DRAFT ENVIRONMENTAL ASSESSMENT
GARY/CHICAGO INTERNATIONAL AIRPORT STORM AND SANITARY SEWER IMPROVEMENT PROJECT
GARY, LAKE COUNTY, INDIANA
SECTION 219, WRDA 1992, AS AMENDED

EAXX-202-00-H6P-1739280810

April 2025

U.S. Army Corps of Engineers Chicago District
231 South LaSalle Street, Suite 1500
Chicago, Illinois 60604

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DRAFT FINDING OF NO SIGNIFICANT IMPACT

GARY/CHICAGO INTERNATIONAL AIRPORT STORM AND SANITARY SEWER IMPROVEMENT PROJECT

GARY, LAKE COUNTY, INDIANA

The U.S. Army Corps of Engineers (USACE), Chicago District has conducted an environmental analysis in accordance with the National Environmental Policy Act of 1969, as amended. The Draft Environmental Assessment (EA) dated April 2025, for the Gary/Chicago International Airport Storm and Sanitary Sewer Improvement Project, addresses storm and sanitary sewer system improvement opportunities and feasibility in Gary, Lake County, Indiana. The recommendation is contained in the Letter Report, dated April 2025.

The Draft EA, incorporated herein by reference, evaluated a "No Action Alternative" and two alternatives that would address multiple deficiencies in the existing storm and sanitary sewer infrastructure in the study area. The recommended plan is Alternative 2, which includes: upgrades to the Boeing lift station including equipment and control replacement; rehabilitation of storm sewer pipe through cured-in-place-pipe (CIPP) lining, cleaning, root cutting; rehabilitation and improvement of storm sewer structures; rehabilitation of sanitary sewer pipe and manholes through CIPP lining; and one point repair of a sanitary sewer pipe.

The Draft EA evaluated the No Action Alternative as well as two other alternatives. The alternatives included:

No Action Alternative – Under this alternative, storm sewer and sanitary sewer replacement or rehabilitation would not occur. The existing infrastructure would continue to degrade for the service area resulting in storm and sanitary backups and overflows and costly emergency repairs and replacement projects.

Alternative 1: Replacement – Under this alternative, storm and sanitary sewer deficiencies would be addressed by full replacement of deficient infrastructure. This includes:

- Construction of a full duplex lift station including wet well structure, pumps, piping (35 LF of 8-inch PVC gravity sewer and 82 LF of 2-inch PVC force main), valves, aerations systems, controls, and flow meter structure at the Boeing facility.
- 4,660 LF of storm sewer pipe removal and replacement through open-cut methods
- 38 storm sewer structure replacements through open-cut methods
- 661 LF of sanitary sewer pipe removal and replacement through open-cut methods

- Two sanitary sewer manhole structure replacements

Alternative 2: Rehabilitation – Under this alternative, storm and sanitary sewer deficiencies would be addressed by repair and rehabilitation of deficient infrastructure. This includes:

- Removal and replacement of both pumps, controls and control panel, automatic aeration system and controls, and damaged equipment access hatch cover as well as addition of a new flow meter structure on the existing 2-inch PVC force main and float-type backup level controls at the Boeing lift station
- Approximately 2,769 LF of cured-in-place-pipe (CIPP) lining, 1,552 LF of heavy cleaning, 733 LF of root cutting of storm sewer pipe
- Cleaning, lid replacement, lid elevation to grade, filter bag installation, trash rack installation, or end section replacement at 95 storm sewer structures
- Approximately 350 LF of CIPP lining of sanitary sewer pipe and one point repair of sanitary sewer pipe
- Cleaning interior walls and spraying cementitious lining in two sanitary sewer manholes

For all alternatives, the potential effects were evaluated, as appropriate. A summary assessment of the potential effects of the recommended plan are listed in Table 1:

Table 1: Summary of Potential Effects of the Recommended Plan

	Insignificant effects	Insignificant effects as a result of mitigation*	Resource unaffected by action
Aesthetics	☒	☐	☐
Air quality	☒	☐	☐
Aquatic resources/wetlands	☐	☐	☒
Invasive species	☐	☐	☒
Fish and wildlife habitat	☐	☐	☒
Threatened/Endangered species/critical habitat	☐	☐	☒
Historic properties	☐	☐	☒
Other cultural resources	☐	☐	☒
Floodplains	☐	☐	☒
Hazardous, toxic & radioactive waste	☐	☐	☒
Hydrology	☐	☐	☒
Land use	☐	☐	☒
Navigation	☐	☐	☒
Noise levels	☒	☐	☐
Public infrastructure	☐	☐	☒
Socioeconomics	☐	☐	☒
At-risk communities	☐	☐	☒
Soils	☐	☐	☒
Tribal trust resources	☐	☐	☒
Water quality	☐	☐	☒

All practicable and appropriate means to avoid or minimize adverse environmental effects were analyzed and incorporated into the recommended plan. Best management practices (BMPs) as detailed in the Letter Report and Draft EA will be implemented, if appropriate, to minimize impacts.

No compensatory mitigation is required as part of the recommended plan.

Public review of the Draft EA and FONSI was initiated on April 17, 2025. All comments submitted during the public review period will be responded to in the Final EA and FONSI.

Pursuant to Section 7 of the Endangered Species Act of 1973, as amended, USACE accessed the USFWS IPaC website on February 11, 2025, to determine whether endangered, threatened, proposed, or candidate species could potentially be present in the action area, and if the action area overlapped with any designated or proposed critical habitat. Based on that information, USACE determined that the recommended plan will have “no effect” on federally listed species or their designated critical habitat.

Pursuant to the Coastal Zone Management Act of 1972, as amended, USACE determined that the recommended plan is consistent with the State of Indiana’s Lake Michigan Coastal Program (LCMP). The Indiana LCMP concurred with this determination in a letter dated February 18, 2025.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, USACE made the determination there would be no historic properties affected by the proposed undertaking. Consultation with the Indiana State Historic Preservation Office is ongoing, but concurrence with this determination is anticipated. USACE consulted with the consulted with the Citizen Potawatomi Nation of Oklahoma, the Forest County Potawatomi Community of Wisconsin, Hannahville Indian Community of Michigan, Little Traverse Bay Bands of Odawa Indians of Michigan, Miami Tribe of Oklahoma, the Prairie Band Potawatomi Nation, and the Pokagon Band of Potawatomi Indians of Michigan and Indiana. In a letter dated July 2, 2024, the Pokagon Band of Potawatomi Indians indicated that the project would have no adverse effect on any cultural resources but requested to be notified if any cultural artifacts or remains are located during the project. No other responses were received.

Pursuant to Sections 401 and 404 of the Clean Water Act of 1972, as amended, the USACE determined that this law does not apply to the proposed infrastructure project since the project does not involve any discharge or placement of fill into waters of the United States.

All applicable environmental laws have been considered and coordination with appropriate agencies and officials has been completed.

FINDING

Technical, environmental, and economic criteria used in the formulation of alternative plans were those specified in the Water Resources Council's 1983 Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies. All applicable laws, executive orders, regulations, and local government plans were considered in evaluation of alternatives. Based on this report, the reviews by other federal, state and local agencies, tribes, input of the public, and the review by my staff, it is my determination that the recommended plan would not cause significant adverse effects on the quality of the human environment; therefore, preparation of an Environmental Impact Statement is not required.

_____ _____

Date

Kenneth P. Rockwell
Colonel, U.S. Army
Commanding

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Appendix A – Vehicle and Equipment Usage for Design Alternatives

Draft Environmental Assessment Gary/Chicago International Airport Storm and Sanitary Sewer Improvement Project

Greenhouse Gas Contributing Equipment Estimate – Pre-60% Design

Project Name: Gary/Chicago International Airport (GCIA)
Storm and Sanitary Sewer Improvements Project

Lift Station Improvements

Alternative 1 - Upgrades to the Existing Lift Station

Description: This alternative includes upgrades to the interior of the existing lift station, replacing equipment and controls, access hatch cover, and adding new flow meter vault.

Equipment & Meter Vault Installation

Medium excavator (CAT 325) – 8 hours per day for 15 days
Service truck – 8 hours per day for 15 days

Alternative 2 – Construct New Lift Station

Description: This alternative includes construction of a new complete lift station, valve vault, flow meter vault, approximately 35 LF of 8-inch PVC gravity sewer, connecting manhole, and approximately 82 LF of 2-inch PVC force main.

Lift Station and Vaults Installation

Medium excavator (CAT 325) – 8 hours per day for 25 days
Small wheel loader (CAT 926) – 8 hours per day for 25 days
Semi dump trucks – 2 trucks for 8 hours per day for 25 days
Service truck – 8 hours per day for 25 days

Excavate and Backfill Gravity Sewer and Force Main

Medium excavator (CAT 325) – 8 hours per day for 5 days
Small wheel loader (CAT 926) – 8 hours per day for 5 days
Semi dump trucks – 2 trucks for 8 hours per day for 5 days

STORM SEWER EVALUATION

Alternative 1 – No Action

Description: For this alternative, the existing storm sewer and structures would remain as-is and would not be replaced or rehabilitated

Alternative 2 – Open-Cut Sewer and Structure Replacement

Description: This alternative involves the removal of approximately 4,660 LF of existing storm sewer and 38 storm structures that need repair and replace them with new

Storm Sewer-Open-Cut (Approximately 200 LF per day with additional days added for point replacements)
Medium excavator (CAT 325) – 8 hours per day for 40 days
Small wheel loader (CAT 926) – 8 hours per day for 40 days
Skid steer (CAT 249) - 4 hours per day for 40days
Semi dump trucks – 2 trucks for 8 hours per day for 40 days

Storm Structures-Open-Cut
Medium excavator (CAT 325) – 8 hours per day for 40 days
Small wheel loader (CAT 926) – 8 hours per day for 40 days
Skid steer (CAT 249) - 4 hours per day for 40days
Semi dump trucks – 2 trucks for 8 hours per day for 40 days

Alternative 3 – Recommended Rehabilitation Methods
Description: This alternative involves rehabilitation of the storm sewer and structures using trenchless technologies. Approximately 2,769 LF of cured-in-place-pipe (CIPP) lining, approximately 1,552 LF of heavy cleaning/TV, and approximately 733 LF of root cutting. Approximately 95 structures requiring cleaning, lid replaced or raised, filter bag installation, trash rack installation, or replacement

Storm Sewers-CIPP Lining (approximately 500 LF per day with additional days added for spot repair lining)
Boiler truck – 8 hours per day for 8 days
Refrigeration truck – 8 hours per day for 8 days
TV/cutting truck – 8 hours per day for 8 days
Service truck – 8 hours per day for 8 days

Storm Sewers-Heavy Cleaning
Cleaning/cutting truck – 8 hours per day for 5 days
Service truck – 8 hours per day for 5 days

Storm Sewers-Root Cutting
Cleaning/cutting truck – 8 hours per day for 4 days
Service truck – 8 hours per day for 4 days

Storm Structures-Rehabilitation
Vactor truck – 8 hours per day for 5 days
Mini excavator (CAT 305) – 8 hours per day for 10 days
Service truck – 8 hours per day for 15 days

SANITARY SEWER EVALUATION

Alternative 1 – No Action

Description: For this alternative, the existing sanitary sewer and manholes would remain as-is and would not be replaced or rehabilitated

Alternative 2 – Open-Cut Sewer and Manhole Replacement

Description: Description: This alternative involves the removal and replacement of approximately 661 LF of existing sanitary sewer and 2 sanitary manholes

Sanitary Sewer-Open-Cut (Approximately 200 LF per day with additional days added for point replacements)
Medium excavator (CAT 325) – 8 hours per day for 5 days
Small wheel loader (CAT 926) – 8 hours per day for 5 days
Skid steer (CAT 249) - 4 hours per day for 5 days
Semi dump trucks – 2 trucks for 8 hours per day for 5 days

Sanitary Manholes-Open-Cut
Medium excavator (CAT 325) – 8 hours per day for 2 days
Small wheel loader (CAT 926) – 8 hours per day for 2 days
Skid steer (CAT 249) - 4 hours per day for 2 days
Semi dump trucks – 2 trucks for 8 hours per day for 2 days

Alternative 3 – Recommended Rehabilitation Methods

Description: This alternative involves rehabilitation of the sanitary sewer and manholes using trenchless technologies such as cured-in-place-pipe (CIPP) lining and manhole lining. Approximately 350 LF of cured-in-place-pipe (CIPP) lining (multiple locations of varying length), 1 sewer point replacement, and 2 manholes to be lined.

Sanitary Sewer-CIPP Lining (approximately 500 LF per day with additional days added for spot repair lining)
Boiler truck – 8 hours per day for 4 days
Refrigeration truck – 8 hours per day for 4 days
TV/cutting truck – 8 hours per day for 5 days
Service truck – 8 hours per day for 5 days

Sewer-Open-Cut (Point Replacement)
Medium excavator (CAT 325) – 8 hours per day for 2 days.
Small wheel loader (CAT 926) – 8 hours per day for 2 days.
Skid steer (CAT 249) - 4 hours per day for 40days.

Semi dump trucks – 2 trucks for 8 hours per day for 2 days.

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Appendix B – Coordination

Draft Environmental Assessment Gary/Chicago International Airport Storm and Sanitary Sewer Improvement Project

- Scoping Responses
- Resource Coordination

SCOPING RESPONSES

DNR Indiana Department of Natural Resources

Eric Holcomb, Governor
Daniel W. Bortner, Director

Division of Historic Preservation & Archaeology·402 W. Washington Street, W274·Indianapolis, IN 46204-2739
Phone 317-232-1646·Fax 317-232-0693·dhpa@dnr.IN.gov

June 25, 2024

Andrew J. Miller
Landscape Architect/Planner
US Army Corps of Engineers, Chicago District
231 S LaSalle St. Suite 1500
Chicago, IL 60604

Federal Agency: U.S. Army Corps of Engineers

Re: Information for a proposed infrastructure project at the Gary/Chicago International Airport (DHPA #32393)

Dear Mr. Miller:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated and received on June 4, 2024, for the above indicated project in Gary, Lake County, Indiana.

Based upon the documentation available to the staff of the Indiana SHPO, we have not identified any historic buildings, structures, districts, or objects listed in or eligible for inclusion in the National Register of Historic Places within the probable area of potential effects.

In terms of archaeology, no currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places have been recorded within the proposed project area. No archaeological investigations appear necessary provided that all project activities remain within areas disturbed by previous construction.

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

At this time, it would be appropriate for the Army Corps of Engineers to analyze the information that has been gathered from the Indiana SHPO, the general public, and any other consulting parties and make the necessary determinations and findings. Please refer to the following comments for guidance:

1) If the Army Corps of Engineers believes that a determination of "no historic properties affected" accurately reflects its assessment, then it shall provide documentation of its finding as set forth in 36 C.F.R. § 800.11 to the Indiana SHPO, notify all consulting parties, and make the documentation available for public inspection (36 C.F.R. §§ 800.4[d][1] and 800.2[d][2]).

2) If, on the other hand, the Army Corps of Engineers finds that an historic property may be affected, then it shall notify the Indiana SHPO, the public and all consulting parties of its finding and seek views on effects in accordance with 36 C.F.R. §§ 800.4(d)(2) and 800.2(d)(2). Thereafter, the Army Corps of Engineers may proceed to apply the criteria of adverse effect and determine whether the project will result in a "no adverse effect" or an "adverse effect" in accordance with 36 C.F.R. § 800.5.

The 36 C.F.R. Part 800 regulations governing the Section 106 review process may be found at www.achp.gov. If you have questions about archaeological issues please contact Amy Johnson at (317) 232-6982 or ajohnson@dnr.IN.gov. If you have questions about buildings or structures please contact Miriam Burkett at (317) 233-3883 or mburkett@dnr.IN.gov. Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #32393.

Very truly yours,

Beth K. McCord
Deputy State Historic Preservation Officer

BKM:ALJ:MLB:mlb

REGION 5
CHICAGO, IL 60604

July 2, 2024

VIA ELECTRONIC MAIL ONLY

Andrew Miller
U.S. Army Corps of Engineers – Chicago District
231 South LaSalle Street
Chicago, Illinois 60604

Re: EPA Scoping Comments: Storm Sewer Improvements at Gary/Chicago International Airport; Gary, Lake County, Indiana

Dear Mr. Miller:

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Army Corps of Engineers' (USACE) June 4, 2024, request for comments (hereafter: scoping document) to inform development of a Draft Environmental Assessment (EA) for the project referenced above. USACE is the lead Federal agency under NEPA, and the Gary/Chicago International Airport (Airport) is the non-Federal project sponsor. This letter provides EPA's comments on the proposal, pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The non-Federal sponsor is working with USACE to improve the existing sanitary and storm sewer system at the Airport. Proposed storm sewer improvements include point repair of a 36-inch diameter storm sewer pipe, replacement of 300 linear feet (LF) of 15-inch diameter pipe, cleaning and inspection of 1,200 LF of 10-inch to 54-inch diameter pipe, and lining of 2,400 LF of 10-inch to 30-inch diameter pipe. Proposed sanitary sewer improvements include replacement of pump station pumps, level monitoring systems, controls, and access cover.

