

# **Exhibit B**



REPLY TO  
ATTENTION OF

BALTIMORE, MD 21203-1715

June 11, 2001

Operations Division

Subject: Maryland Airport

**RECEIVED**

JUN 21 2001

Mr. John Robinson  
Talbert and Bright, Inc.  
10105 Krause Road, Suite 100  
Chesterfield, Virginia 23832

Dear Mr. Robinson:

This is in reply to your most recent request dated April 24, 2001, as well as previous correspondence in 1999 and 2000, concerning the proposed redevelopment of Maryland Airport in Charles County, Maryland. In particular, you requested concurrence that you have completed the requirements of avoidance and minimization of environmental impacts discussed in previous correspondence as well as in the field. We discussed some of these issues most recently during our field visit on May 15, 2001.

We have reviewed the alternatives analysis based upon the revisions made to "Chapter 3 - Alternatives", of the Environmental Assessment (EA), that accompanied your most recent correspondence, as well as all previous documents pertaining to this file. We appreciate the opportunity to comment on portions of your draft EA.

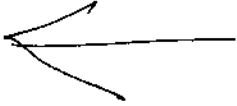
In this alternatives analysis, you have narrowed your scope of review to three alternatives: "Alternative 1 - Sponsor's Proposed Action" (Alt. 1); "Alternative 2 - Change location of Project Elements" (Alt. 2); and "Alternative 3 - Take No Action" (Alt. 3). We agree that Alt. 3 (a.k.a. "Option 1" in Sect. 3.2) serves no benefit to the applicant, nor to the surrounding community, and we look forward to working with you to resolve our environmental concerns so that improvements may proceed with Maryland Airport. However, we disagree with your evaluation of Alt. 1 and Alt. 2, and discuss our reasons below. We do not believe you have met the requirement of avoidance and minimization per our June 22, 2000, letter.

In your summary of environmental impacts contained in Table 3.3-1 of the EA, you indicate that the impact to biotic communities is a minor negative impact for Alt. 1 (a.k.a. "Option 6" in Sect. 3.2). We disagree. We believe that 80-foot high fill in an unnamed tributary to Mattawoman Creek, the 800-foot wide filling, peak to peak, of the 4.2-acre wetland, and the corresponding filling of 900 linear feet of the riparian corridor to

(item 1 of Alt. 1). We expressed our concerns regarding this stream filling in our November 5, 1999 letter. Your March 10, 2000, response indicated "...we can determine if there is an appropriate solution to avoid or mitigate this impact." To date, you have not submitted any avoidance alternatives, nor have you addressed the thermal impact or the loss of floodplain functions and values associated with piping 900 linear feet of stream. We have no objection to the construction of the remaining support structures for upgrading the airport (items 2-9 of Alt. 1), as long as they are in uplands and do not impact the riparian corridor.

Alternative 2 (a.k.a. Option 5 in Sect. 3.2) refers to changing the location of the project elements, and we believe this is a viable option. The runway can be aligned in a generally north/south configuration, similar to Option 6 (Alt. 1), with the proposed southern terminus equal to the location of the current southern terminus. The southern end should not be extended to fill in the stream valley. The northern end can be extended approximately 800-1,000 feet further north, beyond the length of the current runway. The runway protection zone (RPZ) on the northern end may extend into wetland 10, a portion of the field, Pomfret Road, and several houses. Disturbance to the local community may be comparable to that of your proposed Alt. 1. The southern RPZ would extend over the stream valley, which would require minimal cutting of the tree canopy to provide adequate safety clearance for approaching/departing aircraft. This would provide a runway approximately 3,800-4,000 feet long. While this length is slightly shorter than the proposed length, it would allow larger planes to utilize the facility, although not to the extent requested by the applicant. It would also reduce most of our environmental concerns, while allowing for all improvements to the runway and associated support structures and facilities, affording the owner an economic benefit.

We discussed the function of other regional airports acting as "relievers" to Reagan National Airport in our November 23, 1999 letter to you. To date, we have not received a response to this issue. We recommend that you evaluate other regional airports in your vicinity, such as St. Mary's County Airport, to consider their runway lengths and airplane capabilities. St. Mary's has a runway approximately 3,600 feet long, which may be sufficient to handle most corporate planes. Likewise, Washington Executive/Hyde Field may provide access for corporate planes. Washington/Hyde, as well as Potomac Airfield, are closer to Reagan National Airport than Maryland Airport. If they can handle corporate airplanes, then is there an actual "need" for the Maryland Airport to lengthen its runway? Is the issue of the proximity of other regional airports to Reagan National Airport addressed in your "purpose and need"?



