Environmental Assessment for Airport Business Park Development

Oneida County | Rome, New York

Volume 1: Final Environmental Assessment

June 2025

Prepared by:
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Oneida County

Griffiss International Airport

Environmental Assessment for Airport Business Park Development

Prepared by: C&S Companies

Final — June 2025

This Environmental Assessment becomes a Federal document when evaluated, signed, and dated by the Responsible FAA Official.

Responsible FAA Official: _____ **Date**: July 24, 2025

At the time the draft of this Environmental Assessment was prepared and published for public comment, the White House Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 C.F.R. Parts 1500 – 1508) were in effect, along with Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (Feb. 11, 1994) and EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis (Jan. 20. 2021). These regulations and executive orders collectively required the FAA to analyze a project's potential impacts on environmental justice and the social cost of carbon as well as the cumulative impacts of the project as part of its NEPA analysis. On January 20, 2025, President Trump issued Executive Order (EO) Number (No.) 14154, Unleashing American Energy, which revoked EO 13990 as well as EO 11991, Relating to Protection and Enhancement of Environmental Quality (May 24, 1977) and instructed the Chair of the Council on Environmental Quality (CEQ) to rescind its NEPA-implementing regulations. The CEQ published an interim final rule on February 25, 2025, announcing the removal of its NEPA-implementing regulations effective April 11, 2025. On Jan. 21, 2025, President Trump issued EO 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity, which rescinded EO 12898. As a result, this EA contains numerous redactions of references to now-rescinded regulations or of analysis that was required at the time of preparation of the draft EA, but that was not relied upon in the FAA's finding. In addition, though FAA Order 1050.1G, FAA National Environmental Policy Act Implementing Procedures was published on June 30th, 2025, preparation of this EA was approved for completion pursuant to FAA Order 1050.1F and pursuant to current Executive Orders and current case law.

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION (FAA)

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Location

Griffiss International Airport (RME)
Oneida County, Rome, NY

Proposed Federal Action

The proposed federal action is the provision of consent, pursuant to 14 CFR 155.7(e), for a change in use from aeronautical to non-aeronautical use of approximately 230 acres of obligated airport property located on three parcels of land at RME. The Environmental Assessment uses the broader term land release, but for this action the Federal obligations will remain in place and there will be no release of property. The written consent provides the Federal approval for the nonaeronautical use, consistent with the FAA land use change policy issued on December 8, 2023 (88 Fed. Reg.85,474). This Finding of No Significant Impact (FONSI) provides the necessary environmental determination to support FAA approval of a change to the Airport Layout Plan (ALP) pursuant to 49 U.S.C. 47107(a)(16) and land use consent, allowing the Sponsor to enter a future long-term lease for non-aeronautical use to allow for mixed-use development.

The attached environmental assessment analyzes the potential environmental impacts of the proposed Federal action in accordance with the National Environmental Policy Act of 1969, as amended (NEPA; 42 United States Code [U.S.C.] § 4321 et seq.); and FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.[1, 2, 3]

Background

The airport is located on land transferred through the Defense Base Closure and Realignment Act of 1990 to Oneida County. The related Quitclaim Deeds require that surplus property not be used, leased, sold, salvaged, or disposed of by the County for other than airport purposes without the written consent of the FAA.

The February 2016 Airport Master Plan Update (MPU) identified a large amount of airport property as not needed to accommodate forecasted aviation demand. Oneida County is the airport sponsor and is considering the use of this land, known as the 'Triangle Area' for aviation and non-aviation development that would generate additional revenue for the County to assist in offsetting operational expenses at the airport. A preferred development plan was selected for the 'Triangle Area' and is shown on the approved Airport Layout Plan dated April 2016.

Project Description

The proposed project involves the conveyance of approximately 230 acres of airport property to enable aeronautical land to be utilized for future non-aeronautical mixed-use development. The future development involves the following:

- Excavating/grading of approximately 135.5 acres of land that includes:

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[1] On January 20, 2025, President Trump issued Executive Order (EO) Number (No.) 14154, *Unleashing American Energy*, which revoked EO 11991, *Relating to Protection and Enhancement of Environmental Quality* (May 24, 1977) and EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis* (Jan. 20. 2021) and instructed the Chair of the Council on Environmental Quality (CEQ) to rescind its NEPA-implementing regulations. The CEQ published an interim final rule on February 25, 2025, announcing the removal of its NEPA-implementing regulations effective April 11, 2025. As a result, the FAA does not consider cumulative impacts or the impacts of greenhouse gases on the climate in reaching its finding.

[2] On Jan. 21, 2025, President Trump issued EO 14173, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity*, which rescinded EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (Feb. 11, 1994). As a result, the FAA does not consider impacts to environmental justice communities in reaching its finding.

[3] On July 3, 2025, FAA published a Notice in the Federal Register rescinding FAA Order 1050.1F and issuing FAA Order 1050.1G to align with amendments to NEPA and to reflect CEQ's February 25, 2025, interim final rule (see footnote 1). However, FAA prepared the EA supporting this FONSI in prior to the revocation of FAA Order 1050.1F and therefore prepared this FONSI in accordance with FAA Order 1050.1F.

  - New building construction (43.9 acres: 33.3 acres non-aeronautical buildings and 10.6 acres of aeronautical buildings)
  - Installation of utility corridors to connect to public systems
  - Installation of five stormwater management areas
  - Construction of paved roads and automobile parking areas and installation of transportation infrastructure
  - Construction of traffic roundabout
  - Construction of aircraft parking apron
  - Construction of noise barrier
  - Landscaping
  - Installation of new perimeter fence (12,035 linear feet) and removal of existing perimeter fence (11,163 linear fence)
- Reserved greenspace (8.5 acres)
- Removal of 17.5 acres of trees and 340 individual trees
- Demolition of two buildings
  - Building 222 (former Hush House Building 5771)
  - Tactical Air Navigation System (TACAN) electrical building
- Establishment of a 187 acre upland sandpiper mitigation site
- Land acquisition or property transfer
  - Fee simple for traffic roundabout, 0.05 acres
  - Utility corridor easements, 4.39 acres
- Temporary construction easements for road improvements and traffic roundabout, 0.25 acres
- Property transfer to New York State for traffic roundabout, 0.89 acres
- Property transfer to City of Rome for utility corridor (sewer), 0.75 acres

Purpose and Need

The purpose of the proposed project is to provide the airport sponsor with additional revenue streams by utilizing existing airport property for non-aeronautical development. This is consistent with the sponsor's obligation to improve its financial self-sufficiency pursuant to AIP Grant Assurance 24. The 2016 Airport Master Plan update determined that the subject property is not needed for future aeronautical development.

The need for the proposed project is to support the sponsor in becoming as self-sustaining as possible by maintaining a fee and rental structure for facilities on airport property; earned revenue from future leases would be used to support airport capital improvements, repair, and operations activities that would directly benefit the airport.

Alternatives

Four project alternatives were considered.

Alternative 1 - No Action Alternative: The No Action Alternative maintains the current aeronautical use designation for the property; non-aeronautical development of the property would not occur leaving the property in its current condition. The No Action Alternative does not meet the purpose and need of the project.

Alternative 2 – Aeronautical-Use Focused Development Alternative: This alternative focuses on Aeronautical-Use Focused development. It includes 135.5 acres of aeronautical uses, 137 acres of non-aeronautical uses, hangar or building facilities, associated aircraft parking apron, auto parking, roadways, and utilities. It is anticipated that interested entities would construct facilities to meet their respective needs, provided the development is compliant with 14 CFR Part 77 guidelines and is compatible with airport operations. This alternative would not maximize non-aeronautical development on site and highlights that 95 acres are available in other areas on airport property that could accommodate aeronautical uses. It would generate fewer employment opportunities, utilize smaller non-aeronautical parcels that would compete with

other available development sites nearby, includes one access road with overlapping truck and automobile traffic, and would have the highest potential environmental impacts. Based on this, Alternative 2 was eliminated from further consideration in the EA.

Alternative 3 – Multi-Use Aeronautical & Non-Aeronautical Development Alternative: This alternative focuses on Multi-Use Aeronautical & Non-Aeronautical development. It includes 60.5 acres of aeronautical uses, 191 acres of non-aeronautical uses, hangar or building facilities, associated aircraft parking apron, automobile parking, roadways, and utilities. It is anticipated that interested entities would construct facilities to meet their respective needs, provided the development is compliant with 14 CFR Part 77 guidelines and is compatible with airport operations. This alternative would not maximize non-aeronautical development on site and highlights that 95 acres are available in other areas on airport property that could accommodate aeronautical uses. It would utilize smaller non-aeronautical parcels that would compete with other available development sites nearby, includes one access road with overlapping truck and automobile traffic, and would have the least revenue potential and lowest average wage compensation for new jobs. Based on this, Alternative 3 was eliminated from further consideration in the EA.

Alternative 4 – Maximum Non-Aeronautical Development Alternative (Preferred Alternative): This alternative focuses on Maximum Non-Aeronautical Buildout development. It includes 43.5 acres of aeronautical use, 259 acres of non-aeronautical uses, hangar or building facilities, associated aircraft parking apron, automobile parking, roadways, and utilities. It is anticipated that interested entities would construct facilities to meet their respective needs, provided the development is compliant with 14 CFR Part 77 guidelines and is compatible with airport operations.

This alternative was selected as the preferred alternative since it provides large manufacturing and/or manufacturing/R&D sites to promote economic growth and accommodate demand in the region, provides two access roads to separate truck and automobile traffic, generates the highest revenue and job compensation, maximizes non-aeronautical development, and meets the purpose and need to enable the Airport to become more financially self-sustaining.

Discussion

The attached *Final Environmental Assessment (EA) for Airport Business Park Development*, dated June 2025 addresses the effects of the proposed project on the quality of the human and natural environment and is made a part of this Finding. The following impact analysis highlights the more thorough analysis presented in the EA document.

Air Quality

The proposed project site is located in Oneida County, which is in attainment for all criteria pollutants, therefore a General Conformity analysis is not required. Construction activities may result in short-term impacts to air quality including emissions from construction equipment, fugitive dust and particulates from earthwork and site preparation, and emissions from motor vehicles and haul trucks. These impacts would be temporary and are expected to affect the immediate vicinity of the construction site. Impacts from day-to-day activities post-construction would be localized and related to building heating and cooling systems and emissions from vehicle and truck traffic from those accessing the site. Significant impacts to air quality are not anticipated as a result of this project.

Biological Resources

Implementation of the proposed project would result in habitat alternation including the loss of 17.5 acres of successional northern hardwoods with 8.5 acres remaining and the loss of 62.41 acres of mowed lawn with 30 acres remaining. The United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) website indicated that the endangered Northern Long-Eared Bat (NLEB) (*Myotis septentrionalis*), the proposed endangered Tricolored Bat (TCB) (*Perimyotis subflavus*), and the proposed threatened Monarch Butterfly (*Danaus plexippus*) may occur in the vicinity of the project location. A Species and Habitat Assessment was conducted to determine if the project area had suitable foraging and

roosting/breeding habitat for federally protected species. The results of this assessment concluded that the project area does not have the potential to contain NLEB or TCB roosting/breeding habitat but does have the potential for suitable foraging habitat and does have the potential to contain Monarch Butterfly habitat.

The USFWS has developed determination keys as part of the IPaC tool to streamline review of projects for potential effects on federally listed species. The NLEB determination key resulted in a determination of "*Not Likely to Adversely Affect*" and the TCB determination key resulted in a determination of "*May Affect*" (a determination key is not yet available for the Monarch Butterfly). The FAA initiated consultation with USFWS with determinations of "*Not Likely to Adversely Affect*" the NLEB, "*May Affect, Not Likely to Adversely Affect*" the TCB (TCB), and "*No Effect*" for the Monarch Butterfly. Continued coordination resulted in an April 25, 2025 concurrence from the USFWS on determinations of "*May Affect but Not Likely to Adversely Affect"* for the NLEB and "*Not Likely to Jeopardize the Continued Existence*" for the TCB and Monarch Butterfly with the inclusion of the conservation measure that tree removal would only occur between November 1 and March 31 when bats are in hibernation.

The project location was also found to contain suitable habitat for the New York State threatened Upland Sandpiper (*Bartramia longicauda*). Project implementation is expected to involve the loss of 62.41 acres of Upland Sandpiper habitat. Coordination has been conducted with the New York State Department of Environmental Conservation (NYSDEC) with recommendations for avoidance and minimization measures to protect the species as well as compensatory mitigation measures.

Hazardous Materials

The proposed project area was formerly part of the Griffiss Air Force Base, a 3,550-acre base that was the site of various Air Force operations from 1943 until its deactivation in September 1995. During its 50 years of operation, hazardous wastes were generated from various activities including: aircraft operation; testing and maintenance; firefighting exercises; discharge of munitions; landfill operations; and research and development activities. Over the years, these wastes were disposed of in landfills and dry wells located across the base. Griffiss Air Force Base (a portion of which is currently Griffiss International Airport) is on the Superfund National Priorities List (NPL) because hazardous chemicals were found in the soil and groundwater. Since its listing in 1987, approximately 2,900 acres of the Superfund site have been delisted from the NPL. 650 acres remain on the NPL and are in various stages of remediation and monitoring.

According to the US Environmental Protection Agency (USEPA) Superfund website, the site is listed as "under control" for human exposure status and for contaminated groundwater control status, and all known potential risks to public health and the environment have been addressed and are currently under control. The risk from exposure to contamination remaining at the former Griffiss AFB is very limited according to the listing.

As part of the former Griffiss Air Force Base, the Airport site is part of the Installation Restoration Program (IRP), which is a comprehensive program designed to address contamination from past activities and restore former Air Force lands to useable conditions. As part of the IRP program, land restrictions were placed on the sites to 1) Prevent the public from encountering the contaminants by restricting development and use of the property to industrial, commercial, and non-residential land use and 2) soil/groundwater intrusive work, groundwater consumption, and groundwater well installation are prohibited without prior approval from the New York State Department of Health (NYSDOH).

According to USAF documents, PFC (perfluorinated compounds) impacted soil, and groundwater is present at the former Fire Protection Training Area (FPTA) which is located adjacent to the proposed project area. Based on this, there is a potential that contamination, including contamination from per- and polyfluoroalkyl substances (PFAS) could extend into the project area. Polychlorinated biphenyl (PCB) impacted soil is also present within the far southern extent of the project area. Groundwater use is

prohibited, contaminated soil cannot leave the site limits, and the USAF must be notified before excavation work. Further, the site can only be used for industrial, commercial, and non-residential use.

Should hazardous substances, contaminated soils, or other regulated materials be encountered during any phase of construction, they will be handled using best management practices (BMPs) and in accordance with all applicable regulations. Specific measures are further described in the EA.

The proposed project may involve the disturbance of contaminated materials. However, hazardous material impacts will be minimized below significant impact thresholds with the incorporation of the recommended mitigation measures and use of construction best management practices. It is expected that regional facilities have adequate capacity to accommodate the additional solid waste, and all necessary federal, state, and local permits will be obtained prior to construction activities. As a result, implementation of the proposed project would not result in significant hazardous materials, solid waste, or pollution prevention impacts.

Historical, Architectural, Archaeological, and Cultural Resources

Review of the Cultural Resource Information System (CRIS) indicated archaeologically sensitive areas within or adjacent to the project area. As a result, consultation was conducted with the New York State Office of Parks, Recreation, and Historic Preservation (SHPO). On July 15, 2021, SHPO stated it has no concerns regarding the proposed development's potential to affect historic architectural resources. However, SHPO noted that there are three archaeological sites (Site 16A, Site 18/19, and Site 24) within the project area that have been recommended as eligible for listing in the New York State and National Registers of Historic Places (NRHP). SHPO further recommended avoidance of physical disturbance of these sites and would require additional archaeological investigation including relocating the sites and assessing their current integrity should disturbance not be avoidable.

A Phase II Archeological Site Evaluation was completed in February 2023 and in March 2023, SHPO concurred with the report recommendations that due to loss of site integrity, Sites 16A and 18/19 were no longer eligible for inclusion on the NRHP and that no additional archeological investigation was warranted. SHPO also concurred with the report recommendation that Site 24 retained its integrity and NHRP eligibility status and that Site 24 should be avoided or subject to Phase III mitigation. Additional protective measures to be implemented include: marking of Site 24 on the site plan map as "Environmentally Sensitive, Do Not Impact"; marking the site with exclusionary fencing by a NYSHPO approved archaeologist prior to the start of construction; and utilization and maintenance of soil erosion and sediment control plans during construction. Provided Site 24 is avoided, and protective mitigation measures are included, implementation of the proposed project is not expected to result in adverse effects to historic resources.

Department of Transportation Act, Section 4(f) Resources

Properties in the vicinity of the proposed project area were determined to be Section 4(f) resources. Of these, Griffiss International Sculpture Garden and Nature Trail, the above discussed Archaeological Site 24, and the Bomber Disc Golf Course are Section 4(f) properties and are located within the proposed project area.

The proposed project includes the construction of a utility corridor and acquisition of an easement on Section 4(f) property, Griffiss International Sculpture Park and Nature Trail. Impacts include acquisition of a 1.3-acre utility corridor easement to facilitate the removal and restoration of approximately 1,175 linear feet of paved nature trail and automobile parking area pavement to install an underground duct bank and utilities.

Construction activities include trenching, backfilling/compaction, grading, reseeding, and construction vehicle access. Impacts will be temporary, and areas will be restored to existing conditions upon completion of construction activities. To minimize these temporary impacts, construction in the 4(f) properties would be limited to winter months to avoid/minimize interruption of public use of the properties, the utility corridor would be maintained as close as possible within the existing Ellsworth Road right-of-way, and any trees

within the Section 4(f) properties that may need to be removed would be replaced at a 1:1 ratio with replacement plantings.

Based on the above, FAA has made a Section 4(f) *de minimis* impact determination.
Construction of the utility corridor and acquisition of easements associated with the proposed project will not adversely affect the activities, features, and attributes that qualify the affected property for protection under Section 4(f) of the Department of Transportation Act.

Land Use and Zoning
The proposed project would convert vacant land to a mix of aeronautical and non-aeronautical development and would not cause a significant impact or change to existing land use designations on or surrounding airport property. The proposed project is considered compatible with local land use and zoning regulations. Therefore, no significant impacts to land use are expected.

As part of any future lease agreements, the sponsor would include avigation easement(s) requiring new development to comply with 14 CFR part 77 restrictions to ensure that development is compatible with Airport operations and meets FAA design standards for the continued safe and secure use of the property.

Water Resources
The total impervious area associated with the proposed project would increase from 45.57 acres to 113.6 acres because of construction activities for access roads, roadway improvements, automobile parking areas, aircraft parking apron, and new buildings. Approximately 40% of the entire 286-acre site would be impervious surfaces with the remaining 60% of the site remaining undeveloped. Stormwater runoff from the newly created impervious areas will be contained onsite through the construction of stormwater management infrastructure (i.e., stormwater drainage basins, dry swales, and installation of new drainage pipes).

A Drainage Study was conducted and determined five new stormwater management areas would need to be constructed ranging in size from 43,000 SF to 262,226 SF. Comparison of existing and proposed peak flow rates for the overall development area with incorporation of the proposed stormwater management infrastructure indicates no increase in peak flow
discharge rates overall or per drainage area.

Wetland delineations were conducted and found two wetlands totaling 0.39 acres in or adjacent to the project area. The proposed project will avoid both of these wetlands. No additional surface water resources were identified within the proposed project area. Future site development would also require a Storm Water Pollution Prevention Plan (SWPPP) for construction activities, including a soil and erosion control plan, as well as compliance with the State Pollutant Discharge Elimination System (SPDES) Permits.

Noise and Traffic
The proposed project would not affect airport activity levels or capacity, change the number or type of aircraft operating at the Airport, or change current runway threshold locations and therefore would not influence overall aircraft-generated noise. The proposed project would have no impact on the DNL 65 noise contour or introduce noise sensitive areas within the contour and would maintain noise-compatible land uses in proximity to the Airport.

However, post construction, the proposed project is estimated to generate over 600 vehicle trips during each typical commuter AM and PM peak hour from employees and trucks associated with the large manufacturing facility (1,000,000 SF). A traffic assessment conducted to evaluate these impacts concluded with recommendations for intersection signalization, turning lanes and the construction of a traffic roundabout to alter traffic patterns and avoid and minimize impacts from traffic. To address noise related impacts from the additional vehicle traffic, a 10-foot high, 450-foot-long noise barrier would be installed adjacent to four residential properties along Tomkins Avenue and within the road right-of-way.

With the installation of a noise barrier and other minimization efforts, implementation of the proposed project is not expected to result in adverse effects from noise and traffic.

Other Impact Categories

The impacts of the proposed project on coastal resources, farmlands, natural resources and energy supply, socioeconomic, wild and scenic rivers, and reasonably foreseeable impacts were evaluated in the EA. It is the FAA's finding that the proposed project will not have any significant effect on any of the above noted categories.

Public Involvement

The Draft EA and Draft Section 4(f) Determination were available for review for a period of 30 days (December 17, 2024 to January 17, 2025) and was extended for an additional 30 days (until February 17, 2025).

A Notice of Public Availability was published in *The Observer Dispatch* on December 17, 2024 and *Rome Daily Sentinel* on December 26, 2024. The Draft EA was made available via the Airport website https://oneidacountyny.gov/departments/planning/public-notices/. Hard copies were made available at Griffiss International Airport, Rome, NY and Jervis Public Library, information desk, Rome, NY. Further, affected property owners were notified by individual letters, and involved governmental agencies were notified by letter/email.

The public comment period closed on February 17, 2025. Comments were received from the public and involved agencies. These comments focused on concerns regarding noise and traffic and also included recommendations regarding hazardous materials and future coordination regarding hazardous materials management, air quality, water resources, threatened and endangered species, and cultural resources. Letters responding to commentors were sent with copies included in the EA Appendices. The comments resulted in minor edits to the Draft EA to clarify and further explain the respective issues.

Mitigation Measures

1. Construction contract provisions shall contain the provisions of Advisory Circular (AC) 150/5370-10, "Standard Specifications for Construction of Airports" item P-156, temporary air, water pollution, soil erosion and siltation control and AC 150/5320-5, "Airport Drainage Design."

2. All necessary studies and permits for construction of the proposed project and associated mitigation, including zoning changes shall be obtained prior to construction.

3. To minimize and avoid any potential impact to protected species, tree clearing and trimming shall only be conducted between November 1 through March 31.

4. Use and maintenance of soil erosion and sediment control plans and Best Management Practices during construction.

5. To address impacts to cultural resources, avoid the use of archeologically sensitive Site 24, mark Site 24 on the site plan map as "Environmentally Sensitive, Do Not Impact", and mark Site 24 with exclusionary fencing by a SHPO approved archaeologist prior to the start of construction.

6. Inclusion of avigation easement(s) as part of any future lease agreement requiring new development to comply with 14 CFR part 77 restrictions to ensure that development is compatible with Airport operations and meets FAA design standards for the continued safe and secure use of the property.

CONCLUSION AND APPROVAL:

After careful and thorough consideration of the facts contained herein, the undersigned finds the federal action is consistent with existing national environmental policies and objectives as set forth in Section 101 (a) of the National Environmental Policy Act of 1969 (NEPA) and it will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to Section 102(2)(c) of NEPA.

Recommended: _____ July 24, 2025

Environmental Program Manager — Date
Eastern Region

Approved: EVELYN J MARTINEZ Digitally signed by EVELYN J MARTINEZ Date: 2025.07.24 14:47:17 -04'00'

_____ _____

Manager — Date
New York Airports District Office

Disapproved: _____ _____

Manager — Date
New York Airports District Office

This FONSI constitutes a final agency action and a final order taken pursuant to 49 U.S.C. §§ 40101 et seq., and constitutes a final order of the FAA Administrator which is subject to exclusive judicial review by the Courts of Appeals of the United States in accordance with the provisions of 49 U.S.C. § 46110. Any party having substantial interest in this order may apply for a review of the decision by filing a petition for review in the appropriate U.S. Court of Appeals no later than 60 days after the order is issued in accordance with the provisions of 49 U.S.C. § 46110.

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1 Introduction

This Environmental Assessment (EA) documents the evaluation of potential impacts associated with the proposed Airport Business Park Development Plan at the Griffiss International Airport ("RME or Airport"), which is owned and operated by Oneida County ("County").

Planning efforts started in 2009/2010 identified a "Triangle Area" at RME to be developed for a mix of aeronautical and non-aeronautical uses[1] to generate additional revenue and offset operating expenses. Aeronautical-related development areas provide access to the runways and taxiways and include uses such as Fixed Base Operators (FBOs), air cargo, hangar development, and specialty aviation services (i.e., aircraft maintenance and repair, flight training, etc.). Non-aeronautical related development areas do not provide access to the runways and taxiways and include uses such as retail, commercial, industrial, or manufacturing. Proposed development in the "Triangle Area" is shown on the 2016 approved Airport Layout Plan drawing. In 2021, the County conducted preliminary planning, environmental, and conceptual design efforts with the goal of making the site shovel-ready for development. In 2022, the County started a Land Release and EA for the Airport Business Park Development Plan ("Proposed Project "), as well as preliminary design of utility corridors.

This EA has been prepared to meet the requirements of the National Environmental Policy Act of 1969 (NEPA) and the New York State Environmental Quality Review Act (SEQR) to address potential impacts associated with the Proposed Project while providing the opportunity for public involvement and comments. This EA follows the guidelines and organizational structure recommended in the following documents:

- Federal Aviation Administration (FAA) Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions* (hereinafter referred to as FAA Order 5050.4B)
- FAA Order 1050.1F, *Environmental Policies and Procedures* (hereinafter referred to as FAA Order 1050.1F)
- FAA 1050.1F Desk Reference

Since the Proposed Project would require federal approval and funding determinations by the FAA, the EA must comply with NEPA and other federal special purpose laws.

The EA includes the following sections:

- Introduction
- Purpose and Need
- Alternatives of Airport Development
- Affected Environment, Environmental Consequences, and Mitigation
- Agency Coordination and Public Involvement

1.1 Proposed Project Location and Existing Facilities

The Griffiss International Airport, formerly known as the Griffiss Air Force Base, is situated on 1,680 acres of land and lies within the City of Rome and the Town of Floyd. The Airport is approximately three miles from downtown Rome, 18 miles east of the City of Oneida, and 15 miles west of the City of Utica (**Figure 1.1**). RME serves general and corporate aviation as well as the military, and it is one of seven nationally designated unmanned aerial systems (UAS) test sites.

[1] Also referred to as aviation and non-aviation uses

Figure 1.1 - Location Map



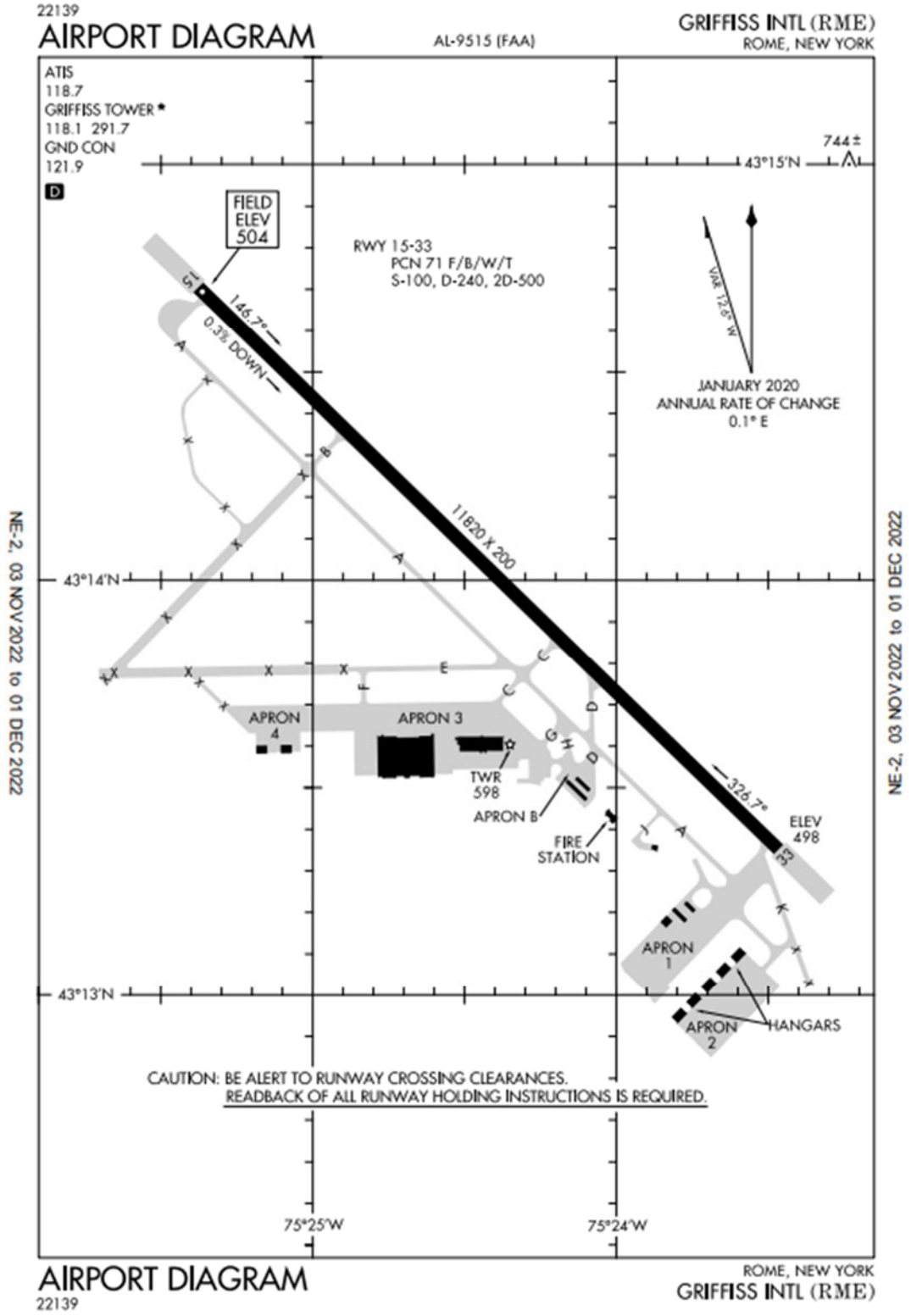
Source: C&S Engineers, Inc.

Landside facilities at the Airport include FAA Control Tower; general aviation multi-use terminal building; U.S. Customs & Border Protection Federal Inspection Station (FIS) building; commercial facilities; public facilities; Not-for-Profit facilities; Maintenance, Repair & Overhaul (MRO) facilities, and government facilities (i.e., Rome Research Site). As well as, four large aircraft parking aprons, T-Hangars and conventional hangars, and an Aircraft Rescue and Firefighting (ARFF)/Snow Removal Equipment (SRE) building (**Figure 1.2**).

Airside facilities at the Airport include one runway, ten taxiways, lighting, and navigational aids. Runway 15-33 is 11,820 feet long and 200 feet wide, has precision instrument markings, and high intensity runway lights. The taxiway system at the Airport consists of ten active taxiways with medium intensity taxiway lights (MITL). Six taxiways have been designed to accommodate large aircraft and four have been designed to accommodate general aviation aircraft (**Figure 1.2**).

Electronic navigation aids at the Airport include a Category 1 instrument landing system (ILS) on Runway 33; global positioning system (GPS); and an automated surface observing system (ASOS). Visual aids to navigation at the Airport include four-box precision approach path indicators (PAPIs) on both runway ends, a medium approach lighting system with runway alignment indicator lights (MALSR) on Runway 33, runway end identifier lights (REILs) on Runway 15, wind cones, and a rotating beacon.

Figure 1.2 - Airport Diagram



Source: FAA Airport Data and Information Portal, Airport Diagram Chart, accessed 11-7-22

1.2 Proposed Project Background

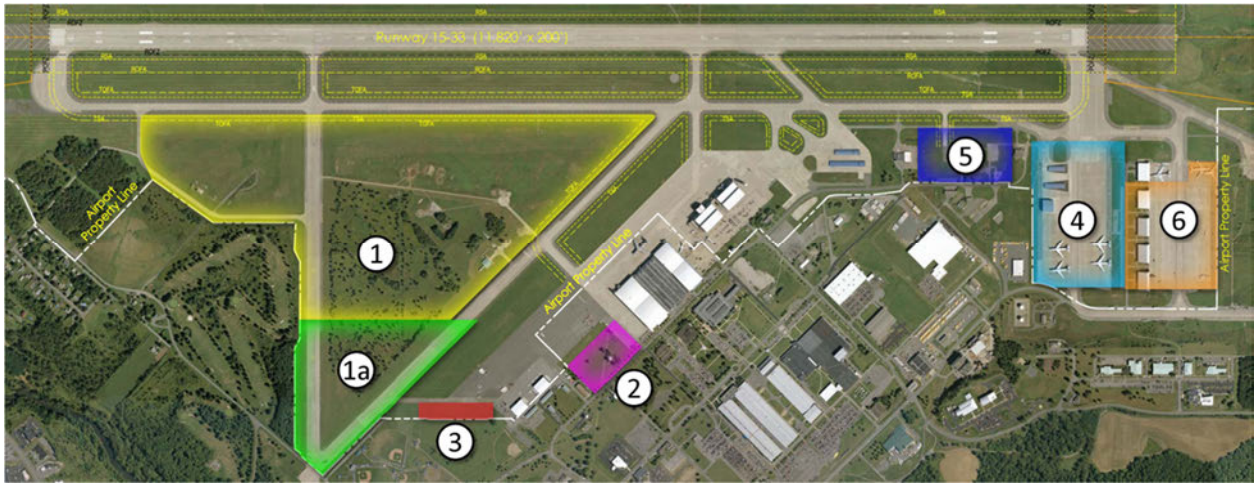
This section summarizes the planning, environmental, and design efforts the County has completed that support the need for an Airport Business Park Development Plan at the Airport.

1.2.1 Griffiss International Airport Business Plan

A Business Plan was completed by MacFarland-Johnson, Inc. in association with R.A. Weidemann & Associates, Inc. in May 2010 to identify potential development opportunities that could generate jobs and additional operating revenues, as well as reduce operating expenses at the Airport.

One of the goals of the Business Plan was to identify aviation and non-aviation development opportunities for the Airport. There is a significant amount of land that is not needed to accommodate the 20-year forecasted demand that can be utilized for future development opportunities at the Airport. There are several areas that can be utilized for either aviation-related development, such as hangars, aprons, or an air cargo facility, or for non-aviation or aviation-related industrial development which would benefit from the close proximity to the airfield. The Airport's selection as one of six test sites to conduct testing and research to safely integrate unmanned aircraft systems (UAS) into the National Airspace System was seen as a potential catalyst for new development. Seven development areas were identified in the Business Plan (**Figure 1.3**). Three of the seven areas are included within the limits of the proposed Airport Business Park Development Plan limits (i.e., sites 1, 1a, and 3).

Figure 1.3 - Potential Development Sites



Source: Griffiss International Airport Business Plan, May 2010

The Business Plan also discussed three agencies involved in economic development in areas surrounding the Airport and recommended more collaboration between the County and these agencies to promote economic growth and development opportunities at the Airport. These agencies include: Griffiss Local Development Corporation (GLDC); Mohawk Valley Economic Development Growth Enterprises (EDGE); and Oneida County Industrial Development Agency (IDA).

Griffiss Local Development Corporation: is a not-for-profit agency established by New York State in 1994 that is charged with facilitating and coordinating the redevelopment efforts at Griffiss Business & Technology Park. GLDC is responsible for implementing the reuse plan of the decommissioned Griffiss Air Force Base.

As shown on **Figure 1.4**, GLDC and Oneida County developed a proposed Airport Business and Industrial Park plan for RME. Three land use areas were identified within the limits of the proposed Airport Business and Industrial Park (aviation, office/R&D, and light industrial).

Figure 1.4 - GLDC Airport Business and Industrial Park Plan



Source: Griffiss International Airport website, accessed 11-7-22

Mohawk Valley EDGE: is a private, not-for-profit corporation serving as the economic development agency for Oneida and Herkimer Counties. EDGE provides staff to GLDC and is an integral part of the long-term effort by the County to strengthen opportunities and open the door for new businesses and industries to locate and grow within the Griffiss Business & Technology Park, as well as the broader areas of the two-county area it serves.

EDGE promotes and markets specific sites available to industrial development and site selection specialists and real estate brokers representing businesses both inside and outside the Mohawk Valley. It also links the area's economic development organizations by developing financing, incentive, and other assistance packages to help companies interested in locating or expanding their operations and job base in Oneida and Herkimer Counties

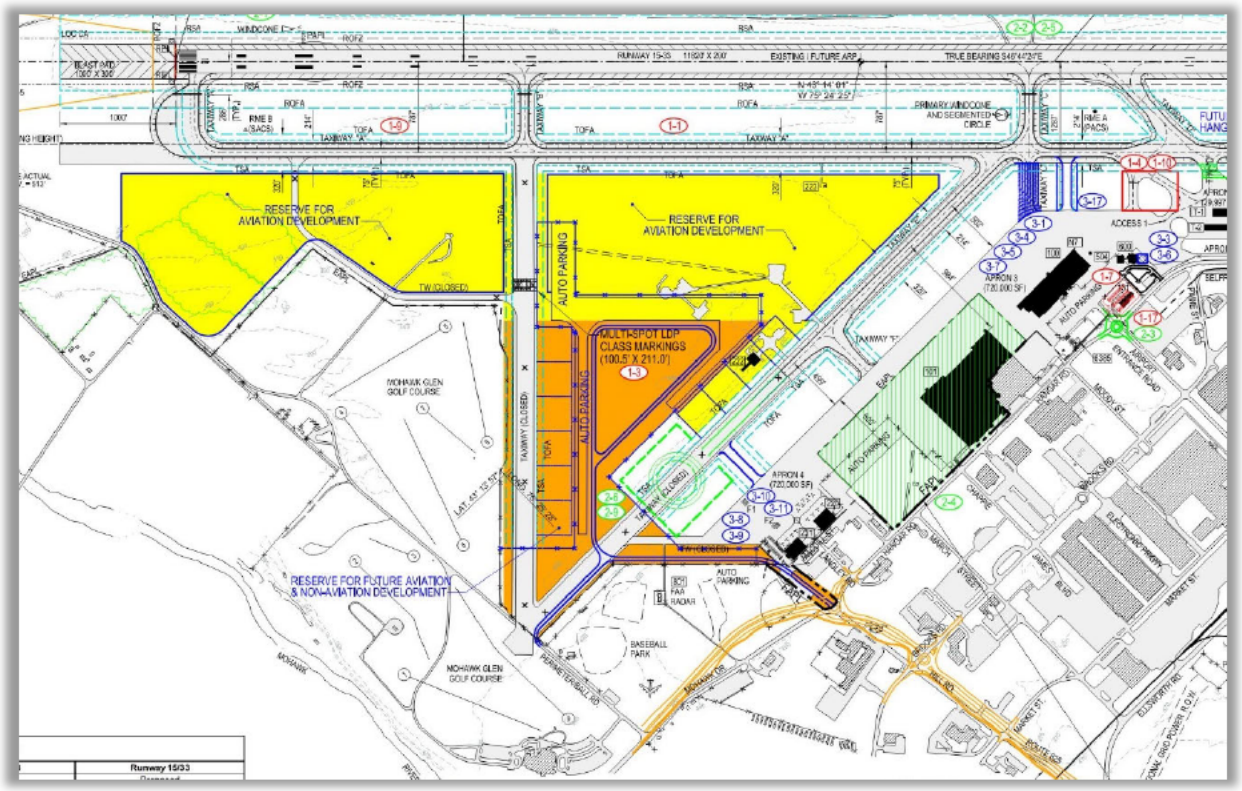
Oneida County Industrial Development Agency: is a public benefit corporation of New York State offering financial incentives for hands-on manufacturing and other eligible projects. The IDA is an arm of County government that exists for the benefit of the County, whereas the GLDC is independent of local government (both Oneida County and the City of Rome).

1.2.2 Airport Master Plan

An Airport Master Plan (AMP) Update was completed by C&S Engineers, Inc. in February 2016. The AMP Update identified a large amount of land on airport property that is not needed to accommodate forecasted demand. As a result, the AMP evaluated alternatives that would provide the best use of seven potential development areas identified in 2010 Business Plan (**Figure 1.5**). The alternatives focused on aviation and non-aviation uses that would generate additional revenue for the County to assist in offsetting operational expenses at the airport.

A preferred development plan was selected for the "Triangle Area" and shown on the approved Airport Layout Plan dated April 2016 (**Figure 1.5**).

Figure 1.5 - Approved Airport Layout Plan Drawing Excerpt



Source: Griffiss International Airport Approved Airport Layout Plan Drawing, 2016

1.2.3 Planning, Environmental, and Design for Airport Business Park Development Plan – Phase 1

Oneida County wanted to proceed with the development of the "Triangle Area" to support new development related to UAS testing, manufacturing, research and development (R&D), and other support facilities, as well as other aviation (i.e., aeronautical) and non-aviation uses (i.e., non-aeronautical). Phase 1 work started in June 2021, was completed in September 2021, and included the following:

Existing conditions: provided an overview of the Proposed Project site, infrastructure, history of the property, environmental overview, and regulatory setting/constraints (**Appendix A**, pages A-13 to A-46).

Forecasts and facility requirements review: 2016 AMP forecasts were reviewed to determine whether forecasts and associated facility requirements remain valid, or aviation demand/use has changed based on current operations and based aircraft (**Appendix A**, pages A-47 to A-53).

Land use advisory services: a land use workshop was held to gain familiarity with the market and economic backdrop and determine priorities for future use and specific market opportunities (**Appendix A**, pages A-54 to A-60).

Financial and economic benefits: a high-level economic impact analysis providing estimates of on-site employment, labor income, and economic output to occur in Oneida County was conducted (**Appendix A**, pages A-61 and A-62).

Conceptual site layouts and evaluation: three conceptual site plan alternatives were developed varying the balance of aeronautical versus non-aeronautical uses, concepts were evaluated, and a preferred plan was selected (**Appendix C**).

Conceptual design: high level design of buildings, driveways, parking, accessory structures, utility alignment, turn radii, and building heights was conducted.

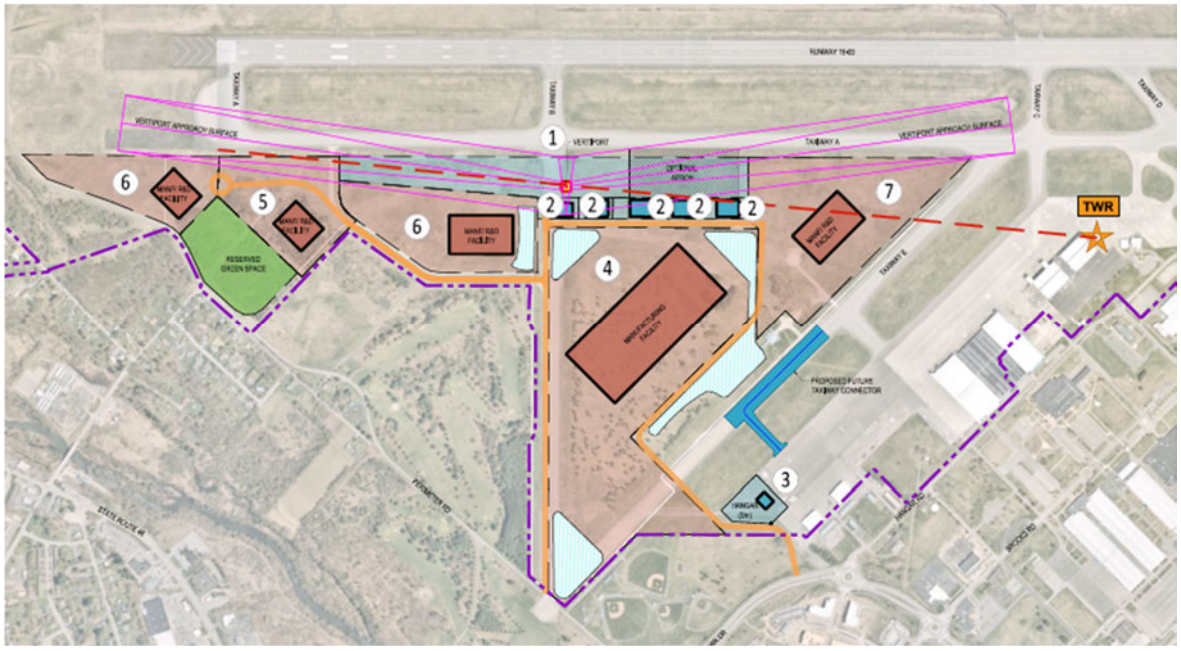
Preliminary funding program: included identifying potential funding partners, concept-level program of milestones and project phasing, and renderings of the preferred alternative.

Key takeaways from Phase 1 work included the following:

- Best use of site is R&D/manufacturing/testing.
- Include larger development (i.e., one 100-acre site, 20–40-acre sites, infill with 5–10-acre sites)
- Desire economic value – job creation and quantity of jobs
- Site flexibility/adaptability to shift between aeronautical and non-aeronautical uses based on demand.
- Concept that maximized non-aeronautical development selected as preferred plan.
- Land release required for areas proposed for non-aeronautical use.
- Potential environmental impacts include archeologically sensitive sites, traffic, noise, threatened and endangered species, potential groundwater and soil contamination related to former fire protection training area, socioeconomic, and natural resources and energy supply.

Figure 1.6 presents the preferred alternative selected as part of the Phase 1 work.

Figure 1.6 - Preferred Airport Business Park Development Plan



Source: C&S Engineers, Inc.

1.2.4 Planning, Environmental, and Design for Airport Business Park Development Plan – Phase 2

Upon completion of Phase 1 work, the proposed Airport Business Park Development Plan proceeded to Phase 2 work. Phase 2 work focuses on the completion of the FAA required environmental and land release documentation, and preliminary site design. The goal will be to have a marketable, shovel-ready site for development. Phase 2 work started in June 2022, is ongoing, and includes the following:

Land release application: a land release from aeronautical uses is required for areas identified for non-aeronautical use within the Airport Business Park Development area.

Environmental Assessment (EA): the EA assesses potential environmental impacts associated with the maximum build out of the Airport Business Park Development Plan and is required as part of the land release application.

Appraisal to determine Fair Market Value (FMV): the FMV and ground lease rate per acre for uses in the Airport Business Park Development Plan limits is required as part of the land release application.

Boundary survey: a boundary survey to identify the limits of non-aeronautical use areas is required as part of the land release application.

Preliminary Design of Utility Corridor (30%): includes coordination with local utility companies to bring service to the Airport Business Park Development Plan limits, conducting a drainage study, developing a draft storm water pollution prevention plan, and preparing preliminary design documents.

1.2.5 Design and Construction – Phase 3

Upon completion of Phase 2 work, the proposed Airport Business Park Development Plan will proceed to Phase 3 work. Phase 3 work includes final design and construction of utilities to the site and building and infrastructure development by private developers or private/public partnerships.

2 Purpose and Need

2.1 Purpose

The purpose of the Proposed Project is to develop a large, unused "Triangle Area" at Griffiss International Airport (RME) with a mix of aeronautical (i.e., aviation) and non-aeronautical (i.e., non-aviation) uses to become more financially self-sustaining by maximizing the revenue potential of land under its ownership for the benefit of the Mohawk Valley region (**Figure 2.1**).

Figure 2.1 - Triangle Area Limits



Source: C&S Engineers, Inc.

2.2 Need

The need for the Proposed Project is to generate airport revenue, promote orderly land use planning, and meet the demand for economic growth.

2.2.1 Generate Airport Revenue

Revenue sources at general aviation airports typically include hangar rentals, ground leases, fuel sales, Fixed Base Operator (FBO) fees, and aircraft tie-down fees. The existing infrastructure at RME is extensive (e.g., 11,820-foot-long x 200-foot-wide runway, 350,000 square yards aircraft parking apron, hangars ranging in size from 28,000 to 400,000 square feet, etc.), and expensive to maintain, and current revenue sources do not offset operating costs. **Table 2.1** shows the operating revenues, expenses, and losses for the past seven years at RME. Operating losses ranged from a low of $3.0 million to a high of $4.6 million. The County's goal is to

Table 2.1 - Operating Revenues, Expenses, and Losses Summary

Item	2017	2018	2019	2020	2021	2022	2023
Rents (Oriskany & Griffiss)	$777,911	$486,356	$558,219	$916,408	$2,005,233	$2,763,992	$2,255,631
Griffiss Payment In Lieu Of Tax Agreements	$0	$0	$0				
Airport Fees	$148,367	$102,624	$37,555	$65,451	$115,544	$171,108	$258,514
Airport Sales and Services Revenue	$0	$0					
Other Miscellaneous Revenues	$51,776	$1,036,677		$88,590	$73,475	$172,000	$146,900
Total Revenue	**$978,054**	**$1,625,657**	**$595,774**	**$1,070,449**	**$2,194,252**	**$3,107,100**	**$2,661,045**
Personnel Services Expenses	$1,374,750	$1,377,141	$1,464,012	$1,328,163	$1,177,653	$1,393,700	$1,571,383
Equipment Expenses	$198,930	$141,255	$90,116	$100,872	$15,967	$141,335	$336,459
Other Expenses	$2,498,768	$2,785,566	$2,605,396	$3,642,345	$3,523,626	$4,237,084	$3,557,788
Employee Benefits	$586,522	$628,040	$672,660	$676,488	$575,036	$613,810	$673,974
Total Expenditures	**$4,658,970**	**$4,932,002**	**$4,832,184**	**$5,747,868**	**$5,292,282**	**$6,385,929**	**$6,139,604**
Net Revenue (Loss)	**($3,680,916)**	**($3,306,345)**	**($4,236,410)**	**($4,677,420)**	**($3,098,030)**	**($3,278,829)**	**($3,478,559`)**

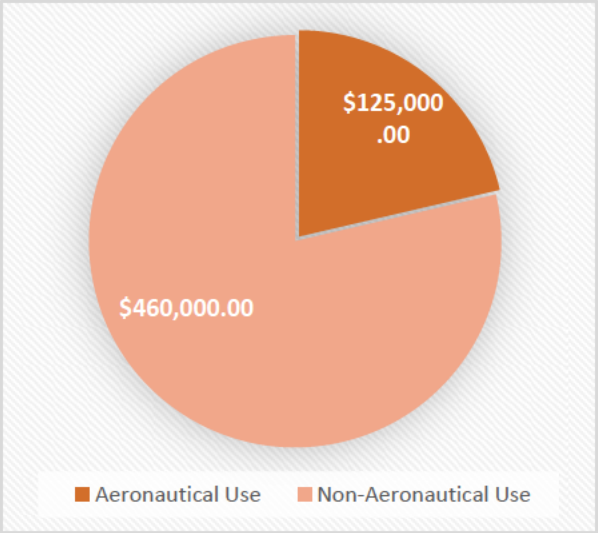
Source: Oneida County

make RME as financially self-sustaining as possible by generating additional revenue.

The County's intent is to lease areas within the "Triangle Area" for aeronautical and non-aeronautical purposes, to generate revenue from tenants who will assume the cost of developing their own facilities. The revenue will be used to construct, improve, and maintain Airport facilities and services while offsetting operating costs.

The Proposed Project has the potential to generate additional land lease rents of $585,000 annually (**Figure 2.2**) at full build out based on a 2022 appraisal valuation of $2,500 per acre (**Appendix B**).

Figure 2.2 - Full Build Out Annual Revenue



Source: C&S Engineers, Inc.

2.2.2 Promote Orderly Land Use Planning

Orderly land use planning at the Airport ensures that surrounding activities are compatible with its purpose of providing aviation services. FAA Advisory Circular 150/5190-4B, *Airport Land Use Compatibility Planning*, states "*the opportunity for increased development, both on and near an airport, can benefit an airport and the local community financially. Likewise, protecting an airport's approaches and complying with design standards provides clear operating areas for aircraft utilizing an airport. Planning for compatible development can provide more opportunities for the efficient development of on-airport property (both aeronautical and non-aeronautical) and expansion of airport facilities. When incompatible uses are developed near airports, the airport may not be able to develop facilities to meet increasing airport user needs or take advantage of beneficial on-airport development*".

Orderly planning also includes local and regional roads that satisfy travel demands to the Airport and surrounding areas. Several roadway improvements have taken place near the Airport including a 1-mile road connecting Route 365 to Perimeter Road and widening of Route 825 to four lanes in the Griffiss Business and Technology Park. The roadways around the Airport must be able to provide an acceptable level of service (LOS) for local and regional traffic volumes when incorporating the Airport Business Park Development Plan needs. Additionally utility needs related to the Proposed Project should be considered to determine if extensions and/or capacity improvements are needed for sewer, electric, gas, and water.

The Proposed Project promotes orderly expansion of development on the Airport, transportation facilities, and public infrastructure, through the development of a comprehensive site layout plan that will be developed in coordination with local, state, and federal agencies.

2.2.3 Meet Demand for Economic Growth

The Airport is part of the Griffiss Business and Technology Park (the Park). The Park has been instrumental in revitalizing the upstate economy. The Park consists of nearly 3,600 acres, has received $800 million in capital investments since its inception, creates $3.7 million in annual taxes, supports over 6,000 jobs with an average Science, Technology, Engineering and Math (STEM) salary of $99,000, and is home to 72 businesses and government agencies.

The County's goal for the Airport is to expand its economic impact to ensure that the community achieves the maximum benefit from the Airport's potential for enhancing economic growth. The Proposed Project site provides the largest developable site remaining in the County, is underutilized or unused, and is not needed for aviation purposes, as indicated in the 2016 Airport Master Plan Update. This land can be

developed without affecting the Airport's long-term ability to achieve its purpose of meeting aviation demand. The Airport Business Park Development Plan will be constructed over a 20-year period in response to market demand. The proposed development efficiently uses the extensive amount of Airport property that is not needed for aviation purposes and supports employment opportunities to meet the needs of the Mohawk Valley region.

3 Alternatives

3.1 Introduction

This section describes the range of alternatives developed as part of the EA to meet the Proposed Project's Purpose and Need. An evaluation was conducted on the alternatives to select the Sponsor's preferred alternative. For alternatives considered but eliminated from further study, the EA will briefly explain why they were eliminated. The no-action alternative will be advanced through the alternatives analysis as a basis of comparison against which the potential impacts of the other alternatives can be evaluated [redacted]

Three preliminary concepts were developed during Phase 1 work completed for the Proposed Project (**Appendix C**, pages C-3 to C-5). The alternative concepts have been incorporated into this section, as Alternatives 2, 3, and 4, with Alternative 1 being added as the No Action alternative.

3.2 Alternatives under Consideration

3.2.1 Alternative 1: No Action

The No Action Alternative is shown on **Figure 3.1**. Land not needed for airport purposes would remain vacant, not allowing for development or additional revenue to offset airport operating costs. Nor would this alternative meet the County's goal to provide economic growth and employment opportunities for the Mohawk Valley region. In fact, making the airport as self-sustaining as possible is required by the FAA as part of its grant assurances. Although this alternative fails to meet the purpose and need of this EA, it serves as the baseline for comparison to the development alternatives.

3.2.2 Alternative 2: Aeronautical-Use Focused Development

This alternative focuses on Aeronautical-Use Focused development. It includes 135.5 acres of aeronautical uses, 137 acres of non-aeronautical uses, 18 hangar or building facilities, associated aircraft parking apron, auto parking, roadways, and utilities.

Key components of this alternative are identified below and depicted on **Figure 3.2**.