EPA's detailed comments on the scoping document are enclosed with this letter. We recommend that USACE address these comments and our recommendations, which generally relate to air quality, water quality, climate change, construction, environmental justice, energy efficiency, threatened and endangered species, invasive species, coastal resources, and cumulative impacts, before finalizing the forthcoming Draft EA.

Thank you for the opportunity to provide input at the earliest stages of project development. Please send an electronic copy of future NEPA documents to R5NEPA@epa.gov. If you have questions or would like to discuss the contents of this letter further, please contact the lead NEPA reviewer, Julie Car, at car.julie@epa.gov or 312-353-1369.

Sincerely,

Krystle Z. McClain, P.E.
NEPA Program Supervisor
Environmental Justice, Community Health, and
Environmental Review Division

ENCLOSURES
EPA's Detailed Comments
Construction Emission Control Checklist

cc (with enclosures):
Bobb Beauchamp, FAA (bobb.beauchamp@faa.gov)
Robin McWilliams Munson, USFWS (Robin_McWilliams@fws.gov)
Marty Maupin, IDEM (mmaupin@idem.in.gov)
Rachel Van Voorhis, IDNR (environmentalreview@dnr.in.gov)
Jenny Orsburn, IDNR (JeOrsburn@dnr.IN.gov)

EPA's Detailed Scoping Comments
Storm Sewer Improvements at Gary/Chicago International Airport
City of Gary, Lake County, Indiana

July 2, 2024

1. AIR QUALITY

A. The proposed project would result in emissions from construction equipment. Temporary construction emissions have the potential to impact human health, especially in sensitive populations, such as the elderly, children, and those with impaired respiratory systems.

Recommendations for the Draft EA:

1. Discuss the current air quality for the project area. Indicate whether the project area is in non-attainment status for any National Ambient Air Quality Standards (NAAQS).
2. Discuss potential emissions expected from implementation of the proposed project. Consider equipment used for construction as well as truck trips to haul materials.
3. Identify and commit to specific measures to reduce construction emissions. Options include: (1) requiring dust suppressant strategies, such as watering soils, (2) limiting and enforcing idle time for construction trucks and heavy equipment, and (3) soliciting bids that require zero-emission technologies or advanced emission control systems. Additional best practices are identified in the enclosed Construction Emission Control Checklist.
4. Create a construction traffic management plan that ensures trucks hauling materials and heavy machinery avoid areas where children congregate within adjacent neighborhoods, when possible. Route construction truck traffic away from schools, daycare facilities, and parks, if applicable, and use crossing guards when such areas cannot be avoided. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents.

2. AQUATIC RESOURCE IMPACTS

A. Regulated wetlands or Waters of the U.S. may be located within the project footprint or staging areas. Floodplain areas adjacent to the Grand Calumet River in which work is proposed may contain wetlands. The placement of fill in wetlands may trigger the need for permitting from the Indiana Department of Environmental Management (IDEM).

Recommendations for the Draft EA: A formal wetland and Waters of the U.S. delineation should be completed to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging areas and access roads are investigated for the presence of regulated water resources. The delineation should be coordinated with the USACE Regulatory Branch and we recommend coordinating with IDEM for review and any necessary permit requirements. EPA strongly

recommends that the delineation be completed before and included in (as an appendix to) the Draft EA, along with a copy of the jurisdictional determination.

3. WATER QUALITY

A. The Grand Calumet River, located directly south of and adjacent to the Airport, is listed as impaired on the Clean Water Act (CWA) Section 303(d) list of impaired water bodies. The most recent assessment (2024) specified that designated uses that are classified as impaired include Full Body Contact, Human Health and Wildlife, and Warm Water Aquatic Life.[1]

Recommendations for the Draft EA:

1. Discuss existing water quality issues within the Grand Calumet River and how the proposed project (and all alternatives, including the No-Action alternative) may affect water quality.
2. Describe proposed measures to capture and filter stormwater runoff from construction of the proposed project.
3. Identify and discuss whether National Pollution Discharge Elimination System CWA Section 402 direct discharge and/or stormwater construction permits may be required for each alternative.

4. CLIMATE CHANGE AND GREENHOUSE GASES

A. Executive Order 14008: Tackling the Climate Crisis at Home and Abroad states, "*The United States and the world face a profound climate crisis. We have a narrow moment to pursue action…to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents*." The U.S. Global Change Research Program's National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events.[2]

Any action alternative would directly release greenhouse gas (GHG) emissions during construction from trucks hauling materials, workers' vehicles, and operation of construction equipment. It is important for the Draft EA to fully quantify and adequately disclose the impacts of GHG emissions from the No Action alternative and all action alternatives and discuss the implications of those emissions in light of science-based policies established to avoid the worsening impacts of climate change.

Federal courts have consistently held that NEPA requires agencies to disclose and consider climate impacts in their reviews, including impacts from GHG emissions. On January 9, 2023, the Council on Environmental Quality (CEQ) published interim guidance to assist Federal agencies in assessing and disclosing climate change impacts during environmental reviews.[3]

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[1] See: https://mywaterway.epa.gov/waterbody-report/21IND/INK0346_04/2024

[2] Information regarding changing climate conditions is available through the National Climate Assessment at https://nca2023.globalchange.gov/

[3] https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate

CEQ developed this interim guidance in response to Executive Order 13990: Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in progress, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends that USACE apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.

In addition, estimates of the social cost of greenhouse gases (SC-GHG)[4] are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to monetize the societal value of changes in GHG emission from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon ($SC\text{-}CO_2$) and other GHGs (e.g., social cost of methane ($SC\text{-}CH_4$)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action alternative) would inform project decision-making and provide clear support for implementing all practicable measures to minimize GHG emissions and releases.

EPA recommends that USACE review EPA's final technical report, "*Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances*,"[5] which explains the methodology underlying the most recent set of SC-GHG estimates. To better assist lead Federal agencies with the utilization of these updated estimates, EPA has also recently released a Microsoft Excel "*Workbook for Applying SC-GHG Estimates v.1.0.1*" spreadsheet[6] which was designed by EPA's National Center for Environmental Economics to help analysts calculate the monetized net social costs of increases in GHG emissions using the estimates of the SC-GHGs.

Recommendations for the Draft EA: USACE should apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. Additional recommendations are as follows:

1. ***Emissions & SC-GHG Disclosure and Analysis***
   a) Quantify estimates of all direct and indirect GHG emissions[7] from the proposed project over its anticipated lifetime for all alternatives, including the No Action alternative, broken out by GHG type.

[4] EPA uses the general term, "social cost of greenhouse gases" (SC-GHG), where possible because analysis of GHGs other than CO_2 are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon ($SC\text{-}CO_2$), social cost of methane ($SC\text{-}CH_4$), and social cost of nitrous oxide ($SC\text{-}N_2O$) can collectively be referenced as the SC-GHG.

[5] https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf

[6] https://www.epa.gov/environmental-economics/scghg

[7] As discussed in Section IV(A) of CEQ's 2023 interim guidance, "agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the No Action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information."

b) Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO_2 and other GHGs resulting from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO_2-equivalent (CO_2e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (i.e., monetize CH_4 emissions changes expected to occur with the social cost of methane (SC-CH_4) estimate for emissions).[8] When applying SC-GHG estimates, just as with tools to quantify emissions, USACE should disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts.
c) Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making.
d) Avoid expressing the overall project-level GHG emissions as a percentage of the state or national GHG emissions. The U.S. must reduce GHG emissions from a multitude of sources, each making relatively small individual contributions to overall GHG emissions, in order to meet national climate targets.

2. ***Consistency with Climate Policy***
   a) Include a detailed discussion of the proposed project's GHG emissions in the context of national and international GHG emissions reduction goals, including the U.S. 2030 Paris GHG reduction target and 2050 net-zero policy.
   b) Provide an analysis of GHG emissions in the context of Indiana's policies and GHG emissions reduction goals.[9] This analysis should inform and improve USACE's consideration of mitigation measures.
   c) Discuss the implications of the expected increase in GHGs should the proposed project be implemented. Additionally, discuss the ramifications of making it more difficult to meet state emissions goals due to the increase in GHGs.
   d) Discuss how the Inflation Reduction Act (IRA) may impact energy consumption patterns and GHG emissions. The IRA is expected to reduce dependence on fossil fuels while increasing availability for renewable energy sources. The Department of Energy has estimated the impacts of the IRA on clean energy and GHG emissions.[10] That report, and its appendix, contain several resources on future energy consumption patterns and forecasts.[11]

[8] Transforming gases into CO_2e using Global Warming Potential (GWP) metrics, and then multiplying the CO_2e tons by the SC-CO_2, is not as accurate as a direct calculation of the social costs of non-CO_2 GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases' February 2021 Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990 for more discussion and the range of annual SC-CO_2, SC-CH_4, and SC-N_2O estimates currently used in Federal benefit-costs analyses.

[9] Including, but not limited to, the goals for Indiana laid out here: https://www.in.gov/idem/airquality/files/cprg_20240301_final_pcap.pdf

[10] https://www.energy.gov/sites/default/files/2022-08/8.18%20InflationReductionAct_Factsheet_Final.pdf

[11] Appendix and resources can be found at: https://www.energy.gov/policy/methodological-appendix

e) Include a complete discussion of the extent to which the estimated GHG emissions from the proposed project and alternatives may be inconsistent with the need to take actions necessary to achieve science-based GHG reduction targets.[12]

3. ***Resilience and Adaptation***
   a) Identify practices to reduce and mitigate GHG emissions; include commitments by USACE to do so in the Draft EA. We recommend USACE consider practices in the enclosed Construction Emission Control Checklist.
   b) Analyze best available control strategies, while considering sensitive environmental and health receptors (e.g., schools and play areas along truck travel routes).

5. CONSTRUCTION

A. The Draft EA should address the potential for impacts relating to construction noise and staging. Recommendations are as follows.

Recommendations for the Draft EA:

1. ***Construction Noise***
   a) Identify residences and other sensitive receptors that would potentially be impacted by construction noise. Include residences, cultural and religious gathering spots, schools, day care centers, senior housing, community centers, medical facilities, and offices. Assess how the project would impact such receptors.
   b) Provide a plan for giving residents sufficient warning of noise-intensive activities.

2. ***Staging***
   a) Include an exhibit showing the location of potential staging areas and access roads and associated impacts.
   b) Discuss the transport of necessary materials, anticipated number of transport vehicles traveling to the construction site each day, and whether work will take place during daytime or nighttime hours and weekdays only or 7 days/week.
   c) Include best management practices to be employed to minimize construction impacts to air quality, water resources, soil (e.g., sediment and erosion control methods), and other regulated resources.

[12] See, e.g., Executive Order 14008; U.S. Nationally Determined Contribution to the Paris Agreement (April 20, 2021).

6. ENVIRONMENTAL JUSTICE

A. Outreach and meaningful engagement are underlying pillars of environmental justice. It is imperative that USACE determine if construction, operation, and maintenance of the proposed project (or alternatives) will impact communities with environmental justice concerns. EPA's recommendations below suggest opportunities to further analyze, disclose, and reduce such impacts.

Recommendations for the Draft EA:

1. Identify the presence of communities with environmental justice concerns within the project area and within the broader area that could experience environmental impacts from the proposed project. Disclose demographic information and summarize input from community members.
2. Describe past activities and future plans to engage communities with environmental justice concerns and Tribes, if applicable, during the environmental review and planning phase, and, if the project commences, during construction and operations.
3. Evaluate the impacts of the proposed project on communities with environmental justice concerns and sensitive receptors (e.g., children, people with asthma, etc.).
4. Include an analysis and conclusion regarding whether the proposed action or any action alternatives may have disproportionately high and adverse impacts on communities with environmental justice concerns, as specified in CEQ's *Environmental Justice Guidance*.[13]
5. Compare project impacts on communities with environmental justice concerns with an appropriate reference community to determine whether there may be disproportionate impacts. Consider risk of exposure to hazardous/toxic materials associated with the proposed construction and operation and air quality and noise impacts due to construction.
6. Consider any disproportionate non-project-related pollution exposures that communities of concern may already be experiencing, as well as any disproportionate non-pollution stressors that may make the communities susceptible to pollution, such as health conditions, other social determinants of health, and disproportionate vulnerability related to climate change.
7. Identify measures to ensure meaningful community engagement, minimize adverse community impacts, and avoid disproportionate impacts to communities with environmental justice concerns.
8. Use census-tract-level information to initially help locate communities with environmental justice concerns. For initial screening, use EPA's EJSCREEN[14] mapping tool.

[13] CEQ's Environmental Justice Guidance Under the National Environmental Policy Act. See Section III, Part C-4, https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf

[14] http://www.epa.gov/ejscreen

9. In conducting the environmental justice analysis, utilize resources such as the Promising Practices Report[15] and the Community Guide to Environmental Justice and NEPA Methods[16] to appropriately engage in meaningful, targeted, community outreach, analyze impacts, and advance environmental justice principles through NEPA implementation.
10. Consider cumulative environmental impacts to communities with environmental justice concerns, Tribes, and indigenous peoples in the project area within the environmental justice analysis and disclose conclusions on those impacts.
11. Provide an analysis and findings as to whether the proposed project and all alternatives, including the No Action alternative, would likely have disproportionate adverse impacts on communities with environmental justice concerns or Tribes. Identify what those impacts may be and include measures that will be taken to avoid, minimize, or mitigate impacts.
12. Establish material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. Careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes in the Draft EA.

7. ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES

A. Energy efficient design and material selection for construction of the proposed project could reduce operations costs while also protecting the environment. Recycling construction debris also reserves valuable landfill space and makes use of materials that have high embodied energy.

Recommendations before finalizing the Draft EA: USACE should consider committing to the following:

1. Identifying and implementing opportunities for additional green stormwater management practices (e.g., bioswales);
2. Discussing to what extent USACE will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 14057; and
3. Committing to recycle a high percentage of construction and demolition debris.

8. THREATENED AND ENDANGERED SPECIES

A. The U.S. Fish and Wildlife Service (USFWS) hosts a project planning tool to assist with the environmental review process, known as IPAC – Information for Planning and Conservation.

[15] https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf
[16] https://www.energy.gov/sites/prod/files/2019/05/f63/NEPA%20Community%20Guide%202019.pdf

Recommendations for the Draft EA:

1. Include results of coordination, recommendations, and stipulations with the USFWS and Indiana Department of Natural Resources (IDNR) regarding Federal- and state-listed threatened or endangered species or their critical habitat.
2. Discuss potential effects to wildlife resources from all proposed alternatives and whether any seasonal work restrictions will be required.

9. NOXIOUS AND INVASIVE SPECIES

A. Construction and earthmoving may allow for non-native invasive species (NNIS) to be brought into the project area on construction equipment.

Recommendations for the Draft EA:

1. Discuss standard best management practices (e.g., washing construction equipment) that would be used to eliminate the spread of NNIS into, as well as out of, the project area.
2. If NNIS are present in the project area, identify all NNIS in the project area and specific measures that will be taken to control and/or eradicate existing populations, ideally before earthmoving activities begin.
3. Discuss how Indiana guidelines on invasive species management[17] will be incorporated into the proposed project.

10. COASTAL ZONE MANAGEMENT ACT

A. The proposed project is located within the boundary of Indiana's Lake Michigan Coastal Program and will require a Federal Consistency Determination under the Coastal Zone Management Act (CZMA).

Recommendations for the Draft EA: Provide information on the status of coordination with IDNR regarding the request for a Federal Consistency Determination.

11. DIRECT, INDIRECT, AND CUMULATIVE IMPACTS

A. The Airport has a long history of both NEPA reviews and permitted actions with cumulative impacts to wetlands and other natural resources. It is expected that the forthcoming EA will analyze all direct, indirect, and cumulative impacts of all action alternatives as well as the No Action alternative.
   - Direct impacts are caused by an action and occur at the same time and place.
   - Indirect impacts are caused by an action and are later in time or farther removed in distance but are still reasonably foreseeable.
   - Cumulative impacts are those that result from a proposed action's incremental impacts when these impacts are added to the impacts of other past, present, and reasonably foreseeable similar future actions, including those under the control of other entities.

