

**ATTACHMENT 4**

**VA DHR Coordination**

**From:** [Stafford, Susan \(FAA\)](#)  
**To:** [Stevens, Laura](#)  
**Subject:** FW: Roanoke-Blacksburg Regional Airport (ROA) Proposed Nordt Property Acquisition (DHR File No. 2020-4865 ) | e-Mail #03347  
**Date:** Friday, January 15, 2021 10:51:04 AM

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FYI

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

**From:** Adrienne Birge-wilson <Adrienne.Birge-Wilson@dhr.virginia.gov>  
**Sent:** Friday, January 15, 2021 10:30 AM  
**To:** Stafford, Susan (FAA) <Susan.Stafford@faa.gov>  
**Subject:** Roanoke-Blacksburg Regional Airport (ROA) Proposed Nordt Property Acquisition (DHR File No. 2020-4865 ) | e-Mail #03347

Susan,

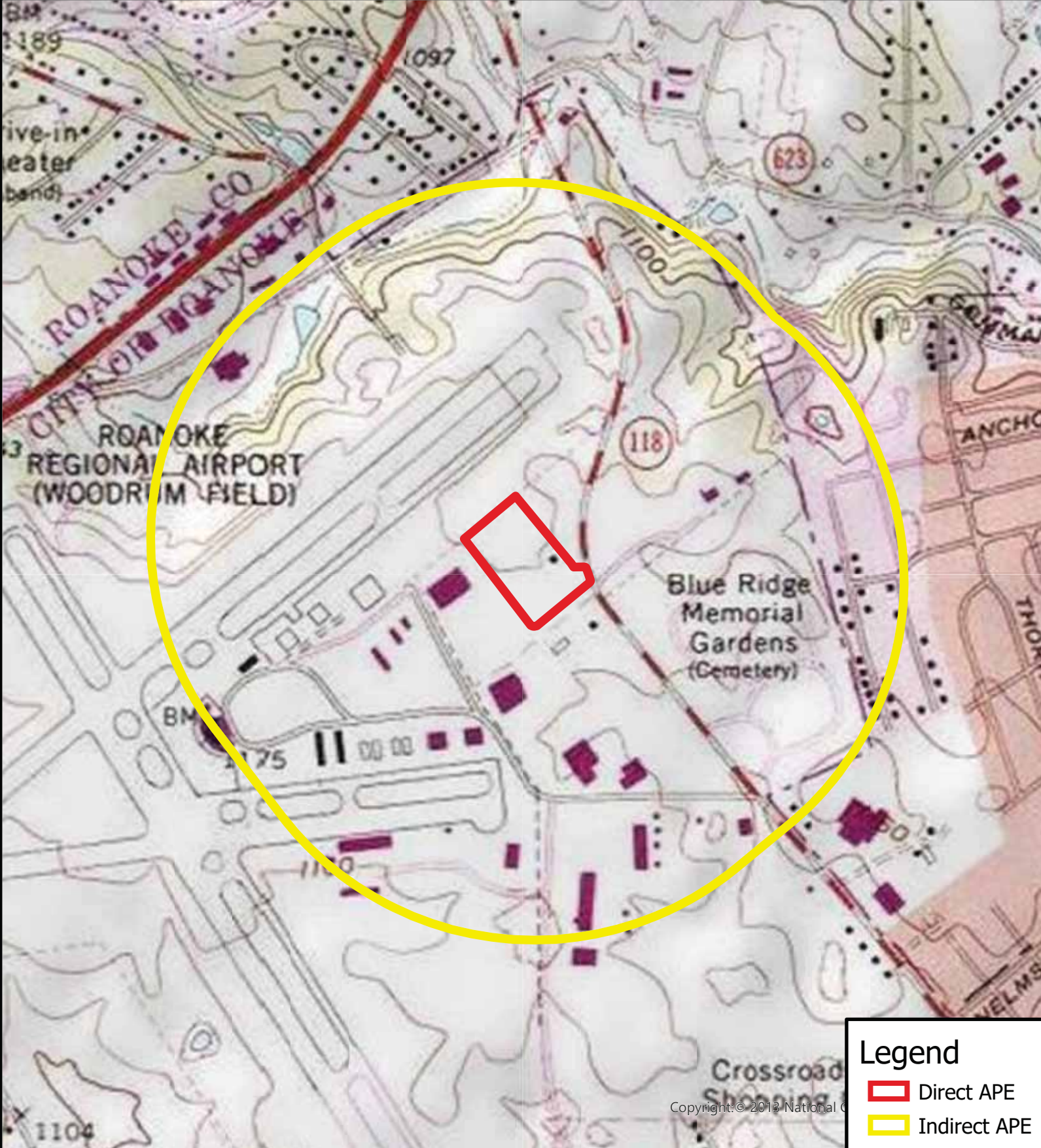
Thank you for requesting comments from the Department of Historic Resources on the referenced project. Based upon the documentation provided, it is our opinion that no historic properties will be affected by the proposed undertaking.

Implementation of the undertaking in accordance with the finding of No Historic Properties Affected as documented fulfills the Federal agency's responsibilities under Section 106 of the National Historic Preservation Act. If for any reason the undertaking is not or cannot be conducted as proposed in the finding, consultation under Section 106 must be reopened.

If you have any questions or if we may provide any further assistance at this time, please do not hesitate to contact me.

Sincerely,

Adrienne Birge-Wilson, Architectural Historian  
Office of Review and Compliance  
Division of Resource Services and Review  
Phone: (804) 482-6092  
[Adrienne.Birge-Wilson@dhr.virginia.gov](mailto:Adrienne.Birge-Wilson@dhr.virginia.gov)



**Legend**

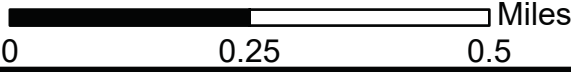
- Direct APE
- Indirect APE

Copyright: © 2013 National Geographic



## Area of Potential Effect (APE)

Proposed Nordt Property Acquisition  
 Roanoke–Blacksburg Regional Airport  
 Roanoke County, VA





### Legend

- Architecture Labels
- Architecture Points
- ☑ Historic Districts
- County Boundaries



Nordt Property Study Area



Feet

0 200 400 600 800  
1:9,028 / 1"=752 Feet

**Title: Nordt Property Acquisition**

**Date: 10/29/2020**

*DISCLAIMER: Records of the Virginia Department of Historic Resources (DHR) have been gathered over many years from a variety of sources and the representation depicted is a cumulative view of field observations over time and may not reflect current ground conditions. The map is for general information purposes and is not intended for engineering, legal or other site-specific uses. Map may contain errors and is provided "as-is". More information is available in the DHR Archives located at DHR's Richmond office.*

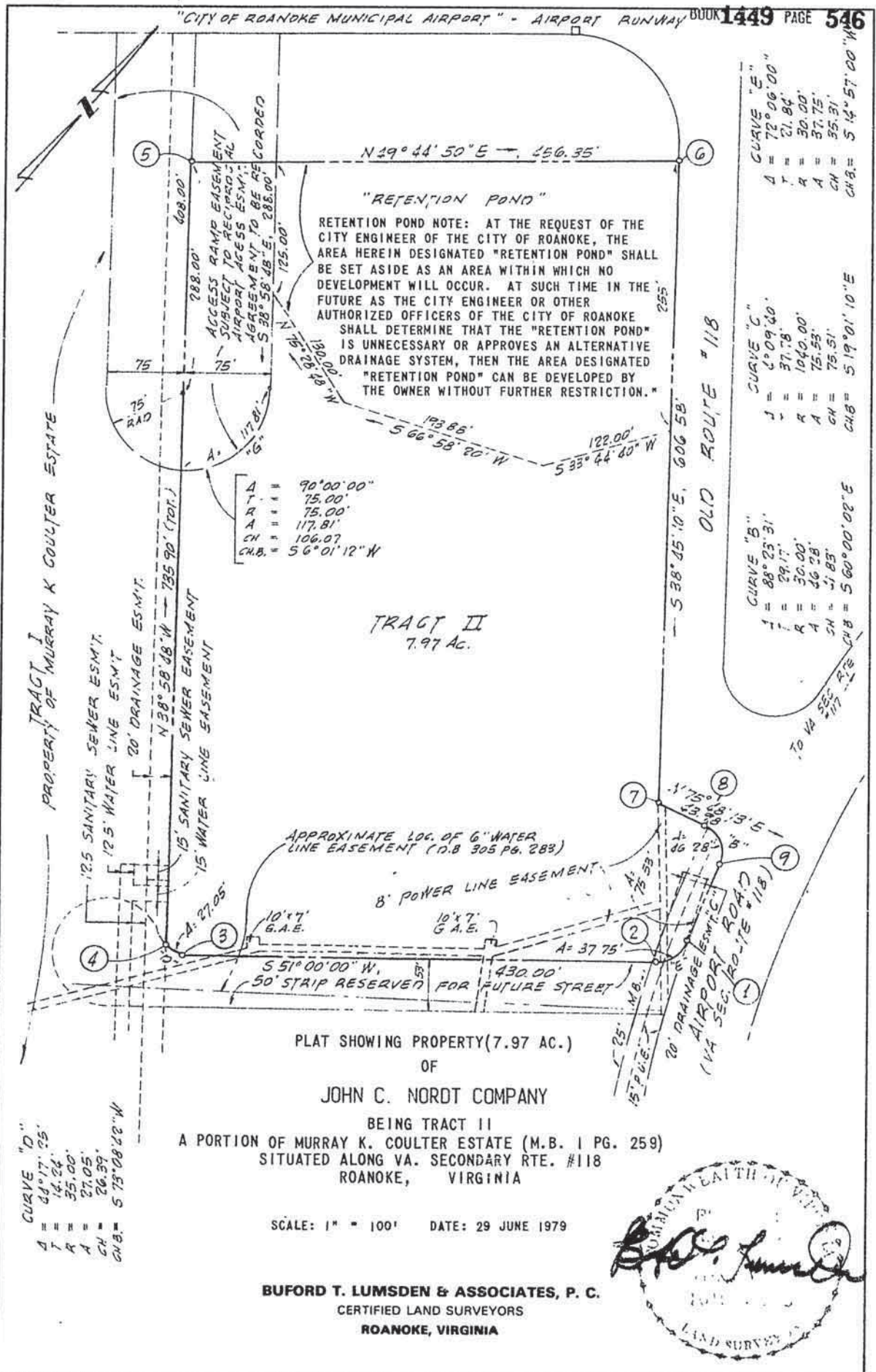
*Notice if AE sites: Locations of archaeological sites may be sensitive the National Historic Preservation Act (NHPA), and the Archaeological Resources Protection Act (ARPA) and Code of Virginia §2.2-3705.7 (10). Release of precise locations may threaten archaeological sites and historic resources.*

DHR ARCHIVES SEARCH

<b>DHR_ID</b>	<b>SiteNames</b>	<b>EvaluationStatus</b>	<b>Construction Year</b>	<b>Resource Type</b>
128-6037	Building #11, Roanoke Regional Airport (Current)	DHR Staff: Not Eligible	1938	Aviation-Related
128-6038	Building #12, Roanoke Regional Airport (Current)	DHR Staff: Not Eligible	1938	Aviation-Related
128-6034	Former Terminal, Roanoke Regional Airport (Current), Terminal, Woodrum Field (Historic)	DHR Staff: Not Eligible	1951	Aviation-Related
128-6035	Hangar #1, Roanoke Regional Airport (Historic), Hangar #2, Roanoke Regional Airport (Current)	DHR Staff: Not Eligible	1930	Hangar
128-6036	Hangar #2, Roanoke Regional Airport (Historic), Hangar #3, Roanoke Regional Airport (Current)	DHR Staff: Not Eligible	1938	Hangar
128-5440	Waverly (Historic)	null	1860	Single Dwelling

**ATTACHMENT 5**

**Restrictive Covenant  
Coordination**



SCALE: 1" = 100' DATE: 29 JUNE 1979

**BUFORD T. LUMSDEN & ASSOCIATES, P. C.**  
 CERTIFIED LAND SURVEYORS  
 ROANOKE, VIRGINIA





**From:** [Adrian.Gilbert@RoanokeVa.gov](mailto:Adrian.Gilbert@RoanokeVa.gov)  
**To:** [Stevens, Laura](#)  
**Cc:** [David Jeavons](#); [Jillian.Papa.Moore@Roanokeva.gov](mailto:Jillian.Papa.Moore@Roanokeva.gov)  
**Subject:** Follow-up regarding ROA: Stormwater question  
**Date:** Friday, January 29, 2021 10:35:07 AM

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Good Morning Ms. Stevens,

I am responding to your question below on behalf of Jillian Moore. The area indicated as "retention pond" could be considered unnecessary as long as the requirements of State Code section 9VAC25-870-66 Water Quantity are met by any proposed development (provided over 10,000 SF of land is disturbed.) The services of a civil engineer experienced in Virginia stormwater management regulations may be needed in order to determine what may or may not be needed in order to meet these regulations. If it is desired to place any proposed stormwater facilities elsewhere within the parcel, or not at all provided regulations are met, I don't see how that would be a problem. I'm not sure what the circumstances were that generated the need for this language on the plat originally, yet stormwater regulations have changed significantly many times since 1979. Please let me know if you have any more questions.

Adrian Gilbert, CPII  
Development Program Administrator  
Direct (540) 632-0856

We recommend email as the most reliable form of communication at this time.

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

Good Afternoon Ms. Moore,

I am following up on Mr. Pugh's earlier email and phone messages I have left for you regarding the attached plat, which identifies a portion of the property as set aside for a retention pond. Roanoke-Blacksburg Regional Airport is looking into the possible purchase of this parcel (location map also attached). I am seeking your input on any requirements associated with future development of this parcel, specifically the retention pond set aside area.

Your assistance is greatly appreciated!

Thank you,

Laura

Laura Stevens, AICP



Parrish and Partners, LLC

803.978.7611 (direct)

803.331.5792 (cell)

[LStevens@parrishandpartners.com](mailto:LStevens@parrishandpartners.com)

**ATTACHMENT 6**

**Sponsor's Assurance**

## GENERAL WRITTEN ASSURANCES

In accordance with 49 U.S.C. § 47107 (a) (10) of the *1982 Airport Act*, the Airport Sponsor provides assurances that appropriate actions will be taken, to the extent reasonable, to restrict the use of land next to or near Roanoke-Blacksburg Regional Airport to purposes compatible with normal airport operations.

