



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

March 13, 2006

Jennifer Mendelsohn
U.S. Department of Transportation
Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

Subject: Final Environmental Impact Statement (FEIS) for Phoenix Sky Harbor
International Airport, Maricopa County, Arizona (CEQ# 20060039)

Dear Ms. Mendelsohn:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Federal Aviation Administration (FAA) on August 10, 2005. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) because of unclear evaluation criteria for the elimination of alternatives not considered in the DEIS. We also recommended some clarifications be included in the FEIS regarding the air quality analysis, and that additional mitigation for air quality be considered.

EPA appreciates the additions to the alternatives analysis section in the FEIS in response to our comments. With regard to air quality, we continue to recommend that additional voluntary emission reduction measures be included in the design and construction specifications. We understand that overall air quality may be improved with this project. However, the Phoenix metropolitan area is classified as nonattainment for 8-hour ozone and particulate matter less than 10 microns (PM-10), and additional voluntary measures would benefit air quality. We request a commitment to these additional measures be included in the Record of Decision (ROD).

In EPA's comments on the DEIS, we commended FAA for the discussion of potential adverse human health impacts of HAP emissions from airport operations and construction. EPA concurs that a full human health risk assessment is unnecessary for this EIS given the likely beneficial effects to air quality from the proposed project. EPA does not agree, however, with statements in the FEIS regarding the inability to quantify potential impacts from HAPS in a meaningful way, given the limitations of existing modeling tools and critical input data, including HAP speciation profiles for commercial jet aircraft engines. For example, EPA worked as a cooperating agency with FAA to develop a HAP analysis for the O'Hare Airport Modernization Project EIS (see Appendix I of the EIS, available at

<http://www.agl.faa.gov/OMP/EISTechSim/ReferenceDocuments/DEISdocs.htm>). EPA is available to work with FAA in the future, to identify appropriate analysis methodologies for projects with potentially significant impacts from HAPs.

EPA notes the following updates pertinent to air quality in the Phoenix area that may affect the Phoenix Sky Harbor International Airport Project:

- Due to numerous exceedances of the PM-10 standard this past fall and winter, Phoenix will not attain the PM-10 standard by its serious area attainment date of December 31, 2006. The area will be subject to a Clean Air Act section 189(d) plan, due to EPA by 12/31/2007, which will require 5% reductions per year in PM-10 until the area attains the standard. It is possible that entities undertaking construction activities will be required to implement new control measures starting 1/1/08.
- In the time since EPA commented on the DEIS, Arizona Department of Environmental Quality has completed development of a Natural Events Action Plan for Maricopa County (including the City of Phoenix) to address dust problems associated with high wind events. The plan includes information on outreach for potential high pollution advisories associated with dust on high wind days. EPA recommends that FAA ensure all construction activities are in compliance with this plan. The plan can be accessed at <http://www.azdeq.gov/envIRON/air/plan/download/neapletter.pdf>.

EPA offers the following corrections to the FEIS:

- The FEIS notes under Table 4.2.5-1 (p. 4-14) that EPA has given Arizona an oxides of Nitrogen (NOx) waiver. This was true for 1-hour ozone, but this waiver does not apply for 8-hour ozone, which is now the applicable ozone standard.
- The response to comments regarding dust reduction measures includes an invalid website link (comment 19-3). The correct link should be <http://www.maricopa.gov/aq/divisions/planning.aspx>, and a reference to Rule 310 regarding fugitive dust should be noted.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3988 or Karen Vitulano, the lead reviewer for this document, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

/s/

Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division

cc: David Krietor, City of Phoenix Aviation Department

CC:

David Krietor
City of Phoenix Aviation Department
Phoenix City Hall
13th Floor
200 W Washington St
Phoenix AZ 85003