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ENVIRONMENTAL IMPACT ANALYSIS PROCESS

FINAL
ENVIRONMENTAL IMPACT STATEMENT
FOR THE CLOSURE OF
PEASE AIR FORCE BASE
VOLUME II
MAY 1990

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**DEPARTMENT OF THE
AIR FORCE**

HEADQUARTERS, STRATEGIC AIR COMMAND
OFFUTT AIR FORCE BASE, NEBRASKA 68113-5001

93-16134





**Air Force
Environmental Planning Division
(HQ USAF/CEVP)**

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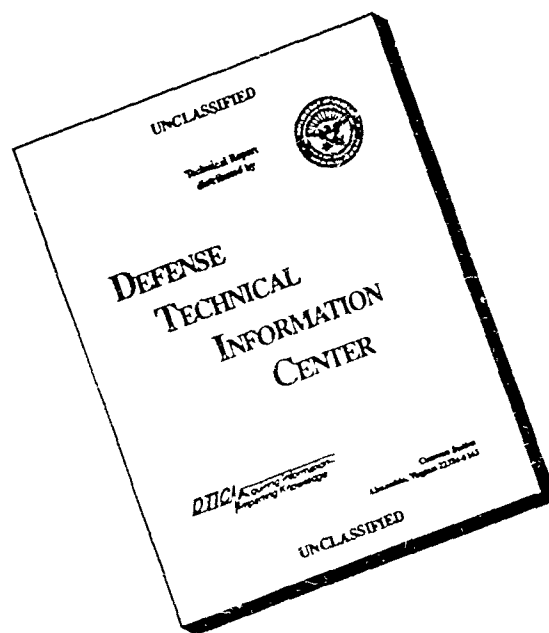
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ENVIRONMENTAL IMPACT STATEMENT
FOR THE CLOSURE OF PEASE AIR FORCE BASE

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APPENDIX I

DEIS PUBLIC COMMENTS/AIR FORCE RESPONSES

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INTRODUCTION TO APPENDIX I - DEIS PUBLIC COMMENTS/AIR FORCE RESPONSES

This appendix contains a reproduction of all written comments received from the public regarding the DEIS. Individual comments or groups of comments were identified in each letter and assigned a comment number. Opposite each numbered comment, an Air Force response with a corresponding number is presented.

Comments received at the public hearings are presented in Appendix J - DEIS Public Hearing Transcripts. A careful review of the transcripts showed that all of the comments from the hearings were presented in greater detail in the written comments. Therefore, to avoid duplication, the comments received at the hearings were not assigned a comment number and were not specifically responded to.

PO Box 3061
Portsmouth, NH 03802-3061
January 15, 1990

The Chairman
Council on Environmental Quality
722 Jackson Place NW
Washington, DC 20006

RE: ENVIRONMENTAL IMPACT ANALYSIS PROCESS Draft Environmental Impact
Statement for the Closure of Pease Air Force Base December 1989

Dear Sir:

Thank you for the opportunity to comment on the draft EIS. Unfortunately this draft EIS appears to have shortcomings throughout its entirety. I will cover, in a chapter by chapter analysis, the shortcomings and what appears to me to be a lack of data gathering, incompleteness of information gathered, publication of incorrect information, and what I feel is a document that was put together with an attitude to get it out on the street and if enough superfluous information is provided, no one will know what is being said or done.

I will start from the cover sheet, executive summary, and proceed through Chapters 1 to 4 with questions and comments concerning this draft EIS. I fully anticipate that these questions will be answered and be made a part of the final EIS.

COVER SHEET, Abstract:

As no definitive schedule was addressed at the 15 February 1989 and 28 March 1989 scoping meetings, will there be a scoping meeting for the second (reuse) EIS?

Will the public have an opportunity to provide inputs to the reuse draft EIS as may apply because of wording in 40 CFR, 1501.7(c)?
What is the schedule for the reuse EIS? If a schedule cannot be addressed, what is the earliest a schedule would be forthcoming?
Why would it not be safe to say that the reuse EIS could drag on for years?

Page S-1, paragraph one:

In the case of the 509th Bombardment Wing and 509th Air Refueling Squadron, does deactivation include the retirement of these two units colors or will these two unit designations be moved to another base and remain as active designations?

Page S-1, paragraph four:

Is the Environmental Assessment for the FB-111 programmed force structure change in draft or final form?

1 - A scoping meeting for the second EIS is being planned precisely because significant new information continues to arise regarding reuse. Work on the Pease AFB Reuse EIS is expected to begin this summer. An appropriate time limit will be set for its completion. As in this EIS process, a public scoping period will be held prior to starting the EIS and a public comment period will follow the publication of the DEIS. A draft schedule will probably be discussed at the scoping meeting. The length of this process will, in part, depend on the responsiveness of the participants.

2 - The two unit designations will remain active. The 509th Bombardment Wing designation will transfer to Whiteman AFB, Missouri, on 1 October 1990. The 509th Air Refueling Squadron designation will transfer to Griffiss AFB, New York, during the summer of 1990.

3 - The Environmental Assessment and Finding of No Significant Impact for the FB-111 programmed force structure change has been completed. Copies are available upon request from the Consolidated Assistance and Relocation Effort (CARE) office at Pease AFB.

Will a finding of no significant impact be forthcoming on this EA and when?

Page S-2, paragraph two:

What research data was used to arrive at an assumption the base deer population may increase to a level of conflict with the NHANG and transient aircraft? From what I can determine, the base deer population is 25 to 30 deer in past years, 7 to 8 deer have been taken during deer hunting season. In 1989, approximately 14 deer were taken. This, in a hunting area the base commander significantly reduced prior to the opening of the season. In a hard winter, at least 3 deer are lost to natural causes. If this holds true for the next 3 to 4 years, there will be no appreciable increase in the deer population. With base closure not scheduled until Jan 91, hunting on base should continue through calendar year 90. If this were the case, and increase in the deer population may not occur until 1993 or 1994. To address this issue in the closure EIS seems a bit premature and lacking definitive analysis.

What type activities will be scheduled to avoid adverse impacts on the nesting upland sandpiper areas? At what point in time after Jan 91 will this activity be stopped? Where on base do these upland sandpiper nest? Will these "activities" disturb these nests? What will be done to preclude disturbance?

The information in this paragraph is far from summarizing the major conclusions, area of controversy, and issues to be resolved as directed by 40 CFR, 1502.12.

Page S-2, paragraph three:

At what capacity (in percent) is the wastewater treatment plant presently operating at and what capacity will it be operating after Jan 91? If upon closure there is a reduction in treatment efficiency at the wastewater treatment plant, will NPDES-permitted outfalls be in violation of State regulatory requirements? If so, what actions will be taken?

Page S-2, paragraph four:

Will the Town of Newton or the City of Portsmouth be asked to provide base security after base closure? Which buildings on-base have been designated as historic buildings and are they listed on the national register of historic places? With the reuse of the base being looked at by a multitude of people, (town, city, state, commission, hired development firms, etc) who is to determine how the base is to be reused?

What supporting data is available that led to the conclusion that impacts on the employment and housing cannot be identified? What happens after closure to base fire fighting and rescue services? Will retirees have access to an AAFES store located in the NHANG cantonment area?

Does termination of access privileges for retirees mean a retiree will be denied entry to the base through the main and back gates after Jan 91?

4 - No research data were used in forecasting the possible increase in the deer population level. Many factors are involved in deer population dynamics. It is possible that the deer population may not increase to a level of conflict. The EIS presents the potential impact of most consequence.

5 - Page 3-25 of the DEIS described where upland sandpiper nest on base. Page 4-7 of the DEIS described the activities that will be scheduled to avoid adverse impacts to nesting sandpipers.

6 - We have reexamined this paragraph in light of your comments. The purpose of the summary is to succinctly state the action(s), expected impacts, and mitigation measures, if necessary. Readers who desire more information may refer to those specific sections within the document.

7 - The wastewater treatment plant is currently at 65 percent capacity. Future operating capacities are unknown at this time. Page 4-4 of the DEIS discussed this impact in detail and explained that measures will be taken to prevent any significant adverse impact to the Piscataqua River. The plan which will forecast potential wastewater quality changes and recommend operational adjustments is still under development. The plan will be completed before closure is implemented.

8 - Base security will be provided by the Air Force through the services of a contractor following closure. Historic buildings located on the base were discussed in Section 3.12, pages 3-26 and 3-27 of the DEIS. The Air Force will have the ultimate responsibility for transferring the base for reuse purposes. This action will be preceded by the reuse EIS which will consider all reasonable reuse alternatives. The summary text has been changed to more clearly indicate that the overall impacts on employment and housing cannot be determined until the reuse of the base has been identified. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS. Base fire-fighting and rescue service will be maintained by the NHANG following closure. A local cooperation agreement will have to be negotiated with the NHANG to ensure continued fire fighting and rescue services from the base. Retirees will have access to the Army Air Force Exchange Service (AAFES) store located in the NHANG cantonment area. Retirees will still be allowed access to the base to obtain services they are entitled to, such as access to the AAFES store. However, because of the closure, there will be only limited reasons for people to desire access. Nearly all facilities will be closed.

Page 1-6, item seven:

Section 1.3, paragraph three indicates that scoping comments are relevant to the disposition of the facilities and will therefore be addressed in not only this EIS but also in the future EIS. Item 7, the loss of medical and other facilities is identified but not adequately addressed. In light of its direct effect, why was this subject not adequately addressed when the lead paragraph indicates it will be addressed in not only this EIS but also in the future EIS? Closure of these facilities is a physical effect as is the departure of active duty military personnel and equipment. It should therefore be addressed in the closure EIS. Chapter 4 of this draft EIS does not discuss direct or indirect effects of the closure action and there significance as directed in 40 CFR, 1502.16(a) and (b).

Page 1-6, items 8 thru 16:

These items are not adequately addressed in this draft EIS for the reasons stated above. Why?

Page 2-2, list of units being deactivated:

What is the proper designation of the 509th Aircraft Maintenance Squadron? Is Detachment 7, 3904 Management Engineering Squadron; 541 Air Force Band; Tanker Task Force; KC-135 Simulator; and the Physiological Training unit going to be deactivated or moved to other bases? If moved, such as the 541 Air Force Band to Hanescom, AFB, what base will they be moved to? What is the disposition of the following units? The 1916 Communication Squadron; Detachment 4, 2 Aircraft Delivery Group; 3752 Field Training Squadron/Field Training Detachment 202; 3519 United States Air Force Recruiting Squadron; Detachment 6, 26 Weather Squadron; and the Air Force Commissary Service?

Page 2-2, paragraph three:

The draft EIS does not address the impact on remaining active duty personnel after the 509 Strategic Hospital is inactivated. How will this inactivation impact the remaining personnel?

The degree to which the base will be protected and maintained from 01 Apr 91 until disposition is not addressed in this draft EIS. Will it be addressed in this draft EIS? The second EIS will address the reuse and this is clearly a closure issue?

Page 2-3, paragraph one:

This draft EIS states that 1,500 military support personnel will be dispersed throughout SAC and other Air Force commands, with SAC as top priority and overseas commands as second priority. Is this statement in conflict with what is actually being done, overseas requirements being filled first for those assigned Code 36 and the SAC stateside requirements being filled second? Have overseas requirements already been filled with Pease personnel?

9 - The deactivation of the 509th Strategic Hospital was discussed in Section 2.2.1 of the DEIS. During the preparation of the DEIS, the Air Force considered whether there might be any indirect biophysical effects which could be attributed to socioeconomic impacts such as the effect of closing the hospital. No such effects or interrelationships were found. For this reason, it was not necessary for the completeness of this environmental analysis to forecast the socioeconomic consequences of base closure. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS. Both the direct and indirect socioeconomic effects of base closure along with the significance of these effects will be considered in the reuse analysis. The items identified are socioeconomic issues which will be considered in the reuse analysis. The concerns listed on pages 1-5 and 1-6 are those raised during the scoping process. Many times, concerns were not appropriate to the referenced EIS. In the case of the socioeconomic and related concerns raised by this question, the Air Force has stated that this type of analysis will occur when reuse plans have been developed and such an analysis will more truly reflect the positive and negative impacts of both the closure and reuse of Pease AFB.

10 - The proper designation of the 509th Aircraft Maintenance Squadron is the 509th Avionics Squadron. Clarification regarding deactivation or movement of the tenant units, as well as a complete listing of the tenant units, have been made in the text of the EIS in Section 2.2.1 on page 2-2.

11 - Following closure of the hospital on 30 November 1990, active duty personnel will be treated in the base clinic, which will be located in the hospital emergency room. Personnel requiring hospitalization will be treated at area hospitals. After the clinic is closed on 31 December 1990, any remaining active duty personnel will be treated at the Portsmouth Naval Shipyard clinic or at area hospitals as necessary.

12 - Section 2.2.1 on page 2-3 and Section 4.9 on pages 4-7 through 4-8 of the DEIS addressed these concerns. The Air Force intends to dispose of this property at fair market value. To protect this investment, the caretaker contract will be issued to maintain the base buildings and grounds.

13 - The statement reflected early policy. The text of the EIS has been changed in Section 2.2.1 on page 2-3 to reflect the current policy that overseas commands have the highest priority and will be manned first. All overseas assignments were expected to have been made by February 1990.

Page 2-3, paragraph two:

14 [What is the disposition of the static display aircraft in the airport and if these aircraft are moved over the road, how will this impact the community?

Page 2-3, paragraph four:

15 [In light of 40 CFR 1502.9, environmental impact statements shall be written in plain language. What facilities make up this physical plant referred to in the first sentence?

Page 2-4, paragraph two:

Was Building 145 built under the military construction program? If so, should not this building have been fully completed and in use thereby eliminating the need to expend large sums of money to alter and finish the interior?

The draft EIS states that Building 145 will be altered with interior partitions into a dining hall. What will be altered as it is presently void of an interior finish? Will the altering be more extensive than just altering with interior partitions?

Will major construction be undertaken of both the first and second floor's interior?

Will the funding for these construction activities in fiscal years 1990 and 1991 be funded out of the base closure account or out of congressionally appropriated funds?

16 Will aircraft ramp lighting for the alert parking area be upgraded or will it have to be newly installed?

Page 2-7, paragraph one:

Will the \$1.6 million come out of the base closure fund?

Page 2-7, paragraph two:

If the airport is accepted, will the Air Force remain responsible for and/or permanently close fuel lines and tanks excess to the needs of the NHANG?

Page 3-3, paragraph three:

This paragraph states that 16 tanks are fiberglass reinforced plastic and they are still in use storing mostly gasoline, diesel fuel, jet fuel, and waste jet fuel. As Pease does not have a treatment, storage, or disposal permit and is recognized by the State of New Hampshire as a hazardous waste generator with generator status, why is the base storing waste jet fuel? This product, as a waste, carries an EPA waste code of D001, ignitable, having a flash point of less than 140 degrees F.

17 Is this waste jet fuel stored on base for more than 90 days? If so, is the base in violation of regulations contained in Title 40, Code of Federal Regulations?

14 - The B-52, KC-97 and B-29 aircraft will be shipped by truck to Whiteman AFB, Missouri. The B-47 will be shipped by truck when and if it is claimed. All display aircraft will be dismantled before being shipped by truck on area roads. No impact to the community is foreseen.

15 - The physical plant involves the heat plant and all utilities such as water, electricity, and sewage treatment. This clarification has been added to the text in the FEIS in Section 2.2.2 on page 2-4.

16 - The first two questions of this group of comments are relevant to the military construction program and not to this EIS. Building 145 was originally constructed for different uses other than what it will be used for by the NHANG. During identification of support and operational requirements for the continued operation of the NHANG, Building 145 was identified as one of the buildings that needed modification. Both floors of Building 145 will be altered to accommodate the needs of the NHANG. The first floor will include a dining hall and a food preparation area. Premised office work stations will be placed on the second floor. Funding for this work comes from both the base closure account and the NHANG. The aircraft ramp lighting upgrade will include installing two additional light stands. The \$1.6 million for the fuel system work will come from the base closure account. As stated on page 2-7 of the DSI8, fuel lines and tanks excess to the needs of the NHANG will only be temporarily closed at this time.

17 - The terminology "waste jet fuel" applies to the primary use of the fuel. When such fuel was determined to be nonaircraft useable, other uses of the product were determined. Such uses included fire training exercises or sale as a recyclable petroleum product. The product is actually classified as a non-aircraft useable product; therefore, it is not covered by the 90-day hazardous waste disposal requirements. The aboveground tank located at the former fire training area was used to store this product. The tank is currently empty and is expected to remain empty until its removal. Therefore, there is no potential for this product to contaminate the Pease AFB drinking water supply.

If the waste jet fuel is disposed of within 90 days, are records available to ascertain that fact and how far back in years do these records show disposal? What is the location of the tank storing waste jet fuel and does the potential exist that this waste could contaminate the Pease AFB drinking water supply?

Page 3-3, paragraph four:

In regards to the two concrete tanks previously used to store waste trichloroethylene (TCE). If the TCE site at Building 113 is undergoing expedited remedial action, why has work not begun at the site other than removing the tank and drilling test wells? In this case what does the Air Force mean by expedited remedial action? When will this remedial action begin? Is it foreseen that the site of the tank which is to be removed, qualifies for expedited remedial action due to the nature of the hazardous waste contaminant stored in the tank? Was TCE leaked from the tanks at these two sites? If so, for how long and what effect has the leaked TCE had on the human environment?

18

Page 3-3, paragraph five:

If funding is not forthcoming, what is planned for underground storage tank projects? Will this hold up disposition of the land?

19

Page 3-3, paragraph six:

Does the earthen dike containment around each of the three large aboveground jet fuel storage tanks have the capacity to contain all spilled fuel from a full tank if it should rupture or begin to leak?

20

Page 3-4, paragraph one:

Because of the inadequate water pump and the settling of tank 2, will this tank be removed prior to land disposal? If not, what will be its disposition?

21

Page 3-4, paragraph three:

Have any recorded significant releases occurred at the bulk fuel storage area? What type of accidental fuel release clean up is employed for recorded significant releases and those releases considered environmental impact insignificant? Can a list of these recorded significant releases be found in Roy F. Weston's Installation/Restoration Program Phase II-Confirmation/Quantification Stage I or the Installation Restoration Program Records Search?

22

18 - It is not known what is meant in the comment by "work . . . other than removing the tank and drilling test wells." Expedited remedial action means priority or fast-track remedial action. Such action has been recommended by the Installation Restoration Program (IRP) consultant and will begin when EPA and State of New Hampshire concurrence has been obtained. The site was recommended for fast-tracked remedial action because of its potential threat to human health and/or the environment. TCE has leaked from the two tanks. TCE has been used at Pease AFB for a period of 10 to 15 years. It is not known when the TCE began leaking from the tanks. The effect the leaked TCE has had on the environment is still under determination. No water supply is known to be currently affected. It is important to note that IRP activities at Pease AFB would have occurred with or without closure of the base and will occur regardless of closure or reuse; therefore, they are considered to be a process separate from the closure and reuse EIS process.

19 - Funding is now available for tank removal and monitoring work. The additional necessary funding for the other tank work identified in Table 3.4.1-1 of the DEIS is expected to be forthcoming. The tank work may delay disposition of those specific parcels; at this time, it is too early to make a definitive statement.

20 - Yes, the capacity of the earthen dike containment is 110 percent of a full tank.

21 - As stated on page 4-1 of the DEIS, bulk fuel storage tank 2 and its associated piping will be drained prior to property disposal.

22 - Throughout its history, a number of significant releases have occurred in the bulk fuel storage area. In 1963, a ruptured drain line resulted in the loss of an undetermined amount of fuel from one of the tanks. One estimate was that up to 100,000 gallons spilled into the diked area surrounding the tank. Most of the released fuel was recovered. In 1975, an estimated loss of several thousand gallons of fuel occurred due to a corroded vent in the fuel transfer line. In 1980, an estimated loss of less than 1,000 gallons of fuel occurred before a small leak was detected and repaired. Pease AFB maintains a Spill Prevention, Control, and Countermeasures Plan. In the case of significant releases, appropriate Federal and State agencies are notified, and an emergency cleanup contract is employed. For insignificant releases, absorbent pads are utilized, which are then contained in 55-gallon drums and disposed of as hazardous waste. The Roy F. Weston reference you identified contains many discussions of accidental releases taken into consideration in the IRP.

Page 3-4, paragraph eight:

23 - If tank 2 is to be demolished, what does "the tank will be capped" mean?
Will the cost of tank 3 demolition be borne by the base closure account?
Has the tank already been demolished? If not, has the tank been cleaned?
Has the roof been supported with timbers to accommodate snow loading?

Page 3-5, paragraph one:

24 - You first sentence indicates that Appendix A contains a listing of the hazardous materials and their locations on base. This statement appears to be in error as Appendix A is nothing more than Annex C to the 509th Bomb Wing Operations Order 19-1, Oil, Fuel, and Hazardous Materials Spills Emergency Plan. Annex C is a list of materials on hand which are subject to accidental spillage. This list does not include hazardous material such as sealants, adhesives, paints, chemical warfare equipment, etc. Will a complete list of hazardous material and their location on base be made a part of this EIS? Has Annex C been updated since 1985? This plan is almost 5 years old and shows tank 3 in the bulk storage area as still subject to accidental spillage (tank 3 is to be demolished). Does the underground storage tank of P-D-680 at Building 227 still contain this product? If not, what is its disposition? Will the 1000 gallon tank used to store Soltrol 220 be added to Annex A? What other hazardous materials and their locations have not been identified?

Page 3-5, paragraph two:

25 - If the sludge created by base oil/water separators are also considered and treated as hazardous waste, does this include sludge/sand in the main oil/water separator located on the west side of the runway? If so, how often is this separator cleaned and are there records of the sludge/sand disposal? Does the quantity in Table 3.4.2-1 reflect both regulated and non-regulated hazardous waste or just regulated waste? Are the disposal manifest available for review?

Page 3-5, paragraph three:

26 - The first sentence does not identify "some hazardous wastes." Is this waste containerized or just piled on barren soil?
Have self-contained portable storage facilities been acquired? If not, does, "pending receipt of adequate funding" mean that these storage facilities are being budgeted in FY90 or will they be funded from the base closure account? Will they be in place prior to 01 Oct 90?
Are these hazardous wastes, acute hazardous waste, regulated hazardous waste or non-regulated waste?