  
Signature \_\_\_\_\_ Date 1/22/21

David Jeavons, CPA  
Name \_\_\_\_\_

Interim Executive Director  
Title \_\_\_\_\_

Roanoke Regional Airport Commission  
Affiliation \_\_\_\_\_

(540) 362-1999 x284  
Phone Number \_\_\_\_\_

**ATTACHMENT 7**

**NEPAssist Environmental  
Justice Screen**



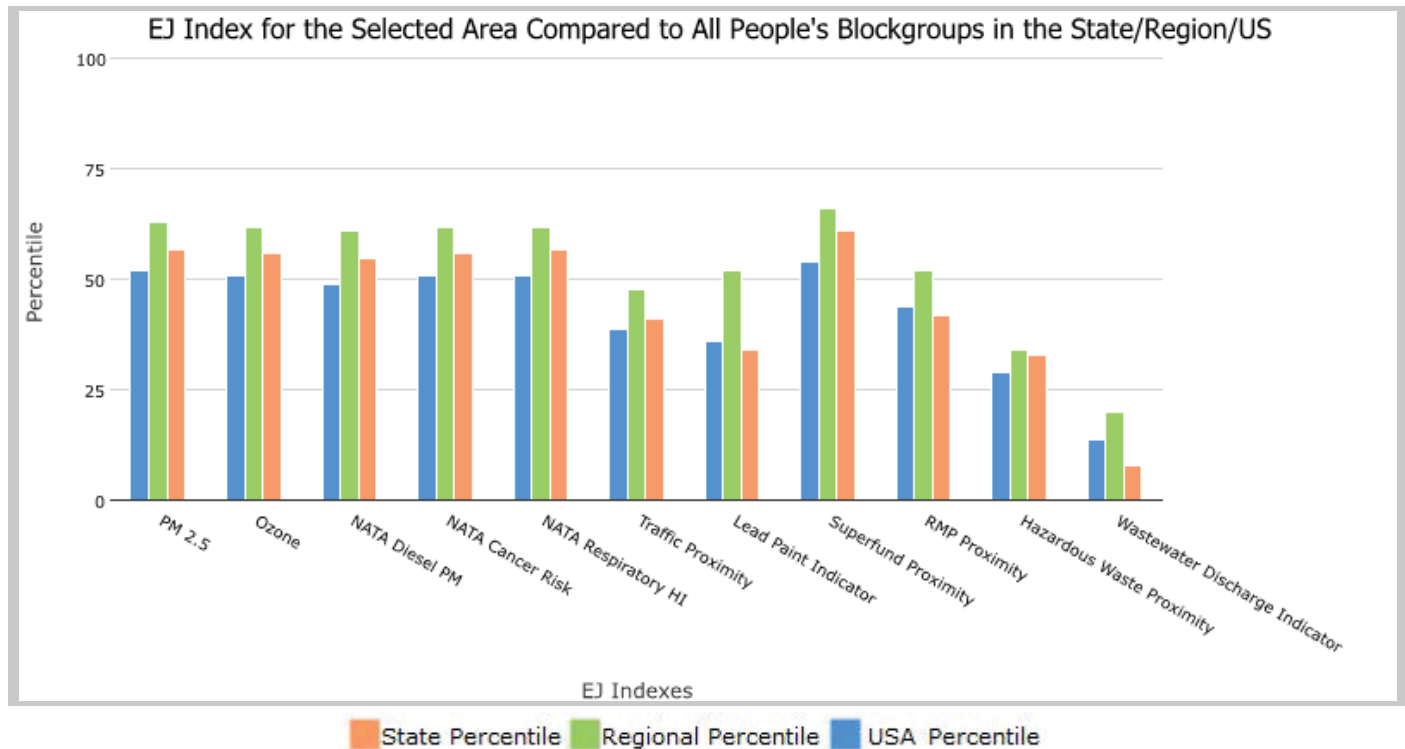
.5 miles Ring around the Area, VIRGINIA, EPA Region 3

Approximate Population: 570

Input Area (sq. miles): 1.04

ROA Nordt Property

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
<b>EJ Indexes</b>			
EJ Index for PM2.5	57	63	52
EJ Index for Ozone	56	62	51
EJ Index for NATA* Diesel PM	55	61	49
EJ Index for NATA* Air Toxics Cancer Risk	56	62	51
EJ Index for NATA* Respiratory Hazard Index	57	62	51
EJ Index for Traffic Proximity and Volume	41	48	39
EJ Index for Lead Paint Indicator	34	52	36
EJ Index for Superfund Proximity	61	66	54
EJ Index for RMP Proximity	42	52	44
EJ Index for Hazardous Waste Proximity	33	34	29
EJ Index for Wastewater Discharge Indicator	8	20	14



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

# EJSCREEN Report (Version 2020)

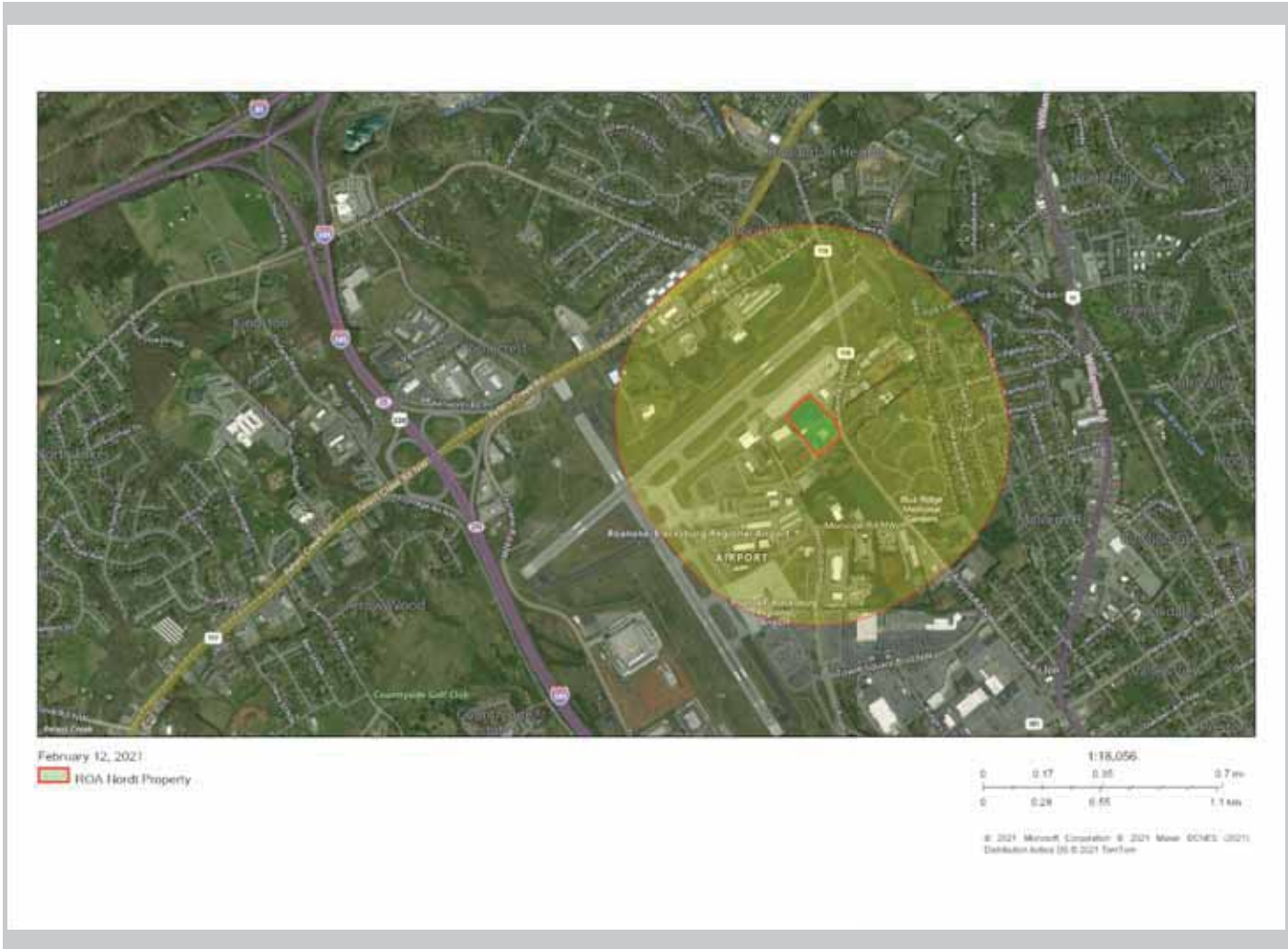


.5 miles Ring around the Area, VIRGINIA, EPA Region 3

Approximate Population: 570

Input Area (sq. miles): 1.04

ROA Nordt Property



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0



## EJSCREEN Report (Version 2020)

.5 miles Ring around the Area, VIRGINIA, EPA Region 3

Approximate Population: 570

Input Area (sq. miles): 1.04

ROA Nordt Property

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	7.26	7.87	12	8.63	5	8.55	16
Ozone (ppb)	42.6	42.4	56	43.2	36	42.9	48
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.286	0.425	34	0.477	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	29	31	38	31	<50th	32	<50th
NATA* Respiratory Hazard Index	0.37	0.41	27	0.4	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	300	570	60	650	55	750	57
Lead Paint Indicator (% Pre-1960 Housing)	0.33	0.21	77	0.36	56	0.28	65
Superfund Proximity (site count/km distance)	0.019	0.11	9	0.15	4	0.13	16
RMP Proximity (facility count/km distance)	0.34	0.38	71	0.62	57	0.74	52
Hazardous Waste Proximity (facility count/km distance)	2.2	1.6	74	2	72	5	67
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.013	3.1	94	34	80	9.4	81
<b>Demographic Indicators</b>							
Demographic Index	31%	32%	56	30%	62	36%	51
People of Color Population	27%	38%	40	33%	55	39%	46
Low Income Population	35%	25%	71	27%	69	33%	60
Linguistically Isolated Population	0%	3%	52	3%	55	4%	45
Population With Less Than High School Education	10%	11%	58	10%	60	13%	54
Population Under 5 years of age	5%	6%	43	6%	46	6%	42
Population over 64 years of age	24%	15%	86	16%	83	15%	86

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: [www.epa.gov/environmentaljustice](http://www.epa.gov/environmentaljustice)

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

**ATTACHMENT 8**

**Waters of the U.S.  
Investigation Report**



# Nordt Property

Roanoke City, Virginia

WSSI #31085.01

## Waters of the U.S. (Including Wetlands) Investigation

November 5, 2020

*Prepared for:*

Parrish and Partners, LLC  
140 Stoneridge Drive, Suite 500  
Columbia, SC 29210

*Prepared by:*



5450 Peters Creek Road, Suite 110  
Roanoke, Virginia 24019  
Tel: 540-795-6180 Email: [contactus@wetlands.com](mailto:contactus@wetlands.com)  
[www.wetlands.com](http://www.wetlands.com)

# Waters of the U.S. (Including Wetlands) Investigation

**Nordt Property  
(±8.0 acres)  
WSSI #31085.01**

## **Introduction**

Wetland Studies and Solutions, Inc. (WSSI) conducted a waters of the U.S. (including wetlands) investigation on the referenced site to investigate whether or not jurisdictional wetlands or other waters of the U.S. (*i.e.*, streams or ponds) are present. In WSSI's opinion, jurisdictional wetlands and other waters of the U.S. are not present within the project site. The results of WSSI's waters of the U.S. investigation are depicted on the Waters of the U.S. Investigation Sketch (Attachment I) and are summarized below.

## **Project Area**

The site is located adjacent to the Roanoke-Blacksburg Regional Airport between Municipal Road NW and Airport Road NW in Roanoke City, VA. Exhibit 1 is a vicinity map that depicts the approximate boundaries of the site and its general location.

## **Methodology**

This wetland investigation is based on an analysis of available reference documents and a pedestrian investigation. Prior to conducting field work, relevant background information was reviewed including the site topography; the Roanoke, VA 1984 USGS quadrangle (Exhibit 2) and 2019 National Wetlands Inventory (Exhibit 3) maps; City of Roanoke Soils Map data (Exhibit 4); and the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Panels 5116C0153G and 5116C0154G (Exhibit 5). The Spring 2002 Natural Color Imagery from Virginia Base Mapping Program (Exhibit 6), and February 2020 Natural Color Imagery from NearMap (Exhibit 7) which serves as a base for Exhibit 8 were examined to investigate whether signatures indicative of wetlands are found on the site.

On October 28, WSSI scientists Stephen Bendele, WPI.T.<sup>1</sup> conducted a pedestrian investigation on the site. The site was systematically searched for jurisdictional wetlands and other waters of the U.S. Potential waters of the U.S. on the site were identified based on a brief examination of the vegetation, soils and hydrology, and their approximate boundaries and locations. A formal wetland delineation, pursuant to the "Corps of Engineers Wetlands Delineation Manual," Technical Report Y-87-1 (1987 Manual) and subsequent guidance and modified by the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region*, Version 2.0 dated April 2012, was not conducted at this time.

Samples of vegetation, soils and hydrology were taken at a representative location to document the absence of waters of the U.S. A Routine Wetland Determination data forms describing the representative plant community, hydrology, and soil characteristics

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<sup>1</sup> Wetland Professional In Training, Society of Wetlands Scientists Certification Program, Inc.

is included as Exhibit 9. Photographs of the data point location, representative non-wetland communities, and other existing site conditions are included in Exhibit 10.

## **Findings**

In WSSI's opinion, no jurisdictional wetlands, or other waters of the U.S. (i.e., streams, ponds, etc.) are present on this site. The site consists primarily of maintained turf grass and two commercial buildings with associated impervious parking areas located in the central and southern portions of the site. The northern portion of the site is a forested stand dominated by American elm (*Ulmus americana*), Black Walnuts (*Juglans nigra*), Silver Maples (*Acer saccharinum*), and Sugar Maples (*Acer saccharum*).

## **Summary**

In WSSI's opinion, no jurisdictional wetlands or other waters of the U.S. are located on the Nordt property. Should purchase and development of the site proceed, we recommend submitting this report to the U.S. Army Corps of Engineers (COE) with a request for a jurisdictional determination (PJD) confirming the absence of waters of the U.S.

## **Limitations**

This study is based on examination of the vegetation, soils and hydrology and available reference documents. Field indicators can change with variations in hydrology and other factors. Therefore, our conclusions may vary significantly from future observation by others. This report assesses the potential for wetlands at the site at the time of our review and does not address conditions at a given time in the future.

Our review and report have been prepared in accordance with generally accepted guidelines for the conduct of an investigation for potential wetlands and other waters of the U.S. Conclusions presented herein are based upon our review of available information, the results of our field studies, and/or professional judgement. We make no other warranties, either expressed or implied, and our report is not a recommendation to buy, sell or develop the property.

We offer no opinion and do not purport to opine on the possible application of various building codes, zoning ordinances, other land use or platting regulations, environmental or health laws and other similar statutes, laws, ordinances, code and regulations affecting the possible use and occupancy of the Property for the purpose for which it is being used, except as specifically provided above.

The foregoing opinions are based on applicable laws, ordinances, and regulations in effect as of the date hereof and should not be construed to be an opinion as to the matters set out herein should such laws, ordinances or regulations be modified, repealed or amended.

Any reuse or modification of any of this document (whether hard copies or electronic transmittals) prepared by WSSI without written verification or adaptation by WSSI will be at the sole risk of the individual or entity utilizing said document and such use is without the authorization of WSSI. WSSI shall have no legal liability resulting from any and all claims, damages, losses, and expenses, including attorney's fees arising out of the unauthorized reuse or modification of this document. Client shall indemnify

WSSI from any claims arising out of unauthorized use or modification of the document whether hard copy or electronic.

This report does not constitute a jurisdictional determination of waters of the United States since only an investigation study was undertaken and such determinations must be verified by the U.S. Army Corps of Engineers or the Natural Resources Conservation Service (as applicable), and are subject to review by the U.S. Environmental Protection Agency.

WETLAND STUDIES AND SOLUTIONS, INC.



Stephen Bendele, WPIT<sup>2</sup>  
Environmental Technician



Benjamin N. Rosner, PWS, PWD, CE<sup>3</sup>  
Manager – Environmental Science

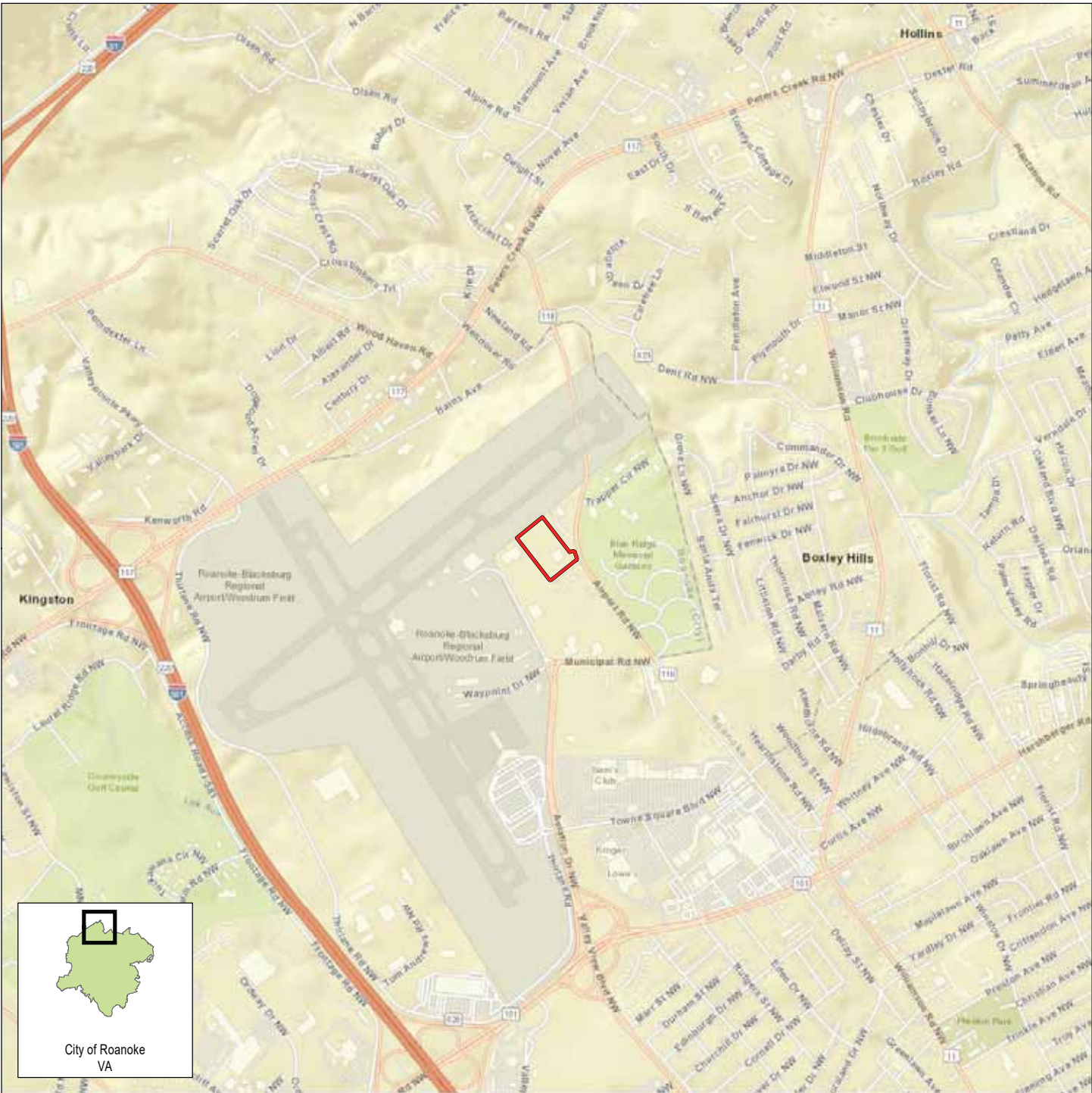
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<sup>2</sup> Wetland Professional in Training, Society of Wetland Scientists Certification Program, Inc.

