



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 28 2018

REPLY TO THE ATTENTION OF:

Christel Johnson  
National Guard Bureau  
NGB/A4AM, Shepperd Hall  
3501 Fetchet Avenue  
Joint Base Andrews, Maryland 20762-5157

**Re: Scoping comments for an Environmental Impact Statement for F-35A Aircraft Beddown at Truax Field, Madison, Wisconsin; Gowen Field, Boise, Idaho; Jacksonville International Airport, Jacksonville, Florida; Selfridge Air National Guard Base, Harrison Township, Michigan; and Dannelly Field, Montgomery, Alabama**

Dear Ms. Johnson:

EPA has reviewed the Notice of Intent to prepare an Environmental Impact Statement for the referenced project, dated February 7, 2018, which was prepared by the National Guard Bureau (NGB). Our review is pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The proposed project involves the beddown of two F-35A aircraft squadrons, each of which would contain eighteen F-35A aircraft and two backup aircraft inventory. NGB is proposing these beddown activities at two of the following candidate locations: Truax Field, Madison, Wisconsin; Gowen Field, Boise, Idaho; Jacksonville International Airport, Jacksonville, Florida; Selfridge Air National Guard Base, Harrison Township, Michigan; and Dannelly Field, Montgomery, Alabama. The proposed project would also include minor construction, demolition, and renovation activities.

We have some general recommendations that we believe will assist the development of the draft environmental impact statement (DEIS), including comments on water quality, wetlands and streams, stormwater management and resiliency, air quality strategies, noise, environmental justice and children's health, demolition, construction and renovation, previous analysis, pollinators, native plant species, right-of-way maintenance, best management practices, consultation records, and agency coordination and future NEPA documents, as stated below.

Water Quality

The DEIS should describe how the proposed action may affect nearby Clean Water Act (CWA) Section 303(d) listed impaired water bodies. We recommend that this section of the document

discuss current impairments, and how the proposed action may affect the impairment(s), either positively or detrimentally.

#### Wetlands and Streams

If applicable, the DEIS should discuss how sequencing established by the Clean Water Act Section 404(b)(1) guidelines was applied, namely, impact avoidance first, then demonstration of impact minimization, then mitigation for unavoidable, minimized impacts. A discussion on proposed mitigation for unavoidable, minimized stream impacts should also be included in the DEIS.

#### Stormwater Management and Resiliency

One-hundred-year storm events are occurring with increasing frequency. The number of storm events occurring with greater intensity is also increasing. We recommend that NGB account for increased storm frequency and intensity in the design of this project in order to help ensure the health and safety of the public by using appropriate airport-specific stormwater management designs. As a measure to reduce or eliminate the need for traditional stormwater management infrastructure, we strongly encourage use of “green” stormwater management features where appropriate, such as permeable pavement and bioretention, which are listed in the attachment *NEPA Stormwater Green Sheet*.

#### Air Quality Strategies

As a measure to reduce or eliminate construction-related air emissions as part of the proposed action, several recommendations are included in an enclosure entitled, *U.S. Environmental Protection Agency Diesel Emission Reduction Checklist*.

#### Noise

EPA recommends the DEIS include a comprehensive noise analysis and monitoring program to ensure that the ongoing impacts from military training, including the proposed F-35 operations, are assessed, appropriately addressed, and mitigated for, if necessary.

#### Environmental Justice and Children's Health

EPA recommends identifying any nearby communities living with environmental justice (EJ) concerns. Specific EJ concerns should be identified in the DEIS, and, if applicable, steps that are to be taken to avoid or reduce impacts to those communities.<sup>1</sup> We also recommend NGB consider potential health impacts relating to children and other susceptible populations.<sup>2</sup>

#### Demolition, Construction, and Renovation

The DEIS should discuss the need for additional infrastructure or support facilities if additional personnel and their families are to be relocated as part of the proposed beddown. Any new construction, renovation, or demolition that is necessary in order to satisfy operational needs should be discussed in the DEIS. For demolition and renovation projects, we recommend structural materials be reclaimed for reuse, or recycled, to the maximum extent possible. For new construction and renovation, we urge NGB to consider using energy efficient building materials,

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<sup>1</sup> For more information relating to environmental justice, see Executive Order 12898.

<sup>2</sup> For more information relating to children's health, see Executive Order 13045, and the last bullet in the enclosed document titled “U.S. Environmental Protection Agency Diesel Emission Reduction Checklist.”

including (but not limited to) installation of south-facing windows and skylights, motion-sensored lighting, and Energy Star appliances. We also recommend installation of renewable sources of energy, such as solar panels or geothermal, if environmental conditions are appropriate.

#### Previous Analysis

The project website indicates that a previous analysis conducted by the U.S. Air Force identified Truax Field and Dannelly Field as the two preferred beddown site. We recommend that that analysis be included as an appendix to the DEIS, and briefly described in the DEIS text. The DEIS should discuss alternative selection criteria and the rationale for each alternative location to be retained or dropped.

