bobs**

I live near the airport and I don't want that new fuel expansion. Put that shit in Westlake. Austin decade after decade puts the nasty shit on the other side of town. The only people who even use the airport already have disposable income. DO NOT EXPAND FUEL in Southwest Austin. None of the people who stand to profit from this expansion live in the area that will be affected when that thing leaks or blows up. Please stop. This is not wanted. Anybody you talk to who understands the danger will say no.

1

Response to P-2

1. The commenter's opposition to the fuel storage facility is acknowledged. However, the expansion of the fuel storage facility is a separate action and is not included in the Proposed Project. The fuel storage facility was the subject of a separate EA that was approved in 2020.

**Commenter P-3
Brandon**

Build it all now.

1

Response to Commenter P-3

1. The commenter's statement to construct the Proposed Project is acknowledged.

**Commenter P-4
Edgar**

While I live quite far from the proposed expansion, I'm concerned with the tax burden that the proposed expansion will imposed on the residents of that area. The trend will continue of displacing long-established residents. I hope there would be plans in placed to mitigate the financial burden that the local residents may benefit from. Thanks

1

Response to Commenter P-4

1. All DOA projects are funded through FAA grants or airport revenue. As a result, no local tax burden falls on the public.

**Commenter P-5
Bertha Rendo Delgado**



COMMENT FORM

**Austin-Bergstrom International Airport
Airport Expansion and Development Program
Draft Environmental Assessment (EA)
Comment Form**

An Environmental Assessment (EA) for the Proposed Airport Expansion and Development Program (AEDP) at Austin-Bergstrom International Airport has been prepared. To provide comments on the Draft EA, please fill out this form and submit to: Austin-Bergstrom International Airport, ATTN: Environmental Affairs Division, 2716 Spirit of Texas Drive, Austin, Texas 78719.

Comments:

We are concerned of our neighborhoods that surround the airport on certain issues. As long as the City ABIA knows not to use gas that was used 30 years ago and the that claims, we want to make sure that no harm is done to our people. I have sent a explanation today on the facts of the project and hope to come with a solution to protect our people and also be able to communicate facts by educating our community. We need to make sure that we work together in our community and our residents are heard and assisted. Thank you for today's workshop! Si se puede

1

Comments are not limited to this form. Please attach any additional sheets as necessary.

Name: Bertha Rendo Delgado
Address: 2008 Haskell St.
City, State, Zip: Austin, TX 78702
Email: maricodelgado267@yahoo.com

Comments on the scope of the EA will be accepted until 5:00pm Central Daylight Time on April 7, 2022.

Before including your name, address, e-mail address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Response to Commenter P-5

1. Comment noted. As stated under **Section 3.8.5.2**, there are no significant impacts related to hazardous and solid waste. The Airport implements Best Management Practices (BMPs) to address pollution prevention initiatives, and the Proposed Project would not disturb any areas known to contain hazardous materials. All hazardous waste generated during construction and operation of the Proposed Project would be managed and disposed of in compliance with federal, state, and local hazardous materials management guidelines.

Commenter P-6
Jo Hamiltin

I, and my neighbors in the Colorado Crossing subdivision, are concerned that the plans to store spent jet fuel adjacent to our community pose an environmental risk.

1

Response to Commenter P-6

1. As described in **Section 3.8.5.2**, all fueling operations would be performed in compliance with federal, state, and local hazardous materials guidelines and would not be considered a significant impact.

Commenter P-7
Susan Pantell

I. Climate Change Emissions

The AUS EA does not adequately assess the impacts to climate change from the proposed airport expansion project because it does not include the greenhouse gas emissions from the airplane travel that will result from the airport expansion. Although the law does not require that the FAA consider those emissions, that is a serious flaw in this EA.

It is not adequate to only consider the climate change impacts from the on-the-ground airport activities, when the more significant and long-lasting impacts will be from the increase in air travel. Airport expansions are happening around the country, and none of the NEPA documents associated with those projects take into account the increased climate change emissions from all of the added air travel. Because of that omission, significant amounts of additional climate change emissions are being ignored. It is estimated that the percentage contribution of air travel to climate change emissions will triple by 2050 [[Fact Sheet from the Environmental and Energy Study Institute](#)]. It is irresponsible to ignore these impacts in the AUS Environmental Assessment.