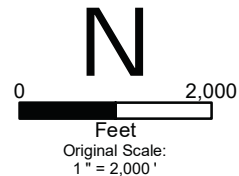
<sup>3</sup> Professional Wetland Scientist #1766, Society of Wetland Scientists Certification Program, Inc.;  
Virginia Certified Professional Wetland Delineator #3402-000080; Certified Ecologist,  
Ecological Society of America.





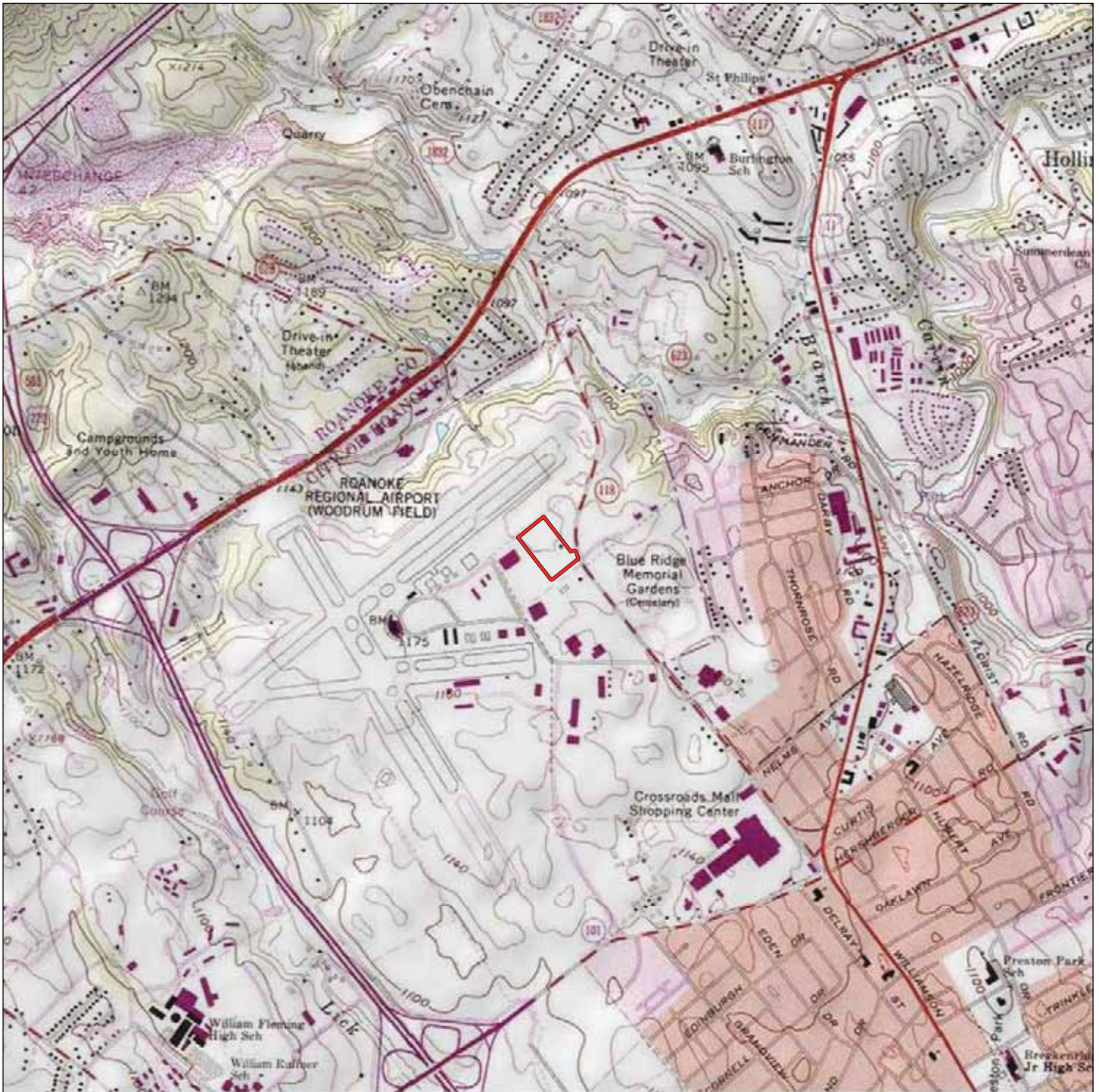
 Site

**Vicinity Map  
Nordt Property  
WSSI 31085.01**



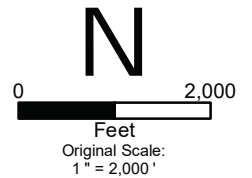
Source: World Street Map - ESRI



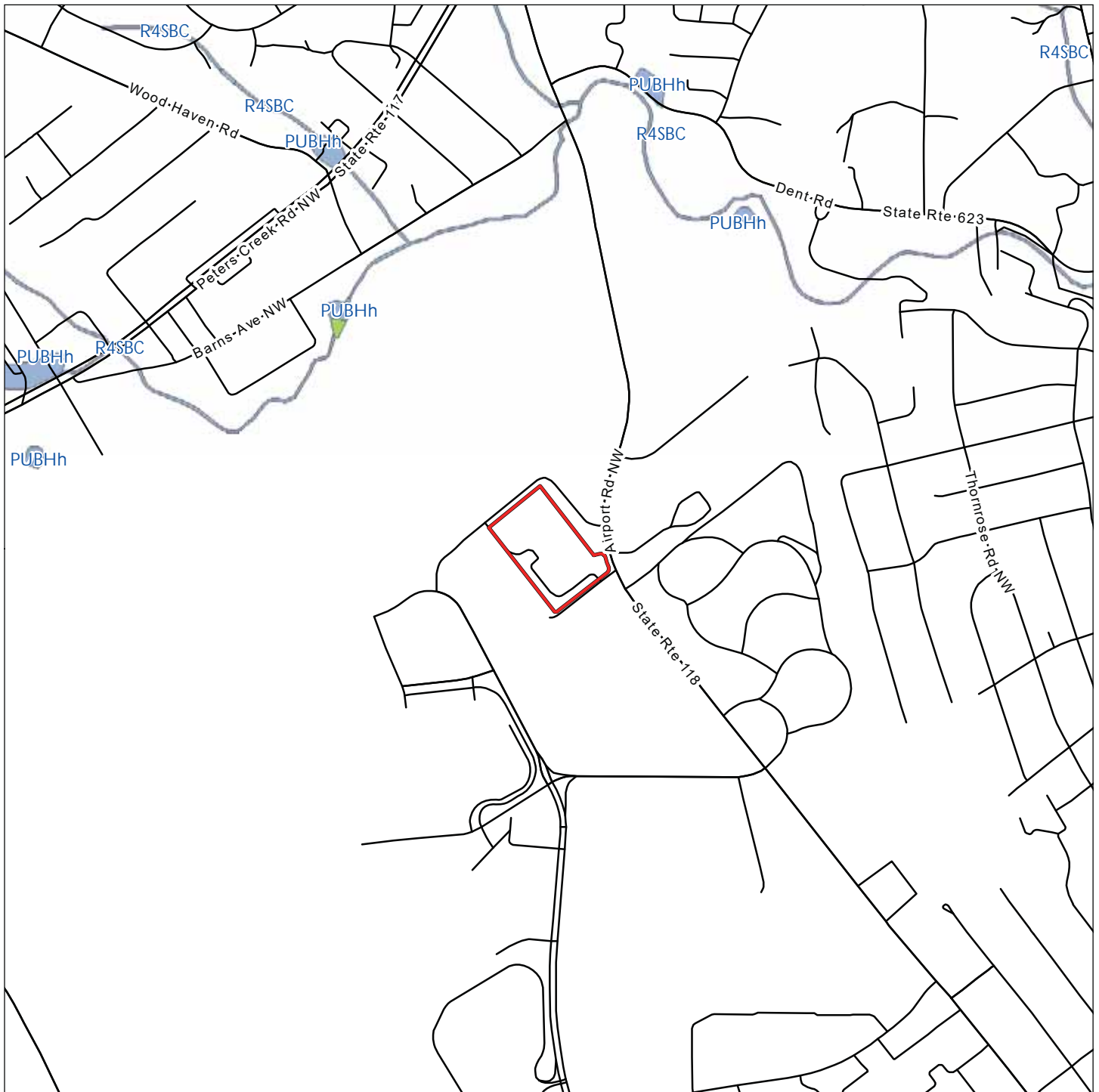


 Site

**USGS 7.5' Quadrangle Map  
 Nordt Property  
 WSSI 31085.01**



Roanoke, VA 1984  
 Latitude: 37°19'43"N  
 Longitude: 79°58'7"W  
 Hydrologic Unit Code (HUC): 030101010402  
 HUC12 Name: Carvin Creek  
 COE Region: Eastern Mountains and Piedmont



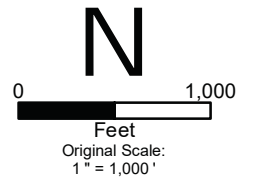
Site

**Wetland Type**

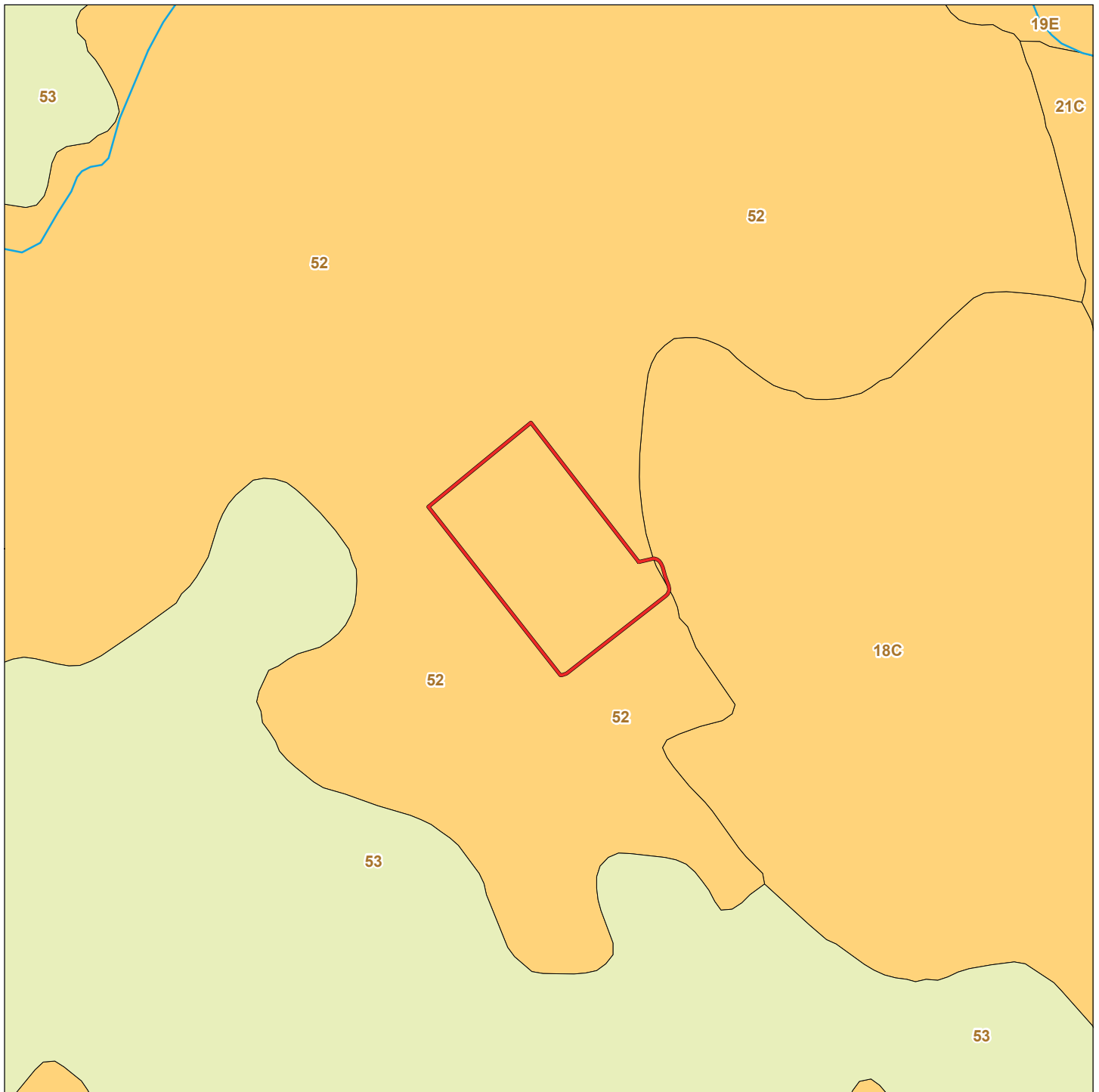
- Open Water
- Freshwater Forested/Shrub Wetland
- Freshwater Emergent Wetland
- Estuarine and Marine Wetland
- Other

**Digital National Wetlands Inventory Map**

**Nordt Property  
WSSI 31085.01**

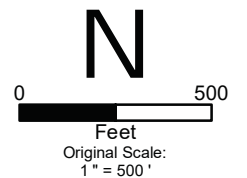


Source: U.S. Fish and Wildlife Service; March 2019



- Site
- Hydric Soil
- Soil with Hydric Inclusion
- Non-Hydric Soil
- Water

**Soils Map  
Nordt Property  
WSSI 31085.01**



Major Land Resource Area: Southern Appalachian Ridges and Valleys, 128  
 Land Resource Region: East and Central Farming and Forest Region, N  
 Source: City of Roanoke Digital Data, U.S. Department of Agriculture, 2019