- One roadway access point from Perimeter Road
- Reserved greenspace between residential areas and development
- Ten aeronautical use hangars ranging in size from 12,000 SF to 80,000 SF
- Six non-aeronautical use buildings ranging in size from 45,000 SF to 115,000 SF
- Maintenance Repair and Overhaul (MRO) facility
- Vertiport with vertiport hangar

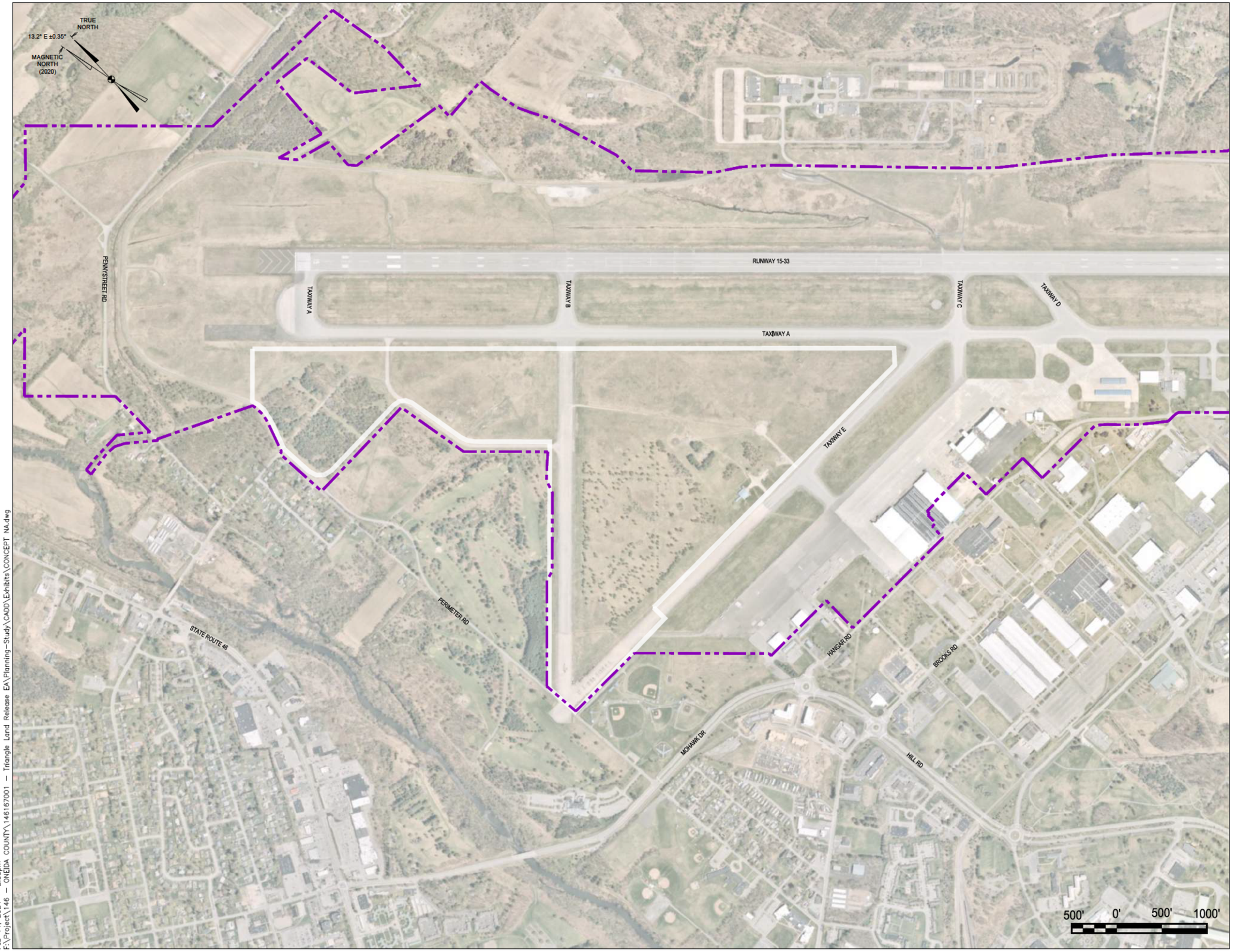


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Figure 3.1

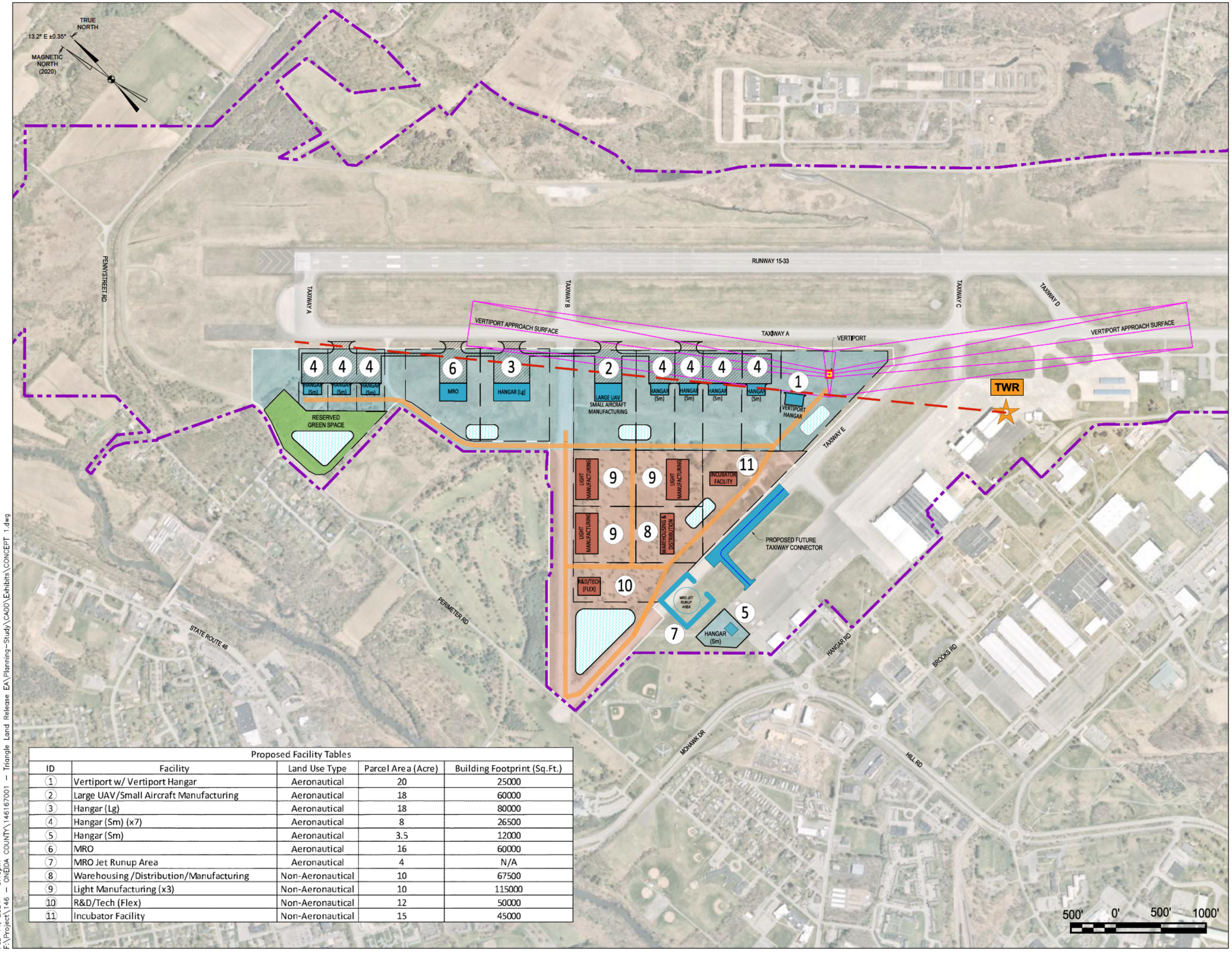
No Action Alternative

- Development Site Area
- Proposed Aeronautical Development
- Proposed Non-aeronautical Development
- Proposed Storm Water Area
- Proposed Access Road Alignment
- Proposed Vertiport Approach Surface
- Existing Airport Property Line

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Source: C&S Engineers Inc.



Proposed Facility Tables				
ID	Facility	Land Use Type	Parcel Area (Acre)	Building Footprint (Sq.Ft.)
1	Vertiport w/ Vertiport Hangar	Aeronautical	20	25000
2	Large UAV/Small Aircraft Manufacturing	Aeronautical	18	60000
3	Hangar (Lg)	Aeronautical	18	80000
4	Hangar (Sm) (x7)	Aeronautical	8	26500
5	Hangar (Sm)	Aeronautical	3.5	12000
6	MRO	Aeronautical	16	60000
7	MRO Jet Runup Area	Aeronautical	4	N/A
8	Warehousing /Distribution/Manufacturing	Non-Aeronautical	10	67500
9	Light Manufacturing (x3)	Non-Aeronautical	10	115000
10	R&D/Tech (Flex)	Non-Aeronautical	12	50000
11	Incubator Facility	Non-Aeronautical	15	45000

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Figure 3.2

Aeronautical-Use Focused Development

- Development Site Area
- ATCT Line of Sight (LOS)
- TWR Air Traffic Control Tower (ATCT)
- Proposed Aeronautical Development
- Proposed Non-aeronautical Development
- Proposed Storm Water Area
- Proposed Access Road Alignment
- Proposed Vertiport Approach Surface
- Existing Airport Property Line

Total Area Per Land Use Type	
Land Use Type	Total Parcel Area (Acre)
Non-Aeronautical	137
Aeronautical	135.5

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Source: C&S Engineers Inc.

3.2.3 Alternative 3: Multi-Use Aeronautical & Non-Aeronautical Development

This alternative focuses on Multi-Use Aeronautical & Non-Aeronautical development. It includes 60.5 acres of aeronautical uses, 191 acres of non-aeronautical uses, 12 hangar or building facilities, associated aircraft parking apron, auto parking, roadways, and utilities.

Key components of this alternative identified below and depicted on **Figure 3.3**.

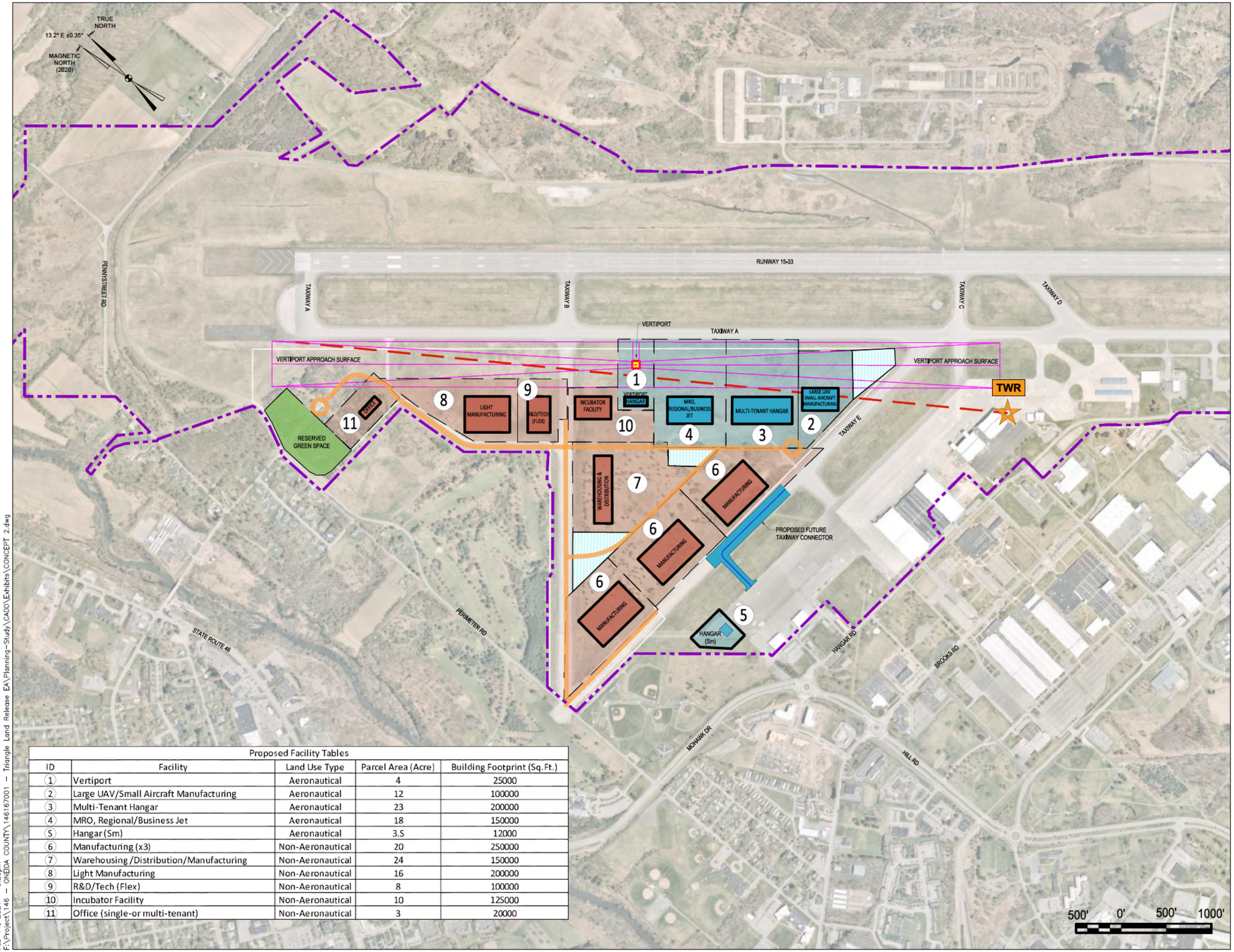
- One roadway access point from Perimeter Road
- Reserved greenspace between residential areas and development
- Three aeronautical use hangars ranging in size from 12,000 SF to 200,000 SF
- Eight non-aeronautical use buildings ranging from 20,000 SF to 250,000 SF
- MRO, regional/business jet facility
- Vertiport

3.2.4 Alternative 4: Maximum Non-Aeronautical Buildout Development

This alternative focuses on Maximum Non-Aeronautical Buildout development. It includes 43.5 acres of aeronautical use, 259 acres of non-aeronautical uses, 11 hangar or building facilities, associated aircraft parking apron, auto parking, roadways, and utilities.

Key components of this alternative identified below and depicted on **Figure 3.4**.

- Two roadway access points from Perimeter Road and Mohawk Drive (Route 825)
- Reserved greenspace between residential areas and development
- Six aeronautical use hangars ranging from 12,000 SF to 25,000 SF
- Five non-aeronautical use buildings ranging from 100,000 SF to 1,000,000 SF
- Vertiport



Proposed Facility Tables				
ID	Facility	Land Use Type	Parcel Area (Acre)	Building Footprint (Sq.Ft.)
1	Vertiport	Aeronautical	4	25000
2	Large UAV/Small Aircraft Manufacturing	Aeronautical	12	100000
3	Multi-Tenant Hangar	Aeronautical	23	200000
4	MRO, Regional/Business Jet	Aeronautical	18	150000
5	Hangar (Sm)	Aeronautical	3.5	12000
6	Manufacturing (x3)	Non-Aeronautical	20	250000
7	Warehousing /Distribution/Manufacturing	Non-Aeronautical	24	150000
8	Light Manufacturing	Non-Aeronautical	16	200000
9	R&D/Tech (Flex)	Non-Aeronautical	8	100000
10	Incubator Facility	Non-Aeronautical	10	125000
11	Office (single-or multi-tenant)	Non-Aeronautical	3	20000

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Figure 3.3

Multi-Use Aero & Non-Aeronautical Development

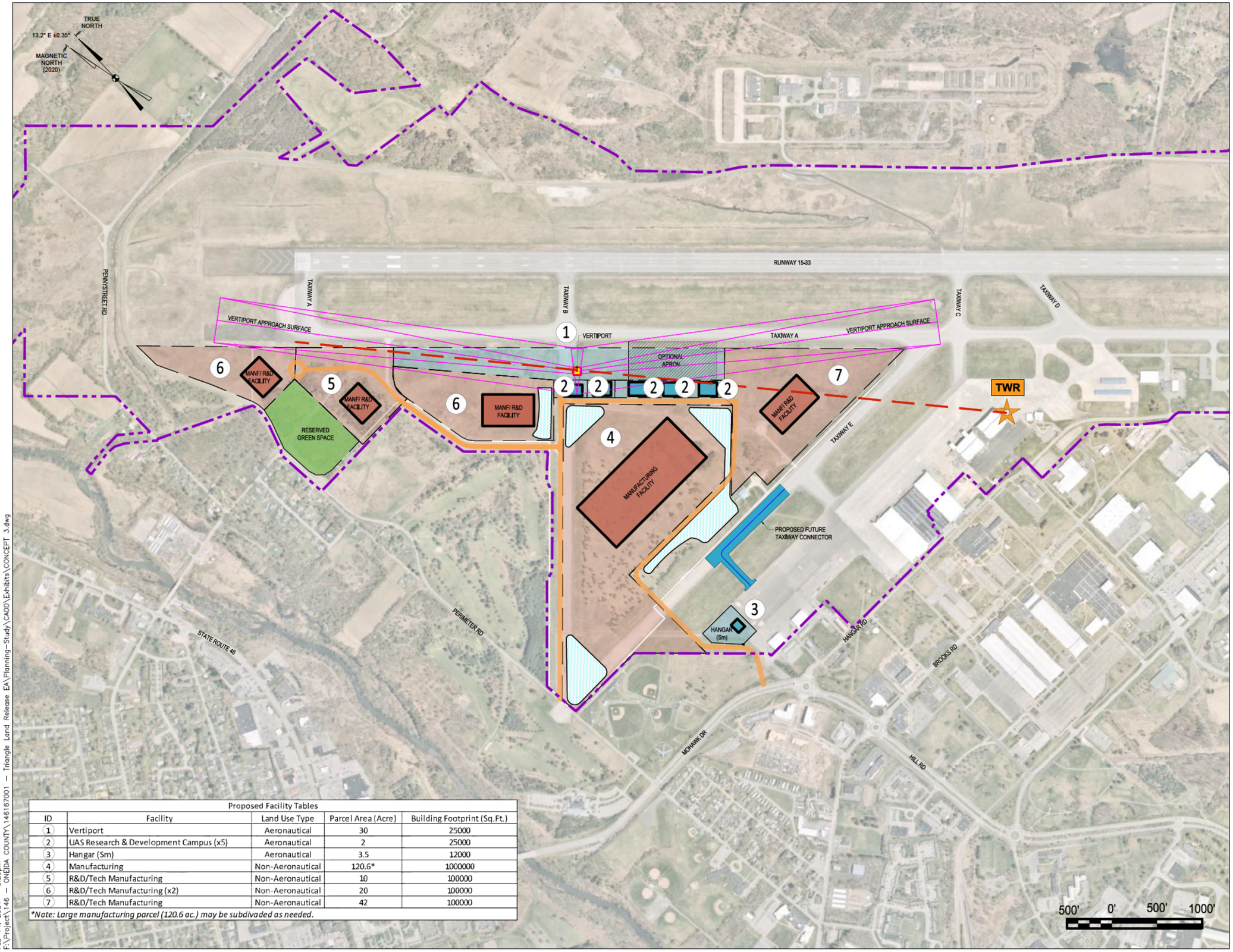
- Development Site Area
- ATCT Line of Sight (LOS)
- TWR Air Traffic Control Tower (ATCT)
- Proposed Aeronautical Development
- Proposed Non-aeronautical Development
- Proposed Storm Water Area
- Proposed Access Road Alignment
- Proposed Vertiport Approach Surface
- Existing Airport Property Line

Total Area Per Land Use Type	
Land Use Type	Total Parcel Area (Acre)
Non-Aeronautical	191
Aeronautical	60.5

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Source: C&S Engineers Inc.



Proposed Facility Tables				
ID	Facility	Land Use Type	Parcel Area (Acre)	Building Footprint (Sq.Ft.)
1	Vertiport	Aeronautical	30	25000
2	UAS Research & Development Campus (x5)	Aeronautical	2	25000
3	Hangar (Sm)	Aeronautical	3.5	12000
4	Manufacturing	Non-Aeronautical	120.6*	1000000
5	R&D/Tech Manufacturing	Non-Aeronautical	10	100000
6	R&D/Tech Manufacturing (x2)	Non-Aeronautical	20	100000
7	R&D/Tech Manufacturing	Non-Aeronautical	42	100000

**Note: Large manufacturing parcel (120.6 ac.) may be subdivaded as needed.*

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C&S COMPANIES®

Figure 3.4

Maximum Non-Aeronautical Buildout Development

- Development Site Area
- ATCT Line of Sight (LOS)
- TWR Air Traffic Control Tower (ATCT)
- Proposed Aeronautical Development
- Proposed Non-aeronautical Development
- Proposed Storm Water Area
- Proposed Access Road Alignment
- Proposed Vertiport Approach Surface
- Existing Airport Property Line

Total Area Per Land Use Type	
Land Use Type	Total Parcel Area (Acre)
Non-Aeronautical	259
Aeronautical	43.5

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Source: C&S Engineers Inc.

3.3 Alternatives Considered and Dismissed

This section includes a brief description of alternatives considered but dismissed because they were deemed impracticable or did not meet the Purpose and Need.

3.3.1 Alternatives Evaluation

The criterion developed by the County to evaluate alternatives for the proposed Airport Business Park, and how the criterion is measured, is presented in **Table 3.1**. **Table 3.2** provides a summary of the alternatives evaluation results.

Table 3.1 - Alternatives Evaluation Criteria

Alternatives Evaluation Criterion	Description	How is it Measured
Meets Purpose and Need	Develop unused airport land to become more financially self-sustaining by maximizing revenue potential of land for benefit of Mohawk Valley region	Meets Purpose and Need gets higher rating, higher revenue potential gets higher rating
Aeronautical vs Non-Aeronautical Area	Note acres for total breakdown of aero vs non-aero uses	More non-aero gets higher rating
Market Support	Does the concept support market needs/desires for area?	Larger parcel sizes get higher ratings
Economic Value (# jobs/quality)	Based on type of use assumed	Rate quality jobs higher than quantity
Revenue Potential	Based on a revenue per acre value	Higher revenue potential gets higher rating
Infrastructure Impacts/Availability	What will the concept require for utility infrastructure?	Least new infrastructure needs or least complicated needs gets higher rating
Site Access	Does access to the site minimize impacts to the surrounding area while providing safe and efficient access to the site?	Least impacts and more efficient access gets higher rating
Environmental Impacts	Are there environmental constraints that may limit development potential, feasibility, and/or costs?	Least potential for impacts (least complicated impacts) gets higher rating
Site Flexibility/Ease of Implementation & Approvals	Will concept allow for phased development, flexibility in implementation, feasible implementation timeline, and simplified/streamlined agency approvals (FAA)?	Highest flexibility/ease of implementation gets higher rating
Rough Order of Magnitude (ROM) Cost	Costs associated with site preparations (utilities, roads, etc.) and known buildings/facilities – not costs for future potential development	Lower costs get a higher rating

Source: C&S Engineers, Inc.

Table 3.2 - Alternatives Evaluation Summary

	Alternative 1	Score[1]	Alternative 2	Score[1]	Alternative 3	Score[1]	Alternative 4	Score[1]
Meets Purpose & Need	No	0	Yes, lower potential revenue	2	Yes, lower potential revenue	2	Yes	3
Non-Aero vs Aero Area (acres)	No development takes place	0	137 vs 135.5 = 272.5	1	191 vs 60.5 = 251.5	2	259 vs 43.5 = 302.5	3
Market Support	Not Applicable, no development	0	Apparent market timing for non-aero opportunity nearer term than aero, other sites on airport that can be filled ahead of this location for aero use	2	Parcels sizes offer lower end of market-indicated site needs and may compete with fee-simple land available for nearer term capture, aeronautical market timing likely longer term than non-aero opportunity, other airport aero sites available	3	Provides large site not available elsewhere in region and sought by target industries, does not compete with other near-by business park sites, favors likely nearer term non-aero opportunities rather than longer term aero development	3
Economic Value[2] (# on-site jobs/quality (average compensation))	No additional jobs or wages	0	1,024 jobs Avg. $77,800	2	2,175 jobs Avg. $73,300	3	1,916 jobs Avg. $78,900	3
Revenue Potential ($3,000 - $7,000 acre/year)	No revenue potential	0	$733,500 - $1,711,500 annually	2	$724,500 - $1,690,500 annually	2	$913,500 - $2,131,500 annually	3
Infrastructure Impacts/Availability	None, no development takes place	0	Utility interconnection similar in all concepts with similar impacts for each concept. Loading/Usage of water, gas and sewer potentially greatest in this concept. Utilities are available in close proximity to Project area with additional capacity to accommodate Proposed Project.	2	Utility interconnection similar in all concepts with similar impacts for each concept. Loading/Usage of water, gas and sewer less in this concept. Utilities are available in close proximity to Project area with additional capacity to accommodate Proposed Project.	2	Utility interconnection similar in all concepts with similar impacts for each concept. Loading/Usage of water, gas and sewer the least in this concept. Utilities are available in close proximity to Project area with additional capacity to accommodate Proposed Project.	2
Site Access	No change	0	Access to entire site from one intersection on Perimeter Road	2	Access to entire site from one intersection on Perimeter Road	2	Separates truck traffic for large facility from auto traffic, but increases costs for acquisition/construction	2
Environmental Impacts[3]	None	3	SHPO - Largest development impact (48 AC), highest impact to T&E species, moderate impact to contaminated sites	1	SHPO - Lowest development impact (38.2 AC), moderate impact to T&E species, least impact to contaminated sites	3	SHPO - Moderate development impact (40.8 AC), least impacts to T&E species, highest impact to contaminated sites	2
Site Flexibility/Ease of Implementation & Approvals	Not Applicable, no development	0	Most LF of road construction, no land acquisition, requires most new access road to vertiport (initial phase), highest amount of aero use – longer timeframe to implement with federal funding & justification, approvals same for all alternatives, need phased approach to address/mitigate environmental impacts (NPL sites/solar farm, PFAS site in triangle)	1	Lowest LF of new road construction, no land acquisition, requires some new access road to vertiport (initial phase), moderate non-aero use – shorter timeframe to implement with private funding, approvals same for all alternatives, need phased approach to address/mitigate environmental impacts (NPL sites/solar farm, PFAS site in triangle)	2	Moderate LF of new road construction, requires land acquisition, does not require new access road to vertiport, highest non aero use – shorter timeframe to implement with private funding, approvals same for all alternatives, need phased approach to address/mitigate environmental impacts (NPL sites/solar farm, PFAS site in triangle)	3
ROM Cost[3]	$0	3	$20.6 M	2	$20.7 M	2	$21.0 M	2
Total (Higher score is higher ranked option)		6		17		23		26

Note 1 Score 0, Impact: no benefits and/or all impacts negative, Score 1, Impact: few benefit/most impacts negative/highest overall environmental impacts, Score 2, Impact: various benefits/most impacts positive/moderate overall environmental impacts, Score 3, Impact: highest benefits/all impacts positive/lowest overall environmental impacts
Note 2 See Appendix C, Alternatives Documentation, page C-31
Note 3 See Appendix C, Alternatives Documentation, pages C-9 to C-22, pages C-34 to C-37
Source: C&S Engineers, Inc.

3.3.2 Alternatives Removed from Further Consideration

Based on the evaluation, Alternatives 2 and 3 were removed from further consideration.

Alternative Concept 2 was dismissed for the following reasons:

- Does not maximize non-aeronautical development on site (137 acres versus 191 acres for Alternative 3 and 259 acres for Alternative 4)
- Additional areas on Airport to accommodate aeronautical uses (95 acres, **Appendix A**, pages A-51 to A-53)
- Generates least number of jobs (1,024 versus 2,175 for Alternative 3 and 1,916 for Alternative 4)
- Non-aeronautical use parcels are small and would likely compete with other sites nearby for
- development opportunities
- Only one access road, overlapping truck and automobile traffic could affect traffic congestion and levels.
- of service to the site and nearby areas
- Highest potential for environmental impacts (**Appendix C**, pages C-15 to C-22)

Alternative Concept 3 was dismissed for the following reasons:

- Does not maximize non-aeronautical development on site (191 acres for Alternative 3 versus 259 acres for Alternative 4)
- Additional areas on Airport to accommodate aeronautical uses (95 acres, **Appendix A,** pages A-51 to A-53)
- Non-aeronautical use parcels are small and would likely compete with other sites nearby for
- development opportunities
- Only one access road, overlapping truck and automobile traffic could affect traffic congestion and levels of service to the site and nearby areas
- Least amount of revenue potential and lowest average wage compensation for new jobs ($1.7 million/$73,300 versus $1.7 million/$77,800 for Alternative 2 and $2.1 million/$78,900 for Alternative 4)

3.4 Preferred Alternative

Based on the evaluation contained in this section, Alternative 4 was selected as the "Preferred Alternative" (i.e., Proposed Project). Alternative 4 ranked highest and was selected by County Stakeholders as the preferred alternative (i.e., Proposed Project) for the following reasons:

- Provides large manufacturing and/or manufacturing/R&D sites to promote economic growth and accommodate demand in the region.
- Provides two access roads to the site that separate truck traffic from automobile traffic.
- Uses existing pavement for the proposed ground-based vertiport.
- Generates highest revenue and job compensation ($2.1 million/$78,900 versus $1.7 million/$73,300 for Alternative 3 and $1.7 million/$77,800 for Alternative 2)
- Maximizes non-aeronautical development on site (259 acres versus 137 acres for Alternative 2 and 191 acres for Alternative 3)
- Meets the Purpose and Need to enable the Airport to become more financially self-sustaining by maximizing the revenue potential of land under its ownership for the benefit of the Mohawk Valley region.

After selection of the preferred alternative, further refinements took place based on preliminary design for utility corridors, completion of a drainage study, and potential environmental impacts. Modifications included the following:

- Location and size of stormwater management areas
- Proposed green space reduced to provide an additional 8-acre-manufacturing site.

- Addition of large aeronautical use hangar adjacent to existing apron with associated apron and automobile parking
- Addition of off-airport utility corridors
- Addition of paved areas (roads, sidewalks, curbs, auto parking, aircraft parking apron)
- Site access modified to include one access road to site, one separate access road to large aeronautical use area.
- 20-acre manufacturing site (#6) removed from development plan due to potential for soil contamination (PFAS) and need for environmental cleanup
- Five-acre small aeronautical use hangar areas adjacent to taxiway reduced to four hangar areas to avoid an archeologically sensitive site.
- Vertiport and associated approach surfaces removed.
- Addition of a traffic roundabout at intersection of Perimeter Road and Mohawk Drive (Route 825)
- Addition of a noise barrier adjacent to Mohawk Drive (Route 825)

Key components of final preferred plan (i.e., Proposed Project) are depicted on **Figure 3.5**, and summarized below. The Proposed Project consists of the following elements:

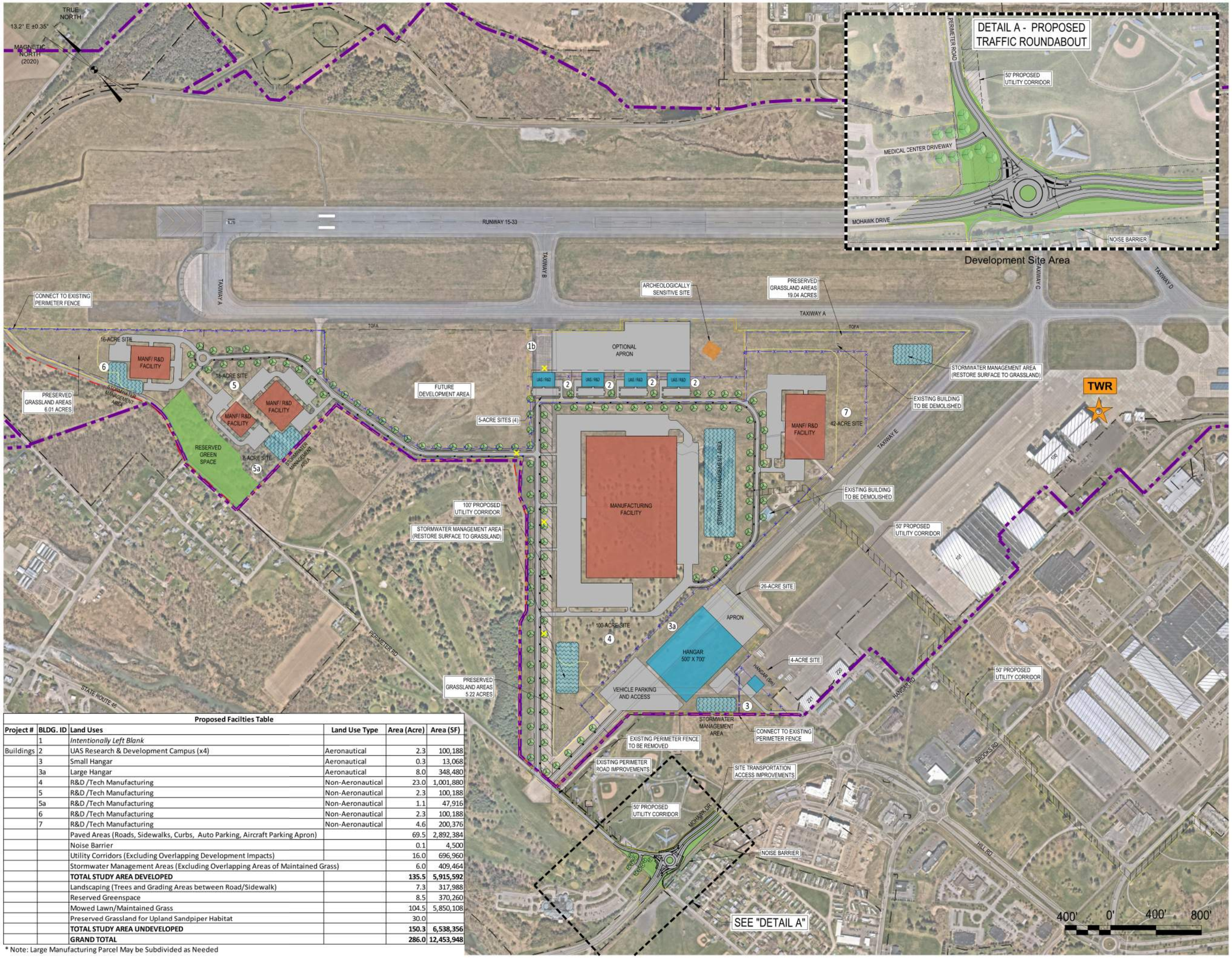
- Excavating/grading of approximately 135.5 acres of land that includes:
  - New building construction (43.9 acres: 33.3 acres non-aeronautical buildings and 10.6 acres of aeronautical buildings)
  - Installation of utility corridors to connect to public systems (i.e., water, sewer, electric, gas)
  - Installation of five stormwater management areas
  - Construction of paved roads and automobile parking areas, and installation of transportation infrastructure (i.e., access roads, sidewalks, curbs, street lighting, etc.)
  - Construction of traffic roundabout
  - Construction of aircraft parking apron
  - Construction of noise barrier
  - Landscaping (i.e., installing irrigation, plantings, etc.)
  - Installation of new perimeter fence (12,035 linear feet) and removal of existing perimeter fence (11,163 linear fence)
- Reserved greenspace (8.5 acres)
- Removal of 17.5 acres of trees and 340 individual trees
- Demolition of two buildings
  - Building 222 (former Hush House Building 5771) [2]
  - Tactical Air Navigation System (TACAN) electrical building
- Development of 187-acre upland sandpiper mitigation site
- Land acquisition or property transfer (**Figure 3.6**)
  - Fee simple for traffic roundabout, 0.05 acres (tax parcel 224.000-1-1)
  - Utility corridor easements, 4.39 acres (tax parcels 243.000-1-1.6, 243.000-1-1.11, 243.000-1-1.33, 243.000-1-1.29 and 243.000-1-1.35)
  - Temporary construction easements for road improvements and traffic roundabout, 0.25 acres (tax parcel 224.000-1-1)
  - Property transfer to NYS for traffic roundabout, 0.89 acres (tax parcel 224.000-1-4.1)
  - Property transfer to City of Rome for utility corridor (sewer), 0.75 acres (tax parcel 224.000-1-4.1)

[2] A Hush House is a term used for an enclosed, noise suppressed, aircraft engine test facility

3.5 Time Frame for Proposed Project

The following time frames are anticipated for completing the Proposed Project:

- 2024: Land acquisition
- 2024-2025: Proposed Project design and permitting for utilities, road improvements and traffic roundabout, and site access roads/airport fencing
- 2025-2026: Construction of utility extensions to site
- 2025-2028: GUSC: Phase 1 full duct bank, switch gear, distribution feeders to provide 20 MW
- 2028-2029: GUSC Phase 2 additional distribution feeders and switch gears to provide an additional 30 MW
- 2026-2027: Construction of road improvements and traffic roundabout
- 2026-2027: Construction of site access roads/airport fencing
- 2029: On-site construction begins



Proposed Facilties Table					
Project #	BLDG. ID	Land Uses	Land Use Type	Area (Acre)	Area (SF)
	1	*Intentionally Left Blank*			
Buildings	2	UAS Research & Development Campus (x4)	Aeronautical	2.3	100,188
	3	Small Hangar	Aeronautical	0.3	13,068
	3a	Large Hangar	Aeronautical	8.0	348,480
	4	R&D /Tech Manufacturing	Non-Aeronautical	23.0	1,001,880
	5	R&D /Tech Manufacturing	Non-Aeronautical	2.3	100,188
	5a	R&D /Tech Manufacturing	Non-Aeronautical	1.1	47,916
	6	R&D /Tech Manufacturing	Non-Aeronautical	2.3	100,188
	7	R&D /Tech Manufacturing	Non-Aeronautical	4.6	200,376
		Paved Areas (Roads, Sidewalks, Curbs, Auto Parking, Aircraft Parking Apron)		69.5	2,892,384
		Noise Barrier		0.1	4,500
		Utility Corridors (Excluding Overlapping Development Impacts)		16.0	696,960
		Stormwater Management Areas (Excluding Overlapping Areas of Maintained Grass)		6.0	409,464
		TOTAL STUDY AREA DEVELOPED		**135.5**	**5,915,592**
		Landscaping (Trees and Grading Areas between Road/Sidewalk)		7.3	317,988
		Reserved Greenspace		8.5	370,260
		Mowed Lawn/Maintained Grass		104.5	5,850,108
		Preserved Grassland for Upland Sandpiper Habitat		30.0	
		TOTAL STUDY AREA UNDEVELOPED		**150.3**	**6,538,356**
		GRAND TOTAL		**286.0**	**12,453,948**

* Note: Large Manufacturing Parcel May be Subdivided as Needed

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Figure 3.5

Preferred Alternative

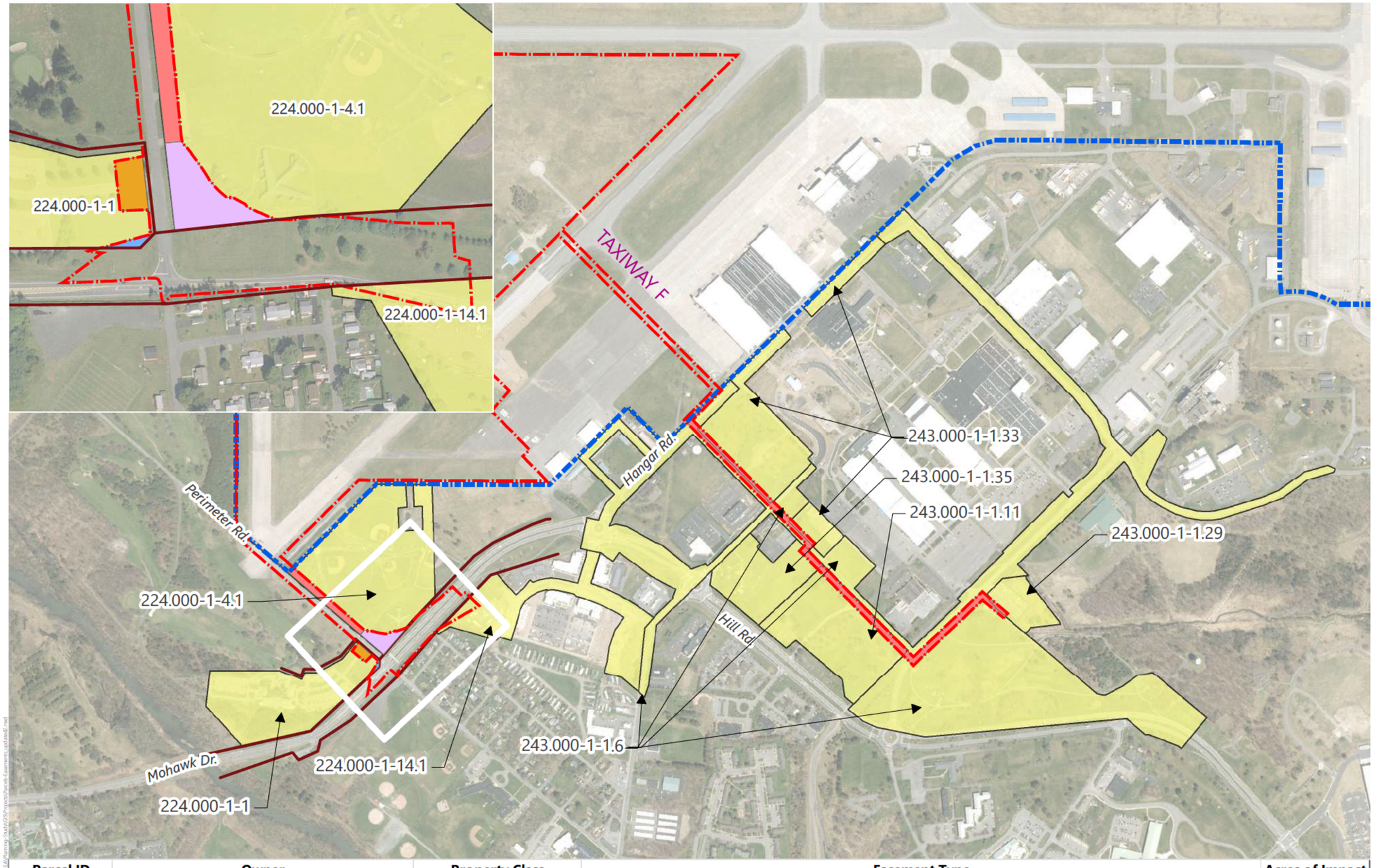
- Development Site Area
- Air Traffic Control Tower (ATCT)
- Proposed Project/Construction Limits
- Proposed Aeronautical Development
- Proposed Non-Aeronautical Development
- Proposed Storm Water Area
- Preserved Grassland Area
- Proposed Utility Corridor
- Proposed Pavement (Access roads, sidewalks, curbs, automobile parking areas, aircraft parking apron)
- Aeronautical Use Area
- Non-Aeronautical Use Area
- Existing Airport Property Line
- Proposed Noise Barrier
- Existing Perimeter Fence
- Existing Perimeter Fence To Be Removed
- Proposed Perimeter Fence Line
- Proposed Tree
- Proposed Street Light

Total Area Per Land Use Type	
Land Use Type	Total Parcel Area (Acre)
Non-Aeronautical	211
Aeronautical	50
Other (Utilities Corridors, Traffic Roundabout, Environmentally Sensitive)	25

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Source: C&S Engineers Inc.



Parcel ID	Owner	Property Class	Easement Type	Acres of Impact
224.000-1-1	Mohawk Glen Associates LLC	642 - Health Bldg.	Fee Simple Acquisition by County - To be Transferred to City of Rome	0.05
			Temporary Construction Easement	0.25
224.000-1-4.1	County of Oneida	330 - Vacant Commercial	County Owned - To be Transferred to City of Rome for Utility Corridor (Sewer)	0.75
			County Owned - To be Transferred to City of Rome for Traffic Roundabout	0.89
243.000-1-1.11	Oneida County Industrial Development Agency	330 - Vacant Commercial	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	1.10
243.000-1-1.29	Griffiss Utility Services Corporation	872 - Electric/Substation	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	0.11
243.000-1-1.33	Oneida County Industrial Development Agency	652 - Govt. Bldg.	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	0.65
243.000-1-1.35	Cardinal Griffiss Realty LLC	464 - Office Bldg.	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	0.25
243.000-1-1.6	Oneida County Industrial Development Agency	331 - Vacant Commercial	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	2.28

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Figure 3.6

Preferred Alternative Land Acquisition

- Proposed Project/Construction Limits
- Airport Property
- 2023 Oneida County Tax Parcels
- Impacted Tax Parcels
- Fee Simple Acquisition
- Temporary Construction Easement
- Property Transfer (Oneida County to NYS for Traffic Roundabout)
- Utility Corridor Easement
- Updated Property Lines

N

0 400 800 1,600 Feet

1 in. = 800 ft.
When printed at 11 in. by 17 in.

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Note 1: Parcels 224.000-1-4.1 & 243.000-1-1.6 have been clipped to only show their location off-airport property.
Note 2: For parcels with multiple features (224.000-1-4. & 243.000-1-1.11), only the impacted feature part is shown on the map.
Note 3: Parcel lines updated to reflect NYS fee simple acquisition associated with NYSDOT Route 825 Griffiss & Business Technology Park (Phase III) Plans, Specifications, and Estimate Submission drawings dated April 2016 (Parcels 224.000-1-4.1, 224.000-1-1, & 224.000-1-14.1).
Sources: ESRI World Imagery Basemap; Tax Parcels from Oneida County February 2024
Created by C&S Engineers, Inc., 2024

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4 Affected Environment, Environmental Consequences, and Mitigation

Introduction

This section evaluates potential impacts related to the Proposed Project on each of the Environmental Impact Categories defined by FAA Order 1050.1F.

- Air Quality
- Climate
- Biological Resources
- Water Resources
- Coastal Resources
- Historic, Architectural, Archeological, and Cultural Resources
- Department of Transportation Act, Section 4(f)
- Farmlands
- Hazardous Materials, Solid Waste, and Pollution Prevention
- Land Use
- Visual Effects
- Natural Resources and Energy Supply
- Noise and Noise-Compatible Land Use
- Socioeconomics, [redacted] Children's Environmental Health and Safety Risks
- Cumulative Impacts

The evaluation of each Environmental Impact Category includes the following:

Affected Environment describes the existing conditions[3] within the areas affected by the Proposed Project. Baseline data used to determine the affected environment (existing conditions) included reviewing existing documentation and databases, consulting with various individuals and agencies, and conducting field investigations. The Proposed Project consists of Project areas located on Airport property (i.e., Business Park Development Area) and off Airport property (i.e., associated utility corridors, noise barrier, and roadway improvements). These areas are collectively referred to as "the Project area".

Environmental Consequences provides a concise analysis of the potential environmental, social, and economic impacts the No Action and Proposed Project may result in, following the guidance provided in the 1050.1F, *Desk Reference*. For comparison, the No Action Alternative is evaluated alongside the Proposed Project. Although the No Action Alternative does not address or meet the Purpose and Need as explained in **Section 2**, NEPA and CEQ regulations require evaluation of a No Action Alternative. When compared with the Proposed Project, the No Action Alternative serves as a reference point.

In accordance with FAA Orders 1050.1F and 5050.4B, the environmental impacts resulting from construction activities must be assessed when preparing an EA. Therefore, construction activities required for development of the proposed action were evaluated to determine potential temporary construction-related impacts. Short-term construction impacts generally include soil erosion, water quality, stormwater runoff, air quality, and noise. Mitigation measures to address stormwater runoff and to minimize air and noise impacts are addressed in the applicable environmental resource sections of this chapter. For example, as detailed in

[3] Existing conditions, or affected environment, are the baseline conditions that may be affected by the alternatives.

Section 4.1 (Air Quality), to evaluate temporary construction-related impacts to air quality, a construction emissions inventory was conducted for all components of the Proposed Project, including off-site mitigation construction activities. **Section 4.1** also discusses recommended best management practices (BMPs) to reduce construction-related impacts (i.e., instituting dust control measures, such as watering and stabilizing wind erodible soil as soon as practical after disturbance)

Mitigation Measures identifies conceptual measures to mitigate potential impacts related to the Proposed Project. As defined in CEQ Regulations at 40 CFR 1508.20, mitigation includes avoiding impacts; minimizing impacts; rectifying the impact by repairing, rehabilitating, or restoring the environment; reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and compensating for the impact by replacing or providing substitute resources.

Coordination occurred between the County and property owners as well as federal, state, county, and local agencies throughout the project to discuss impacts to the various NEPA categories. Mitigation measures resulting from coordination are included in the applicable environmental resource sections. Details regarding coordination and resulting mitigation measures are provided in **Appendix D** (Agency Coordination), **Appendix F** (Biological Resources) and **Appendix Q** (Public Involvement).

Significance Threshold and Conclusions describes the significance threshold and/or significance factors for each environmental resource as identified in FAA 1050.1F, *Desk Reference*, Exhibit 4-1, and Table 7-1 of FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, to determine if thresholds are exceeded and preparation of an Environmental Impact Statement is warranted.

Proposed Project Description

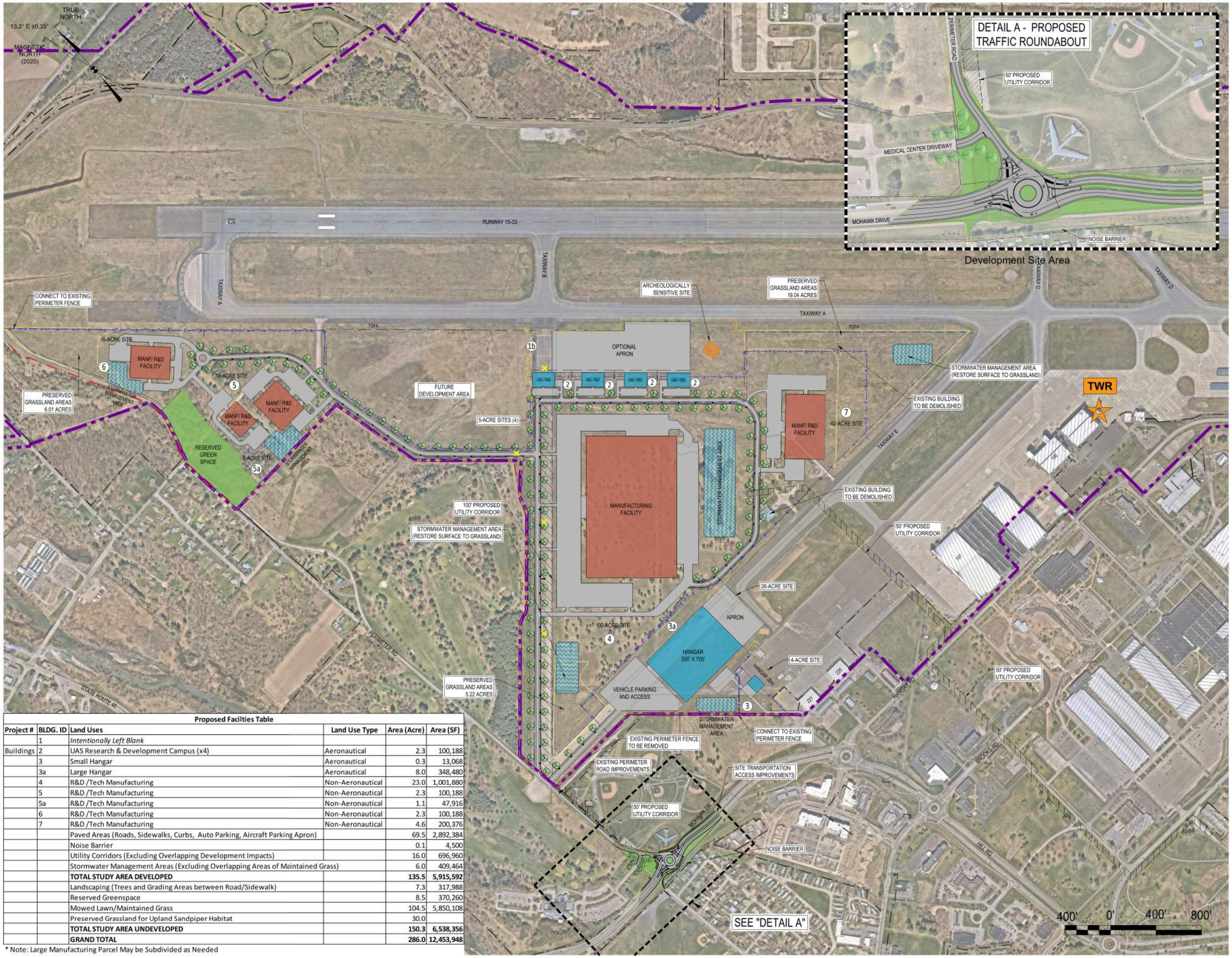
Development of the Proposed Project is envisioned as a long-term process that is dependent on market response. This EA evaluates impacts related to the maximum build out of the Airport Business Park. The County's goal is to obtain all necessary environmental clearances for a shovel ready site for development. It should be noted that impacts were evaluated based on a conceptual development plan and preliminary design conducted for extending utilities to the site, roadway improvements (i.e., traffic roundabout and realignment of Perimeter Road), and site access roads (**Appendix P**). Specific tenants have not been identified at this time. Key components of the Proposed Project are depicted on **Figure 4.1**, and summarized below:

- Excavating/grading of approximately 135.5 acres of land that includes:
  - New building construction (43.9 acres: 33.3 acres non-aeronautical buildings and 10.6 acres of aeronautical buildings)
  - Installation of utility corridors to connect to public systems (i.e., water, sewer, electric, gas)
  - Installation of five stormwater management areas
  - Construction of paved roads and automobile parking areas, and installation of transportation infrastructure (i.e., access roads, sidewalks, curbs, street lighting, etc.)
  - Construction of traffic roundabout
  - Construction of aircraft parking apron
  - Construction of noise barrier
  - Landscaping (i.e., installing irrigation, plantings, etc.)
  - Installation of new perimeter fence (12,035 linear feet) and removal of existing perimeter fence (11,163 linear fence)
- Reserved greenspace (8.5 acres)
- Removal of 17.5 acres of trees and 340 individual trees
- Demolition of two buildings

- Building 222 (former Hush House Building 5771) [4]
- Tactical Air Navigation System (TACAN) electrical building

- Development of 187-acre upland sandpiper mitigation site
- Land acquisition or property transfer (**Figure 4.2**)
  - Fee simple for traffic roundabout, 0.05 acres (tax parcel 224.000-1-1)
  - Utility corridor easements, 4.39 acres (tax parcels 243.000-1-1.6, 243.000-1-1.11, 243.000-1-1.33, 243.000-1-1.29 and 243.000-1-1.35)
  - Temporary construction easements for road improvements and traffic roundabout, 0.25 acres (tax parcel 224.000-1-1)
  - Property transfer to NYS for traffic roundabout, 0.89 acres (tax parcel 224.000-1-4.1)
  - Property transfer to City of Rome for utility corridor (sewer), 0.75 acres (tax parcel 224.000-1-4.1)

[4] A Hush House is a term used for an enclosed, noise suppressed, aircraft engine test facility



Proposed Facilties Table

Project #	BLDG. ID	Land Uses	Land Use Type	Area (Acre)	Area (SF)
	1	*Intentionally Left Blank*			
Buildings	2	UAS Research & Development Campus (x4)	Aeronautical	2.3	100,188
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	3a	Large Hangar	Aeronautical	8.0	348,480
	4	R&D /Tech Manufacturing	Non-Aeronautical	23.0	1,001,880
	5	R&D /Tech Manufacturing	Non-Aeronautical	2.3	100,188
	5a	R&D /Tech Manufacturing	Non-Aeronautical	1.1	47,916
	6	R&D /Tech Manufacturing	Non-Aeronautical	2.3	100,188
	7	R&D /Tech Manufacturing	Non-Aeronautical	4.6	200,376
		Paved Areas (Roads, Sidewalks, Curbs, Auto Parking, Aircraft Parking Apron)		69.5	2,892,384
		Noise Barrier		0.1	4,500
		Utility Corridors (Excluding Overlapping Development Impacts)		16.0	696,960
		Stormwater Management Areas (Excluding Overlapping Areas of Maintained Grass)		6.0	409,464
		TOTAL STUDY AREA DEVELOPED		**135.5**	**5,915,592**
		Landscaping (Trees and Grading Areas between Road/Sidewalk)		7.3	317,988
		Reserved Greenspace		8.5	370,260
		Mowed Lawn/Maintained Grass		104.5	5,850,108
		Preserved Grassland for Upland Sandpiper Habitat		30.0	
		TOTAL STUDY AREA UNDEVELOPED		**150.3**	**6,538,356**
		GRAND TOTAL		**286.0**	**12,453,948**

* Note: Large Manufacturing Parcel May be Subdivided as Needed

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Figure 4.1

Proposed Project

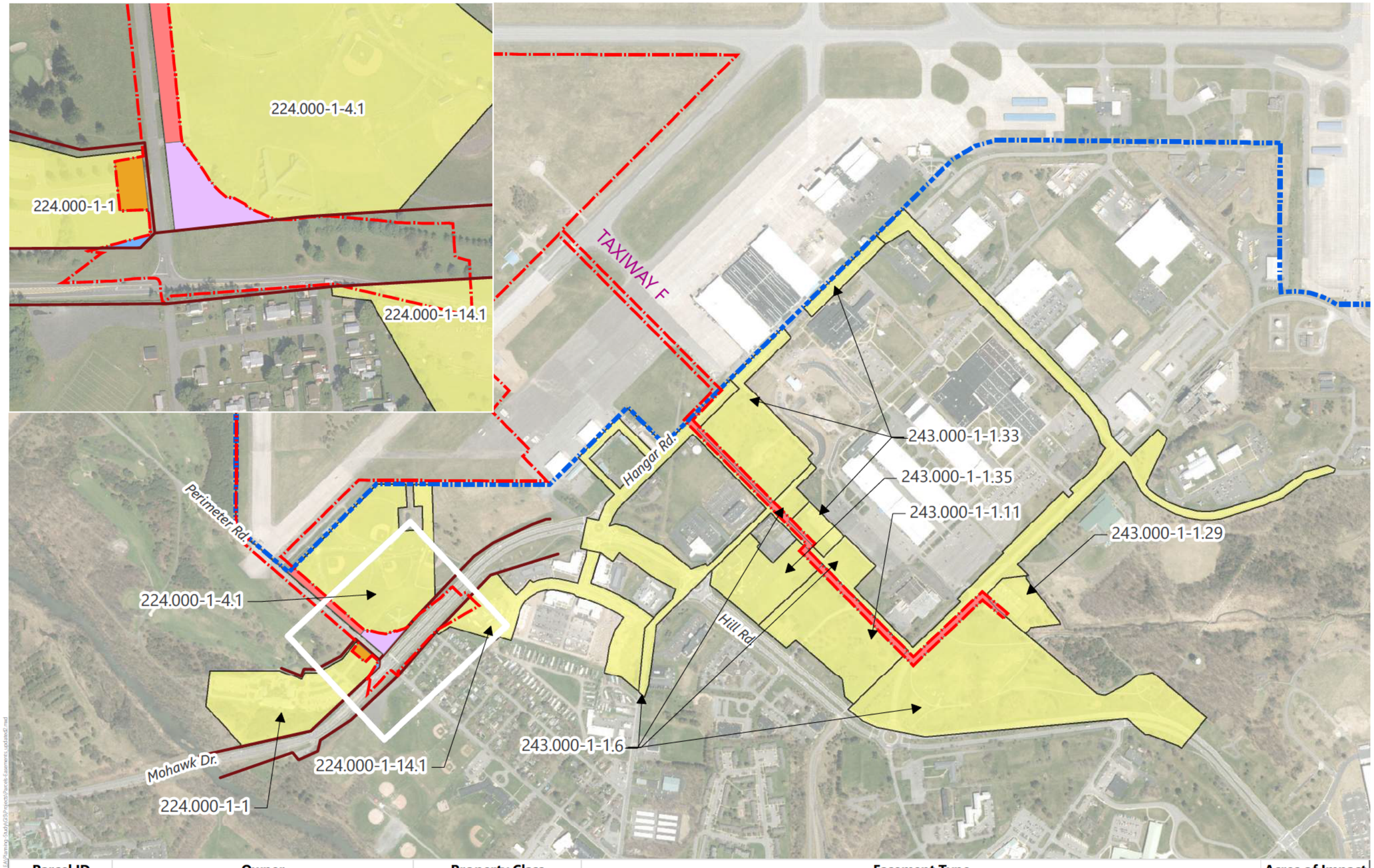
- Development Site Area
- Air Traffic Control Tower (ATCT)
- Proposed Project/Construction Limits
- Proposed Aeronautical Development
- Proposed Non-Aeronautical Development
- Proposed Storm Water Area
- Preserved Grassland Area
- Proposed Utility Corridor
- Proposed Pavement (Access roads, sidewalks, curbs, automobile parking areas, aircraft parking apron)
- Aeronautical Use Area
- Non-Aeronautical Use Area
- Existing Airport Property Line
- Proposed Noise Barrier
- Existing Perimeter Fence
- Existing Perimeter Fence To Be Removed
- Proposed Perimeter Fence Line
- Proposed Tree
- Proposed Street Light

Total Area Per Land Use Type	
Land Use Type	Total Parcel Area (Acre)
Non-Aeronautical	211
Aeronautical	50
Other (Utilities Corridors, Traffic Roundabout, Environmentally Sensitive)	25

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Source: C&S Engineers Inc.



