



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 23, 2008

Emmy Andrews
Pacific Facilities Service Office
United States Postal Service
395 Oyster Point Boulevard, Suite 225
South San Francisco, CA 94080-0300

Subject: Draft Environmental Impact Statement/Environmental Impact Report for the Proposed Construction and Operation of a Mail Processing Facility in Aliso Viejo, Orange County, California (CEQ # 20080282)

Dear Ms. Andrews:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. EPA previously provided scoping comments for this project on March 6, 2008. Based on our review, we have rated the Draft Environmental Impact Statement (DEIS) for the proposed project as Environmental Concerns – Adequate Information (EC-1). Please see the enclosed "Summary of EPA Ratings." While we note that residents in the vicinity of the proposed facility may have significant concerns about impacts such as noise and changes in the visual environment, our comments below focus on those issues in which EPA has expertise and regulatory authority.

EPA notes that all mitigation measures included in the DEIS are described as measures that the United States Postal Service (USPS) *could* implement. We recommend that the Final Environmental Impact Statement (FEIS) and subsequent record of decision (ROD) include commitments to those measures. EPA is particularly concerned with ensuring that the FEIS includes commitments to the following mitigation measures:

Recommended Mitigation Measures

Site Stability

- Commit to implementing the recommendations of the geotechnical investigation report to mitigate the potential impacts of slope failure.

Stormwater Management and Water Conservation

- Commit to the best management practices (BMPs) and other mitigation measures listed in the DEIS to minimize impacts to water resources. In particular, EPA recommends that the USPS commit to constructing retention basins and other stormwater collection infrastructure to contain runoff from the site. As stated in our scoping comments, we recommend the use of “green infrastructure” such as bioretention areas, vegetated swales, porous pavement, and filter strips whenever possible. These features, in concert with other landscaping, could serve as both stormwater treatment and as a landscape buffer between the facility and the surrounding community.
- Commit to water conservation efforts, including use of native, drought-resistant plants in landscaping on the site, minimizing irrigation of landscaping, and utilizing recycled and reclaimed water for landscaping and other uses, as practical.

Wildlife Protection

- Commit to having a qualified biologist conduct a preconstruction survey for nesting birds within the property and within 100 feet of any proposed construction activity, and consulting with the U.S. Fish and Wildlife Service if nesting birds are found.

Waste Prevention and Recycling

- Commit to an active recycling and waste prevention program with aggressive goals for minimizing the amount of material sent to the landfill.

Air Quality

While the air quality analyses in the DEIS indicate that the project will not have significant impacts, EPA recommends the following additional mitigation measures to minimize potential impacts on air quality from construction and operation of the facility.

- Maximize use of newer vehicles, both in construction and operation of the facility, that can use improved, lower-emission diesel technology or alternative fuels, such as liquefied natural gas, fuel cells, or hybrid technologies. All diesel-powered alternatives should include installation of effective emission control systems on newer vehicles, and replacement of the oldest vehicles in the fleet with less polluting vehicles.
- Commit to minimizing unnecessary idling, both of construction equipment during the construction phase and of mail delivery trucks during loading and unloading operations at the site.
- Create a traffic management plan that will minimize queuing of trucks at the facility entrance.

In addition, we note that page 3-15 of the document states that the South Coast Air Basin is in nonattainment for carbon monoxide. The area is in attainment for that pollutant.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Carolyn Mulvihill of my staff at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosure:
Summary of EPA Rating Definitions