

# **APPENDIX J**

## **RESPONSES TO COMMENTS**

This appendix contains the following:

- Index of Draft EA Comments
- Agency and Public Comments Received on the Draft EA
- Responses to Draft EA Comments

## J.1 Comments Received on the Draft EA

All of the comments received during the Draft EA comment period (January 25, 2023 to March 13, 2023) from federal, state, and local agencies, organizations, and individuals were collected and reviewed by the Federal Aviation Administration (FAA), the US Army Corps of Engineers (USACE), and the Raleigh Durham Airport Authority (Airport Authority) in their entirety. The comments received were identified as either agency or public comments. There were four agency comment submissions<sup>1</sup>. Agency comments were categorized as (AC) and numbered sequentially. There were three different types of public comments received (workshop comments, transcript comments, and email comments). During the Public Workshop/ Hearing for the Draft EA held on February 28, 2023, between 5:00 p.m. and 7:00 p.m., six workshop comment forms were collected. These public workshop comments were categorized as (WC) and numbered sequentially. Also, during the Public Workshop / Hearing, 13 people offered verbal comments to a court reporter. These public transcript comments were categorized as (TC) and numbered sequentially. There were also 68 public email comments categorized as (EC) and numbered sequentially. The Airport Authority and the FAA then generally categorized and grouped the comments received on the Draft EA into major topics. Some comments may refer to more than one major topic. The Draft EA comments received fell into 16 major topics:

1. General Comments
2. Proposed Action
3. Purpose and Need
4. Alternatives
5. William B. Umstead State Park
6. Noise
7. Biological Resources
8. Air Quality/Climate
9. Water Resources
10. Hazardous Materials and Solid Waste
11. Public Outreach
12. Energy Efficiency and Recycling
13. Historical, Architectural, Archeological, and Cultural Resources
14. Environmental Justice
15. Cumulative Impacts
16. U.S. Department of Transportation Section 4(f)

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<sup>1</sup> The submission by the State Environmental Review Clearinghouse contained comments from various divisions of North Carolina Department of Environmental Quality (NCDEQ), however, they were all considered one submission since they were provided by the Clearinghouse.

From each major topic, unique individual comments were identified and numbered. All of the comments received and how they were grouped are included in this appendix. **Table J-1** identifies the assigned comment identification number, name of the commenter, the type of comments including if the comment was agency or public, and the index of the submission into the comment summary number.

**TABLE J-1, INDEX OF DRAFT EA COMMENTS**

COMMENTS ID	LAST NAME	FIRST NAME	AGENCY / PUBLIC	COMMENT NUMBER
AC001	Gledhill-Early	Renee	(Agency) State Historic Preservation Office	13.1
AC002-1	Best	Crystal	(Agency) State Environmental Review Clearinghouse	1.7
AC002-2	Hardison	Lyn	(Agency) NC Department of Environmental Quality	2.4, 7.3, 7.4, 7.5, 9.8, 9.9, 9.10, 9.11, 9.12, 9.13, 9.14, 9.15, 9.16, 9.17, 9.18, 9.19, 9.20, 9.21, 9.22, 9.23, 9.24, 9.25, 9.26, 9.27, 9.28, 9.29, 9.30, 9.31, 9.32, 9.33, 9.34, 9.35, 9.36, 9.37, 9.38, 10.2, 10.3, 10.4, 10.5, 10.6, 10.7, 10.8, 10.9
AC002-3	Gledhill-Early	Renee	(Agency) State Historic Preservation Office	13.1
AC002-4	Hudyncia	Joseph	(Agency) NC Department of Agriculture	1.6
AC002-5	Wen	Jintao	(Agency) NC Division of Emergency Management	1.6
AC002-6	Mosley	Jessica	(Agency) NC Department of Transportation	1.6
AC003	Matthews	Kathy	(Agency) U.S. Fish and Wildlife Service	7.2
AC004	White	Douglas	(Agency) U.S. EPA	1.8, 7.6, 8.3, 9.9, 10.10, 11.1, 14.2
WC001	Greenspan	Michael	(Public) Workshop Comment	1.1
WC002	Robinson	Dan	(Public) Workshop Comment	1.1
WC003	Erhart	Joseph	(Public) Workshop Comment	1.1
WC004	Whitney	A. Battle	(Public) Workshop Comment	1.1
WC005	Graber	Jessica	(Public) Workshop Comment	1.1
WC006	Fox	Bryan	(Public) Workshop Comment	1.1



RALEIGH-DURHAM INTERNATIONAL AIRPORT  
ENVIRONMENTAL ASSESSMENT FOR THE  
RUNWAY 5L/23R REPLACEMENT PROJECT

COMMENTS ID	LAST NAME	FIRST NAME	AGENCY / PUBLIC	COMMENT NUMBER
TC001	Liske	Lisa	(Public) Transcript Comment	1.9, 4.1, 7.1, 7.7, 8.1, 9.1
TC002	Kramer	Jonathan	(Public) Transcript Comment	1.10, 15.1
TC003	Irby	Jay	(Public) Transcript Comment	1.1, 3.3
TC004	Milazzo	Joe	(Public) Transcript Comment	1.1, 3.4
TC005	Rigg	Jacob	(Public) Transcript Comment	1.1
TC006	Chambers	Matt	(Public) Transcript Comment	1.1
TC007	McGeary	John	(Public) Transcript Comment	1.1
TC008	Hancock	Richard	(Public) Transcript Comment	1.1, 3.3
TC009	Harris	Josh	(Public) Transcript Comment	1.1, 3.4
TC010	Beals	Betsy	(Public) Transcript Comment	1.4, 1.11, 1.12, 1.13, 3.1, 3.2, 3.5, 3.6, 3.7, 6.2, 8.2, 9.39, 9.40, 9.41, 10.1, 10.11, 10.12
TC011	Robinson	Dan	(Public) Transcript Comment	1.1
TC012	Spooner	Jean	(Public) Transcript Comment	1.1, 6.1, 9.1, 9.2, 9.3, 9.43, 15.1
TC013	Lew	Natalie	(Public) Transcript Comment	5.1, 9.4, 9.5, 9.42, 14.1
EC001	Hunter	James	(Public) Email Comment	1.2
EC002	Montone	Lisa	(Public) Email Comment	1.3, 1.14, 1.15, 5.4
EC003	Clark	Lynn	(Public) Email Comment	1.3, 1.4, 1.14, 1.16, 5.4
EC004	Bennett	Erik	(Public) Email Comment	1.3
EC005	Hunter	James	(Public) Email Comment	1.2
EC006	Hannen	Stanley	(Public) Email Comment	1.3, 2.5, 3.1
EC007	Lu	Minh	(Public) Email Comment	1.3, 1.14, 1.15, 5.4
EC008	Norwood	Peter	(Public) Email Comment	1.3, 4.3, 5.4
EC009	Isserman	Megan	(Public) Email Comment	6.3
EC010	Collins	Mary	(Public) Email Comment	5.2, 7.8, 9.1
EC011	Olson	Pamela	(Public) Email Comment	5.2, 5.5, 9.1

RALEIGH-DURHAM INTERNATIONAL AIRPORT  
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COMMENTS ID	LAST NAME	FIRST NAME	AGENCY / PUBLIC	COMMENT NUMBER
EC012	Spooner	Jean	(Public) Email Comment	5.2, 6.1, 9.1
EC013	Lama	Mary	(Public) Email Comment	5.2, 9.1
EC014	Michener	Karen	(Public) Email Comment	5.2, 9.1, 9.44
EC015	Cline	Jacob	(Public) Email Comment	5.2, 9.1
EC016	Jones	Riley	(Public) Email Comment	1.30, 6.5, 9.1
EC017	Thomas	John	(Public) Email Comment	9.1
EC018	Schlosser	Paul	(Public) Email Comment	5.2, 9.1
EC019	Stellpflug	Michael	(Public) Email Comment	8.1, 9.1
EC020	Marne and Moore	Marielle and Steven	(Public) Email Comment	5.2, 5.3, 9.1
EC021	Cooper	Gabriella	(Public) Email Comment	5.2, 5.5, 9.1
EC022	Brie	Gabriella	(Public) Email Comment	5.2, 5.5, 9.1
EC023	Grace	Ryan	(Public) Email Comment	5.3
EC024	Pitser	Ken	(Public) Email Comment	1.17, 9.45
EC025	Millsaps	Peter	(Public) Email Comment	5.3
EC026	Corum	Deann	(Public) Email Comment	5.2, 9.1
EC027	Norris	Liam	(Public) Email Comment	1.4, 5.3
EC028	Darney	Sally	(Public) Email Comment	5.3, 9.1
EC029	Garcia	Lloyd	(Public) Email Comment	5.2, 9.1
EC030	Wells	Jacob	(Public) Email Comment	5.2, 5.3, 9.1
EC031	Slight	Elizabeth	(Public) Email Comment	5.2, 5.3, 9.1
EC032	Scott-Cole	Louise	(Public) Email Comment	5.6, 9.1
EC033	Collier	David	(Public) Email Comment	1.30, 5.2, 9.1
EC034	Deaton	Dina	(Public) Email Comment	1.30, 5.2, 9.1
EC035	Dell	Jade	(Public) Email Comment	5.3
EC036	Griffin	Melissa	(Public) Email Comment	5.2, 5.7, 9.1

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COMMENTS ID	LAST NAME	FIRST NAME	AGENCY / PUBLIC	COMMENT NUMBER
EC037	Evenson	K	(Public) Email Comment	5.2, 9.1
EC038	Allingham	Michael	(Public) Email Comment	5.2, 5.8, 9.1
EC039	Safriet	Genie	(Public) Email Comment	5.2, 9.1
EC040	Safriet	Genie	(Public) Email Comment	5.2, 9.1
EC041	York	Jon	(Public) Email Comment	5.9, 9.1
EC042	Johnstone	John	(Public) Email Comment	5.2, 9.1
EC043	Ferdon	Jane	(Public) Email Comment	5.3
EC044	Adley-Warrick	Lyle	(Public) Email Comment	9.1
EC045	Borisow	Nick	(Public) Email Comment	1.4, 2.1, 3.8
EC046	Feutz	Lisa	(Public) Email Comment	5.2, 5.3, 9.1
EC047	Lew	Natalie	(Public) Email Comment	1.30, 1.18, 2.2, 2.6, 2.7, 5.2, 5.5, 5.6, 5.10, 5.11, 9.1, 9.6, 9.46, 9.47
EC048	Lew	Natalie	(Public) Email Comment	1.30, 1.18, 2.2, 2.6, 2.7, 5.2, 5.5, 5.6, 5.10, 5.11, 9.1, 9.6, 9.46, 9.47
EC049	Missimer	Pam	(Public) Email Comment	1.30, 2.8, 5.2, 9.1, 9.6, 9.48
EC050	Ward	Henry	(Public) Email Comment	5.2, 9.1
EC051	Surh	Gerald	(Public) Email Comment	5.2, 9.1
EC052	Carl	Susan	(Public) Email Comment	9.1
EC053	Spooner	Jean	(Public) Email Comment	1.30, 1.19, 5.12, 5.13, 5.14, 5.15, 5.16, 5.17, 5.18, 5.19, 5.20, 6.1, 6.6, 6.7, 6.8, 9.1, 9.49, 9.50, 9.51, 10.13, 13.2, 13.3, 13.4, 15.1, 15.2, 16.1, 16.2, 16.3
EC054	Franklin	Anne	(Public) Email Comment	7.9, 9.1
EC055	White	Ellen	(Public) Email Comment	5.2, 9.1
EC056	Johnson	Gil	(Public) Email Comment	7.10, 9.1, 9.46

RALEIGH-DURHAM INTERNATIONAL AIRPORT  
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 RUNWAY 5L/23R REPLACEMENT PROJECT

COMMENTS ID	LAST NAME	FIRST NAME	AGENCY / PUBLIC	COMMENT NUMBER
EC057	Doucette	William	(Public) Email Comment	1.5, 1.20, 2.3, 2.9, 2.10, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 6.1, 6.4, 6.9, 7.11, 9.1, 9.7, 9.52, 15.3, 16.4
EC058	Good	Deb	(Public) Email Comment	5.2, 9.1
EC059	Osterbrink	Maple	(Public) Email Comment	1.3, 2.11, 2.12, 8.4, 9.1
EC060	McGuinn	Laura	(Public) Email Comment	5.2, 5.21, 9.1
EC061	Lechner	Judith	(Public) Email Comment	9.1
EC062	Briere	Leo	(Public) Email Comment	9.1, 1.21
EC063	Carson	Matthew	(Public) Email Comment	5.2, 9.1
EC064	Wooten	Rachael	(Public) Email Comment	5.2, 9.1
EC065	Quinn	Brittany	(Public) Email Comment	5.2, 9.1
EC066	Huberman	Joseph	(Public) Email Comment	9.1
EC067	Lew	Natalie	(Public) Email Comment	1.18, 1.22, 1.23, 1.24, 1.25, 1.26, 1.27, 1.28, 1.29, 2.13, 2.14, 2.15, 2.16, 5.22, 9.53, 9.54, 9.55
EC068	Masavage	Patrick	(Public) Email Comment	1.3, 1.14, 1.15, 5.4

**From:** [DCR - Environmental Review](#)  
**To:** [RDUEA](#)  
**Cc:** [jackie.sweatt-essick@faa.gov](mailto:jackie.sweatt-essick@faa.gov); [Best, Crystal](#)  
**Subject:** Draft Environmental Assessment for Reconstruction of Runway 5L/23R, Raleigh-Durham International Airport, Raleigh, Wake County, 23-E-0000-0141, ER 20-2333  
**Date:** Friday, February 24, 2023 1:49:54 PM  
**Attachments:** [ER-20-2333.pdf](#)

**CAUTION:** This email attachment originated from a third party. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Our response is attached. Thank you.

Best,

**Devon L. Borgardt**

Environmental Review Assistant  
State Historic Preservation Office

109 E. Jones Street MSC 4603 Raleigh, NC 27699



NC DEPARTMENT OF  
NATURAL AND CULTURAL RESOURCES

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

**Please Note:** Requests for project review or responses to our review comments should be sent to the Environmental Review mailbox at [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). Otherwise, your request will be returned and you will be asked to send it to the proper mailbox. This will cause delays in your project. Information on email project submittal is at: [NCHPO ER Project Review Checklist](#)

[Facebook](#) [Twitter](#) [Instagram](#) [YouTube](#)



**North Carolina Department of Natural and Cultural Resources  
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary, Darin J. Waters, Ph.D.

February 24, 2023

Chris Babb  
Landrum & Brown  
4445 Lake Forest Drive, Suite 700  
Cincinnati, OH 45242

[RDUEA@landrumbrown.com](mailto:RDUEA@landrumbrown.com)

Re: Draft Environmental Assessment for Reconstruction of Runway 5L/23R, Raleigh-Durham International Airport, Raleigh, Wake County, 23-E-0000-0141, ER 20-2333

Dear Mr. Babb:

Thank you for your January 24, 2023, email providing notification that the Draft Environmental Assessment (DEA) for the above-referenced undertaking is available for review and comment.

Having reviewed the DEA that incorporates our comments concerning historic properties, we find that as proposed the undertaking will not affect any properties listed in or eligible for listing in the National Register of Historic Places. ] 13.1

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

*Renee Gledhill-Earley*

for Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Jackie Sweatt-Essick, FAA/Memphis  
Crystal Best, State Clearinghouse

[Jackie.Sweatt-Essick@faa.gov](mailto:Jackie.Sweatt-Essick@faa.gov)  
[crystal.best@doa.nc.gov](mailto:crystal.best@doa.nc.gov)

**From:** [crystal.best@doa.nc.gov](mailto:crystal.best@doa.nc.gov)  
**To:** [RDUFA](#)  
**Subject:** RE:23-E-0000-0141 - Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and,  
**Date:** Tuesday, February 28, 2023 7:43:04 AM  
**Attachments:** [000043\\_23-0141\\_DEQ\\_Comments.pdf](#)  
[000121\\_SHPO\\_comment.pdf](#)  
[23E00000141\\_000043\\_TrackingSheet.pdf](#)  
[23E00000141\\_000047\\_TrackingSheet.pdf](#)  
[23E00000141\\_000054\\_TrackingSheet.pdf](#)  
[23E00000141\\_000121\\_TrackingSheet.pdf](#)  
[23E00000141\\_000130\\_TrackingSheet.pdf](#)  
[23E00000141\\_Letter.pdf](#)

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Please see the attached comments.



**Roy Cooper**  
Governor

**Pamela B. Cashwell**  
Secretary

February 28, 2023

Chris Babb  
Raleigh-Durham Airport Authority  
c/o Landrum & Brown  
4445 Lake Forest Drive, Suite 700  
Cincinnati, OH 45242-

**Re: SCH File # 23-E-0000-0141 Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Bri**

Dear Chris Babb:

The above referenced environmental impact information has been submitted to the State Clearinghouse under the provisions of the National Environmental Policy Act. According to G.S. 113A-10, when a state agency is required to prepare an environmental document under the provisions of federal law, the environmental document meets the provisions of the State Environmental Policy Act.

] 1.7

Attached to this letter are comments made by the agencies in the review of this document. If any further environmental review documents are prepared for this project, they should be forwarded to this office for intergovernmental review.

If you have any questions, please do not hesitate to contact me at (984) 236-0000.

Sincerely,

CRYSTAL BEST  
State Environmental Review Clearinghouse

Attachments

**Mailing**  
1301 Mail Service Center | Raleigh, NC 27699-1301



[ncadmin.nc.gov](http://ncadmin.nc.gov)

**Location**  
116 West Jones St. | Raleigh NC 27603  
984-236-0000 T



Control No.: 23-E-0000-0141  
County.: WAKE, DURHAM

Date Received: 1/27/2023  
Agency Response: 2/27/2023  
Review Closed: 2/27/2023

LYN HARDISON  
CLEARINGHOUSE COORDINATOR  
DEPT OF ENVIRONMENTAL QUALITY

Project Information

Type: National Environmental Policy Act Environmental Assessment  
Applicant: Raleigh-Durham Airport Authority  
Project Desc.: Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Brier Creek Reservoir, construction of drainage improvements, relocation of a portion of Lumley Road, utility relocations, demolition of four airport-owned buildings, relocation of aircraft navigational aids, acquisition of property, and removal and/or mitigation of obstacles in accordance with Federal Aviation Administration safety standards.

As a result of this review the following is submitted:

No Comment       Comments Below       Documents Attached

Reviewed By: LYN HARDISON

Date: 2/27/2023



NORTH CAROLINA  
*Environmental Quality*

ROY COOPER  
*Governor*

ELIZABETH S. BISER  
*Secretary*

To: Crystal Best  
State Clearinghouse  
NC Department of Administration

From: Lyn Biles  
Division of Environmental Assistance and Customer Service  
Washington Regional Office

Re: 23-0141  
Environmental Assessment - Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway.  
Wake and Durham Counties

Date: February 27, 2023

The Department of Environment Quality has reviewed the proposal for the referenced project. Based on the information provided, several of our agencies have identified permits that may be required and offered some valuable guidance. The comments are attached for the applicant's review.

The Department will continue to be available to assist the applicant with any questions or concerns.

Thank you for the opportunity to respond.

Attachments



North Carolina Department of Environmental Quality  
217 West Jones Street | 1601 Mail Service Center | Raleigh, North Carolina 27699-1601  
919.707.8600



## ☒ North Carolina Wildlife Resources Commission ☒

Cameron Ingram, Executive Director

### MEMORANDUM

**TO:** Lyn Hardison, Environmental Assistance Coordinator  
Division of Environmental Assistance and Outreach, DENR

**FROM:** Travis Wilson, Highway Project Coordinator  
Habitat Conservation Program

**DATE:** February 23, 2023

**SUBJECT:** Federal Aviation Administration (FAA), Environmental Assessment for the proposed improvements to Raleigh Durham International Airport, Wake and Durham Counties, North Carolina. SCH Project No. 23-0141

Staff biologists with the N. C. Wildlife Resources Commission have reviewed the subject EA and are familiar with habitat values in the project area. The purpose of this review was to assess project impacts to fish and wildlife resources. Our comments are provided in accordance with certain provisions of the National Environmental Policy Act (42 U.S.C. 4332(2)(c)) and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661-667d).

Raleigh-Durham Airport Authority is proposing to make improvements to the Raleigh Durham International Airport. The EA identifies impacts associated with these proposed improvements; specific comments on these actions are outlined below.

- FAA committed to the protection of a 660 foot buffer around the active bald eagle nest from December 1 to July 15. However additional minimization measures such as scheduling blasting and work closest to the nest to be conducted outside of the December to July timeframe would further reduce potential impacts to nesting bald eagles. ] 7.3
- Land clearing activities for this project are significant. The forested buffer around the borrow sites should be maximized to the greatest extent practicable and should be highlighted on the construction plans to prevent over clearing. Furthermore, developing a reforestation plan for the borrow sites would help mitigate for lost habitat. ] 7.4

**Mailing Address:** Habitat Conservation • 1721 Mail Service Center • Raleigh, NC 27699-1721  
**Telephone:** (919) 707-0220 • **Fax:** (919) 707-0028

As planning and design for the project continues further avoid and minimize to natural resources in the project area should be incorporated. Such as reduction in wetland and stream impacts, minimizing tree clearing limits and maximizing vegetated buffer widths. Thank you for the opportunity to comment. If we can be of any further assistance please contact me at (919) 707-4057.

} 7.5

**ROY COOPER**  
*Governor*  
**DIONNE DELLI-GATTI**  
*Secretary*  
**S. DANIEL SMITH**  
*Director*



**NORTH CAROLINA**  
*Environmental Quality*

February 9, 2023

**MEMORANDUM**

To: Lyn Biles, SEPA Coordinator, NC DEQ

From: Rob Ridings, Division of Water Resources, Transportation 401 Permitting Branch

Subject: Comments on the Environmental Assessment related the proposed Runway Relocation of Raleigh-Durham International Airport and Lumley Road relocation in Wake County.  
 State Clearinghouse Project No. 23-0141

This office has reviewed the referenced document received January 27, 2023. The NC Division of Water Resources (NCDWR) Transportation Permitting Branch is responsible for the issuance of the Section 401 Water Quality Certification for activities that impact Waters of the U.S., including wetlands. It is our understanding that the project as presented will result in impacts to jurisdictional wetlands, streams, buffers and/or other surface waters.

Streams and tributaries in the project vicinity include:

Stream Name	River Basin	Stream Classifications	Stream Index Number	303(d) Listing?
Brier Creek	Neuse	C; NSW	27-33-4	Yes
Little Brier Creek	Neuse	C; NSW	27-33-4-1	Yes
Lake Crabtree	Neuse	B; NSW	27-33-(3.5)	Yes
Haleys Branch	Neuse	C; NSW	27-33-7	No
Sycamore Creek & Big Lake	Neuse	B; NSW	27-33-9	No
Stirrup Iron Creek	Neuse	C; NSW	27-33-4-2	No

The NCDWR offers the following comments based on review of the aforementioned document:

**Project Specific Comments:**

1. Design plans shall provide treatment of the stormwater runoff through BMPs as detailed in the most recent version of the North Carolina Department of Transportation Stormwater Post-Construction Stormwater Program Manual, and the Best Management Practices Toolbox Manual. The BMPs should, to the MEP, be selected and designed to reduce impacts of the target pollutants of concern (POCs) for the receiving waters.

} 9.8

2. All area surface waters are class NSW waters of the State. The NCDWR is very concerned with sediment and erosion impacts that could result from this project. The NCDWR recommends that highly protective

} 9.10



North Carolina Department of Environmental Quality | Division of Water Resources  
 512 North Salisbury Street | 1617 Mall Service Center | Raleigh, North Carolina 27699-1617  
 919.707.9000

sediment and erosion control BMPs be implemented to reduce the risk of nutrient runoff to these surface waters. Post-construction stormwater BMPs should, to the MEP, be selected and designed to reduce nutrients.

] 9.10

3. Brier Creek, Little Brier Creek, Lake Crabtree, and all their tributaries are class 303(d) impaired waters of the State. The NCDWR is very concerned with sediment and erosion impacts that could result from this project. The NCDWR recommends that the most protective sediment and erosion control BMPs be implemented in accordance with *Design Standards in Sensitive Watersheds* (15A NCAC 04B .0124) or comparable BMPs to reduce the risk of further impairment to these surface waters. Post-construction stormwater BMPs should be selected and designed to the MEP, to reduce target POCs in the 303(d) list for the receiving waters.

] 9.11

4. This project is within the Neuse River Basin. Riparian buffer impacts shall be avoided and minimized to the greatest extent possible pursuant to 15A NCAC 2B.0714. New development activities located in the protected 50-foot wide riparian areas within the basin shall be limited to "uses" identified within and constructed in accordance with 15A NCAC 2B.0295. Buffer mitigation may be required for buffer impacts resulting from activities classified as "allowable with mitigation" within the "Table of Uses" section of the Buffer Rules or require a variance under the Buffer Rules. A buffer mitigation plan, including use of the North Carolina Division of Mitigation Services, must be provided to the NCDWR prior to approval of the Water Quality Certification. Buffer mitigation may be required for buffer impacts resulting from activities classified as "allowable with mitigation" within the "Table of Uses" section of the Buffer Rules or require a variance under the Buffer Rules. A buffer mitigation plan, coordinated with the North Carolina Division of Mitigation Services, must be provided to the NCDWR prior to approval of the Water Quality Certification.

] 9.12

**General Transportation Project Comments:**

The environmental document and/or permit applications should provide a detailed and itemized presentation of the proposed impacts to wetlands and streams with corresponding mapping. If mitigation is necessary as required by 15A NCAC 2H.0506(h), it is preferable to present a conceptual (if not finalized) mitigation plan with the environmental documentation. Appropriate mitigation plans will be required prior to issuance of a 401 Water Quality Certification.

] 9.13

Environmental impact statement alternatives shall consider design criteria that reduce the impacts to streams and wetlands from storm water runoff. These alternatives should include designs that allow for treatment of the storm water runoff through best management practices as detailed in the most recent version of the North Carolina Department of Transportation Stormwater Best Management Practices Toolbox manual, which includes BMPs such as grassed swales, buffer areas, preformed scour holes, retention basins, etc.

] 9.14

After the selection of the preferred alternative and prior to an issuance of the 401 Water Quality Certification, the applicant is respectfully reminded that they will need to demonstrate the avoidance and minimization of impacts to wetlands (and streams) to the maximum extent practical. In accordance with the Environmental Management Commission's Rules (15A NCAC 2H.0506[h]), mitigation will be required for impacts of greater than 1 acre to wetlands. In the event that mitigation is required, the mitigation plan shall be designed to replace appropriate lost functions and values. The North Carolina Division of Mitigation Services may be available to assist with wetland mitigation.

] 9.15

In accordance with the Environmental Management Commission's Rules (15A NCAC 2H.0506[h]), mitigation will be required for impacts of greater than 150 linear feet to any single stream. In the event that mitigation is required, the mitigation plan shall be designed to replace appropriate lost functions and values. The North Carolina Division of Mitigation Services may be available to assist with stream mitigation.

] 9.16

Future documentation, including the 401 Water Quality Certification Application, shall continue to include an itemized listing of the proposed wetland and stream impacts with corresponding mapping.

] 9.17



The NCDWR is very concerned with sediment and erosion impacts that could result from this project. The applicant shall address these concerns by describing the potential impacts that may occur to the aquatic environments and any mitigating factors that would reduce the impacts.

9.18

An analysis of cumulative and secondary impacts anticipated as a result of this project is required. The type and detail of analysis shall conform to the NC Division of Water Resources Policy on the assessment of secondary and cumulative impacts dated April 10, 2004.

9.19

The applicant is respectfully reminded that all impacts, including but not limited to, bridging, fill, excavation and clearing, and rip rap to jurisdictional wetlands, streams, and riparian buffers need to be included in the final impact calculations. These impacts, in addition to any construction impacts, temporary or otherwise, also need to be included as part of the 401 Water Quality Certification Application.

9.20

Where streams must be crossed, the NCDWR prefers bridges be used in lieu of culverts. However, we realize that economic considerations often require the use of culverts. Please be advised that culverts should be countersunk to allow unimpeded passage by fish and other aquatic organisms. Moreover, in areas where high quality wetlands or streams are impacted, a bridge may prove preferable. When applicable, the applicant should not install the bridge bents in the creek, to the maximum extent practicable. (If you want specific bridging locations, put in here.)

9.21

Whenever possible, the NCDWR prefers spanning structures. Spanning structures usually do not require work within the stream or grubbing of the streambanks and do not require stream channel realignment. The horizontal and vertical clearances provided by bridges shall allow for human and wildlife passage beneath the structure. Fish passage and navigation by canoeists and boaters shall not be blocked. Bridge supports (bents) should not be placed in the stream when possible.

9.22

Bridge deck drains shall not discharge directly into the stream. Stormwater shall be directed across the bridge and pre-treated through site-appropriate means (grassed swales, pre-formed scour holes, vegetated buffers, etc.) before entering the stream. Please refer to the most recent version of the North Carolina Department of Transportation Stormwater Best Management Practices Toolbox manual for approved measures.

9.23

Sediment and erosion control measures should not be placed in wetlands or streams.

9.24

Borrow/waste areas should avoid wetlands to the maximum extent practical. Impacts to wetlands in borrow/waste areas will need to be presented in the 401 Water Quality Certification and could precipitate compensatory mitigation.

9.25

The 401 Water Quality Certification application will need to specifically address the proposed methods for stormwater management. More specifically, stormwater shall not be permitted to discharge directly into streams or surface waters.

9.26

Based on the information presented in the document, the magnitude of impacts to wetlands and streams may require an Individual Permit application to the Corps of Engineers and corresponding 401 Water Quality Certification. Please be advised that a 401 Water Quality Certification requires satisfactory protection of water quality to ensure that water quality standards are met and no wetland or stream uses are lost. Final permit authorization will require the submittal of a formal application by the permittee and written concurrence from the NCDWR. Please be aware that any approval will be contingent on appropriate avoidance and minimization of wetland and stream impacts to the maximum extent practical, the development of an acceptable stormwater management plan, and the inclusion of appropriate mitigation plans where appropriate.

9.27

If concrete is used during construction, a dry work area shall be maintained to prevent direct contact between curing concrete and stream water. Water that inadvertently contacts uncured concrete shall not be discharged to surface waters due to the potential for elevated pH and possible aquatic life and fish kills. Concrete shall be handled in accordance with the NPDES Construction General Permit NCG010000.

9.28

If temporary access roads or detours are constructed, the site shall be graded to its preconstruction contours and elevations. Disturbed areas shall be seeded or mulched to stabilize the soil and appropriate native woody species shall be planted. When using temporary structures the area shall be cleared but not grubbed. Clearing the area with

9.29





chain saws, mowers, bush-hogs, or other mechanized equipment and leaving the stumps and root mat intact allows the area to re-vegetate naturally and minimizes soil disturbance.

9.29

Unless otherwise authorized, placement of culverts and other structures in waters and streams shall be placed below the elevation of the streambed by one foot for all culverts with a diameter greater than 48 inches, and 20 percent of the culvert diameter for culverts having a diameter less than 48 inches, to allow low flow passage of water and aquatic life. Design and placement of culverts and other structures including temporary erosion control measures shall not be conducted in a manner that may result in dis-equilibrium of wetlands or streambeds or banks, adjacent to or upstream and downstream of the above structures. The applicant is required to provide evidence that the equilibrium is being maintained if requested in writing by the NCDWR. If this condition is unable to be met due to bedrock or other limiting features encountered during construction, please contact the NCDWR for guidance on how to proceed and to determine whether or not a permit modification will be required.

9.30

If multiple pipes or barrels are required, they shall be designed to mimic natural stream cross section as closely as possible including pipes or barrels at flood plain elevation, floodplain benches, and/or sills may be required where appropriate. Widening the stream channel should be avoided. Stream channel widening at the inlet or outlet end of structures typically decreases water velocity causing sediment deposition that requires increased maintenance and disrupts aquatic life passage.

9.31

If foundation test borings are necessary; it shall be noted in the document. Geotechnical work is approved under General 401 Certification Number 3883/Nationwide Permit No. 6 for Survey Activities.

9.32

Sediment and erosion control measures sufficient to protect water resources must be implemented and maintained in accordance with the most recent version of North Carolina Sediment and Erosion Control Planning and Design Manual and the most recent version of NCS000250.

9.33

All work in or adjacent to stream waters shall be conducted in a dry work area. Approved BMP measures from the most current version of the NCDOT Construction and Maintenance Activities manual such as sandbags, rock berms, cofferdams and other diversion structures shall be used to prevent excavation in flowing water.

9.34

While the use of National Wetland Inventory (NWI) maps, NC Coastal Region Evaluation of Wetland Significance (NC-CREWS) maps and soil survey maps are useful tools, their inherent inaccuracies require that qualified personnel perform onsite wetland delineations prior to permit approval.

9.35

Heavy equipment should be operated from the bank rather than in stream channels in order to minimize sedimentation and reduce the likelihood of introducing other pollutants into streams. This equipment shall be inspected daily and maintained to prevent contamination of surface waters from leaking fuels, lubricants, hydraulic fluids, or other toxic materials.

9.36

Riprap shall not be placed in the active thalweg channel or placed in the streambed in a manner that precludes aquatic life passage. Bioengineering boulders or structures should be properly designed, sized and installed.

9.37

Riparian vegetation (native trees and shrubs) shall be preserved to the maximum extent possible. Riparian vegetation must be reestablished within the construction limits of the project by the end of the growing season following completion of construction.

9.38

The NCDWR appreciates the opportunity to provide comments on your project. Should you have any questions or require any additional information, please contact Rob Ridings at [rob.ridings@ncdenr.gov](mailto:rob.ridings@ncdenr.gov) or 919-707-8786.





ROY COOPER  
Governor  
ELIZABETH S. BISER  
Secretary  
MICHAEL SCOTT  
Director



**MEMORANDUM**

TO: Michael Scott, Division Director through Sharon Brinkley

FROM: Amanda Thompson, Environmental Senior Specialist – Solid Waste Section

DATE: February 2, 2023

SUBJECT: Review: SW 23-0141 – Wake County (Environmental Assessment – Raleigh-Durham Airport Authority – Proposed project is for the relocation of Runway 5L/23R approximately 537 feet NW of existing Runway 5L/23R and after construction is complete, converting the existing Runway 5L/23R into a taxiway.)

The Division of Waste Management, Solid Waste Section (Section) has reviewed the documents submitted for the subject project in Wake County, NC. Because of recent developments surrounding the potential of PFAS contamination at airports and other facilities where the use of fire suppression foam may have occurred, areas where there were airport responses to fires or spills should be evaluated separately from areas with no suspected contaminants. Any materials generated by the excavation of soil, demolition of concrete, asphalt, and other potentially contaminated media must be managed and disposed of appropriately and in accordance with current North Carolina regulations. Based on the information provided in this document, the Section at this time does not see an adverse impact on the surrounding communities and likewise knows of no situations in the communities, which would affect this project.

} 10.2  
} 10.3  
} 10.4

For any planned or proposed projects, it is recommended that during any land clearing, demolition, and construction, the Raleigh-Durham Airport Authority and/or its contractors would make every feasible effort to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials in the development of this project where suitable. **Any waste generated by and of the project that cannot be beneficially reused or recycled as described, may require disposal of at a solid waste management facility permitted by the Division. The Section strongly recommends that the Raleigh-Durham Airport Authority require all contractors to provide proof of proper disposal for all generated waste to permitted facilities.**

} 10.5  
} 10.6

Permitted solid waste management facilities are listed on the Division of Waste Management, Solid Waste Section portal site at: <https://deq.nc.gov/about/divisions/waste-management/waste-management-rules-data/solid-waste-management-annual-reports/solid-waste-permitted-facility-list>

And the site locator tool at:

<https://ncdenr.maps.arcgis.com/apps/webappviewer/index.html?id=7dd59be2750b40bebebfa49fc383f688>



Raleigh-Durham Airport Authority  
NEPA Scoping  
Page 2 of 2  
February 2, 2023

Questions regarding solid waste management for this project should be directed to Mr. Tim Davis, Environmental Senior Specialist, Solid Waste Section, at (919) 707-8290.

cc: Tim Davis, Environmental Senior Specialist



North Carolina Department of Environmental Quality | Division of Waste Management  
Fayetteville Regional Office | 225 Green Street, Suite 714 | Fayetteville, North Carolina 28301  
910.433.3300

ROY COOPER  
Governor  
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Secretary  
MICHAEL SCOTT  
Director



NORTH CAROLINA  
Environmental Quality

February 22, 2023

To: Lyn Hardison, Environmental Assistance and SEPA Coordinator  
Division of Environmental Assistance and Customer Service

From: Melodi Deaver, Administrative Specialist  
Division of Waste Management, Hazardous Waste Section

RE: NEPA Review, Project# 23-0141, Raleigh-Durham Airport Authority (Wake)

The Hazardous Waste Section has reviewed the proposed project for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Brier Creek Reservoir, construction of drainage improvements, relocation of a portion of Lumley Road, utility relocations, demolition of four airport-owned buildings, relocation of aircraft navigational aids, acquisition of property, and removal and/or mitigation of obstacles in accordance with Federal aviation Administration safety standards and would like to make the following comment:

Any hazardous waste generated from the demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed project must be managed in accordance with the North Carolina Hazardous Waste Rules. The demolition, construction, operation, maintenance, and remediation activities conducted will most likely generate a solid waste, and a determination must be made whether it is a hazardous waste. If a project site generates more than 220 pounds of hazardous waste in a calendar month, the HWS must be notified, and the site must comply with the small quantity generator (SQG) requirements. If a project site generates more than 2200 pounds of hazardous waste in a calendar month, the HWS must be notified, and the facility must comply with the large quantity generator (LQG) requirements.

} 10.7

Generators are required to determine their generator status and both SQGs & LQGs are required to obtain a site EPA Identification number for the generation of hazardous waste.

} 10.8

Should any questions arise, please contact Melodi Deaver at 919-707-8204 or Heather Goldman at 919-270-2186.

Respectfully,

*Melodi Deaver*

Compliance Branch  
Hazardous Waste Section



**ROY COOPER**  
Governor

**ELIZABETH S. BISER**  
Secretary

**MICHAEL SCOTT**  
Director



**NORTH CAROLINA**  
*Environmental Quality*

Date: January 30, 2023

To: Michael Scott, Director  
Division of Waste Management

Through: Janet Macdonald  
Inactive Hazardous Sites Branch

From: Katie C Tatum  
Inactive Hazardous Sites Branch

Subject: NEPA Project # 23-0141 Raleigh-Durham Airport Authority, Wake (Durham) County, North Carolina

The Superfund Section has reviewed the proximity of sites under its jurisdiction to the Raleigh-Durham Airport Authority project. Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Brier Creek Reservoir, construction of drainage improvements, relocation of a portion of Lumley Road, utility relocations, demolition of four airport-owned buildings, relocation of aircraft navigational aids, acquisition of property, and removal and/or mitigation of obstacles in accordance with Federal Aviation Administration safety standards. <https://www.airportprojects.net/rdu-ea/reports-documents/>

Two (2) Superfund Section sites and one (1) Brownfields Program Sites were identified within one mile of the project as shown on the attached report. The Superfund Section recommends that site files be reviewed to ensure that appropriate precautions are incorporated into any construction activities that encounter potentially contaminated soil or groundwater. Superfund Section files can be viewed at: <http://deq.nc.gov/waste-management-laserfiche>.

10.9

Please contact Janet Macdonald at 919.707.8349 if you have any questions concerning the Superfund Section review portion of this SEPA/NEPA inquiry.



North Carolina Department of Environmental Quality | Division of Waste Management  
217 West Jones Street | 1646 Mail Service Center | Raleigh, North Carolina 27699-1646  
919.707.8200



# Superfund & Brownfield Sites SEPA/NEPA Review Report

## Area of Interest (AOI) Information

Area : 8,658.87 acres

Jan 30 2023 8:51:35 Eastern Standard Time

Wake (Durham) County NEPA project 23-0141



1:72,224

0 0.5 1 2 4 km

0 0.5 1 2 miles

City of Raleigh, Town of Cary, County of Durham, State of North Carolina  
 Environmental Response Project # 23055, AE75  
 FEMA, NCEM, EPA, USACE

Superfund and Brownfield Sites  
Wake (Durham) County NEPA project 23-0141

**Summary**

Name	Count	Area(acres)	Length(mi)
Certified DSCA Sites	0	N/A	N/A
Federal Remediation Branch Sites	1	N/A	N/A
Inactive Hazardous Sites	1	N/A	N/A
Pre-Regulatory Landfill Sites	0	N/A	N/A
Brownfields Program Sites	1	N/A	N/A

**Federal Remediation Branch Sites**

#	SITE_ID	SITE_NAME	Count
1	NCD003202603	WARD TRANSFORMER COMPANY	1

**Inactive Hazardous Sites**

#	EPAID	SITENAME	Count
1	NONCD0002219	NORTHERN TELECOM-CEM.TANK SOLV	1

**Brownfields Program Sites**

#	BF_ID	BF_Name	Count
1	2202018092	Ward Transformer Co (RN)	1



State of North Carolina Department of Environmental Quality  
 INTERGOVERNMENTAL REVIEW PROJECT COMMENTS

Reviewing Regional Office: Raleigh  
 Project Number: 23-0141 Due Date: 2/23/2023  
 County: Wake Durham

After review of this project, it has been determined that the DEQ permit(s) and/or approvals indicated may need to be obtained for this project to comply with North Carolina Law. Questions regarding these permits should be addressed to the Regional Office indicated on the reverse of the form. All applications, information and guidelines relative to these plans and permits are available from the same Regional Office.

2.4

	PERMITS	SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Process Time (Statutory time limit)
<input type="checkbox"/>	Permit to construct & operate wastewater treatment facilities, non-standard sewer system extensions & sewer systems that do not discharge into state surface waters.	Application 90 days before begins construction or award of construction contracts. On-site inspection may be required. Post-application technical conference usual.	30 days (90 days)
<input type="checkbox"/>	Permit to construct & operate, sewer extensions involving gravity sewers, pump stations and force mains discharging into a sewer collection system	Fast-Track Permitting program consists of the submittal of an application and an engineer's certification that the project meets all applicable State rules and Division Minimum Design Criteria.	30 days (N/A)
<input type="checkbox"/>	NPDES - permit to discharge into surface water and/or permit to operate and construct wastewater treatment facilities discharging into state surface waters.	Application 180 days before begins activity. On-site inspection. Pre-application conference usual. Additionally, obtain permit to construct wastewater treatment facility granted after NPDES. Reply time, 30 days after receipt of plans or issue of NPDES permit-whichever is later.	90-120 days (N/A)
<input type="checkbox"/>	Water Use Permit	Pre-application technical conference usually necessary.	30 days (N/A)
<input type="checkbox"/>	Well Construction Permit	Complete application must be received, and permit issued prior to the installation of a groundwater monitoring well located on property not owned by the applicant, and for a large capacity (>100,000 gallons per day) water supply well.	7 days (15 days)
<input type="checkbox"/>	Dredge and Fill Permit	Application copy must be served on each adjacent riparian property owner. On-site inspection. Pre-application conference usual. Filling may require Easement to Fill from N.C. Department of Administration and Federal Dredge and Fill Permit.	55 days (90 days)
<input type="checkbox"/>	Permit to construct & operate Air Pollution Abatement facilities and/or Emission Sources as per 15 A NCAC (2Q.0100 thru 2Q.0300)	Application must be submitted, and permit received prior to construction and operation of the source. If a permit is required in an area without local zoning, then there are additional requirements and timelines (2Q.0113).	90 days
<input checked="" type="checkbox"/>	Any open burning associated with subject proposal must be in compliance with 15 A NCAC 2D.1900	N/A	60 days (90 days)
<input checked="" type="checkbox"/>	Demolition or renovations of structures containing asbestos material must be in compliance with 15 A NCAC 20.1110 (a) (1) which requires notification and removal prior to demolition. Contact Asbestos Control Group 919-707-5950	Please Note - The Health Hazards Control Unit (HHCU) of the N.C. Department of Health and Human Services, must be notified of plans to demolish a building, including residences for commercial or industrial expansion, even if no asbestos is present in the building.	60 days (90 days)
<input checked="" type="checkbox"/>	The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion & sedimentation control plan will be required if one or more acres are to be disturbed. Plan must be filed with and approved by applicable Regional Office (Land Quality Section) at least 30 days before beginning activity. A NPDES Construction Stormwater permit (NCG010000) is also usually issued should design features meet minimum requirements. A fee of \$100 for the first acre or any part of an acre. An express review option is available with additional fees.		20 days (30 days)
<input type="checkbox"/>	Sedimentation and erosion control must be addressed in accordance with NCDOT's approved program. Particular attention should be given to design and installation of appropriate perimeter sediment trapping devices as well as stable Stormwater conveyances and outlets.		(30 days)
<input type="checkbox"/>	Sedimentation and erosion control must be addressed in accordance with _____ Local Government's approved program. Particular attention should be given to design and installation of appropriate perimeter sediment trapping devices as well as stable Stormwater conveyances and outlets.		Based on Local Program
<input type="checkbox"/>	Compliance with 15A NCAC 04B .0125 – Buffers Zones for Trout Waters shall have an undisturbed buffer zone 25 feet wide or of sufficient width to confine visible siltation within the twenty-five percent (25%) of the buffer zone nearest the land-disturbing activity, whichever is greater.		
<input checked="" type="checkbox"/>	Compliance with 15A NCAC 2H .0126 - NPDES Stormwater Program which regulates three types of activities: Industrial, Municipal Separate Storm Sewer System & Construction activities that disturb ≥1 acre.		30-60 days (90 days)
<input type="checkbox"/>	Compliance with 15A NCAC 2H 1000 -State Stormwater Permitting Programs regulate site development and post-construction stormwater runoff control. Areas subject to these permit programs include all 20 coastal counties, and various other counties and watersheds throughout the state.		45 days (90 days)

State of North Carolina Department of Environmental Quality  
INTERGOVERNMENTAL REVIEW PROJECT COMMENTS

Reviewing Regional Office: Raleigh  
Project Number: 23-0141 Due Date: 2/23/2023  
County: Wake Durham

	PERMITS	SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Process Time (Statutory time limit)
<input type="checkbox"/>	Mining Permit	On-site inspection usual. Surety bond filed with DEQ Bond amount varies with type mine and number of acres of affected land. Affected area greater than one acre must be permitted. The appropriate bond must be received before the permit can be issued.	30 days (60 days)
<input type="checkbox"/>	Dam Safety Permit	If permit required, application 60 days before begin construction. Applicant must hire N.C. qualified engineer to prepare plans, inspect construction, and certify construction is according to DEQ approved plans. May also require a permit under mosquito control program. And a 404 permit from Corps of Engineers. An inspection of site is necessary to verify Hazard Classification. A minimum fee of \$200.00 must accompany the application. An additional processing fee based on a percentage, or the total project cost will be required upon completion.	30 days (60 days)
<input type="checkbox"/>	Oil Refining Facilities	N/A	90-120 days (N/A)
<input type="checkbox"/>	Permit to drill exploratory oil or gas well	File surety bond of \$5,000 with DEQ running to State of NC conditional that any well opened by drill operator shall, upon abandonment, be plugged according to DEQ rules and regulations.	10 days (N/A)
<input type="checkbox"/>	Geophysical Exploration Permit	Application filed with DEQ at least 10 days prior to issue of permit. Application by letter. No standard application forms.	10 days (N/A)
<input type="checkbox"/>	State Lakes Construction Permit	Application fee based on structure size is charged. Must include descriptions & drawings of structure & proof of ownership of riparian property	15-20 days (N/A)
<input type="checkbox"/>	401 Water Quality Certification	Compliance with the T15A 02H .0500 Certifications are required whenever construction or operation of facilities will result in a discharge into navigable water as described in 33 CFR part 323.	60 days (130 days)
<input type="checkbox"/>	Compliance with Catawba, Goose Creek, Jordan Lake, Randleman, Tar Pamlico or Neuse Riparian Buffer Rules is required. Buffer requirements: <a href="http://deq.nc.gov/about/divisions/water-resources/water-resources-permits/wastewater-branch/401-wetlands-buffer-permits/401-riparian-buffer-protection-program">http://deq.nc.gov/about/divisions/water-resources/water-resources-permits/wastewater-branch/401-wetlands-buffer-permits/401-riparian-buffer-protection-program</a>		
<input type="checkbox"/>	Nutrient Offset: Loading requirements for nitrogen and phosphorus in the Neuse and Tar-Pamlico River basins, and in the Jordan and Falls Lake watersheds, as part of the nutrient-management strategies in these areas. DWR nutrient offset information: <a href="http://deq.nc.gov/about/divisions/water-resources/planning/nonpoint-source-management/nutrient-offset-information">http://deq.nc.gov/about/divisions/water-resources/planning/nonpoint-source-management/nutrient-offset-information</a>		
<input type="checkbox"/>	CAMA Permit for MAJOR development	\$250.00 - \$475.00 fee must accompany application	75 days (150 days)
<input type="checkbox"/>	CAMA Permit for MINOR development	\$100.00 fee must accompany application	22 days (25 days)
<input type="checkbox"/>	Abandonment of any wells, if required must be in accordance with Title 15A. Subchapter 2C.0100.		
<input checked="" type="checkbox"/>	Notification of the proper regional office is requested if "orphan" underground storage tanks (USTS) are discovered during any excavation operation.		
<input type="checkbox"/>	Plans and specifications for the construction, expansion, or alteration of a public water system must be approved by the Division of Water Resources/Public Water Supply Section prior to the award of a contract or the initiation of construction as per 15A NCAC 18C .0300 et. seq., Plans and specifications should be submitted to 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. All public water supply systems must comply with state and federal drinking water monitoring requirements. For more information, contact the Public Water Supply Section, (919) 707-9100.		30 days
<input type="checkbox"/>	If existing water lines will be relocated during the construction, plans for the water line relocation must be submitted to the Division of Water Resources/Public Water Supply Section at 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. For more information, contact the Public Water Supply Section, (919) 707-9100.		30 days
<input checked="" type="checkbox"/>	Plans and specifications for the construction, expansion, or alteration of the <u>Town of Cary</u> water system must be approved through the <u>Town of Cary</u> delegated plan approval authority. Please contact them at <u>919-460-4933</u> for further information.		



State of North Carolina Department of Environmental Quality  
INTERGOVERNMENTAL REVIEW PROJECT COMMENTS

Reviewing Regional Office: Raleigh  
Project Number: 23-0141 Due Date: 2/23/2023  
County: Wake Durham

Other Comments (attach additional pages as necessary, being certain to comment authority)

Division	Initials	No comment	Comments	Date Review
DAQ	SH	<input type="checkbox"/>	See checked boxes above.	1/30/2023
DWR-WQROS (Aquifer & Surface)	&	<input type="checkbox"/>	&	/ /
DWR-PWS	SG	<input type="checkbox"/>	See checked box above.	2/15/2023
DEMLR (LQ & SW)	WHD	<input type="checkbox"/>	See checked boxes.	2/14/2023
DWM – UST	MRP	<input type="checkbox"/>	See checked box. Notify the UST Section-RRO in the event of new petroleum spills or if previously unknown releases (impacted soil) are discovered during demolition or construction activities.	2/23/2023
Other Comments		<input type="checkbox"/>		/ /

**REGIONAL OFFICES**

Questions regarding these permits should be addressed to the Regional Office marked below.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> <b>Asheville Regional Office</b><br>2090 U.S. 70 Highway<br>Swannanoa, NC 28778-8211<br>Phone: 828-296-4500<br>Fax: 828-299-7043  | <input type="checkbox"/> <b>Fayetteville Regional Office</b><br>225 Green Street, Suite 714,<br>Fayetteville, NC 28301-5043<br>Phone: 910-433-3300<br>Fax: 910-486-0707 | <input type="checkbox"/> <b>Mooresville Regional Office</b><br>610 East Center Avenue, Suite 301,<br>Mooresville, NC 28115<br>Phone: 704-663-1699<br>Fax: 704-663-6040 |
| <input checked="" type="checkbox"/> <b>Raleigh Regional Office</b><br>3800 Barrett Drive,<br>Raleigh, NC 27609<br>Phone: 919-791-4200<br>Fax: 919-571-4718 | <input type="checkbox"/> <b>Washington Regional Office</b><br>943 Washington Square Mall,<br>Washington, NC 27889<br>Phone: 252-946-6481<br>Fax: 252-975-3716           | <input type="checkbox"/> <b>Wilmington Regional Office</b><br>127 Cardinal Drive Ext.,<br>Wilmington, NC 28405<br>Phone: 910-796-7215<br>Fax: 910-350-2004             |
|  | <input type="checkbox"/> <b>Winston-Salem Regional Office</b><br>450 Hanes Mill Road, Suite 300,<br>Winston-Salem, NC 27105<br>Phone: 336-776-9800<br>Fax: 336-776-9797 |  |

## Department of Environmental Quality Project Internal Review

Project Number: 23-0141

County: Wake, Durham

Date Received: 1-27-2023

**Due Date: 2-23-2023****Project Description:**

*Environmental Assessment - Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Brier Creek Reservoir, construction of drainage improvements, relocation of a portion of Lumley Road, utility relocations, demolition of four airport-owned buildings, relocation of aircraft navigational aids, acquisition of property, and removal and/or mitigation of obstacles in accordance with Federal Aviation Administration safety standards. <https://www.airportprojects.net/rdu-ea/reports-documents/>*

This Project is being reviewed as indicated below:

Regional Office	Regional Office Area	In-House Review	
<input type="checkbox"/> Asheville	<input checked="" type="checkbox"/> Air	<input type="checkbox"/> Air Quality	<input type="checkbox"/> Coastal Management
<input type="checkbox"/> Fayetteville	<input type="checkbox"/> DWR	<input checked="" type="checkbox"/> Waste Mgmt	<input type="checkbox"/> Marine Fisheries
<input type="checkbox"/> Mooresville	<input checked="" type="checkbox"/> DWR - Public Water	<input checked="" type="checkbox"/> Water Resources Mgmt (Public Water, Planning & Water Quality Program)	<input type="checkbox"/> CC & PS Div. of Emergency Mgmt
<input checked="" type="checkbox"/> Raleigh	<input checked="" type="checkbox"/> DEMLR (LQ & SW)	<input checked="" type="checkbox"/> DWR-Transportation Unit <u>Rob</u>	<input type="checkbox"/> DMF-Shellfish Sanitation
<input type="checkbox"/> Washington	<input checked="" type="checkbox"/> DWM		<input type="checkbox"/> Wildlife
<input type="checkbox"/> Wilmington			<input checked="" type="checkbox"/> Wildlife/DOT <u>Travis</u>
<input type="checkbox"/> Winston Salem			

Manager Sign-Off/Region:	Date: 2/13/2023	In-House Reviewer/Agency: WRM/DWR/David Wainwright
--------------------------	--------------------	---

Response (check all applicable)

No objection to project as proposed.
  No Comment

Insufficient information to complete review
  Other (specify or attach comments)

No additional comments.

Control No.: 23-E-0000-0141

Date Received: 1/27/2023

County: WAKE, DURHAM

Agency Response: 2/27/2023

Review Closed: 2/27/2023

DEVON BORGARDT  
CLEARINGHOUSE COORDINATOR  
DEPT OF NATURAL & CULTURAL  
RESOURCE

Project Information

Type: National Environmental Policy Act Environmental Assessment

Applicant: Raleigh-Durham Airport Authority

Project Desc.: Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Brier Creek Reservoir, construction of drainage improvements, relocation of a portion of Lumley Road, utility relocations, demolition of four airport-owned buildings, relocation of aircraft navigational aids, acquisition of property, and removal and/or mitigation of obstacles in accordance with Federal Aviation Administration safety standards.

As a result of this review the following is submitted:

No Comment

Comments Below

Documents Attached

Reviewed By: DEVON BORGARDT

Date: 2/24/2023



**North Carolina Department of Natural and Cultural Resources  
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary, Darin J. Waters, Ph.D.

February 24, 2023

Chris Babb  
Landrum & Brown  
4445 Lake Forest Drive, Suite 700  
Cincinnati, OH 45242

[RDUEA@landrumbrown.com](mailto:RDUEA@landrumbrown.com)

Re: Draft Environmental Assessment for Reconstruction of Runway 5L/23R, Raleigh-Durham International Airport, Raleigh, Wake County, 23-E-0000-0141, ER 20-2333

Dear Mr. Babb:

Thank you for your January 24, 2023, email providing notification that the Draft Environmental Assessment (DEA) for the above-referenced undertaking is available for review and comment.

