Chapter 4.0 Environmental Consequences

4.1 Introduction

This chapter of the Environmental Assessment (EA) presents an analysis of the reasonably foreseeable impacts of the Preferred Alternative when compared with those of the No Action Alternative, as well as mitigation measures to avoid or minimize such impacts. Each resource category listed below includes an analysis of the topic relative to the Preferred Alternative and the No Action Alternative, as well as any suggested mitigation plans. **Table 4-3 Mitigation Summary of the Preferred Alternative** at the end of this chapter provides a summary of impacts and mitigation associated with the Preferred Alternative.

To help identify measures to first avoid, then minimize, and lastly mitigate impacts of the Preferred Alternative, the Gary/Chicago International Airport (Airport or GYY), the Federal Aviation Administration (FAA), and various other regulatory agencies with jurisdiction or permitting authority over a particular resource in the project area provided assistance and guidance.

For additional details and justification of why the project is needed, see **Chapter 1.0 Purpose and Need**. For a detailed discussion of alternatives including the Preferred Alternative, see **Chapter 2.0 Alternatives Considered**. **Chapter 3.0 Affected Environment** describes the existing environmental conditions of the potentially affected geographic area where the Preferred Alternative would occur.

4.2 Air Quality

No Action Alternative

The No Action Alternative does not propose the construction of any air cargo infrastructure. Therefore, no air quality impacts would be expected under this alternative.

Preferred Alternative

The Preferred Alternative is in a moderate nonattainment area for the 2015 8-hour ozone standard. However, the construction of the proposed project is included on the Presumed to Conform Project Descriptions and Justifications list in Federal Presumed to Conform Actions Under General Conformity, 72 Fed. Reg. 41,565, 41,571 (July 30, 2007) under “Non-Runway Pavement Work.” Therefore, the Preferred Alternative is not anticipated to cause or contribute to any violation of the National Ambient Air Quality Standards (NAAQS).

Temporary air quality impacts, such as the creation of dust from ground disturbing activities, would result from implementation of the Preferred Alternative, but long-term impacts are not expected

Mitigation of the Preferred Alternative

Since no long-term impacts are anticipated, no specific mitigation is proposed. However, to further reduce the potential for temporary air quality impacts for both workers and the surrounding area, the following recommendations should be considered during the construction of the Preferred Alternative. These recommendations may be implemented and incorporated by the Airport during construction where feasible:

- Use low-sulfur diesel fuel (less than 0.05 percent sulfur).
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Position the exhaust pipe so that the diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- Use catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Use climate-controlled cabs that are pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operator's exposure to diesel fumes. Pressurization ensures that air is moved from the inside to the outside. HEPA filters ensure that any incoming air is filtered first.
- Regularly maintain diesel engines, which is essential to keeping exhaust emissions low, and follow the manufacturer's recommended maintenance schedule. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel operators to perform routine inspections, and maintaining filtration devices.
- Purchase new vehicles that are equipped with the most advanced emission control systems available.
- With older vehicles, use electric starting aids such as block heaters to warm the engine to reduce diesel emissions.

4.3 Biological Resources (Including Fish, Wildlife, and Plants)

4.3.1 Endangered and Threatened Species

No Action Alternative

The No Action Alternative assumes there would be no construction of any air cargo infrastructure or any ground disturbance. No impacts to biological resources would be expected under this alternative.

Preferred Alternative

As explained in **Section 3.6.1** of **Chapter 3.0 Affected Environment**, a qualified biologist conducted a habitat assessment for a 68-acre Project Study Area (PSA) in the northwest portion of the Airport in October 2023 to determine the presence of threatened and endangered species and evaluate potential impacts from the proposed project at the federal and state level. This assessment consisted of a preliminary literature and database review of federal and state listed endangered, threatened, and rare (ETR) species as well as on-site field observations of the habitat composition of the site. A species-specific presence/absence survey

was not conducted. The *Rare, Threatened, and Endangered Species and Special Habitat Observation Report* that was completed for the PSA is provided in **Appendix D – Biological Resources**.

Literature and Database Review

A review of threatened and endangered species information provided in the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) database for the PSA identified five federally endangered, proposed endangered, experimental population, or candidate species (**Table 4-0 USFWS Endangered and Threatened Species List**).

Table 4-0
USFWS Endangered and Threatened Species List

Species Name	Common Name	Status
Myotis sodalis	Indiana Bat	Endangered
Myotis septentrionalis	Northern Long-eared Bat	Endangered
Perimyotis subflavus	Tricolored Bat	Proposed Endangered
Grus americana	Whooping Crane	Experimental Population, Non-essential
Danaus plexippus	Monarch Butterfly	Candidate

Source: U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) Database

The Monarch Butterfly is a candidate species and is not yet listed or proposed for listing. Consultation with USFWS under Section 7 of the Endangered Species Act (ESA) of 1973 (16 U.S.C. § 1531-1544) and subsequent amendments is not required for candidate species although project components should be considered or implemented to best support the species.

The USFWS classifies the Whooping Crane as a non-essential experimental population, which is defined as a population that has been established within its historical range under section 10(j) of the ESA to aid recovery of the species. The USFWS has determined that a non-essential population is not necessary for the continued existence of the species. For the purposes of consultation, non-essential experimental populations are treated as threatened species on National Wildlife Refuge and National Park land (required consultation under 7(a)(2) of the ESA) and as a proposed species on private land (no section 7(a)(2) requirements, but federal agencies must not jeopardize their existence (section 7(a)(4)).

USFWS proposes to list the Tricolored Bat as endangered under the ESA and, if finalized, will extend the ESA's protections to this species. Therefore, for the purposes of this EA, the Tricolored Bat will be considered as protected under the ESA.

According to the IPaC Report, no critical habitat under USFWS jurisdiction for the species in **Table 4-0 USFWS Endangered and Threatened Species List** exists in the PSA.

In addition to USFWS consultation, coordination with the Indiana Department of Natural Resources (IDNR) Division of Nature Preserves was undertaken to search the Natural Heritage Database (NHD) for documented occurrences of ETR species within the PSA and a surrounding five-mile radius, and protected

bat occurrences within a five-mile radius of the PSA. A summary of the 62 federal and state species documented within 0.5 miles of the PSA is provided in Table 3.1.1 in the *Rare, Threatened, and Endangered Species and Special Habitat Observation Report* in **Appendix D – Biological Resources**.

Field Assessment

An onsite assessment of the PSA was conducted on October 30, 2023. During the assessment, the site vegetation was characterized, which included a variety of habitats such as emergent wetland, dune and swale, and sandy prairie. During the survey of the site, no ETR species from the IDNR NHD or USFWS IPaC database were observed.

The potential for ETR species from the state or federal lists to occur within the PSA was determined based on habitat observations. The probability of occurrence on site was deemed to range from no probability of occurrence to a high probability of occurrence for most species (see Table 3.1.1 in the *Rare, Threatened, and Endangered Species and Special Habitat Observation Report* (Report) in **Appendix D – Biological Resources**).

Due to its proximity to intact habitat, wetlands documented within the site have a high probability of harboring a wide diversity of plants and animals, some of which might be listed in Table 3.1.1 of the Report found in **Appendix D – Biological Resources**. The various wetlands are mostly intact, vegetatively. An abundance of Green Bulrush, Beggarticks, dense areas of Cattail, along with other emergent and semi-emergent plants that provide habitat and food for birds and turtles, increase the probability of occurrence for animals listed in Table 3.1.1 of the Report in **Appendix D – Biological Resources**.

The sandy prairie and dune and swale habitat also have the potential to harbor state and federally noted plants and animals. Insects that utilize prairie grasses and forbs as host plants, such as the Monarch Butterfly (*Danaus plexippus*), Dusted Skipper (*Atrytonopsis hianna*), and Bunchgrass Skipper (*Problema byssus*) may occur within these areas. Additionally, bunching prairie grasses common to sandy prairies and the upland dunes of the dune and swale habitat often serve as a food source for common insects preyed upon by migrating songbirds, such as the Sandhill Crane (*Antigone canadensis*) and Whooping Crane (*Grus americana*).

Due to the proximity to intact dune and swale habitat appropriate for the Blanding's Turtle (*Emydoidea blandingii*) and the Spotted Turtle (*Clemmys guttata*), it is possible that these species could utilize emergent wetlands as a nesting habitat. The abundance of sandy substrate surrounding emergent wetlands serves as nesting material for many species of turtles.

