



May 24, 2023

Ms. Florence Bass  
Mississippi Department of Environmental Quality  
Storm Water Branch  
P.O. Box 2261  
Jackson, MS 39225-2261

Re: Trent Lott International Airport - MOU  
Review of Water Quality Certification Scope of Review and Denial Factors  
WQC  
(NS Job No. 17834/ CE Job No. 221-083.016)

Dear Ms. Bass:

Please see the attached Scope of Review and Denial Factors evaluation for the Trent Lott International Airport (TLIA) Memorandum of Understanding (MOU). The Jackson County Airport Authority (JCAA) has entered a MOU with the U.S. Army Corps of Engineers for the TLIA to allow an expedited review of permit applications for development at the airport. The TLIA previously received concurrence for site development projects from Mississippi Department of Environmental Quality (MDEQ) under a Master Plan Permit with the Corps of Engineers that has expired. The MOU replaces the Master Plan Permit and provides similar predevelopment review by the commenting agencies. MDEQ would then be able to provide an expedited review of a specific project with respect to Water Quality Certification.

Because most of the project area is identified as wetlands, projects proposed within the area would require a Federal permit under Section 404 of the Clean Water Act. Water quality certification review at this time will help to reduce the review time when a permit application for a specific project is submitted.

Please review the information provided and let me know if you need anything else to facilitate initial approval of water quality certification in conjunction with the MOU.

Sincerely,

NEEL-SCHAFFER, INC.

Lisa D. Morrison, RPG  
Senior Geologist

LDM/cf

Attachments: Water Quality Evaluation per ADM Chapter 11 Part 6, Rule 1.3.4

<https://jcedf.sharepoint.com/Shared Documents/Sites/Compton Projects/221-083 JCEDF Misc Services/016 TLIA MOU/Docs/water quality certification/Submittal of SOR and DF.docx>

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#### **Water Quality Evaluation per ADM Chapter 11 Part 6, Rule 1.3.4**

The proposed project will be developed with projects that require proximity to an airport runway. The project requires that proposed development must be aviation industries that require siting adjacent to an air runway facility and cannot by nature be located off-site. Projects must have runway dependent characteristics such that operations could not occur without runway access or must provide direct support to aviation technology commerce. A general site location map is attached and a site layout showing the potential developable lots at TLIA is included. Because most of the project area is identified as wetlands, projects proposed within the area would require a Federal permit under Section 404 of the Clean Water Act. Water quality certification review at this time will help to reduce the review time when a permit application for a specific project is submitted.

The elements used to evaluate the project's water quality issues are presented as follows:

- 1) Feasible Alternatives – Since this project is location specific, there are no location alternatives that are applicable. When a potential project is identified, site design alternatives will be considered in order to develop the site with the least impact on environmental conditions on site.
- 2) Minimize – TLIA will require that potential tenants evaluate potential designs with respect to the location of any wetlands on site. Only low and medium quality wetlands are in areas that are considered to be developable. Jackson County Airport Authority has conducted an updated wetland delineation to evaluate the location and quality of wetlands present at the TLIA and has determined that there are approximately 72 acres of wetlands within the two parcels of land that have the most potential to be developed within the Air Park. This delineation has been submitted to the U.S. Army Corps of Engineers to obtain a Jurisdictional Determination. Since the parcels are almost 100% wetlands TLIA will utilize design and construction methods that will allow avoidance of as much impact as possible. At this time, there is no immediate potential development so it is not possible to determine the amount of impact that may occur. See attached 2023 wetland delineation maps.
- 3) Mitigation – TLIA or their tenant will purchase the appropriate amount of wetland credits from an approved mitigation bank that serves Jackson County.
- 4) Initial and secondary impacts on all existing and all classified uses of the waters of the State:

The receiving stream is identified as Brickyard Bayou which arises in the vicinity of the airport and is a tributary to the Pascagoula River which is classified for Public Water Supply. Brickyard Bayou is not specifically classified so is considered classified as Fish and Wildlife use. There are no TMDLs listed for Brickyard Bayou. Water quality criteria for Fish and Wildlife use include bacteria, specific conductance, and total dissolved solids. It is not anticipated that fill within the project area will have an impact on these criteria given that measures to prevent run off of sediment and stormwater would be implemented during construction.

The initial impacts associated with the project and the secondary impacts that may result include:

- Initial impacts – Fill - A potential project would require fill to bring the elevation out of the flood plain and allow construction. At this time it is not possible to evaluate the extent of fill required. If a project is greater than five acres, then post construction stormwater design will be implemented.

- Cultural Resources – A Cultural Resources Survey was conducted for the subject property. No cultural resources were identified. Correspondence with MDAH is attached.
- Endangered Species – An updated Endangered Species Survey was conducted in October 2022 and provided to the US Fish and Wildlife Service. The survey identified potential habitat for the federally threatened red-cockaded woodpecker (*Picoides borealis*, RCW). Although trees potentially suitable for foraging and nesting are present, no RCW's nor their cavities were observed. The FWS concurred with the determination regarding the RCW. There are no records of this species within or near the TLIA and the fire-maintained, open-pine habitat required by the RCW appears to be absent within or adjacent to the TLIA.

