**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION IX**
**75 Hawthorne Street**
**San Francisco, CA 94105-3901**

NOV 16 2009

Naval Facilities
Engineering Command Southwest,
Attn: Adrianne Saboya, JSF West EIS Project Manager
1220 Pacific Highway,
San Diego, California 92132-5190

Subject: Final Environmental Impact Statement (Final EIS) for the West Coast Basing of the MV-22 Tilt Rotor Aircraft (CEQ # 20090354)

Dear Ms. Saboya:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final EIS for the proposed basing of the MV-22 Osprey tilt-rotor aircraft in the Western United States 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 (Draft EIS) and provided comments on April 15, 2008. We rated the Draft EIS as Environmental Concerns-Insufficient Information (EC-2) due to concerns regarding air quality and noise impacts. EPA appreciates the added mitigation commitments regarding minimization of construction-related air quality impacts and appreciates the highlighted efforts underway to reduce energy usage and conserve resources.

EPA continues to recommend additional measures to reduce noise impacts, including reduced operations during the evening period and commitments for additional soundproofing for affected receptors. We also continue to recommend clarification regarding coordination with San Diego Air Pollution Control District (SDAPCD). As a general policy, we believe it is important to encourage a project proponent to work closely on general conformity analysis with the local air district. We agree with the statement provided in the response to comments that it is not a requirement to obtain a letter from the air district condoning or approving the determination that the project conforms to the SIP (vis-a-vis the SIP budgets). The intent behind EPA's comment requesting that the referenced, yet missing, SDAPCD letter be included in the Final EIS was to confirm that SDAPCD had reviewed the project proposal and compared it to work Department of the Navy had done in prior years with the District, in development of the applicable budgets. These budgets are key to the general conformity analysis and final determination. However, with Department of the Navy's decision to remove reference to the letter, it is unclear what coordination with SDAPCD has occurred. EPA has no reason to expect an exceedance of applicable emissions budgets; however, we suggest that Department of the Navy confirm, in the Record of Decision, what coordination has occurred with SDAPCD.

EPA appreciates the opportunity to review this Final EIS. When the Record of Decision is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Connell Dunning, the lead reviewer for this project, at 415-947-4161 or dunning.connell@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office

CC: San Diego Air Pollution Control District