Qualified biologists also surveyed the PSA to identify potential Indiana Bat, Northern Long-eared Bat, and Tricolored Bat roost trees. Based on the field inspection and the biologist's professional judgment, a potential bat roost site was identified across Airport Road within the PSA. The site was a stand of approximately 20 or more dead ash trees that borders woodlands and what appears to be a wetland with a stand of common reed as the dominant plant species. Although these trees are in the PSA, they are outside the project area.

Conclusion

The PSA includes emergent wetlands and mixes of sandy prairie and dune and swale habitat. All three habitats within the PSA meet ETR species habitat requirements for state listed plants and animals.

An additional area of approximately 0.2 acres of wetland with 20 or more dead ash trees was identified across Airport Road within the PSA. These trees are potential bat roost trees that are suitable for harboring the federally endangered Indiana Bat or Northern Long-eared Bat. As explained above, however, these trees are in the PSA but outside the project area. Therefore, these trees will not be impacted under the Preferred Alternative.

A qualified biologist conducted an additional analysis of the PSA in July 2025 using IPaC Consultation Package Builder (CBP). CBP is a step-by-step consultation process that leverages USFWS data and recommendations and guides users through evaluating and documenting a project's potential effects on species protected by the ESA. This process provided recommended effect determinations for federal species within the PSA. These effect determinations are provided in **Table 4-1 Recommended Effect Determinations from IPaC Consultation Package Builder**.

Table 4-1
Recommended Effect Determinations from IPaC Consultation Package Builder

Common Name / Species Name	Status	Present in Project Study Area	Effect Determination
Indiana Bat (*Myotis sodalis*)	Endangered	No	No Effect
Northern Long-eared Bat *(Myotis septentrionalis)*	Endangered	No	No Effect
Monarch Butterfly *(Danaus plexippus)*	Proposed Threatened	Excluded from Analysis	Excluded from Analysis
Whooping Crane (*Grus americana*)	Experimental Population, Non-essential	Excluded from Analysis	Excluded from Analysis
Piping Plover (*Charadrius melodus*)	Endangered	No	No effect

Source: USFWS IPaC Consultation Package Builder, July 2025

It should be noted that when the additional analysis using IPaC CBP was conducted in July 2025, the USFWS no longer listed the Tricolored Bat in the PSA. The USFWS also added the Piping Plover (Charadrius melodus) as being potentially present in the PSA. The Piping Plover is a sand-colored, sparrow-sized shorebird that nests and feeds along coastal sand and gravel beaches.

The potential for impacts to federal and state ETR species is discussed below.

Indiana Bat and Northern Long-eared Bat

A small area of approximately 20 standing dead ash trees was observed across Airport Road within the PSA. This area is outside of the project area. No habitat was observed in the project area. Therefore, the proposed project will have no effect on the Indiana Bat or Northern Long-eared Bat.

Monarch Butterfly
Although there are host plants and some nectar plants in the PSA, there are no large areas of native, undisturbed prairie. Therefore, the Monarch Butterfly was excluded from the analysis.

Whooping Crane
There are some wetland areas that could provide stop-over habitat in the PSA for Whooping Cranes. However, the PSA is located adjacent to an existing airport with intense development in the surrounding areas. It is unlikely that this area would be suitable for Whooping Cranes. Therefore, the Whooping Crane was excluded from the analysis.

Piping Plover
The PSA is not along the shoreline of any large body of water. Since no habitat is present in the PSA, the proposed project will have no effect on the Piping Plover.

State ETR Species
IPaC CBP does not provide recommended effect determinations for state ETR species. However, due to the presence of emergent wetlands and mixes of sandy prairie and dune and swale habitat within the PSA that meet state ETR species requirements, construction or operation of the Preferred Alternative may have impacts on these species.

Mitigation of the Preferred Alternative
Prior to construction further coordination with the IDNR is warranted to include state ETR species-specific presence/absence surveys and take permits.

Per IDNR, the use of best management practices (BMPs) for soil erosion and runoff should be utilized during project activities to minimize direct and indirect impacts to any ETR habitat. Proper dust control measures should be implemented. IDNR also requested that any project materials or equipment used adjacent to or within the PSA be cleaned per BMPs to help prevent the spread of invasive or noxious plant species.

To protect ETR vascular plant species within or adjacent to the expected ground disturbing activities, surveys should be conducted by qualified personnel for the species prior to construction. If species are identified the area should be flagged and taped off to lessen the possibility of impact to the ETR species.

4.3.2 Migratory Birds

No Action Alternative
The No Action Alternative assumes there would be no construction of any air cargo infrastructure or any ground disturbance. No impacts to migratory birds would be expected under this alternative.

Preferred Alternative
The habitat assessment described in **Section 4.3.1 Endangered and Threatened Species** identified 16 bird species protected under the Migratory Bird Treaty Act of 1918 (MBTA), or birds protected under the

Bald and Golden Eagle Protection Act of 1940 (Eagle Act) potentially within the PSA. These bird species are listed in Table 3.1.2 in the Report found in **Appendix D – Biological Resources**.

The PSA falls within the Mississippi Migratory Bird Flyway where Lake Michigan plays a critical role in directing movement of large single or mixed species flocks of waterfowl, shore/wading birds, songbirds, and larger birds of prey such as bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*). Migrating birds move along Lake Michigan's western and eastern shorelines primarily within the months of April and May for spring migration and August and September for fall migration. Rare or endangered migratory birds are regularly documented along the southern tip of Lake Michigan during these periods of the year with migratory birds often congregating in the northern portions of Lake and Porter Counties in Indiana.

While some of these migratory birds breed in the southern Lake Michigan region, more than just breeding season should be taken into consideration when impacting potential habitat. Migration periods in which rare or endangered migratory birds are regularly documented along the southern tip of Lake Michigan also has a direct impact on the overall success of individual species of migratory birds. Due to the proximity of the PSA to managed natural areas and the Lake Michigan southern shoreline, migrating birds may utilize the wetlands within the project site as a stopping ground during their flight to and from regions of the Americas where they reproduce.

Disruption of habitat during breeding/nesting season of the following bird species should be limited within the sandy prairies and dune and swale systems: bobolink (*Dolichonys oryzivorus*), Henslow's sparrow (*Ammodranus henslowii*), and red headed woodpecker (*Melanerpes erythrocephalus*).

Based on the information above, construction or operation of the Preferred Alternative may have impacts on migratory birds.

Mitigation of the Preferred Alternative

To avoid direct or indirect impacts to migratory birds, habitat disturbance will only be allowed from October 15 – March 15. Disturbance restrictions include no removal of vegetation or potential nesting structures. These disturbance restrictions are in place to avoid unintentionally taking migratory birds, eggs, young, or active nests.

Although the Bald Eagle has a breeding season that spans October 15 to August 31, the project area does not contain a large body of water or large trees that would provide habitat for the Bald Eagle. Therefore, a shorter period for disturbance restrictions is proposed. The breeding season for migratory birds within the PSA is provided in Table 3.1.2 of **Appendix D – Biological Resources**.

4.4 Coastal Resources

No Action Alternative

The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No impacts to coastal resources would be expected under this alternative.

Preferred Alternative
As mentioned in **Section 3.7 Coastal Resources**, GYY falls within the boundaries of the Lake Michigan Coastal Program (LMCP).

In 2004, GYY completed an Environmental Impact Statement (EIS) to evaluate proposed improvements at the Airport. The project area evaluated in the 2004 EIS included the project area for this EA Proposed Action.

As a part of the 2004 EIS, the requirements of the LMCP were cross-referenced with applicable laws and guidance documents of the 2004 EIS environmental categories to ensure that all applicable regulations had been reviewed and considered. The 2004 EIS concluded that the proposed improvements in the project area met all federal, state, and local laws. The 2004 EIS was submitted for review and concurrence to the IDNR, and a consistency determination was issued.

The scale of the project evaluated in the 2004 EIS was much larger than the current air cargo development project, with 2004 environmental impacts far greater than what is expected with the current project. Therefore, impacts to coastal resources are not expected from the construction or operation of the Preferred Alternative.

Mitigation of Preferred Alternative
No mitigation is proposed since no impacts are anticipated under the Preferred Alternative.