1

The AUS EA states in the first chapter that the planned expansion of airport facilities is not correlated with increased airplane travel. The FAA bases the need for airport expansions on its projections of future airline travel; and when the expansions are built, they allow for additional air travel. By relying on the projections of increased air travel, the FAA is creating a self-fulfilling prophecy instead of helping to lead the country in a better direction. As a nation, we should set policies to reduce air travel over the long term to reduce climate change emissions and replace it with options like high speed rail and meetings on the internet. That would lower the FAA projections of future air travel and reduce the need for airport expansions.

2

The statement that the proposed project will not result in increased air travel is also flawed because the proposed project is part of the larger 2040 Master Plan, which is designed to facilitate continued growth. It is not right to separate out one project and say that it will not result in an increase in air travel. Without each expansion project, the continued growth in air travel would be limited.

3

Airport expansions are happening around the country, and even though many cities and states have climate change reduction goals, the emission estimates do not include the emissions from airplane travel. The city of Austin's Climate Equity Plan sets a goal of net zero climate change emissions by 2040. It does not include the

4



additional emissions that will be caused by the expansion of the airport, which will detract from achieving that goal.

4

II. Air Quality

Regarding the air quality emissions, the EA shows that the projected 2032 NO2 emissions exceed the EPA standards, but it says that is not a problem because Travis County is in attainment. NOx pollutants are ozone precursors; and although Travis County is currently in attainment, it has come very close to ozone non-attainment during the summer months. The county should do everything possible to not exceed attainment levels, and the proposed airport project would contribute toward non-attainment and potentially push the county over the threshold. The projection only goes to 2032, and emissions from the project are likely to increase in later years. Therefore, the assessment of air quality impacts is not adequate.

5

III. Environmental Justice

The consideration of environmental justice impacts is inadequate. Even if the noise and air quality impacts will not exceed the regulatory requirements within the small areas that are designated in the EA, there will be added noise and air pollutants in the flight path to the airport that will adversely impact the people who live in those areas, many of whom are minority populations. Even if the thresholds that are set in the law are not exceeded, common sense will tell you that there is a disproportionate burden on people of color and lower income people.

6

The location of the jet fuel tank farm is another environmental justice issue that has not been adequately addressed by the airport staff. I did not see it discussed in the EA, and it should be included. See [this article](#) about concerns from the community.

7

IV. Public Involvement

The public involvement efforts have not been adequate. The law may require that public notice only be posted in one print newspaper in the city, but that is clearly not sufficient in an age when newspaper subscriptions have gone way down; only a small percentage of the population was reached that way. The Department of Aviation only received eight comments on their proposals in September-October of 2021, and that is clearly inadequate in an area with a population of over a million.

8

The city of Austin has not held any public meetings in recent years on the pros and cons of the larger plans to expand the airport, and so has not received public feedback on that.

9

For the reasons discussed above, the Draft AUS Environmental Assessment is inadequate and incomplete. I oppose the proposed project and support the No

10



Response to Commenter P-7

1. The climate impacts were conducted consistent with the FAA guidelines². Fuel usage and CO₂ equivalent emissions were estimated for the construction and airport operations for the No Action Alternative and the Proposed Project and are presented in Section 3.6.5. As stated in Section 3.6.5.1, the Proposed Project would comprise a very small fraction of the GHG emissions in the Austin-Round Rock-San Marcos Metropolitan Statistical Area (MSA). Mitigation measures are discussed in Section 3.6.6.
2. The commenter's assertion that policies should be set to reduce air travel over the long term is acknowledged. The EA was prepared to respond to the forecast increase in passenger enplanements at AUS. Table 1-4 and Exhibit 1-7 provide the information used in identifying this forecast increase in passenger enplanements.
3. As stated in Section 1.3.2, there are four independent needs that affect the future ability of AUS to maintain its essential function as the primary commercial service airport in Central Texas. One of those four needs is the insufficient passenger processing facilities and gates to accommodate the forecast enplanements. Thus, the Proposed Project is intended to accommodate the forecast increase in passenger enplanements.
4. See the response to comment #1 of this comment submission.
5. The air quality impacts were conducted consistent with the FAA guidelines. Travis County is in attainment of EPA's NAAQS for all criteria pollutants, therefore the 100-ton *de minimis* threshold for NO_x emissions (which is the *de minimis* threshold for areas designated as maintenance by EPA) was used in lieu of an attainment area threshold for determining a significant impact for NEPA and indicates estimated net change in emissions may or may not exceed the standard. The Airport is committed to mitigation as described in Section 3.4.6.

