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

June 15, 2004

Raymond H. Marler, Director
Strategic Programs
U.S. Army - National Training Center
PO Box 10309 (ATTN: SDEIS Comments)
Fort Irwin, CA 92310

Subject: Supplemental Draft Environmental Impact Statement (SDEIS), Army National Training Center, Addition of Maneuver Training Land, Fort Irwin, San Bernardino County, California (CEQ # 040167)

Dear Mr. Marler:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) Implementing Regulations (40 CFR Parts 1500-15508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The proposed action is to acquire additional lands to expand Fort Irwin's maneuverable training area. The SDEIS fully evaluates five action alternatives and No Action. Alternative I is the Army's "Preferred Alternative." The SDEIS supplements a Draft EIS (DEIS) issued by the Bureau of Land Management (BLM). EPA provided comments on BLM's DEIS on June 2, 1997, rating it Environmental Concerns - Insufficient Information (EC-2).

EPA's review of the SDEIS identifies environmental concerns on (1) quantifying and, as appropriate, mitigating construction-related air emissions; and (2) ensuring proper reporting of an oil spill or release of a hazardous substance into the environment. EPA rates the SDEIS and Army's Preferred Alternative as EC-2. Please see the enclosed "Summary of EPA Rating Definitions" for further information on our rating system.

We appreciate the opportunity to comment. Please send one copy of the Final EIS (FEIS) to the letterhead address (mailcode: CMD-2) when available. If you have questions, please contact my staff reviewer, David Tomsovic, at 415-972-3858 or < tomsovic.david@epa.gov >.

Sincerely,

/s/ Laura Fujii for

Lisa B. Hanf, Manager
Federal Activities Office

Enclosures: 2
"Summary of EPA Rating Definitions"
EPA's Detailed Comments

U.S. EPA Comments on Supplemental Draft Environmental Impact Statement (SDEIS), Army National Training Center, Addition of Training Land, Fort Irwin, San Bernardino County, CA - June 15, 2004

Air Quality

Quantifying and Mitigating Construction Emissions

Roads and towers would be constructed to monitor training exercises (p. 4-51). The SDEIS states that construction emissions are "minimal" compared to operational emissions, are not quantified, and "will not be discussed further." (p. 4-51). The project area is "nonattainment" under the Clean Air Act for ozone and particulate matter less than 10 microns in diameter (PM-10). Construction results in emissions of PM-10, oxides of nitrogen (NOx), volatile organic compounds (VOC), carbon monoxide (CO), hydrocarbons (HC), and diesel particulate matter (DPM). NOx and VOC are ozone precursors.

Appendix E evaluates Clean Air Act general conformity requirements. Since the project area is "nonattainment" for PM-10 and ozone, Appendix E evaluates whether emissions of PM-10, VOC, and NOx are consistent with the State Implementation Plan. Appendix E evaluates three major PM-10 sources: (1) dust generated by tanks and trucks during training; (2) vehicle exhaust emissions; and (3) wind erosion from disturbed surface areas.

Neither the SDEIS nor Appendix E quantifies construction emissions or proposes mitigation to reduce such emissions. Under general conformity, a Federal project's construction emissions should be documented and, as appropriate, mitigated (e.g., see "General Conformity Guidance: Questions and Answers," EPA, Office of Air Quality Planning and Standards, July 13, 1994, at < http://www.epa.gov/ttn/oarpg/conform/gcgqa_71394.pdf >). The Council on Environmental Quality (CEQ) indicates that relevant, reasonable mitigation that could improve a project should be presented in an impact statement (CEQ, March 23, 1981, Forty Most Asked Questions Concerning CEQ's Regulations). CEQ has also issued guidance on integrating pollution prevention measures in documents prepared under the National Environmental Policy Act (NEPA) (CEQ, January 12, 1993, Pollution Prevention and NEPA).

Recommendations:

The Final EIS (FEIS) should quantify expected construction emissions for each fully evaluated action alternative. Appendix E should be modified to quantify construction emissions of PM-10, VOC, and NOx. The FEIS should, as appropriate, mitigate construction-related emissions of applicable nonattainment pollutants and precursors. The FEIS should also evaluate the feasibility of mitigation to reduce other air pollutants (e.g., DPM), and, if recommended for adoption, provide appropriate commitments for implementation in the NEPA Record of Decision.

