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**APPENDIX H: Draft EA Comments**

### BDR Draft Environmental Assessment Comments

#	DATE	AUTHOR	COMMENT	RESPONSE
1	4/15/22	Jonathan Winter	Writes in support of the planned safety improvements because they are vital to the safety of the airport and long-term vitality.	Comment noted.
2	4/15/22	Alec Crawford (pilot, N218TG at Atlantic North)	Writes in support of reconstruction of Runway 11-29 with added safety improvements. Also supports keeping both runways because having only one runway would create dangerous conditions during high wind conditions that are not aligned with the runway.	Comment noted.
3	4/15/22	Aaron Hollander (pilot, N6745)	Believes that eliminating Runway 11/29 would be a serious mistake for safety, noise abatement, and the environment. Runway 11/29 is the most appropriate runway for prevailing winds and often the most effective in reducing noise impacts on neighbors. Additionally, because most corporate aircraft are located on the North side of BDR, Runway 11/29 is the most effective in reducing taxi and hold times. He states that BDR is already suffering from both runways being too short and would prefer that runway 6/24 be lengthened by 2,000 ft. by moving Main Street, causing enormous economic benefit.	Comment noted.
4	4/18/22	Tom Gessler	Agreed with Alec Crawford's comment.	Comment noted.
5	4/20/22	David Faile (Friends of Sikorsky Airport)	Asked if we were aware that Embraer E-195 aircraft are now using BDR. Would like to know what the airport plans to do about this.	BDR staff is aware that Embraer E-195 aircraft were present at BDR on a temporary basis. It is not unusual to have operators that do not typically use the airport use it on a one-off basis (Ex. military operations). It is not anticipated that this aircraft will be a regular user of the airport at this time.
6	4/21/22	Robert Andel (pilot &	Writes in support for reconstruction of Runway 11/29 and the safety area improvements. Runway 11/29 provides an important role in reducing crosswind accidents at BDR, making the airport more usable for	Comment noted.

		aircraft owner)	aircraft with limited crosswind capability. The safety areas (EMAS) could save lives and prevent aircraft damage. Reconstruction is long overdue.	
7	4/25/22	Toni Lorenti (Gama Aviation)	Offered his credentials. Wrote that he has a favorable opinion of the project and considers the selected alternative a fair compromise between a myriad of issues. The project will enhance the airport environment in several ways: 1. Maintain current runway length which he believes will improve takeoff and landing numbers for several aircraft types. Better landing performance will lead to less airborne holds/diversions that equate to environmental and safety benefits. 2. EMAS will minimize airport hazards. 3. The selected alternative minimizes environmental impacts as opposed to the other alternatives. Overall, the enhancements directly benefit the flying public and favorably impact surrounding communities.	Comments noted.
8	4/27/22	Timothy Timmermann (U.S. Environmental Protection Agency Region I)	<p>The EPA does not object to the preferred alternative but recommends that the FAA provide additional information to better explain environmental justice (EJ) considerations, impacts to children’s health, and impacts associated with climate change.</p> <p>EJ: The EPA recommends using certain tools and resources (listed in their comment) to present a more complete analysis of the potential for short- and long-term impacts to EJ populations. Based on the EPA’s analysis, neighborhoods to the north of the airport appear to have significant EJ concerns. The EPA encourages focused outreach with affected communities in plain language in addition to appropriately translated communications. Public meetings should be accessible to all and scheduled at times that accommodate the greatest number of participants. An inventory of outreach efforts to date and going forward is recommended.</p> <p>Children’s Environmental Health: The EPA recommends that the FAA conduct a robust assessment of potential short- and long-term susceptibilities to pollutants of concern including 1. Identifying pollutants and their source and if they pose a risk to children 2.</p>	The project team has explored each tool/resource provided by the EPA and identified which resources would add value to the Final EA based on project specific information. As a result, the Affected Environment section was updated to include an analysis of the surrounding area’s Social Vulnerability Index. Additionally, the EJScreen Tool was used to confirm the presence of an EJ population north of the project, identify the prevalence of linguistically isolated populations, and determine which surrounding communities had a heightened population of children. The