² FAA Order 1050.1F Desk Reference, https://www.faa.gov/about/office_org/headquarters_offices/apl/enviro_policy_guidance/policy/faq_nepa_order/desk_ref/media/3-climate.pdf

6. The EA followed the guidance provided by the FAA regarding the identification of environmental justice populations. As stated in Section 3.13.3.5.2, no significant impacts would occur as a result of the Proposed Project compared to the No Action Alternative. As a result, no disproportionately high or adverse effects to environmental justice populations would occur. For airport projects that do not include airspace or procedure actions, analyzing noise and air impacts above 3,000 feet is not required. No revisions to the EA are warranted.
7. The Proposed Project does not include the expansion of the fuel storage facility. A separate EA, which was approved in 2020, was prepared for the fuel storage facility.
8. The public outreach associated with this EA exceeded the requirements established by the FAA. For an overview of all of the public outreach efforts, see **Appendix J**.
9. AUS has conducted numerous public meetings during the Master Plan process from 2017 to 2019, in addition to updates given to City Council as well as the Airport Advisory Commission. For this EA, AUS held a public scoping meeting in September 2021 and two public meetings in March 2022, in addition to several notices and updates being sent out to the community and stakeholders.
10. The commenter's support for the No Action Alternative is noted.

Commenter P-8
Alex S

The CapMetro airport light rail line terminal does not appear to be depicted as a part of the current master plan or alternatives. The rail terminus must be very close to the terminal facilities in order to make it an attractive option and decrease reliance on passenger vehicles. Where does light rail fit into the airport's long term plan? Will the current plans be revised to ensure light rail is well integrated into the planned departure/arrival facilities?

1

Response to Commenter P-8

1. As described in **Table 3.6-3**, the light rail project is still in the planning phase, so the level of detail to determine where it would connect to the Airport or how the project would fit into the Airport's Master Plan has not been determined. However, the Project Connect Blue Line would connect downtown with the Airport.

Commenter P-9**Alex S**

The existing airport-operated parking lots filled up over the winter holidays in 2021. What is the plan to increase the supply of parking spaces alongside increased passenger demand and the demolition of the red garage?

1

Response to Commenter P-9

1. As stated in **Section 1.3** of the Draft EA, the purpose for the Proposed Project is to provide facilities to accommodate forecasted enplanements at an adequate level of service. **Section 1.4.3** lists the proposed terminal projects, including Project T-6, which would be the construction of a pedestrian bridge to the existing consolidated rental car facility (CONRAC) and a new parking garage.

Commenter P-10**Alex S**

The current volume of air traffic using the airport often creates hazards for slower aircraft, which are asked by air traffic control to keep their airspeed significantly above that which is considered stable for a normal approach to landing in order to accommodate faster moving airline traffic. How will the airport ensure that business and general aviation aircraft operations are not negatively impacted as a result of increased air carrier traffic?

1

Response to Commenter P-10

1. The ability of the Airport to accommodate air carrier, cargo, military, and general aviation operates is a function of the number of runways and configuration of the runways system, air traffic operational procedures, and supporting navigational aids. As stated in **Section 1.3.2.4**, a purpose for the Proposed Project is to maintain efficient movement area access between the east and west airfields. Relocation of Taxiways H and J would ensure that access within the aircraft movement area between the east and west airfields is maintained and allow for aircraft to use either runway as required by air traffic control.

Commenter P-11

Alex S

Vehicular traffic in the current departure and arrival lanes is made congested partially as a result of pedestrian crossings. Will the new departure/arrival lanes be separated from pedestrian crossings?

1

Response to Commenter P-11

1. As listed under **Section 1.4.3**, one of the proposed project components is Project T-6, which is the construction of a pedestrian bridge between the new/expanded arrival/departure hall (Project T-5) and the existing consolidated rental car facility (CONRAC) and parking garage.

Commenter P-12**Alex S**

Will the pedestrian bridge to the parking facilities include moving walkways to improve mobility and access to parking structures?