Page 3-5, paragraph four:

27 - If the Defense Reutilization and Marketing Office (DRMO) (EIS incorrectly identifies DRMO as an organization) maintains all records and shipping manifest related to disposal activities, is the base in violation of EPA and State of New Hampshire regulations in that the generator must be in possession of these records?

23 - The statement that the tank will be capped was in error. The EIS text has been revised in Section 3.4.1 on page 3-4 to read that the underground piping will be capped (closed off). Demolition of the tank is currently being advertised. The demolition will not be funded from the base closure account. The tank has been cleaned. Based upon further review of the structural analysis of the tank, it has now been determined that support of the tank roof is no longer necessary.

24 - Appendix A is the best listing of hazardous materials currently available. Annex C has not been updated since 1985. Annex C is currently being updated, but will not be completed in time for this EIS. However, the removal of these materials will be done in accordance with Federal/State regulations. The underground storage tank at Building 227 no longer contains P-D-680. The material was disposed of in accordance with applicable regulations. There is an aboveground 1,000-gallon storage tank at Building 215 used to temporarily store a mixture of waste jet fuel and Soltrol 220. The mixture is pending disposal by contract.

25 - The sludge/sand in the main oil/water separator is currently considered and treated as hazardous waste. The separator is cleaned on an as-needed basis. Records of past cleaning and sludge/sand disposal do not exist. The quantities of hazardous waste that are presented in the table are regulated wastes. Disposal manifests are kept on file.

26 - The wastes are hazardous wastes, such as methyl ethyl ketone, and are containerized. This clarification has been added to the text of the EIS in Section 3.4.2 on page 3-5. It has been decided that self-contained, portable storage facilities will no longer be purchased because they would be used for only a short period of time.

27 - The DRMO provides the base copies of all records and shipping manifests related to disposal activities; therefore, the base is not in violation of the Federal or State laws. The disposition of these records upon disposal of the base is under determination. They will be readily available to governing entities and notification of their location will be made to the appropriate agencies. The records will be maintained for the required time period.

Because manifest and other records must be maintained for from 3 to 7 years and the DEMO servicing Pease is located at the Kittery shipyard in the state of Maine, where will these records be filed after base closure?
If the EPA, State of New Hampshire, City of Portsmouth, or the Town of Newington ever establish a need to review these documents, will they be readily available and where?

Page 3-5, paragraph five:

What effect has the application of pesticides and herbicides had on the human environment on Pease AFB?

Page 3-6, paragraph two:

28 This paragraph identified fungicides being mixed and rinsed from application machinery over a storm drain. Was the storm drain, in which the fungicides were discharged, connected to the base sanitary sewer system or a permitted outfall? If connected to a permitted outfall, what effect did these discharges have on the human environment?
Did the results of pesticide testing indicate any impact to the human environment?

Page 3-6, item 3.A.4:

29 How are radioactive waste such as aircrewmember watches, compasses, traveling wave tubes, magnetron and klystron tubes disposed of?

Page 3-6, paragraph three:

30 Paragraph three speaks of a health awareness letter being distributed base-wide regarding the prevention of ingestion of paint chips by children. As this distribution occurred nine years ago and the turnover in base housing was substantial during that period, what has been done in recent years to inform base housing residents of this situation?
Has the base housing maintenance contractor developed operating procedures and established a policy to deal promptly with chipped surfaces in base housing? Is it written into the base housing maintenance contract?

Page 3-7, paragraph one:

How are large household appliances from base housing, i.e. washers, dryers, trash compactors, refrigerators, console televisions, stereos, etc., etc., disposed of by the DEMO when these items are service members personnel property and by rights cannot be disposed of by DEMO?

31 It is stated that approximately 360 tons of solid waste is disposed of monthly and that this tonage does not include large household appliances and construction rubble. If household appliances and construction rubble is not included in the 360 tons, and approximately 332 tons of solid waste is disposed of by incineration, what makes up the 28 tons that is taken to state-approved landfills?

28 - Pesticides and herbicides are used to control unwanted pests and plant growth. When applied properly, they are not a threat to the human environment. No problems have been reported at Pease AFB that can be linked to the misuse of these chemicals. Occasional testing for pesticides in the base water supply wells has resulted in no detection of them. The storm drain in which fungicides were discharged is not connected to the base sanitary sewer system or a permitted outfall.

29 - A small collection of unserviceable watches and compasses are being stored in a controlled radioactive material storage area in the base supply warehouse. The Air Force Radioisotope Committee and the New Hampshire Radiological Health Division are currently determining the best method for disposal. The tubes mentioned are not radioactive wastes.

30 - Since the initial health awareness letter was issued, this information has been part of a handout given to all base housing occupants. Occupants have been instructed to inform the base housing office when paint begins to peel. The base housing maintenance contractor is then promptly ordered to scrape and paint the peeling surface.

31 - Large household appliances from the industrial part of the base are disposed of by the DEMO. A refuse contractor picks up and disposes of large household items that are service members' personal property. The 28 tons of solid waste that are taken to State-approved landfills are large bulk items such as wooden pallets, wooden crates, and carpets. The text stated that tree stumps and construction rubble are disposed of by ASPAKATA service contracts.

32 - Yes, these buildings included the nursery. Sixteen buildings are included in the several buildings discussed in the first sentence. There are no Federal requirements to maintain records on the disposal of asbestos. The quantity of asbestos that has been removed in the past 10 years was determined by examining scopes of work from past removal contracts and by adding those amounts to known amounts being removed by current contracts.

33 - The regulatory limit for extraction process toxicity is a federal limit, and is 1.0 parts per million (ppm). It is used in the classification of hazardous materials. As the sludge contained 0.1 ppm cadmium, it is classified as non-hazardous. State of New Hampshire regulations state that sludges with a total metal content of cadmium greater than 10 ppm may only be land applied under certain circumstances. Extraction process toxicity and total metal content are distinctly different types of tests which measure different attributes. The sludge in question had a total metal content for cadmium in excess of 10 ppm; therefore, it was mixed with grass clippings and leaves in an attempt to reduce the cadmium levels. Records of the past testing of one other sludge accumulation were found. The sludge met all requirements for land application. It is not of testing of any other sludge accumulations are no longer available. The records known if sludge used as loam material prior to 1987 contained high levels of metals. Heavy metals have not affected the base water supply to date. The mixing of sludge with grass clippings and leaves does not constitute a treatment action because the sludge does not qualify as hazardous waste. Cadmium was the only heavy metal test result of concern for the sludge retained on the drying beds. Other metals were nondetectable. The disposal of the sludge is planned for May 1990. Again, because the sludge does not qualify as hazardous waste, it is not required to be removed within 90 days.

34 - It was determined in the initial phase of the ITP (records search phase) that only inert materials were reportedly disposed of at the munitions site. The inert materials were actually inert residues from deactivation operations. There are no records going back to the 1960's. The deed for the transfer of the munitions site property will contain a covenant warranting that all remedial action necessary to protect human health and the environment with respect to any hazardous substance remaining on the property has been taken before the date of such transfer and that any additional remedial action found to be necessary after the date of such transfer will be conducted by the United States. A 3-month process for clearing the explosive ordnance disposal range is awaiting funding but is expected to begin in August 1990.

Paragraph one, sentence two indicates tree stumps and construction rubble are not included in the 360 tons and yet sentence four indicates that tree stumps and construction rubble are disposed of by service contract. This paragraph is very confusing and in my opinion could not be readily understood by the public.

Page 3-7, paragraph two:

Are we to understand that asbestos has been removed from all or parts of several buildings including the nursery, etc., etc? How many buildings are included in the several buildings mentioned in the first sentence?

Page 3-7, paragraph three:

As there are no regulatory requirements to maintain records on the disposal of asbestos, how are the figures stated in this paragraph arrived at?

Page 3-8, paragraph three:

If cadmium levels of the past two yearly accumulations of sludge are 0.1 parts per million, what is the state regulatory limit in parts per million? Was the last two yearly accumulations of sludge the only sludge that has been tested for heavy metals? If so, are records available? If sludge used as loam and fill material prior to 1987 contained high levels of metals, was the base water supply affected or will it be affected if this sludge is left in place?

Page 3-8, paragraph four:

Does the mixing with grass clippings and leaves in an attempt to reduce cadmium levels constitute a treatment action? Is Pease permitted as a treatment facility? What are the heavy metal test results on the sludge retained on the drying beds? If disposal action of accumulated sludge is being initiated, what is the date this action will be complete? Must it be done within 90 days?

Page 3-9, paragraph two:

Who and or from what source was it reported that only inert materials were reportedly disposed of at a munitions site? What inert materials were disposed of? Do records go back to the 1960s indicating what and where potentially explosive ordnance was buried or disposed of? Is the explosive ordnance disposal range going to be officially certified as cleared? If so, when?

Page 3-9, paragraph four:

Paragraph four states that four additional sites were added to the study. Were the four sites added to the study put through the Phase I records search and in this documented?

Page 3-9, paragraph five:

Were the seven new sites put through Phase I and Phase II evaluations? Which of the five sites recommended for expedited remedial action are in fact receiving expedited remedial action? Are these actions, full fledged clean-up operations? If not, what type of remedial action is taking place? Are documents showing the results of the investigation for 15 of the sites, to be made available in late 1989 or early 1990, for public view? If not, when will they be made available?

Is the Remedial Investigation/Feasibility Study still scheduled for completion in May 1991 and will any slippage of that date affect base closure or land disposal?

With Phase I, Problem Identification/Records Search being conducted in 1983 and the EPA proposed addition of Pease AFB to the National Priority List (NPL) in 1989, was no action taken during the intervening six years to clean up or eliminate the uncontrolled hazardous waste?

If TCE levels are all but eliminated, why is Pease recommended for addition to the NPL?

Because of the time period, 1983 to 1989, has the Air Force questioned the validity of the EPA's proposal to add Pease to the NPL? If not, why?

Page 3-10, paragraph one:

If drum removal is an interim remedial measure, what is the long term or permanent remedial measures?

Page 3-12, paragraph one:

What is meant by interim remedial measures identified include ground water extraction, treatment etc, etc?

Have jet engine test cell operations been curtailed to reduce contamination in and around Building 222 and in the drainage ditch east of the building?

Page 3-12, paragraph three:

Is Building 113 the Munitions Maintenance Squadron building or the Avionics Maintenance Squadron building?

What does contaminated plumes of TCE and vinyl chloride have been interpreted to occur in the vicinity mean? In what vicinity and where is the plume going?

In the area behind Building 119 still being used for drum storage and what is stored in the drums?

This paragraph is very hard to understand as it jumps between Building 113 and 119 and speaks of contaminants but does not tie the contaminants to a specific building.

35 - The answer is yes to your first two questions. Six of the seven new sites were from the subdivision of a single site and the other was discovered from aerial photograph reviews. Remedial actions have begun at all five sites. These are not "full fledged clean-up operations". These remedial actions include drum removals, soil removals, and installation of pilot ground water treatment plants. Pilot treatment plants may possibly become the final recommended cleanup action pending the evaluation of the plants after 1 year of operation. Finalized documents generated to date on IRP work have recently been made available to the public. These documents are located in the reading room in Building 43 at Pease AFB. As other IRP-related documents are completed and approved by the Federal and State regulatory agencies, they will be made available.

36 - The May 1991 date of the RI/FS report is no longer valid due to the need to transition the IRP into an EPA equivalent program. Delay of this document will not affect base closure. The impact of the delay on property disposal is unknown. Since 1983, action has been taken through continuation of the IRP to determine the extent of problems and the start of development of proposed cleanup actions. Action to list Pease AFB on the NPL was initiated by the EPA. The Air Force cannot speak for the EPA or its thought process. Pease AFB submitted a letter in disagreement with EPA's proposal to list the base on the NPL.

37 - Interim remedial measures are remedial actions which can be taken while further remedial investigations are being conducted and long-term remedial designs are being developed. Jet engine test cell operations have not been curtailed, but drainage from the building is now directed into two 3,000-gallon holding tanks. The fluid in the holding tanks is removed and processed through the wastewater treatment plant.

38 - Building 113 is the Avionics Maintenance Squadron building. This correction has been made in the PEIS in Section 3.4.8 on page 3-12. The extent or size of the plume has been estimated based upon current available data. The current ongoing interim remedial measures work will further define the plume's size and location. The general vicinity is between Buildings 113 and 119; however, the actual location and direction of movement of the plume have not been determined. The temporary drum storage area behind Building 119 is still used as an accumulation point to temporarily store drums of waste oil for less than 90 days in accordance with applicable regulations. The waste oil is held for recycling. The intent of the discussion is to describe an area of concern -- not to tie the contaminants to a specific building, area, or direction.

Page 3-12, paragraph four:

What is meant by interim remedial action will be performed in the portion of Newfield Ditch east of Dover Ave?

What will also be performed in conjunction with the excavation of an overflow pipe at Building 113? Does a waste TCE storage tank still remain next to Building 113 and is it still used? Was the TCE waste storage tank overflow pipe a part of the original tank or an after the fact pipe installation designed to drain the tank? Where does this overflow pipe drain to?

Does Building 244's TCE waste storage tank also have an overflow or drain pipe? Is it in use and where does this tank's overflow pipe drain to? Where are these overflow pipes in relation to the top/bottom of the storage tank? Were these pipes used for draining the tanks in lieu of removing the waste TCE for disposal?

Page 3-13, paragraph two:

If these measures are considered to be continued activities of the Air Force's IRP, how will these actions affect the disposal of buildings and lands around the jet engine test cell, jet engine maintenance building, avionics maintenance building, auto hobby shop, fire training area and other areas in terms of years down the road that these buildings can be sold by the Air Force?

Page 3-13, paragraph three:

The first sentence of this paragraph implies ground water pollution is continuing. Is ground water pollution occurring to the base drinking water?

Page 3-13, paragraph four:

Does the State of New Hampshire concur with the five processes being undertaken in this pilot program?

Page 3-13, paragraph five:

When will this one year pilot treatment operation begin at each of the three buildings mentioned? If the MPDES permit is secured to discharge the treated water into the sanitary sewer, how will this affect the operations of the waste treatment plant? Will this discharging of treated water further reduce loading of the wastewater treatment plant as mentioned in paragraph two, page 4-4?

Page 3-14, paragraph two:

Three of the five components of risk assessments were covered in this paragraph. What about the contamination assessment and the environmental fate and transport assessment?

39 - The questions pertain to page 3-13, paragraph one. This paragraph simply states that there will be an interim remedial action consisting of the excavation and disposal of contaminated soil at three locations which will involve over 1,000 tons of soil. Page 3-3 of the OGIS discussed the status of the waste TCE underground storage tanks. The Building 244 TCE tank is not in use and has not been used since 1965. Upon removal of this tank, it will be determined if it had an "overflow" pipe. The Building 113 TCE tank was found to have an "overflow" pipe at the top of the tank during its removal. The intended or actual use of this pipe is unknown.

40 - Disposition of these areas will depend on the exact nature of the reuse activities. The Air Force will not release any area or building whose subsequent use would create a health hazard for the occupants. Some areas and/or buildings may be retained by the Air Force until the regulatory approved cleanup is completed; access will be restricted to those personnel involved in cleanup and/or monitoring requirements. In some cases, some areas or buildings may never be released because of long-term monitoring. These will be identified as they become known. No suspected area or building will be released for reuse until it has been investigated for health hazards.

41 - Ground water pollution is not occurring to the base drinking water supply at this time. The main reason five IRP sites were recommended for expedited remedial action was to prevent such pollution from possibly occurring.

42 - The State of New Hampshire Department of Environmental Services has been involved with these five interim remedial measures from the onset.

43 - The current schedule shows these pilot treatment plants becoming operational in the November-December 1990 time period. If it is decided to discharge the treated water into the sanitary sewer, the effect on wastewater quality at the wastewater treatment plant will be determined and appropriately addressed. Because of the low volumes (estimated 18,000 gallons/day as compared to the wastewater treatment design capacity of 1.2 million gallons/day), the one-year discharges from the pilot treatment plants are not expected to significantly affect wastewater treatment plant operations.

44 - The contamination assessment will identify and, to the extent possible, quantify the contaminants present at a site. The environmental fate and transport assessment will describe the potential for offsite migration, provide estimates of the direction of movement, and include information of factors that may significantly affect the fate and transport of contaminants released from a site. The Air Force will follow the established EPA guidelines concerning the risk assessments.

Page 3-14, paragraph three:

45 [This is a very unenlightening paragraph as it leaves the reader wondering what is being said. What is the purpose of this paragraph?

Page 3-14, paragraph five:

46 [Will survey results, translated into plain language be made a part of the reuse RIS?

Page 3-15, paragraph two:

47 [If these results cannot be directly correlated to health standards, why is this mass of superfluous data made a part of the RIS? Table 3.5-1 shows a record of meaningless figures that are not related to anything indicating whether they are good, bad, or indifferent.
What is the relationship of 1,174 tons of carbon monoxide emitted annually to the human environment or something that is relevant?
Is this table added to the RIS just to take up space or does it have some meaning to someone other than the general public?

Page 3-15, paragraph four:

48 [With only one permanently installed boiler left in the central heat plant, how will the human environment be affected if this boiler were to break down or be taken off-line for maintenance?
How many years has this remaining boiler been in operation and what is the expected life of this boiler?
Has this boiler developed any problems since going on line as the only boiler providing heat and hot water to the buildings it services?

Page 3-15, paragraph five:

49 [Have all operations that could be considered a source of contamination to the base aquifer been curtailed? Is there a list of base operations that could be considered a source of contamination?

Page 3-16, paragraph one:

50 [Last sentence. Is that the demand of the three wells combined?

Page 3-17, paragraph one:

51 [Where was the source of TCE contamination in the base overburden aquifers? If the source has not been identified, what is to prevent TCE from recurring?

45 - This paragraph simply states that any wetland impacts to be caused by IRP activities in the Landfill 5 area will be specifically coordinated with the State of New Hampshire. As the text goes on to say on page 3-14 of the DEIS, specific wetland assessments will be conducted.

46 - The survey will be an IRP activity, a process separate from the reuse RIS.

47 - The air quality data are presented in accordance with Air Force guidelines used nationwide. The relationship of the carbon monoxide emissions to the environment is the reduction in those emissions. The reduction is considered insignificant because carbon monoxide is in attainment status in the Portsmouth area. The information is useful to EPA and State governments as it indicates levels of pollution.

48 - The remaining boiler has not developed any problems since returning to operation as a primary boiler. There should be no human environment problems because an emergency backup boiler has been installed. The age and remaining life of the boiler does not warrant RIS analysis.

49 - The Air Force's Hazardous Waste Management Program has resulted in the practical cessation of all nonessential base operations that could be considered a source of contamination to the base aquifer. Essential operations which need to be continued are ones such as deicing of aircraft with isopropyl alcohol and deicing the flightline with urea. Since 1986, there has been no water quality problem in the base water supply. There is no list of base operations that could be considered a source of contamination.

50 - Demand currently runs approximately one-third of the combined capacity of the three-well system. However, more precisely, demand currently runs two-thirds of the combined capacity of the two wells being used at this time.

51 - The suspected source of the TCE contamination was the underground waste TCE storage tank area next to Building 113. IRP activities have and will continue to prevent TCE contamination from recurring.

Page 3-17, paragraph two:

52 [Is chlorination and fluorination being accomplished in the water treatment plant? What is meant by the statement, "it was improperly designed for a constant flow and pressure of water?"]

Page 3-17, paragraph three:

53 [How does the sentence, "The standard is based on aesthetic values" relate to the rest of the paragraph?
What are the levels of other metals such as cadmium, mercury, etc? What is being done to lower the concentration levels that have exceeded EPA standards?]

Page 3-17, paragraph four:

Besides Flagstone and McIntyre Brooks, which other brooks have weirs?

Page 3-20, paragraph two:

54 [Are high flows during heavy rains routed through an oil/water separator? If not, where do these high flows go?]

Page 3-21, paragraph one:

Are all six oil/water separators at industrial facilities operational? Are their effluents tested and are records maintained on the results of the test? At what industrial facilities are these oil/water separators located?
On which ponds is motorboating allowed? What type of motorboating is allowed and is there a limit on motor horsepower?

Page 3-22, paragraph four:

Is the burning of firewood done in most housing on base?

Page 3-22, paragraph five:

55 [If freshwater wetlands are significant, why are they not illustrated in this EIS?
Should the sentence read, "The mudflats off the northern portion of the base....?" How many oysters per year are harvested from these oyster beds? How many base residents shell fish for clams and oysters?]

52 - The chlorination and fluorination water treatment processes are being accomplished. The carbon portion of the TCE water treatment process was designed to operate at a constant flow and pressure of water. The water supply to the carbon portion is of variable flow and pressure.

53 - The sentence refers to the iron quality standard. The levels of other metals are either nondetectable or do not exceed any standards. Nothing is being done to lower the iron and arsenic levels because they occur naturally in the area.

54 - No other brooks have weirs. High flows are bypassed into the receiving streams. All six oil/water separators are operational. They are located at Buildings 213, 222, 227, 229, 249, and on the southwest side of the runway. Effluent from the separators are not tested. The base NPDDES permit only requires testing at the locations shown in figure 3-2 of the DEIS. Motor boating is only allowed on Base Pond at a 5 mile per hour (no wake) limit. There is no limit on motor horsepower.

55 - Fewer than 20 of the base housing units have a fireplace. A figure presenting the location of wetlands on base was not included in the DEIS because closure activities will not cause the destruction of any wetlands. The sentence discussing the location of the mudflats is not in error. The answers to the questions about shell fishing are not readily known.

Page 3-23, paragraph two:

56 [Of the 2,000 acres of utilized fish and wildlife managed land, how many acres are open to hunting?
Where can statistics be found on the number of people who use acreage on base for hiking, bird watching, and nature studies?

Page 3-23, paragraph six:

57 [Is the dam separating Upper and Lower Peverly Ponds still in need of structural repair? Is this repair on an open workorder?