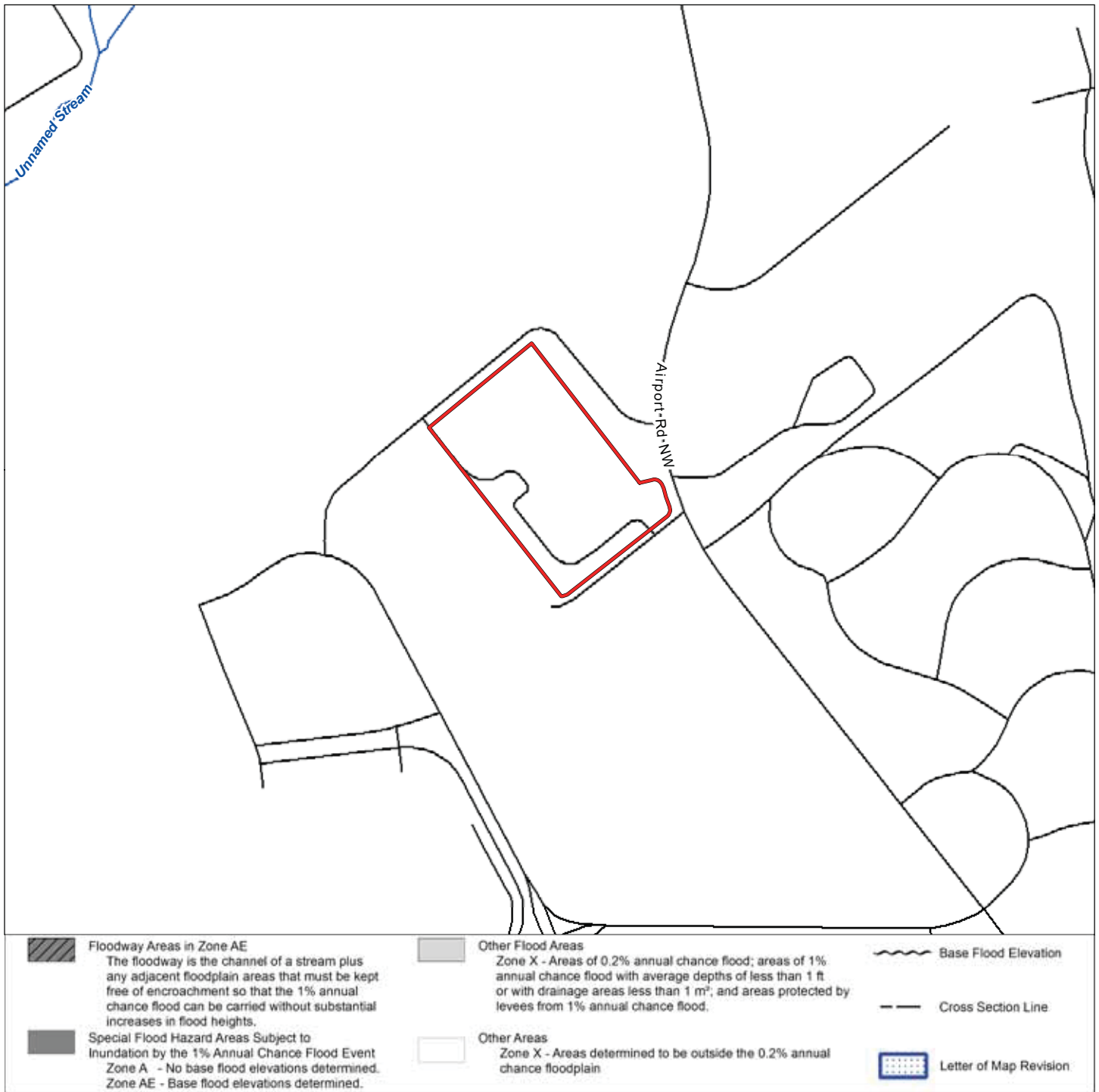
**Mapped Soils Report for Nordt Property**

**Project Number:** 31085.01

**Applicant / Owner:** Parrish and Partners, LLC

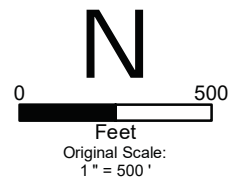
**County:** Roanoke, VA

<b>Map Symbol</b>	<b>Map Unit Name</b>	<b>Taxonomy</b>	<b>Drainage Class</b>	<b>Hydric National List</b>	<b>Hydric Local List</b>	<b>Hydric Inclusions</b>
52	Udorthents-Urban Land complex	Urban Land	well-drained	NO	NO	NA



 Site

**FEMA Digital Flood Insurance Rate Map  
Nordt Property  
WSSI 31085.01**

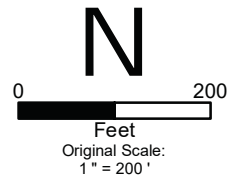


Panel: 51161C0153G, Effective: 09/28/2007  
Panel: 51161C0154G, Effective: 09/28/2007



 Site

**Spring 2002 Natural Color Imagery  
Nordt Property  
WSSI 31085.01**



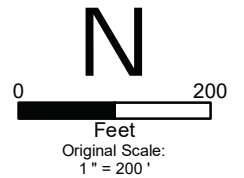
Source: Virginia Base Mapping Program (VBMP)





 Site




**February 2020 Natural Color Imagery  
Nordt Property  
WSSI 31085.01**



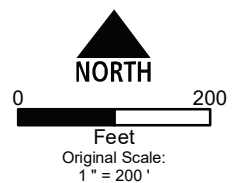
Source: NearMap®





-  Site: ±8.0 acres
-  Photo Location
-  Data Point

**Photo Location Map**  
**Nordt Property**  
**WSSI #31085.01**



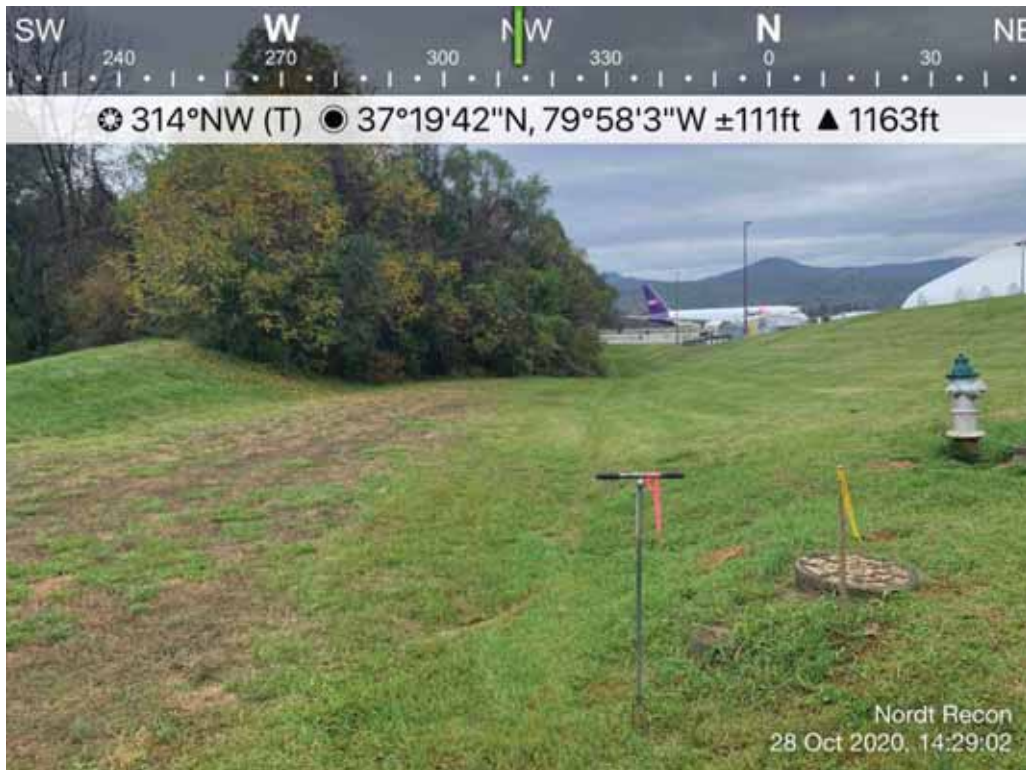
Imagery Source: Nearmap® February, 2020.



**EXHIBIT 9  
SITE PHOTOGRAPHS  
Nordt Property Reconnaissance  
WSSI #31085.01**



1. Looking northwest at an area of maintained lawn in the southwestern portion of the site.



2. Looking northwest at an area of maintained lawn in the central portion of the site.



**EXHIBIT 9**  
**SITE PHOTOGRAPHS**  
**Nordt Property Reconnaissance**  
**WSSI #31085.01**



3. Looking southwest at a forest area in the northwestern portion of the site.



4. Looking northeast at a forested area in the northwestern portion of the site.



EXHIBIT 9  
SITE PHOTOGRAPHS  
Nordt Property Reconnaissance  
WSSI #31085.01



5. Looking northeast at a forested area in the northeastern portion of the project area.



6. Looking east at a forested area in the northeastern portion of the site.



EXHIBIT 9  
SITE PHOTOGRAPHS  
Nordt Property Reconnaissance  
WSSI #31085.01



7. Looking northwest at an area of maintained lawn in the southeastern portion of the site.



8. Looking northeast at an area of maintained lawn in the southeastern portion of the site.



**EXHIBIT 9  
SITE PHOTOGRAPHS  
Nordt Property Reconnaissance  
WSSI #31085.01**



9. Looking southeast at an area of maintained lawn in the central portion of the site.



10. Looking northwest at data point 1 which characterizes a forested upland in the central portion of the site.

## WETLAND DETERMINATION DATA FORM - Eastern Mountains and Piedmont Region

Project/Site: Nordt Property City/County: Roanoke Sampling Date: 10/28/2020  
 Applicant/Owner: Parrish and Partners, LLC State: VA Sampling Point: DP-1  
 Investigator(s): Stephen Bendele Section, Township, Range: N/A  
 Landform (hillslope, terrace, etc.): forest Local relief (concave, convex, none): None Slope (%): 0  
 Subregion (LRR or MLRA): MLRA 128 Lat: 37°19'43" Long: 79°58'07" Datum: NAD 83  
 Soil Map Unit Name: 52 : Udorthents-Urban Land Complex NWI classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes  No  (If no, explain in Remarks)  
 Are Vegetation , Soil , or Hydrology  significantly disturbed? Are "Normal Circumstances" present? Yes  No   
 Are Vegetation , Soil , or Hydrology  naturally problematic? (If needed, explain any answers in Remarks.)

### SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<b>Is the Sampled Area within a Wetland?</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: None of the three wetland parameters (i.e., wetland hydrology, hydrophytic vegetation, and hydric soils) were satisfied at this data point, which characterizes an forested upland in the central portion of the site.	

### HYDROLOGY

<b>Wetland Hydrology Indicators:</b> Primary Indicators (minimum of one is required; check all that apply) <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><input type="checkbox"/> Surface Water (A1)</td> <td style="width: 50%; border: none;"><input type="checkbox"/> True Aquatic Plants (B14)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> High Water Table (A2)</td> <td style="border: none;"><input type="checkbox"/> Hydrogen Sulfide Odor (C1)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Saturation (A3)</td> <td style="border: none;"><input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Water Marks (B1)</td> <td style="border: none;"><input type="checkbox"/> Presence of Reduced Iron (C4)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Sediment Deposits (B2)</td> <td style="border: none;"><input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Drift Deposits (B3)</td> <td style="border: none;"><input type="checkbox"/> Thin Muck Surface (C7)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Algal Mat or Crust (B4)</td> <td style="border: none;"><input type="checkbox"/> Other (Explain in Remarks)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Iron Deposits (B5)</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Water-Stained Leaves (B9)</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Aquatic Fauna (B13)</td> <td></td> </tr> </table>	<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> True Aquatic Plants (B14)	<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)	<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Thin Muck Surface (C7)	<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> Iron Deposits (B5)		<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)		<input type="checkbox"/> Water-Stained Leaves (B9)		<input type="checkbox"/> Aquatic Fauna (B13)		Secondary Indicators (minimum of two required) <table style="width: 100%; border: none;"> <tr><td style="border: none;"><input type="checkbox"/> Surface Soil Cracks (B6)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Drainage Patterns (B10)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Moss Trim Lines (B16)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Dry-Season Water Table (C2)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Crayfish Burrows (C8)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Stunted or Stressed Plants (D1)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Geomorphic Position (D2)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Shallow Aquitard (D3)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Microtopographic Relief (D4)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> FAC-Neutral Test (D5)</td></tr> </table>	<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	<input type="checkbox"/> Drainage Patterns (B10)	<input type="checkbox"/> Moss Trim Lines (B16)	<input type="checkbox"/> Dry-Season Water Table (C2)	<input type="checkbox"/> Crayfish Burrows (C8)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)	<input type="checkbox"/> Stunted or Stressed Plants (D1)	<input type="checkbox"/> Geomorphic Position (D2)	<input type="checkbox"/> Shallow Aquitard (D3)	<input type="checkbox"/> Microtopographic Relief (D4)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> True Aquatic Plants (B14)																																		
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<input type="checkbox"/> Microtopographic Relief (D4)																																			
<input type="checkbox"/> FAC-Neutral Test (D5)																																			

<b>Field Observations:</b> Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): > 18 Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): > 18 (includes capillary fringe)	<b>Wetland Hydrology Present?</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
--	---

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

**VEGETATION (Four Strata) - Use scientific names of plants.**

Sampling Point: DP-1

Tree Stratum (Plot size: <u>30' Radius</u> )	Absolute % Cover	Dominant Species?	Indicator Status
1. <u><i>Pyrus calleryana</i></u>	<u>50</u>	<input checked="" type="checkbox"/>	<u>UPL</u>
2. <u><i>Acer saccharinum</i></u>	<u>40</u>	<input checked="" type="checkbox"/>	<u>FACW</u>
3. <u><i>Acer saccharum</i></u>	<u>30</u>	<input checked="" type="checkbox"/>	<u>FACU</u>
4. <u><i>Juglans nigra</i></u>	<u>5</u>	<input type="checkbox"/>	<u>FACU</u>
5. _____	_____	<input type="checkbox"/>	_____
6. _____	_____	<input type="checkbox"/>	_____
7. _____	_____	<input type="checkbox"/>	_____
8. _____	_____	<input type="checkbox"/>	_____
50% of total cover: <u>62.5</u> 20% of total cover: <u>25</u>	<u>125</u> = Total Cover		
Sapling/Shrub Stratum (Plot size: <u>15' Radius</u> )			
1. _____	_____	<input type="checkbox"/>	_____
2. _____	_____	<input type="checkbox"/>	_____
3. _____	_____	<input type="checkbox"/>	_____
4. _____	_____	<input type="checkbox"/>	_____
5. _____	_____	<input type="checkbox"/>	_____
6. _____	_____	<input type="checkbox"/>	_____
7. _____	_____	<input type="checkbox"/>	_____
8. _____	_____	<input type="checkbox"/>	_____
9. _____	_____	<input type="checkbox"/>	_____
10. _____	_____	<input type="checkbox"/>	_____
50% of total cover: _____ 20% of total cover: _____	_____ = Total Cover		
Herb Stratum (Plot size: <u>5' Radius</u> )			
1. <u><i>Lonicera japonica</i></u>	<u>8</u>	<input checked="" type="checkbox"/>	<u>FACU</u>
2. <u><i>Lonicera maackii</i></u>	<u>4</u>	<input checked="" type="checkbox"/>	<u>UPL</u>
3. <u><i>Ulmus americana</i></u>	<u>1</u>	<input type="checkbox"/>	<u>FACW</u>
4. _____	_____	<input type="checkbox"/>	_____
5. _____	_____	<input type="checkbox"/>	_____
6. _____	_____	<input type="checkbox"/>	_____
7. _____	_____	<input type="checkbox"/>	_____
8. _____	_____	<input type="checkbox"/>	_____
9. _____	_____	<input type="checkbox"/>	_____
10. _____	_____	<input type="checkbox"/>	_____
11. _____	_____	<input type="checkbox"/>	_____
12. _____	_____	<input type="checkbox"/>	_____
50% of total cover: <u>6.5</u> 20% of total cover: <u>2.6</u>	<u>13</u> = Total Cover		
Woody Vine Stratum (Plot size: <u>30' Radius</u> )			
1. <u><i>Vitis sp.</i></u>	<u>10</u>	<input checked="" type="checkbox"/>	<u>NI</u>
2. _____	_____	<input type="checkbox"/>	_____
3. _____	_____	<input type="checkbox"/>	_____
4. _____	_____	<input type="checkbox"/>	_____
5. _____	_____	<input type="checkbox"/>	_____
6. _____	_____	<input type="checkbox"/>	_____
50% of total cover: <u>5</u> 20% of total cover: <u>2</u>	<u>10</u> = Total Cover		

**Dominance Test worksheet:**

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 5 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 20.0% (A/B)

**Prevalence Index worksheet:**

Total % Cover of:	Multiply by:
OBL species <u>0</u>	x 1 = <u>0</u>
FACW species <u>41</u>	x 2 = <u>82</u>
FAC species <u>0</u>	x 3 = <u>0</u>
FACU species <u>43</u>	x 4 = <u>172</u>
UPL species <u>54</u>	x 5 = <u>270</u>
Column Totals: <u>138</u> (A)	<u>524</u> (B)
Prevalence Index = B/A = <u>3.80</u>	

- Hydrophytic Vegetation Indicators:**
- 1 - Rapid Test for Hydrophytic Vegetation
  - 2 - Dominance Test is >50%
  - 3 - Prevalence Index is ≤3.0<sup>1</sup>
  - 4 - Morphological Adaptations<sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)
  - Problematic Hydrophytic Vegetation<sup>1</sup> (Explain)
- <sup>1</sup>Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

**Definitions of Four Vegetation Strata:**

Tree - Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub - Woody plants, excluding vines, less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb - All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vine - All woody vines greater than 3.28 ft in height.

**Hydrophytic Vegetation Present?** Yes  No

Remarks: (Include photo numbers here or on a separate sheet.)

Nomenclature and indicators from The National Wetland Plant List: 2018 wetland ratings with updates through September 2020; NI species are not used in the Dominance Test Calculation.



