UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

November 6, 2012

Naval Facilities Engineering Command, Northwest
ATTN: Mrs. Amy Burt,
NWSTF Boardman EIS Project Manager
1101 Tautog Circle, Suite 203
Silverdale, Washington 98135-1101

Re: U.S. Environmental Protection Agency (EPA) Comments on the U.S. Department of the Navy's (Navy) Naval Weapons Systems Training Facility Boardman (NWSTF) Draft Environmental Impact Statement (DEIS). (EPA Project Number: 10-052-DOD)

Dear Mrs. Burt

The EPA has reviewed the Navy's August 2012 NWSTF DEIS and we are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

First, we recognize the Navy and Oregon National Guard's need to conduct training and testing at NWSTF Boardman. We also appreciate and support your responsiveness to our November 15, 2010 scoping comments on "Standards of Significance". The DEIS's "Determination of Significance" sub-sections provide a useful example for how lead agencies can focus NEPA analyses on significant environmental issues.

Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned an Environmental Concerns – Insufficient Information (EC-2) rating to the DEIS. A copy of the EPA rating system is enclosed.

Washington Ground Squirrel

Our "EC – Environmental Concerns" rating means that we have identified an environmental impact that should be avoided in order to provide full protection of the environment, namely, local declines in Washington ground squirrel populations from increased training activities. Our concern for local declines in Washington ground squirrel populations is based on an overall recognition of the relationship between protecting rare species and the protection of ecological values such as biodiversity.[1] Our concern is also based on the EIS's summary finding that NWSTF Boardman - along with the adjacent Boardman Conservation Area - provides "extremely important habitat" and likely supports the majority of Oregon's remaining populations.[2]

[1] See, for example, The Council on Environmental Quality's 1993 report, "Incorporating Biodiversity Considerations into Environmental Impact Analysis Under the National Environmental Policy Act"
[2] DEIS, p. 3.6-13

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The DEIS's wildlife related Proposed Best Management Practices; Monitoring; and, Mitigation Measures show the Navy's substantial efforts to address wildlife concerns.[3] We particularly support the Navy's work with stakeholders to - for example - update the NWSTF Boardman Integrated Natural Resources Management Plan. To ensure that the Integrated Natural Resources Management Plan's updates fully address our concerns about effects to wildlife and biodiversity – such as local declines in Washington Ground Squirrel populations – we recommend that the Final EIS describe proposed decision points and metrics to support adaptive management.

Aircraft Noise and Accumulation of Expended Materials and Metals

Our "Category 2 - Insufficient Information" rating means that we have identified information that we believe should be included in the Final EIS. Our information concerns are detailed below and relate to the potential for significant acoustic impacts from aircraft activities, and, the potential for long-term effects to soils and groundwater from ongoing and increased accumulation of expended materials and metals.

Aircraft Noise

We agree that the contribution of existing and proposed sound from aircraft activities to overall hourly community noise levels would be extremely low. We remain concerned, however, about effects to sensitive receptors (especially elementary age children) and cultural resources (especially Traditional Cultural Properties) from discrete intrusive sound events which may cause temporary distraction or annoyance. To address this concern, we recommend that the FEIS include additional information on the effects of discrete sound events.

Expended Materials and Metals

The DEIS's descriptions of the Range Sustainability Environmental Program Assessment[4] and Operational Range Clearance[5] are generally responsive to our scoping comments on hazardous waste but we remain concerned about long-term effects from ongoing and increased accumulation of materials and metals on the range. In order to confirm the EIS's conclusions and ensure that significant impacts to soils and groundwater do not occur, we recommend that the final EIS include a commitment to provide proposed range assessment sampling plans to the EPA and Oregon Department of Environmental Quality for review and comment.

The final EIS should also include a discussion of how proposed range assessments could include the following sampling activities:

- sample surface soils in the open detonation area for metals (EPA Method 6010), TNT, RDX, HMX and other explosive constituents and gun propellants (EPA Method 8330B), and perchlorate (EPA Method 6860);
- sample surface soils in launch areas for munitions using propellants (to the rear of the launch location) for DNT, nitroglycerin, and perchlorate;
- sample inside major craters or visibly disturbed areas within the target zone for various munitions - for metals and explosives,
- sample firing berms for small arms munitions for metals; and,

[3] DEIS, p. 5-13Up
[4] DEIS, p. 3.1-4
[5] DEIS, p. 3.1-5

- continue sampling of all perimeter and on site wells for metals, RDX and perchlorate.

The EPA has communicated related sampling methodology and lab methods to the Navy in a July 27, 2006 joint letter from Oregon Department of Environmental Quality.[6] For additional information please see the July 2012 "EPA Federal Facilities Forum Issue Paper: Site Characterization for Munitions Constituents".[7]

Thank you for this opportunity to provide comments and if you have any questions, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

Christine B. Reichgott

Christine Reichgott, Unit Manager
Environmental Review and Sediment Management Unit

Enclosures
EPA Rating System for Draft Environmental Impact Statements

[6] To obtain a copy of this letter contact Ken Marcy in EPA R10's Office of Environmental Cleanup at 206-890-0591
[7] http://www.epa.gov/fedfac/pdf/site_characterization_for_munitions_constituents.pdf, and, http://www.clu-in.org/conf/tio/munitions/

U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.