4.5 Department of Transportation Act, Section 4(f)

No Action Alternative
The No Action Alternative does not propose the acquisition of property or the construction of any air cargo infrastructure. No impacts to Section 4(f) resources would be expected under this alternative.

Preferred Alternative
The project area is on Airport property and public road ROW. No construction would occur within or near the boundaries of any Section 4(f) resources. The nearest such resource (Joseph L. Block Middle School) is 0.7 miles northwest of the project area (see **Figure 3.5 Section 4(f) Resources** in **Chapter 3.0 Affected Environment**). Neither construction nor operation of the Preferred Alternative will have an impact on any Section 4(f) resources.

Mitigation of the Preferred Alternative
No mitigation is proposed since no impacts to Section 4(f) resources are anticipated under the Preferred Alternative.

4.6 Farmlands

No Action Alternative
The No Action Alternative does not propose any land acquisition or construction of any air cargo infrastructure. No impacts to farmlands are expected under this alternative.

Preferred Alternative

As explained in **Chapter 3.0 Affected Environment**, protected farmland classification maps available from the U.S. Department of Agriculture's Natural Resources Conservation Service show no protected farmlands within the project area. See **Appendix E – Farmland** for the farmland classification map for the project area. Therefore, neither construction nor operation of the Preferred Alternative will have an impact on farmlands.

Mitigation of the Preferred Alternative

The Preferred Alternative would have no impacts on protected farmlands. Therefore, no mitigation is proposed.

4.7 Hazardous Materials, Solid Waste, and Pollution Prevention

No Action Alternative

There would be no construction of an air cargo logistics area or any ground disturbance under the No Action Alternative. Therefore, no hazardous materials, solid waste, or pollution prevention impacts would be expected under this alternative.

Preferred Alternative

The FAA has not established a significance threshold for hazardous waste, solid waste, or pollution prevention. However, the FAA 1050.1G *Desk Reference* offers guidance to consider whether the proposed project could:

- Violate any laws or regulation regarding hazardous waste.
- Involve a contaminated site, or if actions within a contaminated site are appropriately mitigated.
- Produce an appreciable amount of hazardous waste.
- Generate a different quantity or type of solid waste that could exceed local capacity or use different methods of collection and disposal.

Resource Conservation and Recovery Act Sites

According to the U.S. Environmental Protection Agency's (EPA) *NEPAssist* tool, two Resource Conservation and Recovery Act (RCRA) facilities are in the project area. Maps of these facilities are provided in **Appendix F – Hazardous Materials**.

The NEPAssist tool lists Solar Environmental, Inc. at 6980 Chicago Avenue as one of these RCRA facilities. The EPA's Enforcement and Compliance History Online (ECHO) Detailed Facility Report shows the date of last compliance monitoring for this site as June 8, 2007, and the compliance status as "No Violation Identified." The report also shows the facility status as "Inactive."

NEPAssist lists the City of Gary at 7360 W Chicago Avenue as the other RCRA facility in the project area. The EPA's ECHO Detailed Facility Report shows the date of last compliance monitoring for this facility as November 30, 2006, and the compliance status as "No Violation Identified." In addition, the facility status is listed as "Inactive" in the report.

The ECHO Detailed Facility Reports for the RCRA facilities are provided in **Appendix F – Hazardous Materials**.

Brownfield Sites

The Indiana Department of Environmental Management's (IDEM) Interactive Map application identifies one active brownfield site over a portion of the project area and another outside of the project area. See **Appendix F – Hazardous Materials** for a map showing the locations of these sites.

The first brownfield site is listed as NBD Bank Trust – Zaleski Properties in IDEM's Interactive Map. Documentation regarding this site within IDEM's Virtual File Cabinet, which is accessible through the Interactive Map application, includes June 26, 2015, correspondence from the IDEM to the FAA (see **Appendix F – Hazardous Materials**). This correspondence provides background information on the site as well as a description of the site environmental conditions. This correspondence also includes a June 24, 2015, Comfort Letter from the EPA referencing the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§ 9601 et seq., to address liability concerns related to existing contamination on the site. This Comfort Letter, which is addressed to the FAA, outlines the reasonable steps the EPA recommends an owner of the property to undertake to prevent or limit human, environmental, and/or natural resource exposure to previously released hazardous substances and/or petroleum found at the site.

The majority of proposed construction activity within and near this brownfield site involves basic surface paving with no deep excavation. In addition, a large portion of the grade over the contaminated parcels in this area have been previously raised approximately seven feet. Therefore, the construction action is not expected to penetrate deep enough to result in hazardous materials impacts.

The second active brownfield site located outside the project area is associated with Refax (6200 Industrial Highway) found across Industrial Highway from the easternmost portion of the project area. According to the Virtual File Cabinet within the Interactive Map application, a December 2018 Request Form for an EPA Brownfield Cleanup Grant shows the owner of the subject property as the Gary Redevelopment Commission. This Request Form is provided in **Appendix F – Hazardous Materials**. The Gary Redevelopment Commission applied for grant funding to perform assessment and cleanup at the site that historically operated under private industrial firms involved in raw materials and cement production. This activity ceased at the site in the early 2000s. The Request Form states that the City of Gary and a private corporation were in discussions at the time to redevelop the site as a facility that would generate bioenergy from municipal waste. This bioenergy facility would be constructed following brownfield cleanup.

Additional information regarding this brownfield site within the Virtual File Cabinet focuses on the development of the bioenergy facility by Fulcrum Centerpoint LLC. The most recent correspondence regarding this proposed facility is dated July 17, 2024, in which the IDEM's Office of Air Quality notified Fulcrum Centerpoint LLC that it was revoking a permit for construction approval due to no construction activities commencing at the site within 18 months of issuance of the permit. The July 17, 2024, IDEM correspondence is provided in **Appendix F – Hazardous Materials**.

Based on documentation within the Virtual File Cabinet showing plans for the Fulcrum Centerpoint LLC bioenergy facility proceeding since the December 2018 Request Form for an EPA Brownfield Cleanup Grant, it is assumed that cleanup of the Refax brownfield site was completed.

LUST Sites

IDEM's Interactive Map also shows three medium priority leaking underground storage tanks (LUSTs) in the project area. See **Appendix F – Hazardous Materials** for a map showing the locations of these sites.

The LUSTs within the project area are associated with PGT Trucking Incorporated (7212 Chicago Avenue), Riechmann Enterprises Incorporated (7200 Chicago Avenue), and PI & I Motor Express (7000 Chicago Avenue). The status of these LUSTs was reviewed in IDEM's Virtual File Cabinet with findings discussed below.

PGT Trucking Incorporated (7212 Chicago Avenue)

Correspondence addressed from IDEM to PGT Trucking on October 20, 2009, stated the conclusion that, based on technical reports reviewed by IDEM and current use of the site and surrounding properties, no further response actions were required. IDEM issued a No Further Action (NFA) determination regarding this LUST. The IDEM correspondence is provided in **Appendix F – Hazardous Materials**.

Riechmann Enterprises Incorporated (7200 Chicago Avenue)

Correspondence addressed from IDEM to Riechmann Enterprises on July 5, 2023, requested information from Riechmann Enterprises pertaining to a release of petroleum from an underground storage tank at Riechmann Transport Inc., 7200 Chicago Avenue. In its correspondence, IDEM explained that it reviewed the following documents pertaining to the release:

- Violation letter – IDEM, Dated June 23, 2009 (VFC#49339563)
- Site Activity Update – IDEM, Dated July 1, 2005 (VFC#23575786)

IDEM informed Riechmann Enterprises that, as owner/operator of the LUST, it was responsible for submitting information to IDEM related to release reports, investigations, and corrective actions planned or taken. IDEM also informed Riechmann Enterprises that it must assemble information regarding the nature and extent of contamination. All remediation performed should be submitted for review in order for IDEM to assess current site conditions. The IDEM July 5, 2023, correspondence is provided in **Appendix F – Hazardous Materials**. No additional correspondence regarding this issue is available in the Virtual File Cabinet.

PI & I Motor Express (7000 Chicago Avenue)

Correspondence addressed from IDEM to the Airport on September 10, 2014, regarding the Airport's NFA request for the former PI & I Motor Express facility located at 7000 Chicago Avenue stated the conclusion that, based on technical reports reviewed by IDEM and additional lines of

evidence, no further response actions were required. IDEM issued an NFA determination regarding this LUST. The IDEM correspondence is provided in **Appendix F – Hazardous Materials**.