The FWS indicated that the project area may provide suitable habitat for endangered Mississippi Sandhill Crane (*Grus canadensis pulla*). FWS indicated that they have numerous records of cranes using the mowed portions of the TLIA, which mimics the open-pine savannah habitat necessary for foraging and roosting. FWS recommended that this species be considered during the planning stages of all future activities at the TLIA, and avoidance and minimization measures be developed to avoid impacts to this species. TLIA agreed to consider the Mississippi Sandhill Crane in future planning. No other potential habitat for endangered or threatened species was identified.

- Wetlands – A updated wetland delineation was completed for the most likely developable areas of the project area. Positive wetland indicators were found for hydrology, vegetation, and soils on +/- 72.98 acres of the +/- 73.13-acre project areas. When a project is identified and permitted, an appropriate amount of wetland credits would be purchased to offset the proposed impact. A copy of the previous jurisdictional determination based on HGM methodology for TLIA is attached. In addition, TLIA has submitted a request for an updated JD for only the lots that are most likely to be developed from the Corps of Engineers and this evaluation is in progress.
- Water Quality – Best management practices will be implemented during construction to avoid impacts to water quality. Since a potential project would be part of a larger plan of development, the MDEQ will require that a Large Construction Notice of Intent be prepared for any site developed within the project area at TLIA. In addition, a SWPPP will be prepared to document best management procedures to be implemented during construction activities. The receiving stream is identified as Brickyard Bayou which arises in the vicinity of the airport and is a tributary to the Pascagoula River which is classified for Public Water Supply. Brickyard Bayou is not specifically classified so is considered classified as Fish and Wildlife use. There are no TMDLs listed for Brickyard Bayou. Water quality criteria for Fish and Wildlife use include bacteria, specific conductance, and total dissolved solids. It is not anticipated that fill within the project area will have an impact on these criteria given that measures to prevent run off of sediment and stormwater would be implemented during construction.
- Secondary (indirect) effects are defined in the EPA Regulations at 40 CFR Part 230.11. The EPA regulations state that "Secondary effects are effects on an aquatic ecosystem that are associated with a discharge of dredged or fill materials, but do not result from the actual placement of the dredged or fill material." No indirect effects are anticipated associated with the project.

5) Degree of compliance with State of Mississippi Water Quality Criteria for Intrastate, Interstate and Coastal Waters – Based on review of the STATE OF MISSISSIPPI WATER QUALITY CRITERIA FOR INTRASTATE, INTERSTATE, AND COASTAL WATERS adopted by Mississippi Commission on Environmental

Quality January 18, 2017, the project does not appear to have adverse impacts to the water quality criteria established for the State. The receiving stream is identified as Brickyard Bayou which arises in the vicinity of the airport and is a tributary to the Pascagoula River which is classified for Public Water Supply. Brickyard Bayou is not specifically classified so is considered classified as Fish and Wildlife use. There are no TMDLs listed for Brickyard Bayou. Water quality criteria for Fish and Wildlife use include bacteria, specific conductance, and total dissolved solids. It is not anticipated that fill within the project area will have an impact on these criteria given that measures to prevent run off of sediment and stormwater would be implemented during construction.

6) Degree of Physical, Chemical and Biological Impacts on Waters of the State –

Physical impacts – Anticipated physical impacts include filling of wetlands to elevate the potential structure out of the flood plain and allow construction. It is not possible at this time to estimate that amount of fill that would be required.

Chemical impacts – Give the nature of potential projects (construction of a building as associated parking areas) no chemical impacts are anticipated associated with potential projects.

Biological impacts – fill of wetlands would displace any biologic uses of the area. It is anticipated that any species present in the area will relocate to nearby undeveloped areas. See Initial Impacts - Endangered Species above.

7) The effect on circulation patterns and water movement on Waters of the State – Water movement may be temporarily altered by the introduction of fill material in the project area. Groundwater flow is anticipated to eventually return to pre-construction conditions. At this time, drainage calculations cannot be completed but will be included in any future design plans to provide that stormwater runoff is considered and managed appropriately in the project area.

8) Degree of alteration of the aquatic ecosystem – Alteration of the aquatic ecosystem will be associated with filling of wetlands in the project area. This will be a permanent alteration. This impact would be mitigated by purchase of credits from an approved mitigation bank.

9) Degree of consistency with approved water quality management plans adopted by the Commission – There is no specific water quality management plan for the project area. The Brickyard Bayou is the nearest receiving stream and is classified for Fish and Wildlife use. There is no TMDL for this receiving stream. During construction, TLIA would use Best Management Practices to prevent un-managed discharge to the environment.