			<p>Analyzing demographics to determine the presence of children and identification of nearby facilities where children are likely to be present</p> <p>3. Discussing relevant, publicly available health data for surrounding populations and potential health impacts from construction and tree removal.</p> <p>Climate Change: Consider 2014 FEMA FIRM findings. Discuss climate change impacts on storm surge, storm frequency and intensity, and increases in participation in the Northeast.</p>	<p>Consequences section of the Final EA was updated to better describe public outreach mechanisms and a more in-depth analysis of children’s health impacts was developed.</p> <p>To address comments on climate change, the project team added a section within the Affected Environment section dedicated to climate change and expanded on the climate section within the Consequences section.</p>
9	4/28/22	Susan Jacobson (Connecticut Department of Energy and Environmental Protection)	<p>Stated that the general location of inland wetlands, tidal wetlands, and floodplains are identified and the need for permitting related to these resources is acknowledged. The challenges related to permitting and the need for mitigation are also identified. Specific to wetlands and floodplains, activities would most likely require review under Structure, Dredging and Fill, Tidal Wetlands, Section 401 Water Quality Certification, Inland Wetlands, and Flood Management. Wetland impacts that cannot be avoided would need to be mitigated at a minimum of a 3:1 ratio.</p>	<p>A minimum of 3:1 wetland mitigation ratio was added to the Water Resources section of the Final EA.</p>

## Koutropoulos, Taylor

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**From:** donotreply@chamailservice.com  
**Sent:** Friday, April 15, 2022 7:59 AM  
**To:** Heckroth, Mark; Kuang, Calvin  
**Subject:** [--EXTERNAL--]: BDR Master Plan & Environmental Assessment Contact Form

### BDR Master Plan Contact Us / Comment

<b>Email Signup</b>	Yes
<b>First Name</b>	Jonathan
<b>Last Name</b>	Winter
<b>Street Address</b>	70 Hubbard Ave
<b>City</b>	Stamford
<b>State</b>	CT
<b>Zip Code</b>	06905
<b>Phone Number</b>	2036060128
<b>Email Address</b>	jwinter06@gmail.com

#### Comment (below)

I am writing in support of the planned safety improvements, reconstruction/rehabilitation etc for 11/29. This is vital to the safety of our airport and long term viability. Thanks.

## Koutropoulos, Taylor

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**From:** Alec Crawford <alec.crawford.s@gmail.com>  
**Sent:** Friday, April 15, 2022 9:26 AM  
**To:** Heckroth, Mark  
**Subject:** [--EXTERNAL--]: Supporting KBDR master plan

I support the Sikorsky Airport Master Plan that focuses on the reconstruction of Runway 11-29 with added safety improvements. I strongly support the much-needed reconstruction of Runway 11-29, including the addition of Runway Safety Areas. Having only one runway would create dangerous conditions during high wind conditions that are not aligned with the runway, so I also support keeping both runways.

Best Regards,

Alec Crawford (pilot, N218TG at Atlantic North)  
11 Pine Ridge Rd  
Greenwich, CT 06830

## Koutropoulos, Taylor

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**From:** Aaron Hollander <ahollander@firstaviation.com>  
**Sent:** Friday, April 15, 2022 9:43 AM  
**To:** Heckroth, Mark  
**Cc:** David Faile  
**Subject:** [--EXTERNAL--]: Mater Plan for Sikorsky Memorial Airport

To the Sikorsky Memorial Airport Commission, FAA and Friends of Sikorsky Airport, I have been a pilot utilizing Sikorsky Memorial Airport for 45 years and continue to operate our corporate aircraft from BDR.

It has come to my attention that the FAA may be considering eliminating runway 11/29.

This would be a serious mistake from the perspective of safety, noise abatement and the environment.