Parcel ID	Owner	Property Class	Easement Type	Acres of Impact
224.000-1-1	Mohawk Glen Associates LLC	642 - Health Bldg.	Fee Simple Acquisition by County - To be Transferred to City of Rome	0.05
			Temporary Construction Easement	0.25
224.000-1-4.1	County of Oneida	330 - Vacant Commercial	County Owned - To be Transferred to City of Rome for Utility Corridor (Sewer)	0.75
			County Owned - To be Transferred to City of Rome for Traffic Roundabout	0.89
243.000-1-1.11	Oneida County Industrial Development Agency	330 - Vacant Commercial	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	1.10
243.000-1-1.29	Griffiss Utility Services Corporation	872 - Electric/Substation	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	0.11
243.000-1-1.33	Oneida County Industrial Development Agency	652 - Govt. Bldg.	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	0.65
243.000-1-1.35	Cardinal Griffiss Realty LLC	464 - Office Bldg.	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	0.25
243.000-1-1.6	Oneida County Industrial Development Agency	331 - Vacant Commercial	Utility Corridor Easement Acquisition by County - To be Transferred to Local Utility Providers (Electric & Gas)	2.28

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Figure 4.2

Proposed Project Land Acquisition

- Proposed Project/Construction Limits
- Airport Property
- 2023 Oneida County Tax Parcels
- Impacted Tax Parcels
- Fee Simple Acquisition
- Temporary Construction Easement
- Property Transfer (Oneida County to NYS for Traffic Roundabout)
- Utility Corridor Easement
- Updated Property Lines

N

0 400 800 1,600 Feet

1 in. = 800 ft.
When printed at 11 in. by 17 in.

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Note 1: Parcels 224.000-1-4.1 & 243.000-1-1.6 have been clipped to only show their location off-airport property.
Note 2: For parcels with multiple features (224.000-1-4. & 243.000-1-1.11), only the impacted feature part is shown on the map.
Note 3: Parcel lines updated to reflect NYS fee simple acquisition associated with NYSDOT Route 825 Griffiss & Business Technology Park (Phase III) Plans, Specifications, and Estimate Submission drawings dated April 2016 (Parcels 224.000-1-4.1, 224.000-1-1, & 224.000-1-14.1).
Sources: ESRI World Imagery Basemap; Tax Parcels from Oneida County February 2024
Created by C&S Engineers, Inc., 2024

Document Path: G:\Projects\164_GRIFFISS\164_GRIFFISS_0000_Transfer Land Release EA\Planning Study\GIS\Projects\Parcels_Easements_updated.mxd

4.1 Air Quality

Under the Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) regulates six common air pollutants, referred to as "criteria pollutants", by comparing the concentration of pollutant levels in outdoor ambient air to established National Ambient Air Quality Standards (NAAQS). These criteria air pollutants are carbon monoxide (CO), nitrogen dioxide (NO2), ozone (O3), particulate matter (PM), sulfur dioxide (SO2), and lead (Pb).[5] The EPA determined that these criteria air pollutants may harm human health and the environment, and cause property damage. An area with measured pollutant concentrations that are below the NAAQS is designated as "attainment", and an area with pollutant concentrations that exceed the NAAQS is designated as "nonattainment". After air pollutant concentrations in a nonattainment area are reduced to levels below the NAAQS, the EPA re-designates the area to be "maintenance"— a designation that is maintained for a period of 20 years.

Additionally, the CAA requires federal agencies such as the FAA to ensure that any actions not occurring in an area in attainment with NAAQS "conform" to the appropriate State Implementation Plan (SIP). The SIPs' purpose is to eliminate or reduce the severity and number of violations of the NAAQS and achieve expeditious attainment of such standards. Under the General Conformity Rule, project-related emissions of the applicable nonattainment/maintenance pollutants are compared to *de minimis* level thresholds. If the emissions exceed the thresholds, a formal Conformity Determination is required to demonstrate that the action conforms to the applicable SIP.

4.1.1 Affected Environment

National Ambient Air Quality Standards

According to the USEPA Green Book[6], (current as of February 29, 2024), Oneida County is in attainment for all criteria pollutants. Since the Proposed Project would cause an increase in emissions, the FAA Air Quality Handbook requires completion of an emissions inventory.

An Air Quality and Climate Analysis was completed by HMMH in February 2024 to quantify air quality emissions associated with stationary sources (i.e. heaters), ground access vehicle trips, and construction activities and determine whether the Proposed Project would have the potential to exceed EPA *de minimis* thresholds (**Appendix E**, pages E-1 to E-13**)**. The Proposed Project is not anticipated to increase the number of aircraft operations or change the fleet mix/taxi times, compared to the No Action. Therefore, aircraft and associated ancillary activities were not evaluated for the air quality analysis.

General Conformity

Because the RME area is designated as attainment for all criteria pollutants, the US EPA General Conformity Rule does not apply to this Proposed Project. However, the construction and net change in air emissions was still compared to the applicable US EPA *de minimis* levels for determining significant impacts for the purposes of NEPA. New York State is located within the Ozone Transportation Region (OTR) and as such is regulated as if in nonattainment for ozone. Therefore, the *de minimis* thresholds for NOx and VOCs (referred to as ozone precursors) were 100 tons per year and 50 tons per year, respectively.

[5] Particulate matter is divided into two particle size categories: coarse particles with a diameter less than 10 micrometers (PM_{10}) and fine particles with a diameter of less than 2.5 micrometers ($PM_{2.5}$). Nitrogen oxides (NO_X) and volatile organic compounds (VOC) are regulated as precursors to ozone.

[6] Nonattainment areas for criteria pollutants (green book), current as of February 29, 2024. Retrieved March 11, 2024, from https://www.epa.gov/green-book

Indirect Source Review

New York State regulations for indirect sources apply only to the County of New York south of 60th Street. The Proposed Project is taking place in Oneida County. Therefore, the Proposed Project does not require an indirect source review.

4.1.2 Environmental Consequences

No-Action Alternative

No development takes place with this alternative. Therefore, there is no impact to air quality.

Proposed Project

The Proposed Project will result in an increase in emissions from stationary sources (i.e. heaters) and ground access vehicle trips. Construction activities (including demolition) related to the Proposed Project may also temporarily affect air quality and GHG emissions.

Construction Emissions

Construction associated with the Proposed Project would result in short-term changes to air emissions from sources such as:

- Exhaust from nonroad construction equipment used for site clearing, grading, demolition, milling and paving, etc.
- On-road vehicles associated with transport and delivery of supplies, construction worker trips, etc.
- Fugitive dust emission sources include site preparation and land clearing, equipment movement on unpaved roads, and evaporative emissions from the application of asphalt paving.

Construction activities associated with the Proposed Project are expected to begin in 2025 and be completed in 2030. **Table 4.1** provides the construction emissions associated with construction of the Proposed Project for the 2025 through 2030 construction years compared with the appropriate EPA *de minimis* thresholds.

Table 4.1 – *De Minimis* Thresholds and Total Construction Emissions

Year	VOC (tons/year)	NOx (tons/year)	$PM_{2.5}$ (tons/year)	PM_{10} (tons/year)	CO (tons/year)	SO_2 (tons/year)
De Minimis Threshold	*50*	*100*	*100*	*100*	*100*	*100*
2025	7.43	2.44	0.18	0.81	4.07	0.018
2026	25.91	13.79	0.60	2.13	34.49	0.077
2027	25.99	12.49	0.49	1.92	39.81	0.077
2028	22.06	6.55	0.26	1.68	25.52	0.055
2029	21.64	6.13	0.22	1.64	22.50	0.053
2030	21.60	5.84	0.20	1.62	21.37	0.053

Source: Air Quality and Climate Analysis Technical Report, HMMH, February 2024

Operational Emissions (stationary sources and vehicle trips)

The Proposed Project includes construction of new buildings and hangars that will be heated using natural gas furnaces. The new buildings and hangars are expected to come on-line in phases beginning in 2028

through 2031. As a conservative assumption, the total estimated fuel usage of all the furnaces coming on-line simultaneously were assumed for each operational year (2028 through 2031).

Ground access vehicles (GAVs) include on-road vehicle activity associated with passengers, tenant operations, and airport employees' travel to and from the Airport. Criteria pollutant emission factors representing passenger vehicles in Oneida County were used in the EPA's MOVES for on-road equipment. It was assumed that for 2028 through 2031, GAV traffic generated by the Proposed Project would occur in stages, with each year adding additional vehicle trips based on expected openings of the new buildings and hangars.

Table 4.2 provides operational emissions of new stationary and ground access vehicles criteria pollutants during the 2028 through 2031 phase-in period under the Proposed Project compared with the appropriate US EPA *de minimis* thresholds.

Table 4.2 – *De Minimis* Thresholds and Total Operational Emissions

Year	VOC (tons/year)	NOx (tons/year)	$PM_{2.5}$ (tons/year)	PM_{10} (tons/year)	CO (tons/year)	SO_2 (tons/year)
De Minimis Threshold	*50*	*100*	*100*	*100*	*100*	*100*
Stationary Sources						
2028 through 2031	0.37	5.07	0.13	0.13	6.54	0.04
General Access Vehicles						
2028	1.91	1.43	0.05	0.06	61.69	0.04
2029	0.14	0.11	0.004	0.004	4.63	0.001
2030	--*	--	--	--	--	--
2031	0.68	0.51	0.02	0.02	21.99	0.01

*(--) denotes no new GAV trips are anticipated in 2030
Source: Air Quality and Climate Analysis Technical Report, HMMH, February 2024

Table 4.3 provides a summary of the total annual Proposed Project emissions (operations and construction) compared with the appropriate US EPA *de minimis* thresholds.

Table 4.3 – *De Minimis* Thresholds and Total Annual Proposed Project Emissions

Year	VOC (tons/year)	NOx (tons/year)	$PM_{2.5}$ (tons/year)	PM_{10} (tons/year)	CO (tons/year)	SO_2 (tons/year)
De Minimis Threshold	*50*	*100*	*100*	*100*	*100*	*100*
2025	7.43	2.44	0.18	0.81	4.07	0.018
2026	25.91	13.79	0.60	2.13	34.49	0.077
2027	25.99	12.49	0.49	1.92	39.81	0.077
2028	24.34	13.05	0.44	1.87	92.8	0.13
2029	22.22	11.3	0.35	3.17	33.7	0.09
2030	21.97	10.91	0.33	1.75	27.91	0.09
2031	1.05	5.58	0.15	0.15	28.5	0.05

Source: Air Quality and Climate Analysis Technical Report, HMMH, February 2024

As demonstrated in **Table 4.3**, the Proposed Project does not exceed *de minimis* thresholds for any criteria pollutants.

4.1.3 Mitigation

The following best management practices (BMPs) are recommended to reduce the emissions of criteria pollutants:

- Use construction equipment that can operate on alternative fuels or electricity wherever possible to minimize emissions associated with diesel and gasoline powered equipment.
- During construction, institute particulate control measures, such as watering and stabilizing wind erodible soil as soon as practical after disturbance. It should be noted the emissions associated with a watering truck have been included in the emission estimates for summertime scenarios.
- Reducing exposed erodible surface area through appropriate materials and equipment staging procedures.
- Covering exposed surface areas in an expeditious manner.
- Reducing equipment idling times.
- Reducing vehicle speeds onsite.
- Ensuring contractor knowledge of appropriate fugitive dust and equipment exhaust controls.
- Soil stabilization via cover or periodic watering.
- Using covered haul trucks during materials transportation.
- Suspension of construction activities during high-wind conditions.
- All air permits or registrations, including Title V, Air State Facility (ASF), and Air Facility Registrations (AFR) will be obtained prior to construction (groundbreaking). As design progresses for individual project elements, permitting requirements will be determined and followed.
- Air emissions sources will consider mitigation recommendations identified in the Climate Leadership and Community Protection Act (CLCPA).

- If an air permit is required, an analysis of pollution burden on disadvantaged communities (DACs) and preparation of an Existing Burden Report may be required by NYSDEC in compliance with the newly enacted state law.

As the various components of the proposed action are designed, the permitting requirements for combustion sources or generators associated with the newly constructed buildings will be evaluated in terms of applicability to state and local regulations.

4.1.4 Significance Threshold and Conclusions

As described in FAA Order 1050.1F, *Exhibit 4-1 - Significance Determinations for FAA Actions*, a Proposed Project is considered to have a significant impact upon air quality if, "the action would cause pollutant concentrations to exceed one or more of the NAAQS, as established by the EPA under the CAA, for any of the time periods analyzed, or to increase the frequency or severity of any such existing violations."

The Proposed Project would not result in changes to aircraft operations at the Airport, and therefore, would have no impact on aircraft emissions. The Proposed Project will result in an increase in emissions from stationary sources (i.e. heaters) and ground access vehicle trips. Air quality impacts for the six criteria air pollutants (NAAQS) from operations or during temporary construction and demolition activities would not cause pollutant concentrations to exceed one or more of the NAAQS. With the implementation of best management practices, no significant, adverse, or long-term impacts to air quality are anticipated, therefore, the Proposed Project would have **no significant effect** on air quality.

4.2 Climate

Climate change is a global phenomenon that can have local impacts.[7] Scientific measurements show that Earth's climate is warming, with concurrent impacts including warmer air temperatures, increased sea level rise, increased storm activity, and an increased intensity in precipitation events. Increasing concentrations of GHG emissions in the atmosphere affect global climate.[8], [9] GHG emissions result from anthropogenic sources, including the combustion of fossil fuels. GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), and fluorinated gases.[10] CO_2 is the most important environmental change caused or influenced by people, either directly or indirectly (anthropogenic) because it is a long-lived gas that remains in the atmosphere. Anthropogenic sources of GHG emissions include the combustion of fossil fuels. Scientific measurements show that Earth's climate is warming, with concurrent impacts including warmer air temperatures, increased sea level rise, increased storm activity, and an increased intensity in precipitation events.

[7] As explained by the US EPA, "greenhouse gases, once emitted, become well mixed in the atmosphere, meaning U.S. emissions can affect not only the U.S. population and environment but other regions of the world as well; likewise, emissions in other countries can affect the United States." U.S. Environmental Protection Agency, Climate Change Division, Office of Atmospheric Programs, Technical Support Document for Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act 2-3, 2009, https://www.epa.gov/ghgemissions/technical-support-document-endangerment-and-cause-or-contribute-findings-greenhouse

[8] Global warming potentials are based on the 100-year time horizon GWPs presented in the latest Intergovernmental Panel on Climate Change (IPCC), Sixth Assessment Report (AR6), Table 7.SM.7, March 2021. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter_07_Supplementary_Material.pdf.

[9] Global warming potentials are based on the latest Intergovernmental Panel on Climate Change (IPCC), Sixth Assessment Report (AR6), March 2021. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter_07_Supplementary_Material.pdf.

[10] U.S. Environmental Protection Agency, Overview of Greenhouse Gases, http://www3.epa.gov/climatechange/ghgemissions/gases.html

The earth's global temperature has risen by 1.5°F over the past century and is projected to continue to rise.[11] Small changes in the global temperature over time can translate into large and potentially dangerous shifts in climate and weather on a global scale and even at the local level. Many states have seen changes in rainfall, resulting in more floods, droughts, or intense rain, as well as more frequent and severe heat waves.[12]

Research has shown that there is a direct link between fuel combustion and GHG emissions. Therefore, sources that require fuel or power at an airport are the primary sources that would generate GHGs including construction emissions.

Although no federal standards have been set for GHG emissions, it is well established that GHG emissions can affect climate. Furthermore, per FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, the discussion of potential climate impacts should be documented in a separate section of the NEPA document, distinct from air quality.[13] Where the proposed action or alternative(s) would result in an increase in GHG emissions, the emissions should be assessed either qualitatively or quantitatively. The guidance recommends consideration of: (1) the potential effects of a proposed action or its alternatives on climate change as indicated by its GHG emissions; (2) the implications of climate change for the environmental effects of a proposed action or alternatives. The overall reduction of aviation related GHG emissions impacts on climate is a goal, but it is not a regulatory mandate. [redacted]

4.2.1 Affected Environment

An internet web search of GHG emissions for the Oneida County showed no results. However, the state of New York has conducted GHG inventories over the years. The New York State Statewide Greenhouse Gas Emissions Report (NYS GHG Emissions Report) is a foundational component of the State's strategy for addressing climate change. This emission inventory is designed to meet the requirements of the Climate Leadership and Community Protection Act (CLCPA)[15] to measure progress at reducing greenhouse gas (GHG) emissions and make GHG information accessible to a broad audience. The NYS GHG Emissions Report provides the most up-to-date estimation of annual GHG emissions from 1990 through 2021. The structure and content of the report is aligned with methodology from the Intergovernmental Panel on Climate Change (IPCC) for governmental greenhouse gas accounting as used in the U.S. national greenhouse gas emissions report.[16] Based on the report, annual emissions of CO_2 increased in 2021 compared to 2020, however annual emissions have declined 20% from 1990 to 2021 (**Appendix E**, pages E-15 and E-16).

An Air Quality and Climate Analysis was completed by HMMH in February 2024 to quantify emissions to make an informed decision whether the Proposed Project would have the potential to cause significant climate change effects (**Appendix E**, pages E-13 to E-25). GHG emissions inventories were modeled using MOVES4 for construction emissions. The Proposed Project is not anticipated to increase the number of

[11] https://www.aqhelp.com/AQdocs.html
[12] https://aqhelp.com/Documents/FINAL%20-%20AF%20AQ%20EIAP%20Guide%20Vol%201%20-%202019.pdf
[13] https://www.faa.gov/sites/faa.gov/files/about/office_org/headquarters_offices/apl/3-climate.pdf
[redacted]
[15] Chapter 106 of the Laws of 2019; Environmental Conservation Law (ECL) Article 75 and as adopted in 6 NYCRR Part 496
[16] EPA. 2023. Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2021. EPA 430-R-23-002. Washington, D.C.: U.S. Environmental Protection Agency.

forecast aircraft operations or change the fleet mix, taxi times, compared to the No Action. Therefore, aircraft and associated ancillary activities were not included in the GHG calculations.

4.2.2 Environmental Consequences

No Action Alternative

There would be no increase in GHG emissions because of the No Action Alternative, therefore, there is no impact to climate.

Proposed Project

The Proposed Project will result in an increase in emissions from stationary sources (i.e. heaters) and ground access vehicle trips. Construction activities (including demolition) related to the Proposed Project may also temporarily affect air quality and GHG emissions.

Construction & Operational Emissions

Construction Emissions: Construction activities associated with the Proposed Project are expected to begin in 2025 and be completed in 2030. Construction associated with the Proposed Project would result in short-term changes to air emissions from sources such as:

- Exhaust from nonroad construction equipment used for site clearing, grading, demolition, milling and paving, etc.
- On-road vehicles associated with transport and delivery of supplies, construction worker trips, etc.
- Fugitive dust emission sources from site preparation and land clearing, equipment movement on unpaved roads, and evaporative emissions from the application of asphalt paving.

Operational Emissions (stationary sources and vehicle trips): The Proposed Project includes construction of new buildings and hangars that will be heated using natural gas furnaces. The new buildings and hangars are expected to come on-line in phases beginning in 2028 through 2031. Implementation of the Proposed Project would increase operational emissions from new stationary sources to provide heat to the new buildings and hangars and new vehicle trips associated with passengers, tenant operations, and Airport employees' travel to and from the Airport. **Table 4.4** presents the annual GHG emissions for construction activities and net operational changes associated with the Proposed Project for 2025 through 2031.

Table 4.4 - Total Proposed Project Greenhouse Gas Emissions (metric tons)

Year	CO_2 metric tons/year	CH_4 metric tons/per	N_2O metric tons/year	$CO_2e^{2,3}$ metric tons/year
Construction				
2025	3,960	0.008	0.010	3,963
2026	17,048	0.076	0.062	17,067
2027	16,518	0.089	0.054	16,535
2028	11,084	0.055	0.049	11,099
2029	10,707	0.050	0.048	10,721
2030	10,684	0.047	0.046	10,699
Operations (Stationary and GAV)				
2028	14,190	0.28	0.17	14,245

2029	7,786	0.15	0.14	7,828
2030	7,267	0.14	0.13	7,308
2031	97,35	0.19	0.15	9,781

Source: Air Quality and Climate Analysis Technical Report, HMMH, February 2024

[redacted]

Climate Assessment

To evaluate the effects of climate change on a proposed action, two subjective qualitative assessments are performed: (1) the impact of climate change on a proposed action, and (2) the impact of climate change on the action's environmental impacts to address the latest CEQ guidance on GHG and Climate. The US EPA has developed state specific factsheets regarding climate change impacts. The US EPA factsheet for New York shows the potential state impacts as follows:

- Increasing Temperature and Changing Precipitation Patterns.
- Rising Sea Level
- Coastal Storms
- Shoreline Erosion
- Coastal Ecosystems
- Great Lakes
- Winter Recreation

[redacted]

- Agriculture; and
- Human Health

Based on the location of the Proposed Project there would be no impact related to rising sea level, shoreline erosion, coastal storms, and coastal ecosystems. Potential local impacts for the Rome area include increasing temperature and changing precipitation patterns, Great Lakes, winter recreation, agriculture, and human health. Increases in construction emissions will be temporary. Operational emissions will be slightly higher compared to existing conditions. However, the increases would comprise a small portion of the state of New York 2021 GHG emissions 367 million metric tons of carbon dioxide equivalent (MMTCO2e), the US-based emissions of 6,472 million metric tons CO2e, and even less than the 49 gigatons of carbon dioxide equivalent global GHG emissions. Based this information, no significant impact on GHGs or climate is expected as a result of the Proposed Project.

It should be noted that for this EA, the best available science, data, and rationale for the GHG analysis is based on the interim guidance. FAA's guidance/policy will evolve and change going into the future.

4.2.3 Mitigation

There are currently no federal requirements for reporting greenhouse gases from aviation sources and no significance thresholds. Therefore, mitigation measures would not be necessary with regard to climate change. However, any reduction in the volume of fuel combusted will reduce GHG emissions and be consistent with New York State's goal to reduce greenhouse gas emissions. The following recommendation should be incorporated into the Proposed Project:

- Use construction equipment that can operate on alternative fuels or electricity wherever possible to minimize emissions associated with diesel- and gasoline-powered equipment.
- Air emissions sources will consider mitigation recommendations identified in the Climate Leadership and Community Protection Act (CLCPA)

4.2.4 Significance Threshold and Conclusions

While FAA 1050.1F does not provide a significance threshold for aviation related GHG emissions, the CEQ specifically asks agencies to consider the potential effects an action would have on climate change as indicated by its GHG emissions and the implications of climate change for the environmental effects of an action.

The Proposed Project would not cause or create an increase in aircraft operations at the Airport. There would be a temporary increase in GHG emissions during construction activity. Emissions resulting from construction of the Proposed Project would not result in significant increases of CO2emissions. The increase in GHG emissions is negligible when compared to the amount of state and global GHG emissions, therefore, the Proposed Project would have **no significant effect** on climate.

4.3 Biological Resources

Section 7(c) of the Endangered Species Act (ESA) of 1973 (16 USC 1531 et seq.) requires that the potential impacts to rare, threatened, and endangered species of flora and fauna and their critical habitats be identified to avoid adverse impacts to these species. Federally listed species include those that have been designated as threatened, endangered, or candidate species by the U.S. Fish and Wildlife Service (USFWS). Impacts to state listed animals or plants, or significant natural communities must also be assessed.

4.3.1 Affected Environment

Wildlife and Vegetation

Aerial photographs and information collected as part of a Species and Habitat Assessment identified the following vegetative communities in the Project area (**Appendix F** and **Figure 4.3**):

- Mowed lawn
- Mowed lawn with trees
- Paved road/path
- Railroads
- Shallow emergent marsh
- Successional northern hardwoods
- Urban structure exterior

Based on a review of iNaturalist, Oneida County, NY, wildlife anticipated to be found within the Project area include Eastern gray squirrel, American red squirrel, eastern chipmunk, white-tailed deer, red fox, ground hog, raccoon, eastern cottontail, a variety of rodents, American toad, and common garter snake. Additionally, various birds, butterflies, moths, and other insects are likely present (**Appendix F**, pages F-3 to F-7). The NYSDEC New York Nature Explorer for the City of Rome identified a variety of wildlife including birds, butterflies and moths, dragonflies, and a variety of flowering plants (**Appendix F**, pages F-9 to F-11).

Federally Protected Species; Critical Habitat; Essential Fish Habitat

A review of the USFWS Information, Planning, and Consultation (IPaC) system and USFWS Official Species List obtained on February 27, 2025 (**Appendix F**, pages F-17 to F-32 and **Appendix F**, pages F-33 to F-39B) indicated that one endangered [18] species (Northern Long-eared Bat), one proposed endangered[19] species (Tri-colored Bat), and one proposed threatened[20] species (Monarch Butterfly) may occur in the vicinity of the Project area. Therefore, a Species and Habitat Assessment (Assessment) was conducted to determine if the Project area has suitable foraging and roosting/breeding habitat for federally protected species (**Appendix F**, pages F-41 to F-85B). The Assessment determined the Project area does not have the potential to contain northern long-eared bat (NLEB) or Tri-colored Bat roosting/breeding habitat but does have the potential for suitable foraging habitat and does have the potential to contain Monarch Butterfly habitat (**Table 4.3A**, **Appendix F**, page F-48).

No designated or proposed critical habitat or fish hatcheries in the vicinity of the Project area were identified by the USFWS IPaC and Official Species List (**Appendix F**, pages F-32 and F-39A).

Based on a review of the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service Essential Fish Habitat (EFH) Mapper, there are no EFH's, Habitats of Concern, or EFH areas protected from fishing located within the Project area[21]. A response received from NOAA dated June 8, 2021, indicated no federally listed or proposed threatened or endangered species under their jurisdiction are known to exist in the Project area and no further coordination with the NOAA is necessary (**Appendix D**, page D-47).

[18] Endangered species are those which are in danger of extinction throughout all or a significant portion of its range
[19] Proposed endangered species means any species which is likely to become endangered within the foreseeable future throughout all or a significant portion of its range. These species do receive no statutory protection under ESA.
[20] Proposed threatened species is any species which is likely to become endangered within the foreseeable future throughout all or a significant portion of its range. These species do receive no statutory protection under ESA.
[21] EFH Mapper (noaa.gov)

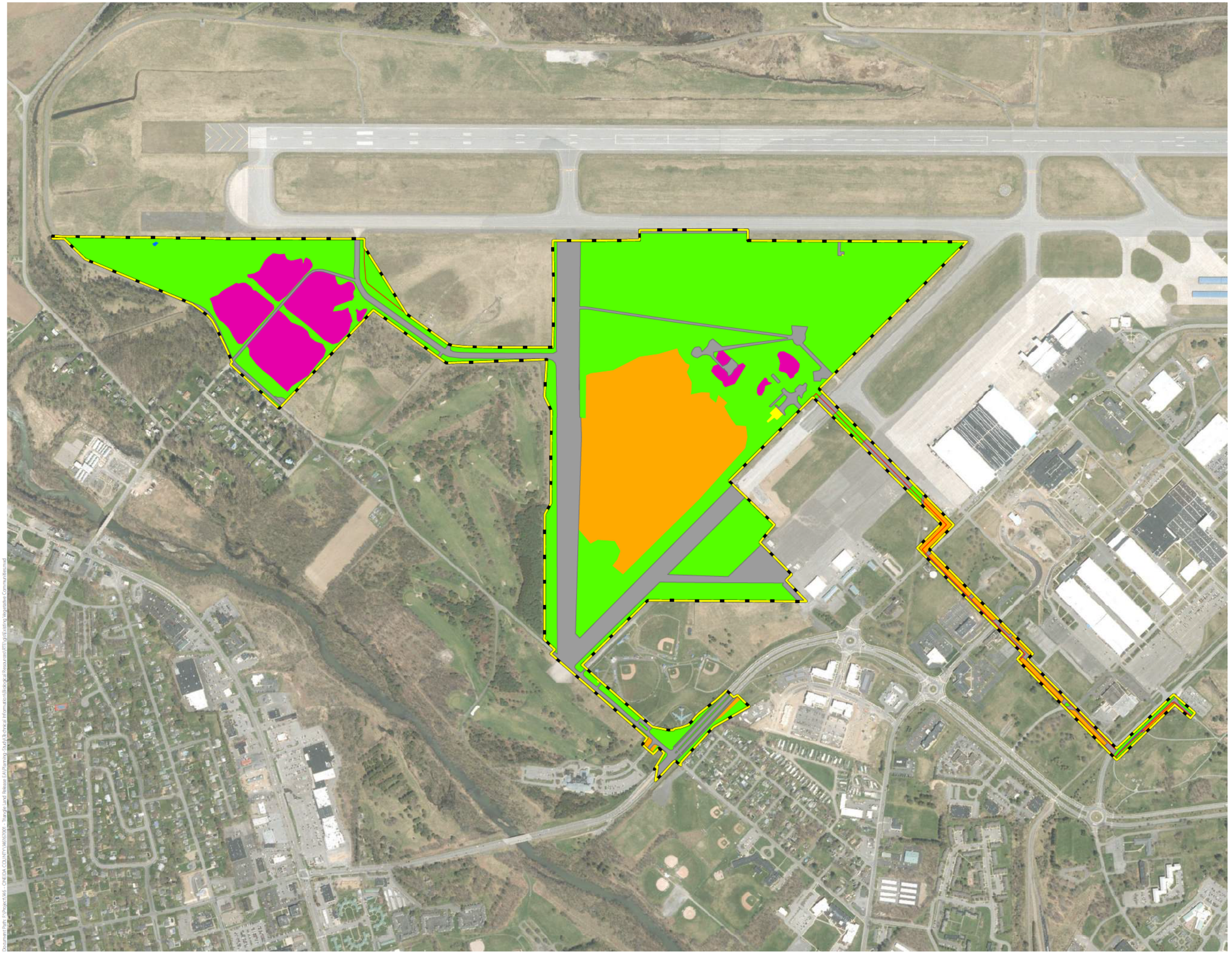


Figure 4.3

Vegetative Communities

- Area of Interest
- Proposed Project Area/ Construction Limits
- Paved Roads/Paths
- Mowed Lawn
- Mowed Lawn with Trees
- Shallow Emergent Marsh
- Urban Structures
- Succesional Northern Hardwoods
- Railroads

N

0 425 850 1,700 Feet

1 in. = 850 ft.
When printed at 11 in. by 17 in.

EA for Land Release and Airport Business Park Development

Sources: ESRI World Street Base Map; City of Rome, Oneida County, & NYS from USCB TIGER; Created by C&S Engineers, Inc.

State Protected Species

A review of the NYSDEC Environmental Resource Mapper (ERM) and the NYSDEC Environmental Assessment Form (EAF) mapping tool indicated that the Project area may be in the vicinity of animals listed as endangered, threatened or rare (**Appendix F**, pages F-12 to F-16). Therefore, the NYSDEC regional office and NY Natural Heritage Program (NYNHP) were contacted to determine if any rare or state listed animals or plants, or significant natural communities are located within the Project area.

Responses received from the NYSDEC dated September 6, 2021 (**Appendix D**, pages D-62A and D-62B), and the NYNHP dated October 4, 2022 (**Appendix D**, pages D-114 to D-115A), identified the Upland Sandpiper (*Bartramia longicauda)* (threatened) as having been documented within the Project area, the Whorled Mountain Mint (*Pycnanthemum verticillatum* var. *verticillatum*) (endangered) as having been documented within ¼ mile west of the Project area, and the Northern Ground Cedar (*Diphasiastrum complanatum*) (threatened) as having been documented within ½ mile south of the Project area (**Appendix D**, page D-115A). The NYSDEC stated "*alternatives should be developed to reduce potential impacts to grassland birds and raptors. A habitat assessment should be completed…additional information is required for the DEC to make specific recommendations on the scope of surveys, including the current habitat conditions, a breakdown of cover types acreage-forested, planted, concrete, open grass areas, etc. This data should then be compared to proposed conditions to determine potential impact values*" (**Appendix D**, page D-62B).

The Species and Habitat Assessment evaluated the potential for state protected species to be in the Project area based on habitat (**Appendix F**, pages F-41 to F-85B). The Assessment determined the Project area does not have the potential to contain Whorled Mountain Mint or Northern Ground Cedar but does contain suitable habitat for Upland Sandpipers **(Table 4.4A**, **Appendix F**, page F-47).

No state designated critical habitat was identified (Appendix D, pages D-62A to D-62B and D-114 to D-115A).

Table 4.4A - Potential for Federal and State Listed Species & Habitat in Project Areas

Common Name	Scientific Name	Potential for Species in Project Areas (Yes/No)	Potential for Habitat in Project Areas (Yes/No)
Northern Long-eared Bat	*Myotis septenirionalis*	No	Yes
Upland Sandpiper	*Bartramia longicauda*	Yes	Yes
Whorled Mountain Mint	*Pycnanthemum verticillatum var. verticillatum*	No	No
Northern Ground Cedar	*Diphasiastrum complanatum*	No	No
Tri-Colored Bat	*Perimyotis subflavus*	No	Yes
Monarch Butterfly	*Danaus plexippus*	Yes	Yes

Source: C&S Engineers, Inc.

Based on the results of the Species and Habitat Assessment, a Grassland Species Assessment was prepared by TRC in December 2022 to evaluate suitability for grassland breeding birds and wintering raptors (**Appendix F**, pages F-87 to F-98). The Assessment included a desktop analysis and field evaluation to characterize the presence and extent of grassland habitat within the Project area in context of grassland birds (**Figure 4.4**). The Assessment concluded *"the Project area provides habitat of variable suitability for grassland species. A total of 160 acres of grassland comprise approximately 56% of the Project area, while 138.6 acres (approximately 49% of the total Project area) provide contiguous grassland habitat that may be suitable for grassland obligate species".* **Table 4.5** summarizes meetings, field visits, and coordination that has taken place with the NYSDEC regarding Upland Sandpiper impacts and mitigation measures, as well as meetings, field visits, and coordination that has taken place with the NYSDEC regarding Upland Sandpiper impacts and mitigation measures. "*Based on the results of the assessment and breeding season occurrences of upland sandpiper within the past five years, it is our opinion that the Proposed Project has the potential to impact suitable habitat. However, …the Proposed Project is not expected to result in significant impacts to raptor overwintering habitat".* The Grassland Habitat Assessment was submitted to the NYSDEC for review and comments on December 6, 2022. A meeting was held with the NYSDEC on January 5, 2023, to discuss the results of the Grassland Habitat Assessment. NYSDEC concurred with assuming presence of the Upland Sandpiper within grassland areas identified in the Project area. The NYSDEC noted the Proposed Project will require an Incidental Take permit, development of avoidance and minimization measures, and mitigation will need to be established before impacts take place.

Figure 4.4 - Grassland Areas Within Project Area



Source: Grassland Habitat Assessment, 12/6/22

Table 4.5 - Summary of NYSDEC Upland Sandpiper Coordination

Date	Field Visit / Meeting / Communications	Topics & Issues Discussed	Appendix
January 5, 2023	Conference Call Meeting	♦ TRC presented findings of habitat assessment. ♦ TRC/C&S noted assuming presence for Upland Sandpiper and associated breeding grassland bird habitat – NYSDEC concurred. ♦ NYSDEC noted Proposed Project will require an "Incidental Take" permit. ♦ NYSDEC noted avoidance and minimization measures should be included. ♦ Mitigation measures discussed on-airport not feasible due to wildlife conflicts, off-site mitigation for grassland habitat will be required; mitigation area will require establishment of NYSDEC approved habitat management plan; mitigation will need to be established before impact takes place	Appendix F, page F-176
February 22, 2023	Field Visit / Meeting	♦ Three upland sandpiper habitat areas identified in Project area by NYSDEC. ♦ Potential mitigation measures and mitigation ratio discussed	Appendix F, pages F-177 to F-179
May 10, 2023	Meeting/Mitigation Site Visit	♦ Three upland sandpiper habitat areas identified in Project area by NYSDEC. ♦ Potential mitigation measures and mitigation ratio discussed. ♦ NYSDEC staff visited proposed mitigation site (County owned parcel adjacent to Cider Street (part of former Oneida County Airport) to assess feasibility to accommodate Upland Sandpiper	Appendix F, pages F-181 to F-196
June 29, 2023	Email Communication	♦ County's preferred mitigation strategy submitted to NYSDEC to reduce minimize impacts in development area and preserve areas as grassland. ♦ Use former Oneida County Airport property. ♦ Determine if Dept. of Homeland Security property available for conservation deed. ♦ Acquire private property	Appendix F, pages F-100 to F-120
September 29, 2023	Email Communication	♦ County submitted Preliminary Avoidance, Minimization, and Mitigation Measures for review and comment	Appendix F, pages F-121 to F-124
October 27, 2023	Email Communication	♦ NYSDEC stated traffic roundabout and utility corridor portions of Proposed Project will not impact Upland Sandpiper ♦ Access road into site located adjacent to southern most Upland Sandpiper habitat, if construction activities take place outside of April 23rd to August 15th would avoid direct take of birds and would not require surveys or mitigation	Appendix F, page F-127
December 1, 2023	Email Communication	♦ Confirmed 3:1 mitigation ratio is required for any impacted/lost sandpiper habitat. ♦ NYSDEC requested map depicting total anticipated buildout with a 100-foot buffer applied to new buildings, roads, and other infrastructure to confirm acreage of impact. ♦ Mitigation areas for new habitat creation require a minimum sized site of 25 acres. ♦ NYSDEC stated additional areas to mitigate located in Town of Deerfield	Appendix F, page F-130
December 15, 2023	Email Communication	♦ NYSDEC reviewed updated habitat impact map with 100-foot buffer. ♦ Concur with calculation for habitat take of 62.41 acres with required mitigation of 187.23 acres (3:1 ratio)	Appendix F, page F-133
January 31, 2024	Email Communication	♦ Documentation and drawings provided to NYSDEC to quantity acreage of County owned parcel (Cider Street parcel part of former Oneida County Airport) that can be used for new habitat creation. ♦ County requested consideration of an additional site. ♦ County asked if farmland could be rotated to always preserve a portion as hay/grassland (i.e., 40 acres of farmland acquired in fee simple or through a conservation easement lease with 20 acres always preserved as hay/grassland)	Appendix F, pages F-139 to F-146
February 20, 2024	Email Communication	♦ NYSDEC agreed 45.39 acres of Cider Street parcel can be used as for new habitat. ♦ NYSDEC stated 67.46 acres that contain shrubs and trees would require full conversion to grassland conditions and monitoring to prove proper conversion of the habitat type. ♦ NYSDEC stated 26.37 acres of parcel not viable due to grades.	Appendix F, pages F-147 to F-149

Date	Field Visit / Meeting / Communications	Topics & Issues Discussed	Appendix
		◆ NYSDEC stated additional site for consideration not an option the area is too long and narrow and surrounded by disturbance, both development and land use ◆ NYSDEC stated the minimum size for mitigation would be 25 acres, hesitant to approve farmland areas as this method since there would not be consistent habitat available for upland sandpiper, would result in lag in provided habitat as the rotation occurs, and it would take years between rotations for grassland habitat to return	
April 1, 2024	Email Communication	◆ Proposed Upland Sandpiper mitigation plan submitted to NYSDEC	Appendix F, pages F-151 to F-158
April 16, 2024	Email Communication	◆ NYSDEC agreed to parcels included as part of the mitigation area. ◆ Noted vegetation removal within the federal wetland will convert forested to emergent/wet meadow and will require vegetation monitoring to make sure wetland does not succeed into a scrub shrub wetland cover type. ◆ Noted conservation easements would need to be obtained over entire 187.23 acres of new habitat areas prior to development taking place, in perpetuity and recorded on the parcel deeds. ◆ Noted habitat conversion will be identified in the Net Conservation Benefit Plan compiled by the County and made a part of the Part 182 permit. ◆ County will need a SPDES General Permit and SWPPP. Noted if more than five acres are disturbed at any one time this requires separate permission from the Region. NYSDEC will be looking for a phasing plan to for erosion and sediment control. ◆ Noted for newly cleared and grubbed areas, seeding/planting should occur to ensure grassland habitat is the result, NYSDEC can provide specifics on ideal seed mixes for grassland habitat	Appendix F, pages F-159 to F-168
April 20, 2024	Email Communication	◆ Revised Upland Sandpiper mitigation plan submitted to NYSDEC	Appendix F, pages F-159 to F-168
April 23, 2024	Email Communication	◆ NYSDEC noted that a cool season grass seed mix should be used for the establishment of breeding grassland habitat. ◆ NYSDEC had no further comments on the mitigation plan. ◆ Upon completion of SEQR process, the project would need to submit a complete application for the Part 182 Take Permit, which includes a Joint Application Form, SEQR Form, and the relevant information found in 6 NYCRR 182.11 of the Environmental Conservation Law.	Appendix F, page F-170

Source: C&S Engineers, Inc.

Migratory Birds

The Proposed Project has been evaluated for its potential to effect bird species of concern in accordance with the Migratory Bird Treaty Act of 1918 (MBTA, U.S.C. 703-712). The USFWS IPaC resource list obtained from the IPaC system on February 27, 2025 (**Appendix F**, pages F-25 to F-27), identified 11 migratory birds of conservation concern (BCC) that could be affected by activities within or near the Project area (**Table 4.6**). Based on the Species and Habitat Assessment, the Project area has suitable foraging habitat for seven of the 11 identified migratory birds, and suitable nesting/breeding habitat for nine of the 11 identified migratory birds (**Appendix F**, pages F-49 to F-51).

Table 4.6 - Potential for Migratory BCC & Habitat in Project area

Common Name	Scientific Name	Potential for Species in Project area (Yes/No)	Potential for Habitat in Project area (Yes/No)
Bald Eagle	*Haliaeetus leucocephalus*	No	No
Belted Kingfisher	*Megaceryle alcyon*	No	No
Black-billed Cuckoo	*Coccyzus erythropthalmus*	Yes	Yes
Blue-winged Warbler	*Vermivora pinus*	Yes	Yes
Bobolink	*Dolichonyx oryzivorus*	Yes	Yes
Canada Warbler	*Cardellina Canadensis*	Yes	No
Chimney Sweep	*Chaetura pelagica*	Yes	Yes
Eastern Meadowlark	*Sturnella magna*	Yes	Yes
Evening Grosbeak	*Coccothraustes vespertinus*	Yes	No
Rose-breasted Grosbeak	*Pheucticus lodovicianus*	Yes	Yes
Wood Thrush	*Hylocichla mustelina*	Yes	Yes

Source: C&S Engineers, Inc.

4.3.2 Environmental Consequences

No Action Alternative

The No Action Alternative would not change existing site conditions or habitats. Therefore, there would be no impacts to biological resources.

Proposed Project

Habitat Alteration/Loss

The existing Project area is 286 acres. Implementation of the Proposed Project will result in the following habitat alterations:

- Loss of 17.5 acres of successional northern hardwoods.
  - 8.5 acres will remain to serve as a tree screen between residential properties and the project site.
- Loss of 62.41 acres of mowed lawn that is considered to be upland sandpiper breeding habitat.
  - 30 acres within the Project area will remain as grassland for Upland Sandpiper habitat.

There will be a loss of 17.5 acres of successional northern hardwoods. This involves converting upland forested areas to paved access roads, paved automobile parking areas, stormwater management areas, and

buildings. Losing 17.5 acres of successional northern hardwoods is not considered significant because it is a relatively small amount of successional northern hardwoods, and there are significant amounts of forested areas adjacent to the Airport for wildlife to migrate to (north and west contain 79 acres and east and south contain 436 acres). As noted above, 8.5 acres of successional northern hardwoods will remain within the Project area.

There will also be a loss of approximately 62.41 acres of maintained grassland that is considered suitable breeding/nesting and foraging habitat for the Upland Sandpiper. Further discussion is included in the State Protected Species section and mitigation below.

Since the Proposed Project does not impact ecologically sensitive areas (i.e., wetlands, critical environmental areas, etc.), is primarily taking place in a built environment, and includes restoring areas to mowed lawn/maintained grassland or landscaped areas where pavement will be removed, no significant impacts to ecological communities is expected.

Wildlife

In addition to altering the vegetative cover types there will be a permanent loss of forested habitat for wildlife resulting from site development activities (i.e., buildings, auto parking, access roads, and stormwater management areas). In the short-term, the alteration or loss of vegetation would disrupt wildlife populations that use the area. The 286-acre Project area is predominantly mowed lawn, mowed lawn with trees, and paved developed areas (258 acres or 89%). Forested areas (successional northern hardwoods) represent 26.05 acres or 9% percent of the Project area. Forested areas will be reduced by 17.5 acres at full site build out.

Tree removal will take place during the winter months, which will decrease overall ecological impacts. Since the Proposed Project will not sever habitat connectivity, there are adjacent forested areas that wildlife can migrate to (north and west contain 79 acres and east and south contain 436 acres), 8.5 acres of existing forested habitat will be preserved to maintain a buffer between the Airport and residential properties, and construction impacts to wildlife will be temporary, no significant impacts to wildlife are expected.

Federally Protected Species

On January 6, 2025, the online Information, Planning and Consultation (IPaC) program was used to obtain an Official Species List (OSL) of federally listed species potentially within the Project Area with an updated version obtained on February 27,2025 (**Appendix D**, D-336 to D-342). The Northern Long-eared Bat (Endangered), Tricolored Bat (Proposed Endangered), and the Monarch Butterfly (Proposed Threatened) were identified on the OSL.

Subsequently on January 30, 2025, the IPaC's Northern Long Eared Bat (NLEB)/Tricolored Bat (TCB) Determination Key (D-Key) was used to obtain assisted-effects determinations to help facilitate the consultation process. The D-Key provided a "not likely to adversely affect" determination for the NLEB. In addition, the D-Key provided a "may effect" determination for the TCB, which indicated further review was needed with the USFWS (**Appendix D**, pages D-343 to D-357).

FAA initiated further USFWS review / consultation on March 25, 2025, indicating a determination of "Not Likely to Adversely Affect" the Northern Long-eared Bat (NLEB), "May Affect, Not Likely to Adversely Affect" the Tri-colored Bat (TCB), and "No Effect" for the Monarch Butterfly (**Appendix D**, pages D-308 to D-357).

Based on a telephone call and email communications with the USFWS on April 8, 2025 (**Appendix D**, pages D-402 to D-404) and the USFWS response letter received on April 25, 2025 (**Appendix D**, pages D-405 to D-407), the determinations were revised to "Not Likely to Jeopardize the Continued Existence" for the Tri-colored Bat and Monarch Butterfly. Potential impacts and reasons for the determinations are summarized below:

Northern Long-eared Bat: The Proposed Project will result in the loss of 17.5 acres of forested areas and 340 individual trees resulting from site development activities (grading, buildings, auto parking, access roads, and stormwater management areas). The forested areas are currently fragmented by roads and mowed paths and surrounded by an existing airport. These forested areas would not be considered ideal habitat for Northern Long-Eared Bat.

"Not Likely to Adversely Affect" determination on NLEB for the following reasons:

- NYSDEC data indicated that there are no documented summer occurrences within 1.5 miles of the project area, and there are no known hibernacula within 5 miles of the project.
- Tree clearing will not be completed within 0.25 mile of known hibernacula or within 150 feet of any known, occupied northern long-eared bat maternity roosts.
- Tree removal and clearing will be completed between November and February to avoid the species summer occupancy season.
- A significant amount of existing forested habitat and connective wildlife corridors will remain near the Project area (north and west contain 79 acres and east and south contain 436 acres).
- Results of USFWS IPaC Northern Long-eared Bat Rangewide Determination Key (Dkey), stated "the proposed action does not intersect an area where the Northern Long-eared Bat is likely to occur, based on the information available to U.S. Fish and Wildlife Service as of the most recent update of this key (**Appendix D**, pages D-343 to D-357).
- Duration of the construction period will be minimized to the extent possible.

Tricolored Bat: The Tricolored Bat is listed as a proposed endangered species. The Proposed Project will result in the loss of 17.5 acres of forested areas and 340 individual trees resulting from site development activities (grading, buildings, auto parking, access roads, and stormwater management areas). The forested areas are currently fragmented by roads and mowed paths and surrounded by an existing airport. These forested areas would not be considered ideal habitat for Tri-colored Bats.

"Not Likely to Jeopardize the Continued Existence" determination on Tri-colored Bats for the following reasons:

- NYSDEC data indicated that there are no documented summer occurrences within 1.5 miles of the project area, and there are no known hibernacula within 5 miles of the project.
- Tree clearing will not be completed within 0.25 mile of known hibernacula or within 150 feet of any known, occupied Tri-colored Bat maternity roosts.
- Tree removal and clearing will be completed between November and February to avoid the species summer occupancy season.
- A significant amount of existing forested habitat and connective wildlife corridors will remain near the Project area (north and west contain 79 acres and east and south contain 436 acres).
- Duration of the construction period will be minimized to the extent possible.

Monarch Butterfly: The Monarch Butterfly is listed as a proposed threatened species. The Proposed Project will result in the loss of 62.41 acres of mowed lawn / grassland areas resulting from site development activities (grading, buildings, auto parking, access roads, and stormwater management areas). The conversion of mowed lawn / grassland areas to paved areas will result in the loss of potential Monarch Butterfly habitat.

"Not Likely to Jeopardize the Continued Existence" determination on Monarch Butterfly for the following reasons:

- Approximately 30 acres of grassland areas will be preserved within the Project site boundary.
- Approximately 187.23 acres of new grassland habitat will be created.
- A significant amount of existing grassland habitat and connective wildlife corridors will remain near the Project area (250 acres).
- Duration of the construction period will be minimized to the extent possible.

A response letter received from the USFWS on April 25,2025 (**Appendix D**, pages D-405 to D-407) indicated the following:

- No further consultation is needed for the NLEB.
- Regarding the TCB, information provided on April 8, 2025, indicated that tree removal would occur between November 1and March 31 when bats are in hibernation to avoid direct effects to this species. It was noted that ample forest habitat occurs adjacent to the site and the removal of trees would not be detrimental to listed bats. USFWS concurred with the FAA determination of not likely to jeopardize the continued existence of the TCB with implementation of the identified conservation measures.
- The Monarch Butterfly may occur within the boundary of the project and is now proposed for listing. The FAA determined that the project is not likely to jeopardize the continued existence of the monarch butterfly. The Service agrees that the project is not likely to jeopardize the monarch butterfly. Please note that if the monarch butterfly (or the TCB) is federally listed before the project is complete and the project "may affect" the species, then the FAA will need to consult with the Service at that time.
- No further coordination or consultation under the ESA is required with the Service for this project at this time. Should project plans change, or if additional information on listed or proposed species or critical habitat becomes available, this determination may be reconsidered. Until the Proposed Project is complete, we recommend that you check our website regularly from the date of this letter to ensure that listed species presence/absence information for the proposed.

State Protected Species

Whorled Mountain Mint: Construction activities are not proposed near the documented location (¼ mile west of the Project area) and will not have a direct impact to the species or its habitat. Proper best management practices (BMPs) and erosion and sediment controls will be used throughout construction to avoid erosion and silt laden sediment runoff into surrounding habitat. Therefore, there will be no impact.

Northern Ground Cedar: Construction activities are not proposed near the documented location (½ mile south of the Project area) and will not have a direct impact to the species or its habitat. Proper BMPs and erosion and sediment controls will be used throughout construction to avoid erosion and silt laden sediment runoff into surrounding habitat. Therefore, there will be no impact.

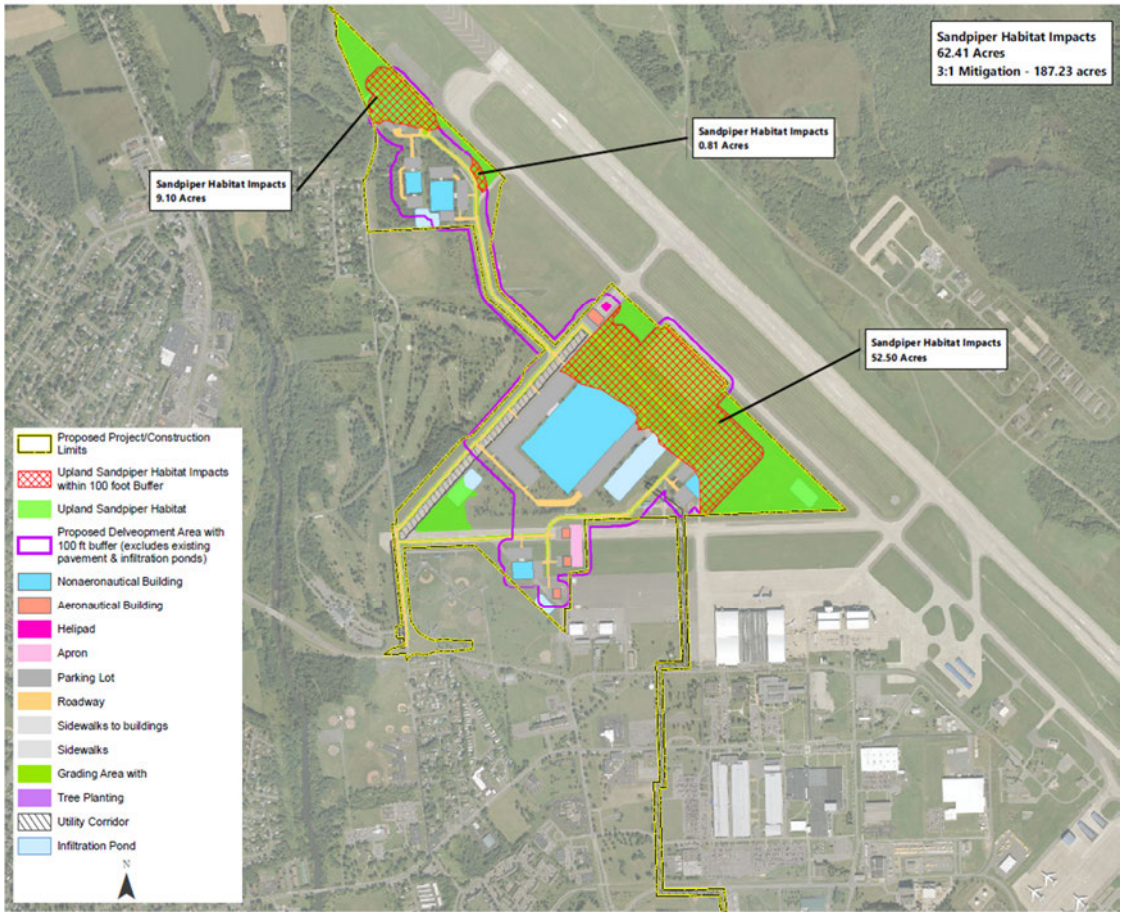
Upland Sandpiper: Construction of roads, automobile parking areas, buildings, at full build-out will result in the permanent loss of 62.41 acres of breeding/nesting and foraging habitat used by the Upland Sandpiper. **Figure 4.5** shows Upland Sandpiper habitat impacts, and the required mitigation ratio approved by the NYSDEC in email correspondence dated December 15, 2023 (**Appendix F**, page 133).

Migratory Birds

Breeding/nesting habitat for nine of the 11 identified migratory birds is present in the Project area (**Table 4.6**). Quality habitat is important for migratory birds during breeding season. If that habitat is destroyed or

disturbed during the breeding season, nests may be lost or abandoned or productivity may be reduced, which can lead to population declines.

Figure 4.5 – Upland Sandpiper Habitat Impacts & Required Mitigation Ratio



Source: C&S Engineers, Inc.

4.3.3 Avoidance, Minimization, & Mitigation

The Proposed Project incorporates specific measures to minimize effects on vegetative communities, wildlife, migratory birds and federally protected species, and avoidance, minimization, and mitigation measures to compensate for the loss of 62.41 acres of Upland Sandpiper habitat (state listed Threatened and Endangered species). The measures recommended for the Upland Sandpiper were developed based on agency coordination, field visits, and meetings held with the NYSDEC, NYNHP, FAA, and Oneida County (**Table 4.5**).

Vegetative Communities, Wildlife, Migratory Birds, & Federally Protected Species

Minimization Measures

The following mitigation measures are recommended to minimize effects on vegetative communities, wildlife, migratory birds, and federally protected species:

- All tree removal and clearing will be done between November 1st through March 31st to avoid threatened and endangered species and migratory bird breeding/nesting seasons.
- Proper BMPs and erosion and sediment controls will be used throughout construction to avoid erosion and silt laden sediment runoff into surrounding habitat, streams, wetlands located offsite.

- All construction vehicle/equipment access routes in grassland habitat will be demarcated with construction fence and/or silt fence to keep potential nesting birds out of access routes; access routes located in grassland habitat will be installed and removed outside the breading season to avoid impacts to nesting species; haul routes will be restored to pre-construction conditions at the end of construction activities.
- Minimize the duration of the construction period to the extent possible.