Page 3-24, paragraph one:

58 [If the current deer population size is 12 to 15 deer and approximately 14 deer were taken on base in the '89 deer season, that does not leave many deer on base. If these figures are correct, how could the writer of the executive summary come to the conclusion that the base deer population may increase to a level of conflict with airport operations. With this years deer kill and the writers deer population figures, we're down to very few deer on base.
Are deer managed on base any differently than they are in any other part of New Hampshire?

Page 3-24, paragraph two:

59 [Why has no mention or comments been made about wild turkeys on base?

Page 3-24, paragraph four:

60 [Are planned improvements to be continued? If not, how will this impact the environment?

Page 3-25, paragraph four:

[Were street trees planted in the base housing areas? What percent of the base was planted with new street trees?

Page 3-25, paragraph six:

61 [What is the definition of a Pease AFB designated trail? Other than the X-country ski trail that is rarely if ever used, where on base are there any other designated trails?
Are the gated, limited access roads used by other than those cutting firewood?

56 - Approximately 2,000 acres are open to hunting. The number of people who use acreage on base for hiking, bird watching, and nature study has not been studied.

57 - The dam is still in need of structural repair. The repair is not on an open work order.

58 - Refer to response 4. Deer can immigrate onto the base if habitat becomes unoccupied and available. A comparative analysis of deer management on Pease AFB to any other part of New Hampshire is not within the scope of the EIS process.

59 - The DEIS concentrated on species addressed in the Pease AFB Conservation and Management Plan for Fish and Wildlife Resources.

60 - The DEIS concentrated on the most important planned improvement, which was to inventory all abandoned fields and develop a 10-year mowing schedule. Page 4-5, paragraph one, and page 4-6, paragraph one, discuss the impact on the environment.

61 - Street trees are not planted in the base housing area. Less than 1 percent of the base was planted with new street trees. A designated trail is not that is marked. In addition to the cross-country ski trail, there are snowmobile and trailbike trails located in the Peverly Pond area. The limited access roads used by those cutting firewood are also used for hiking and walking. All of the 16 miles of designated trails are used for skiing, snowmobiling, trailbiking, riding, hiking, and walking. Recreational trail use is determined by observation. Page 4-5, paragraph two, and page 4-11, paragraph four, discuss the adverse effects on the human environment and forest management.

What are the 16 miles of designated trails used for and how do you determine that they are being used for recreation?
Will the non-use of these roads and trails have an adverse effect on the human environment and forest management?

Page 3-28, paragraph one:

At any time during the preparation of this EIS by the US Army Corps of Engineers, was it ever determined that the operation of Pease AFB had an effect on the communities surrounding Pease? Without a doubt it can be said that the operation of an Air Force Base has an effect on the local community through purchases of goods and services. Then why are the economic and social environmental effects and the natural or physical environmental effects such as employment, both full and part time by civilian and military personnel, housing, education, and recreation not considered to be interrelated? Who in the Air Force determined that no direct or indirect biophysical effects could be attributed to socioeconomic impacts? In plain English, what does indirect biophysical effects mean as defined by the EPA? What supporting data was used to determine that it was not necessary for the completeness of the environmental analysis to forecast socioeconomic consequences?

62

Page 3-28, item 3.13:

Four out of the six paragraphs in this section deal with the Office of Economic Assistance and I feel that violates the intent of this chapter in that 40 CFR 1502.15 states that agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues. How can the communities in two separate parts of the country be found to be so similar that this section in both the Chanute AFB draft EIS and Pease AFB draft EIS are exactly the same? Why are these two identically worded socioeconomic comments found in two different chapters of these two base's draft EIS. In the Chanute AFB draft EIS the socioeconomic statement is found in Chapter 4, Environmental Consequences and in the Pease draft EIS it is found in Chapter 3, Affected Environment? Which is this exact duplication of words, a statement of environmental consequence or an indication of the affected environment?

63

Page 3-32, paragraph two:

Does the statement could be directly impacted mean that educational services provided by Portsmouth may not be affected by the closure?
Is this transitional reuse by Newington/Portsmouth being seriously considered by the Air Force and will it require yet another EIS?

64

Page 3-32, paragraph four:

Does this mean that even with the WHANG's 10 KC-135 Stratotankers and no reduction in its flying commitment, fire fighting and rescue operations on the base are going to be reduced to the point where community assistance is eliminated?

65

62 - In Section 3.13, page 3-28, the DEIS acknowledged there would be socioeconomic effects due to closing the base. These were not considered because there were no interrelated biophysical effects identified which were likely to result in significant impacts. HHSNF is responsible for EIS contents and decisions. A biophysical effect is one impacting the biological and physical environment. Socioeconomic impacts must be considered in an EIS only if they indirectly result in biophysical impacts. Based on this definition, likely socioeconomic effects were reviewed and no interrelationships were identified.

63 - The Office of Economic Adjustment (OEA) is an important agency which provides assistance in mitigating socioeconomic impacts when bases are closed. Whether the base is in New Hampshire, Illinois, or California, the procedures and types of assistance available from OEA are the same, hence the wording is the same. The monies and grants may, however, be different; this is a decision made by OEA independent of any input by the Air Force. The information provided in the EIS's because this is a Federal agency that can beneficially impact these areas. You are correct, however, in that the information should have been placed in Chapter 4; it has been corrected in this document (Section 4.11, page 4-9).

64 - The complete statement indicates that impacts to the schools are dependent on interim use or reuse plans. This wording has been changed to reflect the dependence of impacts on successful implementation of reuse plans. Section 4.12.1, page 4-9, of the DEIS indicated base closure will result in closing and mothballing both Bracket and Jones elementary schools on base. Since the public comment period on that draft, the Air Force has been notified that the school district may choose to continue operations at Jones elementary school. If this is the case, then the fence line which separates the base from the surrounding area will be located so that open access to Jones school would be possible, while still permitting base security. Section 4.12.1, page 4-11, of the DEIS reflects the changed status of Jones school.

65 - Refer to response 8. Base fire-fighting and rescue operations will be adequate to support the WHANG's mission. The WHANG will renegotiate the current community assistance support agreement to accurately reflect the types of assistance it will be able to continue to offer the community.

Page 3-33, paragraph one:

With 14,300 military and Coast Guard retirees, this figure does not include non-retired veterans eligible to receive services, active duty Army, Navy, Air Force, and Marine Corps personnel eligible to receive services, and NHANG personnel eligible to receive services, why has this \$15 not adequately addressed the impact of lost entitled services? As an example: Service-wide, the Army-Air Force Exchange Service will lose \$5.6 million annually in earnings because of base closures and the majority of the \$83 million in annual lost sales will come from retirees, a loss that will never be made up. What will be the lost annual sales at AAFES run activities on Pease and what will be the loss in annual earnings? Will AAFES realize a return on its investment from the sale of the relatively new AAFES Exchange building? If not, what justifies closing it if other base exchanges are going to have to be increased in size at the expense of AAFES because of the movement of active duty personnel?

66

Page 3-34, Table 3.16.1-1:

Why were FY87 figures used? Are FY88 figures available? Are FY88 figures not appealing enough to be presented? What do the winter sports consist of? To me, these figures are highly suspect? Where exactly were they derived?

67

Page 3-47, paragraph six:

Why does Figure 1-3 show the alignment of the railroad spur track extending to the intersection of Rochester Ave and Portsmouth Ave? Where does the track presently end? Is it a viable alternative to send items by rail in light of the tracks condition?

68

Page 3-48, paragraph two:

Why is railroad indicated as an alternative way of shipping equipment, etc, if the tracks do not penetrate further than the woods near the bulk fuel storage area?

Page 4-1, paragraph five:

Will all underground storage tanks and associated piping systems be eventually removed by the Air Force? If not, why will those not removed, not be removed by the Air Force?

69

Page 4-2, paragraph one:

Where do most releases occur? Are these releases confined to fuel or are hazardous waste releases included? Do hazardous waste releases reach exposed soil if spilled?

70

66 - Section 3.16, page 3-33, of the DEIS only considered retired military personnel in the area. It is apparent that other persons who are eligible to use the base would also be excluded because of closure. For the most part, these are members of the military service and their families and members of the NHANG stationed in the area. These persons would have the same alternative facilities as retired military personnel, such as traveling to other bases or purchasing goods and services locally in the private sector at an additional cost. This is not an unusual condition for persons stationed in areas without a major military base and base exchange, hospital, and other facilities. Potential financial losses to the AAFES due to closure of Pease AFB are economic impacts. As discussed previously, these types of socioeconomic impacts are not being considered as part of this EIS. Also refer to responses 9 and 102a.

67 - Recreation activity figures from FY 1987 were used because they are the most recent data available. These figures were provided by the Base Civil Engineering Office. Winter sports include ice skating and cross-country skiing.

68 - The alignment of the railroad spur track shown on Figure 1-3, page 1-5, presents an alignment before part of the tracks were removed. Figure 2-2, page 2-6, has been modified in the EIS to show the end of the existing trackage. As discussed in Section 4.17, page 4-18, of the DEIS, the use of rail for transport would require costly renovations of the spur track. This is not considered a viable alternative at this time.

69 - The Air Force does not plan to remove all of the underground tanks and associated piping systems. The tanks and piping systems not to be used by the NHANG will be rendered temporarily out of service pending reuse decisions.

70 - Page 3-4, paragraph three, of the DEIS addressed these concerns.

Page 4-2, paragraph two:

71 [Is the NHANG permitted by the State to handle hazardous waste? Does the NHANG have a treatment, storage, and disposal permit or are they a permitted generator? If not, will they attempt to secure either permit?

Page 4-2, paragraph four:

72 [Will the base refuse transfer station remain in operation to support NHANG waste disposal? If not, when will the transfer station close?
Will the reuse EIS identify this significant beneficial impact concerning the reduction of solid waste as only a temporary beneficial impact?

Page 4-5, Paragraph five:

73 [Will all PCB contaminated transformers be removed from the base prior to Jan 91? If not, when will they? What were the reasons for the Air Force not addressing polychlorinated biphenyls in this EIS?

Page 4-7, paragraph seven:

74 [If the answer to my last question of Page 2, (see page S-2, paragraph four) is yes, how will military retirees, NHANG and Portsmouth Naval Shipyard personnel gain access to these trails that even now, no one uses?

Page 4-8, paragraph four:

75 [Will a prehistoric and historic archeological resources assessment be done of the base? If yes, when?

Page 4-8, paragraph five:

76 [What facts support the assumption that it is anticipated that there will be a transition during closure activities and occupancy by the new owner? What basis does the Air Force have for assuming this transition period should minimize potential loss of jobs. Will this transition period require preparation of yet another EIS?

77 [What data is used to support the statement that this area is experiencing rapid economic growth? Is the writer speaking of past growth or present growth? The effect on employment, as difficult as it might be and as negative as it might be, should be determined in this EIS. Why is the Air Force reluctant to address this issue when reuse may be years down the road along with the reuse EIS?

71 - The NHANG is not currently permitted by the State to handle hazardous waste. The NHANG plans to only temporarily store hazardous waste for periods less than 90 days. The NHANG does not have a treatment, storage, and disposal permit and does not plan to secure such a permit. The NHANG will apply for EPA generator identification.

72 - The reuse EIS will address these concerns. The NHANG does not anticipate a need for use of the base refuse transfer station.

73 - All PCB-contaminated transformers with 50 parts per million or greater PCB have been taken out of service and will be disposed of in accordance with applicable regulations prior to January 1991. PCB's were not singled out in a discussion in the DEIS but were included in the listing in Appendix A.

74 - The statement that use of the trails should continue by retired military, NHANG, and Portsmouth Naval Shipyard personnel was in error. Use of the trails will not be allowed upon closure. This statement has been corrected in the DEIS in Section 4.9 on page 4-8.

75 - Page 3-27, paragraph three, of the DEIS addressed these concerns.

76 - When closing a base, the Air Force, as the owner of the property being responsible for its maintenance and security, examines potential scenarios relating to that base's buildings and property. Several scenarios have been examined including: transitional (or temporary) use which can occur during phase out of Air Force operations; temporary use after withdrawal of the active duty forces; and a time period where there is no utilization (or in the case of Pease AFB, use by NHANG) by anyone. In this case, the base is placed in protection and maintenance status. One of the ways that security and maintenance is provided is through (Air Force) contractor personnel. These positions will not significantly affect the overall reduction in employment. Section 4.11.1, page 4-10, has been rewritten, and the reference to the transitional employment beyond that required for protection and maintenance of the base has been deleted. If a redevelopment committee presents reuse plan(s) to the Air Force and the necessary environmental analysis is completed, there is the possibility that a base may never go into maintenance and protection status.

77 - As presented in Section 3.13.2, page 3-29 of the DEIS, the economic impact area had experienced rapid growth and high levels of employment as recently as 1988. Since that time, there has been a downturn in the area economy. Unemployment in the three-county area has increased and the housing market has become depressed in recent months. The recent economic condition is discussed in Section 3.13.2, page 3-31, of the DEIS. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS. Conducting a socioeconomic analysis as part of the reuse EIS allows the Air Force to consider the overall effects of closure and reuse as part of the reuse decision making process. It would also be less speculative than if it were partially conducted in the closure EIS.

Page 4-9, paragraph one:

How does the Air Force know base reuse will offset or mitigate the negative effects of base closure to some extent? That is a presumption that cannot be substantiated.

For the general public benefit, what are offsetting impacts of base reuse? A complete analysis of the impacts of base closure to local governments should be addressed in the closure EIS.

The NEPA does not have categories of EISs. An EIS is an EIS and whether an issue has a positive or negative impact on the action, it should be addressed. It appears from this EIS that the Air Force is attempting to stay clear of negative impacts and especially in this closure EIS.

78

Page 4-9, paragraph two:

The closure of Brackett and Jones school may not be a significant impact on the on-base community but it sure will be to the local community in lost jobs and to the federal government to the tune of \$5.1 million of federal 'hold harmless' money the City of Portsmouth will receive between 1990-92? If \$5.1 million is not a significant impact to the federal government than I don't know what is. If 60 teachers and 30 other school employees will lose their jobs because of the base closure and it is looked upon as not being a significant impact, please indicate in the EIS, what is?

79

Page 4-9, paragraph four:

If ever there was a paragraph that was unmistakable in its ability to demonstrate the art of tap dancing, this paragraph must be rated number one.

80

Page 4-10, paragraph one:

Another paragraph and table of superfluous data that has weight and takes up space.

Page 4-10, paragraph two:

Where are the environmental consequences in this paragraph? It appears that this significant negative impact is too hot to handle?

81

Page 4-11, paragraph two:

Very descriptive paragraph. Where's the impact of closure?

78 - It is reasonable to assume that the base will be reused. The principle unknown is to what extent it will be reused. Any reuse development creating employment and economic activity will generate local revenue, thereby partially reducing or mitigating adverse effects to local governments. Therefore, the statement regarding the mitigation or offsetting of adverse impacts is valid. Actually, NEPA does provide different categories of EIS's (i.e., legislative EIS); however, the proponent agency (in this case, the Air Force) is required to discuss socioeconomic impacts if they are interrelated to natural and biophysical effects of the action. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

79 - Please see response 78 and Section 4.11, page 4-9, which discusses the interrelationship between biophysical and socioeconomic impacts in an EIS. Since the publication of the DEIS, the school district has discussed with the Air Force the possibility of continued operations at Jones Elementary School. The comment writer assumes that there will be no reuse of Pease AFB, which might result in the impact described. At this time, it is reasonable to assume that the base will be reused. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

80 - Your comments are noted.

81 - A change in the area housing market due to the closure of Pease AFB would be a socioeconomic impact. As stated previously, the Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9.

Page 4-11, paragraph four:

82 [Why has active duty personnel remaining in the Seacoast area not been considered and the impacts addressed that will result from loss of outdoor/indoor recreation and other services?]

Page 4-18, paragraph two:

83 [When is construction to begin on the Spaulding Turnpike overpass of Gosling Road?]

This concludes my comment on the base closure environmental impact statement. I wish to thank you for your indulgence and eagerly await your decision on responses to these comments as per 40 CFR 1503.4.

Sincerely,


Peter P. Brenciano

82 - Refer to response 66.

83 - According to the New Hampshire Department of Transportation, construction could start on the Spaulding Turnpike overpass on Gosling Road as soon as the 1991 construction season.

14 Sumac Drive, PA2B
Portsmouth, NH 03801
16 January 1990

84 - Economic impacts to mobile home owners caused by the closure of Pease AFB are not interrelated with any natural or physical environmental effects. Therefore, it was not necessary for the completeness of the environmental analysis to discuss these impacts. The Congressional delegation has introduced bills that would allow the Air Force to reimburse the owners in the amount of their unpaid first and second mortgages. The Air Force will support the bills.

TO WHOM IT MAY CONCERN

I am a voting taxpayer serving his country in the United States Air Force. I have been in the Air Force for ten years, I have served in Germany and spent a year isolated from my family in Iceland. All this time I saved what I could out of what little pay I was earning. All this time I wanted to own my own home or piece of real estate.

Finally, on December 8th, 1988, I was able to purchase a mobile home within the Pease Air Force Base mobile home park. The Base Housing Office encouraged us to purchase our home as it was an alternative to affordable housing in the area. The Air Force also allowed the sale and the Base Commander granted us usage of the mobile home lot space.

On December 29th, 1988, Base Closure was announced. Once Base Closure was announced no one would purchase any mobile homes in the park, as it is a "Closed Market", military personnel can only sell to military and with everyone facing base closure and reassignment no one will buy.

There are 50 families living within the mobile home park; each now face financial ruin due to Base Closure.

The Air Force has tentatively given us until 31 March 1991 to remove our homes from the lots at Pease AFB, or being military members we face action being taken against us for not complying with removal of our homes. Or they may remove them themselves.

The financial institutions that hold the mortgage on our mobile homes have told us that we are not to remove our home unless it is refinanced. No financial institution will refinance our home now that we face Base Closure and losing our lot space. A vacant mobile home lot space cannot be found within a 30 mile radius of the base. This eliminates any possibility of moving my home, having it refinanced, and retaining its \$30,000 value locally.

The Air Force on the other hand expects me to remove my mobile home by 31 March 1991. Presumably to take it with us wherever we go. I paid \$30,000 for my home in 1988, and it was appraised at \$30,500 in 1989. The real estate market in the local area is unique. Mobile homes are the only alternative to affordable housing.

My home is a 1974, two bedroom, mobile home. Due to its age, if I am to move it for example to Cannon AFB, Clovis, New Mexico it will face structural damage over the 2,000 mile move. It will also depreciate in value to approximately \$3,000. Yet I will have to get it refinanced and face taking a \$27,000 loss!

I do not have an opportunity to sell my home to personnel that live off-base either. I am in a closed-market, I can only sell to other military personnel. This puts me at a total disadvantage.

The town of Lexington has zoned the mobile home park for mobile home use after base closure. But presently there is a conflict as to who will have final zoning authority (local or state). This would allow us to sell our home to another person. But it is unknown how long we would have to wait for an answer on this question. In the meantime I am faced with reassignment in the near future.

In the mid 1960s Congress passed legislation that was supposed to help people in my situation. The Housing Assistance Program does not include mobile homes though as they are "mobile". It does not provide for any unique circumstances as of mine and the 50 families stationed at Pease.

On top of this, the Army Corps of Engineers has surveyed the local economy and concluded that base closure will have a significant impact on the local economy and real estate. They have authorized affected personnel to use the EAP Program. This will provide them with an alternative. This in itself seems to be totally unfair.

Due to Base Closure, myself and 50 other families must somehow now learn to adjust and be able to survive with our mortgage payments. On the amount of money the government pays me monthly there is no possible way I can afford to take a loss of this nature and pay my mortgage. I have four dependents that I must provide food and shelter for. I now face defaulting on my loan with the bank, ruining my credit, and losing whatever equity I have built up.

I believe that this is an injustice. Someone must help us. Not only do I have alot at stake but these financial institutions have alot also. There must be a compromise available that the government, bank, and myself can reach. I would greatly appreciate any assistance you can provide and look forward to your response.

Sincerely,

David J. Gutkowski
DAVID J. GUTKOWSKI, TSgt, USAF

Home Phone (603)436-2291
Duty Phone (603)430-3224

willan response

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

85 - Refer to response 84.

Name: Michael W. Halland
Address: 12 Sweet Dr. Pease AFB Newington
Mobile Home Park

Check the category to which you belong:
Landowner ☐ Business Person ☐ Other ☒

Check the participant category to which you belong:
Public ☐ Designated Representative ☐ Private Citizen ☒
Official ☐ Of Private Organization ☐

Check here if you wish to ask a question during the hearing. ☒

Check here if you wish to offer oral comments. ☐

Check here if you wish to submit a written statement. ☐

Check here if you wish to receive an EIS. ☒ draft
☒ final

Area of question or comment (please check all that apply):
Air Quality ☐ Public Services & Facilities ☐
Water Quality ☐ Health Hazards ☐
Biological Impacts ☐ Visual Impacts ☐
Geology/Soils ☐ Cultural Resources ☐
Land Use ☒ Other (Specify) Mobile Home Park

Please turn in this sheet as requested by the hearing officer.
Written comments will be considered in preparation of the final EIS. You may use this sheet to submit written comments either in the space provided below, on the back, or in an attached statement. Written comments may also be submitted in a letter or other format, but regardless of format, comments must be submitted no later than 13 February 1990.
Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: 1) The mobile home park needs to be on the EIS. 2) Is the Air Force going to take care of the 50 families who live in the mobile home park? or are they going to move with the Air Force? 3) Should the Air Force pay for the mobile home park?

Statement(s) Attached ☐ Yes ☒ No

*Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

06 - Refer to response 84.