Due to the prevailing winds, Runway 11/29, BDR's longest, is the most appropriate.

Further, it often is the most effective in reducing the noise footprint for neighbors.

Also, not previously noted, most corporate aircraft are on the North side of the airport making 11/29 the most effective in reducing taxi and hold times.

Once a runway is eliminated, it will never be returned to service.

The airport is already suffering from both runways being too short.

It is my opinion that rather than diminishing the value of Sikorsky, runway 6/24 should be lengthened by 2,000 ft. by moving main street.

This will be an enormous economic benefit to Connecticut in general, and Fairfield County specifically.

Thank You,

Aaron Hollander

N6745

## Koutropoulos, Taylor

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**From:** tomgessler@aim.com <tomgessler@aol.com>  
**Sent:** Monday, April 18, 2022 7:12 PM  
**To:** Alec Crawford; Heckroth, Mark  
**Subject:** [--EXTERNAL--]: Re: Supporting KBDR master plan

Agree.

[Sent from the all new AOL app for iOS](#)

On Friday, April 15, 2022, 09:25, Alec Crawford <alec.crawford.s@gmail.com> wrote:

I support the Sikorsky Airport Master Plan that focuses on the reconstruction of Runway 11-29 with added safety improvements. I strongly support the much-needed reconstruction of Runway 11-29, including the addition of Runway Safety Areas. Having only one runway would create dangerous conditions during high wind conditions that are not aligned with the runway, so I also support keeping both runways.

Best Regards,

Alec Crawford (pilot, N218TG at Atlantic North)  
11 Pine Ridge Rd  
Greenwich, CT 06830



## **Koutropoulos, Taylor**

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**From:** David Faile <dfaile@aol.com>  
**Sent:** Wednesday, April 20, 2022 6:26 PM  
**To:** Heckroth, Mark  
**Subject:** [--EXTERNAL--]: KBDR Master Plan Public Meeting

Attending the meeting and the system says that the server for asking questions is not able to connect.

This is blocking our ability to ask questions during this public meeting!

My question is:

Is the Master Plan aware that we now have Embraer E-195 aircraft using KBDR?

Picture attached.....

Please let me know what you plan to do about this.



David Faile, M/CFI, A&P  
Friends Of Sikorsky Airport

## Koutropoulos, Taylor

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**From:** donotreply@chamailservice.com  
**Sent:** Thursday, April 21, 2022 1:34 PM  
**To:** Heckroth, Mark; Kuang, Calvin  
**Subject:** [--EXTERNAL--]: BDR Master Plan & Environmental Assessment Contact Form

### BDR Master Plan Contact Us / Comment

<b>Email Signup</b>	Yes
<b>First Name</b>	Robert
<b>Last Name</b>	Andel
<b>Street Address</b>	84 Cornfield Road
<b>City</b>	Milford
<b>State</b>	CT
<b>Zip Code</b>	06461
<b>Phone Number</b>	203-878-9113
<b>Email Address</b>	robert.andel@sbcglobal.net

#### Comment (below)

I would like to indicate my strong support for the reconstruction of runway 11-29, as well as the addition of safety areas at both ends of that runway. As a pilot and aircraft owner, runway 11-29 provides a very important role in reducing crosswind accidents/incidents at Sikorsky airport, making the airport much more usable for aircraft with limited crosswind capability. The safety areas are an obvious improvement which could save lives and prevent aircraft damage during an overrun/undershoot occurrence. This reconstruction is a long overdue necessity for Sikorsky Airport.

## Koutropoulos, Taylor

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**From:** ALoren1973 <aloren1973@yahoo.com>  
**Sent:** Monday, April 25, 2022 11:03 AM  
**To:** Heckroth, Mark  
**Subject:** [--EXTERNAL--]: PUBLIC COMMENT, BDR RUNWAY 11-29 PROJECT.