Having reviewed the DEA that incorporates our comments concerning historic properties, we find that as proposed the undertaking will not affect any properties listed in or eligible for listing in the National Register of Historic Places. ] 13.1

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

*Renee Gledhill-Earley*

for Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Jackie Sweatt-Essick, FAA/Memphis  
Crystal Best, State Clearinghouse

[Jackie.Sweatt-Essick@faa.gov](mailto:Jackie.Sweatt-Essick@faa.gov)  
[crystal.best@doa.nc.gov](mailto:crystal.best@doa.nc.gov)

Control No.: 23-E-0000-0141

Date Received: 1/27/2023

County: WAKE, DURHAM

Agency Response: 2/27/2023

Review Closed: 2/27/2023

JOSEPH HUDYNIA  
CLEARINGHOUSE COORDINATOR  
DEPT OF AGRICULTURE

Project Information

Type: National Environmental Policy Act Environmental Assessment

Applicant: Raleigh-Durham Airport Authority

Project Desc.: Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Brier Creek Reservoir, construction of drainage improvements, relocation of a portion of Lumley Road, utility relocations, demolition of four airport-owned buildings, relocation of aircraft navigational aids, acquisition of property, and removal and/or mitigation of obstacles in accordance with Federal Aviation Administration safety standards.

As a result of this review the following is submitted:

No Comment

Comments Below

Documents Attached

} 1.6

Reviewed By: JOSEPH HUDYNIA

Date: 2/1/2023

Control No.: 23-E-0000-0141  
County: WAKE, DURHAM

Date Received: 1/27/2023  
Agency Response: 2/27/2023  
Review Closed: 2/27/2023

JINTAO WEN  
CLEARINGHOUSE COORDINATOR  
DPS - DIV OF EMERGENCY MANAGEMENT

Project Information

Type: National Environmental Policy Act Environmental Assessment  
Applicant: Raleigh-Durham Airport Authority  
Project Desc.: Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Brier Creek Reservoir, construction of drainage improvements, relocation of a portion of Lumley Road, utility relocations, demolition of four airport-owned buildings, relocation of aircraft navigational aids, acquisition of property, and removal and/or mitigation of obstacles in accordance with Federal Aviation Administration safety standards.

As a result of this review the following is submitted:

No Comment       Comments Below       Documents Attached

} 1.0

Reviewed By: JINTAO WEN

Date: 2/21/2023

Control No.: 23-E-0000-0141

Date Received: 1/27/2023

County.: WAKE, DURHAM

Agency Response: 2/27/2023

Review Closed: 2/27/2023

JESSICA MOSLEY  
CLEARINGHOUSE COORDINATOR  
DEPT OF TRANSPORTATION

Project Information

Type: National Environmental Policy Act ironmental Assessment

Applicant: Raleigh-Durham Airport Authority

Project Desc.: Proposed project is for the relocation of Runway 5L/23R approximately 537 feet northwest of existing Runway 5L/23R and, after construction is complete, converting the existing Runway 5L/23R to a taxiway. The project also includes use of fill material from Airport borrow sites, use of water from Brier Creek Reservoir, construction of drainage improvements, relocation of a portion of Lumley Road, utility relocations, demolition of four airport-owned buildings, relocation of aircraft navigational aids, acquisition of property, and removal and/or mitigation of obstacles in accordance with Federal Aviation Administration safety standards.

As a result of this review the following is submitted:

No Comment

Comments Below

Documents Attached

1.6

Reviewed By: JESSICA MOSLEY

Date: 2/20/2023



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Raleigh ES Field Office  
Post Office Box 33726  
Raleigh, North Carolina 27636-3726

08 March 2023

Tommy L. Dupree, Manager  
Memphis Airports District Office  
2600 Thousand Oaks Blvd., Suite 2250  
Memphis, TN 38118-2486

Subject: Proposed Runway 5L/23R Replacement Project; Raleigh-Durham International Airport  
Draft Environmental Assessment  
Wake County, North Carolina

Dear Mr. Dupree:

This letter is in response to the January 25, 2023, draft Environmental Assessment (EA) for the proposed Runway 5L/23R Replacement Project at Raleigh-Durham International Airport (RDU), located in Wake County, North Carolina. The U.S. Fish and Wildlife Service (Service) has reviewed the draft EA and associated documents. The Service previously provided comments to the project by letter dated November 15, 2022, and our comments from that letter remain valid. Our comments are provided in accordance with the National Environmental Policy Act (NEPA), Endangered Species Act of 1973, as amended, (ESA) and the Bald and Golden Eagle Act (BGEPA).

Most of the Service’s previous comments and recommendations have been incorporated into the draft EA. However, we recommend that more detail be provided in Section 4.3 (Biological Resources), particularly information regarding the bald eagle nest and tricolored bats.

} 7.2

Bald Eagle Nest

The Biological Resources Assessment in Appendix D (BRA) commits to providing a 660 – foot buffer around the bald eagle nest during the bald eagle breeding season. In addition, preliminary noise modeling indicates that the nest would receive an increase of 2.6 dBA (weighted decibel level) from the project by 2033 when the proposed project would be fully operational. The information on the modeled decibel levels is not provided in the body of the draft EA. The Service recommends that the information from Table 3 of the BRA (“Potential noise level impacts on bald eagle nest”) be included in the body of the draft EA, with a short discussion. The table and noise level discussion could also be included in Appendix F (“Noise”). Further, the Service recommends that language in Section 4.3 include a statement concerning the distance of the borrow area, where blasting is proposed, from the bald eagle nest. The Service calculates that the borrow area is more than 0.5 miles from the nest, which complies with the recommendations in the National Bald Eagle Management Guidelines Avoid to “avoid blasting and other activities that produce extremely loud noises within 1/2 mile of active nests....”

} 7.2



We continue to recommend that the FAA consider the implementation of other recommendations in the National Bald Eagle Management Guidelines for the benefit of the bald eagle, and list any measures that will be applied in the final EA. The guidelines may be found here: <https://www.fws.gov/media/national-bald-eagle-management-guidelines>.

} 7.2

Tricolored Bat

The Service recommends that language in the EA reflect that a tricolored bat was captured by mist-net in 2002 in Umstead State Park, about 3.5 miles from the project site. Very limited information is provided in the body of the EA on culvert work to be conducted on site, and the FAA may wish to add language stating that the Service has requested culvert surveys on the site for tricolored bat. At a minimum, surveys should be conducted in winter and summer. Survey plans should be coordinated with the Service ahead of time.

} 7.2

We appreciate the opportunity to comment on this project. If you have any questions concerning these comments, please contact Kathy Matthews by e-mail at <kathryn\_matthews@fws.gov>.

Sincerely,



for Pete Benjamin  
Field Supervisor

cc (via email):

Lyle Phillips, USACE  
Chris Babb, Landrum & Brown  
Gabriela Garrison, NCWRC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
 ATLANTA FEDERAL CENTER  
 61 FORSYTH STREET  
 ATLANTA, GEORGIA 30303-8960

March 13, 2023

Chris Babb  
 Landrum & Brown  
 4445 Lake Forest Drive, Suite 700  
 Cincinnati, Ohio 45242

Re: EPA Comments on Draft Environmental Assessment for the Replacement of Runway  
 5L/23R at Raleigh-Durham International Airport, North Carolina

Dear Mr. Babb:

The U.S. Environmental Protection Agency (EPA) received the referenced document and has reviewed the subject proposal in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The EPA understands that Raleigh-Durham Airport Authority (RDU) is conducting an Environmental Assessment (EA) for the proposed replacement and related improvements of Runway 5L/23R.

To meet the project's purpose and need that were developed in response to RDU's Vision 2040 Master Plan, RDU evaluated several Action Alternatives and the No-Action Alternative. Existing surfaces of Runway 5L/23R have become degraded and create hazards from foreign object debris that would continue to necessitate periodic runway closures for maintenance and repair under the No-Action Alternative. The requirement to maintain uninterrupted aviation operations at RDU-- is not consistent with Action Alternatives that would reconstruct one of RDU's three runways in its existing location. Accordingly, in the EA, alternatives that would construct a runway offsite, or further northwest, or longer than Alternative C3, the Preferred Alternative, were eliminated from further analysis because they would not meet the project's purpose.

Under Alternative C3, Runway 5L/23R would be relocated 537 feet to the northwest of its current location and the existing 10,000-foot runway would be converted into a taxiway. The replacement runway's dimensions would extend 10,639 feet. Navigational aids and lighting would be moved to the new runway. Lumley and Perimeter Roads would also be moved to accommodate the new runway. The new portion of Perimeter Road would extend 15,000 feet. Additional improvements would include construction of ancillary stormwater drainage structures and graded surfaces. Up to 5 million cubic yards of fill soil would be transported from borrow sites on existing RDU property to support construction and elevation changes. Construction is proposed to begin in 2023 and end in 2030.

The EPA understands that RDU's preferred alternative is the Proposed Action Alternative. Based on a review of the Draft EA, the EPA has not identified any significant environmental impacts from the

71.8

Proposed Action that would require substantive changes to the EA. The EPA has enclosed detailed technical comments for your consideration (See enclosure).

1.8

The EPA appreciates the opportunity to review the Draft EA for Replacement of Runway 5L/23R at Raleigh-Durham International Airport. If you have questions regarding our comments, please contact Douglas White, Project Manager in the NEPA Section at [white.douglas@epa.gov](mailto:white.douglas@epa.gov), or at 404-562-8586.

Sincerely,

Ntale Kajumba  
Chief  
NEPA Section

Enclosure

Enclosure**EPA Comments on the Draft Environmental Assessment for the Replacement of Runway 5L/23R at Raleigh-Durham International Airport, North Carolina**

**Air Quality:** The Proposed Action is in Wake County, North Carolina which is currently in Maintenance Status with the National Ambient Air Quality Standards for 1-Hour Ozone. RDU analyzed air quality impacts from the Proposed Action using the Federal Aviation Administration's (FAA) Aviation Environmental Design Tool (AEDT), EPA's Motor Vehicle Emissions Simulator, and the Transportation Research Board's Airport Construction Emissions Inventory Tool. Air emissions inventories evaluated for construction and post construction phases of this project indicate that General Conformity requirements will be met because precursor pollutants of ozone, volatile organic compounds, and nitrogen oxides, would remain below the federal *de minimis* thresholds of 100-tons per year for each of these pollutants. While Section 1.2 of the Draft EA states that the Proposed Action will not induce a change in the number or type of aircraft operations, RDU acknowledges the projected increase in operations that would occur and analyzes projected emissions through 2033.

**Recommendation:** In accordance with Section 4.2.7 Mitigation, Avoidance, and Minimization Measures, the EPA recommends implementing Best Management Practices (BMP) to reduce diesel emissions, such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training or contracting policies. The EPA also encourages reducing fugitive dust and diesel emission by implementing the conveyor belt system that RDU has evaluated for transporting fill material for this project and operating the conveyor through the electrical grid, where practicable.

] 8.3

**Hazardous Materials and Contamination:** Section 3.6.2 of the Draft EA provides an accurate summary of the history, nature, and extent of contamination that led to the listing of the Ward Transformer Site on the National Priorities List (NPL). The associated figures of this section also depict the areal extent of the NPL site as well as key features. This site is located on RDU property that would underlie a section of the proposed relocation of Lumley Road. Approximately 23,200-cubic yards of Polychlorinated biphenyls (PCB) contaminated soil would be excavated from this site and transported to an appropriately permitted disposal facility in accordance with applicable regulations or retained on-site. The Draft EA indicates that in-situ PCB-contaminated soil and bedrock within the relocated Lumley Road alignment to the west of the backfilled area with the geotextile fabric barrier is anticipated to be at sufficient depth as to not be encountered during roadway construction. PCB-contaminated sediments are also found in the Briar Creek Reservoir and some of its tributaries. RDU is coordinating with the EPA to verify that the Proposed Action will not interfere with ongoing remediation efforts or transport contaminated materials to uncontaminated areas. The estimated timeline for future cleanup progress cited by Section 3.6.2 remains accurate. EPA is working toward signature of a Record of Decision before September 2023 with Remedial Design and Remedial Action to follow.

**Recommendation:** The EPA recommends continued communication and coordination of planned and ongoing activities between the EPA, FAA, the North Carolina Department of Environmental Quality (NCDEQ), RDU, contractors, and the public. In accordance with Section 4.6.2.2 Hazardous Materials and Pollution Prevention, the EPA recommends the use of secondary containment for storage and

] 10.10

handling of Petroleum, Oils, and Lubricants (POL) to protect surface waters of Wake County and as required by the Clean Water Act. Where secondary containment is not directly practicable, spill ponds and oil water separators should be constructed downstream of POL related activities. Construction and operations in support of the Proposed Action should ensure that Resource Conservation and Recovery Act-regulated solid wastes generated are disposed of in accordance with federal regulations.

10.10

**Environmental Justice and Noise:** The EPA supports efforts to mitigate environmental impacts to communities surrounding RDU and the Proposed Action. As identified in Section 3.11.2 Environmental Justice (EJ), AEDT assessed data from the U.S. Census Bureau shows that two of six RDU adjacent census tracts have a People of Color population of 60% and 50.4% residing within the project area. The draft EA states that the proposed action would not result in disproportionately high and adverse human health or environmental effects on minority populations and low-income populations. Section 3.10 Noise and Noise-Compatible Land Use states that AEDT derived noise modeling has identified 17 single-family homes within the 65 Day-Night Average Sound Level (DNL) contour, most of which do not house residents with EJ concerns. The EPA understands that the proposed action will mitigate effects from the possible increase of noise from the relocation of Runway 5L23R using RDU's provision for sound insulation to homes affected by noise levels exceeding the 65 DNL.

Recommendation: The EPA recommends RDU and FAA continue coordination efforts such as those identified in Section 5.3 of the Draft EA throughout the proposed development of this project, include any community feedback received within the final EA, and meaningfully engage and work communities, including those with environmental justice concerns, residing near the project area to address identified impacts and to disseminate project status updates.

14.2

**Water Resources and Wetlands:** Areas to be permanently altered by the Proposed Action are situated in an industrially developed area with interspersed creeks, wetlands, and the Briar Creek Reservoir. In addition to runway and road construction, temporary disturbances will be made to the forested soil borrow areas. Section 4.13 of the Draft EA states that RDU will acquire the necessary National Pollutant Discharge Elimination System (NPDES) permit from NCDEQ prior to commencing construction. RDU is also coordinating with the U.S. Army Corps of Engineers and NCDEQ for the Clean Water Act Section 404 permitting and mitigation necessary because of possible impacts to 8,780 feet of jurisdictional streams and 1.56-acres of wetlands. Should fill material be placed in the 100-year floodplain, RDU will first acquire a permit from the State of North Carolina.

Recommendation: The EPA recommends that modifications to the existing airport stormwater management system, to account for the increase in impervious pavement, include measures to maintain existing stormwater runoff profiles of the project area. The EPA also recommends that BMPs identified by the Storm Water Pollution Prevention Plan be included in the final EA.

9.9

**Biological Resources:** The EPA understands that RDU is coordinating with the U.S. Fish and Wildlife Service (FWS) regarding compliance with the Endangered Species Act. Section 3.3.2 Federally Listed Threatened and Endangered Species indicates that no critical habitat is present within the detailed study area. One bald eagle nest was identified, approximately 1,900 feet north of the existing Runway 5L/23R. The EPA understands that Runway Safe Area (RSA) requirements associated with the Proposed Action and relocation of roads may necessitate the permanent removal of forest located in runway approach zones. Additional forest removal may be required to remove fill materials from the borrow area. The

EPA also understands that no activities associated with the Proposed Action will take place at William B. Umstead State Park as a condition of the FAA's significance determination and the relocation of Runway 5L/23R will move an existing flight path further northwest of the park's airspace.

Recommendation: The EPA principally defers to the FWS regarding compliance with the Endangered Species Act. The EPA recommends that all conservation measures identified by FWS be implemented. Forest planting and stream protection and renewal should take place in areas of temporary disturbance. The EPA defers to the FAA regarding RSA requirements and recommends the maximum conservation of natural resources, where allowed by law and safety requirements.

] 7.6

**Energy Efficiency and Recycling:** Section 4.6.2.2 and 4.9.4 Mitigation, Avoidance, and Minimization indicate RDU's intention to recycle construction debris for on-site purposes and conserve natural resources, generally reduce solid waste through recycling efforts, and conserves energy with light-emitting diode lighting and fritted glass to reduce cooling needs.

Recommendation: The EPA recommends that any offsite disposal of recyclable materials such as concrete, steel, and asphalt prioritize recycling where practicable. The EPA also recommends the use of renewable energy including solar power for supplemental electricity and lighting for the runway, taxiways, and roads that may be constructed.

] 11.1

**COMMENT FORM**  
**PUBLIC WORKSHOP AND HEARING**  
**RALEIGH-DURHAM INTERNATIONAL AIRPORT**  
**ENVIRONMENTAL ASSESSMENT**  
**PROPOSED RUNWAY 5L/23R REPLACEMENT PROJECT**  
**February 28, 2023**

This comment form is provided to receive your input and ensure that your comments are considered. Please use this form to submit written comments. Either place the form in the comment box at the Public Workshop and Hearing, or mail to the address below not later than 5:00pm Monday, **March 13, 2023**.

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

Our world class universities and corporations of the triangle are performing cutting edge research and need the new runways to have convenient and safe access to the world markets.

1.1

Submit comments to:

Chris Babb, Landrum & Brown  
 RE: RDU EA  
 4445 Lake Forest Drive, Suite 700  
 Cincinnati, OH 45242

**FROM (Please Print):**

**Name:** Michael Groonspon  
**Address:** 124 Allison Way  
Cary NC 27511

**COMMENT FORM**  
**PUBLIC WORKSHOP AND HEARING**  
**RALEIGH-DURHAM INTERNATIONAL AIRPORT**  
**ENVIRONMENTAL ASSESSMENT**  
**PROPOSED RUNWAY 5L/23R REPLACEMENT PROJECT**  
**February 28, 2023**

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I support the new runway project as it is  
 critical to the passenger growth @ RDU.  
 It is also good for economic growth of the  
 Triangle area.

} 1.1

Submit comments to:

Chris Babb, Landrum & Brown  
 RE: RDU EA  
 4445 Lake Forest Drive, Suite 700  
 Cincinnati, OH 45242

FROM (Please Print):

Name: Dan Robinson  
 Address: 4008 Yarkin Dr  
Raleigh, NC 27609



**COMMENT FORM**  
**PUBLIC WORKSHOP AND HEARING**  
**RALEIGH-DURHAM INTERNATIONAL AIRPORT**  
**ENVIRONMENTAL ASSESSMENT**  
**PROPOSED RUNWAY 5L/23R REPLACEMENT PROJECT**  
**February 28, 2023**

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*With the fast development of the Raleigh Area, there is a desperate need for the new runway which in turn supports the terminal growth and expansion. The population growth is heading to new heights and will require new destination including international travel. Let's build the new runway!*

1.1

Submit comments to:

Chris Babb, Landrum & Brown  
 RE: RDU EA  
 4445 Lake Forest Drive, Suite 700  
 Cincinnati, OH 45242

FROM (Please Print):  
 Name: JOSEPH ERHART  
 Address: SAIL ENTIC COURT  
RALEIGH, NC. 27615

**COMMENT FORM**  
**PUBLIC WORKSHOP AND HEARING**  
**RALEIGH-DURHAM INTERNATIONAL AIRPORT**  
**ENVIRONMENTAL ASSESSMENT**  
**PROPOSED RUNWAY 5L/23R REPLACEMENT PROJECT**  
**February 28, 2023**

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*THIS PROJECT IS VERY MUCH NEEDED. THE TRIANGLE IS ONE OF THE FASTEST GROWING REGIONS IN THE COUNTRY. IN ORDER TO MAINTAIN ECONOMIC VITALITY AND QUALITY OF LIFE IN THE REGION, WE NEED TO SMARTLY EXPAND OUR TRANSPORTATION INFRASTRUCTURE. THE RUNWAY REPLACEMENT IS ONE OF SUCH PROJECT. I FULLY SUPPORT THIS PROJECT*

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1.1

Submit comments to:

Chris Babb, Landrum & Brown  
 RE: RDU EA  
 4445 Lake Forest Drive, Suite 700  
 Cincinnati, OH 45242

**FROM (Please Print):**  
**Name:** A. BATTLE WHITLEY, II  
**Address:** 112 NORTH TRAIL DRIVE  
RALEIGH, NC 27615

**COMMENT FORM**  
**PUBLIC WORKSHOP AND HEARING**  
**RALEIGH-DURHAM INTERNATIONAL AIRPORT**  
**ENVIRONMENTAL ASSESSMENT**  
**PROPOSED RUNWAY 5L/23R REPLACEMENT PROJECT**  
**February 28, 2023**

This comment form is provided to receive your input and ensure that your comments are considered. Please use this form to submit written comments. Either place the form in the comment box at the Public Workshop and Hearing, or mail to the address below not later than 5:00pm Monday, **March 13, 2023**.

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

I am Jessica Graber, a Wake Co. resident, and my company - McKim & Creed is HQ'd in Raleigh, NC. McKim & Creed is a member of the Regional Transp Alliance (RTA) and we support the funding of a new, larger, re-located primary runway. The new runway + new location will enable the planned + needed main T-2 expansion. McKim & Creed has 800+ employees located along the east coast. We have people using RDU facilities daily. The expansion of T-2, the increase of future direct flights - are just 2 of many positive impacts of the runway relocation.

Submit comments to:

Chris Babb, Landrum & Brown  
 RE: RDU EA  
 4445 Lake Forest Drive, Suite 700  
 Cincinnati, OH 45242

**FROM (Please Print):**

**Name:** Jessica F. Graber  
**Address:** 223 W. Sycamore Ave.  
Wake Forest, NC 27507  
919.896.2390

**COMMENT FORM**  
**PUBLIC WORKSHOP AND HEARING**  
**RALEIGH-DURHAM INTERNATIONAL AIRPORT**  
**ENVIRONMENTAL ASSESSMENT**  
**PROPOSED RUNWAY 5L/23R REPLACEMENT PROJECT**  
**February 28, 2023**

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The Greater Durham Chamber of Commerce  
 strongly endorses a request from Raleigh-Durham  
 International Airport (RDU) to replace and  
 relocate its primary commercial service runway,  
 5L-23R.

} 1.1

Submit comments to:

Chris Babb, Landrum & Brown  
 RE: RDU EA  
 4445 Lake Forest Drive, Suite 700  
 Cincinnati, OH 45242

**FROM (Please Print):**

**Name:** Bryan Fox  
**Address:** 300 W Morgan St #1400  
Durham, NC 27701

HEARING OF PROPOSED CHANGES TO RUNWAY AT RDU INTERNATIONAL AIRPORT  
Hearing on 02/28/2023

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HEARING OF PROPOSED CHANGES TO THE RUNWAY AT RDU  
INTERNATIONAL AIRPORT

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Raleigh, North Carolina

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February 28, 2023, 5:00 p.m.

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Reported By:  
25 SUSAN GALLAGHER, CVR  
Transcript produced by computer-aided transcription

1 Raleigh, North Carolina

2 MR. ADAMS: Hello. It is 5:00 p.m. on February 28,  
3 2023. I am officially opening the public hearing being  
4 conducted for the draft environmental assessment for  
5 the proposed runway 5L/23R replacement project at the  
6 Raleigh-Durham International Airport. My name is Rob  
7 Adams, and I will serve as the hearing officer for  
8 tonight's hearing.

9 The purpose of this hearing is to collect comments  
10 concerning the adequacy of the information disclosed in  
11 the draft EA. I'd like to take this opportunity to  
12 make sure that everyone understands that no decision  
13 will be made tonight regarding the approval of the  
14 proposed project. Tonight's hearing is not a  
15 question-and-answer type of forum. The Raleigh-Durham  
16 Airport, Federal Aviation Administration, US Army Corps  
17 of Engineers, and consulting team are here to listen,  
18 but they are not going to respond to questions about  
19 the pros and cons of the proposed project.

20 Following this hearing and the close of the comment  
21 period, the Federal Aviation Administration, US Army  
22 Corps of Engineers, and the Raleigh-Durham Airport  
23 Authority will then correct and revise the EA as  
24 necessary based on the comments received. They will  
25 also prepare responses to the comments received and

1 include those responses, along with the comments, in  
2 the final EA.

3 Before we begin receiving verbal comments, I'd like  
4 to let you know the ground rules of the hearing.  
5 First, as I said earlier, we're not here to respond to  
6 questions about this project. We are only here to  
7 listen to your comments and take notes. We also have a  
8 court reporter present to ensure that there is an  
9 accurate transcript of the comments you make at this  
10 hearing.

11 For anyone that would like to speak, we ask that  
12 you fill out a speaker card, and then we'll call you up  
13 in the order they were received. So that everyone gets  
14 an opportunity to provide verbal comments, everyone  
15 will get three minutes to speak. To be fair to  
16 everyone, I am not going to allow people to transfer  
17 their allotted time to someone else.

18 I ask that when you speak, you give us your name  
19 and address for the record. If there is anyone that is  
20 uncomfortable speaking in front of a group or if you  
21 need more than three minutes to provide your comments,  
22 we ask that you provide your comments in writing.

23 We have comment sheets around the room. You can  
24 complete them here and drop them in the comment boxes,  
25 or you can take them home and fold them up, put a stamp

1 on it, and mail them in. I'd like you to mail them to  
2 us so that they are received no later than Monday,  
3 March 13th.

4 I want you to understand that a verbal comment is  
5 just as important as a written comment. So please feel  
6 free to provide any comments on the document you may  
7 have to us either verbally today or in writing.

8 Lastly, this hearing is scheduled to end at 7:00  
9 p.m. this evening. However, we will stay here for as  
10 long as necessary for everyone to get a chance to  
11 provide verbal comments on the draft EA.

12 Our job here today is to listen to your comments.  
13 At this time I ask that everyone in this area take a  
14 moment to turn off your cell phones and pagers to be  
15 courteous to those people making verbal comments at  
16 tonight's hearing. I will then begin by calling the  
17 first speaker and the person afterwards so you know  
18 when your turn is.

19 LISA LISKE: My name is Lisa Liske, and I'm here to  
20 voice my support for responsible and safe development  
21 at RDU, to serve the needs of the citizens both for  
22 transportation and to preserve the unique and beautiful  
23 setting that people fly here to enjoy and fly back to  
24 return to enjoy when we live here, and we are graced  
25 with important, undeveloped land around the airport,

TC001

71.9



1 many, many hundreds of acres of which are now  
2 threatened by development related to airport needs and  
3 desires.

1.9

4 And I am seeing that the runway is essential  
5 development, and I am hopeful that the proposed borrow  
6 sites for the soil that will be used in constructing  
7 the runway could come, not from the identified sites in  
8 the natural areas around the developed airport, but  
9 from the Martin Marietta quarry on Westgate Road, and I  
10 would like to see that all environmental mitigations  
11 possible are used to offset any damages to William  
12 Umstead State Park.

4.1

9.1

13 I am hopeful that the care taken by the  
14 environmental assessment will extend to the present  
15 wildlife and provision for that life, even if it's not  
16 on the endangered species list, that water sources will  
17 also be protected as much as possible, and that a  
18 strong plan for replanting any areas that might be  
19 deforested will be developed and complete.

7.1

20 I'm very concerned that the hundreds of acres of  
21 mature forest that are slated to be removed from the  
22 lands that RDU airport manages will be removing so many  
23 trees and so much wildlife in our time of climate  
24 change when many communities and countries around the  
25 world are struggling to plant trees to gain forested

8.1

1 land.

2 We have that land, and at this time it makes the  
3 most environmental and economic sense to keep the trees  
4 that we already have to, protect them by law, and to  
5 find ways to build where there are not presently  
6 charter forests and waterways that need to be healthy  
7 to keep our environment healthy.

8 JONATHAN KRAMER: Okay. My name is Jonathan  
9 Kramer. I live at 105 Greenwood Lane in Cary. I'm a  
10 retired professor at North Carolina State University in  
11 the field of arts studies and music, and my comments  
12 will be brief.

13 I understand that the runway is unsafe in the long  
14 run and in the medium run and needs to be replaced or  
15 repaired, and our concern regarding the runway issue is  
16 that it be done as responsibly as possible, as my  
17 partner just expressed. This area is a rare example of  
18 forestry and water stewardship that is very important  
19 to our communities and our state and everyone on the  
20 planet in terms of fresh water and clean air.

21 So the issue is for the runway, what must be done,  
22 please may it be done as responsibly as possible.  
23 However, there are other issues and plans afoot that  
24 affect our environment and are not included in this  
25 plan. These other projects include a new parking lot

7.7

TC002

1.10

1.10

15.1

1 and quarry in the vicinity of the airport on RDU lands.  
2 However, these lands are public lands, and we hope that  
3 cooler heads will prevail and that these two projects  
4 that are slated for the future are reconsidered and  
5 either abandoned or relocated farther away from this  
6 important environmental biological and recreational  
7 area.

8 JAY IRBY: My name is Jay Irby. I'm with First  
9 Citizens Bank, and we are part of the Regional  
10 Transportation Alliance. RTA supports the relocation  
11 of the primary runway because RDU's master plan calls  
12 for a purposeful development of the airport campus,  
13 including the relocation of the primary runway to the  
14 west, which will enable capacity expansion of main RDU,  
15 Terminal 2.

16 JOE MILAZZO: Hello. My name is Joe Milazzo, and  
17 I'm the executive director of the Regional  
18 Transportation Alliance, which is the voice of the  
19 regional business community on transportation in the  
20 metropolitan triangle area of North Carolina. The RTA  
21 supports a new relocated primary runway for our airport  
22 because RDU is a critical driver of job creation,  
23 prosperity, and quality of life throughout North  
24 Carolina's Research Triangle region and, indeed, much  
25 of Eastern North Carolina and even portions of Southern

15.1

TC003

1.1

3.3

TC004

1.1

1 Virginia. Economic footprint continues to grow, and it  
2 is dependent on a successful runway, and we need the  
3 runway to be expanded and ready for the future of this  
4 market.

3.4

5 JACOB RIGG: Hi. My name is Jacob Rigg. I work at  
6 the Raleigh Chamber of Commerce in the Regional  
7 Transportation Alliance division. RTA supports the new  
8 relocated primary runway because the Research Triangle  
9 region of North Carolina grew by more than 377,000  
10 people between 2010 and 2022 and projects an expected  
11 another 1.4 million residents to our region by 2050.

TC005

1.1

12 MATT CHAMBERS: My name is Matt Chambers. I'm a  
13 senior director of corporate project development for  
14 Clancy & Theys. We are headquartered here in the  
15 Triangle, but operate from Virginia to Florida. We are  
16 also members of the Regional Transportation Alliance,  
17 which supports the new relocated runway project. The  
18 Raleigh Durham Airport is an economic driver for this  
19 market and is a treasured asset for this region, and  
20 with the growth that we are seeing in the market, it's  
21 a definite need for this new runway, and we are fully  
22 supportive of that.

TC006

1.1

23 JOHN McGEARY: Hello. John McGeary. I'm part of  
24 the Regional Transportation Alliance, and RTA's in  
25 support of relocation and expansion of the primary

TC007

1.1

1 runway for RDU. The Raleigh region is one of the  
2 fastest growing regions in the country, and it's  
3 important for our transportation infrastructure to  
4 remain at a level that will continue to attract not  
5 only people, but some of the best-in-class companies.  
6 Once we're behind, we'll never catch up. So this is  
7 important to be able to actually find the federal  
8 funding to help actually relocate the runway to stay,  
9 kind of, engaged in the growth of the market and be  
10 able to keep up with that growth and what's here and  
11 also what's coming.

12 RICHARD HANCOCK: Hi. My name is Richard Hancock,  
13 and I live in Durham, North Carolina, and my company,  
14 HCR, is part of the Regional Triangle Alliance. RTA  
15 supports a new relocated primary runway because RDU's  
16 master plan calls for the purposeful development of the  
17 airport campus, including the relocation of the primary  
18 runway to the west, which will enable capacity  
19 expansion of the main RDU Terminal 2.

20 JOSH HARRIS: Hello. My name is Josh Harris, and I  
21 am here because I personally believe that this  
22 expansion is vital to our community, and as we grow,  
23 our community has to grow with it and along with our  
24 infrastructure. So I'm here to show support and help  
25 back this project.

] 1.1

TC008

] 1.1

] 3.3

TC009

] 3.4

] 1.1

1           BETSY BEALS: My name is Betsy Beals, and I live in  
 2 Cary, North Carolina. I am on -- next to Raleigh  
 3 Durham Airport boundary line and Umstead Park boundary  
 4 line. I have some concerns about the airport using and  
 5 cutting trees. The reason for that is that there will  
 6 be additional noise occurring where I live.

TC010

} 6.2

7           When they cut trees before, I could hear more noise  
 8 from the airport. I also am concerned by cutting the  
 9 trees and changing the roads that the runoff goes into  
 10 Briar Creek and Little Briar Creek, which eventually  
 11 goes to into Lake Crabtree, which eventually goes into  
 12 my aquifer, and I'm on a well for my home, and I am  
 13 concerned that my well would be polluted with the  
 14 runoff from the superfund site that they're going to  
 15 put through the middle of it. The superfund site is  
 16 transformer, and that particular one, they're going to  
 17 cut Lumley Road on top of that superfund site, and so  
 18 I'm very concerned about that.

} 9.39

} 10.1

} 10.11

19           I think it's a waste of taxpayers' money to have an  
 20 airport that already existed in 1986 when they could  
 21 just replace the concrete slabs rather than replace the  
 22 whole runway. They say they needed to move it at over  
 23 537 feet so that big 787's can come in. We don't have  
 24 very many of those. So I think it is unnecessary for  
 25 this alternative. Therefore, I think they should not

} 3.1

} 3.2

} 3.5

} 1.4

1 do any alternatives, and I don't think they should  
2 build this runway 5 left, 32 right, over 500 feet and  
3 extend it.

1.4

4 They wanted to extend it to 11,500, but now they  
5 say they're going to do 10,400 or 634, but I really  
6 think that that is not good in the sense that we don't  
7 need it since we already have a functioning runway.

3.6

8 The other concern I have is the air is going to be  
9 changed with the fact that more airplanes, more cars  
10 are coming to the airport. There are also more parking  
11 lots. They're also building more concrete areas where  
12 there's more runoff. So I think all that is being  
13 built, it's going to pollute. The particulates in the  
14 air would be more.

8.2

15 I'm asthmatic. I've had cancer. I really want to  
16 make sure that my health is protected and that my home  
17 where I've lived for 56 years is also protected.  
18 That's where my son has grown up and where my husband  
19 and I have lived.

9.40

20 I think that this particular airport is a  
21 convenient airport for just the citizens of this area  
22 and that most people will fly to Charlotte or they will  
23 go to Atlanta or New York or Dulles to fly  
24 internationally. So I don't see that we need any  
25 international flights.

8.2

3.7

1 I do think that the expense of billions of dollars  
2 is something that is not necessary for our federal  
3 government to continue giving grants to the airport.  
4 They use their parking lot revenues for the --  
5 supposedly for the running of the airport.

3.1

6 And I come to every meeting at the Raleigh Durham  
7 Airport every month, and I attend all public hearings.  
8 I have asked to be on committees and have been told  
9 that I can read about it when I come to the meetings.  
10 I think they should have on their committees and  
11 advisory committees, there should be people who are  
12 contingent to the airport on both ends, should be able  
13 to have a voice and how things are prepared ahead of  
14 the game, rather than for the fact that you find out  
15 about it, and then you're asked, "Do you want to say  
16 anything about it?"

1.11

17 Well, they've already decided they want to put an  
18 eight-foot chain link fence with three strands of  
19 barbed wire to fence in my yard to protect it. That I  
20 think has been put on hold, but it's still on the ALP.  
21 It's still in budget plans. It's called perimeter  
22 fencing.

1.12

23 All of these things have come about in the last ten  
24 years, and they are moving at a fast pace, and you  
25 usually don't know about something until the very end



1 when they say they've got to make a decision within a  
2 month.

3 I don't know how many more minutes I have allowed,  
4 but I do want you to know that this is an important  
5 decision that the FAA needs to make for Raleigh-Durham,  
6 and I hope that Raleigh-Durham Airport Authority will  
7 listen to the current citizens who have said for years  
8 this is too much. You're going to harm and damage the  
9 green ways and Lake Crabtree and Umstead Park. They  
10 kind of say they are not going to have anything to do  
11 that will hurt them, but it will when the superfund  
12 site runoff runs.

13 Don't understand why the creek over by Haleys  
14 Branch is polluted and why it's not functioning right  
15 now, and I've asked about that, and I was told it  
16 needed to be fixed. That's been over three months.  
17 How long does it take to fix? I guess my three minutes  
18 is up. I'll wrap it up.

19 DAN ROBINSON: Hello. My name is Dan Robinson.  
20 I'm with Kimley-Horn & Associates, and I'm also here  
21 tonight with RTA, the Regional Transportation Alliance.  
22 And RTA, as well as myself, I do -- I am in favor of a  
23 new relocated primary runway. The growth of this area  
24 and RDU's success depend on this improvement, and I  
25 support it.

1.13

10.12

9.41

TC011

1.1

1           JEAN SPOONER: So Dr. Jean Spooner. I am the chair  
2 of the Umstead Coalition. We are the friends group  
3 that supports William B Umstead State Park, and my  
4 comments are primarily focused on William B Umstead  
5 State Park. William B Umstead State Park shares  
6 2.6 miles of common boundary with the RDU International  
7 AIRPORT. The park started as a National Park Service  
8 national park. It is protected under not only the  
9 4(f), which is a national register of historic places,  
10 North Carolina State Historic Preservation Act. It's a  
11 North Carolina nature preserve, and it's protected by  
12 the LWCF. All of those characteristics, including deed  
13 restriction and its applicability to the Everglades,  
14 1970s noise taking of 55 LDM is applicable to William B  
15 Umstead State Park. Yet now missing from the draft EA  
16 but should be required 55 LDF DML contours and  
17 information is applicable to this park. It has all of  
18 those protections, federal protections, and so those  
19 need to be added.

20           All of the water drainage areas and the managed  
21 property in the airport drain directly to William B  
22 Umstead State Park or indirectly to Briar Creek and  
23 Crabtree Lake into William B Umstead State Park, and so  
24 therefore all of the drainage areas and quantity and  
25 quality should be part of the assessment of the effect

TC012



6.1



9.43

1 of this project.

2 In particular, I'm concerned about the dirt borrow  
3 areas being left unseeded and exposed for runoff into  
4 the streams and into our park. The state laws, as  
5 evidenced from another major stockpile dirt project at  
6 the airport are insufficient to control runoff. We've  
7 had an unfortunate example where we had unstabilized  
8 dirt piles on the airport, and that sediment ends up in  
9 the park. So we need to go beyond the minimum  
10 standards of North Carolina and have phased grading and  
11 immediately reseeded so we do not have exposed area of  
12 dirt with sediment into our streams.

13 So, now, on the aspect of mitigation for the  
14 streams, those good number of the buffers, stream  
15 lanes, wetlands, and open waters will be impacted by  
16 this project, and therefore, there will be a  
17 mitigation. It makes sense that since these waters  
18 flow to William B Umstead State Park that mitigation be  
19 used, those funds be used to directly support the water  
20 quality protection and William B Umstead State Park and  
21 not be diverted to an off-site bank.

22 Now, there's cumulative effects of this project,  
23 and the State has asked for an EA -- agreed to an EA,  
24 not an EIS, in exchange for no major construction  
25 projects next to the park, and yet we now have a

9.43

9.2

9.1

15.1

1 massive 17,000 parking space being proposed in addition  
2 to another 4,200 spaces for the rental car storage  
3 right on top of the park, and I would submit that those  
4 are part of the secondary and cumulative effects that  
5 should be evaluated. And I would say that you should  
6 coordinate with the town of Cary for the water that you  
7 might need because in a drought they have allocated  
8 that water to some other purposes.

15.1  
9.3

9 But I'm going to close with the fact that we're  
10 supportive of having the runway farther from William B  
11 Umstead State Park to the West as proposed. So we like  
12 that aspect of this project very much. It's some of  
13 the details that I think need to be strengthened.

1.1

14 NATALIE LEW: My name is Natalie, and I have lived  
15 in this area since 1980. I travel for work. I'm a  
16 million miler with American Airlines, lifetime diamond  
17 with Hilton, and a frequent user of the William B  
18 Umstead State Park. So I've not had a chance to read  
19 the full EA because I just had surgery. I do plan to  
20 submit a written comment.

TC013

21 My comments now are related to the Crabtree Creek  
22 watershed project, the borrow dirt for the new runway,  
23 and Umstead State Park. So we need a formal assessment  
24 as to how the Crabtree Creek watershed program project  
25 that started in the mid-1950s affects this project. So

9.4

1 the Crabtree Creek watershed project was a federal  
2 funded and a state funded project. It created several  
3 dams along Crabtree Creek, two of which are on  
4 airport-managed properties. Remember, airport land is  
5 deeded to four owners, not to the airport.

9.4

6 One of the lakes is the Briar Reservoir. The other  
7 lake is Lake Crabtree. The Briar Creek reservoir is  
8 affected by this current project.

9.42

9 While the first goal of the Crabtree Creek  
10 watershed project was to control flooding. The  
11 secondary goal of that project was to provide  
12 recreation to the taxpayer as compensation for the  
13 taxpayer money that was used, and so currently the  
14 project -- the runway project is basically taking away  
15 the Briar Creek reservoir, and the taxpayer loses the  
16 Briar Creek Reservoir for future recreation.

9.5

17 We should be compensated somehow, and that  
18 compensation should be Lake Crabtree County Park, and  
19 keeping all land that's now with Lake Crabtree County  
20 Park as forested and as recreation. The report should  
21 not be permitted to develop any more at Lake Crabtree  
22 County Park for a number of reasons, but especially  
23 because of the taking of the Briar Creek Reservoir.  
24 Then for the borrow dirt, the final project -- we made  
25 a formal statement, a very specific statement, that

9.5

1 fill, no borrow dirt from -- for the new runway will  
2 come from any land between National Guard Drive and  
3 Umstead State Park. Those tracks are known locally as  
4 Odd Fellows, 286 West, 286 North, 286 East. And,  
5 again, it just needs to be a specific statement so that  
6 the airport doesn't take that land down the road, again  
7 those lands are on the critical acquisition list for  
8 Umstead State Park. So they are important.

9 And then my other thought was environmental  
10 justice, again, going back to no government entity  
11 should harm the public. Basically, we can't let the  
12 airport -- we can't let the airport -- so as part of  
13 environmental justice, we need to consider how the  
14 airport's taking of the Briar Creek Reservoir, which is  
15 part of the Crabtree Creek Watershed Program affects  
16 the local people and be compensated. That's all.

17 MR. ADAMS: It is now 7:04 p.m. on February 28,  
18 2023, and there are no more speakers signed up.  
19 Therefore, I am closing the public hearing for the  
20 draft environmental assessment for the proposed runway,  
21 5L/23R Replacement Project at the Raleigh-Durham  
22 International Airport.

23 (Proceedings concluded at 7:04 p.m.)

24  
25

5.1

14.1

1 STATE OF NORTH CAROLINA.

2 COUNTY OF ORANGE

3

4 CERTIFICATE OF REPORTER

5

6 I, SUSAN L. GALLAGHER, CVR, Notary Public do  
7 hereby certify that foregoing proceedings were taken  
8 and transcribed under my supervision and direction;  
9 that the parties were present as stated; and that I am  
10 not of counsel for or in the employment of any of the  
11 parties to this proceeding, nor am I financially or  
12 otherwise interested in the outcome of this  
13 proceeding.

14 I do further certify that the foregoing 18  
15 pages constitute a true and accurate transcript of the  
16 testimony.

17 This the 7th day of March, 2023.

18



19

20 SUSAN L. GALLAGHER, CVR  
21 Notary Public #20230500301

22

23

24

25

**From:** [JAMES HUNTER III](#)  
**To:** [RDUEA](#)  
**Subject:** INTERNATIONAL AIRPORT RUNWAY LAYOUT  
**Date:** Friday, February 3, 2023 9:26:49 PM

---

IN THAT MATTER RUNWAY IS THE STARTUP? RUNWAY 19 AND 29 ARE CC-1? CC-3 IS 39 AND 49?  
CC-4 IS 14 AND 22? NOTE: CC-2 IS CONCRETE?

] 1.2



**From:** Lisa Montone  
**To:** RDUEA  
**Subject:** Parking lot invites more noise and air pollution from cars. Consider alternatives to Parking Lot Economy 3 Expansion  
**Date:** Sunday, February 5, 2023 11:54:39 AM

---

RDUEA Chris Babb, RDU EA,

Process should be transparent to the public: Tell the RDUA that they need to be more transparent with their processes, and that the public deserves to be a part of the process in designing Economy 3 because their actions have a direct impact on the visitors to the Umstead State Park and the East Coast Greenway

] 1.14

] 1.3

Two-Way Dialog with the Public: Ask the RDUA to implement meaningful, two-way dialog on the design of all phases of the expansion of Park Economy 3.

] 1.3

Consider alternative areas for development: Tell the RDUA that there are other areas to develop parking like on the other side of National Guard Drive (from 286) or on the other side of Aviation or even on the other side of the airport. Design and location options should be seriously evaluated with public input.

] 1.3

Need for wide buffers along Umstead State Park & East Coast Greenway: Let the RDUA know that any parking expansion should include wide buffers along Umstead State Park and the East Coast Greenway (aka Old Reedy Creek Recreation Corridor) and be designed to protect irreplaceable natural community assets like The William B. Umstead State Park and the Old Reedy Creek recreation corridor.

] 5.4

] 1.3

RDU is a major Urban Heat Island and has poor stormwater retention measures: RDU is already a huge heat island contributor to the area, which will be exacerbated by the conversion of green space to pavement. Their typical parking lot design excludes shade trees, does not prevent leaking vehicle fluids from flowing into the Park, and utilizes inadequate stormwater retention measures.

] 1.15

] 1.3

Less Parking, More Mass Transit: RDUA should invest in mass transit by considering having dedicated buses that bring people to and from the airport rather than investing in even more parking lots, contributing to further noise and air pollution in the Triangle.

] 1.3

Lisa Montone  
kennel.leaver\_0e@icloud.com  
Front  
Cary , North Carolina 27519

**From:** Lynn Clark  
**To:** RDUEA  
**Subject:** Protect Umstead State Park & East Coast Greenway. Don't harm our green space with Parking Lot Economy 3 Expansion  
**Date:** Sunday, February 5, 2023 6:50:55 PM

---

RDUEA Chris Babb, RDU EA,

Please do not expand RdUAA. We need to have more transparency with the process with the public, Need for wide buffers along Umstead State Park & East Coast Greenway, Consider alternative areas for development and have more mass transit vs parking lots. We need to keep trees and parks.

Lynn Clark

Lynn Clark  
alclark410@gmail.com  
1221 somers dr  
Morrisville, North Carolina 27560

} 1.4, 1.14  
} 5.4, 1.3  
} 1.16

**From:** [Erik Bennett](#)  
**To:** [RDUEA](#)  
**Subject:** Enough to Parking Lot. Don't Invest in Parking Lot Economy 3. Invest in Mass Transit  
**Date:** Tuesday, February 7, 2023 8:04:36 AM

---

RDUEA Chris Babb, RDU EA,

I urge RDUEA to consider other, more environmentally responsible measures to increase parking volume. The further deforestation surrounding Lot 3 is not only destructive and unsightly, it will cause irreversible damage to the neighboring wildlife habitat and watershed areas. Why not open unused Lots 4 and 5?

} 1.3

Erik Bennett  
ebvegas@hotmail.com  
113 Hunters Glen  
Morrisville, NC, North Carolina 27560

**From:** [JAMES HUNTER III](#)  
**To:** [RDUEA](#)  
**Subject:** Re: INTERNATIONAL AIRPORT RUNWAY LAYOUT  
**Date:** Wednesday, February 8, 2023 7:46:02 AM

---

On February 3, 2023, at 9:26 PM, JAMES HUNTER III <[faa2126841@gmail.com](mailto:faa2126841@gmail.com)> wrote:

>SEARCH DER: AIRPORT LAYOUT: INTERNATIONAL AIRPORT: RUNWAYS: IN THAT MATTER  
RUNWAY 9 IS THE STARTUP? RUNWAY 19 AND 29 ARE CC-1? CC-2 IS 39 AND 49? CC-3 IS  
CONCRETE? CC-4 IS RUNWAY 22 AND 26? CC-5 IS A TAR OVER WITH MARKINGS? CC-6 IS  
RUNWAY 32 AND 36?

} 1.2

**From:** STANLEY HANNEN  
**To:** RDUEA  
**Subject:** Protect Umstead State Park & East Coast Greenway. Don't harm our green space with Parking Lot Economy 3 Expansion  
**Date:** Wednesday, February 8, 2023 10:16:54 AM

---

] 1.3

RDUEA Chris Babb, RDU EA,

Put this money to use for a longer term solution like light rail. There's no reason to cut down more trees and create more impervious surface area.

] 3.1  
2.5

STANLEY HANNEN  
stanhannen@gmail.com  
513 Potomac Grove Place,  
Cary, North Carolina 27519

**From:** Minh Lu  
**To:** RDUEA  
**Subject:** Parking lot invites more noise and air pollution from cars. Consider alternatives to Parking Lot Economy 3 Expansion  
**Date:** Wednesday, February 8, 2023 4:23:02 PM

---

] 1.3

RDUEA Chris Babb, RDU EA,

Process should be transparent to the public: Tell the RDUAA that they need to be more transparent with their processes, and that the public deserves to be a part of the process in designing Economy 3 because their actions have a direct impact on the visitors to the Umstead State Park and the East Coast Greenway

] 1.14  
] 1.3

Two-Way Dialog with the Public: Ask the RDUAA to implement meaningful, two-way dialog on the design of all phases of the expansion of Park Economy 3.

] 1.3

Consider alternative areas for development: Tell the RDUAA that there are other areas to develop parking like on the other side of National Guard Drive (from 286) or on the other side of Aviation or even on the other side of the airport. Design and location options should be seriously evaluated with public input.

] 1.3

Need for wide buffers along Umstead State Park & East Coast Greenway: Let the RDUAA know that any parking expansion should include wide buffers along Umstead State Park and the East Coast Greenway (aka Old Reedy Creek Recreation Corridor) and be designed to protect irreplaceable natural community assets like The William B. Umstead State Park and the Old Reedy Creek recreation corridor.

] 5.4  
] 1.3

RDU is a major Urban Heat Island and has poor stormwater retention measures: RDU is already a huge heat island contributor to the area, which will be exacerbated by the conversion of green space to pavement. Their typical parking lot design excludes shade trees, does not prevent leaking vehicle fluids from flowing into the Park, and utilizes inadequate stormwater retention measures.

] 1.15  
] 1.3

Less Parking, More Mass Transit: RDUAA should invest in mass transit by considering having dedicated buses that bring people to and from the airport rather than investing in even more parking lots, contributing to further noise and air pollution in the Triangle.

] 1.3

Minh Lu  
minh.h.lu@gmail.com  
109 White Bloom Lane  
Cary, North Carolina 27519

**From:** [Peter Norwood](#)  
**To:** [RDUEA](#)  
**Subject:** RDU Airport's parking lot has poor stormwater management. Re-think the plans for Parking Lot Economy 3  
**Date:** Saturday, February 25, 2023 10:43:11 AM

---

] 1.3

RDUEA Chris Babb, RDU EA,

Hello! Please consider an area that will include wide buffers along Umstead State Park and the East Coast Greenway! Please consider other areas with less environmental impact.  
Thanks!

] 5.4  
] 4.3

Peter Norwood  
peter.norwood@pm.me  
129 chinabrook ct  
morrisville, North Carolina 27560

**From:** [Megan](#)  
**To:** [RDUEA](#)  
**Subject:** QUESTION related to new RDU runway  
**Date:** Friday, March 3, 2023 10:19:49 PM

---

Hello:

Can you please tell me if my home will have less noise or more noise due to new runway that will be constructed:  
130 Satterfield Circle, apex, Nc 27523

] 6.3

Sent from my iPhone



**From:** Mary Collins  
**To:** RDUEA  
**Subject:** Call for RDU action to preserve and protect valuable and irreplaceable forests so close to Umstead and Lake Crabtree Parks  
**Date:** Monday, March 6, 2023 11:48:30 AM

---

RDUEA Chris Babb,

Members of the RDUAA and others-

If you are receiving this and your first thought is not my jurisdiction or concern, please know that the area in question is a resource for those whom you serve, so I respectfully request that you read on and consider what you can do, thank you!

This is a personal, heartfelt request to preserve and protect all of the forested areas and creeks and waters that will be impacted by RDUAA. As more and more land is being cleared for development we must preserve forested areas for our quality of life, our air quality, and the unique recreation benefits so close to all of us. As a citizen of Cary, and user of the Reedy Creek Trail Head, Umstead State Park, and Lake Crabtree County park I am deeply concerned about loss of forested land, and the negative environmental impact to any of this area. I moved to NC in 1989 and recall being so impressed with the natural beauty of Umstead and the state. I married a native of NC who is an avid hiker in our area. So to me this is about preserving resources that cannot be replaced for generations to come.

7.8

I am requesting that you uphold and recognize that William B. Umstead State Park has protected status in a number of relevant ways, including:

Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina

Listing in the National Register of Historic Places, protecting its forested landscape and an historic property where the quiet, forested setting is recognized to be a key purpose and attribute

Protected under U.S. DOT Section 4(f) as a publicly owned part with State and National Significance

Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

5.2

The millions of dollars in mitigation funds should be used to protect Crabtree Creek and William B. Umstead State Park where water resources most impacted and not diverted to other areas.

9.1

The lands managed by the RDUAA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park. I request that mitigation for stream and wetland impacts be done on-site and/or adjacent land to William B. Umstead State Park.

9.1

Mitigation funds should be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

9.1

Sincerely,

Mary Collins  
211 Howland Ave.  
Cary, NC 27513

Mary Collins  
veganmaryc@gmail.com  
211 Howland Ave.  
Cary, North Carolina 27513

**From:** Pamela Olson  
**To:** RDUEA  
**Subject:** Draft Environmental Assessment  
**Date:** Thursday, March 9, 2023 8:23:18 AM

---

From the Umstead Coalition ....

We are pleased the new runway is farther away from William B. Umstead State Park. However, there will be thousands of feet of streams and wetlands impacted that will require millions of dollars (could be up to \$15million) in mitigation funds. These streams and wetland drain into Brier Creek, Crabtree Creek and then into William B. Umstead State Park. The draft EA calls for those millions of dollars in mitigation funds to be diverted off site to a mitigation bank – we believe that is wrong. Crabtree Creek and William B. Umstead State Park are water resources most impacted and their downstream protection should be the priority for these millions. Please ask the FAA to:

- **Require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.**
- **Request the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.**

} 9.1

Please ask that the protective status of William B. Umstead State Park be recognized (currently, the EA treats our Park similar to a soccer field, not the natural setting that we cherish as it's purpose), including the Park's:

- Listing in the National Register of Historic Places, protecting its forested landscape
- Protected under U.S. DOT Section 4(f) as a publicly owned part with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

From me .....

YES, we are pleased that the new runway is farther away from Umstead State Park.

YOU HAVE GOT TO BE KIDDING ME that the protective status of our park is similar to that given a soccer field!! This leaves me sputtering speechless. This is an opportunity for EA to recognize such a blazing mismatch of priorities and quietly correct it., thereby leaving a legacy of Thoughtful Appreciation for Life.

] 5.5

Let the Force be with YOU!