**SOIL**

Sampling Point: DP-1

**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

Depth (Inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>		
0-3	10YR5/4	100					Loam	
3-13	10YR5/4	80	7.5YR4/3	15	C	M	Clay Loam	
			7.5YR4/6	5	C	M		
13-18	7.5YR5/6	90	7.5YR5/3	10	D	M	Clay	

<sup>1</sup>Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. <sup>2</sup>Location: PL=Pore Lining, M=Matrix

**Hydric Soil Indicators:**

- Histosol (A1)
- Histic Epipedon (A2)
- Black Histic (A3)
- Hydrogen Sulfide (A4)
- Stratified Layers (A5)
- 2 cm Muck (A10) (**LRR N**)
- Depleted Below Dark Surface (A11)
- Thick Dark Surface (A12)
- Sandy Mucky Mineral (S1) (**LRR N, MLRA 147, 148**)
- Sandy Gleyed Matrix (S4)
- Sandy Redox (S5)
- Stripped Matrix (S6)

- Dark Surface (S7)
- Polyvalue Below Surface (S8) (**MLRA 147, 148**)
- Thin Dark Surface (S9) (**MLRA 147, 148**)
- Loamy Gleyed Matrix (F2)
- Depleted Matrix (F3)
- Redox Dark Surface (F6)
- Depleted Dark Surface (F7)
- Redox Depressions (F8)
- Iron Manganese Masses (F12) (**LRR N, MLRA 136**)
- Umbric Surface (F13)
- Piedmont Floodplain Soils (F19)(**MLRA 148**)
- Red Parent Material (F21)(**MLRA 127, 147**)

**Indicators for Problematic Hydric Soils<sup>3</sup>:**

- 2 cm Muck (A10)
- Coast Prairie Redox (A16) (**MLRA 147, 148**)
- Piedmont Floodplain Soils (F19) (**MLRA 136, 147**)
- Very Shallow Dark Surface (TF12)
- Other (Explain in Remarks)

<sup>3</sup>Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

**Restrictive Layer (if observed):**

Type: \_\_\_\_\_  
 Depth (Inches): \_\_\_\_\_

Hydric Soil Present? Yes  No

Remarks:

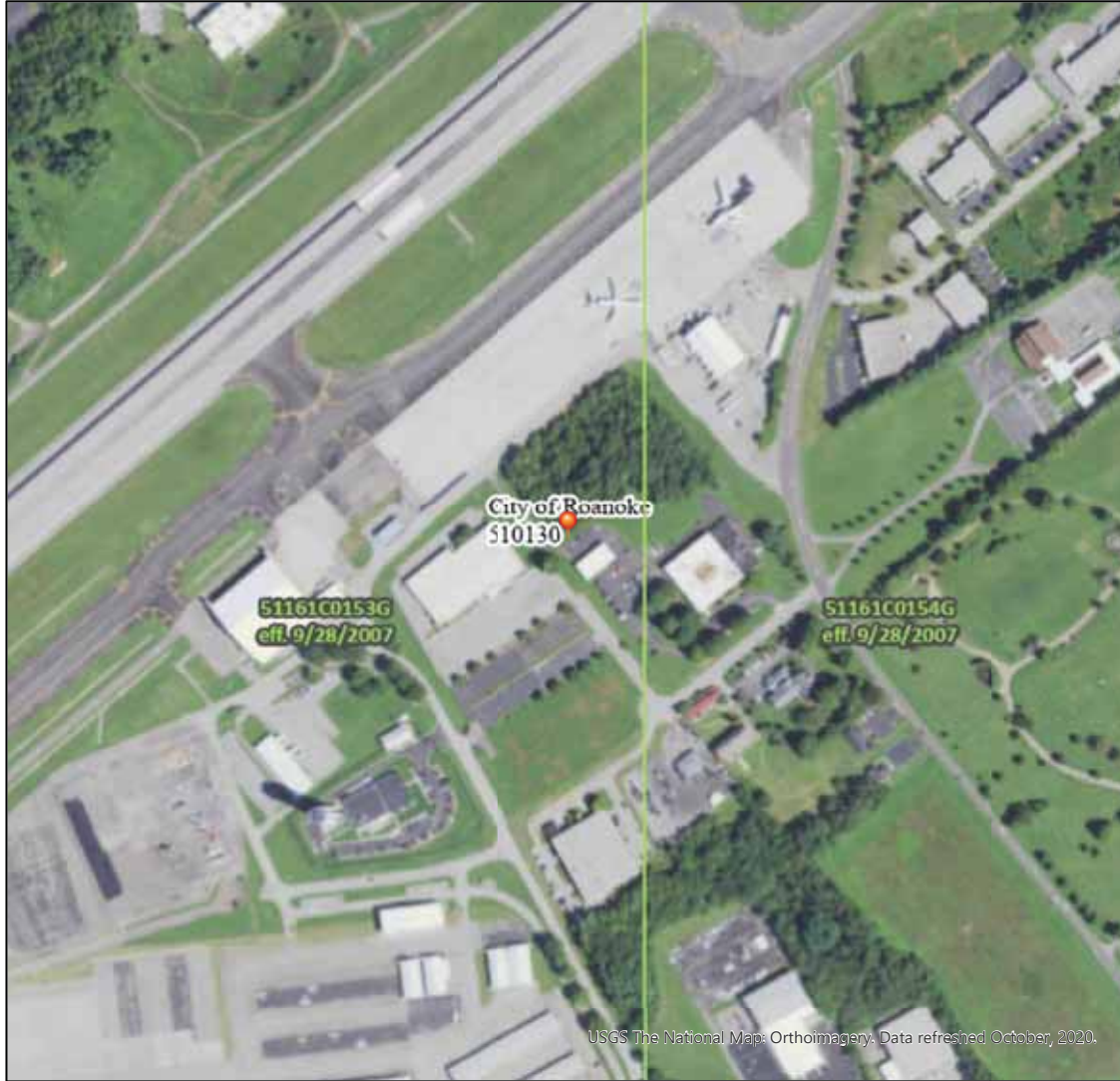
**ATTACHMENT 9**

**FEMA Floodplain Map**

# National Flood Hazard Layer FIRMette



79°58'29"W 37°19'57"N



## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, AB99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
OTHER FEATURES		Coastal Transect Baseline
		Profile Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped
		The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **11/3/2020 at 10:23 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

0 250 500 1,000 1,500 2,000 Feet 1:6,000

79°57'51"W 37°19'28"N

**ATTACHMENT 10**

**DEQ Review Comments**



*Commonwealth of Virginia*

***VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY***

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

P.O. Box 1105, Richmond, Virginia 23218

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Ann F. Jennings  
Secretary of Natural and Historic Resources

David K. Paylor  
Director  
(804) 698-4000

November 30, 2021

Susan B. Stafford  
Federal Aviation Administration  
Beckley Airports Field Office  
176 Airport Circle, Rm 101  
Beaver, West Virginia 25813  
Via email: [susan.stafford@faa.gov](mailto:susan.stafford@faa.gov)

RE: Draft Short Environmental Assessment Form for the Proposed Property Acquisition and Future Air Cargo Development, Roanoke-Blacksburg Regional Airport U.S. Federal Aviation Administration, City of Roanoke, (DEQ 21-144F)

Dear Ms. Stafford:

The Commonwealth of Virginia has completed its review of the Draft Short Environmental Assessment (EA) Form dated September 15, 2021 (received November 4, 2021) for the above referenced action. The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of EAs submitted under the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies and locality participated in the review of this proposal:

Department of Environmental Quality  
Department of Conservation and Recreation  
Department of Health  
Department of Historic Resources  
Department of Aviation  
Town of Blacksburg

In addition, the Department of Wildlife Resources, Department of Forestry, and the New River Valley Regional Commission were invited to comment on the proposal.

## PROJECT DESCRIPTION

The Roanoke Regional Airport Commission (RRAC) proposes to acquire a 7.97-acre parcel (Nordt Property) for the future development of an air cargo facility at the Roanoke-Blacksburg Regional Airport (ROA) in the City of Roanoke, Virginia. The Nordt Property site is located at 1420 Coulter Drive NW, southeast of Runway 6-24. The site is partially wooded to the north and includes a manufacturing building, former aircraft hangar, vehicular parking, and grassed/landscaped areas. The site is currently leased and used for jewelry manufacturing.

ROA currently has two cargo tenants, FedEx and UPS. With each tenant conducting two operations per day, five and six days per week respectively, cargo operations account for an estimated 1,144 annual operations, or approximately 2.1 percent of total aircraft operations at ROA. The property to be acquired is located adjacent to existing UPS and FedEx cargo facilities. Future development of the site for air cargo operations is identified in the current Airport Layout Plan which includes construction of an approximately 35,000 square-foot air cargo building, a 33,250 square-foot apron expansion, and a 70,000 square-foot truck dock and vehicular parking lot. The site is also identified for future cargo development on the draft Airport Layout Plan (ALP) being completed as part of the ongoing Master Plan Update.

## CONCLUSION

Provided activities are performed in accordance with the recommendations which follow in the Environmental Impacts and Mitigation section of this report, the Proposed Action is unlikely to have significant effects on ambient air quality, important farmland, forest resources, and wetlands. It is unlikely to adversely affect species of plants or insects listed by state agencies as rare, threatened, or endangered.

## ENVIRONMENTAL IMPACTS AND MITIGATION

**1. Water Quality and Wetlands.** According to the EA (page 25), a wetland investigation was conducted at the project site on October 28, 2021, by a qualified biologist. No jurisdictional wetlands, or other waters of the U.S. (i.e., streams, ponds, etc.) are present on the site. The site consists primarily of maintained turf grass and two commercial buildings with associated impervious parking areas located in the central and southern portions of the site. The northern portion of the site is a forested stand dominated by American elm, black walnuts, and maple trees.

**1(a) Agency Jurisdiction.** The State Water Control Board promulgates Virginia's water regulations covering a variety of permits to include the [Virginia Pollutant Discharge Elimination System Permit](#) regulating point source discharges to surface waters, Virginia Pollution Abatement Permit regulating sewage sludge, storage and land application of biosolids, industrial wastes (sludge and wastewater), municipal wastewater, and animal wastes, the [Surface and Groundwater Withdrawal Permit](#), and the [Virginia Water](#)



Protection (VWP) Permit regulating impacts to streams, wetlands, and other surface waters. The VWP permit is a state permit which governs wetlands, surface water, and surface water withdrawals and impoundments. It also serves as §401 certification of the federal Clean Water Act §404 permits for dredge and fill activities in waters of the U.S. The VWP Permit Program is under the Office of Wetlands and Stream Protection, within the DEQ Division of Water Permitting. In addition to central office staff that review and issue VWP permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities:

- Clean Water Act, §401;
- Section 404(b)(i) Guidelines Mitigation Memorandum of Agreement (2/90);
- State Water Control Law, Virginia Code section 62.1-44.15:20 *et seq.*; and
- State Water Control *Regulations*, 9 VAC 25-210-10.

**1(b) Agency Findings.** The VWP Permit program at the DEQ Blue Ridge Regional Office (BRRO) did not indicate that jurisdictional waters would be impacted by the proposed project.

For additional information, contact the VWP Permit program at DEQ-BRRO, Jay Roberts at (540) 562-6785 or [jesse.roberts@deq.virginia.gov](mailto:jesse.roberts@deq.virginia.gov).

**2. Floodplain Management.** According to the EA (page 25), the proposed project is not located in any 100-year floodplains, as designated by the Federal Emergency Management Agency.

**2(a) Agency Jurisdiction.** The DCR Division of Dam Safety and Floodplain Management (DSFM) is the lead coordinating agency for the Commonwealth's floodplain management program and the National Flood Insurance Program (Executive Order 45). The National Flood Insurance Program (NFIP) is administered by the Federal Emergency Management Agency (FEMA), and communities who elect to participate in this voluntary program manage and enforce the program on the local level through that community's local floodplain ordinance. Each local floodplain ordinance must comply with the minimum standards of the NFIP, outlined in 44 CFR 60.3; however, local communities may adopt more restrictive requirements in their local floodplain ordinance, such as regulating the 0.2% annual chance flood zone (shaded Zone X).

**2(b) Requirements.** All development within a Special Flood Hazard Area (SFHA) or floodplain, as shown on the locality's Flood Insurance Rate Map (FIRM), must be permitted and comply with the requirements of the local floodplain ordinance. Projects conducted by federal agencies within the SFHA must comply with federal Executive Order 11988: Floodplain Management.

DCR's Floodplain Management Program does not have regulatory authority for projects in the SFHA. The applicant/developer must contact the local floodplain administrator for

an official floodplain determination and comply with the community's local floodplain ordinance, including receiving a local permit. Failure to comply with the local floodplain ordinance could result in enforcement action from the locality. RBRA is encouraged to reach out to the local floodplain administrator to ensure compliance with the local floodplain ordinance.

**2(c) Recommendations.** DCR recommends RBRA access the [Virginia Flood Risk Information System \(VFRIS\)](#) to find flood zone information.

For additional information, contact DCR-DSFM, Angela Davis at (804) 371-6135 or [angela.davis@dcr.virginia.gov](mailto:angela.davis@dcr.virginia.gov).

**3. Erosion and Sediment Control and Stormwater Management.** According to the EA (page 26), the proposed project would be constructed in accordance with ROA's existing stormwater pollution prevention plan (SWPPP) and National Pollutant Discharge Elimination Systems (NPDES) permit, which will continue to protect water quality in the vicinity of the airport. During construction, sediment transport and potential impacts to off-site surface waters would be minimized by implementing Best Management Practices (BMPs), such as silt fencing and the use of check dams in ditches to catch sediment.

**3(a) Agency Jurisdiction.** The DEQ [Office of Stormwater Management \(OSWM\)](#) administers the following laws and regulations governing construction activities:

- Virginia Erosion and Sediment Control Law (§ 62.1-44.15:51 *et seq.*) and *Regulations (VESCL&R)* (9 VAC 25-840);
- Virginia Stormwater Management Act (§ 62.1-44.15:24 *et seq.*);
- *Virginia Stormwater Management Program (VSMP) Regulation* (9 VAC 25-870); and
- 2014 General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880).

In addition, DEQ is responsible for the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to Municipal Separate Storm Sewer Systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program (9 VAC 25-890-40).

### **3(b) Requirements.**

#### ***(i) Erosion and Sediment Control Plan***

The applicant is responsible for submitting a project-specific erosion and sediment control (ESC) Plan to the locality in which the project is located for review and approval pursuant to the local ESC requirements, if the project involves a land-disturbing activity

of 10,000 square feet or more. Depending on local requirements the area of land disturbance requiring an ESC Plan may be less. The ESC Plan must be approved by the locality prior to any land-disturbing activity at the project site. All regulated land-disturbing activities associated with the project, including on and off site access roads, staging areas, borrow areas, stockpiles, and soil intentionally transported from the project must be covered by the project specific ESC Plan. Local ESC program requirements must be requested through the locality. [Reference: Virginia Erosion and Sediment Control Law §62.1-44.15 *et seq.*; Virginia Erosion and Sediment Control Regulations 9 VAC 25-840-10 *et seq.*]

***(ii) Stormwater Management Plan***

Depending on local requirements, a Stormwater Management (SWM) Plan may be required. Local SWM program requirements must be requested through the locality. [Reference: Virginia Stormwater Management Act §62.1-44.15 *et seq.*; Virginia Stormwater Management (VSMP) Permit Regulations 9 VAC 25-870-10 *et seq.*]

***(iii) Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (VAR10)***

The owner or operator of projects involving land-disturbing activities of equal to or greater than one acre is required to apply for registration coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP).

- The SWPPP must be prepared prior to submission of the registration statement for coverage under the General Permit.
- The SWPPP must address water quality and quantity in accordance with the *VSMP Permit Regulations*.

General information and registration forms for the General Permit are available on [Construction General Permit](#) webpage. [Reference: Virginia Stormwater Management Act 62.1-44.15 *et seq.*; VSMP Permit Regulations 9 VAC 25-880 *et seq.*].

For additional information, contact DEQ-OSWM, Larry Gavan at (804) 698-4040 or [larry.gavan@deq.virginia.gov](mailto:larry.gavan@deq.virginia.gov).

**4. Air Pollution Control.** According to the EA (page 10), if the project site is developed as an expansion of the existing cargo facilities (FedEx and UPS) or for a new tenant, the facility is not anticipated to result in more than a minimal increase in total aircraft operations or a change in the size of aircraft operating at ROA. Sources of construction-related emissions include the exhaust from heavy equipment, delivery trucks, and construction worker vehicles traveling to and from the site; dust from earthwork/grading; equipment movement on unpaved areas; and, fugitive emissions from the storage/transfer of raw materials (EA, page 11).