[17] See: https://www.in.gov/dnr/files/fw-terrestrial-invasive-plan-2020.pdf

Recommendations for the Draft EA:

1. Summarize development, including proposed development, in the area.
2. Disclose and analyze potential direct, indirect, and cumulative impacts to resources (e.g., aquatic and terrestrial resources) in the project area.

12. INTERAGENCY COORDINATION

A. The Draft EA should discuss coordination planning undertaken with landowners, state and Federal resource agencies, and local municipalities.

Recommendations for the Draft EA:

1. Include a list of all Federal, state, and local permits that will be required to undertake the preferred alternative.
2. Provide information on coordination with the state resource agencies regarding required permitting, and any required mitigation for proposed work.
3. Include copies of all inter-agency consultation coordination sent to, and received from, landowners, state and Federal resource agencies, and local municipalities. This includes, but is not limited to, correspondence regarding historic and cultural resources (State Historic Preservation Office), wetlands and streams (IDEM), and Federal and state threatened and endangered species (USFWS, IDNR).

13. OTHER COMMENTS

A. The scoping document did not address how USACE will consider scoping comments.

Recommendations for the Draft EA:

1. Include an appendix to include all comments received during the scoping comment period, including any applicable transcripts of comments from the public, and copies of all comment letters received.
2. For all government agency letters received, include USACE's responses to specific comments from each letter.

B. The scoping document requested information EPA may have regarding environmental resources in the project area.

Recommendations for the Draft EA: USACE can access the following resources to obtain environmental information related to the project area:

- WATERS (Watershed Assessment, Tracking, & Environmental Results System):[18] https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system
- Envirofacts:[19] https://www3.epa.gov/enviro/facts/multisystem.html

[18] The Watershed Assessment, Tracking, & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases.
[19] Includes enforcement and compliance information.

- EJSCREEN: https://www.epa.gov/ejscreen
- NEPAssist: https://www.epa.gov/nepa/nepassist
- CWA 303(d) Listed Impaired Waters: https://mywaterway.epa.gov/waterbody-report/21IND/INK0346_04/2024
- National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/anayo_in.html

U.S. Environmental Protection Agency
Construction Emission Control Checklist

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012, the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.[1] We recommend USACE consider the following protective measures and commit to applicable measures in the Draft EA.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).[2]
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).[3]
- Locomotives: Locomotives servicing infrastructure sites should meet, or exceed, the EPA Tier 4 exhaust emissions standards for line-haul and switch locomotive engines where possible.
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).[4]
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles,

[1] Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet.* July 13, 2012.
[2] https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles
[3] https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles
[4] https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards

battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health,[5] EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.
- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

[5] Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.

From:	Harrison, Sarah A
To:	Miller, Andrew J CIV USARMY CELRC (USA)
Cc:	McWilliams, Robin
Subject:	[Non-DoD Source] Fw: [EXTERNAL] EPA NEPA Comments - Gary/Chicago International Airport Storm Sewer Improvements
Date:	Thursday, July 11, 2024 9:56:03 AM
Attachments:	image001.png FINAL_EPA Scoping Comments -Gary_Chicago Airport Draft EA.pdf

Andrew we were CCd on comments to this EA and with some recent turn over in our office with Liz retiring recently we wanted to reach out and make sure you had the correct contact information for the Indiana Field Office. For most section 7 consultations and EA's we would recommend that they be sent to our office email address at IndianaFO@fws.gov if it is a project with INDOT or Federal Highways' funding it can be sent directly to Robin at Robin_McWiliams@fws.gov.

On this project in particular if you are wanting comments from FWS on the EA please send it to our office email address and it will be assigned to be reviewed. We would recommend any project even at the draft EA stage request an official species list in IPaC (IPaC: Home (fws.gov)) so that you have a baseline for species that occur in your project area and that may be impact by the project. We would also ask that you either attach or reference the IPaC consultation code when submitting your project for review.

Please let me know if you have any questions

Sarah Harrison

Sarah Harrison
Fish & Wildlife Biologist
USFWS Indiana Field Office
620 South Walker St
Bloomington, IN 47403
Phone direct: 812-902-1748

From: McWilliams, Robin <robin_mcwilliams@fws.gov>
Sent: Tuesday, July 2, 2024 1:14 PM
To: Harrison, Sarah A <sarah_harrison@fws.gov>
Subject: Fw: [EXTERNAL] EPA NEPA Comments - Gary/Chicago International Airport Storm Sewer Improvements

Not sure if this is mine or yours?? I don't typically deal with storm sewers from the EPA perspective. If you don't either, I can look at it.

Robin

Pokégnek Bodéwadmik
POKAGON BAND OF POTAWATOMI
HISTORY & CULTURE CENTER

07/02/2024

Andrew J Miller
231 South LaSalle Street, Suite 1500
Chicago
ILLINOIS
60604
312-846-5571
Andrew.j.miller2@usace.army.mil

Gary/Chicago International Airport Sewer System & Pump Station Improvements – Gary, IN

Dear Responsible Party:

Migwėtth for contacting me regarding this project. As THPO, I am responsible for handling Section 106 Consultations on behalf of the tribe. I am writing to inform you that I have reviewed the details for the project referenced above. The proposed work is occurring within a mile of known archaeological sites, historic sites or features that are considered sensitive or recorded in the Pokagon Band Historic Inventory Database. I have made the determination that the project will have **No Adverse Effect** on any historic, religious, or culturally significant resources to the Pokagon Band of Potawatomi Indians.

If any cultural or archaeological resources are uncovered during construction, please stop work, and contact me immediately. Should you have any other questions, please don't hesitate to contact me at your earliest convenience.

Sincerely,

Matthew Bussler

Matthew J.N. Bussler
Tribal Historic Preservation Officer
Pokagon Band of Potawatomi Indians
Office: (269) 462-4316
Cell: (269) 519-0838
Matthew.Bussler@Pokagonband-nsn.gov

Robin McWilliams Munson
Fish and Wildlife Biologist/Transportation Liaison
U.S. Fish and Wildlife Service
Indiana Ecological Services Field Office
620 South Walker Street
Bloomington, IN 47403
Robin_McWilliams@fws.gov
***NEW* 812-902-1752**

Mon-Tues 8:30-4:30p
Wed-Thurs 8:30-4:30p Telework

From: Car, Julie <Car.Julie@epa.gov>
Sent: Tuesday, July 2, 2024 12:42 PM
To: andrew.j.miller2@usace.army.mil <andrew.j.miller2@usace.army.mil>
Cc: bobb.beauchamp@faa.gov <bobb.beauchamp@faa.gov>; McWilliams, Robin <robin_mcwilliams@fws.gov>; MAUPIN, MARTY <mmaupin@idem.in.gov>; environmentalreview@dnr.in.gov <environmentalreview@dnr.in.gov>; jeorsburn@dnr.in.gov <jeorsburn@dnr.in.gov>
Subject: [EXTERNAL] EPA NEPA Comments - Gary/Chicago International Airport Storm Sewer Improvements

Hello,
Attached to this email are EPA's comments regarding the scoping request for storm sewer improvements at Gary/Chicago International Airport, City of Gary, Lake County, Indiana.

Please do not hesitate to contact me if you have questions or comments regarding our correspondence. We appreciate the opportunity to be involved in the NEPA process.

Thank you,
Julie Car

Julie Car
National Environmental Policy Act (NEPA) Team
US Environmental Protection Agency Region 5
77 W. Jackson Blvd.
Chicago, IL 60604
Phone: 312-353-1369
Email: car.julie@epa.gov


UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

RESOURCE COORDINATION

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Indiana Ecological Services Field Office
620 South Walker Street
Bloomington, IN 47403-2121
Phone: (812) 334-4261 Fax: (812) 334-4273

In Reply Refer To: 02/11/2025 20:09:37 UTC
Project Code: 2025-0054951
Project Name: 219 - GCIA Storm and Sanitary Sewer Improvements Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

Please use the species list provided and visit the U.S. Fish and Wildlife Service's Region 3 Section 7 Technical Assistance website at - http://www.fws.gov/midwest/endangered/section7/s7process/index.html. This website contains step-by-step instructions which will help you

determine if your project will have an adverse effect on listed species and will help lead you through the Section 7 process. For all **wind energy projects** and **projects that include installing towers that use guy wires or are over 200 feet in height**, please contact this field office directly for assistance, even if no federally listed plants, animals or critical habitat are present within your proposed project or may be affected by your proposed project.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of

Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. **Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.**

Attachment(s):

- Official Species List
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Indiana Ecological Services Field Office
620 South Walker Street
Bloomington, IN 47403-2121
(812) 334-4261

PROJECT SUMMARY

Project Code: 2025-0054951
Project Name: 219 - GCIA Storm and Sanitary Sewer Improvements Project
Project Type: Utility Infrastructure Maintenance
Project Description: The project involves improvements to the storm and sanitary sewer systems at the Gary/Chicago International Airport. Improvements include:
- Mechanical upgrades to the existing lift station
- Rehabilitation to approximately 2,700 LF of the existing sewer system through cleaning, root cutting, CIPP lining, and structure repair/ rehabilitation.
- Rehabilitation to approximately 350 LF of sanitary sewer with CIPP lining, 2 manhole lining, 1 sewer point replacement.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@41.61789615,-87.41396613069324,14z

Counties: Lake County, Indiana

ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana Bat *Myotis sodalis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered

BIRDS

NAME	STATUS
Piping Plover *Charadrius melodus* Population: [Great Lakes watershed DPS] - Great Lakes, watershed in States of IL, IN, MI, MN, NY, OH, PA, and WI and Canada (Ont.) There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6039	Endangered
Whooping Crane *Grus americana* Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non-Essential

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow

appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

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1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are Bald Eagles and/or Golden Eagles in your project area.

Measures for Proactively Minimizing Eagle Impacts
For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the National Bald Eagle Management Guidelines. You may employ the timing and activity-specific distance recommendations in this document when designing your project/ activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to Bald Eagle Nesting and Sensitivity to Human Activity.

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

If disturbance or take of eagles cannot be avoided, an incidental take permit may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the Do I Need A Permit Tool. For assistance making this determination for golden eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

Ensure Your Eagle List is Accurate and Complete
If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

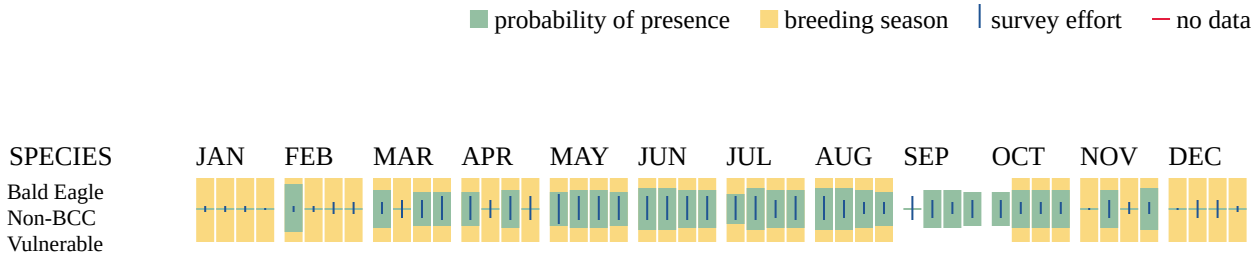
Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service). The incidental take of migratory birds is the injury or death of birds that results from, but is not the purpose, of an activity. The Service interprets the MBTA to prohibit incidental take.

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1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Golden-plover *Pluvialis dominica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10561	Breeds elsewhere
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Aug 31
Black-billed Cuckoo *Coccyzus erythropthalmus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9399	Breeds May 15 to Oct 10
Bobolink *Dolichonyx oryzivorus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9454	Breeds May 20 to Jul 31
Chimney Swift *Chaetura pelagica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Eastern Whip-poor-will *Antrostomus vociferus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10678	Breeds May 1 to Aug 20

NAME	BREEDING SEASON
Grasshopper Sparrow *Ammodramus savannarum perpallidus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8329	Breeds Jun 1 to Aug 20
Henslow's Sparrow *Centronyx henslowii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3941	Breeds May 1 to Aug 31
King Rail *Rallus elegans* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8936	Breeds May 1 to Sep 5
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Pectoral Sandpiper *Calidris melanotos* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere
Prairie Loggerhead Shrike *Lanius ludovicianus excubitorides* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8833	Breeds Feb 1 to Jul 31
Prothonotary Warbler *Protonotaria citrea* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9439	Breeds Apr 1 to Jul 31
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10
Rusty Blackbird *Euphagus carolinus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9478	Breeds elsewhere
Semipalmated Sandpiper *Calidris pusilla* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9603	Breeds elsewhere

NAME	BREEDING SEASON
Short-billed Dowitcher *Limnodromus griseus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Wood Thrush *Hylocichla mustelina* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9431	Breeds May 10 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (▪)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (▪)
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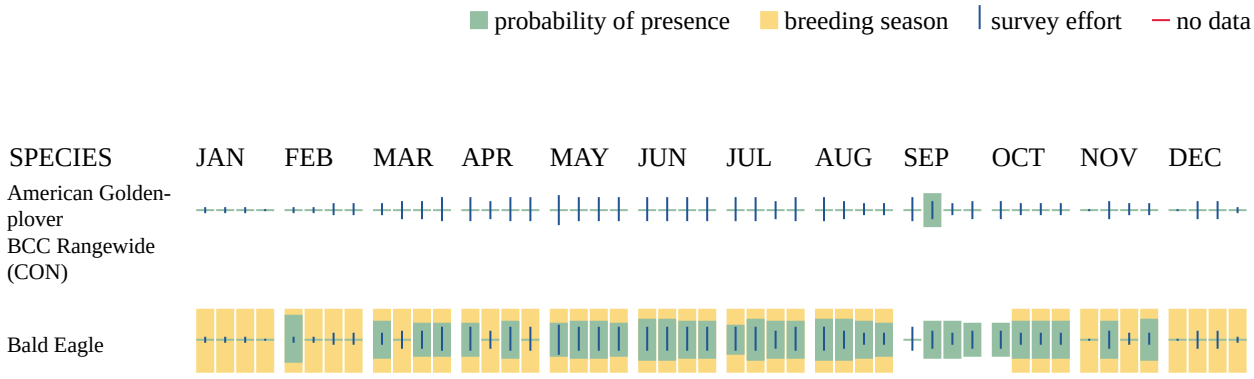
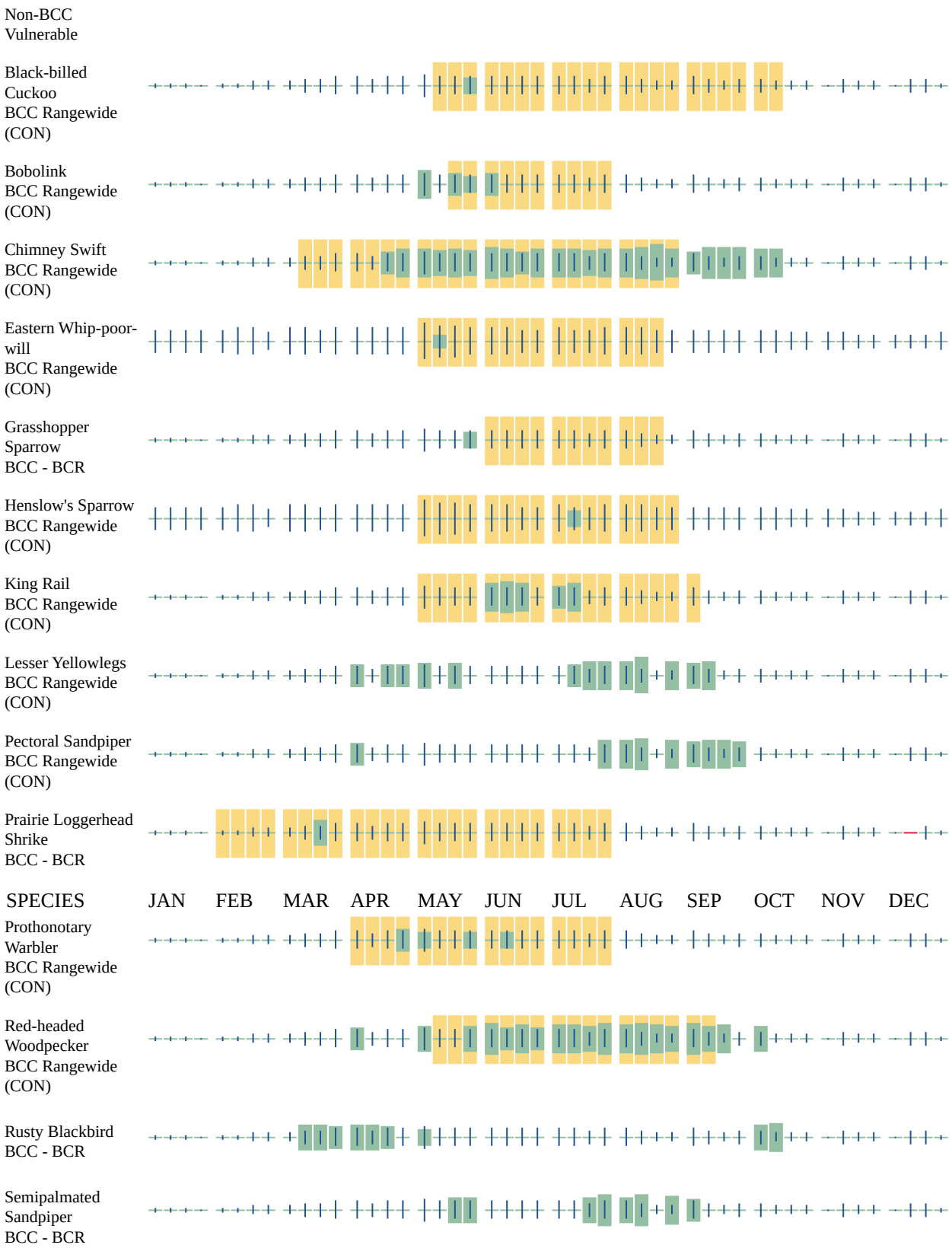
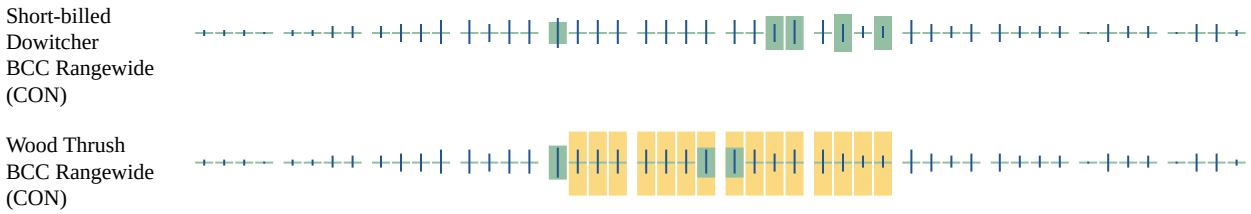