Pamela Olson

**From:** [Jean Spooner](#)  
**To:** [RDUEA](#)  
**Subject:** Require Runway Stream and Wetland Mitigation to help Crabtree Creek and William B. Umstead State Park  
**Date:** Saturday, March 11, 2023 5:13:32 PM

---

RDUEA Chris Babb,

This comment letter is directed towards FAA with cc to the RDUAA Board and Government Officials:

Please accept this comments on the draft Environmental Assessment (EA) for the new RDU Airport Runway. We are pleased the new runway is farther away from William B. Umstead State Park. The airport is built on environmental sensitive lands, so all projects with new footprints will have environmental challenges. There will be thousands of feet of streams and wetlands impacted that will require millions of dollars in mitigation funds. These streams and wetland impacted by the new runway drain into Brier Creek, Crabtree Creek and then into William B. Umstead State Park. The draft EA calls for those millions of dollars in mitigation funds to be diverted off site to a mitigation bank – we believe that is wrong. Crabtree Creek and William B. Umstead State Park are the water resources most impacted and their downstream protection should be the priority for these millions. Please:

} 9.1

- 1) Require that mitigation for stream and wetland impacts be used on-site and/or adjacent lands to William B. Umstead State Park to protect Haley's Branch, Crabtree Creek or other tributaries to Crabtree Creek.
- 2) Request RDUAA use the mitigation funds to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

} 9.1

Please ask that the protective status of William B. Umstead State Park be recognized (currently, the EA treats our Park similar to a recreation soccer field, not the natural setting that we cherish as it's purpose). The Park's historic and legal protections include and must be recognized in the EA (currently mistakenly absent), including:

- 1) William B. Umstead State Park's noise limits should be reflected as 55 DNL, not 65DNL as currently implied in the EA.
- 2) William B. Umstead State Park's listing in the National Register of Historic Places, protecting its forested landscape
- 3) William B. Umstead State Park is protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- 4) William B. Umstead State Park is an historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- 5) William B. Umstead State Park is protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina-our Park started as a National Park Service Park and transferred to the State of North Carolina with protective commitments from the State.

} 6.1  
5.2

6) William B. Umstead State Park is protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

└ 5.2

Jean Spooner  
jeanspooner@gmail.com  
2401 Trinity Farms Rd  
Raleigh, North Carolina 27607

**From:** Mary Lama  
**To:** RDUEA  
**Subject:** Protect our irreplaceable forested space next to Umstead State Park  
**Date:** Saturday, March 11, 2023 5:47:36 PM

---

RDUEA Chris Babb,

Do not divert those millions of dollars in mitigation funds off site, as Crabtree Creek and William B. Umstead State Park are water resources most impacted.  
Please ask that mitigation for stream and wetland impacts be done on-site and/or adjacent land to William B. Umstead State Park. This is appropriate because the lands managed by the RDUAA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park.

I ask that the protective status of William B. Umstead State Park be recognized, including:

Listing in the National Register of Historic Places, protecting its forested landscape

Protected under U.S. DOT Section 4(f) as a publically owned part with State and National Significance

An historic property where the quiet, forested setting is recognized to be a key purpose and attribute

Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina

Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

Mary Lama  
soilan.lama@gmail.com  
4017 Grimstead Lane  
Raleigh , North Carolina 27613

} 9.1  
} 5.2

**From:** Karen Michener  
**To:** RDUEA  
**Subject:** Umstead State Park's Protected by LWCF funds by National Park Service  
**Date:** Saturday, March 11, 2023 5:52:55 PM

---

RDUEA Chris Babb,

Crabtree Creek and William B. Umstead State Park are water resources most impacted and their downstream protection should be the priority for these millions. Please ask the FAA to:

] 9.44

Require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.

Request the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

] 9.1

Please ask that the protective status of William B. Umstead State Park be recognized (currently, the EA treats our Park similar to a soccer field, not the natural setting that we cherish as it's purpose), including the Park's:

Listing in the National Register of Historic Places, protecting its forested landscape Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance

An historic property where the quiet, forested setting is recognized to be a key purpose and attribute

Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina

Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

Please write to the RDU EA that:

] 5.2

Do not divert those millions of dollars in mitigation funds off site, as Crabtree Creek and William B. Umstead State Park are water resources most impacted.

Please ask that mitigation for stream and wetland impacts be done on-site and/or adjacent land to William B. Umstead State Park. This is appropriate because the lands managed by the RDUAA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park.

] 9.1

Please ask that the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

Please ask that the protective status of William B. Umstead State Park be recognized, including:

Listing in the National Register of Historic Places, protecting its forested landscape

] 5.2



Protected under U.S. DOT Section 4(f) as a publically owned part with State and National Significance

An historic property where the quiet, forested setting is recognized to be a key purpose and attribute

Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina

Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

Karen Michener  
morninglory1121@gmail.com  
1204 Lylerly Lane  
Cary, North Carolina 27511



S.2

**From:** Jacob Cline  
**To:** RDUEA  
**Subject:** The State Park Needs More Forest Buffer  
**Date:** Saturday, March 11, 2023 5:54:39 PM

---

RDUEA Chris Babb,

Do not divert those millions of dollars in mitigation funds off site, as Crabtree Creek and William B. Umstead State Park are water resources most impacted.

Mitigation for stream and wetland impacts should be done on-site and/or adjacent land to William B. Umstead State Park. This is appropriate because the lands managed by the RDUEA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park. Please use these funds to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders. William B. Umstead State Park should be recognized with the following:

- Listing in the National Register of Historic Places, protecting its forested landscape.
- Protected under U.S. DOT Section 4(f) as a publically owned part with State and National Significance.
- A historic property where the quiet, forested setting is recognized to be a key purpose and attribute.
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina.
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 9.1  
} 5.2

Thank you,

Jacob Cline

Jacob Cline  
clinejr13@gmail.com  
103 W Gerrell Ct  
Cary, North Carolina 27511

**From:** Riley Jones  
**To:** RDUEA  
**Subject:** Direct EA funds from new RDU runway to protect Umstead State Park  
**Date:** Saturday, March 11, 2023 6:44:20 PM

---

RDUEA Chris Babb,

Hello,

I am writing to voice my support for the new RDU runway location farther away from the borders of William B. Umstead State Park. This will benefit the park's wildlife and human visitors by reducing noise pollution. However, the EA currently does not direct the money set aside to mitigate the impact of the construction on local streams and waterways, which eventually drain into Umstead State Park. Instead, this money is currently set to go into an offsite mitigation bank. Because this construction will impact our local environment, including the State Park, the money and mitigation actions should be directed towards our local environment and fixing the issues it causes directly. For example, the mitigation funds could be used to improve and expand the forested buffer area arounds William B. Umstead State Park and other sensitive local waterways.

} 1.30  
} 6.5  
} 9.1

Thank you for your time,

Sincerely,  
Riley Jones

Riley Jones  
rileygrl15@gmail.com  
8905 Bradbury Ct  
Raleigh, North Carolina 27613

**From:** John Thomas  
**To:** RDUEA  
**Subject:** Do the mitigation of Crabtree Creek and Umstead State Park on-site  
**Date:** Saturday, March 11, 2023 6:59:49 PM

---

RDUEA Chris Babb,

If there's no avoiding the necessity for another runway, the very least all parties should agree to is that any mitigation funds should be for protection of Umstead Park and its environs, not earmarked for other sites. It should come as no surprise that Umstead Park is at least as important to a great many people as the airport is to many others and it deserves a fair portion of the many millions that will be spent on the new runway.

Thanks for doing the right thing.

John Thomas  
frog.pond@mindspring.com  
907 Tanglewood Drive  
Cary, North Carolina 27511

} 9.1

**From:** Paul Schlosser  
**To:** RDUEA  
**Subject:** Umstead State Park is a historic property, Respect it when considering development  
**Date:** Saturday, March 11, 2023 7:23:10 PM

---

RDUEA Chris Babb,

As a Cary, NC resident I have enjoyed Umstead State Park for many years. Please work to assure that mitigation funds from the RDU expansion are used to protect and benefit the streams in the park. In particular:

Do not divert those millions of dollars in mitigation funds off site, as Crabtree Creek and William B. Umstead State Park are water resources most impacted. Please ask that mitigation for stream and wetland impacts be done on-site and/or adjacent land to William B. Umstead State Park. This is appropriate because the lands managed by the RDUAA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park.

Mitigation funds should be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

Also, the protective status of William B. Umstead State Park be recognized, it's history, quality and features are a treasure that should not be squandered.

Sincerely,  
-Paul Schlosser

Paul Schlosser  
dr.paul.schlosser@gmail.com  
1200 Belhaven Rd  
Cary, North Carolina 27513

} 9.1  
} 5.2

**From:** Michael Stellpflug  
**To:** RDUEA  
**Subject:** Mitigation for streams and wetland impacts downstream of Umstead should be done on-site  
**Date:** Saturday, March 11, 2023 7:45:43 PM

---

] 9.1

RDUEA Chris Babb,

Don't it always seem to go,  
that you don't know what you've got until it's gone? They paved paradise and put up a parking  
lot. They took all the trees and put them in a tree museum, and they charged a dollar and a  
half to see them. Please don't make excuses to ruin paradise!

] 8.1

Michael Stellpflug  
dferkj@gmail.com  
117 white sands dr  
cary, North Carolina 27513

**From:** [fedexit@aol.com](mailto:fedexit@aol.com)  
**To:** [RDUJA](#)  
**Subject:** RDU Runway Environmental Assessment Public Comments  
**Date:** Saturday, March 11, 2023 7:53:09 PM

---

See below and ALL of the following! Protect William B. Umstead State Park!  
Thx, Marielle Marne & Steven Moore

] 5.3

Sent: Sat, Mar 11, 2023 3:30 pm  
Subject: Due Monday, March 13, 5pm, RDU Runway Environmental Assessment Public Comments

*Public Comments Due 5pm March 13, Runway Environmental Assessment*



*Dedicated to preserving the natural integrity of William B. Umstead State Park and the Richland Creek Corridor*

## **RDU Airport New Runway**

### **Draft Environmental Assessment**

**Public Comments due by  
March 13, 5pm**

that will require millions of dollars (could be up to \$15million) in mitigation funds. These streams and wetland drain into Brier Creek, Crabtree Creek and then into William B. Umstead State Park. **The draft EA calls for those millions of dollars in mitigation funds to be diverted off site to a mitigation bank – we believe that is wrong.** Crabtree Creek and William B. Umstead State Park are water resources most impacted and their downstream protection should be the priority for these millions. Please ask the FAA to:

- **Require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.**
- **Request the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.**

9.1

Please ask that the protective status of William B. Umstead State Park be recognized (currently, the EA treats our Park similar to a soccer field, not the natural setting that we cherish as it's purpose), including the Park's:

- Listing in the National Register of Historic Places, protecting its forested landscape
- Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

5.2

Written Public Comments will be accepted through 5pm March 13, 2023. Submit your comments to: [RDUEA@landrumbrown.com](mailto:RDUEA@landrumbrown.com) or through [Action Network](#) which will also send you comments to the RDUAA Board, EPA and elected officials.

**SUBMIT PUBLIC COMMENTS**

## Support the Umstead Coalition

The Umstead Coalition is a volunteer-led, 501(c)(3) nonprofit organization comprised of individual members and 16 partner conservation organizations. 100% of your donations go directly to help William B. Umstead



State Park and are tax deductible.

[DONATE](#)

This message has been sent to you by The Umstead Coalition  
If you no longer want to receive these emails, you can [unsubscribe](#) at any time  
1-919-852-2266 | [info@umsteadcoalition.org](mailto:info@umsteadcoalition.org)



**From:** Gabriella Cooper  
**To:** RDUEA  
**Subject:** Umstead State Park is a historic property. Please help protect it during development  
**Date:** Saturday, March 11, 2023 8:05:52 PM

---

RDUEA Chris Babb,

The EA treats the Umstead Park similar to a soccer field instead of the natural setting that it is.  
Please use your political standing to influence how this new runway is planned.

] 5.5

The protective status of William B. Umstead State Park should be recognized.

] 5.2

Please require the FAA mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.

Please require the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

} 9.1

Listing in the National Register of Historic Places, protecting its forested landscape  
Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance

An historic property where the quiet, forested setting is recognized to be a key purpose and attribute

Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina

Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service

} 5.2

Gabriella Cooper  
brie94@protonmail.com  
145 Synandra Ln  
Holly Springs, North Carolina 27540

**From:** Brie  
**To:** RDUEA  
**Subject:** Protect Umstead park please  
**Date:** Saturday, March 11, 2023 8:09:42 PM

---

The EA treats the Umstead Park similar to a soccer field instead of the natural setting that it is. Please use your political standing to influence how this new runway and other development is planned.

} 5.5

The protective status of William B. Umstead State Park should be recognized.

} 5.2

Please require the FAA mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.

} 9.1

Please require the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

Important actions can be taken to protect this treasure. Please help us protect the park in the following ways:

Listing in the National Register of Historic Places, protecting its forested landscape

Protect it under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance

An historic property where the quiet, forested setting is recognized to be a key purpose and attribute

Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina

Protect it by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service

} 5.2

Thank you for hearing my opinion. Have a good day.  
Gabriella

Sent from Proton Mail for iOS

**From:** Ryan Grace  
**To:** RDUEA  
**Subject:** Do the mitigation of Crabtree Creek and Umstead State Park on-site  
**Date:** Saturday, March 11, 2023 8:20:08 PM

---

RDUEA Chris Babb,

The people who use the park know what a gem we have, a magnificent natural oasis in the middle of a booming city. For the good of us all, please protect our park!

} 5.3

Ryan Grace  
ryan@weavermotorsportsinc.com  
1640 NW Maynard Road  
Cary, North Carolina 27513

**From:** Ken Pitser  
**To:** RDUEA  
**Subject:** Maintain more forested buffer for Umstead State Park in Your Development  
**Date:** Saturday, March 11, 2023 9:29:26 PM

---

RDUEA Chris Babb,

I've spent many hours hiking and biking in Umstead and triangle areas. Every year the undeveloped areas get smaller. This places more burden on the undeveloped lands to house the animal habitat, serve as storm water collection, retention and discharge and, lastly, to serve the public's need for outdoor recreation and contact with natural areas. Storm water runoff already overloads the beautiful creek beds adjacent to the airport and I have personally witnessed the erosion that occurs following heavy rains. With further development of the airport, it is appropriate to budget for mitigation of impacts to the undeveloped adjacent lands.

} 1.17  
} 9.45

I am a beneficiary of both the beautiful park lands adjacent to the airport as well as a traveler who uses the airport frequently. I believe the objective of modernizing and expanding the airport can be done with proper respect, restraint and mitigation of impacts to the adjacent undeveloped lands.

Please keep these responsibilities in mind when your time comes to rule on the subject matter.

Ken Pitser  
kpitser@gmail.com  
1016 Dozier way  
Cary , North Carolina 27518

**From:** [Peter Millsaps](#)  
**To:** [RDUEA](#)  
**Subject:** Don't let corporate greed further poison Umstead State Park  
**Date:** Sunday, March 12, 2023 7:40:16 AM

---

RDUEA Chris Babb,

Hello,

My name is Peter Millsaps and I grew up in North Raleigh and spent the majority of my childhood enjoying the trails of Umstead State Park. What a crucial resource we have in a thriving county.

I now live in Western NC but still come back to see family around the holidays. Every year I see how many more people are flocking to Umstead State park to escape the ever developing metropolis around them.

The park itself has enough potential human damage just from the foot traffic it receives on a weekly basis. Crabtree creek/Sycamore creek/ and Reedy Creek have had signs for 20 years saying don't eat the fish. Why would we allow RDU to further poison the one last MAJOR natural space in the triangle?

No, Umstead does not bring in money on paper like a fat check from RDU does. But, if you want to see generations of families to continue to call Wake County home then you have to protect where their kids will learn how to ride a bike and their grandkids will be pushed in a stroller.

Thank you for your time.

-Peter Millsaps

Peter Millsaps  
peter.millsaps@gmail.com  
801 Black Hill Road  
Bryson City , North Carolina 28713

5.3

**From:** [deann corum](#)  
**To:** RDUEA  
**Subject:** Umstead State Park is a historic property, Respect & protect it when considering development  
**Date:** Sunday, March 12, 2023 8:53:21 AM

---

RDUEA Chris Babb,

In regard to the RDU Airport 5L/23R Replacement Runway project, I'm pleased the new runway is farther away from William B. Umstead State Park. However, there will be thousands of feet of streams and wetlands impacted that will require millions of dollars (could be up to \$15million) in mitigation funds. These streams and wetland drain into Brier Creek, Crabtree Creek and then into William B. Umstead State Park.

The draft EA assessment calls for those millions of dollars in mitigation funds to be diverted off site to a mitigation bank. This is unacceptable. Please do not divert any mitigation funds off site, as Crabtree Creek and William B. Umstead State Park are water resources most impacted.

Also please require that mitigation for stream and wetland impact be done on-site and/or adjacent land to William B. Umstead State Park. This is necessary because the lands managed by the RDUEA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park.

Also, the protective status of William B. Umstead State Park must be recognized, including:

- Listing in the National Register of Historic Places, protecting its forested landscape
- Protected under U.S. DOT Section 4(f) as a publically owned park with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

I appreciate your full consideration of these comments.

D. Corum  
 Durham, NC

deann corum  
 decorum@gmail.com  
 2805 Herring Blvd

9.1

5.2

Durham, North Carolina 27704



**From:** Liam Norris  
**To:** RDUEA  
**Subject:** Mitigation for streams and wetland impacts downstream of Umstead should be done on-site  
**Date:** Sunday, March 12, 2023 9:52:10 AM

---

RDUEA Chris Babb,

Hello, I am fighting to preserve Umstead, and stop the airport from expanding into the wonderful woods of Umstead park. Umstead park is a beautiful park acting as an outlet for many different people. An opportunity to see the world as it is without the development humanity has given it. Umstead acts a centerpiece for those who enjoy exercise, many people will ride their bikes and go for runs through the beautiful forest. Many important species will be impacted by this airport expansion, and as someone who sees many import pieces to the ecosystem start to die, we may see a bigger change than face value. I love the Umstead woods and protecting it is extremely important. Such an import part to many lives. Please stop the airport extension. -LN

} 5.3  
] 1.4

Liam Norris  
liamnorris.nc@gmail.com  
2609 Clark Avenue  
Raleigh , North Carolina 27607

**From:** Sally Darney  
**To:** RDUEA  
**Subject:** Recognize Umstead State Park's Protective Status during your development  
**Date:** Sunday, March 12, 2023 10:39:00 AM

---

RDUEA Chris Babb,

3 generations of our family say "Let's go for a hike today in Umstead!" Please protect the park with bigger buffers as RDU expands. Use mitigation funds where they belong....in the Park like us! Insure that our grandkids can share the joys of nature with their kids for years to come.

} 5.3  
} 9.1

Sally Darney  
Sally.darney@gmail.com  
1128 Ashford Lane  
Cary, North Carolina 27511

**From:** [Lloyd \(Kampala/SO7\) Garcia](#)  
**To:** [RDUFA](#)  
**Subject:** Comments regarding RDU Proposed Runway EA  
**Date:** Sunday, March 12, 2023 10:44:08 AM

---

Dear Sir:

I support the Umstead Coalition's position regarding the proposed RDU runway EA. Specifically:

- The EA should require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.

- The mitigation funds should be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

Please maintain and support the protective status of William B. Umstead State Park.

Thank you, Lloyd E. Garcia, Raleigh, NC

} 9.1  
] 5.2

**From:** Jacob Wells  
**To:** RDUEA  
**Subject:** Recognize Umstead State Park's Protective Status during your development  
**Date:** Sunday, March 12, 2023 11:29:25 AM

---

RDUEA Chris Babb,

Do not divert those millions of dollars in mitigation funds off site, as Crabtree Creek and William B. Umstead State Park are water resources most impacted. Mitigation for stream and wetland impacts need to be done on-site or adjacent to land in William B. Umstead State Park. This would be appropriate because the lands managed by the RDUA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park. Umstead park is an historic property where the quiet, forested setting is recognized as its key purpose in an ever growing city. We need to protect this park at all costs and what you're doing is disrupting the nature and history that has been preserved for many years.

} 9.1  
} 5.2  
} 5.3

Jacob Wells  
jtwells357@gmail.com  
1211 Westview Ln  
Raleigh, North Carolina 27605

**From:** Elizabeth Slight  
**To:** RDUEA  
**Subject:** Comments on the Environmental Assessment for the Proposed Runway 5L/23R Replacement  
**Date:** Sunday, March 12, 2023 11:50:39 AM

---

RDUEA Chris Babb,

I am pleased the new runway will be farther away from William B. Umstead State Park. However, there will be thousands of feet of streams and wetlands impacted that will require millions of dollars (could be up to \$15million) in mitigation funds. These streams and wetland drain into Brier Creek, Crabtree Creek and then into William B. Umstead State Park. The draft EA calls for those millions of dollars in mitigation funds to be diverted off site to a mitigation bank -- I believe that is wrong. Crabtree Creek and William B. Umstead State Park are water resources most impacted and their downstream protection should be the priority for these millions.

} 9.1

I ask that the FAA:

\*Require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.

\*Request the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

} 9.1

I ask that the protective natural setting status of William B. Umstead State Park be recognized, including the Park's:

\*Listing in the National Register of Historic Places, protecting its forested landscape

\*Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance

\*An historic property where the quiet, forested setting is recognized to be a key purpose and attribute

\*Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina

\*Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

The bottom line is this: William B. Umstead State Park is a natural treasure to the triangle and EVERYTHING should be done to protect it.

} 5.3

Thank you.

Elizabeth Slight  
libbyslight@gmail.com  
405 Lochside Drive  
Cary, North Carolina 27518

**From:** [Louise Scott-Cole](#)  
**To:** [RDUEA](#)  
**Subject:** Umstead State Park is a historic property, Respect it when considering development  
**Date:** Sunday, March 12, 2023 12:27:34 PM

---

RDUEA Chris Babb,

Dear elected official,

Its exciting to see Raleigh grow and its regional services with it. While the drafted new runway avoids further imposing on Umstead State Park, there will be thousands of feet of streams and wetlands impacted. The lands managed by the RDUAA either drain directly or indirectly (through Brier and Crabtree Creek) into Umstead State Park. Now the EA calls for millions of dollars in mitigation funds but this support will be diverted off site. How does this make sense when the damages are done to our city, its woodlands and its green spaces?

} 9.1

The Environmental Assessment fails to recognize the Park's status on the National Register of Historic Places, its protection under DOT Section 4(f), the Reverter Clause and its LWCF funding. To treat it as this plan has is a disgrace to this region.

} 5.6

I ask that the mitigation funds be used here in Wake County- to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways. I also ask that you, the elected officials of our county recognize your interests in the people and places you serve. As Raleigh continues to grow, Umstead should never be a place people look back on fondly and say, "there use to be a such lovely state park in Raleigh, what a shame."

} 9.1

Best regards,

Louise Scott-Cole

Louise Scott-Cole  
louisescottcole@gmail.com  
1703 Hickory Overlook Trl Apt 202  
Raleigh, North Carolina 27607

**From:** David Collier  
**To:** RDUEA  
**Subject:** Draft Environmental Assessment for the proposed Runway 5L/23R Replacement Project  
**Date:** Sunday, March 12, 2023 12:28:57 PM

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RDUEA Chris Babb,

It's good that the new runway will be farther away from William B. Umstead State Park.

] 1.30

However, it's very bad that thousands of feet of streams and wetlands will be harmed, requiring millions of dollars in mitigation, and yet the draft EA calls for mitigation funds to be diverted off site.

] 9.1

Instead, mitigation funds should be used for stream and wetland impacts on-site and for land adjacent to William B. Umstead State Park because Crabtree Creek and William B. Umstead State Park are the water resources most impacted. The lands managed by the RDUEA drain either directly, or indirectly through Brier Creek and Crabtree Creek, into William B. Umstead State Park.

] 9.1

These mitigation funds should be used to increase the width of forested protective buffers necessary to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

] 9.1

The protective status of William B. Umstead State Park has been clearly established:

- 1.) Under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- 2.) By its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- 3.) By Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service

] 5.2

The park is also listed in the National Register of Historic Places for its forested landscape, and is considered an historic property where the quiet, forested setting is recognized to be a key purpose and attribute.

David Collier  
dcollier1223@gmail.com  
4185 English Garden Way  
Raleigh, North Carolina 27612

**From:** Dina Deaton  
**To:** RDUEA  
**Subject:** Regarding the "Draft Environmental Assessment for the proposed Runway 5L/23R Replacement Project":  
**Date:** Sunday, March 12, 2023 12:39:51 PM

---

RDUEA Chris Babb,

We are pleased the new runway is farther away from William B. Umstead State Park. However, there will be thousands of feet of streams and wetlands impacted that will require millions of dollars (could be up to \$15 million) in mitigation funds. These streams and wetlands drain into Brier Creek, Crabtree Creek and then into William B. Umstead State Park. The draft EA calls for those millions of dollars in mitigation funds to be diverted off site to a mitigation bank – we believe that is wrong. Crabtree Creek and William B. Umstead State Park are water resources most impacted and their downstream protection should be the priority for these millions.

] 1.30

] 9.1

Please ask the FAA to:

- Require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.
- Request the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park’s border and its sensitive drainage ways around the Park’s borders.

] 9.1

Please ask that the protective status of William B. Umstead State Park be recognized. Currently the EA treats Umstead State Park similar to a soccer field, not the natural setting that we cherish as its purpose.

The protective status of William B. Umstead State Park has been clearly established:

- Under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- By its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- By Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service

] 5.2

The park is also listed in the National Register of Historic Places for its forested landscape, and is considered an historic property where the quiet, forested setting is recognized to be a key purpose and attribute.

Respectfully,  
Dina L. Deaton  
4185 English Garden Way  
Raleigh, NC 27612



Dina Deaton  
dinadeaton@gmail.com  
4185 English Garden Way  
Raleigh, North Carolina 27612

**From:** Jade Dell  
**To:** RDUEA  
**Subject:** Umstead State Park Is a historic property, Respect it when considering development  
**Date:** Sunday, March 12, 2023 1:05:20 PM

---

RDUEA Chris Babb,

My letter got sent too quickly, so I will just say that protecting Umstead Park and Forest are important for human society to thrive, for our water to be kept clean, for animals to have habitat and for poisons to be kept out of streams and rivers. I am worried and do not want Umstead compromised. Give it utmost respect and put concrete, digging, building new luxury apartments down at the bottom of the list.

} 5.3

Sincerely, Jade Dell

Jade Dell  
jade.dell45@gmail.com  
709 McCulloch Street  
Raleigh, North Carolina 27603

**From:** Melissa Griffin  
**To:** RDUEA  
**Subject:** Recognize Umstead State Park's Protective Status during your development  
**Date:** Sunday, March 12, 2023 1:33:12 PM

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RDUEA Chris Babb,

As a resident of Wake County and someone who has enjoyed Umstead State Park for over fifty years, I'm devastated by your plans for development near this fragile ecosystem.

} 5.7

The draft EA calls for those millions of dollars in mitigation funds to be diverted off site to a mitigation bank. I believe that is wrong. Crabtree Creek and William B. Umstead State Park are the water resources most impacted and their downstream protection should be the priority for these millions. Do not divert those millions of dollars in mitigation funds off site

} 9.1

I request that mitigation for stream and wetland impacts be done on-site and/or adjacent land to William B. Umstead State Park. This is appropriate because the lands managed by the RDUEA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park.

} 9.1

In addition, mitigation funds should be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

I urge you to recognize the protective status of William B. Umstead State Park, including:

- Listing in the National Register of Historic Places, protecting its forested landscape
- Protected under U.S. DOT Section 4(f) as a publically owned part with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

Thank you for your consideration in this important matter.

Melissa Griffin  
theschool@mindspring.com  
7001 Orchard Knoll Dr.  
Apex, North Carolina 27539

**From:** [Waseca3](#)  
**To:** [RDUEA](#)  
**Subject:** protections for Umstead State Park - response on Draft Environmental Assessment for the proposed Runway 5L/23R Replacement Project  
**Date:** Sunday, March 12, 2023 1:37:31 PM

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RE: response on Draft Environmental Assessment for the proposed Runway 5L/23R Replacement Project

Hi -

We visit Umstead State Park on a weekly basis. We love the park and the oasis it provides. I am writing to ask the following to protect Umstead State Park:

1. That mitigation for stream and wetland impacts be done on-site and/or adjacent land to William B. Umstead State Park. This is appropriate because the lands managed by the RDUEA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park. ] 9.1
2. That mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders. ]
3. Most importantly - that the protective status of William B. Umstead State Park be recognize. ] 5.2

thank you!  
K Evenson  
Pittsboro, NC

**From:** Michael Allingham  
**To:** RDUEA  
**Subject:** Please prioritize Umstead park for mitigation funds related to RDU runway expansion  
**Date:** Sunday, March 12, 2023 2:04:53 PM

---

RDUEA Chris Babb,

Hello,

As a long-time RDU resident and user of Umstead State Park, I am writing to urge that the natural resource that is Umstead State Park be prioritized in the use of mitigation funds related to the RDU airport runway expansion. Specifically, I would as that you push to require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park and further that these funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

} 9.1

Umstead is a unique natural space in our rapidly expanding community and as a State Park which is also listed in the National Register of Historic Places, protecting its forested landscape, is further protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance, by the Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina as well as the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

As you know, the protection of Umstead has received considerable public support related to the Wake Stone proposed quarry site and I would ask that the same consideration be given to protecting this resource as it pertains to mitigating impacts from the RDU airport.

} 5.8

Thank you!

Mike

Michael Allingham  
mike.allingham@gmail.com  
5616 Loblolly Ct  
Durham, North Carolina 27705

**From:** [Genie Safriet](#)  
**To:** [RDUEA](#)  
**Subject:** Public comment on new RDU runway environmental assessment  
**Date:** Sunday, March 12, 2023 2:18:37 PM

---

Hello,

As a nearby neighbor and frequent user of William B. Umstead State Park, I have some requests related to the new RDU runway. Please require that mitigation payments for the impacts to streams and wetlands be used on land in or near the park. Please use these funds to protect the park's border and important drainage areas by increasing the width of the protective buffers around the park. The park is an environmentally sensitive area with historic significance and should be well protected so it can be enjoyed by current and future generations.

] 9.1  
] 5.2

Thank you for your time and consideration,  
Genie Safriet  
2412 Trinity Farms Road  
Raleigh, NC 27607

**From:** Genie Safriet  
**To:** RDUEA  
**Subject:** Public comment on new RDU runway environmental assessment  
**Date:** Sunday, March 12, 2023 2:20:35 PM

---

RDUEA Chris Babb,

Hello,

As a nearby neighbor and frequent user of William B. Umstead State Park, I have some requests related to the new RDU runway. Please require that mitigation payments for the impacts to streams and wetlands be used on land in or near the park. Please use these funds to protect the park's border and important drainage areas by increasing the width of the protective buffers around the park. The park is an environmentally sensitive area with historic significance and should be well protected so it can be enjoyed by current and future generations.

} 9.1  
} 5.2

Thank you.

Genie Safriet  
soaronfoot@mindspring.com  
2412 Trinity Farms Rd  
Raleigh, North Carolina 27607

**From:** Jon York  
**To:** RDUJA  
**Subject:** Umstead Park and RDU  
**Date:** Sunday, March 12, 2023 3:55:14 PM

---

I'm a supporter of both the park in the airport. Nice to see that it appears a compromise is being worked on but any mitigation for streams and wetland must be used adjacent to the park and to protect the parks borders.

] 9.1

The park needs to be listed in the national register of historic places and protected as a publicly owned park per its deed transfer in 1943 to the state of NC so can be preserved for future generations. Thank you!

] 5.9

Sent from my iPhone



**From:** John Johnstone  
**To:** RDUEA  
**Subject:** Recognize Umstead State Park's Protective Status during your development  
**Date:** Sunday, March 12, 2023 3:59:15 PM

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RDUEA Chris Babb,

Please do not divert millions of dollars in mitigation funds off site, as Crabtree Creek and William B. Umstead State Park are water resources most impacted. Mitigation for stream and wetland impacts should be done on-site and/or adjacent land to William B. Umstead State Park. This is appropriate because the lands managed by the RDUEA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead Park. Mitigation funds should be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

} 9.1

The protective status of William B. Umstead State Park be recognized, including:

- 1.) Listing in the National Register of Historic Places, protecting its forested landscape
- 2.) Protected under U.S. DOT Section 4(f) as a publically owned part with State and National Significance
- 3.) An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- 4.) Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- 5.) Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

Thank you for your attention to this issue

John Johnstone  
514 Pace St  
Raleigh, NC

John Johnstone  
jmj3504@gmail.com  
514 Pace St  
Raleigh , North Carolina 27604

**From:** Jane Ferdon  
**To:** RDUEA  
**Subject:** Recognize that lands managed by RDUAA drains into Umstead State Park  
**Date:** Sunday, March 12, 2023 4:19:43 PM

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RDUEA Chris Babb,

Dear Sirs;

Do you remember the Joni Mitchell song BIG YELLOW TAXI? The lyrics are "Don't it always seem to be that you don't know what you've got til it's lost. You find paradise & you put in a parking lot."

Well, I can't say it any better than that & it's so true all over our beautiful Triangle area. Good bye trees, hello concrete. Please listen to your constituents & the little people instead of the titans of growth & development. We need to preserve Umstead Park for ourselves & our children & their children. No amount of "mitigation" will bring back the quiet, the pristine water, the forest trees, and the diverse wildlife that will be destroyed by mining pits, runways, and parking decks. Will our grandchildren have to go to museums to experience what once was & what we squandered & then lost?

Imagine New York City without Central Park. With all the explosive growth in every direction, Umstead Park is that same kind of green oasis so many enjoy & hold dear. It is a treasure worth preserving; its value is far beyond any financial calculation. Please protect our park.

Sincerely,

Ben & Jane Ferdon

Jane Ferdon  
janethurlowferdon@gmail.com  
6109 Lost Valley Rd  
Raleigh, North Carolina 27612

} 5.3

**From:** Lyle Adley-Warrick  
**To:** RDUEA  
**Subject:** Recognize Umstead State Park's Protective Status during your development  
**Date:** Sunday, March 12, 2023 4:22:30 PM

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RDUEA Chris Babb,

The proposed runway 5L/23R will require millions of dollars in mitigation funds to protect the Brier Creek and Crabtree Creek watersheds which drain into Umstead Park. Please use whatever influence you have to require that those fund be used on-site, not diverted into a mitigation bank.

} 9.1

Lyle Adley-Warrick  
adleywarrick.l@gmail.com  
128 Ellington Oaks Court  
Raleigh, NC, North Carolina 27603

**From:** [Nick Borisow](#)  
**To:** [RDUEA](#)  
**Subject:** Comments to RDU Runway Extension  
**Date:** Sunday, March 12, 2023 8:06:14 PM

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Dear officials,

As a frequent business and leisure traveler, do not approve this extension of the runway. The impact on the environment in which I live is much more valuable than the need to fly directly to foreign destinations. If I had interest in compromising my quality of life for easier travel, I would move to the cities where this is possible. This request is rooted in greed, not because the traveling community needs it.

] 1.4  
] 3.8

In the spirit of compromising, I would suggest that nothing, and I mean nothing, be approved for RDU, until there is a willingness to approve increased public transportation, EV charging and other environmental stewardship elements in any plan moving forward. The willingness to sacrifice our natural environment and sacrifices to sustainable growth astound me.

] 2.1

Stop these expansion approvals until RDU shows a commitment to sustainable practices. If RDU wants to be world class, start acting like an airport authority with commitments for sustainability, as well as, growth.

Thank you for your strong consideration to preserve our environment, wetlands and life-sustaining watersheds.

Thank you,

Nick Borisow  
Cary, NC

**From:** Lisa Feutz  
**To:** RDUEA  
**Subject:** Umstead State Park is a historic property, Respect it when considering development  
**Date:** Monday, March 13, 2023 7:14:31 AM

---

RDUEA Chris Babb,

Please PLEASE preserve the beauty of Umstead and to allow the woodland animals to continue to live there without disruption! Please use the mitigation funds for the park that we all love so much. Umstead park is a historic site to be enjoyed for generations. Please don't take that away.

} 5.3  
9.1  
5.2

Lisa Feutz  
lisafeutz@gmail.com  
5316 Back Sail Court  
Raleigh, North Carolina 27613

**From:** [Natalie Lew](#)  
**To:** [RDUEA](#)  
**Subject:** Recognize that RDUA managed lands drain into Umstead State Park / offset stream mitigation penalty by transferring land to State and/or Wake County  
**Date:** Monday, March 13, 2023 10:14:00 AM

---

RDUEA Chris Babb,

My apologies, but there is some redundancy within this message. I do not have time due to work to clean it up.

I write this public comment as a very frequent flyer (Million Miler with AA, Lifetime Diamond with Hilton), a neighbor (living within 5 miles of the Airport), and a local (having spent most of my life here). Given my extensive travels, it is easy to recognize not only the importance of having a good local airport, but it is also easy to recognize that we have a unique and irreplaceable asset adjacent to our Airport – that being The William B. Umstead State Park and the recreation corridor that runs parallel to the Airport. The two can exist harmoniously as long as the Airport respects its neighbor and the public.

I am grateful that the proposed replacement runway is farther away from William B. Umstead State Park. But I am very concerned about several things including how stream mitigation money is spent and staff understanding of the uniqueness of this situation (that being the Airport neighboring a huge public recreation corridor).

} 1.0  
 } 2.1  
 } 5.10

You may be saying that this EA has nothing to do with the land between National Guard Drive and Umstead State Park or the land at Lake Crabtree County Park as it is on the total opposite side of the Airport from the new runway. But that is not true for at least two reasons:

- All water that drains from the area of the proposed new runway ultimately drains into Lake Crabtree and into Umstead State Park. So, what is done on the far side of the Airport from the Park does affect the Park.
- The RDUA constantly complains about the cost of the expansion. There is a very easy way to offset that cost – transfer management control of the land is way, way, way remote to the Airport but an intimate part of a highly used recreation corridor to Wake County (i.e., Lake Crabtree County Park) and the State (i.e., Odd Fellows, 286 East, and the buffer for Haley’s Branch Creek consisting of part of 286 West and 286 North). The Airport will not in any way be harmed, financially or physically, by returning land that encroaches into the Park to the control of the State.

} 9.46

} 2.6

I attended the poster presentation and am concerned about staff knowledge of the local area and the important history. Staff, whether contracted or direct hire, needs to know the local area and the important history. Staff cannot make good decisions if they are not familiar with the area or the history, especially land management control.

} 5.10

Staff at the poster presentation told me that none of the waters in the area of the proposed runway drain into Umstead State Park. That is false. These waters drain into the Brier Creek

} 5.11

Reservoir and Brier Creek which then drain into Umstead State Park via Lake Crabtree.

} 5.11

Staff seem to consider Umstead State Park like an athletic field, not the natural setting that we cherish. Staff made comments to the effect of "Umstead is just a State Park and has no federal protection." This is not accurate. The protected status of William B. Umstead State Park needs to be recognized AND considered. Currently Umstead State Park is:

} 5.5  
} 5.6

- Listed in the National Register of Historic Places, protecting its forested landscape
- Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

Please also be reminded that Lake Crabtree, Brier Creek Reservoir, Brier Creek, Haley's Branch Creek, and Crabtree Creek are part of the tax-payer funded Crabtree Creek Watershed Flood Control program that started in the 1950's. The dams to create these lakes were planned before the Airport started their expansion efforts. A secondary goal of the flood control program was to provide recreation at the flood control structures as a way to give the public more benefit for their tax dollars. The public has no access to Brier Creek Reservoir, so we must be allowed to keep access to LCCP in full as we know it today (including the land). The Airport must not negatively affect or take away access to publicly funded and valued recreation areas, especially as these areas are remote to the Airport.

} 9.47

} 2.2

I and everyone I know want a good airport, but, we do not want this at the expense of the recreation corridor that runs PARALLEL to the Airport and is formed by Umstead State Park, Lake Crabtree County Park, the lands in between these areas and the artery greenways that pass through this area. I have done extensive research on the land and can say for certain that it was the past RDUAA that encroached into the Park area. Not the other way around. The RDUAA of the past used their political positions, political connections, access to federal money, and connections to developers to take management control of land that has been on the Park acquisition list since the 1930's in order to block both the State's desire to expand the Park border to I-40 (parallel to the Airport) and Wake County's plans to create a permanent Park at Lake Crabtree (Site #23 in the publicly funded flood control program). One government official orchestrated the taking of land adjacent to Umstead and then went to work for the RDUAA to orchestrate the use of the land and keep it from being returned to the State and County. The past RDUAA "aggressively" went after land adjacent to the Park even though the Airport expanded on the total opposite side. The past RDUAA called those that fought to protect the Park "fanatical savers of the Park." Per historical letters and RDUAA meeting minutes, the past RDUAA and their colleagues attempted to hide their intentions to "take" all land between the Park and the Airport even though some of it was best suited for Park use. Their colleagues wrote letters ending with statements like "This letter will self-destruct in 30

} 2.7

} 1.18

seconds."

>>>>>>>>>>

The streams and wetlands in the area of the new runway will be covered up, diverted, or otherwise destroyed. To offset this destruction, the RDUA will be required to mitigate this issue and deposit millions of dollars in mitigation funds (money) into a mitigation bank to be distributed to protect wetlands and streams. The draft EA calls for these millions of dollars in mitigation funds to be diverted off site, away from this area. The money could be diverted to the coast or to the mountains or anywhere other than the neighboring Umstead State Park. This is wrong. The money must stay local and be used to offset impacts to the Airport's biggest neighbor, Umstead State Park, and to the neighboring, publicly funded Crabtree Creek watershed features – including Lake Crabtree and Lake Crabtree County Park.

9.1

The streams and wetlands affected by the new runway drain into Brier Creek, Brier Creek Reservoir, Lake Crabtree, Crabtree Creek and then into William B. Umstead State Park. Thus, downstream protection should be the priority for the millions of dollars in mitigation funds.

9.1

RDU could offset the millions of dollars of stream mitigation that they will for certain incur by releasing land such as Odd Fellows, Lake Crabtree County Park, 286 East, and the buffer area for 286 West to the NC State Park System and/or Wake County.

9.6

The FAA must:

- Require that mitigation funds for stream and wetland impacts be used on-site (at the Airport) and/or on land adjacent to William B. Umstead State Park (e.g., Lake Crabtree County Park, 286 East, 286 West, 286 North, Haley's Branch, Odd Fellows).
- Require the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders (e.g., This could include offsetting the cost of the penalty incurred by RDU by releasing land to the NC State Park System (286 East and part of 286 West and North to serve as buffer for Haley's Branch Creek and Umstead) and to Wake County (Lake Crabtree County Park).

9.1  
9.1  
9.6

Natalie Lew  
nlew@mindspring.com  
PO Box 80035  
Raleigh, North Carolina 27623



**From:** [nlew@mindspring.com](mailto:nlew@mindspring.com)  
**To:** [RDUEA; PublicComment@rdu.com](mailto:RDUEA; PublicComment@rdu.com)  
**Cc:** [contactgov@nc.gov](mailto:contactgov@nc.gov); "Wiley Nickel"  
**Subject:** Recognize that Umstead State Park has federal protections / offset stream mitigation penalty by transferring land that encroaches into the recreation corridor to the State and/or Wake County  
**Date:** Monday, March 13, 2023 10:18:56 AM

My apologies, but there is some redundancy within this message. I do not have time due to work to clean it up.

I write this public comment as a very frequent flyer (Million Miler with AA, Lifetime Diamond with Hilton), a neighbor (living within 5 miles of the Airport), and a local (having spent most of my life here). Given my extensive travels, it is easy to recognize not only the importance of having a good local airport, but it is also easy to recognize that we have a unique and irreplaceable asset adjacent to our Airport – that being The William B. Umstead State Park and the recreation corridor that runs parallel to the Airport. The two can exist harmoniously as long as the Airport respects its neighbor and the public.

I am grateful that the proposed replacement runway is farther away from William B. Umstead State Park. But I am very concerned about several things including how stream mitigation money is spent and staff understanding of the uniqueness of this situation (that being the Airport neighboring a huge public recreation corridor).

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You may be saying that this EA has nothing to do with the land between National Guard Drive and Umstead State Park or the land at Lake Crabtree County Park as it is on the total opposite side of the Airport from the new runway. But that is not true for at least two reasons:

- All water that drains from the area of the proposed new runway ultimately drains into Lake Crabtree and into Umstead State Park. So, what is done on the far side of the Airport from the Park does affect the Park.
- The RDUEA constantly complains about the cost of the expansion. There is a very easy way to offset that cost – transfer management control of the land is way, way, way remote to the Airport but an intimate part of a highly used recreation corridor to Wake County (i.e., Lake Crabtree County Park) and the State (i.e., Odd Fellows, 286 East, and the buffer for Haley’s Branch Creek consisting of part of 286 West and 286 North). The Airport will not in any way be harmed, financially or physically, by returning land that encroaches into the Park to the control of the State.

} 9.46  
} 2.6

I attended the poster presentation and am concerned about staff knowledge of the local area and the important history. Staff, whether contracted or direct hire, needs to know the local area and the important history. Staff cannot make good decisions if they are not familiar with the area or the history, especially land management control.

} 5.10

Staff at the poster presentation told me that none of the waters in the area of the proposed runway drain into Umstead State Park. That is false. These waters drain into the Brier Creek Reservoir and Brier Creek which then drain into Umstead State Park via Lake Crabtree.

} 5.11

Staff seem to consider Umstead State Park like an athletic field, not the natural setting that we cherish. Staff made comments to the effect of “Umstead is just a State Park and has no federal protection.” This is not accurate. The protected status of William B. Umstead State Park needs to be recognized AND considered. Currently Umstead State Park is:

} 5.5  
} 5.6

- Listed in the National Register of Historic Places, protecting its forested landscape
- Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina

} 5.2

- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

Please also be reminded that Lake Crabtree, Brier Creek Reservoir, Brier Creek, Haley's Branch Creek, and Crabtree Creek are part of the tax-payer funded Crabtree Creek Watershed Flood Control program that started in the 1950's. The dams to create these lakes were planned before the Airport started their expansion efforts. A secondary goal of the flood control program was to provide recreation at the flood control structures as a way to give the public more benefit for their tax dollars. The public has no access to Brier Creek Reservoir, so we must be allowed to keep access to LCCP in full as we know it today (including the land). The Airport must not negatively affect or take away access to publicly funded and valued recreation areas, especially as these areas are remote to the Airport.

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I and everyone I know want a good airport, but, we do not want this at the expense of the recreation corridor that runs PARALLEL to the Airport and is formed by Umstead State Park, Lake Crabtree County Park, the lands in between these areas and the artery greenways that pass through this area. I have done extensive research on the land and can say for certain that it was the past RDUAA that encroached into the Park area. Not the other way around. The RDUAA of the past used their political positions, political connections, access to federal money, and connections to developers to take management control of land that has been on the Park acquisition list since the 1930's in order to block both the State's desire to expand the Park border to I-40 (parallel to the Airport) and Wake County's plans to create a permanent Park at Lake Crabtree (Site #23 in the publicly funded flood control program). One government official orchestrated the taking of land adjacent to Umstead and then went to work for the RDUAA to orchestrate the use of the land and keep it from being returned to the State and County. The past RDUAA "aggressively" went after land adjacent to the Park even though the Airport expanded on the total opposite side. The past RDUAA called those that fought to protect the Park "fanatical savers of the Park." Per historical letters and RDUAA meeting minutes, the past RDUAA and their colleagues attempted to hide their intentions to "take" all land between the Park and the Airport even though some of it was best suited for Park use. Their colleagues wrote letters ending with statements like "This letter will self-destruct in 30 seconds."

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>>>>>>>>>>>

The streams and wetlands in the area of the new runway will be covered up, diverted, or otherwise destroyed. To offset this destruction, the RDUAA will be required to mitigate this issue and deposit *millions of dollars* in mitigation funds (money) into a mitigation bank to be distributed to protect wetlands and streams. **The draft EA calls for these millions of dollars in mitigation funds to be diverted off site, away from this area. The money could be diverted to the coast or to the mountains or anywhere other than the neighboring Umstead State Park. This is wrong. The money must stay local and be used to offset impacts to the Airport's biggest neighbor, Umstead State Park, and to the neighboring, publicly funded Crabtree Creek watershed features – including Lake Crabtree and Lake Crabtree County Park.**

} 9.1

The streams and wetlands affected by the new runway drain into Brier Creek, Brier Creek Reservoir, Lake Crabtree, Crabtree Creek and then into William B. Umstead State Park. *Thus, downstream protection should be the priority for the millions of dollars in mitigation funds.*

} 9.1

RDU could offset the millions of dollars of stream mitigation that they will for certain incur by releasing land such as Odd Fellows, Lake Crabtree County Park, 286 East, and the buffer area for 286 West to the NC State Park System and/or Wake County.

} 9.6

The FAA must:

- Require that mitigation funds for stream and wetland impacts be used on-site (at the Airport) and/or on land adjacent to William B. Umstead State Park (e.g., Lake Crabtree County Park, 286 East, 286 West, 286 North,

} 9.1

Haley's Branch, Odd Fellows).

- Require the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders (e.g., This could include offsetting the cost of the penalty incurred by RDU by releasing land to the NC State Park System (286 East and part of 286 West and North to serve as buffer for Haley's Branch Creek and Umstead) and to Wake County (Lake Crabtree County Park).

} 2.6

**From:** Pamela Missimer  
**To:** RDUEA  
**Subject:** RDU airport expansion and Umstead Park  
**Date:** Monday, March 13, 2023 10:34:46 AM

Gentlepersons,

The proposed replacement runway is west of, and will be longer than, the current long runway and results in a significant rerouting of Lumley Drive. I am pleased the new runway is farther away from William B. Umstead State Park. However, there will be thousands of feet of streams and wetlands impacted.

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Basically, the streams and wetlands in that area will be covered up, diverted, or otherwise destroyed. To offset this destruction, the RDUAA will be required to mitigate this issue by depositing millions of dollars (could be up to \$15million) in mitigation funds into a special bank that distributes money to be used to protect wetlands, and streams (mitigation bank).

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**The draft Environmental Assessment (EA) calls for these millions of dollars in mitigation funds to be diverted off site. The money could be diverted to the coast or to the mountains or anywhere other than the neighboring Umstead State Park. I think that is wrong. The money must stay local and be used to offset impacts to the Airport's biggest neighbor – a publicly owned State Park!**

9.1

The streams and wetlands affected by the new runway drain into Brier Creek, Brier Creek Reservoir, Lake Crabtree, Crabtree Creek and then into William B. Umstead State Park. Thus, downstream protection should be the priority for the millions of dollars in mitigation funds. Also, RDU could offset these millions of dollars that they will for certain incur by releasing land such as Odd Fellows, Lake Crabtree County Park, 286 East, and the buffer area for 286 West to the NC State Park System and/or Wake County.

9.6

Please do the following:

- **Require that the mitigation funds for stream and wetland impacts be used on-site (at the Airport) and/or on land adjacent to William B. Umstead State Park (e.g., Lake Crabtree County Park, 286 East, 286 West, 286 North, Haley's Branch, Odd Fellows).**
- **Require that the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders (e.g., This could include offsetting the cost of the penalty incurred by RDU by releasing land to the NC State Park System and/or Wake County. This includes Odd Fellows, Lake Crabtree County Park, 286 East, and the buffer area for 286 West to the NC State Park System and/or Wake County.)**

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9.6

I respectfully ask that the EA, RDU, etc. recognize the protected status of William B. Umstead State Park. Currently, the EA treats Umstead State Park similar to a soccer field, not the natural setting that we cherish. Umstead State Park is:

- Listed in the National Register of Historic Places, protecting its forested landscape
- Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

5.2

Thank you for your consideration.

Sincerely,  
Pam Missimer

**From:** [Henry Ward](#)  
**To:** [RDUEA](#)  
**Subject:** RDU/Umstead public comment  
**Date:** Monday, March 13, 2023 10:49:37 AM

---

To whom it may concern:

As a Wake County resident, I am deeply invested in the future of our crown jewel, the William B. Umstead State Park. As such, I respectfully ask the FAA to consider the following:

- Require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park instead of diverted to an off site mitigation bank.
- Request the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

} 9.1

I also ask that the protective status of William B. Umstead State Park be recognized, including the Park's:

- Listing in the National Register of Historic Places, protecting its forested landscape
- Protection under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- Recognition as a historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protection by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protection by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

The Park is one of our region's most precious resources, and the public wants to protect the Park's future. As such, I ask that you consider these comments.

Henry Ward  
 Wake County resident

**From:** [Gerald Surh](#)  
**To:** [RDUEA](#)  
**Subject:** Do not divert the mitigation funds off-site from the state park  
**Date:** Monday, March 13, 2023 11:42:52 AM

---

RDUEA Chris Babb,

As a longstanding member of the Triangle's community of environmentalists and regular visitors to Umstead State Park, I urge the park's preservation as stipulated by the Umstead Coalition.

Gerald Surh  
surh@ncsu.edu

Gerald Surh  
surh@ncsu.edu  
195 Viburnum Way  
Carrboro, North Carolina 27510

} 5.2  
9.1

**From:** [SUSAN CARL](#)  
**To:** [RDUEA](#)  
**Subject:** Mitigation banking for new RDU runway  
**Date:** Monday, March 13, 2023 11:55:43 AM

---

RDUEA Chris Babb,

I am against using a mitigation bank to compensate for the wetland loss due to the new runway location, when sites much closer to the airport, such as Umstead State Park, could be targeted for wetland enhancement activities. Thank you.

] 9.1

SUSAN CARL  
scarl2@earthlink.net  
1406 Princess Anne Rd  
Raleigh, North Carolina 27607

**From:** [Jean Spooner](#)  
**To:** [RDUFA](#)  
**Cc:** [Dupree, Tommy \(FAA\)](#); [white.douglas@epa.gov](#); [renee.oleghill-earley@ncdcr.gov](#); [ramona.bartos@ncdcr.gov](#); [Wilson, Reid](#); [Strong, Brian](#); [Letchworth, Scott](#); [dickie.thompson@rdu.com](#); [Nina.szlosberg-Landis@rdu.com](#); [Tammie.Hall@rdu.com](#); [Yesenia.Polanco@rdu.com](#); [david.kushner@rdu.com](#); [ellis.hankins@rdu.com](#); [david.morgan@rdu.com](#); [p.hannah@rdu.com](#)  
**Subject:** RDU Runway EA Public Comments  
**Date:** Monday, March 13, 2023 1:06:40 PM  
**Attachments:** [Umstead Coalition Public Comments Draft Runway EA, March 13, 2023, reduced file sizeb.pdf](#)

**CAUTION:** This email attachment originated from a third party. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: Raleigh-Durham International Airport Draft Environmental Assessment Proposed Runway 5L/23R Replacement Project

From: Dr. Jean Spooner, Chair, The Umstead Coalition (cell 919-602-0049)

Please accept these comments on the draft Environmental Assessment (EA) for the RDU Airport replacement runway, 5L/23R. We are pleased the new runway is farther away from William B. Umstead State Park. The airport is on environmental sensitive lands. The reality is that all airport projects with new footprints will have environmental challenges which should be first avoided, then minimized, and if cannot be avoided or minimized, then mitigated.

} 1.30  
 } 1.19

The final EA should be corrected to:

- Include the 55 DNL noise protective status of William B. Umstead State Park (not the 65 DNL reflected in the draft EA)
- Require the stream and wetland mitigation funds be used on RDU Airport property and/or adjacent lands to William B. Umstead State Park to protect Haley's Branch, Crabtree Creek or other tributaries to Crabtree Creek, as these are the water resources directly impacted
- List the Cumulative Impacts to William B. Umstead State Park

} 6.1  
 } 9.1  
 } 15.2

See attached for detailed comments.

--  
 Thanks for supporting William B. Umstead State Park!

Dr. Jean Spooner, Chair  
 The Umstead Coalition  
 PO Box 10654  
 Raleigh, NC 27605  
 cell 919-602-0049



Virus-free [www.avast.com](http://www.avast.com)





**The Umstead Coalition**

**P.O. Box 10654  
Raleigh, NC 27605-0654  
(919) 852-2268**

<http://umsteadcoalition.org>

<facebook.com/umsteadcoalition>

<meetup.com/umsteadcoalition>

*B.W. Wells Association  
Capital Group Sierra Club  
Eno River Association  
Friends of State Parks  
Headwaters Group Sierra Club*

*New Hope Audubon Society  
Neuse Riverkeeper Foundation  
NC Herpetological Society  
NC League Conservation Voters Foundation  
NC Wildlife Federation*

*NC Native Plant Society  
Orange-Chatham Group Sierra Club  
Raleigh Ski and Outing Club, Inc.  
Rockingham Naturalist's Club  
Friends of Jockey's Ridge  
Wake Audubon Society*

March 13, 2023

MEMORANDUM

To: Chris Babb  
Landrum & Brown  
4445 Lake Forest Drive, Suite 700  
Cincinnati, OH 45242  
RDUEA@landrumbrown.com

Re: Raleigh-Durham International Airport Draft Environmental Assessment Proposed Runway 5L/23R Replacement Project

From: Dr. Jean Spooner, Chair, The Umstead Coalition (cell 919-602-0049)

Please accept these comments on the draft Environmental Assessment (EA) for the RDU Airport replacement runway, 5L/23R. We are pleased the new runway is farther away from William B. Umstead State Park. The airport is on environmental sensitive lands. The reality is that all airport projects with new footprints will have environmental challenges which should be first avoided, then minimized, and if cannot be avoided or minimized, then mitigated.