Environmental Restrictive Covenants

Finally, as noted in **Chapter 3.0 Affected Environment**, IDEM's Interactive Map shows two sites with environmental restrictive covenants (ERC) adjacent to but outside the project area. Immediately east of the southern portion of the project area is a restricted site with an ERC associated with Pure Platinum LLC (6633 W Industrial Highway). As explained in **Section 3.10 Hazardous Materials, Solid Waste, and Pollution Prevention** in **Chapter 3.0 Affected Environment**, an ERC is a type of institutional control used to apply land use restrictions to properties. According to correspondence in the Virtual File Cabinet within the IDEM Interactive Map application, this property was previously the site of a facility operated by Luria Brothers that used a rotary kiln to de-oil mill scale from Bethlehem Steel from 1978 to 1981.

On January 12, 2017, IDEM addressed correspondence to Connell Limited Partnership, which owned the property prior to transfer to Pure Platinum LLC in 2022, regarding a Notice of Corrective Action Complete with Controls (see **Appendix F – Hazardous Materials**). The correspondence stated that IDEM issued a public notice for a RCRA Corrective Action Program Statement of Basis for Luria Brothers on November 29, 2016, and no public comments were received. The correspondence further explained that the letter served as IDEM's Final Decision that Luria Brothers had fulfilled its obligations under Indiana's RCRA Corrective Action Program and was issued a Notice of Corrective Action Complete with Controls. An ERC has been placed on the property deed to limit site use to commercial/industrial purposes.

Another ERC site located directly southeast of the project area is listed by IDEM as the Conservation Chemical Company. Documentation regarding this site within IDEM's Virtual File Cabinet includes a February 29, 2008, Comfort Letter addressed from IDEM to the Gary/Chicago International Airport Authority (GCIAA) (see **Appendix F – Hazardous Materials**). This letter provides background information on the site, including past uses and owners, an environmental assessment, remediation, removal history, and a description of the site environmental conditions. This correspondence also includes IDEM's conclusions regarding GCIAA's liability pertaining to redevelopment of the site including GCIAA actions required by IDEM to make the site safe for redevelopment and requirements for institutional controls to be placed over the site.

Historical operations at the Conservation Chemical Company site impacted soil, ground water, and surface water on the site. The soil was impacted by acids, polychlorinated biphenyls (PCBs), chemical spills associated with ferric chloride manufacturing activities, and leakage or spills from tanks and drums storing hazardous material or waste oils from refinery operations. Ground water was impacted by hazardous acid compounds, base neutral compounds, volatile organic compounds (VOCs), solvents, metals, PCBs, and petroleum constituents, while off site ground water was impacted by chlorinated organics, cyanide, phenols, and heavy metals. Additionally, surface water and surface sediment contain high chemical concentrations of metals and VOCs.

Several remedial actions have been completed on the site since 1987. One of these actions was the installation and operation of an oil recovery remediation system that pumped and treated free-phase

petroleum product, caustic solids, waste oils, ferric chloride, chlorinated hydrocarbons, and hazardous sludge from the ground water aquifer. The EPA installed the system in 2003 but ceased operations and decommissioned the system in 2007 due to budgetary issues.

Immediately east of the northern portion of the project area is a site associated with Luria Bros & Co Inc. (6633 W Industrial Highway) where hazardous waste corrective action has been completed. Upon review of information in the Virtual File Cabinet within the Interactive Map application, it was determined that information for this site is the same as the Pure Platinum LLC (6633 W Industrial Highway) site discussed above.

These two ERC locations are outside the project area and will not be impacted. The locations of these ERCs in relation to the project area can be found in **Figure 4.0 Existing ERCs in the Project Vicinity.**

Conclusion

Based on the information presented above, it is concluded that construction or operation of the Preferred Alternative may have hazardous materials, solid waste, and pollution prevention impacts. These impacts would be associated with the NBD Bank Trust – Zaleski Properties site and the Riechmann Enterprises Incorporated LUST at 7200 Chicago Avenue.

In addition, construction activities associated with the Preferred Alternative have the potential to create solid waste material (e.g., excavated soil, gravel, and concrete).

Mitigation of the Preferred Alternative

Mitigation for the NBD Bank Trust – Zaleski Properties site and the Riechmann Enterprises Incorporated LUST at 7200 Chicago Avenue will include coordination with IDEM prior to any ground disturbing activities to further define the status of the sites.

Mitigation will require that the steps outlined in the EPA's June 24, 2015, Comfort Letter for the Zaleski Properties (found in **Appendix F – Hazardous Materials**) be followed to prevent or limit human, environmental, and/or natural resource exposure to previously released hazardous substances and/or petroleum found at the site. The Comfort Letter included the following mitigation steps:

- Avoid any activities that may result in the exposure of individuals and ecosystems to the contaminated soils and groundwater, including the installation or use of any drinking wells or any residential use of the property.
- Refrain from any activities that would involve the penetration of the water table.
- Refrain from interfering with any future inspection or investigation activities at the property as conducted by EPA and IDEM.
- Coordinate with EPA and IDEM to promptly complete and record a restrictive covenant under Indiana Code 13-11-2-193.5 to implement the use restrictions described above and to ensure ongoing access to EPA and IDEM to monitor conditions and conduct necessary actions at the site.

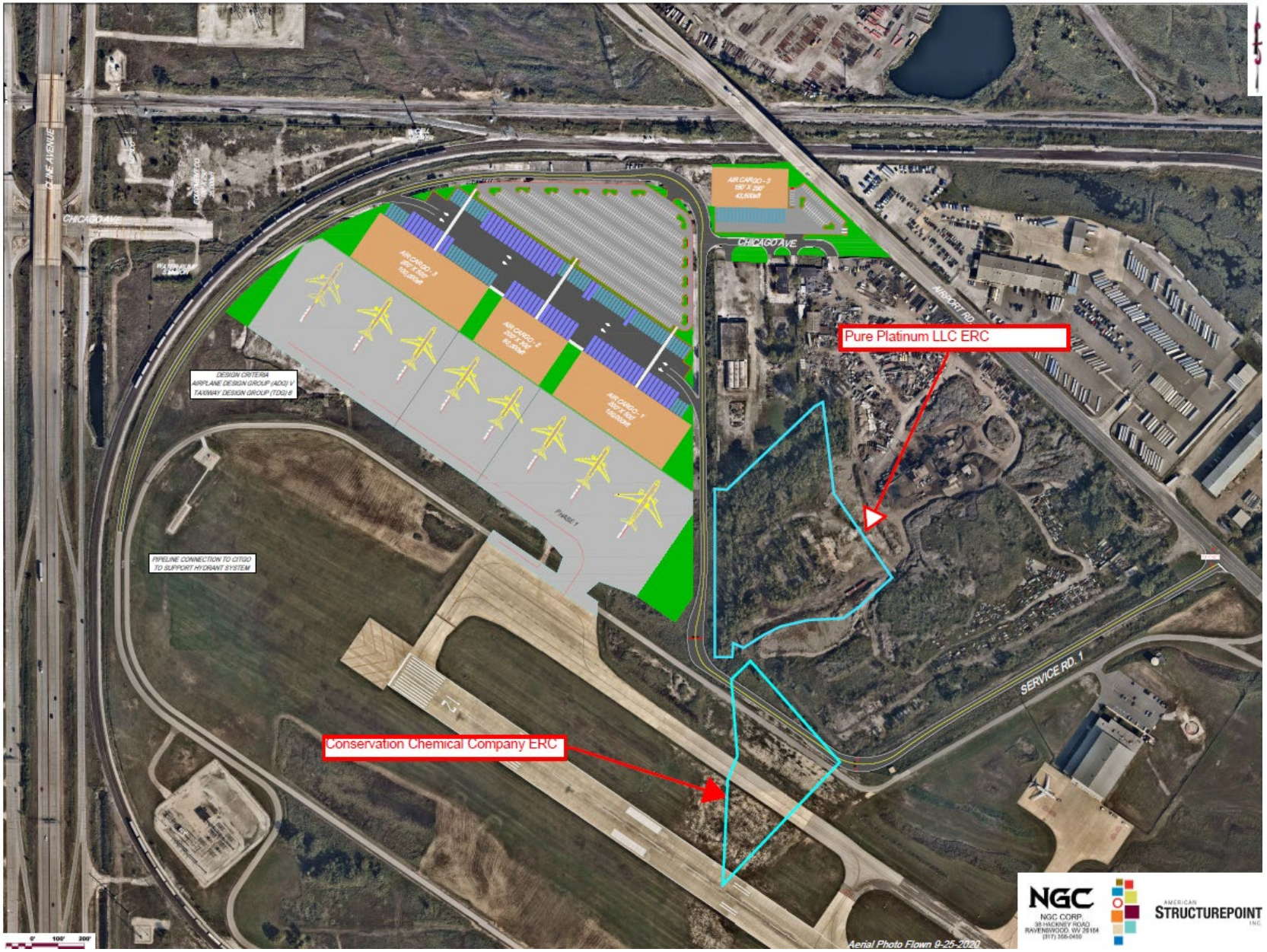
For the LUST at the Riechmann Enterprises Incorporated site, the extent of contamination is unknown. However, since the conclusion of the IDEM coordination, the Airport has acquired the property and is responsible for any future cleanup. Remedial actions to date include the installation of a vertical oil underground seepage wall to limit any contamination from migrating offsite. In addition, a parking lot is proposed in this area thus effectively capping the area and preventing any additional disturbance. No significant impacts are expected.