#### Pollinators, Native Plant Species, and Right-of-Way Maintenance

We encourage NGB to implement the 2014 Presidential Memorandum entitled, “Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators<sup>3</sup>,” which responds to evidence of steep declines in certain pollinator populations. Pollinators are critical contributors to our nation’s economy, food system, and environmental health. Vegetation within the project area can provide much needed habitat for pollinators, providing food, shelter, and connections to other patches of habitat. Maintenance staff and landscape designers can all take steps to improve the quality of vegetation to benefit pollinators, steps that can also reduce costs, maintain public safety, and improve public good will. We recognize that any habitat that is created or preserved at or near the flight line must conform to FAA and Department of Defense practices to minimize the risk of wildlife hazards to aircraft.

#### Best Management Practices

Best management practices (BMPs) should be used for all environmental, health, or EJ impacts that are presented in the DEIS, and appropriately enforced.

#### Consultation Records

For each of the potential beddown locations, EPA recommends the DEIS attach interagency consultation documents regarding historic and cultural resources, wetlands and streams, and Federal and state threatened and endangered species.

#### Agency Coordination and Future NEPA Documents

We request NGB coordinate with the three EPA offices listed below. In addition to filing future NEPA documents electronically at <https://cdx.epa.gov/>, we request 1 CD version of future NEPA documents be mailed to EPA Region 5, and 1 CD version and 1 paper version be mailed to EPA Region 4, at the following addresses:

Mike Sedlacek  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency Region 5  
77 W. Jackson Blvd.  
Chicago, IL 60604

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<sup>3</sup> [www.whitehouse.gov/briefing-room/presidentialactions/presidential-memoranda](http://www.whitehouse.gov/briefing-room/presidentialactions/presidential-memoranda)

Larry Gissentanna  
National Environmental Policy Act (NEPA) Program Office  
U.S. Environmental Protection Agency Region 4  
61 Forsyth Street SW  
Atlanta, Georgia 30303-8960

No copies of future NEPA documents are requested by EPA Region 10, however, please include Jennifer Curtis in any official communication via email at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov).

We are available to discuss these comments on the scoping document at your convenience. Please feel free to contact Mike Sedlacek of my staff at 312-886-1765, or by email at [sedlacek.michael@epa.gov](mailto:sedlacek.michael@epa.gov).

Sincerely,



Kenneth A. Westlake, Chief  
NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

Encl: NEPA Stormwater Green Sheet  
U.S. Environmental Protection Agency - Diesel Emission Reduction Checklist

## NEPA Stormwater Green Sheet

The Stormwater/Wastewater section of NEPA documents should (at a minimum) address the following:

- ✓ How will wastewater from the facility be managed? Is there a new or increased discharge of pollutants to a sensitive water body (e.g., a high quality water body, or a water body that is already impaired)?
- ✓ How will stormwater runoff from the building, parking lot, and other impervious surfaces be managed?
  - ✓ In most cases if more than one acre of land will be disturbed the project owner/operator will need to obtain NPDES permit coverage for stormwater runoff during the construction phase.
  - ✓ Most Region States have general permits for stormwater runoff from construction sites, and most sites qualify for coverage under the general permit.
  - ✓ The permit will require minimizing erosion and minimizing releases of sediment. If the site is immediately adjacent to a water body there should be a buffer area between the construction activity and the water body.
  - ✓ Post-construction requirements vary by jurisdiction. At this time there is no quantified Federal performance standard for runoff from the new impervious areas that will be created. Some States, e.g., WI, have a performance standard. Also, many municipalities have release rate requirements for stormwater. These rate restrictions are intended to keep the sewer systems from being overloaded from too much flow coming in all at once. Local release rate are the reason detention basins are put in place at new development sites.
  - ✓ If the project involves construction of a Federal building/structure, the provisions of the Energy Independence and Security Act of 2007 likely will be applicable. Title IV of the Act ("Energy Savings in Building and Industry"), Subtitle C "(High Performance Federal Buildings)" establishes this requirement:

*SEC. 438. STORMWATER RUNOFF REQUIREMENTS FOR FEDERAL DEVELOPMENT PROJECTS*

*The sponsor of any development or redevelopment project involving a Federal facility with a footprint that exceeds 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.*

This provision for many projects can be quite significant. This language requires Federal sites to achieve/maintain the predevelopment hydrology to the "maximum extent technically feasible". For many sites what this will mean is practices must be put in place to store/soak in the first 1 to 1.5 inches of rain that falls in a large rain event (rather than having that water run off). Sites will need to include practices such as rain gardens and permeable pavement in order to do this.

## U.S. Environmental Protection Agency - Diesel Emission Reduction Checklist

- Use low-sulfur diesel fuel (15 ppm sulfur maximum) in construction vehicles and equipment.
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- 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 catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- 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.
- Regularly maintain diesel engines, which is essential to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Repower older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards. Purchase new vehicles that are equipped with the most advanced emission control systems available.
- Use electric starting aids such as block heaters with older vehicles to warm the engine reduces diesel emissions.
- 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 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 NIOSH approval number.
- Per Executive Order 13045 on Children's Health<sup>4</sup>, EPA recommends operators and workers pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, daycare centers, and playgrounds. Diesel emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.

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<sup>4</sup> 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.