Non-BCC Vulnerable
Black-billed Cuckoo BCC Rangewide (CON)
Bobolink BCC Rangewide (CON)
Chimney Swift BCC Rangewide (CON)
Eastern Whip-poor-will BCC Rangewide (CON)
Grasshopper Sparrow BCC - BCR
Henslow's Sparrow BCC Rangewide (CON)
King Rail BCC Rangewide (CON)
Lesser Yellowlegs BCC Rangewide (CON)
Pectoral Sandpiper BCC Rangewide (CON)
Prairie Loggerhead Shrike BCC - BCR
SPECIES
JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC
Prothonotary Warbler BCC Rangewide (CON)
Red-headed Woodpecker BCC Rangewide (CON)
Rusty Blackbird BCC - BCR
Semipalmated Sandpiper BCC - BCR



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- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER POND

- PABH
- PUBF
- PABHx

RIVERINE

- R2UBHx
- R2UBH
- R2UBFx

FRESHWATER EMERGENT WETLAND

- PEM1F
- PEM5C
- PEM1/5C
- PEM1C

- PEM1A

FRESHWATER FORESTED/SHRUB WETLAND

- PSS1C

IPAC USER CONTACT INFORMATION

Agency:	Army Corps of Engineers
Name:	Andrew Miller
Address:	231 S La Salle St
Address Line 2:	Suite 1500
City:	Chicago
State:	IL
Zip:	60604
Email	andrew.j.miller2@usace.army.mil
Phone:	3128465571

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, CHICAGO DISTRICT
231 SOUTH LASALLE STREET, SUITE 1500
CHICAGO IL 60604

February 13, 2025

Environmental & Cultural Resources Section
Planning Branch

SUBJECT: Federal Consistency Determination for USACE Section 219 Gary/Chicago International Airport Storm and Sanity Sewer Improvement Project, Lake County, Indiana

Jenny Orsburn
Program Manager
Lake Michigan Coastal Program
Indiana Department of Natural Resources
Indiana Dunes State Park Annex Office
1600 North 25 East
Chesterton, IN 46304

Dear Ms. Orsburn:

The U.S. Army Corps of Engineers (USACE), Chicago District proposes to assist the Gary/Chicago International Airport (GCIA) in designing and implementing storm and sanitary sewer system improvements at the GCIA, Lake County, Indiana. The purpose of this undertaking is to address deficiencies in the storm and sanitary sewer systems, including failed or poorly functioning components of the Boeing lift station, deposits and structural deficiencies in storm sewer pipe and structures, and structural deficiencies in sanitary sewer pipe and structures.

PROJECT DESCRIPTION (PROPOSED ACTION)

Storm and sanitary sewer deficiencies would be addressed by repair and rehabilitation of infrastructure (see enclosure), including:

- Removal and replacement of both pumps, controls and control panel, automatic aeration system and controls, and damaged equipment access hatch cover; and addition of a new flow meter structure on the existing 2-inch PVC force main and float-type backup level controls at the Boeing lift station
- Approximately 2,769 linear feet (LF) of cured-in-place-pipe (CIPP) lining, 1,552 LF of heavy cleaning, 733 LF of root cutting in storm sewer pipe
- Cleaning, lid replacement, lid elevation to grade, filter back installation, trash rack installation, or end section replacement at 95 storm sewer structures
- Approximately 350 LF of CIPP lining of sanitary sewer pipe and one point repair of sanitary sewer pipe
- Cleaning interior walls and spraying cementitious lining in two sanitary sewer manholes

Pursuant to Section 7 of the Endangered Species Act of 1973, as amended, USACE queried the U.S. Fish and Wildlife Service Environmental Conservation Online System Information for Planning and Consultation (ECOS-IPaC) on January 16, 2025 to obtain a list of federally listed species and critical habitat that may be present within the project area. Five federally listed threatened, endangered, proposed threatened, or experimental population species were identified through the IPaC query as potentially occurring within the project area, including the Indiana bat (endangered), northern long-eared bat (endangered), piping plover (endangered), whooping crane (experimental population), and monarch butterfly (proposed threatened). No critical habitat was identified in the project area. USACE determined that the Proposed Action will have “No Effect” on these species as they are unlikely to occur in the project area due to the lack of suitable habitat.

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, the U.S. Army Corps of Engineers anticipates that historic properties would not be adversely affected by the recommended plan. Coordination with the Indiana Division of Historic Preservation and Archaeology for agreement with this finding is ongoing and will be completed before the proposed work would begin.

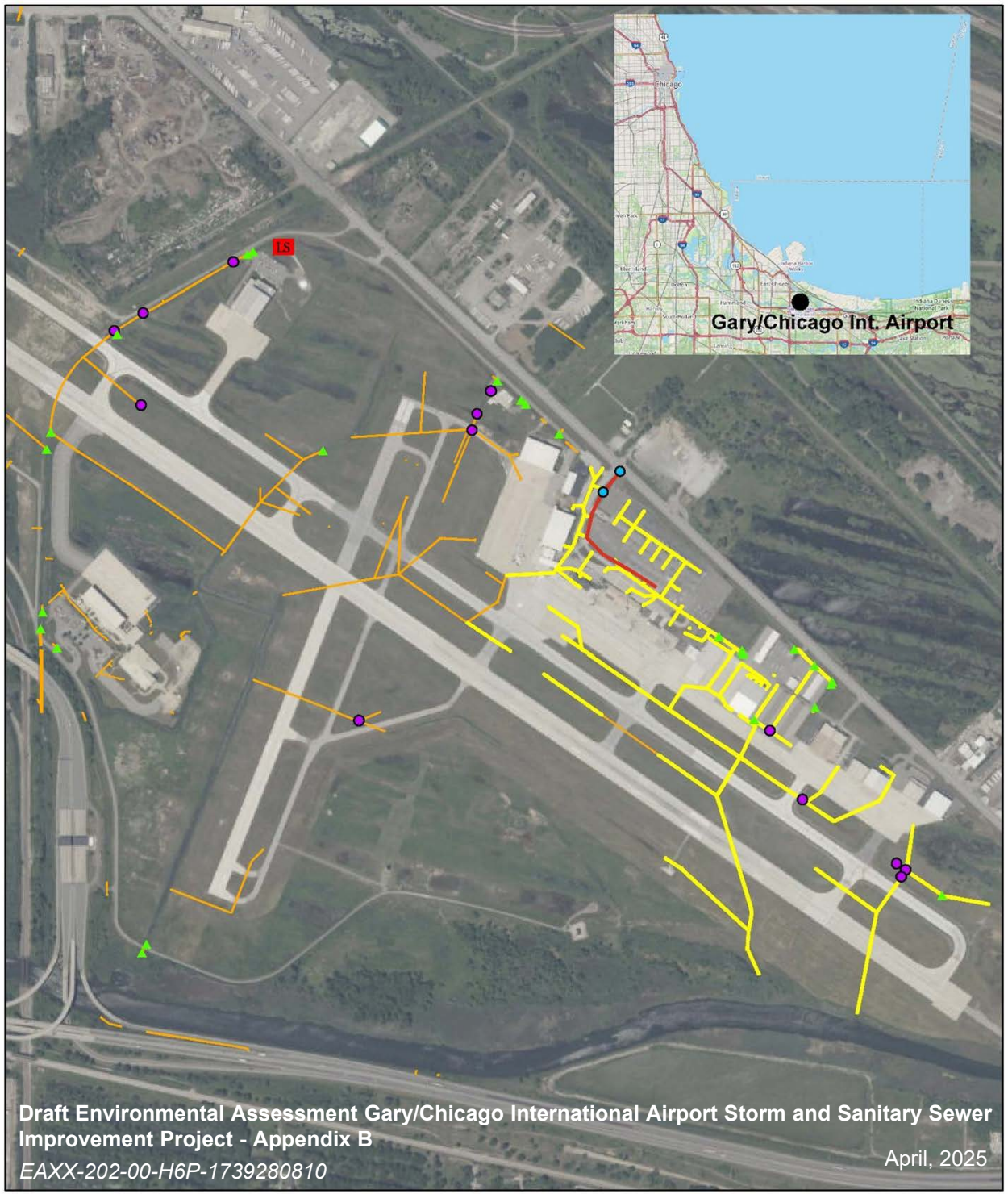
The Proposed Action complies with Indiana's approved coastal management program and will be conducted in a manner consistent with such program. We request your concurrence with this determination within 60 days in accordance with the Coastal Zone Management Act. Indiana’s concurrence will be presumed if its response is not received by USACE within 60 days plus any extension, if requested as applicable pursuant to 15 CFR 940.41(b).

Please contact Andrew Miller at andrew.j.miller2@usace.army.mil or 312-846-5571 if you have any questions or need any additional information regarding the proposed project.

Sincerely,

Alex Hoxsie
Chief, Environmental & Cultural Resources
Planning Branch

ENCLOSURE



Draft Environmental Assessment Gary/Chicago International Airport Storm and Sanitary Sewer Improvement Project - Appendix B

EAXX-202-00-H6P-1739280810

April, 2025

Lift Station Improvement End
End Section Improvements
Manhole Lining
Drainage Inlet Improvements
Storm Sewer Improvements
Storm Sewer Lines
Sanitary Sewer Improvements

Gary Chicago International Airport
Gary, Indiana
1 inch = 825 feet
Chicago District, U.S. Army Corps of Engineers

For Official Use Only
May 2024

Indiana Lake Michigan Coastal Program
DNR Division of Nature Preserves
1600 North 25 East.
Chesterton, IN 46304

February 18th, 2025

Andrew Miller
US Army Corps of Engineers
Planning Branch – Environmental and Cultural Resources Section
231 S LaSalle St. Suite 1500
Chicago, IL 60604

Re: Gary/Chicago International Airport sanitary and storm sewer system improvements (ER-26583)

Dear Andrew,

This letter is regarding the request for a Federal Consistency Determination for the above project in Gary, IN for the renovation and expansion of the Gary/Chicago International Airport sanitary and storm sewer system improvements, including replacement of300' of pipe and lining of 2,400' of pipe, City of Gary in Lake County, IN.

We have found in our final determination that this project is consistent with the laws of the State of Indiana. Please closely review all comments and recommendations included that are provided in the attached Early Coordination/Environmental Assessment letter.

Please note that this determination does not relieve the permit applicant of the requirement to obtain any applicable local, state, or federal permits. Should you have any questions regarding this determination please feel free to contact me via email at jeorsburn@dnr.IN.gov or at (219) 983-9912.

Sincerely,

Jenny Orsburn, Program Manager
Lake Michigan Coastal Program

THIS IS NOT A PERMIT

State of Indiana
DEPARTMENT OF NATURAL RESOURCES
Division of Fish and Wildlife
Early Coordination/Environmental Assessment

DNR#: ER-26583

Request Received: June 4, 2024

Requestor:
Jenny Orsburn
Indiana Department of Natural Resources Lake Michigan Coastal Program
Indiana Dunes State Park
1600 North 25 East
Chesterton, IN 46304

Project:
Gary/Chicago International Airport sanitary and storm sewer system improvements, including replacement of 300' of pipe and lining of 2,400' of pipe, City of Gary
Federal Consistency Review

County/Site Info: Lake County

The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.

If our agency has regulatory jurisdiction over the project, the recommendations contained in this letter may become requirements of any permit issued. If we do not have permitting authority, all recommendations are voluntary.

Regulatory Assessment:
Formal approval by the Department of Natural Resources under the regulatory programs administered by the Division of Water is not required for this project.

Natural Heritage Database:
The Natural Heritage Program's data have been checked. The Division of Nature Preserves recommends confining the project area as much as possible to minimize impacts to the listed flora and communities. The following have been documented within .5 mile of the project area:

Properties
Clark and Pine Nature Preserve
Dupont East Chicago Natural Area
Indiana Tolleston
Pine Station Nature Preserve

Communities
Dry-mesic Sand Prairie
Dry Sand Prairie
Mesic Sand Prairie
Wet-mesic Sand Prairie
Wet Sand Prairie
Dry-mesic Sand Savanna
Dry Sand Savanna

Mesic Sand Savanna
Marsh/Wetland
Panne/Wetland
Pond
Shrub Swamp

Flora
Bluehearts (*Buchnera americana*), State endangered
Clustered Broomrape (*Orobanche fasciculata*), State endangered
Commons' Panic-grass (*Dichanthelium commonsianum*), State endangered
Deam's Panic-grass (*Dichanthelium deamii*), State endangered
Elk Sedge (*Carex garberi*), State endangered
Globe-fruited False-loosestrife (*Ludwigia sphaerocarpa*), State endangered
Hill's Thistle (*Cirsium hillii*), State endangered
Northern White Cedar (*Thuja occidentalis*), State endangered
Running Serviceberry (*Amelanchier humilis*), State endangered
Strict Blue-eyed Grass (*Sisyrinchium montanum*), State endangered
Swink's St. John's-wort (*Hypericum swinkianum*), State endangered
Variegated Horsetail (*Equisetum variegatum var. variegatum*), State endangered
Beach Sumac (*Rhus aromatica var. arenaria*), State threatened
Bearberry (*Arctostaphylos uva-ursi*), State threatened
Brownish Sedge (*Carex brunnescens*), State threatened
Calamint (*Clinopodium arkansanum*), State threatened
Capitate Spike-rush (*Eleocharis geniculata*), State threatened
Crawe's Sedge (*Carex crawei*), State threatened
Ebony Sedge (*Carex eburnea*), State threatened
Fire Cherry (*Prunus pensylvanica*), State threatened
Golden-fruited Sedge (*Carex aurea*), State threatened
Great Plains Ladies'-tresses (*Spiranthes magnicamporum*), State threatened
Hairy Lettuce (*Lactuca hirsuta*), State threatened
Jack Pine (Pinus banksiana), State threatened
Leafy Northern Green Orchid (*Platanthera aquilonis*), State threatened
Michaux's Stitchwort (*Minuartia michauxii var. michauxii*), State threatened
Narrow-leaved Cotton-grass (*Eriophorum angustifolium ssp. angustifolium*), State threatened
Pale False Foxglove (*Agalinis skinneriana*), State threatened
Paper Birch (*Betula papyrifera*), State threatened
Prairie Goldenrod (*Oligoneuron album*), State threatened
Prairie Gray Sedge (*Carex conoidea*), State threatened
Richardson's Sedge (*Carex richardsonii*), State threatened
Rushlike Aster (*Symphyotrichum boreale*), State threatened
Scirpus-like Rush (*Juncus scirpoides*), State threatened
Small Yellow Lady's-slipper (*Cypripedium parviflorum var. makasin*), State threatened
Spotted Pondweed (*Potamogeton pulcher*), State threatened
Sticky Goldenrod (*Solidago simplex var. gillmanii*), State threatened
Western Silvery Aster (*Symphyotrichum sericeum*), State threatened
Yellow Gentian (*Gentiana alba*), State threatened