**4(a) Agency Jurisdiction.** The [DEQ Air Division](#), on behalf of the State Air Pollution Control Board, is responsible for developing regulations that implement Virginia's Air Pollution Control Law (Virginia Code §10.1-1300 *et seq.*). DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate DEQ regional office is directly responsible for the issuance of necessary permits to construct and operate all stationary sources in the region as well as monitoring emissions from these sources for compliance. As a part of this mandate, EIRs of projects to be undertaken in the state are also reviewed. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

The Air Division regulates emissions of air pollutants from industries and facilities and implements programs designed to ensure that Virginia meets national air quality standards. The most common regulations associated with major State projects are:

- Open burning: 9 VAC 5-130 *et seq.*
- Fugitive dust control: 9 VAC 5-50-60 *et seq.*
- Permits for fuel-burning equipment: 9 VAC 5-80-1100 *et seq.*

**4(b) Agency Findings.** According to the DEQ Air Division, the project site is located in an ozone attainment area.

**4(c) Recommendation.** RRAC should take all reasonable precautions to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOCs), principally by controlling or limiting the burning of fossil fuels.

#### **4(d) Requirements.**

##### ***(i) Fugitive Dust***

Fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 *et seq.* of the *Regulations for the Control and Abatement of Air Pollution*. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and

- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

### ***(ii) Open Burning***

If project activities include the open burning or use of special incineration devices for the disposal of land clearing debris, this activity must meet the requirements of 9 VAC 5-130-10 through 9 VAC 5-130-60 and 9 VAC 5-130-100 of the *Regulations* for open burning, and it may require a permit. The *Regulations* provide for, but do not require, the local adoption of a model ordinance concerning open burning. The project sponsors should contact the appropriate county fire officials to determine what local requirements, if any, exist.

### ***(iii) Fuel-Burning Equipment***

The installation, operation or modification of stationary or portable fuel burning equipment (e.g., generators, wood chippers/grinders, boilers, etc.) or other sources of air pollutants may be subject to registration and/or air permitting requirements. See [Types of Air Permits](#) for additional information.

**5. Solid and Hazardous Wastes and Hazardous Management.** The EA (page 17) states that during the site reconnaissance an ammonia above ground storage tank (AST) was identified in addition to vent pipes for the three underground storage tanks (USTs). No evidence of a release or overfilling was observed. The Airport is currently undertaking the recommended Phase 2 ESA limited subsurface sampling to further investigate potential hazardous waste contamination on site as part of their ongoing due diligence review of the proposed action, with the results being incorporated into the Final EA. The contractor selected to construct the future cargo facility would be responsible for demolition of the existing structures and proper removal of any potentially hazardous materials, including any potential asbestos or lead based paint, in accordance with all local, state, and federal guidelines. Additionally, the AST, UST, incinerator/furnace, and other specialized equipment would be removed from the site prior to demolition or construction activities and properly disposed. Although there are currently no plans for ground disturbance, if encountered during future development of the site, contaminated soils or hazardous materials would be removed and remediated in accordance with local, state, and federal guidelines.

**5(a) Agency Jurisdiction.** On behalf of the Virginia Waste Management Board, the [DEQ Division of Land Protection and Revitalization \(DEQ-DLPR\)](#) is responsible for carrying out the mandates of the Virginia Waste Management Act (Virginia Code §10.1-1400 *et seq.*), as well as meeting Virginia's federal obligations under the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response Compensation Liability Act (CERCLA), commonly known as Superfund.



*Virginia:*

- Virginia Waste Management Act, Virginia Code § 10.1-1400 *et seq.*
- *Virginia Solid Waste Management Regulations*, 9 VAC 20-81 (9 VAC 20-81-620 applies to asbestos-containing materials).
- *Virginia Hazardous Waste Management Regulations*, 9 VAC 20-60 (9 VAC 20-60-261 applies to lead-based paints).
- *Virginia Regulations for the Transportation of Hazardous Materials*, 9 VAC 20-110.

*Federal:*

- Resource Conservation and Recovery Act, 42 U.S. Code sections 6901 *et seq.*
- U.S. Department of Transportation *Rules for Transportation of Hazardous Materials*, 49 Code of Federal Regulations, Part 107
- Applicable rules contained in Title 40, *Code of Federal Regulations*.

DEQ-DLPR also administers laws and regulations on behalf of the State Water Control Board governing Petroleum Storage Tanks (Virginia Code §62.1-44.34:8 *et seq.*), including Aboveground Storage Tanks (9 VAC 25-91 *et seq.*) and Underground Storage Tanks (9 VAC 25-580 *et seq.* and 9 VAC 25-580-370 *et seq.*), also known as ‘Virginia Tank Regulations’, and § 62.1-44.34:14 *et seq.* which covers oil spills.

**5(b) Agency Findings.** DEQ-DLPR staff conducted a search of solid and hazardous waste databases (including petroleum releases) in the project area (200-foot radius) and identified one solid waste site in close proximity which might impact the project.

PMT ID: 900000002700, John C Nordt Co Inc., 1420 Coulter Drive NW,  
Roanoke, Virginia 24012

**5(c) Requirements.**

***(i) Solid and Hazardous Waste Management***

Any soil, sediment or groundwater that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. All construction waste must be characterized in accordance with the *Virginia Hazardous Waste Management Regulations* prior to management at an appropriate facility.

***(ii) Petroleum Contamination***

If evidence of a petroleum release is discovered on site, it must be reported to DEQ-BRRO in accordance with Virginia Code § 62.1-44.34.8 through 9 and 9 VAC 25-580-10 *et seq.* Petroleum-contaminated soils and groundwater that is generated during project

implementation must be characterized and disposed of properly.

**(ii) Asbestos-Containing Materials and Lead-Based Paint**

All structures being demolished, renovated, or removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, state regulations 9 VAC 20-81-620 (ACM) and 9 VAC 20-60-261 (LBP) must be followed.

**5(d) Recommendations.** DEQ-BRRO supports the recommendations in the 2021 Phase I ESA (EA, Attachment 3):

- Complete limited subsurface sampling at a minimum of six locations down-gradient from the on-site UST, as well as a vapor intrusion assessment in the interior and exterior of the building
- Complete surveys for asbestos and lead based paint in on-site structures
- Remove the ammonia AST, UST, incinerator/furnace, and other specialized equipment prior to change of use or demolition/construction.
- Complete a Phase 2 ESA limited subsurface sampling to further investigate potential hazardous waste contamination on site as part of their ongoing due diligence review of the Proposed Action, with the results being incorporated into the Final EA

DEQ-DLPR recommends the implementation of pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

For questions or further information regarding waste comments, contact DEQ-DLPR, Carlos Martinez at (804) 698-4575 or [carlos.martinez@deq.virginia.gov](mailto:carlos.martinez@deq.virginia.gov).

**6. Pesticides and Herbicides.** DEQ recommends that the use of herbicides or pesticides for construction or landscape maintenance should be in accordance with the principles of integrated pest management. The least toxic pesticides that are effective in controlling the target species should be used. Contact the Department of Agriculture and Consumer Services at (804) 786-3501 for more information.

**7. Natural Heritage Resources.** According to the EA (page 12), the U.S. Fish and Wildlife Service (USFWS) Official Species Report did not identify any species that may be affected by the proposed action. The USFWS Information for Planning and Conservation (IPaC) website identified the federal-listed Endangered Indiana Bat (*Myotis sodalis*), Roanoke Logperch (*Percina rex*), Northeastern Bulrush (*Scirpus ancistrochaetus*), Smooth Coneflower (*Echinacea laevigata*), and the federal-listed Threatened Northern Long-eared Bat (*Myotis septentrionalis*), in Roanoke County. Suitable habitat for these species does not occur on the project site. Virginia Fish and

Wildlife Information Service (VaFWIS) identified 13 state-listed threatened or endangered species likely to occur in the vicinity of the project site. However, no observations of listed species were located within a ¼-mile radius of the project site, nor were aquatic or terrestrial habitats for listed species identified.

#### **7(a) Agency Jurisdiction.**

##### ***(i) The Virginia Department of Conservation and Recreation (DCR) Division of Natural Heritage (DNH)***

DNH's mission is conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act (Virginia Code §10.1-209 through 217), authorizes DCR to maintain a statewide database for conservation planning and project review, protect land for the conservation of biodiversity, and the protect and ecologically manage the natural heritage resources of Virginia (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).

##### ***(ii) Virginia Department of Agriculture and Consumer Services (VDACS)***

The Endangered Plant and Insect Species Act of 1979 (Virginia Code Chapter 39 §3.1-1020 through 1030) authorizes VDACS to conserve, protect and manage endangered and threatened species of plants and insects. Under a Memorandum of Agreement established between VDACS and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species.

#### **7(b) Agency Findings.**

##### ***(i) Karst***

DCR-DNH finds that no caves are documented within the footprint of the project, but that this is a region that has caves, sinkholes, disappearing streams, and other related karst features. In addition, DCR-DNH notes that sinkholes in this area have been previously modified by airport construction. The DCR-DNH karst staff screened the project against the Virginia Speleological Survey (VSS) database, the Virginia Department of Energy (VDE) sinkhole coverage and other karst layers for documented sensitive karst features. The project site intersects the karst bedrock and VDE sinkhole screening layers. Sinkholes mapped by VDE are within the project site (see the sinkhole layer on the [Natural Heritage Data Explorer](#)). Typically, additional, smaller unmapped sinkholes can also be present in the vicinity. Sinkholes are areas where surface material has collapsed into the subsurface and into underground watercourses. See DCR-DNH comments attached for additional information.

***(ii) State-listed Plant and Insect Species***

DCR-DNH finds that the activity will not affect any documented state-listed plants or insects at the site.

***(iii) State Natural Area Preserves***

DCR files do not indicate the presence of any State Natural Area Preserves under the agency's jurisdiction in the project vicinity.

**7(c) Recommendations.**

***(i) Karst***

- Avoid the discharge of untreated stormwater runoff to sinkholes.
- Avoid the filling or alteration of natural (pre-existing) sinkholes and designate natural buffers around sinkholes.
- Provide the DCR-DNH Karst Protection Coordinator, Wil Orndorff at (540) 230-5960 or [wil.orndorff@dcr.virginia.gov](mailto:wil.orndorff@dcr.virginia.gov), with detailed location information and copies of design specifications if the project involves filling or "improvement" of sinkholes or cave openings. In cases where sinkhole improvement is for stormwater discharge, copies of VDOT Form EQ-120 will suffice.
- Coordinate with the DCR-DNH Karst Protection Coordinator to document and minimize adverse impacts to karst features such as sinkholes, caves, disappearing streams, and large springs if they are encountered.
- Conduct a thorough geological assessment prior to development of the site. Geophysical surveys are useful tools to evaluate the subsurface of the parcel.
- Stabilize the soil around the site during the construction phase of the project.
- Minimize surface disturbance, implement erosion and sediment control measures appropriate for the location, and adhere to appropriate best management practices to reduce any potential impact to karst, groundwater and surface water resources, as well as any associated fauna and flora.

***(ii) Natural Heritage Resources***

Contact DCR-DNH to secure updated information on natural heritage resources if the scope of the project changes or six months pass before the project is implemented, since new and updated information is continually added to the Biotics Data System.

***(iii) Wildlife Resources and Protected Species***

The Department of Wildlife Resources (DWR) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in DCR's response. Access the

[Virginia Fish and Wildlife Information Service](#) database or contact DWR, Amy Martin at (804) 367-2211 or [amy.martin@dwr.virginia.gov](mailto:amy.martin@dwr.virginia.gov).

**7(d) Requirements.** The discharge of untreated stormwater runoff to sinkholes is discouraged, and sinkholes to which stormwater is diverted or that have been modified to accept stormwater are required by law to be registered as Class 5 Injection Wells with the US Environmental Protection Agency (EPA).

**8. Water Supply.** According to the EA (page 27), there are no surface waters located on or near the proposed site. The closest surface water is Deer Branch Creek, which is located approximately 1 mile east of the project site. Deer Branch Creek and Carvin Creek join and meet Tinker Creek approximately 2.25 miles southeast of the proposed site.

**8(a) Agency Jurisdiction.** The [Virginia Department of Health \(VDH\) Office of Drinking Water \(ODW\)](#) reviews projects for the potential to impact public drinking water sources (groundwater wells, springs and surface water intakes). VDH administers both federal and state laws governing waterworks operation.

**8(b) Agency Findings.** VDH-ODW finds that there are no public groundwater wells within a 1-mile radius of the project site. The Western Virginia Water Authority (PWS ID 2770900) Carvins Cove surface water intake is located within a 5 mile radius of the project site. The project is within the watershed of the public surface water sources for the Town of Clarksville (PWS ID 5117310) Kerr Reservoir Intake, the Town of Altavista (PWS ID 5031050) Staunton River Intake, the Roanoke River Service Authority (PWS ID 5117707 Lake Gaston Intake, and the Smith Mountain Lake Central Water System (PWS ID 5019400) Smith Mountain Lake Intake.

**8(c) Recommendations.** VDH-ODW recommends that Best Management Practices be employed on the project site, including erosion and sediment controls and Spill Prevention Controls and Countermeasures. Materials should be managed while on site and during transport to prevent impacts to nearby surface water.

For additional information, contact VDH-ODW, Arlene Fields Warren at (804) 864-7781 or [arlene.warren@vdh.virginia.gov](mailto:arlene.warren@vdh.virginia.gov).

**9. Historic and Archaeological Resources.** According to the EA (page 18), based on a review of the Virginia Cultural Resources Information System, there are no known archaeological sites, cemeteries, or historic structures or districts located on or adjacent to the project site. Project information was submitted to the Virginia Department of Historic Resources (DHR) to initiate the Determination of Effect Coordination in accordance with Section 106 of the National Historic Preservation Act (NHPA). On January 15, 2021, DHR concurred that no architectural properties eligible for or listed on the National Register of Historic Places would be impacted by the Proposed Action.

**9(a) Agency Jurisdiction.** The [Virginia Department of Historic Resources \(DHR\)](#)



conducts reviews of both federal and state projects to determine their effect on historic properties. Under the federal process, DHR is the State Historic Preservation Office, and ensures that federal undertakings—including licenses, permits, or funding—comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation at 36 CFR Part 800. Section 106 requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. The [DHR Review and Compliance Division](#) has additional information on applicable state and federal laws and how to submit an application for review.

**9(b) Agency Findings.** DHR notes that the Federal Aviation Administration (FAA) consulted with DHR on the proposed action and agency staff concurred with the determination of No Historic Properties Affected.

For additional information, contact DHR, Adrienne Birge-Wilson at (804) 482-6092 or [adrienne.birge-wilson@vdh.virginia.gov](mailto:adrienne.birge-wilson@vdh.virginia.gov).

**10. Aviation Impacts.** According to the EA (page 10), it is assumed that the increase in aircraft operations associated with a future cargo facility would fall within the activity levels projected in the most recent ROA aviation activity forecasts (approved by FAA February 6, 2020). These forecasts project a nominal 1.1 percent average compound growth (2,156 operations) in itinerant air carrier/commuter/air taxi operations from base year (2019) to +10 year (2029). Activity tonnage of cargo/mail is anticipated to increase at approximately 3 percent annually.

**10(a) Agency Jurisdiction.** The [Virginia Department of Aviation \(DoAv\)](#) plans for the development of the state aviation system; promotes aviation; grants aircraft and airports licenses; and provides financial and technical assistance to cities, towns, counties and other governmental subdivisions for the planning, development, construction and operation of airports, and other aviation facilities.

**10(b) Agency Findings.** DoAv finds that the proposed project is located on the airport sponsor's approved Airport Layout Plan (ALP) for near-term development. DoAv previously reviewed a draft of the EA and has no additional comments to provide.

DoAv notes that the review and concurrence with the EA does not constitute a commitment on behalf of DoAv, the Virginia Aviation Board, or the Commonwealth of Virginia to participate in the funding of any project.

For additional information, contact DoAv, Stephen Smiley at (804) 236-3627 or [stephen.smiley@doav.virginia.gov](mailto:stephen.smiley@doav.virginia.gov).

## **11. Local Review.**

**11(a) Agency Jurisdiction.** Virginia Code §15.2-2202.A, requires that DEQ distribute a copy of the submitted EIR to the chief administrative officer of every locality in which

each the project is proposed to be located. The purpose of the distribution is to enable the locality to evaluate the proposed project for environmental impact, consistency with the locality's comprehensive plan, local ordinances adopted pursuant to this chapter and other applicable law and to provide the locality with an opportunity to comment. DEQ is required to distribute the reports to localities, solicit their comments and consider their responses in substantially the same manner as the department solicits and receives comments from state agencies.