1.30  
1.19

The final EA should be corrected to:

- Include the 55 DNL noise protective status of William B. Umstead State Park (not the 65 DNL reflected in the draft EA) ] 6.1
- Require the stream and wetland mitigation funds be used on RDU Airport property and/or adjacent lands to William B. Umstead State Park to protect Haley's Branch, Crabtree Creek or other tributaries to Crabtree Creek, as these are the water resources directly impacted ] 2.1
- List the Cumulative Impacts to William B. Umstead State Park ] 15.2

**William B. Umstead State Park's 55 DNL Aircraft Noise Protective Status**

The 55 DNL noise contours in the vicinity of William B. Umstead State Park must be shown in all the noise contour figures. Exhibit 4-1 through 9-3 in the EA need to be amended to show William B. Umstead State Park as a 55 DLN noise limit from airport noise. Currently, our protected Park is misrepresented as being equivalent to an outdoor sports arena and soccer fields or 65 DNL-- which is wrong and in violation of the

6.1

FAA Order 1050.1E National Policy: Environmental Impacts: Policies and Procedures (for compliance with the National Environmental Policy Act (NEPA)).

The FAA NEPA compliance guidance (FAA 1050.1E) gives special consideration to the evaluation of the significance of noise impacts on **noise-sensitive areas** within national parks, national wildlife refuges and **historic sites** and states that 14 CFR Part 150 Land Use Compatibility Guidelines and the DNL 65 dB threshold of significance for noise do not adequately address the effects of noise on visitors to areas where other noise is low and a **quiet setting is a generally recognized purpose and attribute**.

6.1

William B. Umstead State Park began as a National Park Service (NPS), Department of the Interior in 1934. The Federal Park was called the Crabtree Creek Recreational and Demonstration Project, aimed to restore or redevelop sub-marginal agricultural land. William B. Umstead State Park was established in 1934 as a National Park by the National Park Service, US Department of Interior. The Park was sold to the State of North Carolina in 1943 for one dollar, with the National Park Service (NPS) making **preservation a condition of the sale (Deed Restriction from the National Park Service)**.

5.12

Users of William B. Umstead State Park have an expectation of a quiet natural forest recreational site. In fact, most of the William B. Umstead State Park have noise levels of 40-45dB. The exceptions are Park areas adjacent to the airport, I40 and US70. Additional noise from RDU Airport are not allowed, as that constitutes a "taking." See attached for some of the protections of William B. Umstead State including **National Register of Historic Places (NRHP), Federal Land and Water Conservation (LWCF, Section 6(f)), 1970 Everglades agreement, and Section 4(f)**. These protections need to be listed and recognized in the EA.

5.13

**Stream and Wetland Mitigation Funds should be use to Protect Crabtree Creek**

Extreme care must be used to prevent any sediment from leaving the Ward Transformer Site. All the drainage from this site ends up in Crabtree Creek and William B. Umstead State Park. Currently, the entire Crabtree Creek within William B. Umstead State Park is posted for PCB fish contamination from the Ward Transformer site.

10.13

There will be thousands of feet of streams and wetlands impacted that will require millions of dollars in mitigation funds. RDUAA will be required to mitigate the approximate 1.56 acres jurisdictional wetlands, 2.53 acres wetlands protected under Executive Order 11990, 8,780 linear feet of streams, and 22.6 acres of riparian buffer area that are likely to be permanently impacted by the new runway (Tables 4-19 through 4-21). The mitigation fund value is likely to be \$10 to \$15 million.

9.49

These streams and wetland impacted by the new runway drain into Brier Creek, Crabtree Creek and then into William B. Umstead State Park. The draft EA calls for those millions of dollars in mitigation funds to be diverted off site to a mitigation bank – we believe that is wrong. Crabtree Creek and William B. Umstead State Park are the water resources most impacted and their downstream protection should be the priority for these millions. The EA should be changed to:

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- Require that mitigation for stream and wetland impacts be used on-site and/or adjacent lands to William B. Umstead State Park to protect Haley's Branch, Crabtree Creek or other tributaries to Crabtree Creek.
- Request RDUAA use the mitigation funds to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

9.1

**Instead of RDUAA writing a check to an off-site banker that serves no value to the Crabtree Creek watershed, provide on-site mitigation by land preservation to protect Haley's Branch and the Crabtree Creek tributaries.** The net result: Crabtree Creek tributaries and William B. Umstead State Park are better protected and the required mitigation is accomplished by the value of the protected property with a net savings of dollars spent and improved community goodwill.

9.1

#### **Section 4.14.4. Cumulative Impact Determination – Add Impacts to William B. Umstead State Park,**

The Section 4.14.4, Table 4-27 should be revised, it is inaccurate. There will be impacts to William B. Umstead State Park, a 4(f), LWCF 6(f) and National Register of Historic Places property.

Although the proposed runway is moving a runway farther to the west (away from the Park), Cumulative Impacts will occur. These include and should be acknowledged:

15.1

15.2

- Crabtree Creek will be affected given the large number of streams and wetlands that will be permanently destroyed or impacted upstream.
- Deforestation, massive 8,200 impervious parking lot addition, light pollution, noise pollution, and stormwater pollution impacts from the Park Economy 3 in close proximity to the Park
- Deforestation, massive impervious 4,200 parking lot with maintenance and refueling facilities, with light pollution, noise pollution, and stormwater pollution impacts from the Rental Car Storage in close proximity to the Park

The Umstead Coalition is focused upon serving and protecting William B. Umstead State Park. William B. Umstead State Park was established in 1934 and is one of most visited NC State Parks, many of which access the Park via the East Coast Greenway (in the Old Reedy Creek Road Recreational corridor) that connects Lake Crabtree County Park to William B. Umstead State Park. Like the airport, William B. Umstead State Park is a great community asset. William B. Umstead State Park and the Raleigh-Durham International Airport share 6.2 miles of common boundary.

5.14

Cc:

Tommy L. Dupree, FFA, Memphis Airports District Office, [tommy.dupree@faa.gov](mailto:tommy.dupree@faa.gov)  
 Douglas White, USEPA, Region 4 Strategic Programs Office, NEPA Section  
 Aaron Braswell, Environmental Protection Specialist, FAA  
 Ray Sauvajot, Associate Director, Natural Resource Stewardship and Science, National Park Service,  
 1849 C Street NW, Washington DC 20240, 202-208-6843  
 Mark Foust, Regional Director, National Park Service, 100 Alabama St, SW, 1924 Building, Atlanta GA  
 30303 (404-507-5600)  
 Renee Gledhill-Earley, Environmental Review Coordinator, NC State Historic Preservation Office  
 ([Renee.Gledhill-Earley@ncdcr.gov](mailto:Renee.Gledhill-Earley@ncdcr.gov))  
 Ramona Bartos, Deputy, State Historic Preservation Officer, [ramona.bartos@ncdcr.gov](mailto:ramona.bartos@ncdcr.gov)  
 Patrick Hannah, Chair and the RDUAA Board Members  
 Reid Wilson, Secretary, NC Department of Natural and Cultural Resources  
 Brian Strong, Acting Director, NC Division of Parks and Recreation  
 Scott Letchworth, Superintendent, William B. Umstead State Park

**William B. Umstead State Park's 55 DNL Aircraft Noise Protective Status**

William B. Umstead State Park began as a National Park Service (NPS), Department of the Interior in 1934. The Federal Park was called the Crabtree Creek Recreational and Demonstration Project, aimed to restore or redevelop sub-marginal agricultural land. William B. Umstead State Park was established in 1934 as a National Park by the National Park Service, US Department of Interior. The Park was sold to the State of North Carolina in 1943 for one dollar, with **the National Park Service (NPS) making preservation a condition of the sale (Deed Restriction from the National Park Service).**

5.12

The FAA NEPA compliance guidance (FAA 1050.1E) gives special consideration to the evaluation of the significance of noise impacts on noise-sensitive areas within national parks, national wildlife refuges and historic sites and states that 14 CFR Part 150 Land Use Compatibility Guidelines and the DNL 65 dB threshold of significance for noise do not adequately address the effects of noise on visitors to areas where other noise is low and a quiet setting is a generally recognized purpose and attribute.

6.6

Users of William B. Umstead State Park have an expectation of a quiet natural forest recreational site. In fact, most of the William B. Umstead State Park have noise levels of 40-45dB. Additional noise from RDU Airport are not allowed, as that constitutes a "taking."

5.13

William B. Umstead State has several Federal, State and local protective designations directly applicable to the areas in the Park now affected by the current and proposed Triangle quarry including:

5.15

- National Register of Historic Places (NRHP), 1995 listing, Site ID is: WA0721
- Deed Restriction from the National Park Service (NPS), Department of Interior with Reverter Clause
- Federal Land and Water Conservation Fund (LWCF) protections (Section 6(f))
- 1970 agreement between the U.S Dept. of Transportation and the Department of the Interior regarding noise levels (55LDN) in the Everglades National Park
- Section 4(f) of the U.S. Department of Transportation Act of 1965
- FAA 1050.1E , National Policy: Environmental Impacts: Policies and Procedures (for compliance with the National Environmental Policy Act (NEPA)), Effective March 20, 2006
- Piedmont Beach Natural Area – National Natural Landmark, National Park Service
- William B. Umstead State Park General Management Plan (GMP)
- State Nature and Historic Preserve Dedication (Dedicated Nature Preserve)
- State Natural Heritage Dedication
- 90-acre Crabtree Natural Area within Reedy Creek section south of Crabtree Creek and north of the Reedy Creek Picnic Area – designated ecosystems described as "sanctuary" in the National Register of Historic Place Application, designated primarily for its abundance of over fifty shrub species
- Constitution of the State of North Carolina, Article XIV, Section 5
- N.C. Environmental Policy Act of 1971
- Neuse River Riparian Buffer Rules
- Connected Greenways (including the East Coast Greenway, aka Old Reedy Creek Road)
- Local Government Zoning Protections

5.15 cont

A few highlights from these protections are given below:

**National Register of Historic Places, 1995 listing**

William B. Umstead State Park, including its forests, is listed under the **National Register of Historic Places (NRHP)**. The Site ID is: WA0721 (Reference number \_95000783). Year of Registration: June 30, 1995. Listed under: 'Crabtree Creek Recreational Demonstration Area" and "Umstead State Park, Raleigh, NC." William B.

13.2

Umstead State Park was established in 1934. The boundaries of the Historic District reflect the boundaries of the Park lands that were deeded to the State of North Carolina by the U.S. Department of the Interior (National Park Service) on March 12, 1943. The areas of Significance in the listing include (1995 Application from NC Department of Cultural Resources, Summary pages and map, Attachment)

13.2

- Domestic Camp
- Recreation & Cultural/outdoor recreation
- Landscape/park
- Landscape/forest
- Landscape/natural feature
- Landscape/conservation area
- Transportation/pedestrian-related
- Transportation/road related

13.2 cont.

The 4,912.16 acres of forested landscape and recreation aspects are included in the NRHP listing and are a critical and integral reason for the NRHP listing. The forests of William B. Umstead State Park are explicitly included and protected by the NRHP listing and highlighted throughout the Application. The boundary map, including the forests are included in the Application (see attachments below).

The application for the listing in the NRHP highlights the importance of the landscape design throughout the Application with emphasis, including its conclusion:

*"In conclusion, the underlying order of the New Deal-era landscape design and the visual connections realized through certain natural and man-made elements, such as the roads, trails, forests, and lakes, help to weave the landscape of various distinct parts into a visually and functionally cohesive whole."* (Section 7, Page 3, Application NRHP, within Summary pages, Attachment).

**Deed Restriction from the National Park Service (NPS), Department of Interior**

What is now William B. Umstead State Park started as a Federal Park under the National Park Service (NPS), US Department of Interior in 1934 and was initially called "Crabtree Creek Recreational and Demonstration Project." The Park became a North Carolina State park on March 6, 1943 (the deed was dated March 12, 1943 and certified in Wake County on April 6, 1943) Fred Johnson, regional director of the National Park Service, formally presented the deed to Crabtree Creek Park to R. Bruce Etheridge, director of the N.C. Department of Conservation and Development. The Federal government turned over 5,088 acres of land from its Crabtree Creek Recreational and Demonstration Project to the state.

13.3

The Reverter Clause in the deed states that "upon the express condition that the State of North Carolina shall use the said property exclusively for public park, recreational and conservation purposes." According to the agreement, the title and right to the possession of the land would revert to the United States of America if it is found that the State of North Carolina uses the property for other purposes. The language of the Reverter Clause:

13.4

*"the grantee... shall use the property exclusively for public park, recreational, and conservation purposes.... Upon a finding that the grantee has failed to comply with these conditions during a period of more than three years, the lands and all improvements shall be returned to the jurisdiction of the U. S. Department of the Interior."*

**Federal Land and Water Conservation Fund (LWCF) protections (Section 6(f))**

William B. Umstead State Park falls under the conditions of *Section 6(f) of the Federal Land and Water Conservation Fund (LWCF) Act of 1965*, which says that no property acquired or developed with LWCF assistance, shall be converted to other than public outdoor recreation without approval of the Secretary of the Interior. Such approval can be given only if conditions assure that any substituted outdoor recreation property equals the taken property's value, quality, location and usefulness (Attachment, NCDPR, Map of LWCF properties within William B. Umstead State Park).

] 16.1

**1970 agreement between the U.S Dept. of Transportation and the Department of the Interior regarding noise levels (55LDN) in the Everglades National Park**

A 1970 agreement between the U.S. Department of Transportation and the U.S. Department of the Interior set a precedent of protection from noise generated by airplanes flying overhead. The Miami Port Authority proposed to develop a modern jetport in the Everglades Park vicinity. The Audubon Society and the Sierra Club took up the battle to preserve the natural integrity of the Everglades. As a result, in 1970, an agreement was reached between the U.S Dept. of Transportation and the Department of the Interior that noise levels in the Everglades National Park, "shall not be greater than a Composite Noise Rating (CNR) of 90 (equivalent to 55 LDN or 55 DNL)."

] 16.1

**Section 4(f) of the U.S. Department of Transportation Act of 1965**

Section 4(f) of the U.S. Department of Transportation Act of 1965 has also been cited to protect public parks. Either the physical taking or the use of land can invoke section 4(f). In the U. S. Court of Appeals for the Ninth Circuit in the *Brook vs. Volpe* case (March 2, 1972), the court held that the introduction of noise levels (for example, from airports and roads) into a recreation area is a "taking of land" and is subject to Section 4(f) requirements. Federal agencies (e.g., FAA, USDOT) can not approve actions requiring the use of properties under Section 4(f) of the DOT Act unless there is no feasible and prudent alternative to the use and the program includes all possible planning to minimize harm from the use.

] 16.2

**FAA 1050.1E , National Policy: Environmental Impacts: Policies and Procedures (for compliance with the National Environmental Policy Act (NEPA)), Effective March 20, 2006**

The FAA NEPA compliance guidance gives special consideration to the evaluation of the significance of noise impacts on **noise-sensitive areas** within national parks, national wildlife refuges and **historic sites** and states that 14 CFR Part 150 Land Use Compatibility Guidelines and the DNL 65 dB threshold of significance for noise do not adequately address the effects of noise on visitors to areas where other noise is low and a **quiet setting is a generally recognized purpose and attribute**. (see Sections 4.3, 6, 11.1a, 11.1f, 14.3, 14.5e, 14.5f, 14.5g, and more).

] 16.7

**Piedmont Beach Natural Area – National Natural Landmark, National Park Service**

<https://www.nps.gov/subjects/nlandmarks/site.htm?Site=PIBE-NC>

The 61 acre **Piedmont Beech Natural Area** is located along **Crabtree Creek** within William B. Umstead State Park, is one of the best examples of mixed mesophytic forest in the eastern Piedmont of North Carolina. Portions of the site contain unusual examples of good, maturing stands of beech. This was designated as a National Natural Landmark in 1974.

] 16.3

**William B. Umstead State Park per the General Management Plan (GMP)**

The Mission Specific to William B. Umstead State Park per the General Management Plan (GMP)  
 (<https://files.nc.gov/ncparks/481/WIUM%20GMP%20FINAL%20112117.pdf>, accessed March 13, 2023):

*"William B. Umstead State Park was established (as a NC State Park) in 1943 when it was deeded to the State of North Carolina by the federal government. Deed restrictions specify that the park must serve "public park, recreation, and conservation purposes" or revert to federal ownership. A federal land reclamation demonstration project that portrayed the potential of using sub marginal farmland for recreation and conservation established the park. William B. Umstead State Park has returned to a predominantly natural condition since its establishment. The park enhances local air and water quality, protects an extensive undeveloped area in a rapidly growing region, and offers an urban population the opportunity to experience an extensive natural setting. This park is a typical example of successful reclamation of sub marginal farmland and increasing citizen appreciation for the value of open space and natural landscapes. Several themes and trends identified in the N.C. State Parks System wide Plan are protected including: hiking trails, equestrian trails, multiuse trails, biking, canoeing, and tent and trailer camping. William B. Umstead State Park has significant scenic resources that provide views of the largest natural landscape in the Research Triangle area. Undeveloped lakefronts at Big, Sycamore, and Reedy Creek Lakes, forest communities and creeks provide view shed protection within an urban area. **Significant recreation resources include: an extensive multiple-use trail system, three constructed lakes suitable for a variety of water-based recreation activities, and areas with potential for the development of facilities for visitors. Recreational development and activities must be compatible with protection of the resources of the park.** The resources and proximity to urban populations combine to enhance cultural and environmental education possibilities.*

*William B. Umstead State Park serves to protect valuable biologic, recreational, cultural, scenic and geological resources. The mission for the Division of Parks and Recreation is to preserve resources and providing park experiences that promote pride in and understanding of natural heritage of North Carolina."*

William B. Umstead State Park users enjoying the Park for hiking, running, nature appreciation, tranquility, biking, picnicking, bird watching and more. There is an expectation quiet in a natural setting.

] 6.8

**State Nature and Historic Preserve Dedication Act (Dedicated Nature Preserve)**

In 1973, the North Carolina General Assembly passed the *State Nature and Historic Preserve Dedication Act* to:

*"prescribe the conditions and procedures under which properties may be specifically dedicated for the purposes enumerated by Article 14, Section 5 of the North Carolina Constitution (Conservation of Natural Resources), accepted by the General Assembly for said purposes, and thereby constitute part of the State Nature and Historic Preserve" (G.S. Article 25B, 143-260.6 to 143-260.10).*

A majority of acres within William B. Umstead State Park is a component and has protection as a Dedicated Nature Preserve. The boundary of the forested acres is highlighted in page 5 of the Park's GMP. The acres in the Park included in the Dedicated Nature Preserve include the majority of the Park formal and informal trails (Section III, Page 5, Application NRHP, within Summary pages, Attachment). Three-fifths majority of the General Assembly is required to add or remove land from such preserves

Related, there is nothing in the NC Statutes that prevents hiking off-trail with in William B. Umstead State Park. Off-trail hiking is common in William B. Umstead State Park, as well as the rest of the NC State Parks. To

] 5.16



highlight this point, NC State Visitor Centers at various parks sell guide books to off-trail historic sites and waterfalls.

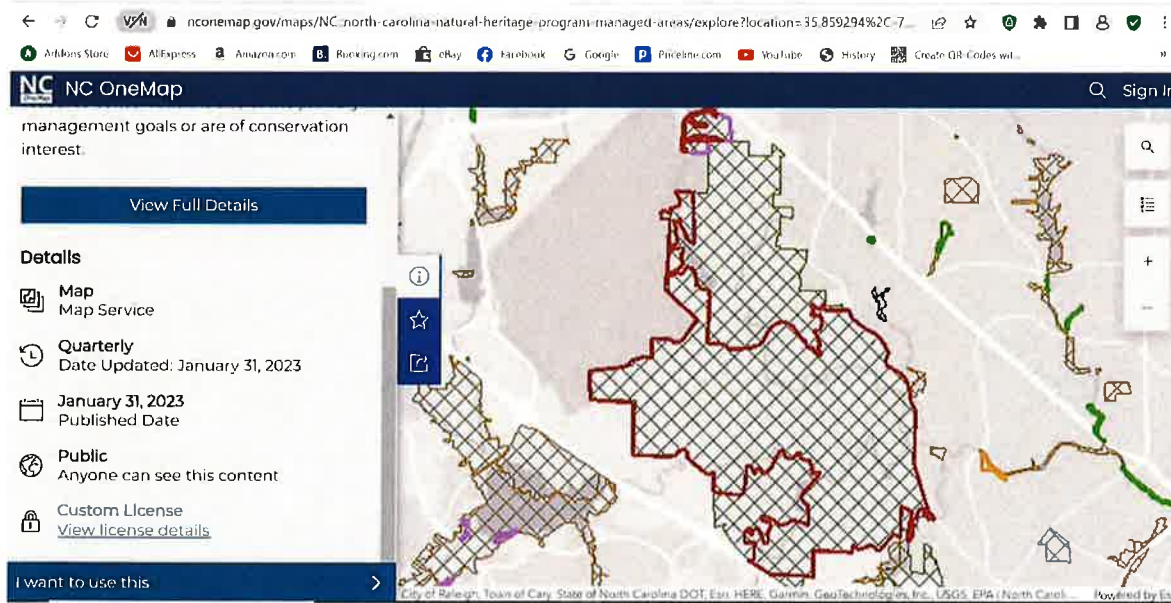
**North Carolina Natural Heritage Dedication**

In 1985, the NC Legislature passed the "Nature Preserve Act" whose purpose was to "establish and maintain a State Registry of Natural Heritage Areas." From the North Carolina Natural Heritage Program web site (<https://www.nconemap.gov/maps/NC::north-carolina-natural-heritage-program-managed-areas/about>, accessed February 5, 2023):

*"The North Carolina Natural Heritage Program's Managed Areas are a collection of properties and easements where natural resource conservation is one of the primary management goals or are of conservation interest.*

*The North Carolina Natural Heritage Program's Managed Areas are primarily a collection of fee simple properties and easements where natural resource conservation is one of the primary management goals. It does include a number of properties and easements that are not primarily managed for conservation, but that are of conservation interest. This conservation interest ranges from properties and easements which support rare species and intact, high-quality natural communities to those that are open spaces in places where open space is scarce. Lands that are Dedicated Nature Preserves or Registered Heritage Areas are found in this data set."*

The boundary of the North Carolina Natural Heritage Area dedicated lands for William B. Umstead State Park are similar to the lands included in the NC State Nature Preserve as seen from screen print from web site (<https://www.nconemap.gov/maps/NC::north-carolina-natural-heritage-program-managed-areas/explore?location=35.859294%2C-78.747902%2C12.92>, accessed February 5, 2023):



5.17



**The Constitution of the State of North Carolina, Article XIV, Section 5**

William B. Umstead State Park is further protected under the *Constitution of the State of North Carolina, Article XIV, Section 5* which states that, "It shall be the policy of this state to conserve and protect its lands and waters for the benefit of all its citizenry, and to this end it shall be a proper function of the State of North Carolina and its political subdivisions to acquire and preserve park, recreational and scenic areas, to control and limit the pollution of our air and water, to control excessive noise...."

} 5.18

**N.C. Environmental Policy Act of 1971**

The North Carolina General Assembly passed the *Environmental Policy Act of 1971* "to ensure that an environment of high quality will be maintained for the health and well-being of all...." The Act declares:

} 5.19

*"It shall be the continuing policy of the State of North Carolina to conserve and protect its natural resources and to create and maintain conditions under which man and nature can exist in productive harmony. Further, it shall be the policy of the State to seek, for all its citizens safe, healthful, productive, and aesthetically pleasing surroundings; to attain the widest possible range of beneficial uses of the environment without degradation, risk to health or safety; and to preserve the important historic and cultural elements of our common inheritance."* (G.S. 113A-3).

**NC Neuse River Basin Riparian Buffer Protection Program**

The Neuse River Basin Riparian Buffer Protection Program, aka Neuse Buffer Rules (15A NCAC 02b.0714, amended June 15, 2020) protects a 50-foot buffer along streams within the Neuse River Basin. All the streams within the RDU Airport and William B. Umstead State Park are protected under the Neuse Buffer Rules.

} 9.51

**Connected Greenways (including the East Coast Greenway, aka Old Reedy Creek Road)**

The section of William B. Umstead State Park adjacent to the RDU Airport is a popular area for hikers, nature lovers and easily accessible from the Old Reedy Creek Road corridor.

Wake County Commissioners and the RDU Airport Authority (RDAAA) executed a 10-year lease in December 2022 for mountain bike and pedestrian trails on an adjacent 151-acre forested tract known as "286 East). This tract is adjacent to William B. Umstead State Park and the East Coast Greenway.

The Old Reedy Creek Recreational Area is a vital greenway, vital greenway connector, and one of the most heavily used recreational corridors in the region. The "road" is THE official greenway.

The Old Reedy Creek Road is not only heavily used by hikers, runners, and bikers as the connecting hub for the Triangle Regional Greenways, it also has official designation as being part of the route for State and Federal Greenway trail systems (See Attachments):

} 5.20

- US1 Carolina Connection (<https://www.ncdot.gov/bikeped/ncbikeways/routes/us1-carolina-connection/>)
- WalkBikeNC, North Carolina's Bicycle and Pedestrian Plan which was adopted by the NCDOT Board of Transportation in December 2013 (<https://www.ncdot.gov/bikeped/walkbikenc/>)
- East Coast Greenway (<https://map.greenway.org/>) and authorized in 2021 by the NC General Assembly to be a component of the NC State Park system.

The attached "Regional Trails" graphic from the Town of Cary (<https://www.townofcary.org/home/showpublisheddocument?id=17899>) highlights the vital importance of the East Coast Greenway (aka Old Reedy Creek Road greenway) connecting William B. Umstead State Park to Cary, Morrisville, Apex, Raleigh, and Durham's greenways and connection to Wake County's Lake Crabtree County Park.

Old Reedy Creek Road is extremely popular. At any time, the "road" (greenway) is used by runners, nature lovers, walkers, bikers, baby strollers, school tract clubs, running and biking groups, community events hosted by local outdoor/running/biking retailers, and families. Furthermore, as several citizens documented in their Public Hearing Comments, it is also a key **transportation/commuting** corridor.

It is reasonable to estimate that the Old Reedy Creek Road Recreational Area is utilized by well over 1,000,000 million users per year. Given the fact that Wake County's Lake Crabtree County Park and William B. Umstead State Park visitation is well over this number, it is likely the visitation rate is much higher.

The Public investment in greenways in Wake and Durham Counties is extensive (millions of dollars). These public investments are extremely popular and part of the economic engine of this community. The Old Reedy Creek Road Recreational Corridor is a key connector and integral part of these huge public investments, which include:

- Town of Cary's Old Reedy Creek Road Trailhead at 2139 Reedy Creek Road (<https://www.townofcary.org/recreation-enjoyment/parks-greenways-environment/parks/old-reedy-creek-road-trailhead>)
- Wake County's Lake Crabtree County Park (<https://www.wakegov.com/departments-government/parks-recreation-and-open-space/all-parks-trails/lake-crabtree-county-park>)
- The Town of Morrisville's Crabtree Creek Greenway and Hatcher Creek Greenway which were built to connect the Town of Morrisville to Lake Crabtree County Park and to the Old Reedy Creek Road entrance to William B. Umstead State Park
- (in planning by CAMPO) Triangle Bikeway will follow I-40 and link Raleigh, Research Triangle Park (RTP), Durham and Chapel Hill along I-40 and NC 54. (<https://trianglebikeway.com/>)

Other connecting greenways to the Old Reedy Creek Road Recreational Area include:

- Town of Cary's Black Creek Greenway and Bond Park
- Town of Cary's White Oak Creek Greenway
- Town of Apex's Beaver Creek Greenway and Bicycle and Pedestrian System Plan
- Wake and Durham's American Tobacco Trail
- Raleigh's Crabtree Creek Greenway and Neuse River Trail
- Raleigh's House Creek Greenway and the NC Art Museum
- Raleigh's Reedy Creek Greenway and the NC Art Museum
- Raleigh's Rocky Branch Trail
- Raleigh's Walnut Creek Trail

The following highlights a few details about the **official greenway designations for Old Reedy Creek Road** (this is not a "road" it is a vital greenway):

#### **US1 – Carolina Connection**

<https://www.ncdot.gov/bikeped/ncbikeways/routes/us1-carolina-connection/>

From NCDOT web site:

*“Designated as a portion of US Bike Route 1, which runs from Maine to Florida, this route covers almost 200 miles of rolling terrain. It is the main north/south connector route through the central portion of North Carolina. From Virginia, this route enters North Carolina near the Warren / Vance County border. US 1 continues south between Raleigh and Durham and eventually through Sanford, Southern Pines, and Laurinburg before advancing into South Carolina.”*

**WalkBikeNC, North Carolina's Bicycle and Pedestrian Plan (<https://www.ncdot.gov/bikeped/walkbikenc/>)**

From NCDOT's web site:

*“WalkBikeNC, North Carolina's Bicycle and Pedestrian Plan, was adopted by the NCDOT Board of Transportation in December 2013. The adoption concluded an 18-month planning process that included comprehensive stakeholder and public engagement across the entire State. The Plan lays out a framework for improving bicycle and pedestrian transportation as a means to enhance mobility, safety, personal health, the economy, and the environment.*

*The WalkBikeNC website serves as a gateway to access the many bicycle and pedestrian resources across the State. The website is organized by the five pillars of safety, health, economy, mobility, and environment. Within each pillar portal is a summary of existing conditions, recommendations, action steps, and other resources. The website also includes a link to the new state bike route map application site ([ncbikeways.com](http://ncbikeways.com)) along with a listing of bicycle/pedestrian advocacy groups.”*

**East Coast Greenway (<https://www.greenway.org/>)**

From the East Coast Greenway web site:

*“The East Coast Greenway connects 15 states and 450 cities and towns for 3,000 miles from Maine to Florida. We are fostering a safe walking and biking route through the country's most populated corridor.”*

**Local Government Protections for the Park**

Raleigh's *Metro Park Protection Overlay District* is applied to lands adjacent to William B. Umstead Park. These protections include: a 30 feet undisturbed tree buffer (no cutting or grading) along the Park Boundary, a 50 ft. (25 each side) undisturbed tree buffer maintained along all waterways that flow to the Park and drain 5 acres or more, and Raleigh City Council approval for any development other than single-family detached homes.

In addition, the sections within the Metro Park Overlay of Ebenezer Church and Trenton Roads are designated as Sensitive Minor Thoroughfares, 2-lane roads.

The City of Raleigh approved the Metro Park Overlay District Ordinance in 1989. This District provides land use and water resource protections to lands near William B. Umstead State Park.

The City of Raleigh applied the Metro-Park Overlay District and Residential R-2 zoning to residential lands surrounding William B. Umstead State Park on March 20, 1990.

The Towns of Cary and Morrisville, the Cities of Raleigh and Durham, as well as the Counties of Wake and Durham have noise ordinances

**Attachments**

**Certificate of Entry in the National Register of Historic Places for William B. Umstead State Park, effective June 30, 1995 and selected pages, including boundary map.**

**Land and Water Conservation Fund (LWCF) boundary map, William B. Umstead State Park, July 2019**

**NC Bicycle and Pedestrian Trail Systems along the Old Reedy Creek Road Recreational Corridor including: East Coast Greenway, US 1 Carolina Connection**



## North Carolina Department of Cultural Resources

James B. Hunt Jr., Governor  
Betty Ray McCain, Secretary

July 6, 1995

Division of Archives and History  
William S. Price, Jr., Director

Dr. Phillip K. McKnelly, Director  
N. C. Division of Parks and Recreation  
Archdale Building  
512 North Salisbury Street  
Raleigh, North Carolina 27604-1148

Re: Certificate of Entry in the National Register of Historic Places  
Crabtree Creek Recreational Demonstration Area (William B. Umstead  
State Park), Raleigh, Wake County, June 30, 1995

Dear Dr. McKnelly:

I am pleased to inform you that the above-referenced property has been entered in the National Register of Historic Places. An official certificate of listing is enclosed. Also enclosed for your information is a copy of the nomination. You are most fortunate to own and preserve a property that justly deserves this honor.

The National Register has been called "a roll call of the tangible reminders of the history of the United States." It is, therefore, a pleasure for the Division of Archives and History to participate in this program and thereby make our nation aware of North Carolina's rich cultural heritage.

In order that we may keep our records up to date, it would be very helpful if you would notify us of any major alteration of the property, including moving, destruction, remodeling, or restoration. We appreciate your cooperation in preserving the best of our past for posterity.

Sincerely,

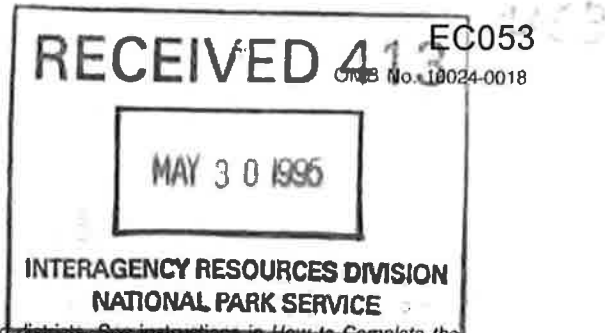
A handwritten signature in cursive script that reads "Jeffrey J. Crow".

Dr. Jeffrey J. Crow  
Acting State Historic Preservation Officer

WSP,Jr/ant

enclosures

cc: The Honorable Jesse Helms  
The Honorable Lauch Faircloth  
The Honorable Fred Heineman  
Mr. Joe Henderson, Acting Director, State Properties Office  
The Honorable Tom Fetzner, Mayor, City of Raleigh  
Ms. Susan Regier, Resource Management, N. C. Division of Parks and Recreation  
Dr. Jean Spooner, Umstead Coalition  
Mr. Dan Becker, Executive Director, Raleigh Historic Districts Commission  
Ms. Helen Ross, nomination preparer  
109 East Jones Street • Raleigh, North Carolina 27601-2807



United States Department of the Interior  
National Park Service

National Register of Historic Places  
Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in How to Complete the National Register of Historic Places Registration Form (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property

historic name Crabtree Creek Recreational Demonstration Area  
other names/site number Umstead State Park

2. Location

street & number roughly bounded by I-40, US 70, & RDU Airport N/A not for publication  
city or town Raleigh N/A vicinity  
state North Carolina code NC county Wake code 183 zip code 27612

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this  nomination  request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property  meets  does not meet the National Register criteria. I recommend that this property be considered significant  nationally  statewide  locally. (See continuation sheet for additional comments.)

William S. Pringle SHPO 4.25.95  
Signature of certifying official/Title Date

State of Federal agency and bureau

In my opinion, the property  meets  does not meet the National Register criteria. (See continuation sheet for additional comments.)

Signature of certifying official/Title Date

State or Federal agency and bureau

4. National Park Service Certification

- I hereby certify that the property is:  
 entered in the National Register.  
 See continuation sheet.
- determined eligible for the National Register.  
 See continuation sheet.
- determined not eligible for the National Register.
- removed from the National Register.
- other, (explain.) \_\_\_\_\_

Edson H. Beall Signature of the Keeper  
Entered in the National Register 6/30/95 Date of Action

5. Classification

Ownership of Property

(Check as many boxes as apply)

- private
- public-local
- public-State
- public-Federal

Category of Property

(Check only one box)

- building(s)
- district
- site
- structure
- object

Number of Resources within Property

(Do not include previously listed resources in the count.)

Contributing	Noncontributing	
128	40	buildings
6	8	sites
6	1	structures
		objects
140	49	Total

Name of related multiple property listing

(Enter "N/A" if property is not part of a multiple property listing.)

Historic and Architectural Resources of Wake County, NC (ca.1770-1941)

Number of contributing resources previously listed in the National Register

-0-

6. Function or Use

Historic Functions

(Enter categories from instructions)

- Domestic/camp
- Recreation & Culture/outdoor recreation
- Landscape/park
- Landscape/forest
- Landscape/natural feature
- Landscape/conservation area
- Transportation/pedestrian-related
- Transportation/road-related

Current Functions

(Enter categories from instructions)

- Domestic/camp
- Recreation & Culture/outdoor recreation
- Landscape/park
- Landscape/forest
- Landscape/natural feature
- Landscape/conservation area
- Transportation/pedestrian-related
- Transportation/road-related

7. Description

Architectural Classification

(Enter categories from instructions)

Other: NPS Rustic

Materials

(Enter categories from instructions)

foundation stone

walls wood

roof asphalt

other concrete

Narrative Description

(Describe the historic and current condition of the property on one or more continuation sheets.)



United States Department of the Interior  
National Park Service

# National Register of Historic Places Continuation Sheet



Section number 7 Page 1

Crabtree Creek RDA (Umstead State Park)  
Wake County, NC

### SUMMARY DESCRIPTION

The Crabtree Creek Recreational Demonstration Area (RDA) Historic District is defined by the 1943 boundaries of the land parcels acquired by the New Deal agencies that constructed the park. The district contains a variety of buildings and structures designed to accommodate outdoor daytime recreational activities and overnight camping. The some 4912.16 acres included in the district were the subject of a detailed Master Plan completed in 1940 and include such resources as two twenty-five-acre lakes (and a fifty-five-acre lake that was planned, but not constructed until 1962) that serve as focal points for the park's recreational and scenic resources; four group camps which include ninety-two cabins and four lodges; two picnic areas with stone water fountains, a picnic shelter, and stone campfires; a free-standing frame privy remaining from a former Civilian Conservation Corps work camp; two stone-veneered vehicular bridges; a network of roads and trails; and land reclamation features such as reforestation, check dams, and firebreaks. Between 1936 and 1941, the Civilian Conservation Corps (CCC) constructed all contributing buildings and structures, created the lakes by building dams and spillways on Sycamore Creek and Reedy Creek, and executed the park's landscaping, which includes over thirty miles of hiking/bridle trails interwoven among the developed areas. All contributing buildings, structures, and sites in the district are related to a single theme, the culmination of the national movement in the Progressive and New Deal eras to create public parks and the accompanying rise of rustic architecture. The foundation source for the design of National Park architectural was Park and Recreation Structures, published by the National Park Service in 1938. The district combines examples from this architectural pattern book with quality craftsmanship and careful consideration of the relationship between architectural and landscape design to maintain the spirit and character in which the park was originally conceived and built. It includes 128 contributing buildings, six contributing structures, six contributing sites, and forty noncontributing buildings, eight noncontributing sites, and one noncontributing structure.

### DESCRIPTION

The Crabtree Creek Recreational Demonstration Area (Renamed William B. Umstead State Park in 1955) is located within the present city limits, approximately twelve miles north of downtown Raleigh, in Wake County, North Carolina. There are two entrances: the north one is located on US 70 while the southern one is on Harrison Avenue at the Interstate 40 interchange near Cary. Although the park was initially surrounded by agricultural and wooded tracts, recent major public and private development projects have changed the character of its environs. The south park boundary is near Interstate 40, a major thoroughfare. The Raleigh-Durham International Airport lies near its west boundary, and the lot lines of privately-held land parcels form the north boundary. The east boundary is near Ebenezer Church Road which is scheduled to become a collector street.

The rolling topography of the district contains three primary watercourses: Crabtree Creek, Reedy Creek, and Sycamore Creek. Crabtree and Reedy creeks flow west to east through the southern portion of the park while the Sycamore Creek wends its way north to south in the northern and eastern sections. Throughout the forested lands are small tributaries which drain into one or more of the primary creeks.

There are over thirty miles of bridle/bicycle trails and hiking paths, many of which were constructed by the Civilian Conservation Corps (CCC). There are CCC-era paved roads and firebreaks, lakes, and dams on the main watercourses and branches of the Reedy, Sycamore and Crabtree creeks. The cabins and auxiliary buildings that compose camps Lapihio, Crabtree, and Sycamore that were built by the CCC are located in the central western portion of the park, and



United States Department of the Interior  
National Park ServiceNational Register of Historic Places  
Continuation SheetSection number 7 Page 2 Crabtree Creek RDA (Umstead State Park)  
Wake County, NC

Camp Whispering Pines, also a CCC project, is near the southwest section of the park. The eastern and western regions of the park contain a few trails within almost completely unbroken forest. The majority of the park's natural landscape features, which include streams, drainage areas, ridges, and forest, remain essentially unchanged since the CCC undertook the reclamation of the landscape in the 1930s.

There are two designated ecosystems within the district: the Crabtree Natural Area and the Piedmont Beech Natural Area, which are not developed. The larger of the two, the Piedmont Beech Natural Area encompasses 105 acres located in the southeast portion of the park between a powerline clearing on the east and the old Reedy Creek Park Road on the west. It was set aside as a National Natural Landmark by the National Park Service in May 1974 because it exhibits one of the finest examples of a mixed mesophytic forest in North Carolina. The smaller sanctuary is the 90-acre Crabtree Natural Area within the Reedy Creek section south of Crabtree Creek and north of Reedy Creek Picnic Area and ranger residences. It was designated primarily for its abundance of over fifty shrub species. These natural areas were created to permit the park to serve as a protected habitat for the various plants which include several threatened and rare species (LeGrand, Harry E., Jr. and Astey, Cheryl J. Inventory of the Natural Areas of Wake County, North Carolina. Wake County Parks and Recreation Commission Grant, August, 1987, pp. 83, 85).

The largest and most scenic of the obvious planned landscape features are the three lakes. Between 1936 and 1962, three large bodies of water were formed by the damming of two of the primary streams. Centrally located amidst hilly topography is the twenty-five-acre Sycamore Lake, the park's first CCC-era dam-and-lake project created by the flow restriction of Sycamore Creek. CCC landscape planners selected the lake site as the focal point for water-related recreational activities of the three surrounding group camps, Camp Sycamore (2-G) on the northern shore, and Camp Crabtree (3-B) and Camp Lapihio (1-G) bordered the west and south beaches of the lake. Situated near the park's southeast boundary is Reedy Creek Lake, and the second CCC-era established dam-and-lake project. Originally the smaller of the two lakes when opened to the public in 1940, Reedy Creek Lake is sited below steep terrain. To the lake's west is Camp Whispering Pines (4-B) a single group camp, built between 1939 and 1940. Around 1959, the lake was enlarged to its present size of twenty-five acres. In northwest corner, is the fifty-five-acre Big Lake, the last of the lakes developed by damming Sycamore Creek. Although it was mentioned in the 1940 Master Plan, it was not actually constructed until 1962.

Some of the less tangible man-made landscape elements are the results of the CCC-era land reclamation efforts. Features such as fire and erosion controls, drainage ditches and culverts, hillside terraces, and reforestation, are located throughout the park's more remote regions. Accessed by the foot paths or fire roads, these entities helped slow and stop the physical destruction of the land and relate to the history of the CCC and its conservation philosophy.

The RDA Historic District is composed of 189 resources, 140 of which have been identified as contributing. The district is predominantly a natural environment with man-made landscape and architectural features which were sensitively designed to blend in with the existing topography. In addition to 128 contributing buildings and six contributing structures, there are six contributing sites. For example, there are three CCC-era trails which were designed to allow the hiker to experience the park's scenic highlights. Besides natural beauty, CCC-era man-made enhancements include small stone check dams (entry IV) on tributaries, and mature stands of loblolly and short-leaf pines in hillsides. Modern amenities such as footbridge and trail marker

United States Department of the Interior  
National Park Service

## National Register of Historic Places Continuation Sheet

Section number 7 Page 3 Crabtree Creek RDA (Umstead State Park)  
Wake County, NC

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replacements are considered non-contributing although they are in scale and character with resources from the park's historic period.

Other examples of contributing sites are the day-use facilities, better known as the picnic areas. There are two in the park, the Crabtree Creek Picnic Area and the Reedy Creek Picnic Area. Because of the beginning of World War II, neither facility was completely finished by the CCC. In 1940, only the physical environs of the sites were landscaped and basic sewer and water systems were installed. However, the dining conditions were extremely crude. Stone water fountains were erected; three in Crabtree, one in Reedy Creek; and three to five sets of picnic tables and benches were clustered about stone fireplaces; seven in Crabtree, three in Reedy Creek. Essentially, these small CCC-built structures, the stone water fountains and the fireplaces, are the most numerous contributing resources in the picnic areas with the exception of one CCC picnic shelter in Crabtree Creek picnic area. Resources that are non-contributing because of their age are located in the picnic areas and include buildings such as the ca. 1952 picnic shelters in Crabtree and Reedy Creek; and four modern bathrooms in Crabtree Creek, and two in Reedy Creek; and structures like metal fire grates, paved walkways, information boards, handicap water fountains, garbage containers, and small frame recycling centers. Although these resources were added later, their design, scale, and siting follow in intent and character the CCC-era 1940 Master Plan for the Crabtree Creek RDA.

Almost all buildings and associated structures in the park display the distinctive rustic style developed by the National Park Service in the 1930s. Exceptions include four 1952 and 1962 ranger residences which are standardized frame houses; the 1952 and 1962 maintenance and shop concrete block buildings; the 1962 frame boat house; and the concrete block wash house in the family camping area. However, wherever possible these elements have been designed with the sensitivity to the scale, color, scheme, and construction methods of the CCC-era buildings. The frame construction and stone or concrete pier foundations of the CCC-era buildings suggest a picturesque effect. The exterior wood siding is coarsely machine hewn to produce what became known as "waney" cladding. It is employed in vertical and horizontal arrangements. All of the buildings are unassuming and have screens or single-glazed sash windows that are protected by top-or side-hinged wood "shutters". Typically, the organized camps are arranged into several units or clusters, with cabins haphazardly arranged in a circle with a latrine, a stone fire circle, a water pump, and sometimes a lodge. The units are centered around a core of service structures, which consist of three to five building types. These include a dining hall/kitchen, office/administration building, infirmary, craft cabin, staff quarters, and storage facilities. When possible, the forest and the terrain are utilized so that cabins and lodges are sited on ridges to permit cooling breezes, scenic vistas or privacy. In addition to the construction of public recreation facilities, the CCC enrollees reclaimed and conserved soil, water, and the forest. The Recreational Demonstration Area (RDA) lands became a showcase of a successful federal program. As seen today, the group camps and day-use areas have remained generally uncompromised by modern alterations or new construction. Overnight camping, the original purpose, is still enjoyed by children's groups.

In conclusion, the underlying order of the New Deal-era landscape design and the visual connections realized through certain natural and man-made elements, such as the roads, trails, forests, and lakes, help to weave the landscape of various distinct parts into a visually and functionally cohesive whole.

### BASIC BUILDING TYPES

Sleeping Quarters: Cabins - ca. 1937-1940

**CRABTREE CREEK  
RECREATIONAL DEMONSTRATION AREA  
HISTORIC DISTRICT**

□ CONTRIBUTING BUILDING

■ NON-CONTRIBUTING BUILDING

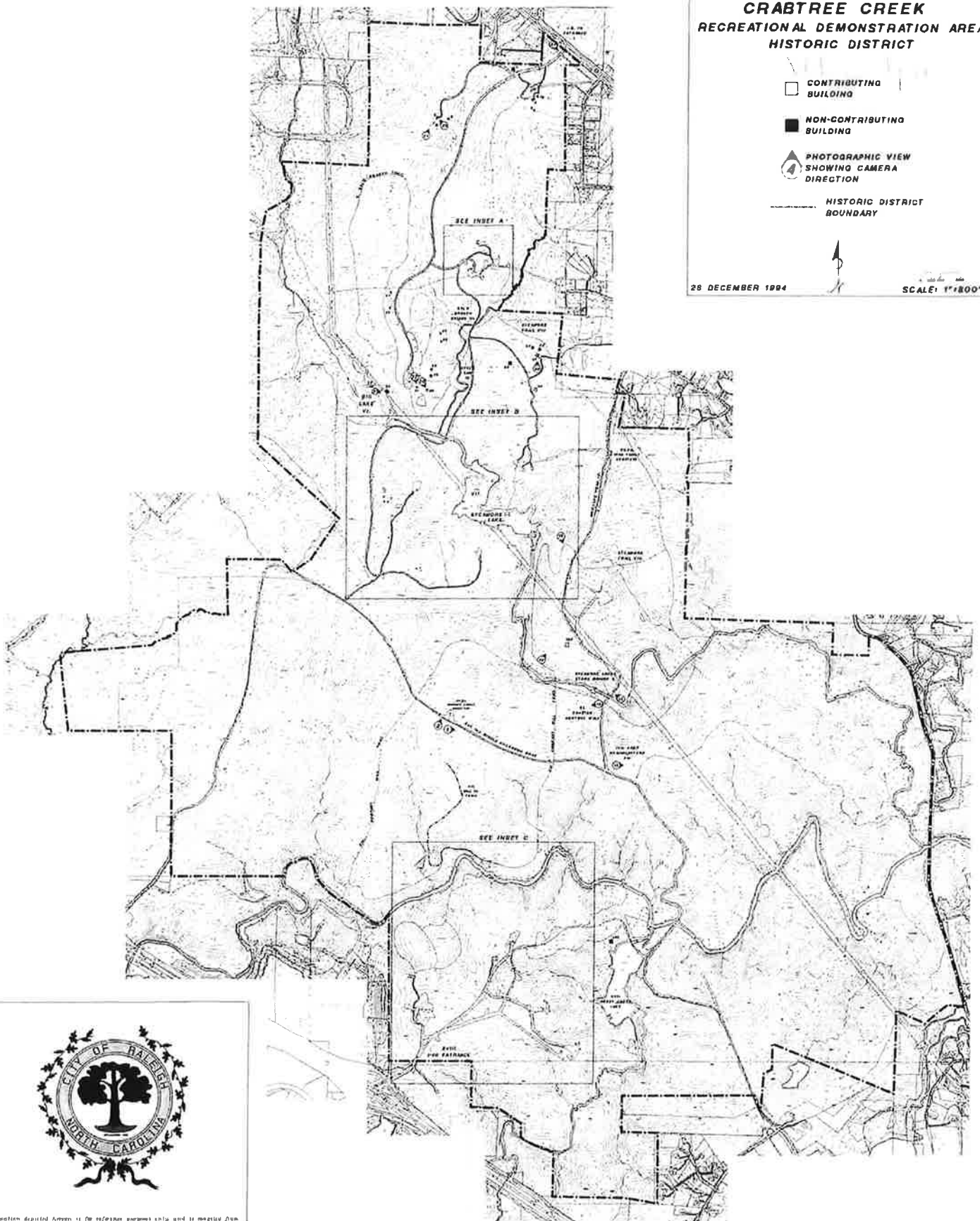
📷 PHOTOGRAPHIC VIEW SHOWING CAMERA DIRECTION

--- HISTORIC DISTRICT BOUNDARY



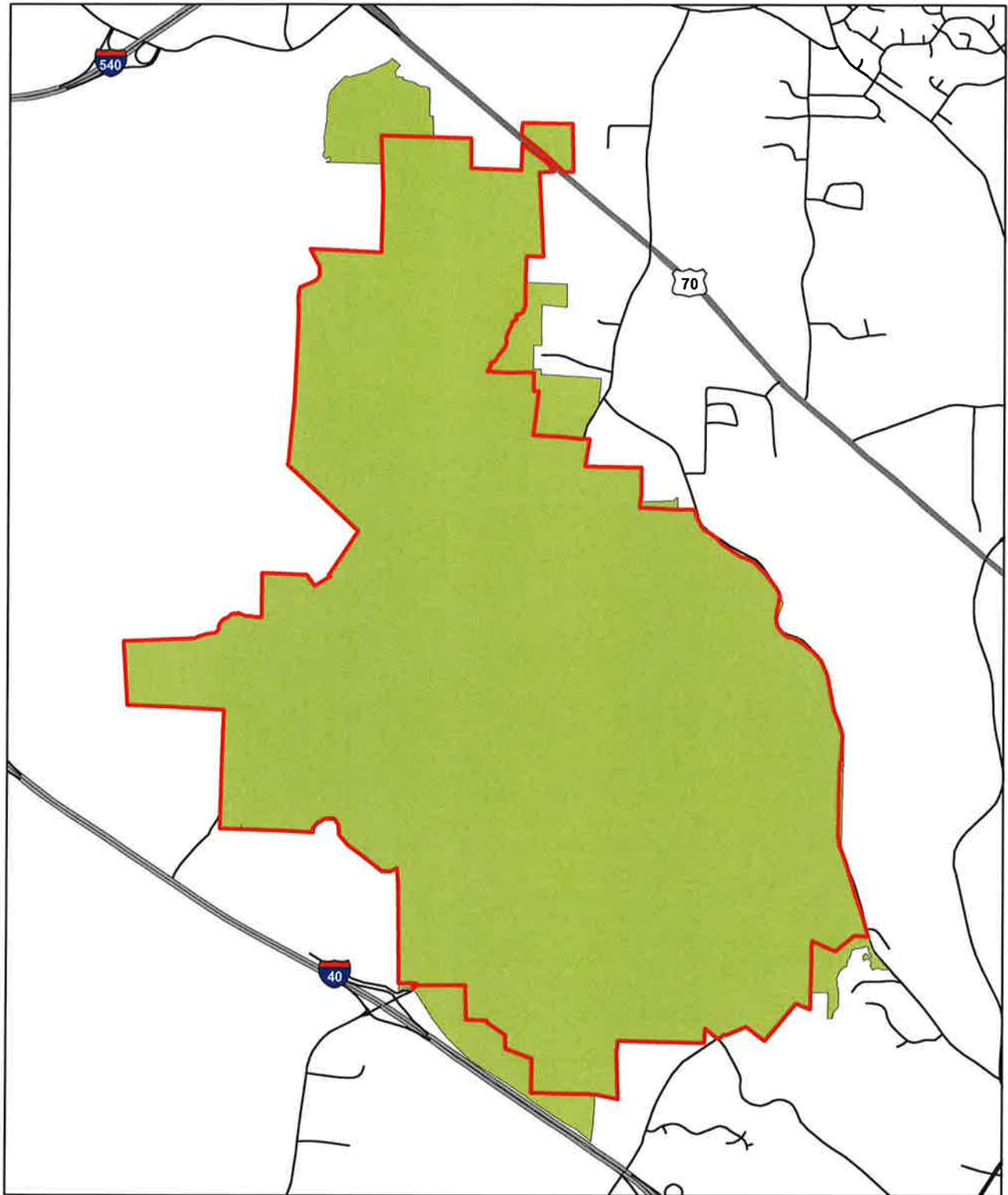
28 DECEMBER 1994

SCALE: 1"=100'





Information depicted herein is for reference purposes only and is derived from the best available sources. The City of Raleigh assumes no responsibility for errors arising from the use of this map.