Prior to construction, it is recommended that soils be sampled near both sites and a soils management plan be developed and implemented during construction of the Preferred Alternative, as necessary. The soils management plan used during construction should include the following:

- A provision for an on-site monitor to evaluate excavated soils and determine if they have been impacted by historical releases.
- A procedure for determination of a disposal location, and procedures for sampling of potentially impacted soils.
- If impacted soils are encountered (i.e., odors, staining) during construction activities, soil samples should be collected and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum compounds (TPH) and RCRA listed metals (RCRA Metals) prior to offsite disposal and/or on-site relocation.
- Off-site transport and disposal of soils must be coordinated to ensure compliance with applicable state and federal regulations.
- If no contamination is observed during construction activities, and it is anticipated that all soil will remain on Airport property, these soils may be relocated without being sampled for the chemicals of concern. However, if at any time these soils must be sent off-site, soils must be analyzed for VOCs, SVOCs, TPH and RCRA Metals to identify appropriate disposal methods.

Lastly, the contractor will be required to have a Spill Prevention, Control, and Countermeasure (SPCC) plan in place to be implemented if a spill occurs during construction operations. An approved erosion control plan is also required to provide a collection area for non-recyclable waste. Any waste generated through proposed project improvements will be disposed of in compliance with all federal, state, and local regulations.

Figure 4.0 Existing ERCs in the Project Vicinity



Source: NGC Corp., 2025

4.8 Historical, Architectural, Archeological, and Cultural Resources

No Action Alternative

The No Action Alternative assumes there would be no construction of any air cargo infrastructure or any ground disturbance. No impacts to historical, architectural, archeological, or cultural resources would be anticipated under this alternative.

Preferred Alternative

As explained in **Chapter 3.0 Affected Environment**, the archeological reconnaissance survey report and the architectural inventory survey report conducted for the project area in October 2022 concluded that construction of the Preferred Alternative would not affect any properties eligible for or listed on the National Register of Historic Places (NRHP).

These findings were submitted to the Indiana State Historic Preservation Office (Indiana SHPO) for review and concurrence. The Indiana SHPO agreed with the findings and provided a letter of concurrence dated May 8, 2024 (found in **Appendix G – Historical and Cultural Resources**). In this letter the Indiana SHPO stated that, based upon the documentation available to its staff, no historic buildings, structures, districts, or objects listed in or eligible for inclusion in the NRHP have been identified within the probable area of potential effects. In addition, the letter stated that, in terms of archeology, no currently known archeological resources eligible for inclusion in the NRHP have been recorded within the proposed project area, and no further archeological investigations appear necessary.

Historical, architectural, archeological, and cultural resources impacts are not expected from the construction or operation of the Preferred Alternative.

Mitigation of the Preferred Alternative

The Preferred Alternative is not expected to have impacts on historical, architectural, archeological, or cultural resources. However, the Indiana SHPO directed if any prehistoric or historic archeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, the discovery must be reported to the Indiana SHPO within two business days.

4.9 Land Use

No Action Alternative

There would be no construction activities under this alternative, and the Airport would remain in its current state, with no action being taken to develop the infrastructure or facilities to support dedicated air cargo carrier operations at the Airport. Therefore, there would be no land use impacts under the No Action Alternative.

Preferred Alternative

The FAA has not established a significance threshold for land use, or factors to consider when determining significance of a project's effect on land use; however, to determine the potential for land use impacts

caused by the Preferred Alternative, an evaluation of the Proposed Action and its compatibility with local land use controls and plans was completed.

No land use classification changes would occur with the Preferred Alternative. No noise sensitive areas (residential, educational, health, religious, park or recreational, wildlife refuges, or cultural and historical) will be introduced or impacted. In compliance with 49 U.S.C. § 47017 (a)(10), the Airport has been proactive in restricting incompatible land uses adjacent to and within the immediate vicinity of GYY when feasible. Construction of the air cargo logistics area will occur on existing Airport property and public road ROW. Existing land use patterns will remain unchanged. The Preferred Alternative is considered compatible with the existing land uses of the surrounding area, as shown on the existing land use map for the City of Gary in **Figure 3.6 City of Gary Existing Land Use Map** in **Chapter 3.0 Affected Environment**.

The proposed action will not increase wildlife attractants or introduce new wildlife that are hazardous to aircraft operations. In addition, the Preferred Alternative is not expected to increase congestion or cause degradation of the level of service. See **Figure 2.2 Site Layout Plan** in **Chapter 2.0 Alternatives Considered** for a diagram of the site layout for the proposed project.

Based on the above information, it is determined that the Preferred Alternative is compatible with existing and planned land uses and zoning requirements. Land use impacts associated with the Proposed Action will not be significant based upon the factors described above.

Mitigation of the Preferred Alternative

Traffic from construction vehicles would be managed to avoid and minimize any impacts on local roads by defining haul routes and by scheduling the arrival and departure times of construction traffic so that normal traffic patterns are not interrupted. Any potential construction impacts to surface transportation would be temporary in nature.

4.10 Natural Resources and Energy Supply

No Action Alternative

The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No impacts to natural resources and energy supply would occur under the No Action Alternative.

Preferred Alternative

The proposed project would slightly increase the use of natural resources and energy supplies during construction. Construction of the air cargo logistics area would result in temporary increases in energy demand and would require the use of construction materials (e.g., aggregate, concrete, asphalt, fuel oil, gasoline, wire, glass, and paint). Additionally, trucks and construction equipment such as cranes and excavators would consume fuels as needed for construction purposes.

The new air cargo logistics area would be designed and constructed to include sustainability features to reduce energy consumption during operation. These features may include use of energy efficient fixtures, point-of-use water heaters, efficient/upgraded insulation and LED lighting, and efficient HVAC systems.

Natural resources and energy supply impacts are not expected from the construction or operation of the Preferred Alternative.

Mitigation of the Preferred Alternative
BMPs to reduce energy consumption during construction will be employed, where applicable. To reduce energy consumption associated with the temporary use of cranes, excavators, and vehicles for the Preferred Alternative, construction equipment should be in good working order to ensure the most efficient use of fuel. All vehicles and equipment should be checked for leaks and repaired immediately.

4.11 Noise and Noise Compatible Land Use

No Action Alternative
The No Action Alternative would result in no construction activities, and the Airport would remain in its current state, with no action being taken to develop the infrastructure or facilities to support dedicated cargo carrier operations at the Airport. Therefore, no noise and noise compatible land use impacts would be expected under the No Action Alternative.

Preferred Alternative
Per FAA Order 1050.1G – *Environmental Impacts: Policies and Procedures*, and the *FAA Environmental Desk Reference for Airport Actions*, any airport that exceeds 90,000 annual piston-powered aircraft operations or 700 annual jet-powered aircraft operations, 10 or more daily helicopter operations, or any project that includes the construction of a new airport, a runway relocation, runway strengthening, or a major runway expansion requires a noise analysis. A noise analysis is performed for actions that result in a general overall increase in daily aircraft operations or the use of larger/noisier aircraft. The FAA's noise analysis primarily focuses on how proposed airport actions would change the noise exposure of individuals to aircraft noise in areas surrounding the airport.