**11(b) Agency Findings.** The Town of Blacksburg (one of the airport's namesakes) notes that the airport is located in the City of Roanoke. Therefore, the town has no specific comments.

For additional information, contact the Town of Blacksburg, Maeve Gould at (540) 443-1308 or [mgould@blacksburg.gov](mailto:mgould@blacksburg.gov).

**12. Pollution Prevention.** DEQ advocates that principles of pollution prevention and sustainability be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices will help to ensure that environmental impacts are minimized. However, pollution prevention and sustainability techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source.

**12(a) Recommendations.** We have several pollution prevention recommendations that may be helpful in the construction and maintenance of the facility:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed project is committed to complying with environmental regulations, reducing risk, minimizing environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes proponents with effective Environmental Management Systems through its Virginia Environmental Excellence Program (VEEP). VEEP provides recognition, annual permit fee discounts, and the possibility for alternative compliance methods.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitment to the environment when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for construction and design.
- Integrate pollution prevention techniques into maintenance and operations, to include inventory control for centralized storage of hazardous materials.

Maintenance facilities should have sufficient and suitable space to allow for effective inventory control and preventive maintenance.

DEQ's Office of Pollution Prevention provides information and technical assistance relating to pollution prevention techniques and EMS. If interested, please contact Meghann Quinn at (804) 698-4021 or [meghann.quinn@deq.virginia.gov](mailto:meghann.quinn@deq.virginia.gov).

**13. Energy Conservation.** The facility should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. The commonwealth encourages architectural and engineering designers to recognize and incorporate the energy, environmental, and sustainability concepts listed in the Leadership in Energy and Environmental Design (LEED) Green Building Rating System into the development and procurement of their projects.

The energy efficiency of the facility can be enhanced by maximizing the use of the following:

- thermally-efficient building shell components (roof, wall, floor, windows, and insulation);
- high efficiency heating, ventilation, air conditioning systems;
- high efficiency lighting systems and daylighting techniques; and
- energy-efficient appliances.

Contact the Department of Mines, Minerals and Energy, David Spears at (434) 951-6350 or [david.spears@dmme.virginia.gov](mailto:david.spears@dmme.virginia.gov), for assistance in meeting this challenge.

**14. Water Conservation.** The following recommendations will result in reduced water use associated with the operation of the facility:

- Grounds should be landscaped with hardy native plant species to conserve water as well as lessen the need to use fertilizers and pesticides.
- Convert turf to low water-use landscaping such as drought resistant grass, plants, shrubs and trees.
- Low-flow toilets should be installed in new facilities.
- Consider installing low flow restrictors and aerators to faucets.
- Improve irrigation practices by:
  - upgrading sprinkler clock; water at night, if possible, to reduce evapotranspiration (lawns need only 1 inch of water per week, and do not need to be watered daily; overwatering causes 85% of turf problems);
  - installing a rain shutoff device; and
  - collecting rainwater with a rain bucket or cistern system with drip lines.
- Use new high-efficiency washers and dishwashers to reduce water usage by 30-50% per use.
- Check for and repair leaks (toilets and faucets) during regular routine maintenance activities.

## REGULATORY AND COORDINATION NEEDS

**1. Floodplain Management.** The proposed project must comply with local floodplain management ordinances. Local floodplain administrator contact information may be found in DCR's [Local Floodplain Management Directory](#).

### **2. Erosion and Sediment Control and Stormwater Management.**

**2(a) Erosion and Sediment Control and Stormwater Management Plans.** The proposed development must comply with *Virginia's Erosion and Sediment Control Law* (Virginia Code § 62.1-44.15:61) and *Regulations* (9 VAC 25-840-30 *et seq.*) and *Stormwater Management Law* (Virginia Code § 62.1-44.15:31) and *Regulations* (9 VAC 25-870-210 *et seq.*) as locally administered. Land-disturbing activities of 10,000 square feet or more would be regulated. Local erosion and sediment control and stormwater management requirements should be coordinated with the City of Roanoke Department Planning, Building and Development at (540) 853-5796.

**2(b) General Permit for Stormwater Discharges from Construction Activities (VAR10).** For land-disturbing activities of equal to or greater than one acre, the applicant is required to apply for registration coverage under the Virginia Stormwater Management Program General Permit for Discharges of Stormwater from Construction Activities (9 VAC 25-880-1 *et seq.*). Specific questions regarding the Stormwater Management Program requirements should be directed to the City of Roanoke Department Planning, Building and Development at (540) 853-5796

**3. Air Quality Regulations.** This project may be subject to air regulations administered by the Department of Environmental Quality. The following sections of Virginia Administrative Code are applicable:

- 9 VAC 5-50-60 *et seq.* governing fugitive dust emissions; and
- 9 VAC 5-130 *et seq.*, for open burning.

Fuel burning equipment (e.g. chippers and generators) to be used may require permitting from DEQ in accordance with 9 VAC 5-80, Article 6, *Permits for New and Modified Sources*. For more information contact the DEQ-BRRO, Paul Jenkins at (540) 562-6822 or [paul.jenkins@deq.virginia.gov](mailto:paul.jenkins@deq.virginia.gov). Also, should the project involve open burning, contact Roanoke fire officials for information on any local requirements.

**4. Solid and Hazardous Wastes.** All solid waste, hazardous waste, and hazardous materials must be managed in accordance with all applicable federal, state, and local environmental regulations. Contact DEQ-BRRO, David Miles at (540) 562-6741 or [david.miles@deq.virginia.gov](mailto:david.miles@deq.virginia.gov), concerning the location and availability of suitable waste management facilities in the project area or if free product, discolored soils, or other evidence of contaminated soils are encountered.



**4(a) Asbestos-Containing Material.** Any structures to be demolished must be thoroughly inspected for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. Upon classification as friable or non-friable, all asbestos-containing material shall be disposed of in accordance with the *Virginia Solid Waste Management Regulations* (9 VAC 20-81 *et seq.*) and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 *et seq.*). Contact the DEQ-BRRO, David Miles at (540) 562-6741 or [david.miles@deq.virginia.gov](mailto:david.miles@deq.virginia.gov) and the Department of Labor and Industry, Doug Wiggins at (540) 562-3580, ext. 131 or [richard.wiggins@doli.virginia.gov](mailto:richard.wiggins@doli.virginia.gov) for additional information.

**4(b) Lead-Based Paint.** If applicable, this project must comply with the U.S. Department of Labor Occupational Safety and Health Administration (OSHA) regulations and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements, contact the Department of Professional and Occupational Regulation at (804) 367-8500.

**4(c) Petroleum Storage Tanks.** If petroleum storage tanks are to be removed or replaced or if petroleum-contaminated soils or water are encountered during excavation, contact DEQ-BRRO, David Miles at (540) 562-6741 or [david.miles@deq.virginia.gov](mailto:david.miles@deq.virginia.gov).

## **5. Natural Heritage Resources.**

**5(a) Karst Features.** Should it be determined that karst features would be impacted by future development, contact the DCR-DNH Karst Protection Coordinator, Wil Orndorff at (540) 230-5960 or [wil.orndorff@dcr.virginia.gov](mailto:wil.orndorff@dcr.virginia.gov), with detailed location information and copies of design specifications of impacted sinkholes or cave openings.

**5(b) Natural Heritage Resources Updates.** Contact DCR-DNH, Rene Hypes at (804) 371-2708 or [rene.hypes@dcr.virginia.gov](mailto:rene.hypes@dcr.virginia.gov), to secure updated information on natural heritage resources if the scope of the project changes and/or six months passes before the project is implemented, since new and updated information is continually added to the Biotics Data System.

**5(c) Wildlife Resources and Protected Species.** Access the [Virginia Fish and Wildlife Information Service](#) database or contact DWR, Amy Martin at (804) 367-2211 or [amy.martin@dwr.virginia.gov](mailto:amy.martin@dwr.virginia.gov), for additional information on wildlife and listed species in the area.

Thank you for the opportunity to review the Draft Short Environmental Assessment form for the Property Acquisition and Future Air Cargo Development at the Roanoke-Blacksburg Regional Airport in the City of Roanoke. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4204 or John Fisher at (804) 698-4339 for clarification of these comments.

Sincerely,

A handwritten signature in black ink that reads "Bettina Rayfield". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Bettina Rayfield, Program Manager  
Environmental Impact Review and Long-Range  
Priorities

Enclosures

Ec: Amy Martin, DWR  
Robbie Rhur, DCR  
Arlene Fields Warren, VDH  
Terry Lasher, DOF  
Roger Kirchen, DHR  
Rusty Harrington, DoAv  
Maeve Gould, City of Roanoke  
Kevin Byrd, NRVRC  
Laura Stevens, Parrish & Partners, LLC



**COMMONWEALTH of VIRGINIA**  
DEPARTMENT OF CONSERVATION AND RECREATION

**MEMORANDUM**

DATE: November 23, 2021

TO: John Fisher, DEQ

FROM: Roberta Rhur, Environmental Impact Review Coordinator

SUBJECT: DEQ 21-144F, Property Acquisition and Future Air Cargo Development

**Division of Natural Heritage**

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

This project is situated on karst-forming carbonate rock and can be characterized by sinkholes, caves, disappearing streams, and large springs. The Virginia DCR, Division of Natural Heritage karst staff screened this project against the Virginia Speleological Survey (VSS) database, the Virginia Department of Energy (VDE) sinkhole coverage, and other karst layers for documented sensitive karst features.

This project has intersected the karst bedrock and VDE sinkhole screening layers. Sinkholes mapped by the Virginia Department of Energy are within the project site (see Sinkhole layer on the Natural Heritage Data Explorer at [vanhde.org](http://vanhde.org)). Typically, additional, smaller unmapped sinkholes can also be present in the vicinity. Sinkholes are areas where surface material has collapsed into the subsurface and into underground watercourses. Sinkhole areas are places where surface water directly affects groundwater quality and flow. What goes into sinkholes comes out in wells and springs, and can degrade drinking water, springs and spring-fed surface waters, and the habitat of subterranean creatures. Discharge of untreated stormwater runoff to sinkholes is discouraged, and sinkholes to which stormwater is diverted or which have been modified to accept stormwater are required by law to be registered as Class 5 Injection Wells with the US Environmental Protection Agency. Filling or alteration of natural (pre-existing) sinkholes is discouraged, and designation of natural buffers around sinkholes is desirable. If the project involves filling or "improvement" of sinkholes or cave openings, DCR would like detailed location information and copies of the design specifications. In cases where sinkhole improvement is for storm water discharge, copies of VDOT Form EQ-120 will suffice.

No caves are documented within the footprint of this project, but this is a region that has caves, sinkholes and other related karst features. Sinkholes in this area have been previously modified by airport construction. DCR recommends that if development at this location occurs, a thorough geological assessment takes place. Geophysical surveys could also be useful tools to evaluate the subsurface on this parcel. During every phase of the project, DCR recommends the stabilization of the soil around the site. Minimizing surface disturbance, strict

use of E&S control measures appropriate for the location and adherence to best management practices appropriate for karst will help to reduce any potential impact to the karst, groundwater and surface water resources as well as any associated fauna and flora.

If karst features such as sinkholes, caves, disappearing streams, and large springs are encountered during the project, please coordinate with Wil Orndorff (540-230-5960, [Wil.Orndorff@dcr.virginia.gov](mailto:Wil.Orndorff@dcr.virginia.gov)) the Virginia DCR, Division of Natural Heritage Karst Protection Coordinator, to document and minimize adverse impacts. Activities such as discharge of runoff to sinkholes or sinking streams, filling of sinkholes, and alteration of cave entrances can lead to environmental impacts including surface collapse, flooding, erosion and sedimentation, contamination of groundwater and springs, and degradation of subterranean habitat for natural heritage resources (e.g. cave adapted invertebrates, bats). These potential impacts are not necessarily limited to the immediate project area, as karst systems can transport water and associated contaminants rapidly over relatively long distances, depending on the nature of the local karst system. If the project involves filling or “improvement” of sinkholes or cave openings, DCR would like detailed location information and copies of the design specifications. In cases where sinkhole improvement is for storm water discharge, copies of VDOT Form EQ-120 will suffice.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR’s jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please re-submit a completed order form and project map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Wildlife Resources (VDWR) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Amy Martin at (804-367-2211) or [amy.martin@dwr.virginia.gov](mailto:amy.martin@dwr.virginia.gov).

#### Division of Dam Safety and Floodplain Management

##### Floodplain Management Program:

The National Flood Insurance Program (NFIP) is administered by the Federal Emergency Management Agency (FEMA), and communities who elect to participate in this voluntary program manage and enforce the program on the local level through that community’s local floodplain ordinance. Each local floodplain ordinance must comply with the minimum standards of the NFIP, outlined in 44 CFR 60.3; however, local communities may adopt more restrictive requirements in their local floodplain ordinance, such as regulating the 0.2% annual chance flood zone (Shaded X Zone).

All development within a Special Flood Hazard Area (SFHA), as shown on the locality’s Flood Insurance Rate Map (FIRM), must be permitted and comply with the requirements of the local floodplain ordinance.

##### State Agency Projects Only

Executive Order 45, signed by Governor Northam and effective on November 15, 2019, establishes mandatory standards for development of state-owned properties in Flood-Prone Areas, which include



Special Flood Hazard Areas, Shaded X Zones, and the Sea Level Rise Inundation Area. These standards shall apply to all state agencies.

1. Development in Special Flood Hazard Areas and Shaded X Zones
  - A. All development, including buildings, on state-owned property shall comply with the locally-adopted floodplain management ordinance of the community in which the state-owned property is located and any flood-related standards identified in the Virginia Uniform Statewide Building Code.
  - B. If any state-owned property is located in a community that does not participate in the NFIP, all development, including buildings, on such state-owned property shall comply with the NFIP requirements as defined in 44 CFR §§ 60.3, 60.4, and 60.5 and any flood-related standards identified in the Virginia Uniform Statewide Building Code.
    - (1) These projects shall be submitted to the Department of General Services (DGS), for review and approval.
    - (2) DGS shall not approve any project until the State NFIP Coordinator has reviewed and approved the application for NFIP compliance.
    - (3) DGS shall provide a written determination on project requests to the applicant and the State NFIP Coordinator. The State NFIP Coordinator shall maintain all documentation associated with the project in perpetuity.
  - C. No new state-owned buildings, or buildings constructed on state-owned property, shall be constructed, reconstructed, purchased, or acquired by the Commonwealth within a Special Flood Hazard Area or Shaded X Zone in any community unless a variance is granted by the Director of DGS, as outlined in this Order.

The following definitions are from Executive Order 45:

*Development for NFIP purposes is defined in 44 CFR § 59.1 as “Any man-made change to improved or unimproved real estate, including but not limited to buildings or other structures, mining, dredging, filling, grading, paving, excavation or drilling operations or storage of equipment or materials.”*

*The Special Flood Hazard Area may also be referred to as the 1% annual chance floodplain or the 100-year floodplain, as identified on the effective Flood Insurance Rate Map and Flood Insurance Study. This includes the following flood zones: A, AO, AH, AE, A99, AR, AR/AE, AR/AO, AR/AH, AR/A, VO, VE, or V.*

*The Shaded X Zone may also be referred to as the 0.2% annual chance floodplain or the 500- year floodplain, as identified on the effective Flood Insurance Rate Map and Flood Insurance Study.*

*The Sea Level Rise Inundation Area referenced in this Order shall be mapped based on the National Oceanic and Atmospheric Administration Intermediate-High scenario curve for 2100, last updated in 2017, and is intended to denote the maximum inland boundary of anticipated sea level rise.*

*“State agency” shall mean all entities in the executive branch, including agencies, offices, authorities, commissions, departments, and all institutions of higher education.*

*“Reconstructed” means a building that has been substantially damaged or substantially improved, as defined by the NFIP and the Virginia Uniform Statewide Building Code.*

Federal Agency Projects Only

Projects conducted by federal agencies within the SFHA must comply with federal Executive Order 11988: Floodplain Management.

DCR's Floodplain Management Program does not have regulatory authority for projects in the SFHA. The applicant/developer must contact the local floodplain administrator for an official floodplain determination and comply with the community's local floodplain ordinance, including receiving a local permit. Failure to comply with the local floodplain ordinance could result in enforcement action from the locality. For state projects, DCR recommends that compliance documentation be provided prior to the project being funded. For federal projects, the applicant/developer is encouraged reach out to the local floodplain administrator and comply with the community's local floodplain ordinance.

