

FACT SHEET

Military Basing, Training and the Clean Air Act

Legislative clarification is the only practical way to achieve the necessary balance between military needs and the goals of the Clean Air Act (CAA).

Background: The Department of Defense (DoD) regularly relocates forces among installations throughout the United States and the world in order to best position them for potential use and to optimize training opportunities. The Clean Air Act's "general conformity" requirement, applicable only to federal agencies, has threatened deployment of new weapons systems and the movement of forces among installations despite the relatively minor levels of emissions involved. Our military forces must routinely operate out of their home bases and transit to nearby training ranges to maintain readiness. Without a reasonable time period to meet Clean Air Act conformity requirements, the ability to operate in non-attainment regions is threatened.

- The planned movement of F-14s from Naval Air Station (NAS) Miramar to NAS Lemoore in California was only possible because of the fortuity that neighboring Castle Air Force Base in the same air-shed had closed, creating offsets. The same coincidence enabled the home basing of new F/A-18 at NAS Lemoore.
- The movement of F/A-18s from Cecil Field, Florida to NAS Oceana in Virginia was made possible only by chance, since Virginia was in the midst of revising its State Implementation Plan and was able to accommodate the new emissions. The Hampton Roads area in which Oceana is located will likely impose more stringent limits on ozone in the future, reducing the State's flexibility.

Discussion: The legislation would provide more flexibility under the Clean Air Act by allowing DoD and the State a three year period to accommodate or offset emissions from new military readiness activities in the State Implementation Plan.

- The provision is necessary to facilitate the relocation of forces critical to military transformation and the efficient use of forces.
- New weapons systems often use higher performance engines, causing them to emit more NO_x than the legacy systems they are replacing (they will also typically emit lower levels of VOCs and CO). Without greater flexibility, the conformity requirement could be a significant obstacle to the deployment of new weapons systems.
- The provision applies only to the new readiness activity, e.g. the new weapon system, not to any support activities or relocation-related construction (such as the construction of new housing or mess halls).
- The provision holds States harmless for emission increases that may violate air standards.

Impacts and Facts in Support: The new legislation would greatly facilitate the movement of military units among installations in order to best position them for potential use and to optimize training opportunities. The new emissions this proposal would *temporarily* authorize are typically less than 0.5% of the total emissions in air regions—several hundred tons in air sheds with emissions budgets of tens of thousands of tons.