According to the FAA's Traffic Flow Management System Counts (TFMSC) database, Instrument Flight Rules (IFR) jet operations at GYY totaled 8,036 in 2023, which exceeds the threshold of 700 annual jet operations (see **Appendix J – Noise**).

The TFMSC database also shows there were 1,975 total IFR piston operations at the Airport in 2023 (see **Appendix J – Noise**). In addition, the FAA's OPSNET database shows there were 24,666 total aircraft operations at GYY in 2023 (see **Appendix J – Noise**). Based on the TFMSC and OPSNET data, piston-powered aircraft activity levels do not exceed the threshold of 90,000 annual operations.

GYY's FAA Form 5010-1, Airport Master Record indicates there are three based helicopters at the Airport, which means it is possible the threshold of 10 daily helicopter operations for a noise analysis is exceeded (see **Appendix J – Noise**).

Although the activity levels by jet aircraft and helicopters either exceed or may exceed the stated threshold for a noise analysis, a noise analysis was not completed because the project does not involve the construction of a new airport, a runway relocation, runway strengthening, or a major runway expansion. As

previously stated, the Proposed Action is needed to accommodate existing air cargo needs, not support an increase in air cargo operations. Also, according to the FAA-approved 2022 Master Plan Update, development of air cargo infrastructure at GYY is not anticipated to generate aircraft noise impacts. Table 7-1: Summary of Environmental Analysis from the 2022 Master Plan Update is provided in **Appendix J – Noise**. This table summarizes the projects in the 2022 Master Plan Update's Proposed Development Plan that are anticipated to have impacts in given environmental categories.

A temporary increase in noise may occur during construction activities due to operations of heavy equipment and construction vehicles.

Based on the information presented above, increased aircraft noise impacts are not expected from the operation of the Preferred Alternative. Noise from equipment and vehicles during construction activities is expected, but these impacts will be temporary.

Mitigation of the Preferred Alternative
As explained above, aircraft noise impacts are not expected from the construction or operation of the Preferred Alternative. Therefore, no mitigation of aircraft noise impacts is proposed.

Due to temporary noise impacts from heavy equipment and construction vehicles during construction activities, construction staging areas are not allowed near noise sensitive land uses.

4.12 Socioeconomics and Children's Environmental Health and Safety Risks

4.12.1 Socioeconomic Impacts

No Action Alternative
The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No socioeconomic impacts would be expected under this alternative.

Preferred Alternative
No residential, business, or farm relocations will be required as part of the proposed project. Construction will occur on existing Airport property and public road ROW. No disruptions of orderly, planned development are expected. Minimal community disruptions, including impacts to surface transportation patterns, are expected during construction, but Airport operations would return to normal, and any disruptions to the community would be eliminated.

Mitigation of the Preferred Alternative
Since no socioeconomic impacts are anticipated, no mitigation is proposed.

4.12.2 Children's Environmental Health and Safety Risks

No Action Alternative
The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No impacts to children's environmental health and safety would occur under this alternative.

Preferred Alternative

In most cases, the significance of impacts to children's environmental health and safety is dependent on the significance of impacts in other environmental categories. Impacts from the proposed action to other resource categories are not considered significant. Areas affected by the Preferred Alternative do not include schools or other facilities that would otherwise be primarily accessed by children. Under the Preferred Alternative, there are no significant impacts to air quality or noise that may influence the health of the surrounding population, including children.

In addition, construction under the proposed action would occur on Airport property and public road ROW, and access to the site would be restricted. It is unlikely that the development of the Preferred Alternative will include products or substances a child is likely to encounter. Therefore, no disproportionate health or safety risks to children are expected.

Impacts to children's environmental health and safety from the construction or operation of the Preferred Alternative are not anticipated.

Mitigation of the Preferred Alternative

Since no impacts to children's environmental health and safety are anticipated, no mitigation is proposed.

4.13 Visual Effects (including Light Emissions)

No Action Alternative

The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No impacts associated with visual effects or light emissions would occur under this alternative.

Preferred Alternative

The proposed air cargo logistics area would require new lighting for apron areas, taxiway connectors, cargo buildings, and truck and auto parking areas, but this lighting would be similar in scale and function to the existing lighting at the Airport. The nearest light-sensitive resource is a residential area located approximately 0.5 miles northwest of the project area. Located between the project area and this residential area is State Road 912 (Cline Avenue), a freeway that varies from four to six lanes with an annual average daily traffic volume ranging from approximately 18,300 to 27,700 vehicles, according to data from the Indiana Department of Transportation (INDOT).

Adjacent land uses north, east, and south of the project area are classified as light manufacturing and heavy industrial, while adjacent land use to the west, in addition to the aforementioned residential area, is classified as industrial, office/research, and vacant land.

Due to the location of the project area, construction of the air cargo logistics area is not anticipated to affect, obstruct, substantially alter, or remove visual resources that are visually important or have unique characteristics.

Visual effects (including light emissions) from the construction or operation of the Preferred Alternative are not anticipated.

Mitigation of the Preferred Alternative
No mitigation is proposed since no visual effects from the construction or operation of the Preferred Alternative are anticipated.

4.14 Water Resources

4.14.1 Wetlands

No Action Alternative
The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No impacts to wetlands would be expected under this alternative.

Preferred Alternative
Of the 13.67 acres delineated within the two PSAs, it is anticipated that up to 1.31 acres of jurisdictional wetlands will be impacted by implementation of the Preferred Alternative (as shown in **Table 4-1 Impacted Wetlands**).

For a description of delineated wetlands in the two PSAs including types and functions, see **Section 3.17.1 Wetlands** in **Chapter 3.0 Affected Environment**. The full Stantec and Soil Solutions, Inc (SSI) wetland delineation reports are provided in **Appendix H – Wetlands.**

Mitigation of the Preferred Alternative
Early coordination with the U.S. Army Corps of Engineers (USACE) and IDNR indicate Wetlands SSI 7 (1.19 acres of emergent), and SSI 8 (0.12 acres of emergent) are jurisdictional. Based on the conclusions of both wetland delineation reports, and coordination with the USFWS and IDNR, 1.31 acres of emergent wetlands are expected to be impacted by the project (**Table 4-2 Impacted Wetlands**). Because wetlands in the project area will be graded and filled, mitigation is required to offset wetland impacts. See **Appendix H Wetlands** for the IDNR Water of the State Determination.

For impacts to jurisdictional wetlands, the Airport must go through the 404/401 permitting processes with the USACE and a State Regulated Wetland permit must be obtained from IDNR prior to impacting the wetlands.

Verbal confirmation from the USFWS indicates that only Wetland SSI 7 and SSI 8 are regulated; however, an official Jurisdictional Determination from the USFWS has not been received. Any required coordination with the USFWS will be completed as a first step in the permitting process. Proposed mitigation for wetland impacts will be the purchase of wetland credit through in-lieu fee (ILF) program. An ILF program sells “advance credits” to permittees who purchase these credits in lieu of performing mitigation themselves. The legal obligation to provide compensatory mitigation is then transferred to the sponsor of the in-lieu fee program (IDNR) upon receipt of funds for sales of wetland credits.

In general, USFWS and IDNR require impacted wetlands be replaced with wetlands of the same type. For emergent wetland impacts the ratio is 2:1. Alternative mitigation ratios may be permitted for isolated wetlands, but coordination with USFWS and IDNR to determine mitigation ratios is required as part of the permitting process. The ratios used will be contingent upon the "quality" of the wetlands. Generally, higher value wetlands will require a higher ratio. USACE also considers the type of mitigation (restoration, enhancement, or preservation) when determining the required mitigation ratio. The project specific ratio will be determined by the USACE and IDNR during the permitting process.

During final design of the Preferred Alternative, wetland impacts will be avoided and minimized as much as practicable. All delineated wetlands will be shown on construction plans and flagged in the field to protect them from any possible direct or indirect impacts. Construction documents will also include avoidance and erosion control measures.