My comments are in regard to the BDR Masterplan project related to the Runway 11-29 150' shift, EMAS and attendant matters.

To substantiate and validate my input from a technical standpoint, I offer my professional credentials:

Airline Transport Pilot, Certificated Flight Instructor, Single & Multi Engine. Certificated Ground Instructor, Basic, Instrument and Advanced.  
Type Rated ATR 42/72, ERJ 135/145, CE680.  
22 Years operating as a Pilot under CFR 14 Part 121

Currently, I am one of 3 rated pilots assigned to a high-performance Part 25 Transport Aircraft based at BDR.

As such, my opinion on this project is favorable. As I understand the documentation and audio/video presentation, the considered alternative represents a fair compromise of the myriad issues that intertwine Airports, Aircraft, Community Residents and the Environment. This project appears to not only harmonize these aspects of the airport environment, but enhance them in the following way:

1. Maintaining the current length of Runway 11-29 so as to maintain operational flexibility, capability and safety. As described, I believe this project will IMPROVE runway performance "numbers" (Takeoff and Landing) for several aircraft types that utilize BDR.

When considering Landing performance, this, in turn, will lead to less airborne holds and diversions. This will equate to environmental benefits by leading to less fuel burn by otherwise delayed/holding/diverting aircraft. Finally, this will directly relate to improved safety as Pilot workload will be reduced by a lesser need to hold and divert.

In my professional opinion (substantiated by the techniques used to calculate takeoff and landing data), this project does not permit larger aircraft to operate from BDR. Rather, it allows those that currently utilize BDR to do so with greater margins of safety and flexibility.

2. EMAS. This system will (as it has shown in case incidents) serve to minimize the hazards with potential overrun and undershoots.

3. The considered alternative serves to minimize environmental impacts (stated in the literature) as opposed to other alternatives. This demonstrates favorable commitment to the environment on the part of BDR.

In summary, a safer, operationally enhanced airport DIRECTLY BENEFITS THE FLYING PUBLIC. This, by default, favorably impacts the surrounding community.

Toni Lorenti  
Captain, CE680, KBDR  
Gama Aviation, A Wheels Up Company.  
aloren1973@yahoo.com



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION I**  
**5 POST OFFICE SQUARE SUITE 100**  
**BOSTON, MASSACHUSETTS 02109-3912**

April 27, 2022

Richard Doucette  
Federal Aviation Administration  
1200 District Avenue  
Burlington, Massachusetts 01803

RE: Environmental Assessment for Safety Improvements for Runway 11-29 at the Igor I. Sikorsky Memorial Airport, Bridgeport, Connecticut

Dear Mr. Doucette:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we reviewed the Environmental Assessment (EA) prepared by the Federal Aviation Administration (FAA) for Safety Improvements for Runway 11-29 at the Igor I. Sikorsky Memorial Airport in Bridgeport, Connecticut. The EA considers the impacts of alternatives associated with obstruction removal and upgrades to the Runway Safety Area for Runway 11-29. According to the EA the “proposed improvements will improve and enhance safety but not change the runway’s length, width, or strength.”

We reviewed the EA and found the discussion of alternatives comprehensive. We do not object to the preferred alternative identified in the EA but recommend that the FAA provide additional information (as described in the attachment to this letter) to better explain how environmental justice considerations, impacts to childrens health and impacts associated with climate change were considered.

Thank you for the opportunity to review and comment on the EA. Please contact me with any questions at (617) 918-1025 or [timmermann.timothy@epa.gov](mailto:timmermann.timothy@epa.gov).

Sincerely,

Timothy Timmermann  
Director, Office of Environmental Review

cc: Mr. Mark Heckroth, CHA Consulting, Inc.