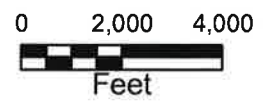
ILLUSTRATED BY: BETH GATES



William B. Umstead  
State Park

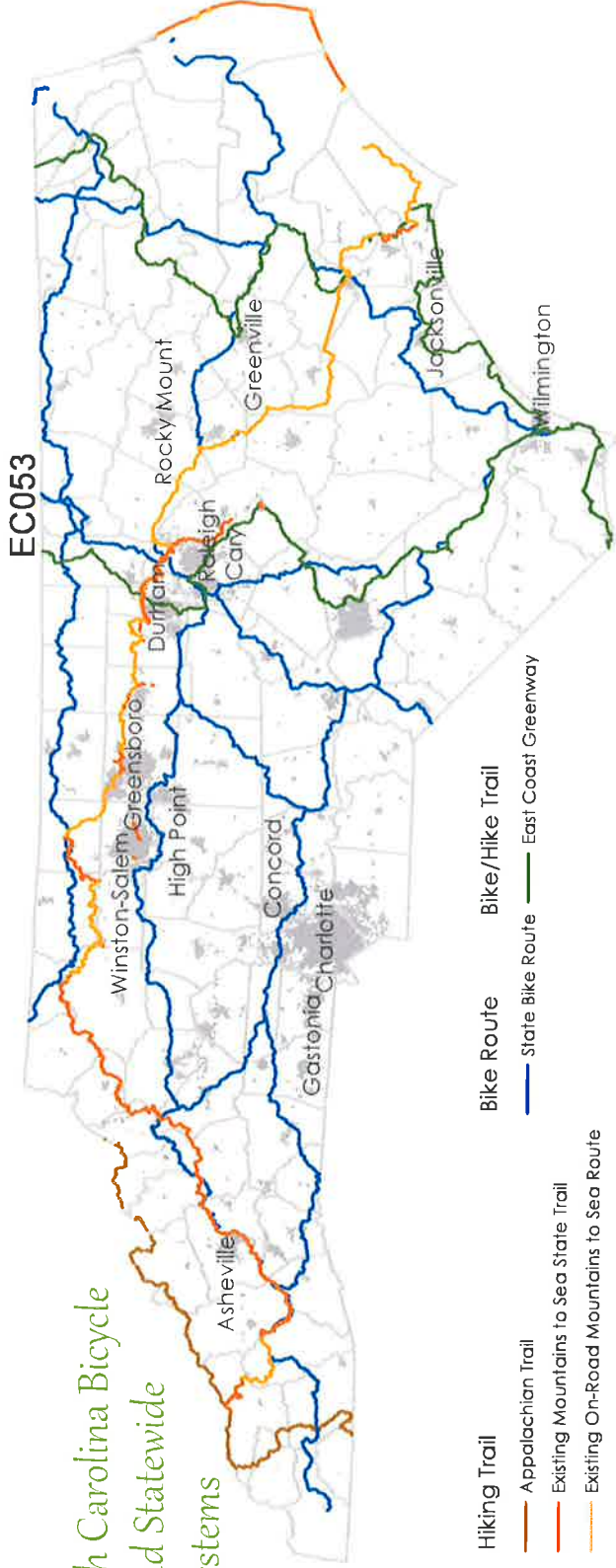
July 2019

-  State Park
-  Land and Water Conservation Fund





## Existing North Carolina Bicycle Routes and Statewide Trail Systems



### EAST COAST GREENWAY

The East Coast Greenway (ECG) is a developing multi-state trail system that extends almost 3,000 miles from Florida to Maine. At completion, the greenway will connect all major cities of the eastern seaboard by off-road paths. As of 2012 over 25% of the greenway is complete. The 360-mile North Carolina portion of the ECG travels through the eastern part of the state, with the current route connecting Durham, Raleigh, Fayetteville, and Wilmington. Approximately 18% of North Carolina's off-road route has been constructed.

<http://www.greenway.org/hc.aspx>

### Regional Trails

#### AMERICAN TOBACCO TRAIL

The American Tobacco Trail (ATT) is a rail-trail that extends from western Wake County north to downtown Durham. With the 2013 addition of a pedestrian and bicycle bridge over Interstate 40, the trail stretches a total of 22 miles. The ATT has been incorporated as part of the North Carolina segment of the East Coast Greenway.



### CAROLINA THREAD TRAIL

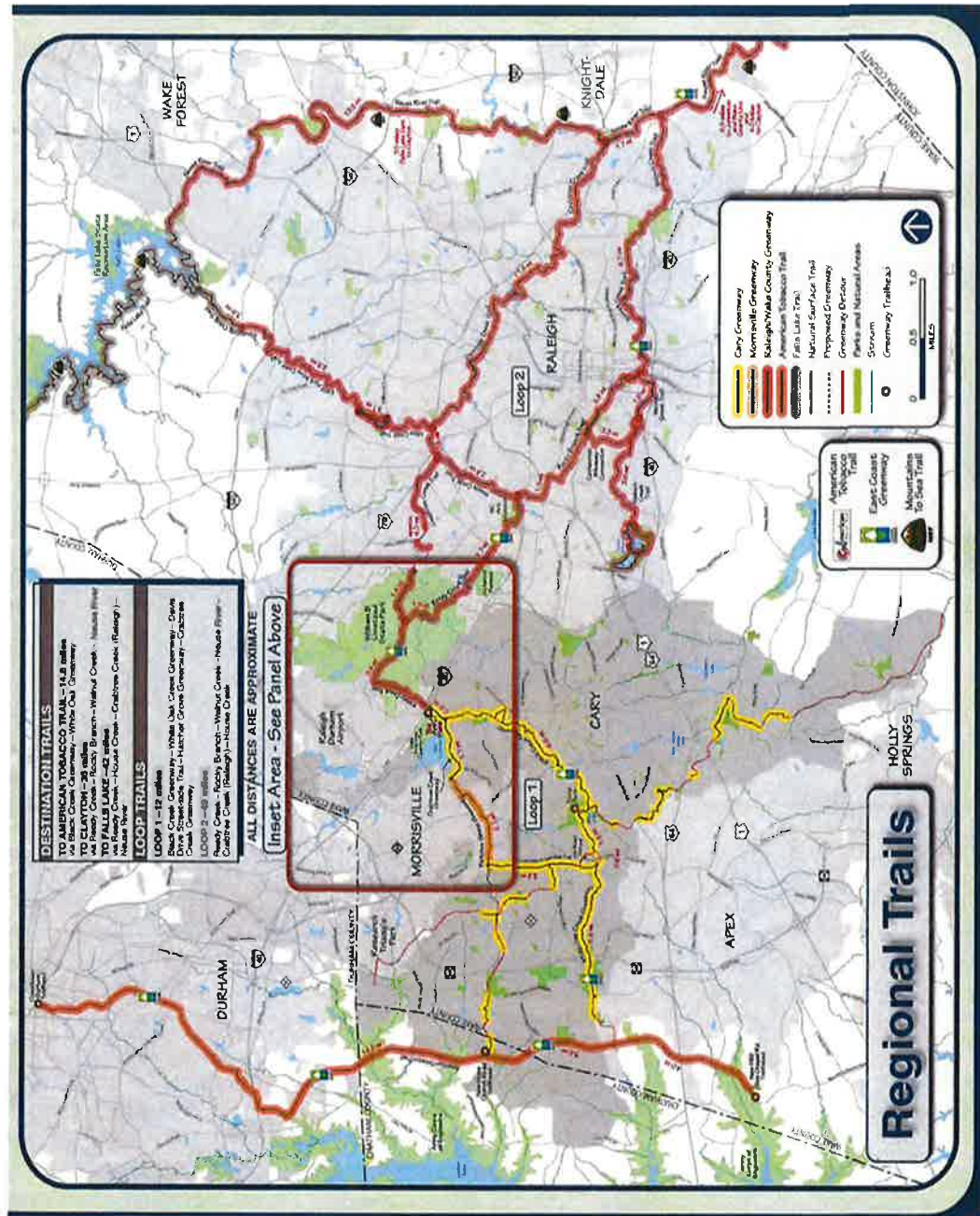
#### CAROLINA THREAD TRAIL

The Carolina Thread Trail is a planned regional trail network that spans 15 counties in western North Carolina and South Carolina. As of 2012, 100 miles of the trail are open for use and 14 corridors are being developed. County-level greenway plans have been completed for all 15 participating counties. These plans include recommendations for on-road walkways and bikeways in addition to off-street greenways and blueways. The CTT is a model project for regional trail planning coordination between local communities and partner organizations.

<http://www.carolinathreadtrail.org>

#### NEUSE RIVER GREENWAY

Part of the Mountains-to-Sea Trail, the Neuse River Greenway runs 33 miles from the base of Falls Lake Dam, through Raleigh and connecting to Clayton in Johnston County. The greenway is 33 miles in length making it the longest, continuous paved greenway in the state as of 2013. The greenway requires no street crossings.



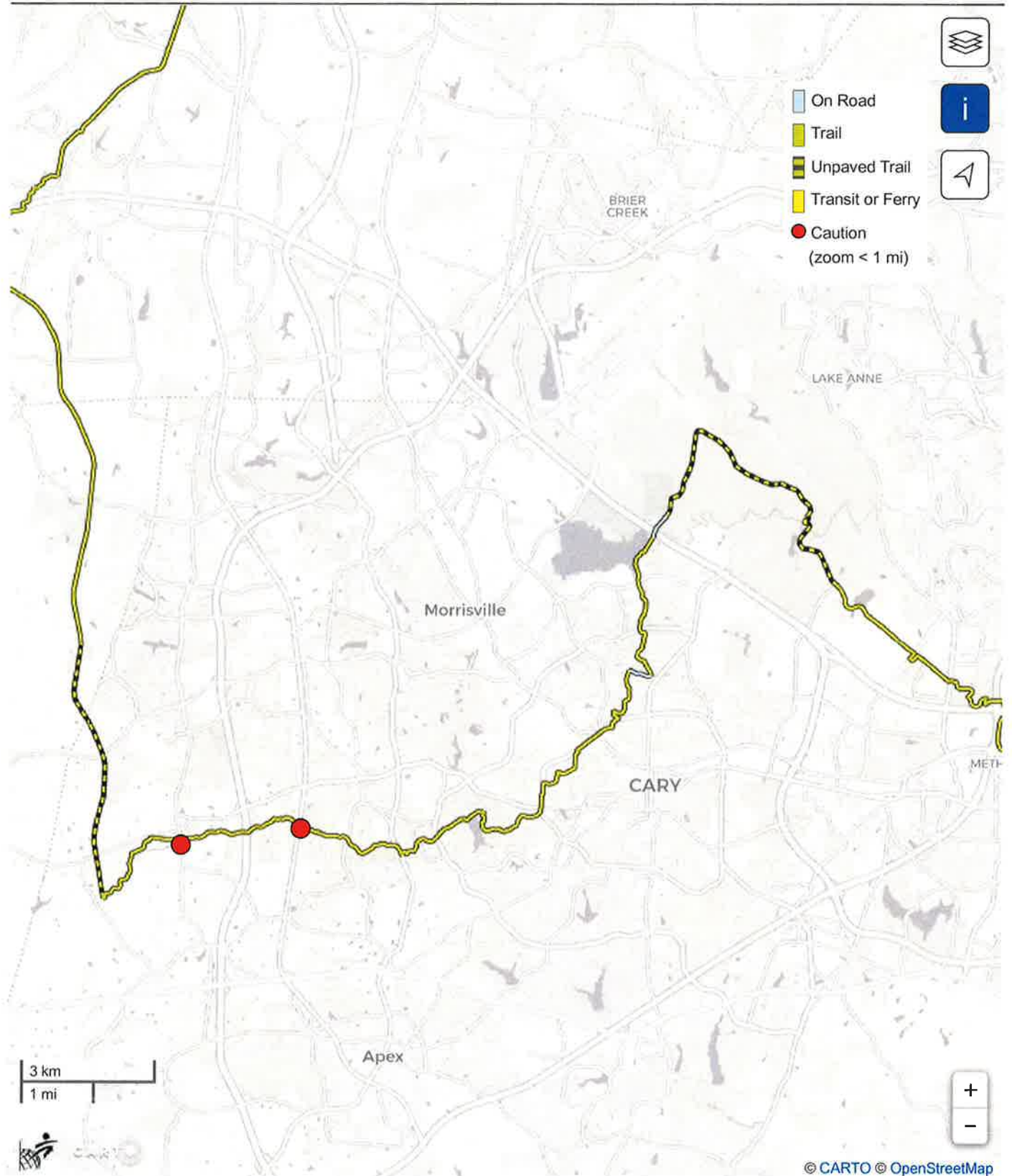
Old Reedy Creek Road links RDU, Raleigh, Cary, Durham, Wake County and other destinations (e.g., Reedy Creek Trail within Umstead State Park, Lake Crabtree Park, NC Museum of Art, Black Creek, Reedy Creek, House Creek, Rocky Branch, Walnut Creek, American Tobacco Trail, Crabtree Creek, and the Neuse Greenways. Also, the regional/national East Coast Greenway and US 1 (Carolina Connection) Bike Route.





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## OLD REEDY CREEK ROAD TRAILHEAD

### 2139 Old Reedy Creek Road



The trailhead is located on Wake County and Town of Cary property between the Lake Crabtree dam and Old Reedy Creek Road. It is the starting point for the Town's 7-mile Black Creek Greenway and an access point for the East Coast Greenway which runs west on Black Creek Greenway and east through Umstead State Park on Reedy Creek Greenway. These trails connect westward to White Oak Creek Greenway, and the American Tobacco Trail and eastward through Raleigh then southwards along the Neuse River. The trailhead also provides access to scenic Lake Crabtree overlooks, Wake County's mountain bike trails linking to Lake Crabtree County Park, and hiking and biking trails within the 5,000-acre Umstead State Park.

Note: The connection from the trailhead to Umstead State Park is 0.6 mile on Old Reedy Creek Road, which is gravel beyond the I-40 bridge. The Reedy Creek section of East Coast Greenway through Umstead State Park is paved with gravel/screenings, not asphalt.

### Features

- 82 parking spaces
- Restroom
- Trail connection to the end of the Black Creek Greenway and the East Coast Greenway
- Small non-reservable shelter with 3 tables and a grill
- Bike fix-it station with repair tools
- Drinking fountain with bottle filler and pet dish
- Kiosk with display maps of regional and local trail systems



**ROUTE:**

US 1 - Carolina Connection

**DISTANCE:**

200 Miles

**DIFFICULTY:**

Moderate/Difficult

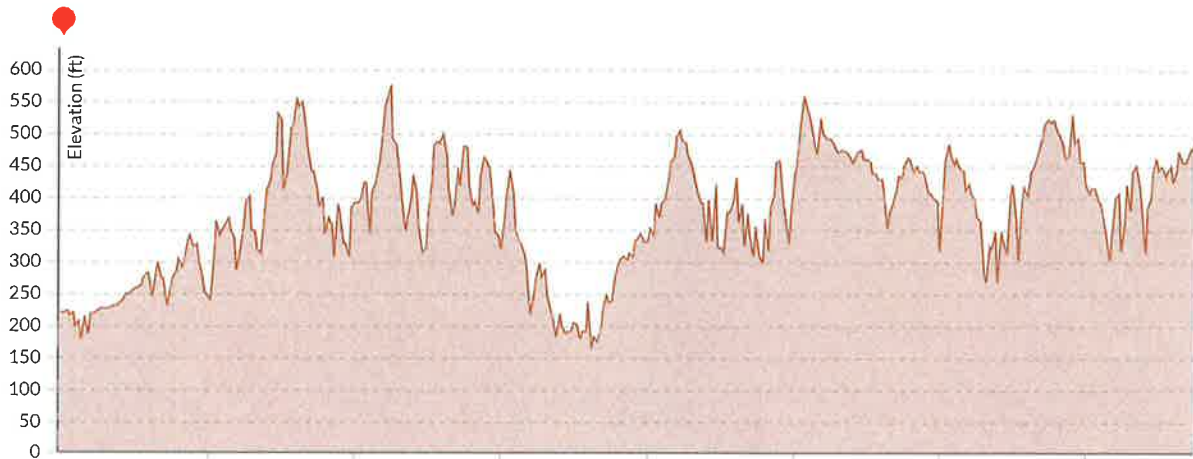
**START:**

Warren/Vance County border

**FINISH:**

Cape Fear River

**ELEVATION:**



Designated as a portion of US Bike Route 1, which runs from Maine to Florida, this route covers almost 200 miles of rolling terrain. It is the main north/south connector route through the central portion of North Carolina. From Virginia, this route enters North Carolina near the Warren / Vance County border. US 1 continues south between Raleigh and Durham and eventually through Sanford, Southern Pines, and Laurinburg before advancing into South Carolina.



**From:** [Anne Franklin](#)  
**To:** [RDUEA](#)  
**Subject:** Protect our irreplaceable forested space next to Umstead State Park  
**Date:** Monday, March 13, 2023 1:29:21 PM

---

RDUEA Chris Babb,

Raleigh/Durham is growing like crazy. We need all the dense green/forested land we can get or protect to balance the booming growth. Our heat islands are no longer islands. Recent studies show lots of bright red hot spots.

Please require that any mitigation for the RDU new runway be used to protect and add to Umstead Park.

] 7.9  
] 9.1

Kind regards, Anne S. Franklin  
200-410 S. Dawson St. Raleigh NC 27601

Anne Franklin  
[annesfranklin@mindspring.com](mailto:annesfranklin@mindspring.com)  
200-410 S. Dawson St.  
Raleigh, North Carolina 27601



**From:** [Ellen White](#)  
**To:** [RDUEA](#)  
**Subject:** Mitigation for streams and wetland impacts downstream of Umstead should be done on-site  
**Date:** Monday, March 13, 2023 2:42:40 PM

---

RDUEA Chris Babb,

Please help protect our beloved Umstead State Park from the ongoing threat by RDU and Wake Stone Quarry.

The millions of dollars in mitigation funds need to be used on or around our Park, to protect the streams and wetlands that flow directly into this sensitive and precious public land, and to increase the width of the buffers protecting it.

Umstead State Park is on the National Register of Historic Places and Land and Water Conservation funded by the National Park Service.

Umstead State Park belongs to all of us, and should be kept in pristine natural condition for future generations. And for all the precious animal and plant life that depend on keeping it that way.

Ellen White  
knobwhite24@gmail.com  
762 Mudham Rd  
Wendell, North Carolina 27591

} 9.1  
} 5.2

**From:** Gil Johnson  
**To:** RDUEA  
**Subject:** Environmental Mitigation - RDU  
**Date:** Monday, March 13, 2023 2:44:10 PM

---

RDUEA Chris Babb,

RDU is proposing extensive clearing as noted in 4.3.3.2 "The Proposed Action has the potential to remove up to 480 acres of forested area."

] 7.10

All stormwater for this project flows into and through Wm. B. Umstead State Park, to downstream communities. The EA report implies that all stormwater is somehow captured in the Brier Creek Reservoir, but it doesn't stay there, it then flows into Crabtree Creek and into the Park.

] 9.46

The report recommends extensive use of Mitigation Banks. It would be preferable to use those funds for on-site mitigation instead of simply making a payment to avoid on-site mitigation. The Mitigation Bank fees can be excessive and will not contribute to minimizing the environmental impacts of this project. Mitigation Banks should only be a last resort, not a means of buying one's way out of directly addressing environmental harm.

] 9.1

Thank you for your consideration.

Gil Johnson  
rgiljohnson@gmail.com  
8712 Silverthorne Drive  
Raleigh, North Carolina NC 27612

**From:** [William Doucette](#)  
**To:** [RDUEA](#)  
**Cc:** [Jean Spooner](#)  
**Subject:** RDU Runway EA Comments  
**Date:** Monday, March 13, 2023 3:09:00 PM  
**Attachments:** [Runway EA Comments 2023.pdf](#)

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CAUTION: This email attachment originated from a third party. Do not click links or open attachments unless you recognize the sender and know the content is safe.

William Doucette  
william8865@att.net

Comment and Critique of DRAFT RDU Runway Relocation Environmental Assessment, 2023

William H. Doucette Jr, PhD, LG

March, 2023

My critique assumes that the Proposed Alternative will be implemented as described in the Draft Environmental Assessment (EA). The EA describes the potential environmental impacts and commits RDU to mitigation measures expected to be employed when the runway is constructed. My comments are provided as a basis for improving the Proposed Alternative, recognizing adverse impacts to William B Umstead State Park and preventing other avoidable environmental impacts during runway construction. I will focus on Sections 3.0 Affected Environment and 4.0 Environmental Consequences and Mitigation Measures.

3.8 Affected Environment

William B Umstead State Park should be identified as sensitive to 55 DNL noise. Exhibit 3-10 fails to show Lake Crabtree County Park. Exhibit 3-11 Shows composite noise contours that are substantially different than noise levels shown in Exhibit 3-12 and Section 4.10 exhibits. The public needs a full explanation of these different representations of noise and the EA must be modified consistent with that explanation.

} 6.1  
1.5  
6.4

3.10 Noise

The applicable noise standard for William B Umstead State Park, previously identified as a sensitive area, is DNL 55 dB.

} 6.1

4.3 Biological Resources et al.

Unnecessary deforestation is a significance threshold and it is inconsistent the RDU Sustainability Policy (2023). It is not insubstantial to deforest 200 plus acres of forested public land to provide fill for the runway construction. Off-site sources of construction fill are readily available from rock quarries. Why clear-cut forested public land for fill when offsite fill is readily available and likely free?

} 2.9  
4.2

The EA employs a rather preposterous analysis (Appendix B) to reject off-site fill sources as too expensive and environmentally unsafe compared to a conveyor belt system that also uses the same truck and stockpile methods for placing fill and therefore has the same scale of

- stock pile erosion and sediment issues,
- air quality and stormwater compliance issues,
- staffing issues and
- deforestation/clearing.

} 4.4

The only difference in impacts will be the need to for more extensive track-out stations and there will be truck traffic on local roads leading from the quarry. Did the EA contractor perform a traffic analysis study?

} 4.5

The EA also implies that trucks leaving the construction zone will extensive cleaning. Other than gravel entrance BMP what is the basis for truck cleaning after dumping?

} 4.6



The EA technical Memo supporting the decision not to use off-set fill sources fails to disclose basic assumptions and logic to support the analysis as presented. For example an assumption gleaned from Table 1 is that Martin Marietta can handle no more than 150 trips per day (15 yds/truck) with 30 trucks. That comes to 5 round daily trips per truck! Not believable. I suggest the total duration in days to supply 1,750,00 yards from Martin Marietta Raleigh is no different from the on-site fill sources. An independent thorough analysis is needed to check these back of the envelope estimates if RDU wants to insist on fill from on-site sources

4.7

The EA analysis also speculated with no real foundation that there might not be sufficient trucks to transport off-site fill to the runway as reason to reject the off-site fill alternative.

4.8

Further the EA does not consider the net loss of property value or the substantial cost of mitigation for impacts to wetlands and streams once deforested and mined for fill.

7.11

The better choice for a source of fill is off-site both economically and environmentally. RDU should not destroy public water resources, wetland or stream buffer ignorer to supply fill for the runway.

4.7

4.5. DOT Section 4(f)

The EA incorrectly concludes the Proposed Action would not have a significant noise impact to William B Umstead State Park. As identified in comments below the EA employs an incorrect noise threshold for the State Park. This section must be rewritten to account for obvious 4(f) constructive use impacts to the park including cumulative impacts from foreseeable actions linked to the new runway.

16.4

The appropriate significant threshold for adverse noise effects on William B Umstead State Park as established by FAA and the State of NC is 55 DNL. The park should be identified as noise sensitive. All the exhibits in this section 4.10 and the noise analysis at appendix F must be modified to reflect the 55 DNL threshold on the park side of the airport. It is likely that both alternatives result in significant adverse effects on areas of the Park. Some of those impacts may be grandfathered from mitigation, but the effects are documented. This EA should properly document noise impacts to the park.

6.1  
6.9

4.9 Natural Resources and Energy Supply

Will the withdrawal of 150 million gallons of water from Brier Creek Reservoir have the potential to disturb and mobilize contaminated sediments into Lake Crabtree? The City of Cary's offer to supply water for hydro-compaction of fill is a better alternative in terms of risks and community relations.

9.7  
2.10

4.10 Noise

As noted in 4.5 comments above the EA incorrectly uses 65 DNL noise exposure level in reference to William B Umstead State Park instead of 55 DNL. All of the noise exhibits, text, and appendix must be revised to show 55 DNL.

6.1

4.12 Visual Effects

It may be true that the new runway itself could slightly reduce light emissions to Umstead Park, however, the new runway is integral to the reasonably foreseeable redevelopment of a greatly expanded general aviation campus on the north half of RDU (see table 4-26) that will increase light emissions as well as noise to the park. The correct analysis is that the proposed project

15.3

will enable increased light emissions to the park and thus is a cumulative adverse impact that must be appropriately documented in the EA.

} 15.3

4.13 Water Resource

The cost to use DEQ wetland banking or in lieu of fee programs for mitigation of wetland and stream impacts will be substantial, millions of dollars, not so trivial as to be ignored. All means to avoid impacts should be taken including the use of off-site fill sources. In addition RDU can establish a proprietary bank of its own to protect critical areas on RDU managed land such as expanded buffers to Little Brier Creek and Lake Crabtree County Park, buffers to other water resources and buffers to William B Umstead Park.

} 9.52

4.14 Cumulative Impacts

Contrary to the EA conclusion there are cumulative adverse impacts to William B Umstead State Park that will be enabled with the Proposed Alternative. Using the correct 55 DNL standard will demonstrate adverse impacts directly associated with the Proposed Alternative. The general aviation campus development shown in RDU's master plan will result in both new noise and light emission adverse impacts that should be addressed in the EA. In addition the new general aviation campus will usurp thousands go parking spaces that will be relocated to a newly expanded park and ride lot 3. Cumulative impacts from the expanded park and ride 3 will include noise and light emissions into Umstead Park and loss of another 80+ acres of forest.

} 6.1

} 15.3

Summary

This DRAFT EA concludes that there are no substantial environmental concerns with constructing the new runway compared to the "No Action" alternative. A close look at the analysis indicates that is not likely the case. New analysis and text revisions are necessary. The Proposed Alternative should be modified to substantially reduce deforestation and wetland/surface water impacts and acknowledge noise impacts to William B Umstead State Park.

} 1.20

} 2.3

**From:** Deb Good  
**To:** RDUEA  
**Subject:** Protect our irreplaceable forested space next to Umstead State Park  
**Date:** Monday, March 13, 2023 3:14:12 PM

---

RDUEA Chris Babb,

Dear RDU Airport Authority:

Please consider the below items before building a new runway that may not even be required (due to remote work acceptance & decreased business travel):

1. Require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.
2. Request the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.
3. The protective status of William B. Umstead State Park should be recognized (currently, the EA treats our Park similar to a soccer field, not the natural setting that we cherish as it's purpose), including the Park's:
  - a. Listing in the National Register of Historic Places, protecting its forested landscape Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
  - b. An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
  - c. Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
  - d. Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 9.1  
} 5.2

Thank you.

Deb Good  
dgood339@gmail.com  
105 WESTBANK CT  
CARY, North Carolina 27513-2210

**From:** Maple Osterbrink  
**To:** RDUEA  
**Subject:** Umstead State Park's Protected by LWCF funds by National Park Service  
**Date:** Monday, March 13, 2023 3:54:52 PM

---

RDUEA Chris Babb,

MY ask:

Use that mitigation funding directly to protect the forested protective buffers! (NOT to the 'slush fund!)

Additionally, because we are in the beginning of a long (forever) CLIMATE EMERGENCY, my groups want NO EXPANSION of runways, NO more parking places there [70,000 is OBSCENE! More busses & that commuter rail YOU should all be pushing for and fast]

It is pathetic IMO. RDU has a rule for expansion, so THAT should be rescinded!

Maple Osterbrink [declareemergency.org](http://declareemergency.org)

Maple Osterbrink  
maplemaryann@protonmail.com  
603 Martin Luther King Jr Blvd 1E, 1E  
Chapel Hill, North Carolina 27514

] 9.1  
] 8.4  
] 1.3  
] 2.11  
] 2.12

**From:** Laura McGuinn  
**To:** RDUEA  
**Subject:** Do the mitigation of Crabtree Creek and Umstead State Park on-site  
**Date:** Monday, March 13, 2023 4:06:04 PM

---

RDUEA Chris Babb,

The FAA should be mindful of the fact that the public overwhelmingly wants to protect William B. Umstead State Park. This unique treasure, deeply valued by locals and visitors to the area alike, is an irreplaceable oasis.

} 5.21

Please require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.

Please use the mitigation funds to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

} 9.1

Please recognize and respect the protective status of William B. Umstead State Park.

This includes the park being listed in the National Register of Historic Places, protecting its forested landscape.

Being protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance.

Being an historic property where the quiet, forested setting is recognized to be a key purpose and attribute.

Being protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina.

And being protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

} 5.2

The people of Raleigh, Cary and all over the Triangle recognize what an important haven William B. Umstead State Park is, for a wide variety of reasons to an incredibly diverse population. There is literally something for everyone at Umstead, as well as being such an invaluable wildlife habitat for an amazing range of flora and fauna, many species being sensitive and at-risk.

Thank you for your attention to these public comment.

Laura McGuinn

Laura McGuinn  
lauralovesparks@gmail.com

1605 Roanoke Street  
Raleigh, North Carolina 27606

**From:** [Judith Lechner](#)  
**To:** [RDUEA](#)  
**Subject:** Do the mitigation of Crabtree Creek and Umstead State Park on-site  
**Date:** Monday, March 13, 2023 4:12:58 PM

---

RDUEA Chris Babb,

Please protect the wetlands around Crabtree Creek and Umstead State Park. To do this, please use the mitigation of wetlands dollars on-site, rather than spending the money elsewhere.

] 9.1

Judith Lechner  
lechnjv@auburn.edu  
311 Oakland Ln  
Chapel Hill, North Carolina 27516-1609

**From:** Leo  
**To:** [RDUEA](#)  
**Subject:** No new runways!  
**Date:** Monday, March 13, 2023 4:39:00 PM

---

Please require RDUAA to spend its required stream and wetland mitigation funds to protect Crabtree Creek and William B. Umstead State Park, and NOT just pay into a mitigation fund that goes somewhere else - those funds should be used to protect the water resources that are directly impacted.

No additional runways, no gigantic parking lots. Instead improve transportation. crabtree Creek and Umstead State Park would be good recipients of the benefits of millions proposed for the awful expansion.

Thank you,  
Leo Briere  
Durham, NC

} 9.1  
] 1.21



**From:** Matthew Carson  
**To:** RDUEA  
**Subject:** Do not divert the mitigation funds off-site from the state park  
**Date:** Monday, March 13, 2023 5:00:12 PM

---

RDUEA Chris Babb,

To FAA:

Please require that mitigation for stream and wetland impacts be used on-site and/or adjacent land to William B. Umstead State Park.

The mitigation funds should be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

The protective status of William B. Umstead State Park should be recognized:

- Listing in the National Register of Historic Places, protecting its forested landscape Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

Sincerely,  
Matthew T. Carson

Matthew Carson  
mtrentcarson@outlook.com  
501 Merrie Rd.  
Raleigh, North Carolina 27606

} 9.1  
} 5.2

**From:** Rachael Wooten  
**To:** RDUEA  
**Subject:** Recognize Umstead State Park's Protective Status during your development  
**Date:** Monday, March 13, 2023 5:18:33 PM

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RDUEA Chris Babb,

I am writing with several urgent concerns about Umstead Park with regards to the new runway at RDU, and the current Draft Environmental Assessment:

Do not divert those millions of dollars in mitigation funds off site, as Crabtree Creek and William B. Umstead State Park are water resources most impacted. Mitigation for stream and wetland impacts must be done on-site and/or adjacent land to William B. Umstead State Park. This is appropriate because the lands managed by the RDUEA either drain directly or indirectly (through Brier and Crabtree Creek) into William B. Umstead State Park.

Mitigation funds must be used to increase the width of forested protective buffers to protect William B. Umstead State Park's border and its sensitive drainage ways around the Park's borders.

Please recognize and honor the protective status of William B. Umstead State Park, including:

1. Listing in the National Register of Historic Places, protecting its forested landscape.
2. Protection under U.S. DOT Section 4(f) as a publicly owned part with State and National Significance.
3. This is an historic property where the quiet, forested setting is recognized to be a key purpose and attribute for everyone who visits the site.
4. Protection guaranteed by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina.
5. Protection by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

Rachael Wooten  
rachaelwootenauthor@gmail.com  
2721 Kittrell DR.  
Raleigh, North Carolina 27608

9.1

5.2

**From:** [Brittany Quinn](#)  
**To:** [RDUEA](#)  
**Subject:** Draft Environmental Assessment for the proposed Runway 5L/23R Replacement Project  
**Date:** Monday, March 13, 2023 6:21:32 PM

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Please acknowledge;

The streams and wetlands affected by the new runway drain into Brier Creek, Brier Creek Reservoir, Lake Crabtree, Crabtree Creek and then into William B. Umstead State Park. Thus, downstream protection should be the priority for the millions of dollars in mitigation funds. Also, RDU could offset these millions of dollars that they will for certain incur by releasing land such as Odd Fellows, Lake Crabtree County Park, 286 East, and the buffer area for 286 West to the NC State Park System and/or Wake County.

9.1

Please ask the FAA to:

Require that mitigation funds for stream and wetland impacts be used on-site (at the Airport) and/or on land adjacent to William B. Umstead State Park (e.g., Lake Crabtree County Park, 286 East, 286 West, 286 North, Haley’s Branch, Odd Fellows).

Request the mitigation funds be used to increase the width of forested protective buffers to protect William B. Umstead State Park’s border and its sensitive drainage ways around the Park’s borders (e.g., This could include offsetting the cost of the penalty incurred by RDU by releasing land to the NC State Park System and/or Wake County. This includes Odd Fellows, Lake Crabtree County Park, 286 East, and the buffer area for 286 West to the NC State Park System and/or Wake County.)

Please ask that the EA, RDU, etc. recognize the protected status of William B. Umstead State Park. Currently, the EA treats Umstead State Park similar to a soccer field, not the natural setting that we cherish.

Umstead State Park is:

- Listed in the National Register of Historic Places, protecting its forested landscape
- Protected under U.S. DOT Section 4(f) as a publicly owned park with State and National Significance
- An historic property where the quiet, forested setting is recognized to be a key purpose and attribute
- Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina
- Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.

5.2

**From:** [Joseph Huberman](#)  
**To:** RDUEA  
**Subject:** Recognize Umstead State Park's Protective Status during your development  
**Date:** Monday, March 13, 2023 6:24:26 PM

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RDUEA Chris Babb,

We hike in Umstead Park to wipe away the stress of the city. Hiking off trail along the river allows me to connect with nature and myself. It is very important to maintain wide buffers along the park borders and to protect the quality of the streams. Whatever mitigation funds are available should be used to improve the streams entering and alongside the park.

} 9.1

Joseph Huberman  
joseph@treklite.com  
904 Dorothea Drive  
Raleigh, North Carolina 27603

**From:** [nlew@mindspring.com](mailto:nlew@mindspring.com)  
**To:** [RDUFA; PublicComment@rdu.com; Nina.szlosberg-Landis@rdu.com; ellis.hankins@rdu.com](#)  
**Cc:** ["Wiley Nickel"; darryl.childers@nc.gov; contactgov@nc.gov; tommy.dupree@faa.gov; white.douglas@epa.gov; renee.gledhill-earley@ncdcr.gov; ramona.bartos@ncdcr.gov; reid.wilson@ncdcr.gov; brian.strong@ncparks.gov; scott.letchworth@ncparks.gov; csnow@wake.gov](#)  
**Subject:** RDU EA public comment: selected alternative is NOT reasonably consistent with existing plans of public agencies responsible for development in the Airport area  
**Date:** Monday, March 20, 2023 9:41:36 AM  
**Attachments:** [Public Comment on draft EA for new runway\\_RDUAA plans not consistent with prior public agency plans\\_nlew\\_2023 03 20\\_signed.pdf](#)

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**CAUTION:** This email attachment originated from a third party. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Please accept this late, but important, public comment regarding the RDU Environmental Assessment (EA) for the new runway in good faith. The comment period for the Environmental Assessment (EA) for the new runway at RDU occurred at an extremely inconvenient time. There were 3 hearings regarding the RDU-Wake Stone rock quarry on Odd Fellows in Feb/2023. This, in addition to my regular job and knee surgery, hampered my efforts to read this EA and to submit public comments.

-Natalie

Public Comment on the daft (28/Feb/2023) "Environmental Assessment, Proposed Runway 5L/23R Replacement Project"

The comment period for the Environmental Assessment (EA) for the new runway at RDU occurred at an extremely inconvenient time. There were 3 hearings regarding the RDU-Wake Stone rock quarry on Odd Fellows in Feb/2023. This, in addition to my regular job and knee surgery, hampered my efforts to read this EA and to submit public comments. Please accept this comment in good faith.

Page 1-29 of the daft (28/Feb/2023) "Environmental Assessment, Proposed Runway 5L/23R Replacement Project", Section 1.7 (Requested Federal Actions) indicates that "... the Airport Authority requires the following approvals from the FAA and USACE before it can implement the Proposed Action." One of the requirements listed is "Determination...that the selected alternative is reasonably consistent with existing plans of public agencies responsible for development in the area." **There are several existing plans of public agencies responsible for the development in the RDU area that are being ignored.** These plans are older, but that does not decrease or eliminate their significance. They should not be swept under the rug. These plans include 1) the Crabtree Creek Watershed Project that started in the mid-1950's, 2) Wake County's parks and recreation plans associated with the Crabtree Creek Watershed Project, and 3) the NC State Park's plans for protection of The William B. Umstead State Park. All of these plans pre-date not only this proposed runway expansion, but they pre-date many other RDUAA expansion plans. Historically, these plans have been ignored. They must be brought to light and past RDU actions that have harmed these plans should be rectified.

1.22

Per statements made at the RDUAA meeting on 16/Mar/2023, the new runway is tied to the Terminal 2 Landside Expansion Program and the Terminal 2 Landside Expansion Program "cannot begin until the first phase of the Park Economy 3 (PE3) Expansion project is completed." Thus, these projects are all tied together! Given that the PE3 project area is partially included in the General Study Area for the new runway and how intimately the PE3 expansion is tied to the actual implementation of the runway project, the PE3 expansion should be included in the new runway EA. To not do so is project segmentation.

2.13

In addition to the PE3 expansion area being partially included in the General Study Area for the new runway project, the other parking lots off of National Guard Drive are included in the General Study Area for the new runway project. Basically, RDUAA plans to deforest all land between National Guard Drive and Umstead State Park. The deforestation for these surface parking lots affects Haley's Branch Creek which drains into The William B. Umstead State Park via Lake Crabtree. These parking lot projects are related to the new runway project as they are related to the main parking garage, new rental car facility, and PE3 expansion. These projects need to be included into this EA. To not include these projects is project segmentation.

2.14

NC State plans for the protection of The William B. Umstead State Park

Neither the new runway nor the PE3 expansion project are consistent with the existing State plans for the protection of The William B. Umstead State Park. Both negatively affect the Park in several ways. The water from Lake Crabtree contains Airport runoff from at least two directions: Brier Creek (from the new runway) and Haley's Branch Creek (from the PE3 expansion). Lake Crabtree drains directly into The William B. Umstead State Park. The forested areas of 286 and Odd Fellows are needed to provide critical water filtration and noise and light buffer to Umstead State Park. RDUAA would like to segment the PE3 project away from the runway expansion to avoid Section 4(f) and Section 6(f) issues (both of which are applicable to Umstead State Park). These projects are related and should be assessed as one.

2.15  
2.53  
2.16

The approximate location of I-40 was known in the mid-1930's as demonstrated by the fact that I-40 is shown tax maps from that era. The Park has a stated goal of expanding the boarder to I-40 for the purposes of protecting the Park. This expansion was and still is parallel to the flow of the Airport. Specifically, Odd Fellows and the 286 area have been on the Park acquisition list since 1935. Below is one example.

5.22

Public Comment on the draft (28/Feb/2023) "Environmental Assessment, Proposed Runway 5L/23R Replacement Project"

U.S. DEPARTMENT OF AGRICULTURE  
 AGRICULTURAL ADJUSTMENT ADMINISTRATION  
 DIVISION OF PROGRAM PLANNING  
 Land Policy Section

SUMMARY OF LANDS IN PURCHASE AREA RECOMMENDED FOR PURCHASE—Continued

Sheet No. 8 Date June 11, 1935

State North Carolina Proposal No. Na. C. R-1

TRACT No.	OPTION No.	OWNER	ACRES	APPRAISED VALUE				OPTION PRICE		
				Land	Timber	Improvements	Total	Per acre	Per acre	Total
19A	19A	Rufus N. Brown, Sgt.	88	\$ 216.	\$	\$ 75.	\$891.	\$ 11.64	\$ 11.	\$276.00
20	20	W. B. Murdock	137	1220.	200.	50.	1470.	10.73	10.	1370.00
21	21	Paul Klein <i>Odd Fellows</i>	70	1050.			1050.	15.	15.	1050.00
							1005.	14.5	14.	1680.00

In North Carolina, from the mid 1920's to the early 1970's, the NC Department of Conservation and Development (C&D) was charged with managing multiple departments including Commerce and Industry, Mineral Resources (aka mines), Parks, and more. Because so much was housed under this one Department, members of C&D were able to orchestrate development in NC to their preference, thus creating conflict of interest. This conflict-of-interest led to the Airport taking management control of land on the Park's acquisition list.

1964 letter from an NC State Professor to the Governor of NC:

The Parks System need strengthened support on the Board of Conservation and Development. The system needs this support in order to counter the apparent tendency of the Department of Conservation and Development to emphasize development and to subordinate conservation. It needs this

In the 1960's, the RDUAA was colluding with the NC C&D to take actual Park land. They initially kept the runway expansion plans hidden from the public. Thankfully, that plan failed. In addition, the past staff of the RDUAA and NC Department of Conservation & Development knew of the Park's plans to expand towards I-40 (parallel to the Airport) and used their access to federal money to take control of the 286. As documented in multiple locations, RDUAA had plans to "aggressively" pursuing taking all land between the Park and the Airport even though the Airport was expanding to the side away from the Park. This philosophy led RDUAA to also take management control of the Odd Fellows, the most critical tract for the Park. In several documents, land adjacent to the Park is clearly described as not needed for Airport expansion.

1.18

Thus, historically, the RDUAA expansion plans have ignored the plans of the State Park System to expand peacefully towards I-40 and parallel to the Airport flow. The new runway and segmentation of the parking projects off of National Guard Drive from the new runway project continue this bad history.

**Crabtree Creek Watershed Project and Wake County's parks and recreation plans**

Neither the new runway nor the PE3 expansion project are consistent with the existing plans of the federally, state, and locally funded Crabtree Creek Watershed Project that started in the mid-1950's or for Wake County's historical plans to use the Crabtree Creek Watershed Project sites as recreational areas. The goal of the Crabtree Creek Watershed Project was to control flooding. But, from inception of the Crabtree Creek Watershed Project flood control project, recreational use of the areas affected by this project was acknowledged. In the 1970's, Wake County solidified the concept of using these areas for recreation by resolution: "Whereas, in connection with the Crabtree Creek Watershed Project, the Wake County Commissioners by resolution have designated the watershed sites as public recreation lands in order to provide a secondary use of and realized additional benefits from these properties, and accordingly have directed the Wake County Parks and Recreation Department to proceed with planning for recreational development and use of these lands..."

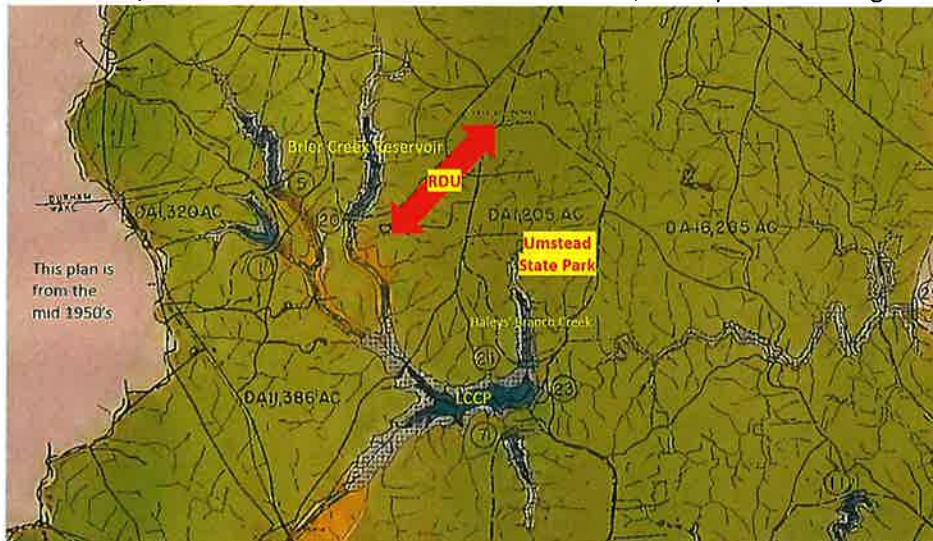
1.23



Public Comment on the draft (28/Feb/2023) "Environmental Assessment, Proposed Runway 5L/23R Replacement Project"

Two significant structures from the Crabtree Creek Watershed Project are affected by the RDU Airport – structure #20 that created the Brier Creek Reservoir and structure #23 that created Lake Crabtree. Wake County. See the map from the July 1963 Crabtree Creek Watershed Work Plan, US Department of Agriculture.

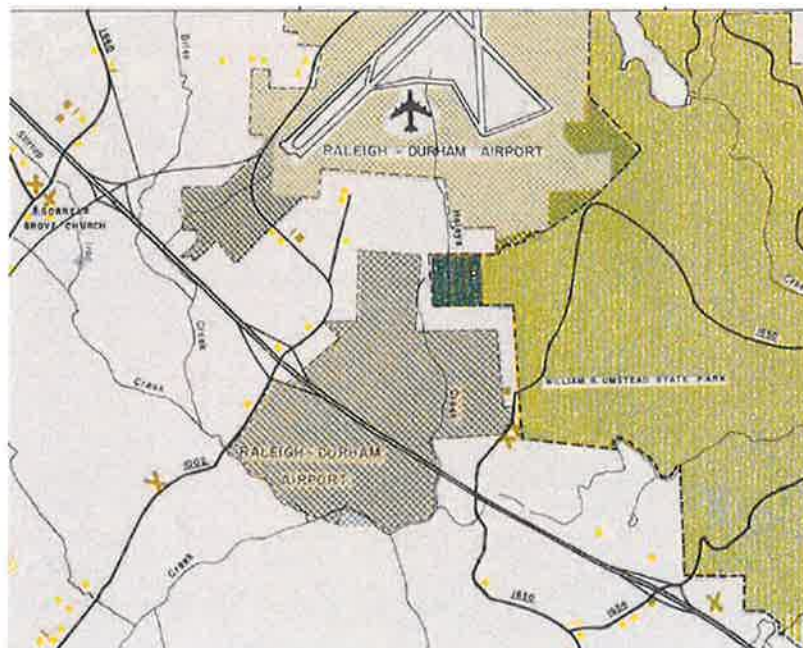
9.54



RDUAA's plans for the new runway totally eliminate any chance of using the Brier Creek Reservoir for recreation. In addition, given the plans of using that area for borrow dirt for the new runway, the chances of that area benefiting the public in any manner is eliminated.

9.55

Wake County wanted to purchase land for Lake Crabtree County Park in the early 1980's. This is consistent with the goals of both the Crabtree Creek Watershed Project and Wake County Parks and Recreation. But the person who worked for the NC Department of Conservation and Development (C&D) who orchestrated RDUAA taking management control of these lands in the late 1960's was now the head of the RDUAA Land Committee. This person was a developer and used his political position, personal connections, and RDUAA's access to federal money to guide control of land in the favor of the developer's and the RDUAA's interest even though he knew of the State and County plans that existed before the Airport decided to expand. This is not ethical. His positions also created a conflict of interest.





Public Comment on the draft (28/Feb/2023) "Environmental Assessment, Proposed Runway 5L/23R Replacement Project"

Now, RDUAA wants to turn Wake County's most used Park, Lake Crabtree County Park, into an office park. Wake County has spent millions of dollars in creating a park at Lake Crabtree. RDUAA claims that Wake County only pays a minimal amount each year to lease the land, but RDUAA fails to acknowledge that Wake County paid for a water line to the Airport area as part of the lease. In addition, RDUAA fails to acknowledge that Wake County also paid for sewer lines and the access road to the Lake Crabtree lands.

1.24  
1.25

NORTH CAROLINA  
COUNTY OF WAKE

AGREEMENT FOR CONSTRUCTION  
OF A WATER LINE AND  
LEASE OF LAND

THIS AGREEMENT, made and entered into this 5<sup>th</sup> day of March, 1985, by and between the COUNTY OF WAKE, a political subdivision of the State of North Carolina, hereinafter referred to as the "County," and the RALEIGH-DURHAM AIRPORT AUTHORITY, a public body chartered by the General Assembly of North Carolina under Chapter 168 of the 1939 Public-Local Laws, as amended, hereinafter referred to as the "Authority."

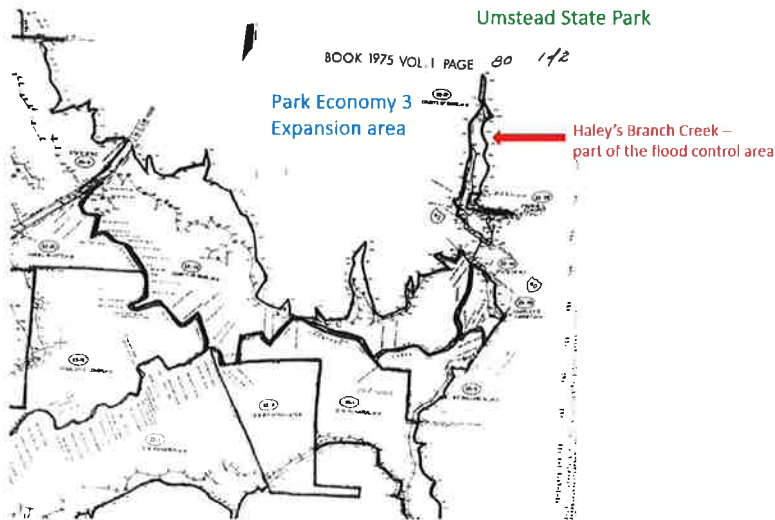
To compensation for the loss of publicly funded Brier Creek Reservoir subsequent to the plans related to the new runway, Lake Crabtree County Park (including all land as of now) must be left intact forever.

As acknowledged in the draft EA, all of the water from the new runway drains into the Brier Creek Reservoir. It is important to acknowledge also that the water from Brier Creek Reservoir then runs into Lake Crabtree via Brier Creek. It does not end there! All of the water from the proposed Park Economy 3 expansion drains into Haley's Branch Creek which is a documented part of Site #23 of the federally, state, and locally funded Crabtree Creek Watershed Project. Haley's Branch Creek runs directly into Lake Crabtree. So, Lake Crabtree, the lake created by federal, state, and local funds is affected by Airport projects from multiple directions. The cumulative effect must be accounted for in the EA! Thus, the PE3 expansion must be included in the EA.

1.26

SITE 23  
CRABTREE CREEK WATERSHED PROJECT

WAKE COUNTY DEPARTMENT OF NATURAL RESOURCES



Public Comment on the draft (28/Feb/2023) "Environmental Assessment,  
Proposed Runway 5L/23R Replacement Project"

Conclusion:

- 1) The current runway expansion project is NOT reasonably consistent with existing plans of public agencies responsible for development of the Airport area ] 1.22
- 2) The PE3 expansion project is related to the new runway project and should not be segmented out of the new runway expansion project ] 1.27
- 3) The PE3 expansion project and all parking projects along National Guard Drive must have a full environmental assessment not only because these projects are NOT reasonably consistent with existing plans of public agencies responsible for development of the Airport area, but because the Airport was able to take management control of these lands given their access to federal money. ] 1.28

The public wants a great Airport, but not at the expense of the publicly funded Lake Crabtree County Park and Umstead State Park. ] 1.29

**From:** Patrick Masavage  
**To:** RDUEA  
**Subject:** Enough to Parking Lot. Don't Invest in Parking Lot Economy 3. Invest in Mass Transit  
**Date:** Saturday, April 1, 2023 3:57:13 PM

} 1.3

RDUEA Chris Babb, RDU EA,

I am writing to express my concern about the proposed expansion of Park Economy 3 and its impact on the surrounding natural community assets. As an Eagle Scout and lover of the outdoors, and a proponent of ethical enterprise, I appreciate the energy for expansion but not at the cost of the nature that inspired me to stay here.

} 1.3

I believe that the process of designing and implementing the expansion should be transparent to the public. The visitors to the Umstead State Park and the East Coast Greenway will be directly impacted by this expansion, and their opinions and input should be taken into consideration. Therefore, I urge the RDUAA to be more transparent with their processes and involve the public in the decision-making process.

} 1.14

} 1.14

I also urge the RDUAA to implement meaningful, two-way dialog on the design of all phases of the expansion of Park Economy 3. The public should be able to provide feedback and suggestions, and their concerns should be addressed and taken into account.

} 1.3

Furthermore, I strongly suggest that alternative areas for development be considered, such as on the other side of National Guard Drive or Aviation, or even on the other side of the airport. The design and location options should be evaluated with public input.

} 1.3

I also want to stress the need for wide buffers along Umstead State Park and the East Coast Greenway to protect these irreplaceable natural community assets. Any parking expansion should be designed to prevent further harm to the park and the recreation corridor.

} 5.4

Lastly, I would like to draw attention to RDU's poor stormwater retention measures and the negative impact of the airport as a major Urban Heat Island. Instead of investing in even more parking lots, I urge the RDUAA to consider investing in mass transit by having dedicated buses that bring people to and from the airport, contributing less to noise and air pollution in the Triangle.

} 1.15

} 1.3

In conclusion, I hope the RDUAA will take these concerns and suggestions into consideration when making decisions about the expansion of Park Economy 3. The natural community assets are precious, and we should do everything we can to preserve them.

} 1.3

Patrick Masavage  
plmasavage@smcm.edu  
10210 Strome ave  
Raleigh, North Carolina 27617

## J.2 Responses to Comments Received

The Airport Authority and the FAA prepared responses to the comments received on the Draft EA. **Table J-2** presents each major topic, the comment summary number, the summary comment, and the response.

**TABLE J-2, RESPONSE TO DRAFT EA COMMENTS**

COMMENT #	SUMMARY OF COMMENT	RESPONSE
<b>1</b>	<b>GENERAL COMMENTS</b>	
1.1	The commenter supported the Proposed Action.	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.
1.2	The comment was not related to the Proposed Action or the Draft Environmental Assessment (EA).	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.
1.3	The comment was referring to Parking Lot Economy 3 Expansion Project (PE3) (including having a transparent public outreach process with two-way dialogue, concerns pertaining to alternative development, use of buffers for the parking lot, parking lot increasing urban heat island, inadequate stormwater retention measures, and greater consideration of mass transit options).	The Park Economy 3 Expansion Project (PE3) is not an element of the Proposed Action being considered in the EA. The FAA reviewed the PE3 expansion project and determined that, due to Section 163 of the FAA Reauthorization Act of 2018, it did not have regulatory authority over this project. Because the FAA does not have regulatory authority, the FAA does not have an action subject to the National Environmental Policy Act (NEPA). The Airport Authority must still comply with other environmental laws and regulations as applicable. The PE3 Expansion Project was considered in this EA in the evaluation of cumulative impacts. See Chapter 4, Section 4.14 Cumulative Impacts. No revisions to the Draft EA were necessary to respond to this comment.
1.4	Generally, against the Proposed Action / Airport Expansion.	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.
1.5	Exhibit 3-10 fails to show Lake Crabtree County Park.	Exhibit 3-10 was revised in the Final EA to show the location of Lake Crabtree County Park. The location of Lake Crabtree County Park is on airport property that is being leased to Wake County. In addition, applicable exhibits in Chapter 4 Environmental Consequences and Mitigation Measures were also revised to show the location of Lake Crabtree County Park.
1.6	The commenter had no comment after review of Draft EA.	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.
1.7	The State Clearinghouse commented that the Draft EA has been submitted to the State Clearinghouse under the provisions of the National Environmental Policy Act and	Comment noted. The EA meets the provisions of the State Environmental Policy Act. No revisions to the Draft EA were necessary to respond to this comment.