Name: DAN DAMATO
Address: 31 SUMAC DR.
PEASE AFB NH 03801 (603) 436 9995

Check the category to which you belong:
Landowner _____ Business Person _____ Other * Trailer Park

Check the participant category to which you belong:
Public _____ Designated Representative _____ Private Citizen ☒
Official _____ Of Private Organization _____

Check here if you wish to ask a question during the hearing. _____

Check here if you wish to offer oral comments. _____

Check here if you wish to submit a written statement. _____

Check here if you wish to receive an EIS. ☒ draft ☒ final

Area of question or comment (please check all that apply):
Air Quality _____ Public Services & Facilities _____
Water Quality _____ Health Hazards _____
Biological Impacts _____ Visual Impacts _____
Geology/Soils _____ Cultural Resources _____
Land Use _____ Other (Specify) Trailer Park

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Please mail your comments to :
Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: To military & civilian members of the Pease Air Force Base community, I am the chairman of the Pease Air Force Base Citizens Advisory Committee. I am pleased to hear that you are interested in the Pease Air Force Base and its future. I am sure that you will find the information provided in this sheet to be helpful. Please call me at your convenience.

Statement(s) Attached Yes _____ No _____

Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

COMMENT SHEET
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

Name: MICHAEL C. MCKINNON

Address: 20 SUMAC DRIVE

PEASE AFB, NEWINGTON, NH.

Check the category to which you belong:
Landowner _____ Business Person _____ Other TRAILER PARK OCCUPANT

Check the participant category to which you belong:
Public _____ Designated Representative _____ Private Citizen
Official _____ Of Private Organization _____

Check here if you wish to ask a question during the hearing. ✓

Check here if you wish to offer oral comments. _____

Check here if you wish to submit a written statement. _____

Check here if you wish to receive an EIS. ✓ draft final

Area of question or comment (please check all that apply):
Air Quality _____ Public Services & Facilities _____
Water Quality _____ Health Hazards _____
Biological Impacts _____ Visual Impacts _____
Geology/Soils _____ Cultural Resources _____
Land Use _____ Other (Specify) TRAILER PARK ON BASE

Please turn in this sheet as requested by the hearing officer.

Written comments will be considered in preparation of the final EIS. You may use this sheet to submit written comments either in the space provided below, on the back, or in an attached statement. Written comments may also be submitted in a letter or other format, but regardless of format, comments must be submitted no later than 13 February 1990.

Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: COULD YOU ADDRESS THE TRAILER PARK
ISSUE ON PEASE AFB. MANY OCCUPANTS CAN NOT GET OR
MAINTAIN THEIR TRAILERS AND HAVE CONSIDERED THE ARMY
CONC OF ENGINEERS SINCE SOON APPROVED FEDERAL ASSISTANCE FOR
THESE HOMEOWNERS OFF BASE. WE WHO CAN GET TO GENERAL
PUBLIC BUT WANT ASSIST. MOBILE HOME OWNERS ON BASE,
WHO CAN GET TO ANOTHER MAN, STAY TO CASE THEIR
SITUATION, INQUIRY, MYSELF, WE NEED CONGRESSIONAL ACTION
(OVER)

Statement(s) Attached _____ Yes _____ No _____

*Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

TO GET ASSISTANCE. ~~WANT~~ 5 FAMILIES HAVE ALREADY
RECEIVED ORDERS AND LEFT THEIR TRAILERS BEHIND.
WE NEED HELP FAST, CAN ANYONE HELP US,
WE NEED TO GET APPROVED TO LEAVE TRAILERS
WHERE THERE AT IF IT IS TO BE A TRAILER
PARK.

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

88 - Refer to response 84.

written response

Name: Pease A Beige
Address: 26 Sumac Dr
Pease AFB NH 03801

Check the category to which you belong:
Landowner _____ Business Person _____ Race Resident
Other ✓

Check the participant category to which you belong:
Public Designated Representative _____ Private Citizen ✓
Official _____ Of Private Organization _____

Check here if you wish to ask a question during the hearing. _____

Check here if you wish to offer oral comments. ✓

Check here if you wish to submit a written statement. ✓

Check here if you wish to receive an EIS. ✓ draft final

Area of question or comment (please check all that apply):
Air Quality _____ Public Services & Facilities ✓
Water Quality _____ Health Hazards _____
Biological Impacts _____ Visual Impacts _____
Geology/Soils _____ Cultural Resources _____
Land Use ✓ Other (Specify) _____

Please turn in this sheet as requested by the hearing officer.
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Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: I would like to see the Govt have an Amendment to the HAP Program to help save the Environmental Assets at the Pease Air Force Base. The closing of Pease has forced the value of my trailer to drop rapidly. I would be forced to find the Bankruptcy and don't feel to Govt is helping to take care of it own people.

Statement(s) Attached Yes X No

*Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

written Response

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

89 - Refer to response 84.

Name: Rene Hadland
Address: 12 Sumac Dr Pease AFB NH

Check the category to which you belong:
Landowner _____ Business Person _____ Other _____

Check the participant category to which you belong:
Public _____ Designated Representative _____ Private _____
Official _____ Of Private Organization _____ Citizen ☒

Check here if you wish to ask a question during the hearing. _____

Check here if you wish to offer oral comments. ☒ _____

Check here if you wish to submit a written statement. _____

Check here if you wish to receive an EIS. ☒ draft ☒ final

Area of question or comment (please check all that apply):
Air Quality _____ Public Services & Facilities _____
Water Quality _____ Health Hazards _____
Biological Impacts _____ Visual Impacts _____
Geology/Soils _____ Cultural Resources _____
Land Use ☒ Other (Specify) _____

Please turn in this sheet as requested by the hearing officer.
Written comments will be considered in preparation of the final
EIS. You may use this sheet to submit written comments either in
the space provided below, on the back, or in an attached
statement. Written comments may also be submitted in a letter or
other format, but regardless of format, comments must be submitted
no later than 13 February 1990.
Please mail your comments to : Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: The issue of the Traker Park on Pease must
be addressed in this statement not the RIFSA statement. This
issue affects 50 families and the town of Newington. Please
take a good hard look at this issue.

(Pease Handout) Statement(s) Attached ☒ Yes ☐ No

*Filling out this form is not required, but it is recommended.
The hearing officer will call first on those who have completed
and turned in comment sheets before recognizing persons who have
not. Thank you for your cooperation.

NOTE - This excerpt was included with the comment from Rene Hadland.

The Future of Pease Newington's Plan

Excerpted from the
Future Land Use Chapter
of the Town of Newington's

Master Plan

Adopted April 1988
Revised September 1989

NH Air National Guard

In summary, it is anticipated that the Air National Guard's licensed cantonment area will increase from 17 acres to 250 acres, an increase of 203 acres. Title to the land will continue to be held by the United States Air Force.

The Guard's current 13 buildings cover 189,120 square feet. The anticipated cantonment area would encompass a total of 29 buildings, representing an increase in the 157th's building area of 169,766 square feet, or 90%. This expansion would provide the Guard with a total building area of 358,886 square feet.

The proposed Air Force District does not include the Control Tower (Building #232), the Crash Fire Station (Building #241), or the aircraft parking aprons, as these facilities fall within the bounds of the Airport District. The proposed Air Force District would include most of the Guard's anticipated 250 acre cantonment area plus an additional 84 acres to the east, an area which is the site of several large landfills and fuel spills.

The Air Force District would encompass 64 of the 81 acres of waste sites in the vicinity of the North Ramp that have been identified by the *Weston study*. Were these waste sites to fall within Newington's jurisdiction, they could pose potential liability problems for the Town, as well as for the future owners of the property. The economic value of these waste sites is virtually nil, thus they can be expected to generate very little tax revenue.

Pease Mobile Home Park

Newington officials have long recognized the desirability of providing housing opportunities for people of all income levels. Not only is the social fabric of a community greatly enriched by a heterogeneous mix of population, it is plainly evident that the economy of the entire region would be severely undermined should we experience a labor shortage brought on by a housing shortage. Redevelopment plans for Pease which promote commercial or industrial uses must also include realistic provisions for housing the proposed work force. Any reuse plan which ignores the basic needs of labor is doomed to failure.

Pease's mobile home park lies on the Newington side of the base. The park's fifty dwellings cover 18 acres, for an overall residential density of 2.8 units per acre. Because the park's roads and utilities are already in place, there is virtually no need for additional public improvements. Thus, when the Air Force departs, this park could potentially be one of the least expensive residential neighborhoods in the seacoast region.

Pease Mobile Home Park

Just as Newington has historically taken a leadership role by laying the groundwork for the development of many well paying industrial jobs which benefit the entire region, town officials intend to set an example in addressing the region's housing crisis.

Newington rejects proposals to demolish housing situated within the town's municipal boundaries, as these structures represent a valuable resource and an essential component of a healthy economic base. In order to insure the preservation of this housing stock, the Planning Board recommends that the mobile home park be preserved. To accomplish this, as well as to provide for future expansion, the park, along with eight additional acres that are situated immediately adjacent to and east of the park, should be designated as a *Mobile Home District*, a zone in which mobile homes would be the only permitted use.

The additional eighteen acres cited above would allow for an additional fifty mobile homes. These one hundred mobile homes (50 existing plus 50 future units) represent a 39% increase in Newington's total 1989 housing stock of 258 units.



Looking west down
Sumac Drive
(Pease Mobile Home Park)

Newington has dedicated the mobile home park to affordable housing, a use which qualifies as public interest under federal law. Therefore, the Air Force is obliged to sell this part of Pease for an amount that is considerably less than market rate, presumably to a buyer who would guarantee the park's long-term affordability. The cost to the town for the vacant land, and the cost of the existing fifty units should be minimal. Newington's housing strategy, and its rationale, is described in detail in the *Housing* chapter of this Master Plan.

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

90 - Refer to response 84.

Name: Robert G. Schaefer
Address: 3 Seneca Drive Pease AFB, NH 03801

Check the category to which you belong:
Landowner _____ Business Person _____ Other Mobile Home
Port Resident

Check the participant category to which you belong:
Public _____ Designated Representative _____ Private
Official _____ Of Private Organization _____ Citizen

Check here if you wish to ask a question during the hearing. ☒

Check here if you wish to offer oral comments. _____

Check here if you wish to submit a written statement. _____

Check here if you wish to receive an EIS. _____ draft
_____ final

Area of question or comment (please check all that apply):
Air Quality _____ Public Services & Facilities _____
Water Quality _____ Health Hazards _____
Biological Impacts _____ Visual Impacts _____
Geology/Soils _____ Cultural Resources _____
Land Use _____ Other (Specify) _____

Please turn in this sheet as requested by the hearing officer.
Written comments will be considered in preparation of the final EIS. You may use this sheet to submit written comments either in the space provided below, on the back, or in an attached statement. Written comments may also be submitted in a letter or other format, but regardless of format, comments must be submitted no later than 13 February 1990.
Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: I feel that the Air Force should
make every effort to allow the town of
Newington to purchase the existing mobile home park
on Pease and the adjacent 18 acres as outlined in
the book we use Chapter of the town of Newington
Master Plan. This would greatly lessen the town's
financial and reduce the tremendous financial burden
causing the 50 families who live there

Statement(s) Attached Yes _____ No _____

*Filling out this form is not required, but it is recommended.
The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

written response

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

Name: BRENDA M. BLONIGEN
Address: 30 SOMAC DR
PEASE AFB NH 03821

Check the category to which you belong:
Landowner _____ Business Person _____ Other X mobile home park
Check the participant category to which you belong:
Public _____ Designated Representative _____ Private Citizen X
Official _____ Of Private Organization _____

Check here if you wish to ask a question during the hearing. X
Check here if you wish to offer oral comments. _____
Check here if you wish to submit a written statement. _____
Check here if you wish to receive an EIS. X draft _____ final _____

Area of question or comment (please check all that apply):
Air Quality _____ Public Services & Facilities _____
Water Quality _____ Health Hazards _____
Biological Impacts _____ Visual Impacts _____
Geology/Soils _____ Cultural Resources _____
Land Use _____ Other (Specify) Mobile Home Park

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Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: When are we going to have the hearing?
I don't think it has even been addressed

Statement(s) Attached Yes _____ No _____
*Filling out this form is not required, but it is recommended.
The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

written response

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

92 - Refer to response 84.

Name: Alan Cuyler
Address: 49 Sumner Dr.

Pease AFB NE 03801 Pease Resident

Check the category to which you belong:
Landowner _____ Business Person _____ Other ☒

Check the participant category to which you belong:
Public _____ Designated Representative _____ Private ☒
Official _____ Of Private Organization _____ Citizen ☒

Check here if you wish to ask a question during the hearing. ☒

Check here if you wish to offer oral comments. ☒

Check here if you wish to submit a written statement. _____

Check here if you wish to receive an EIS. ☒ draft ☒ final

Area of question or comment (please check all that apply):

Air Quality _____ Public Services & Facilities ☒
Water Quality _____ Health Hazards _____
Biological Impacts _____ Visual Impacts _____
Geology/Soils _____ Cultural Resources _____
Land Use ☒ Other (Specify) _____

Please turn in this sheet as requested by the hearing officer.

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Please mail your comments to: Dr. Hugh Stirts

HQ SAC/DEV

Offutt AFB, NE 68113-5001

COMMENTS: I THINK THAT THE MOBILE HOME PARK SHOULD
BE KEPT IN THE AREA OPERATING AS IS.
MANY PEOPLE HAVE SPENT A LOT OF MONEY AND
TIME INVESTED.

Statement(s) Attached _____ Yes _____ No _____

*Filling out this form is not required, but it is recommended.
The hearing officer will call first on those who have completed
and turned in comment sheets before recognizing persons who have
not. Thank you for your cooperation.

written response

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

93 - Refer to response 84.

Name: THRESDA M. JONES
Address: 161 Nauthorne Dr
PEASE AFB NH 03801

Check the category to which you belong:
Landowner _____ Business Person _____ other ☒ Public Hearing

Check the participant category to which you belong:
Public _____ Designated Representative _____ Private ☒
Official _____ Of Private Organization _____ Citizen ☒

Check here if you wish to ask a question during the hearing. ☒

Check here if you wish to offer oral comments. ☒

Check here if you wish to submit a written statement. _____

Check here if you wish to receive an EIS. ☒ draft ☒ final

Area of question or comment (please check all that apply):
Air Quality _____ Public Services & Facilities _____
Water Quality _____ Health Hazards _____
Biological Impacts _____ Visual Impacts _____
Geology/Soils _____ Cultural Resources _____
Land Use _____ Other (Specify) PAFB M&M Homelessness

Please turn in this sheet as requested by the hearing officer.
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Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: I feel that the government's impact on the closure of the Pease Air Force Base is a major impact on the community and on the people who live there. I am a resident of the Pease Air Force Base and I am a member of the Pease Air Force Base Community Association. I am a member of the Pease Air Force Base Community Association and I am a member of the Pease Air Force Base Community Association.

Statement(s) Attached _____ Yes ☒ No

*Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

written response

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

94 - Refer to response 84.

Name: JOE JONES
Address: 22 SUMMIT DR
PEASE AFB NH 03501

Check the category to which you belong:
Landowner ☐ Business Person ☐ Other ☒

Check the participant category to which you belong:
Public ☐ Designated Representative ☐ Private Citizen ☒
Official ☐ Of Private Organization ☐

Check here if you wish to ask a question during the hearing. ☒

Check here if you wish to offer oral comments. ☒

Check here if you wish to submit a written statement. ☐

Check here if you wish to receive an EIS. ☒ draft ☒ final

Area of question or comment (please check all that apply):
Air Quality ☐ Public Services & Facilities ☐
Water Quality ☐ Health Hazards ☐
Biological Impacts ☐ Visual Impacts ☐
Geology/Soils ☐ Cultural Resources ☐
Land Use ☐ Other (Specify) MOBILE HOME PARK

Please turn in this sheet as requested by the hearing officer.

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Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: LEAVING THE MOBILE PARK AS IS WILL IMPROVE THE
TO HAVE AT LEAST 50 AFFORDABLE HOUSING UNITS IN AN AREA WHICH
IS NOT OF AFFORDABLE HOUSING. ALSO WITH SHARPE MORE FIRST TIME
BUYER AND PERSONS ON WITNESS TO AFFORD THEIR OWNERSHIP.

Statement(s) Attached ☐ Yes ☒ No

*Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

written response

COMMENT SHEET #
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

Name: JEAN M HARRY
Address: LITTLEBROOK AIRPARK (OWNER)
ELIOT, MAINE 03903

Check the category to which you belong:
Landowner X Business person X Other Private
Check the participant category to which you belong:
Designated Representative Private
Official Citizen
Check here if you wish to ask a question during the hearing. X
Check here if you wish to offer oral comments. X
Check here if you wish to submit a written statement. ---
Check here if you wish to receive an EIS. --- draft
--- final

Area of question or comment (Please check all that apply):
Air Quality --- Public Services & Facilities ---
Water Quality --- Health Hazards ---
Biological Impacts --- Visual Impacts ---
Geology/Soils --- Cultural Resources ---
Land Use --- Other (Specify) THE SPACE IN THE
SOUTHEAST CORNER OF THE NEW WING OF THE
REAR AREA

Please turn in this sheet as requested by the hearing officer.
Written comments will be considered in preparation of the final
EIS. You may use this sheet to submit written comments either in
the space provided below, on the back, or in an attached
statement. Written comments may also be submitted in a letter or
other format, but regardless of format, comments must be submitted
no later than 13 February 1990.
Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: IT HAS BEEN STATED WHEN THE AIR FORCE LEAVES
THE AIRPORT, THE RADAR FACILITY WILL BE CLOSED AND
THE TRAFFIC WILL THEN BE HANDLED BY OTHER MEANS
OR BY OWN APPROACH. THIS IS UNUSUAL AS
NEITHER ONE OF THESE FACILITIES CAN HANDLE THE
CURRENT AIR TRAFFIC AND ANOTHER AIRPORT
WILL OCCUR AS A RESULT OF THE
AIR FORCE REMOVING THE RADAR EQUIPMENT.
NO
STATEMENT(S) ATTACHED YES
Also, my airport will lose an important approach.
Filling out this form is not required, but it is recommended.
The hearing officer will call first on those who have completed
and turned in comment sheets before recognizing persons who have
not. Thank you for your cooperation.

95 Many comments were received on the DEIS regarding the loss of the radar
approach control (RAPCON) facility at Pease AFB and its effect on air safety.
Prior to completion of the DEIS, the Air Force consulted with the Federal
Aviation Administration (FAA) regarding potential air safety impacts due to the
closure of this facility. It was determined that the circumstances in the area
justified the continued provision of radar approach and air traffic control at
Pease AFB. Discussions of this determination and of the continued operation of
the RAPCON facility are contained in Section 4.17.1, page 4-20 of the FEIS.

COMMENT SHEET
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

Name: G. Bradley Richards

Address: 214 South Road
Rye Beach, N.H. 03871

Check the category to which you belong:
Landowner ☒ Business Person ☐ Other ☐

Check the participant category to which you belong:
Public ☐ Designated Representative ☐ Private ☒
Official ☐ Of Private Organization ☐ Citizen ☒

Check here if you wish to ask a question during the hearing. ☒

Check here if you wish to offer oral comments. ☒

Check here if you wish to submit a written statement. ☐

Check here if you wish to receive an EIS. ☐ draft ☒ final

Area of question or comment (please check all that apply):

Air Quality ☐ Public Services & Facilities ☒
Water Quality ☐ Health Hazards ☒
Biological Impacts ☐ Visual Impacts ☐
Geology/Soils ☐ Cultural Resources ☐
Land Use ☒ Other (Specify) ☐

Please turn in this sheet as requested by the hearing officer.

Written comments will be considered in preparation of the final EIS. You may use this sheet to submit written comments either in the space provided below, on the back, or in an attached statement. Written comments may also be submitted in a letter or other format, but regardless of format, comments must be submitted no later than 13 February 1990.

Please mail your comments to: Dr. Hugh Stirts

HQ SMC/DEV

Offutt AFB, NE 68113-5001

COMMENTS: Schedule a Clean-up event, and
have with that subject the to department present??
What we have been discussing it
day for contract use of landfills etc

Statement(s) Attached Yes ☐ No ☐

*Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

96 - Some hazardous waste sites are still undergoing evaluation to determine the extent of the wastes and the most appropriate action(s) to clean up these areas (remedial action). All remedial actions and tiratahles must be agreed upon by the Air Force, EPA Region 1, and the State of New Hampshire. At this time, an inter-agency agreement is being discussed between the Air Force, EPA, and the State specifically to cover investigations and remedial actions at Pease AFB. It is important to note that the IIR discussed in Section 3.4.8, pages 3-8 through 3-14, is an independent program, separate from base closure activities. All cleanup activities, as agreed upon by the organizations noted above, will be accomplished, regardless of the status of Pease. Pease will be evaluated for cleanup monies with other Air Force bases as if it were still an active base. Landfills will be one of the issues discussed with the regulatory agencies mentioned above. It is important to note that landfills are not appropriate for structures of appreciable size. For example, closed landfills are most suitable for recreational areas; i.e., parks, golf courses, and so forth. Any development over a closed landfill that would disturb or remove the cap (cover material) poses many problems, both engineering and environmental. Because of Federal and State restrictions, it is possible that some pieces of land may never be released. If this occurs, those areas will be restricted from public access.

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

97 - Refer to response 84.

Name: Suzanne S DiAmato
Address: 31 Sumac Dr.
PAFEB, NH 03801 Mobile Home

Check the category to which you belong: Business Person Other Mobile Home
Landowner Public Private

Check the participant category to which you belong: Public Private
Official Designated Representative Citizen
Of Private Organization

Check here if you wish to ask a question during the hearing.

Check here if you wish to offer oral comments.

Check here if you wish to submit a written statement.
Check here if you wish to receive an EIS. draft final

Area of question or comment (please check all that apply):

Air Quality Public Services & Facilities
Water Quality Health Hazards
Biological Impacts Visual Impacts
Geology/Soils Cultural Resources
Land Use Other (Specify)

Please turn in this sheet as requested by the hearing officer.

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Please mail your comments to: Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: We need to get Suzanne assistance
in the PAFEB Mobile Home Park. We're unable to
move our home's out. Some way needs to be
worked out as we can't afford to live in
these places any more.

Statement(s) Attached Yes No

*Filling out this form is not required, but it is recommended.
The hearing officer will call first on those who have completed
and turned in comment sheets before recognizing persons who have
not. Thank you for your cooperation.