Per our previous request dated November 5, 1999, we would like to review the airport Master Plan, as well as a complete copy of the draft EA. We recommend that you standardize the use of the terms "alternatives" and "options", as they are used to define more than one concept in Chapter 3

As proposed, we do not believe this project complies with NEPA and Clean Water Act guidelines for avoidance and minimization of impacts to the aquatic and human environment. In balancing the anticipated economic benefits with the substantial environmental impacts that would occur from this project, we feel it is unlikely that we could approve the project as proposed. We have offered some recommendations that would make the project permittable. If you have any questions, or would like to meet to discuss these issues, please contact me at (410) 962-5676.

Sincerely,

A handwritten signature in cursive script that reads "Paul R. Wettlaufer".

Paul R. Wettlaufer  
Transportation Program Manager

cc: Kate Meade, MDE  
Terry Page, FAA  
Maria Stephens, FAA  
Bruce Mundie, MAA  
Judy Brosema-Cole, MDE Nontidal Wetlands  
Gilbert Bauserman, Maryland Airport



# United States Department of the Interior

NATIONAL PARK SERVICE  
Chesapeake Bay Program Office  
410 Severn Avenue, Suite 109  
Annapolis, MD 21403

IN REPLY REFER TO:

June 29, 2001

**RECEIVED**

JUL 02 2001

Ms. Maria Stephens  
Federal Aviation Administration  
Washington Airports District Office  
P. O. Box 16780  
Washington, DC 20041

Dear Ms. Stephens:

In accordance with the Council on Environmental Quality's "Procedures for Interagency Consultation to Avoid or Mitigate Adverse Effects on Rivers in the Nationwide Inventory," the National Park Service Rivers, Trails and Conservation Assistance Program submits the following comments on the subject environmental assessment for the Maryland Airport located near Indian Head, Charles County, Maryland. These proposed airport improvements include replacing the existing 3,000-foot runway with a realigned 4,300-foot runway, installing navigational aids and an aboveground fuel tank, and construction of three additional hangars and a new terminal.

As a partner in the Chesapeake Bay Program, the National Park Service supports resource protection and restoration efforts in the watershed by advocating environmentally sensitive activities in the management of park units and through numerous programs that it administers. *Chesapeake 2000: A Watershed Partnership*, the renewed Chesapeake Bay Agreement, promotes the reduction of sediments, a measurable decrease in the rate of conversion of farms and forests to developed lands and more effective stewardship of the Bay's rivers and subwatersheds. This agreement, of which Maryland is a signatory, recognizes that the creeks, streams, wetlands and forest buffers that define the watershed's landscape are essential to the health and character of the Bay. In addition, forests are the most beneficial land use for maintaining water clarity. Acting as a living filter, forests capture rainfall, reduce stormwater runoff, maintain stream flow, trap sediment and pollution, and stabilize soil. *Chesapeake 2000* established goals to conserve existing forests along all streams and shorelines, to restore 2,010 miles of riparian forest by the year 2010, and to promote the expansion and connection of contiguous forests.

Our principal concern involves the construction of a new runway and parallel taxiway over an unnamed headwater tributary to Mattawoman Creek. As proposed, construction of the new runway will require clearing large areas of upland forest for approach clearance, extensive

clearing and filling of riparian buffer zones, and construction of a culvert over the tributary. A lower portion of Mattawoman Creek (confluence with the Potomac River to Route 225) has been officially listed in the Nationwide Rivers Inventory, at the request of Maryland Department of Natural Resources, due to its national prominence as a smallmouth bass fishery and the high diversity of fish species. In addition, the Mattawoman Creek watershed has been designated Category 1 Priority and Selected Category 3 in the *MARYLAND CLEAN WATER ACTION PLAN: Final 1998 Report on Unified Watershed Assessment, Watershed Prioritization and Plans for Restoration Action Strategies* because it exhibits signs of stress or degradation, while containing pristine or sensitive natural resources. Due to the relatively undisturbed condition of the watershed, it is particularly important to protect the headwaters of Mattawoman Creek to maintain its existing high water quality.

It is our opinion that the proposed airport improvements would cause significant long-term adverse effects to Mattawoman Creek. We believe that the clearing of forest lands, the loss of important wetland and floodplain functions (particularly critical in the headwaters), and the permitting of construction activities on steep slopes in riparian areas would induce siltation and thermal pollution in the unnamed tributaries, as well as to Mattawoman Creek. Such adverse effects would degrade the existing high-water quality, jeopardize the retention of Mattawoman Creek in the Nationwide Rivers Inventory and eliminate any future consideration of designation as a Wild and Scenic River.

