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

2/14/2011

Mr. Kent Randall
Naval Facilities Engineering Command, Southwest
Code OPME
2730 McKean St. Bldg. 291
San Diego, CA 92136-5198

Subject: Silver Strand Training Complex, Final Environmental Impact
San Diego County, CA (CEQ # 201100010)

Dear Mr. Randall:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the Navy on March 9, 2010. We rated the DEIS as Environmental Concerns (EC-2) primarily due to our concerns about potential impacts to water resources, biological resources, and the need for waste minimization. We commend the Navy for working with the U.S. Fish and Wildlife Service on the development of a Biological Opinion, and its incorporation into the FEIS. The Biological Opinion, and its monitoring provisions, addressed many of the concerns about biological resources. We also appreciate the clarification provided in the response to comments regarding the training tempo.

EPA remains concerned about sediment quality. In our DEIS comment letter, we recommended additional discussion of sediment sampling. In response, the FEIS states, that earlier sediment sampling "characterize(d) the general quality of a large quantity of Bay sediments intended for ocean disposal. (F-159)" The proximity of the sampling sites to the Silver Strand Training Complex (SSTC) is not clear, and we are concerned that the Navy will conduct training that continually resuspends sediment (p. 3.5-25), yet has no sediment data from the specific training area. On the subject of missing information, the Council on Environmental Quality's NEPA regulations at 1502.22(a) state:

> "If the incomplete information relevant to reasonably foreseeable significant adverse impacts is essential to a reasoned choice among alternatives and the overall costs of obtaining it are not exorbitant, the agency shall include the information in the environmental impact statement."

EPA recommends the Navy's Record of Decision (ROD) include a provision for the characterization of SSTC sediment, and include a mitigation measure, if necessary, to minimize resuspension of contaminated sediment.

EPA also recommended an assessment of the potential to reduce explosive charges in meeting the Navy's training needs. The Navy responded that "a reduction in underwater mine countermeasures was considered but eliminated because it would not support the Navy's ability to meet training requirements . . . (page F-161). We wish to clarify that our recommendation was to reduce, if feasible, the quantity of explosives used, not the number of exercises using explosives. It is not clear that the use of smaller charges would alter the type or training tempo at the SSTC. We continue to recommend the Navy assess the potential to reduce explosive charges, and recommend the Navy include this as mitigation measure in the ROD.

EPA also recommends that all mitigation measures, including specific criteria for successful mitigation, be adopted in the ROD. If any mitigation measures in the FEIS are not adopted, the ROD should provide justification for the decision not to adopt them.

We appreciate the opportunity to review this FEIS and look forward to continued coordination with the Navy. When the ROD is signed, please send a copy to the address above (Mail Code: CED-2). If you have any questions, please contact Tom Kelly, the lead reviewer for this project, at (415) 972-3856 or kelly.thomasp@epa.gov, or me at (415) 972-3521.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

cc: Amy Kelley, Naval Facilities Engineering Command Southwest