## Detailed Comments Regarding the Environmental Assessment for Safety Improvements at the Igor I. Sikorsky Memorial Airport in Bridgeport, Connecticut

### Environmental Justice and Children's Health Comments

EPA offers the following comments to assist and encourage the FAA to consider environmental justice issues and communities with environmental justice concerns and reduce potential impacts to children's environmental health in accordance with Executive Order 13985 on *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (January 20, 2021); Executive Order 12898 on *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 16, 1994) and Executive Order 13045 on *Protection of Children from Environmental Health Risks and Safety Risks* (April 21, 1997).

#### Environmental Justice

The draft EA suggests that the Sponsor's Preferred Action may not have a "significant impact" on communities located in the vicinity of Sikorsky Memorial Airport (page 5-20). EPA recommends that FAA refer to the tools and resources listed below to present a more complete analysis of the potential for short and long term impacts the proposed project may have on communities with environmental justice concerns located in the vicinity of the airport. Based on information in EPA's EJScreen tool, areas located in the vicinity of the airport (including neighborhoods located north of the airport) appear to be communities with significant environmental justice concerns.

A critical part of achieving environmental justice is ensuring appropriate, timely and meaningful stakeholder involvement in decisions affecting communities with environmental justice concerns. We encourage FAA to use the tools below to fully analyze environmental justice issues and develop focused outreach efforts to ensure that affected communities are informed and provided opportunities to meaningfully engage in decision making regarding the project. We encourage FAA to develop communications written in plain language that can be understood by all affected community members. We also encourage FAA to determine if any linguistically isolated populations live in the vicinity of the airport and provide appropriate translation and interpretive services to ensure meaningful engagement. Public meetings should be accessible to all and scheduled at times that accommodate the greatest number of participants. We recommend that the EA include an inventory of outreach efforts to date and develop a forward-looking outreach plan.

To assist in the evaluation of disproportionately high and adverse effects on communities with environmental justice concerns, consider the following screening tools (which should be ground-truthed and supplemented as needed):

- EPA's [EJScreen](#) as a first step in environmental justice analyses.
- Center for Disease Control (CDC)'s [Tracking Network](#), contains data and information on environments and hazards, health effects, and population health.

- EPA's [Health Impact Assessment \(HIA\) Resource and Tool Compilation](#), includes tools and resources related to the HIA process and those that can be used to collect and analyze data, establish a baseline profile, assess potential health impacts, and establish benchmarks and indicators for monitoring and evaluation. These resources include literature and evidence bases, data and statistics, guidelines, benchmarks, decision and economic analysis tools, scientific models, methods, frameworks, indices, mapping, and various data collection tools.
- EPA's [Air Now](#) portal, for air quality data.
- CDC's [Social Vulnerability Index](#), identifies communities that may need support before, during, or after disasters.
- EPA's [NEPAssist](#), a screening tool that contains environmental and socioeconomic information with national GIS data layers. The application links to EPA's EJSCREEN tool as well.
- EPA's [ENVIROFACTS](#) and [ENVIROATLAS](#), which are points of access to a large number of EPA environmental data sets covering, climate, criteria air pollution, air toxics, water pollution, waste sites, toxic releases, enforcement, and more.
- EPA's [Facility Level Information on Greenhouse Gases Tool](#) which has an EJ mapping layer that will allow users to view demographic indicator information using census tract information. EPA's Greenhouse Gas Reporting Program (GHGRP) also has an [EJ Demographic Highlights dashboard](#) to view data on demographic indicators in proximity to GHGRP reporting facilities by industry through interactive maps, graphs, and charts.
- The "[Environmental Justice \(EJ\) Interagency Working Group \(IWG\) Promising Practices for EJ Methodologies in NEPA Reviews](#)" report, or the Promising Practices Report, provides ways to both consider environmental justice concerns during environmental analyses and encourage effective participation by communities with environmental justice concerns.