10) Stormwater management – Since any potential development would be part of a larger plan of development, TLIA would prepare a Large Construction Notice of Intent (LCNOI) for any disturbance associated with construction. A Stormwater Pollution Prevention Plan would be prepared and submitted to MDEQ for review and approval and provided to the chosen contractor. Specific project details would be provided when a LCNOI and SWPPP for the project are submitted.

## Denial Factors

Per Rule 1.3.4A of Miss. Code 49-2-1 a decision to provide water quality certification may be denied if any of the following determinations are made unless the Department is assured that appropriate measures will be taken to eliminate unreasonable degradation and irreparable harm to waters of the State. Please see the review of the denial factors below.

1) The proposed activity permanently alters the aquatic ecosystem such that water quality criteria are violated and/or it no longer supports its existing or classified uses.

Review: The proposed project would be an aviation associated commercial facility. Best management practices would be utilized to prevent discharge of sediment during construction. Any wetland impacts would be offset by purchase of mitigation credits from an approved mitigation bank.

2) There is a feasible alternative to the activity which reduces adverse consequences on water quality and classified or existing uses of waters of the State.

Review: Any proposed project must have runway dependent characteristics such that operations could not occur without runway access or must provide direct support to aviation technology commerce. Alternative site designs would be required to ensure that the project impacts the least amount of wetlands.

3) The proposed activity adversely impacts waters containing State or federally recognized threatened or endangered species.

Review: Endangered Species – An updated Endangered Species Survey was conducted in October 2022 and provided to the US Fish and Wildlife Service. The survey identified potential habitat for the federally threatened red-cockaded woodpecker (*Picoides borealis*, RCW). Although trees potentially suitable for foraging and nesting are present, no RCW's nor their cavities were observed. The FWS concurred with the determination regarding the RCW. There are no records of this species within or near the TLIA and the fire-maintained, open-pine habitat required by the RCW appears to be absent within or adjacency to the TLIA.

The FWS indicated that the project area may provide suitable habitat for endangered Mississippi Sandhill Crane (*Grus canadensis pulla*). FWS indicated that they have numerous records of cranes using the mowed portions of the TLIA, which mimics the open-pine savannah habitat necessary for foraging and roosting. FWS recommended that this species be considered during the planning stages of all future activities at the TLIA, and avoidance and minimization measures be developed to avoid impacts to this species. TLIA agreed to consider the Mississippi Sandhill Crane in future planning.

No other potential habitat for endangered or threatened species was identified.

4) The proposed activity adversely impacts a special or unique aquatic habitat, such as Nation or State Wild and Scenic Rivers and /or State Outstanding Resource Waters.

Review: The project area is not located in a special or unique aquatic habitat.

5) The proposed activity in conjunction with other activities may result in adverse cumulative impacts.

Review: It is not possible to evaluate potential other activities at this time.

6) Non-point source/storm water management practices necessary to protect water quality have not been proposed.

Review: Best management procedures would be implemented to prevent erosion and deposition of sediment during construction activities. Post construction design will be considered during site planning activities.

7) Denial of wastewater permits and/or approvals by the State with regard to the proposed activities.

Review: A wastewater permit would be obtained from Jackson County as needed.

8) The proposed activity results in significant environmental impacts which may adversely impact waste quality.

Review: At this time significant environmental impacts are not anticipated. It is likely that an amount of wetlands would be filled to complete a project in the area and this fill would be mitigated for by purchase of credits from an approved mitigation bank.

## ATTACHMENTS

## General Site Location Map

**JACKSON COUNTY AVIATION TECHNOLOGY PARK (200 Acres ±)**

**LEGEND:**

Site Boundary



**JACKSON COUNTY AVIATION TECHNOLOGY PARK  
SITE BOUNDARY MAP  
JACKSON COUNTY, MS**

**JACKSON COUNTY AVIATION TECHNOLOGY PARK  
230 Acres ±**

WATERFORD COURTHOUSE  
HEADQUARTERS

MARKET LOUNGE  
MANAGEMENT

TANK LOT  
TRAINING  
LABORATORY

ALIGHT TOWER

LANDING & TAXI  
WAY  
1,800 LF  
W/ 200 LF  
W/ 200 LF

SARACENTIA ROAD

DECATUR ROAD

INTERSTATE 10

DECATUR ROAD

STATE ROAD 100

**COMPTON ENGINEERING, INC.**  
Engineering, Surveying, and Environmental Services  
P.O. Box 1000, Jackson, Mississippi 39207  
Phone: (601) 922-2070 Fax: (601) 922-2071