State Protected Species

Avoidance Measures

Avoidance is the first step in implementing mitigation. Avoidance means adverse impacts are avoided altogether through alteration of project location, design, or other related aspects. The Upland Sandpiper is known to be present at the Airport due to the large areas of maintained/mowed lawn. The Proposed Project takes place within a large "triangle area" that is currently undeveloped. Development of this area is a focus of Oneida County due to the lack of large developable land parcels in the County and the ongoing interest expressed by developers. No feasible development parcels under the control of Oneida County exist other than at the Airport site. Avoidance measures recommended include the following:

- Approximately 30 acres contained within the Proposed Project limits will remain undeveloped and be preserved as grassland areas (**Figure 4.1**).
- Stormwater management areas located within the preserved grassland areas will be installed underground and restored to grassland areas.
- Construction of the site access road will take place outside of the breeding season to avoid impacts to Upland Sandpiper (i.e., outside April 23rd – August 15th timeframe)

Minimization Measures

Minimization is the reduction of all unavoidable impacts to the maximum extent practicable. Minimization actions may include making a roadway improvement footprint smaller or rearranging the way a project is designed to make the impact area smaller. The following measures are recommended to minimize impacts to Upland Sandpipers:

- Show preserved grassland habitat areas on site development plans.
- Maintain current mowing schedule in preserved grassland areas.
- Mark preserved grassland areas with surveyor's flags and/or silt fence prior to construction activities nearby.
- Limit the location of temporary access roads and vehicle traffic within the existing Project area to the extent possible

Compensatory Mitigation Measures

Compensatory mitigation is recommended for the loss of the 62.41 acres of Upland Sandpiper habitat. Compensatory mitigation can include enhancement, restoration, or creation. Enhancement is considered a mitigation activity that improves the size or function of degraded or other existing Upland Sandpiper habitat. Restoration is considered a mitigation activity that re-establishes a former Upland Sandpiper habitat. Creation is considered a mitigation activity that results in the formation of new Upland Sandpiper habitat. Compensatory mitigation measures will require a 3:1 impact ratio (i.e., 62.41 acres of habitat x 3 = 187.23 acres of equivalent habitat to be created). Compensatory mitigation measures that are recommended include the following:

- Create new Upland Sandpiper habitat on four County-owned parcels (tax parcels 290.000-2-46, 290.00-2-50, 303-2-1.1, and 303.000-1-10.1). These parcels can accommodate approximately 192.96 acres of new habitat (**Figure 4.6**).
- Removal of 80.08 acres of vegetation on tax parcels 290.000-2-46, 290.00-2-50, and 303.000-1-10.1

Exsiting Potential Upland Sandpiper Habitat	Potential Upland Sandpiper Habiat if Cleared of Vegetation
Tax Parcel 290.000-2-46: Oneida County	
45.39 Acres (Ground Elevations - 635 ft - 720 ft)	67.46 Acres (Ground Elevations - 635 ft - 720 ft)
Tax Parcel - 290.00-2-51: Oneida County	
11.86 Acres (Ground Elevations - 645 ft - 685 ft)	1.53 Acres (Ground Elevations - 640 ft - 675 ft)
Tax Parcel - 303.000-1-10.1: Oneida County	
4.53 Acres (Ground Elevations - 640 ft - 660 ft)	11.09 Acres (Ground Elevations - 640 ft - 670 ft)
Tax Parcel - 303-2-1.1: Oneida County	
9.06 Acres (Ground Elevations - 650 ft - 675 ft)	---
Tax Parcel 303.000-2-2: Donna Thrasher	
42.04 Acres (Ground Elevations - 590 ft - 655 ft)	---
Total Acreage: 112.88	**Total Acreage: 80.08**

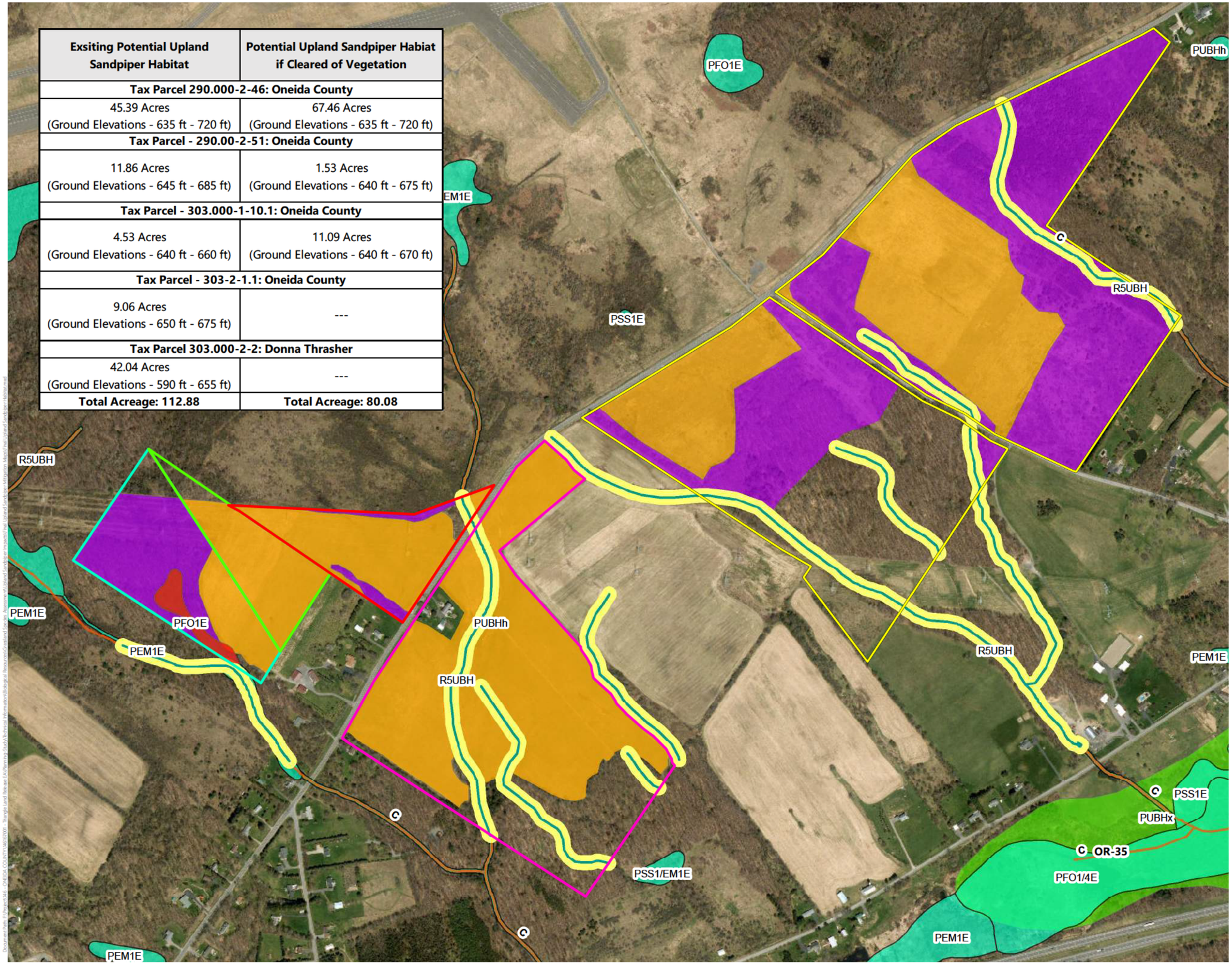


Figure 4.6

Potential Upland Sandpiper Habitat Mitigation Plan

- Tax Parcel 303.000-2-2
- Tax Parcel 290.000-2-46
- Tax Parcel - 290.00-2-50
- Tax Parcel - 303.-2-1.1
- Tax Parcel - 303.000-1-10.1
- Potential Upland Sandpiper Habitat if Cleared
- Potential Upland Sandpiper Habitat if Cleared/No Grubbing
- Existing Streams
- Existing 50 ft Stream Buffer
- Existing Potential Upland Sandpiper Habitat
- NYSDEC Streams
- USFWS NWI Mapped Wetlands
- NYSDEC Freshwater Wetlands

N

0 300 600 1,200 Feet

1 in. = 600 ft.

When printed at 11 in. by 17 in.

EA for Land Release and Airport Business Park Development

Sources: ESRI World Street Base Map; City of Rome, Oneida County, & NYS from USCB TIGER; Created by C&S Engineers, Inc.

- Habitat conversion will be established as part of the Part 182 Permit
- Proposed seed mix for cleared and grubbed areas will be provided by the NYSDEC.
- Removal of 1.8 acres of trees in federal wetlands will include cutting trees and grinding stumps to the ground with no soil disturbance; this will convert a forested wetland to an emergent wetland.
- Establish permanent conservation easements over areas preserved for new habitat.
- Acquire a permanent conservation easement on one privately owned parcel totaling 42 acres (tax parcel 303.000-2-2) (**Figure 4.6**)
- Area will continue to be farmed for hay crops only and seasonal mowing schedule outside of breeding season will be maintained.
- Proposed conservation easements will be in place prior to construction activities taking place.
- Upland Sandpiper mitigation plan will be developed based on NYSDEC recommendations and standards.
- SWPPP will be obtained prior to construction activities taking place.
- Implement vegetation management plan:
    - Baseline assessment of existing conditions at mitigation area/s
    - Mowing and vegetation management to create/retain grasslands of various heights.
    - Vegetation monitoring to make sure forested wetland that was converted to emergent/wet meadow does not succeed into a scrub shrub wetland cover type.
    - No mechanized equipment within managed areas during the breeding/nesting seasons
    - Additional maintenance mowing to maintain grassland habitat and prevent encroachment of woody vegetation.
- Implement mitigation monitoring program:
    - Establish objectives for mitigation and corresponding measurement methods.
    - Identify performance standards to evaluate mitigation success.
    - Annual monitoring and reporting based on NYSDEC requirements.

4.3.4 Significance Threshold and Conclusions

According to Exhibit 4-1 of FAA Order 1050.1F, FAA's significance threshold for biological resources is when the USFWS or the National Marine Fisheries Service determines that the action would be likely to jeopardize the continued existence of a federally listed threatened or endangered species or would result in the destruction or adverse modification of federally designated critical habitat. The FAA has not established a significance threshold for non-listed species.

In addition to the threshold above, Exhibit 4-1 of FAA Order 1050.1F provides additional factors to consider in evaluating the context and intensity of potential environmental impacts for biological resources.

- A long-term or permanent loss of unlisted plant or wildlife species, i.e., extirpation of the species from a large Project area (e.g., a new commercial service airport)
- 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.
- Substantial loss, reduction, degradation, disturbance, or fragmentation of native species' habitats or their populations
- 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.

Given the information included above no significant adverse impacts to wildlife, migratory birds, or federally listed threatened and endangered species are expected since additional habitat is located nearby that wildlife species can migrate to and seasonal restrictions on clearing or mowing vegetation will be implemented.

Additionally, no significant adverse impacts to state-listed threatened and endangered species (Upland Sandpiper) are expected with the implementation of the recommended avoidance, minimization, and compensatory mitigation measures listed above. Oneida County will continue further coordination with the NYSDEC and the NYNHP during the design and permitting phases of site development activities.

4.4 Water Resources

4.4.1 Affected Environment

Wetlands

Jurisdictional wetlands and waters of the United States (including Traditional Navigable Waters) are regulated under Sections 401 (water quality certification) and 404 of the Clean Water Act (CWA) for the discharge of dredged or fill materials. Traditional Navigable Waters and associated wetlands are also regulated under Section 10 of the 1899 Rivers and Harbors Act. In addition to these federal regulations, federal agency actions that affect wetlands are also addressed under Executive Order 11990. Federal agencies must document their efforts to avoid and minimize impacts to wetlands through the NEPA process.

Based on a review of the New York State Department of Environmental Conservation (NYSDEC) Environmental Resource Mapper (ERM) state regulated wetlands and associated 100-foot buffer areas are located within or adjacent to the Project area[22]. Based on a review of the U.S. Fish and Wildlife Service (USFWS), National Wetlands Inventory (NWI) map, wetlands and streams are located adjacent to the Project area[23]. Therefore, the NYSDEC and U.S. Army Corps of Engineers (USACE) regional offices were contacted.

A response was received from Steven Metivier, USACE, dated June 4, 2021, that stated *"I have reviewed the proposed development area and do not see any evidence that there may be waters of the US at this location. However, I recommend that a trained biologist review the area for potential presence of wetlands/waters regulated by the Corps. If the proposed work would result in a discharge of dredged or fill material into waters of the US, a Corps permit may be required"* (**Appendix D**, page D-56).

A response received from the NYSDEC, dated September 6, 2021, stated "*there are NYS Regulated Freshwater Wetlands and regulated buffer areas within the project vicinity. Specifically, NYS Regulatory Freshwater Wetland RO-42 is in close proximity to the proposed "50-foot Utility Corridor" in the area near the existing substation. Any wetland directly connected to the mapped portion of RO-42 is subject to Article 24 regulation. Any such wetlands must be delineated and showed on the plans. Any disturbance within 100-feet of the delineated wetland boundary may require an Article 24 Freshwater Wetlands Permit from DEC"* (**Appendix D,** page D-114).

As a result of the information provided by the NYSDEC and USACE, a Wetland and Waterway Delineation was conducted on June 10, 2021, August 15, 2022, and September 20, 2022, to determine the presence or absence of federal and state wetlands and/or streams in or adjacent to the Project area (**Appendix M**, pages M-1 to M-50). Two wetlands, totaling 0.39 acres were delineated within or near the Project area (**Figure 4.7**).

Wetland A and Wetland B (also referred to as "RO-42") are palustrine emergent (PEM) wetland features. As shown on **Figure 4.7**. Wetlands A and B are potentially regulated waters of the United States afforded

[22] Environmental Resource Mapper (ny.gov) accessed 4-21-24
[23] National Wetlands Inventory (usgs.gov) accessed 4-21-24

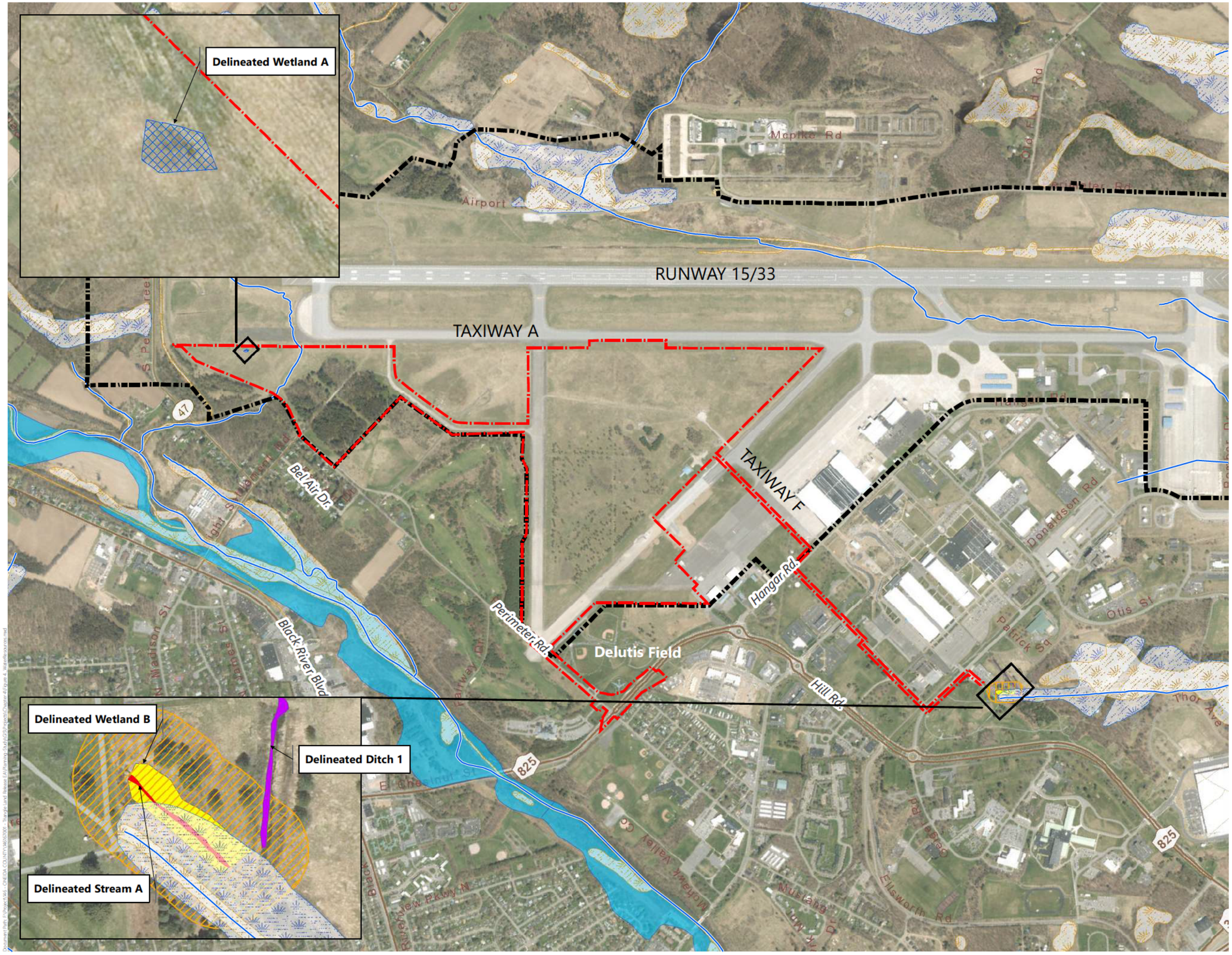


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Figure 4.7

Water Resources

- Proposed Project Area/ Construction Limits
- Airport Property
- NYSDEC Mapped Streams
- USFWS (NWI) Mapped Wetlands
- NYSDEC Mapped Wetlands
- C&S USACE Delineated Wetlands
- C&S USACE/NYDEC Delineated Wetlands
- NYSDEC 100ft Adjacent Area
- C&S Delineated Perennial Streams
- C&S Delineated Ditches
- 100 Year Floodplain

N

0 700 1,400 2,800 Feet

1 in. = 1,200 ft.
When printed at 11 in. by 17 in.

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Sources: 2020 Aerial; Parcels from Oneida County; Source: Flood Insurance Rate Map (FIRM), City of Rome, Maps 36065C0556F and 36065C0559F, September 2013, USFWS National Wetlands Inventory Website, August 2014.
Created by C&S Engineers, Inc., 2022

Date Saved: 4/8/2024 9:39:01 AM

protection under Section 404 of the Clean Water Act**. Table 4.7** provides a description and acreages of wetlands located in the Project area.

Table 4.7 – Delineated Wetlands in or adjacent to the Project area

Wetland / Stream ID	Description	Agency Jurisdiction	Total Delineated Size (acres)
Wetland A	Palustrine emergent wetland	USACE	0.07
Wetland B (NYSDEC Wetland RO-42)	Palustrine emergent wetland	USACE/NYSDEC	0.32
Total			0.39 Acres

Source: Wetland & Waterway Delineation Report, C&S Engineers, Inc., August 2023

In addition to the delineations noted above, a wetland and waterway resource screening was also conducted on February 7, 2024, for noise barrier and a traffic roundabout within the Project area. The field investigation did not identify any federal or state wetlands or surface waters within these areas (**Appendix M**, page M-51). The Proposed Project will avoid Wetland A because this area has been identified as preserved grassland area for Upland Sandpipers (**Figure 4.1**). In addition, the proposed utility corridor was relocated west of the electrical substation to avoid development activities taking place on or near Wetland B. Therefore, **no impact** to wetlands is expected.

Floodplains

Executive Order 11988 defines floodplains as the "lowland and relatively flat areas adjoining inland and coastal waters, including flood prone areas of offshore islands, including at a minimum, the area subject to a one percent or greater chance of flooding in a given year." The intent of Order 11988 is to ensure that floodplains and floodways are kept clear of obstructions and facilities that could restrict or increase flow rates or volumes during flood conditions. Encroachment is defined as any action that would cause the 100-year water surface profile to rise by one foot or more. The 100-year floodplain has been adopted by the Federal Emergency Management Agency (FEMA) as the base flood for floodplain management. Both Federal and state laws regulate development within floodplains and floodways.

Based on a review of the FEMA Flood Insurance Rate Map (FIRM) for the airport (Map Number 36065C0556F effective date: September 27, 2013), the Project area is not located within a 100-year or 500-year floodplain boundary (**Figure 4.7**). Therefore, there will be **no impact**.

Surface Waters

Surface waters are regulated under Sections 303(d) of the Clean Water Act (CWA) for impaired waters that do not meet water quality standards; Sections 401 (water quality certification) and 404 of the Clean Water Act (CWA) for the discharge of dredged or fill materials, and Section 402 establishes the National Pollutant Discharge Elimination System (NPDES) permit program.

Streams: The water quality of surface waters in New York State are classified by the NYSDEC as either "AA", "A", "B", "C", or "D" based on existing or expected best usage, which also determines the protection status (**Table 4.8).** A "T" used with the classification indicates that the stream supports, or may support, a trout population. All streams and water bodies with a classification of C(T) or higher are regulated by the NYSDEC.

Table 4.8 - NYS Classification of Waters

Classification	Best Usage
AA, A	Drinking source
B	Swimming and other recreation, not suitable for drinking
C	Fisheries, non-contact activities
D	Fishing
*(T), (TS)	Waters with classification AA, A, B, and C may also have a standard of (T), indicating that it may support a trout population, or (TS), may support trout spawning. Special requirements apply to sustain these waters that provide valuable and sensitive fisheries resources

Source: NYS DEC Protection of Waters Program, https://www.dec.ny.gov/permits/6042.html

As noted in the Wetland and Waterway Delineation Report, no non-relatively open waterways (RPWs) or open waters were identified within the Project area. One stream (Stream A) and one ditch were identified south and southeast of the Project area (**Figure 4.7**). Stream A is associated with a NYSDEC mapped stream, an unnamed tributary of Erie Canal, which is a Class C with C standards surface water that is encompassed by NYSDEC wetland RO-42. The ditch is intermittent and not a relocated tributary. As such, these features are not regulated under Section 404 of the Clean Water Act, and not subject to NYSDEC jurisdiction. **Table 4.9** provides a description of streams and ditches and acreages of features located adjacent to the Project area.

The proposed utility corridor was relocated west of the electrical substation to avoid development activities taking place near Stream A and the ditch. Therefore, **no impact** to streams is expected.

Table 4.9 – Delineated Streams and Ditches Adjacent to Project area

Stream/ Ditch ID	Description	Agency Jurisdiction	Total Delineated Size (acres)	Total Delineated Length (feet)
Stream A	Stream A is associated with a NYSDEC mapped stream, an unnamed tributary of Erie Canal (Class C with C standards), is considered a protected stream by NYS standards, and is potentially a regulated water of the US afforded protection under Section 404 of the CWA.	USACE/NY SDEC	0.04	245
Ditch 1	Ditch 1 connects to Wetland B and Stream A. Ditch 1 is intermittent and is not relocated tributary. Therefore, Ditch 1 is not protected at the federal level	NA		503
Total			0.04 Acres	748 feet

Source: Wetland & Waterway Delineation Report, C&S Engineers, Inc., August 2023

Drainage & Stormwater: A Drainage Study was conducted by C&S Engineers, Inc. to evaluate the existing drainage conditions within the Project area to provide a planning-level analysis of the new stormwater management practices that might be required as part of the implementation of the Proposed Project (**Appendix N**).

The Project area was broken into eight individual drainage areas based on existing topography and the underground drainage system[24]. The Drainage Study identified three outfall points with general surface runoff flows overland from the northwest to the southeast (**Appendix N**, pages N-7 to N-8 and N-15). Drainage Area 1 is in the northwest portion of the Project area and flows overland from the northwest to the southwest to a low point that ultimately discharges into the Mohawk River. Drainage Area 2 is in the northwestern portion of the Project area and flows overland to a large open and flat vegetated area north of the Mohawk Glen Golf Course. Drainage Area 3 is in the "Triangle Area" of the Project area and flows northwest to the southeast towards a series of catch basins and reinforced concrete pipes (RCP) that run parallel and adjacent to Taxiway A, Taxiway B (closed portion), and Taxiway E. Drainage Area 3 ultimately discharges into the Mohawk River.

Groundwater Resources

The Safe Drinking Water Act (40 CFR parts 141-149) prohibits federal agencies from funding actions that would contaminate an EPA-designated sole source aquifer or its recharge area. Based on a review of the USEPA's interactive map of sole source aquifers the Airport is not located within a sole source aquifer region.[25] A review of the NYSDEC Primary and Principal Aquifers in New York State map[26] indicates the Airport overlies an unconfined principal aquifer, yielding between 10 - 100 gallons per minute. NYSDEC defines principal aquifers as "aquifers known to be highly productive or whose geology suggests abundant potential water supply, but which are not intensively used as sources of water supply by major municipal systems at the present time."

The Proposed Project is not located over a sole source aquifer, the groundwater at the Griffiss International Airport is not used as a drinking supply, and construction activities would not involve ground disturbance below 5 feet (groundwater in the area is at a depth of 9 feet). Therefore, there will be **no impact** to groundwater.

Wild and Scenic River

The Wild and Scenic Rivers Act (PL 90-542, as amended) was implemented to facilitate the protection of rivers possessing "outstandingly remarkable scenic, recreational, geological, fish and wildlife, historic, cultural, or any other similar values." The US Department of the Interior (DOI) maintains a national inventory of river segments that appear to qualify for inclusion in the National Wild and Scenic River System.

Based on a review of the National Park Service Wild and Scenic Rivers Program website[27], there are no federally designated wild and scenic rivers on or adjacent to Airport property. In addition, based on a review of the NYSDEC website, there are no state-designated wild, scenic, or recreational rivers on or adjacent to Airport property. Therefore, there will be **no impact** to wild and scenic rivers.

4.4.2 Environmental Consequences

No-Action Alternative

No development occurs with this alternative. Therefore, no impacts to water resources are expected.

[24] The drainage study did not include utility corridors and other undeveloped areas as they are temporary disturbance that do not introduce an increase in impervious area and/or runoff.
[25] USEPA. Interactive Map of SSAs. Accessed on: March 4, 2024. Available at: https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b
[26] USGS. Unconsolidated Aquifers in Upstate NY. [Online]. Accessible at: https://ny.water.usgs.gov/projects/bgag/aquifer.maps/aquifer1.maps.html
[27] National Wild and Scenic Rivers System. Accessed 3/4/24. Accessible at: https://www.rivers.gov/

Proposed Project

Surface Waters

Stormwater: stormwater runoff impacts are typically related to an increase in impervious or paved surfaces and the loss of groundcovers that reduce runoff, filter out suspended soil particles, and recharge groundwater. As land development increases, runoff discharges to surface waterbodies more quickly and for a longer period. Because of this change in volume, rate, and duration, surface waterbodies may be unable to convey the increased flow downstream, which may lead to flooding of nearby areas. In addition, increased flow rates and velocities in waterbodies may lead to erosion of stream channels and increased pollution entering waterbodies.

The total impervious area associated with the Proposed Project would increase from 45.57 acres to 113.6 acres because of construction activities for access roads, roadway improvements (traffic roundabout, realignment of Perimeter Road), automobile parking areas, aircraft parking apron, and new buildings. Approximately 40% of the entire 286-acre site would be impervious surfaces with the remaining 60% of the site remaining undeveloped.

Stormwater runoff from the newly created impervious areas will be contained onsite through the construction of stormwater management infrastructure (i.e., stormwater drainage basins, dry swales, and installation of new drainage pipes). **Appendix N** (page N-19) includes a proposed drainage area plan that identifies proposed storm drainage piping, infiltration basins, and drainage outfall points. Based on the results of the Drainage Study five new stormwater management areas will be constructed ranging in size from 43,000 SF to 262,226 SF (**Figure 4.1**). Comparison of existing and proposed peak flow rates for the overall development area with incorporation of the proposed stormwater management infrastructure indicates no increase in peak flow discharge rates overall or per drainage area (**Appendix N**, page N-12).

The Proposed Project also includes the removal of 17.5 acres of vegetation and 340 individual trees that can lead to an increase in stormwater runoff. Trees are importance in managing runoff because their leaf canopies help reduce erosion caused by falling rain, they provide surface area where rainwater lands and evaporates and their roots take up water and help create conditions in the soil that promote infiltration, thereby reducing runoff.

Erosion and Sedimentation: The Proposed Project will involve the removal of trees and other vegetation that can lead to erosion of soil and sedimentation When trees are removed it can result in reduced base flows in streams, increase flooding, and lower water quality. During construction activities construction vehicles tracking soil onto the roadways can temporarily increase the potential for soil erosion, causing a potential increase in suspended solids in runoff and local receiving waters which can temporarily degrade water quality. Additionally impacts could occur from contaminated stormwater runoff due to potential leaks or spills of fuel or hydraulic fluid used in construction equipment or outdoor storage of construction materials that are commonly used in construction.

Drainage Patterns: The Proposed Project will require new or improved drainage infrastructure to accommodate additional surface runoff related to construction of impervious surfaces (access roads, roadway improvements, automobile parking areas, aircraft parking apron, and new buildings). Based on the Drainage Study, surface runoff will continue to follow the existing drainage patterns with the total overall proposed drainage area equal to the existing drainage area. The existing three outfall points will continue to be used and recommended improvements include the installation of new corrugated polyethylene (HDPE, Type S) pipes ranging in size from 12 inches to 36 inches. The HDPE pipes will be interconnected by a series of precast concrete catch basins. The proposed HDPE drainage pipe system will be connected to the existing RCP drainage pipes, utilizing existing outfall. Portions of the existing underground drainage system will likely be demolished and/or abandoned as part of the proposed development plan (**Appendix N**, page N-9).

4.4.3 Mitigation

The following mitigation measures are proposed to minimize impacts to wetland and surface water resources.

- Approximately 8.5 acres of trees will be preserved to maintain a visual screen/buffer between residential properties and site development.
- Preserve vegetation if not needed for site development activities (i.e., individual trees, small patches of tree areas)
- Preparation of a Stormwater Pollution Prevention Plan.
- An Analysis of pollution burden on disadvantaged communities (DACs) and preparation of an Existing Burden Report may be required by NYSDEC in compliance with the newly enacted state law as part of the SPDES permitting process.
- BMPs will be followed to avoid accidental spills of fuel oils, chemicals, concrete leachate, and sediments into aquatic habitats. These practices include proper storage, use, and cleanup of all construction-related chemicals. Erosion and sediment control features may include silt fences, straw bales, hydroseeding of exposed soils, and mulching.
- Construction entrances and exits will be stabilized to prevent tracking onto roadways.
- Disturbed areas will be restored to prevent soil erosion following completion of construction activities.
- Periodic cleaning of soil erosion and sediment control features.
- If the Proposed Project has not been constructed by January 2025, NYSDEC may perform an additional review of the Project to determine whether any additional waters within the Project area take on a jurisdictional status as a result of an amendment in the NYS 2022-2023 budget (Part Q) expanding the protection provided to New York's freshwater wetlands (ECL Article 24).

- NYSDEC SPDES General Permit for Stormwater Discharges from Construction Activity (Permit No. GP-0-20-001) will be obtained. This will include preparation of a Stormwater Pollution Prevention Plan (SWPPP).
- Installation of stormwater management areas (**Exhibit 4.1**)
  - Stormwater runoff will be conveyed to the infiltration basins via an underground drainage pipe network and overland flow via sheet flow and vegetated swales.
  - The infiltration basins will be a graded/excavated depression located in the naturally low-lying area of the site (6 ft max basin depth) sized to adequately store and infiltrate the design storm.
  - Underlying soils must have a minimum infiltration rate to promote stormwater infiltration into the surrounding soils (0.5 in/hr) and there must be adequate separation from the seasonal high groundwater table elevation.
  - The infiltration basins will be designed to fully drain within 48 hours of the maximum storm event for which they are designed.

Exhibit 4.1 – Above Ground Infiltration Basin

Infiltration Basin (I-2)

Infiltration basins are vegetated excavations designed to capture and temporarily store stormwater runoff to promote infiltration into the surrounding native soils.

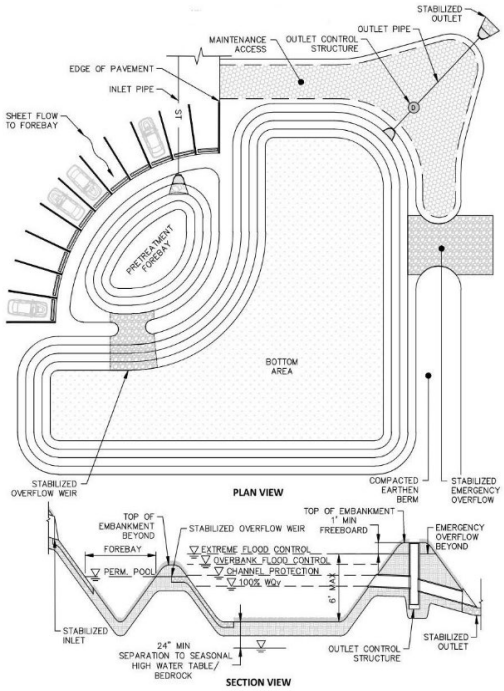
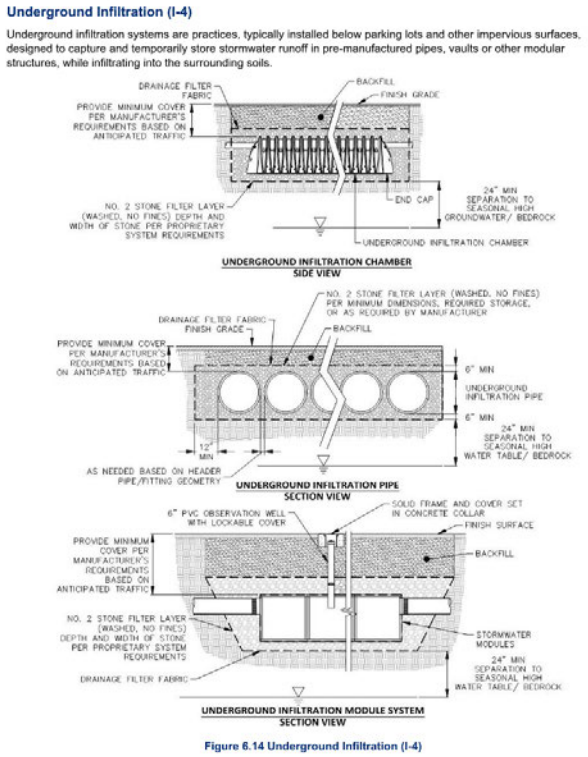


Figure 6.12 Infiltration Basin (I-2)

- An outlet control structure (modified manhole or catch basin) with an outlet pipe and emergency spillway (graded riprap depression/weir in basin bank) will be included in the event the inflow exceeds the storage capacity of the basin during larger storm events.
- The infiltration basins will be stabilized/vegetated with a native seed mix.

- Installation of underground stormwater management areas (**Exhibit 4.2**)
  - Stormwater runoff will be conveyed to the underground infiltration chambers via an underground drainage pipe network and overland flow via sheet flow and vegetated swales.
  - The underground infiltration chambers are typically made up of a series of corrugated high density polyethylene pipe (HDPE) chambers that are sized to adequately store and infiltrate the design storm. The HDPE pipe chambers are cover in and underlined by a stone filter layer and geotextile drainage fabric.
  - Underlying soils must have a minimum infiltration rate to promote stormwater infiltration into the surrounding soils (0.5 in/hr) and there must be adequate separation from the seasonal high groundwater table elevation.
  - The infiltration basins will be designed to fully drain within 48 hours of the maximum storm event for which they are designed.

Exhibit 4.2 – Underground Infiltration Basin



Source: NYSDEC Stormwater Management Design Manual

- An outlet control structure (modified manhole or catch basin) with an outlet pipe and emergency outlet pipe will be included in the event the inflow exceeds the storage capacity of the basin during larger storm events.
- The underground stormwater infiltration basins can be located below paved traffic areas and otherwise used when space constraints are present.

4.4.4 Significance Threshold and Conclusions

Exhibit 4-1 of FAA Order 1050.1F provides significance thresholds for wetlands. A significant impact exists if the action would:

- Adversely affect a wetland's function to protect the quality or quantity of municipal water supplies, including surface waters and sole source and other aquifers
- Substantially alter the hydrology needed to sustain the affected wetland system's values and functions or those of a wetland to which it is connected.
- Substantially reduce the affected wetland's ability to retain floodwaters or storm runoff, thereby threatening public health, safety, or welfare (the term welfare includes cultural, recreational, and scientific resources or property important to the public)
- Adversely affect the maintenance of natural systems supporting wildlife and fish habitat or economically important timber, food, or fiber resources of the affected or surrounding wetlands
- Promote development of secondary activities or services that would cause the circumstances listed above to occur.
- Be inconsistent with applicable state wetland strategies.

Exhibit 4-1 of FAA Order 1050.1F also provides significance thresholds for surface waters and groundwater. A significant impact exists if the action would:

- Exceed water quality standards established by Federal, state, local, and tribal regulatory agencies.
- Contaminate an aquifer used for public water supply such that public health may be adversely affected.

General, impacts to wetlands, surface waters, groundwater, and water quality will be minimized below significant impact thresholds with the incorporation of the mitigation measures outlined above, development of a soil erosion and sediment control plan consistent with FAA Advisory Circular 150/5370-10H, *Standards for Specifying Construction of Airports,* and adherence to design standards, inspection and quality control during construction. As a result, there will be no significant impacts to wetlands, surface waters, floodplains, groundwater, or water quality.

4.5 Coastal Resources (coastal zones and barriers)

Based on a review of the USFWS Coastal Barrier Resources System (CBRS) Mapper[28], the Project area is not located within, or in the vicinity of a CBRS Buffer Zone, a CBRS Prohibition, a CBRS system unit, or an otherwise protected area. In addition, based on review of the New York State (NYS) DOS, Coastal Atlas Mapper[29], the Project area is not located within a Coastal Zone boundary; therefore, there will be **no impact**.

4.6 Historic, Architectural, Archeological, & Cultural Resources

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by

[28] USFWS, Coastal Barrier Resources System Mapper. Accessed on January 16, 2024. Available at: https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/

[29] NY DOS, Coastal Atlas Mapper. Accessed on January 16, 2024. Available at: Coastal Atlas | New York Geographic Information Gateway (arcgis.com)

Section 106 is outlined in regulations issued by the ACHP. Revised regulations, Protection of Historic Properties (36 CFR Part 800), became effective January 11, 2001.

4.6.1 Affected Environment

Archeological & Cultural Resources

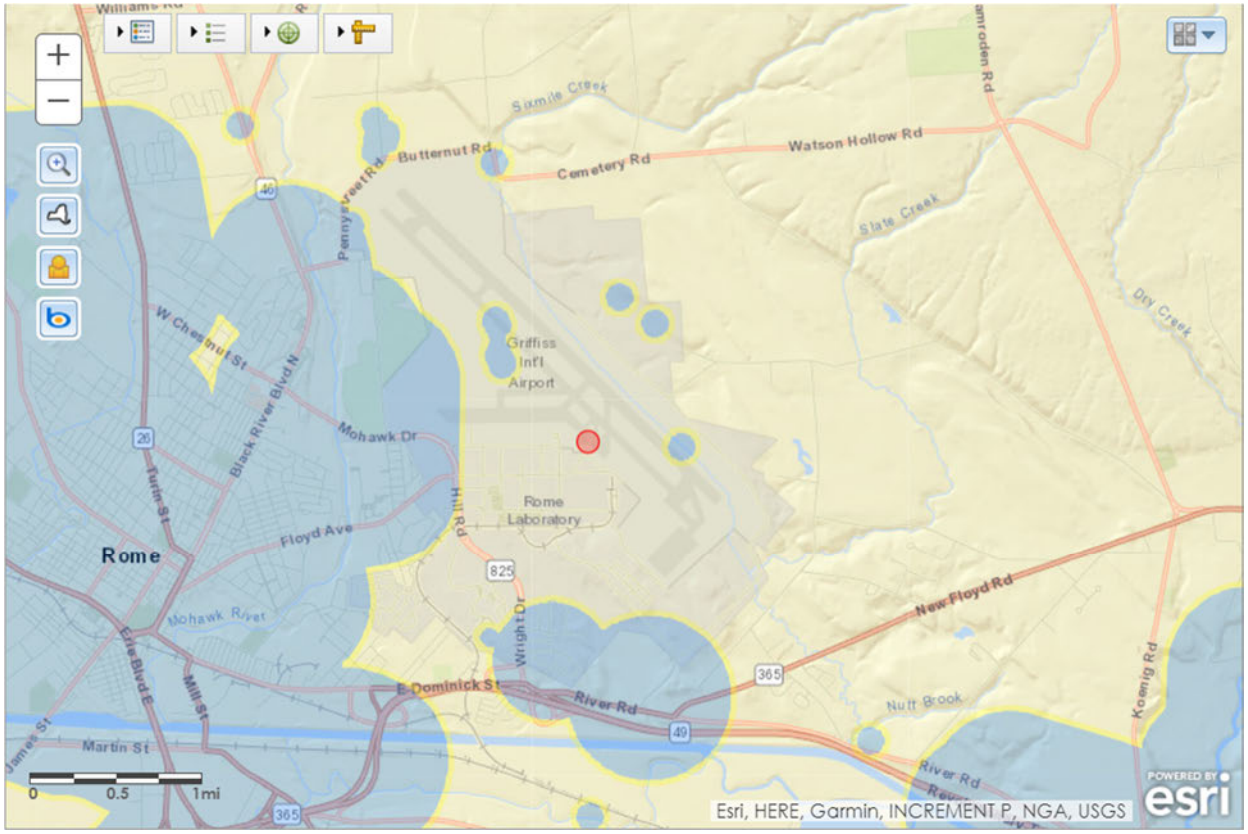
The New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP) Cultural Resource Information System (CRIS) was reviewed. The CRIS indicates that archeologically sensitive areas are located within or adjacent to the Project area (**Figure 4.8**).

Changes to the Project area or Area of Potential Effect (APE) took place several times based on agency coordination, potential environmental impacts, results of specialized studies (preliminary design), and the addition/refinement of project elements (utility corridors, traffic roundabout, and noise barrier). This required further coordination with NYS Office of Parks, Recreation and Historic Preservation (OPRHP) and additional archeological studies/surveys. These efforts have been summarized below.

June 2021

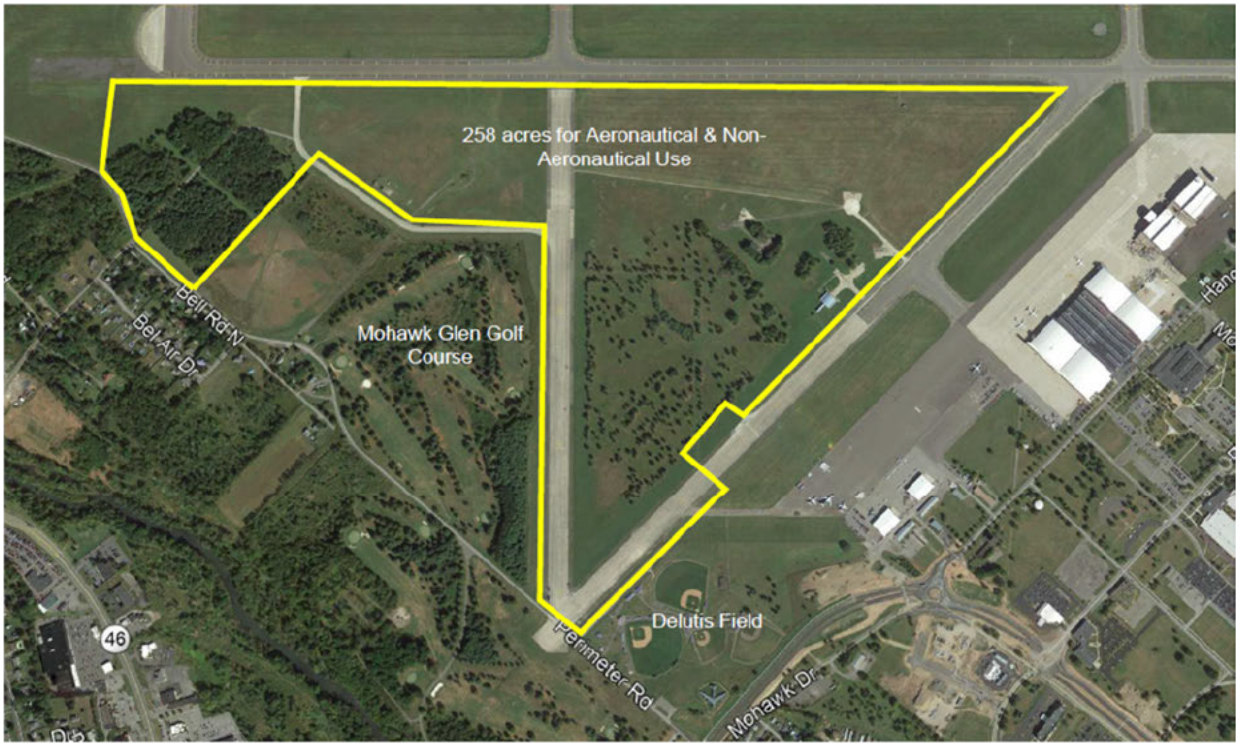
Since the NYS CRIS identified numerous archeologically sensitive areas within and adjacent to the Project area, a request for information for the initial Area of Potential Effect (APE) shown on **Figure 4.9** was submitted to the NYS OPRHP on June 3, 2012 (**Appendix D**, pages D-246 to D-254).

Figure 4.8 – NYS Archeologically Sensitive Sites



Source: NYS CRIS accessed 1-15-24

Figure 4.9 – Initial APE Limits



Source: C&S Engineers, Inc.

July 2021

A response letter from the NY State Historic Preservation Office (SHPO) dated July 15, 2021, indicated they have "no concerns regarding the proposed developments potential to affect historic architectural resources". However, "there are three archeological sites within the Project area that have been recommended as eligible for listing in the NYS and National Register of Historic Places (NRHP) (Appendix D, pages D-255 and D-256). NYSHPO identified the sites as PCI Site #16, PCI Site #18, PCI Site #19, and PCI Site #24 but noted that Site #18 and #19 were combined into a single archeological site based on the results of NYSHPO Report No. 96SR62601. **Table 4.10** summarizes the archeological site names and their corresponding SHPO site numbers. NYSHPO recommended the proposed development avoid physical disturbance of the sites. If disturbance cannot be avoided, NYSHPO indicated that a Data Recovery Plan for Phase 3 archeological investigation to mitigate adverse effects would be required.

Table 4.10 Archeological Sites

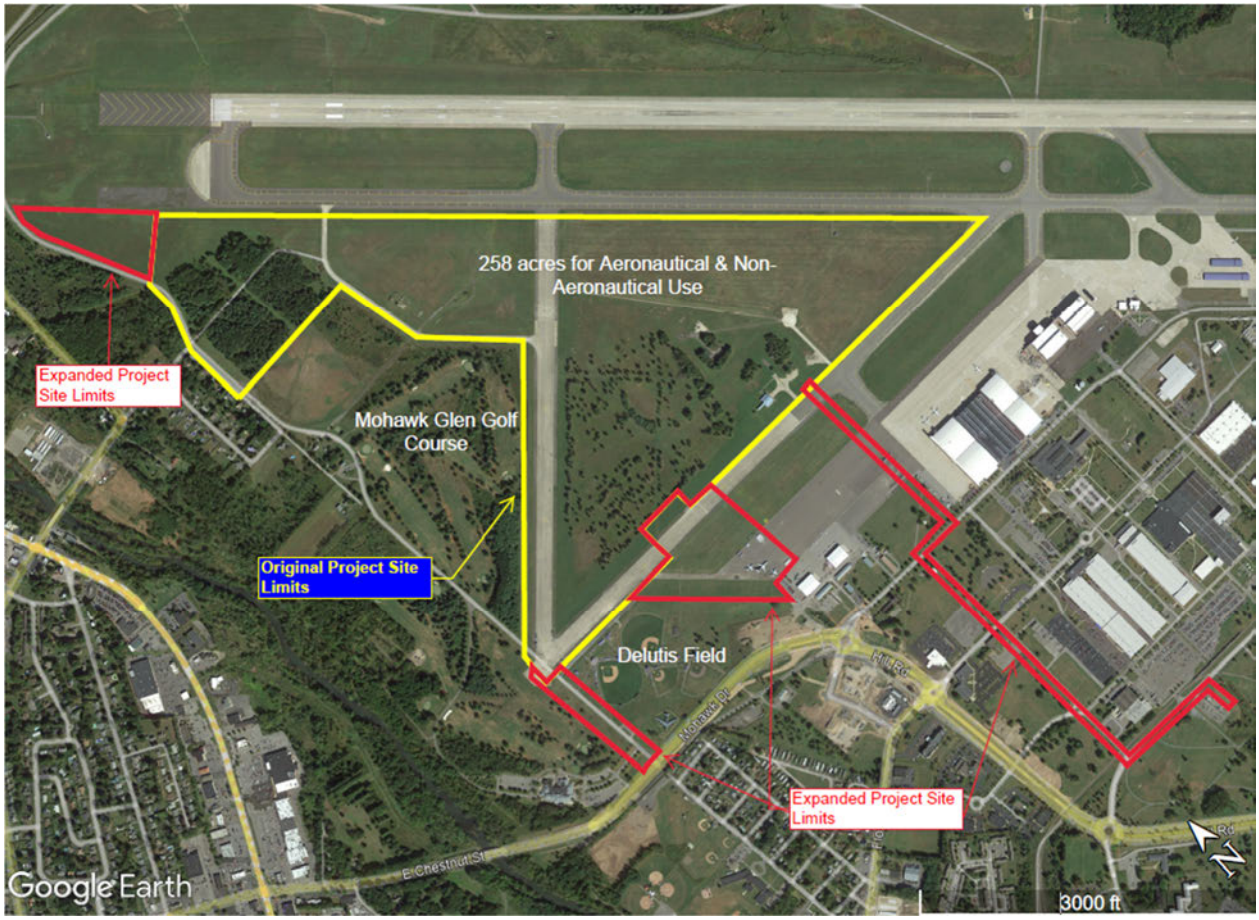
SHPO Site No.	Site Name
06541.000438	PCI Site #16
06541.000440 06541.000441	PCI Site #18 / PCI Site #19
06541.000445	PCI Site #24

Source: NYSHPO

August 2022

Discussions with the County indicated historical ground disturbance in the form of tree clearing/grubbing had taken place in the area of concern identified by NYSHPO. As a result, additional documentation was provided to NYSHPO to determine whether a Phase 3 archeological investigation would be required (**Appendix D**, pages D-257 to D-276). This information was provided in conjunction with the expanded Proposed Project limits (**Figure 4.10**).

Figure 4.10 - Expanded APE



Source: C&S Engineers, Inc.

A response from NYSHPO dated August 25, 2022, stated "we have reviewed the revised APE…First we have no additional archeological concerns based on the expansion of the APE and are not requesting that the newly expanded project site areas be surveyed…Second, we appreciate the additional information concerning the tree removal in the area that contains the sites where avoidance or Phase III investigations were requested... While aerial imagery can demonstrate that trees were removed, they cannot conclusively demonstrate the manor of their removal, or the degree of disturbance associated. Tree removal is quite common for areas under investigation and often does not constitute "significant" ground disturbance…Documentation of ground disturbance typically consists of soil bore logs, photos, or previous project plans. Given the possibility of ground disturbance from tree removal, OPRHP is prepared to endorse a more limited preliminary Phase III archaeological investigation of the three previously identified sites which should include relocating the sites and assessing their current integrity, in lieu of beginning with a full Phase III investigation as previously requested. That information can then be used to determine if the sites are still eligible and if a full Phase III investigation is warranted" (**Appendix D**, pages D-277 to D-278).

February – March 2023

As directed by NYS OPRHP, to further assess Sites #16, #18/19, and #24 for NYS and NRHP eligibility, a Phase II Archeological Site Evaluation (Phase II ASE) was completed by Hartgen in February 2023 (**Appendix H**, pages H-2 to H-69). Field work for the Phase II ASE included digging 12 trenches and conducting 23 shovel tests within the 6.52-acres APE (**Figure 4.11**). The Phase II ASE recommendations included "*Sites #16 and 18/19 are not National Register eligible and Site #24 remains a significant site and should be protected from ground-disturbing impacts. If it is to be impacted, a Phase III archeological data retrieval may be appropriate*" (**Appendix H**, page H-3).

Figure 4.11 - Phase II Archeological Site Evaluation APE



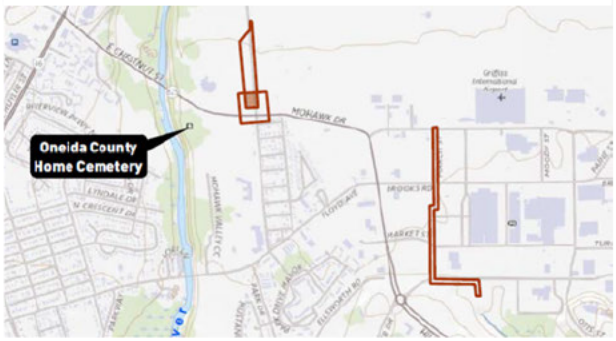
Source: Hartgen Archeological Associates, Inc. Phase II Archeological Site Evaluation (February 2023); C&S Engineers, Inc.

Correspondence received from NYSHPO concurred with the recommendations provided by Hartgen (letter dated March 23, 2023 in **Appendix D**, pages D-289 and D-290): "*NYSHPO concurs with the report recommendation that due to loss of site integrity sites 16A and 18/19 are no longer eligible for includes on the NRHP and that no additional archeological investigation is warranted….We further concur with the report recommendation that Site 24 retains its integrity and previously determine eligible status. Either avoidance or a Phase III mitigation is recommended. It is NYSHPO's opinion that the project will result in No Effect on historic properties, including archeological and/or historic resources, listed in or eligible for the NYS and NRHP with the stipulation that the avoidance plan submitted with the report is fully implemented…If plans for Site 24 change, our office will be consulted regarding the need for a Phase III mitigation of the site.*

March 2023

Based on monthly meetings held with various County, state, and local agencies (i.e., Airport, City of Rome, utility companies, NYSDOT, etc.) updates to the APE limits took place to incorporate modifications to proposed utility corridors and an area for a traffic roundabout (**Figure 4.12**).

Figure 4.12 - Phase IA APE Utility Corridors and Traffic Roundabout



Source: Hartgen Archeological Associates, Inc. Phase IA Literature Review and Archeological Sensitivity Assessment (March 2023)

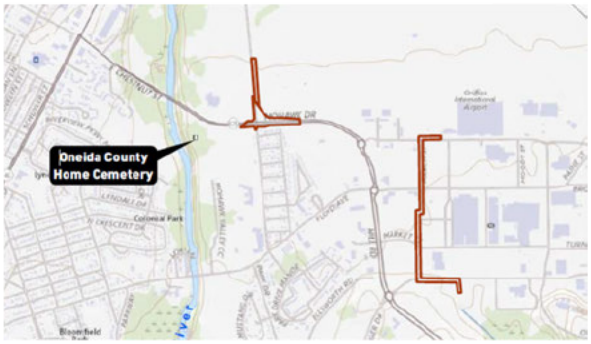
Due to numerous archeologically sensitive areas within and adjacent to the expanded APE limits, a Phase 1A Literature Review and Archeological Sensitivity Assessment (Phase 1A) was completed by Hartgen Archeological Associates Inc. (Hartgen) (**Appendix H**, pages H-71 to H-101). The additional APE limits are shown on **Figure 4.12** and incorporate the preliminary utility corridors and traffic roadway improvements (roundabout). The Phase IA investigation stated "*the archeological potential for most of the Project is low because of grading and other previous disturbances associated with the former Air Force Base. However, approximately 1,100 linear feet of the utility corridor on the west side of West Perimeter Road has a moderate archeological potential because it is near the Mohawk River and does not appear to have been graded for the nearby airstrip. Therefore, avoidance or archeological testing is recommended for the West Perimeter Road utility corridor*" (**Appendix H**, page H-72).

September – November 2023

Further refinements took place on the location of the utility corridors and traffic roundabout based on potential environmental impacts (i.e., reduce need for private property acquisition by shifting utility corridor to east side of Perimeter Road and shifting traffic roundabout further east onto County owned property).

A Phase 1A Literature Review and Archeological Sensitivity Assessment (Phase 1A*)* was completed by Hartgen Archeological Associates Inc. (Hartgen) in September 2023 (**Appendix H**, pages H-71 to H-101). The Phase 1A APE is shown on **Figure 4.13** which incorporates the final limits of off-site utility corridors and traffic roadway improvements (roundabout). The Phase IA investigation stated "*the archeological potential for most of the Project is low because of grading and other previous disturbances associated with the former Air Force Base. The B-52G bomber display Mohawk Valley does not meet the criteria for National Register listing, and its local commemorative function would be as potent if set up elsewhere in the former Griffiss Air Force base. As a practical consideration, however, any removal of the display to make room for the proposed West Perimeter Road / Mohawk Drive roundabout should also take into account the three or four smaller monuments adjacent to the bomber* (**Appendix H**, page H-104). The NYSOPRHP response letter dated November 17, 2023 (**Appendix D**, pages D-291 and D-292) stated "*we concur that the B-52G bomber …is not eligible for the national Register and its relocation would not impact historic resources…It remains NYSHPO's opinion that the project will result in No Effect on historic properties, included archeological and/or historic resources, listed in or eligible for the NYS and NRHP with the stipulation that the avoidance plan submitted with the report is fully implemented.* The location of the B-52G Bomber is shown on **Figure 4.14**.

Figure 4.13 - Phase IA APE Final Utility Corridor and Traffic Roundabout Limits

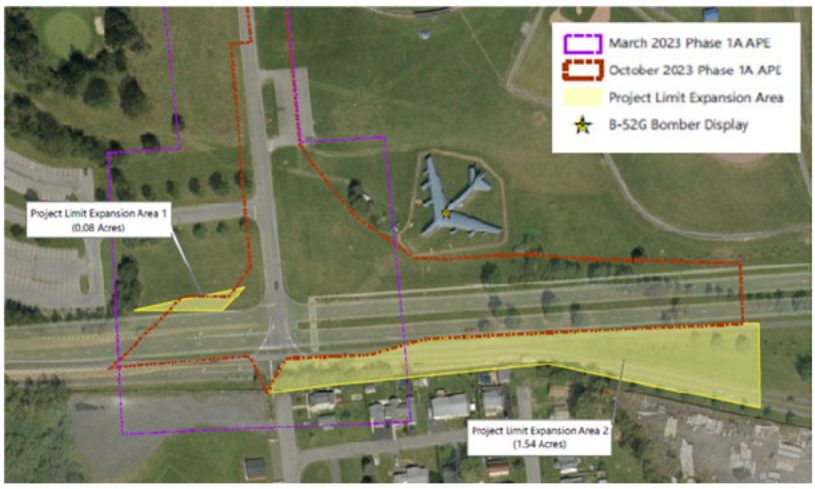


Source: Hartgen Archeological Associates, Inc. Phase IA Literature Review and Archeological Sensitivity Assessment (September 2023)

February 2024

Upon completion of the Noise Analysis for the Proposed Project, a noise barrier was recommended to minimize traffic noise (**Section 4.14** and **Appendix I**). This required an expansion of the Project area limits (**Figure 4.14**) and additional communication with the NYSHPO to determine if there was a potential for archeologically sensitive resources to be impacted. Additional project documentation was submitted to the NYSHPO in a letter dated February 12, 2024 (Appendix D, pages D-293 to D-298). The NYSHPO response letter dated February 14, 2024 (**Appendix D**, pages D-299 and D-300) stated "*it remains NYSHPO's opinion that the project will result in No Effect on historic properties, included*

Figure 4.14 - Expanded APE Limits for Noise Barrier



Source: C&S Engineers, Inc.

archeological and/or historic resources, listed in or eligible for the NYS and NRHP with the stipulation that the avoidance plan submitted with the report is fully implemented".

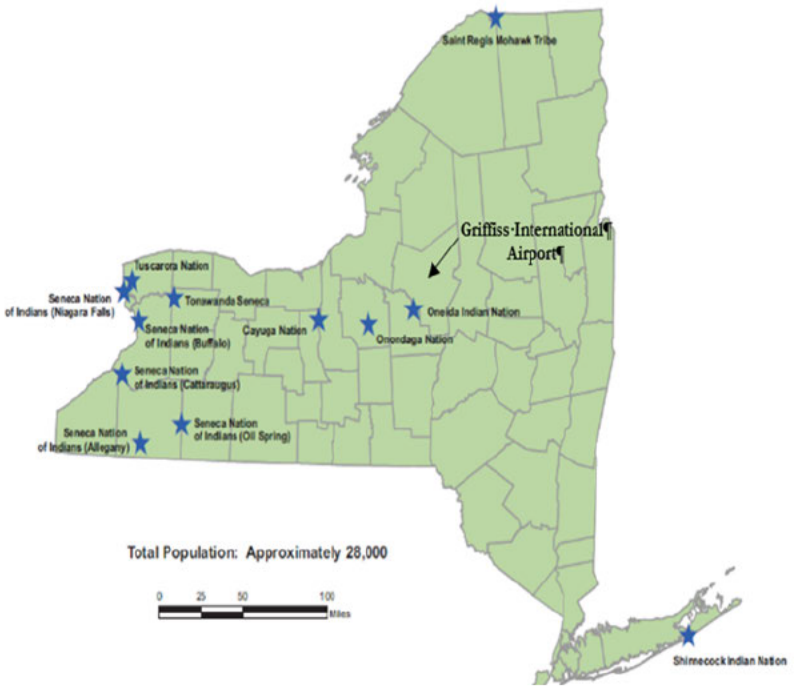
Historic Buildings and Sites

The National Park Service's *National Register of Historic Places (NRHP),*[30] was reviewed and no historic resources (districts, buildings, or landmarks) were identified on or in the immediate vicinity of the Project area. Correspondence with the NYSOPRHP dated July 15, 2021, August 25, 2023, March 23, 2023, November 17, 2023, and February 14, 2024 (**Appendix D**, pages D-255 and D-256, D-277 and D-278, D-289 and D-290, D-291 and D-292, and D-299 and D-300) indicated it is *NYSHPO's opinion that the project will result in No Effect on historic properties, including archeological and/or historic resources, listed in or eligible for the NYS and NRHP…*" therefore, there will be **no impacts**.