RALEIGH-DURHAM INTERNATIONAL AIRPORT  
 ENVIRONMENTAL ASSESSMENT FOR THE  
 RUNWAY 5L/23R REPLACEMENT PROJECT

COMMENT #	SUMMARY OF COMMENT	RESPONSE
	<p>according to General Statutes 113A-10, when a state agency is required to prepare an environmental document under the provisions of federal law, the environmental document meets the provisions of the State Environmental Policy Act.</p>	
1.8	<p>The Environmental Protection Agency (EPA) commented that it has not identified any significant environmental impacts from the Proposed Action that would require substantive changes to the EA.</p>	<p>Comment noted. No revisions to the Draft EA were necessary to respond to this comment.</p>
1.9	<p>We are graced with important, undeveloped land around the airport, many, many hundreds of acres of which are now threatened by development related to airport needs and desires.</p>	<p>Comment noted. The Proposed Action would remove up to 480 acres of forested area on Airport property. As discussed in Chapter 1, Section 1.5 Need for Proposed Action, there is a demonstrated need to reconstruct Runway 5L/23R and to maintain RDU's existing infrastructure and operational capabilities. The cumulative impacts of the Proposed Action are included in Chapter 4, Section 4.14, Cumulative Impacts. No revisions to the Draft EA were necessary to respond to this comment.</p>
1.10	<p>Our concern regarding the runway issue is that it be done as responsibly as possible.</p>	<p>Comment noted. The Airport Authority prepared the Airport's Vision 2040 Master Plan (Master Plan). The Master Plan identified a number of deficiencies (needs) that exist at RDU and identified a number of projects that would be needed to accommodate future aviation demand throughout the planning period (through 2040) that would maintain safety and be responsive to the needs of the communities served by the Airport, maximize revenue-generating opportunities while effectively managing land uses and development, and optimize Airport infrastructure and resources in an operationally, financially, and environmentally sustainable manner. The Airport Authority, the FAA, and the USACE reviewed various alternatives and went through a deliberative process to identify the Proposed Action so that the project would be designed/ built/ and operated in a responsible manner. No revisions to the Draft EA were necessary to respond to this comment.</p>
1.11	<p>I have asked to be on (Airport) committees and have been told that I can read about it when I come to the meetings. I think they should have on their committees and advisory</p>	<p>The FAA is the lead federal agency to ensure compliance with the National Environmental Policy Act (NEPA) for this project and has the discretion to determine the appropriate level of public</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
	<p>committees... people who are contingent to the airport on both ends. (People) should be able to have a voice and how things are prepared ahead of the game, rather than ... find(ing) out about it, and then you're asked, "Do you want to say anything about it?"</p>	<p>involvement. See Chapter 5 Coordination and Public Involvement. The coordination and public involvement for this project comply with public involvement requirements and policies including NEPA, as amended, Council on Environmental Quality (CEQ), Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §§ 1503.1(a) and 1506.6), FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions. No RDU Airport advisory committees were formed as part of the EA process. However, the FAA conducted public involvement activities that were done to consult effectively with the public about their views, concerns, and ideas regarding the EA, the NEPA process and, the adequacy of the EA environmental analyses. No revisions to the Draft EA were necessary to respond to this comment.</p>
1.12	<p>The Airport Authority have already decided they want to put an eight-foot chain link fence with three strands of barbed wire to fence in my yard to protect it. That I think has been put on hold, but it's still on the Airport Layout Plan (ALP). It's still in the budget plans. It's called perimeter fencing.</p>	<p>There is currently a security fence located northwest of the existing airport perimeter road adjacent to Runway 5L/23R. The perimeter road in this location is not a public road but provides the Airport Authority vehicle access within the security fence for Airport maintenance and security purposes. The Proposed Action would relocate this security fence in kind around the proposed relocated runway and the relocated airport perimeter road. There are no residences located in this area.</p> <p>The Airport Authority identified a long-term plan as part of the Master Plan Vision 2040 to understand conceptually how the Airport may develop into the future. The future ALP depicts a full Airport perimeter fence around the southeast border of Airport property. The full Airport perimeter fence is not part of the Proposed Action.</p> <p>Not all of the elements shown in the Master Plan Vision 2040 and on the FAA conditionally approved ALP are ready to be implemented, including the potential full Airport perimeter fencing. If implemented, a full Airport perimeter fence would enhance security and keep trespassers off the Airport property.</p>

RALEIGH-DURHAM INTERNATIONAL AIRPORT  
 ENVIRONMENTAL ASSESSMENT FOR THE  
 RUNWAY 5L/23R REPLACEMENT PROJECT

COMMENT #	SUMMARY OF COMMENT	RESPONSE
		<p>The potential fencing requires additional planning by the Airport Authority and review by FAA before it is considered reasonably foreseeable. For NEPA studies, only projects that are reasonably foreseeable undergo project level evaluation and environmental approval. In addition, not all projects depicted in the ALP will require environmental review under NEPA, pursuant to Section 163 of the FAA Reauthorization Act of 2018. A description of Section 163 of the FAA Reauthorization Act of 2018 is in Chapter 1 Section 1.2 Background Information. The required level of environmental evaluation, however, is determined solely by the FAA.</p>
1.13	<p>This is an important decision that the Federal Aviation Administration (FAA) needs to make for Raleigh-Durham, and I hope that Raleigh-Durham Airport Authority will listen to the current citizens who have said for years this is too much.</p>	<p>Comment noted.</p>
1.14	<p>The process should be transparent to the public.</p>	<p>The coordination and public involvement for this project comply with public involvement requirements and policies including NEPA, as amended, Council on Environmental Quality (CEQ), Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] §§ 1503.1(a) and 1506.6), FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, NEPA Implementing Instructions for Airport Actions. See Chapter 5 Coordination and Public Involvement. At the beginning of the EA process, a public website (<a href="https://www.airportprojects.net/rdu-ea/">https://www.airportprojects.net/rdu-ea/</a>) was developed to keep the general public informed about the EA, the NEPA process, and opportunities for public participation during the EA process in an effort to be transparent to the public. No revisions to the Draft EA were necessary to respond to this comment.</p>
1.15	<p>Raleigh-Durham International Airport (RDU) is a major Urban Heat Island and has poor stormwater retention measures. RDU is already a huge heat island contributor to the area, which will be exacerbated by the conversion of green space to pavement.</p>	<p>Comment noted. According to USEPA, heat islands are urbanized areas that experience higher temperatures than outlying areas. Structures such as buildings, roads, and other infrastructure absorb and re-emit the sun's heat more than natural landscapes such as forests and water bodies. The Proposed Action would increase the impervious surface at the</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
		<p>Airport. As part of the Proposed Action at least 100 feet of vegetation and trees at the borrow sites would remain in place as a buffer. The areas within the 100 foot buffer for truck access will be replanted with trees of similar species to either side of the access, after removal of the borrow material from the borrow site. In addition, after vegetation and trees are removed and the fill material is excavated, the area would be graded and planted with appropriate native species ground cover vegetation approved by NCDEQ to prevent erosion.</p> <p>Urban heat islands may contribute to local climate change. The impacts from urban heat islands and global climate change are often similar. See Chapter 4 Section 4.4 Climate for a discussion of climate. An element of the Proposed Action provides additional drainage infrastructure for additional impervious pavement areas associated with the relocated runway. Existing stormwater drainage pipes would be replaced/rehabilitated under the existing runway and connected to new infrastructure for the relocated runway. Existing stormwater retention areas would be modified and or increased and new stormwater retention areas added as needed to maintain storage and accommodate increases in peak stormwater runoff. A graphic and additional text was added to the Final EA in Chapter 1 Purpose and Need to identify the potential location of the modifications/additions to the stormwater retention areas.</p>
1.16	We need to keep trees and parks.	<p>Comment noted. The Proposed Action would remove up to 480 acres of forested area on Airport property. However, the Proposed Action does not involve the taking of any park. In addition, at least 100 feet of vegetation and trees at the borrow sites would remain in place as a buffer and functional wildlife corridor. See Chapter 4 Section 4.3 Biological Resources for potential impacts to deforestation. No revisions to the Draft EA were necessary to respond to this comment.</p>
1.17	Every year the undeveloped areas get smaller. This places more burden on the undeveloped lands to house the animal habitat, serve as storm water collection, retention, and	<p>Comment noted. The potential impacts, and any relevant mitigation to reduce those impacts, to animal habitat, stormwater and water resources, and outdoor recreation areas are disclosed</p>

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	<p>discharge and, lastly, to serve the public's need for outdoor recreation and contact with natural areas.</p>	<p>in Chapter 4 Environmental Consequences and Mitigation Measures, see Chapter 4 Section 4.3 Biological Resources, Section 4.5, Section 4(f), Section 4.9 Land Use, Section 4.10, Noise and Noise-Compatible Land Use, and Section 4.13, Water Resources. The areas that are being impacted reside on airport property. This project does not reduce the opportunity for the public to recreate nor reduce the natural areas that the public can already access. The Airport Authority does not control land use development off-Airport property. No revisions to the Draft EA were necessary to respond to this comment.</p>
1.18	<p>Raleigh-Durham Airport Authority (RDUAA) of the past used their political positions, political connections, access to federal money, and connections to developers to take management control of land that has been on the Park acquisition list since the 1930's in order to block both the State's desire to expand the Park border to I-40 (parallel to the Airport) and Wake County's plans to create a permanent Park at Lake Crabtree (Site #23 in the publicly funded flood control program). One government official orchestrated the taking of land adjacent to Umstead and then went to work for the RDUAA to orchestrate the use of the land and keep it from being returned to the State and County. The past RDUAA "aggressively" went after land adjacent to the Park even though the Airport expanded on the total opposite side.</p>	<p>Comment noted. It is unclear how these comments are related to the Proposed Action which is the subject of this EA. No revisions to the Draft EA were necessary to respond to this comment.</p>
1.19	<p>The Airport is on environmentally sensitive land.</p>	<p>Comment noted. A description of the existing environmental conditions in and around the vicinity of Raleigh-Durham International Airport (RDU) is provided in Chapter 3, Affected Environment. For the purposes of this EA, two study areas have been defined to evaluate potential environmental impacts due to the Proposed Action, the General Study Area and the Detailed Study Area. The General Study Area is defined as the area where both direct and indirect impacts, such as noise, vibration, or visual impacts, may result from the development of the Proposed Action. The Direct Study Area is defined as the areas where there is the potential for ground disturbance. The existing environmental conditions are provided for the environmental</p>

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		resource categories as described in FAA Order 1050.1F. No revisions to the Draft EA were necessary to respond to this comment.
1.20	This Draft EA concludes that there are no substantial environmental concerns with constructing the new runway compared to the “No Action” alternative. A close look at the analysis indicates that is not likely the case. New analysis and text revisions are necessary.	The FAA considered the ability of each alternative to meet the purpose and need for the project and the potential environmental impacts. The FAA has described the special conditions that are required by the FAA to mitigate or minimize any potential impacts within the EA. See Chapter 4 Environmental Consequences and Mitigation Measures. With the implementation of the special conditions and mitigation measures, no environmental thresholds of significance were exceeded and additional analysis in an EIS is therefore not necessary. No additional analysis or revisions to the Draft EA were necessary to respond to this comment.
1.21	No additional runways, no gigantic parking lots. Instead improve transportation.	This project is replacing the existing runway in a new location. While there will be a new taxiway formed when the old runway is converted to a taxiway there would be no new runway or additional parking lot from this project. Any transportation changes off-airport are outside the scope of this project. Impacts from the additional impermeable surface will be addressed through the stormwater management practices as described in Chapter 4 Section 4.13 Water Resources.
1.22	Page 1-29 of the draft EA Section 1.7 (Requested Federal Actions) indicates that “... the Airport Authority requires the following approvals from the FAA and U.S. Army Corps of Engineers (USACE) before it can implement the Proposed Action.” One of the requirements listed is “Determination...that the selected alternative is reasonably consistent with existing plans of public agencies responsible for development in the area.” There are several existing plans of public agencies responsible for the development in the RDU area that are being ignored. These plans are older, but that does not decrease or eliminate their significance. They should not be swept under the rug. These plans include 1) the Crabtree Creek Watershed Project that started in the mid-1950’s, 2) Wake County’s parks and recreation plans associated with the Crabtree	<p>The FAA must make a determination under 49 U.S.C. 47106(a)(1) that the selected alternative is reasonably consistent with existing plans of public agencies responsible for development in the area before implementation of the Proposed Action.</p> <p>The Airport Authority is legislatively vested with the power and mandate to control, lease, maintain, improve, operate, and regulate RDU, with complete authority over the Airport.</p> <p>The EA does consider potential impacts to Section 4(f) resources including parks, and water resources including Brier Creek Reservoir, see Chapter 4 Section 4.5, Section 4(f), Section 4.6, Hazardous Materials, Solid Waste, and Pollution Prevention,</p>

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	<p>Creek Watershed Project, and 3) the NC State Park’s plans for protection of The William B. Umstead State Park. All of these plans pre-date not only this proposed runway expansion, but they pre-date many other RDUAA expansion plans. Historically, these plans have been ignored. They must be brought to light and past RDU actions that have harmed these plans should be rectified.</p>	<p>Section 4.10, Noise and Noise-Compatible Land Use, and Section 4.13, Water Resources.</p> <p>The EA also considers the Proposed Action’s consistency with local plans and policies. See Chapter 4 Section 4.8 Land Use. There is no taking of William B. Umstead State Park or any other park property related to the Proposed Action. In addition, the Proposed Action is consistent with local land use plans and policies.</p> <p>Coordination was conducted with NC State Parks during scoping and the comment period for the Draft EA. See Appendix A Agency and Public Involvement. In addition, coordination is ongoing with Wake County concerning the Crabtree Creek Watershed Policy and the potential mitigation for impacts to Brier Creek Reservoir.</p>
1.23	<p>Neither the new runway nor the PE3 expansion project are consistent with the existing plans of the federally, state, and locally funded Crabtree Creek Watershed Project that started in the mid-1950’s or for Wake County’s historical plans to use the Crabtree Creek Watershed Project sites as recreational areas.</p>	<p>As a requirement for development, the Airport Authority would comply with all applicable federal and state laws for the Proposed Action. See Chapter 4 Section 4.8 Land Use for a discussion of the Proposed Action’s consistency with surrounding land uses and zoning.</p> <p>The Proposed Action does include placing fill into the Brier Creek Reservoir to accommodate the relocated runway and approach lighting system. When Crabtree Creek Flood Control Structure 20 (i.e., Brier Creek Reservoir) was created, since the flood control structure was created mostly on Airport property, the Airport Authority retained the right to place fill in the flood control structure to accommodate future long-range development. Wake County is obligated to perform maintenance on the Brier Creek Reservoir, perform annual inspections, and prohibit the development, encroachment or installation of any improvements that interfere with their operation or modify their original design. With mitigation, the Proposed Action would be consistent with the Crabtree Creek Watershed Policy. See Chapter 4 Section 4.13</p>

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		Water Resources for a detailed discussion of the consistency with the Crabtree Creek Watershed Policy.
1.24	RDUAA wants to turn Wake County's most used Park, Lake Crabtree County Park, into an office park.	Lake Crabtree County Park is not part of this project nor is it impacted by this project, See Chapter 4, Section 4.5 Section 4(f). See Chapter 1 Purpose and Need for the elements of the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.
1.25	RDUAA claims that Wake County only pays a minimal amount each year to lease the land, but RDUAA fails to acknowledge that Wake County paid for a water line to the Airport area as part of the lease. In addition, RDUAA fails to acknowledge that Wake County also paid for sewer lines and the access road to the Lake Crabtree lands.	Comment noted. It is unclear how these comments are related to the Proposed Action which is the subject of this EA. Lake Crabtree County Park is not part of this project nor is it impacted by this project, See Chapter 4, Section 4.5 Section 4(f). No revisions to the Draft EA were necessary to respond to this comment.
1.26	All of the water from the proposed Park Economy 3 expansion drains into Haley's Branch Creek which is a documented part of Site #23 of the federally, state, and locally funded Crabtree Creek Watershed Project. Haley's Branch Creek runs directly into Lake Crabtree. So, Lake Crabtree, the lake created by federal, state, and local funds is affected by Airport projects from multiple directions. The cumulative effect must be accounted for in the EA! Thus, the PE3 expansion must be included in the EA.	The cumulative impacts of the Park Economy 3 Expansion Project was considered in Chapter 4, Section 4.14, Cumulative Impacts. The Park Economy 3 Expansion project is required or will require its own protective measures and permits to avoid and minimize impacts during implementation of the project. Both federal and non-federal projects would have to comply with local regulations regarding stormwater retention and treatment, obtain permits for grading and comply with water quality certification if required. No significant cumulative impacts to water resources would be expected. No revisions to the Draft EA were necessary to respond to this comment.
1.27	The PE3 expansion project is related to the new runway project and should not be segmented out of the new runway expansion project.	The Park Economy 3 Expansion Project is not an element of the Proposed Action being considered in the EA. On February 4, 2020, the FAA reviewed the Park Economy 3 expansion project and determined that under Section 163 of the FAA Reauthorization Act of 2018, it did not have regulatory authority over this project. Because the FAA does not have regulatory authority, the FAA does not have an action subject to NEPA. The Airport Authority must still comply with other environmental laws and regulations as applicable. The cumulative impacts of the Park Economy 3 Expansion Project was considered in Chapter 4,

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		Section 4.14, Cumulative Impacts. No revisions to the Draft EA were necessary to respond to this comment.
1.28	The PE3 expansion project and all parking projects along National Guard Drive must have a full environmental assessment not only because these projects are NOT reasonably consistent with existing plans of public agencies responsible for development of the Airport area, but because the Airport was able to take management control of these lands given their access to federal money.	The Park Economy 3 Expansion Project is not an element of the Proposed Action being considered in the EA. The FAA reviewed the Park Economy 3 expansion project and determined that, due to Section 163 of the FAA Reauthorization Act of 2018, it did not have regulatory authority over this project. Because the FAA does not have regulatory authority, the FAA does not have an action subject to the NEPA. The Airport Authority must still comply with other environmental laws and regulations as applicable. No revisions to the Draft EA were necessary to respond to this comment.
1.29	The public wants a great Airport, but not at the expense of the publicly funded Lake Crabtree County Park and Umstead State Park.	The Proposed Action does not include a constructive use or direct taking (physical use) of Lake Crabtree County Park or William B. Umstead State Park. See Chapter 4 Section 4.5 Section 4(f) and Section 4.7 Historical, Architectural, Archeological, and Cultural Resources. No revisions to the Draft EA were necessary to respond to this comment.
1.30	It's good that the new runway will be farther away from William B Umstead State Park	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.

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<b>2</b>	<b>PROPOSED ACTION</b>	
2.1	<p>In the spirit of compromising, I would suggest that nothing, and I mean nothing, be approved for RDU, until there is a willingness to approve increased public transportation, electric vehicle (EV) charging and other environmental stewardship elements in any plan moving forward. The willingness to sacrifice our natural environment and sacrifices to sustainable growth astounds me. Stop these expansion approvals until RDU shows a commitment to sustainable practices. If RDU wants to be world class, start acting like an airport authority with commitments for sustainability, as well as growth.</p>	<p>This project is not a capacity project but a safety project. The project by itself would replace a runway that is experiencing deterioration and structural failure due to alkali silica reactivity. Replacing the runway alone will not increase capacity. Furthermore, the Airport Authority cannot approve increased public transportation in the Research Triangle region. Neither the Airport Authority nor the FAA have the authority to require the public to use another form of transportation. In addition, while utilizing other transportation modes would mitigate demand for shorter range trips, they would not replace the capability and purpose of the primary runway at RDU. See Chapter 2 Alternatives for a discussion about other modes of transportation.</p> <p>While not a part of the Proposed Action, sustainable measures, including renewable energy sources, will be implemented by the Airport Authority in the future. The Airport Authority currently conducts various initiatives that conserve natural resources, reduces solid waste through recycling efforts, and conserves energy with light-emitting diode (LED) lighting and fritted glass to reduce cooling needs. In addition, the Airport Authority has adopted and is implementing a Sustainability Management Plan (SMP) to improve the tracking and communication of the airport's sustainability initiatives, increase efficiency, and better incorporate economic savings and environmental stewardship into project planning. The SMP provides a road map for the integration of environmental sustainability into its planning, design, construction, maintenance, and operations. RDU has developed sustainability goals that includes but is not limited to energy usage, waste management and recycling, emissions, and water consumption. No revisions to the Draft EA were necessary to respond to this comment.</p>
2.2	<p>The Airport must not negatively affect or take away access to publicly funded and valued recreation areas.</p>	<p>The Proposed Action does not include a constructive use or direct taking (physical use) of publicly funded recreation areas. See Chapter 4 Section 4.5 Section 4(f) and 4.7 Historical, Architectural, Archeological, and Cultural Resources. There is no</p>

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		<p>taking away of access to publicly funded and valued recreation areas with the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>
2.3	<p>The Proposed Alternative should be modified to substantially reduce deforestation and wetland/surface water impacts and acknowledge noise impacts to William B Umstead State Park.</p>	<p>The Airport Authority, the FAA, and the USACE reviewed various alternatives and went through a deliberative process to identify the Proposed Action so that the project would be designed/ built/ and operated in a responsible manner.</p> <p>The Proposed Action would increase deforestation by cutting down approximately 480 acres of contiguous forest at the borrow site and adjacent to the proposed replacement runway on Airport property. The total 480 acres of forested areas that would be removed are comprised of three primary forest types: mixed/pine hardwood forest, pine-dominant forest, and hardwood forest (altered). However, the Airport Authority would leave 100 feet of the existing trees and vegetation in place around the perimeter of the borrow sites as a buffer area and to provide a functional wildlife corridor. After vegetation and trees are removed and the fill material is excavated for the Proposed Action, the area would be graded and planted with appropriate native ground cover vegetation approved by the NCDEQ to prevent erosion.</p> <p>As disclosed in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use and Appendix F Noise, with the implementation of the Proposed Action at RDU the noise contours are moved farther away from William B. Umstead State Park. Therefore, the William B. Umstead State Park would experience a net reduction in noise exposure due to the Proposed Action as compared to the future No Action Alternative.</p> <p>In addition, any potential water impacts would be addressed by mitigating for the loss of jurisdictional and non-jurisdictional wetlands and open surface waters including streams and obtaining all required permits and approvals needed for construction. See Chapter 4 Section 4.13.4 Water Resources, Mitigation, Avoidance, and Minimization Measures for additional</p>



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		<p>information on water resource mitigation, avoidance, and minimization measures.</p> <p>The Airport Authority would comply with all applicable federal and state laws concerning erosion control. An Erosion and Sedimentation Control (ESC) Plan would be developed and approved by the NCDEQ prior to construction. Best management practices and erosion control measures will be identified to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact. The Airport Authority would obtain approval of the ESC Plan from the NCDEQ. Based on these findings William B. Umstead State Park would not be considered impacted by the Proposed Action and would not require special consideration.</p>
2.4	<p>North Carolina Department of Environmental Quality (NCDEQ) states that permit(s) and/or approvals may need to be obtained for this project to comply with North Carolina Law including open burning permit, demolition of buildings containing asbestos, approval of erosion and sediment control plan, compliance with National Pollutant Discharge Elimination System (NPDES) program, notification of orphan underground storage tanks if discovered, coordination and approval from Town of Cary on any water system use.</p>	<p>Comment noted. The Airport Authority is in communication with NCDEQ for their requirements for the Proposed Action. The Airport Authority will be responsible for obtaining any required permits from NCDEQ for construction of the Proposed Action.</p> <p>If conditions occur during construction activities, and water from Brier Creek Reservoir is not sufficiently available, it is anticipated that water would come from local municipal sources such as the Town of Cary. The Airport Authority would coordinate with the Town of Cary to determine how much water would be needed at that time and to ensure that potential water supplies for the town are not interrupted. The Town of Cary has already indicated they have water capacity to support the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>
2.5	<p>There's no reason to cut down more trees and create more impervious surface area.</p>	<p>As discussed in Chapter 1 Purpose and Need, there is a demonstrated need to reconstruct Runway 5L/23R and to maintain RDU's existing infrastructure and operational capabilities. The Airport Authority and the FAA have shown in their alternatives analysis that there were no practicable alternatives that would meet the purpose and need and avoid all potential environmental impacts. See Chapter 2 Alternatives. No revisions to the Draft EA were necessary to respond to this comment.</p>

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2.6	<p>RDUAA constantly complains about the cost of the expansion. There is a very easy way to offset that cost – management control of the land is way, way, way remote to the Airport but an intimate part of a highly used recreation corridor to Wake County (i.e., Lake Crabtree County Park) and the State (i.e., Odd Fellows, 286 East, and the buffer for Haley’s Branch Creek consisting of part of 286 West and 286 North). The Airport will not in any way be harmed, financially or physically, by returning land that encroaches into the Park to the control of the State.</p>	<p>Comment noted. No revisions to the Draft EA were necessary to respond to this comment.</p>
2.7	<p>I and everyone I know want a good airport, but, we do not want this at the expense of the recreation corridor that runs parallel to the Airport and is formed by Umstead State Park, Lake Crabtree County Park, the lands in between these areas and the artery greenways that pass through this area.</p>	<p>The Proposed Action does not include a constructive use or direct taking (physical use) of publicly funded recreation areas. See Chapter 4 Section 4.5, Section 4(f) and Section 4.7 Historical, Architectural, Archeological, and Cultural Resources. The Proposed Action does not impact the East Coast Greenway, Umstead Park, or Lake Crabtree County Park (which is Airport Authority property leased to Wake County). No revisions to the Draft EA were necessary to respond to this comment.</p>
2.8	<p>The proposed replacement runway is west of, and will be longer than, the current long runway and results in a significant rerouting of Lumley Drive.</p>	<p>Comment noted. As described in Chapter 1 Purpose and Need, the Proposed Action does include relocating the existing Runway 5L/23R approximately 537 feet to the northwest of the existing Runway 5L/23R with a 10,639-foot-long physical runway pavement. In addition, a portion of Lumley Road and the Lumley-Commerce intersection must be removed from the Runway 23R approach Runway Protection Zone. While Lumley Drive is relocated the road will still service all locations previously serviced to the extent possible. No revisions to the Draft EA were necessary to respond to this comment.</p>
2.9	<p>Unnecessary deforestation is a significance threshold and it is inconsistent the RDU Sustainability Policy (2023). It is not insubstantial to deforest 200 plus acres of forested public land to provide fill for the runway construction.</p>	<p>According to the RDU Sustainability Management Plan, environmental stewardship and the conservation of natural resources such as trees and vegetation, wildlife, surface water, and wetlands is important to the Airport Authority’s efforts to protect water quality, preserve biological diversity and protect wildlife habitat. The management of land use and natural resources is balanced with RDU’s business and operational</p>

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		<p>needs to ensure long-term economic, social and ecological function.</p> <p>The Airport Authority and the FAA have shown in their alternatives analysis that there were no practicable alternatives that would meet the purpose and need which would avoid all adverse impacts and avoid the removal of approximately 480 acres of forested area on Airport property. See Chapter 2 Alternatives for the discussion of alternatives.</p> <p>As part of the Proposed Action at least 100 feet of vegetation and trees at the borrow sites would remain in place as a buffer and a functional wildlife corridor. The Airport Authority has not determined any long-term use for the borrow site areas. Permanently disturbed areas will be seeded or mulched to stabilize the soil and appropriate native species ground cover approved by NCDEQ will be planted. No revisions to the Draft EA were necessary to respond to this comment.</p>
2.10	<p>The City of Cary's offer to supply water for hydro-compaction of fill is a better alternative in terms of risks and community relations.</p>	<p>The Airport Authority plans to use water from Brier Creek Reservoir due to its proximity to the construction site. The water would be removed from Brier Creek Reservoir and applied to the fill material over a period of approximately two years to compact the soil. This process would also allow for Brier Creek Reservoir to be naturally recharged with this same water as it returns to the water table. Water would be collected near the surface of the water column in Brier Creek Reservoir to avoid disturbing contaminated sediment of the reservoir. Use of this water is more environmentally responsible because it avoids the costs, chemicals and energy required to create potable drinking water for a use that does not require treated water. If, however, conditions occur during construction activities, and water from Brier Creek Reservoir is not sufficiently available, it is anticipated that water would come from local municipal sources such as the Town of Cary. The Airport Authority would coordinate with the Town of Cary to determine how much water would be needed at that time and to ensure that potential water supplies for the town</p>

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		are not interrupted. The Town of Cary have already indicated they have water capacity to support the RDU Airport. No revisions to the Draft EA were necessary to respond to this comment.
2.11	More buses & that commuter rail YOU should all be pushing for and fast.	The Airport Authority and the FAA cannot approve increased public transportation such as busing and or commuter rail in the Research Triangle region. Neither the Airport Authority nor the FAA have the authority to require the public to use another form of transportation. In addition, while utilizing other transportation modes would mitigate demand for shorter range trips, they would not replace the capability and purpose of the primary runway at RDU. No revisions to the Draft EA were necessary to respond to this comment.
2.12	RDU has a rule for expansion, so that should be rescinded!	Comment noted. This project is not an expansion project but a safety project. No revisions to the Draft EA were necessary to respond to this comment.
2.13	Per statements made at the RDUA meeting on 16/Mar/2023, the new runway is tied to the Terminal 2 Landside Expansion Program and the Terminal 2 Landside Expansion Program “cannot begin until the first phase of the Park Economy 3 (PE3) Expansion project is completed.” Thus, these projects are all tied together! Given that the PE3 project area is partially included in the General Study Area for the new runway and how intimately the PE3 expansion is tied to the actual implementation of the runway project, the PE3 expansion should be included in the new runway EA. To not do so is project segmentation.	The Airport Authority identified a long-term plan as part of the Master Plan Vision 2040 to understand conceptually how the Airport may develop into the future. Not all of the elements shown in the Master Plan Vision 2040 and on the FAA conditionally approved ALP are ready to be implemented, including the potential Terminal 2 Expansion. The potential Terminal 2 Expansion requires additional planning by the Airport Authority and review by FAA before it is considered reasonably foreseeable. The Park Economy 3 Expansion Project is not an element of the Proposed Action being considered in the EA. The FAA reviewed the Park Economy 3 expansion project and determined that, due to Section 163 of the FAA Reauthorization Act of 2018, it did not have regulatory authority over this project. See Chapter 1, Section 1.2 Background Information for information on Section 163. Because the FAA does not have regulatory authority, the FAA does not have an action subject to the NEPA. The Airport Authority must still comply with other environmental laws and regulations as applicable. The cumulative impacts of the Park Economy 3 Expansion Project was considered in Chapter 4 Section 4.14 Cumulative Impacts.

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		No revisions to the Draft EA were necessary to respond to this comment.
2.14	In addition to the PE3 expansion area being partially included in the General Study Area for the new runway project, the other parking lots off of National Guard Drive are included in the General Study Area for the new runway project. Basically, RDUAA plans to deforest all land between National Guard Drive and Umstead State Park. The deforestation for these surface parking lots affects Haley's Branch Creek which drains into The William B. Umstead State Park via Lake Crabtree. These parking lot projects are related to the new runway project as they are related to the main parking garage, new rental car facility, and PE3 expansion. These projects need to be included into this EA. To not include these projects is project segmentation.	The Park Economy 3 Expansion Project is not an element of the Proposed Action being considered in the EA. The Proposed Action does not include any parking lots off National Guard Drive. Not all of the elements shown in the Master Plan Vision 2040 and on the FAA conditionally approved ALP are ready to be implemented. No additional parking lots are required to implement the Proposed Action. Any planned parking lot changes that are being altered now or in the near future and any recent parking lot changes are included in the cumulative affects analysis. See Chapter 4, Section 4.14 Cumulative Impacts for cumulative analysis, specifically Table 4-26 for a list of projects included in the cumulative impacts analysis. No revisions to the Draft EA were necessary to respond to this comment.
2.15	Neither the new runway nor the PE3 expansion project are consistent with the existing State plans for the protection of The William B. Umstead State Park. Both negatively affect the Park in several ways. The water from Lake Crabtree contains Airport runoff from at least two directions: Brier Creek (from the new runway) and Haley's Branch Creek (from the PE3 expansion).	The Park Economy 3 Expansion Project is not an element of the Proposed Action being considered in the EA. As a requirement for development, the Airport Authority would comply with all applicable federal and state laws for the Proposed Action. See Chapter 4 Section 4.8 Land Use for a discussion of the Proposed Action's consistency with surrounding land uses and zoning. See Chapter 4, Section 4.13 Water Resources for a discussion of the Proposed Action's potential water resource impacts. No revisions to the Draft EA were necessary to respond to this comment.
2.16	RDUAA would like to segment the PE3 project away from the runway expansion to avoid Section 4(f) and Section 6(f) issues (both of which are applicable to Umstead State Park). These projects are related and should be assessed as one.	The Park Economy 3 Expansion Project is not an element of the Proposed Action being considered in the EA. The FAA reviewed the Park Economy 3 expansion project and determined that, due to Section 163 of the FAA Reauthorization Act of 2018, it did not have regulatory authority over this project. The Proposed Action is independent from the PE3 Expansion Project. Furthermore, any expansion of PE3 will adhere to the applicable requirements of state and federal law. No revisions to the Draft EA were necessary to respond to this comment.

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<b>3</b>	<b>PURPOSE AND NEED</b>	
3.1	I think the Proposed Action is a waste of taxpayers' money. I do think that the expense of billions of dollars is something that is not necessary for our federal government to continue giving grants to the airport.	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.
3.2	The Airport could just replace the concrete slabs rather than replace the whole runway.	The airport has been replacing slabs continuously since 2009. However, current prediction is that the primary runway would continue to experience cracks which would only increase in time and would require more costly repairs and runway closures. Eventually, the runway would no longer be able to maintain its current capability and will require a full reconstruction, causing a significant loss of air service. No revisions to the Draft EA were necessary to respond to this comment.
3.3	RDU's master plan calls for a purposeful development of the airport campus, including the relocation of the primary runway to the west, which will enable capacity expansion of Terminal 2.	The Airport Authority identified a long-term plan as part of the Master Plan Vision 2040 to understand conceptually how the Airport may develop into the future. Not all of the elements shown in the Master Plan Vision 2040 and on the FAA conditionally approved ALP are ready to be implemented. While the location of the future runway would allow planned development of the Terminal 2 expansion, the purpose of the Proposed Action is to provide a structurally sound primary runway at RDU that maintains its current runway capabilities not to enable capacity expansion of Terminal 2. If and when the Airport Authority decides to move forward with any of these future development projects, including expansion of Terminal 2, additional coordination with FAA and potential NEPA documentation would be required. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
3.4	<p>The economic footprint of the North Carolina’s Research Triangle region continues to grow, and it is dependent on a successful runway, and we need the runway to be expanded and ready for the future of this market. Expansion is vital to our community.</p>	<p>Comment noted. The Proposed Action is not to increase the capacity of the Airport but to maintain the current capability of the Airport. In order to provide landing distance closest to the 10,000 feet in length of the existing runway and meet FAA safety area standards, the replacement runway would require a 10,639-foot-long physical runway pavement. See Chapter 1 Purpose and Need. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
3.5	They say they needed to move it over 537 feet so that big 787's can come in. We don't have very many of those. So, I think it is unnecessary for this alternative.	<p>The Proposed Action is not to accommodate any new types of aircraft. The purpose of the Proposed Action is to provide a structurally sound primary runway at RDU that maintains its current runway capabilities as discussed in Chapter 1 Purpose and Need. There would be no change to the number of aircraft operations or fleet mix as a result of the Proposed Action.</p> <p>During the Master Planning process, the proposed location of the relocated Runway 5L/23R, 537 feet from the current runway, was identified. This distance was selected to facilitate compliance with FAA design standards, allow unrestricted taxi movements and construction activities of the relocated runway while still operating the existing Runway 5L/23R. While the location of the future runway would allow planned development of the Terminal 2 expansion, the purpose of the Proposed Action is to provide a structurally sound primary runway at RDU that maintains its current runway capabilities not to enable capacity expansion of Terminal 2.</p> <p>Alternatives closer than 537 feet to the existing runway were not considered practicable or feasible because they would not accommodate unrestricted aircraft movements and FAA separations requirements. Alternatives further to the northwest beyond 537 feet were not considered practicable or feasible because they would increase environmental impacts. Any runway alternative to the northwest beyond 537 feet would include fill between the existing runway and any future runway, thereby increasing the footprint of the impact. Furthermore, changes in elevation would require additional fill material that would impact Waters of the U.S. No revisions to the Draft EA were necessary to respond to this comment.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
3.6	We don't need this project since we already have a functioning runway.	It is anticipated the primary runway would continue to experience cracks which would only increase in time and would require more costly repairs and runway closures. Eventually, the runway would require a full reconstruction and would no longer be able to maintain its current capability. Therefore, to do nothing in the future, or what is referred to as the No Action Alternative, is not practical or economically feasible because it would require continuing costly repairs as the runway deteriorates more and more into the future. At some point, total reconstruction would be needed, and the runway would need to be closed for an extended period of time with a resultant loss in air service to the community. See Chapter 1 Purpose and Need. No revisions to the Draft EA were necessary to respond to this comment.
3.7	Most people will fly to Charlotte or Atlanta or New York or Dulles to fly internationally. I don't see that we need any international flights.	Comment noted. The purpose of the project is safety not capacity (international or domestic). No revisions to the Draft EA were necessary to respond to this comment.
3.8	The impact on the environment in which I live is much more valuable than the need to fly directly to foreign destinations. If I had interest in compromising my quality of life for easier travel, I would move to the cities where this is possible. This request is rooted in greed, not because the traveling community needs it.	Comment noted. The purpose of the project is safety not capacity (international or domestic). No revisions to the Draft EA were necessary to respond to this comment.
<b>4</b>	<b>ALTERNATIVES</b>	
4.1	I am hopeful that the soil that will be used in constructing the runway could come not from the borrow sites on airport but from the Martin Marietta quarry on Westgate Road.	The use of only the Martin Marietta Quarry for the fill dirt needed for the Proposed Action would not be practical or feasible from a technical and economic standpoint. An alternatives analysis was conducted and is provided in Chapter 2 Alternatives. The use of only off Airport borrow sites would result in unnecessary costs, traffic disruptions, vehicle emissions, use of fuel, and extensive delays to the construction schedule as compared to the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
4.2	Off-site sources of construction fill are readily available from rock quarries. Why clear-cut forested public land for fill when offsite fill is readily available and likely free?	While off site sources of construction fill may be available, the use of off Airport borrow sites would result in extensive delays to the construction schedule, unnecessary costs, traffic disruptions, vehicle emissions, and additional use of fuel as compared to the Proposed Action. See Chapter 2 Alternatives. The Airport is not aware of any free fill material in the amount that is needed for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.
4.3	Please consider other areas with less environmental impact.	The Airport Authority and the FAA reviewed various alternatives and went through a deliberative process to identify the Proposed Action and reduce potential environmental impacts. Total avoidance of potential environmental impacts is not practicable due to the amount of fill needed for the project. With the implementation of the special conditions and mitigation measures, no environmental thresholds of significance are expected to be exceeded. No revisions to the Draft EA were necessary to respond to this comment.
4.4	The EA employs a rather preposterous analysis (Appendix B) to reject off-site fill sources as too expensive and environmentally unsafe compared to a conveyor belt system that also uses the same truck and stockpile methods for placing fill.	Comment noted. Appendix B Purpose and Need and Alternatives considered the use of off-site locations for fill materials but determined these sources would result in unnecessary costs, traffic disruptions, vehicle emissions, use of fuel, and extensive delays to the construction schedule as compared to the Proposed Action. Off-site locations for fill materials are located farther away from the construction site as compared to the proposed borrow areas. As described in Chapter 1 Purpose and Need, there are two ways that may be used to transport the fill to the site of the relocated runway 1) traditional trucking or 2) use of a conveyor system from the proposed Airport property borrow sites. The use of a conveyor system is not being considered for off-Airport sites. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
4.5	<p>The only difference in impacts (from using offsite sources of fill to onsite fill) will be the need for more extensive track-out stations and there will be truck traffic on local roads leading from the quarry. Did the EA contractor perform a traffic analysis study for construction impacts?</p>	<p>As described in Chapter 2 Alternatives and in Appendix B Purpose and Need and Alternatives, there are differences between the use of off-site locations and on-site at the proposed borrow site. The use of off-site locations for fill materials would result in unnecessary costs, traffic disruptions, vehicle emissions, use of fuel, and extensive delays to the construction schedule as compared to the Proposed Action. A specific traffic analysis study for construction impacts was not conducted as part of the EA. However, if trucking is used to transport fill material from the proposed borrow sites as part of the Proposed Action, a temporary increase in surface traffic is anticipated during construction but would be limited to a portion of Pleasant Grove Church Road and Nelson Road. The use of off-site locations would require a more extensive use of truck trips on local roadways traveling a greater distance. No revisions to the Draft EA were necessary to respond to this comment.</p>
4.6	<p>The EA also implies that trucks leaving the construction zone will have extensive cleaning. Other than gravel entrance best management practices (BMP) what is the basis for truck cleaning after dumping?</p>	<p>The Airport Authority will have an Erosion and Sediment Control (ESC) Plan, approved by the NCDEQ, prior to commencing construction. Specific measures of the plan are not included in the EA but will be coordinated with the state. It is anticipated the ESC Plan would include BMPs to prevent dirt and gravel from leaving the construction site and being deposited on public roadways such as Pleasant Grove Church Road. The BMPs are anticipated to include providing a temporary gravel construction entrance and exit. Driving over the gravel removes dirt and sediment from truck wheels. It is possible that the use of gravel alone would not sufficiently contain mud and sediment from vehicles and additional BMPs would be utilized to the extent necessary to wash off dirt covered trucks before exiting the construction site. It is anticipated that a wheel wash system will be utilized. This would wash mud and sediment from the vehicles before they leave the construction site. There would be no other basis for truck cleaning after dumping. Other potential BMPs may be identified in the ESC Plan approved by the NCDEQ.</p>

<p>4.7</p>	<p>The EA technical Memo supporting the decision not to use off-site fill sources fails to disclose basic assumptions and logic to support the analysis as presented. For example, an assumption gleaned from Table 1 is that Martin Marietta can handle no more than 150 trips per day (15 yds/truck) with 30 trucks. That comes to 5 round daily trips per truck! Not believable. I suggest the total duration in days to supply 1,750,00 yards from Martin Marietta Raleigh is no different from the on-site fill sources. An independent thorough analysis is needed to check these back of the envelope estimates if RDU wants to insist on fill from on-site sources.</p>	<p>Assumptions for the Off-Site Borrow analysis are provided in Section C.1 and Attachment 1 of the Technical Memo in Appendix B Purpose and Need and Alternatives. The use of trucks in the technical memo in Appendix B Purpose and Need and Alternatives is based upon the most current information. The analysis considered the following:</p> <ul style="list-style-type: none"> <li>• Time needed to excavate and fill a truck (load time) (1.6 minutes)</li> <li>• Time needed to drive from the borrow site to the construction site and back (cycle time) (varies per site)</li> <li>• Type of trucks used (quad dump truck)</li> <li>• Volume of fill a truck can accommodate (12 cubic yards)</li> <li>• Regulatory limitations in the maximum duration a driver can operate a truck in a week (60 hours / week)</li> <li>• Current labor and equipment shortages</li> <li>• Hours in a day and days in a week of work (5, 12-hr days, or 6, 10-hr days)</li> <li>• Construction costs per cubic yard (varies per site)</li> <li>• Delays in construction based on weather (0.64 efficiency factor)</li> </ul> <p>For each of the off-site haul operations, the Airport Authority estimated the number of trucks and time needed to complete the Proposed Action. The differences in sites analyzed include the distance and hence time required to drive a truck to and from the borrow and construction sites, and construction cost per cubic yard of fill transported.</p> <p>For the Martin Marietta location, which is the focus of the comment, it was estimated that each truck generally makes 12 to 15 trips per day. Based on the cycle time and load time, the total number of trucks that can operate in a day is 27 trucks. 27 trucks is the number of trucks that keeps an excavator running at max efficiency based on the load rate of the excavator and the cycle time of the trucks. (The number of trucks equals cycle time divided by load time. The cycle time from Martin Marietta to dump</p>
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COMMENT #	SUMMARY OF COMMENT	RESPONSE
		<p>site and back is 43 minutes / time to load a dump truck using an excavator is 1.6 minutes which equals 27 trucks.) With the 27 trucks operating the production rate is 405 trips made in a day, which is much higher than the 150 trips from the comment.</p> <p>However, the total duration in days to supply approximately 1,750,000 cubic yards of fill material from Martin Mariette is different from using the on-site fill sources. The potential for improved production rates is what makes the on-site borrow sites preferable to use as a fill source compared to off-site borrow areas from a time savings perspective. This is mirrored also by the total cost savings, which are also less from taking fill from on-site borrow sites.</p> <p>None of the off-site borrow sites has the fill material available to supply the entire 5 million cubic yards of fill that may be needed for the project. Therefore, if off-site sources are used, multiple sites would need to be used to complete the project. The use of the Martin Marietta site results in a much longer duration to complete the project as well as increased cost as compared to using the on-site borrow location. Considering the current trucking market and lack of available borrow material near the Airport, obtaining the off-site material will adversely impact the Proposed Action as compared to the use of the proposed borrow sites. No revisions to the Draft EA were necessary to respond to the comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
4.8	The EA analysis also speculated with no real foundation that there might not be sufficient trucks to transport off-site fill to the runway as reason to reject the off-site fill alternative.	The use of trucks in the technical memo in Appendix B Purpose and Need and Alternatives is based upon the most current information. The Airport Authority checked with several local site work contractors as well as trucking providers. The general consensus was that it is very difficult to get more than 30 trucks a day committed to a single operation. Due to the volumes involved and the ability to provide committed work for an extended period for the Proposed Action, the Airport Authority concluded it's possible to run that size operation at two different sources. Only the Martin Marietta location due to it's closer proximity requires less than 30 trucks for full efficiency. The other potential borrow sources would require 60-105 trucks for maximum production, which the Airport Authority does not feel is realistic. Trucks would have to be operated for a longer duration to move the fill material for off-airport sites as compared to the proposed borrow sites due to the greater distance travelled.
4.9	The better choice for a source of fill is off-site both economically and environmentally. RDU should not destroy public water resources, wetland, or stream buffers to supply fill for the runway.	Comment noted. The FAA considered off-airport borrow sites. These sites would result in unnecessary costs, traffic disruptions, vehicle emissions, use of fuel, and extensive delays to the construction schedule. Unavoidable impacts would be mitigated for as discussed on the sections for the respective resources in Chapter 4 Environmental Consequences and Mitigation Measures. See Chapter 2 Alternatives for a discussion on alternative borrow sites. No revisions to the Draft EA were necessary to respond to this comment.
<b>5</b>	<b>WILLIAM B. UMSTEAD STATE PARK</b>	
5.1	We made a formal statement, a very specific statement, that fill... for the new runway will (not) come from any land between National Guard Drive and Umstead State Park. Those tracks are known locally as Odd Fellows, 286 West, 286 North, 286 East. And, again, it just needs to be a specific statement so that the airport doesn't take that land down the road, again those lands are on the critical acquisition list for Umstead State Park. So, they are important.	The EA provides a description and exhibit of the Proposed Action including the location of the proposed borrow areas for fill material. See Chapter 1 Purpose and Need of the EA. The borrow sites are not between National Guard Drive and William B. Umstead State Park. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.2	<p>I am requesting that you uphold and recognize that William B. Umstead State Park has protected status:</p> <ul style="list-style-type: none"> <li>-Protected by its Reverter Clause in the 1943 Deed transfer from the National Park Service to the State of North Carolina</li> <li>-Listing in the National Register of Historic Places, protecting its forested landscape and an historic property where the quiet, forested setting is recognized to be a key purpose and attribute</li> <li>-Protected under U.S. DOT Section 4(f) as a publicly owned part with State and National Significance</li> <li>-Protected by the Federally funded Land and Water Conservation (LWCF) funds, administered by the National Park Service.</li> </ul>	<p>The EA evaluates potential environmental impacts to resources in the General Study Area, including public lands such as William B. Umstead State Park.</p> <p>The Reverter Clause does not apply because as described in the EA, the Proposed Action does not include any land transfer or change of use of the property that makes up William B. Umstead State Park.</p> <p>As stated in Chapter 3, Section 3.5 Section 4(f) the Crabtree Creek Recreational Demonstration Area, now named the William B. Umstead State Park, is listed on the National Register of Historic Places (NRHP) and was identified as having a portion of William B. Umstead State Park within the GSA. William B. Umstead State Park is a 4(f) resource because it is a recreational park of significance to the area, and it is also a 4(f) resource because it is listed on the NRHP.</p> <p>A review of the LWCF grants awarded in North Carolina was conducted in the Draft EA to identify any recreational facilities funded under the LWCF within the GSA. According to the North Carolina Division of Parks &amp; Recreation, LWCF Grants Awarded located by the following <a href="https://www.ncparks.gov/about-us/grants/land-and-water-conservation-fund-grants/lwcf-grants-awarded">https://www.ncparks.gov/about-us/grants/land-and-water-conservation-fund-grants/lwcf-grants-awarded</a>, the William B. Umstead State Park did not receive LWCF grants. Based on the information received from the commenter, a further review was conducted. According to information from the Land and Water Conservation Fund, <a href="https://lwcf.tplgis.org/mappast/">https://lwcf.tplgis.org/mappast/</a>, it was confirmed that LWCF funding was used for William B. Umstead State Park. Additional text was added to Chapter 3 Section 3.5 Section 4(f) and Chapter 4 Section 4.5 Section 4(f) to reflect this information. However, these areas will not be impacted by the Proposed Action. The Proposed Action does not include any conversion of LWCF-assisted land within William B. Umstead State Park.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.3	General comment to protect William B Umstead State Park.	Comment noted. The EA evaluates potential environmental impacts to resources in the General Study Area, including public lands such as William B. Umstead State Park, see Chapter 4, Section 4.5, Section 4(f). No revisions to the Draft EA were necessary to respond to this comment.
5.4	There is a need for wide buffers along Umstead State Park & East Coast Greenway.	Comment noted. Neither the Airport Authority nor the FAA have the authority to add buffers to William B. Umstead State Park and East Coast Greenway. The Proposed Action does not include any changes to William B. Umstead State Park and East Coast Greenway. The East Coast Greenway is not within the limits of disturbance for the Proposed Action. The Proposed Action does not impact the East Coast Greenway. The Proposed Action actually moves the primary runway at RDU farther away from William B. Umstead State Park as compared to the existing runway. No revisions to the Draft EA were necessary to respond to this comment.



COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.5	The EA treats the protective status of Umstead Park similar to that given to a soccer / athletic field.	<p>The William B. Umstead State Park is subject to land use compatibility guidelines within 14 CFR part 150, Appendix A, Table 1. This table states that parks, including state parks and Section 4(f) properties are compatible with noise levels below 65 DNL. As stated in Chapter 3, Section 3.5 Section 4(f) the Crabtree Creek Recreational Demonstration Area, now named the William B. Umstead State Park, is listed on the National Register of Historic Places (NRHP) and was identified as having a portion of William B. Umstead State Park within the GSA. William B. Umstead State Park is a 4(f) resource because it is a recreational park of significance to the area, and it is also a 4(f) resource because it is listed on the NRHP.</p> <p>Based on the information received from the commenter, a further review was conducted. According to information from the Land and Water Conservation Fund, <a href="https://lwcf.tplgis.org/mappast/">https://lwcf.tplgis.org/mappast/</a>, it was confirmed that LWCF funding was used for William B. Umstead State Park, meaning the land is protected under LWCF Section 6(f). However, these areas will not be impacted by the Proposed Action. The Proposed Action does not include any conversion of LWCF-assisted land within William B. Umstead State Park to uses other than public outdoor recreation. Additional text was added to Chapter 3 Section 3.5 Section 4(f) and Chapter 4 Section 4.5 Section 4(f) to reflect this information.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.6	<p>The EA fails to recognize Umstead State Park's status on the National Register of Historic Places, its protection under Department of Transportation (DOT) Section 4(f), the Reverter Clause and its LWCF funding. To treat it as this plan has is a disgrace to this region.</p>	<p>As stated in Chapter 3, Section 3.5 Section 4(f) the Crabtree Creek Recreational Demonstration Area, now named the William B. Umstead State Park, is listed on the National Register of Historic Places (NRHP) and was identified as having a portion of William B. Umstead State Park within the GSA. This state park is a 4(f) resource because it is a recreational park of significance to the area, and it is also a 4(f) resource because it is listed on the NRHP.</p> <p>Based on the information received from the commenter, a further review of LWCF grants awarded in North Carolina was conducted. According to information from the Land and Water Conservation Fund, <a href="https://lwcf.tplgis.org/mappast/">https://lwcf.tplgis.org/mappast/</a>, it was confirmed that LWCF funding was used for William B. Umstead State Park. However, these areas are not within the GSA and will not be impacted by the Proposed Action. The Proposed Action does not include any conversion of LWCF-assisted land within William B. Umstead State Park to uses other than public outdoor recreation. Additional text was added to Chapter 3 Section 3.5 Section 4(f) and Chapter 4 Section 4.5 Section 4(f) to reflect this information. The Reverter Clause does not apply because as described in the EA, the Proposed Action does not include any land transfer or change of use of the property that makes up William B. Umstead State Park.</p>
5.7	<p>I'm devastated by your plans for development near this fragile ecosystem (Umstead State Park).</p>	<p>Comment noted. The Proposed Action does not include a constructive use or direct taking (physical use) of William B. Umstead State Park. The FAA has described the special conditions that are required by the FAA to mitigate or minimize any potential impacts within the EA. See Chapter 4 Environmental Consequences and Mitigation Measures. With the implementation of the special conditions and mitigation measures, no environmental thresholds of significance were exceeded. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.8	<p>As you know, the protection of Umstead has received considerable public support related to the Wake Stone proposed quarry site and I would ask that the same consideration be given to protecting this resource as it pertains to mitigating impacts from the RDU airport.</p>	<p>Comment noted. The Proposed Action does not include a constructive use or direct taking (physical use) of William B. Umstead State Park. The FAA has described the special conditions that are required by the FAA to mitigate or minimize any potential impacts within the EA. See Chapter 4 Environmental Consequences and Mitigation Measures. With the implementation of the special conditions and mitigation measures, no environmental thresholds of significance were exceeded. No revisions to the Draft EA were necessary to respond to this comment.</p>
5.9	<p>The park needs to be listed in the national register of historic places and protected as a publicly owned park per its deed transfer in 1943 to the state of NC so it can be preserved for future generations.</p>	<p>Comment noted. As stated in Chapter 3, Section 3.5 section 4(f) the Crabtree Creek Recreational Demonstration Area, now named the William B. Umstead State Park, is listed on the National Register of Historic Places (NRHP) and was identified as having a portion of William B Umstead State Park within the GSA. This state park is a 4(f) resource because it is a recreational park of significance to the area, and it is also a 4(f) resource because it is listed on the NRHP. The Proposed Action does not include a constructive use or direct taking (physical use) of publicly funded recreation areas. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.10	<p>I am very concerned about staff understanding of the uniqueness of this situation (that being the Airport neighboring a huge public recreation corridor) and staff knowledge of the local area and the important history. Staff, whether contracted or direct hire, needs to know the local area and the important history. Staff cannot make good decisions if they are not familiar with the area or the history, especially land management control.</p>	<p>Comment noted. Airport staff and the consultants participating on this EA have relevant firsthand knowledge of the local area and the environmental issues addressed in the EA. The list of preparers of the EA is provided in Chapter 6 List of Preparers and is composed of environmental experts in their fields. This Environmental Assessment (EA) analyzes the potential environmental effects of the Proposed Runway 5L/23R Replacement Project (Proposed Action) at the Airport. The FAA is the lead federal agency ensuring compliance with NEPA for this Proposed Action; therefore, this EA is consistent with FAA Order 1050.1F, <i>Environmental Impacts: Policies and Procedures</i> (including the 1050.1F Desk Reference), and FAA Order 5050.4B, <i>NEPA Implementing Instructions for Airport Actions</i>. This EA identified and assessed the potential environmental impacts of the Proposed Action and its reasonable alternatives. The Airport Authority, the FAA, and the USACE reviewed various alternatives and went through a deliberative process to identify the Proposed Action, reasonable alternatives and their respective impacts. No revisions to the Draft EA were necessary to respond to this comment.</p>
5.11	<p>Staff at the poster presentation told me that none of the waters in the area of the proposed runway drain into Umstead State Park. That is false. These waters drain into the Brier Creek Reservoir and Brier Creek which then drain into Umstead State Park via Lake Crabtree.</p>	<p>Resources including surface water (wetlands, streams, lakes etc.), groundwater, and floodplains, do not function as separate and isolated components of the watershed, but rather as a single, integrated natural system. Chapter 4, Section 4.13 Water Resources presents the analysis of potential impacts to water resources as a result of the Future No Action Alternative and the Proposed Action. The existing conditions for water resources are discussed in Chapter 3, Section 3.13 Water Resources. Impacts to water resources are expected to include wetlands, streams, and other surface waters which can impact downstream waters if not mitigated appropriately. The Proposed Action would require mitigation measures as described in Chapter 4, Section 4.13 Water Resources. With the mitigation measures, the Proposed Action would not result in significant impacts to wetlands, streams, and surface open waters. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.12	<p>William B. Umstead State Park began as a National Park Service (NPS), Department of the Interior (Park) in 1934. The Federal Park was called the Crabtree Creek Recreational and Demonstration Project, aimed to restore or redevelop sub-marginal agricultural land. William B. Umstead State Park was established in 1934 as a National Park by the National Park Service, US Department of Interior. The Park was sold to the State of North Carolina in 1943 for one dollar, with the National Park Service (NPS) making preservation a condition of the sale (Deed Restriction from the National Park Service).</p>	<p>Comment noted. As stated in Chapter 3, Section 3.5 Section 4(f) the Crabtree Creek Recreational Demonstration Area, now named the William B. Umstead State Park, is listed on the National Register of Historic Places (NRHP) and was identified as having a portion of William B. Umstead State Park within the GSA. This state park is a 4(f) resource because it is a recreational park of significance to the area, and it is also a 4(f) resource because it is listed on the NRHP. No revisions to the Draft EA were necessary to respond to this comment.</p>
5.13	<p>Users of William B. Umstead State Park have an expectation of a quiet natural forest recreational site. In fact, most of the William B. Umstead State Park have noise levels of 40-45dB. The exceptions are Park areas adjacent to the airport, I40 and US70. Additional noise from RDU Airport is not allowed, as that constitutes a “taking.” See attached for some of the protections of William B. Umstead State including National Register of Historic Places (NRHP), Federal Land and Water Conservation (LWCF, Section 6(f)), 1970 Everglades agreement, and Section 4(f). These protections need to be listed and recognized in the EA.</p>	<p>As a result of implementing the Proposed Action, the replacement Runway 5L/23R would be 537 feet northwest of the existing Runway 5L/23R which would influence the noise contours. As disclosed in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use and Appendix F Noise, with the implementation of the Proposed Action at RDU the noise contours are moved farther away from William B. Umstead State Park. Therefore, the William B. Umstead State Park would experience a net reduction in noise exposure due to the Proposed Action as compared to the future No Action Alternative. Based on these findings the William B. Umstead State Park would not be considered impacted by noise from the Proposed Action and would not require special consideration. No revisions to the Draft EA were necessary to respond to this comment.</p>
5.14	<p>The Umstead Coalition is focused upon serving and protecting William B. Umstead State Park. William B. Umstead State Park was established in 1934 and is one of most visited NC State Parks, many of which access the Park via the East Coast Greenway (in the Old Reedy Creek Road Recreational corridor) that connects Lake Crabtree County Park to William B. Umstead State Park. Like the airport, William B. Umstead State Park is a great community asset. William B. Umstead State Park and the Raleigh-Durham International Airport share 6.2 miles of common boundary.</p>	<p>Comment noted.</p>

RALEIGH-DURHAM INTERNATIONAL AIRPORT  
 ENVIRONMENTAL ASSESSMENT FOR THE  
 RUNWAY 5L/23R REPLACEMENT PROJECT

COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.15	William B. Umstead State has several Federal, State and local protective designations directly applicable to the areas in the Park now affected by the current and proposed Triangle quarry.	Comment noted. The Proposed Action does not include any proposed Triangle Quarry development. See Chapter 1, Purpose and Need for a description of the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.
5.16	A majority of acres within William B. Umstead State Park is a component and has protection as a Dedicated Nature Preserve. The boundary of the forested acres is highlighted in page 5 of the Park’s general management plan (GMP). The acres in the Park included in the Dedicated Nature Preserve include the majority of the Park’s formal and informal trails. Three-fifths majority of the General Assembly is required to add or remove land from such preserves. Related, there is nothing in the NC Statutes that prevents hiking off-trail within William B. Umstead State Park. Off-trail hiking is common in William B. Umstead State Park, as well as the rest of the NC State Parks.	Comment noted.
5.17	The boundary of the North Carolina Natural Heritage Area dedicated lands for William B. Umstead State Park are similar to the lands included in the NC State Nature Preserve.	Comment noted. The North Carolina Natural Heritage Area website was reviewed at <a href="https://www.nconemap.gov/maps/NC::north-carolina-natural-heritage-program-managed-areas/explore?location=35.859272%2C-78.747902%2C12.92">https://www.nconemap.gov/maps/NC::north-carolina-natural-heritage-program-managed-areas/explore?location=35.859272%2C-78.747902%2C12.92</a> . There are no Dedicated Nature Preserves, Registered Heritage Areas, or Conservation Easements within the Proposed Action limits of disturbance. No revisions to the Draft EA were necessary to respond to this comment.
5.18	William B. Umstead State Park is protected under the <i>Constitution of the State of North Carolina, Article XIV, Section 5</i> .	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.
5.19	The North Carolina General Assembly passed the <i>Environmental Policy Act of 1971</i> “to ensure that an environment of high quality will be maintained for the health and well-being of all...”	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
5.20	<p>The section of William B. Umstead State Park adjacent to the RDU Airport is a popular area for hikers and nature lovers and is easily accessible from the Old Reedy Creek Road corridor. Wake County Commissioners and the Airport Authority executed a 10-year lease in December 2022 for mountain bike and pedestrian trails on an adjacent 151-acre forested tract known as “286 East”. This tract is adjacent to William B. Umstead State Park and the East Coast Greenway. The Old Reedy Creek Recreational Area is a vital greenway, vital greenway connector, and one of the most heavily used recreational corridors in the region. The “road” is THE official greenway. The Old Reedy Creek Road is not only heavily used by hikers, runners, and bikers as the connecting hub for the Triangle Regional Greenways, it also has official designation as being part of the route for State and Federal Greenway trail systems.</p>	<p>Comment noted. No revisions to the Draft EA were necessary to respond to this comment.</p>
5.21	<p>The FAA should be mindful of the fact that the public overwhelmingly wants to protect William B. Umstead State Park. This unique treasure, deeply valued by locals and visitors to the area alike, is an irreplaceable oasis.</p>	<p>Comment noted. No revisions to the Draft EA were necessary to respond to this comment.</p>
5.22	<p>The Park has a stated goal of expanding the border to I-40 for the purposes of protecting the Park. This expansion was and still is parallel to the flow of the Airport. Specifically, Odd Fellows and the 286 area have been on the Park acquisition list since 1935.</p>	<p>Comment noted. No revisions to the Draft EA were necessary to respond to this comment.</p>
<b>6</b>	<b>NOISE</b>	

COMMENT #	SUMMARY OF COMMENT	RESPONSE
6.1	<p>The William B Umstead State Park started as a National Park Service national park. It is protected under not only the 4(f), which is a national register of historic places, North Carolina State Historic Preservation Act. It's a North Carolina nature preserve, and it's protected by the LWCF. All of those characteristics, including deed restriction and its applicability to the Everglades. 1970s noise taking of 55 LDM is applicable to William B Umstead State Park. The draft EA should be required to have 55 day-night average sound level (DNL) contours and information applicable to this park. It has all of those federal protections and so those need to be added.</p>	<p>This EA follows the methodology and significance criteria included in FAA Order 1050.1F and 5050.4B. According to FAA Order 1050.1F, the FAA's significance threshold for noise is if the Proposed Action would increase noise by DNL 1.5 decibels (dB) or more for a noise sensitive area that is exposed to noise at or above the 65 DNL noise exposure level, or that will be exposed at or above the 65 DNL noise exposure due to a DNL 1.5 dB or greater increase, when compared to the No Action Alternative for the same timeframe. The William B. Umstead State Park would be subject to land use compatibility guidelines within 14 CFR part 150, Appendix A, Table 1. This table states that parks, including state parks and Section 4(f) properties are compatible with noise levels below 65 DNL. As a result of implementing the Proposed Action, the replacement Runway 5L/23R would be 537 feet northwest of the existing Runway 5L/23R which would influence the noise contours. As disclosed in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use and Appendix F Noise, with the implementation of the Proposed Action at RDU the noise contours are moved farther away from William B. Umstead State Park. Therefore, the William B. Umstead State Park would experience a net reduction in noise exposure due to the Proposed Action as compared to the future No Action Alternative. Based on these findings the William B. Umstead State Park would not be considered impacted from noise by the Proposed Action and would not require special consideration. Additional text was added in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use to clarify.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
6.2	I have concerns about the airport using and cutting trees. The reason for that is that there will be additional noise occurring where the commenter lives.	<p>Comment noted. It is unclear where the commenter lives. It is possible that the Proposed Action would result in additional noise from construction and operation. Construction noise from the cutting of trees would be temporary. However, at least 100 feet of vegetation at the borrow sites would remain in place as a buffer to minimize construction noise.</p> <p>Aviation noise would come from above the trees and would not be affected by tree cutting. Homes that are within the 65 DNL and would experience a 1.5 or greater dB increase would be offered sound insulation and in the case of the mobile home an offer of acquisition and relocation assistance. See Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use and Appendix F Noise for detailed mitigation for operational noise impacts. No revisions to the Draft EA were necessary to respond to this comment.</p>
6.3	Can you tell me if my home at 130 Satterfield Circle will have less or more noise due to the runway?	<p>The residence at 130 Satterfield Circle, Apex NC 27523 is not within the 65+DNL noise contour for the future No Action Alternative or the Proposed Action alternative. It would remain a compatible land use. Beyond this information, there is no available data on whether its noise levels would increase. Please refer to Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use, Exhibit 4-8 to see the No Action noise levels for the area around the airport in 2033, and Exhibit 4-9 for the Proposed Action noise levels around the airport in 2033. No revisions to the Draft EA were necessary to respond to this comment.</p>

<p>6.4</p>	<p>Exhibit 3-11 shows composite noise contours that are substantially different than noise levels shown in Exhibit 3-12 and Section 4.10 exhibits. The public needs a full explanation of these different representations of noise, and the EA must be modified consistent with that explanation.</p>	<p>In the early 1990's, the Airport Authority developed a set of composite noise contours to depict the noise environment around RDU. The contours developed in the early 1990's are shown on Exhibit 3-11. The composite noise contours led to the development of airport overlay districts by local municipalities to supplement underlying zoning that regulates residential, commercial, industrial, and other land uses. The airport overlay districts are used by the City of Raleigh, the Town of Morrisville, Town of Cary, and Durham County to apply land use restrictions in areas near RDU to ensure that future land use and development within a geographic area is compatible with airport activities. The composite contours were based on data including number and type of operations in the early 1990's.</p> <p>As stated in the EA, the existing conditions (Exhibit 3-12) and future noise contours (Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use exhibits) were prepared using the FAA's Aviation Environmental Design Tool (AEDT) Version 3d. Inputs to the AEDT are based on current information (not information from the 1990's) and include runway definition, number of aircraft operations during the time period evaluated, the types of aircraft flown, the time of day when they are flown, how frequently each runway is used for arriving and departing aircraft, the routes of flight used when arriving to and departing from the runways, and departure profiles.</p> <p>The 1990's composite contours are provided in the EA for informational purposes only. There have been significant improvements in the design of aircraft and their engines since the 1990's that have led to a decrease in the size of noise contours as the newer aircraft have become quieter. The determination of significant noise impacts is based on the most up to date information. No revisions to the Draft EA were necessary to respond to this comment.</p> <p>A full discussion of the composite contours vs. the existing conditions and future noise contours is provided in the EA in</p>
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RALEIGH-DURHAM INTERNATIONAL AIRPORT  
 ENVIRONMENTAL ASSESSMENT FOR THE  
 RUNWAY 5L/23R REPLACEMENT PROJECT

COMMENT #	SUMMARY OF COMMENT	RESPONSE
		Chapter 3 Section 3.8 Land Use and 3.10 Noise and Noise-Compatible Land Use and Appendix F Noise.
6.5	The Proposed Action farther away from the borders of William B Umstead State Park will benefit the park's wildlife and human visitors by reducing noise pollution.	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.
6.6	The FAA National Environmental Policy Act (NEPA) compliance guidance (FAA 1050.1E) gives special consideration to the evaluation of the significance of noise impacts on noise-sensitive areas within national parks, national wildlife refuges [sic] and historic sites and states that 14 Code of Federal Regulations (CFR) Part 150 Land Use Compatibility Guidelines and the DNL 65 decibel (dB) threshold of significance for noise do not adequately address the effects of noise on visitors to areas where other noise is low and a quiet setting is a generally recognized purpose and attribute.	<p>This EA follows the methodology and significance criteria included in FAA Order 1050.1F and 5050.4B. The EA evaluates potential environmental impacts to U.S. Department of Transportation (DOT) Section 4(f) resources. The EA evaluates potential environmental impacts to resources in the Detailed Study Area and the General Study Area, including public lands such as parks, historic/cultural sites, recreation areas, and wildlife refuges and sanctuaries.</p> <p>For potential noise impacts, the William B. Umstead State Park would be subject to land use compatibility guidelines within 14 CFR part 150, Appendix A, Table 1. This table states that parks, including state parks and Section 4(f) properties are compatible with noise levels below 65 DNL. As a result of implementing the Proposed Action, the replacement Runway 5L/23R would be 537 feet northwest of the existing Runway 5L/23R which would influence the noise contours. As disclosed in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use and Appendix F Noise, with the implementation of the Proposed Action at RDU the noise contours are moved farther away from William B. Umstead State Park. Therefore, the William B. Umstead State Park would experience a net reduction in noise exposure due to the Proposed Action as compared to the future No Action Alternative. Based on these findings the William B. Umstead State Park would not be considered impacted from noise by the Proposed Action.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
6.7	<p>The FAA NEPA compliance guidance gives special consideration to the evaluation of the significance of noise impacts on noise-sensitive areas within national parks, national wildlife refuges [sic] and historic sites and states that 14 CFR Part 150 Land Use Compatibility Guidelines and the DNL 65 dB threshold of significance for noise do not adequately address the effects of noise on visitors to areas where other noise is low and a quiet setting is a generally recognized purpose and attribute.</p>	<p>As disclosed in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use and Appendix F Noise, with the implementation of the Proposed Action at RDU the noise contours are moved farther away from William B. Umstead State Park. Therefore, the William B. Umstead State Park would experience a net reduction in noise exposure due to the Proposed Action as compared to the future No Action Alternative. Based on these findings the William B. Umstead State Park would not be considered impacted by the Proposed Action and would not require special consideration. See response to Comment 6.1. No revisions to the Draft EA were necessary to respond to this comment.</p>
6.8	<p>William B. Umstead State Park users enjoy the Park for hiking, running, nature appreciation, tranquility, biking, picnicking, bird watching and more. There is an expectation for quiet in a natural setting.</p>	<p>Comment noted. The Proposed Action will move noise from the relocated Runway 5L/23R further away from William B. Umstead State Park. No revisions to the Draft EA were necessary to respond to this comment.</p>
6.9	<p>All the exhibits in section 4.10 and the noise analysis at appendix F must be modified to reflect the 55 DNL threshold on the park side of the airport. It is likely that both alternatives result in significant adverse effects on areas of the Park. Some of those impacts may be grandfathered from mitigation, but the effects are documented. This EA should properly document noise impacts to the park.</p>	<p>See response to Comment 6.1.</p>
<b>7</b>	<b>BIOLOGICAL RESOURCES</b>	

<p>7.1</p>	<p>I am hopeful that care be taken for wildlife even if it's not on the endangered species list, that water sources will also be protected as much as possible, and that a strong plan for replanting any areas that might be deforested will be developed and complete.</p>	<p>As described in Chapter 4 Section 4.3 Biological Resources, FAA Order 1050.1F states that a significant impact to biological resources (including fish, wildlife, and plants) would occur when the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) determines that the action would be likely to jeopardize the continued existence of a federally-listed threatened or endangered species, or would result in the destruction or adverse modification of federally-designated critical habitat. FAA Order 1050.1F also references factors that should be considered when determining if a project has significant impacts to biological resources. These factors are provided below:</p> <ul style="list-style-type: none"> <li>• A long-term or permanent loss of unlisted plant or wildlife species (i.e., extirpation of the species from a large project area);</li> </ul> <p>The Proposed Action would remove up to 480 acres of forested area. The total 480 acres of forested areas that would be removed are comprised of three primary forest types: mixed/pine hardwood forest, pine-dominant forest, and hardwood forest (altered). After vegetation and trees are removed and the fill material is excavated for the Proposed Action, the area would be graded and planted with appropriate native ground cover vegetation approved by NCDEQ to prevent erosion.</p> <p>Loss of this forested area is likely to push wildlife onto adjacent areas that would remain forested. The Airport Authority would leave 100 feet of the existing trees and vegetation in place as a buffer. This would help provide wildlife a remaining functional corridor to other forested areas. Most wildlife in the impact area would respond to the disturbance by relocating to other forested areas. There would be mortality of non- or low-mobile species that are not able to relocate; however, these species are not endangered or threatened. These species also have a robust</p>
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COMMENT #	SUMMARY OF COMMENT	RESPONSE
		<p>population in the region and therefore would not be significantly impacted.</p> <ul style="list-style-type: none"> <li>• Adverse impacts to special status species (e.g., state species of concern, species proposed for listing, migratory birds, bald and golden eagles) or their habitats;</li> </ul> <p>As described in Chapter 4 Section 4.3 Biological Resources, one bald eagle nest was identified, approximately 1,900 feet north of the existing Runway 5L/23R. In their letter dated November 15, 2022, USFWS agreed that the project is not likely to disturb nesting bald eagles if the mitigation measures as described in the EA are taken. In addition, there were some state species of concern that were found within the nearby area. However, these species were determined to not be impacted.</p> <ul style="list-style-type: none"> <li>• Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations; or</li> </ul> <p>The Proposed Action would increase forest fragmentation in the area by cutting down approximately 480 acres of contiguous forest at the borrow site and adjacent to the proposed replacement runway. The Airport Authority would leave 100 feet of the existing trees and vegetation in place around the perimeter of the borrow sites as a buffer area and to provide a functional wildlife corridor. Most wildlife in the impact area would respond to the disturbance by relocating to other large, forested areas nearby. There would be mortality of non- or low-mobile species that are not able to relocate; however, these species are not endangered or threatened. These species also have a robust population in the region and therefore would not be significantly impacted. As described in Chapter 4 Environmental</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
		<p>Consequences and Mitigation Measures, the Proposed Action would result in unavoidable impacts to identified wetlands and surface open waters including streams. Total avoidance of potential environmental impacts is not practicable due to the purpose and need of the project. However, with the implementation of the special conditions and mitigation measures, no environmental thresholds of significance were exceeded for the Proposed Action. The Proposed Action does include the requirement to complete an erosion and sediment control plan. The plan, which would be approved by the NCDEQ prior to construction activities would require the area that is disturbed be graded and planted with appropriate native ground cover vegetation to prevent erosion.</p> <ul style="list-style-type: none"> <li>Adverse impacts on a species' reproductive success rates, natural mortality rates, non-natural mortality (e.g., road kills and hunting), or ability to sustain the minimum population levels required for population maintenance.</li> </ul> <p>In order to minimize the impact, the Airport Authority would leave 100 feet of the existing trees and vegetation in place as a buffer around the borrow areas. This would help provide wildlife a remaining functional corridor to other forested areas. Most wildlife in the impact area would respond to the disturbance by relocating to other forested areas. There would be mortality of non- or low-mobile species that are not able to relocate; however, these species are not endangered or threatened. These species also have a robust population in the region and therefore would not be significantly impacted.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
7.2	<p>U.S. Fish and Wildlife Service (USFWS) recommends that more detail be provided in Section 4.3 (Biological Resources), particularly information regarding the bald eagle nest and tricolored bats. For the bald eagle this includes noise impacts to bald eagles and distance from eagles' nest to borrow/blasting areas. For the tricolored bat this includes that a bat was captured in Umstead State Park and that USFWS has requested surveys be conducted to help identify the presence of the bat.</p>	<p>More detail was added in Chapter 3 Section 3.3 Biological Resources and Chapter 4 Section 4.3 Biological Resources in the Final EA to address USFWS's comment on the Bald Eagle and Tricolored Bat.</p> <p>For the bald eagle, this includes disclosing that the potential noise level at the bald eagle nest was assessed. (See also Appendix D Biological Resource Assessment Table 3 and Appendix F Noise for additional information). The existing noise at the bald eagle's nest was 63.81 Day-Night Average Sound Level (DNL); measured in decibel level (dBA), which is to approximate the way the human ear hears. In 2028 with the No Action Alternative the noise level at the bald eagle nest would increase to 64.4 DNL dBA. The Proposed Action would increase the noise level to 67.08 DNL dBA. In 2033 with the No Action Alternative, the noise level at the bald eagle nest would increase to 64.85 DNL dBA. The Proposed Action would increase the noise level to 67.5 DNL dBA.</p> <p>For the tricolored bat, this includes disclosing in the Final EA that a Tricolored Bat was captured by mist-net in 2002 in William B. Umstead State Park, about 3.5 miles from the project site. A survey to determine the presence or absence of the tricolored bat for this EA was conducted in March 2023. No tricolored bats or evidence of bats were observed in the survey areas. See Appendix D for the full survey report.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
7.3	Additional minimization measures such as scheduled blasting and work closest to the nest be conducted outside of the December to July timeframe would further reduce potential impacts to nesting bald eagles.	Comment noted. The Airport Authority will prepare and implement a Blasting Plan to ensure not only the safety of people in the area, but also to prevent property damage from the activity. The Blasting Plan would be in compliance with all applicable federal, state, and local laws and regulations and the Airport Authority would obtain all required federal, state, and local blasting-related permits. While blasting would not be restricted to any specific time of the year, the borrow area and the location of potential blasting would be more than 0.5 miles from the eagle’s nest, which complies with the recommendations in the National Bald Eagle Management Guidelines to “avoid blasting and other activities that produce extremely loud noises within 1/2 mile of active nests”. Final design for the Proposed Action is not yet complete; therefore, the exact number and location of blasting activities is not yet known, however the closest distance from the eagle’s nest across the reservoir and Aviation Parkway to the borrow sites is approximately 0.60 miles. No revisions to the Draft EA were necessary to respond to this comment.
7.4	The forested buffer around the borrow sites should be maximized to the greatest extent practicable and should be highlighted on the construction plans to prevent over clearing. Furthermore, developing a reforestation plan for the borrow sites would help mitigate for lost habitat.	The Airport Authority would leave 100 feet of the existing trees and vegetation in place around the perimeter of the borrow sites as a buffer area and to provide a functional wildlife corridor. The areas within the 100 foot buffer for truck access will be replanted with trees of similar species to either side of the access, after removal of the borrow material from the borrow site. Final design for the Proposed Action is not yet complete. The Airport Authority, through their construction contractor, would make sure the buffer area is marked off on the construction plans to prevent over clearing. An Erosion and Sedimentation Control (ESC) Plan would be developed and approved by the NCDEQ prior to construction. The Airport Authority would obtain approval of the ESC Plan from the NCDEQ. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
7.5	As planning and design for the project continues, further avoidance and minimization of natural resources in the project area should be incorporated. Such as reduction in wetland and stream impacts, minimizing tree clearing limits and maximizing vegetated buffer widths.	Comment noted. Final design for the Proposed Action is not yet complete. Potential further avoidance and minimization opportunities would be identified during the permitting process for the Proposed Action. It will be the Airport Authority's responsibility to apply for and obtain permits required by the USACE and the State for the Proposed Action including the 404 and 401 permits respectively. These permits must be obtained prior to any construction that would impact these water resources. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
7.6	<p>The EPA recommends that all conservation measures identified by USFWS be implemented. Forest planting and stream protection and renewal should take place in areas of temporary disturbance.</p>	<p>Comment noted. The USFWS stated that their previous comments and recommendations have already been incorporated into the Draft EA. However, in the comments on the Draft EA they recommended that more detail be provided in Chapter 4 Section 4.3 Biological Resources, particularly information regarding the bald eagle nest and tricolored bats. More detail was added in Chapter 3 Section 3.3 Biological Resources and Chapter 4 Section 4.3 Biological Resources in the Final EA to address USFWS's comment on the Bald Eagle and Tricolored Bat.</p> <p>As stated in Chapter 4 Section 4.3 Biological Resources, an Erosion and Sedimentation Control (ESC) Plan would be developed and approved by the NCDEQ prior to construction. The Airport Authority would obtain approval of the ESC Plan from the NCDEQ.</p> <p>The Proposed Action would remove up to 480 acres of forested area. As part of the Proposed Action at least 100 feet of vegetation and trees at the borrow sites would remain in place as a buffer and functional wildlife corridor. The areas within the 100 foot buffer for truck access will be replanted with trees of similar species to either side of the access, after removal of the borrow material from the borrow site. The Airport Authority has not determined any long-term use for the borrow site areas. Disturbed areas will be seeded or mulched to stabilize the soil and appropriate ground cover with native species approved by NCDEQ will be planted.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
7.7	<p>We have that (undeveloped) land, and at this time it makes the most environmental and economic sense to keep the trees that we already have, to protect them by law and to find ways to build where there are not presently forests and waterways that need to be healthy to keep our environment healthy.</p>	<p>Comment noted. The FAA has identified the Proposed Action as the Environmentally Preferred Alternative. In identifying the Environmentally Preferred Alternative, the FAA considered the ability of each alternative to meet the purpose and need for the project, the Airport Authority's goals and objectives, and the potential environmental impacts. The USACE will determine the least environmentally damaging practicable alternative (LEDPA) as part of the CWA Section 404 permitting process. No revisions to the Draft EA were necessary to respond to this comment.</p>
7.8	<p>Preserve and protect all of the forested areas and creeks and waters that will be impacted by RDUAA. This is about preserving resources that cannot be replaced for generations to come. I am deeply concerned about loss of forested land, and the negative environmental impact to any of this area.</p>	<p>Comment noted. As described in Chapter 4 Environmental Consequences and Mitigation Measures, the Proposed Action would result in unavoidable impacts to identified forested areas, wetlands, and surface open waters including streams. Total avoidance of potential environmental impacts is not practicable due to the amount of fill needed for the project. As part of the Proposed Action at least 100 feet of vegetation and trees at the borrow sites would remain in place as a buffer and a functional corridor. The areas within the 100 foot buffer for truck access will be replanted with trees of similar species to either side of the access, after removal of the borrow material from the borrow site. Disturbed areas will be seeded or mulched to stabilize the soil and appropriate ground cover with native species approved by NCDEQ will be planted. With the implementation of the special conditions and mitigation measures, no environmental thresholds of significance were exceeded for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>

<p>7.9</p>	<p>Raleigh/Durham is growing like crazy. We need all the dense green/forested land we can get or protect to balance the booming growth. Our heat islands are no longer islands. Recent studies show lots of bright red hot spots.</p>	<p>Comment noted. The Airport Authority does not control growth off-Airport property. The Proposed Action would remove up to 480 acres of forested area on Airport property. As part of the Proposed Action at least 100 feet of vegetation and trees at the borrow sites would remain in place as a buffer and functional wildlife corridor. The areas within the 100 foot buffer for truck access will be replanted with trees of similar species to either side of the access, after removal of the borrow material from the borrow site. In addition, after vegetation and trees are removed and the fill material is excavated, the area would be graded and planted with appropriate native species ground cover vegetation approved by NCDEQ to prevent erosion. The Proposed Action does not include any permanent impervious surfaces at the borrow sites.</p> <p>However, the Proposed Action would increase the impervious surfaces at the Airport due to the relocation of the runway and conversion of the existing runway to a taxiway. An element of the Proposed Action provides additional drainage infrastructure for additional impervious pavement areas associated with the relocated runway. Existing stormwater drainage pipes would be replaced/rehabilitated under the existing runway and connected to new infrastructure for the relocated runway. Existing stormwater retention areas would be modified and or increased and new stormwater retention areas added as needed to maintain storage and accommodate increases in peak stormwater runoff. A graphic and additional text was added to the Final EA in Chapter 1 Purpose and Need to identify the potential location of the modifications/additions to the stormwater retention areas.</p> <p>According to USEPA, heat islands are urbanized areas that experience higher temperatures than outlying areas. Structures such as buildings, roads, and other infrastructure absorb and re-emit the sun's heat more than natural landscapes such as forests and water bodies. An increase in impervious surface and decrease in tree canopy can contribute to the urban heat island effect. Urban heat islands may contribute to local climate change.</p>
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COMMENT #	SUMMARY OF COMMENT	RESPONSE
		<p>The impacts from urban heat islands and global climate change are often similar. See Chapter 4 Section 4.4 Climate for a discussion of climate. While there is an increase in concrete with the Proposed Action that could increase the retention of heat and urban heat island effects, the area surrounding the Airport has protected areas that will remain undeveloped and would thus ameliorate any potential increase in temperatures. There are no thresholds for climate in general and none relating to heat islands. However, any temperature increases related to the replacement runway would be expected to be limited to the Airport boundary and not affect local residences because of the distance between the runway and nearest residence and the intervening vegetated buffer.</p>
7.10	<p>RDU is proposing extensive clearing as noted in 4.3.3.2 "The Proposed Action has the potential to remove up to 480 acres of forested area."</p>	<p>The Proposed Action would remove up to 480 acres of forested area on Airport property. Total avoidance of potential environmental impacts is not practicable due to the amount of fill needed for the project. The Airport Authority would leave 100 feet of the existing trees and vegetation in place as a buffer. The areas within the 100 foot buffer for truck access will be replanted with trees of similar species to either side of the access, after removal of the borrow material from the borrow site. As described in Chapter 4, Section 4.3 Biological Resources, this would help provide wildlife a remaining functional corridor to other forested areas. Most wildlife in the impact area would respond to the disturbance by relocating to other forested areas. With the implementation of the buffer and the other special conditions and mitigation measures identified in Chapter 4 Section 4.3.5 Biological Resources, Mitigation, Avoidance, and Minimization Measures, no environmental thresholds of significance were exceeded for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>

<p>7.11</p>	<p>The EA does not consider the net loss of property value or the substantial cost of mitigation for impacts to wetlands and streams once deforested and mined for fill.</p>	<p>Per FAA Order 1050.1F, <i>Environmental Impacts: Policies and Procedures</i>, the EA does consider potential socioeconomic impacts of the Proposed Action including whether the project would induce substantial economic growth; divide or disrupt an established community; cause extensive relocation of housing when sufficient replacement housing is unavailable; cause extensive relocation of businesses that would cause economic hardship; disrupt local traffic patterns and substantially reducing the levels of service of roads serving an airport and its surrounding communities; or produce a substantial loss of the community tax base.</p> <p>The Airport does not currently have a noticeable negative effect on property value. Even though the announcement of the Proposed Project started back in 2018 with the commencement of an EIS, there has been continued population growth in the Raleigh area and in the area around the Airport and demand for housing has steadily increased. According to the US Census Bureau, the population of Wake County has increased 7.3% between 2017 to 2021 and census tracts that surround RDU have increased by 26.7% within that same time.<sup>2</sup> Housing values have continued to rise in Wake County by an average of 36.4% from 2017 to 2021 (US Census Bureau) due to availability of supply and the high demand. According to Realtor.com, within Raleigh itself, the average listing price for a home was \$499,000 in May of 2023. The area surrounding the airport is no exception, with data from the US Census Bureau showing a 70% increase in housing value from 2017 to 2021 in census tracts adjacent to RDU. The Proposed Action apparently has not resulted in a net loss of property value. There is currently no evidence that the planning and public announcements of this Proposed Action has adversely affected property values.</p> <p>As disclosed in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use, there would be 248 total housing units within the 65+DNL for the No Action Alternative in 2033. There would be 134 total housing units within the 65+DNL for the Proposed Action in 2033. Overall, the Proposed Action would</p>
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 RUNWAY 5L/23R REPLACEMENT PROJECT

COMMENT #	SUMMARY OF COMMENT	RESPONSE
		<p>result in 114 fewer housing units and 296 fewer estimated people within the 65+DNL as compared to the No Action Alternative. For the purposes of mitigating the significant noise impacts (&gt;1.5 dB increase within the DNL 65), the Airport Authority would offer to sound insulate 36 single-family housing units, the Raleigh Fire Station #29, and the Sorrell Grove Baptist Church (if the buildings are eligible and the owners agree) under FAA Order 5100.38D. In addition, one mobile home unit is located within the future DNL 65 and within the area of significant noise increase. Since mobile homes cannot be effectively sound insulated due to the type of construction, the Airport Authority would offer to acquire the owner’s mobile home and/or property. Residents of the mobile home would also be offered relocation assistance under the Uniform Relocation Assistance and Real Property Acquisition Act of 1970. The relocation would be up to the mobile home property owner and not mandatory as part of the Proposed Action. The Proposed Action would not cause businesses to relocate, on or off-Airport.</p> <p>Because there are potential and unavoidable impacts to wetlands, mitigation will be required for the Proposed Action to avoid significant impacts. The conceptual mitigation plan is to use wetland banking and/or in lieu fee programs offered by NCDEQ Division of Mitigation Services to mitigate for these identified impacts. A determination of the exact mitigation banks, the final required credits, and or the cost for in lieu fee programs will be determined in the permitting process. No revisions to the Draft EA were necessary to respond to this comment.</p>

<sup>2</sup> (Census Tracts used: 524.01, 525.09, 535.12, 535.21, 535.22, 536.08, 536.09, 536.11, 536.12, 536.13, 536.14, 536.15, 537.17, 537.18, 537.19, 537.24, 537.25, 537.26, 537.27, 537.28, 9801, and 9802 of Wake County)



COMMENT #	SUMMARY OF COMMENT	RESPONSE
<b>8</b>	<b>AIR QUALITY</b>	
8.1	<p>I'm very concerned that the hundreds of acres of mature forest that are slated to be removed from the lands that RDU airport manages. RDU will be removing so many trees and so much wildlife in our time of climate change when many communities and countries around the world are struggling to plant trees to gain forested land.</p>	<p>Comment noted. The Proposed Action would remove up to 480 acres of forested area on Airport property. The Airport Authority would leave 100 feet of the existing trees and vegetation in place as a buffer. The areas within the 100 foot buffer for truck access will be replanted with trees of similar species to either side of the access, after removal of the borrow material from the borrow site. This would help provide wildlife a remaining functional corridor to other forested areas. Most wildlife in the impact area would respond to the disturbance by relocating to other forested areas. The FAA has not identified specific factors to consider in making a significance determination for climate change. See Chapter 4 Section 4.4 Climate for a discussion of potential climate impacts. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
8.2	The air is going to be changed with the fact more airplanes and more cars are coming to the airport. There are also more parking lots. The particulates in the air would be more.	As provided in Chapter 1 Purpose and Need, the Proposed Action does not include the development of any parking lots. There will be more aircraft operations in the future with both the No Action Alternative and the Proposed Action alternative as compared to the existing conditions. An analysis of the potential for significant adverse air quality impacts, including from particulate matter, resulting from the Future No Action Alternative and the Proposed Action was conducted. There would be an increase in net emissions due to construction activities associated with the Proposed Action as compared to the No Action Alternative. There would also be an overall increase in operational emissions with the Proposed Action compared to the No Action Alternative due to increased aircraft taxiing and motor vehicle operations from the relocated runway and relocated Lumley Road, respectively. However, the relevant federal <i>de minimis</i> thresholds would not be exceeded for the Proposed Action on any analysis year. Therefore, because the emissions increase is considered <i>de minimis</i> or insignificant, no significant adverse impact on local or regional air quality is expected by construction and implementation of the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
8.3	<p>The EPA recommends implementing Best Management Practices (BMP) to reduce diesel emissions, such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training or contracting policies. The EPA also encourages reducing fugitive dust and diesel emission by implementing the conveyor belt system that RDU has evaluated for transporting fill material for this project and operating the conveyor through the electrical grid, where practicable.</p>	<p>The Airport Authority will ensure that measures are taken to reduce fugitive dust emissions by adhering to guidelines included in FAA Advisory Circular (AC) 150/5370-10H, Standard Specifications for Construction of Airports. In addition to the methods identified in FAA AC 150/5370-10H, the Airport Authority would look to utilize alternatively fueled equipment and reduce the idling time on equipment to minimize potential air quality impacts.</p> <p>The Airport Authority is still reviewing the potential use of a conveyor system to transport the fill material to the site of the relocated runway. The EA identifies the potential environmental impacts from both the conveyor system and the potential use of trucks to transport the fill. No significant environmental impacts were identified with either of these options. No revisions to the Draft EA were necessary to respond to this comment.</p>
8.4	<p>Because we are in the beginning of a long (forever) CLIMATE EMERGENCY, my groups want NO EXPANSION of runways.</p>	<p>Comment noted. The FAA has not identified specific factors to consider in making a significance determination for climate change. See Chapter 4 Section 4.4 Climate for the potential increase in GHG emissions due to the Proposed Action. As discussed in Chapter 1 Purpose and Need, the Proposed Action relocates the existing Runway 5L/23R. Therefore, there would be the same number of runways after the project as before the project. No revisions to the Draft EA were necessary to respond to this comment.</p>
<b>9</b>	<b>WATER RESOURCES</b>	