## Potential Developable Lots

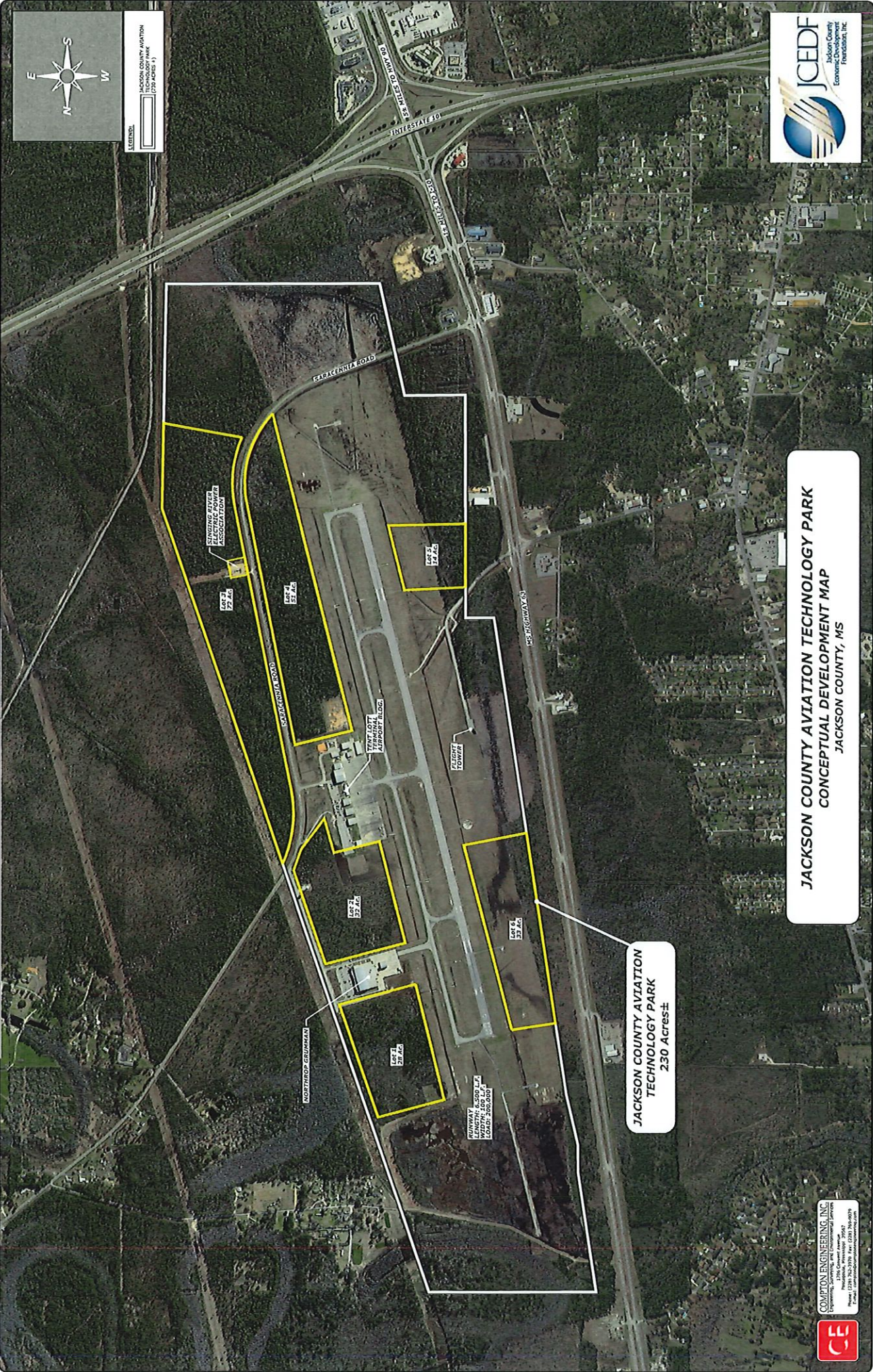
**JACKSON COUNTY AVIATION**  
 1375 JACKSON HWY  
 JACKSON, MS 39201

LEGEND:  
 [Symbol] JACKSON COUNTY AVIATION  
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**JACKSON COUNTY AVIATION TECHNOLOGY PARK**  
**CONCEPTUAL DEVELOPMENT MAP**  
 JACKSON COUNTY, MS

