April 9, 2021

Via Electronic Mail to NGB.A4.A4A.NEPA.COMMENTS.Org@us.af.mil
Attn: Ms. Christine Yott
3501 Fetchet Avenue
Joint Base Andrews, MD 20762-5157

Dear Ms. Yott:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the National Guard Bureau’s (NGB) construction, demolition, and renovation of the 118th Wing (118 WG) Air National Guard Base at the Berry Field, Nashville International Airport Draft Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI). This Draft EA and Draft FONSI consider a series of activities to modernize and optimize the 118 WG, including demolition of some structures, renovation of old structures, repairing buildings and roads, and construction of additional buildings.

Actions considered within the Draft EA include:

- **No Action Alternative.** Under the No Action Alternative, the NGB would not demolish, renovate, repair, or construct at the 118 WG. The Draft EA notes that this alternative would leave ineffective structures at the 118 WG that would interfere with their ability to execute their mission.

- **Alternative 1 – Proposed Action/Preferred Alternative.** In Alternative 1, the preferred alternative, the NGB would engage in a series of activities involving demolition, renovation, repair, and construction at the 118 WG. These activities include three (3) new construction projects, three (3) renovations and additions, four (4) demolitions, and one (1) upgrade and maintenance project. The NGB presents these activities in eight (8) separate projects in the Draft EA and Draft FONSI.

TDEC has reviewed the Draft EA and Draft FONSI and provides the following comments:

**Air Resources**

TDEC notes that the Tennessee Air Pollution Control Board has delegated regulation of most air pollution control responsibilities to the Metropolitan Nashville Davidson County.¹ TDEC asks that the NGB ensure this agency is contacted to provide input on the EA and FONSI, and that the projects described adhere to any local laws or regulations enforced by this local air agency. Specifically, TDEC requests that the NGB consult the local air

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¹ Division of Pollution Control, Metro Public Health Department. 2500 Charlotte Ave. Nashville, TN 37209-4129. Front Desk Phone: (615) 340-5653. Director: John Finke, (615) 340-0443. [https://www.nashville.gov/Health-Department/Environmental-Health/Air-Pollution-Control.aspx](https://www.nashville.gov/Health-Department/Environmental-Health/Air-Pollution-Control.aspx).
agency regarding building demolition and asbestos inspection and removal activities, construction of any potential air contaminant sources prior to starting construction of such sources, and open burning regulations and prohibitions as it relates to potential open burning of any vegetative or construction/demolition related debris generated from the project.

TDEC commends the use of the “5 minute” idling policy for construction vehicles as per the AF/A4 guidance.

Table 13 includes a row for maximum emissions near the bottom of the table. However, TDEC finds that the values for VOC and PM$_{10}$ are not the maximum emissions noted elsewhere in the table. TDEC encourages the NGB to reflect this consideration in the Final EA.

**Cultural and Natural Resources**

TDEC finds that, based on the information provided, no significant cultural resources will be affected by the proposed action. Previous archaeological assessments of the property found no significant archaeological resources. Any additional impacts will be mitigated through the State Historic Preservation Office consultation.

**Water Resources**

The Draft EA and Draft FONSI indicate that the construction and demolition activities described will disturb considerably more than one (1) acre of land and will require a Construction Stormwater General Permit with a Surface Water Pollution Prevention Plan, as noted in the submittal. The NGB’s proposed activities will avoid impacts to the two (2) tributaries of McCrory Creek and therefore will not need an Aquatic Resource Alteration Permit (ARAP).

TDEC appreciates the opportunity to comment on this Draft EA and Draft FONSI. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,

Jennifer Tribble, PhD
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cc: Kendra Abkowitz, PhD, TDEC, OPSP
    Daniel Brock, TDEC, DA
    Lacey Hardin, TDEC, APC
    Tom Moss, TDEC, DWR
    Matthew Taylor, TDEC, OPSP