To find flood zone information, use the Virginia Flood Risk Information System (VFRIS): [www.dcr.virginia.gov/vfris](http://www.dcr.virginia.gov/vfris)

To find community NFIP participation and local floodplain administrator contact information, use DCR's Local Floodplain Management Directory: [www.dcr.virginia.gov/dam-safety-and-floodplains/floodplain-directory](http://www.dcr.virginia.gov/dam-safety-and-floodplains/floodplain-directory)

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

Cc: Wil Orndorff, DCR-Karst





*Commonwealth of Virginia*

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**BLUE RIDGE REGIONAL OFFICE**

901 Russell Drive, Salem, Virginia 24153

(540) 562-6700 FAX (804) 698-4178

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Ann F. Jennings  
Secretary of Natural and Historic Resources

David K. Paylor  
Director  
(804) 698-4000

Robert J. Weld  
Regional Director

November 29, 2021

Mr. John Fisher  
Department of Environmental Quality  
Office of Environmental Impact Review  
1111 East Main Street  
Richmond, VA 23219

Re: EIR Comments: USDOT/FAA - Property Acquisition and Air Cargo Development;  
Project Number: 21-144F

Dear Mr. Fisher:

The Blue Ridge Regional Office (BRRO) of the Virginia Department of Environmental Quality has completed its review of the Environmental Impact Review for the "Property Acquisition and Air Cargo Development". The project sponsor is USDOT/FAA. BRRO comments are as follows:

BRRO supports the recommendations in the 2021 Phase I ESA:

- Complete limited subsurface sampling at a minimum of six locations downgradient from the on-site UST, as well as a vapor intrusion assessment in the interior and exterior of the building
- Complete surveys for asbestos and lead based paint in on-site structures
- Remove the ammonia AST, UST, incinerator/furnace, and other specialized equipment prior to change of use or demolition/construction.
- Complete a Phase 2 ESA limited subsurface sampling to further investigate potential hazardous waste contamination on site as part of their ongoing due diligence review of the Proposed Action, with the results being incorporated into the Final EA

For information regarding AST and UST requirements please contact David Miles, DEQ BRRO Petroleum Program Manager, at (540) 562-6741 or [David.Miles@deq.virginia.gov](mailto:David.Miles@deq.virginia.gov).

Water

If the combined land disturbance in a common plan of development is 10,000 sq. ft or greater an Erosion and Sediment Control Plan is required. Similarly, if the combined disturbance in a common plan of development is 1.0 acres or greater a General VPDES for Discharges of Stormwater from Construction Activities is required. If there are any questions regarding applicability contact Jay Roberts, DEQ BRRO Stormwater & Wetlands Manager, at (540) 562-6785 or [jesse.roberts@deq.virginia.gov](mailto:jesse.roberts@deq.virginia.gov).



If you have any questions or comments related to this review, please do not hesitate to contact me by phone at 540-562-6788 or email at [kevin.harlow@deq.virginia.gov](mailto:kevin.harlow@deq.virginia.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin A. Harlow".

Kevin A. Harlow  
Regional EIR Coordinator



MEMORANDUM

TO: John Fisher, DEQ/EIR Environmental Program Planner

FROM: Carlos A. Martinez, Division of Land Protection & Revitalization Review Coordinator

DATE: November 18, 2021

COPIES: Sanjay Thirunagari, Division of Land Protection & Revitalization Review Manager; file

SUBJECT: Environmental Impact Review: 21-144F Property Acquisition and Future Air Cargo Development in the Town of Blacksburg, Virginia.

The Division of Land Protection & Revitalization (DLPR) has completed its review of the USDOT/Federal Aviation Administration's November 4, 2021 EIR for Property Acquisition and Future Air Cargo Development in the Town of Blacksburg, Virginia.

DLPR staff conducted a search (200 ft. radius) of the project area of solid and hazardous waste databases (including petroleum releases) to identify waste sites in close proximity to the project area. DLPR identified one (1) solid waste permit within the project area which might impact the project.

DLPR staff has reviewed the submittal and offers the following comments:

**Hazardous Waste/RCRA Facilities – none in close proximity to the project area**

**CERCLA Sites – none in close proximity to the project area**

**Formerly Used Defense Sites (FUDS) – none in close proximity to the project area.**

**Solid Waste – One (1) in close proximity to the project area**

- 1. PMT ID: 900000002700, John C Nordt Co Inc, 1420 Coulter Dr NW, Roanoke, Virginia 24012.**

**Virginia Remediation Program (VRP) – none in close proximity to the project area**

**Petroleum Releases – none in close proximity to the project area**

**PROJECT SPECIFIC COMMENTS**

None

**GENERAL COMMENTS**

**Soil, Sediment, Groundwater, and Waste Management**

Any soil, sediment or groundwater that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Part 107.

**Asbestos and/or Lead-based Paint**

All structures being demolished/renovated/removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-81-620 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions may be directed to the DEQ's Blue Ridge Regional Office at (540) 562-6700.

**Pollution Prevention – Reuse - Recycling**

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Carlos A. Martinez by phone at (804) 698-4575 or email [carlos.martinez@deq.virginia.gov](mailto:carlos.martinez@deq.virginia.gov).

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**Re: NEW PROJECT EXPEDITED REVIEW FAA Property Acquisition and Future Air Cargo, DEQ 21-144F**

1 message

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**Gavan, Lawrence** <larry.gavan@deq.virginia.gov>  
To: "Fisher, John" <john.fisher@deq.virginia.gov>

Mon, Nov 8, 2021 at 12:51 PM

**(a) Agency Jurisdiction.** The DEQ administers the nonpoint source pollution control enforceable policy of the VCP through the *Virginia Erosion and Sediment Control Law and Regulations (VESCL&R)* and *Virginia Stormwater Management Law and Regulations (VSWML&R)*.

**(b) Erosion and Sediment Control Plan.** The Applicant is responsible for submitting a project-specific erosion and sediment control (ESC) plan to the locality in which the project is located for review and approval pursuant to the local ESC requirements, if the project involves a land-disturbing activity of 10,000 square feet or more (2,500 square feet or more in a Chesapeake Bay Preservation Area). Depending on local requirements the area of land disturbance requiring an ESC plan may be less. The ESC plan must be approved by the locality prior to any land-disturbing activity at the project site. All regulated land-disturbing activities associated with the project, including on and off site access roads, staging areas, borrow areas, stockpiles, and soil intentionally transported from the project must be covered by the project specific ESC plan. Local ESC program requirements must be requested through the locality. [Reference: *Virginia Erosion and Sediment Control Law* §62.1-44.15 et seq.; *Virginia Erosion and Sediment Control Regulations* 9VAC25-840-10 et seq.]

**(c) Stormwater Management Plan.** Depending on local requirements, a Stormwater Management (SWM) plan may be required. Local SWM program requirements must be requested through the locality. [Reference: *Virginia Stormwater Management Act* §62.1-44.15 et seq.; *Virginia Stormwater Management (VSMP) Permit Regulations* 9VAC25-870-10 et seq.]

**(d) General Permit for Stormwater Discharges from Construction Activities (VAR10).** DEQ is responsible for the issuance, denial, revocation, termination and enforcement of the Virginia Stormwater Management Program (VSMP) General Permit for Stormwater Discharges from Construction Activities related to municipal separate storm sewer systems (MS4s) and construction activities for the control of stormwater discharges from MS4s and land disturbing activities under the Virginia Stormwater Management Program.

The operator or owner of a construction project involving land-disturbing activities equal to or greater than 1 acre is required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the General Permit and the SWPPP must address water quality and quantity in accordance with the *VSMP Permit Regulations*.  
(Reference: VSWML 62.1-44.15 et seq.; VSMP Permit Regulations 9VAC 25-880 et seq.)

Larry Gavan  
(804) 698-4040  
[larry.gavan@deq.virginia.gov](mailto:larry.gavan@deq.virginia.gov)



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**Re: NEW PROJECT EXPEDITED REVIEW FAA Property Acquisition and Future Air Cargo, DEQ 21-144F**

1 message

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**Birge-wilson, Adrienne** <adrienne.birge-wilson@dhr.virginia.gov>  
To: John Fisher <John.Fisher@deq.virginia.gov>

Mon, Nov 22, 2021 at 1:37 PM

John- As noted on page 18 of the EA, FAA consulted with DHR on this already and we concurred with their determination of No Historic Properties Affected (see attached).

V/R,

**Adrienne Birge-Wilson**  
Review and Compliance Division  
Virginia Department of Historic Resources  
[2801 Kensington Avenue](#)  
[Richmond, VA 23221](#)  
(804) 482-6092  
[adrienne.birge-wilson@dhr.virginia.gov](mailto:adrienne.birge-wilson@dhr.virginia.gov)

**COVID-19 Update: DHR is open for business and the majority of staff is teleworking. Please see our current [Phase III Guidelines for staff and visitors.](#)**

Follow DHR on [Facebook](#), [Twitter](#), and [Instagram](#)  
Also, please [Subscribe to DHR's Quarterly Newsletter](#)



# commonwealth of virginia

Mark K. Flynn  
Director

**Department of Aviation**  
5702 Gulfstream Road  
Richmond, Virginia 23250-2422

V/TDD – (804) 236-3624  
FAX – (804) 236-3635

November 19, 2021

John Fisher  
Department of Environmental Quality  
Office of Environmental Impact Review  
P.O. Box 1105  
Richmond, VA 23218

**RE: Roanoke-Blacksburg Regional Airport Property Acquisition and Future Air Cargo, DEQ 21-144F**

Dear Mr. Fisher,

The Virginia Department of Aviation (“DOAV”) has received and reviewed the Draft Short Form Environmental Assessment (“EA”) for the Nordt property acquisition at Roanoke-Blacksburg Regional Airport.

The proposed project is located on the airport sponsor’s approved Airport Layout Plan (“ALP”) for near-term development and DOAV has previously reviewed a draft of the EA. As such, the Department has no additional comments to provide.

The review and concurrence with the Draft EA in no way constitutes a commitment on behalf of the Department of Aviation, the Virginia Aviation Board, or the Commonwealth of Virginia to participate in the funding of any project.

Sincerely,  
Stephen Smiley

Stephen Smiley  
Senior Aviation Planner

---

**Re: NEW PROJECT EXPEDITED REVIEW FAA Property Acquisition and Future Air Cargo, DEQ 21-144F**

1 message

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**Warren, Arlene** <arlene.warren@vdh.virginia.gov>  
To: John Fisher <john.fisher@deq.virginia.gov>  
Cc: rr Environmental Impact Review <eir@deq.virginia.gov>

Mon, Nov 8, 2021 at 1:04 PM

**Project Name: Property Acquisition and Future Air Cargo Development****Project #: 21-144 F**

UPC #: N/A

**Location: Town of Blacksburg**

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to **public drinking water sources** (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems **must be verified by the local utility**.

There are no public groundwater wells within a 1-mile radius of the project site.

The following surface water intakes are located within a 5 mile radius of the project site:

PWS ID Number	System Name	Facility Name
2770900	WESTERN VIRGINIA WATER AUTHORITY	CARVINS COVE

The project is within the watershed of the following public surface water sources:

PWS ID Number	System Name	Facility Name
5117310	CLARKSVILLE, TOWN OF	KERR RESERVOIR INTAKE
5031050	ALTAVISTA, TOWN OF	STAUNTON RIVER
5117707	ROANOKE RIVER SERVICE AUTHORITY	LAKE GASTON INTAKE
5019400	SMITH MT. LAKE CENTRAL WATER SYSTEM	SMITH MOUNTAIN LAKE

Best Management Practices should be employed, including Erosion & Sedimentation Controls and Spill Prevention Controls & Countermeasures on the project site.

Materials should be managed while on site and during transport to prevent impacts to nearby surface water.

*The Virginia Department of Health – Office of Drinking Water appreciates the opportunity to provide comments. If you have any questions, please let me know.*

Best Regards,

Arlene Fields Warren

**GIS Program Support Technician**

**Office of Drinking Water**

**Virginia Department of Health**

November 22, 2021

Mr. John Fisher  
Virginia Department of Environmental Quality  
Office of Environmental Impact Review  
P.O. Box 1105  
Richmond, Virginia 23218

SUBJECT: DEQ Project: #21-144F Property Acquisition and Future Air Cargo  
Development

Dear Mr. Fisher:

Thank you for the opportunity to comment on this project. The proposed projects, Property Acquisition and Future Air Cargo Development, are located in Roanoke, Virginia and not within the Town of Blacksburg limits. Therefore, the Town has no specific comments on the Environmental Impact Review.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Maeve Gould, AICP, Comprehensive Planner  
Town of Blacksburg



**ATTACHMENT 11**

**Public Involvement**

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

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

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

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

Thank you,

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

# **Notice of Availability of a Short Environmental Assessment Form for the proposed Property Acquisition & Future Air Cargo Development at Roanoke-Blacksburg Regional Airport**

**Availability of the Environmental Assessment** – The Roanoke-Blacksburg Regional Airport (ROA) is required under the provisions of the *National Environmental Policy Act of 1969*, the *Airport and Airway Safety and Capacity Expansion Acts of 1987*, and Federal Aviation Administration (FAA) requirements to prepare an Environmental Assessment (EA) for the proposed Nordt Property Acquisition and Future Air Cargo Development at the Airport, to include an air cargo building/truck dock, apron expansion, and vehicular parking lot. Consultants, acting on behalf of ROA, have prepared an EA describing the anticipated environmental impacts associated with this proposed future project. A draft report has been prepared describing the study's findings and will be available on or about October 17, 2021. Comments on the document will be accepted for 30 days, ending on November 16, 2021. Any person desiring to review the EA may do so on the Airport's website at <https://www.flyroa.com/airport-info>, or during normal working hours on or after October 17, 2021, at the following locations:

Roanoke Regional Airport Commission  
Roanoke-Blacksburg Regional Airport  
5202 Aviation Drive  
Roanoke, VA 24012

South County Library  
Reference Desk  
6303 Merriman Road  
Roanoke, VA 24018-0798

For further information about the project, please contact:

Ms. Laura Stevens, AICP  
Senior Environmental Planner  
Parrish and Partners, LLC  
140 Stoneridge Drive, Suite 500  
Columbia, SC 29210  
[lstevens@parrishandpartners.com](mailto:lstevens@parrishandpartners.com)  
(803) 978-7611

Ms. Susan Stafford  
Environmental Protection Specialist  
Federal Aviation Administration  
Beckley Airports Field Office  
176 Airport Circle, Rm 101  
Beaver, WV 25813  
(304) 252-6216, Ext.130

**The Roanoke Times**

Roanoke, Virginia  
Affidavit of Publication

Account Number

6132561

Date

October 17, 2021

PARRISH AND PARTNERS, LLC  
Attn LAURA STEVENS, AICP  
140 STONERIDGE DRIVE, SUITE 500  
COLUMBIA, SC 29210

Date	Category	Description	Ad Size	Total Cost
10/26/2021	Legal Notices	Notice of Availability of a Short Environmental Assessment Forr	1 x 85 L	526.45

**Publisher of the  
Roanoke Times**

I, (the undersigned) an authorized representative of the  
Roanoke Times, a daily newspaper published in Roanoke, in the  
State of Virginia, do certify that the annexed notice Notice of  
Availability of was published in said newspapers on the following  
dates:

10/17/2021

The First insertion being given ... 10/17/2021

Newspaper reference: 0001269516

*Brenda Brun*

Billing Representative

Sworn to and subscribed before me this 17th Day of October 2021

*John R. Carstensen*

Notary Public

State of Virginia  
County of Hanover  
My Commission expires





**Notice of Availability of a  
Short Environmental  
Assessment Form for the  
proposed Property  
Acquisition & Future Air  
Cargo Development  
at Roanoke-Blacksburg  
Regional Airport**

**Availability of the Environmental Assessment** – The Roanoke-Blacksburg Regional Airport (ROA) is required under the provisions of the National Environmental Policy Act of 1969, the Airport and Airway Safety and Capacity Expansion Acts of 1987, and Federal Aviation Administration (FAA) requirements to prepare an Environmental Assessment (EA) for the proposed Nordt Property Acquisition and Future Air Cargo Development at the Airport, to include an air cargo building/truck dock, apron expansion, and vehicular parking lot. Consultants, acting on behalf of ROA, have prepared an EA describing the anticipated environmental impacts associated with this proposed future project. A draft report has been prepared describing the study's findings and will be available on or about October 17, 2021. Comments on the document will be accepted for 30 days, ending on November 16, 2021. Any person desiring to review the EA may do so on the Airport's website at <https://www.flyroa.com/airport-info>, or during normal working hours on or after October 17, 2021, at the following locations:

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Roanoke-Blacksburg Regional Airport  
5202 Aviation Drive  
Roanoke, VA 24012

South County Library  
Reference Desk  
6303 Merriman Road  
Roanoke, VA 24018-0798

For further information about the project, please contact:

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