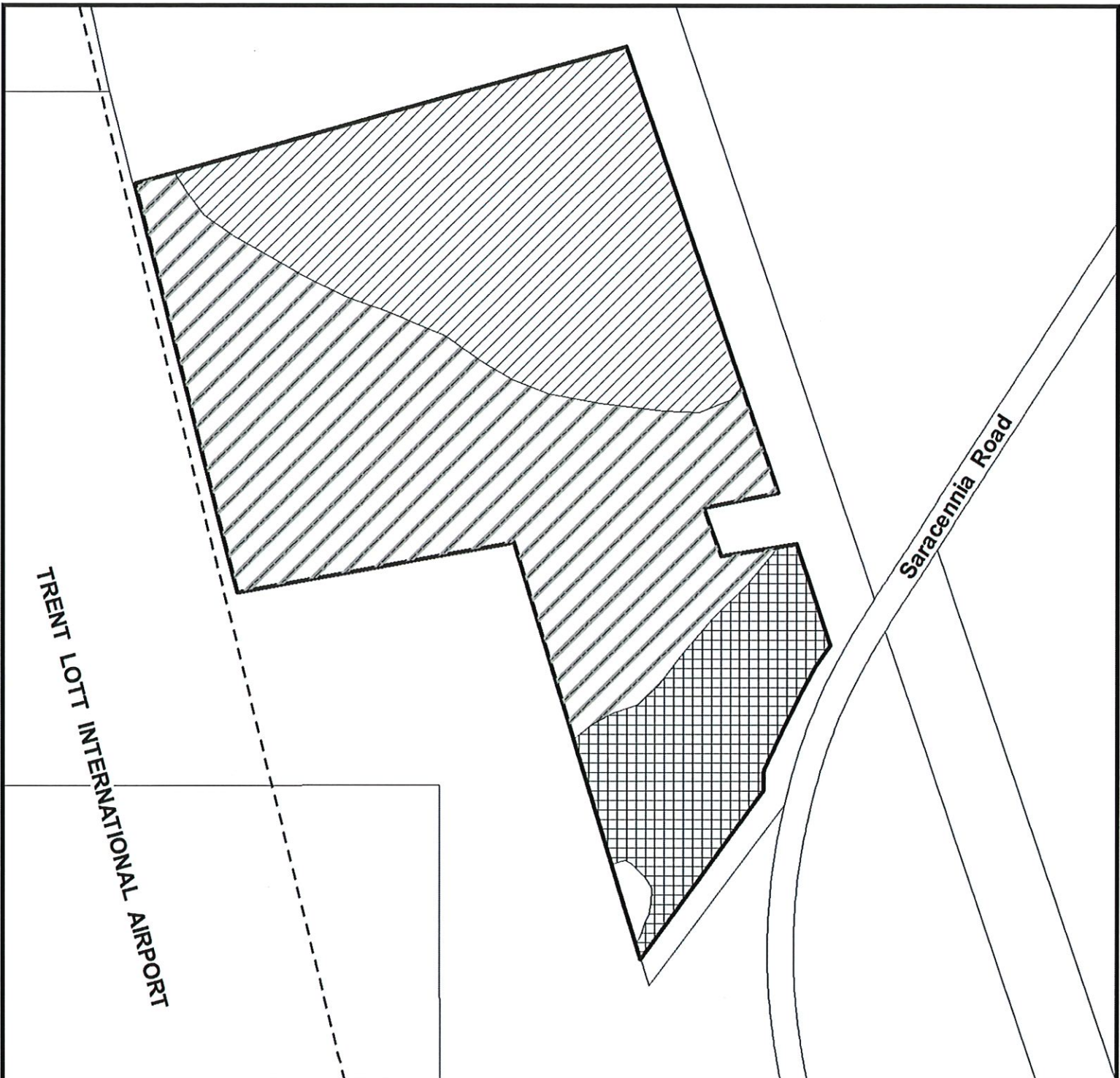
**JACKSON COUNTY AVIATION TECHNOLOGY PARK**  
 230 Acres±








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## 2023 Wetland Maps



 North - Low Quality Pine Savannah (+/- 9.63 ac)	 North - Medium Quality Pine Savannah (+/- 12.69 ac)
 North - Medium Quality Forested Wetland (+/- 3.79 ac)	 North Project Area (+/- 26.26 ac)
 Jackson Co. Tax Parcels	

Base Map: Jackson County Parcels  
 Source: Jackson County, MS  
 & EAM Field Data  
 Map Date: February 8, 2023