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

99 - The text has been changed in the FIS based on the availability of new data. See Section 3.12, page 3.27. The addition of the remaining town forest acreage within the boundaries of phase APB to the Newton Center Historic District will be considered during preparation of the reuse FIS. According to the Newton Center Historic District National Register of Historic Places nomination form, published information is insufficient to support the widely held belief that the town forest was the first in the country.

Name: BADEBAGAD HULU
Address: 168 LITHE BAY ROAD NERAMPATTAN NH 03081

Check the category to which you belong: Business Person Other ☒

Landowner

Check the participant category to which you belong:

Public ☐ Designated Representative ☐ Private Citizen ☐

Official ☒ Of Private Organization ☐

Check here if you wish to ask a question during the hearing. ☐

Check here if you wish to offer oral comments. ☒

Check here if you wish to submit a written statement. ☒

Check here if you wish to receive an EIS. ☒ draft

Check here if you wish to receive an EIS. ☒ final

(please check all that apply):

Area of question or comment _____	Public Services & Facilities _____
Air Quality _____	Health Hazards _____
Water Quality _____	Visual Impacts _____
Biological Impacts _____	Cultural Resources _____
Geology/Soils _____	Other (Specify) <u>HISTORIC RESOURCES</u>
Land Use _____	

Please turn in this sheet as requested by the hearing officer.

Written comments will be considered in preparation of the final ERS. You may use this sheet to submit written comments either in the space provided below, on the back, or in an attached statement. Written comments may also be submitted in a letter or other format, but regardless of format, comments must be submitted on or before February 12, 1990.

no later than 13 February 1990.

DR. HUGH: SAC/DEV
HQ SAC/DEV
OFFUTT AFB, NE 68113-5001

COMMENTS: THE IS DRAFT PAGE 3-26 STATES INCORRECTLY ONLY ABOUT 10 ACRES OF APPROXIMATELY 100 ACRES REMAINING OF NEWMANLAND OLD TOWN FOREST (1440) WAS ACQUIRED BY THE STATE. ~~THE~~ THE OLD TOWN FOREST SECTION ON PAGE 26 MEANS. ~~THE~~ THE NEWMANLAND TOWN PLACER NAMED ON THE NATIONAL REGISTER OF HISTORIC PLACES IT SHOULD BE POSSIBLE TO RECOMMEND THE EXTENSION OF THE OLD HISTORIC DISTRICT TO INCLUDE THE SECTION OF THE OLD TOWN FOREST ON BASE LAND. Yes ___ No ___

REGARD THE CLOSURE EXISTING TOWN FOREST.

*Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

REUSE

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

100 - A change in enrollment at the Newington Elementary School due to the closure of Pease AFB would be a socioeconomic impact. As stated previously, the Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

Name: BARBARA D. HILL
Address: 168 LITTLE BAY ROAD
NEWINGTON NH 03801

Check the category to which you belong:
Landowner _____ Business person _____ Other _____

Check the participant category to which you belong:
Public _____ Designated Representative _____ Private
Official ☒ Of Private Organization _____ Citizen _____

Check here if you wish to ask a question during the hearing. _____

Check here if you wish to offer oral comments. ☒ _____

Check here if you wish to submit a written statement. ☒ _____

Check here if you wish to receive an EIS. ☒ draft
☒ final

Area of question or comment (please check all that apply):

Air Quality _____ Public Services & Facilities _____

Water Quality _____ Health Hazards _____

Biological Impacts _____ Visual Impacts _____

Geology/Soils _____ Cultural Resources _____

Land Use _____ Other (Specify) SOCIOECONOMIC IMPACT

Please turn in this sheet as requested by the hearing officer.

Written comments will be considered in preparation of the final

EIS. You may use this sheet to submit written comments either in

the space provided below, on the back, or in an attached

statement. Written comments may also be submitted in a letter or

other format, but regardless of format, comments must be submitted

no later than 13 February 1990.

Please mail your comments to : Dr. Hugh Stirts

HQ SAC/DEV

Offutt AFB, NE 68113-5001

COMMENTS: THE EIS DRAFT PAGE 4-9 OVER LOOKS SPECIFIC IMPACT

OF THE TRAILER PARK IN NEWINGTON AT THIS TIME

ABOUT 16 PEASE CHILDREN ATTEND NEWINGTON ELEMENTARY

SCHOOL. THE DRAFT IS CALLED OUT ON 66 STUDENTS

WHICH IMPACT THE SCHOOL. CERTAINLY MEMORIAL

SHOULD BE MADE OF THE DISPOSITION OF

THE TRAILER PARK

Statement(s) Attached _____ Yes _____ No _____

*Filling out this form is not required, but it is recommended.

The hearing officer will call first on those who have completed

and turned in comment sheets before recognizing persons who have

not. Thank you for your cooperation.

COMMENT SHEET *
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

P-26/Jan 90

Name: ALAN M. ROBERTSON
Address: 3 Kierleuie
STRATHAM, N.H. 03885

Check the category to which you belong:
Landowner ☒ Business Person ☐ Other ☐

Check the participant category to which you belong:
Public Designated Representative ☐ Private Citizen ☒
Official ☐ Of Private Organization ☐

Check here if you wish to ask a question during the hearing. ☐

Check here if you wish to offer oral comments. ☐

Check here if you wish to submit a written statement. ☒ draft ☐ final

Check here if you wish to receive an EIS. ☒ draft ☐ final

Area of question or comment (please check all that apply):

- Air Quality ☐ Public Services & Facilities ☐
- Water Quality ☐ Health Hazards ☐
- Biological Impacts ☐ Visual Impacts ☐
- Geology/Soils ☐ Cultural Resources ☐
- Land Use ☐ Other (Specify) ☐

Please turn in this sheet as requested by the hearing officer.

Written comments will be considered in preparation of the final EIS. You may use this sheet to submit written comments either in the space provided below, on the back, or in an attached statement. Written comments may also be submitted in a letter or other format, but regardless of format, comments must be submitted no later than 13 February 1990.

Please mail your comments to: Dr. Hugh Stirts

HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: THE PEASE EIS DOES NOT APPEAR TO IDENTIFY THE PEASE AVE IMPACTS ON THE CLOSURE OF THE BASE COMMUNITY. I WILL HAVE TO THE 5000+ MEMBERS OF THE BASE COMMUNITY AND RESERVISTS MEMBERS INFORMED TO USE THESE FACILITIES. I WOULD ASK THAT I WOULD LIKE TO SEE THE IMPACT REPORT, AND I WOULD LIKE A WRITTEN RESPONSE TO MY COMMENTS.

Statement(s) Attached ☒ Yes ☐ No

*Filling out this form is not required, but it is recommended. The hearing officer will call first on those who have completed and turned in comment sheets before recognizing persons who have not. Thank you for your cooperation.

101 - Impacts of base closure on members of the NHANG and reservists are socioeconomic impacts. As stated previously, the Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS. Also refer to response 66.

GORDON J. HUMPHREY
NEW HAMPSHIRE

511 HART STREET, SUITE 200
PORTSMOUTH, NH 03801
AGE 50
PH 603 271-1343
NEW HAMPSHIRE TOLL FREE NUMBER
1-800-453-3711

United States Senate
WASHINGTON, DC 20510

COMMITTEE
JUDICIARY
FOREIGN RELATIONS
ENVIRONMENT AND PUBLIC
WORKS

20510

January 25, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Dr. Stirts:

The Environmental Impact Statement (EIS) prepared for the closure of Pease Air Force Base is astonishingly flawed in one key respect: it utterly fails to address the economic effects of the closure on New Hampshire's Seacoast region.

The discussion of socio-economic effects in the closure EIS, which is required under the National Environmental Policy Act, completely glosses over the loss of 4,500 jobs and the residual implications. Incidentally, the EIS states that economic consequences of the closure will be assessed in a subsequent EIS addressing reuse of the Pease facility. It is plainly apparent that there will be socio-economic effects associated with the closure of this base, as well as with its reuse.

The importance of an adequate assessment of the economic consequences of the closure at Pease was recently made apparent when it was learned that the Navy may be contemplating work reductions at the nearby Portsmouth Naval Shipyard, which could result in the loss of 1,100 more jobs in the region. It is obvious that the public, the press and other federal agencies need better data about the Pease closure.

A major function of an Environmental Impact Statement is to increase public awareness of the problems which will result from major federal activities. This EIS has missed a major point. The closure of Pease will cause economic dislocation which must be planned for.

I urge you to ensure the final EIS addresses this issue.

Sincerely yours,

Gordon J. Humphrey
Gordon J. Humphrey, USS

One Extra Stamp
Checkmark for EIS/1
PHS 215-2415

117 Main St
Portsmouth, NH 03801
PHS 715-1600

102a - The following Air Force response was provided to Senator Humphrey.



DEPARTMENT OF THE AIR FORCE
WASHINGTON DC 20330-1000

OFFICE OF THE SECRETARY

March 23, 1990

The Honorable Gordon J. Humphrey
United States Senate
Washington, D. C. 20510-0001

Dear Senator Humphrey:

This is in response to your letter of January 25, 1990, to the Director of Environmental Management, Headquarters Strategic Air Command, regarding analysis of economic effects associated with the closure of Pease Air Force Base, New Hampshire.

The closure of Pease Air Force Base will cause economic changes for which planning should occur. The Air Force is working with the Office of Economic Adjustment (OEA) in whatever capacity we can to help plan the future of an area which has been very good to us. Where we disagree is with the contention that such planning must be done within the confines of an Environmental Impact Statement (EIS) that is limited to the manner in which the Air Force phasedown is to be managed.

About ten years ago a number of Federal courts stated that socioeconomic impacts were not the kind of significant environmental impacts that would require a Federal agency to prepare an EIS, but that socioeconomic impacts should be discussed were an EIS being otherwise prepared. However, the Supreme Court and other Federal courts have recently begun to emphasize the requirement for effects to have a close causal connection to changes in the biophysical environment. The Council on Environmental Quality (CEQ) regulations, which the Supreme Court has deferred to as authoritative, state that social and economic effects will be discussed when they are interrelated to natural and biophysical effects. We simply do not believe that socioeconomic effects are closely related to the actions before us.

In contrast to prior base closure EISs, the Pease Air Force Base closure EIS has no connection whatsoever with the decision to close the base. This is also true at the other bases being closed pursuant to the Base Closure and Realignment Act. The recommendation to close Pease was made by the Secretary of Defense's Commission on Base Realignments and Closures, was endorsed as a decision

by the Secretary of Defense, and was not disturbed by the Congress. Socioeconomic factors were a part of that process, but that process was specifically exempted by Congress from the National Environmental Policy Act (NEPA). The statutory time to challenge the closure decision has passed, and no amount of socioeconomic analysis in an EIS can affect the final nature of that decision. Unlike past base closures, the purpose of the closure EIS is not to decide whether to close the base. The purpose is the narrower one which follows such a decision -- helping the Air Force cease operations intelligently.

Closing the base entails removing planes and people, and providing for protection of the base until we dispose of it. Those actions are relatively uncomplicated environmentally. The regulations implementing NEPA do require the Air Force to discuss socioeconomic effects when they are interrelated with natural or physical effects. However, it was our conclusion, which public comment on the document has not given us reason to change, that there are no socioeconomic effects closely related to the environmental impacts of the fairly ministerial steps required to close the base. Under the CEQ regulations mentioned above, therefore, there is no occasion for dwelling on socioeconomic effects in the closure EIS.

We do plan to analyze socioeconomic impacts in the upcoming reuse EIS. Without doubt there will be a strong interrelationship between the impacts, biophysical and social, that will be generated by different ways of making new use of the facilities. In some sense it will be like planning a new town, whose economic growth causes direct and indirect environmental impacts. As previously announced, we will solicit the Reuse Committee's assistance in that process and in formulating reuse plans. We will share socioeconomic data with the Reuse Committee to assist it in its planning. Impacts, both positive and negative, will be discussed in the EIS to help the Air Force make its decisions on disposal and reuse. We believe these things are required of us, and we will accomplish them to the best of our ability.

We regret that we cannot offer a more agreeable reply, but we do not believe any law casts the Air Force in the role of central economist and social engineer for the local communities. Although we are pleased to support the efforts of others like OEA, we must devote the bulk of our resources to accomplishing the tasks which in fact have been given us.

We hope the information provided is helpful.

Sincerely,


EUGENE J. RONSICK
Colonel, USAF
Chief, Program Liaison Division
Office of Legislative Liaison

GORDON J. HUMPHREY
NEW HAMPSHIRE
631 MAINT BLDG OFFICE BUILDING
DOD 11-4-241
FAX BLDG
DOD 11-4-241
NEW HAMPSHIRE
1-603-873-7115

United States Senate

WASHINGTON, DC 20510

February 1, 1990

COMMITTEES
JUDICIARY
FOREIGN RELATIONS
ENVIRONMENT AND PUBLIC
WORKS

102b - The following Air Force response was provided to Senator Humphrey.



DEPARTMENT OF THE AIR FORCE
WASHINGTON DC 20330-1000

March 23, 1990

OFFICE OF THE SECRETARY

Dr. Hugh Stirts
HQ SAC/DEV
Offut AFB, NE 68113-5001

Dear Dr. Stirts,

I am writing to request your assistance on an issue associated with the Environmental Impact Statement for the closure of Pease Air Force Base.

As you may know, the Defense Logistics Agency recently announced that it would be accepting bids to clean up contaminated groundwater and soils at the Defense Fuel Supply tank farm in Newington, New Hampshire. Understandably, this announcement prompted many town residents and officials to call for the Air Force to include this issue as part of the closure EIS.

While the closure of Pease will most certainly have a direct effect on the future disposition of the tank farm, it remains unclear whether the Defense Logistics Agency or the Air Force will retain jurisdiction over this facility. Clearly, if the Air Force is ultimately responsible for the disposition of this facility, then its future status should be addressed in the EIS deliberations.

In light of these concerns, I would like you to answer promptly the question of how the Air Force plans to address this issue in the Pease EIS. Further, I would like to know how the continuing clean-up efforts at the Newington tank farm relate to the ongoing Superfund activities at the remainder of the base.

Thank you for your assistance on this important matter.

With warmest regards, I am

Sincerely yours,

Gordon J. Humphrey
Gordon J. Humphrey, US

GJH/jm

One State Street
Boston, MA 02109
PHONE 713-2443

101 Main Street
Boston, MA 02109
PHONE 713-2440

The Honorable Gordon J. Humphrey
United States Senate
Washington, D. C. 20510-0001

Dear Senator Humphrey:

This is in response to your February 1, 1990, letter to the Director of Environmental Management, Headquarters Strategic Air Command, regarding the Defense Fuel Supply facility in Newington, New Hampshire.

Defense agencies are not allowed to be accountable for real property. Therefore, the Air Force is the real property agent for the Newington Defense Fuel Support Point operated by the Defense Logistics Agency (DLA). DLA operates the facility independently of the Air Force, supplying other regional Department of Defense (DoD) customers as well as ourselves. DLA's Newington facility is not part of the Pease closure EIS because of the facility's independent status. Throughout the closure process we have expected to retain the real property records for the Newington facility and ultimately assign another of our bases as agent for the property after Pease Air Force Base closed.

Regarding the relation of the Newington facility to the National Priorities List (NPL) status of Pease Air Force Base, the facility is not included in the Pease listing. The Environmental Protection Agency lists the facility separate from Pease Air Force Base in their Federal Facility Docket. As the operator of the facility and by DoD policy, the DLA is responsible for the cleanup of any contamination resulting from their operations on the property. Currently, DLA is conducting an environmental cleanup of the Newington facility. Their cleanup plans must satisfy State of New Hampshire and EPA environmental officials that the facility cleanup has met applicable standards. Details of their program, which is separate from the Air Force's, would have to be obtained from DLA.

DLA recently expressed a desire to phase out its Newington operations, but not for another 12 to 24 months. Any required compliance with the National Environmental Policy Act (NEPA)

regarding that proposal is DLA's responsibility. However, we will ask DLA to provide analysis of continuing the facility's use as a fuels supply point after completion of the cleanup. This information would serve to determine its potential for reuse. If DLA decides to close the facility, we would include it in the Pease Reuse EIS as part of the total disposal effort.

We hope the information provided is helpful.

Sincerely,



EUGENE J. RONSICK
Colonel, USAR
Chief, Program Liaison Division
Office of Legislative Liaison

91 Powwow River Road
East Kingstons, NH 03827

January 25, 1990

Dr. Hugh Stirtz
Environmental Management
HQ SAC/DEV
Offutt AFB, NE
68113-5001

Dear Dr. Stirtz;

Attached are my comments on the Draft Environmental Impact Statement for the closure of Pease AFB in New Hampshire. These comments are based on more than 10 years experience in working with the NEPA process prior to my retirement from the U.S. Forest Service, both as Environmental Coordinator at the National Forest level, and preparing NEPA documents at the Ranger District level. Never have I seen a sloppier, more inadequate, and unprofessional treatment of the NEPA process as this document represents.

In my estimation, the process first became flawed when the Secretary of Defense failed to submit a Legislative EIS to accompany the proposed Base Closure and Realignment Act that was sent to the Congress in 1988, as required by the NEPA and the CEQ Regulations; and the process went downhill from there. I have learned, through discussions with a member of Senator Warren Rudman's staff, that the decision to circumvent certain aspects of the NEPA process (the discussion of alternatives), thus bastardizing the entire process, was instigated by Rep. Dick Army of Texas. This was done because previous attempts at base closure, which did receive full treatment under NEPA, resulted in no bases being closed; so the thinking was that if any bases were to be closed under the new proposal, the only way to do it was to include language in the BCA to ignore the part of NEPA that was causing the problem. This is hardly in compliance with either the spirit or letter of the law.

I would be very interested in seeing how the Environmental Protection Agency rates this document in terms of compliance with NEPA and the CEQ Regulations, especially in light of their concerns regarding alternatives related to other projects being proposed in New Hampshire by other Federal agencies.

Sincerely,

Lawrence K. Smith
Lawrence K. Smith

cc: Pease AFB Redevelopment Commission, Portsmouth, NH
Environmental Protection Agency, Boston, MA
Environmental Protection Agency, Washington, DC
Council on Environmental Quality, Washington, DC

103 - Your comments are noted. However, your comments regarding the actions by Congress on base closures are outside the scope of this EIS. It is the opinion of the Air Force that they have complied with the provisions in Public Law 100-526 (Base Closure and Realignment Act) and those provisions of NEPA not specifically modified by the Act. Refer to response 213 for the EPA rating of the DEIS.

Executive Summary

Page S-1; 1) 2nd. para.- state that alternate methods of carrying out closure will be discussed, but Chap. 2-Alternatives, contains no such discussion, only a shopping list of who goes where and how they're going to get there. 2) 4th para- "Programmed force structure discussed in separate environmental assessment" - what is that document, who prepared it, and is it incorporated by reference in this EIS?

Page 1-1; Sec. 1.1- Introduction
1) Last paragraph has reference to modification of NEPA process. By what authority did the Secretary of Defense propose legislation to do this? NEPA and the CEQ regulations contain no provision for modification of the process. Statutory requirements for EIS are in 40CFR1502.3; timing for preparation is covered in 1502.5.
2) NEPA and CEQ require a Legislative EIS to be prepared to accompany proposed legislation and reports to Congress prior to a decision being made. Alternatives to closure should have been discussed at this stage in the process. (CEQ 1506.8)
3) During the NEPA process, no action can be taken which will limit the choice of reasonable alternatives. ((CEQ 1506.1(a)(2).))

Page 1-6; Sec. 1.2- Location
Pease AFB also abuts the Town of Greenland.

Page 1-7; Sec. 1.4.1 - General Environmental Policy
There is only a general reference to "CEQ", but the actual regulations (40 CFR 1500-1508) are not specifically cited.

Chapter 2-Alternative - see previous comments

Chapter 3-Affected Environment
Needs maps to accompany the discussion of various resources so that the reader can relate to their location on the base.

Page 3-28; Sec. 3.13 - Socioeconomics
This entire section is a complete cop-out, and a rather loose interpretation of 40CFR1508.14. How anyone in their right mind can say that there are no socioeconomic impacts resulting from base closure is incomprehensible. The second sentence of paragraph two is sufficiently vague as to be totally ambiguous.

Chapter 3 is supposed to discuss the socioeconomic environment as it exists now; chapter 4 should discuss effects of closure on that environment. Don't wait until Bechtel Corp. finishes their report just so you can copy it.

Page 3-37

Figure 3-4 does not show the often used flight paths (with their accompanying noise levels) that cross East Kingston, Kensington, and Hampton in an east-west direction.

104 - Development of alternate methods for closing a base are difficult; the only real alternatives are how to move personnel and supporting equipment. As you noted, Chapter 2 does accomplish this. The programmed force structure is the withdrawal of the F-111's, a decision that was made prior to the enactment of the Base Closure and Realignment Act. This withdrawal is the subject of a separate EA that has now been completed and is incorporated, by reference, in this FEIS in Section 2.1 on page 2-1. Copies are available upon request (preferably written) from Pease AFB. The EA was written by the Corps of Engineers, Omaha District, under contract to HQSAC. This EIS discusses the cumulative impacts of the force structure action, the closure of Pease, and the continued activities of the NHANG.

105 - These comments pertain to the Base Realignment and Closure Act legislative process, which is not the subject of this EIS.

106 - The town of Greenland has been added to the discussion of location in the FEIS in Section 1.2 on page 1-2. The CEQ Regulations have been specifically cited in the FEIS in Section 1.4.1 on page 1-8.

107 - Only those figures necessary for a succinct presentation of the affected environment and environmental consequences were included in the EIS.

108 - Your comments are noted. An EIS is required to discuss socioeconomic effects only when such effects are interrelated with natural or physical effects. During preparation of the EIS, the Air Force considered whether any indirect biophysical effects could be attributed to socioeconomic impacts; no such interrelationships were found. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

109 - Flight tracks are not precise routes strictly adhered to in all circumstances. Variations are allowed for safety and air traffic reasons. The route described by the commentator is believed to be a variation of the normal radar pattern. Such a variation could be necessitated by the number of planes or the air speed of planes in the pattern. Noise would not be considered a problem in this pattern because aircraft would be operating at an altitude of 2,000 feet above mean sea level (m.s.l.) and would not generate the time-averaged level of 65 decibels (dB) at ground level used as the threshold for noise consideration.