<p>9.1</p>	<p>Mitigation funds for impacted streams and wetlands should be done on-site and/or at adjacent land to William B. Umstead State Park and Crabtree Park because they are most impacted and are downstream of the Proposed Action. These mitigation funds should also be used to increase the width of forested protective buffers to protect William B. Umstead State Park. Mitigation funds should not be diverted to an off-site bank- we believe that is wrong.</p>	<p>Because there are potential and unavoidable impacts to wetlands and surface open waters including streams, mitigation will be required for the Proposed Action to avoid significant impacts.</p> <p>As provided in FAA Advisory Circular, 150/5200-33C <i>Hazardous Wildlife Attractants on or near Airports</i>, wetland mitigation must be designed so it does not create a wildlife hazard. The FAA recommends a separation distance from wetland mitigation projects that may attract hazardous wildlife of 10,000 feet for airports serving turbine-powered aircraft up to a distance of five miles to protect approach and departure airspace. Wetland banking and in lieu fee programs benefit airport projects, as wetland impacts mitigated outside of these separations can still be located within the same watershed.</p> <p>Therefore the conceptual mitigation plan for this project is to use stream and wetland banking and/or in lieu fee programs offered by NCDEQ Division of Mitigation Services to mitigate these identified impacts. The FAA allows stream and wetland banking as a mitigation tool for projects that must occur in streams and wetlands. Mitigation must comply with 33 CFR Part 332 and 40 CFR Part 230. The environmentally preferable compensatory mitigation may be provided through mitigation banks or in-lieu fee programs because they usually involve consolidating compensatory mitigation projects where ecologically appropriate, consolidating resources, providing financial planning and scientific expertise (which often is not practical for permittee-responsible compensatory mitigation projects), reducing temporal losses of functions, and reducing uncertainty over project success. Additional text was added to Chapter 4 Section 4.13 Water Resources to clarify and expand on the conceptual mitigation.</p> <p>While the habitat functions of wetlands and streams may be replaced in a mitigation bank or in-lieu fee program, erosion control measures on site would be utilized to prevent impacts such as erosion of sediment moving downstream. Construction sediment basins will be located at the borrow site and near the replacement runway to temporarily hold stormwater and prevent</p>
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COMMENT #	SUMMARY OF COMMENT	RESPONSE
		<p>erosion. Erosion control measures that meet the State's requirements will be conducted where earth disturbing activities will occur. Examples of these activities include use of seeding, silt fences, diversion ditches, check dams, sediment traps, sediment basins, inlet protection, and riprap outlet protection. With these mitigative measures impacts downstream are not expected to occur. Text was added to clarify general descriptions of the mitigation actions that are occurring onsite to reduce downstream impacts.</p>
9.2	<p>I'm concerned about the dirt borrow areas being left unseeded and exposed for runoff into streams and into our park. State laws are insufficient to control runoff. We need to go beyond the minimum standards of North Carolina and have phased grading and immediate reseeding, so we do not have exposed areas of dirt with sediment into our streams.</p>	<p>Comment noted. There is no requirement to go beyond applicable federal and state laws. The Airport Authority would comply with all applicable federal and state laws concerning erosion control. An Erosion and Sedimentation Control (ESC) Plan would be developed and approved by the NCDEQ prior to construction. Best management practices and erosion control measures will be identified to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact. The Airport Authority would obtain approval of the ESC Plan from the NCDEQ. Additional text was added to Chapter 4 Section 4.13 Water Resources to identify erosion and sediment control measures as well as to show general locations and designs of stormwater facilities.</p>
9.3	<p>You should coordinate with the town of Cary for the water in case we have a drought and they don't have the water.</p>	<p>As described in Chapter 1 Purpose and Need, if conditions occur such as a drought during construction activities, and water from Brier Creek Reservoir is not sufficiently available, it is anticipated that water would come from local municipal sources such as the Town of Cary. The Airport Authority would coordinate with the Town of Cary to determine how much water would be needed at that time and to ensure that potential water supplies for the town are not interrupted. The Town of Cary has already indicated they have water capacity to support the RDU Airport. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.4	We need a formal assessment as to how the Crabtree Creek watershed program project affects this project. Airport land is deeded to four owners, not to the Airport.	This EA presents the formal analysis of potential impacts to water resources as a result of the Future No Action Alternative and the Proposed Action. See Chapter 4, Section 4.13 Water Resources. The Airport Authority is a public authority created, established, and empowered by the North Carolina General Assembly pursuant to Chapter 168 of the Public-Local Laws of 1939, as amended. The Airport Authority is legislatively vested with the power and mandate to control, lease, maintain, improve, operate, and regulate RDU, with complete authority over the Airport. Coordination is ongoing with Wake County by the Airport Authority concerning the potential mitigation for the Proposed Action's impact on Brier Creek Reservoir. No revisions to the Draft EA were necessary to respond to this comment.
9.5	The runway project is basically taking away Brier Creek Reservoir and the taxpayer loses the Brier Creek Reservoir for future recreation. We should be compensated by keeping all the land that's now with Lake Crabtree County Park as forested and recreational.	As stated in Chapter 1 Purpose and Need, the Airport Authority plans to use water from Brier Creek Reservoir due to its proximity to the construction site. The water would be removed from Brier Creek Reservoir and applied to the fill material over a period of approximately two years to compact the soil. This process would also allow for Brier Creek Reservoir to be naturally recharged with water as the water removed infiltrates back into the groundwater thus recharging the reservoir. There would be no taking of the Brier Creek Reservoir from future recreation use and thus no compensation required. No revisions to the Draft EA were necessary to respond to this comment.
9.6	RDU could offset the millions of dollars of stream mitigation that they will for certain incur by releasing land such as Odd Fellows, Lake Crabtree County Park, 286 East, and the buffer area for 286 West to the NC State Park System and/or Wake County.	A land swap, an out of kind mitigation proposal, would not replace the loss of these potential streams and wetlands. Mitigation for potential stream and wetland impacts due to the Proposed Action must comply with 33 CFR Part 332 and 40 CFR Part 230. The Proposed Action does not include any release of Airport property. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.7	Will the withdrawal of 150 million gallons of water from Brier Creek Reservoir have the potential to disturb and mobilize contaminated sediments into Lake Crabtree?	<p>The Proposed Action includes the disturbance of a USEPA National Priorities List (NPL) superfund site. As a requirement of the Proposed Action, the Airport Authority must comply with all applicable federal and state laws concerning erosion control. An Erosion and Sediment Control Plan, approved by the NCDEQ, would be developed prior to construction. The ESC would identify best management practices and erosion control measures to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact. In addition, water to be used for the Proposed Action for hydrocompression would be collected near the surface of the water column in Brier Creek Reservoir to not disturb sediment to the extent practicable. To prevent the potential spread of environmental contamination during construction, a Materials Management Plan (MMP) would be required for construction activities at the NPL Site. The MMP would include procedures for construction worker health and safety, cuts and excavation, erosion and sediment control, soil management, fill and reconstruction, site security, traffic control, contact water, dust mitigation, and equipment decontamination. Per the restrictive covenants filed with the Wake County Register of Deeds, the MMP must be approved by the USEPA prior to beginning work onsite.</p> <p>The FAA has coordinated with the USEPA for this project. In a meeting on June 28, 2022, the USEPA stated there was no major concern with the use of water from Brier Creek for hydrocompression of the fill dirt material needed for project construction. Drawing of the water from the reservoir is not expected to have significant impacts to the sediment since the intake will be floating above the sediment. The USEPA's position was confirmed in an email dated November 1, 2022.</p> <p>No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.8	<p>The NC Division of Water Resources (NCDWR) Transportation Permitting Branch is responsible for the issuance of the Section 401 Water Quality Certification. Design plans shall provide treatment of the stormwater runoff through BMPs as detailed in the most recent version of the North Carolina Department of Transportation Stormwater Post-Construction Stormwater Program Manual, and the Best Management Practices Toolbox Manual. The BMPs should, to the maximum extent practicable, be selected and designed to reduce impacts of the target pollutants of concern (POCs) for the receiving waters.</p>	<p>The Airport Authority must apply for and obtain permits required by the USACE and the State for the Proposed Action including the 404 and 401 permits respectively prior to construction. This would be a condition of any authorization from FAA. Final design for the Proposed Action is not yet complete. Potential further avoidance and minimization opportunities would be identified during the permitting process for the Proposed Action. The condition has been added to this Final EA..</p>
9.9	<p>The EPA recommends that modifications to the existing airport stormwater management system, to account for the increase in impervious pavement, include measures to maintain existing stormwater runoff profiles of the project area. The EPA also recommends that BMPs identified by the Storm Water Pollution Prevention Plan be included in the final EA.</p>	<p>An element of the Proposed Action provides additional drainage infrastructure for additional impervious pavement areas associated with the relocated runway. Existing stormwater drainage pipes would be replaced/rehabilitated under the existing runway and connected to new infrastructure for the relocated runway. Existing stormwater retention areas would be modified and or increased and new stormwater retention areas added as needed to maintain storage and accommodate increases in peak stormwater runoff.</p> <p>The Airport Authority is designing the stormwater improvements to meet FAA guidance in AC 150/5320-5D Airport Drainage Design. A graphic and additional text was added to the Final EA in Chapter 1 Purpose and Need to identify the potential location of the modifications/additions to the stormwater retention areas. BMPs that would be included in the Storm Water Pollution Prevention Plan have also been added to Chapter 4 Section 4.13 Water Resources. During the permitting process and final design of the Proposed Action, additional BMPs may be identified.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.10	<p>NCDWR Permitting Branch comments that all area surface waters are class nutrient sensitive waters (NSW) of the State. The NCDWR is very concerned with sediment and erosion impacts that could result from this project. The NCDWR recommends that highly protective sediment and erosion control BMPs be implemented to reduce the risk of nutrient runoff to these surface waters. Post-construction stormwater BMPs should, to the maximum extent practicable, be selected and designed to reduce nutrients.</p>	<p>As a requirement of the Proposed Action, the Airport Authority must comply with all applicable federal and state laws concerning erosion control. An Erosion and Sediment Control Plan, approved by the NCDEQ, would be developed prior to construction. The ESC would identify best management practices and erosion control measures to control and contain runoff to reduce the risk of nutrient runoff to these surface waters. Additional text was added to Chapter 4 Section 4.13 Water Resources to identify erosion and sediment control measures and to identify the general locations of stormwater control features.</p>
9.11	<p>NCDWR Permitting Branch comments that Brier Creek, Little Brier Creek, Lake Crabtree, and all their tributaries are class 303(d) impaired waters of the State. The NCDWR is very concerned with sediment and erosion impacts that could result from this project. The NCDWR recommends that the most protective sediment and erosion control BMPs be implemented in accordance with Design Standards in Sensitive Watersheds (15A NCAC 04B .0124) or comparable BMPs to reduce the risk of further impairment to these surface waters. Post-construction stormwater BMPs should be selected and designed to the maximum extent practical (MEP), to reduce target POCs in the 303(d) list for the receiving waters.</p>	<p>As a requirement of the Proposed Action, the Airport Authority must comply with all applicable federal and state laws concerning erosion control. The Airport Authority will have an Erosion and Sediment Control (ESC) Plan, approved by the NCDEQ, prior to commencing construction. This is a condition of any FAA approval. The ESC Plan would identify best management practices and erosion control measures to control and contain runoff to reduce the risk of nutrient runoff to these surface waters. Additional text was added to Chapter 4 Section 4.13 Water Resources to identify sediment and erosion control BMPs to be implemented in accordance with Design Standards in Sensitive Watersheds (15A NCAC 04B .0124).</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.12	<p>NCDWR Permitting Branch comments that riparian buffer impacts shall be avoided and minimized to the greatest extent possible pursuant to 15A NCAC 2B.0714. New development activities located in the protected 50-foot wide riparian areas within the basin shall be limited to “uses” identified within and constructed in accordance with 15A NCAC 2B.0295. Buffer mitigation may be required for buffer impacts resulting from activities classified as “allowable with mitigation” within the “Table of Uses” section of the Buffer Rules or require a variance under the Buffer Rules. A buffer mitigation plan, including use of the North Carolina Division of Mitigation Services, must be provided to the NCDWR prior to approval of the Water Quality Certification.</p>	<p>Riparian buffers of streams protected under the State’s Neuse River Riparian Buffer Rules would be preserved to the greatest extent practicable. Stormwater runoff into the riparian buffer shall meet dispersed flow as defined in North Carolina rule 15A NCAC 02H.1002. It will be the Airport Authority’s responsibility to apply for and obtain permits required by the USACE and the State for the Proposed Action including the 404 and 401 permits respectively. These permits and the buffer mitigation plan must be obtained prior to commencing construction that would impact these water resources. Final design for the Proposed Action is not yet complete. Potential further avoidance and minimization opportunities would be identified during the permitting process for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.13	<p>NCDWR Permitting Branch comments that the environmental document and/or permit applications should provide a detailed and itemized presentation of the proposed impacts to wetlands and streams with corresponding mapping. If mitigation is necessary as required by 15A NCAC 2H.0506(h), it is preferable to present a conceptual (if not finalized) mitigation plan with the environmental documentation. Appropriate mitigation plans will be required prior to issuance of a 401 Water Quality Certification.</p>	<p>Chapter 4 Section 4.13 Water Resources and mapping in Appendix H Water Resources provides the proposed impacts to wetlands and streams in the limits of disturbance area. Conceptual mitigation is also provided in Chapter 4, Section 4.13 Water Resources. It will be the Airport Authority’s responsibility to apply for and obtain permits required by the USACE and the State for the Proposed Action including the 404 and 401 permits respectively. These permits must be obtained prior to any commencing construction that would impact these water resources. Final design for the Proposed Action is not yet complete. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during the permitting process for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.14	<p>NCDWR Permitting Branch states that environmental impact statement alternatives shall consider design criteria that reduce the impacts to streams and wetlands from storm water runoff. These alternatives should include designs that allow for treatment of the storm water runoff through best management practices as detailed in the most recent version of the North Carolina Department of Transportation Stormwater Best Management Practices Toolbox manual, which includes BMPs such as grassed swales, buffer areas, preformed scour holes, retention basins, etc.</p>	<p>A graphic and additional text was added to the Final EA in Chapter 1 Purpose and Need to identify the potential location of the modifications/additions to the stormwater retention areas. General BMPs that will be utilized in the project are identified in Chapter 4 Section 4.13 Water Resources.</p> <p>The Airport Authority and the FAA have shown in their alternatives analysis that there were no practicable alternatives that would meet the purpose and need which would avoid all adverse impacts to wetlands and streams. See Chapter 2 Alternatives for the discussion of alternatives. The Airport Authority then evaluated the use of the borrow sites for fill material to minimize potential adverse impacts. Total avoidance of wetland and stream impacts at the borrow site areas is not practicable due to the amount of fill needed for the project. Potential further avoidance and minimization opportunities including additional BMPs from the North Carolina Department of Transportation Stormwater Best Management Practices Toolbox manual would be identified during the permitting process for the Proposed Action.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.15	<p>NCDWR Permitting Branch comments that after the selection of the preferred alternative and prior to an issuance of the 401 Water Quality Certification, the applicant is respectfully reminded that they will need to demonstrate the avoidance and minimization of impacts to wetlands (and streams) to the maximum extent practical. In accordance with the Environmental Management Commission's Rules (15A NCAC 2H.0506[h]), mitigation will be required for impacts of greater than 1 acre to wetlands. In the event that mitigation is required, the mitigation plan shall be designed to replace appropriate lost functions and values. The North Carolina Division of Mitigation Services may be available to assist with wetland mitigation.</p>	<p>The FAA has identified the Proposed Action as the Environmentally Preferred Alternative. In identifying the Environmentally Preferred Alternative, the FAA considered the ability of each alternative to meet the purpose and need for the project, the Airport Authority's goals and objectives, and the potential environmental impacts. The USACE will determine the least environmentally damaging practicable alternative (LEDPA) as part of the CWA Section 404 permitting process. Impacts to wetlands from the Proposed Action would exceed 1 acre as disclosed in Chapter 4 Environmental Consequences and Mitigation Measures. The conceptual mitigation plan is to use wetland banking and/or in lieu fee programs offered by NCDEQ Division of Mitigation Services to mitigate these identified impacts. Potential further avoidance and minimization opportunities and detailed mitigation plans would be incorporated if identified during final design and completion of the permitting process for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.16	<p>NCDWR Permitting Branch comments that in accordance with the Environmental Management Commission's Rules (15A NCAC 2H.0506[h]), mitigation will be required for impacts of greater than 150 linear feet to any single stream. In the event that mitigation is required, the mitigation plan shall be designed to replace appropriate lost functions and values. The North Carolina Division of Mitigation Services may be available to assist with stream mitigation.</p>	<p>Impacts to streams from the Proposed Action would exceed 150 linear feet as disclosed in Chapter 4 Environmental Consequences and Mitigation Measures. The conceptual mitigation plan is to use banking and/or in lieu fee programs offered by NCDEQ Division of Mitigation Services to mitigate these identified impacts. Potential further avoidance and minimization opportunities and detailed mitigation plans would be incorporated if identified during final design and completion of the permitting process for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.17	<p>NCDWR Permitting Branch comments that future documentation, including the 401 Water Quality Certification Application, shall continue to include an itemized listing of the proposed wetland and stream impacts with corresponding mapping.</p>	<p>Comment noted. The 401 Water Quality Certification Application that will be submitted to NCDWR, will include an itemized listing of the proposed wetland and stream impacts with corresponding mapping. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.18	<p>The NCDWR is very concerned with sediment and erosion impacts that could result from this project. The applicant shall address these concerns by describing the potential impacts that may occur to the aquatic environments and any mitigating factors that would reduce the impacts.</p>	<p>As a requirement of the Proposed Action, the Airport Authority must comply with all applicable federal and state laws concerning erosion control. No construction shall occur until the Airport Authority submits a Sediment and Erosion Control (ESC) Plan that is approved by the NCDEQ. The ESC Plan would identify best management practices and erosion control measures to control and contain runoff to reduce the risk of nutrient runoff to these surface waters. The potential impacts to wetlands and surface open waters, including streams, are provided in Chapter 4 Environmental Consequences and Mitigation Measures. These potential impacts are based on the limits of disturbance of the Proposed Action. Final design for the Proposed Action is not yet complete, however, general examples of stormwater control features and the general locations have been added to the EA for greater understanding. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during the permitting process for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.19	<p>NCDWR Permitting Branch comments that an analysis of cumulative and secondary impacts anticipated as a result of this project is required. The type and detail of analysis shall conform to the NC Division of Water Resources Policy on the assessment of secondary and cumulative impacts dated April 10, 2004</p>	<p>An analysis of cumulative impacts was conducted in the EA. See Chapter 4, Section 4.14 Cumulative Impacts. The analysis of cumulative impacts recognizes that while the impacts of individual actions may be small, when combined with the impacts of past, present, and reasonably foreseeable future actions on populations or resources in and around RDU, the impacts could be potentially significant. Past, present, and reasonably foreseeable future actions included projects both on and off-Airport property. The EA concluded that the implementation of the Proposed Action would not result in significant cumulative environmental impacts. Per the NC Division of Water Resources Policy on the assessment of secondary and cumulative impacts dated April 10, 2004, the 401 Water Quality Certification Application will also include an assessment of secondary and cumulative impacts so that NCDWR DWQ may determine that a project "does not result in cumulative impacts, based upon past or reasonably anticipated future impacts, that cause or will cause a violation of downstream water quality standards." No revisions to the Draft EA were necessary to respond to this comment.</p>
9.20	<p>NCDWR Permitting Branch comments that the applicant is respectfully reminded that all impacts, including but not limited to, bridging, fill, excavation and clearing, and rip rap to jurisdictional wetlands, streams, and riparian buffers need to be included in the final impact calculations. These impacts, in addition to any construction impacts, temporary or otherwise, also need to be included as part of the 401 Water Quality Certification Application.</p>	<p>As presented in Chapter 4, Section 4.13 Water Resources, in order to determine the potential impacts, all identified wetlands and streams within the limits of disturbance were considered permanently impacted. The limits of disturbance identify the footprint of the areas that would be disturbed during construction activities. Final design for the Proposed Action is not yet complete. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.21	<p>NCDWR Permitting Branch comments that where streams must be crossed, the NCDWR prefers bridges be used in lieu of culverts. However, we realize that economic considerations often require the use of culverts. Please be advised that culverts should be countersunk to allow unimpeded passage by fish and other aquatic organisms. Moreover, in areas where high quality wetlands or streams are impacted, a bridge may prove preferable. When applicable, the applicant should not install the bridge bents in the creek, to the maximum extent practicable. (If you want specific bridging locations, put in here.)</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during final design and completion of the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.22	<p>Whenever possible, the NCDWR prefers spanning structures. Spanning structures usually do not require work within the stream or grubbing of the streambanks and do not require stream channel realignment. The horizontal and vertical clearances provided by bridges shall allow for human and wildlife passage beneath the structure. Fish passage and navigation by canoeists and boaters shall not be blocked. Bridge supports (bents) should not be placed in the stream when possible.</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during final design and completion of the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.23	<p>NCDWR Permitting Branch comments that bridge deck drains shall not discharge directly into the stream. Stormwater shall be directed across the bridge and pre-treated through site-appropriate means (grassed swales, pre-formed scour holes, vegetated buffers, etc.) before entering the stream. Please refer to the most recent version of the North Carolina Department of Transportation Stormwater Best Management Practices Toolbox manual for approved measures.</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during final design and completion of the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.24	<p>NCDWR Permitting Branch comments that sediment and erosion control measures should not be placed in wetlands or streams.</p>	<p>Comment noted. Additional text was added to Chapter 4 Section 4.13.4 Water Resources, Mitigation, Avoidance, and Minimization Measures to state that erosion control measures will not be placed in wetlands or streams. This will become a special condition of any FAA authorization.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.25	<p>NCDWR Permitting Branch comments that borrow/waste areas should avoid wetlands to the maximum extent practical. Impacts to wetlands in borrow/waste areas will need to be presented in the 401 Water Quality Certification and could precipitate compensatory mitigation.</p>	<p>The analysis of potential impacts to wetlands and streams presented in Chapter 4, Section 4.13 Water Resources includes potential impacts from the borrow sites. The Airport Authority has identified potential borrow sites to obtain the fill material on existing Airport property. In order to get the fill material, the proposed borrow sites would be cleared, impacting wetlands and streams. In addition to the borrow site areas, there would also be potential impacts to accommodate the proposed relocated runway, runway safety areas, the perimeter roadway, utility relocations, stormwater drainage facilities, and Lumley Road relocation and the installation of approach lighting systems for the new runway and removal of the approach lighting systems for the existing runway. The potential impacts to wetlands and surface open waters, including streams, are provided in Chapter 4 Section 4.13 Water Resources. These potential impacts are based on the limits of disturbance of the Proposed Action. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during final design and completion of the permitting process for the Proposed Action and submitted to NCDWR in the 401 Water Quality Certification Application. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.26	<p>NCDWR Permitting Branch comments that the 401 Water Quality Certification application will need to specifically address the proposed methods for stormwater management. More specifically, stormwater shall not be permitted to discharge directly into streams or surface waters</p>	<p>Comment noted. A graphic and additional text was added to the Final EA in Chapter 1 Purpose and Need to identify the potential location of the modifications/additions to the stormwater retention areas. Additional text was also added to Chapter 4 Section 4.13 Water Resources to identify erosion and sediment control measures as well as to show general locations and designs of stormwater facilities. Final design for the Proposed Action is not yet complete. Additional, more detailed methods for stormwater management, would be submitted to NCDWR in the 401 Water Quality Certification Application.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.27	<p>NCDWR Permitting Branch comments that based on the information presented in the document, the magnitude of impacts to wetlands and streams may require an Individual Permit application to the Corps of Engineers and corresponding 401 Water Quality Certification. Please be advised that a 401 Water Quality Certification requires satisfactory protection of water quality to ensure that water quality standards are met and no wetland or stream uses are lost. Final permit authorization will require the submittal of a formal application by the permittee and written concurrence from the NCDWR. Please be aware that any approval will be contingent on appropriate avoidance and minimization of wetland and stream impacts to the maximum extent practical, the development of an acceptable stormwater management plan, and the inclusion of appropriate mitigation plans where appropriate.</p>	<p>Comment noted. It will be the Airport Authority’s responsibility to apply for and obtain permits required by the USACE and the State for the Proposed Action including the 404 and 401 permits respectively.</p> <ol style="list-style-type: none"> <li>1. No construction shall occur in a jurisdictional water until the Airport Authority obtains the necessary Section 404 and Section 401 of the Clean Water Act permits/approvals from the USACE and NCDWR respectively.</li> <li>2. No construction shall occur in a non-jurisdictional wetland until mitigation for that impact has been completed as set in the EA and Record of Decision. Proof of pre-construction mitigation must be submitted to the FAA – Airports District Office prior to impacting said wetland.</li> <li>3. No construction shall occur until the Airport Authority submits a Sediment and Erosion Control Plan that is approved by the NCDEQ.</li> </ol> <p>No revisions to the Draft EA were necessary to respond to this comment.</p>
9.28	<p>NCDWR Permitting Branch comments that if concrete is used during construction, a dry work area shall be maintained to prevent direct contact between curing concrete and stream water. Water that inadvertently contacts uncured concrete shall not be discharged to surface waters due to the potential for elevated pH and possible aquatic life and fish kills. Concrete shall be handled in accordance with the NPDES Construction General Permit NCG010000.</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. Additional text was added to Chapter 4 Section 4.13.4 Water Resources, Mitigation, Avoidance, and Minimization Measures to state that concrete will be handled in accordance with the NPDES Construction General Permit NCG010000.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.29	<p>NCDWR Permitting Branch comments that if temporary access roads or detours are constructed, the site shall be graded to its preconstruction contours and elevations. Disturbed areas shall be seeded or mulched to stabilize the soil and appropriate native woody species shall be planted. When using temporary structures, the area shall be cleared but not grubbed. Clearing the area with chain saws, mowers, bush-hogs, or other mechanized equipment and leaving the stumps and root mat intact allows the area to re-vegetate naturally and minimizes soil disturbance.</p>	<p>As described in Chapter 4 Section 4.13 Water Resources all of the impacts to wetlands and surface open waters including streams would be permanent. The Airport Authority would comply with all applicable federal and state laws concerning erosion control. An Erosion and Sedimentation Control (ESC) Plan would be developed and approved by the NCDEQ prior to construction. Best management practices and erosion control measures will be identified to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact. The Airport Authority would obtain approval of the ESC Plan from the NCDEQ.</p> <p>Permanently disturbed areas will be seeded or mulched to stabilize the soil and appropriate ground cover with native species approved by NCDEQ will be planted. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.30	<p>NCDWR Permitting Branch comments that unless otherwise authorized, placement of culverts and other structures in waters and streams shall be placed below the elevation of the streambed by one foot for all culverts with a diameter greater than 48 inches, and 20 percent of the culvert diameter for culverts having a diameter less than 48 inches, to allow low flow passage of water and aquatic life. Design and placement of culverts and other structures including temporary erosion control measures shall not be conducted in a manner that may result in dis-equilibrium of wetlands or streambeds or banks, adjacent to or upstream and downstream of the above structures. The applicant is required to provide evidence that the equilibrium is being maintained if requested in writing by the NCDWR. If this condition is unable to be met due to bedrock or other limiting features encountered during construction, please contact the NCDWR for guidance on how to proceed and to determine whether or not a permit modification will be required.</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. The potential impacts to wetlands and surface open waters, including streams, are provided in Chapter 4 Section 4.13 Water Resources. These potential impacts are based on the limits of disturbance of the Proposed Action. Potential further avoidance and minimization opportunities and detailed mitigation plans as well as any culvert crossings and design details would be identified during final design and completion of the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.31	<p>NCDWR Permitting Branch comments that if multiple pipes or barrels are required, they shall be designed to mimic natural stream cross section as closely as possible including pipes or barrels at flood plain elevation, floodplain benches, and/or sills may be required where appropriate. Widening the stream channel should be avoided. Stream channel widening at the inlet or outlet end of structures typically decreases water velocity causing sediment deposition that requires increased maintenance and disrupts aquatic life passage</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. Potential further avoidance and minimization opportunities including stream crossings details and detailed mitigation plans would be identified during final design and completion of the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.32	<p>NCDWR Permitting Branch comments that if foundation test borings are necessary; it shall be noted in the document. Geotechnical work is approved under General 401 Certification Number 3883/Nationwide Permit No. 6 for Survey Activities.</p>	<p>Additional text was added to Chapter 1 Purpose and Need of the Final EA to note that geotechnical test borings have been conducted at the proposed borrow site locations to determine if the area has the quality and quantity of material to be used for the Proposed Action. The geotechnical test boring data confirmed that the Proposed Action's borrow sites are suitable for fill.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.33	<p>NCDWR Permitting Branch comments that sediment and erosion control measures sufficient to protect water resources must be implemented and maintained in accordance with the most recent version of North Carolina Sediment and Erosion Control Planning and Design Manual and the most recent version of NCS000250.</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. Additional text was added to Chapter 4 Section 4.13.4 Water Resources, Mitigation, Avoidance, and Minimization Measures to state that sediment and erosion control measures sufficient to protect water resources must be implemented and maintained in accordance with the most recent version of North Carolina Sediment and Erosion Control Planning and Design Manual and the most recent version of NCS000250.</p>
9.34	<p>NCDWR Permitting Branch comments that all work in or adjacent to stream waters shall be conducted in a dry work area. Approved BMP measures from the most current version of the NCDOT Construction and Maintenance Activities manual such as sandbags, rock berms, cofferdams and other diversion structures shall be used to prevent excavation in flowing water.</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. Additional text was added to Chapter 4 Section 4.13.4 Water Resources, Mitigation, Avoidance, and Minimization Measures to state that approved BMP measures from the most current version of the NCDOT Construction and Maintenance Activities manual such as sandbags, rock berms, cofferdams and other diversion structures shall be used to prevent excavation in flowing water.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.35	<p>NCDWR Permitting Branch comments that while the use of National Wetland Inventory (NWI) maps, NC Coastal Region Evaluation of Wetland Significance (NC-CREWS) maps and soil survey maps are useful tools, their inherent inaccuracies require that qualified personnel perform onsite wetland delineations prior to permit approval</p>	<p>As described in Chapter 3 Section 3.13 Water Resources, pedestrian field surveys were conducted by qualified personnel between July and October 2021 and again in August 2022 to verify the presence or absence of potential wetlands, streams, or other surface water features in the Detailed Study Area. Water resources identified within a 1,218-acre subset of the DSA (referred to as the Jurisdictional Determination [JD] Review Area) were reviewed by the USACE on August 25 and 26, 2022. The JD Review area was identified because not all areas of the DSA would be potentially impacted. The USACE issued a hybrid Preliminary Jurisdictional Determination (PJD)/Approved Jurisdictional Determination (AJD) for the JD Review Area on November 22, 2022 (Action ID No. SAW-2022-01559). The remaining portions of the DSA outside of the JD Review Area have not been verified by regulatory agencies. If required in the future, it is anticipated that these areas would also be covered under a similar hybrid PJD/AJD. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.36	<p>NCDWR Permitting Branch comments that heavy equipment should be operated from the bank rather than in stream channels in order to minimize sedimentation and reduce the likelihood of introducing other pollutants into streams. This equipment shall be inspected daily and maintained to prevent contamination of surface waters from leaking fuels, lubricants, hydraulic fluids, or other toxic materials.</p>	<p>Comment noted. The potential impacts to wetlands and surface open waters, including streams, are provided in Chapter 4 Environmental Consequences and Mitigation Measures. These potential impacts are based on the limits of disturbance of the Proposed Action. All wetlands and surface open waters, including streams, within the limits of disturbance were considered impacted. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval.</p> <p>As provided in Chapter 4 Section 4.6 Hazardous Materials, Solid Waste, and Pollution Prevention, construction contractors would be required to train their employees in spill prevention and control measures and provide the necessary response materials. Equipment containing oil will be inspected regularly and prior to beginning work every day. Spill response materials will be kept on hand and stocked at all times. In the event of a spill, the contractors will assess the area for safety and notify the relevant parties.</p> <p>Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during final design and completion of the permitting process for the Proposed Action and submitted to NCDWR in the 401 Water Quality Certification Application.</p> <p>No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.37	<p>NCDWR Permitting Branch comments that riprap shall not be placed in the active thalweg channel or placed in the streambed in a manner that precludes aquatic life passage. Bioengineering boulders or structures should be properly designed, sized and installed.</p>	<p>Comment noted. Final design for the Proposed Action is not yet complete. NCDWR Permitting Branch comments will be considered in the final design. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during final design and completion of the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.38	<p>NCDWR Permitting Branch comments that riparian vegetation (native trees and shrubs) shall be preserved to the maximum extent possible. Riparian vegetation must be reestablished within the construction limits of the project by the end of the growing season following completion of construction.</p>	<p>Comment noted. The Airport Authority would comply with all applicable federal and state laws concerning erosion control. An Erosion and Sedimentation Control (ESC) Plan would be developed and approved by the NCDEQ prior to construction. Best management practices and erosion control measures will be identified to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact. The Airport Authority would obtain approval of the ESC Plan from the NCDEQ.</p> <p>Permanently disturbed areas will be seeded or mulched to stabilize the soil and appropriate ground cover with native species approved by NCDEQ will be planted. Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during the permitting process for the Proposed Action and would be submitted as part of the 401 Water Quality Certification Application for NCDWR approval.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.39	I also am concerned by cutting the trees and changing the roads that the runoff goes into Briar Creek and Little Briar Creek.	<p>The Proposed Action includes the relocation of the existing Airport Perimeter Road and a portion of the existing Lumley Road. The stormwater from these existing roadways either drains to the Brier Creek Reservoir or into Sycamore Creek and subsequently into Lake Crabtree through a storm drainage system consisting of storm sewers, culverts, detention ponds, and open ditches. Final design for the Proposed Action is not yet complete. However, after relocation the stormwater runoff would be replaced similar to how it operates today.</p> <p>During construction and the clearing of trees, the Airport Authority would comply with all applicable federal and state laws concerning erosion control. An Erosion and Sedimentation Control (ESC) Plan would be developed and approved by the NCDEQ prior to construction. Best management practices and erosion control measures will be identified to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact. The Airport Authority would obtain approval of the ESC Plan from the NCDEQ.</p>
9.40	I am concerned that they're also building more concrete areas where there's more runoff.	<p>Comment noted. The Proposed Action would increase the concrete and asphalt areas (impervious surfaces) at the Airport. An element of the Proposed Action provides additional drainage infrastructure for additional impervious pavement areas associated with the relocated runway. Existing stormwater drainage pipes would be replaced/rehabilitated under the existing runway and connected to new infrastructure for the relocated runway. Existing stormwater retention areas would be modified and or increased and new stormwater retention areas added as needed to maintain storage and accommodate increases in peak stormwater runoff. A graphic and additional text was added to the Final EA in Chapter 1 Purpose and Need to identify the potential location of the modifications/additions to the stormwater retention areas.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.41	Don't understand why the creek over by Haleys Branch is polluted and why it's not functioning right now, and I've asked about that, and I was told it needed to be fixed. That's been over three months. How long does it take to fix?	The Proposed Action does not directly or indirectly impact Haley's Branch creek. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.42	The Brier Creek reservoir is affected by this current project.	<p>Comment noted. As stated in Chapter 1 Purpose and Need, the Airport Authority plans to use water from Brier Creek Reservoir due to its proximity to the construction site. The water would be removed from Brier Creek Reservoir and applied to the fill material over a period of approximately two years to compact the soil. This process would also allow for Brier Creek Reservoir to be naturally recharged as the water infiltrates down to the groundwater. In addition, a peninsula will be constructed in the Reservoir to place the approach lighting for the new runway. Any addition of fill to accommodate the relocated runway navigational lights would need to be coordinated with Wake County. Mitigation could be by removing the existing island/fill for the existing navigation lights. However, this may cause additional disturbance of potentially contaminated sediment. Coordination is ongoing with USEPA and Wake County concerning the appropriate mitigation. These actions would have minor impacts to Brier Creek Reservoir and would not eliminate the use of the Brier Creek Reservoir. In addition, erosion control structures and best management practices would be implemented to prevent erosion and sedimentation into the reservoir. The potential impacts to Briar Creek Reservoir are provided in Chapter 4 Section 4.13 Water Resources. FAA has described the special conditions that are required by the FAA to mitigate or minimize any potential impacts within the EA. See Chapter 4 Environmental Consequences and Mitigation Measures. With the implementation of the special conditions and mitigation measures, no exceedances of environmental thresholds of significance were identified. The Final EA was revised to show the general design and location of the stormwater facilities and BMPs that will be implemented were identified (See Section Chapter 1 Section 1.3 Description of the Proposed Project and Chapter 4 Section 4.13 Water Resources). Potential further avoidance and minimization opportunities and detailed mitigation plans would be identified during final design and completion of the permitting process for the Proposed Action and submitted to NCDWR in the 401 Water Quality Certification Application.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.43	<p>All of the water drainage areas and the managed property in the airport drain directly to William B Umstead State Park or indirectly to Briar Creek and Crabtree Lake into William B Umstead State Park, and so therefore all of the drainage areas and quantity and quality should be part of the assessment of the effect.</p>	<p>Resources including surface water (wetlands, streams, lakes etc.), groundwater, and floodplains, do not function as separate and isolated components of the watershed, but rather as a single, integrated natural system. Chapter 4, Section 4.13 Water Resources presents the analysis of potential impacts to water resources as a result of the Future No Action Alternative and the Proposed Action. The existing conditions for water resources are discussed in Chapter 3, Section 3.13 Water Resources. Impacts to water resources are expected to include wetlands, streams, and other surface waters. The Proposed Action would require mitigation measures as described in Chapter 4, Section 4.13 Water Resources. With the mitigation measures, the Proposed Action would not result in impacts to William B Umstead Park. General details of stormwater structures and their locations have been added to the document. In addition, best management practices would be implemented to prevent erosion and sedimentation into the reservoir. These elements can be found in Chapter 4, Section 4.13 Water Resources. This project does not affect any drainage area that flows directly from the airport into the park.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.44	Crabtree Creek and William B Umstead State Park are water resources most impacted, and their downstream protection should be the priority for these millions.	<p>Because there are potential and unavoidable impacts to wetlands and surface open waters including streams, mitigation will be required for the Proposed Action to avoid significant impacts. The conceptual mitigation plan is to use stream and wetland banking and/or in lieu fee programs offered by NCDEQ Division of Mitigation Services to mitigate these identified impacts. Mitigation must comply with 33 CFR Part 332 and 40 CFR Part 230. Additional text was added to Chapter 4 Section 4.13 Water Resources to clarify and expand on the conceptual mitigation.</p> <p>The Proposed Action will be required to adhere to the rules, regulations and design standards set forth in the North Carolina Erosion and Sediment Control Planning and Design Manual. Installation of erosion control measures would be installed at the borrow site areas, along the relocation areas of Lumley Road, and between the existing perimeter service road and the existing runway prior to and during construction activities. It is anticipated that various erosion control measures will be utilized for the Proposed Action including, seeding, silt fences, diversion ditches, check dams, sediment traps, sediment basins, inlet protection, and riprap outlet protection. Additional information on these measures is provided in Chapter 4, Section 4.13 Water Resources. Final design for the Proposed Action is not yet complete. The location of these measures will be identified after design is complete and through the States' permitting process.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.45	Storm water runoff already overloads the beautiful creek beds adjacent to the airport and I have personally witnessed the erosion that occurs following heavy rains. With further development of the airport, it is appropriate to budget for mitigation of impacts to the undeveloped adjacent lands.	The Proposed Action would increase the impervious surface at the Airport. An element of the Proposed Action provides additional drainage infrastructure for additional impervious pavement areas associated with the relocated runway. Existing stormwater drainage pipes would be replaced/rehabilitated under the existing runway and connected to new infrastructure for the relocated runway. Existing stormwater retention areas would be modified and or increased and new stormwater retention areas added as needed to maintain storage and accommodate increases in peak stormwater runoff. A graphic and additional text was added to the Final EA in Chapter 1 Purpose and Need to identify the potential location of the modifications/additions to the stormwater retention areas. Additional details were added to Chapter 4 Section 4.13 Water Resources discussing the erosion and sediment control measures. With the mitigation measures, the Proposed Action would not result in significant impacts to wetlands, streams, and surface open waters.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.46	All water that drains from the area of the proposed new runway ultimately drains into Lake Crabtree and into Umstead State Park. So, what is done on the far side of the Airport from the Park does affect the Park.	<p>Resources including surface water (wetlands, streams, lakes etc.), groundwater, and floodplains, do not function as separate and isolated components of the watershed, but rather as a single, integrated natural system. Chapter 4, Section 4.13 Water Resources presents the analysis of potential impacts to water resources as a result of the Future No Action Alternative and the Proposed Action. Because there are potential and unavoidable impacts to wetlands and surface open waters including streams, mitigation will be required for the Proposed Action to avoid significant impacts. The conceptual mitigation plan is to use stream and wetland banking and/or in lieu fee programs offered by NCDEQ Division of Mitigation Services to mitigate these identified impacts. Mitigation must comply with 33 CFR Part 332 and 40 CFR Part 230. Additional text was added to Chapter 4 Section 4.13 Water Resources to clarify and expand on the conceptual mitigation.</p> <p>The Proposed Action will be required to adhere to the rules, regulations and design standards set forth in the North Carolina Erosion and Sediment Control Planning and Design Manual. Installation of erosion control measures would be installed at the borrow site areas, along the relocation areas of Lumley Road, and between the existing perimeter service road and the existing runway prior to and during construction activities. It is anticipated that various erosion control measures will be utilized for the Proposed Action including, seeding, silt fences, diversion ditches, check dams, sediment traps, sediment basins, inlet protection, and riprap outlet protection. Additional information on these measures is provided in Chapter 4, Section 4.13 Water Resources. Final design for the Proposed Action is not yet complete. The location of these measures will be identified after design is complete and through the States' permitting process.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.47	<p>Please also be reminded that Lake Crabtree, Brier Creek Reservoir, Brier Creek, Haley’s Branch Creek, and Crabtree Creek are part of the taxpayer funded Crabtree Creek Watershed Flood Control program that started in the 1950’s. The dams to create these lakes were planned before the Airport started their expansion efforts. A secondary goal of the flood control program was to provide recreation at the flood control structures as a way to give the public more benefit for their tax dollars. The public has no access to Brier Creek Reservoir, so we must be allowed to keep access to Lake Crabtree County Park (LCCP) in full as we know it today (including the land).</p>	<p>There is no construction on or near Lake Crabtree County Park. Access to this park will not be affected. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.48	<p>There will be thousands of feet of streams and wetlands impacted. Basically, the streams and wetlands in that area will be covered up, diverted, or otherwise destroyed.</p>	<p>The analysis of impacts to wetlands and streams presented in Chapter 4, Section 4.13 Water Resources includes impacts from borrow sites as well as fill sites. The Airport Authority has identified potential borrow sites to obtain the fill material on existing Airport property. In order to get the fill material, the proposed borrow sites would be cleared, impacting wetlands and streams. The exact amount, however, remains to be seen as final design will continue to incorporate minimizing actions to reduce these impacts. In addition to the borrow site areas, there would also be impacts to accommodate the proposed relocated runway, runway safety areas, the perimeter roadway, utility relocations, stormwater drainage facilities, and Lumley Road relocation and the installation of approach lighting systems for the new runway and removal of the approach lighting systems for the existing runway. With the proposed mitigation measures, impacts to waters would be compensated for and the functions that these waters provide would be provided both on site and off site. Additional information has been provided in Chapter 4 Section 4.13 Water Resources to include general information on stormwater design and location and for erosion and sediment control BMPs. As a result, the Proposed Action would not result in significant impacts to wetlands, streams, and surface open waters.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.49	<p>There will be thousands of feet of streams and wetlands impacted that will require millions of dollars in mitigation funds. RDUAA will be required to mitigate the approximate 1.56 acres jurisdictional wetlands, 2.53 acres wetlands protected under Executive Order 11990, 8,780 linear feet of streams, and 22.6 acres of riparian buffer area that are likely to be permanently impacted by the new runway (Tables 4-19 through 4-21). The mitigation fund value is likely to be \$10 to \$15 million.</p>	<p>The Proposed Action would result in unavoidable impacts to wetlands and surface open waters including streams. Because there are potential and unavoidable impacts to wetlands and surface open waters including streams, mitigation will be required for the Proposed Action to avoid significant impacts. The conceptual mitigation plan is to use stream and wetland banking and/or in lieu fee programs offered by NCDEQ Division of Mitigation Services to mitigate these identified impacts. The FAA allows stream and wetland banking as a mitigation tool for projects that must occur in streams and wetlands. Mitigation must comply with 33 CFR Part 332 and 40 CFR Part 230. According to the USEPA and USACE’s Final Compensatory Mitigation Rule, the environmentally preferable compensatory mitigation would be provided first through mitigation banks then in-lieu fee programs because they usually involve consolidating compensatory mitigation projects where ecologically appropriate, consolidating resources, providing financial planning and scientific expertise (which often is not practical for permittee-responsible compensatory mitigation projects), reducing temporal losses of functions, and reducing uncertainty over project success. In addition, according to the Final Compensatory Rule, “compensatory mitigation projects should not be located where they will increase risks to aviation by attracting wildlife to areas where aircraft-wildlife strikes may occur (e.g., near airports)” Additional text was added to Chapter 4 Section 4.13 Water Resources to clarify and expand on the conceptual mitigation.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.50	Streams and wetland impacted by the new runway drain into Brier Creek, Crabtree Creek and then into William B. Umstead State Park.	<p>Comment noted. As discussed in Chapter 4 Section 4.13 Water Resources, an analysis of the Proposed Action’s potential to affect groundwater through the removal of water from Brier Creek Reservoir, the increase in impervious surfaces, pollutant exposure and spills, and by the removal of waterways (ponds, streams, wetlands) that would allow for ground water recharge was conducted for the EA. The Proposed Action would have unavoidable impacts by removing wetlands and surface open waters including streams. However, after the fill material is excavated, the area would be graded and planted with appropriate ground cover vegetation approved by NCDEQ to prevent erosion. The overall flow of water would still be directed downward toward Brier Creek Reservoir with appropriate erosion control measures included so that the Proposed Action would not result in significant impacts to surface water hydrology. In addition, while there are changes to the groundwater system because of the impacts to the flow of water on site and from water consumption for project construction, these changes include methods to ensure the impacts to the ground water system are minor. There would be no significant impacts to groundwater from construction or operation of the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>
9.51	The Neuse River Basin Riparian Buffer Protection Program, aka Neuse Buffer Rules (15A NCAC 02b.0714, amended June 15, 2020) protects a 50-foot buffer along streams within the Neuse River Basin. All the streams within the RDU Airport and William B. Umstead State Park are protected under the Neuse Buffer Rules.	<p>Riparian buffers of streams protected under the State’s Neuse River Riparian Buffer Rules would be preserved to the greatest extent practicable. Stormwater runoff into the riparian buffer shall meet dispersed flow as defined in North Carolina rule 15A NCAC 02H.1002. For unavoidable impacts to buffers, a buffer impact plan will be submitted to the State for authorization under the State’s Neuse River Riparian Buffer Rules. Final design for the Proposed Action is not yet complete. Potential further avoidance and minimization opportunities would be identified during final design and completion of the permitting process for the Proposed Action. No construction may occur in the buffer areas until approved by NCDEQ. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.52	<p>All means to avoid impacts should be taken including the use of off-site fill sources. In addition, RDU can establish a proprietary bank of its own to protect critical areas on RDU managed land such as expanded buffers to Little Brier Creek and Lake Crabtree County Park, buffers to other water resources and buffers to William B Umstead Park.</p>	<p>The Airport Authority and the FAA have shown in their alternatives analysis that there were no practicable alternatives that would meet the purpose and need which would avoid all adverse impacts to wetlands and surface open waters including streams. See Chapter 2 Alternatives for the discussion of alternatives. As described in Chapter 4 Section 4.13 Water Resources, because there are potential and unavoidable impacts to wetlands and surface open waters including streams, mitigation will be required for the Proposed Action to avoid significant impacts. The conceptual mitigation plan is to use stream and wetland banking and/or in lieu fee programs offered by NCDEQ Division of Mitigation Services and on-site BMP and stormwater control features to mitigate these identified impacts. This includes seeding and mulching disturbed areas with native species ground cover approved by NCDEQ for erosion control. The FAA allows stream and wetland banking as a mitigation tool for projects that must occur in streams and wetlands. As provided in FAA Advisory Circular, 150/5200-33C <i>Hazardous Wildlife Attractants on or near Airports</i>, wetland mitigation must be designed so it does not create a wildlife hazard. The FAA recommends a separation distance from wetland mitigation projects that may attract hazardous wildlife of 10,000 feet for airports serving turbine-powered aircraft up to a distance of 5 miles to protect approach and departure airspace. Wetland banking and in lieu fee programs benefit airport projects, as wetland impacts mitigated outside of these separations can still be located within the same watershed. Mitigation must comply with 33 CFR Part 332 and 40 CFR Part 230.</p>
9.53	<p>The forested areas of 286 and Odd Fellows are needed to provide critical water filtration and noise and light buffer to Umstead State Park.</p>	<p>The Proposed Action would remove up to 480 acres of forested area on Airport property. The area of potential tree clearing is shown in Chapter 4, Section 4.3 Biological Resources and is within the Detailed Study Area. The forested areas of 286 and Odd Fellows which are south and east of National Guard Drive and borders William B. Umstead State Park are not within this area and would not be affected by the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
9.54	Two significant structures from the Crabtree Creek Watershed Project are affected by the RDU Airport – structure #20 that created the Brier Creek Reservoir and structure #23 that created Lake Crabtree.	The potential impacts to structure #20 (Brier Creek Reservoir) and structure #23 (Lake Crabtree) due to the Proposed Action are provided in Chapter 4 Environmental Consequences and Mitigation Measures. The Proposed Action does not result in any impacts to any dams. The FAA has described the special conditions that are required by the FAA to mitigate or minimize any potential impacts within the EA to water resources. See Chapter 4, Section 4.13 Water Resources. With the implementation of the special conditions and mitigation measures, no environmental thresholds of significance were exceeded. No revisions to the Draft EA were necessary to respond to this comment.
9.55	RDUAA's plans for the new runway totally eliminate any chance of using the Brier Creek Reservoir for recreation. In addition, given the plans to use that area for borrow dirt for the new runway, the chances of that area benefiting the public in any manner is eliminated.	As stated in Chapter 1 Purpose and Need, the Airport Authority plans to use water from Brier Creek Reservoir due to its proximity to the construction site. The water would be removed from Brier Creek Reservoir and applied to the fill material over a period of approximately two years to compact the soil. This process would also allow for Brier Creek Reservoir to be naturally recharged with the same water as it infiltrates back into the groundwater. The relocation of the runway would move air traffic from the existing runway to the new runway. The air traffic would still cross the reservoir but in a different location. There would be no taking of the Brier Creek Reservoir and the Proposed Action would not eliminate the use of the Brier Creek Reservoir for recreational purposes.  The proposed borrow areas are on Airport property. The Airport Authority is legislatively vested with the power and mandate to control, lease, maintain, improve, operate, and regulate RDU, with complete authority over the Airport. After the fill material is excavated, the area would be graded and planted with appropriate ground cover vegetation approved by NCDEQ to prevent erosion. This would not preclude this area from any future use deemed appropriate by the Airport Authority.
<b>10</b>	<b>HAZARDOUS MATERIALS AND SOLID WASTE</b>	

COMMENT #	SUMMARY OF COMMENT	RESPONSE
10.1	I am very concerned that my well would be polluted with the runoff from the superfund site.	<p>As a requirement of the Proposed Action, the Airport Authority must comply with all applicable federal and state laws concerning erosion control. An Erosion and Sediment Control Plan, approved by the NCDEQ, would be developed prior to construction. The ESC Plan would identify best management practices and erosion control measures to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact.</p> <p>In addition, to further prevent the potential spread of environmental contamination during construction activities at the NPL Site, a Materials Management Plan (MMP) would be required. The MMP would include procedures for construction worker health and safety, cuts and excavation, erosion and sediment control, soil management, fill and reconstruction, site security, traffic control, contact water, dust mitigation, and equipment decontamination. Per the restrictive covenants filed with the Wake County Register of Deeds, the MMP must be approved by the USEPA prior to beginning work onsite. A condition requiring USEPA written approval of the final Lumley Road relocation plan and the MMP prior to construction in the superfund site will be part of the FAA Authorization. This condition is located in Chapter 4, Section 4.6.4 Hazardous Materials, Solid Waste, and Pollution Prevention, Mitigation, Avoidance, and Minimization Measures.</p>
10.2	The NCDEQ Division of Waste Management Solid Waste Section comments that because of recent developments surrounding the potential of PFAS contamination at airports and other facilities where the use of fire suppression foam may have occurred, areas where there were airport responses to fires or spills should be evaluated separately from areas with no suspected contaminants.	Comment noted. There were no areas within the Detailed Study Area where the use of fire suppression foam are known to have occurred which would require separate evaluation. No revisions to the Draft EA were necessary to respond to this comment.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
10.3	The NCDEQ Division of Waste Management Solid Waste Section comments that any materials generated by the excavation of soil, demolition of concrete, asphalt, and other potentially contaminated media must be managed and disposed of appropriately and in accordance with current North Carolina regulations.	Comment noted. As a requirement of the Proposed Action, the Airport Authority must comply with all applicable federal and state laws concerning any materials generated by the excavation of soil, demolition of concrete, asphalt, and other potentially contaminated media. This condition is located in Chapter 4, Section 4.6.4 Hazardous Materials, Solid Waste, and Pollution Prevention, Mitigation, Avoidance, and Minimization Measures.
10.4	The NCDEQ Division of Waste Management Solid Waste Section comments that based on the information provided in this document, they do not see an adverse impact on the surrounding communities and likewise knows of no situations in the communities, which would affect this project.	Comment noted. No revisions to the Draft EA were necessary to respond to this comment.
10.5	The NCDEQ Division of Waste Management Solid Waste Section comments that for any planned or proposed projects, it is recommended that during any land clearing, demolition, and construction, the Raleigh-Durham Airport Authority and/or its contractors would make every feasible effort to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials in the development of this project where suitable.	As stated in Chapter 4, Section 4.6 Hazardous Materials, Solid Waste, and Pollution Prevention, the Airport Authority is strongly committed to sustainability practices and would seek to recycle as much material as practicable. Material that is not suitable for recycling would be disposed of using existing disposal measures, including sending solid and semi-solid waste to a permitted landfill or stockpiled on Airport property. No revisions to the Draft EA were necessary to respond to this comment.
10.6	The NCDEQ Division of Waste Management Solid Waste Section comments that any waste generated by and of the project that cannot be beneficially reused or recycled, may require disposal of at a solid waste management facility permitted by the Division. The Section strongly recommends that the Raleigh-Durham Airport Authority require all contractors to provide proof of proper disposal for all generated waste to permitted facilities.	Comment noted. Text was added to Chapter 4, Section 4.6.4 Hazardous Materials, Solid Waste, and Pollution Prevention, Mitigation, Avoidance, and Minimization Measures as part of the minimization measures to include that the Airport Authority would require, when applicable, all contractors as part of the Proposed Action to provide proof of proper disposal for all generated waste to permitted facilities.

COMMENT #	SUMMARY OF COMMENT	RESPONSE
10.7	<p>The NCDEQ Division of Waste Management Hazardous Waste Section comments that any hazardous waste generated from the demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed project must be managed in accordance with the North Carolina Hazardous Waste Rules. The demolition, construction, operation, maintenance, and remediation activities conducted will most likely generate solid waste, and a determination must be made whether it is a hazardous waste. If a project site generates more than 220 pounds of hazardous waste in a calendar month, the HWS must be notified, and the site must comply with the small quantity generator (SQG) requirements. If a project site generates more than 2200 pounds of hazardous waste in a calendar month, the HWS must be notified, and the facility must comply with the large quantity generator (LQG) requirements.</p>	<p>The Airport Authority is a designated RCRA hazardous waste generator (ID NCD986232692). RDU is listed as a Very Small Quantity Generator (VSQG). Regulations through NCDEQ state that a project site that will generate more than 220 pounds of hazardous waste in a month must notify the HWS and will be required to comply with the LQG requirements. Per 40 CFR 761.1(d), PCBs are regulated by the Toxic Substances Control Act (TSCA) rather than RCRA. As stated in Chapter 4, Section 4.6 Hazardous Materials, Solid Waste, and Pollution Prevention, all activities that involve disturbing or excavating soils will be performed in accordance with applicable federal, state, and local regulations. Communication with the North Carolina Department of Environmental Quality (NCDEQ) confirmed that PCB-contaminated materials would not be regulated through RCRA and would not result in an increase in hazardous materials. The material generated onsite will be characterized before determination of disposal location is made. Per TSCA regulations, PCB-contaminated materials will be disposed of through an approved PCB-disposal site. Clean Harbors Reidsville, LLC was identified in Table 3-7B of Chapter 3 as a PCB-permitted storage and disposal site. No revisions to the Draft EA were necessary to respond to this comment.</p>
10.8	<p>The NCDEQ Division of Waste Management Hazardous Waste Section comments that generators are required to determine their generator status and both SQGs &amp; LQGs are required to obtain a site EPA Identification number for the generation of hazardous waste.</p>	<p>Comment noted. The Airport Authority is a designated RCRA hazardous waste generator (ID NCD986232692). As stated in Chapter 4, Section 4.6 Hazardous Materials, Solid Waste, and Pollution Prevention, all activities that involve disturbing or excavating soils will be performed in accordance with applicable federal, state, and local regulations. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
10.9	<p>The NCDEQ Division of Waste Management Superfund Section comments that two (2) Superfund Section sites and one (1) Brownfields Program Sites were identified within one mile of the project as shown on the attached report. The Superfund Section recommends that site files be reviewed to ensure that appropriate precautions are incorporated into any construction activities that encounter potentially contaminated soil or groundwater.</p>	<p>The NCDEQ site files were reviewed as part of the EA. The Ward Transformer site is a Superfund and Brownfields Site and was identified in Chapter 3 Section 3.6 Hazardous Materials, Solid Waste, and Pollution Prevention. The other Superfund Site is Northern Telecom (Inactive), which is located outside of the Detailed Study Area and will not be affected by the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>
10.10	<p>The EPA recommends continued communication and coordination of planned and ongoing activities between the EPA, FAA, the North Carolina Department of Environmental Quality (NCDEQ), RDU, contractors, and the public. The EPA recommends the use of secondary containment for storage and handling of Petroleum, Oils, and Lubricants (POL) to protect surface waters of Wake County and as required by the Clean Water Act. Where secondary containment is not directly practicable, spill ponds and oil water separators should be constructed downstream of POL related activities. Construction and operations in support of the Proposed Action should ensure that Resource Conservation and Recovery Act-regulated solid wastes generated are disposed of in accordance with federal regulations.</p>	<p>The Airport Authority will, when required, continue coordination with the USEPA, NCDEQ, the public, and construction contractors beyond the EA process into the permitting process and into construction.</p> <p>The Proposed Action does not include any Petroleum, Oils, and Lubricants (POL) storage facilities or oil water separators. Chapter 4 Section 4.6 Hazardous Materials, Solid Waste, and Pollution Prevention details that training of employees on spill prevention, control, and countermeasure should be conducted regardless of the amount of material stored onsite. In addition, RDU's Stormwater Pollution Prevention Plan (SWPPP) will be updated as necessary for the Proposed Action to reflect measures necessary to protect surface waters per NPDES compliance requirements.</p> <p>RCRA-regulated solid waste will be characterized and disposed of in accordance with federal and state requirements as outlined in Chapter 4, Section 4.6 Hazardous Materials, Solid Waste, and Pollution Prevention. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
10.11	They're going to cut Lumley Road on top of that superfund site, and so I'm very concerned about that.	<p>Comment noted. The Proposed Action includes relocating a portion of Lumley Road and the Lumley-Commerce intersection from the Runway 23R approach Runway Protection Zone. As disclosed in Chapter 4 Section 4.6 Hazardous Materials, Solid Waste, and Pollution Prevention, the relocation of Lumley Road is proposed to cross over the contaminated site. The site recently underwent a Remedial Investigation/Feasibility Study overseen by the USEPA. The FAA has coordinated with the USEPA on this project. In a meeting on June 28, 2022, the USEPA stated that it is acceptable to go below the existing geotextile barrier cap and to change the shape of the soil pile in the potential road relocation area and reconfirmed this in an email dated November 1, 2022. To prevent the potential spread of environmental contamination and worker exposure during construction in this area, a Materials Management Plan (MMP) approved by the USEPA is required prior to construction activities at the NPL Site. The MMP would include procedures for construction worker health and safety, cuts and excavation, erosion and sediment control, soil management, fill and reconstruction, site security, traffic control, contact water, dust mitigation, and equipment decontamination. Per the restrictive covenants filed with the Wake County Register of Deeds, the MMP must be approved by the USEPA prior to beginning work onsite. In addition, all activities that involve disturbing or excavating soils will be performed in accordance with applicable federal, state, and local regulations. Unanticipated contaminated materials may be encountered during construction activities. These materials would be characterized, segregated from uncontaminated soils, and disposed of by a certified hauler at an appropriate permitted disposal facility or kept on-site.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
10.12	<p>You're going to harm and damage the greenways and Lake Crabtree and Umstead Park. They kind of say they are not going to have anything to do that will hurt them, but it will when the superfund site runoff runs.</p>	<p>The East Coast Greenway, Lake Crabtree County Park and William B. Umstead State Park are not within the limits of disturbance for the Proposed Action. The Proposed Action includes mitigation measures and BMPs so that it does not impact the East Coast Greenway, Lake Crabtree or Umstead Park. As a requirement of the Proposed Action, the Airport Authority must comply with all applicable federal and state laws concerning erosion control. An Erosion and Sediment Control Plan would be developed and must be approved by NCDEQ prior to construction. The ESC Plan would identify best management practices and erosion control measures to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact. General design of stormwater control features and their general location have been added to the Final EA. See Chapter 1 Section 1.3 Description of the Proposed Action and Chapter 4 Section 4.13 Water Resources. In addition, to minimize the potential spread of environmental contamination during construction activities at the NPL Site, a Materials Management Plan (MMP) approved by the USEPA would be required prior to construction in the superfund site. The MMP would include procedures for construction worker health and safety, cuts and excavation, erosion and sediment control, soil management, fill and reconstruction, site security, traffic control, contact water, dust mitigation, and equipment decontamination. Per the restrictive covenants filed with the Wake County Register of Deeds, the MMP must be approved by the USEPA prior to beginning work onsite.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
10.13	<p>Extreme care must be used to prevent any sediment from leaving the Ward Transformer Site. All the drainage from this site ends up in Crabtree Creek and William B. Umstead State Park. Currently, the entire Crabtree Creek within William B. Umstead State Park is posted for PCB fish contamination from the Ward Transformer site.</p>	<p>As a requirement of the Proposed Action, the Airport Authority must comply with all applicable federal and state laws concerning erosion control. An Erosion and Sediment Control Plan, approved by the NCDEQ, would be developed prior to construction. The ESC Plan would identify best management practices and erosion control measures to control and contain runoff that could make its way to navigable waterways to minimize the sediment impact. In addition, to prevent the potential spread of environmental contamination during construction activities at the NPL Site, a Materials Management Plan (MMP) would be required. The MMP would include procedures for construction worker health and safety, cuts and excavation, erosion and sediment control, soil management, fill and reconstruction, site security, traffic control, contact water, dust mitigation, and equipment decontamination. Per the restrictive covenants filed with the Wake County Register of Deeds, the MMP must be approved by the USEPA prior to beginning work onsite. No revisions to the Draft EA were necessary to respond to this comment.</p>
<b>11</b>	<b>ENERGY EFFICIENCY AND RECYCLING</b>	

COMMENT #	SUMMARY OF COMMENT	RESPONSE
11.1	<p>The EPA recommends that any offsite disposal of recyclable materials such as concrete, steel, and asphalt prioritize recycling where practicable. The EPA also recommends the use of renewable energy including solar power for supplemental electricity and lighting for the runway, taxiways, and roads that may be constructed.</p>	<p>The Airport Authority is strongly committed to sustainability practices and currently has a program to recycle as much material as practicable. Material that is not suitable for recycling would be disposed of using existing disposal measures, including sending solid and semi-solid waste to a permitted landfill or stockpiled on Airport property. The Proposed Action does not include the use of renewable energy including solar power for supplemental electricity. However, while not a part of the Proposed Action, energy efficient and sustainable measures, including renewable energy sources, will be implemented by the Airport Authority. The Airport Authority currently conducts various initiatives that conserve natural resources, reduces solid waste through recycling efforts, and conserves energy with light-emitting diode (LED) lighting and fritted glass to reduce cooling needs. In addition, the Airport Authority has adopted and is implementing a Sustainability Management Plan (SMP) to improve the tracking and communication of the airport's sustainability initiatives, increase efficiency, and better incorporate economic savings and environmental stewardship into project planning. The SMP provides a road map for the integration of environmental sustainability into its planning, design, construction, maintenance, and operations. RDU has developed sustainability goals that include but are not limited to energy usage, waste management and recycling, emissions, and water consumption. No revisions to the Draft EA were necessary to respond to this comment.</p>
<b>13</b>	<b>HISTORICAL, ARCHITECTURAL, ARCHEOLOGICAL, AND CULTURAL RESOURCES</b>	
13.1	<p>State Historic Preservation Office (SHPO) finds that as proposed the undertaking will not affect any properties listed in or eligible for listing in the National Register of Historic Places.</p>	<p>Comment noted. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
13.2	<p>William B. Umstead State Park, including its forests, is listed under the National Register of Historic Places (NRHP). The Site ID is: WA0721 (Reference number _95000783). Year of Registration: June 30, 1995. Listed under: ‘Crabtree Creek Recreational Demonstration Area” and “Umstead State Park, Raleigh, NC.” William B. Umstead State Park was established in 1934. The boundaries of the Historic District reflect the boundaries of the Park lands that were deeded to the State of North Carolina by the U.S. Department of the Interior (National Park Service) on March 12, 1943.</p>	<p>Comment noted. As stated in Chapter 3, Section 3.5 Section 4(f) the EA states that Crabtree Creek Recreational Demonstration Area, now named the William B. Umstead State Park, is listed on the National Register of Historic Places (NRHP) and was identified as having a portion of William B. Umstead State Park within the GSA. This state park is a 4(f) resource because it is a recreational park of significance to the area, and it is also a 4(f) resource because it is listed on the NRHP. No revisions to the Draft EA were necessary to respond to this comment.</p>
13.3	<p>What is now William B. Umstead State Park started as a Federal Park under the National Park Service (NPS), US Department of Interior in 1934 and was initially called “Crabtree Creek Recreational and Demonstration Project.” The Park became a North Carolina State Park on March 6, 1943 (the deed was dated March 12, 1943 and certified in Wake County on April 6, 1943). Fred Johnson, regional director of the National Park Service, formally presented the deed to Crabtree Creek Park to R. Bruce Etheridge, director of the N.C. Department of Conservation and Development. The Federal government turned over 5,088 acres of land from its Crabtree Creek Recreational and Demonstration Project to the state.</p>	<p>Comment noted.</p>
13.4	<p>The Reverter Clause in the deed states that “upon the express condition that the State of North Carolina shall use the said property exclusively for public park, recreational and conservation purposes.” According to the agreement, the title and right to the possession of the land would revert to the United States of America if it is found that the State of North Carolina uses the property for other purposes.</p>	<p>Comment noted.</p>
<b>14</b>	<b>ENVIRONMENTAL JUSTICE</b>	

COMMENT #	SUMMARY OF COMMENT	RESPONSE
14.1	So as part of environmental justice we need to consider how the Airport's taking Brier Creek Reservoir, which is part of the Crabtree Creek Watershed Program, affects the local people and how they should be compensated.	The Airport Authority plans to use water from Brier Creek Reservoir due to its proximity to the construction site. The water would be removed from Brier Creek Reservoir and applied to the fill material over a period of approximately two years to compact the soil. This process would also allow for Brier Creek Reservoir to be naturally recharged with the same water as it infiltrates back into the groundwater. There would be no taking resource. See Chapter 4 Section 4.11 Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks for a discussion of potential impacts to environmental justice communities. No revisions to the Draft EA were necessary to respond to this comment.
14.2	The EPA recommends RDU and FAA continue coordination efforts such as those identified in Section 5.3 of the Draft EA throughout the proposed development of this project, include any community feedback received within the final EA, and meaningfully engage and work with communities, including those with environmental justice concerns, residing near the project area to address identified impacts and to disseminate project status updates.	Comment noted. The Airport Authority will continue coordination with those with identified noise impacts and people residing near the project area to provide project status updates after FAA's decision on the EA. No revisions to the Draft EA were necessary to respond to this comment.
<b>15</b>	<b>CUMULATIVE</b>	

COMMENT #	SUMMARY OF COMMENT	RESPONSE
15.1	<p>There are other issues and plans afoot that affect our environment and are not included in this plan. Other projects include a new parking lot and quarry in the vicinity of the Airport and we hope cooler heads will prevail and these projects are reconsidered and either abandoned or relocated farther away from environmental, biological, and recreational areas. These other projects should be included in secondary and cumulative effects.</p>	<p>An analysis of cumulative impacts was conducted in the EA. See Chapter 4, Section 4.14 Cumulative Impacts. The analysis of cumulative impacts recognizes that while the impacts of individual actions may be small, when combined with the impacts of past, present, and reasonably foreseeable future actions on populations or resources in and around RDU, the impacts could be potentially significant. Past, present, and reasonably foreseeable future actions included projects both on and off-Airport property. Reasonably foreseeable future actions are defined as those planned to be completed between 2023 and 2028 and that have been developed with enough specificity to provide meaningful data for analysis. The Park Economy 3 parking lot future action is included in the cumulative impacts analysis. The quarry, while in the vicinity of the Airport, is not within the Cumulative Impacts Study Area. For this EA, the Cumulative Impact Study Area is defined as the same boundary as the Proposed Action's General Study Area. The EA concluded that the implementation of the Proposed Action would not result in impacts beyond the General Study Area. It also concluded that there would be no significant cumulative environmental impacts. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
15.2	List the cumulative impacts to William B. Umstead State Park.	<p>This EA follows the methodology and significance criteria included in FAA Order 1050.1F and 5050.4B. An analysis of cumulative impacts was conducted in the EA. See Chapter 4, Section 4.14 Cumulative Impacts. Cumulative impacts are impacts on the environment which result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. The level of cumulative impacts anticipated to occur within the identified environmental resource categories and at William B. Umstead State Park is not significant due to the types of past, present, and reasonably foreseeable future projects, the extent of the built environment in which they would occur, the lack of certain environmental resources in the area, and the mitigation measures identified for the Proposed Action. No revisions to the Draft EA were necessary to respond to this comment.</p>
15.3	<p>The new runway is integral to the reasonably foreseeable redevelopment of a greatly expanded general aviation campus on the north half of RDU (see table 4-26) that will increase light emissions as well as noise to the park. The correct analysis is that the proposed project will enable increased light emissions to the park and thus is a cumulative adverse impact that must be appropriately documented in the EA.</p>	<p>The potential expansion of the general aviation campus requires additional planning by the Airport Authority and review by FAA. When and if the project is ripe for review, the FAA would have to review what regulatory authority it has over the project pursuant to Section 163 of the FAA Reauthorization Act of 2018. FAA would then determine the level of environmental evaluation for this project. As discussed in Chapter 4, Section 4.12 Visual Effects, the light emissions due to the replacement Runway 5L/23R would be moved farther away from William B. Umstead State Park than they are today and therefore, the proposed change in lighting for Runway 5L/23R from the Proposed Action when compared to the No Action Alternative would not significantly increase the overall light emissions to William B. Umstead State Park. No revisions to the Draft EA were necessary to respond to this comment.</p>
16	<b>DOT SECTION 4(f)</b>	

COMMENT #	SUMMARY OF COMMENT	RESPONSE
16.1	<p>William B. Umstead State Park falls under the conditions of Section 6(f) of the Federal Land and Water Conservation Fund (LWCF) Act of 1965, which says that no property acquired or developed with LWCF assistance, shall be converted to other than public outdoor recreation without approval of the Secretary of the Interior. Such approval can be given only if conditions assure that any substituted outdoor recreation property equals the taken property's value, quality, location and usefulness.</p>	<p>Based on the information received from the commenter, a further review was conducted. According to information from the Land and Water Conservation Fund, <a href="https://lwcf.tplgis.org/mappast/">https://lwcf.tplgis.org/mappast/</a>, it was confirmed that LWCF funding was used for William B. Umstead State Park. However, these areas will not be impacted by the Proposed Action. The Proposed Action does not include any conversion of LWCF-assisted land within William B. Umstead State Park to uses other than public outdoor recreation. Additional text was added to Chapter 3 Section 3.5 Department of Transportation Act (DOT) Section 4(f) and Chapter 4 Section 4.5 Department of Transportation Act (DOT) Section 4(f) to reflect this information.</p>



COMMENT #	SUMMARY OF COMMENT	RESPONSE
16.2	<p>In the U. S. Court of Appeals for the Ninth Circuit in the Brook vs. Volpe case (March 2, 1972), the court held that the introduction of noise levels (for example, from airports and roads) into a recreation area is a “taking of land” and is subject to Section 4(f) requirements. Federal agencies (e.g., FAA, USDOT) cannot approve actions requiring the use of properties under Section 4(f) of the DOT Act unless there is no feasible and prudent alternative to the use and the program includes all possible planning to minimize harm from the use.</p>	<p>This EA follows the methodology and significance criteria included in FAA Order 1050.1F and 5050.4B. According to FAA Order 1050.1F, the FAA’s significance threshold for noise is if the Proposed Action would increase noise by DNL 1.5 decibels (dB) or more for a noise sensitive area that is exposed to noise at or above the 65 DNL noise exposure level, or that will be exposed at or above the 65 DNL noise exposure due to a DNL 1.5 dB or greater increase, when compared to the No Action Alternative for the same timeframe. The William B. Umstead State Park would be subject to land use compatibility guidelines within 14 CFR part 150, Appendix A, Table 1. This table states that parks, including state parks and Section 4(f) properties are compatible with noise levels below 65 DNL. As a result of implementing the Proposed Action, the replacement Runway 5L/23R would be 537 feet northwest of the existing Runway 5L/23R which would influence the noise contours. As disclosed in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use and Appendix F Noise, with the implementation of the Proposed Action at RDU the noise contours are moved farther away from William B. Umstead State Park. Therefore, the William B. Umstead State Park would experience a net reduction in noise exposure due to the Proposed Action as compared to the future No Action Alternative. Based on these findings the William B. Umstead State Park would not be considered impacted by the Proposed Action and would not require special consideration. Additional text was added in Chapter 4 Section 4.10 Noise and Noise-Compatible Land Use to clarify. No USDOT Act Section 4(f) resources would experience a physical or constructive use resulting from implementation of the Proposed Action.</p>
16.3	<p>The 61-acre Piedmont Beech Natural Area is located along Crabtree Creek within William B. Umstead State Park. It is one of the best examples of mixed mesophytic forest in the eastern Piedmont of North Carolina. Portions of the site contain unusual examples of good, maturing stands of beech. This was designated as a National Natural Landmark in 1974.</p>	<p>Comment noted. The Proposed Action does not include any direct or indirect impacts to the Piedmont Beech Natural Area within the William B. Umstead State Park. No revisions to the Draft EA were necessary to respond to this comment.</p>

COMMENT #	SUMMARY OF COMMENT	RESPONSE
16.4	<p>The EA employs an incorrect noise threshold for the State Park. This section must be rewritten to account for obvious 4(f) constructive use impacts to the park including cumulative impacts from foreseeable actions linked to the new runway.</p>	<p>This EA follows the methodology and significance criteria included in FAA Order 1050.1F and 5050.4B. According to FAA Order 1050.1F, the FAA's significance threshold for noise is if the Proposed Action would increase noise by DNL 1.5 decibels (dB) or more for a noise sensitive area that is exposed to noise at or above the 65 DNL noise exposure level, or that will be exposed at or above the 65 DNL noise exposure due to a DNL 1.5 dB or greater increase, when compared to the No Action Alternative for the same timeframe. The William B. Umstead State Park would be subject to land use compatibility guidelines within 14 CFR part 150, Appendix A, Table 1. This table states that parks, including state parks and Section 4(f) properties are compatible with noise levels below 65 DNL. The Proposed Action does not include a constructive use or direct taking (physical use) of William B. Umstead State Park. See Chapter 4 Section 4.5 Section 4(f) and 4.7 Historical, Architectural, Archaeological, and Cultural Resources. No revisions to the Draft EA were necessary to respond to this comment.</p>