May 31, 2007

Mr. Robert Dogan
NGB/A7CVN
Conaway Hall
3500 Fetchet Avenue
Andrews AFB 20762-5157

RE: Comments on Draft Environmental Impact Statement for the Proposed Implementation of the Base Alignment and Closure (BRAC) Final Recommendations and Associated Actions for the 104th Fighter Wing, Massachusetts Air National Guard at Westfield-Barnes Airport, Westfield, Massachusetts (CEQ # 20070141)

Dear Mr. Dogan:

The Environmental Protection Agency-New England Region (EPA) has reviewed the National Guard Bureau's (NGB) Draft Environmental Impact Statement (DEIS) for the actions at the Westfield-Barnes Airport, Westfield, Massachusetts. We submit the following comments on the Draft Environmental Impact Statement (DEIS) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS describes the work necessary to implement the 2005 BRAC Commission Final and Approved Recommendations which when implemented will convert aircraft using the airport from the A-10 to the F-15. Work described in the DEIS includes the upgrades to various existing buildings on the airport including the aircraft maintenance hanger, additions/alterations to the existing fire crash/rescue station, installation of aircraft arresting systems, modifications to the squadron operations facility, additions to the munitions storage and maintenance complex and other improvements to support the aircraft conversion at the airport. The primary impact identified in the DEIS associated with the proposed action is an increase in noise from the transition to the F-15 aircraft at the airport. According to the DEIS, an additional 1307 acres of land on and surrounding the airport will be exposed to sound levels above a Day-Night Average Sound Level of 65 decibels. This increase in noise will directly impact an estimated 261 households within an existing mobile home park to the west of the airport.

We appreciate the opportunity to comment on the DEIS for the proposed actions at the Westfield-Barnes airport. Based on our review of the DEIS we note that noise impacts to the communities surrounding the airport are significant and will require significant mitigation. To that end, we strongly encourage the NGB to work closely with the host

communities and the neighborhoods that will be impacted by noise increases from the conversion to specifically identify and explain the impacts and potential mitigation measures in the FEIS. It would serve the NGB well to support efforts to document these impacts and potential mitigation measures in the FEIS with a comprehensive public involvement program that educates and involves the affected residents. These efforts appear warranted given the explanation in the DEIS that "mobile homes cannot be sound insulated and are normally purchased and removed." (DEIS page 4-7) Based on our review of the proposed work we have rated the DEIS "EC-1—Environmental Concerns-Adequate" in accordance with EPA's national rating system, a description of which is attached to this letter.

Please contact Timothy Timmermann (617-918-1025) of EPA's Office of Environmental Review with any comments or questions about this letter.

Sincerely,

/s/

Robert W. Varney
Regional Administrator

Attachment

Summary of Rating Definitions and Follow-up Action

Environmental Impact of the Action

LO--Lack of Objections
The 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
The 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 the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that must 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
The 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 potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the 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 or 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 NEPA 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.