### Children's Environmental Health

As recognized in Executive Order 13045, some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to environmental health and safety risks. It is well documented that children are more susceptible to many environmental factors, including exposure to mobile source air pollution, particulate matter from construction and diesel emissions, and lead and other heavy metals present in construction and demolition debris. The draft EA suggests that no impacts on children's health or safety are anticipated regarding the Sponsor's Preferred Action (pages 5-20 to 5-21). EPA recommends that FAA conduct a robust assessment of potential short and long-term exposures and susceptibilities to pollutants of concern, including:

- Identification of the pollutants and sources of concern: Consider whether the pollutants and sources of concern pose a particular hazard to children's health (for example, lead or other heavy metals, or air pollution from near roadway exposures)
- Exposure Assessment: Describe the relevant demographics of affected neighborhoods, populations, and/or communities and focus exposure assessments on children who are

likely to be present at schools, recreation areas, childcare centers, parks, and residential areas in close proximity to the proposed project, and other areas of apparent frequent and/or prolonged exposure.

- Baseline health conditions: Consider obtaining and discussing relevant, publicly available health data/records for the populations, neighborhoods, and/or communities of concern.
- Based on the nature of the proposed project, FAA may want to take a closer look at potential respiratory impacts/asthma, noise impacts and air quality impacts from mobile sources associated with construction and tree removal operations.

### Consideration of Climate Change Impacts

The EA could be expanded to more fully consider whether impacts related to climate change will affect the project. We note that considerations of potential flooding impacts are based on FEMA 100-year flood elevation data which does not consider the more up to date 2014 FEMA FIRM findings. There is also no mention of climate change impacts on storm surge, storm frequency and intensity, and increases in precipitation in the Northeast. According to the Fourth National Climate Assessment (NCA4) released in 2018, climate change is intensifying rainfall, storm surge events and high tides. For storm Surge data, consider using the National Hurricane Center's National Storm Surge Hazard Map (Version 2 released in 2018). The Northeast Chapter of NCA4 addressed that the Northeast region is susceptible to major storm events nearly year-round and when sea level rise is coupled with storm surge there are severe risks of flooding. Furthermore, the strongest hurricanes are anticipated to become both more frequent and more intense in the future, with greater amounts of precipitation.



## Koutropoulos, Taylor

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**From:** Jacobson, Susan <Susan.Jacobson@ct.gov>  
**Sent:** Thursday, April 28, 2022 11:09 AM  
**To:** Heckroth, Mark  
**Cc:** Caiola, Jeff; Koutropoulos, Taylor; Dan Hageman  
**Subject:** [--EXTERNAL--]: RE: Public Notice of Availability for Igor I. Sikorsky Memorial Airport Draft Environmental Assessment

**Importance:** Low

Hi Folks, Sorry, we did not have much time to dive into all the details, but we can provide this general review:

The Draft Environmental Assessment, dated March 2022, provides baseline data for the Master Plan Update which covers a 20-year planning period. General development concepts are presented, but no specific activities are being proposed at this time. The general location of inland wetlands, tidal wetlands and floodplains areas are identified and the need for permitting related to these resources is acknowledged. The challenges related to permitting in these areas and the need for mitigation is also identified. Specific to wetlands and floodplains, activities would most likely require review under Structures, Dredging and Fill, Tidal Wetlands, Section 401 Water Quality Certification, Inland Wetlands, and Flood Management. Wetland impacts that cannot be avoided would need to be mitigated at a minimum of a 3:1 ratio.

Please let me know if you have any questions,  
Sue

Susan Jacobson, Supervising Environmental Analyst  
Land and Water Resources, Regulatory - West  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street, Hartford, CT 06106-5127

P: 860-424-3693  
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**From:** Caiola, Jeff <Jeff.Caiola@ct.gov>  
**Sent:** Wednesday, April 27, 2022 7:59 AM  
**To:** Jacobson, Susan <Susan.Jacobson@ct.gov>  
**Cc:** Thompson, Brian <Brian.Thompson@ct.gov>  
**Subject:** Fw: Public Notice of Availability for Igor I. Sikorsky Memorial Airport Draft Environmental Assessment

Do we have any comments on Sikorsky?

Jeffrey Caiola, Assistant Director