Several Federal agencies have integrated construction-related air quality mitigation in

NEPA actions. The National Aeronautics and Space Administration (NASA) adopted measures in a NEPA Record of Decision for *NASA Ames Development Plan, California*. Incorporating such mitigation strengthens the Army's leadership role in environmental stewardship and pollution prevention. For this project, mitigation is especially appropriate in reducing PM-10, VOC, and NOx. The following mitigation may reduce construction-related emissions:

Reducing Construction-Related Fugitive Dust Emissions

$ Applying water during earthmoving activities such as road building.
$ Stabilizing open storage piles by covering and/or applying water.
$ Stabilizing inactive disturbed areas by applying water and ensuring that such areas are stabilized (e.g., crusted) at all times, especially during high wind conditions.
$ Stabilizing unpaved haul/access roads and parking/staging areas by applying water or dust suppressants.
$ Paving and/or applying gravel (gravel size of 1.5" at minimum depth of 4 inches) to areas disturbed by vehicular traffic.
$ Developing and implementing a fugitive dust control plan.

Reducing Exhaust Emissions from Construction Equipment

$ Reducing emissions of air pollutants by using particle traps or other methods. Control technologies such as traps control approximately 80 percent of DPM emissions. Specialized catalytic converters (oxidation catalysts) control approximately 20 percent of DPM emissions, 40 percent of CO emissions, and 50 percent of HC emissions.
$ Ensuring that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use.
$ Prohibiting engine tampering to increase horsepower.
$ Locating diesel engines, motors, and equipment as far as possible from residential areas or sensitive receptors.
$ Requiring low sulfur diesel fuel (<15 parts per million) if available.
$ Reducing construction-related trips of workers and equipment, including trucks.
$ Leasing or buying newer, cleaner equipment (1996 or newer model), using a minimum of 75 percent of the equipment's total horsepower.
$ Using engine types such as electric, liquified gas, hydrogen fuel cells, and/or alternative diesel formulations.

Reducing Both Source Categories (Fugitive Dust and Exhaust Emissions)

$ Working with the air pollution control district to develop the best available mitigation for reducing construction-related emissions.
$ Adopting a "Construction Emissions Mitigation Plan" to monitor construction-related emissions.

Release of a Hazardous Substance or an Oil Spill

Pages 4-6 and 4-7 describe Fort Irwin's program to respond to an oil spill or release of a hazardous substance. The SDEIS states, "If groundwater is threatened due to a hazardous substance spill the Regional Water Quality Control Board is contacted immediately in accordance with the Fort Irwin Spill Prevention, Control, and Countermeasures Plan." The SDEIS does not fully reflect applicable Federal requirements (40 CFR Part 112) to report an oil spill or release of a hazardous substance to the National Response Center.

Recommendations:

The FEIS should be modified to reflect requirements on reporting an oil spill or release of a hazardous substance. Fort Irwin's Spill Prevention Plan should be modified as necessary (i.e., requirement to contact the National Response Center). To report a hazardous substance release or oil spill, the responsible entity needs to contact the Federal Government's National Response Center (NRC) at 1-800-424-8802. The NRC is staffed 24 hours a day by the Coast Guard. Reporting information is at < http://www.epa.gov/oilspill/oilhow.htm > and includes:

$ Name and address of responsible party;
$ Location, date and time of incident;
$ Source and cause of release or spill;
$ Types and quantity of material(s) released into environment;
$ Danger or threat posed by release or spill;
$ Number and types of injuries;
$ Weather conditions at site of incident;
$ Information to assist emergency personnel in responding to incident.

Federally-Listed Species

Page 1-8 states that two Federally-listed species in the project area required consultation with the Fish and Wildlife Service (Service). A Biological Assessment was provided to the Service in July 2003. A March 2004 Draft Biological Opinion provided the Service's findings as "No Jeopardy, No Adverse Modification." The SDEIS does not address whether reasonable and prudent mitigation measures are associated with this opinion.

Recommendation:

The FEIS should identify mitigation measures associated with the Service's opinion.