1

Response to Commenter P-12

1. According to FAA Order 5050.4B, FAA requires no more than a 25 percent level of design to avoid the appearance of being pre-decisional in regard to the Proposed Project prior to completion of the NEPA process.³ The proposed pedestrian bridge has not been designed at a level to determine the inclusion of accessibility amenities, like moving walkways. That level of detail, which is not required to evaluate and disclose the environmental impacts of the Proposed Project under NEPA, will occur as part of the final design of the proposed pedestrian bridge.

³ FAA. (2006, April 28). Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, Section 1004c.

Commenter P-13**Alex S**

The current departure and arrival passenger vehicle lanes are deficient and congested. How will the new departure and arrival lanes address congestion during peak hours?

1

Response to Commenter P-13

1. As described under **Section 1.4.4**, the existing access road network would be upgraded and a new terminal curbside roadway would be constructed on both the arrival and departure levels of the new/ expanded arrival/departure halls. These project components would allow for better vehicular access to the new/expanded arrival/departure hall.

As stated under **Section 3.13.2.4**, there are no significant impacts expected to occur under the Proposed Project compared to the No Action Alternative. It is projected that surface traffic would improve based on the Airport working with the City of Austin and TxDOT to identify future roadway and/or signalization improvements at the SH 71 intersections with Spirit Texas Drive and Presidential Boulevard and the provision of light rail to the Airport. The light rail project has been approved by the City of Austin and is currently undergoing environmental evaluation.

**Commenter P-14
Rita Ann Supeda Soiz**



COMMENT FORM

**Austin-Bergstrom International Airpo
Airport Expansion and Development Prog
Draft Environmental Assessment (EA
Comment Form**

An Environmental Assessment (EA) for the Proposed Airpo
Development Program (AEDP) at Austin-Bergstrom Internatio
prepared. To provide comments on the Draft EA, please fill out th
Austin-Bergstrom International Airport, ATTN: Environmental
Spirit of Texas Drive, Austin, Texas 78719.

Comments:

I would like to acknowledge
each and every representative of
the Airport's Expansion Development
Program. I came in person and got
to get all of concerns answered. It
was a privilege to meet Brian Zins,
Dave ^{Co. To} Hill and Kane Carpenter, who by the
way has gotten more gray hair. - Mr. Santiago
was very open & knowledgeable. All of
the representatives were very welcoming
up front and very transparent. It was
truly refreshing to be able to look
them in the eye and communicate
with everyone - thanks for answering all
questions & concerns.

1

Comments are not limited to this form. Please attach any additional sheets as necessary.

Name: Rita Ann Supeda Soiz
Address: 6209 Merriwood Lane
City, State, Zip: Austin, Tx. 78745
Email: _____

Comments on the scope of the EA will be accepted until 5:00pm Central Daylight Time on April 7, 2022.

Before including your name, address, e-mail address, or other personal identifying information in your comment, be advised that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Response to Commenter P-14

1. The comments regarding the public meeting are acknowledged.

Commenter P-15
SouthAustinRules

Dear Powers that Be, I live near the airport and I don't want that new fuel expansion near my home. You wouldn't either. Nobody needs a giant tank of jet fuel near their home. Put that shit in the rich part of town. Austin decade after decade puts the nasty shit on the poor side of town. There are too many people moving here generally speaking, and the basic services are suffering. The government should invest in water infrastructure, not expanding the airport. What good is it going to do to have more people move here? We (the city/state) can't even keep shit out of our drinking water. Homelessness is rampant. And rich posers and their condo-lifestyles are ruining the vibe of our city. The only people who even use the airport already have disposable income. DO NOT EXPAND FUEL in Southwest Austin. None of the people who stand to profit from this expansion live in the area that will be affected when that thing leaks or blows up. Please stop. This is not wanted, except by people who are already rich and don't live anywhere near here.

1

Response to Commenter P-15

1. The commenter's opposition to the fuel storage facility is acknowledged. However, the expansion of the fuel storage facility is a separate action and is not included in the Proposed Project. The fuel storage facility was the subject of a separate EA that was approved in 2020.

