



JUN 06 2011

Mr. Joseph R. Rhyner  
87 CES/CEAN  
2403 Vandenberg Avenue  
Joint Base McGuire-Dix-Lakehurst, NJ 08641

Dear Mr. Rhyner:

The Environmental Protection Agency (EPA) has reviewed the Department of the Air Force's April 2011 Draft Environmental Assessment, and Draft Finding of No Significant Impact and Finding of No Practical Alternative for the Environmental Assessment (EA) Addressing Proposed Airfield Safety Zone Vegetation clearing at Joint Base McGuire-Dix-Lakehurst, New Jersey (JBMDL). The proposed project would remove the vegetative obstructions within the airfield safety zones in the McGuire and Dix areas of JBMDL to meet required management measures developed in the United Facilities Criteria regulations. While the entire safety zone encompasses about 1,038 acres of land, approximately 175 acres will need to be maintained under this proposed action. Of the 175 acres needing maintenance, 135 acres are forested wetland and 15 acres are shrub/scrub wetlands. Clearing activities will be carried out with traditional logging methods. Tree stumps will not be removed, and no regrading of land will occur.

EPA's comments on the draft EA are as follows:

1) The document does not include an analysis of the possible indirect impacts of the project. The Council on Environmental Quality defines indirect effects as those effects which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. For example, the document should discuss whether the vegetation removal will increase the number of aircraft that will utilize the runways or increase the size of aircraft able to use the runways, and what affect that may have on the surrounding environment.

2) The cumulative impacts section of the document must include a discussion of other projects that have taken place on the JBMDL and its environs, and those projects that are reasonably foreseeable in the future. In February 2010, an EA addressing the "Hardening of Overruns for Runway 06/24" at JBMDL was

released. If this project has been constructed or will be constructed, it must be included in the cumulative impacts discussion for the present EA. EPA has also received a letter outlining the proposed JBMDL Flight Activity Facility to be located at the approach end of Runway 24. In addition, the System Evaluation Report included in this EA appears to state that there have been other tree removals on Fort Dix in the recent past. These projects and any others should be listed and analyzed before a determination of no significant cumulative impact is made.

3) As the site is located in the New Jersey Coastal Plain Sole Source Aquifer designated by the EPA as a Sole Source Aquifer on June 24, 1988 (citation 53 FR 23791), EPA has also reviewed the project in accordance with Section 1424(e) of the 1974 Safe Drinking Water Act, PL 93-523. Based on our review of the information provided, we do not anticipate that this project will result in significant adverse impacts to ground water quality. Accordingly, the project satisfies the requirements of Section 1424(e) of the Safe Drinking Water Act.

4) EPA acknowledges that the Department of the Air Force is willing to clear the forested area under seasonal restrictions. However, we recommend that the Department of the Air Force consult the New Jersey Department of Environmental Protection's Division of Wildlife and the U.S. Fish and Wildlife Service to determine the appropriate seasonal restrictions and include them in the Finding of No Significant Impact.

5) EPA understands that the purpose of the action is to increase the safety of aircraft landing or taking off from the JBMDL. However, it appears that cost may be a factor in determining the total amount of trees to be removed. Given that human activities (e.g., burning fossil fuels, deforestation, and urbanization) have changed the composition of the atmosphere and therefore are very likely influencing the earth's climate, the U.S. Government has established a climate policy. As such, and if cost was indeed a factor, we ask that you reconsider minimizing the number of trees to be removed while maintaining required safety levels in order to reduce the amount of carbon sink lost. Further, to offset the necessary loss of carbon sink, EPA suggests that the applicant re-plant native trees elsewhere to mitigate for the removal of approximately 135 acres of existing trees. We would also recommend that an invasive plant species control plan be implemented in the newly cleared area if one is not already included in the JBMDL's Vegetative Management Plan.

EPA would also like to use the opportunity to encourage you to implement green practices and techniques during the clearing of the safety zone. For example, air emissions during the clear cutting will include particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>). To reduce the potential health and environmental impacts of these pollutants in the project

area, the installation of diesel particulate filters (DPF) on trucks or construction equipment should be considered. DPF's can reduce diesel particulate emissions by 90 percent for stationary and non-stationary diesel equipment. To learn more about this technology and its application, you may reference DPF's at <http://www.epa.gov/cleandiesel/technologies/retrofits.htm> or contact us directly.

If you have any questions, please call Lingard Knutson of my staff at (212) 637-3747.

Sincerely,

A handwritten signature in cursive script that reads "Grace Musumeci". The signature is written in black ink and is positioned above the typed name.

Grace Musumeci, Chief  
Environmental Review Section