Tribal Resources

The USEPA Region 2 Tribal Program indicates that there are eight federally recognized tribes located at various locations throughout New York (**Figure 4.15**). The Oneida Indian Nation is headquartered in Verona, NY and owns tribal land in Verona, Oneida, and Canastota, NY. These lands are approximately 10 miles, 15 miles, and 20 miles southwest of the Project area respectively. There are no Oneida Indian Nation lands located within the Project area or its immediate vicinity. Additionally, the Federal & Indian Lands National Atlas of US indicates that there are no federally recognized tribal lands located within the vicinity of the Project area (**Figure 4.16**), therefore, there will be **no impacts**.

Figure 4.15 - Approximate Locations of Current Federally Recognized Indian Nation Lands in Region 2



Source: Indian Nation Lands in Region 2, Updated April 2015, accessed on 3/10/24 at Region 2 Indian Nations Program | US EPA

[30] National Park Service. *National Register of Historic Places Location Webmap*. Accessible at: https://public-nps.opendata.arcgis.com/datasets/nps-national-register-of-historic-places-locations (Accessed 12/9/22).

Figure 4.16 - Approximate Locations of Current Federally Recognized Indian Nation Lands in NYS

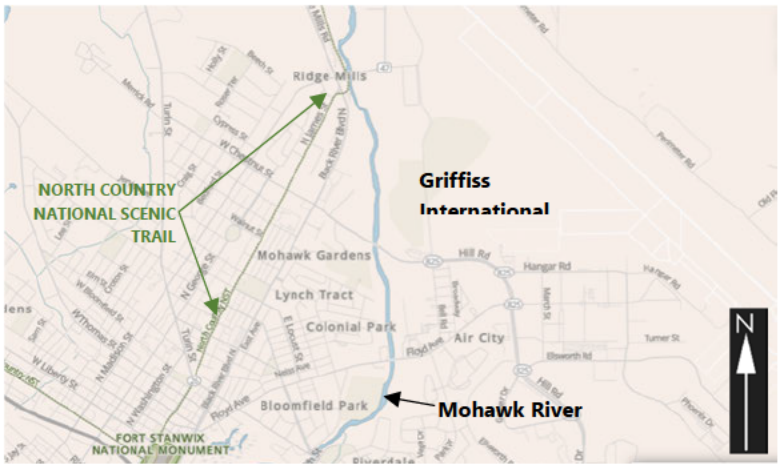


Source: Federal & Indian Lands National Atlas of US, accessed on 3/10/24 at 100854.pdf (usgs.gov)

National Historic Landmarks

The National Park Service (NPS) online database was reviewed for National Historic Landmarks (NHLs)[31] and National Scenic and National Historic Trail[32] located in Oneida County. A response was received from the NPS dated June 22, 2021, identified two NPS resources located near the Project area (Appendix D, page D-50). This includes the North Country National Scenic Trail and the Fort Stanwix National Monument, which are located 0.25 miles and 2 miles respectively from the Project area (**Figure 4.17**). The Project area is located east of the Mohawk River and the NPS resources are located west of the Mohawk River, therefore, there will be no impacts.

Figure 4.17 - NPS Resources Map



Source: National Park Service National Historic Landmarks and Scenic and Historic Trail

[31] NPS - National Register of Historic Places Locations | National Park Service (arcgis.com)
[32] National Scenic and National Historic Trail Webmap (arcgis.com)

Section 6(f) Properties

According to the LWCF (Land and Water Conservation Fund) database, there are no Section 6(f) properties located in the Project area or within its vicinity (**Figure 4.18**).[33] The nearest LWCF funded places are more than one mile away (Gryziec Field, Pinti Field, and Three Parks), therefore, there will be no impacts.

Figure 4.18 - LWCF Places



Source: LWCF Online Database

4.6.2 Environmental Consequences

No-Action Alternative

No development occurs with this alternative. Therefore, no impacts to historic, architectural, archeological, or cultural resources are expected.

Proposed Project

Impacts to PCI Site #24 are not expected since the Proposed Project has been modified to avoid development within this sensitive archaeological site (**Figure 4.1**).

4.6.3 Mitigation

A plan was prepared as part of the EA to avoid impacts to archeological resources. The plan is designed for the short and long-term protection of archeologically sensitive sites and includes the following:

- Site 24 will be marked on the site plan map as "Environmentally Sensitive, Do Not Impact."
- Site 24 will be marked with exclusionary fencing in the field by a NYSHPO approved archeologist prior to construction activities taking place in areas adjacent to the site.
- If for any reason Proposed Project recommendations were to change and ground disturbing activities were to take place within Site 24 and its associated buffer area, a Phase III Archeological Data Retrieval and Recovery Plan would be required and further coordination with the NYSHPO would need to take place.
- Proper soil erosion and sediment control plans will be utilized and maintained during construction activities.

4.6.4 Significance Threshold and Conclusions

The FAA has not established a significance threshold for historical, architectural, archeological, and cultural resources. However, the FAA does provide factors to consider when evaluating the context and intensity of potential impact an action would have on these resources. These factors include the determination for the action through the Section 106 process (no historic properties affected, no adverse effect, or adverse effect) and if the action involves more than a minimal use of a Section 4(f) resource.

[33] LWCF. Map of LWCF. Accessible at: https://lwcfcoalition.org/map (Accessed 9/15/23).

The Proposed Project will not impact historic resources (districts, buildings, or landmarks), federally recognized tribal lands, or national historic landmarks. With the implementation of mitigation measures so ground disturbing activities do not take place in archeologically sensitive areas, no impacts to archeological or cultural resources are expected.

Correspondence with the NYS OPRHP dated July 15, 2021, August 25, 2023, March 23, 2023, November 17, 2023, and February 14, 2024 (**Appendix D**, pages D-255 and D-256, D-277 and D-278, D-289 and D-290, D-291 and D-292, and D-299 and D-300) concur that no historic properties, including archaeological and/or historic resources, will be affected by the Proposed Project with the stipulation that the above mitigation measures are implemented.

4.7 New York State Department of Transportation Section 4(f) Resources

Section 4(f) of the United States Department of Transportation (USDOT) Act of 1966 requires the approval of the Secretary of Transportation for any project that uses publicly owned land such as a public park, recreation area, or wildlife refuge of national, state, or local significance or a historic site of national, state or local significance.

As per the 1050.1F Desk Reference, "A Section 4(f) use would occur if the proposed action or alternative(s) would involve an actual physical taking of Section 4(f) property through purchase of land or a permanent easement, physical occupation of a portion or all of the property, or alteration of structures or facilities on the property." "Use, within the meaning of Section 4(f), includes not only the physical taking of such property, but also "constructive use." The concept of constructive use is that a project that does not physically use land in a park, for example, may still, by means of noise, air pollution, water pollution, or other impacts, dissipate its aesthetic value, harm its wildlife, restrict its access, and take it in every practical sense. Constructive use occurs when the impacts of a project on a Section 4(f) property are so severe that the activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired." Prudent and feasible alternatives must first be considered before approving a use.

Section 6(f) applies to recreational properties that have been federally funded by the Land and Water Conservation Fund Act.

4.7.1 Affected Environment

The following online resources were reviewed to determine if any Section 4(f) resources are located within or adjacent to the Project area:

- City of Rome, NY parks map[34]
- City of Rome trailway systems maps[35],
- Google maps
- Griffiss Business and Technology Park in Rome, NY[36].
- NYS wildlife recreation map[37]
- NYS Parks, Recreation and Historic Preservation, Central Region [38]
- National Park Service[39]

[34] Parks Map - City of Rome (romenewyork.com)
[35] Trailway Systems - City of Rome (romenewyork.com)
[36] Sculpture Garden | Griffiss Business & Technology Park (griffissbusinesspark.com)
[37] Wildlife Recreation Map (ny.gov)
[38] Central Region (ny.gov)
[39] https://www.nps.gov/carto/app/#!/parks/state/ny

- National Register of Historic Places (NRHP)[40]

A map of potential Section 4(f) properties located within 1-mile of the Project area is shown on **Figure 4.19.** These properties are summarized in **Table 4.11** and include historic resources, parks, recreation areas, scenic trails, and cemeteries. Based on an evaluation of ownership (public or private), and whether the use was open to the public or private, a determination was made on properties considered to be Section 4(f) resources.

Table 4.11 Potential Section 4(f) Resources within 1-mile of the Project Area

Name	Property Type	Distance from Project Area (FT)	Section 4(f) Property
PCI Site #24	NRHP-eligible Archaeological Site	Within	Yes
Delutis Field	Private Recreational Use, publicly owned	Within	No[1]
Griffiss International Sculpture Garden Park	Public Park, publicly owned	Within	Yes
Mohawk Glen Golf Course	Public Recreation Area, privately owned	Adjacent	No
Rome Central School Recreational Fields	Public Recreational Area, publicly owned	132	Yes
Haselton Park	Public Park, publicly owned	1,545	Yes
North Country National Scenic Trail	NPS - Public Trail	1,881	Yes
St. Peters Cemetery	Public Cemetery, privately owned	2,874	No
Crescent Dr. Park	Public Park, publicly owned	3,100	Yes
Riverside Park	Public Park, publicly owned	3,214	Yes
St. John Baptists Cemetery	Public Cemetery, privately owned	3,409	No
Wright Settlement Cemetery	Listed on NRHP	4,349	Yes
Triangle Park	Public Park, publicly owned	4,941	Yes
Franklyn Field	Public Park, publicly owned	4,303	Yes
Holliss Hewitt/Lynwood Park	Public Park, publicly owned	4,564	Yes
Vogel Park	Public Park, publicly owned	5,145	Yes

Note 1: The Delutis Field is located on County-owned land and leased to a private organization (Rome Baseball Association (RBA)). The leased area is approximately 19.614 acres per the executed lease. Use of the area is on an "interim" basis with up to three terms of five years. The second amendment to the lease expires May 31, 2026 with up to one five-year term remaining. The RBA constructed four ball fields and associated facilities, is responsible for all maintenance and upkeep, and is allowed to use the area for sporting and recreational activities they may schedule during the term of the lease
Source: C&S Engineers, Inc.

[40] National Register of Historic Places (nps.gov)

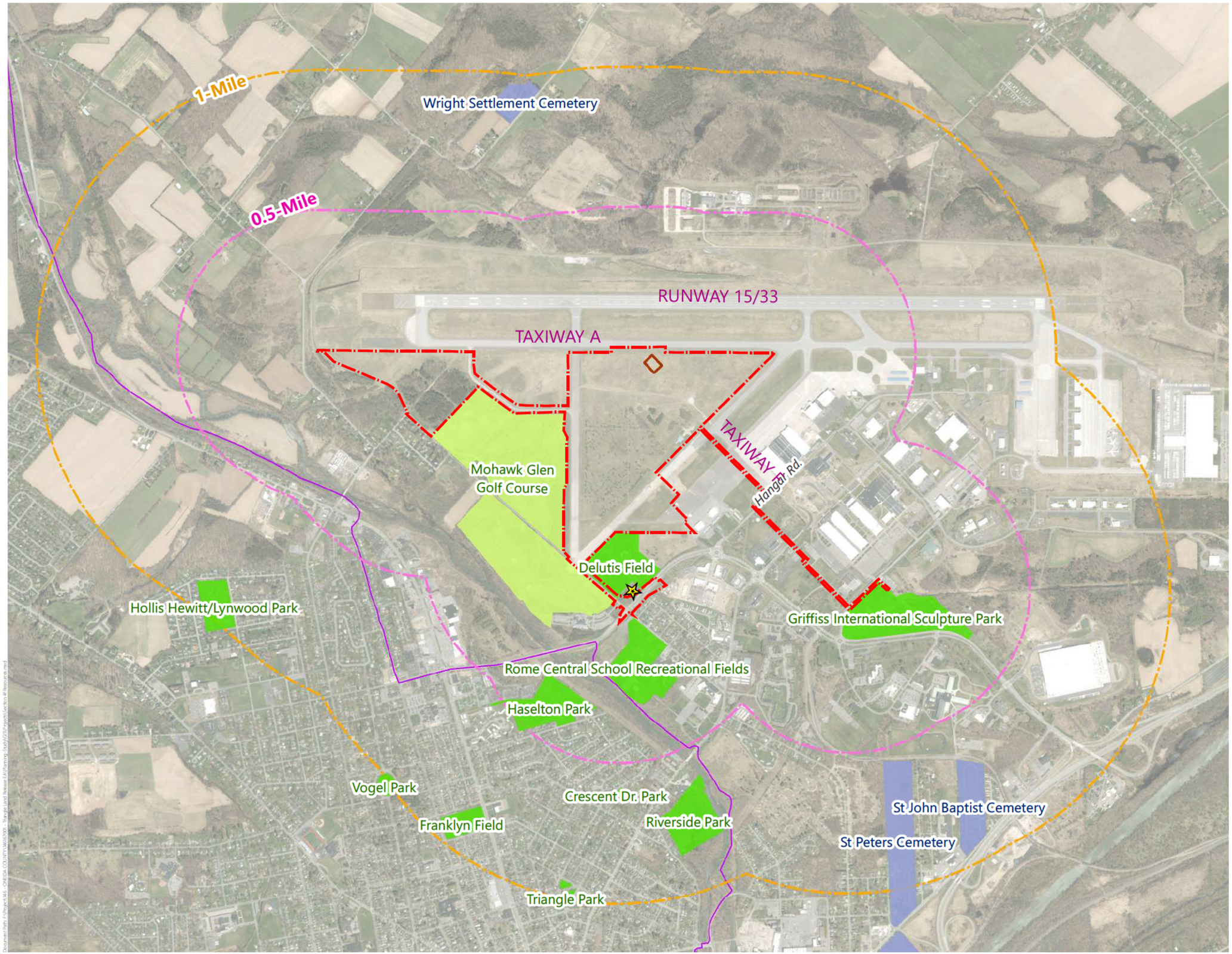


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Figure 4.19

Section 4(f) Resources

- B-52G Bomber Display
- Proposed Project Area/ Construction Limits
- Golf Course
- Cemetery
- Public Park & Recreation Area
- PCI Site #24
- North Country National Scenic Trail

N

0 1,000 2,000 4,000 Feet

1 in. = 1,700 ft.
When printed at 11 in. by 17 in.

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Sources: ESRI World Imagery; Created by C&S Engineers, Inc., 2024

Document Path: P:\Project\145 - ONEIDA COUNTY\165\005 - Triangle Land Release EA\Planning Study\GIS\Projects\Section 4f Resources.mxd

Of the sixteen properties evaluated in **Table 4.11**, twelve were determined to be Section 4(f) properties. Only two of the twelve Section 4(f) properties are located within the Project area (i.e., Griffiss International Sculpture Garden and PCI Site 24), and are discussed in further detail below.

Parks and Recreational Areas: The Griffiss International Sculpture Garden is a public park located within the Project area, that includes the following:

- A unique outdoor sculpture garden with 20 modern sculptures, the Vietnam Veterans Memorial, and a Pagoda Pavilion located on the grounds of the Griffiss Business and Technology Park (**Exhibit 4.3**).
- The scenic Nature Trail provides access to the sculptures, is paved, and approximately 2.1-miles long. The trail consists of an out-and-back loop (**Exhibit 4.4**).

The Bomber Disc Golf Course is an 18-hole public-use disc golf course intermingled within the amenities provided by the Griffiss International Sculpture Garden and Nature Trail (**Exhibit 4.5**).

Historic Sites: There are no National Register of Historic Places (NRHP) resources have been identified in the Project area or its vicinity, therefore, the would be no impact (**Section 4.6 – Historic, Architectural, Archaeological & Cultural Resources** for further details).

Archeological Resources: One archeological site eligible for the National Register of Historic Places was identified in the Project area (i.e., PCI Site #24). With the implementation of avoidance measures NYSHPO provided a **No Effect** determination (**Section 4.6 – Historic, Architectural, Archaeological & Cultural Resources** for further details).

Section 6(f) Properties: There are no Section 6(f) properties located in the Project area or within its vicinity, therefore, there would be **no impact** (**Section 4.6 – Historic, Architectural, Archaeological & Cultural Resources** for further details).

Wildlife and Waterfowl Refuges: Based on a review of the NYSDEC Recreation Lands there are no wildlife and waterfowl refuges in the vicinity of the Airport or Project area[41]. A review of the NYSDEC DECinfo Locator did not identify any NYS Wildlife Management Area (WMAs), state forest lands, and state forest preserves[42]. According to the USFWS, National Wildlife Refuge map there are no National Wildlife Refuges within or adjacent to the Project areas[43],therefore, **no impacts** to wildlife or waterfowl refuges are expected.

[41] NYSDEC Recreation Lands – Western Adirondacks/Upper Mohawk Valley/Eastern Lake Ontario – Region 6 – Oneida County Map. Accessible at: https://www.dec.ny.gov/outdoor/56243.html Accessed 9/15/23.
[42] DECinfo Locator (ny.gov)
[43] NWRS_National_Map (fws.gov)

Exhibit 4.3 – Griffiss International Sculpture Garden





Source: Griffiss Business and Technology Park. Griffiss Business and Technology Park. *Griffiss International Sculpture Garden*. Accessible at: https://www.griffissbusinesspark.com/sculpture-garden/ Accessed 1/31/2024.

Exhibit 4.4 – Natural Trail





Source: AllTrails - Griffiss Trail Loop. AllTrails. Accessible at: https://www.alltrails.com/trail/us/new-york/griffiss-trail-loop Accessed 1/31/2024.

Exhibit 4.5 – Bomber Disc Golf Course



Source: Griffiss Business and Technology Park. Bomber Disc Golf at Griffiss Park | Griffiss Business & Technology Park (griffissbusinesspark.com) Accessed 3/6/2024.

4.7.2 Environmental Consequences

No-Action Alternative

No development occurs with this alternative. Since existing site conditions do not change, no impacts to Section 4(f) resources are expected.

Proposed Project

The Proposed Project includes the construction of a utility corridor and acquisition of an easement on Section 4(f) property (Griffiss International Sculpture Park and Nature Trail). Specific impacts are summarized below and shown on **Figure 4.20.** Direct impacts include the following:

- Acquisition of a 1.3-acre utility corridor easement
- Construction of 1,175 linear feet of underground duct bank/utilities within 50-foot-wide corridor adjacent to Ellsworth Road (includes trenching, conduits, and backfilling/compaction, grading, and reseeding)
- Removal of approximately 1,175 linear feet of paved nature trail to install duct bank/utilities (0.22 acres)
- Removal of automobile parking area pavement to install duct bank/utilities (0.11 acres)

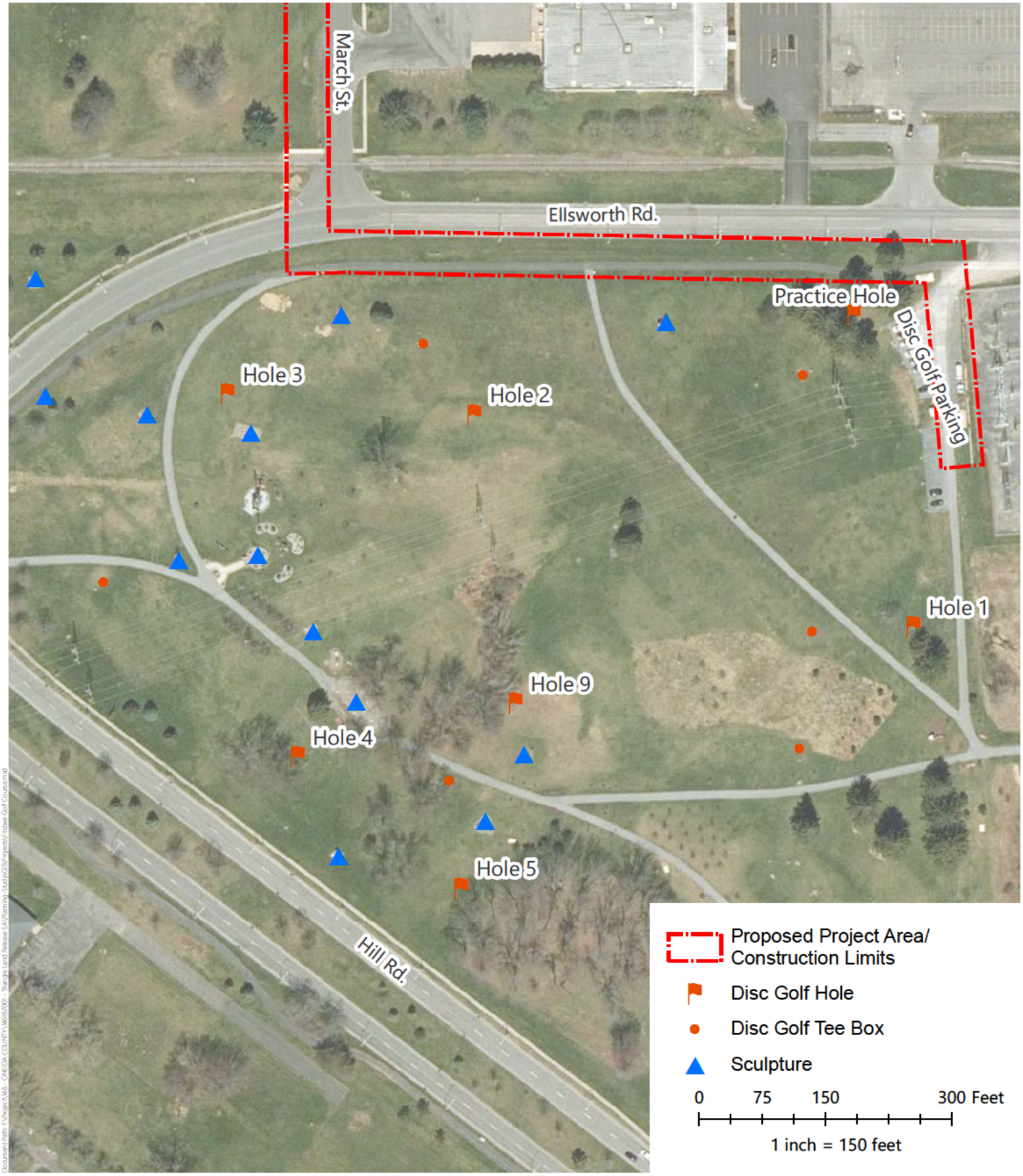
Indirect impacts will result from construction activities taking place (includes trenching, backfilling/compaction, grading, reseeding, and construction vehicle access). Impacts will be temporary, and areas will be restored to existing conditions upon completion of construction activities Temporary access to property within proposed construction limits will be required to conduct the following activities:

- Topographic survey
- Geotechnical investigation

4.7.3 Mitigation

Mitigation measures were developed in coordination with the agency having jurisdiction over the Griffiss International Sculpture Park and Nature Trail (**Appendix O**, page O-14). The following mitigation measures are recommended to minimize or avoid impacts related to Section 4(f) resources:

- Construction during off-season (i.e., winter months) to avoid interruption in use of Park, Nature Trail, and Bomber Disc Golf course.
- Maintain utility corridor as close to Ellsworth Road as possible (within the road right-of-way) to avoid/minimize impacts to the Nature Trail
- If impacts to Nature Trail take place, paved trail will be restored to existing conditions upon completion of construction activities.
- Replacement plantings at a 1:1 ratio for individual trees that may need to be removed during construction activities.
- Paved automobile parking lot will be restored to existing conditions upon completion of construction activities.



Sources: Sculptures and Disc Golf Features digitized by C&S Engineers, Inc., 2024. ESRI World Imagery Basemap. Created by C&S Engineers, Inc.

Figure 4.20| Bomber Disc Golf at Griffiss Park

EA for Land Release and Airport Business Park Development

4.7.4 Significance Threshold & Conclusion

As stated in Chapter 5 of the *Desk Reference*, a significant impact would occur when an action involves more than a minimal physical use of a Section 4(f) resource or constitutes a "constructive use" substantially impairing the Section 4(f) resource. A significant impact under NEPA would not occur if mitigation measures eliminate or reduce the effects of the use below the threshold of significance. If a project would physically use Section 4(f) property, the FAA is responsible for complying with Section 4(f) even if the impacts are less than significant for NEPA purposes.

"Use" in the context of Section 4(f) encompasses both physical use as well as constructive use. Physical use involves a physical taking of the Section 4(f) property. This could include purchase of land or a permanent easement, physical occupation, or alteration of structures or facilities on the property. "The concept of constructive use is that a project that does not physically use land in a park, for example, may still, by means of noise, air pollution, water pollution, or other impacts, dissipate its aesthetic value, harm its wildlife, restrict its access, and take it in every practical sense." Constructive use occurs when the impacts of a project on a Section 4(f) property are so severe that the activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired.

The FAA may make a *de minimis* impact determination with respect to a physical use of Section 4(f) property if, after taking into account any measures to minimize harm, the result is either:

- A determination that the Proposed Project would not adversely affect the activities, features, or attributes qualifying a park, recreation area, or wildlife or waterfowl refuge for protection under Section 4(f)
- A Section 106 finding of no adverse effect or no historic properties affected.
- Officials with jurisdiction must concur in writing that the Proposed Project will not adversely affect the activities, features, or attributes qualifying a park, recreation area, or wildlife or waterfowl refuge for protection under Section 4(f)

The FAA's NEPA document must include documentation sufficient to support the above results, including the measures to minimize harm that the FAA is relying on to make the *de minimis* impact determination.

With the implementation of the recommended measures to avoid and minimize harm to Section 4(f) resources, the Proposed Project will not adversely affect the activities, features, and attributes that qualify the Griffiss International Sculpture Park and archeologically sensitive site for protection under Section 4(f). As a result, the Federal Aviation Administration has determined that the Proposed Project will constitute a *de minimis* impact for each of the Section 4(f) resources as defined in 23 CFR §774.17(5) (**Appendix O**, pages O-30 to O-31).

Concurrence with the FAA *de minimis* finding has been received from the officials having jurisdiction over affected Section 4(f) resources (**Appendix O**, page O-32). Therefore, there will be no impact.

4.8 Farmlands

The Farmland Protection Policy Act (FPPA) of 1981 authorizes the U.S. Department of Agriculture (USDA) to develop criteria for identifying the effects of federal programs on the conversion of farmland to non-agricultural uses. The prime and unique farmland regulations require that the USDA determine whether land affected by any proposed action is prime and unique farmland. If the proposed action involves the acquisition of farmland that would be converted to non-agricultural use, it must be determined whether any of that land is protected by the FPPA.

The Natural Resource Conservation Service (NRCS), within the USDA have established guidelines under the FPPA for federal activities that involve directly undertaking, financing, or approving a project that would impact farmland soils. The guidelines recognize that the quality of farmland varies based on soil conditions,

and places higher value on soils with high productivity potential. To preserve these highly productive soils, the NRCS classifies soil types as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. The NRCS requires that soils in these categories be given proper consideration before they are converted to non- farming uses by federal programs. The NRCS policy and procedures on prime and unique farmland are published in the Federal Register (Volume 43, No. 21, January 31, 1978).

4.8.1 Affected Environment

Farmland: According to the Web Soil Survey from the NRCS (**Figure 4.21**), soil types identified as farmland of statewide importance and prime farmland are located within the Project area.

Agricultural Districts: Based on review agricultural district mapping for Oneida County, no agricultural districts are present within the Project area (**Figure 4.22**).

A response letter from the NYS Agriculture and Markets dated June 14, 2021, stated "*based upon the information provided, it appears that the affected land is not located within a county adopted, State certified, agricultural district*" (**Appendix D**, pages D-40 to D-41).

4.8.2 Environmental Consequences

No Action Alternative

No development takes place with this alternative. Therefore, no impacts to farmlands are expected.

Proposed Project

Although the Project area does contain prime farmland soils and soils of statewide importance, there is no active farming taking place within the Project area. Given that the Project area is not located within an Agricultural District, and that the Proposed Project would not involve the conversion of FPPA farmland to non-agricultural uses, there will be **no impact.**

4.8.3 Mitigation

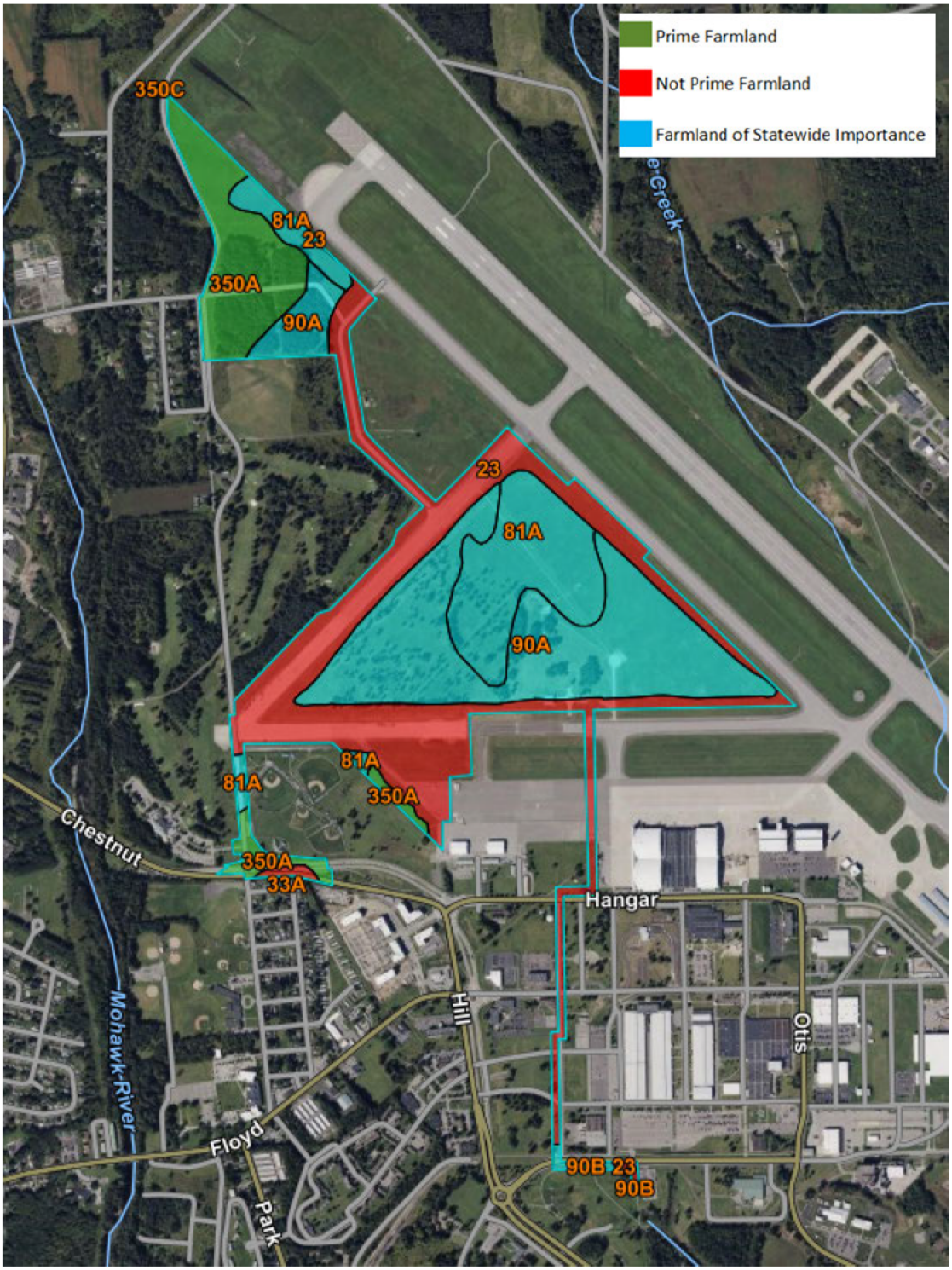
No farmland areas protected under the FPPA are located within the Project area. Therefore, no mitigation is required.

4.8.4 Significance Threshold and Conclusions

FAA Order 1050.1F, Exhibit 4-1 provides the FAA's significance threshold for farmlands. If an action has the potential to convert important farmlands to non-agricultural uses, the action would have an impact on farmlands. If the site receives a score of less than 160 points, the potential impacts are not considered to be significant and further evaluation is not required. If the site receives a total score of more than 160 points, it would be given increasingly higher levels of consideration for protection. If the site receives a score of more than 200 points, it is considered to have a significant impact on farmlands.

The soils within the Project area are not used for agricultural purposes. The Proposed Project would not involve the conversion of FPPA farmland to non-agricultural uses, and would not include any development activities, new impervious surfaces, or acquisition of land within a county adopted, state certified, Agricultural Districts, therefore, there will be no impact.

Figure 4.21 - Prime Farmland and Farmland of Statewide Importance



Source: USDA, Web Soil Survey

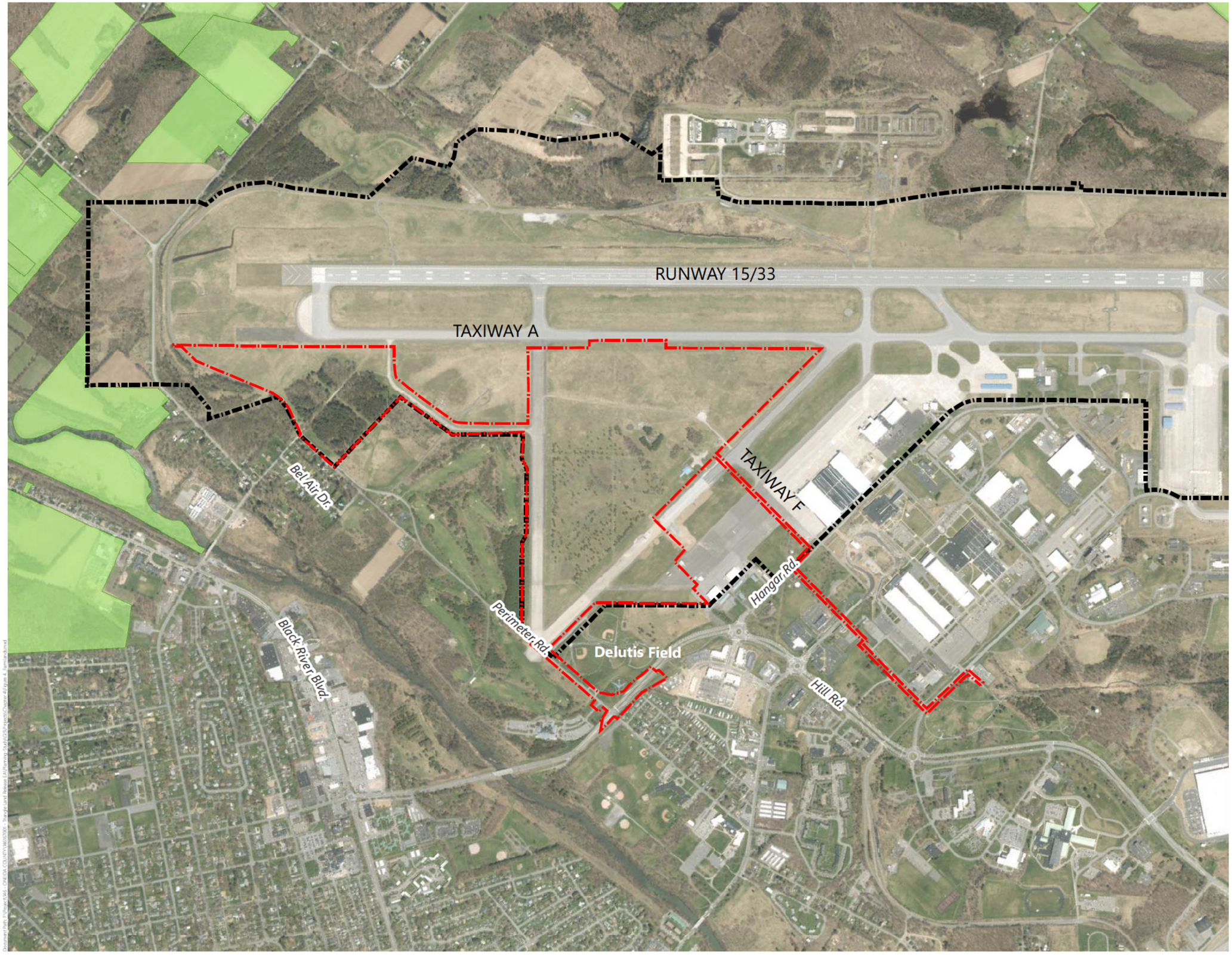


Figure 4.22

Agricultural Districts

- Proposed Project Area/ Construction Limits
- Airport Property
- Agricultural Districts

N

0 700 1,400 2,800 Feet

1 in. = 1,200 ft.
When printed at 11 in. by 17 in.

EA for Land Release and Airport Business Park Development

Sources: Aerial from ESRI; Parcels from Oneida County;
Tax records from City of Rome, Online Property Information.
Available at: http://imo.romenewyork.com/search.aspx (Accessed 11/3/22),
NYS Dept. of Agriculture & Markets, Oneida County, Agricultural District Maps 2013
Created by C&S Engineers, Inc., 2024

4.9 Hazardous Materials, Solid Waste and Pollution Prevention

As noted in FAA Order 1050.1F, hazardous materials, solid waste, and pollution prevention as an impact category requires evaluation of waste streams generated by a project, and the impacts on waste handling and disposal facilities that would likely receive the wastes; potential hazardous materials that could be used during construction and operation of a project, and applicable pollution prevention procedures; potential to encounter existing hazardous materials at contaminated sites during construction, operation or decommissioning of a project; and the potential to interfere with any ongoing remediation of existing contaminated sites within or in the immediate vicinity of the Project area.

4.9.1 Affected Environment

Superfund National Priorities List

The Airport site (which includes the Project area) was formerly part of the Griffiss Air Force Base, a 3,550-acre base that was the site of various Air Force operations from 1943 until its deactivation in September 1995. During its 50 years of operation, hazardous wastes were generated from various activities including: aircraft operation; testing and maintenance; firefighting exercises; discharge of munitions; landfill operations; and research and development activities. Over the years, these wastes were disposed of in landfills and dry wells located across the base. According to the USEPA Superfund Program website,[44] the USEPA added Griffiss Air Force Base (a portion of which is currently Griffiss International Airport) to the Superfund National Priorities List (NPL) on November 1, 1984, because hazardous chemicals were found in the soil and groundwater. Groundwater beneath portions of the base was found to be contaminated with volatile organic compounds (VOCs), which are potentially harmful substances that easily evaporate in the air. Soils were contaminated with heavy metals and polychlorinated biphenyls (PCBs). PCBs and semi-volatile organic compounds were also found in two nearby bodies of water, Three Mile Creek, and Six Mile Creek. Between 1985 and 1989, underground storage tanks (USTs) and associated soil contamination were removed from the site. The Air Force provided bottled water for residents affected by contaminated well water and provided the community with funds to connect to the municipal water supply. These connections were made by late 1991. In 1997, the Airport performed several removals of soil contaminated with PCBs and petroleum, several drywells, and sumps, and one small landfill used to house low level radioactive tubes. The remaining landfills were capped.

According to the USEPA Superfund website, the site is listed as "*under control*" for human exposure status and for contaminated groundwater control status, and all known potential risks to public health and the environment have been addressed and are currently under control. Risk from exposure to contamination remaining at the former Griffiss AFB is very limited according to the listing. Groundwater at the former base is not used as a drinking water supply and access to sites at the base where cleanup has not yet been fully completed is restricted via fencing, signage, and gates. All other areas of known remaining contamination have been addressed via land use controls / institutional controls (LUC / ICs) contained in Records of Decision (RODs), and various property transfer documents, including property deeds. Restrictions on land use, such as restriction to non-residential uses, and restrictions that address soil vapor intrusion (SVI), have also been incorporated into the applicable RODs and property deeds. All areas of known groundwater contamination undergo periodic sampling and monitoring, and extraction of groundwater at these areas by current landowners is prohibited by LUC / ICs in applicable deeds. Additional cleanups are currently underway at the former base to allow for the removal of some or all of the restrictions at a number of sites.

[44] https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0202438

As previously noted, the entire former air force base was placed on the NPL in 1987. Since then, approximately 2,900 acres were delisted, and 650 acres remain on the NPL.[45] The remaining sites are undergoing various stages of remediation and monitoring that include the following:

- Land-Use Control / Institutional Control (LUC / IC)
- Long-Term Monitoring (LTM) Sites
- Ongoing Remedial Action Sites
- Sites with RODs signed since the last 5-Year Review
- Sites with RODs pending or planned.

Installation Restoration Program (IRP) / Land Use Restrictions

As part of the former Griffiss Air Force Base, the Airport site is part of the Installation Restoration Program (IRP), which is "a comprehensive program designed to address contamination from past activities and restore former Air Force lands to useable conditions".[46] The purpose of the program is to "identify, investigate and clean up hazardous substances, pollutants and contaminants that pose environmental health and safety risks at active military installations and formerly used defense sites (FUDS)". The IRP response actions are conducted in accordance with the provisions of CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan. In 1990, an Interagency Agreement among the EPA Region 2, NYSDEC, NYSDOH, and the Air Force was signed to remediate the site. The EPA, NYSDEC, and NYSDOH have provided oversight of Air Force environmental activities at the former base for over 30 years, including reuse activities conducted by subsequent property owners. As part of the program, the following land restrictions were placed on the sites to prevent the public from encountering the contaminants:

- Development and use of the property is restricted to industrial, commercial, and non-residential land uses.
- Soil / groundwater intrusive work, groundwater consumption, and groundwater well installation are prohibited without prior approval from the New York State Department of Health (NYSDOH).

Perfluorinated Compounds (PFCs)

Airport Site History

The former Fire Protection Training Area (FPTA, aka FT-030P) is located adjacent to the Project area and was used to simulate aircraft fuel fires from the 1960s to base closure in 1995. Fire training activities occurred approximately three times a year between 1970 and 1995. During this time, aqueous film-forming foam (AFFF) was used in undocumented quantities. Petroleum fires were set for burning and extinguishing practice approximately three times a year. JP-4 fuel and waste JP-4 were the most common fuels used in the fire training exercises. FPTA activities originally occurred on bare soil at this site. In 1985, contaminated soil was removed, and a new FPTA was constructed at the same location. Contaminated soil was defined as soil with oil and grease contamination greater than 10 parts per million (ppm). Approximately 500 cubic yards of soil were removed during the remediation action. A 1985 letter from the Installation Environmental Coordinator to the Oneida County Department of Public Works requested that soil be used as daily cover at the Oneida County Ash Disposal Landfill. No confirmation regarding the acceptance of this request has been located. The reconstructed FPTA consisted of a clay-lined concrete basin that was approximately 100 feet in diameter and contained a mock aircraft in its center. A JP-4 underground storage tank (UST) was located northeast of the concrete basin. The UST supplied the fuel through an underground pipeline to ignite fires. An oil/water (O/WS) separator system was used to collect the waste liquids generated during fire training; however, the system capacity was reportedly insufficient to handle the volume of waste liquids generated during the training exercises and frequently overflowed. In 1993, the original 4,000-gallon O/WS and two USTs were replaced by a 10,000-gallon O/WS. The new O/WS

[45] GRIFFISS AIR FORCE BASE (11 AREAS) | Superfund Site Profile | Superfund Site Information | US EPA
[46] Installation Restoration Program (IRP) (army.mil)

transferred aqueous waste to a sanitary lift station and petroleum waste to the remaining UST until 1996, when the UST was replaced with an aboveground storage tank (AST). The concrete basin, covering gravel, and surrounding asphalt were removed in 1998, with the O/WS, AST, and remediation of superficial contaminated soils occurred in 1999. Soils from the excavation activities were land farmed on Apron 1 along with other contaminated soil from the installation. The excavation areas were backfilled with treated soil from Apron 1 (although not specifically the FTA-related soil). None of these previous remedial assessment, investigation, or remedial efforts addressed PFCs.

Since 2014 the Air Force has been evaluating the presence of Per- and polyfluoroalkyl substances (PFAS) at the former Griffiss Air Force Based. In November 2014, a site investigation was conducted by Amec Foster Wheeler to evaluate the presence of PFAS in soil, groundwater, surface water, and sediment at and adjacent to the FPTA (FT030) with a number of samplings taking place on the site (**Figure 4.22A**). The site investigation findings are summarized in the *Final Site Investigation Report, Former Fire Training Areas FT030, Griffiss Air Force Base* and include the following:

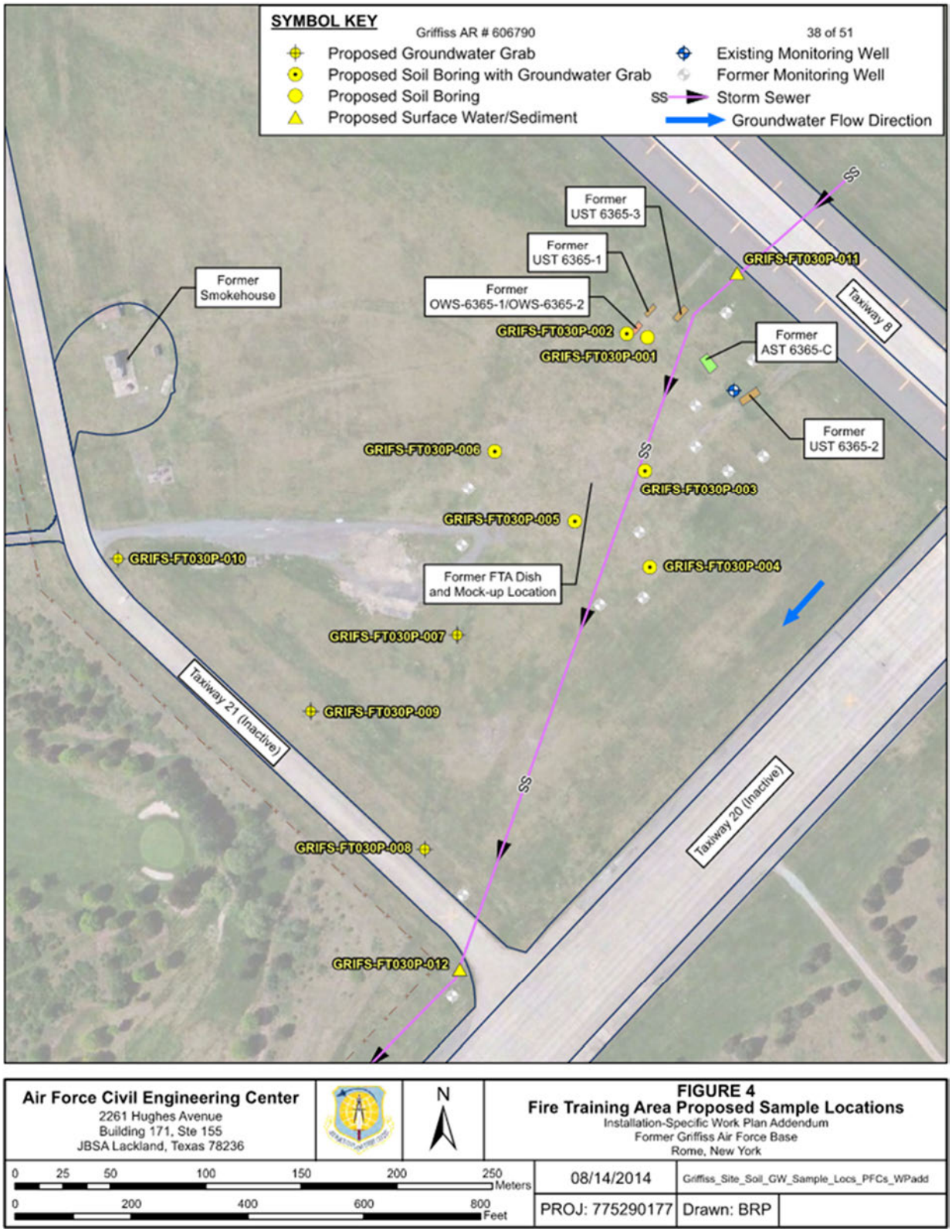
- **Soil samples**: Perfluorooctanesulfonic Acid (PFOS) was detected in all six borings sampled (FT030-001, FT030-002, FT030-003, FT030-004, FT030-005, FT030-006). Perfluorooctanoic Acid (PFOA) was detected in one boring (FT030-005). PFBS was not detected in any of the soil boring samples.
- **Groundwater samples**: PFOS, PFOA, and PFBS were detected in groundwater. PFOS and PFOS + PFOA were detected in all nine wells except FT030-007. PFBS was detected in six of nine wells.
- **Surface Water and Stormwater samples**: Only PFOS was detected in one (FT030-012) of two locations sampled (FT030-011, FT030-012).

In 2015 a Preliminary Assessment (PA) of the former Air Force Base was prepared by Amec Foster Wheeler. The PA provided findings from research conducted to determine whether and where AFFF, containing PFOS, PFOA or PFBS, was stored, handled, used or released at the former Air Force Base. Based on the research conducted during the PA, 17 potential AFFF areas were identified that potentially required further action. Additional areas were added based on discussions with the Air Force bringing the final total to 19 potential AFFF areas requiring further investigation (Area 17 and 18 were combined into one site). Area 20 (Fire Training Area 0 FT030) was one of the additional areas added to assess the migration of PFOS, PFOA or PFBS in groundwater toward the Mohawk River (**Figure 4.22B**). Based on the PA all 19 areas required further investigation.

In 2016 site investigation (SI) activities were conducted between October 24, 2016, and December 7, 2016. The SI included 10 AFFF Areas identified for inspection during the 2015 PA (Amec Foster Wheeler, 2015) and further refined the Final Installation Work Plan (ISWP) (Amec Foster Wheeler, 2016). Media sampled during this 2016-2017 SI included soil, groundwater, surface water, stormwater, sediment and UST contents. Data presented in this Site Inspection Report (SIR) were collected and evaluated in accordance with the Quality Program Plan (QPP). (Amec Foster Wheeler, 2016a). AFFF Area 20: FTA (FT030) sampling locations are shown on **Figure 4.22C.** Findings included the following:

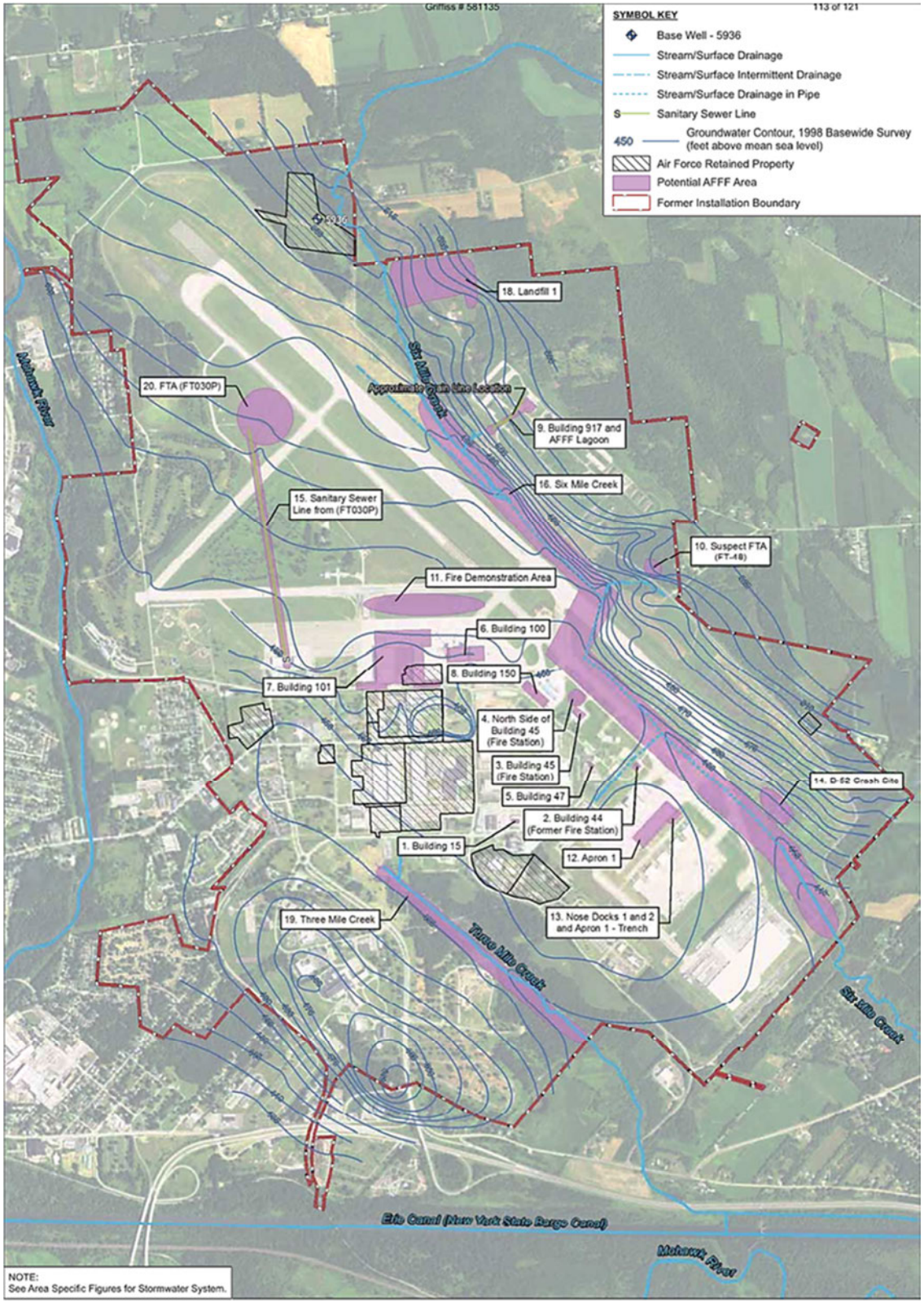
- **Sediment samples**: PFOS was detected below the Air Force calculated screening levels at the stormwater outfall (SW/SD20002) and at the Mohawk River downgradient (SW/SD20003) of the stormwater outfall. PFOA and PFBS were not detected.
- **Surface Water and Stormwater samples**: PFOS, POFA, and PFOA + PFOS were detected in stormwater at the storm drain and stormwater outfall (SW/SD20001, SW/SD20002). PFBS was not detected. PFOS, POFA, and PFBS were not detected in surface water samples collected from the Mohawk River.

Figure 4.22A – Fire Protection Training Area (FPTA) PFAS Sampling Locations



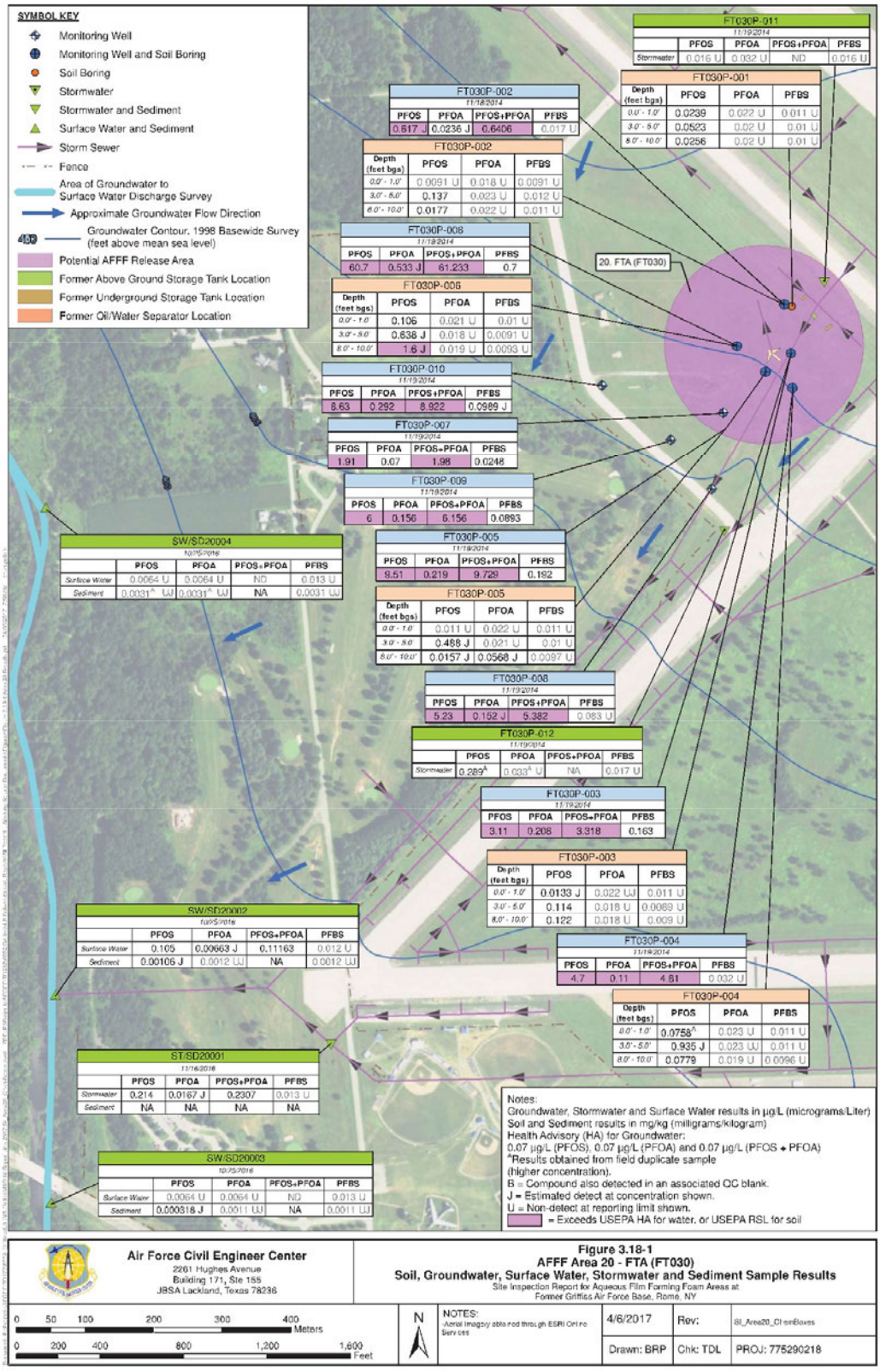
Source: Air Force Engineer Center, Site Inspection Report for AFFF Areas at Former Griffiss Air Force Base, Rome, NY 6/6/2017

Figure 4.22B – Base Wide Potential AFFF Release Areas



Source: Air Force Engineer Center, Site Inspection Report for AFFF Areas at Former Griffiss Air Force Base, Rome, NY 6/6/2017

Figure 4.22C – Analytical Results of FPTA PFAS Testing



Source: Air Force Engineer Center, Site Inspection Report for AFFF Areas at Former Griffiss Air Force Base, Rome, NY 6/6/2017

In November 2018 a Final Site Inspection Report (SIR) for Aqueous Film Forming Foam (AFFF) Areas, Former Griffiss AFB was prepared based on findings presented in the *Final Perfluorinated Compounds (PFCs) Preliminary Assessment. Former Griffiss Air Force Base, Rome, New York* (Amec Foster Wheeler, 2015). This work was performed in accordance with the Final General Quality Program Plan (QPP) (Amec Foster Wheeler, 2016a), and the Final Installation Specific Work Plan (ISWP) (Amec Foster Wheeler, 2016). Objectives for the SI included the following:

- Determine if PFOS, PFOA, or PFBS are present in groundwater, soil, surface water, sediment or storm water.
- Determine if PFOS, PFOA or PFBS are present in liquid contained in waste AFFF underground storage tanks (USTs).
- Determine if concentrations of PFOS, PFOA, or sum of both (PFOS+PFOA) in groundwater exceed the U.S. Environmental Protection Agency (USEPA) Health Advisory (HA) of 0.07 µg/L.
- Determine if concentrations of PFBS in groundwater exceed the USEPA Regional Screening Level (RSL) Tap Water (400 µg/L), and if concentrations in soil exceed the RSL of 1,300 mg/kg.
- Determine if concentrations of PFOS or PFOA in soil or sediment exceed Air Force (AF) calculated screening level of 1.260 mg/kg.
- Identify potential human health pathways and receptors and if necessary, mitigate impacts to drinking water greater than the HA that are attributable to the AF.