Birds
Migratory Bird Concentration Area
American Bittern (*Botaurus lentiginosus*), State endangered
Black-crowned Night-heron (*Nycticorax nycticorax*), State endangered
Black Tern (*Chlidonias niger*), State endangered
King Rail (*Rallus elegans*), State endangered
Least Bittern (*Ixobrychus exilis*), State endangered
Marsh Wren (*Cistothorus palustris*), State endangered
Upland Sandpiper (*Bartramia longicauda*), State endangered

Virginia Rail (*Rallus limicola*), State endangered
Common Gallinule (*Gallinula galeata*), State endangered
Common Nighthawk (*Chordeiles minor*), State special concern
Sandhill Crane (*Antigone canadensis*), State special concern

Reptiles and Amphibians
Blanding's Turtle (*Emydoidea blandingii*), State endangered
Eastern Massasauga (*Sistrurus catenatus*), State endangered
Spotted Turtle (*Clemmys guttata*), State endangered
Blanchard's Cricket Frog (*Acris blanchardi*), State special concern
Blue-spotted Salamander (*Ambystoma laterale*), State special concern
Western Ribbon Snake (*Thamnophis proximus proximus*), State special concern

Mammals
Frankling's Ground Squirrel (*Poliocitellus franklinii*), State endangered

Invertebrate Fauna
Blazingstar Flower Moth (*Schinia sanguinea*), State endangered
Ernestine's phytometra (*Phytometra ernestinana*), State endangered
Obtuse Sedge Borer (*Oligia obtusa*), State endangered
Ottoe Skipper (*Hesperia ottoe*), State endangered
Spotted-wing Grasshopper (*Orphulella pelidna*), State endangered
The Kansas Prairie Leafhopper (*Prairiana kansana*), State endangered
Atlantic Spastic Grasshopper (*Paroxya atlantica*), State threatened
Beer's Blazing Star Borer Moth (*Papaipema beeriana*), State threatened
Black-dashed Apamea (*Apamea nigrior*), State threatened
Buff-edge Quaker (*Dargida rubripennis*), State threatened
Bunchgrass Skipper (*Problema byssus*), State threatened
Burgess' Apamea (*Apamea burgessi*), State threatened
Columbine Borer Moth (*Papaipema leucostigma*), State threatened
Curved Halter Moth (*Capis curvata*), State threatened
False-foxglove Sun Moth (*Pyrrhia aurantiago*), State threatened
Fringed Dart (*Eucoptocnemis fimbriaris*), State threatened
Gemmed Cordgrass Borer (*Peoria gemmatella*), State threatened
Grote's Black-tipped Quaker (*Dichagyris grotei*), State threatened
Helpless Photedes (*Photedes inops*), State threatened
Large-headed Grasshopper (*Phoetaliotes nebrascensis*), State threatened
Newman's Brocade (*Meropleon ambifusca*), State threatened
Northern Flower Moth (*Schinia septentrionalis*), State threatened
Parallel-striped Spittlebug (*Paraphilaenus parallelus*), State threatened
Red Sedge Borer Moth (*Capsula laeta*), State threatened
Royal Fern Borer Moth (*Papaipema speciosissima*), State threatened
Snakeweed Grasshopper (*Hesperotettix viridis pratensis*), State threatened
Sprague's Pygartic (*Pygarctia spraguei*), State threatened
The Long-nose Three-awn Leafhopper (*Flexamia pyrops*), State threatened
Unarmed Wainscot (*Leucania inermis*), State threatened
Unexpected Tiger Moth (*Cycnia collaris*), State threatened
Band-winged Meadowhawk (*Sympetrum semicinctum*), State rare
Bison Limotettix Leafhopper (*Limotettix bisoni*), State rare
DeLong's Flexamia Leafhopper (*Flexamia delongi*), State rare
Dorsal-striped Elephant Hopper (*Bruchomorpha dorsata*), State rare
Dusted Skipper (*Atrytonopsis hianna*), State rare
Figured Grammia (*Grammia figurata*), State rare
Fingered Lemmeria (*Lemmeria digitalis*), State rare
Forked Grass-veneer moth (*Crambus bidens*), State rare
Great Lakes Dune Spittlebug (*Philaenarcys killa*), State rare

Huckleberry Spur-throat Grasshopper (*Melanoplus fasciatus*), State rare
Indiangrass Flexamia (*Flexamia reflexus*), State rare
Kansas Spikerush Leafhopper (*Dorydiella kansana*), State rare
Keeler's Spur-throated Grasshopper (*Melanoplus keeleri luridus*), State rare
Large Hypenodes (*Hypenodes caducus*), State rare
Leonard's Skipper (*Hesperia leonardus*), State rare
Little Bluestem Polyamia (*Polyamia caperata*), State rare
Lobed Paraphlepsius Leafhopper (*Paraphlepsius lobatus*), State rare
Louisiana Macrochilo (*Macrochilo louisiana*), State rare
Major Shovelhead Leafhopper (*Hecalus major*), State rare
Merry Melipotis (*Melipotis jucunda*), State rare
New Jersey Tea Leaf-tier (*Ancylis semiovana*), State rare
Northern Chlorotettix Leafhopper (*Chlorotettix borealis*), State rare
Northern Sedge Borer (*Photedes panatela*), State rare
Olivaceous Eucosma (*Eucosma olivaceana*), State rare
Orange-winged Grasshopper (*Pardalophora phoenicoptera*), State rare
Prairie Meadow Katydid (*Conocephalus saltans*), State rare
Record Keeper (*Feltia manifesta*), State rare
Red-banded Switchgrass Leafhopper (*Graminella aureovittata*), State rare
Red-legged Spittle Bug (*Prosapia ignipectus*), State rare
Reed-boring Crambid (*Carectocultus perstrialis*), State rare
Salt Marsh Wainscot (*Leucania amygdalina*), State rare
Sand Locust (*Psinidia fenestralis*), State rare
Saturn Quaker (*Protorthodes incincta*), State rare
Short-headed Limotettix Leafhopper (*Limotettix truncatus*), State rare
Smokey Prairie Dock Borer (*Sonia fulminana*), State rare
Smoky-striped Eucosma (*Eucosma umbrastriana*), State rare
Starry Campion Capsule Moth (*Hadena capsularis*), State rare
The Long-nosed Elephant Hopper (*Bruchomorpha extensa*), State rare
Two-striped Perforated Leafhopper (*Cribrus shingwauki*), State rare
Yellow-striped Angle (*Digrammia mellistrigata*), State rare
White-eyed Sedge-borer (*Iodopepla u-album*), State rare

Fish and Wildlife Comments:
Avoid and minimize impacts to fish, wildlife, and botanical resources to the greatest extent possible, and compensate for impacts. The following are recommendations that address potential impacts identified in the proposed project area:

A) Heritage Species
The Division of Fish and Wildlife does not anticipate any significant impacts to the Migratory Bird Concentration Area or listed bird species due to this project.

The main areas of concern for the listed reptile and amphibian species are the places where excavation/heavy machinery work is planned for storm sewer improvements that approach or enter the wetland areas south of the runway and on the far east end. To minimize impacts to these species, visually inspect the area for turtles, snakes, frogs, and salamanders daily where heavy machinery work, including excavation, is being conducted in the area. Any open trenches should be visually inspected before backfilling and any reptiles and amphibians should be safely relocated to an adjacent wetland on site.

The proposed project is within proximity to known Franklin's Ground Squirrel populations. While the project footprint is within an active and managed area outside of the most suitable habitat for this species, it is within the dispersal distance of adult and juvenile Franklin's Ground Squirrels. Many of the areas occupied by Franklin's Ground Squirrels include rights-of-way, parks, and vacant lots as these areas are managed in a manner that unintentionally replicates their preferred prairie habitat. Given the project's proximity to the species and available habitat, there is moderate concern for the project's impact on the species.

- To best avoid take of Franklin's Ground Squirrels during this project, avoid disturbing nonpaved-over soil between June-August. This is a critical time for pregnant females or those that may have just given birth. Once the soil is disturbed, however, it is unlikely that the species would stay in the immediate disturbed area.
- Unless total excavation of the pipelines is required, the best way to minimize impact to Franklin's Ground Squirrels is to reduce the amount of disturbed ground.
- Given the proximity to known populations it is imperative that any take of Franklin's Ground Squirrels be reported so specimens can be collected and included in ongoing research projects. Please report take of the species to DNR Mammologist Brad Westrich (bwestrich@dnr.in.gov, 812-822-3401) or DNR Law Enforcement.

B) Riparian Habitat

We recommend a mitigation plan be developed (and submitted with the permit application, if required) for any unavoidable habitat impacts that will occur. The DNR's Habitat Mitigation Guidelines (and plant lists) can be found online at: https://www.in.gov/nrc/files/IB-17.pdf.

Impacts to non-wetland forest of one (1) acre or more in a rural or urban area should be mitigated at a minimum 2:1 ratio based on area of impact. Impacts to non-wetland forest under one (1) acre but at least 0.10 acre in a rural or urban area should be mitigated at a minimum 1:1 ratio based on area of impact. Impacts under 0.10 acre in a rural area typically do not require mitigation or additional plantings beyond seeding and stabilizing disturbed areas, though there are exceptions for high quality habitat sites. Impacts under 0.10 acre in an urban area should be mitigated by replacing trees that are 10" diameter-at-breast height (dbh) or greater by planting five trees, 1" to 2" in dbh, for each tree which is removed that is 10" dbh or greater. Seeding and stabilizing disturbed areas is required regardless of the impact amount and location. If floodway impacts to forested wetland and non-wetland habitat areas combine to be 0.10 acres or more, mitigation should be done and coordinated with the biologist, as needed.

The mitigation site should be located in the floodway, downstream of the one (1) square mile drainage area of that stream (or another stream within the 8-digit HUC, preferably as close to the impact site as possible) and adjacent to existing forested riparian habitat.

C) Wetlands

Due to the presence or potential presence of wetland habitat on site, we recommend contacting and coordinating with the Indiana Department of Environmental Management (IDEM) 401 program and the US Army Corps of Engineers (USACE) 404 program.

D) Dune and Swale Habitat

Due to the presence or potential presence of dune and swale features, minimizing project footprint is a priority. Examples of impact minimization include utilizing previously disturbed land such as roadway right-of-way, minimizing removal of fish and wildlife resources, and minimizing excavation. Disturbed habitat should be restored immediately upon project conclusion and be of the same or better quality. Revegetation should include species endemic to northwestern Indiana and the dunes region as opposed to generic seed mixes.

The additional measures listed below should be implemented to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources:

1. Revegetate all bare and disturbed areas that are not currently mowed and maintained with a mixture of grasses, sedges, and wildflowers native to Northern Indiana's dune region and specifically for stream bank/floodway stabilization purposes as soon as possible upon completion; turf-type grasses (including low-endophyte, friendly endophyte, and endophyte free tall fescue but excluding all other varieties of tall fescue) may be used in currently mowed areas only. A native herbaceous seed mixture must include at least 5 species of grasses and sedges and 5 species of wildflowers.
2. Minimize and contain within the project limits inchannel disturbance and the clearing of trees and brush.
3. Do not work in the waterway from April 1 through June 30 without the prior written approval of the Division of Fish and Wildlife.

4. Do not cut any trees suitable for Indiana Bat or Northern Long-eared Bat roosting (3 inches or greater diameter-at-breast height, living or dead, with loose hanging bark, or with cracks, crevices, or cavities) from April 1 through September 30.
5. Use minimum average 6-inch graded riprap stone extended below the normal water level to provide habitat for aquatic organisms in the voids.
6. Do not use broken concrete as riprap.
7. Underlay the riprap with a bedding layer of well graded aggregate or a geotextile to prevent piping of soil underneath the riprap.
8. All excavated material must be properly spread or completely removed from the project site such that erosion and off-site sedimentation of the material is prevented.
9. Minimize the movement of resuspended bottom sediment from the immediate project area.
10. Do not deposit or allow construction/demolition materials or debris to fall or otherwise enter the waterway. Any incidental fallen material or debris in the waterway must be removed within 24 hours using best management practices, particularly lifting material out of the waterway and not dragging it across the streambed whenever possible.
11. Appropriately designed measures for controlling erosion and sediment must be implemented to prevent sediment from entering the waterbody or leaving the construction site; maintain these measures until construction is complete and all disturbed areas are stabilized.
12. Seed and protect all disturbed streambanks and slopes not protected by other methods that are 3:1 or steeper with erosion control blankets that are heavy-duty, biodegradable, and net free or that use loose-woven / Leno-woven netting to minimize the entrapment and snaring of small-bodied wildlife such as snakes and turtles (follow manufacturer's recommendations for selection and installation); seed and apply mulch on all other disturbed areas.
13. Protect the area around and below any concentrated discharge points, down to the waterway's normal flow level, with an appropriate structural armament such as riprap.
14. Do not excavate or place fill in any riparian wetland.

Contact Staff:
Our agency appreciates this opportunity to be of service. Please contact me at RVanVoorhis@dnr.IN.gov or (317) 232-8163 if we can be of further assistance.

Rachel Van Voorhis **Date:** July 3, 2024
Rachel Van Voorhis
Environmental Coordinator
Division of Fish and Wildlife

US Army Corps of Engineers®

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Appendix C – Draft EA Distribution List

Draft Environmental Assessment Gary/Chicago International Airport Storm and Sanitary Sewer Improvement Project

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1. PURPOSE AND NEED

1.1. Purpose

The U.S. Army Corps of Engineers (USACE), Chicago District is evaluating its decision to support the Gary/Chicago International Airport (GCIA) in rehabilitating its storm and sanitary sewer infrastructure by providing planning and construction assistance for the proposed project.

1.2. Need for Action

Recent field inspections identified multiple deficiencies in the storm sewer and sanitary sewer infrastructure at the GCIA. These deficiencies include:

Boeing Lift Station

- Lift station control panel failures resulting in continual pump operation in low wet well level conditions
- Damaged lift station hatch cover that prevents complete closure
- Non-existent backup level control system.
- Non-function aeration system for odor control

Storm Sewer System

- Encrustations, settled deposits, offset joints, cracks/fractures, root intrusion, and groundwater infiltration in storm sewer pipe
- Storm sewer structures with broken or corroded frames and lids, broken end sections, debris accumulation at inlets and outlets

Sanitary Sewer System

- Offset joints, cracks/fractures, roots, and pipe breaks in sanitary sewer pipe
- Cracked manhole structures with groundwater infiltration

If left unaddressed, these deficiencies leave the GCIA at risk of storm and sanitary sewer backups and overflows and costly emergency repairs and replacements which could impact airport operations, adjacent properties, and environmental resources.

1.3. Authority

The study is authorized under Section 219(f)(12) of the Water Resources Development Act (WRDA) of 1992, Public Law (P.L.) 102-580; as amended by Section 502(b) of the WRDA of 1999, Public Law 106-53; Section 145 of the Energy and Water Appropriations Act of 2004, Public Law 108-137; Section 5057 of the WRDA of 2007, Public Law 110-114; Section 1157 of the Water Infrastructure Improvements for the Nation Act (WIIN Act) of 2016, Public Law 114-322. These amended authorities allow USACE to provide planning, design, and construction assistance for water-related environmental infrastructure projects.

1.4. Local Sponsor

The project's non-federal sponsor is the GCIA, located in Gary, Lake County, Indiana.

2. ALTERNATIVES, INCLUDING THE RECOMMENDED PLAN

2.1. List of Alternatives

Three alternatives were initially considered to address multiple deficiencies in the existing storm and sanitary sewer infrastructure as described in Section 1.2 above. These alternatives include:

- **No Action Alternative** – Under this alternative, storm sewer and sanitary sewer replacement or rehabilitation would not occur. The existing infrastructure would continue to degrade for the service area resulting in storm and sanitary backups and overflows and costly emergency repairs and replacement projects.