USAF EIS- Pease APB - L.Smith- page 2.

Page 4-1; Sec 4.1 - Introduction
The first sentence is incorrect - there is no discussion of impacts on the Socioeconomic Environment, or on Aircraft Safety, both of which are included (to some degree) in Chapter 3.

Page 4-18; Sec. 4.17
1) 1st. paragraph, line 8 - "Transport by cargo aircraft..." , not "of".
2) 2nd. paragraph, line 8 - "...New Hampshire Department of Transportation ..." , not "Roads".

I look forward to seeing a much improved document when the Final EIS is published.

110 - The sentence has been changed to clearly state that the socioeconomic environment was not considered. The new wording is found in Section 4.1, page 4-1. A discussion of aircraft safety is presented in Section 4.17, page 4-20, of the FEIS. Editorial corrections have been made.

Rockingham
Planning
Commission

121 Water Street Exeter, NH 03833 (603) 778 0885

January 26, 1990

Dr. Hugh Stirte
HQ SAC/DEV
Offutt AFB, NE 68113-5001

RE: DRAFT EIS, CLOSURE OF PEASE AIR FORCE BASE

Dear Dr. Stirte:

We are in receipt of the Draft Environmental Impact Statement for the Closure of Pease AFB. A special subcommittee of the Rockingham Planning Commission was created to review this and subsequent Environmental Impact Statements relative to Pease. On behalf of the committee, I am submitting the following comments for your consideration:

General

The Draft EIS (DEIS) is well organized, clearly written but seriously incomplete. Our major complaint is the lack of adequate documentation of existing conditions and consequences, pertaining to hazardous waste sites, hydrological conditions, and socioeconomic impacts. Given the fact that the study of alternatives in this EIS is limited by the provisions of the Base Closure Act, the main function and value of the EIS is to document existing conditions and to assess the impacts of closure on those conditions. The EIS falls seriously short in this regard.

The Draft EIS specifically assigns socioeconomic analyses to the second "re-use" EIS. We believe socioeconomic impacts of the closure itself is a major concern and should be adequately addressed in this report. This is particularly important since it is likely that the base closure will pre-date its redevelopment by a considerable period.

Section 1.2 Location

Pease AFB also abuts the Town of Greenland.

Section 1.3 Scoping Process

Paragraph 3 suggests that all concerns relative to closure will be addressed in this EIS and that identified concerns relevant to base disposition will be addressed in both this and a separate EIS. In fact, many of the scoping issues listed pertaining to socioeconomic factors are not addressed in any meaningful way in the DEIS. It is not correct to assume that all socioeconomic impacts are associated primarily with the re-use of the base.

111 - These general comments are expanded upon in subsequent discussions in your letter and are noted. With regard to socioeconomic impacts, refer to the socioeconomic analysis as related to the reuse EIS described in Section 4.11, page 4-9.

112 - The town of Greenland has been added to the discussion of location in the DEIS. As explained in Section 3.13 of the DEIS, socioeconomic impacts caused by the closure of Pease AFB are not interrelated with any natural or physical environmental effects. Therefore, it was not necessary for the completeness of the environmental analysis to discuss these impacts. The DEIS did not assume that all socioeconomic impacts are associated primarily with the reuse of the base.

In particular, short term socioeconomic effects will be related primarily to the closure itself.

Section 1.4 Relevant Statutes and Regulations

Local regulations are not discussed. Certainly the resumption of local zoning authority subsequent to the base closure is an important consideration.

Also, the Federal Estuarine Research Reserve program is not mentioned but should be since the Great Bay was recently designated as a National Estuarine Research Reserve.

Section 2.1 Introduction

The third paragraph references a "separate environmental impact document" but no further information is given. What is its title, purpose, scope? Who prepared it? What is its relationship to this DEIS?

Section 2.2 Detailed Description of Closure

This provides the best, most complete description of the closure process available to date to the general public.

Section 2.2.2 HEAVY DUTY

Regarding discussion of JP-7 & JP-4 fuel storage conversions, fuel lines, etc., a map showing their location should be provided.

Section 3.2 General Description

It is essential in evaluating environmental impacts to include basic maps of the physical features of the base, including topography, surface water, soils, road/utilities, facilities, and land cover. None of these maps are included in the Draft EIS. Without them it is difficult to understand the relationship between existing environmental hazards and the resources they may impact.

Section 3.4 Hazardous Materials and Solid Waste

Some of our most serious concerns pertain to this section. The narrative section describing fuel storage facilities, hazardous materials handling and their composition is very good and appears comprehensive. It suffers significantly, however, from the lack of maps showing the location of fuel tanks and waste generation sites, or any cross reference to a listing of tanks and sites describing their disposition during closure.

113 - The resumption of local zoning authority subsequent to the base closure will be an important consideration in the reuse EIS. A discussion of the proposed designation of the Great Bay area as a National Estuarine Research Reserve was presented in Section 3.8.2 of the DEIS. This discussion has been updated in the FEIS on page 3-23.

114 - Refer to response 104. The title of the document is "Environmental Assessment for the Force Structure Action at Pease Air Force Base" dated February 1990. Its purpose was to assess the impacts of the inactivation of two bombardment squadrons and a munitions maintenance squadron, which were identified in Section 2.1 of the DEIS. The assessment was used in this EIS to assess cumulative impacts.

115 - Your comment regarding the description of closure is noted. The bulk fuel storage area is shown in figure 2-2. The tank located within the chain link fence is the tank which will be converted. A figure presenting the topographical features in the vicinity of the base has been added to the FEIS in Section 1.2 on page 1-6.

Section 3.4.1 Underground and Above Ground Tank Storage

An annotated map should be included showing the location of storage tanks (above and below ground tanks), keyed to an inventory of those tanks.

Section 3.4.2 Hazardous Materials/Waste Storage

This section is incomplete in several respects. There is no map showing all suspected sites (only one is provided which shows only very generally the location of the five Expedited Remedial Action Sites). There is no characterization of the non-expedited remedial action sites. The status of the other sites studied by Roy F. Weston during Phase II of the investigation is not completely clear. Where are these sites? What do we know about them? We suggest incorporating relevant portions of the Weston studies into the DEIS. This is among the most important and relevant information that could be included in the document.

Section 3.6 Groundwater

The information presented here would be great, enhanced if it included a map showing the aquifer location in relation to wells, fuel storage facilities and waste sites. Again pertinent excerpts from the Weston report should be incorporated here.

Section 3.7 Surface Water

The map provided does not show the relevant drainage pattern. A topographic map showing perennial streams should be included.

Section 3.8.2 Wetland Resources

This section should be updated to reflect the fact that designation of the Great Bay as an Estuarine Research Reserve has already been accomplished.

Section 3.13 Socioeconomics

The first two sentences reflect an overly narrow interpretation of the NEPA statute (See 1508.14 - Human Environment" of the NEPA statute). Even so, following the stated rationale, it can be easily demonstrated that natural and physical environmental effects of closure are interrelated to socioeconomic consequences. The effects of the disposition of hazardous waste sites is one obvious example.

We believe strongly, as stated earlier, that the socioeconomic consequences of closure should be addressed in this EIS. One compelling reason to do so is that those consequences will be experienced before the base is redeveloped to a significant extent.

116 - Figures showing the location of the IRP sites are presented in Appendix H. Detailed discussions of each hazardous waste site can be found in the documents listed in Appendix H. The discussion in the EIS regarding hazardous waste sites is intended to be an overview for the reader. As you correctly noted, more detailed information exists in the IRP documents. To include this information in this EIS would be a duplication of effort and an encyclopedic presentation, discouraged by the CEQ Regulations. Once these IRP documents are approved by the regulatory agencies (EPA Region I and the State of New Hampshire), they are public information. Refer to responses 40 and 96 also.

117 - A figure showing the location of the base aquifer is not considered to be necessary because Section 3.6 explains that the aquifer is located in the center of the base under the flightline. Figure 2-2 shows the location of the bulk fuel storage area in relation to the runway. Figure 3-1 shows the location of the wells and waste sites in relation to the runway.

118 - Refer to response 115.

119 - Section 3.8.2 on page 3-23 in the FEIS has been updated.

120

Clearly it is true that certain socioeconomic impacts are attributed to the closure of the base while others are associated primarily with its redevelopment. We believe that, at a minimum, the closure impacts should be addressed in this DEIS. The data generated from such a study would be of significant value to the redevelopment effort. More importantly, it would enable the communities and organizations to gauge and anticipate the short term effects of closure on the region's economy, labor force, housing, health care, etc.

The data that is presented on the area's economy, population, employment is helpful and well presented, but doesn't go far enough.

Section 4.2

Soil Resources

This section refers to consequences that are far beyond the scope of "soil resources". Specifically, impacts relative to underground tank removal and hazardous waste removal are discussed (though not fully assessed). While it is true that these will effect soils, their importance is related to impacts on groundwater and public health. The same comment applies to the discussion of the removal and transport of radioactive sources. Why this appears under "Soils" is unclear; whether this issue can be adequately addressed in one sentence is doubtful.

We suggest that a new Chapter 4 section be added called "Public Health" in which these items are more fully addressed.

Section 4.4

Groundwater Resources

The statement in the first paragraph "...all hazardous materials and hazardous wastes will be removed during closure of the base", is probably incorrect. As we understand it, under the forthcoming interagency agreement, certain locations identified for remedial action will be excluded from the base property transfer. All indications are that they will not be cleaned up before closure of the base.

No discussion is included about the consequences of the changes in fuel storage configuration which was described in detail in Chapter 3 (removal, abandonment, etc.). This is a significant omission and should be addressed.

Sections 4.11, 4.12, 4.13

Considering the near certainty that the base closure/realignment will be completed before substantial economic redevelopment of the property occurs, the short-term consequences of closure on employment, government revenues and housing should have been addressed. (Recall from the author's own statement in paragraph 2, section 4.1 that "...Both short-term and long-term effects are relevant ...").

120 - Refer to responses 9 and 102a. Also, as noted earlier, the Air Force plans to do socioeconomic analysis as related to the reuse EIS described in Section 4.11, page 4-9.

121 - The ground water resources discussion referenced the soils resources section rather than repeating the discussion. The statement regarding radioactive sources was presented in the soils section because that is where most hazardous materials and wastes are discussed. Your concern regarding the adequacy of the statement is not explained. A new section that more fully addresses public health items is not warranted because closure of the base will reduce the potential for accidental releases of materials and resulting contamination of soil and ground water.

122 - The statement that "...all hazardous materials and hazardous wastes will be removed during the closure of the base" is incorrect. Hazardous materials NOT required by the operations of the NHANG (i.e., "ush, oil, and so forth) will be removed during closure. Remediation of hazardous wastes sites and the possibility of long-term monitoring will continue, as required, after base closure. As the interagency agreement is still being worked out, it would be premature to speculate on its contents. The IRP, as an independent program from base closure, will continue. The Air Force is committed to continuing all remedial actions in accordance with Federal and State laws. Refer to response 96 for discussion regarding potential land transfer exclusions. As stated in Section 4.2, all underground storage tanks and associated piping systems not to be used by the NHANG will be rendered temporarily out of service pending reuse decisions.

Dr. Hugh Stirts
Pease DEIS
Page 5

123

Regardless of what the ultimate reuse may be, the region will have to contend with the short-term effects of loss of employment, tax revenue loss, increased vacancy rate for housing (a positive impact), loss of labor force, etc. These effects should be quantified to a reasonable extent in this EIS.

124

Appendix B The inclusion of a site map keyed to each listed "location of accumulation" would make this inventory much more useful.

125

As a final note, I would like to comment that, despite its significant flaws (mostly omissions), the Draft EIS is very well written and is one of the most readable documents of its kind I have recently encountered. The authors should be commended for their efforts in producing a concise, accessible document, rather than one which "blinds with bulk".

Our sincere hope and expectation is that the various omissions and errors pointed out here and by other reviewers will be addressed in the final EIS. If this agency can be of any assistance in this regard please do not hesitate to contact us.

Sincerely,

Cliff Sinnott

Cliff Sinnott
Executive Director

CS:alp

cc: George Jones, Chairman Pease AFB Redevelopment Commission
Peggy Lanson, Chairman, Newington Board of Selectmen
Calvin Canney, Portsmouth City Manager
Robert Varney, Commissioner, NHDES

123 - Refer to responses 9 and 102a.

124 - Such information is more appropriate for inclusion in real estate transfer documents. As Section 4.2 states, storage facilities will be cleaned as necessary upon removal of hazardous wastes.

125 - Your kind comments are noted.

SRPC

County Courthouse
County Farm Road
Dover, NH 03820
(603) 742-2523

Strafford Regional Planning Commission

2/2/90

January 29, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Dr. Stirts:

The purpose of this letter is to convey the comments of the Strafford Regional Planning Commission on the Draft Environmental Impact Statement for the Closure of Pease Air Base (December, 1989), which was prepared by your office. For background, we are a regional planning agency representing all 13 municipalities in Strafford County, NH as well as the towns of Newmarket, Northwood, and Nottingham in Rockingham County, NH. We are also the lead planning agency of the Seacoast Metropolitan Planning Organization.

At their meeting on January 23, 1990 the Executive Committee of the Strafford Regional Planning Commission passed a motion stating that the Air Force should document and analyze the socioeconomic impacts of the closure of Pease AFB in this Draft EIS. Since the Air Force did not discuss the socioeconomic impacts on the Draft EIS, we believe you should include this analysis in the final EIS. We believe that postponing this analysis until the "second EIS" dealing with the final disposition of the base is inappropriate since it will not help the affected communities in their effort to deal with the short-term consequences of the impending closure. This is especially critical in this case because Pease is the first Air Force base to close and the timetable is very short.

We noted these concerns in a letter dated July 28, 1989 (copy attached) to Colonel James Wilson of Pease AFB and requested clarification on when the Air Force planned to analyze the socioeconomic impacts of the closure. Our agency never received a response to this letter.

We are legitimately concerned about the short-term socioeconomic impacts of the closure of Pease AFB. This concern is based on data from Pease AFB that over half of the Pease military personnel who live off base live in the metropolitan portion of our planning region (862 of 1643). Our communities with the largest number of resident Pease AFB military personnel are Dover (429), Rochester (170), Newmarket (116), and Somersworth (76).

We disagree with your interpretation of the National Environmental Policy Act (NEPA) as stated on page 3-28 of the Draft EIS:

An EIS is required to discuss socioeconomic effects only when such effects are interrelated with natural and physical effects.

BARRINGTON • DOVER • DURHAM • FARMINGTON • LEE • MADBURY • MIDDLETON • MILTON • NEW DURHAM • NEWMARKET
NORTHWOOD • NOTTINGHAM • ROCHESTER • ROLLINSFORD • SOMERSWORTH • STRAFFORD

126 - Your letter of 28 July 1989 subsequently has been responded to by Colonel Wilson. With regard to your comments concerning the need for socioeconomic analysis, please see responses 9 and 102a.

Dr. Hugh Stirts

-2-

January 29, 1990

Based on our experience with the EIS process, we believe that socioeconomic impacts of an action must be documented and analyzed in the EIS.

We also disagree with your statement also on page 3-28 of the Draft

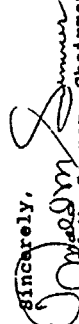
EIS: ...the Air Force is working with the OEA (Office of Economic Adjustment) to assist those communities expected to be hardest hit as a result of base closure.

We are not aware of any direct involvement by the OEA or Air Force with the communities of Dover, Rochester, Newmarket or Somersworth which your own figures imply would be hardest hit by the closure. These and other communities in our region are currently preparing municipal budgets without the benefit of any specific information or assistance from the Air Force or the Office of Economic Adjustment regarding the impacts of the closure of Pease AFB on their communities.

If you have any questions regarding these comments on the Draft EIS, please contact me or our Executive Director, Paul Smith.

Thank you for your assistance and cooperation.

Sincerely,


Donald M. Sumner, Chairman
Strafford Regional Planning Commission

DMS/fha

127 - Refer to responses 9 and 102a. The Air Force and OEA have worked with and assisted the Pease AFB Redevelopment Commission with base reuse planning activities. The Commission is specifically mandated by state law to consider the redevelopment of Pease AFB. Assistance from OEA was formally requested by the Commission, which is the primary local contact for OEA activities. OEA was established to aid communities facing base closures to provide one focal point for this type of assistance. The Department of Defense relies on OEA for this role.

CPA

288 Central Avenue
Dover, New Hampshire 03820
(603) 742-3551

2/15

City of Dover, New Hampshire

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

January 29, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

We would appreciate you providing a description of the extent to which the socioeconomic impacts of the Base Closure will be documented and analyzed by the Air Force in the Environmental Assessment/Environmental Impact Statement process. If such an analysis is to be performed by the Air Force, we would like to know when it would be performed and how it relates to the process of preparing two environmental analyses.

Dear Dr. Stirts:

The City of Dover, NH Planning & Community Development Department has reviewed and evaluated the subject document. Please find attached for your use a copy of our comments that was initially sent to the Environmental Clean-Up Advisory Committee of the Pease Redevelopment Commission.

It is the position of our agency that the socioeconomic impacts of the proposed closure of Pease AFB and the subsequent disposal of the base be thoroughly documented and analyzed as early as possible, preferably during the preparation of the first EA/EIS. Since Pease AFB is proposed to be the first of the Air Force bases to be closed in the implementation of Public Law 100-526, we believe that it is imperative that the impacts on local communities be analyzed as soon as possible. This would provide the affected municipalities with critical information needed to plan operating and capital budgets and plan other actions to soften the short- and long-term negative effects which will result from the base closure.

Please contact either Bill Collins, Planning Director, or myself, if you have any inquiries concerning our evaluation comments.

Sincerely,

Bruce Woodruff
City Planner

BW/1cc

Attachment

Sincerely,

$f_{c,0} + g_{c,0}$

Paul H. Smith
Executive Director

cc: John D. Rittenhouse, Deputy for Facilities Management, Office of the Secretary of the Air Force, Washington, DC
David Glass, Regional Civil Engineer, HQ AFESC, Atlanta, GA
George C. Jones, Chairman, Pease AFB Redevelopment Commission
Donald M. Sumner, Chairman, SRPC; Chairman, Durham (NH) Town Council

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WILLIAM E. COLLINS, ACP
Director



284 Central Avenue
Dover, New Hampshire 03820
(603) 742-3351

Rev. 12-1-90

City of Dover, New Hampshire

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

MEMORANDUM

TO: Jeffrey W. Ott,
Environmental Clean-Up Advisory Member
Pease Air Base Redevelopment Commission

FROM: Bruce W. Woodruff, *(BW)*
City Planner

DATE: January 14, 1990

RE: Environmental Impact Statement (EIS) -
Closure of Pease AFB, NH

The Dover Planning and Community Development Department has reviewed the draft EIS for the closure of Pease Air Force Base, dated December 1989, as submitted by the Department of the Air Force.

The following is an itemized compilation of this Department's comments and suggested input regarding the EIS:

1. Page 1-2, Para 1.2

The description of the location of the closure action appears to be too narrowly defined if one is to assume that the subsequent statement topics attempt to address impacts upon the area triggered by the base closure. It is suggested that the location of closure action include wording that defines the entire metropolitan area that the base has been an integral and interacting part with. This impact statement should follow the established and widely accepted planning policy of studying the entire affected area; namely the Portsmouth-Dover-Rochester, NH - ME Metropolitan Statistical Area (MSA). Please refer to Figure 1, attached.

128 - The location of the closure action is not meant to be a discussion of the area affected by base closure. It is simply the identification of the base's actual location with regard to adjacent communities and the Great Bay. The socioeconomic impact area, presented in Section 3.13.1, page 3-29, of the DEIS includes Rockingham and Strafford Counties in New Hampshire and York County in Maine. The Portsmouth-Dover-Rochester, New Hampshire-Maryland Metropolitan Statistical Area is contained in these three counties.

2. Page 1-7, Para 1.4.2

Executive Order 12372 requires that Federal agencies consult with and solicit comments from local officials whose jurisdictions would be affected by Federal action. We find that the EIS does not provide a listing of affected local jurisdictions anywhere within the text of the EIS. There is no discussion evident that clarifies whether or not the City of Dover would be impacted or affected by the closing of Pease.

The Coastal Zone Management Act indicates that the primary responsibility for planning and regulation of land and water uses rests with the State and local governments. It is suggested the EIS list the local governments that are charged with this responsibility. That list should include all municipalities whose lands include the Coastal Zone around the Great Bay Estuary. It is our feeling that any environmental impact generated by base closure will affect all of Great Bay's Coastal Zones and not just those zones contained within the Portsmouth-Newington communities.

An AICUZ report was prepared for Pease in 1987 and was disseminated to local governments as a guide to implement land use regulation changes that followed recommendations for land development that was compatible with an adjacent military airfield. The land area specified for limited development has been identified as clear zones, APZ I zones, and APZ II zones. This report should account a history of the 1987 AICUZ report dissemination and community response to its receipt. The EIS should outline specific actions taken by each city and town that has AICUZ zones within their boundaries.

3. Page 2-1, Para 2.1

During the July to September 1990 time period, the 509 Munitions Maintenance Squadron will be inactivated. The EIS does not address the immediate, short-term effects on transportation (proposed munitions routing and schedule), bomb clear zones, and the environment regarding the Weapons Storage Area.

The final EIS should cover the final disposition of the 157th Air Refueling Group of the New Hampshire Air National Guard (NHANG). It is now known that some kind of airport use will be allowed, and that the 157th NHANG will not be forced to relocate to other facilities.

129 - Opportunities for local participation have been provided throughout the process used to develop this EIS. Under a Memorandum of Agreement (MOA) between the Air Force and the State of New Hampshire, the State Clearinghouse was informed by the Air Force of its intention to prepare an EIS; the clearinghouse notifies the state agencies and communities of this action. Public meeting meetings were held in the Pease area in February and April of 1989. Public meetings were held on the DEIS in January 1990. Through this process, comments have been solicited from state and local governments, special interests, and the general public. With specific regard to the City of Dover, the noise level from aircraft using Pease would be reduced somewhat as presented in Figure 4-3. Base closing in itself will not affect land use or water quality in the Great Bay estuary area. Therefore, a listing of local units of government with responsibility for the planning and regulation of land and water uses is not needed. Such a list may be a valid consideration for the reuse EIS.