As there are no regulatory criteria for PFOS, PFOA and PFBS in surface water, results were evaluated based on presence or absence and not compared to a specific project screening level. Surface water body usage was evaluated to determine drinking water sources. Analytical results related to AFFF Area 20 – Fire Training Area (FT030) are shown on **Figure 4.22C** and include the following:

2014

- **Soil samples**: PFOS was detected below the AF calculated screening level for five of the six borings sampled (FT030-001, FT030-002, FT030-003, FT030-004, FT030-005) and above the AF calculated screening level for one boring sampled (FT030-006). PFOA was detected in one boring (FT030-006). PFBS was not detected.
- **Groundwater samples**: PFOS and PFOS + PFOA were detected above the HA in all nine wells. PFOA was detected below the HA in two wells (FT030-002, FT030-007) and above the HA in seven wells (FT030-003, FT030-004, FT030-005, FT030-006, FT030-008, FT030-009, FT030-010). PFBS was not detected for three wells (FT030-002, FT030-004, FT030-008) and was detected below the RSA Tap Water for detected in six wells (FT030-003, FT030-005, FT030-006, FT030-007, FT030-009, FT030-010).
- **Surface Water and Stormwater samples**: Only PFOS was detected in one (FT030-012) of two locations sampled (FT030-011, FT030-012).

2016

- **Sediment samples**: PFOS was detected below the AF calculated screening levels at stormwater outfall (SW/SD20002) and at the Mohawk River downgradient (SW/SD20003) of the stormwater outfall. PFOA and PFBS were not detected.
- **Surface Water and Stormwater samples**: PFOS, POFA, and PFOA + PFOS were detected in stormwater at the storm drain and stormwater outfall (SW/SD20001, SW/SD20002). PFBS was not detected. PFOS, POFA, and PFBS were not detected in surface water samples collected from the Mohawk River (SW/SD20003, SWSD20004).

The USAF is currently performing a base wide evaluation to identify potential non-AFFF sources of PFAS that may have been used at the base. It is also USEPAs position that a base-wide Remedial Investigation (RI) to assess PFAS contamination is required, and that the scoping will include the USAF, NYSDEC, and USEPA. The timing is not known.

Agency Oversight

USEPA Region 2, NYSDEC, and NYSDOH have provided oversight of USAF environmental activities at Griffiss AFB for several decades. This includes coordination and approval of work plans and reports, community participation, reuse activities conducted by subsequent property owners, under CERCLA, the USAF IRP and the Federal Facilities Agreement (FFA) between affected parties, and were directly involved in the PFC investigations discussed above.

Federal and State Regulatory Setting

In April 2024, the PFAS National Primary Drinking Water Regulation (NPDWR) was enacted. The EPA established legally enforceable levels for six PFAS know to occur individually and/or as mixtures in drinking water. EPA will regulate five PFAS individually: PFOA, PFOS, Perfluorohexanesulfonic acid (PFHxS), Perfluorononanoic acid (PFNA), and Hexafluoropropylene oxide dimer acid (HFPO-DA); and four PFAS mixtures: PFHxS, PFNA, HFPO-DA, and PFBS. Public water systems will have three years to complete the initial monitoring requirements (2027). They must inform the public of the level of PFAS measured in their drinking water and they must implement solutions to reduce PFAS in their drinking water to levels below the standards within five years (2029).

Also in April 2024, the EPA finalized a rule to designate two PFCs (PFOA, PFOS) as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Any entity that releases a pound or more of PFOA or PFOS, or their salts or structural isomers, in any 24-hour period must report those releases consistent with CERCLA Section 103 and Emergency Planning and Community Right-To-Know Act (EPCRA) Section 304 and their implementing regulations. CERCLA is designed to ensure those responsible for contamination pay to clean it up. EPA will focus its enforcement efforts on holding responsible those who significantly contribute to the release of PFAS into the environment.

Applicable NYSDEC guidance for PFCs (PFAS) is contained in the Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Under NYSDEC's Part 375 Remedial program, dated April 2023. NYSDEC's Division of Environmental Remediation (DER) performs or oversees sampling of environmental media and subsequent analysis of PFAS as part of remedial programs implemented to ensure consistency in sampling, analysis, reporting, and assessment of PFAS. NYSDEC adopted ambient water quality guidance values for PFOA and PFOS. The groundwater samples are compared to the human health criteria f of 6.7 ppt for PFOA and 2.7 ppt for PFOS. The guidance values for soil for protection of groundwater is 0.8 ppb for PFOA and 1.0 ppb for PFOS.

Project Area Environmental Site Assessments

Since the former Griffiss Air Force Base (which includes the Airport) is on the NPL and is part of the IRP, Phase I Environmental Site Assessments (Phase I ESAs), and a Phase II ESA were prepared to determine the potential to encounter hazardous materials within the Project area.

The Project area changed several times based on agency coordination, potential environmental impacts, results of specialized studies (preliminary design), and the addition/refinement of project elements (utility

corridors, traffic roundabout, and noise barrier). This required the preparation of several ESAs and additional documentation. These efforts have been summarized below.

October 2022: Phase I ESA for 285-acre Project area (**Appendix G**, pages G-2 to G-101). On site observations took place on June 10, 2021, and August 15, 2022.

January 2023: A Phase II ESA was conducted in an area where five underground storage tanks (USTs) were previously located in and around Building 222 (former Building 5771) (**Appendix G**, pages G-103 to G-238). Investigation of the site was conducted from September 19-21, 2022, and included the following:

- Twenty-nine soil borings
- Installation of six temporary groundwater monitoring wells
- Sixteen soil samples and groundwater samples were analyzed for a combination of NYSDEC Part 375 VOCs, Part 375 SVOCs, and PCBs. Testing did not include analysis of PFCs.

Based on the September 2022 investigation, no contaminant concentrations exceeded a NYSDEC Part 375 Unrestricted-Use soil cleanup objective (SCO). Although there were low-level detections of several semivolatile organic compounds (SVOCs) in each groundwater monitoring well, none of these SVOCs are present at a concentration of more than 1 ppb.

The Phase II ESA noted "*if site development requires excavation in the areas of the former USTs adjacent to Building 222 (former Building 5771), special measures may be needed…since previous reports indicated that contaminated soil may remain under Building 222. The building also has a floor drain system and trenches associated with jet powered aircraft exhaust. It is expected that fuel or petroleum contaminated materials are present in these structures*" (**Appendix** G, page G-117).

March 2024: Phase I ESA for 4-acre traffic roundabout area (**Appendix G**, pages G-240 to G-383). On-site observations took place on July 26, 2023.

March 2024: Memo for noise barrier documenting Phase 1 ESAs prepared for traffic roundabout included this area in the ERIS documentation within a one-mile radius (**Appendix G**, page G-384)

Based on information obtained from the Phase I and Phase II ESAs, the potential areas of concern with respect to the Proposed Project are summarized in **Table 4.12** and are shown on **Figure 4.23.**

Table 4.12 - Potential Areas of Concern

Name	Site Information	Within Project Area	Further (Phase II) Investigation Required
Building 222 & Nearby Building Pads for Former Buildings 5773 and 5774	The current Building 222 (formerly Building 5771 Hush House) and former nearby buildings and pads (i.e., Buildings 5773 and 5774) on the southern portion of the Project area were generally associated with jet engine testing. Above ground storage tanks (ASTs), underground storage tanks (USTs), and underground oil water separators were associated with these buildings, with spills identified during their closure. The spills have been closed by NYSDEC, although reports indicated that residual petroleum contamination may be present along the northern side of Building 222. Multiple totes, drums, and pails of AFFF, Type IV deicing liquid, oils, and painting materials were physically observed in and around the Building 222 at the time of the Phase I ESA site reconnaissance. Stained concrete flooring is also present. Except for a steel drum on the north exterior, the containers were in good condition. The steel drum was bulged, and a petroleum odor was noted. A groundwater monitoring well was noted along the east side of former Building 5773. It is likely associated with the spill relative to the closure of the jet fuel USTs at this building. Because of the above issues, this area was investigated during the Phase II ESA. This is considered a Recognized Environmental Condition. Note 1	Yes	Yes
Electrical Substation (IRP Site SS-44)	An electrical substation (referred to as IRP Site SS-44) is located on the far southern extent of the Project area. According to the Record of Decision (ROD), multiple spills of polychlorinated biphenyl (PCB) containing dielectric fluids have occurred. Multiple investigations and remedial actions have occurred. Because it is an active electrical facility, PCB impacted soils remain. Groundwater use is prohibited. Contaminated soil cannot leave the site limits. The USAF must be notified before excavation work. The site can only be used for industrial, commercial, and non-residential use. Since this area has previously been investigated and controls are defined, no further Phase II investigation is required. This is considered a Controlled Recognized Environmental Condition. Note 2	No (adjacent)	No
Fire Protection Training Area (FPTA)	The buildings to the north of the Project area have been associated with fire training. Multiple Fire Protection Training Area's (FPTA's) have been built on this area with soil remediation activities occurring before and after construction. The FPTA included several USTs, with spills associated with their closure. However, soil remediation for petroleum impacts has been performed, and the spills are considered Historical Recognized Environmental Conditions. Note 3 Fire suppressants containing PFCs were utilized in this area, resulting in groundwater contamination. The PFC concentrations exceed the project action limits (PAL) and NYSDEC Guidance Values. The PFC groundwater contamination is considered a Recognized Environmental Condition. Note 1 The Record of Decision (ROD) for the former FPTA includes an institutional control (IC) requiring a soil vapor intrusion (SVI) assessment prior to the construction of future buildings. This IC is considered a Controlled Recognized Environmental Condition. Note 2 No construction is taking place in the FPTA area. Phase II investigationwas not recommended. The USAF plans to undertake a RI to determine the nature and extent of PFC impacts at the FPTA.	No (adjacent)	No

Note 1 – Recognized Environmental Condition: the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat to the environment

Note 2 – Controlled Recognized Environmental Condition is a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional, controls, or engineering controls)

Note 3 - Historical Recognized Environmental Condition (HREC): a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

Source: Phase I ESA, C&S Engineers, Inc., October 2022 & March 2023

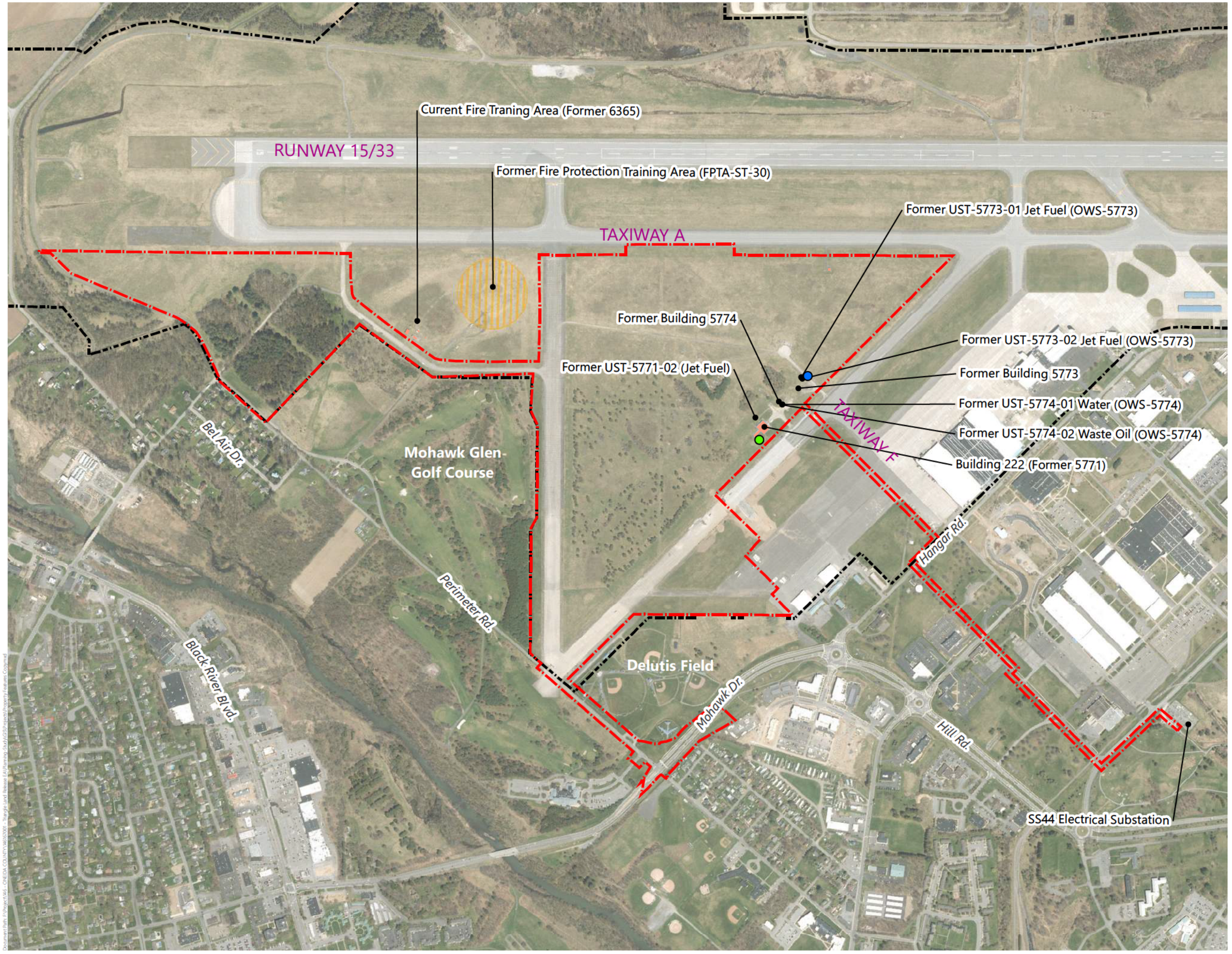


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Figure 4.23

Potential Areas of Concerns

- Proposed Project Area/ Construction Limits
- Buildings
- Airport Property Line
- Former Fire Protection Area
- Temporary Monitoring Well
- Monitoring Well

AOI - Area of Interest
UST - Underground Storage Tank
AST - Aboveground Storage Tank
OWS - Oil Water Seperator

N

0 425 850 1,700 Feet

1 in. = 850 ft.
When printed at 11 in. by 17 in.

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Sources: ESRI World Imagery; Parcels from Oneida County; Created by C&S Engineers, Inc.,

Solid Waste

Solid waste is disposed offsite at the Oneida-Herkimer Solid Waste facilities. Categories of waste acceptable for disposal at the landfill include solid waste generated by households, commercial establishments and industries, construction and demolition debris, sludge, and residues from recycling, composting, incineration, or other waste processing technologies. Wastes not accepted at the landfill include regulated hazardous waste, bulk liquids, radioactive waste and any other waste types prohibited by state and federal regulations. The estimated site life for the landfill is 76 years based on the current amount of waste that is generated annually within Oneida and Herkimer Counties.[47]

Pollution Prevention

The Airport has a State Pollutant Discharge Elimination System (SPDES) Permit issued by the New York State Department of Environmental Conservation under the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of stormwater that might contain traces of harmful pollutants. In addition, the County is responsible for applying for a SPDES General Permit for Construction Activity that regulates potential pollution sources and harmful erosion.

4.9.2 Environmental Consequences

No Action Alternative

The No Action Alternative does not involve development. Therefore, no impacts to hazardous materials, solid waste, or pollution prevention are expected.

Proposed Project

Hazardous Materials

Based on the results of the Phase I ESAs with respect to the scope of the Proposed Project; the area around/under Building 222 (Former Building 5771) and former Building 5773 were identified to be areas where impacted materials could be present. As such, a Phase II ESA was performed. Evidence of soil contamination, such as detectable PID readings, staining, or petroleum odors were not observed. Low-level SVOCs are present in the groundwater. While the laboratory data indicates that soils around and under Building 222 meet Unrestricted Use SCOs, previous reports indicate that contaminated soil may be present under the building. The building also has a floor drain system and trenches associated with historical testing and jet powered aircraft exhaust. It is possible that fuel or petroleum contaminated soil is present in or under the drain/trench structures.

According to USAF documents, PCB impacted soil is present within the far southern extent of the Project area (electrical substation). Groundwater use is prohibited. Contaminated soil cannot leave the site limits. The USAF must be notified before excavation work. The site can only be used for industrial, commercial, and non-residential use.

According to USAF documents, PFC (PFAS/POFA) impacted soil and groundwater is present at the former FPTA which is located adjacent to the Project area. A base wide evaluation to identify potential non-AFFF sources of PFAS that may have been used at the base is currently ongoing, but results are not available at this time. Due to the Proposed Project's location, there is a potential that PFOS/PFOA soil and groundwater contamination could extend into the Project area. Construction activities will involve ground disturbance up to 20 feet. Based on a recently completed soil borings depth to groundwater is 15 to 18 feet.

[47] Landfill Plan | Oneida-Herkimer Solid Waste Authority (ohswa.org)

Solid Waste

Increases in solid waste generation and disposal are anticipated for new facility operations (manufacturing, UAS/R&D, manufacturing/R&D, aeronautical use for manufacturing related to UAS/advanced air mobility (AAM) technologies, associated office space), and construction activities. Typical waste generated from industrial/manufacturing facilities include plastic, scrap metal, industrial foam, old corrugated cardboard. Typical waste generated from office spaces and employees include trash, mixed paper products, food scraps, plastics, and general waste (coffee cups, Styrofoam plates).

In addition to facility operations, solid waste will be generated from construction activities. Typical waste generated from construction activities include asphalt, concrete slabs, buildings, and land clearing debris (soil, rocks, timber, vegetation).

All solid waste generated from the Proposed Project will be disposed of at the Oneida-Herkimer Regional Landfill. This landfill is a permitted facility that can accept non-hazardous residential, commercial, and industrial waste and construction and demolition debris. According to the Solid Waste Management Permit, the approved design capacity of solid waste is 1,000 tons per day[48].

Pollution Prevention

Pollution prevention is any practice that reduces, eliminates, or prevents pollution at its source and prior to recycling, treatment, or disposal[49] There are many ways to reduce or prevent pollution through cost-effective changes in production, operation, use of raw materials, conserving landfill space/disposal capacity, energy, and natural resources and decreasing pollution. No significant impacts to pollution prevention are anticipated since significant changes to existing pollution prevention practices are not anticipated and a NYSDEC General Permit for Stormwater Discharges from Construction Activities will be obtained. The permit requires procedures to prevent erosion, as well as to prevent and respond to spills, leaks, and other releases.[50]

4.9.3 Mitigation

Hazardous Materials

If hazardous substances, contaminated soils, or other regulated materials are encountered during any phase of construction, they will be handled using best management practices (BMPs) and complying with FAA Order 1050.10D, Environmental Pollution Control and Abatement at FAA facilities (FAA, 2015). The following mitigation measures or BMPs are recommended to minimize or avoid impacts related to hazardous materials:

- **Hazardous Material Assessments –** Building demolition will be performed consistent with state and local regulations. Prior to demolition, hazardous building materials (e.g. asbestos, lead-paint, fluorescent lighting, drums, etc.) will be inventoried, tested, and disposed properly. Uncontaminated building materials (e.g. wood, concrete, sheetrock, etc.) will be disposed of at a NYSDEC permitted construction and demolition (C&D) debris facility.
- **Dust Abatement Program –** Project contract specifications would include a dust abatement program to minimize potential public health impacts associated with exposure to contaminants in soil dust.
- **Potential to Encounter Physically Contaminated Soils or Groundwater during Construction** – Contract specifications would require that a contingency plan be prepared if evidence of potential soil or groundwater contamination (e.g. discoloration, sheen, and odors), debris, or buried storage containers are encountered during design or construction of project components. The plan would contain procedures

[48] KM_C554e-20190419131244 (ohswa.org)
[49] P2: Pollution Prevention- Technical assistance for businesses to be environmentally sustainable and reduce costs (epa.gov)
[50] http://www.dec.ny.gov/chemical/43133.html

for sampling and analysis of potentially hazardous substances, including use of a photoionization detector. The required handling, storage, and disposal methods would depend on the types and concentrations of chemicals identified in the soil. However, soil shall be handled and disposed of consistent with local, state, and federal regulations. Any needed site investigations or remediation would comply with applicable laws and be coordinated with the appropriate regulatory agencies. In addition, the NYSDEC 24-hour Spill Hotline will be notified if contaminated materials are encountered.

- **Potential to Encounter PFC Contaminated Soil, Sediment, Surface Water, or Groundwater during Construction** – There are no existing reports that indicate if PFC contamination from the former FPTA has migrated to the Project area, which is located hydraulically cross-gradient. A full base-wide RI for PFAS is now required under CERCLA. However, scoping for the RI has not begun yet and the timing of when information will be available is not known. As a result, coordination with the Air Force, NYSDEC, NYSDOH, and EPA prior to, during, and after construction will be required and is critical regarding the potential for encountering PFAS. Coordination activities may include but are not limited to the following:
  - Results of additional studies and investigations,
  - Responsibilities of the parties involved,
  - Protocols for sampling and analysis of media,
  - Handling, storage, and disposal methods for suspected or documented contaminated media,
  - The need and scope of mitigation or management plans.
- **Health and Safety Plan –** A project-specific Health and Safety Plan, applicable to all excavation activities in the areas around current Building 222 (former Building 5771), former Buildings 5773 and 5774, and the electrical substation would be prepared to establish policies and procedures to protect workers and the public from potential hazards posed by hazardous materials. The plan would be prepared according to Federal and State OSHA regulations and submitted to the USAF as well as other agencies having jurisdiction before site activities could precede.
- **Removal of USTs** – If unknown USTs are discovered during construction, work in the area would stop to allow the UST, associated piping, and impacted soil to be removed by a licensed and experienced UST removal contractor. The UST and contaminated soil would be removed in compliance with applicable county and state requirements governing UST removal.
- **Groundwater Monitoring Wells –** An existing groundwater monitoring well on the east side of former Building 5773 and a temporary groundwater monitoring well on the southwest corner of Building 222 were identified during Phase I ESA activities. If the well is no longer needed, it shall be decommissioned by a qualified environmental drilling firm consistent with NYSDEC or USEPA requirements. If the USAF indicates the well must remain, the contractor will be required to protect the well.
- **Hazardous Materials Handling –** Consistent with requirements of the Stormwater Pollution Prevention Plan, (SWPPP) the construction contractor would be required to implement BMPs for handling hazardous materials onsite. The use of construction BMPs would minimize negative effects on groundwater and soils, and would include the following:
  - All hazardous materials would be stored, labeled, and disposed of in accordance with state and local regulations. The contractors would also be held responsible for reporting any discharges of hazardous materials or other similar substances during construction.
  - Spill control and countermeasures, including employee spill prevention/response training would be implemented.
  - Overtopping of construction equipment fuel gas tanks would be prohibited.
  - During routine maintenance of construction equipment, grease and oils would be properly contained and removed.

- Discarded containers of fuels and other chemicals would be properly disposed of.

- **Recycling and Disposal of Oil and Other Solvents –** Oil and other solvents used during maintenance of construction equipment would be recycled or disposed of in accordance with applicable regulatory requirements. All hazardous materials would be transported, handled and disposed of in accordance with applicable regulatory requirements.
- **Potential Accidental Release of Hazardous Materials –** In the event of an accidental release of hazardous materials during construction, containment and clean up would occur in accordance with applicable regulatory requirements.
- Contract specifications would require that a contingency plan be prepared in the event that evidence of potential soil or groundwater contamination (e.g., discoloration, sheen, and odors), debris, or buried storage containers are encountered during design or construction of the Proposed Project.
- USAF, NYSDEC, and NYSDOH will be notified and coordinated with regarding work adjacent to and within the electrical substation. Earthwork in this area will be performed by a qualified environmental contractor.
- Construction contractors and subcontractors will need to comply with all Federal and State regulations and guidance related to hazardous substances that will likely be encountered in soil and groundwater at the construction site, especially with regard to PFAS.

Solid Waste

The following measures are recommended to minimize solid waste impacts.

- Stockpile soil onsite for future reuse. If physically contaminated soil is encountered, it will be disposed of at a NYSDEC permitted solid waste landfill.
- Floor drains and trenches will be cleaned prior to demolition. The contents will be tested and disposed of consistent with state and federal regulation.
- Building demolition will be performed consistent with state and local regulations. Prior to demolition, hazardous building materials (e.g. asbestos, lead-paint, fluorescent lighting, drums, etc.) will be inventoried, tested, and disposed of properly. Uncontaminated building materials (e.g. wood, concrete, sheetrock, etc.) will be disposed of at a NYSDEC permitted construction and demolition (C&D) debris facility.
- Tree removal activities will be conducted by a licensed and insured tree removal contractor. Except for vegetative matter that may be spread on site for decomposition, all materials, such as salvageable timber (lumber), firewood, and woodchips for landscaping or pellets will be recycled, removed, or transported off site by the contractor, as specified in the design plan.
- Solid waste will be recycled by the contractor where practicable and the remainder will be disposed of off-site by the contractor consistent with federal, state and local regulations.

Pollution Prevention

The following pollution prevention measures are recommended:

- Hazardous materials management (shipping and storage) will comply with all federal, state, and locate regulations.
- All hazardous wastes will be accumulated, stored, and disposed in a manner which avoids release to the environment and meets federal, state, and local regulatory requirements in accordance with FAA Order 1050.1D, *Environmental Pollution Control and Abatement at FAA Facilities.*

- Solid waste accumulated by FAA facilities will be stored, collected, and disposed of in accordance with applicable federal, state, and local requirements, in accordance with FAA Order 1050.1D.

4.9.4 Significant Threshold and Conclusions

The FAA has not established a significance threshold for hazardous materials, solid waste, or pollution prevention. However, it has identified factors to consider in evaluating the context and intensity of the potential environmental impacts. These factors include situations in which the Proposed Project would have the potential to:

- Violate applicable federal, state, tribal, or local laws or regulations regarding hazardous materials and solid waste management.
- Involve a contaminated site (e.g., a site listed on the National Priorities List).
- Produce an appreciably different quantity or type of hazardous waste.
- Generate an appreciably different quantity or type of solid waste or use a different method of collection or disposal and/or would exceed local capacity.
- Adversely affect human health and the environment.

The Proposed Project may involve the disturbance of contaminated materials. However, hazardous material impacts will be minimized below significant impact thresholds with the incorporation of the recommended mitigation measures identified above, and use of construction best management practices. It is expected that regional facilities have adequate capacity to accommodate the additional solid waste, and all necessary federal, state, and local permits will be obtained prior to construction activities. As a result, there will be no significant hazardous materials, solid waste, or pollution prevention impacts.

4.10 Land Use and Zoning

Airport development projects have the potential to cause off-airport land use impacts. The compatibility of existing and planned land uses within the vicinity of an airport is usually associated with noise impacts. In addition to the impacts of noise on land use compatibility, other potential impacts of Federal Aviation Administration (FAA) actions may also affect land use compatibility (e.g., disruption of communities, relocation, induced socioeconomic impacts, land uses protected under Section 4(f) of the U.S. Department of Transportation [DOT] Act). The impacts on land use, if any, should be analyzed and described under the appropriate impact category with any necessary cross-references to the Land Use section of the National Environmental Policy Act (NEPA) document to avoid duplication.

[redacted]

For airport actions, the Land Use section of the environmental document should include documentation to support the required airport sponsor's assurance under 49 U.S. Code (U.S.C.) § 47107(a)(10) that appropriate action, including the adoption of zoning laws, has been or will be taken, to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including landing and takeoff of aircraft. The assurance must be related to existing and planned land uses.

4.10.1 Affected Environment

Land Use

Based on recent aerial imagery, the Project area contains vacant land, areas of abandoned pavement, and two structures (hush house and TACAN building). North of the Project area contain portions of the Airport (runways and taxiways). West of the Project area contains a golf course, Perimeter Road, vacant land, and one small residential area. South of the Project area contains the Delutis Ball Field, vacant land, Mohawk Drive, a medical facility, portions of the Airport (taxiways and aircraft parking apron), and the Griffiss Sculpture Park. East of the Project area contains primarily the Airport (runways, taxiways, aircraft parking apron, and hangars), vacant land, and commercial/industrial development.

Land use based on NYS tax parcel data classify Airport property as a public service use, and adjacent areas as recreation and entertainment, community services, industrial, vacant land, commercial, and residential (**Figure 4.24**).

Local Land Use Plans

Local land use plans can provide context regarding the planned long-term land use goals of local municipalities. The following land use plans from the City of Rome and Oneida County were found to provide land use information specific to the Project area.

City of Rome: *The City of Rome Comprehensive Action Plan* outlines a strategic roadmap for the development and growth of the City of Rome, addressing various aspects such as economic opportunity, infrastructure improvements, community revitalization, and environmental sustainability. Specifically, this plan outlines seven community goals and corresponding proposed projects that will enhance the City's tax base by encouraging new investment. Several aspects of the Plan align with the purpose of the Proposed Project, including:

- The City has established the goal (Goal 2) of becoming the most business-friendly community in New York State through creative partnerships and by achieving a technology-oriented economic development strategy. Increased business development and job creation at the Griffiss Business and Technology Park is cited as integral to achieving this goal. Additionally, the Griffiss Business and Technology Park is indicated as providing 3,506 acres of developable land that offers considerable capacity for new and industrial development.
- The City has established the goal (Goal 5) of maintaining and expanding a 21st century municipal infrastructure that is an incentive for housing and economic development goals. An action identified to achieve this goal was to "encourage the relocation of the Oneida County Airport to Griffiss" (Action 5.3). This action was achieved by the City in 2006 when operations from the Oneida County Airport were transferred to Griffiss International Airport.

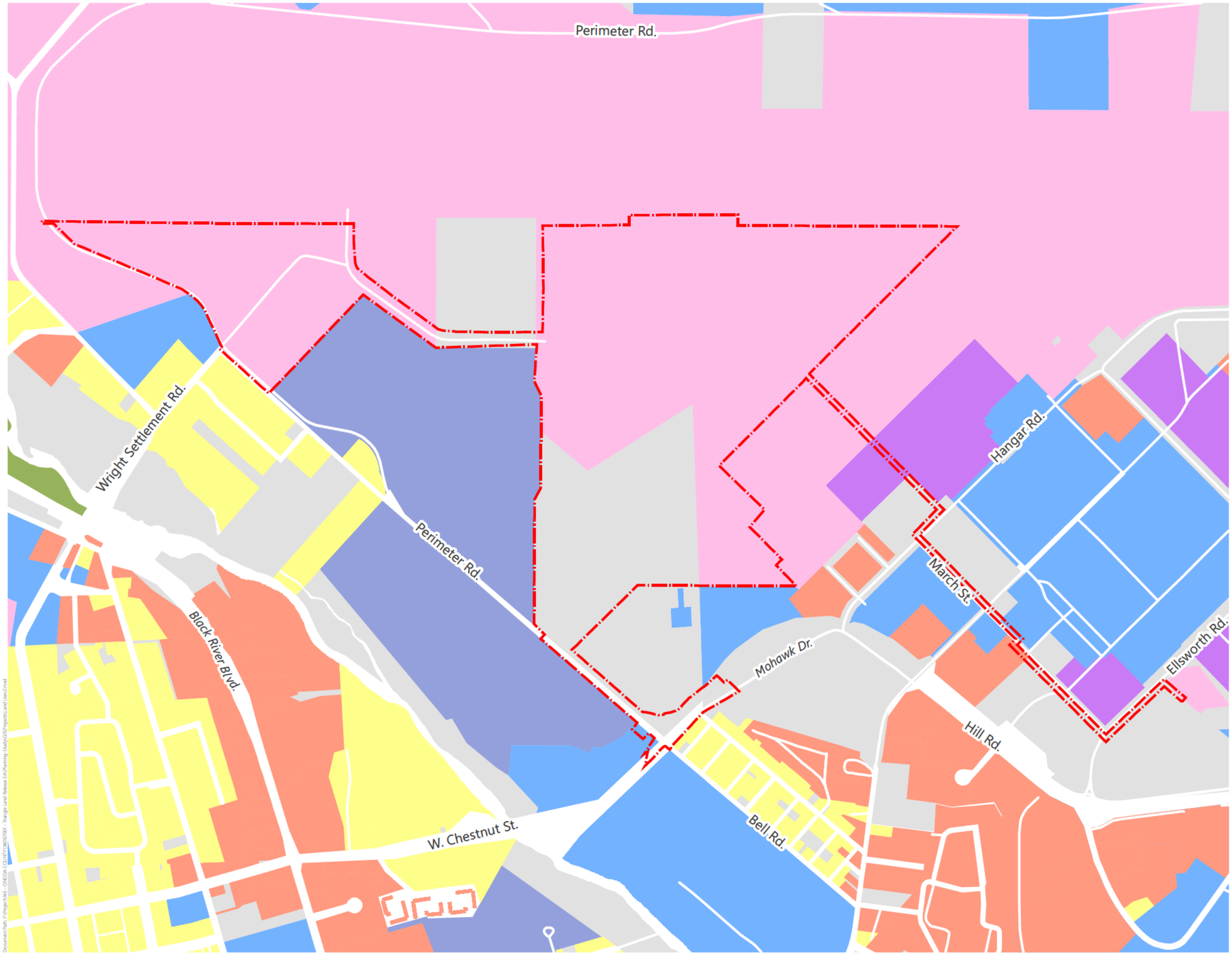

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Figure 4.24

Land Use

Proposed Project/Construction Limits

NYS Property Land Use Type

- Agricultural
- Residential
- Vacant Land
- Commercial
- Recreation and Entertainment
- Community Services
- Industrial
- Public Services
- Wild, Forested, Conservation Lands, and Public Parks

N

0 425 850 1,700 Feet

1 in. = 850 ft.
When printed at 11 in. by 17 in.

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Source: Land use from NYS Tax Parcels Public layer avialable from NYS GIS Clearinghouse; Streets from US Census Bureau 2022 TIGER
Created by C&S Engineers, Inc., 2024

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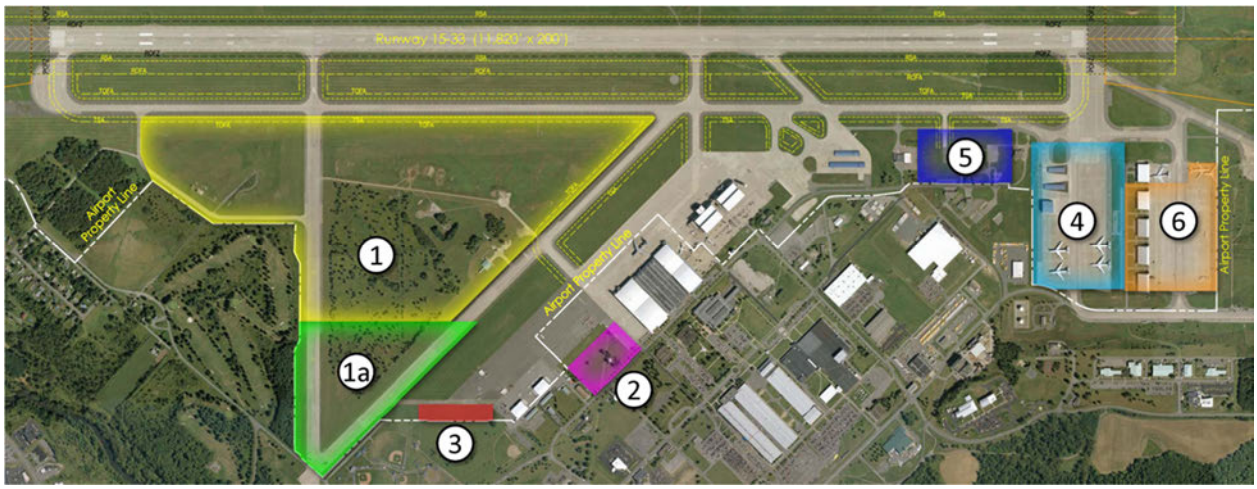
Oneida County: The Griffiss Land Development Corporation and County of Oneida Proposed Plan for the Development of an Airport Business & Industrial Park[51], as well as the Griffiss International Airport Business Plan[52] identify Airport land property and how it will be recognized in the long-term as a basis for recruitment and attraction efforts by the Airport and surrounding areas.

The Griffiss International Airport Business Plan recommends "a plan of action to improve the Airport's financial performance and long-term viability as a provider of jobs and general aviation services to Oneida County and the broader Utica-Rome metropolitan area." Furthermore, this plan presents an overall strategic direction and 5-year plan for the Airport to further the Airport's vision as a nexus of economic activity for the region.

The Griffiss International Airport Business Plan summarizes several development areas at the Airport that are proposed for future development (**Figure 4.25**). The proposed project is located within Proposed Development Areas 1 and 1A discussed in this plan.

- Development Area 1 is the 201.6-acre parcel of land located west of Taxiway A, north of Taxiway E, and south of former Taxiway B. This site is recommended for development of aviation-related uses due to its proximity to airport infrastructure and significant amount of available space.
- Development Area 1A is located west of Development Area 1 in an area that currently has no taxiway access. The plan recommends this area for non-aviation related development or support space for uses in Development Area 1.

Figure 4.25 - Potential Development Sites



Source: Griffiss International Airport Business Plan, May 2010

Zoning

As shown on **Figure 4.26**, the Project area is located entirely within the City of Rome Griffiss Business (GB) redevelopment district zoning. Per the City of Rome's Zoning Code, the purpose of the GB redevelopment district is "*to support the high quality, state-of-the-art business and technology center, within a work environment that blends*

[51] *https://ocgov.net/assets/Airport/Docs/Airport-Land-Development-Plan.pdf*
[52] https://ocgov.net/assets/Airport/Docs/Griffiss-Airport-Business-Plan.pdf

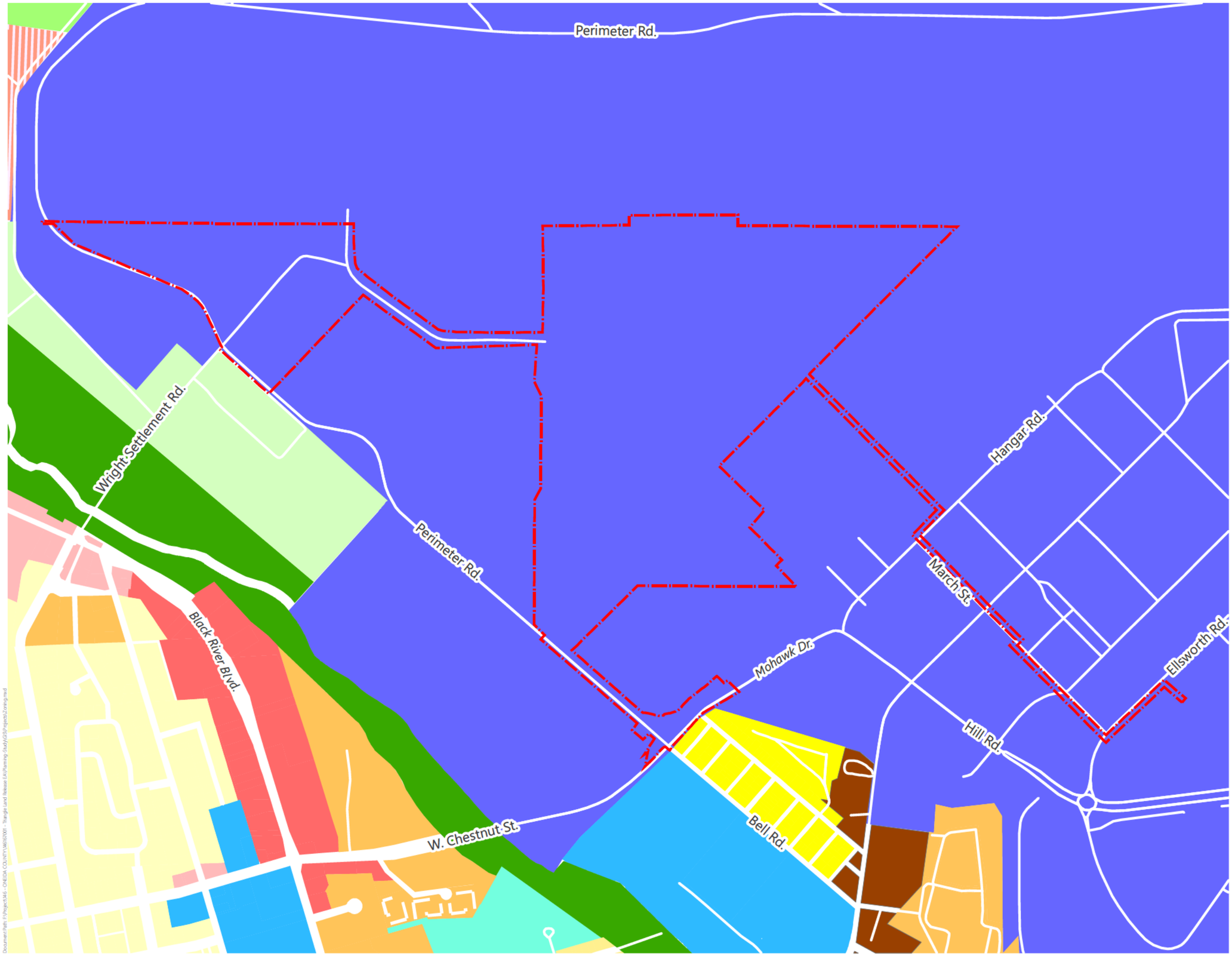


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Figure 4.26

Zoning

- Proposed Project/Construction Limits
- AA Airport
- AG
- R-R Rural
- R-1-8 Single-Family
- R-1-5 Single-Family
- R-2 Single-Family
- R-3 Multi-Family Residential
- C-1 Local
- C-2 General
- WR Woodhaven
- I Institutional
- GB Griffiss
- NA Natural Areas
- OS Open

N

0 425 850 1,700 Feet

1 in. = 850 ft.
When printed at 11 in. by 17 in.

GRIFFISS INTERNATIONAL AIRPORT

EA for Land Release and Airport Business Park Development

Source: Rome Zoning 2018 service layber by dpgillen. Updated by C&S using Rome, New York Chapter 80-Zoning Code Maps 23.6 City Zoning Map (Inside District) and 23.6 City Zoning Map (Outside District); Streets from US Census Bureau 2022 TIGER
Created by C&S Engineers, Inc., 2024

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operational efficiency with a pleasing atmosphere."[53] To further address the different functional and aesthetic character areas within the Griffiss Business and Technology Park, the GB district is divided into sub-districts, **Figure 4.27**. The purpose of these sub-districts and permitted used are summarized in **Table 4.13**.

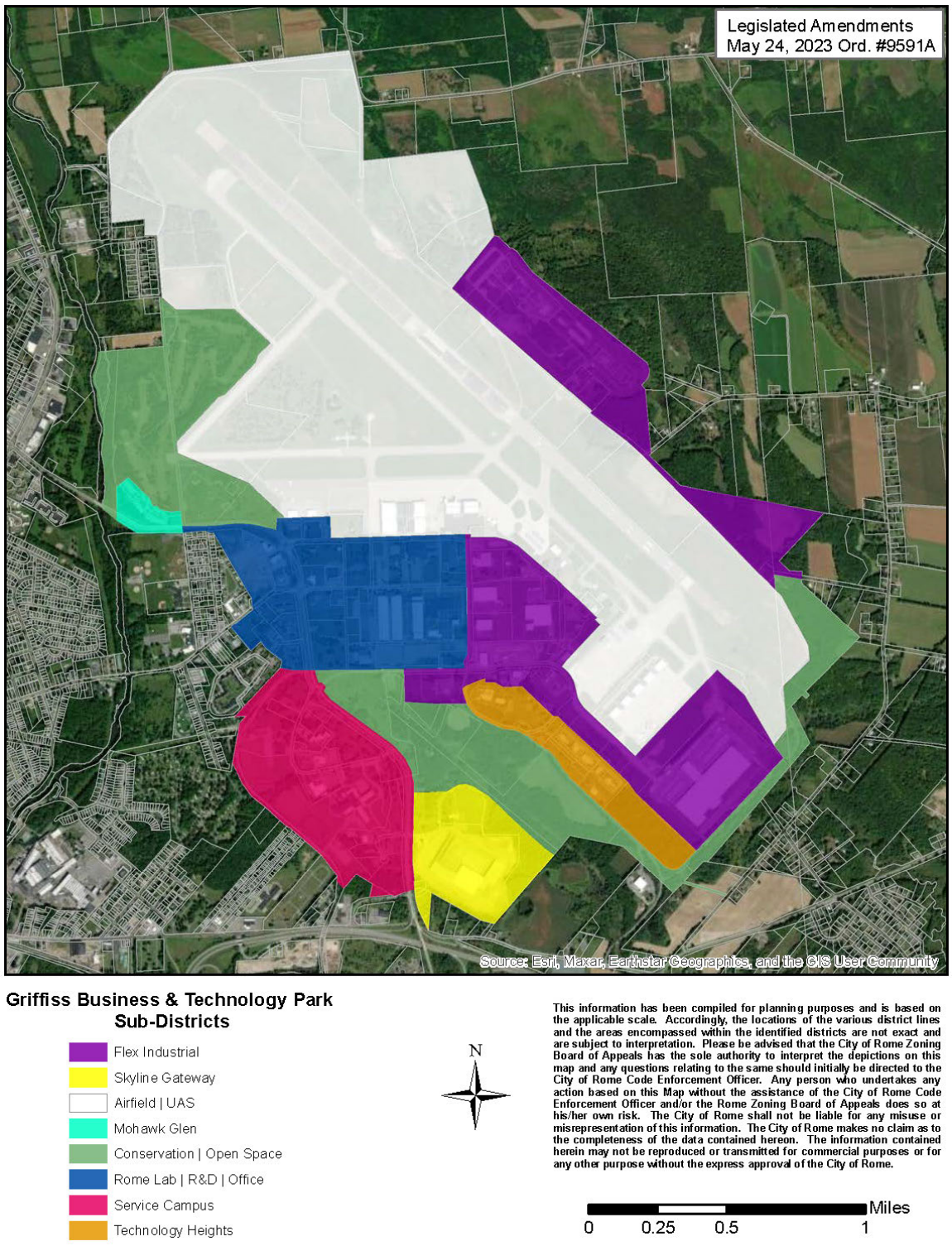
Table 4.13 – Summary of Griffiss Business (GB) Redevelopment Sub-Districts Zoning

GB Sub-District	Purpose	Permitted Uses
GB-RL: Rome Lab/R&D/Office Campus	To promote the expansion of Rome Lab and augment the cyber ecosystem. Should support continued use and viability of remaining DoD functions, including mixed-use housing development to attract and retain talent in the community.	Bank/financial institution; Brew pub; Day care center; Dwelling, above the ground floor; Dwelling, live/work; Gas station; Healthcare facility; Hotel; Industrial design; Medical/dental clinic; Medical marijuana dispensary; Microbrewery/distillery/winery; Office; Outdoor dining; Park; Personal service; Research and development; Restaurant; Retail goods establishment; Solar energy systems, Tier 1; and Tavern.
GB-FI: Flex Industrial Development	Reserved for high tech and light industrial uses.	Industrial design; Industrial, artisan; Industrial, general; Office; Research and development; Specialized food production; Solar energy systems, Tier 1; and Warehouse.
GB-SG: Skyline Gateway Development	Gateway to the Griffiss Business and Technology Park. Emphasis should be placed on flexibility of development as a corporate campus/complex where office, hi-tech manufacturing, research and development, warehousing, logistics and/or industrial suppliers can be co-located. Large parcels are encouraged.	Amusement facility—Indoor; Amusement facility—Outdoor; Bank/financial institution; Brew pub; Drive-through facility; Freight terminal; Healthcare facility; Hotel; Industrial design; Industrial, general; Live entertainment; Medical/dental clinic; Office; Outdoor dining; Reception facility; Research and development; Restaurant; Retail goods establishment; Specialized food production; Solar energy systems, Tier 1; Tavern; Warehouse; and Wholesale.
GB-MG: Mohawk Glen Development	Intended to support the reuse and expansion of existing support facilities and provide new opportunities for training, recreation, health/wellness and childcare development.	Brew pub; Convention center; Golf course/driving range; Healthcare facility; Medical/dental clinic; Medical marijuana dispensary; Micro-brewery/distillery/winery; Office; Park; Research and development; Restaurant; School—Trade or vocational; and Solar energy systems, Tier 1.
GB-SC: Service Campus	Intended to aid in the reuse and expansion of existing facilities in the sub-district to support other park activities and provide new opportunities for education, training, recreation, and limited commercial development.	Amusement facility—Indoor; Arts studio; Bank/financial institution; Day care center; Gas station; Healthcare facility; Hotel; Medical/dental clinic; Office; Park; Personal service; Residential care facility; Restaurant; School—Primary or secondary; School—College or university; School—Trade or vocational; and Solar energy systems, Tier 1.
GB-CV: Conservation Recreation	Delineates certain open areas of value to the public within the park.	Conservation area; Park; and Solar energy systems, Tier 1.
GB-TH: Technology Heights	Intended to accommodate cyber security and information assurance firms including large corporate firms, as well as smaller contractors and entrepreneurial startups.	Day care center; Office; Park; Research and development; School—Trade or vocational; and Solar energy systems, Tier 1.

Source: City of Rome New York, Chapter 80 Zoning Code, Article VIII. – GB Griffiss Business Redevelopment District Sec. 80-8.2 and Section 80-8.3. C&S Engineers, Inc. 2024.

53 https://library.municode.com/ny/rome/codes/code_of_ordinances?nodeId=PTIICICO_CH80ZOCO_ARTVIIIGBGRBUREDI

Figure 4.27 – Griffiss Business & Technology Park Sub-Districts



Source: Section 80-23.3. – Griffiss Business and Technology Park Development districts map.

4.10.2 Environmental Consequences

No Action Alternative

No development would occur with this alternative. Therefore, no impacts to existing land use or zoning are expected.

Proposed Project

Land Use

On Airport construction activities will convert vacant land to a mix of aeronautical and non-aeronautical development. Aeronautical uses include UAS/R&D buildings/hangers, UAS/AAM manufacturing hangars, aircraft parking apron, access roads and automobile parking areas. Non-aeronautical uses include manufacturing/R&D facilities, access roads, and automobile parking areas). Off-airport construction activities will not alter existing land uses. Specifically, current roadways will be improved with the construction of a roundabout at the intersection of Perimeter Road and Mohawk Drive. Utility corridors will be restored to existing conditions upon completion of construction (paved entrance roads, automobile parking areas, mowed lawn, or paved nature trails).

The Proposed Project will not adversely affect safe aircraft operations since it is located outside of airfield operations areas. Flight patterns associated with the proposed vertiport location have been developed as part of the RME federal UAS test site program (Airport has been a designated test site since 2013. All flights are directed by the Air Traffic Control Tower (ATCT). As a result, changes to existing flight patterns or airfield operations are not expected to be altered significantly.

The Proposed Project aligns with the long-term land use objectives and plans developed for the City of Rome, Oneida County, and the Mohawk Valley region by providing development opportunities, encouraging new investment, and growing the local tax base. The effects of the business park development on other environmental issues such as visual impacts, noise, habitat, etc., have all been evaluated in this EA, and found to have no significant impacts (Sections 4.3, 4.12, and 4.14). Therefore, no significant impacts to land use are expected.

Zoning

The majority of the Proposed Project will take place within the Airfield/UAS sub-district. Development of a roundabout will occur within the Rome Lab/R&D/Office Campus (GB-RL) and Conservation Recreation (GB-CV) sub-districts. Additionally, utility corridors will also be developed within these three sub-districts.

The City of Rome's Zoning Code does not explicitly state permissible or impermissible uses within the Airfield/UAS sub-district. However, uses in this area, on airport property are subject to FAA rules and regulations. Additionally, "uses that may interfere with airfield operations must be specifically approved by the FAA."[54]

Per the City of Rome's Zoning Code, utilities are permitted within all sub-districts of the GB zoning district. However, they are a special use and require special use approval. All new and rebuilt exterior on-site utilities such as drainage systems, sewers, gas lines, water lines, and electrical, telephone, and communications wires and equipment must be installed and maintained underground.[55]

Regarding development of the roundabout, the City of Rome's Zoning Code does not identify whether roundabouts are a permissible or impermissible use within the GB district. However, it is anticipated that development of the roundabout will occur within existing right-of-way property and in property that will be

[54] https://library.municode.com/ny/rome/codes/code_of_ordinances?nodeId=PTIICICO_CH80ZOCO_ARTVIIIGBGRBUREDI_S80-8.3US

[55] Ibid

acquired and transitioned to right-of-way for its development. Per *Section 80-1.5.-Exemptions*, "the provision of this code does not apply to land located within rights of way." *Article XXII.-Right-Of-Way and Access Standards*, discusses the purpose of right-of-way "to provide safe, convenient, and functional pedestrian, bicycle, and vehicular traffic flow."[56] Right-of-way and sidewalk design standards and dimensions of the proposed roundabout must be consistent and in alignment with those set forth by the city engineer.

Although the Proposed Project is compatible with the City of Rome Zoning Code, the County is working with the City of Rome to change the on-Airport development area to a Planned Unit Development designation. No significant impacts to zoning are expected since development will be consistent with the dimensional standards, set back requirements, height standards, etc. outlined in the Zoning Code.

4.10.3 Mitigation

The Proposed Project is considered compatible with local land use and zoning regulations. Therefore, no mitigation is required.

4.10.4 Significance Threshold and Conclusions

The FAA has not established a significance threshold for land use, and the FAA has not provided specific factors to consider in making a significance determination for land use in Exhibit 4-1 of FAA Order 1050.1F. A determination of significance is typically based on the significance of other impacts. The determination that land use impacts will be significant are normally dependent on the significance of other related impact categories, such as noise. Thus, mitigation activities proposed to address land use impacts would be discussed under the appropriate impact category and cross-referenced. In addition, an inconsistency with a state and/or local land use plan does not automatically result in a significant impact.

The Proposed Project would not cause a significant impact to or change to existing land use designations on or surrounding the Airport property. The Proposed Project does not include the type of development that would attract birds and wildlife (i.e., solid waste landfills, wastewater treatment facilities, spoil containment areas, etc.). Given this information, the Proposed Project would be consistent with local land use and zoning plans and considered a compatible use. Therefore, no significant impacts to land use are expected.

4.11 Natural Resources and Energy Supply

The NEPA regulations that address the use of energy and natural resources are discussed in FAA Order 5050.4B and FAA Order 1050.1F. [redacted]. Energy resources analyzed in this section include water supply, wastewater disposal, electricity, and fuel usage.

4.11.1 Affected Environment

Sanitary Sewage: Currently, sewer services are provided to the Airport and Business and Technology Park by the City of Rome Department of Public Works (DPW). Sanitary wastewater from the Airport and the Griffiss Business and Technology Park is conveyed to the City of Rome Wastewater Treatment Plant, located south of Highway 49, approximately 1.5 miles south of the Airport. There is an existing sanitary sewer manhole with an 8-inch diameter sanitary sewer main outlet tie-in point located south of the intersection of Mohawk Drive (NY Route 825) and Perimeter Road.

56 https://library.municode.com/ny/rome/codes/code_of_ordinances?nodeId=PTIICICO_CH80ZOCO_ARTVIIIGBGRBUREDI_S80-8.9UTTEFUSTTA

Water Supply System: Potable drinking water is supplied to the Airport and Griffiss Business and Technology Park by the City of Rome Department of Public Works (DPW). There is one 8-inch diameter water main tie-in point extending north to the Proposed Project site along the proposed Taxiway E extension. This water main is served by the existing pumping station and 500,000-gallon storage tank located at the southwest corner of March Street and Hangar Road.

Electric Service: The Griffiss Utility Services Corporation (GUSC) provides utility electric to the tenants of the Griffiss Business and Technology Park. Historically, this utility has delivered approximately 250 million pounds of steam per year and over 89 million kilowatt-hours of electricity.[57] Additionally, GUSC also purchases and distributes energy by GUSC Energy, Inc.'s biomass energy facility and a natural gas-fired steam plant located at the Griffiss Business and Technology Park. GUSC Energy, Inc., is a wholly-owned subsidiary of GUSC.[58] The existing GUSC Ellsworth Substation is located along Ellsworth Road south of the Airport and has 15-20 MW of power available.

Natural Gas Service: National Grid provides natural gas to the City of Rome. There is an existing 4-inch diameter natural gas main located on Hangar Road south of the Proposed Project.

A Public Services & Social Conditions Evaluation was completed for the Proposed Project and was used as the basis for assessment for this section (**Appendix L**). The evaluation identifies the organizations and departments that will provide public services to the Proposed Project and summarizes consultation with public utilities to determine if there are any potential issues or concerns regarding their ability to provide services to the Proposed Project.

4.11.2 Environmental Consequences

No Action Alternative

The No Action Alternative would have no impact because it would not change or otherwise alter natural resources or energy supplies at the Airport.

Proposed Project

Impacts are discussed in the Public Services & Social Conditions Evaluation (**Appendix L)** and summarized by category below.