Commenter P-16
SouthAustinRules

I live near the airport and I don't want that new fuel expansion. Nobody needs a giant tank of jet fuel near their home. Put that shit in the rich part of town. Austin decade after decade puts the nasty shit on the poor side of town. There are too many people moving here generally speaking, and the basic services are suffering. The government should invest in water infrastructure, not expanding the airport. What good is it going to do to have more people move here? We (the city/state) can't even keep shit out of our drinking water. Homelessness is rampant. And rich posers and their condo-lifestyles are ruining the vibe of our city. The only people who even use the airport already have disposable income. DO NOT EXPAND FUEL in SouthEAST Austin. None of the people who stand to profit from this expansion live in the area that will be affected when that thing leaks or blows up. Please stop. This is not wanted, except by people who are already rich and don't live anywhere near here.

1

Response to Commenter P-16

1. The commenter's opposition to the fuel storage facility is acknowledged. However, the expansion of the fuel storage facility is a separate action and is not included in the Proposed Project. The fuel storage facility was the subject of a separate EA that was approved in 2020.

Commenter P-17
SouthAustinRules

I live near the airport and I don't want that new fuel expansion. Put that shit in the rich part of town. Decade after decade, Austin puts the nasty shit on the poor side of town. There are too many people moving here generally speaking, and the basic services are suffering. The government should invest in water infrastructure, not expanding the airport. What good is it going to do to have more people move here? We (the city/state) can't even keep shit out of our drinking water. Homelessness is rampant. And rich posers and their condo-lifestyles are ruining the vibe of our city. The only people who even use the airport already have disposable income. DO NOT EXPAND THE AIRPORT, and CERTAINLY DO NOT PUT HIGH CAPACITY FUEL STORAGE NEAR PEOPLE WHO WONT EVEN USE THE PLANES. None of the people who stand to profit from this expansion live in the area that will be affected when that thing leaks or blows up. Please stop. This is not wanted, except by people who are already rich and don't live anywhere near here.

1

Response to Commenter P-17

1. The commenter's opposition to the fuel storage facility is acknowledged. However, the expansion of the fuel storage facility is a separate action and is not included in the Proposed Project. The fuel storage facility was the subject of a separate EA that was approved in 2020.

Commenter P-18
Triguy

I believe any new construction should be energy neutral or even better, energy positive. There should be included sufficient solar/wind generation to not only cover the energy needs of the new development but also to retroactively cover the entire energy expenditure of the whole airport. Given the amount of available surface area of building and parking there should be extra capacity built in to support AE community solar subscriptions

1

Response to Commenter P-18

1. The commenter's suggestions regarding new construction being energy neutral is acknowledged.

Commenter P-19
Howard Yancy

There is no mention whatsoever of the environmental impacts of the relocation of the jet fuel tank farm; has there been any environmental assessment of the relocation of the jet fuel tank farm somewhere else?

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Response to Commenter P-19

1. The expansion of the fuel storage facility is a separate action and is not included in the Proposed Project. The fuel storage facility was the subject of a separate EA that was approved in 2020. The Fuel Farm EA and Finding of No Significant Impact can be found on the website Airport Project | SpeakUp Austin!.

K.4 MEMORANDUM TO MAYOR AND CITY COUNCIL DATED JULY 13, 2021



MEMORANDUM

TO: Mayor and City Council

CC: Spencer Cronk, City Manager
Gina Fiandaca, Assistant City Manager *Jacqueline Yaft*

FROM: Jacqueline Yaft, Chief Executive Officer, Department of Aviation

DATE: July 13, 2021

SUBJECT: Airport Expansion and Development Program Update at Austin-Bergstrom International Airport

The purpose of this memo is to update you on the status of the Airport Expansion and Development Program (AEDP) at Austin-Bergstrom International Airport (AUS) and some of the impacts of the AEDP on current AUS operations.

Airport Expansion and Development Plan

Today the Department of Aviation (Aviation) issued a press release announcing the launch of the AEDP. As AUS continues to experience a rebound in passenger activity levels, the AEDP will be scalable to meet a range of forecasted growth profiles and provides a foundation for long-range growth and development.

The indicative rendering of the AEDP Elements is shown on the attachment and include:

- Optimization of the Barbara Jordan Terminal
- Enabling airfield and utility work to include building a new Central Utility Plant and removing existing structures to prepare for construction activities
- Preparing for a new Midfield Concourse with 10+ new gates and two new taxiways

Based on the advice of independent consultants, the AEDP has been developed and will be implemented to reflect what is in the best interest of the City, the Austin community, the greater Central Texas region, and the airlines to pursue a more operationally modern and cost-efficient facility for all airlines and tenants that will keep pace with the region's growing aviation demand.

