



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUN 26 2009

Mr. George H. Markt, PG
NEPA Coordinator
U.S. Army Garrison
Bldg 667, Ruger Road
West Point, NY 10996

Dear Mr. Markt:

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Army Garrison (USAG) Environmental Assessment (EA) and the Draft Finding of No Significant Impact (FONSI) for the proposed construction of a Multi-Use Child Development Center on Buckner Loop on the grounds of United States Military Academy, West Point, New York. While EPA has no adverse comments specifically regarding the project, EPA would like to use this opportunity to encourage the USAG and the developer to implement green practices and techniques during the construction and operation of the project.

For example, air emissions during construction will include particulate matter (PM_{2.5} and PM₁₀). To reduce the potential health and environmental impacts of these pollutants in the project area and to improve the conditions for the workers, the installation of diesel particle filters (DPF) on construction equipment should be considered. DPFs can reduce diesel particle emissions by 90 percent for stationary and non-stationary diesel equipment. To learn more about this technology and its application, you may reference DPFs at <http://www.epa.gov/oms/retrofit/nonroad-list.htm> or contact us directly.

Materials such as plastic lumber, porous concrete, cinder gravel, modular blocks, and crushed granite are widely available and their use should be evaluated. In addition, since your project involves the construction of parking spaces, we encourage the use of rain gardens (also known as bioretention facilities). Rain gardens may be constructed in a parking island or linearly along a roadway with curb-cut inlets. These areas can be constructed along the edge of traditional parking spaces – the landscaped area is placed where the front or back of vehicles would overhang. Since this space is not used for wheel contact, valuable parking space is not sacrificed.

To meet electrical needs during construction and operation of the project, EPA recommends obtaining electricity from renewable sources. The Department of Energy's "Federal Energy Management Program" (FEMP) (information may be found at <http://www1.eere.energy.gov/femp/about/emff.html>) facilitates the Federal Government implementation of sound, cost-effective energy management and investment practices to enhance the project and nation's energy security and environmental stewardship by

providing help for energy efficiency and renewable energy projects. For more direct assistance you may contact Anne Crawley, (202) 586-1505 or anne.crawley@ee.doe.gov. As the FEMP Customer Representative for the Army, Ms. Crawley can provide technical expertise and answer your questions. In addition, "Green Power Network" (GPN) provides information and markets that can be used to supply alternative generated electricity. The following link identifies several suppliers of renewable energy:
http://apps3.eere.energy.gov/greenpower/buying/buying_power.shtml?state=NY

Finally, we ask that the USAG encourage the contractor to consider incorporating the ENERGY STAR program for new buildings. The program has successfully delivered energy and cost savings across the United States and in 2007 avoided greenhouse gas emissions equivalent to those from 27 million cars, while saving businesses, organizations, and consumers about \$16 billion.

EPA would like to thank you for the opportunity to comment on this project. If you have any questions regarding this review or our comments, please contact Charles Harewood of my staff at 212-637-3753.

Sincerely yours,



for Grace Musumeci, Chief
Environmental Review Section