- **Alternative 1: Replacement** – Under this alternative, storm and sanitary sewer deficiencies would be addressed by full replacement of deficient infrastructure. This includes:
    - Construction of a full duplex lift station including wet well structure, pumps, piping (35 linear feet [LF] of 8-inch PVC gravity sewer and 82 LF of 2-inch PVC force main), valves, aerations systems, controls, and flow meter structure at the Boeing facility.
    - 4,660 LF of storm sewer pipe removal and replacement through open-cut methods
    - 38 storm sewer structure replacements through open-cut methods
    - 661 LF of sanitary sewer pipe removal and replacement through open-cut methods
    - Two sanitary sewer manhole structure replacements

- **Alternative 2: Rehabilitation** – Under this alternative, storm and sanitary sewer deficiencies would be addressed by repair and rehabilitation of deficient infrastructure. This includes:
    - Removal and replacement of both pumps, controls and control panel, automatic aeration system and controls, and damaged equipment access hatch cover as well as addition of a new flow meter structure on the existing 2-inch PVC force main and float-type backup level controls at the Boeing lift station
    - Approximately 2,769 LF of cured-in-place-pipe (CIPP) lining, 1,552 LF of heavy cleaning, 733 LF of root cutting of storm sewer pipe
    - Cleaning, lid replacement, lid elevation to grade, filter bag installation, trash rack installation, or end section replacement at 95 storm sewer structures
    - Approximately 350 LF of CIPP lining of sanitary sewer pipe and one point repair of sanitary sewer pipe
    - Cleaning interior walls and spraying cementitious lining in two sanitary sewer manholes

2.2. Recommended Plan (Proposed Action)

The recommended plan is Alternative 2 as shown in Figure 1. Alternative 2 would include rehabilitation to the Boeing lift station; storm sewer CIPP lining, cleaning, and root cutting; storm sewer structure cleaning and repair; and sanitary sewer CIPP lining, point repair, and manhole lining. Alternative 2 would address the deficiencies to the GCIA storm and sanitary sewer system described in Section 1.2. The proposed work would begin in fall 2025 with completion anticipated in fall 2026.

The No Action Alternative would not repair or rehabilitate the defects and deficiencies identified in the storm and sanitary sewer infrastructure at the GCIA. If left unaddressed, these deficiencies leave the GCIA at risk of storm and sanitary sewer backups and overflows and costly emergency repairs and replacements which could have impacts to airport operations, adjacent properties, and environmental resources.

Alternative 1 would require higher construction costs which could limit the number of storm and sanitary sewer defects that could be addressed. As discussed, leaving deficiencies unaddressed could impact airport operations, adjacent properties, and environmental resources.

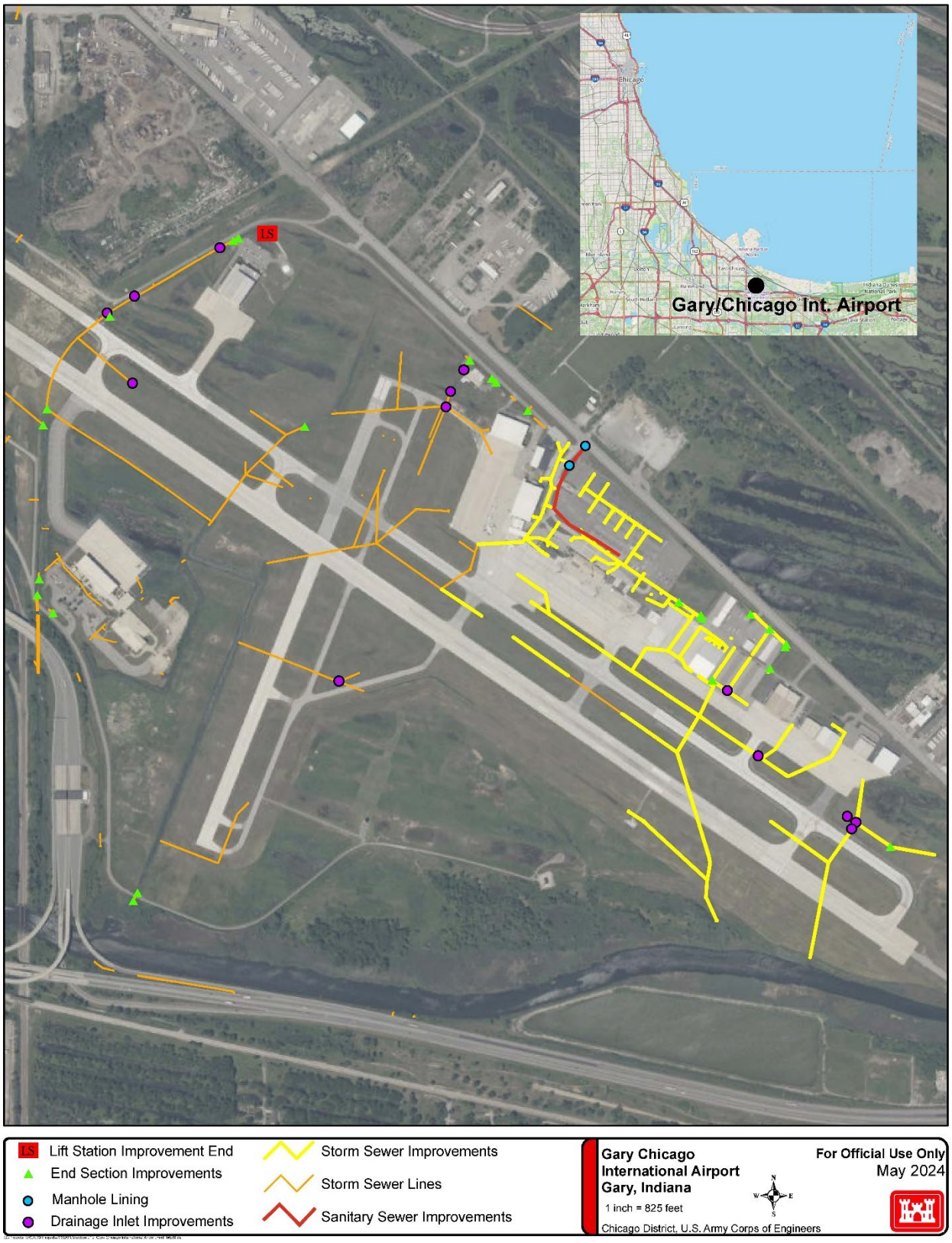

Figure 1: Project location map

3. EXISTING CONDITIONS AND ALTERNATIVE IMPACTS

3.1. Level of Environmental Impact Significance

This section discusses the existing conditions by resource category and any potential environmental impacts associated with the No Action Alternative as well as with implementation of Alternative 1 or Alternative 2.

USACE evaluated the potentially affected environment and the degree of effects to consider whether the Proposed Action's effects are significant. In considering the potentially affected environment, USACE considered the affected area and its resources. USACE defined effects or impacts to mean changes to the human environment from the Proposed Action or alternatives that are reasonably foreseeable. In considering the degree of the effects, USACE considered short-term and long-term effects; beneficial and adverse effects; any effects to public health and safety; and whether the action threatens to violate federal, state, or local laws established for the protection of the human and natural environment. USACE considered the severity of an environmental impact as follows:

- None/negligible – No measurable impacts are expected to occur.
- Minor – A measurable and adverse effect to a resource. A slight impact that may not be readily obvious and is within accepted levels for permitting, continued resource sustainability, or human use. Impacts should be avoided and minimized if possible but should not result in a mitigation requirement.
- Significant – A measurable and adverse effect to a resource. A major impact that is readily obvious and is not within accepted levels for permitting, continued resource sustainability, or human use. Impacts likely result in the need for mitigation.
- Adverse – A measurable and negative effect to a resource. May be minor to major, resulting in reduced conditions, sustainability, or viability of the resource.
- Beneficial – A measurable and positive effect to a resource. May be minor to major, resulting in improved conditions, sustainability, or viability of the resource.
- Short-Term – Temporary in nature and does not result in a permanent long-term beneficial or adverse effect to a resource. For example, temporary construction-related effects (such as, an increase in dust, noise, traffic congestion) that no longer occur once construction is complete. May be minor, significant, adverse or beneficial in nature.
- Long-Term – Permanent (or for most of the project life) beneficial or adverse effects to a resource. For example, permanent conversion of a wetland to a parking lot. May be minor, significant, adverse or beneficial in nature.

USACE used quantitative and qualitative analyses, as appropriate, to determine the level of potential impacts from proposed alternatives. USACE analyzed ecological, aesthetic, historic, cultural, economic, social, and health effects, as applicable. Based on the results of the analyses, this Draft Environmental Assessment (EA) identifies whether a particular potential impact would be adverse or beneficial, and to what extent.

3.2. Project Area

The project area is within the GCIA, Lake County, Indiana (Figure 1).

3.3. Alternative Impacts

This chapter discusses the existing conditions by resource category and any potential environmental impacts associated with implementation of Alternative 1 and Alternative 2 and the No Action Alternative.

3.4. Physical Resources

3.4.1. Climate

Existing Condition

The climate of the study area is predominantly continental with some modification by Lake Michigan. The National Oceanic and Atmospheric Administration's (NOAA) Online Weather Data (NOWData) was queried for monthly and annual average temperatures and precipitation (Table 1). The closest station to the GCIA in the NOWData web portal is located in the Park Forest, Illinois area, located approximately 16 miles southwest of the GCIA. The mean average annual temperature is 49.8 °F, with a mean maximum and minimum of 59.3 °F and 40.3°F, respectively. Average yearly precipitation between 1991 and 2020 is 42.10 inches.

Table 1: Temperatures and precipitation for the Park Forest area (NOAA, 2025)

Month	Total Precipitation Normal (inches)	Mean Max Temperature Normal (°F)	Mean Min Temperature Normal (°F)	Mean Avg Temperature Normal (°F)
January	2.49	31.1	15.2	23.2
February	2.15	35.2	18.4	26.8
March	2.65	46.4	28.1	37.2
April	4.02	59.3	38.3	48.8
May	4.57	70.6	49.3	60.0
June	4.91	80.2	58.9	69.5
July	4.73	83.9	63.8	73.9
August	4.02	82.0	62.0	72.0
September	3.44	75.8	54.6	65.2
October	3.65	63.1	42.4	52.8
November	3.00	48.2	31.4	39.8
December	2.47	36.3	21.5	28.9
Annual	42.10	59.3	40.3	49.8

Alternative Impacts

Construction of either Alternative 1 or Alternative 2 would have no short-term or long-term impacts to climate or future conditions.

No impacts to climate or future conditions are expected under the No Action Alternative.

3.4.2. Geology & Soils

Existing Condition

Geology – Glaciation in northern Indiana ended about 13,000 years ago when the glaciers receded from the area for the last time. In northwest Indiana the most common type of bedrock is a magnesium-rich limestone called dolomite that was originally deposited on reefs set in shallow seas during the Silurian period about 400 million years ago. The youngest bedrock in northwest Indiana dates from the Pennsylvania period about 300 million years ago. Surface features in the region are all made of material deposited by the glaciers or by the lakes that appeared as the glaciers melted. In some places, these deposits are nearly 400 feet thick.

Soils – The U.S. Department of Agriculture Natural Resource Conservation Service's web soil survey was queried for soils present within the project areas. According to the web soil survey for the project area, the soil type present is predominantly urban land with limited Oakville-Adrian complex present (USDA, 2025). No prime or unique soils are present in the project area.

Alternative Impacts

Both Alternative 1 and Alternative 2 would involve excavation and ground disturbance during construction, though excavation and ground disturbance would be significantly reduced under Alternative 2. Excavation would occur in previously disturbed soils as the project area has been previously disturbed from airport construction. No unique local geologic features are present within the project area and soils within the project area can be found throughout the region. Therefore, neither Alternative 1 nor Alternative 2 would have any short-term or long-term adverse impacts to local geological features or soils.

No impacts to geology and soils would be expected under the No Action Alternative.

3.4.3. Water Resources

Existing Condition

The GCIA in Lake County, Indiana is located above the Silurian and Devonian Carbonates Aquifer System, the principal bedrock aquifer in the northern extent of the county (Indiana Department of Natural Resources [IDNR], 2010a). In most areas, the aquifer is overlain with approximately 50 to 200 feet of unconsolidated material. There are no registered significant groundwater withdrawal facilities in this system (IDNR, 2010a). The Calumet Aquifer System overlies the bedrock and consists of fine- to medium-grained sand with dispersed lenses of gravel (IDNR, 2010b). Areas of subdued relief in the northern portion of Lake County have static water levels that are frequently less than 15 feet below the surface. The Calumet Aquifer System has not been developed significantly to the abundant surface-water in Lake Michigan and the aquifer's susceptibility to surface contamination due to the absence of a clay cap and

separator beds (IDNR, 2010b). The primary use of groundwater in the aquifer is industrial (IDNR, 2010b).

The GCIA is located between the Grand Calumet River and Lake Michigan, though runoff from the GCIA property drains towards the Grand Calumet River either directly or through drainage channels adjacent to the GCIA. Water quality in the Grand Calumet River is listed as impaired due to *E. coli*, PCBs in fish tissue, biological integrity, oil and grease, nutrients, free cyanide, and ammonia (Indiana Department of Environmental Management, 2024b). There are wetlands present on the GCIA property as identified by U.S. Fish and Wildlife Service's (USFWS) National Wetland Inventory (Figure 2) and through wetland delineations of the GCIA property (Figure 4; GCIA, 2020). Wetlands on the GCIA property are primarily freshwater emergent and freshwater forested/shrub wetlands (GCIA, 2020). Portions of the southern extent of the GCIA property are located within the 100-year floodplain and the regulatory floodway of the Grand Calumet River (FEMA, 2025).

Figure 2: USFWS National Wetland Inventory map of aquatic resources in project area

Alternative Impacts

Construction of Alternative 1 would involve earth disturbance associated with the full replacement of storm and sanitary sewer pipe and structures through open cut methods. While most water resources are not collocated with storm and sanitary sewers, there are limited areas where the storm sewer infrastructure is within close proximity to delineated wetlands. This would result in minor short-term adverse impacts to any aquatic communities present within the project area. Appropriate erosion and sedimentation controls would be implemented to prevent water quality impacts to adjacent water resources during construction.

Alternative 2 would result in the rehabilitation of existing storm sewer and sanitary sewer infrastructure and no expansion or substantiative change to these systems. Under Alternative 2, project activities would occur outside of delineated water resources at the GCIA (e.g., emergent freshwater wetlands) and no excavation or fill placement would occur. Appropriate erosion and sedimentation controls would be implemented to prevent water quality impacts to these adjacent resources during construction. Therefore, the Proposed Action would comply with Executive Order 11990 (Protection of Wetlands) and the Clean Water Act. Section 10 of the Rivers and Harbors Act of 1899 does not apply because the project does not include construction of any structure in or over any navigable waters. There would be no short-term or long-term impacts to water resources from implementation of Alternative 2.

The southern portion of the project limits are located within a floodway and floodplain associated with the Grand Calumet River (Figure 3).