Sanitary Sewerage: Operation of the new building facilities totaling 1.9 million SF (includes one 1,000,000 SF manufacturing building, four small manufacturing/R&D buildings ranging from 48,000 SF to 200,000 SF, four small UAS/R&D buildings totaling 100,000 SF, one 13,000 SF small aviation use hangar, and one 348,500 SF large aviation use hangar) will result in an increase in the discharge of wastewater into the sewer collection system because of employees. Coordination with the City of Rome DPW indicated the following elements are required for connection to the existing sanitary sewer system:

- An 8" diameter sanitary sewer main is proposed to service the Proposed Project.
- The proposed 8" diameter sanitary sewer main will tie into the existing sanitary sewer manhole in the intersection of Mohawk Drive and Perimeter Road.
- The proposed 8" diameter sanitary sewer main will be routed north to the Proposed Project within a proposed 50ft wide utility corridor on the west side of Perimeter Road.
- Sanitary sewer manholes will be spaced every 400 ft along the 8" diameter sanitary sewer main.
- Individual branch/service lines will be provided for each proposed building at the time of development for each site/building per State, County, and local standards/codes.

[57] Griffiss Utility Services Corporation. Operations. Accessible at: https://www.gusc.net/operations.asp (Accessed 11/21/22).
[58] GUSC Energy Inc. Welcome. Accessible at: http://guscenergy.com/ (Accessed 11/21/22).

Based on coordination with the City of Rome DPW, a preliminary analysis of the existing site utilities, and estimated demand for the Proposed Project, wastewater service will be provided with no negative impact to the system (**Appendix L**).

Water: Operation of the new building facilities totaling 1.9 million SF will result in an increase in the use of potable water as a result of employees. Coordination with the City of Rome DPW indicate the following elements are required for connection to the existing water system:

- A 12" diameter water main loop is proposed to service the Proposed Project.
- The proposed 12" diameter water main will tie into the existing 8" diameter water main that extends north to the Proposed Project.
- Fire Hydrants will be spaced every 500 ft along the 12" diameter water main loop.
- Individual branch/service lines and hydrants will be provided for each proposed building at the time of development for each site/building per City of Rome Fire Department and Department of Public Works requirements.

Based on coordination with the City of Rome DPW, a preliminary analysis of the existing site utilities, and estimated demand for the Proposed Project, water service will be provided with no negative impact to the system (**Appendix L**).

Electric: The Proposed Project would generate a need for additional electrical power for new building facilities (1.9 million SF overall). Electrical power is needed for cooling and power for indoor lighting, outdoor parking and security lighting, etc.). Coordination with GUSC indicated the following elements are required for connection to existing GUSC infrastructure:

- A 15 way 5" conduit electrical duct bank is proposed to service the Proposed Project.
- The proposed electrical duct bank will be routed north from the Existing Ellsworth Substation to the Proposed Project along March Street and Hangar Road within a 50ft wide proposed utility corridor.
- A new 15 kV switchgear will be required at the Proposed Project site ("Triangle Area").
- Individual branch/service lines will be provided for each proposed building at the time of development for each site/building per State, County, and local standards/codes.
- The existing Ellsworth Substation will need to be upgraded (new station transformer) in order to provide the required power for the Proposed Project.
- 20 MW of power is currently available, to accommodate the estimated 50 MW of power at full build out, an additional station transformer will be installed at the substation.

Based on coordination with GUSC (**Appendix L**), this amount of power will be provided by making upgrades to the existing electric distribution system (Ellsworth Substation) as proposed, and by purchasing additional power from National Grid as necessary. Upgrades to GUSC's existing electrical system are proposed in two phases. Design considerations from GUSC are ongoing and will continue to be coordinated throughout the duration of the Proposed Project.

Natural Gas: The Proposed Project would generate a need for additional natural gas for the proposed buildings (i.e., heating, and hot water). Coordination with National Grid indicated the following elements are required for connection to existing National Grid infrastructure:

- An 8" diameter natural gas main is proposed to service the Proposed Project.
- The proposed 8" diameter natural gas main will tie into the existing 4" natural gas main at the intersection of Hangar Road and March Street.
- The proposed 8" diameter natural gas main will be routed north to the Proposed Protect within the proposed 50ft wide utility corridor.

- Individual branch/service lines will be provided for each proposed building at the time of development for each site/building per State, County, and local standards/codes.

Other potential impacts depending on the location of underground utilities include the following:

- Relocation of Rome Baseball Association (RBA) concession stand, storage facility, and bullpen (Appendix Q, pages Q-150 to Q-157)
- Removal of portions of Griffiss International Sculpture Park Nature Trail (paved) and paved automobile parking

Based on coordination with National Grid, a preliminary analysis of the existing site utilities, and estimated demand for the Proposed Project, natural gas will be provided to the Proposed Project with no negative impact to the system (**Appendix L**).

4.11.3 Mitigation

Coordination with public utility providers indicated that with inclusion of the design elements above, negative impacts to existing utilities are not anticipated. In addition, mitigation measures recommended to minimize impacts to affected property owners include the following:

- Continued coordination with utility providers will occur through design of the Proposed Project.
- Replacement plantings at a 1:1 ratio for individual trees that may need to be removed during construction activities.
- Access to properties will be maintained at all times during construction activities.
- Directional boring and/or underground duct banks will be installed as close as possible to existing roads and within existing road rights-of-way.
- Site restoration to return disturbed areas to existing conditions (i.e., road pavements, grassed areas, automobile parking areas, etc.)
- Implementation of construction Best Management Practices (BMP's)
- Access to properties will be maintained at all times during construction activities.
- Maintain utility corridor as close to Perimeter Road, Ellsworth Road, March Street and Hangar Road as possible to minimize limits of disturbance.
- Portion of walking path around B52 Bomber site will be restored/relocated if impacted by construction activities.
- Rome Baseball Association (RBA) facilities will be relocated, or new facilities provided for the concession stand and storage and bullpen if impacted by construction activities.
- Construction during off-season (winter months) to avoid interruption of use of RBA activities and use of the Griffiss International Sculpture Park and associated amenities.
- If impacts to Griffiss International Sculpture Park Nature Trail take place, paved trail will be restored to existing conditions upon completion of construction activities.
- Excavator to mark proposed excavation site with flags prior to construction activities to minimize impacts to Griffiss International Sculpture Park Nature Trail and auto parking area.

4.11.4 Significance Threshold and Conclusions

The FAA has not established a significance threshold for natural resources and energy supply. The FAA has identified a factor to consider when evaluating the context and intensity of potential environmental impacts for natural resources and energy supply. This factor includes, but is not limited to, situations in which the proposed action or alternative(s) would have the potential to cause demand to exceed available or future supplies of these resources. For most actions, changes in energy demands or other natural resource consumption for FAA projects will not result in significant impacts. If an EA identifies problems such as

demands exceeding supplies, additional analysis may be required. Otherwise, it may be assumed that impacts are not significant.

According to Chapter 10 of the *Desk Reference*, the evaluation of impacts on energy supplies and consumable natural resources should consider whether and how a project plan could directly or indirectly increase demand on the following:

- The impacts to utilities servicing the area caused by changes in demand as a result of the action.
- Water sources (rivers, lakes, aquifers, etc.) and if they have the capacity to support a project's construction, operation, and maintenance.
- Fuel consumption.
- The impacts to consumable materials, especially scarce or unusual materials, in and around the study area.
- State or local rules, ordinances, or guidelines that apply to natural resources, energy supply, and any resulting by-products of increased usage of either resource.

The Proposed Project would not exceed available or future natural resource or energy supplies nor involve a need for unusual materials or those in short supply with the implementation of the improvements recommended above. Therefore, no significant impact to natural resources and energy supplies is anticipated.

4.12 Noise and Noise-Compatible Land Use

As described in Chapter 11 of the *Desk Reference*, noise is generally defined as unwanted sound. It may interfere with ordinary daily activities, such as communication and sleep, or cause annoyance. A person's reaction to noise varies according to the duration, type, and characteristics of the source; distance between the source and receiver; receiver's sensitivity; background noise level; and time of day. Noise may be intermittent or continuous, steady or impulsive, and it may be generated by stationary or mobile sources.

As discussed in **Section 3**, the Proposed Project assumes aeronautical hangars will be constructed for the purpose of R&D and testing of unmanned aerial systems (UAS) and similar emerging technologies. However, the Proposed Project is not anticipated to increase the number of forecast aircraft operations or change the fleet mix, airfield configuration, runway use, or flight patterns once operational. Therefore, the assessment of noise impacts for this EA includes an evaluation of previously prepared aircraft contours along with modeling noise levels from vehicular traffic and construction noise. **Appendix I** includes a Noise Technical Report prepared for the Proposed Project as well as the previously prepared noise assessment from the 2019 EA for Commercial Passenger Terminal Building.

The *Desk Reference* provides the FAA's policies and procedures to ensure agency compliance with NEPA, [redacted] and Department of Transportation (DOT) Order 5610.1C, *Procedures for Considering Environmental Impacts*. As noted in the *Desk Reference*, when FAA and/or airport actions required analysis of noise sources other than aircraft arrivals and departures, (e.g., projects with surface transportation improvements), the analysis should be performed in accordance with accepted methods and procedures of the appropriate modal administration. Since the main components of the Proposed Project include the construction of a business park development and associated roadway improvements, which is a surface transportation element, the noise analyses were performed in accordance with the Federal Highway Administration's (FHWA) federal traffic noise regulations (codified at Title 23 Code of Federal Regulations Part 772[59]) and associated guidance document[60]. 23 CFR 772 requires state highway agencies to develop noise policies consistent with federal regulations. Since the Proposed Project is located within Rome, New York, the traffic, and construction noise assessments were performed in accordance with New York State

[59] https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/
[60] https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/

Department of Transportation's (NYSDOT) highway traffic noise policy, included within Section 4.418 of their Transportation Environmental Manual (TEM)[61].

4.12.1 Affected Environment

Some land uses are more susceptible to noise impacts than others. Normally, noise sensitive areas include residential, educational, health, and religious structures and sites, and parks, recreational areas, areas with wilderness characteristics, wildlife refuges, and cultural and historical sites. Airport noise levels are generally considered compatible with most industrial, commercial, and agricultural uses. Project areas that contain or are adjacent to noise sensitive areas have the potential to be impacted by noise.

For informational purposes and to understand how airport noise affects the surrounding land uses, the noise analysis contained in the 2019 Environmental Assessment for a Commercial Passenger Terminal Building at the Airport was reviewed (**Appendix I**, pages I-48 to I-65). The evaluation modeled operations from the base year of 2017 (45,566 operations) and the forecast year of 2022 (48,287 operations) using the FAA Aviation Environmental Design Tool (AEDT Version 2c Service Pack 1) and the FAA's Day-Night Average Noise Level (DNL) metric. The 65 DNL noise contour extended off-airport property to the northeast on vacant land owned by the county industrial development agency which is a compatible land use (**Appendix I** pages I-67 and I-68). The analysis noted there would be no noise sensitive areas that would experience an increase in noise of DNL 1.5 dB or more at or above DNL 65 dB noise exposure when compared the no-action alternative and no significant noise impacts occurred.

The traffic noise analysis for the Proposed Project was conducted using SoundPLAN, a widely accepted computer noise model for computing outdoor sound levels associated with ground-based noise sources. The data from almost 300 noise receptors surrounding the Project area were analyzed and included residential, recreational, institutional, and commercial land uses. **Appendix I** includes a location map for the noise-sensitive receptors (**Appendix I**, Figure 4 on pages I-21 to I-25), provides information regarding each receptor (**Appendix I**, Table 3 on page I-20 and Table 10 on page I-39 to I-46) and shows that the existing (2022) range of predicted traffic noise levels is 34-69 dbA, L_{eq}[62] with no receptors impacted by traffic noise.

4.12.2 Environmental Consequences

No-Action Alternative

No development will occur with the No-Action Alternative. Therefore, no impacts to noise are expected.

Proposed Project

Aircraft Noise: The Proposed Project involves the construction of aeronautical hangars for the purpose of R&D and testing of unmanned aerial systems (UAS) and similar emerging technologies and may involve a minor increase in operations associated with testing. However, the Proposed Project will not change the number or type of aircraft operating at the Airport. Furthermore, current aircraft operations have decreased from the previous aircraft operations used as part of the noise assessment within the 2019 EA for Commercial Passenger Terminal Building. The FAA Terminal Area Forecast (TAF) released in January 2024 indicates 28,519 annual operations occurred in 2022 and forecasts 33,674 annual operations in 2036, which are significantly below the future condition operations modeled within the 2019 EA (48,287 operations). Given that current operations are approximately 14,000 lower than the forecast operations evaluated in the 2019 EA, the minimal increase in operations from testing of UAS and similar emerging technologies would have no impacts to noise sensitive areas based on aircraft noise.

[61] https://www.dot.ny.gov/divisions/engineering/environmental-analysis/manuals-and-guidance/epm

[62] dBA = hourly, A-weighted, equivalent sound level in decibels; $L_{eq}(h)$ = value or level of a steady, non-fluctuating sound that represents the same sound energy as the actual time-varying sound evaluated over the same time-period, typically an hour

Traffic Noise: As noted in **Appendix J – Traffic Assessment**, the Proposed Project is estimated to generate over 600 vehicles during each typical commuter AM and PM peak hour. These volumes distributed throughout the Project area were used to analyze potential noise impacts due to the Proposed Project. The range of predicted traffic noise levels increased slightly from 32-70 to 33-71 dBA, $L_{eq}(h)$ with no additional increase in noise levels to the one residential property on Tompkins Avenue that would be approaching the NYSDOT noise abatement criteria.

Temporary Construction Noise: The Proposed Project would cause a temporary increase in noise during construction activities related to the operation of commercial power tools, trucks, and heavy equipment. Noise levels would vary dependent on the type of equipment, the duration of operation, and the time of operation. The FHWA's Roadway Construction Noise Model (RCNM) was used to predict on-site construction activity noise. The model uses a representative average maximum sound level (L_{max}) in dBA at 50 feet and usage factor for each piece of equipment. Tables 5 (page I-28) and 6 (I-29 to I-30) in **Appendix I** shows the Proposed Project construction schedule and the anticipated type of equipment with their average L_{max} at 50 feet. NYSDOT noise policy states that a construction noise impact will not normally occur when L_{eq} noise levels are below 80 dBA. The focus for construction noise impact evaluations were limited to the residences south of Mohawk Drive (Route 825) between Bell Road and Broadway, residences within the 143 Air City Lofts Community, residences west of Perimeter Road along Bell Road North and Bel Air Drive, scattered residences north and east of RME along Butternut Road, Wright Settlement Road, and Old Floyd Road, as well as recreational uses at the baseball fields at Perimeter Road and Mohawk Drive (Route 825) and Mohawk Glen Golf Course.

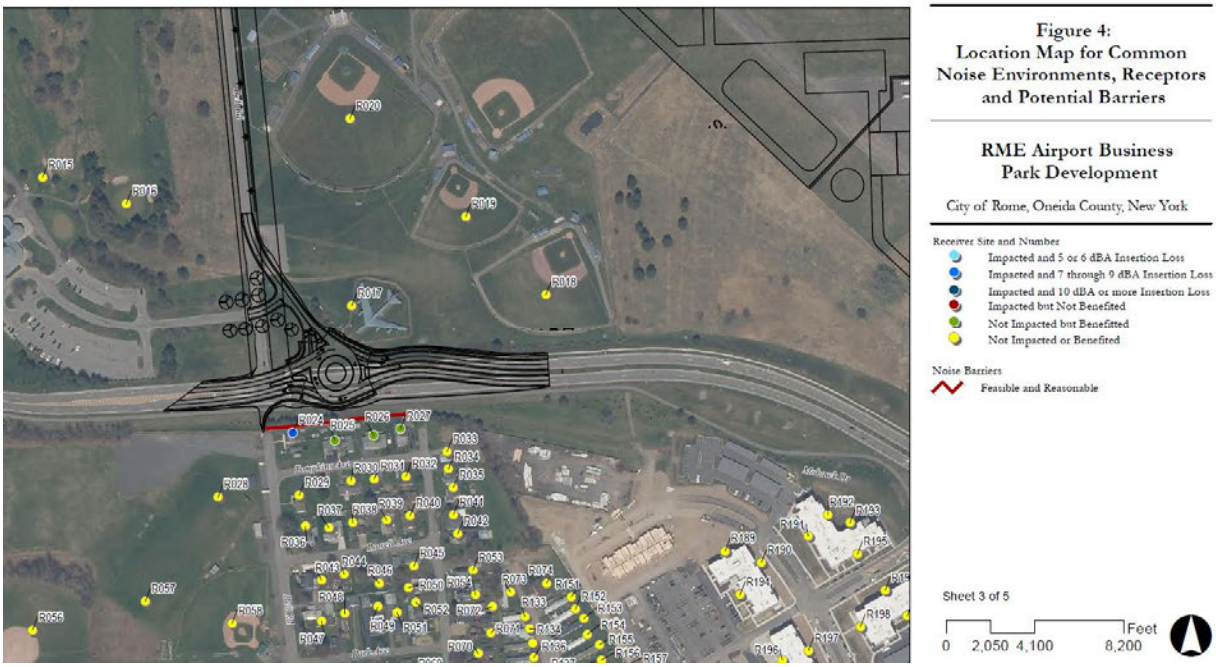
Table 8 (page I-35) in **Appendix I** summarizes the cumulative L_{eq} noise levels at each of these receptors due to construction activities and shows that 8 of the 13 receptors are predicted to exceed the suggested 80 dBA threshold at some point during construction. These noise levels are temporary in nature, and upon completion of the Proposed Project, noise levels would return to existing conditions.

4.12.3 Mitigation

When the Build scenario noise levels approach or exceed the FHWA noise abatement criteria during the loudest hour of the day or cause a substantial increase in existing noise, consideration of traffic noise reduction measures is warranted. If it is found that such mitigation measures would cause adverse social, economic, or environmental effects that outweigh the benefits received, they may be dismissed from consideration. If traffic noise abatement measures are warranted, the evaluation of noise abatement proceeds to the feasibility phase. If noise abatement measures are found to be feasible, all feasible noise barriers then proceed to the third phase, in which the reasonableness of the proposed abatement measures are evaluated. If traffic noise impacts are not predicted to occur, i.e. noise abatement is not warranted, then consideration of the feasibility and reasonableness of noise abatement is not required.

One noise barrier was evaluated for the Proposed Project to mitigate noise impact at one residence along Tompkins Avenue. **Figure 4.28** is a snapshot of Figure 4 in **Appendix I** and shows the location of the barrier as well as the benefit status and noise reduction category for each receptor by its color. The noise level at the most impacted property on Tompkins Avenue was reduced by 8 dBA $L_{eq}(h)$ and the properties adjacent to the barrier would also be positively impacted (tax parcels 243.018-1-59, 243.018-1-61, 243.018-1-64, and 243.018-1-65). The 450 foot long by 10-foot-high barrier that was evaluated was found to be both feasible and reasonable.

Figure 4.28 - Noise Barrier Location (Excerpt of Figure 4, Appendix I)



Source: Appendix I, Noise Technical Report, Figure 4, HMMH, February 2024

Construction activities would be carried out in compliance with all applicable local noise regulations. To minimize and reduce construction noise, mitigation strategies should be implemented where practicable. These strategies may include, but are not limited to:

- Providing appropriate manufacturer's noise reduction devices, including, but not limited to a manufacturer's muffler (or equivalently rated material) that is free of rust, holes, and exhaust leaks on construction equipment operating on site.
- Portable noise from construction devices with internal combustion engines shall be mitigated by ensuring that the engine's housing doors are kept closed on construction devices with internal combustion engines.
- Covering equipment, such as compressors, generators, pumps and other such devices with noise-insulating fabric as well as operating the device at lower engine speeds during work to the maximum extent possible.
- Operational controls such as limiting vehicle engine idling onsite and time-of-day restrictions for certain activities, such as a restriction on nighttime pile driving.
- Using quieter or ambient-sensitive back-up alarms on construction equipment whenever practical.
- Strategically positioning construction vehicles as to minimize operation near receptors and directing construction haul vehicles away from receptors when traveling to and from the work site.
- Use of noise pathway controls, including noise barriers and enclosures free from gaps and holes should be placed as close as possible to construction areas.
- Develop and submit a Noise Control Plan on a regular basis (e.g. every six months) that includes prediction of construction noise at sensitive locations based on the equipment and activities that will be used over the period of interest. If construction activities are expected to exceed applicable limits, the plan will identify the mitigation measures that will be incorporated into the activities and the amount of noise reduction achieved.
- Public information procedures to keep the public informed about construction activities and efforts to minimize noise in the community.

- Complaint response procedures for prompt response and corrective action to noise complaints during construction.
- Consideration should be given to construction of the noise barrier prior to construction activities related to the traffic roundabout and realignment of Perimeter Road to reduce construction noise to the four affected properties identified above (requested by one of the adjacent property owners at a meeting held on March 18, 2024)

4.12.4 Significance Threshold and Conclusions

The FAA's significance threshold for noise includes the action would increase noise by DNL 1.5 dB or more for a noise sensitive area that is exposed to noise at or above the DNL 65 dB noise exposure level, or that will be exposed at or above the DNL 65dB level due to a DNL 1.5dB or greater increase, when compared to the no action alternative for the same timeframe.

FHWA and NYSDOT have established the following noise abatement criteria for various land uses: exterior noise levels approach or exceed 67 dBA in terms of $L_{eq}(h)$ during the loudest hours of the day for residential and recreational areas; exterior noise levels approach or exceed 72 dBA, $L_{eq}(h)$ for commercial properties, and interior noise levels approach or exceed 52 dBA, $L_{eq}(h)$ for institutional properties. Specifically, NYSDOT defines the word "approach" as within 1 decibel and a substantial increase as an increase in 6 decibels or more above existing levels.

The Proposed Project would not affect airport activity levels or capacity, change the number or type of aircraft operating at the Airport, or change current runway threshold locations and therefore would not influence overall aircraft-generated noise. The Proposed Project would have no impact on the DNL 65 noise contour or introduce noise sensitive areas within the contour and would maintain noise-compatible land uses in proximity to the Airport. With the installation of a 10-foot high, 450-foot-long noise barrier adjacent to the four properties along Tomkins Avenue near the Proposed Project's roundabout, no significant impact to noise and noise compatible land uses due to aircraft or traffic activity are expected. Temporary increases in noise during construction would be short-term and take place in the immediate vicinity of the construction area.

4.13 Socioeconomics [redacted] and Children's Environmental Health and Safety

According to the FAA Order 1050.1F Desk Reference, the FAA must evaluate proposed actions and their effect on the socioeconomics of the surrounding community. Socioeconomic resources include population, income, employment, and economics. Socioeconomic resources also include sensitive populations such as minorities, low-income communities, and children, as mandated by EO 13045 Protection of Children from Environmental Health Risks and Safety Risks [redacted]. EO 13045 states that federal agencies shall identify and address environmental health and safety risks from their activities, policies, or programs that may disproportionately affect children. [redacted].

[redacted]

4.13.1 Affected Environment

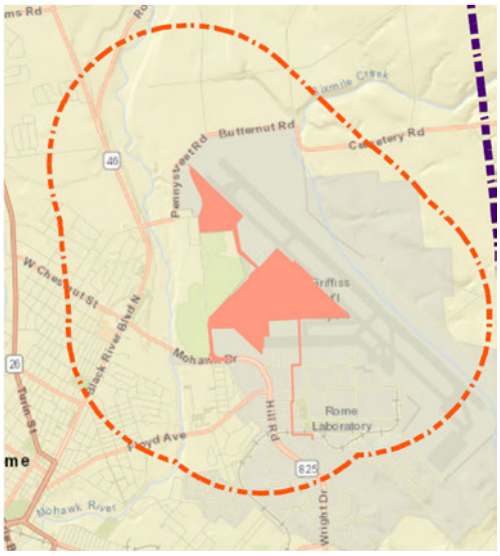
Project Study Area

Socioeconomic changes may occur when a project directly or indirectly changes environmental, economic, social, or health-related community conditions. [redacted]

Comparison communities used include the City of Rome, Oneida County, and New York State, since the Project is entirely located within these boundaries.

The Project Study Area analyzed includes the limits of the Project boundaries plus an additional 1-mile radius extending outward from the project site (**Figure 4.29**).

Figure 4.29 - Socioeconomic Project Study Area



Source: ESRI

Socioeconomics Conditions

Table 4.14 indicates a summary of selected socioeconomic characteristics for the Project Study Area, as well as the comparison geographies/reference communities of the City of Rome, Oneida County, and New York State. A detailed summary of socioeconomic characteristics is provided in **Appendix K.**

Table 4.14 - 2022 Summary of Selected Socioeconomic Characteristics

Demographic Metric	Project Study Area	City of Rome	Oneida County	New York State
Population, total	5,799	32,096	229,541	20,154,490
Children (Under 18 years of age)	19.82%	19.67%	19.26%	20.18%
Race Statistics:				
White	83.88%	81.42%	79.29%	54.60%
Non-White	16.12%	18.58%	20.71%	45.40%
Latino or Hispanic	6.62%	7.22%	6.62%	19.68%
Black or African American	4.60%	6.94%	7.00%	14.74%
Asian	2.50%	1.41%	4.70%	9.75%
Minority	13.54%	17.80%	19.59%	46.70%
Housing Statistics:				
Housing Units	3,066	14,941	105,256	8,555,567
Vacant Housing Units	9.13%	9.69%	11.48%	9.80%
Economic and Employment Statistics:				
Median household income	$54,928	$53,840	$61,597	$79,321
Per Capita Income	$38,704	$32,515	$35,575	$45,962
Percentage of households whose income is below the poverty level[1]	13.33%	15.70%	13.23%	13.54%
Percentage of individuals whose income is below the poverty level[1]	15.49%	16.71%	14.24%	13.58%
Labor force	2,789	14,331	108,894	9,790,235
Employment Rate	98.6%	97.9%	97.5%	94.9%
Unemployment Rate (of civilian labor force)	1.4%	2.1%	2.5%	5.1%

[1] For an individual person in 2022, an income at or below $13,590 is the threshold for a low-income person as defined by the US Department of Health and Human Services. For a family of four, the threshold is $27,750.
Source: ESRI Demographics (Business Analyst); C&S Engineers, Inc. 2022.

Economic Activity: The State of the Region: Mohawk Valley 2023 Strategic Plan[63] discusses current economic activity taking place in the Mohawk Valley Region. Key focus areas include Stem and Advanced Manufacturing, cybersecurity, Unmanned Aircraft Systems (UAS), Agribusiness and Food Systems, and Tourism. Excerpts from the Plan are discussed below.

Stem and Advanced Manufacturing: The Region has emerged as a global leader in advanced electronics, semiconductors, quantum computing, artificial intelligence/machine learning, and unmanned aerial systems. Advanced electronics is a key component of this growth and innovation.

GlobalFoundries has a presence in the area, contributing to the semiconductor industry's growth. Wolfspeed, Inc., in Marcy is a top American developer and manufacturer of wide-bandgap semiconductors, focused on

[63] MVREDC_Strategic_Plan_2023.pdf (ny.gov)

silicon carbide and gallium nitride materials and devices for power and radio frequency applications such as transportation, power supplies, power inverters, and wireless systems. These new jobs are estimated to have added over $42 million in annual wages to the local economy employing 5,800 people with a median wage of $64,134.

Cybersecurity: Companies in the Mohawk Valley focused on providing cybersecurity solutions and services to protect critical infrastructure and sensitive data include Assured Information Security, Inc., and Air Structures American Technologies Inc.

Unmanned Aircraft Systems: The Mohawk Valley is also a hub for unmanned aerial systems (UAS) testing and development. A key facility in the region is the New York UAS Test Site at Griffiss International Airport in Rome. This site is part of the Federal Aviation Administration's (FAA) UAS Integration Pilot Program and has been instrumental in advancing UAS technology and applications.

Agribusiness and Food Systems: Farming and its support services are big business in the Mohawk Valley with the annual market value of all agricultural products sold by farmers topping $350 million. There are nearly 3,760 individual farms and more than 702,000 acres of farmland. Currently, clusters within the Food Ecosystem such as Food Manufacturing have 2,346 jobs and average annual wage of $56,165.

Tourism: The Mohawk Valley boasts a thriving Tourism industry, blending natural beauty, historical sites, recreation, and cuisine. Regional tourism has seen a huge resurgence in the last two years, with counties in the Mohawk Valley yielding the highest visitor spending in Upstate New York, at approximately $4.3 billion for 2022. Lodging, Food and Beverage, and Retail subsectors comprise nearly 80% of annual visitor spending. Industry establishments employ nearly 30,000 residents, including top employer, the Oneida Indian Nation, with over 4,500 employees.

Income: According to the 2022 ESRI Demographics, key business sectors in the City of Rome include public administration, health care/social assistance, retail, educational services, and manufacturing (Appendix K). The median household income in the County is $61,597 $53,840 in the City of Rome, and $54,928within the Project Study Area. The Project Study Area income is higher than the City of Rome but lower than County and State median household income.

Employment: As shown in **Table 4.14**, as of 2022, approximately 98.6% of the civilian labor force in the Project Study Area is employed. This is slightly higher than that of the City of Rome, Oneida County, and New York State. In total, there were 4,773 establishments in Oneida County employing residents from both within the County and its nearby communities.[64]

Population and Housing*:* According to the 2022 ESRI Demographics[65], the U.S. Census Bureau estimates that the population of the census tract containing the Project areas was 4,481. According to the Census, the areas is predominately white (83.8 percent), with some Hispanic (6.6 percent), and Black or African American (4.6 percent), and Asian (2.5 percent). The racial and ethnic makeup in the Project Study Area is less diverse than areas in the City of Rome, Oneida County, and New York State. The percent of population below the poverty level in the Project Study Area is also lower than City of Rome and New York State. Additionally, vacant housing units in the Project Study Area like the City of Rome and New York State but lower than the County.

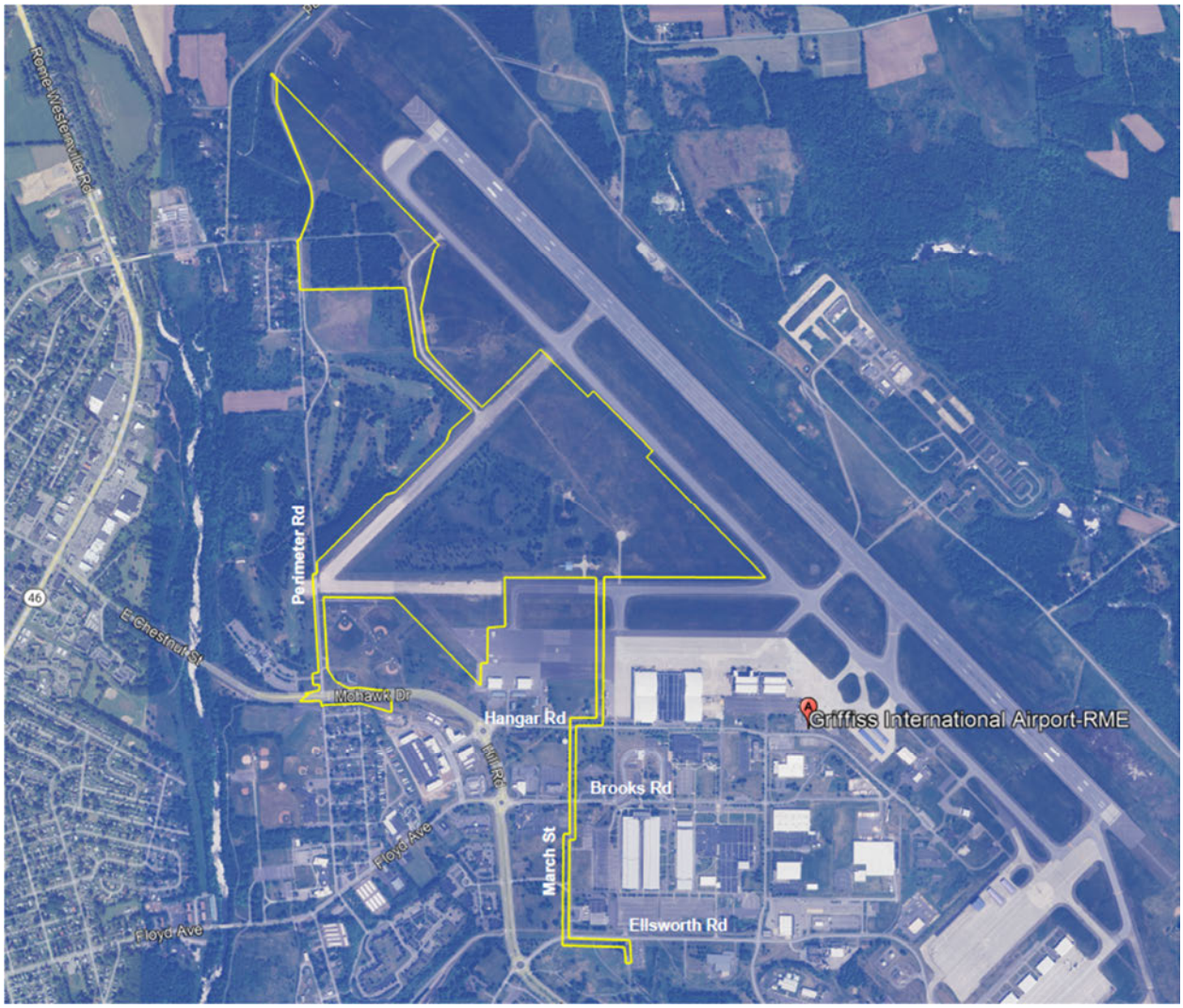
[64] US Census Bureau. Table CBP2000CBP from the 2020: ECNSVY Business Patterns County Business Patterns Economic Survey Table. Accessible at: https://data.census.gov/cedsci/table?q=employee&g=0400000US36_0500000US36065_0600000US3606563418&tid=CBP2020.CB2000CBP (Accessed 11/4/22).

[65] Global Demographic Data from 130+ Countries | Esri Demographics, includes data from ESRI, US Census Bureau, & American Community Survey (ACS)

Public Services: A summary of existing public services available to the Project area is provided in **Table 4.15** based on communications with providers. For a detailed description of public services, infrastructure and providers see **Appendix L**

Traffic: Access to the airport is mainly provided by New York State (NYS) Route 825 (Mohawk Drive) via NYS Routes 49 and 46. NYS Route 825 connects to NYS Route 49 at its southern end and NYS Route 46 at its northern end. The airport is just east of NYS Route 825. Floyd Avenue provides another connection to the airport from downtown Rome between NYS Route 46 and NYS Route 825. From NYS Route 825, the Project area can be reached via Perimeter Road or NYS Route 46 via E. Chestnut Street (**Figure 4.30**).

Figure 4.30 - Project Area Major Roadways



Source: C&S Engineers, Inc

Table 4.15 - Existing Public Services

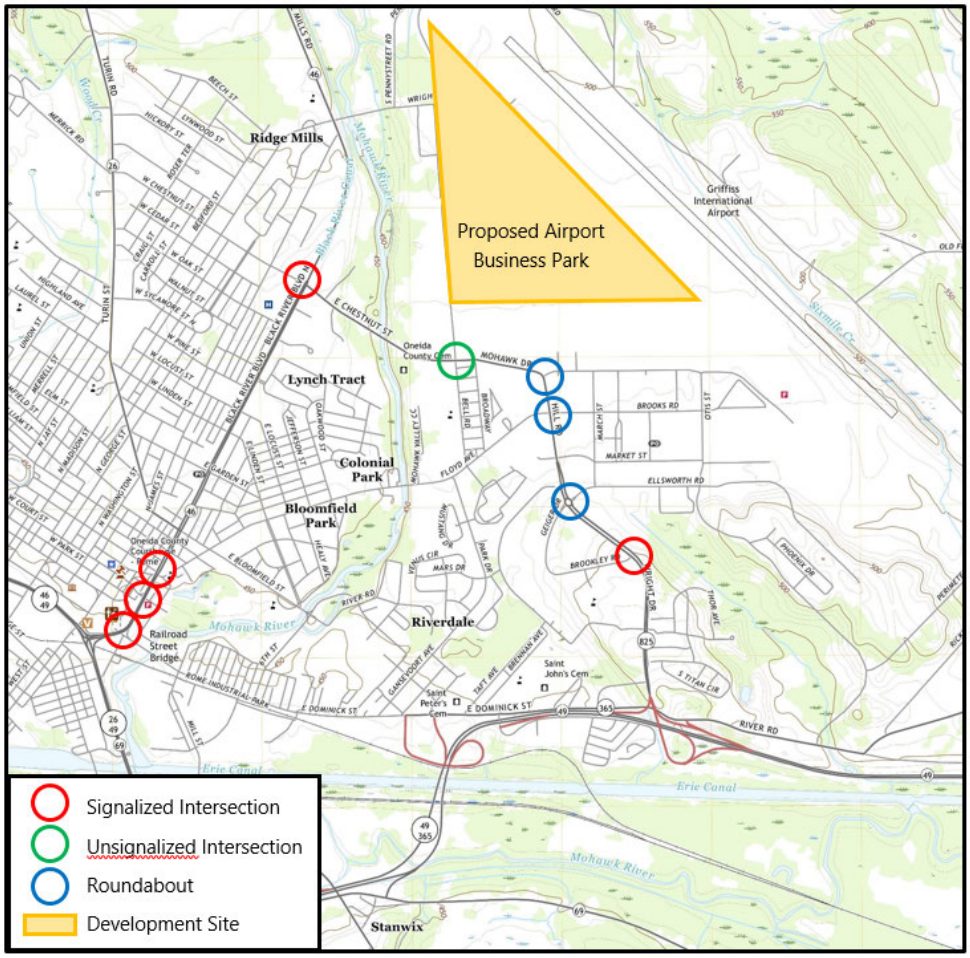
Service Type	Service Provider	Topics & Issues Discussed
Public Services		
Sewer and Water	City of Rome Department of Public Works (DPW)	♦ Comprised of several divisions that work to maintain the water, sewer, transportation, and mechanical infrastructure of the City of Rome. ♦ Will provide water, sanitary sewer, and road maintenance services to the Proposed Project. ♦ Existing water and sewer infrastructure in place on and surrounding the Proposed Project site is shown in Appendix L, Attachment A.
Electric	Griffiss Utility Services Corporation (GUSC)	♦ Operates a co-generation facility that distributes electricity to tenants of the existing Griffiss Business and Technology Park. GUSC will provide electric service to the Proposed Project. ♦ Existing electric infrastructure in place on and surrounding the Proposed Project site is shown in Appendix L, Attachment A.
Gas	National Grid	♦ Regional-scale electric and natural gas utility. National Grid will provide natural gas service to the Proposed Project, but not electricity. ♦ Existing natural gas infrastructure in place on and surrounding the Proposed Project site is shown in Appendix L, Attachment A.
Telecommunications	Northland Communications	♦ Regional telecommunications provider that will provide service to the Proposed Project. ♦ See Appendix L, Section 1.2.1 for location of existing Northland Communications infrastructure in place in and surrounding the Proposed Project site.
Police	City of Rome Police Department	♦ Employs approximately 74 police officers with a variety of specialized units and vehicle fleets to serve the City of Rome, including Griffiss International Airport and the Proposed Project site. ♦ The City of Rome Police Station is located approximately seven drive-time minutes from the Proposed Project.
Fire	City of Rome Fire Department	♦ Employs a workforce of approximately 85 personnel working from two stations to fill a variety of emergency response and public safety roles. ♦ Serves the City of Rome, including the Griffiss International Airport and the Proposed Project site. ♦ Will provide service to vertical structures and other non-airfield features of the Proposed Project. ♦ The City of Rome Fire Station is located approximately 2.5 miles driving distance from the Proposed Project site.
ARFF	Griffiss International Airport Air Rescue and Fire Fighting (ARFF)	♦ Located on-airport, the ARFF provides emergency response service to incidents involving aircraft and/or located on airfield infrastructure. ♦ Will provide service to Proposed Project features and events involving aircraft and/or located on airfield infrastructure supporting aircraft movement.
Medical Services		
Ambulance	AmCare Ambulance	♦ Emergency medical service (EMS) provider with a 360 square-mile service area including the City of Rome and the Proposed Project site, where AmCare will provide Mutual Aid 911 services.
Educational		
Schools	Rome City School District (RCSD)	♦ Provides public education to students living in the City of Rome. ♦ Currently operates nine schools with coverage from Pre-Kindergarten through 12th Grade and total enrollment of 5,342 students. ♦ George R. Staley Elementary School was closed in Fall 2021 following a flooding incident, temporarily reducing capacity as a replacement facility is designed and constructed. ♦ Construction of a new elementary school is expected.

Source: C&S Engineers, Inc.

In addition to major roadways, intersecting streets that serve the Project area include the following (**Figure 4.31**):

- Signalized
  - NYS Route 825 at Brookley Road
  - NYS Route 825 at NYS Route 46
  - NYS Route 26/46 at Floyd Avenue
  - NYS Route 26/46 at E. Court Street/Brook Street
  - NYS Route 26/46 at E. Dominick Street
- Unsignalized
  - NYS Route 825 at Perimeter Road
  - Roundabout
  - NYS Route 825 at Geiger Drive/Ellsworth Road
  - NYS Route 825 at Brooks Road
  - NYS Route 825 at Hangar Road

Figure 4.31 - Project Area Intersecting Streets



Source: C&S Engineers, Inc

A Traffic Analysis was completed for the Project area with traffic volumes collected for the typical AM and PM peak hours (**Appendix J**). The intersections were then analyzed to determine if delays to Level of Service (LOS) currently exist. The analysis indicated the following:

- Existing level of service for NYS Route 46 at NYS Route 825 noted heavy traffic for westbound traffic
- Existing level shows heavy traffic at the intersection of Routes 46 and 825 for westbound traffic and a failing level of service for certain movements at the intersection of Route 46 and East Chestnut Street. These movements are left turns for the northeast approach on Route 46 and through movements for the northwest approach on Route 825.

[redacted]

[redacted]

[redacted]

Children's Environmental Health and Safety Risks

EO 13045, Protection of Children from Environmental Health Risks and Safety Risks, defines the risks to children's safety that are attributable to products or substances that the child is likely to touch or ingest including the air we breathe, the food we eat, the water we drink or use for recreation, and the soil we use to grow food.

As shown previously in **Table 4.14**, children's population statistics within the Project Study Area are generally consistent with the City of Rome, Oneida County, and New York State (within <0.1% difference). There are no schools, daycare centers, children's health clinics, or any other concentrated populations of children residing in the Project area. As shown in **Appendix K**, page K-18, child facilities are in the project vicinity and summarized below:

- Ridge Mills Elementary School: 0.5 miles away
- Jerry C Clough School (Preschool): 0.5 miles away
- Update Cerebral Palsy New Discoveries Learning Center: 0.9 miles away
- Franklyn Field (Summer Feeding Center): 1 mile away
- Griffiss Child Development Center (Preschool): 1.2 miles away

4.13.2 Environmental Consequences

No-Action Alternative

No development will occur with the No-Action Alternative. As a result, no socioeconomic or social impacts are expected.

Proposed Project

Economic Activity

Industries expected to locate at the Proposed Project include manufacturing, emerging technologies such as Unmanned Aerial Systems (UAS)/Advanced Air Mobility (AAM) and other aeronautical industry, and research & development. Each of these industries would build upon regional strengths, aligning with regional priorities for economic development. For example, the Griffiss Business & Technology Park currently contains private and public enterprises with specific focuses in technology, manufacturing, aviation, office, education, and recreation. The Proposed Project would expand this type of industry for mixed use of the site (aeronautical use and non-aeronautical use). The Proposed Project includes more than 1.9 million square feet of facility square footage for these and other uses. The economic activity generated by operations at the Project Site would be a major benefit to the community and region.

Income

The Proposed Project will create high-quality jobs. The overall average wage in the Mohawk Valley Region is $50,778 (Table 1.7). According to Table 1.8, the average Mohawk Valley Region wage for Advanced Manufacturing is $51,354 (1% higher than overall) and the average UAV/aviation wage is $60,940 (20% higher than overall). The Proposed Project will positively impact employment conditions, wages and income, and economic activity in the community and region.

Employment

Table 4.16 summarizes the type of use, facility square footage, and projected on-site employment for the Proposed Project.

Table 4.16 - Proposed Use and On-Site Employment

Use Type	Square Footage	Projected On-Site Employment
R&D/Tech Manufacturing	1,451,000	2,560
Hangar Uses - Mixed	362,000	278
R&D Campus	100,000	143
Total	1,913,000	2,981

Source: C&S Engineers, Inc. 2023. Employment projections based on Energy Information Administration data and market observations with assumed 2,000-employee operation on site.

Operations expected as part of the Proposed Project include manufacturing, emerging technologies such as Unmanned Aerial Systems (UAS)/Advanced Air Mobility (AAM) and other aeronautical industry, and research & development. Some 2,981 jobs would be located onsite at full buildout. There would be no relocation of existing jobs from the Project site, and additional employment growth in the community and region may occur as a benefit of the Proposed Project. Employment impacts of the Project will be positive.

Population and Housing

Population: Population is likely to increase regionally as the Proposed Project introduces new capacity for economic development with associated employment opportunities. As detailed in **Table 4.15**, an estimated 2,981 employees could work at facilities located on the Project Site at full buildout. These employees are expected to live primarily within commuting distance from the Project, anecdotally identified as a 45-minute drive-time radius. A portion of the Project site employees would already reside in the region and would not contribute to population growth, although vacated jobs could potentially be filled through in-migration to the region. Other Project site employees would move into the region from elsewhere.

The level of population growth resulting from the Proposed Project depends on the number of employees, percentage of jobs filled by residents versus new employees moving into the region, rate of vacated job replacement from within the region versus migration into the region, family size, and potentially other factors. At full buildout, if each of the estimated 2,981 employees were to live in an average-sized household[68], approximately 6,945 total residents would live in employee households. Some portion of these residents would already reside in the region, and others would be new to the region. For context, the 6,945 residents living in employee households would represent approximately 2.4% of the current Utica-Rome MSA total population (288,668).

Housing: As noted above, employees working at the Proposed Project are generally expected to live in communities throughout an approximate 45-minute drive-time radius of the Project site. The location of residence depends on several variables such as housing cost and availability, commute times, family status, and personal preferences reflecting several practical and lifestyle-related factors. Employees already living in the region may continue to live in their current location, and employees moving into the region would select places of residence based on market factors and personal preference.

As shown in **Table 4.14**, there are 3,066 housing units in the Project Study Area, 14,941 in the City of Rome, and 105,256 in Oneida Based on the vacancy rates for these geographies, there would be 280 vacant housing

[68] ESRI Demographics, Utica-Rome Metropolitan Statistical Area average household size 2.33 (2022).

units in the Project Study Area, 1,448 vacant units in the City of Rome, and 12,083 vacant units in Oneida County.

Currently vacant housing units in Oneida County alone offer more than sufficient capacity to house employees working at the Project Site. Additional options will be available to these employees, including housing within the general region but not in Oneida County, or new construction starts. Undeveloped land, and land with redevelopment potential, are abundant in the region, offering locations for new residential construction to meet housing demand if necessary.

Real Property Taxation: The Project Site will remain under Oneida County ownership, with individual sites ground-leased to occupants for development at fair market value according to FAA requirements and grant obligations. Under this arrangement, private development will occur on County-owned land that is currently tax-exempt.

The Mohawk Valley EDGE economic development corporation will establish a payment structure applicable to private development on the Project site. The organization anticipates that a master Payment In Lieu Of Taxes (PILOT) agreement will be established for the Project Site prior to development. Terms of the PILOT agreement – addressing the rate structure and distribution of tax revenues – will be negotiated with applicable tax jurisdictions including the Rome City School District, City of Rome, and Oneida County. In addition to revenue generation for the applicable tax jurisdictions, the negotiated agreement will allow for the recovery of funds used to design and install utilities and infrastructure serving the site prior to its development.

Upon approval by all tax jurisdictions, the master PILOT agreement will apply to the entire Project Site. Real property constructed on the site will be required to make payments in lieu of taxation according to the terms of this master agreement.

Public Services

The Proposed Project will employ approximately 2,981 employees at full build out. This will result in an increase in population to the surrounding area which may affect demand on public services such as fire, police, ambulances, health care facilities, and schools. Additionally, operation of the facilities (1.9 million SF) will increase the demand for utilities (water, sewer, electric, gas) and telecommunications. To determine whether the public services could accommodate the Proposed Project, consultation/coordination took place with service providers (**Table 4.17**). Based on consultation services are adequate and no improvements are needed for the following public services:

- City of Rome Fire Department
- City of Rome Police Department
- AmCare Ambulance
- Rome Health

Improvements will be required for the following public services:

- City of Rome Department of Public Works (Water, Sanitary Sewer)
- Griffiss Utility Services Corporation (Electric)
- National Grid (Natural Gas)
- Northland Communications (Telecommunications)
- Rome City School District

For public services that require improvements, further coordination took place during the planning and design process with all substantive comments addressed during preliminary design. Preliminary design

Table 4.17 - Summary of Written Public Services Correspondence

Public Service	Contact Date	Response Date	Summary of Response(s)
Public Utilities			
City of Rome Department of Public Works	10/12/2022 12/19/2022 8/11/2023	1/3/2023 (2 emails) 1/5/2023 8/23/2023	♦ Provided minor comments and feedback on infrastructure capacity and design. This feedback was incorporated into the design and will be further refined as the Project advances to final design. See response letter included in Attachment C. ♦ As of 8/23/2023 letter, indicated that there are no concerns with the updated information about the Project.
Griffiss Utility Services Corporation (GUSC)	12/15/2022	1/27/2023	♦ Several electric infrastructure upgrades are necessary to the Ellsworth Substation and distribution feeder system to provide the 50 MW of electricity to the Project. GUSC is willing to finance the cost of system upgrades, up to a maximum of four million dollars (approximately one-third for the current total cost of work). GUSC has provided a new rate structure specifically to attract one or more prospective non-residential customers that have a large peak electric demand.
National Grid	1/4/2023 8/11/2023	1/4/2023	♦ No comments noted in response.
Northland Communications	12/15/2022 8/11/2023	1/11/2023 8/16/2023	♦ Able to provide fiber connections for the Project. Provided comment regarding design and need to bore under the runway.
Public Safety			
City of Rome Fire Department	10/18/2022 12/15/2022 8/28/2023	10/21/2022	♦ The Fire Department requested additional information providing a basis to evaluate access points, water supply and hydrant locations, road widths, and turn radius. ♦ Following the provision of 30% design drawings, no further response was received from the City of Rome Fire Department.
City of Rome Police Department	10/18/2022 8/11/2023	10/18/2022	♦ The Police Department did not identify any areas of concern following a review of the Proposed Project. Regarding areas inside the RME fence line, Rome PD are typically first responders for any emergencies and retains primary jurisdiction for all criminal investigations of incidents.
Griffiss International Airport (RME) Air Rescue and Fire Fighting (ARFF)	2/10/2023 9/25/2023	2/18/2023	♦ Griffiss currently has two ARFF vehicles (#007-2007 Osh Kosh Striker 3000 and #88-1003 Osh Kosh TB 1500) with the capability of supporting up to a FAA Part 139 Index C. In the event of significant increase in air traffic or standby requirements for engines runs and defueling/refueling, another truck would be recommended due to the age of ARFF truck #88. Additionally, if the Project results in impacts to the size of aircraft that are utilizing the airport, an upgrade to FAA Part 139 Index D may be required, for which the Airport cannot meet these requirements.
Medical Services			
AmCare Ambulance	10/12/2022 8/11/2023	10/13/2022	♦ AmCare Ambulance Service has the ability and capacity to provide emergency medical services to the Proposed Project.
Rome Health	10/12/2022 8/11/2023	11/8/2022	♦ Rome Health can provide medical and emergency services to the community, including the Proposed Project and its employees, during development and thereafter.
Educational Institutions			
Rome City School District	10/12/2022 11/2/2022 8/11/2023	10/13/2022 11/11/2022 Memos dated 11/9/2022 2/13/2023	♦ More information on project timeframes and scale of growth requested in initial RCSD response dated 10/13/2022. Project Team follow-up memorandum provided on 11/2/2022. RCSD response with memorandum dated 11/11/2022 provides enrollment forecast and expresses reservations about capacity to serve growth in the near term. RCSD response dated 2/13/2023 indicates that the District anticipates being able to accommodate the increased student demand created by the Project.

Source: C&S Engineers, Inc. 2022

identified specific improvements needed to accommodate the increased electric, water, sewer, and natural gas needs of the Proposed Project development (**Table 4.18** and **Appendix L**, pages L-15 to L-47).

With the recommended improvements, there will be adequate capacity to accommodate the Proposed Project needs and no significant impacts to public services are expected.

Traffic

The Proposed Project will result in increased traffic to the site from employees and trucks associated with the large manufacturing facility (1,000,000 SF). The Traffic Assessment identified new trips for the AM peak period would increase by 629 and the PM peak trips would increase by 648 (**Table 4.19**). The Traffic Assessment identified a 1.1% increase in vehicle traffic over existing conditions and a 4.91% increase in truck traffic. Once site development reaches 30% (primarily associated with the manufacturing facility being constructed in the next five years and shift work which would require many trips in a short period of time), improvements at the intersection of Perimeter Road and Route 825 (Mohawk Drive) would be needed.

Table 4.19 - Trips Associated with Proposed Project

AM Trips 8am-9am		PM Trips 4:30pm-5:30pm	
Enter	Exit	Enter	Exit
470	159	224	444
629		648	

Appendix J – Traffic Assessment, C&S Engineers, Inc.

The Traffic Assessment noted improvements could include a traffic signal and right turn lane at the intersection of Route 825 and Perimeter Road or construction of a traffic roundabout. Based on review of the Traffic Assessment, communications, and a meeting held on March 2, 2023, NYSDOT stated a traffic roundabout is preferred from a safety, efficiency, operational, and environmental perspective (**Appendix D**, pages D-222 to D-244, and **Appendix Q**, pages Q-167 to Q-183). Realignment of Perimeter Road will be required as part of the traffic roundabout improvements (**Figure 4.1**). Although traffic patterns will be altered with the construction of the roadway improvements significant impacts are not expected. In fact, the Federal Highway Administration (FHWA) notes traffic roundabouts substantially reduce crashes that result in serious injury, improve safety, promote lower speeds, reduce conflict points, and lead to improved operational performance.[69]

Temporary construction impacts associated with the road improvements (traffic roundabout, realignment of Perimeter Road) include clearing, grading, grubbing, installing stormwater management areas, removal of existing pavement associated with roadways, curbs, and pedestrian paths; placing new roadway subbase, construction of new paved roads, curbs, and pedestrian paths/crosswalks; landscaping, signs, lighting, , relocation of any utilities in the area of disturbance, trenching for underground conduit, installation of new sewer and water lines along Perimeter Road, and traffic pattern changes.

[69] Roundabouts | FHWA (dot.gov)

Table 4.18 – Proposed Project Utility Improvements

Service Type	Service Provider	Topics & Issues Discussed
Public Services		
ARFF	Griffiss International Airport Air Rescue and Fire Fighting (ARFF)	♦ The RME ARFF indicated the potential need to acquire an additional ARFF vehicle in the event of a change to aircraft operations or types of aircraft operating at the Airport because of the Proposed Project. The Proposed Project is not anticipated to change the Airport's ARFF classification since the Project is not impacting the airfield's configuration in a way that would attract operations by larger aircraft.
Water	City of Rome Department of Public Works (DPW)	♦ A 12" diameter water main loop is proposed to service the Proposed Project. ♦ The proposed 12" diameter water main will tie into the existing 8" diameter water main that extends north to the Proposed Project. ♦ Fire Hydrants will be spaced every 500 ft along the 12" diameter water main loop. ♦ Individual branch/service lines and hydrants will be provided for each proposed building at the time of development for each site/building per City of Rome Fire Department and Department of Public Works requirements. ♦ Based on coordination with the City of Rome Department of Public Works, our preliminary analysis of the existing site utilities, and estimated demand for the Proposed Project, water service will be provided with no negative impact to the system.
Wastewater	City of Rome Department of Public Works (DPW)	♦ An 8" diameter sanitary sewer main is proposed to service the Proposed Project. ♦ The proposed 8" diameter sanitary sewer main will tie into the existing sanitary sewer manhole in the intersection of Mohawk Drive and Perimeter Road. ♦ The proposed 8" diameter sanitary sewer main will be routed north to the Proposed Project within a proposed 50ft wide utility corridor on the west side of Perimeter Road. ♦ Sanitary sewer manholes will be spaced every 400 ft along the 8" diameter sanitary sewer main. ♦ Individual branch/service lines will be provided for each proposed building at the time of development for each site/building per State, County, and local standards/codes. ♦ Based on coordination with the City of Rome Department of Public Works, our preliminary analysis of the existing site utilities, and estimated demand for the Proposed Project, wastewater service will be provided with no negative impact to the system.
Electric	Griffiss Utility Services Corporation (GUSC)	♦ A 15 way 5" conduit electrical duct bank is proposed to service the Proposed Project. ♦ The proposed electrical duct bank will be routed north from the Existing Ellsworth Substation to the Proposed Project along March Street within a 50ft wide proposed utility corridor. ♦ A new 15 kV switchgear will be required at the Proposed Project. ♦ Individual branch/service lines will be provided for each proposed building at the time of development for each site/building per State, County, and local standards/codes. ♦ The existing Ellsworth Substation will need to be upgraded (new station transformer) in order to provide the required power for the Proposed Project. ♦ An estimated 35-50 MW of power will be required for the Proposed Project. Based on coordination with GUSC (see correspondence in Attachment C), this amount of power will be provided by making upgrades to the existing electric distribution system (Ellsworth Substation) as proposed, and by purchasing additional power from National Grid as necessary.
Gas	National Grid	♦ An 8" diameter natural gas main is proposed to service the Proposed Project. ♦ The proposed 8" diameter natural gas main will tie into the existing 4" natural gas main at the intersection of Hangar Road and March Street. ♦ The proposed 8" diameter natural gas main will be routed north to the Proposed Protect within the proposed 50ft wide utility corridor. ♦ Individual branch/service lines will be provided for each proposed building at the time of development for each site/building per State, County, and local standards/codes. ♦ Based on coordination in meeting with National Grid, our preliminary analysis of the existing site utilities, and the estimated demand that the proposed development will have on the existing natural gas system, there will not be any impact to the system.
Telecommunications	Northland Communications	♦ Note 24 on Sheet GI003 of the Utility Plan (Attachment A) addresses telecommunications installation to serve the Proposed Project. Communications and fiber optic utilities will be provided for each building at the time of development per State, County, and local standards/codes. These utilities will be routed to the Proposed Project within the proposed 50ft wide utility corridor(s) and by utilizing existing infrastructure.
Student enrollment	Rome City School District	♦ Employs approximately 74 police officers with a variety of specialized units and vehicle fleets to serve the City of Rome, including Griffiss International Airport and the Proposed Project site. ♦ The City of Rome Police Station is located approximately seven drive-time minutes from the Proposed Project.

Source: C&S Engineers, Inc.