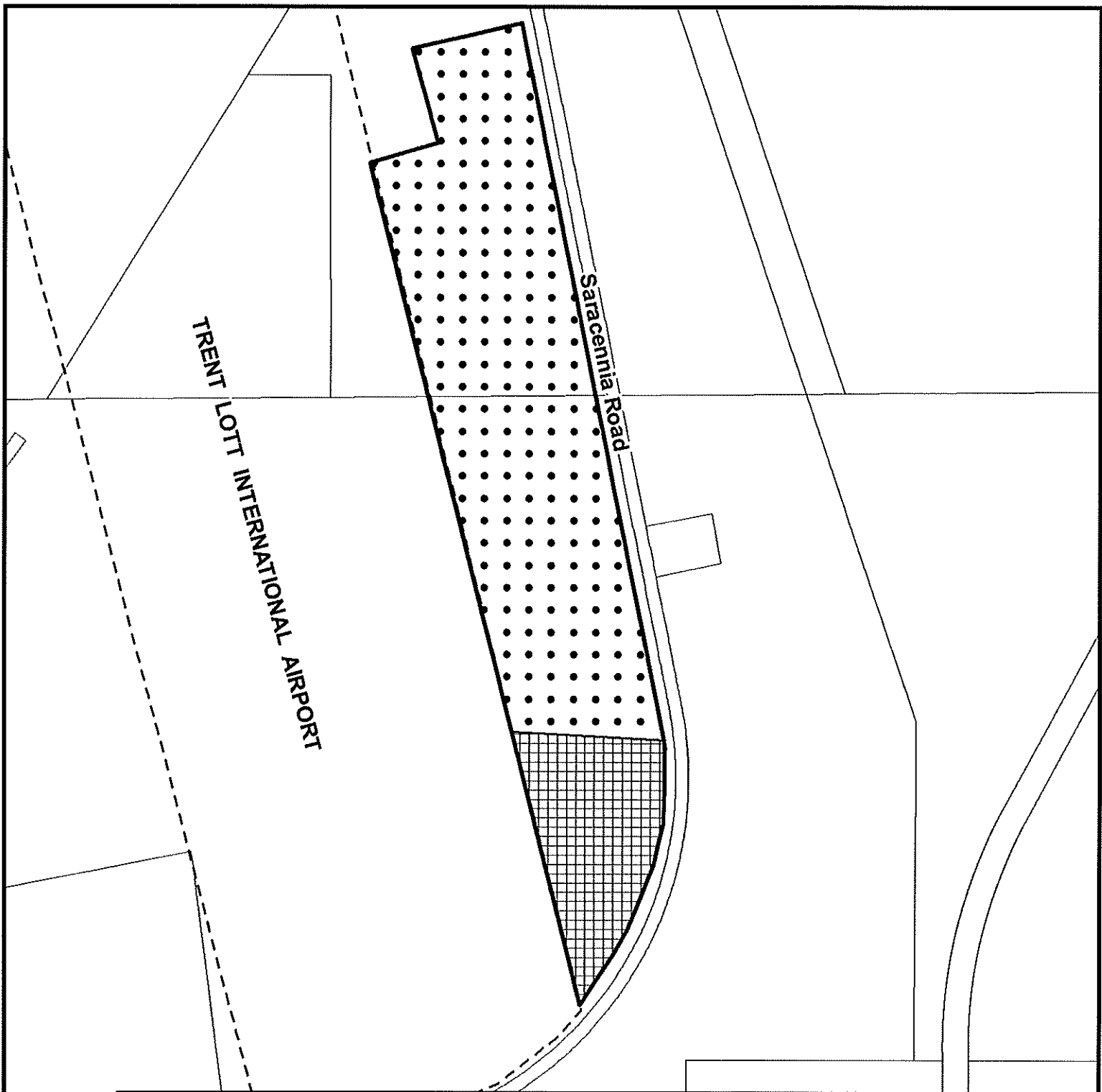
**HABITAT TYPE  
 MAP  
 (NORTH PROJECT AREA)**







**ECOLOGICAL  
 ASSET  
 MANAGEMENT, LLC**

**Wetland Delineation  
 for +/- 70 ac Project Areas  
 on Saracennia Road**

Location: Moss Point, MS  
 Portion of Sections 6 & 7  
 Township-7-South; Range-5-West  
 County: Jackson County, MS



	South - Low Quality Pine Savannah (+/- 38.05 ac)		South Project Area (+/- 46.87 ac)
	South - Medium Quality Forested Wetland (+/- 8.82 ac)		Jackson Co. Tax Parcels

Base Map: Jackson County Parcels  
 Source: Jackson County, MS  
 & EAM Field Data  
 Map Date: February 8, 2023