130 - The Air Installation Compatible Use Zone (AICUZ) Program was developed by the Air Force to provide the communities surrounding a base with important information regarding noise levels and safety issues. An AICUZ report also includes recommendations for the types of land uses which are compatible in areas impacted by aircraft operations (see Section 3.17.1, pages 3-35 and 3-36 of the DEIS). An AICUZ report is specific to each base and is furnished to the adjacent communities who may be impacted by aircraft operations at that base. These are guidelines only, and it is the decision of the local communities, counties, or zoning boards/commissions to enact these guidelines into zoning ordinances. The preparation of the 1987 Pease AFB AICUZ report and its distribution were discussed in Section 3.17 of the DEIS. It is not within the scope of this EIS to discuss the community response to the 1987 AICUZ report, as this response bears no relationship to the closure of Pease AFB. The extent to which noise is considered in land use regulations in affected communities was presented in the last paragraph of Section 3.17.4, page 30-38 of the DEIS. The level of discussion contained in this report is sufficient for consideration of environmental impacts.

131 - As page 2-1 of the DEIS stated, the relocation of the 509th Munitions Maintenance Squadron has been addressed in a separate environmental impact document. Refer to response 34 also.

132 - The final disposition of the NHANG is an unknown and will be addressed in the reuse EIS.

4. Page 2-2. Para 2.2.1

What is the projected timetable for disposal of excess real property and related personal property after the inactivation of the 509 CSG on 1 April 1991? This report should also include factors that would effect the timetable projection.

5. Page 2-8. Para 2.2.4

This section states that the DOD OEA has initiated economic adjustment assistance "to communities located near Pease AFB". It further explains that economic adjustment "is a process by which organization, planning and resources are joined to maintain or restore community stability". The obvious question raised by this section is why will this assistance be required? This draft EIS does not even begin to address potential socio-economic impacts either in the area directly adjacent to Pease or in the metropolitan region. These projected socio-economic impacts must be included if only to explain why economic adjustment assistance is being actively considered by DOD.

It is equally important that a list of affected "communities located near Pease AFB" be included here. The authority tasked with identifying such communities and the rationale for inclusion in the list must also be addressed.

The draft EIS was not specific in defining what kind of economic adjustment assistance that the "area" would receive. The OEA coordination plan and the specific steps for assistance should be in the final version of this EIS.

6. Page 3-14. Para 3.5

The draft EIS quantifies air pollution sources and the percentage of emission types that account for each source. One potential source, however, is not included in the report. The present status and closure disposition of DOD's Waste-to-Energy Plant should be included. Particulate and gaseous emission figures should also be highlighted.

7. Page 3-18. Para 3.7.1

Figures should be provided to support the statement that water quality has reportedly been degraded in tributary rivers feeding Great Bay Estuary because of ongoing industrial and municipal discharges upstream from the base. Research should be included

133 - These comments are relevant to the reuse EIS and not to the closure EIS.

134 - The assistance is needed to reduce or mitigate potential adverse socioeconomic impacts. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS. A complete list of affected communities cannot be developed until the socioeconomic impacts are analyzed. Section 4.11, page 4-9, of the FEIS, has been expanded to include a discussion of the OEA coordination plan and the specific steps necessary for assistance.

135 - The City of Portsmouth's Waste-to-Energy Plant located on base property has not been in operation recently and is not a current source of emissions. The disposition of this facility will be addressed in the reuse EIS. Your comment about highlighting particulate and gaseous emission figures is not understood.

136 - Support for the statement can be found in the Roy F. Weston, 1987 reference listed on page R-2 of the FEIS. The New Hampshire Water Supply and Pollution Control Division did not comment that the statement was in error. Refer to response 364 also.

which breaks out municipalities involved, tributaries, source discharge locations, and water testing figures with locations.

8. Page 3-28, Para 3.13

This draft EIS should contain a comprehensive list of socio-economically affected communities. The report should have assessed a projected percentage of impact to those listed communities. It has been stated that the Air Force is working with the OEA to assist those communities expected to be hardest hit as a result of base closure. Who are those hardest hit? What agencies were responsible for deciding the hardest to be hit? What process or rationale was utilized in these decisions? The final EIS should contain this information in detail.

9. Page 3-29, Para 3.13.1

Why are the cities of Dover and Somersworth omitted from the Economic Impact Area Map (Figure 3.3)?

What is the projected time frame for the review, compilation and publishing of the Disposal (or second) EIS document?

Please include the specific steps that the Air Force is taking in "working closely with the OEA to minimize any negative effects of base closure".

10. Page 3.31, Para 3.13.3

The figures included in the population section are not in accord with the Dover Planning Department's figures (Dover Master Plan, 1988). Both the actual figures and projected statistics for population and annual growth rate are significantly lower than values held by this Department. The 1988 Dover Master Plan reports that the comparative percentage increase experienced by the City of Dover was 14% during the first seven (7) years of the 1980's. It is suggested that a source document be referenced with regard to statistics and projected figures.

11. Page 3-47, Para 3-19

The Transportation Section notes that I-95 has high volumes of commuter traffic and high volumes of weekend and holiday traffic during the summer. It is also noted that the Spaulding Turnpike has high commuter volume traffic. The report should note that the Spaulding Turnpike also supports high volumes of weekend and holiday summer traffic.

137 - Please see response 127. Neither a list of socioeconomic affected communities nor the extent of their impacts can be determined until the appropriate analysis is done in conjunction with the reuse EIS. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

138 - Figure 3.3, page 3-30 of the DEIS, did not depict all cities and towns in the economic impact area. To simplify the graphics, only a few of the area cities and towns were identified. The cities of Dover and Somersworth were both included in the three county economic impact area. Work on the reuse EIS is expected to begin this spring. For discussion of OEA's role, please see response 134 and Section 4.11, page 4-9, in the DEIS.

139 - Source documents are identified as appropriate.

It is suggested that the Final EIS include recent traffic volume statistics from count stations located on the Spaulding Turnpike and I-95. These traffic counts can be obtained from either NHDOT or the Rockingham and Strafford Regional Planning Commissions. Valid conclusions could then be drawn from the raw data to support statements made in the draft EIS.

There are five pertinent points regarding transportation that bear further investigation. They are:

1. The timetable for overpass construction at the Spaulding - Gosling intersection facility should be included in this report.
2. Seasons of the year other than the summer period should be closely looked at regarding heavy weekend and holiday traffic volumes on the Spaulding Turnpike. (i.e. the fall leave-watching phenomenon)
3. Specific traffic problem areas that must be addressed by this report are the Exit 6N/6W/Dover Point Toll Booth facility and the Gosling/Spaulding facility. Levels of Service, turn direction ratios, average daily traffic volume, and the number of available travel lanes on the General Sullivan Bridge should be quantified and included in the Final EIS.
4. The Draft EIS states that a major renovation of the base's railroad spur track would be required prior to any use. The report does not clarify whether or not this action is projected for the base closure process.
5. The State's third highest volume of daily traffic has been recorded by NHDOT between Rout 4 and the General Sullivan Bridge on the Spaulding Turnpike.

12. Page 4-2, Para 4.3

There is no mention in the Air Quality Resources section concerning the currently inactive waste-to-energy plant. The impact of the start-up or continuing inactivity of this facility should be addressed in the Final EIS.

140 - Section 3.19, page 3-48, of the FEIS has been expanded to discuss the high volumes of traffic on the Spaulding Turnpike and Interstate 95, and to present seasonal variations. Refer to response 83. The small reduction in traffic at these locations resulting from the closure of Pease AFB is an insignificant beneficial effect. The level of detail requested is not appropriate in light of the likely impact. These concerns are more appropriate for the reuse EIS in which potential increases in area traffic may have to be evaluated and impacts determined. The rail spur is considered in the report as an alternative method of transporting materials off-base as part of the closure. There are no plans to make the necessary renovations which would allow utilization of the spur.

141 - In 1980, the Air Force leased to the city of Portsmouth the property upon which the city built the waste-to-energy plant. In 1988, the building was leased back to the Air Force. Pursuant to this lease-back relationship, the city of Portsmouth is responsible for the cleanup and removal of any contaminants at the waste-to-energy facility as well as for the cleanup and removal of contaminants released from the facility into the environment. Currently, the Air Force has no information indicating that there have been releases of contaminants from the facility into the environment. However, the Air Force will conduct investigative activities to determine if the facility has released contaminants which require remedial action.

13. Page 4-9, Para 4.11

It is the strong feeling of the Dover Planning Department that:

1. Because of a number of variables involved in determining both base closure and subsequent reuse, short term negative economic and employment impact will occur in the Portsmouth-Dover-Rochester Metropolitan Statistical Area.
2. Any new employment opportunities of major import may be several years away.
3. Closure impacts on the housing market north of the base must be assessed for the interim period between closure and reuse.

Therefore, it is strongly suggested that major impacts from the base closure on employment, housing and the economy will occur during the interim period between base closure and reuse. An analysis of interim period impacts can be determined without benefit of reuse plans. This analysis must be included in this report for it to be utilized as a viable tool for mitigation against adverse impacts to the MSA.

A projected schedule for research, compilation and publication of the Re-use EIS should be included in this report. It is conceivable that Post-Pease Development may draw upon existing commercial and industrial uses in place to the North of the base. It is also probable that Dover and other northern sections in the MSA may bear the brunt of an intensified housing needs market in the Pease redevelopment atmosphere because of housing/land availability, housing cost, and relative accessibility to the new employment region. Access to a schedule for the Re-use document and an ability to actively participate in the preparation process will be a large step forward toward avoiding adverse impacts.

14. Page 4-10, Para 4.14

This section should include an analysis of the impact on the area in general and on resident retirees and dependants specifically. Simply announcing a facility termination action along with a supposition that facility users could be closer to alternative bases skirts the issue of ascertaining the effects of the action taken.

142 - Refer to responses 9 and 102a. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

143 - Refer to response 1.

144 - The analysis will include more detailed consideration of area residents. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

15. Page 4-11, Para 4.15

The Pease, AFB Golf Course represents a significant amount of land area adjacent to the base. The Draft EIS does not address the disposition of this recreational land use. Potential courses of action regarding the land and its present use may have differing types and varying degrees of economic and recreational service impact on the MSA. This specific recreational use should be addressed in detail because of the location and area of land involved.

145

145 - Section 3.16.1, page 3-34, of the FEIS has been expanded to include golf course use.

146 - Refer to response 129.

16. Page 5-2, Para 5.1.3

Local officials in cities such as Dover, Somersworth and Rochester, which are located in the MSA, were not contacted or asked to provide information during the preparation of the Draft EIS. It is suggested that these local governments be considered for participation in the preparation of the Final Closure EIS and in the preparation of the Re-use EIS.

146

If you have any questions or wish to discuss these comments further, please do not hesitate to call my office.

BMW/jcc

Attachments

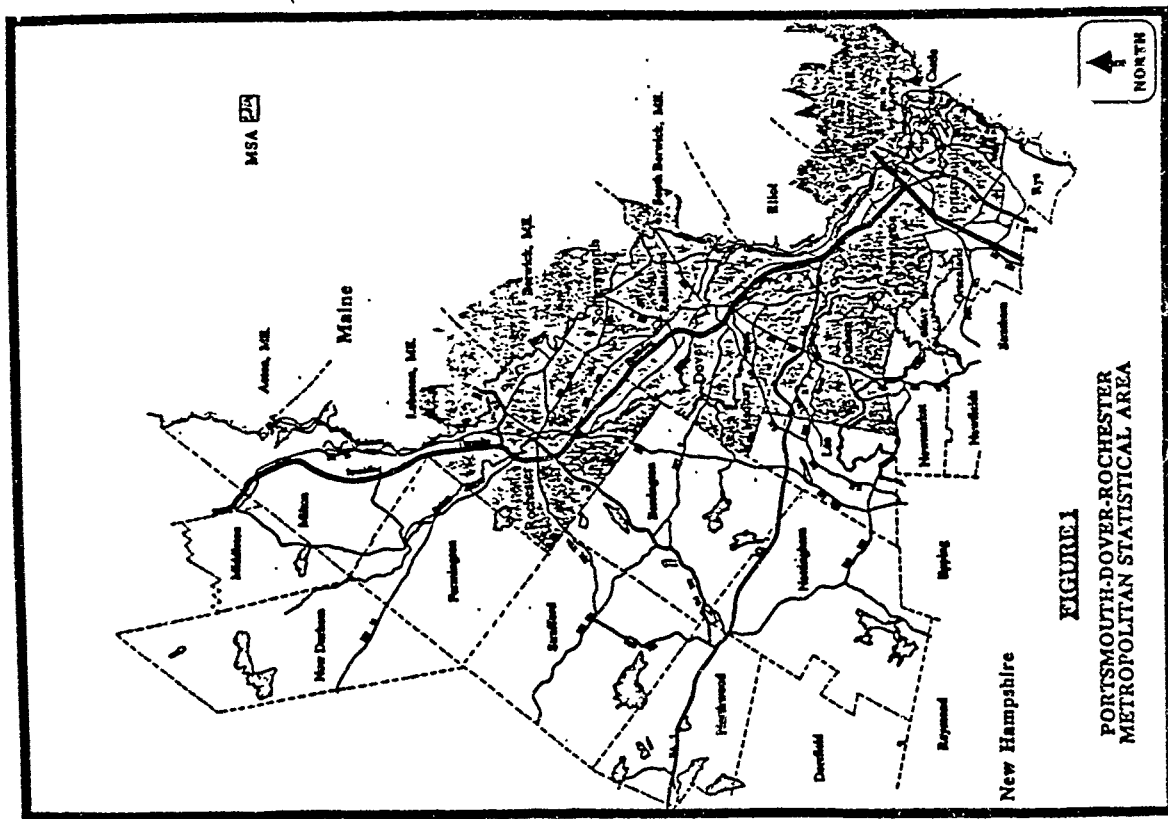


FIGURE 1
PORTSMOUTH-DOVER-ROCHESTER
METROPOLITAN STATISTICAL AREA

SSgt. Albert B. Manoukian
37 Sumac Drive
Pease AFB, N.H. 03801
January 17, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Dr. Hugh Stirts,

I, SSgt. Albert B. Manoukian 015-54-7584, am a resident of Portsmouth, N.H. and enlisted in the United States Air Force currently stationed at Pease Air Force Base in New Hampshire. I am an E-5 working with the 509th Supply Squadron as a fuel specialist, and would request your assistance with regard to the closure of this base and the property we own thereon.

I purchased a mobile home in the Pease AFB mobile home park in May, 1987. There are also fifty families who own these mobile homes in this park.

In December, 1988 we were informed that the government would be closing this base in approximately January, 1991.

Since that time, the housing office (the office who represents us) on the base informed us that the Army Corp. of Engineers would consider purchasing our mobile homes through the Housing Assistance Program offered by the U.S. government in cases when bases close to assist homeowners.

For twelve months now, the government keeps telling us they had not made a decision regarding this base and the Housing Assistance Program. However, recently the housing office was informed by the Army Corp. of Engineers that we would not be assisted by the program.

The fifty families on this base who own these mobile homes are responsible for paying their outstanding mortgages on their property. New England is a high cost area to live, and most mobile home owners owe an average of \$ 30,000. on their property.

Some homeowners have received orders and left their mobile homes vacant and we will be leaving soon also. Unless a decision is made, we will have to leave our mobile home vacant, but still be responsible to pay the mortgage and keep up the property upkeep. This will be a financial burden.

We feel that since the government opened up this park on this base for military families only, they should be in some way responsible in assisting us to sell them due to the base closure. We cannot sell them to the public since the park allows military families only and are not allowed to move them from this property. Furthermore, we were recently informed that all military personnel would be gone from this base by December, 1990.

How can they expect us to keep up on these mortgages without having the banks take them over and destroy our credit when the base will be closed, (including the mobile home park) and afford to live elsewhere. They do not seem to realize the financial and the future effects this will have on us.

We respectfully request your advice and assistance in this matter to help solve this matter regarding our mobile home.

If we can provide you with any further information, please feel free to call us at (603) 431-7165 or write us at 37 Sumac Drive, Pease AFB, N.H. 03801.

Sincerely,

Albert Manoukian

SSgt. Albert B. Manoukian

cc: President George Bush
Congressman Smith
Senator Humphrey
Senator Rudman
Governor Gregg
Mayor Foley

rm

147 - Refer to response 84.



State of New Hampshire
Fish and Game Department

2 Hazen Drive, Concord, NH 03301
(603) 271-3421

Donald A. Normandeau, Ph.D.
Executive Director

January 29, 1990

Hugh Stirte, Ph.D.
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Dr. Stirte:

The New Hampshire Fish and Game Department has reviewed the Draft Environmental Impact Statement for the closure of the Pease Air Force Base. The department is providing comments pursuant to the Fish and Wildlife Coordination Act (48 Stat. 401 as amended; 16 U.S.C. 661 et seq.), NH RSA 206:9 and 206:10, and as a cooperating agency under the National Environmental Policy Act.

The action being evaluated under the Draft EIS is the closure of the air base. This department assumes that the closure is defined as that period of time during and after the military departs the air base and before any other entity or entities takes over, uses or manages the land and facilities. Another separate EIS will be prepared for the final disposition of the base property. The Fish and Game Department will provide comments on that document at a later date.

The Fish and Game Department concurs with the statement on page S-2 that there will be insignificant losses to wildlife habitat from the closure action. However, during the closure period, hunting and fishing should be permitted. These two activities, if undertaken in conformance with state and federal laws and regulations, will not adversely impact the fish and wildlife populations of the base lands. To assure that these laws and regulations are enforced, the New Hampshire Fish and Game Department will continue its law enforcement activities on base lands during the closure period.

At present, the state has a Memorandum of Agreement with the Department of Defense which permits the use of base lands for education and research as part of the Great Bay National Estuarine Research Reserve. The Fish and Game Department recommends the MOA remain in effect through the period of the base closure.

Hugh Stirte, Ph.D.
page 2
January 29, 1990

If you have any questions please contact Ecologist William Ingham, Jr.
at (603) 271-2501.

Sincerely

Donald A. Normandeau, Ph.D.
Executive Director

DAN/WCI

cc: William Ingham, Jr.
Henry Hock
Gordon Beckett
John Nelson
Eric Orff

148 - Your understanding of closure is correct. Hunting and fishing will not be permitted during closure because such activities would require additional maintenance and security staff. The MOA of concern will remain in effect through the period of base closure.

Wild
Discover New Hampshire



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control
Atlanta GA 30333
February 2, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, New Hampshire 68113-5001

Dear Dr. Stirts:

We have completed our review of the Draft Environmental Impact Statement (DEIS) for the Closure of Pease Air Force Base, New Hampshire. We are responding on behalf of the U.S. Public Health Service.

Beneficial impacts of the proposed action include an overall reduction in the generation of air, water, soil, and noise pollution. Public health issues of concern and mitigation measures appear to be adequately addressed in this DEIS. We are concerned, however, about the existing contamination of soil and ground water, and emphasize the need to closely monitor planned mitigation events. We were pleased to note that the Air Force will maintain responsibility for investigation and remediation of all sites that have been contaminated or potentially contaminated by previous activities, and planned activities will be coordinated with State and Federal regulatory agencies.

Although planned remedial actions may not be considered as activities of closure (page 3-13), they are primary to the protection of health and safety of future users of this site and others who may be impacted by potential groundwater contamination. We commend the Air Force for their continued cleanup efforts as part of the Installation Restoration Plan. In particular, we believe the efforts planned for risk assessments should adequately identify the potential or actual routes of exposure and facilitate the implementation of necessary mitigation measures to ensure public health and safety. We encourage completion of these studies prior to allowing modifications to land use plans as a result of closure actions. We note that a second EIS will be prepared to cover the final disposition of Base property, including potential reuse, and we assume that risk assessment data will be a part of that document.

Thank you for the opportunity to review and comment on this DEIS. Please insure that we are included on your mailing list to receive a copy of the final document, and future DEIS's which may indicate potential public health impact and are developed under the National Environmental Policy Act (NEPA).

Sincerely yours,

Kenneth W. Holt

Kenneth W. Holt, M.S.E.H.
Environmental Health Scientist
Center for Environmental Health
and Injury Control

149 - Your emphasized IRP concern regarding the need to closely monitor planned mitigation for the existing contamination of soil and ground water is noted. Your concern regarding completion of IRP studies prior to allowing modification to land use will be addressed in the reuse EIS.

150 - The Department of Health and Human Services will be included on the mailing list to receive a copy of all NEPA documents regarding closure and reuse.



SOCIETY
FOR THE
PROTECTION
OF
NEW HAMPSHIRE
FORESTS
14 PORTSMOUTH STREET
CONCORD, N.H. 03301-1446
603/724-1943

February 2, 1990

Dr. Hugh Stirts
HQ SAC/DKV
Offutt AFB, NE 68113-5001

Dear Dr. Stirts:

The Society for the Protection of New Hampshire Forests is a private, non-profit membership organization which promotes the conservation and wise use of natural resources. We are the state's oldest and largest conservation organization and represent over 10,000 members throughout New Hampshire and New England.

We have reviewed the Draft Environmental Impact Statement and present the following comments:

3.4.1 Underground and Aboveground Tank Storage (page 3-3)

The locations of the tanks identified in this section should be disclosed, and should be located on a map of the base as appropriate. The map should be cross-referenced to Table 3.4.1-1 (page 3-4).

Why have some tanks been filled with sand or a caustic solution and some tanks left empty? More detail should be provided in this section.

Paragraph two of this section states "If the tanks are returned to service and the caustic solution is determined to be a hazardous waste, it would be appropriately disposed of." By whom and how? This statement should be clarified.

Paragraph five of this section states that projects to bring the tanks into compliance with federal and state regulations are underway. "All of these projects are planned for completion prior to the disposal of the installation; however, they are subject to availability of funds.... All work to bring the tanks into compliance with current regulations should be completed prior to property transfer and disposal regardless of funding considerations.