Table 4-2
Impacted Wetlands

Wetland	Type	Total Area (Acres)	Regulatory Status
SSI 7	Emergent	1.19	Jurisdictional
SSI 8	Emergent	0.12	Jurisdictional
Total		**1.31**	

Note: Due to the two wetland delineations having some shared delineated wetland boundaries, only unique individual wetlands were calculated. Overlapping wetlands were only counted once.
Source: *Regulated Waters Delineation Report, NGC: Gary Airport North Wetland Delineation*, February 15, 2023, prepared by Stantec; *Wetland Delineation Report GCI Airport Northwest*, October 24, 2024, prepared by Soil Solutions, Inc.

4.14.2 Floodplains

No Action Alternative
The No Action Alternative assumes there would be no construction of any air cargo infrastructure. Therefore, no impacts to floodplains would be expected under this alternative.

Preferred Alternative
Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) were reviewed for the project area to evaluate potential floodplain impacts. The FIRMs show there are no regulated floodplains in the project area. The FIRMs are presented in **Figure 3.12 Floodplain Map 1** and **Figure 3.13 Floodplain Map 2** in **Chapter 3.0 Affected Environment**.

The Preferred Alternative is not expected to have any adverse floodplain impacts.

Mitigation of the Preferred Alternative
No mitigation is proposed since no adverse floodplain impacts from the construction or operation of the Preferred Alternative are anticipated.

4.14.3 Surface Water

No Action Alternative

The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No impacts to surface water would be expected under this alternative.

Preferred Alternative

According to the EPA's NEPAssist tool, there are no surface water resources located within the boundaries of the project area. However, as explained in **Section 3.17.3 Surface Water** in **Chapter 3.0 Affected Environment**, the wetland delineation report identified a man-made water retention ditch with constructed banks made of shingling material that runs in an east-west direction inside the northern portion of the project area. The report concluded that impacts to this feature would likely not fall under the jurisdiction of USACE or IDEM.

Mitigation of the Preferred Alternative

Soil erosion is a source of concern due to possible adverse impacts to surface waters from construction projects. Since the Airport site is generally flat, there is not expected to be a high risk of soil erosion during excavation and other ground disturbing activities. Any erosion that occurs during construction will be minimized using appropriate BMPs. The following list of BMPs represents erosion control measures to protect water resources in the vicinity of the project area. BMPs that should be considered during construction and applied where applicable include:

- Sediment traps.
- Temporary cement ponds.
- Temporary grassing of disturbed areas.
- Vegetation cover replaced as soon as possible.
- Erosion mats and mulch.
- Silt fencing and drainage check dams.
- Settling basins for storm water treatment.

All excavated soils and staging areas for construction equipment will be placed in non-sensitive upland areas with disturbed areas replanted as soon as possible to reduce the likelihood of erosion. Mitigation measures prepared under an erosion control plan, in accordance with FAA AC 150/5370-10H, *Standard Specifications for Construction of Airports*, will help minimize long-term impacts to area water quality and to the existing drainage system.

The IDEM administers construction stormwater permitting coverage under the Construction Stormwater General Permit (CSGP). The CSGP is a performance-based regulation designed to reduce pollutants, principally sediment, which are a result of construction and other land-disturbing activities. The requirements of the CSGP apply to all people who are involved in construction activity (which includes clearing, grading, excavation, and other land-disturbing activities) that results in the disturbance of one acre or more of total land area. Since the Preferred Alternative involves construction activity on more than one acre of land, permit coverage under the CSGP would be required.

To obtain permit coverage under the CSGP, applicants must file an online application or a Notice of Intent (NOI). The purpose of the NOI is for the applicant or project site owner to notify the IDEM of his or her intent to operate their proposed construction project in a manner consistent with the CSGP. The applicant must follow all guidelines and requirements of the CSGP, which includes the submittal of a Construction/Stormwater Pollution Prevention Plan (SWPPP) along with the NOI.

The Construction Plan is divided into several parts that include basic resource information, an existing project site layout, a grading plan, a drainage plan, and the SWPPP. The SWPPP is an integral part of the Construction Plan and addresses several issues. First, the SWPPP outlines how erosion and sedimentation will be controlled on the project site to minimize the discharge of sediment off-site or to a Water of the State. Second, the plan addresses other pollutants that may be associated with construction activity. This may include disposal of building materials, management of fueling operations, etc. Finally, the plan should also address pollutants that will be associated with the post-construction land use.

4.14.4 Ground Water

No Action Alternative
The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No impacts to ground water would be expected under this alternative.

Preferred Alternative
The proposed construction of the Preferred Alternative will increase impervious surfaces and likely increase storm water runoff. As explained in **Chapter 1.0 Purpose and Need**, the proposed development encompasses an approximate 50-acre area. As such, new impervious surfaces are estimated to be 50 acres (2,178,000 square feet) using a conservative estimate of a full build scenario. The proposed action will decrease ground water infiltration within the project area due to the additional impervious surfaces; however, this is not expected to tangibly impact ground water recharge rates or impact public water supply.

As explained in **Section 3.17.4 Ground Water** in **Chapter 3.0 Affected Environment**, the project area is not within an EPA-designated Sole Source Aquifer for Drinking Water or a wellhead protection area. In addition, there are no drinking water wells within the project area.

Based on the information presented above, no significant ground water impacts are anticipated from the construction or operation of the Preferred Alternative.

Mitigation of the Preferred Alternative
To protect surface and ground water resources, runoff will be directed into the Airport's existing stormwater management system. Stormwater runoff will drain into the Airport's existing drainage system in accordance with its SWPPP. The SWPPP will also be updated to include BMPs to reduce erosion and discharge of pollutants from construction activities.

4.14.5 Wild and Scenic Rivers

No Action Alternative
The No Action Alternative assumes there would be no construction of any air cargo infrastructure. No impacts to Wild and Scenic Rivers or Nationwide Rivers Inventory (NRI) rivers would occur under the No Action Alternative.

Preferred Alternative
According to the National Wild and Scenic Rivers System and National Park Service, there are no rivers in the National Wild and Scenic Rivers System or listed on the NRI in the project area or in the vicinity.

Impacts to Wild and Scenic Rivers and NRI resources are not anticipated with the construction or operation of the Preferred Alternative.

Mitigation of the Preferred Alternative
No mitigation is proposed since no impacts to Wild and Scenic Rivers or NRI rivers are anticipated.

4.15 Other Project Considerations

This section discusses other items that, while not specifically covered in previous sections, are important to the understanding of the project's potential impacts on the social, environmental, and economic surroundings.

Conformance with Plans, Policies, and Controls: An airport development project plays an important role in the local and regional economy. Often, a project influences the type and location of specific land uses, the ground transportation network, and the general direction of community growth. When evaluating an action's conformance with plans and policies, there are usually two levels of planning involved. The first level addresses policy plans, which are goals and objectives for the area or jurisdiction. The second addresses specific physical plans that direct development of the physical infrastructure.

Consultation with the Airport does not indicate any conflicts with local, county, or state planning efforts. The City of Gary, the City of East Chicago, Calumet Township, and Lake County are in full support of the proposed project.

In addition, reservation of the far northwest corner of the Airport for future air cargo infrastructure is shown on the Future Airport Layout Plan sheet within the Airport's Airport Layout Plan (ALP). The Airport's ALP can be found in **Appendix B – Airport Layout Plan**.

GYY is also included in the FAA's *National Plan of Integrated Airport Systems* (NPIAS). This designation is indicative of its significance in the national air transportation system.

The proposed project aligns with local and regional plans, and no impacts are expected.

Conformance with Laws and Administrative Rules: In preparing this EA, various federal, state, regional, and local agencies were contacted to solicit their comments on the proposed project as it related to their specific area of expertise or regulatory jurisdiction including permitting and mitigation requirements (**Appendix C – Early Agency Coordination**). Based on this coordination, inconsistency with known federal, state, or local laws or administrative rules is not expected. All phases of the proposed action will adhere to appropriate regulations and permitting requirements including any necessary mitigation measures.

Means to Avoid, Minimize, and Mitigate Adverse Environmental Impacts: Projects should take care to avoid permanent adverse impacts on the environment. It is important that all adverse environmental impacts be minimized or mitigated if avoidance is not possible. The various impacts of the Preferred Alternative and the potential means to avoid, minimize, and mitigate them to the greatest extent possible are summarized in **Table 4-3 Mitigation Summary of the Preferred Alternative**.