We further believe that the Federal Aviation Administration and the airport sponsor, a private owner, have erred in the complying with the National Environmental Policy Act. National Park Service, as administrator of the Nationwide Rivers Inventory Program, should have been consulted early in the NEPA scoping process and prior to completion of the Environmental Assessment. Based on the Federal Aviation Administration's guidance presented in FAA Order 5050.4A, the airport sponsor is responsible for the preparation of the Environmental Assessment and for coordinating with "appropriate local, state, and Federal agencies..." and the Federal Aviation Administration is required "...to assure that all documentation presents a full, accurate, and fair assessment of the environmental consequences of the proposed action." As NEPA is a Federal process, we believe the Federal Aviation Administration is responsible for ensuring that it complies with the spirit and intent of NEPA and that it ensures that appropriate Federal consultation occurs. FAA Order 5050.4A also clearly states that—

Paragraph (15) (b): As soon as it appears that the proposed action could affect an Inventory river, contact DOI for verification. If DOI indicates that an Inventory river could be affected, refer to the "Procedures for Interagency Consultation to Avoid or Mitigate Adverse Effects on Rivers in the Nationwide Inventory"...for guidance." The environmental assessment shall document consultation with DOI in making a determination and describe any measures taken to avoid or minimize any adverse effect.

The alternatives section of the Environmental Assessment refers to alternatives in the master plan that were initially considered but eliminated from further consideration due to the airport sponsor's inability to acquire land. We feel that such a restriction on an airport serving as a

reliever to Ronald Reagan National Airport is unfortunate. However, Federal funding is supporting this facility, it is listed in both the National Plan of Integrated Airport Systems and the Maryland State System Plan and it obviously serves an important function in the region. Based on its national and regional context, we believe that the Federal Aviation Administration has an obligation to assist the airport sponsor in assessing a reasonable range of alternatives that would not only accommodate airport activities, but would also minimize adverse effects to the environment. We do not believe that the assessment adequately addresses a reasonable range of alternatives or adequately evaluates the impacts to the alternatives discussed.

The National and State System Plans indicate that the existing Airport Reference Code (ARC) for Maryland Airport is A-1, which represents a facility serving small, single-engine and light twin-engine aircraft. The assessment states that the airport currently serves aircraft that require a facility with an ARC of A-I or B-II. However, Table I.1, Sample Aircraft Served by the Airport, identifies turbo props and corporate aircraft (i.e., business jets) that require a facility with an ARC of C-I, D-I or D-II to ensure safe operation. The airport sponsor's preferred alternative (Alternative 1) identifies improvements that will result in the development of an airport with an ARC of B-II to serve the Cessna Citation III. However, based on the information presented in Table I.1, the Lear 35/36 appears to be the critical aircraft that requires an ARC of D-I.

The Environmental Assessment lacks information regarding the extension of the primary runway by 1,300 feet. From the information provided in the Environmental Assessment, it appears that the proposed 4,300-foot runway may be sufficient to safely serve the Citation III, but our concern is that other corporate aircraft, such as Learjets that are shown to use Maryland Airport, may not be adequately served and that the Environmental Assessment may not be disclosing the ultimate design of Maryland Airport. If the airport sponsor desires to accommodate corporate aircraft in the future, it is our understanding from Federal Aviation Administration guidance that a longer runway, such as 5,500 to 6,000 feet with a precision instrument approach, would most likely be required.

Further, Federal Aviation Administration guidance states that the recommended length of the primary runway is determined by the design aircraft using the runway at least 250 times a year (FAA AC 150/5325-4A). We cannot determine from the limited forecast analysis in the Environmental Assessment if the Citation III or the Learjets use Maryland Airport at this annual level. The Environmental Assessment aggregates annual operations but does not identify the number of annual operations by aircraft type. To better understand the existing and future use of the airport, the Environmental Assessment should disclose the following information:

- Annual operations by aircraft type
- Aircraft mix and number of aircraft; based and itinerant
- If the critical design aircraft is the Cessna Citation III, the number of existing and forecasted annual operations should be identified
- Number of based and itinerant aircraft
- Percentage of existing and forecasted arrivals and departures by runway

It appears that the proposed navigational aids will continue to support a visual approach. However, it is our understanding that corporate aircraft, such as the Learjets and Citation III require a longer runway length and a precision instrument approach runway. It appears likely that the airport sponsor would petition Federal Aviation Administration in the future as operations increase to accommodate corporate aircraft requiring a longer runway and a precision instrument approach runway. We are concerned that the proposed improvements to this airport would be segmented or phased over time, and if so, the Environmental Assessment should disclose the cumulative effects of the ultimate design.

The National Park Service appreciates the opportunity to comment on this project. If I can be of further assistance, please contact me at 410.267.5787 or [hastings.wink@epa.gov](mailto:hastings.wink@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Wink Hastings', written over a horizontal line.

Wink Hastings  
Landscape Architect

cc: John Robinson, Talbert and Bright, Inc.  
Bruce Mundie, Maryland Aviation Administration  
Richard Bulavinetz, U. S. Army Corps of Engineers