Land Acquisition

The Proposed Project involves land acquisition or property transfers as summarized in **Table 4.20** and shown on **Figure 4.2:**

- Fee simple for traffic roundabout, 0.05 acres (tax parcel 224.000-1-1)
- Utility corridor easements, 4.39 acres (tax parcels 243.000-1-1.6, 243.000-1-1.11, 243.000-1-1.33, 243.000-1-1.29 and 243.000-1-1.35)
- Temporary construction easements for road improvements and traffic roundabout, 0.25 acres (tax parcel 224.000-1-1)
- Property transfer to NYS for traffic roundabout, 0.89 acres (tax parcel 224.000-1-4.1)
- Property transfer to City of Rome for utility corridor (sewer), 0.75 acres (tax parcel 224.000-1-4.1)

The County's intent is to obtain all property needed for the Proposed Project and then transfer ownership to the applicable agencies that will maintain roads Griffiss Land Development Corporation (GLDC) and utilities (City of Rome, GUSC). Fee simple acquisition and a temporary construction easement are required on one private property for construction of the traffic roundabout. Utility corridor easements are required on five properties owned by the Oneida County Industrial Development Agency (OCIDA). Land acquisition will be conducted in accordance with state and local requirements (Oneida County, City of Rome, GLDC, OCIDA). The proposed acquisition takes place outside of airport property so compliance with federal land acquisition requirements is not applicable. Appraisals to determine fair market value of the easements will be conducted as needed. Regarding the property transfer, County owned property (one parcel) will be required to construct the traffic roundabout, realignment of Perimeter Road, and the proposed sewer/water utility corridor along Perimeter Road.

Agencies have participated in the planning and design processes that have taken place in development of the Proposed Project, meetings have been held with affected property owners (**Appendix Q**, Q-2 to Q-87), and communications took place as part of the public services coordination (**Appendix L**). All affected property owners indicated they are willing to provide the County with the required property and easements. As a result, no significant and/or adverse impacts related to land acquisition is expected.

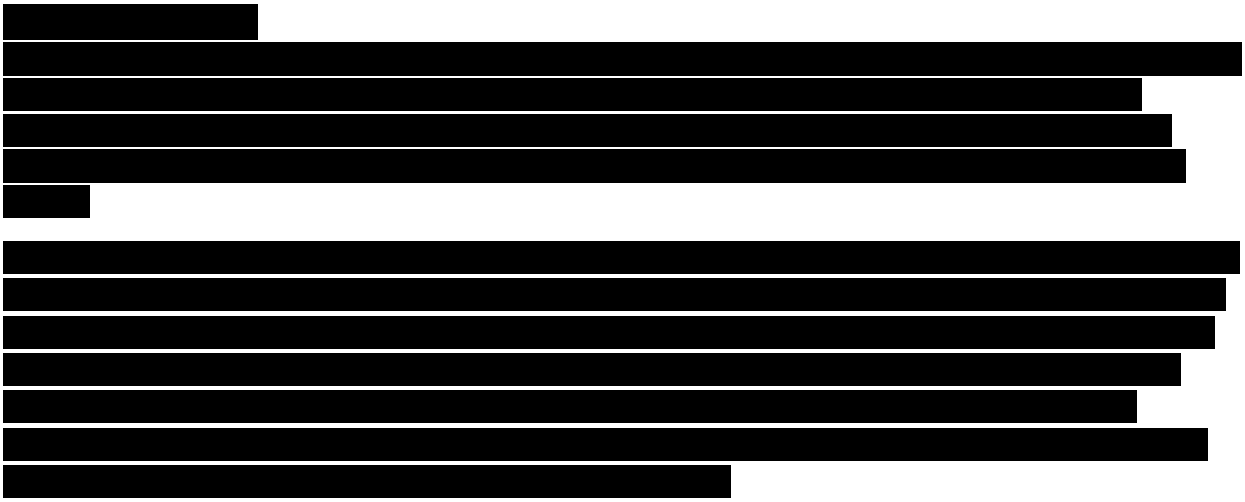


Table 4.20 Land Acquisition Summary

Land Acquisition (Acres)							Affected Parcel #	Owner	Need	Impacts
Fee Simple	Permanent Easement	Utility Corridor Easement	Temporary Construction Easement	Transfer of Property	No Acquisition	Permanent Conservation Easement				
						42.04	303.000-2-2	Donna Thrasher	Upland Sandpiper Mitigation	None
						112.85	290.000-2-46	Oneida County	Upland Sandpiper Mitigation	None
						13.39	290.000-2-51	Oneida County	Upland Sandpiper Mitigation	None
						15.62	303.000-1-10.1	Oneida County	Upland Sandpiper Mitigation	None
						9.06	303.000-2-1.1	Oneida County	Upland Sandpiper Mitigation	None
					X		224.018-1-61	Patricia Keating Plantz	Adjacent to Noise Barrier	Visual
					X		224.018-1-59	Carrie Day	Adjacent to Noise Barrier	Increase in noise, visual
					X		224.018-1-65	Wayne Hines	Adjacent to Noise Barrier	Visual
					X		224.018-1-64	Diego Felix	Adjacent to Noise Barrier	Visual
					X		224.000-1-4.1	Rome Baseball Assocation	Utility Corridor	Relocation of concession stand, storage facility, bullpen facilities depending on location of utilities
0.05							224.000-1-1	Mohawk Glen Associates LLC	Traffic Roundabout	Construction of traffic roundabout and associated grading and embankments
			0.25				224.000-1-1	Mohawk Glen Associates LLC	Realignment of Perimeter Road	Temporary construction impacts with realignment of Perimeter Road and location/layout of access road to Medical Center driveway
					X		224.000-1-14.1	GLDC	Utility Corridor	Directional boring under roads to connect new utilities to associated duct banks along roads or "open cut" methods on non-mainline pavements and shoulders to construct the underground duct banks, directional boring under Mohawk Drive to connect and extend the underground sewer/water lines along Perimeter Road
		1.1					243.000-1-1.11	OCIDA	Utility Corridor	Acquisition of 50-foot-wide utility corridor easements, construction of approximately 3,799 linear feet of underground duct bank adjacent to Ellsworth Road, March Street and Hangar Road
		0.65					243.000-1-1.33	OCIDA	Utility Corridor	Acquisition of 50-foot-wide utility corridor easements, construction of approximately 3,799 linear feet of underground duct bank adjacent to Ellsworth Road, March Street and Hangar Road

Land Acquisition (Acres)							Affected Parcel #	Owner	Need	Impacts
		0.98					243.000-1-1.6	OCIDA	Utility Corridor	Acquisition of 50-foot wide utility corridor easements, construction of approximately 3,799 linear feet of underground duct bank adjacent to Ellsworth Road, March Street and Hangar Road
		1.3					243.000-1-1.6	OCIDA	Utility Corridor / Griffiss Sculpture Park - Section 4f	Acquisition of 1.3-acre utility corridor easement, construction of 1,175 linear feet of underground duct bank/utilities adjacent to Ellsworth Road (1.3 acres), removal of approximately 1,175 linear feet of paved nature trail to install duct bank/utilities (0.22 acres), removal of automobile parking area pavement to install duct bank/utilities (0.11 acres)
		0.25					243.000-1-1.35	OCIDA / Cardinal Griffiss Realty LLC	Utility Corridor	Acquisition of 50-foot wide utility corridor easements, construction of approximately 3,799 linear feet of underground duct bank adjacent to Ellsworth Road, March Street and Hangar Road
		0.11					243.000-1-29	GUSC	Utility Corridor	Acquisition of 50-foot wide utility corridor easement, construction of approximately 170 linear feet of underground duct bank adjacent to Ellsworth Road (0.04 acres)
				0.75			224.000-1-4.1	County of Oneida	Utility Corridor	Construction of approximately 1,300 linear feet of underground sewer and water lines adjacent to Perimeter Road, transfer property within 50-foot wide utility corridor for sewer and water extension (0.75 acres) to City of Rome upon completion of construction activities, relocation of RBA concession stand, storage facilityand bullpen
				0.89			224.000-1-4.1	County of Oneida	Traffic Roundabout	Construction of traffic roundabout / realignment of Perimeter Road / new access road to Medical Center driveway with associated activities, transfer property within traffic roundabout to GLDC upon completion of construction activities (0.89 acres), potential to impact walkway around B52 Bomber site
								City of Rome	Utility Corridor / Traffic Roundabout	Tie-in to City of Rome sewer and water lines at the intersection of Perimeter Road and Mohawk Drive
					X			GUSC	Utility Corridor	Construction of approximately 170 linear feet of underground duct bank adjacent to Ellsworth Road (0.04 acres)

Source: C&S Engineers, Inc. 2024

Children's Environmental Health and Safety

The Proposed Project does not have the potential to lead to disproportionate impacts to health and/or safety risks to children. It will not create or make more readily available products or substances that could harm children via contact or ingestion through air, food, drinking water, recreational waters, or soil. The Proposed Project will not create or exacerbate existing adverse impacts to children in any of the impact areas (i.e., air quality, noise, water quality, etc.).

4.13.3 Mitigation

The following mitigation measures are recommended as part of the Proposed Project:

Traffic

- Design plans will be reviewed by NYSDOT.
- A Transportation Management Plan (TMP) would be prepared for the project to avoid or minimize temporary impacts to traffic, and transportation associated with project construction.
- Disruption of traffic in the construction area will be minimized to the greatest extent possible. Although the control of all construction-related inconveniences is not possible, motorist and pedestrian safety will be ensured by signing all construction areas. All lane closures, traffic shifts, short term detours, and changed travel patterns will be clearly marked. Access will be maintained to adjacent properties during construction.
- Coordination with property owners if changes to current plan take place.
- Coordination with property owners throughout construction period to address concerns and keep informed on progress of project.
- Replanting of any individual trees impacted by construction activities at a 1:1 ratio.
- Planting additional trees to provide a screen between one private property and realigned Perimeter Road
- Restore areas where existing pavement is removed to maintained lawn.
- Consideration should be given to construction of the noise barrier prior to construction activities related to the traffic roundabout and realignment of Perimeter Road to reduce construction noise to the four affected properties identified above (requested by one of the adjacent property owners at a meeting held on March 18, 2024)

[redacted] (Air Emissions)

- As users of each building are identified and the specifics of the build- out are identified, coordination with the NYSDEC will take place to determine if an air permit or registration is required. The project may remain under a common control for the overall development or if tenants/users/occupants become responsible for their own heat and all other sources of air pollution for the building/source under their control, the common control evaluation would be reassessed, and may result in the requirement for an individual permit for the occupant/tenant/user.
- If an air permit is required, an Analysis of pollution burden on disadvantaged communities (DACs) and preparation of an Existing Burden Report may be required by NYSDEC in compliance with the newly enacted state law.
- Air emissions sources will consider mitigation recommendations identified within the Climate Leadership and Community Protection Act (CLCPA)

Significance Threshold and Conclusions

The FAA does not provide a significance threshold for socioeconomics [redacted] or children's environmental health and safety risks. However, it does provide several factors to consider in evaluating the context and intensity of potential environmental impacts. These include when the action would have the potential to:

- Induce substantial economic growth in an area, either directly or indirectly (e.g. through establishing projects in an undeveloped area).
- Disrupt or divide the physical arrangement of an established community.
- Cause extensive relocation when sufficient replacement housing is unavailable.
- Cause extensive relocation of community businesses that would cause severe economic hardship for affected communities.
- Disrupt local traffic patterns and substantially reduce the levels of service of roads serving an airport and its surrounding communities.
- Produce a substantial change in the community tax base.
- [redacted]
- [redacted]
- Lead to disproportionate health or safety risks to children.

The Proposed Project will enable economic growth of a scale and nature that is being actively pursued to support the region's economic development priorities. The Proposed Project is located on currently undeveloped Airport property that has been specifically designated for this purpose and will not disrupt community cohesion or negatively impact social conditions. It will not cause residential or business relocation. Roadway traffic and level of service impacts will be minimized below significant impact thresholds with the incorporation of the recommended mitigation measures identified above. A master PILOT agreement for the Project Site will address revenue production and distribution for all applicable tax jurisdictions.

The Proposed Project will not cause a significant impact to socioeconomic conditions including population, housing, employment, economic activity, income, real property taxation, children's health and safety, public services and utilities, or social conditions. [redacted] Therefore, no significant impacts to Socioeconomics [redacted] and Children's Environmental Health and Safety impacts are expected.

4.14 Visual Effects

According to FAA Order 1050.1F, the FAA must evaluate the visual effects of the proposed action. According to 1050.1F Desk Reference Chapter 13 (Visual Effects), visual effects are broken into two categories: (1) light emissions and (2) visual resources and visual character.

- Light emissions include any light that emanates from a light source into the surrounding environment. Examples of sources of light emissions include airfield and apron flood lighting, navigational aids, terminal lighting, parking facility lighting, and roadway lighting.

- Visual resources include buildings, sites, traditional cultural properties, and other natural or manmade landscape features that are visually important or have unique characteristics. Visual resources may include structures or objects that obscure or block other landscape features.
- Visual character refers to the overall visual makeup of the existing environment where the proposed action and alternative(s) would be located. For example, areas close to densely populated areas generally have a visual character that could be defined as urban, whereas less-developed areas could have a visual character defined by the surrounding landscape features, such as open grass fields, forests, mountains, or deserts, etc.

Visual effects are based on the extent to which a project would either produce light emissions that create annoyance or interfere with activities, or contrast with, or detract from, the visual resources and/or visual character of the existing environment.[70]

4.14.1 Affected Environment

Light Emissions

The Project area consists primarily of undeveloped land (**Figure 4.33)**. Existing lighting sources within the Proposed Project limits include roadway lighting, and airfield lighting on the aircraft parking apron. Two residential areas border the northwestern and southern portions of the Project area.

Visual Resources and Character

As shown on **Figure 4.33**, existing viewsheds within the Proposed Project limits include paved roads; aircraft parking apron, taxiways, and hangars; mowed lawn areas; mowed lawn with trees, forested areas; two structures, and a shallow emergent marsh. Viewsheds adjacent to the Proposed Project limits are summarized below:

North of Project area: The existing viewshed north of the Project area consists of airfield development areas (runways and taxiways) and mowed lawn areas.

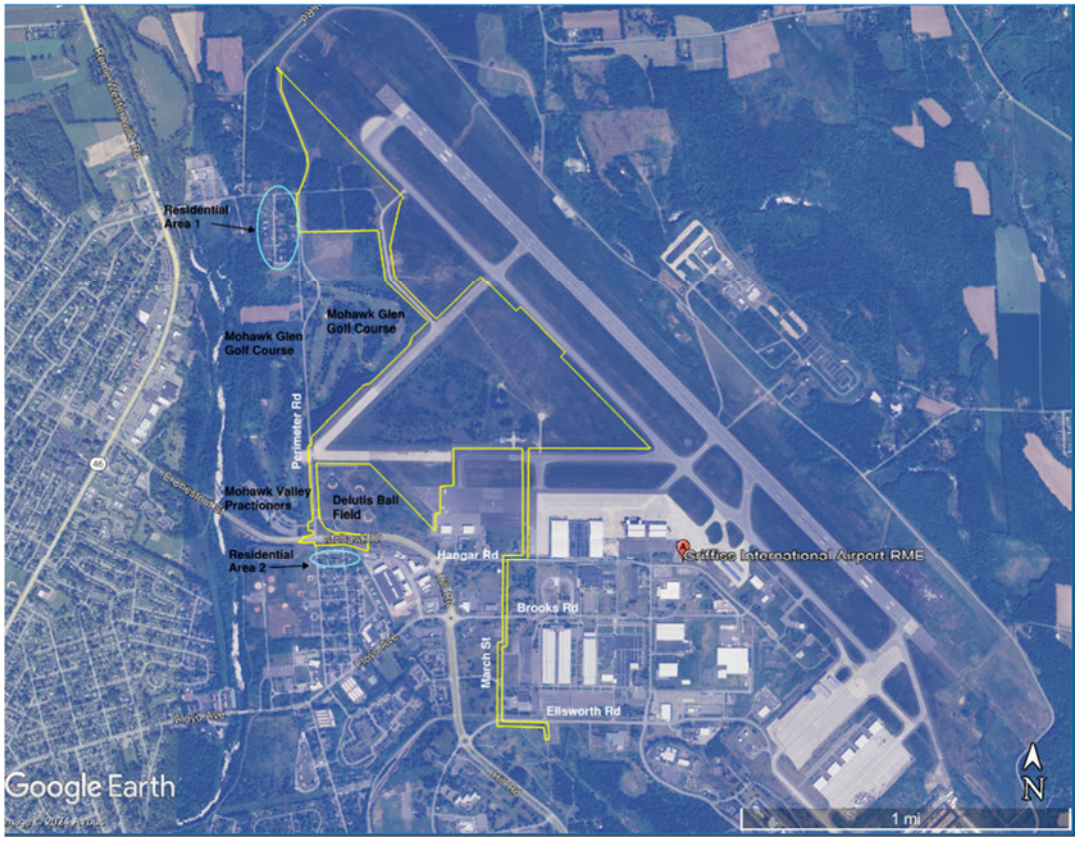
South of Project area: The existing viewshed south of the Project area consists of airfield development areas (aircraft parking apron, taxiways, airport buildings, and abandoned pavement), vacant land, mowed lawn areas, medical offices (Mohawk Valley Practioners), the DeLutis Ball Field, portions of the Mohawk Glen Golf Course, a residential area (Residential Area 2), paved roads, and commercial development.

West of Project area: The existing viewshed west of the Project area consists of portions of the Mohawk Glen Golf Course, paved roads, a residential area (Residential Area 1), vacant land, forested areas, and mowed lawn.

East of Project area: The existing viewshed east of the Project area consists of airfield development (aircraft parking apron, taxiways, airport buildings, automobile parking), roads, and commercial/industrial development.

[70] 1050.1F Desk Reference, page 13-1.

Figure 4.33 - Existing Viewsheds



Source: C&S Engineers, Inc.

4.14.2 Environmental Consequences

No Action Alternative

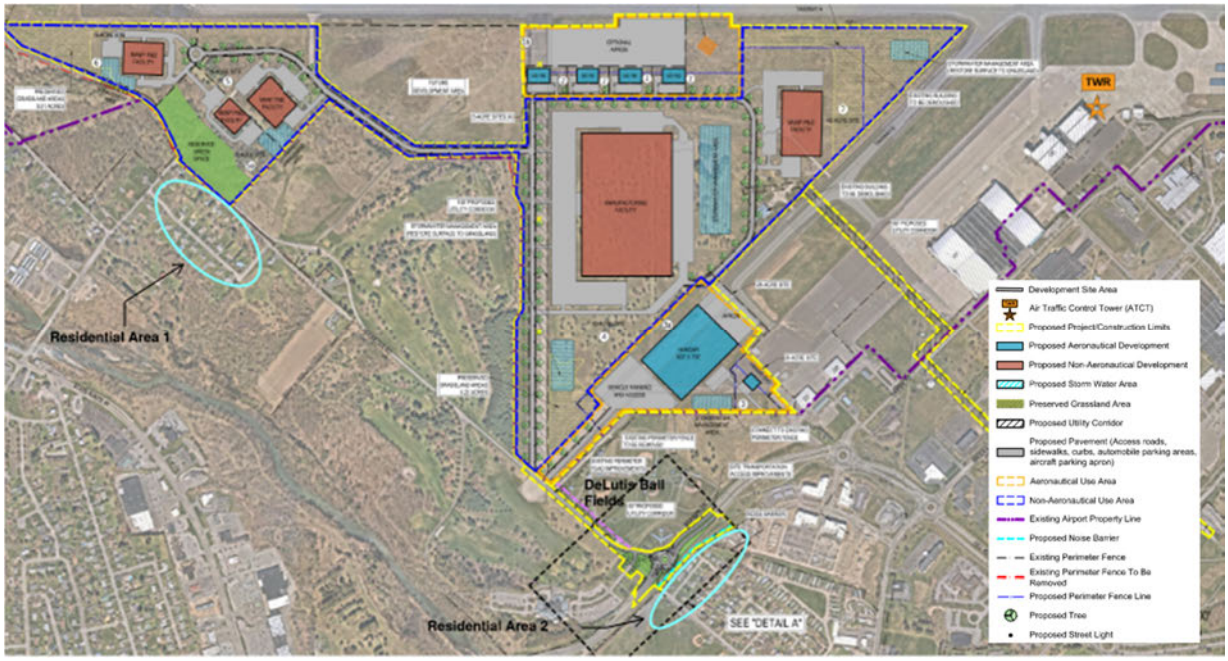
No development takes place with this alternative. Therefore, there would be no impacts related to light emissions or visual resources.

Proposed Project

Light Emissions

The Proposed Project would include landside facilities (i.e., manufacturing/R&D, UAS/R&D, or aircraft storage buildings, loading docks, truck staging, access roads, and employee parking), and airside facilities for aircraft (i.e., aircraft parking apron and taxiways). The Proposed Project will introduce lighting in an area where none has previously existed. Anticipated lighting consists of exterior wall-mounted flood lights for loading dock areas, 30-foot pole-mounted area lighting with one to four fixtures in employee parking lots, and pole-mounted lighting along access roads. The Proposed Project takes place in a built environment with existing lighting in place. Two residential areas and the DeLutis Ball Fields are located adjacent to the Proposed Project limits (**Figure 4.34**).

Figure 4.34 - Sensitive Sites for Light Emissions



Source: C&S Engineers, Inc.

Residential Area 1 is located approximately 1,380 feet from proposed access road lighting, 1,432 feet from employee parking lot lighting, and 2,572 feet from exterior wall mounted flood lights for proposed loading docks. Approximately 11 residential homes are located along North Bell Road or Perimeter Road. There are existing tree screens, reserved green space, and proposed tree plantings along access roads that will shield residences from Proposed Project lighting (**Exhibit 4.6**). Therefore, no lighting impacts are expected for residences located in Residential Area 1.

Residential Area 2 is located approximately 1,360 feet from proposed access road lighting, 1,872 feet from employee parking lot lighting, and 2,990 feet from exterior wall mounted flood lights for proposed loading docks. In addition, Residential Area 2 is located adjacent to proposed road improvements to Mohawk Drive (i.e., traffic roundabout). This area contains four residential properties. One home has existing trees and a screened six-foot fence that shields views of the Proposed Project. The three remaining homes have six-foot screened fencing that shield views of the Proposed Project at ground level. One home has a second-floor porch that would make components of the Proposed Project and associated lighting visible. However,

Exhibit 4.6 – Residential Area 1



Source: C&S Engineers, Inc.

current lighting existing along Mohawk Drive, and DeLutis Ball Fields contain flood lighting for night-time games. Ground level views from all residential homes are shielded and the Proposed Project includes construction of a 10-foot noise barrier wall between these residences and the road improvements on Mohawk Drive (i.e., traffic roundabout) (**Exhibit 4.7**). Additionally, the property owner with a second-floor balcony indicated they wouldn't want anything to block their views of the airport from their residence and did not indicate any concerns related to the proposed lighting (**Appendix Q**, page Q-96). Therefore, no lighting impacts are expected for residences located in Residential Area 2.

DeLutis Ball Field is located approximately 166 feet from proposed access road lighting, 386 feet from employee parking lot lighting, and 1,560 feet from exterior wall mounted flood lights for proposed loading docks. In addition, DeLutis Ball Fields are located adjacent to proposed road improvements with associated street lighting along Perimeter Road (**Exhibit 4.8**). The Rome Baseball Association leases property from Oneida County and is responsible for all ball field amenities, operations, maintenance, and upkeep. A meeting was held with the RBA director to discuss the Proposed Project and identify potential concerns (**Appendix Q**, pages Q-150 to Q-157). The RBA director expressed concerns related to Proposed Project lighting along roads and flood lighting that could affect visibility for ball players during night-time games (i.e., light glare). The use of hooded lights was discussed as a measure to prevent glare associated with street lighting and flood lights for building loading docks.

Visual Impacts

The Proposed Project would include landside facilities (i.e., manufacturing/R&D, UAS/R&D, or aircraft storage buildings, loading docks, truck staging, access roads, and employee parking), and airside facilities for aircraft (i.e., aircraft parking apron and taxiways). Current viewsheds within the Project area would change from vacant land (**Figure 4.33**) to developed land (**Figure 4.1**). Since this takes place within a built environment the change in viewshed is not considered significant.

The viewshed in areas adjacent to the Project area were also considered for potential impacts.

North of Project area: The existing viewshed north of the Project area consists of developed areas related to airfield operations (runways and taxiways) and mowed lawn areas. These viewsheds will not change because of the Proposed Project. Therefore, no significant visual impacts are expected.

West of Project area: The existing viewshed west of the Project area consists of portions of the Mohawk Glen Golf Course, paved roads, a residential area (Residential Area 1), vacant land, forested areas, and mowed lawn. As shown on **Exhibit 4.7**, tree screens between the Proposed Project and western viewsheds will remain. Therefore, viewsheds will not change and no significant visual impacts are expected.

Exhibit 4.7 – Residential Area 2



Source: C&S Engineers, Inc.

Exhibit 4.8 – DeLutis Ball Fields



Source: C&S Engineers, Inc.

South of Project area: The existing viewshed south of the Project area consists of airfield development areas (aircraft parking apron, taxiways, airport buildings, and abandoned pavement), vacant land, mowed lawn areas, medical offices (Mohawk Valley Practioners), the DeLutis Ball Field, portions of the Mohawk Glen Golf Course, a residential area **(Exhibit 4.7)**, paved roads, and commercial development. The viewshed adjacent to the DeLutis Ball Fields will change from abandoned pavement and vacant land to developed areas within the "Triangle Area" (access roads, automobile parking, stormwater management areas, and buildings). Perimeter Road improvements include a realignment of the road to tie into the proposed traffic roundabout (**Exhibit 4.8)**. As part of the road improvements, areas where pavement is removed will be converted to mowed lawn areas with tree plantings. The changes in viewshed are not considered significant since airfield development is already located in the Project area and roadway improvements include the addition of mowed lawn / landscaping with trees. Therefore, no significant visual impacts are expected.

East of Project area: The existing viewshed east of the Project area consists of airfield development (aircraft parking apron, taxiways, airport buildings, automobile parking), roads, and commercial/industrial development. Construction of the utility corridor will temporarily affect viewsheds. However, these areas will be restored to existing conditions. Therefore, viewsheds will not change and no significant visual impacts are expected.

4.14.3 Mitigation

It is recommended that street lighting and lighting fixtures located in the Proposed Project development area have downcast hoods to prevent lighting shining into homes or affecting the DeLutis Ball Fields or creating an annoyance.

4.14.4 Significance Threshold and Conclusions

The FAA has not established a significance threshold for visual effects in Exhibit 4-1 of FAA Order 1050.1F. The FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts for visual effects.

- Light Emissions Effects
  - The degree to which the action would have the potential to create annoyance or interfere with normal activities from light emissions.
  - The degree to which the action would have the potential to affect the visual character of the area due to the light emissions, including the importance, uniqueness, and aesthetic value of the affected visual resources.
- Visual Resources and Visual Character Effects
  - The degree to which the action would have the potential to affect the nature of the visual character of the area, including the importance, uniqueness, and aesthetic value of the affected visual resources.
  - The degree to which the action would have the potential to contrast with the visual resources and/or visual character in the study area.
  - The degree to which the action would have the potential to block or obstruct the views of visual resources, including whether these resources would still be viewable from other locations.

The Proposed Project lighting will not create an annoyance for people in the vicinity or interfere with normal activities, including work and recreation. Nor will the Proposed Project affect, obstruct, substantially alter, or remove visual resources including buildings, historic sites, or other landscape features, such as topography, water bodies, or vegetation, that are visually important or have unique characteristics. Potential off-airport impacts have been mitigated with tree replanting and/or restoration of areas. Therefore, no significant impacts to light emission or visual resource impacts are expected.

4.15 Cumulative Impacts[71]

4.15.1 Past, Present, and Reasonably Foreseeable Future Actions

To determine cumulative impacts to the environment, recent projects within the past three years, ongoing projects, and reasonably foreseeable projects within the next five years at the Airport are summarized in **Table 4.21.** The projects listed in **Table 4.21** have been implemented, are currently under construction, are under current planning, or are anticipated in the near future to bring the Airport into compliance with federal design standards, improve safety of Airport operations, and improve the facility's infrastructure.

4.15.2 Cumulative Impacts Comparison

The potential impacts from these projects were compared to the significance thresholds identified within FAA Order 1050.1F and the Desk Reference for each category to determine whether significant cumulative impacts would occur when combined with the Proposed Project.

This comparison only considers the environmental categories impacted by the Proposed Project along with the previous, current, and future projects. These categories include:

- Biological resources (habitat and T&E species)
- Water Resources (surface water)
- Historic, Architectural, Archeological, and Cultural Resources
- Department of Transportation, Section 4(f)
- Natural Resources and Energy Supply
- Socioeconomics and [redacted] Children's Environmental Health and Safety Risks (Traffic and Land Acquisition)

Although detailed project information is not available for the reasonably foreseeable future projects, the Airport will conduct the appropriate environmental reviews before construction and comply with all regulations. To provide a quantitative analysis and magnitude of impact, preliminary information was used. Impacts associated with identified past, present, and reasonably foreseeable projects are discussed in **Table 4.21**.

[71] At the time this Environmental Assessment was prepared, the White House Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 CFR Parts 1500-1508) directed FAA to analyze cumulative impacts. Those regulations were rescinded on April 11, 2025. Because the public was invited to comment on a draft of this EA including cumulative impact analysis, that analysis has been retained for the final EA.

Table 4.21 Cumulative Projects

Project	Project Description	Anticipated Year(s)
Existing Nose Dock/Hangar Building #782 - MVCC Classroom and Training space	The project involved converting 28,000 SF of hangar building #782 to airframe & powerplant (A&P) classroom and training space.	2021 (Past)
Existing Building #41 - Hangar Renovation	The project consisted of interior and exterior renovations, including toilet room/office renovations, roof replacement, parking lot renovations, natural gas heating system and associated natural gas service extension to the building.	2021 (Past)
Existing Building #100 - Rehabilitation for Drone Testing Facility (West Bay Sky Dome)	The project involved interior rehabilitations to convert the space into a drone testing facility. The project included rehabilitation to office, viewing, and toilet areas. The interior renovations involved primarily cleaning, prepping, and paint in finished areas, and installation of protective drone fly netting.	2022 (Past)
Taxiway E Connector , Pavement Reconstruction, & Pavement Removal	The project involved construction of a new Taxiway "E" connector (450' x 50') between the intersection of Taxiway "E" and "F" and extending to Apron #4. The taxiway connector used 850 feet of existing concrete pavement which was closed but in good condition. The project included associated lighting, signage, and markings. The project resulted in the reconstruction of approximately 75,000 SF of concrete pavement, removal of approximately 100,000 SF of existing concrete pavement, and construction of 35,000 SF of new pavement located within maintained turf areas. Areas proposed for concrete pavement removal were restored to grassland areas. The New York State Historic Preservation Office (NY SHPO) was contacted in regards to the potential of the proposed project to impact historic and/or cultural resources. The NY SHPO determined that no historic properties will be affected by this project.	2022 (Past)
Existing Nose Dock #786 Mercy Flight – New Shower/Laundry Room	The project included construction of a shower/laundry room for the "around the clock "staff of Mercy Flight, occupants of Nose Dock #786. Tasks included the extension of domestic water and sanitary waste from the existing building to the new shower/laundry room, lighting, power extension to the new shower/laundry room, sprinkler system and fire alarm modifications, and HVAC system.	2023 (Past)
Apron 1 & 2 Rehabilitation/Reconstruction	The project involves reconstruction of Apron 1 & Apron 2 pavement. The area of each Apron is approximately 1,700 feet long by 800 feet wide for an area of 151,000 SY. Total project area is approximately 315,000 SY. The project will also include replacement of the existing storm water trench drains that run the length of each apron with a new closed drainage system. The concrete pavement between the existing trench drains will be removed, replaced with asphalt, and sloped as required to direct the surface water to the proposed catch basins.	2024 (Ongoing)
Multi-Roof Repair	The project includes roof repair and roof replacement of Building #101 Bay #6 and Building #100 center core.	2024 (Ongoing)
Existing Building #100 - Exterior UAS Netted Enclosure	The project includes construction of an exterior netted enclosure on the west bay of Building #100 for drone flying/testing (UAS) at the recently constructed Sky Dome facility. The project includes the exterior netting, support structure and foundations on the apron side of the west hangar sky dome bay of Building #100.	2024 (Ongoing)
On and Off Airport Obstruction Removal	This project includes the mitigation of all obstructions on airport / county owned property and off-airport properties on which the Sponsor has access via an avigation easement (Oneida County Industrial Development Agency and Griffiss Local Development Corporation (GLDC) properties). This project will include the removal of approximately 54 acres of tree canopy areas on airport property, and 2 acres of tree canopy areas off airport property. Based on review of the Environmental Assessment (EA) prepared for this project, the project will have no impact on Section 4(f) or historic or archeological resources.	2025 (Future)
ATCT Renovation	The project involves renovating the existing contract Air Traffic Control Tower (ATCT). This project will include replacement of non-functional and aging ATCT equipment, tower/cab building components, and other miscellaneous and minor repairs to the structure. The project renovates an existing building, within its existing building envelope; no ground disturbance will occur.	2025 (Future)
Reconfigure/Reconstruct Taxiway A and Connecting Taxiway at Apron 1 & 2	The project involves reconfiguration and reconstruction of Taxiway A. To comply with the Airport Design Advisory Circular, the Taxiway A intersection will be reconfigured to provide 90 degree turns to eliminate direct access from Apron 1 onto Runway 33. The concrete pavement will be removed outside the limits of the new Taxiway A geometry and converted to turf areas. The project will include removal of the expansive Runway 33 holding bay and reconstruction of the unnamed taxiway interconnecting Aprons 1&2. The existing pavement will be reconstructed with a new full depth asphalt pavement section and include new pavement markings, airfield guidance signage and taxiway edge lights. All turf areas will be regraded to allow for proper drainage and to satisfy FAA grading requirements. Utilities will be reconfigured and replaced due to age or as needed to correspond to the new geometry. The reconfigured taxiways will be 75 feet wide with 35-foot-wide shoulders and approximately 2,000 feet in total length. The total new pavement area will be approximately 300,000 square feet with 200,000 square feet of permanent pavement removal.	2025 (Future)
Airfield Lighting Upgrades – LED RW 15 PAPI, Beacon, Wind Cones, Taxiway Guidance Signs	The project involves replacing existing airfield lighting, signage and navigation aid equipment distributed across the airfield. Replacement equipment includes the Runway 15 PAPI (4 box, airport owned and operated), rotating beacon (located on top of the ATCT cab), approximately 50 airfield taxiway guidance signs, one primary windcone and two supplemental windcones. Only equipment will be replaced and the existing foundations, power cables, conduit will remain as-is. All replacement equipment will be LED for a significant energy and maintenance costs savings. The existing fixture locations will not change and will generally be replaced with modern equipment of similar characteristics (height, dimensions, etc.). No ground disturbance is anticipated because of the proposed project.	2025 (Future)
Reconfigure/Reconstruct Taxiways D, H, & G Intersection	The project involves reconfiguration of the Taxiway D, H, and G intersection. In order to comply with the FAA Airport Design Advisory Circular, the Taxiway D-H-G intersection will be reconfigured to provide 90 degree turns to eliminate direct access from the Terminal Apron onto Runway 15-33 via Taxiway D. Taxiway H will be removed, the connection of Taxiway D (south of Taxiway A) will be removed and reconstructed further east. Taxiway G will remain as-is and the turf islands will be regraded for stormwater conveyance. Non-conforming (to design standards) concrete pavement will be removed and converted to turf. New pavement will be constructed with an asphalt pavement section and will include new pavement markings, signage and taxiway edge lights. The Project will include approximately twenty-five (25) taxiway edge lights,	2025 (Future)

	associated conduit and cable, and approximately four (4) airfield guidance signs. All turf areas will be regraded to allow for proper drainage and to satisfy FAA grading requirements. Stormwater piping, catch basins, and subsurface underdrains will be installed, however the existing drainage patterns will be maintained. Realigned Taxiway H will be approximately 35-feet wide and 170-feet in total length. The total new pavement area will be approximately 15,000 square feet and approximately 75,000 square feet of pavement will be permanently removed.	
Navmar Building #784 and #221 Renovations	This project will renovate and outfit existing building #784 and #221 to accommodate Navmar Applied Sciences Corporation's (NASC) expansion. The expanded facility will house NASC's flight operations, training facility, final customer acceptance facility and ultimately final manufacturing. All renovation work is primarily inside the existing building shell, and therefore there are no environmental impacts and no permits required. Design and renovation of Building #784 to include Architectural layout of the mezzanine (20'x70') for manufacturing/storage (open walls below), plumbing, sprinkler system, and electrical system upgrades. Design and renovation of Building #221 to include replacement of exterior man doors, including secured badge system, replacement of large rail style hangar doors with bi-fold doors, and kitchen upgrades.	2025 (Future)
Existing Building #100 -Ion Trap Research Room (Quantum Lab East Bay)	The project consists of a standalone ion trap research room for Griffiss Institute and Air Force Rome Lab. The project location is in the east bay of existing building 100 and consists of an approximately 1,500 SF ion trapping laboratory, including a connecting corridor from the existing building core to the laboratory and utility extension from the existing interior.	2025 (Future)
Existing Building #100 - West Annex Woman's Toilet Room	The project includes design and construction of a first-floor women's toilet room next to the existing men's room in the area previously used as Midair's reception space in Building #100. Tasks include architectural layout of the new toilet room, plumbing and sprinkler systems, HVAC systems, electrical systems, finish improvements in men's room as needed (ceiling tile replacement at a minimum).	2025 (Future)
Existing Building #101 - Foam Suppression Replacement	The project consists of the total replacement of the existing AFFF fire protection system (Aqueous film forming foam). The system presently serves bay 3, 5 and 6 of the building. Work involved includes replacement of the existing AFFF piping, tanks, proportioners, and electrical controls with proposed wet type suppression system and additional equipment rooms to house/support proposed wet type system equipment.	2026 (Future)
Existing Building #44 (Guggenheim Building) - Renovation	The project consists of total interior demolition/removal of all non-supportive interior walls and associated building trade supporting systems, and completely replacement of interior finishes, walls, ceilings, and floors, roof replacement, exterior wall repair and refinishing, exterior door replacement, parking lot reconstruction, extending natural gas service through the site to the building to serve the HVAC system and other gas fired equipment.	2026 (Future)
Airfield Pavement Repairs	The project involves isolated asphalt pavement repairs on Taxiways A, G, H, D, & K. The asphalt pavement will be milled and replaced to restore a smooth pavement surface. The project also includes select areas of concrete pavement repair on the Terminal Aprons. Asphalt pavement repair areas will be milled out at approximately 5-foot wide and replaced with new asphalt. The asphalt pavement repair area is estimated at 1,000 SY. A quantity of excavation and crushed aggregate base course will be reserved in case undercutting the stone subbase is required. Concrete pavement repairs will be limited to partial depth spall repair, crack repair and joint sealant repair. Concrete pavement repair areas are estimated at 5,000 SF. All work is taking place within previously disturbed areas that currently consist of asphalt and concrete pavement areas.	2026 (Future)
Fence Improvements Project	The project includes the removal and replacement of approximately 19,000 LF of security/wildlife perimeter fence and installation of approximately 5 gates and 2 gate operators. The project will include fence replacement, fence repairs, and localized areas of turf grading and stabilization to mitigate future turf erosion. It is anticipated that portions of the fence will include incorporation of crushed stone and/or fence fabric buried below grade as part of the fence line to protect against wildlife entry below the fence. The project may require up to approximately 2.75 acres of tree removal.	2027 (Future)
Sand Storage Building	The project involves the construction of an approximately 3,200 SF material storage building which would house approximately 600 cubic yards of airport friction sand and 300 cubic yards of rock salt. The proposed Sand/Salt Storage Building will be approximately 40-feet wide, 80-feet long and 30-feet high. The building will include access pavement for the loading and unloading of storage materials and will have heating and insulation to prevent the freezing of materials. The sand/salt storage building will be located adjacent to the existing Snow Removal Equipment (SRE) Storage Building. Review of the NY SHPO cultural resource information system (CRIS) indicates the project site is not located in a potential archeologically sensitive site.	2027 (Future)

Project construction dates are preliminary in nature. Prior to construction each project will undergo FAA planning and environmental review. Construction dates may also change based on availability of federal, state, and local funding.
Source: C&S Engineers, Inc.

Of the twenty-one (21) past, current, or future projects listed in **Table 4.21**, eighteen (18) consist of improvements to existing airport features or are renovation, repair, or rehabilitation/reconstruction type projects taking place upon or within previously disturbed and developed areas on Airport property. The projects are unlikely to create notable environmental impacts, other than short-term construction-related air quality and noise impacts. The projects do not: require tree removal, increase impervious surfaces, impact threatened or endangered species or their habitat, impact historic, archeological, or Section 4(f) resources, or result in significant socioeconomic impacts (business/residential relocation, avigation easements, traffic impacts, [redacted] etc.). Best Management Practices (BMPs) will be implemented during construction of these projects to minimize potential environmental impacts. Any potential water quality impacts related to stormwater will be addressed in accordance with the NYSDEC SPDES General Permit for Stormwater Discharges from Construction Activity, current New York State Standards and Specifications for Erosion and Sediment Controls, and the current New York State Stormwater Management Design Manual, as applicable. As with any construction projects, there will be short-term increases in electrical and gasoline usage to power construction equipment and for worker travel. The projects will use sustainable building practices utilizing electrical equipment, when feasible, and all work will comply with New York State Building and Energy Codes. There will be no increase in aircraft operations because of these projects. When these projects are considered with the Proposed Project, no cumulative impacts are anticipated.

Discussion of cumulative impacts related to the Taxiway E Connector project (past project), on and off airport obstruction removal project (future project), and new sand storage building (future project) is included below, where applicable.

Biological Resources

Habitat

The Proposed Project will result in a loss of 17.5 acres of successional northern hardwoods. This involves converting upland forested areas to paved access roads, paved automobile parking areas, stormwater management areas, and buildings. Losing 17.5 acres of successional northern hardwoods is not considered significant because it is a relatively small amount of successional northern hardwoods, and there are significant amounts of forested areas adjacent to the Airport for wildlife to migrate to (north and west contain 79 acres and east and south contain 436 acres).

Since the Proposed Project does not impact ecologically sensitive areas, is primarily taking place in a built environment, and includes restoring areas to mowed lawn/maintained grassland or landscaped areas where pavement will be removed, no significant impacts to ecological communities is expected. Minimization measures have been recommended to minimize impacts to ecological communities (**Section 4.3.3**).

With the exception of the future on and off airport obstruction removal and fence improvement projects, all of the other past, current and future projects listed in **Table 4.21** took place or are taking place within previously disturbed and/or paved areas on airport property, and did not require tree cutting or vegetation removal. The future on and off airport obstruction removal and fence improvement projects will cumulatively result in a loss of approximately 56.75 acres of trees on airport property.

The loss of 17.5 acres of forested area or a total of 74.25 acres cumulatively is not considered significant because it is a relatively small amount of successional northern hardwoods (14%), and there are significant amounts of forested areas adjacent to the Airport for wildlife to migrate to (north and west contain 79 acres and east and south contain 436 acres).

Cumulative impacts related to habitat alteration are not anticipated with the implementation of the recommended minimization/mitigation measures and the fact that additional forested habitat is located adjacent to the Airport that wildlife can migrate to.

Threatened and Endangered Species (T&E)

The Proposed Project will result in the permanent loss of 62.41 acres of breeding/nesting and foraging habitat (i.e., grassland habitat) used by the Upland Sandpiper from construction of roads, automobile parking areas, and buildings. The Proposed Project incorporates avoidance, minimization, and compensatory mitigation measures to compensate for the loss of Upland Sandpiper habitat (**Section 4.3.3**).

None of the past, current and future projects listed in **Table 4.21** are expected to result in the permanent loss of grassland habitat that would be suitable for use by the upland sandpiper. The sand storage building will result in the permanent loss of approximately 0.95 acres of maintained grassland but does not involve grassland that would be suitable for use by the Upland Sandpiper as the project site is surrounded by developed portions of the airfield rather than large open grasslands preferred by the upland sandpiper.

Cumulative impacts to T&E species are not anticipated with the implementation of the recommended avoidance, minimization, and compensatory mitigation measures recommended in **Section 4.3.3**. Also, past, ongoing, and future projects have been or will be coordinated with relevant environmental agencies to mitigate the potential for any adverse impacts.

Water Resources

The Proposed Project will result in an increase of 68.03 acres of increase impervious surfaces in the Project area which will result in increased runoff. Stormwater runoff from the newly created impervious areas will be able to be mitigated onsite using proper stormwater management infrastructure (i.e., stormwater drainage basins, dry swales, and installation of new drainage pipes). The Proposed Project involves more than one-acre of ground disturbance. Therefore, coverage under the NYSDEC State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity (Permit No. GP-0-20-001) will also be required for the Proposed Project. This will include preparation of a Stormwater Pollution Prevention Plan (SWPPP). Mitigation measures have been recommended to minimize impacts to water resources. (**Section 4.4.3**).

Except for the future sand storage building, all of the other past, current and future projects listed in **Table 4.21** are not expected to result in a net increase in impervious surfaces. The future sand storage building will result in a minor increase of 0.95 acres of impervious surfaces. The sand storage building project will be constructed consistent with NPDES and SPDES requirements; therefore, no significant impact from any increase in stormwater runoff is anticipated.

The increase of 68.03 acres of impervious area or a total of 68.98 acres cumulatively is not considered significant. Cumulative impacts to water resources are not anticipated with the implementation of the mitigation measures recommended in **Section 4.4.3**. Also, past, ongoing, and future projects have been or will be coordinated with relevant environmental agencies to mitigate the potential for any adverse impacts and will be consistent with NPDES and SPDES requirements. Past and ongoing projects have received, and future projects will receive, regulatory approvals or permits consistent with the state's water quality standards.

Historic, Architectural, Archeological, and Cultural Resources

The Project area ("Triangle Area") encompasses an archeological site (PCI Site #24) that has been recommended as eligible for listing in the NYS and National Register of Historic Places. Mitigation measures have been recommended to minimize impacts to archeological resources (**Section 4.7**). The Proposed Project avoids impact to PCI Site #24 by protecting the site from ground disturbing activities.

All of the past, current and future projects listed in **Table 4.21** are taking place in previously disturbed areas and therefore, will have no effect on archeological resources, or have been reviewed by NY SHPO and determined to have no effect on historic or archeological resources. In addition, none of the projects listed in **Table 4.21** is taking place within the Project area ("Triangle Area"), therefore they will have no impact on

PCI Site #24. Therefore, no cumulative historic, architectural, archeological, or cultural resource impact are anticipated.

Department of Transportation, Section 4(f)

The Proposed Project includes the construction of a utility corridor and acquisition of an easement on Section 4(f) property. None of the past, current, and future projects listed in **Table 4.21** will impact a Section 4(f) property. All the projects are taking place within Airport property except for off airport obstruction removal, which is not occurring on a Section 4(f) property. Therefore, no significant cumulative Section 4(f) impacts are anticipated.

Natural Resources and Energy Supply

Operation of the Proposed Project would result in an increase in the discharge of wastewater into the sewer collection system and an increase in use of potable water. The Proposed Project would also generate a need for additional electrical power and natural gas for the new facilities. As detailed in **Section 4.11**, coordination with respective public utility providers has occurred and any necessary upgrades or new infrastructure has been incorporated into the Proposed Project. With inclusion of the identified upgrades and infrastructure improvements, no negative impacts to existing utilities are anticipated because of the Proposed Project.

None of the past, current, and future projects listed in **Table 4.21** will significantly impact natural resources and energy supply. As with any construction project, there will be short-term increases in electrical and gasoline usage to power construction equipment and for worker travel. Any past, ongoing, and future projects have been or will use sustainable building practices utilizing electrical construction equipment, when feasible.

No significant cumulative natural resource and energy supply impacts are anticipated.

Socioeconomics [redacted] Children's Environmental Health and Safety Risks (Traffic)

The Proposed Project would require roadway improvements when site development reaches 30% of full build out. Roadway improvements at the intersection of Route 825 (traffic roundabout) and realignment of Perimeter Road will be required to address levels of service deficiencies. As detailed in **Section 4.13**, coordination with NYSDOT has occurred. With inclusion of the roadway improvements, no significant impacts to traffic patterns and roadways are anticipated because of the Proposed Project.

The past, current, and future projects listed in **Table 4.21** take place on airport-property and will not affect off-airport roads or traffic patterns.

No significant cumulative traffic impacts are anticipated.

4.16 List of Anticipated Permits, Approvals, or Reviews

All permits, approvals, or reviews would be obtained prior to construction. The permits or approvals that may be required for the Proposed Project are summarized below.

- Coverage under the NYSDEC State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity (Permit No. GP-0-20-001/GP-0-25-0001) to include the following:
  - Stormwater Pollution Prevention Plan (SWPPP).
  - The developer is required to apply for coverage under Permit No. GP-0-20-001 prior to starting construction activities.
  - If disturbing five or more acres of soil at any one time, in addition to requiring the General Permit for Construction Activity, written authorization from the Regional Water Engineer will be required.

- Review NYSDEC SWPPP transition from GP-0-20-0001 to GP-0-25-0001 to determine which Construction General Permit (CGP) will be required.
- SWPPPs must clearly identify which Design Manual (2015 or 2024) was used for design (s) and MS Operator/s must review the SWPPPs against the relevant Design Manual/s identified.
- Analysis of pollution burden on disadvantaged communities (DACs) and preparation of an Existing Burden Report may be required by NYSDEC in compliance with the newly enacted state law.

- Obtain an NYSDEC Part 182 Incidental Take Permit.
- Air permits including Title V, Air State Facility (ASF), and Air Facility Registrations (AFR) will be obtained prior to construction (groundbreaking) as needed.
  - Analysis of pollution burden on disadvantaged communities (DACs) and preparation of an Existing Burden Report may be required by NYSDEC in compliance with the newly enacted state law.
- Public Water Requirements
  - Form DOH-348, "Application for Approval of Plans for Public Water Supply Improvement".
  - Engineer's Report demonstrating a water supply of sufficient quantity and quality.
  - Water supply distribution network details and notes shown on plans.
- Public Sewage
  - Sewer and storm water plans submitted to DEC for review.
  - Any new connection must be reviewed and approved by the sewer service provider to certify their ability and willingness to service the development.
- FAA Form 7460 Notice of Proposed Construction.
- Combustion sources/generator permits, if applicable.

5 Agency Coordination and Public Involvement

5.1 Agency Coordination and Meetings

Information request letters were sent to federal, state, county, and local agencies several times with responses as summarized below:

- 2021 Initial request letters (**Appendix D**, pages D-2 to D-40) and responses (**Appendix D**, pages D-41 to D-62).
- 2022 letters (**Appendix D**, D-64 to D-106) and responses (**Appendix D**, pages D-107 to D-115).
- 2023 letters (**Appendix D**, pages D-116 to D-172) and response (**Appendix D**, pages D-173 to D-184).

Additional coordination and meetings took place with the agencies below:

- Monthly meetings held with Oneida County team made up of airport staff, County executive's office, County economic development agencies, County planning, County attorney's office, and C&S staff.
- City of Rome (**Appendix Q**, pages Q-1 to Q-27).
- Griffiss Land Development Corporation (GLDC) / Oneida County Industrial Development Agency (OCIDA) / Griffiss Park Landowners Association (GPLA) (**Appendix Q**, pages Q-29 to Q-39, and pages Q-137 to Q-148).
- Griffiss Utility Services Corporation (GUSC) (**Appendix Q**, pages Q-67 to Q-78).
- NYSDOT (**Appendix D**, pages D-221 to D-244) and (**Appendix Q**, pages Q-118 to Q-136).
- NYSDEC (**Appendix D**, pages D-185 to D-220).
- NYSHPO (**Appendix D**, pages D-245 to D-300).

5.2 Public Information Meetings

During the Draft EA preparation, the County conducted meetings with private property owners or entities directly affected or located adjacent to the Proposed Project.

- Property owners adjacent to proposed noise barrier (**Appendix Q**, pages Q-88 to Q-117 and Q-221 to Q-224).
- Property owners affected by the proposed traffic roundabout and realignment of Perimeter Road (**Appendix Q**, pages Q-79 to Q-87).
- Property owner for new Upland Sandpiper conservation easement (**Appendix Q**, pages Q-159 to Q-164).
- County lessee affected by utility corridor along Perimeter Road (**Appendix Q**, pages Q-149 to Q-157).

5.3 Draft EA Notifications and Distribution

The Draft EA and Draft Section 4(f) Determination were available for review by the public, government agencies, affected property owners, and interested parties for a period of 30 days (December 17, 2024, to

January 17, 2025) and was extended for an additional 30 days (until February 17, 2025) for a total of 60 days. The Notice of Availability (NOA) of the Draft EA and Draft Section (4) Determination was published on December 17th and December 26th, 2024, in The Observer Dispatch and Rome Daily Sentinel (**Appendix Q**, pages Q-165 to Q-172). The NOA was also posted on the County website at https://oneidacountyny.gov/departments/planning/public-notices/. Copies of the Draft EA were made available for review at the following locations:

- Griffiss International Airport, 660 Hangar Road, Suite 223, Rome, NY 13441
- Jervis Public Library, information desk, 613 N Washington Street, Rome, New York 13440

In addition, affected property owners were notified by letters of the availability of the Draft EA and Draft Section 4(f) Determination for review and comments as well as the extended comment period (**Appendix Q**, pages Q-173 to Q-186). Government and environmental agencies were notified by letters and/or email of the availability of the Draft EA and Draft Section 4(f) Determination for review and comments as well as the extended comment period (**Appendix Q**, pages Q-187 to Q-194).

5.4 Public Open House

A Public Open House was held to present the results of the environmental studies and receive comments on the Draft EA and Draft Section 4(f) Determination (**Appendix Q**, pages Q-195 to Q-215). The Open House displayed informational boards and County / Consultant staff were available to answer questions. Written comment forms were provided for those that wished to submit comments in writing. The meeting was conducted from 6:00 p.m. to 8:00 p.m. on January 20, 2025, at the Innovare Advancement Center, Conference Room, 2nd Floor, Griffiss International Airport, 592 Hangar Road, Rome, NY 13441. The Open House had approximately 41 people in attendance (**Appendix Q**, pages Q-216 to Q-218) and two comment forms were received (**Appendix Q, pages Q-219 and Q-220**).

5.5 Public Comments

The County accepted written comments on the Draft EA and Draft Section 4(f) Determination by letters and email. As required by FAA guidance, all comments received from the public, involved agencies within the 60-day public comment period were considered in preparing the Final EA.

Public Comments

No comments were received from the public on the Draft EA and Draft Section 4(f) Determination.

Agency Comments

Comment letters were received from seven involved agencies: NYSDEC, EPA/EPA Superfund, USFWS, NYSDOT, Air Force, and NYS Department of Agriculture (**Appendix D**, pages D-358 to D-376) and a response to agency comments was provided (**Appendix D**, pages D-377 to D-401). Agency comments focused on the following:

Hazardous Materials:

- Air Force
  - Air Force has been evaluating the presence of Per- and polyfluoroalkyl (PFAS) at the former Griffiss Air Force Base since 2014. The Air Force recommended adding language to the EA regarding past, current, and planned PFAS activities.
- EPA
  - EPA suggested including a response and mitigation plan should PFAS be encountered during the construction phase of the project.
  - Encourage coordination with EPA Region 2's Superfund and Emergency Management Division to ensure plans for the use of the facilities that are constructed incorporate the Phase I and Phase II site assessments.
- EPA Superfund
  - Make it clear that EPA Region 2, NYSDEC, and NYSDOH have provided oversight of the Air Force environmental activities at the former base for over 30 years.
  - Identified specific Air Force, NYSDEC, and NYSDOH contacts to continue coordinating with.
  - A thorough discussion of PFAS at the former Griffiss Air Force Base needs to added to the EA
  - Add a figure showing the location of all suspected and actual PFAS contamination in and near the project area.
  - Coordination needs to take place with identified EPA, NYSDEC, and NYSDOH representatives regarding the potential for encountering PFAS contamination and how to handle prior to, during, and after construction.
  - Report should indicate that a full base-wide Remedial Investigation (RI) for PFAS is required by CERCLA and scoping for the RI has not begun yet.
  - Requested all data from the Phase I and Phase II ESAs be provided to the Air Force.

Air Quality:

- NYSDEC
  - Facility is in an ozone transport region (OTR) and is regulated as if in non-attainment for ozone and the *de minimis* thresholds for NOx (100 tons per year) and VOCs (50 tons per year) are the appropriate thresholds to cite in the analysis.
  - The proposed development may require an air facility registration or an air permit for the stationary sources.
  - Environmental Justice: The impact of any proposed emissions and whether that would be considered acceptable would be determined based on the permit application for a specific user. DEC would need more information to determine if the emissions would be considered acceptable[72].
  - Construction of infrastructure based on the utilization of natural gas may not be consistent with the Consideration of the Climate Leadership and Community Protection Act (CLCPA).
  - Portions of the proposed Airport Business Park are located within 0.5 mile of a mapped disadvantaged community. CLCPA Section 7(2) and Section 7(3) analysis will be required of any forth coming air permit application.

[72] Environmental Justice is not considered or analyzed in this Environmental Assessment in compliance with Executive Order 14148 and Executive Order 14173.

Water Resources:

- NYSDEC
  - Noted public water, sewage, and SPDES General Permit requirements.
  - DEC's amended Article 24, Freshwater Wetlands Jurisdiction and Classification regulations went into effect on January 1, 2025. To determine whether a property contains regulated freshwater wetlands the project sponsor must submit a request for a Parcel Jurisdictional Determination (Parcel JD).

Environmental Justice[73]:

- NYSDEC
  - The Environmental Justice (EJ) Site Law became effective December 30, 2024. Construction of a new facility located within 0.5-mile of a disadvantaged community will require review under the EJ Siting Law during the SEQRA process.
  - The EJ Siting Law requires DEC to incorporate environmental justice into the consideration of certain prescribed Uniform Procedures Act permits, including Article 17 SPDES and Article 19 air permits. Both of which could potentially be relevant and require consideration of existing burdens in existing disproportionate pollution burden on disadvantaged communities and preparation of an existing burden report.

Threatened and Endangered Species:

- USFWS
  - Official Species List is outdated and should be updated.
  - An evaluation of the monarch butterfly which is now a proposed threatened species should be evaluated in the EA.
  - The Determination Key (D-Key) should be rerun since it was updated in October and now includes the tri-colored bat.
  - A request for ESA Section 7 consultation or concurrence on a determination by the FAA/non-federal representative has not been received.
  - The ESA review should be updated to consider habitat suitability for bats associated with the proposed tree removal and an evaluation of the monarch butterfly.

Cultural Resources:

- NYSDOT
  - Make sure the sound wall was included in the Cultural Resources coordination.
  - Any discussion on who will maintain the noise wall (Oneida County or GLDC)?

[73] Environmental Justice is not considered or analyzed in this Environmental Assessment in compliance with Executive Order 14148 and Executive Order 14173.