June 12, 2014

Amy Kelley
Naval Facilities Engineering
Command Southwest
Attn: Code EV21.AK
1220 Pacific Highway, Building 1
San Diego, California 92132

Subject: Final Environmental Impact Statement (FEIS), U.S. Navy F-35C West Coast Homebasing, Imperial, Kings and Fresno Counties, California (CEQ # 20140149)

Dear Ms. Kelley:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document 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 (DEIS) and provided comments to the Navy on May 6, 2013. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) and expressed concerns regarding noise impacts at Naval Air Facility El Centro under the Preferred Alternative 2. We requested additional information regarding impacts to environmental justice populations, the Bird/Animal Aircraft Strike Hazard program, and how stormwater management would occur so as not to attract birds and wildlife to the airfield. We also recommended that renewable energy components be added to the project, consistent with Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management.

We appreciate the additional information in the FEIS in response to our comments. We continue to have concerns regarding noise impacts, especially to the additional 18 people at NAF El Centro who would be exposed to high noise levels (75-79 dB) under the Preferred Alternative. There is already a large population experiencing noise levels that are incompatible with residential land use (in the hundreds at El Centro, and over 1,300 at Lemoore). There are 3 individuals at Lemoore already experiencing noise levels greater than 80 dB. As the FEIS indicates (Appendix C), EPA determined that the average noise level standard needed to protect 96% of the population from greater than a 5 dB permanent threshold shift (hearing loss) is 70 dB Leq(24), and the National Academy of Sciences Committee on Hearing, Bioacoustics, and Biomechanics identified 75 dB as the lowest level at which hearing loss may occur. The FEIS states that the proposed project would not have significant noise impacts at NAF El Centro (p. 5-28). EPA believes that exposing residents to noise levels that could potentially result in hearing loss is a significant impact.

In response to our comments, the FEIS includes information describing the Navy’s noise complaint procedures and statements that they would continue to apply at Lemoore and El Centro. Because of the
high noise levels some residents would experience or continue to experience under the Preferred Alternative, we recommend that the Navy conduct targeted outreach to the public in Noise Zones 2 and 3 (areas > 65 dB) to ensure they are aware of the noise complaint procedure and appropriate contacts. This outreach could also include suggestions for soundproofing their homes. This should occur, at a minimum, for the 18 individuals who would newly experience > 75 dB noise under the Preferred Alternative.

We appreciate that the Navy will consider EPA’s recommendations regarding stormwater management and renewable energy during the preliminary and final engineering phases of the project. Thank you for the opportunity to review this FEIS. If you have any questions, please contact me at 415-972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

/s/

Kathleen Martyn Goforth, Manager
Environmental Review Section