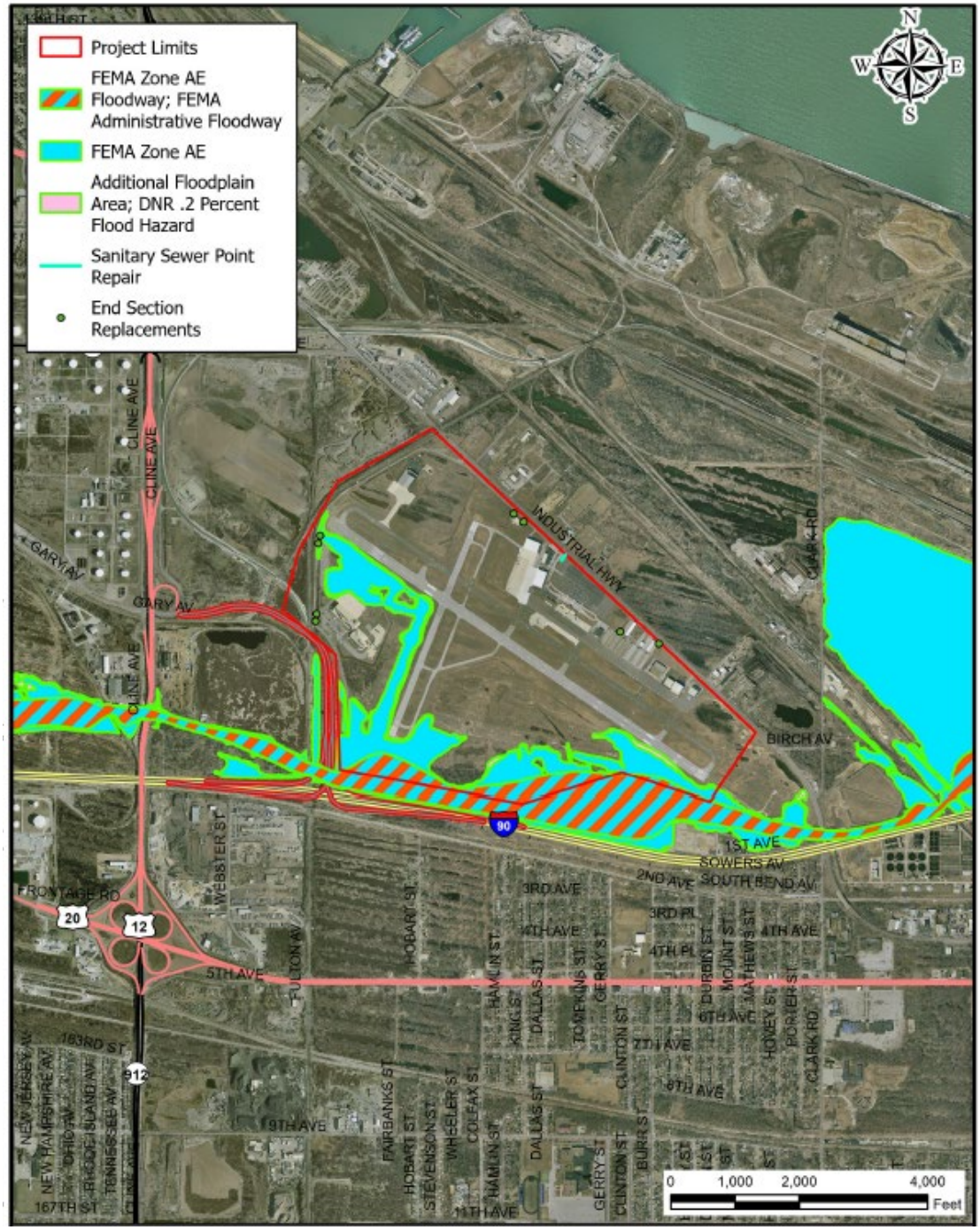

Figure 3: Floodplain and floodway map of project area

The proposed work in the 100-year floodplain under Alternative 1 or Alternative 2 would be an in-kind replacement or rehabilitation of the storm sewer system and would not adversely impact or promote development within the floodplain. Construction would not occur within the regulatory floodway. Therefore, both Alternative 1 (Proposed Action) and Alternative 2 are consistent with Executive Order 11988 (Floodplain Management).

The No Action Alternative would have minor impacts to water resources due to water quality adverse water quality effects of storm and sanitary sewer back-ups and overflows.

3.4.4. Air Quality

Existing Condition

Air quality in the project area is typical of a populated urban area outside of a major metropolitan city as shown by the U.S. Environmental Protection Agency's (USEPA) Air Quality Index (AQI). Most of the impacts to air quality in this area are due to the large number of cars and trucks driven on the extensive road system in this region and from the GCIA itself. Additionally, the Clean Air Act requires the USEPA to set national ambient air quality standards (NAAQS) for six criteria pollutants (carbon monoxide, lead, nitrogen dioxide, particulate matter, ozone, and sulfur oxides) which are considered harmful to public health and the environment (Table 2). Areas not meeting the NAAQS for one or more of the criteria pollutants are designated as "nonattainment" areas by the USEPA. A portion of Lake County, IN that includes the project area is classified as nonattainment for 8-hour ozone (2015), categorized as serious (USEPA, 2025). All of Lake County is in maintenance status for 8-hour ozone (2008) (USEPA, 2025) and portions of Lake County that include the project area are in maintenance status for PM-10 (1987) and Sulfur Dioxide (1971) (USEPA, 2025). A portion of Lake County adjacent to but not including the project area is in maintenance status for Carbon Monoxide (1971) (USEPA, 2025).

Table 2: Lake County, IN status for NAAQS criteria pollutants (USEPA, 2025)

NAAQS	Area Name	Most Recent Year of Nonattainment	Current Status	Classification	Whole or Part of County
8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI	2021	Maintenance (since 2022)	Serious	Whole
8-Hour Ozone (2015)	Chicago, IL-IN-WI	2025	-	Serious	Part*
Carbon Monoxide (1971)	East Chicago, IN	1999	Maintenance (since 2020)	Not Classified	Part**
PM-10 (1987)	Lake County; Cities of East Chicago, Hammond, Whiting, and Gary, IN	2002	Maintenance (since 2003)	Moderate	Part*
Sulfur Dioxide (1971)	Lake County, IN	2004	Maintenance (since 2005)	-	Part*

* Part of Lake County designated as nonattainment or in maintenance status includes the project area.
** Part of Lake County under designated as nonattainment or in maintenance status does not include the project area.

The State of Indiana aims to reduce GHG emissions by 28.4 million metric tons of carbon dioxide equivalents (MMT CO_2e) by 2030 and 98.9 MMT CO_2e by 2050 (IDEM, 2024a). The USEPA's Mandatory Reporting Rule of Greenhouse Gases (MRR-GHG) applies to direct GHG emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject carbon dioxide (CO_2) underground for sequestration (containment) or other reasons.

Alternative Impacts

The project area in Lake County, Indiana is currently within a non-attainment area for one of the criteria pollutants for which standards have been established in the NAAQS, 8-hour ozone (2015). During implementation of Alternative 1 or Alternative 2, construction equipment would cause negligible, temporary air quality impacts. All equipment used would be compliant with current air quality control requirements for diesel exhaust, fuels, and similar requirements. Long-term, once constructed, the project would be neutral in terms of air quality, with no features that either emit or sequester air pollutants or greenhouse gases to a large degree. Therefore, construction of Alternative 1 or Alternative 2 would have a negligible short-term impact and no long-term adverse impacts on air quality within Lake County. Due to the short and temporary nature of any air quality impacts, a general conformity analysis was not conducted.

USACE analyzed GHG emissions under Alternative 1 and Alternative 2. Construction of Alternative 1 would take approximately two months with the average working day lasting eight hours; Alternative 2 would take approximately one month with an eight-hour working day (see Appendix A for machinery and vehicle usage estimates for Alternative 1 and Alternative 2). Table 3 provides the total amount of GHG emissions that are expected to result from construction for each alternative. Emissions were calculated using the Fuel Volume Analysis Method Calculator (Air Quality and GHG Sub-CoP SOP). The Fuel Volume Emissions Method is used for projects with low to intermediate emissions anticipated and makes assumptions to simplify the quantification of emissions. This model assumed 25 gallons of fuel/hour and all equipment fuel to be Distillate Fuel Oil No.2 (diesel). Emissions Factors were acquired from the USEPA Emission Factors for Greenhouse Gas Inventories. To determine the sum of total GHG emissions, the emissions for each type of GHG were standardized to a common unit. This standard unit is the carbon dioxide equivalent (CO_2e), which is calculated by multiplying the GHG emissions for each gas by their respective Global Warming Potential (GWP). It is anticipated that GHG emissions from operation and maintenance of either Alternative 1 or Alternative 2 would be minimal and do not have enough significance to be quantified.

Under the No Action Alternative, no storm sewer or sanitary sewer system improvements would occur, therefore there would be no short-term or long-term impacts to GHG emissions from the No Action Alternative.

Alternative 2, the recommended plan, had lower GHG emissions compared to Alternative 1 and the No Action Alternative (Table 2). No alternative would sequester

carbon. No alternatives would impact the ability of the State of Indiana or the Federal Government from meeting their emissions goals. Implementation of any alternative would result in no significant short-term or long-term impacts. Implementation of either Alternative 1 or Alternative 2 would result in no significant short-term or long-term air quality impacts related to GHG emissions.

Table 3. GHG emission calculations for all alternatives.

Metric	No Action Alternative	Alternative 1	Alternative 2
Total CO2e[1]	0	1,005.6	294.3
Total Net Emissions[1,2]	0	1,005.6	294.3

[1] Metric Tons [2] Action Alternative - No Action Alternative

Short-term impacts to air quality are not expected under the No Action Alternative. It was assumed that under the No Action Alternative, there would be no new GHG emissions as construction of the project would not occur.

3.4.5. Land Use

Existing Condition

Existing land use within the project area is entirely comprised of airport operations and support facilities. The City of Gary classifies the project area as heavy industrial within its zoning code. The adjacent land use around the project area consists of transportation, industrial, and vacant land. The closest residential neighborhood to the project area is the West Side neighborhood of Gary, located approximately 0.25 miles to the south, across the Grand Calumet River.

Alternative Impacts

Construction of Alternative 1 or Alternative 2 would not change land use within or adjacent to the project area. The construction of Alternative 1 or Alternative 2 would improve storm and sanitary sewer service within the project area but would not significantly increase the capacity of the system to promote further development or land use change. Therefore, neither Alternative 1 nor Alternative 2 would have a short-term or long-term impact on land use within or adjacent to the project area. No impacts to land use are expected under the No Action Alternative.

3.5. Biological Resources

3.5.1. Aquatic Communities

Existing Condition

The project area consists primarily of paved surfaces (buildings, access roads, parking lots, runways) surrounded by mowed lawns (Figure 1). There are some freshwater emergent wetlands and freshwater shrub/forested wetlands present within the project area, primarily in the southeast and northwest corners of the GCIA (Figure 2 and Figure

4). The Grand Calumet River is located on the southern extend of the GCIA property.

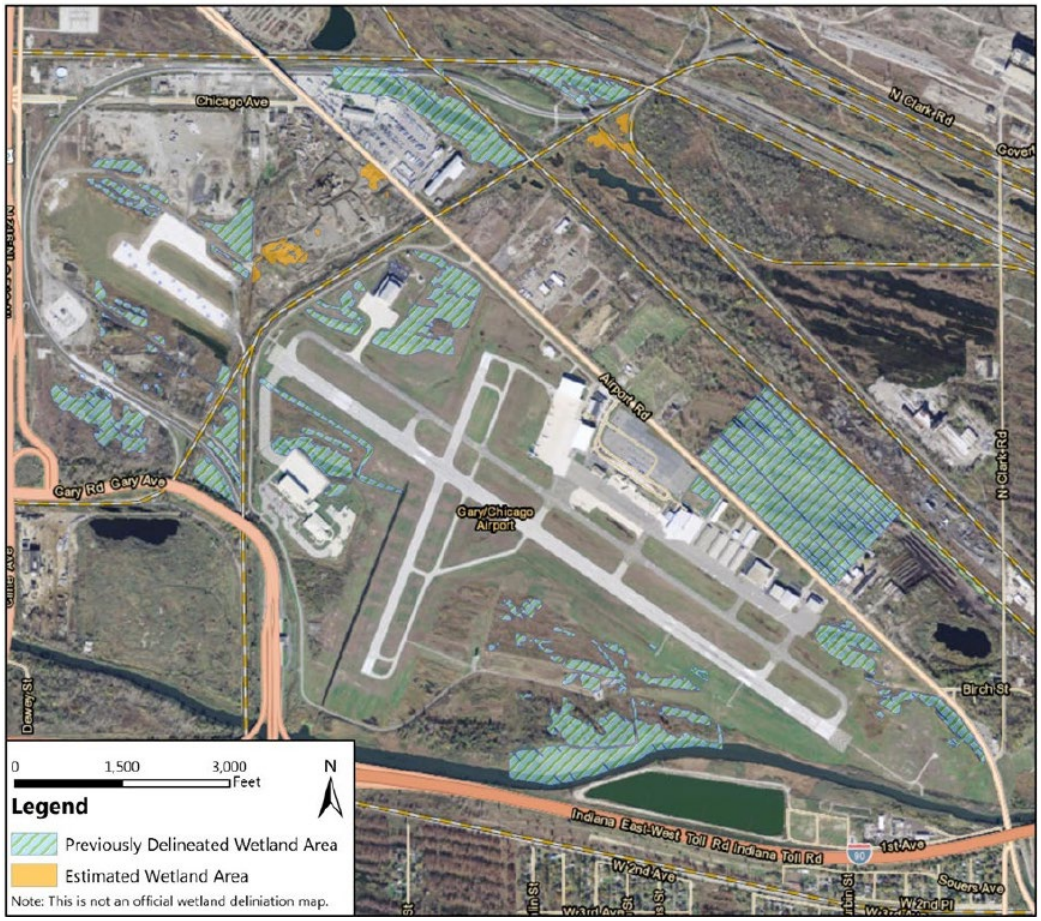

Figure 4: Delineated and estimated wetlands at GCIA (GCIA, 2020).

Alternative Impacts

Construction of Alternative 1 would involve earth disturbance associated with the full replacement of storm and sanitary sewer pipe and structures through open cut methods. While most water resources are located away from storm and sanitary sewers, there are limited areas where storm sewer infrastructure is within close proximity to delineated wetlands. This would result in minor short-term adverse impacts to any aquatic communities present within the project area. Implementation of appropriate erosion and sedimentation controls would prevent impacts to water resources and aquatic communities from upland areas.

Construction of Alternative 2 would involve limited earth disturbance for storm sewer end section replacements and sanitary sewer point repair. The point repair would occur in a paved area of the GCIA and storm sewer end section replacements would not involve excavation or fill placement within wetlands. Implementation of appropriate erosion and sedimentation controls would prevent impacts to water resources and aquatic communities from upland areas. Therefore, there would be no short-term or long-term adverse impacts to aquatic communities.

The No Action Alternative would have minor impacts to aquatic communities due to adverse water quality effects of storm and sanitary sewer back-ups and overflows.

3.5.2. Terrestrial Communities

Existing Condition

Habitat characteristics of the GCIA property are primarily cleared or developed areas (e.g., terminal, hangars, runways, roads, parking, etc.). The developed areas of the airport, aside from the airfield development (e.g., runways and taxiways) are mostly in the northeast portion of the airport property. The undeveloped land around those areas has been primarily cleared of dense vegetation. Airport personnel regularly mow and maintain grasses in these areas. There is a rare dune and swale ecosystem around the GCIA that is unique to northwest Indiana and considered a globally threatened habitat (GCIA, 2020). This ecosystem consists of upland dune ridges alternating with low-relief wetlands. There are ditches that run through the cleared/grassland areas that are part of the GCIA's stormwater management system. Invasive vegetation species, such common reed (*Phragmites australis*), are present adjacent to the project area.

Terrestrial habitat at the GCIA is managed under a Wildlife Hazard Management Plan which defines the responsibilities, policies, and procedures necessary to reduce wildlife hazards at the GCIA. The long-range goal is to actively reduce attractive wildlife habitat on the GCIA property. GCIA is currently coordinating with the U.S. Department of Agriculture to update the Wildlife Hazard Assessment and Wildlife Hazard Management Plan.

Alternative Impacts

Neither Alternative 1 nor Alternative 2 would introduce or spread invasive species. Construction of Alternative 1 would involve earth disturbance associated with the full replacement of storm and sanitary sewer pipe and structures through open cut methods. This would result in minor short-term impacts to terrestrial habitat in the project area.

Construction of Alternative 2 would involve limited earth disturbance for storm sewer end section replacements and sanitary sewer point repair. The point repair would occur in a paved area of the GCIA and this earth disturbance would not affect existing terrestrial habitat at the GCIA, including the dune and swale ecosystem. Therefore, there would be no short-term or long-term adverse impacts to terrestrial communities.

The No Action Alternative would have minor long-term impacts to terrestrial communities due to adverse effects of storm and sanitary sewer back-ups and overflows.

3.5.3. Threatened and Endangered Species

Existing Condition

A query of the USFWS Environmental Conservation Online System Information for Planning and Consultation (ECOS-IPaC) on February 11, 2025, resulted in an official list of threatened and endangered species that may be present within the project area (Appendix B). Obtaining the official species list from ECOS-IPaC fulfills the requirement for federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action". Three federally listed threatened or endangered species were identified through the IPaC query as potentially occurring within the project area (Table 4). Additionally, the IPaC query identified two species designated as either experimental population or proposed threatened. There are no critical habitats within the project area for any species listed below.