**HABITAT TYPE  
 MAP  
 (SOUTH PROJECT AREA)**

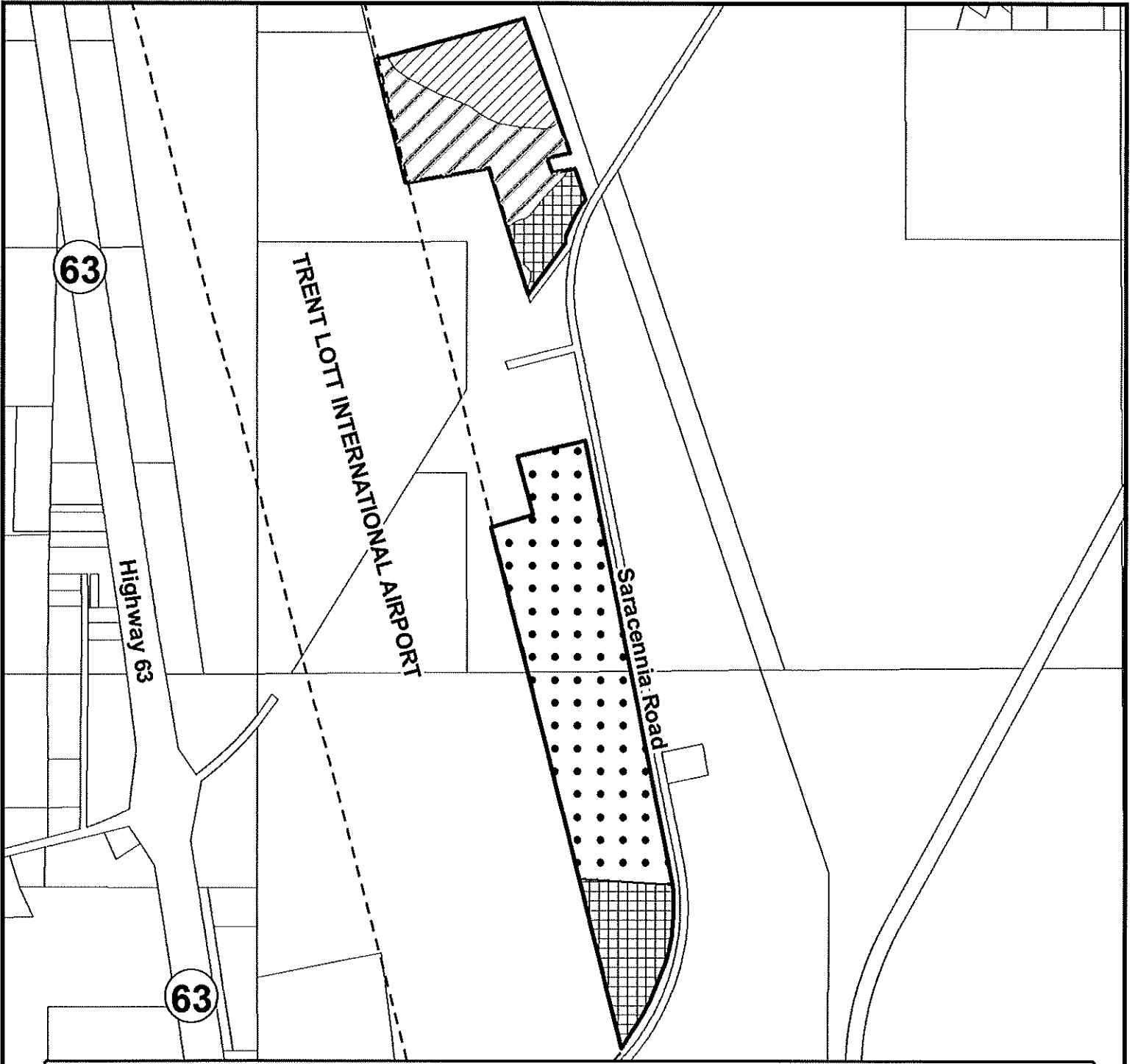


ECOLOGICAL  
 ASSET  
 MANAGEMENT, LLC

**Wetland Delineation  
 for +/- 70 ac Project Areas  
 on Saracennia Road**

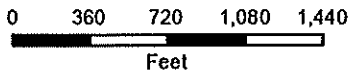
Location: Moss Point, MS  
 Portion of Sections 6 & 7  
 Township-7-South; Range-5-West  
 County: Jackson County, MS

NEW ID REQUEST



	North - Low Quality Pine Savannah (+/- 9.63 ac)		South - Low Quality Pine Savannah (+/- 38.05 ac)
	North - Medium Quality Forested Wetland (+/- 3.79 ac)		South - Medium Quality Forested Wetland (+/- 8.82 ac)
	North - Medium Quality Pine Savannah (+/- 12.69 ac)		South Project Area (+/- 46.87 ac)
	North Project Area (+/- 26.26 ac)		Jackson Co. Tax Parcels

Base Map: Jackson County Parcels  
 Source: Jackson County, MS  
 & EAM Field Data  
 Map Date: February 8, 2023



**HABITAT TYPE  
MAP**



ECOLOGICAL  
ASSET  
MANAGEMENT, LLC

**Wetland Delineation  
for +/- 70 ac Project Areas  
on Saracennia Road**

Location: Moss Point, MS  
 Portion of Sections 6 & 7  
 Township-7-South; Range-5-West  
 County: Jackson County, MS

## MDAH Concurrence

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June 27, 2022

Ms. Lisa D. Morrison  
Compton Engineering  
156 Nixon Street  
Biloxi, Mississippi 39530

RE: Request for Concurrence for the Jackson County Economic Development Foundation, Project No. 221-083.016, (DMR) MDAH Project Log #05-190-22, Jackson County

Dear Ms. Morrison:

We have reviewed your request for a cultural resources assessment, received on May 31, 2022, for the above referenced project, in accordance with our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After reviewing the information provided, it is our determination that no cultural resources are likely to be affected. If any cultural materials such as pottery, nails, glass, stone tools such as arrowheads, or animal bones are encountered, all work should cease and the Chief Archaeologist shall be notified within 24 hours so that the appropriate descendant communities can be consulted for a path forward in accordance with state and federal law. With this condition, we have no objection with the proposed undertaking.

