ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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September 6, 2005

Michael W. MacMullen
Airports Environmental Program Manager
Federal Aviation Administration, Chicago Airports District Office
2300 East Devon Avenue
Des Plaines, IL 60018

Subject: Comments on the Federal Aviation Administration's Final Environmental Impact Statement for the Proposed O'Hare Modernization Program.

Dear Mr. MacMullen:

The Illinois Environmental Protection Agency (Illinois EPA) appreciates the opportunity to comment on the Final Environmental Impact Statement (EIS) prepared for the proposed O'Hare Modernization Program (OMP).

As stated in our comments on the Draft EIS for the OMP, the Illinois EPA appreciates the comprehensive analyses conducted within the Draft EIS. In the Final EIS, the Federal Aviation Administration (FAA) has supplied information on emissions and air quality that exceeds that required by the National Environmental Policy Act (NEPA). Our comments on the Draft EIS also expressed appreciation for the commitment of the FAA and the City of Chicago to incorporate strategies intended to reduce such emissions from the construction and operation of the O'Hare Modernization Program. The Illinois EPA is gratified to see that the Final EIS contains an extensive list of possible control measures, both for air quality and water quality improvement, which could be implemented.

We encourage you to the maximum extent possible to implement these measures, especially those that will have the effect of reducing ozone precursor and particulate matter emissions. Particularly, we encourage the FAA and the City of Chicago to attempt to mitigate construction emissions through the use of ultra-low sulfur diesel fuel and the newest and cleanest possible construction equipment engines or the installation of additional emissions control equipment on construction equipment. Further, we encourage that the City of Chicago implement the construction scenario that produces lowest practicable level of excavation material removal.

The Illinois EPA also recommends the use of diesel- powered ground service equipment be converted to use of electricity or cleaner-burning alternative fuels to the greatest extent practicable. The Illinois EPA stands ready to work with the City of Chicago other on the submittal of a Voluntary Airport Low Emission (VALE) program application to FAA to provide funding for such a program.

The Illinois EPA is currently reviewing the application package submitted for the anti-degradation assessment and Section 401 Water Quality Certification pertaining to the project-related impacts to wetlands and waters of the United States. The wetland mitigation plan submitted is currently under review by the Mitigation Review Team (MRT) and is awaiting publication of a public notice by the U.S. Army Corps of Engineers. The Illinois EPA will continue its review of the application and associated mitigation plan, and intends to complete that review following an evaluation of any pertinent public comments received as a result of the notice on this matter. Construction activities that would impact wetlands and waters of the United States are not authorized until the Section 401 water quality certification is issued.

Again, the Illinois EPA appreciates the level of cooperation received from the FAA and its third party contractors throughout the EIS process. We look forward to working together during the implementation of the OMP to assist in reducing its potential environmental impacts.

If you have any questions about these comments please contact Mike Rogers at (217) 524-4408.

Very truly yours,

Douglas P. Scott
by J.H.

Douglas P. Scott
Director

cc: City of Chicago