



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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OFFICE OF THE
REGIONAL ADMINISTRATOR

December 14, 2009

Robert L. Dogan, Program Manager
NGB/A7am, Conaway Hall
3500 Fetchet Avenue
Andrews AFB, Maryland 20762-5157

RE: Draft Environmental Impact Statement for Proposed Realignment of National Guard Avenue and Main Gate Construction at the Burlington International Airport, South Burlington, Vermont (CEQ # 20090360)

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 work to support the mission of the 158th Fighter Wing/Vermont Air National Guard at the Burlington International Airport in South Burlington, Vermont. The DEIS describes work necessary to reduce vulnerabilities to terrorist threats and increase security at the national guard installation through the incorporation of increased stand-off distances and improved access and entry controls. The proposed project would realign National Guard Avenue and provide a new Main Gate facility. We submit the following comments on the DEIS in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Primary impacts from the proposed project include impacts to 30 percent (0.64 acre) of an archaeological site and the addition of 3.2 acres (net) of new impervious surface from construction and demolition of the proposed facilities. The DEIS indicates that mitigation measures would be required to address the adverse effect to the archaeological site. We agree and encourage the NGB to describe the mitigation for this impact in the FEIS. With respect to the addition of impervious surfaces, the DEIS notes that best management practices as described in the Vermont Agency of Natural Resources Stormwater Pollution Prevention Plan (SWPPP) will be implemented during construction. The DEIS also notes that the NGB will file a Notice of Intent for coverage under the National Pollutant Discharge Elimination System (NPDES) for construction activities. EPA also recommends that the FEIS consider the use of Low Impact Development (LID) options for the project that can minimize the potential for indirect aquatic impacts to nearby waters of the United States. LID options include (but are not limited to) porous pavement, bio-retention, rain gardens, green roofs, bio-swales, and gravel wetlands for the buildings and paved surfaces. Use of these techniques is especially important in this case, as Section 438 of the Energy Independence and Security

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Act requires that all federal facility development and redevelopment projects larger than 5000 square feet maintain or restore the predevelopment hydrology of the property, to the extent technically feasible. EPA recently issued guidance to help federal agencies reduce stormwater pollution (and therefore be consistent with the Act) that can be found at www.epa.gov/owow/nps/lid/section438/.

We appreciate the opportunity to comment on the DEIS for the proposed work to support the Vermont Air National Guard's mission. Based on our review of the DEIS we have rated the DEIS "LO-1—Lack of Objections-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,



Elizabeth A. Higgins, Director
Office of Environmental Review

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.