Table 4: Federally listed species potentially occurring within the project area

Species Name	Federal Status	Habitat	Potential to Occur
Indiana bat (*Myotis sodalis*)	Endangered	Hibernates in caves and mines – swarming in surrounding wooded areas in autumn. Roosts and forages in upland forests and woods during the summer	Not expected to occur; lack of suitable habitat.
Northern long-eared bat (*Myotis septentrionalis*)	Endangered	Hibernates in caves and mines – swarming in surrounding wooded areas in autumn. Roosts and forages in forests and woods during the summer, often in edge habitat such as fenceline, riparian areas, or canopy gaps	Not expected to occur; lack of suitable habitat.
Piping plover *(Charadrius melodus)*	Endangered	In the Great Lakes region, piping plovers nest on the unvegetated shorelines of lakes, reservoirs, or river sandbars	Not expected to occur; lack of suitable habitat.
Whooping crane *(Grus americana)*	Experimental population, non-essential	Coastal marshes and estuaries, inland marshes, lakes, open ponds, shallow bays, salt marsh and sand or tidal flats, upland swales, wet meadows and rivers, pastures and agricultural fields	Not expected to occur; lack of suitable habitat.

Species Name	Federal Status	Habitat	Potential to Occur
Monarch butterfly (*Danaus plexippus)*	Proposed Threatened	Prefer grassland ecosystems with native milkweed and nectar plants.	Not expected to occur; lack of suitable habitat.

Alternative Impacts

USACE determined that the construction and operation of Alternative 1 or Alternative 2 would have "no effect" on federally listed species. Suitable habitat for the above species is not present within the project area. The project area is primarily within developed areas of the GCIA, including runways, taxiways, parking lots, and mowed grass runway safety areas. Specialized habitat to support the above species such as mudflats, wetlands, meadows, prairies, or sandy shorelines are not present. The mature trees that would be suitable roosting trees for the Indiana bat or northern long-eared bat are not present within the project area (USFWS, 2023). Therefore, neither Alternative 1 nor Alternative 2 would have short or long-term impacts to threatened and endangered species.

No impacts to threatened and endangered species are expected under the No Action Alternative.

3.6. Cultural & Social Resources

3.6.1. Cultural Resources

Existing Condition

Gary, Indiana was founded in 1906 on the southern shore of Lake Michigan, approximately 25 miles from downtown Chicago, Illinois. Gary was founded by the U.S. Steel Corporation which was seeking a location for a massive new steel production facility (Mohl and Betten, 1986). By 1930, Gary had grown to over 100,000 residents, peaking at 178,000 residents in 1960, before declining to 67,000 today (USCB, 2025). Prior to European settlement, the Miami and Potawatomi peoples used the area that would become Gary for hunting, gathering, and ceremonial activities (ALA, 2025).

The GCIA was constructed in its current location 1949, with commercial airline service starting in the 1950s (Chicago Tribune, 2019). In the 1990s, the Gary/Chicago Regional Airport Authority was formed to oversee the planning and growth of O'Hare, Midway, and GCIA.

Alternative Impacts

Neither Alternative 1 nor Alternative 2 would have short-term or long-term adverse effects on historic properties. The undertaking is in Section 35, Township 37 North, Range 9 West in Lake County, Indiana. The Area of Potential Effects (APE) for the undertaking encompasses the project area, including staging and access routes, and totals approximately 570 acres. USACE believes that the APE is sufficient to identify and consider potential effects of the proposed project. USACE has conducted a records

search and literature review of the project APE on the Indiana Inventory of Archaeological Sites and the National Register of Historic Places (NRHP). The literature review and records search revealed that there are no previously known archaeological sites or historic properties listed in the NRHP within the project APE. Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, USACE made the determination there would be no historic properties affected by the proposed undertaking. Coordination with the Indiana State Historic Preservation Office (SHPO) is ongoing and USACE anticipates concurrence with this determination (Appendix B).

No impacts to cultural resources are expected under the No Action Alternative.

3.6.2. Recreation

Existing Condition

Recreation resources are not present within or immediately adjacent to the project area. The closest recreation facilities to the project area are the Gibson Woods Nature Preserve (1.7 miles southwest), the Pine Station Nature Preserve (0.9 miles northeast), Washington Park (2.1 miles northwest), and Brunswick Park (1.4 miles southeast). Regionally, the Indiana Dunes National Park and Indiana Dunes State Park are located approximately 17.0 miles east of the project area.

Alternative Impacts

As no recreation resource are present within or immediately adjacent the project area, no short-term or long-term impacts to recreation are expected under Alternative 1 or Alternative 2. Access to adjacent recreation resources such as parks, nature/forest preserves, or schools would not be affected by either Alternative 1 or Alternative 2.

No impacts to recreation are expected under the No Action Alternative.

3.6.3. Socioeconomics

Existing Condition

Gary has a population of 67,652 (2023) people according to the U.S. Census Bureau (USCB). Median household income is $37,380 (2019-2023). The noise and aesthetic environments are typical for an industrialized urban area in northwest Indiana. Table 5 shows summary census data for Gary, Lake County, Indiana. The Chicago District conducted an evaluation of potential impacts to at-risk communities using minority and low-income populations as criteria. This evaluation was conducted to ensure that no minority and/or low-income populations in the area were disproportionately affected due to activities from this project.

Table 5: U.S. census data for Gary, Lake County, and Indiana (USCB, 2025)

Category	Gary	Lake County	Indiana
Total Population	67,652	500,598	6,833,037
Under 18 years	28.3%	23.0%	23.0%

Category	Gary	Lake County	Indiana
Under 5 years	7.0%	5.7%	5.9%
White	12.7%	70.8%	84.0%
Black or African American	76.5%	24.6%	10.3%
American Indian and Alaska Native	0.1%	0.6%	0.4%
Asian	0.3%	1.8%	2.8%
Native Hawaiian and Other Pacific Islander	0.1%	0.1%	0.1%
Hispanic or Latino of any race	9.8%	21.3%	7.9%
High School Graduate or Higher	86.0%	90.2%	89.8%
Bachelor's Degree or Higher	14.3%	24.9%	27.8%
Median Household Income	$37,380	$68,985	$61,944
Below Poverty Level	32.9%	14.3%	12.2%

Gary has a higher minority population (86.8%) than Lake County (48.4%), Indiana (21.5%) and the national average (44.3%). Gary has a higher poverty rate (32.9%) compared to Lake County (14.3%), Indiana (12.2%) and the national average (11.1%). This indicates that the Proposed Action would occur in a historically at-risk community.

Alternative Impacts

Alternative 1 or Alternative 2 would have no short-term or long-term adverse impacts to socioeconomics within and adjacent to the project area. There would be temporary and insignificant impacts to noise and the aesthetic environment during construction of either Alternative 1 or Alternative 2, though Alternative 2 would have a shorter and less intense construction period. Long-term, Alternative 1 and Alternative 2 are expected to have a beneficial impact on the Gary community, as they would improve storm and sanitary sewer service at the GCIA.

USACE analyzed whether construction of either Alternative 1 or Alternative 2 would have a disproportionate impact to at-risk communities. To evaluate potential disproportional impacts to these communities, socioeconomic data from Gary, Indiana was compared to socioeconomic data from Lake County, the State of Indiana, and the Nation. Negligible, short-term impacts to at-risk communities may occur during construction due to air quality, aesthetic, and noise impacts but Alternative 1 and Alternative 2 would result in long-term beneficial effects.

Short-term impacts to at-risk communities are not expected under the No Action Alternative. However, the No Action Alternative would have negative long-term impacts from possible storm and sanitary sewer backups and overflows.

3.6.4. Public Utilities and Infrastructure

Existing Condition

The project area is serviced by standard utilities such as water, sanitary sewer, gas, and electric. The transportation system around the GCIA is comprised of federal highway

(Interstate 90), state highway, and county and local roads. The GCIA is serviced directly by Airport Road (also known as Industrial Highway), classified as a major arterial by the Indiana Department of Transportation (INDOT, 2025).

Major freight rail lines are located northeast of the GCIA, including Canadian National Railroad, Norfolk Southern Railroad, and Conrail Railroad (INDOT, 2025). The South Shore Line, a regional rail service connecting Chicago and northern Indiana, has a station just to southeast of the GCIA.

Alternative Impact

Alternative 1 and Alternative 2 would have beneficial long-term effects on storm and sanitary sewer service at the GCIA. Standard construction practices would include locating other utilities before construction to avoid impacts. Alternative 1 and Alternative 2 would not have any short-term or long-term impacts to transportation and traffic circulation within the area resulting from construction activities.

The No Action Alternative would have a long-term significant impact to storm and sanitary sewer systems at the GCIA, through continued deterioration and possible blockages and sewer overflows. No impact to other utilities or transportation and traffic circulation are expected under the No Action Alternative.

3.7. Hazardous, Toxic, and Radioactive Waste (HTRW)

Existing Condition

A Phase I Hazardous, Toxic, and Radioactive Waste (HTRW) Environmental Site Assessment (ESA) was completed for the project area in accordance with ASTM Practice E 1527-21 and USACE Engineer Regulation 1165-2-132. The investigation relied on user provided information, site reconnaissance, and a review of reasonably ascertainable environmental records to determine the likelihood that the project area contains a recognized environmental condition (REC), or HTRW. The Phase I ESA was conducted in accordance with ASTM Standard Practice E-1527-21 and constitutes “all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice,” as defined at 42 USC §9601(35) (B).

The Phase I ESA identified several RECs at the subject property and adjacent offsite properties within a 0.25-mile radius (Figure 5). These RECs include:

- Midco II – 5900 Industrial Highway
- Gary Development Co. Inc. – 479 N. Cline Avenue
- Industrial Highway Oil Release – 6131 W. Industrial Highway
- Gary Lagoons/Vogt Conant Property – 5500 Industrial Highway
- Gary Chicago International Airport/Gary Regional Airport – 6001 W. Industrial Highway/Airport Road
- Nike C-45 Gary Airport - 41.616111, -87.412778
- GYY – Gary/Chicago INTL – Address not reported

- Gary International Airport – Address not reported
- Gary Jet Center – Address not reported

Figure 5: Map of RECs within the project area.

Alternative Impacts

In accordance with ER 1165-2-132, *Hazardous Toxic, and Radioactive Waste for USACE Civil Works Projects*, construction of civil works projects in HTRW contaminated areas will be avoided where practicable. Where HTRW-contaminated areas or impacts cannot be avoided, response actions, including excavation and disposal of contaminated soils, would be implemented in accordance with USEPA and applicable state regulatory agency requirements. All HTRW response actions, including off-site

disposal of materials containing elevated concentrations of contaminants, is 100% non-federal project sponsor responsibility. Excess soil management and/or waste disposal would be conducted in accordance with federal, state, and local laws and regulations. Alternative 1 would have adverse impacts to HTRW contaminated areas as full replacement of storm and sanitary sewer pipes would necessitate earth disturbance within HTRW contaminated areas. Earth disturbance under Alternative 2 would only involve excavation for end section replacement and the sanitary sewer point repair, which would occur in areas without RECs. Pipe and structure lining and cleaning and lift station upgrades would not affect HTRW contaminated areas.

The No Action Alternative would have no short-term impacts to HTRW contaminated areas. However, it could have long-term impacts if storm sewer backups and overflows reach HTRW impacted soils and mobilize contaminants.

3.8. Irreversible and Irretrievable Commitment of Resources

Alternative 1 and Alternative 2 would not entail significant irretrievable or irreversible commitments of resources. Long-term sustainability actions were included for the benefit of environmental resources.

3.9. Short-Term Uses of Man's Environment and Long-Term Productivity

NEPA, Section 1502.16(a)(3), calls for a discussion of the relationship between local, short-term uses of man's environment and maintenance and enhancement of long-term productivity in an environmental document. Alternative 1 and Alternative 2 would repair the deficiencies in the storm and sanitary sewer systems in the project area, which would reduce the potential for service disruptions and catastrophic failure. Under the No Action Alternative, no project would be implemented. Therefore, the potential for storm and sanitary sewer backups and overflows would increase over time and the potential for costly emergency repairs and environmental impacts in the project area vicinity would increase.

3.10. Probable Adverse Effects Which Cannot Be Avoided

There are no probable adverse effects which cannot be avoided from the implementation of the recommended plan.

4. COORDINATION AND COMPLIANCE

4.1. Regulatory Requirements

The Proposed Action is in full compliance with appropriate statutes, executive orders, and regulations, including but not limited to the National Historic Preservation Act, as amended, Fish and Wildlife Coordination Act, as amended, Endangered Species Act of 1973, as amended, Section 10 of Rivers and Harbors Act of 1899, Clean Air Act, as amended, National Environmental Policy Act of 1969, as amended, Executive Order 11990 (Protection of Wetlands), Executive Order 11988 (Floodplain Management), and the Clean Water Act, as amended.

During preparation of this Draft EA, numerous federal and state agencies were consulted, including the USFWS and Indiana SHPO. Federally recognized Tribes were also contacted. The NEPA scoping process extended from June 4, 2024 through July 6, 2024. Public review of this Draft EA and FONSI is ongoing. The public was notified of the Draft EA via notices to identified project stakeholders and postings on USACE's webpage. For documentation of coordination, refer to Appendix B. Refer to Appendix C for the project distribution list.

The Final EA will be made available for access by the general public on the USACE Digital Library[1] and will be linked to from the USACE Great Lakes and Ohio River Division webpage[2].

4.1.1. National Historic Preservation Act

Section 106 of the National Historic Preservation Act (16 USC 470) requires federal agencies to consider the effects of proposed federal undertakings on historic properties included or eligible for the National Register of Historic Places. The implementing regulations for Section 106 (36 CFR § 800) require federal agencies to consult with various parties, including the Indiana SHPO, and Indian Tribes, to identify and evaluate historic properties, and to assess and resolve effects to historic properties. USACE determined that no historic properties would be affected by the Proposed Action. Coordination with the Indiana SHPO is ongoing, but concurrence with this determination is anticipated.

4.1.2. Endangered Species Act

Section 7 of the Endangered Species Act requires USACE to ensure their activities are not likely to jeopardize the continued existence of federally listed species or destroy or adversely modify designated critical habit (16 USC 35). USACE accessed the USFWS IPaC website on February 11, 2025, to determine whether endangered, threatened, proposed, or candidate species could potentially be present in the action area, and if the action area overlapped with any designated or proposed critical habitat. The results of the IPaC search are shown in Section 3.5.3. Using the list provided by IPaC, the Chicago District used best available information to evaluate whether the species on the IPaC list would be potentially affected by the action. Pursuant to Section 7 of the Endangered Species Act of 1973, as amended, USACE determined the recommended plan will have "no effect" on federally listed species or their designated critical habitat, due to the projects occurring in areas where there is no suitable habitat present for the identified species.

4.1.3. Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act requires consultation with the state and USFWS for recommendations to minimize impacts on fish and wildlife resources. Because the

[1] https://usace.contentdm.oclc.org/

[2] https://www.lrd.usace.army.mil/

project would not affect or modify surface waters, including wetlands, consultation under the Fish & Wildlife Coordination Act (FWCA), 16 USC 661 et seq., is not required.

4.1.4. Coastal Zone Management Act

The Coastal Zone Management Act (16 USC 1451 et seq.) requires consultation with state agency responsible for management of the coastal zone. The Proposed Action is located within the State of Indiana's coastal zone, managed by the IDNR's Lake Michigan Coastal Program (LMCP). USACE determined that the Proposed Action is consistent with the LMCP. The LMCP concurred with this determination in a letter dated February 18, 2025 (Appendix B).

4.2. Agency Coordination

4.2.1. Indiana State Historic Preservation Office

USACE consulted with the Indiana SHPO to identify and evaluate historic properties, and to assess and resolve effects to historic properties pursuant to regulations for Section 106 (36 CFR § 800) of the NRHP (16 USC 470). USACE determined that no historic properties would be affected by the proposed undertaking. Consultation with the Indiana SHPO is ongoing, but concurrence with this determination is anticipated.

4.2.2. Tribal Coordination

Pursuant to regulations for Section 106 (36 CFR § 800) of the National Historic Preservation Act (54 U.S.C. § 306108), USACE consulted with the consulted with the Citizen Potawatomi Nation of Oklahoma, the Forest County Potawatomi Community of Wisconsin, Hannahville Indian Community of Michigan, Little Traverse Bay Bands of Odawa Indians of Michigan, Miami Tribe of Oklahoma, the Prairie Band Potawatomi Nation, and the Pokagon Band of Potawatomi Indians of Michigan and Indiana. In a letter dated July 2, 2024, the Pokagon Band of Potawatomi Indians indicated that the project would have no adverse effect on any cultural resources but requested to be notified if any cultural artifacts or remains are located during the project. No other responses were received.

4.2.3. U.S. Fish and Wildlife Service

USACE made a "no effect" determination pursuant to section 7 of the Endangered Species Act. No further coordination is required under this act.

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