Degree of Controversy on Environmental Grounds: The Preferred Alternative is consistent with all federal, state, regional, and local plans and laws. According to conversations and correspondence with various federal and state agencies and the Airport, there have been no negative public comments or controversy concerning the proposed action.

Table 4-3
Mitigation Summary of the Preferred Alternative

Environmental Factor	Proposed Mitigation and Permits
Air Quality	To minimize air emissions from construction equipment the following recommendations may be implemented and incorporated by the Airport during construction, where feasible: • Use low-sulfur diesel fuel (less than 0.05 percent sulfur). • Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site. • Position the exhaust pipe so that the diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed. • Use catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels. • Use climate-controlled cabs that are pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operator's exposure to diesel fumes. • Regularly maintain diesel engines, which is essential to keeping exhaust emissions low, and follow the manufacturer's recommended maintenance schedule. • Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training

Table 4-3 Mitigation Summary of the Preferred Alternative	
Environmental Factor	**Proposed Mitigation and Permits**
	diesel operators to perform routine inspections, and maintaining filtration devices. • Purchase new vehicles that are equipped with the most advanced emission control systems available. • With older vehicles, use electric starting aids as block heaters to warm the engine to reduce diesel emissions.
Biological Resources	Prior to construction further coordination with IDNR is warranted to include state ETR species-specific presence/absence surveys and take permits. Per IDNR, the use of best management practices (BMPs) for soil erosion and runoff should be utilized during project activities to minimize direct and indirect impacts to any ETR habitat. Proper dust control measures should be implemented. IDNR also requested that any project materials or equipment used adjacent to or within the PSA be cleaned per BMPs to help prevent the spread of invasive or noxious plant species. To protect ETR vascular plant species within or adjacent to the expected ground disturbing activities, surveys should be conducted by qualified personnel for the species prior to construction. If species are identified the area should be flagged and taped off to lessen the possibility of impact to the ETR species. To avoid direct or indirect impacts to migratory birds, habitat disturbance will only be allowed from October 15 – March 15. Disturbance restrictions include no removal of vegetation or potential nesting structures. These disturbance restrictions are in place to avoid unintentionally taking migratory birds, eggs, young, or active nests.
Coastal Resources	None Required.
Dept. of Transportation Act, Section 4(f)	None Required.
Farmlands	None Required.
Hazardous Materials	Mitigation for the NBD Bank Trust – Zaleski Properties site will also require that the steps outlined in the EPA's June 24, 2015, Zaleski Properties Comfort Letter (found in **Appendix F – Hazardous Materials**) be followed to prevent or limit human, environmental, and/or natural resource exposure to previously released hazardous substances and/or petroleum found at the site. The Zaleski Properties Comfort Letter included the following mitigation steps:

Table 4-3 Mitigation Summary of the Preferred Alternative	
Environmental Factor	**Proposed Mitigation and Permits**
	• Avoid any activities that may result in the exposure of individuals and ecosystems to the contaminated soils and groundwater, including the installation or use of any drinking wells or any residential use of the property. • Refrain from any activities that would involve the penetration of the water table. • Refrain from interfering with any future inspection or investigation activities at the property as conducted by EPA and IDEM. • Coordinate with EPA and IDEM to promptly complete and record a restrictive covenant under Indiana Code 13-11-2-193.5 to implement the use restrictions described above and to ensure ongoing access to EPA and IDEM to monitor conditions and conduct necessary actions at the site. For the LUST at the Riechmann Enterprises Incorporated site, the extent of contamination is unknown. However, since the conclusion of the IDEM coordination, the Airport has acquired the property and is responsible for any future cleanup. Remedial actions to date include the installation of a vertical oil underground seepage wall to limit any contamination from moving offsite. Prior to construction, it is recommended that soils be sampled near both sites, and a soils management plan be developed and implemented during construction of the Preferred Alternative, as necessary. The soils management plan used during construction should include the following: • A provision for an on-site monitor to evaluate excavated soils and determine if they have been impacted by historical releases. • A procedure for determination of a disposal location, and procedures for sampling of potentially impacted soils. • If impacted soils are encountered (i.e., odors, staining) during construction activities, soil samples should be collected and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum compounds (TPH) and RCRA listed metals (RCRA Metals) prior to offsite disposal and/or on-site relocation. • Off-site transport and disposal of soils must be coordinated to ensure compliance with applicable state and federal regulations. • If no contamination is observed during construction activities and it is anticipated that all soil will remain on Airport property, these soils may be relocated without being sampled for the chemicals of concern.

Table 4-3 Mitigation Summary of the Preferred Alternative	
Environmental Factor	**Proposed Mitigation and Permits**
	However, if at any time these soils must be sent off-site, soils must be analyzed for VOCs, SVOCs, TPH and RCRA Metals to identify appropriate disposal methods.
Historical, Architectural, Archeological, and Cultural Resources	If any prehistoric or historic archeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, the discovery must be reported to the Indiana State Historic Preservation Officer (SHPO) within two business days.
Land Use	Traffic from construction vehicles would be managed to avoid and minimize any impacts to local roads by defining haul routes and by scheduling the arrival and departure times of construction traffic so that normal traffic patterns are not interrupted.
Natural Resources and Energy Supply	Best Management Practices (BMPs) to reduce energy consumption during construction will be employed, where applicable. Sustainability features will be incorporated during design and construction to reduce energy consumption. These features may include use of energy efficient fixtures, point-of-use water heaters, efficient/upgraded insulation and LED lighting, and efficient HVAC systems. To reduce energy consumption associated with the temporary use of cranes, excavators, and vehicles for the Preferred Alternative, construction equipment should be in good working order to ensure the most efficient use of fuel. All vehicles and equipment should be checked for leaks and repaired immediately.
Noise and Noise Compatible Land Use	Construction staging areas are not allowed near noise-sensitive land uses.
Socioeconomics and Children's Environmental Health and Safety Risks	None Required.
Visual Effects (including Light Emissions)	None Required.
Water Resources	<u>Wetlands:</u> • 1.31 acres of emergent wetlands are expected to be impacted by the project.

Table 4-3 Mitigation Summary of the Preferred Alternative	
Environmental Factor	**Proposed Mitigation and Permits**
	• The Airport must go through the 404/401 permitting processes with both USACE and IDNR prior to impacting the wetlands. For non-exempt wetlands, a State Regulated Wetland permit must be obtained. • Proposed mitigation for wetland impacts will be the purchase of wetland credit through in-lieu fee (ILF) program. • Final mitigation requirements are at the discretion of USACE/IDNR and will be incorporated into the required wetland permit. • During final design of the Preferred Alternative, wetland impacts will be avoided and minimized as much as practicable. • All delineated wetlands will be shown on construction plans and flagged in the field to protect them from any possible direct or indirect impacts. Construction documents will also include avoidance and erosion control measures. <u>Floodplains:</u> None Required. <u>Surface Water:</u> • Soil erosion is a source of concern as a possible adverse impact to surface waters from construction projects. The following list of BMPs represents common erosion control measures that should be considered during construction and applied where applicable: o Sediment traps o Temporary cement ponds o Temporary grassing of disturbed areas o Vegetation cover replaced as soon as possible o Erosion mats and mulch o Silt fencing and drainage check dams o Settling basins for stormwater treatment • All excavated soils and staging areas for construction equipment will be placed in non-sensitive upland areas with disturbed areas replanted as soon as possible to reduce the likelihood of erosion. • Mitigation measures prepared under an erosion control plan in accordance with FAA AC 150/5370-10H, *Standard Specifications for Construction of Airports*, will help minimize long-term impacts to area water quality and to the existing drainage system. • The contractor will be required to obtain permit coverage under the Construction Stormwater General Permit (CSGP). To obtain permit coverage under the CSGP, applicants must file an online application or a

Table 4-3 Mitigation Summary of the Preferred Alternative	
Environmental Factor	**Proposed Mitigation and Permits**
	Notice of Intent (NOI) along with a Construction/Stormwater Pollution Prevention Plan (SWPPP). <u>Ground Water:</u> • To protect surface and ground water resources, runoff will be directed into the Airport's existing stormwater management system. Stormwater runoff will drain into the Airport's existing drainage system in accordance with its SWPPP. The SWPPP will also be updated to include BMPs to reduce erosion and discharge of pollutants from construction activities.