Should there be additional work in connection with the project, or any changes in the scope of work, please let us know in order that we may provide you with appropriate comments in compliance with the above referenced regulations. If you have any questions, please do not hesitate to contact us.

Sincerely,



Hal Bell  
Review and Compliance Officer

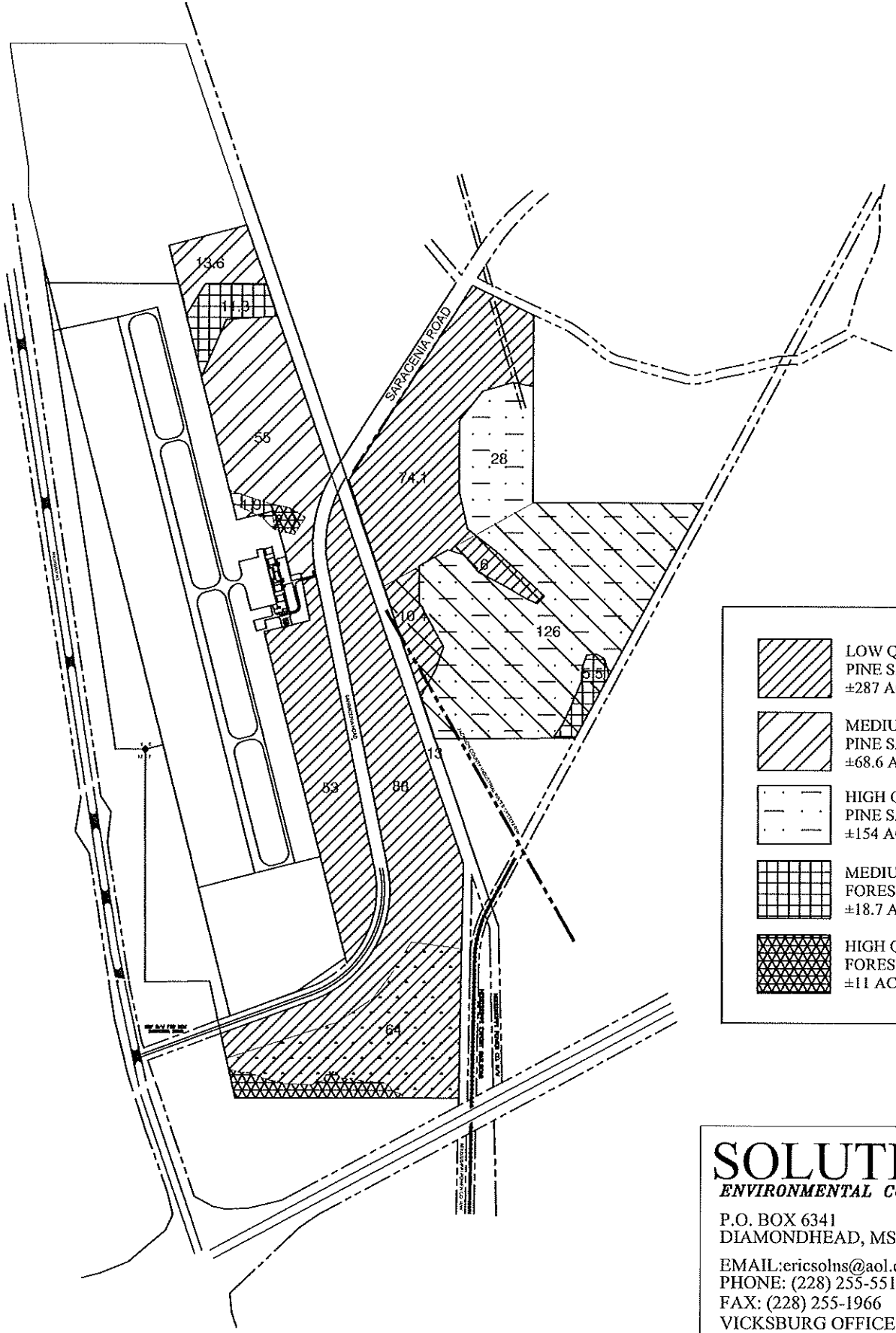
FOR: Katie Blount  
State Historic Preservation Officer






**Approved Wetlands by HGM in Original Permit**

# WETLAND TYPES AND QUALITY BASED ON HGM METHODOLOGY



1500'



	LOW QUALITY PINE SAVANNAH: ±287 ACRES
	MEDIUM QUALITY PINE SAVANNAH: ±68.6 ACRES
	HIGH QUALITY PINE SAVANNAH: ±154 ACRES
	MEDIUM QUALITY FORESTED WETLAND: ±18.7 ACRES
	HIGH QUALITY FORESTED WETLAND: ±11 ACRES

## SOLUTIONS<sup>INC.</sup> ENVIRONMENTAL CONSULTANTS

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