The phased approach for the AEDP is designed to support this incremental growth of aviation demand, with a goal to minimize any passenger inconvenience during the construction process. As with any construction program, there will be required changes to facilities and operations AUS as the AEDP is implemented.

Impact to the South Terminal Facility

The new Midfield Concourse B facility will require the relocation of the existing midfield taxiways. Based on the advice of independent consultants, Aviation has determined that the safest, most operationally efficient, and most cost-effective alignment of the future taxiways will require the closure and removal of the South Terminal within approximately the next two years. It is imperative that the South Terminal Facility be removed in a timely manner so that the development of the Midfield Concourse B can be completed in a timeframe to match the forecasted growth of the airlines at AUS.

The South Terminal operations are currently managed by an outside entity, Highstar Capital IV, LP/LoneStar Airport Holdings, LLC. Aviation intends to work with Highstar during a stated transition period to negotiate a fair and amicable result that will allow the City to regain control of the South Terminal facility. The next step in that process is today's issuance of a letter to Highstar notifying them of the City's intent to acquire the South Terminal leasehold interest. Aviation staff intends to brief Council offices about this process in the weeks ahead.

Aviation is committed to conducting this process with full consideration for operating airlines, tenants, employees, and passengers, to wit:

1. All airlines operating from the South Terminal will not experience service interruption and will be accommodated at the Barbara Jordan Terminal.
2. Aviation will coordinate with LoneStar (the operator of the South Terminal) to work directly with the businesses operating at the South Terminal regarding potential opportunities for all employees, service providers, concessionaires, and vendors to mobilize at the Barbara Jordan Terminal or elsewhere at AUS upon closure of the South Terminal, if possible.

Ultra-Low-Cost-Carrier (ULCC) Service

The ULCCs currently operating at the South Terminal specialize in providing affordable service, which is essential to the businesses and population of the greater Central Texas region and ensures healthy competition in the airline market. With the investments of the AEDP, these ULCCs have the potential to increase their capacity and operations at the Barbara Jordan Terminal and future Midfield Concourse B, further ensuring competitive airfares while providing more connections to the region. At the same time, the passengers and employees of the Legacy and Low-Cost Carriers currently at the Barbara Jordan Terminal will not experience a decrease in the service, amenities, and benefits that they have come to expect.

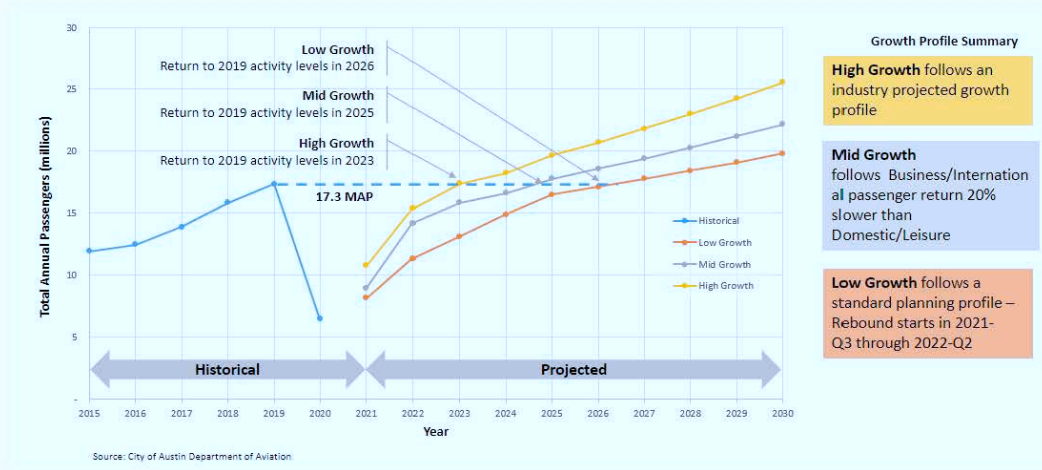
Summary

The long-term plan for AUS is a win for all customers and stakeholders and will ensure the airport is able to keep pace with rising demand for many years to come.

Should you have any questions or need additional information, please do not hesitate to contact me. Thank you for supporting Austin-Bergstrom International Airport.

Airport Expansion and Development Program – Indicative Program Elements





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