Page 3-4 describes the condition of the above-ground storage tanks, and states that Tank 2 "was found to have an inadequate water sump for removing water". How is the sump inadequate? This statement should be clarified.

151 - Refer to response 116. Tanks were filled with sand as a previous method of abandonment. Tanks filled with caustic solution were anticipated for reuse at a later date. Empty tanks are being reviewed for removal. The disposal of the caustic solution will be addressed in the reuse EIS. Every effort is being made to bring the tanks into compliance as soon as possible. Refer to the update of table 3.4.1-1 in the FEIS. The inadequate water sump has extensively deteriorated.

Dr. Hugh Stirts
February 2, 1990
Page Two

3.4.6 Installation Restoration Program (page 3-8 - 3-14)

On page 3-13 the report states "At the Fire Training Area 2, a maximum of 300 tons of drainage ditch soil contaminated with petroleum hydrocarbons will be excavated..." Why a maximum of 300 tons? Was this determined to be the maximum volume contaminated? Additional information should be provided regarding the proposed cleanup activities.

On page 3-14, paragraph five, the report refers to "specific wetland assessments" that will be conducted as part of the Installation Restoration Program activities. What will these wetland assessments involve? What areas will the assessments include? Additional information should be provided regarding the proposed wetland assessments.

3.7.1 Surface Water Features (page 3-18)

Paragraph three in this section refers to the water as "brecking". We assume the word intended was "brackish"; however, the proper terminology for waters in this system is "estuarine".

The same paragraph contains the statement "...food chains in these communities are potentially sensitive to manmade contaminants". Correctly stated, food chains are sensitive to manmade contaminants.

Paragraph five describes a series of "concentrate" check dams - the meaning of this term is unclear and should be clarified.

Page 3-20 of the report contains a description of water treatment to surface runoff prior to its discharge into McIntyre Brook. Is it true that only low flows are routed through an oil/water separator before entering the brook? What happens during periods of high flow? Is the separator by-passed resulting in potential pollution and violation of NPDES permit criteria? More information on this treatment system should be provided.

3.8.1 Plant Resources (page 3-22)

This section is inadequate in its description of plant resources found on Pease Air Force Base. The focus appears to be on commercially valuable timber species, yet the report fails to mention that a large portion of the base has been under a commercial timber management plan since 1971, and commercial timber harvests have occurred on the base. The cordwood thinning that is mentioned in this section has been conducted as part of a commercial timber stand improvement program.

No mention was made of any non-commercial plant species in the area. This section should be expanded to describe the wide variety of plants present on the base.

152 - Runoff from activities conducted at the Fire Training Area 2 caused concentrated and elevated levels of petroleum hydrocarbons in the soil in and adjacent to a drainage ditch at this site. Sampling was used to identify the area of contamination. The sampling results indicated that approximately 300 tons of soil require removal. For contract pricing purposes, an estimated quantity is used. If the quantity of soil removed is increased or decreased, a contract adjustment will be made. Wetland assessments will be conducted at specific IRP sites where wetlands may be impacted. The assessments will involve wetland delineation by vegetation, soils, and water regime. Wetlands that could be impacted by cleanup work will be protected in cooperation with appropriate regulatory agencies. Wetlands permits will be obtained when required.

153 - The word intended is brackish and is appropriately used. The adverb "potentially" was removed from the PIS. The word "concentrate" should have been "concrete." The piping system upstream of the oil/water separator is designed to direct low or normal flows into the separator. By design, a portion of high flows bypasses the separator. This is necessary to ensure that the separator is not flooded out during periods of high flows. This type of design is not uncommon for systems that service a large surface area easily affected by heavy runoff from rain or snow. The NPDES permit sampling location is downstream of both the oil/water separator and the high flow bypass point. Sampling requirements and permitted levels remain unchanged for both high flow and low flow conditions.

154 - Commercial timber harvests have occurred on-base in the past, as is implied in the text. The selective thinning does improve timber stands. The wide variety of plants on-base is implied by the discussion of the closure EIS is communities on-base. Further expansion of the discussion in the closure EIS is not warranted because impacts to plant resources will be insignificant. The discussion will be appropriately expanded in the reuse EIS. The Nature Conservancy is currently under contract with the Air Force to conduct an ecological inventory of Pease AFB for use in the reuse EIS. The inventory is scheduled for completion in July 1990.

Dr. Hugh Stirts
February 2, 1990
Page Three

3.8.2 Wetland Resources (page 3-22)

This section is inadequate in its assessment of wetland resources present on the base. The assessment should provide a detailed description of the variety of wetland resources in the area, including not only the saltmarsh and freshwater wetlands, but the freshwater ponds as well (the ponds are mentioned later in the fisheries section but should be included as a wetland resource).

On page 3-23 the report mentions that NOAA is proposing the designation of the Great Bay as a National Estuarine Research Reserve. The area was officially designated as the Great Bay National Estuarine Research Reserve in October, 1989.

3.9.1 Fishery Resources (page 3-23)

The first paragraph refers to "large mount bass", which should be "large mouth bass".

The third paragraph states that a fish ladder for the migration of fish "has been identified as a needed fish habitat improvement project". Where did this recommendation come from? This statement should be clarified.

More detail is needed in this section as a whole, as there is no mention of bay fishery resources or of the marsh and mudflat areas which support a wide variety of estuarine species.

3.9.2 Wildlife Resources (page 3-24)

This section is inadequate in its description of wildlife resources present on the base. The report focuses on game species, with no attention to non-game wildlife species. The habitat diversity available on the base property, which is substantial, should be addressed. Consideration should be given to the wild turkey, a traditional game species, as well as to non-game wildlife species such as coyote, beaver, fox, shorebirds, songbirds, and migratory and wintering waterfowl which have all been documented on the base property.

3.10 Endangered, Threatened, and Sensitive Species (page 3-24)

This section is inadequate in its assessment of endangered species in the area. Bird species not mentioned in the report that have been documented on the site include the common loon, Cooper's hawk, northern harrier, osprey, arctic tern, roseate tern, purple martin, and Henslow's sparrow. Three rare or endangered plant species have been discovered on the base to date: stout bulrush, exserted knotweed, and beach-heath. This information should be incorporated into the report.

155 - Closure of Pease APB will not impact wetland resources on the base. Therefore, further expansion of this discussion in the closure EIS is not warranted. The discussion will be appropriately expanded in the reuse EIS. The discussion of the proposed designation of the Great Bay as a National Estuarine Research Reserve has been updated in the EIS in Section 3.8.2 on page 3-23.

156 - The typographical error has been corrected. The source of the fish ladder recommendation is the Pease APB Conservation and Management Plan for Fish and Wildlife Resources. Further expansion of the discussion in the closure EIS is not warranted because impacts to fishery resources will be insignificant.

157 - There are many nongame species on base. Only nongame species of special concern, such as the upland sandpiper, warrant discussion. Habitat diversity is essentially addressed in the Plant and Wetland Resources section. Further expansion of the discussion in the closure EIS is not warranted because impacts to wildlife resources will be insignificant.

Dr. Hugh Stirts
February 2, 1990
Page Four

158 The New Hampshire Natural Heritage Inventory is in the process of inventorying rare, threatened or endangered plant and animal species on the base and will provide a report of their findings by June 1990. This survey should be mentioned in this section, and the findings incorporated into this section if timing of the FEIS permits.

3.12 Historic Resources (page 3-26)

159 Paragraph two mentions the original Newington town forest as being the first in the state, when in fact this was the first town forest in the country. Almost all of the forest that was acquired by the military remains forested and is managed by base personnel as part of the base timber management program. This section should be revised.

We appreciate the opportunity to provide our comments on this important document.

Sincerely,

Mary Ellen Boelhower

Mary Ellen Boelhower
Land Protection Specialist

158 - Only endangered, threatened, and sensitive species that are more than incidental visitors on the base and that are potentially affected by the base closure warrant discussion. The U.S. Fish and Wildlife Service reported during the scoping comment period that the bald eagle was the only federally listed species known to occur in the area. The Audubon Society of New Hampshire expressed concern in its scoping comment letter for only the upland sandpiper. The rare plant species being inventoried on base by the Nature Conservancy for the Air Force will be discussed in the reuse FIS. The plants will not be affected by closure activities. The inventory is mentioned in Section 3.10.

159 - Refer to response 99.

133 Fox Point Road
Newington, N.H. 03801
Feb 7, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Sir:

Thank you for the opportunity to express my views.

Coming from a family of landowners (dating back to the Piscataqua Pioneer days) opposing the initial installation of an air base and taking a great loss from eminent domain, later working at Pease and appreciating its military aspects, and now retired as a private citizen on several town committees, I wonder.

What happened to "We, the People?"

Newington is exceptionally fortunate to have both dedicated, knowledgeable and professionally-minded people on their boards. (I believe there are three Ph D's in related subjects!) Likewise Portsmouth. Naturally there are bound to be some disagreements, but agreements have been reached and any "in-fighting" as reported by the media is rather out of proportion.

From all my observations, Newington's Master Plan is a document worthy of continued study. To me it appears far superior to anything yet produced. Yet, to my utter dismay, in spite of all the hours of hard work and meetings, suddenly this has all been wiped out. The State is going to take over (if Bill #351 passes). Consequently, it will be people from all over New Hampshire, not to mention Bechtel connections, who will decide what is best for us -- and we will no longer have a say on our own land (only one vote in seven).

Pease began, and I'm afraid is now ending, with "politics," a fact I find dreadfully depressing.

Even the wildlife refuge which "everyone" (?) agrees on may be at stake. Some people do not realize that once this is gone, it is gone forever. And who knows the repercussions therefrom.

I could add an appendix of reasons, but ask for your support and consideration in preserving all of the wildlife refuge as outlined in Newington's Master Plan.

And heaven forbid a Massport:

I hope I have not wasted either your time or mine in writing.

Sincerely,

Dorothy M. Watson

Dorothy M. Watson

cc: Mr. George Jones,
Pease APB Redevelopment Commission

160 - The Newington Master Plan, wildlife refuge, and massport will be items discussed in the reuse EIS.

DEV-1 -
P-13
R-13
40 Sumac Drive
Pease AFB, NH 03801
February 5, 1990

Dr. Hugh M. Stirts
Environmental Management Headquarters SAC/DEV
Offutt AFB, Nebraska 68113-5001

Dear Dr. Stirts:

We are writing with regard to the closure of Pease Air Force Base in New Hampshire, the mobile home park located thereon and the environmental impact this closure will have on the mobile home owners.

We strongly request you consider the financial and future effects the closure of this base will have on the fifty (50) families who own mobile homes on this base. The cost of real estate and property in this state is outrageous. The price range that these mobile homes were purchased are in the \$40,000.00 to \$50,000.00 range.

We, as homeowners, are very concerned about the drastic financial devastation this will have on us since the Air Force and government are not doing anything to help solve this problem. We are seeking full market value for the sale of our mobile homes and would request that you include us in your Environmental Impact Statement since this will have a severe impact on our financial and future security.

If we can provide you with any further information with regard to this matter please feel free to contact us at the above address or telephone us at (603) 433-5895.

Thank you for your time and consideration regarding this matter.

Very truly yours,

James A. Eccles
James A. Eccles and

Karen E. Eccles
Karen E. Eccles



STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF PUBLIC HEALTH SERVICES

M. Mary Mongan
Commissioner

William T. Wallace, Jr., M.D., MPH
Director
Division of Public Health Services

Health & Welfare Bldg.
6 Hazen Drive
Concord, NH 03301-4627
Tel (603) 271

February 12, 1990

Mr. Hugh Stirts
HQ SAC/DEV
Offut AFB, NE 68113-5001

Dear Mr. Stirts:

The New Hampshire Division of Public Health Services (DPHS), has reviewed the "Draft Environmental Impact Statement for the Closure of Pease Air Force Base", dated December 1989. There are a number of health issues involved with site closure which are of ongoing interest to the DPHS. These include:

- 1) Of 156 underground storage tanks, 131 are between 11-33 years old. Potential soil and groundwater contamination and subsequent human exposure is of concern. (p. 3-3)
- 2) Potential human exposure resulting from the storage of hazardous wastes on barren soil is of concern. (p. 3-5).
- 3) Five sites are recommended for expedited remedial action. There are soils and groundwater known to be contaminated at these sites. DPHS is concerned with the potential for human exposure in association with contaminated environmental media at these sites.

Landfill 5 contains buried drums. Waste fuels, oils, and chlorinated solvents have been used at the fire training area. Petroleum hydrocarbons have been detected in soil east of Building 222. The Building 113 area has an underground storage tank formerly used for waste TCE. The Building 119 area has stained soil. MCLs have been exceeded in groundwater at all these areas. (p. 310). Again, DPHS is concerned about human exposure to these toxic substances.

162 - Your concerns are noted. Storage tanks are being brought into compliance with applicable Federal and State regulations. The hazardous wastes temporarily stored on barren soil are containerized. Human exposure to toxic substances is being addressed by the IRP.



153 [4) The report states that levels of TCE in the 3 main supply wells are declining. Of concern is the potential for levels to increase if the wells were to be pumped at full capacity. It is, a contaminant plume may be drawn into the wells. The presence of three wells supplying the City of Portsmouth, within one-half mile of the base, is also a concern. (p. 3-15)

154 [5) DPHS is concerned about the contamination of surface water resulting from drainage discharge to approximately 5 brooks in the area, and the potential for bioaccumulation of contaminants in the human food chain. (p. 3-19)

155 [6) On page 4-3 it is stated that any nonencapsulated friable asbestos discovered in base facilities will be removed on the assumption that any remaining asbestos will not be a significant health hazard. DPHS disagrees with this assumption in that it is not possible to project the extent of hazard presented by encapsulated asbestos without knowing what the future use or occupancy patterns of the buildings will be. Instead, DPHS recommends that all asbestos containing material be removed prior to the closure of the base. It should be noted that asbestos abatement in New Hampshire is regulated by both the Division of Public Health Services and the Department of Environmental Services. These agencies should be consulted prior to the initiation of asbestos abatement projects. Lastly, we request that a copy of the asbestos survey mentioned on page 4-3 be forwarded to us upon completion.

156 [7) The presence of lead paint in a number of buildings on-site may present a human health hazard depending on the condition of the paint and future site use.

157 [8) Regarding radioactive material on site, DPHS reminds Pease AFB that these materials must be disposed of in accordance with conditions of the Air Force's license which incorporates the Rules of the U.S. Nuclear Regulatory Commission (NRC) under which the license has been issued. Disposal, of course, may take many forms such as transfer to an authorized recipient (i.e. another licensee); transfer to another location under the same license (i.e. another air force base); return to the manufacturer or package and shipment to an authorized low-level radioactive material burial site.

In addition to the items noted in Section 3.4.4, DPHS is concerned about NARM sources which are not authorized for use by the NRC but are regulated by the State of New Hampshire. NARM stands for Naturally Occurring, Accelerator produced Radioactive Material and could be present in various forms such as paint on dials (radium), sealed sources in gauges, medical testing/treatment products, etc. Also, Pease AFB could possibly possess gauges or other devices containing small quantities of radioactive material, thought to be exempt.

163 - Operation of the three main base water supply wells at full capacity at some date in the future is relevant to the reuse EIS and not to the closure EIS. Contaminant plumes will continue to be studied in the IRP.

164 - Surface drainage from the base is in compliance with the base NPDES permit. 165 - The future use or occupancy pattern of base buildings containing encapsulated asbestos and asbestos that is currently non-friable will be addressed in the reuse EIS. Your recommendation regarding the removal of all asbestos is noted. However, there are no laws applicable to this Air Force closure base that specifically mandate the removal of asbestos in buildings, other than the law addressing asbestos in schools (Public Law 99-519). The detailed Air Force policy on management of asbestos at closing bases has been added to the text of the FEIS in Appendix G. A copy of the asbestos survey will be forwarded upon completion.

166 - The condition of the lead-based paint at the time of disposal will be addressed in the reuse EIS.

167 - Section 4.2 of the DEIS implied that radioactive materials will be disposed of in accordance with conditions of the Air Force license. Refer to response 29 also.

Mr. Stirts
Page Three

Again we note that radioactive material sources are only truly exempt if the manufacturer of these sources has been issued a license by the US NRC (or an Agreement State if the source is NARM) for distribution of the source device as exempt. In all other cases the source/device is not exempt and must be dealt with as radioactive material.

Therefore, DPHS requests a written inventory of all radioactive material sources, to include NARM, possessed by Pease AFB.

Due to the nature of the potential health threats outlined above, we wish to remain informed of developments related to waste site cleanup, asbestos abatement, and other issues that would relate to public health. Your assistance in this matter will be greatly appreciated.

Sincerely,

William T. Wallace, Jr.

William T. Wallace, Jr., M.D., M.P.H.
Director
N.H. Division of Public Health Services

WTW/daw/3900a

cc: Brook Dupee, DPHS
Diane Tefft, DPHS
Carl Baxter, DES/AMD

3900a

168 - The New Hampshire Division of Public Health Services is already one of the regulatory agencies with which the AF coordinates with on these issues.

CLF

Conservation Law Foundation of New England, Inc.

3 Joy Street
Boston, Massachusetts
02108-1477
(617) 432-2540
Fax (617) 523-9019

February 12, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Re: Draft Environmental Impact Statement for the
Closure of Pease Air Force Base

Dear Dr. Stirts:

I am writing to submit the following comments of the Conservation Law Foundation of New England ("CLF") on the draft environmental impact statement for the closure of Pease Air Force Base. As noted in the comments we submitted on the scope of this EIS, CLF is a non-profit public interest organization dedicated to improving resource management, environmental protection and public health throughout New England. Many of our members live in Newington or Portsmouth, New Hampshire, or in adjacent areas in New Hampshire, Massachusetts and Maine.

Although the environmental impacts of the closure and disposition of Pease AFB raise a number of important issues, we confine our comments to the failure of the closure EIS to address issues related to the hazardous waste sites at the base.

Description of Hazardous Waste Sites at Pease AFB

As the draft EIS mentions in passing, on July 14, 1989, the Environmental Protection Agency proposed adding Pease Air Force Base to the National Priorities or "Superfund" List. See 54 Fed. Reg. 29819, 29824 (1989). EPA's action was based on a Hazard Ranking System score for Pease of at least 28.5. *Id.* at 29822. EPA's notice in the Federal Register stated that the HRS score for the base placed Pease in the ninth group of at least 17 groups of 50 on the NPL. *Id.* at 29824. The proposed listing of Pease, and its rank above approximately one-half of the sites on the NPL, provides an indication of the "probability and magnitude of harm to the human population or sensitive environment from exposure to hazardous substances as a result of the contamination of ground water, surface water, or air." *Id.* at 29822.

The failure of the draft EIS to explain which sites warrant

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169 - Petroleum hydrocarbons (such as benzene, toluene, and xylene), volatile organic compounds (including tetrachloroethylene, trichloroethylene, and vinyl chloride), base neutral/acid extractables (including phenols, phthalates, naphthalene, and chrysene), pesticides (DDT, DDD, lindane, and chlordane), and metals (iron, lead, copper, zinc, and arsenic) were found at varying levels in soil, surface water, and ground water. Some of these contaminants have been detected at levels exceeding State and Federal standards. Pathways of concern include ingestion and skin contact with the contaminated soil and water. Appendix H has been added to the EIS to provide the locations and a brief description of the sites. Detailed discussions of the contaminants and their associated pathways at all of the sites can be found in the documents listed in Appendix H. The documents listed are available for public review in the Reading Room at Building 43 on-base.

the proposed listing of Pease on the NPL is less a defect by itself than an indication of the overall inadequacy of the description of hazardous waste sites at the base. See § 3.4. What contaminants are currently thought to be present at the Superfund sites, and in what suspected quantities? What pathways represent the greatest sources of concern? These are among the obvious questions that should be fully and clearly answered in the EIS.

The information provided in section 3.4 is not even superficially complete. For example, section 3.4.8 states that 20 sites were recommended for additional investigation in phase II, stage 2 of the Installation Restoration Program. The draft then dismisses 15 of the sites with the statement that "[r]esults of the investigation for 15 of the sites are currently being compiled and will be available in late 1989 or early 1990," and goes on to describe the five sites which were recommended for expedited remedial action. (Pages 3-9- 3-14.) A description of the first 15 sites needs to be provided.

Similarly, section 3.4.2 and Appendix B do not indicate what quantities of the hazardous substances have been stored at the various sites, nor do they even distinguish sites where substances are currently stored from sites where they have been stored sometime in the past, or specify where releases have occurred. Table 3.4.1-1 only serves to raise questions about the status of the dozens of underground storage tanks at the base. What actions are being taken with respect to which tanks, for what reasons, and in what sequence?

Also, the analysis which the Air Force has evidently conducted of the potential for increased contaminant migration to result from reductions in withdrawal of water should be described in much more detail. The issue warrants far more attention than it receives in the one paragraph devoted to it in the draft. (Page 4-3.)

Failure to Examine Potential Impacts of Closure on Hazardous Waste Clean-up Activities

An adequate description of conditions at the hazardous waste sites is necessary for the public to determine how closure of the base could affect pre-remedial and remedial work under the Comprehensive Environmental Response, Compensation and Liability Act. In the draft, the Air Force seeks to deflect the latter question by casually asserting that "all hazardous materials and hazardous wastes will be removed during closure of the base." (Page 4-3.) Yet the draft itself shows this statement to be untrue.

170 - Table 3.4.2-1 presented annual quantities of hazardous wastes generated at Pease AFB. Appendix B identified the type of hazardous waste and its recent past location of accumulation. The relationship of this information to the IRP sites is not the subject of this EIS. The actions being taken with respect to the underground storage tanks are to bring all tanks into compliance with applicable Federal and State regulations, as stated in Section 3.4.1 of the DEIS.

171 - A more detailed discussion has been provided in the FEIS in Section 4.4 on page 4-3. This potential for contaminant migration will also be discussed in the IRP documents.

172 - The IRP will continue to be an active program at Pease, even after closure, until all sites have been thoroughly investigated. Investigation results will be studied to determine locations where remedial actions (cleanups) are needed. Feasibility studies will be done to determine the most appropriate remedial action and then the remedial action will be carried out. When remedial actions are complete, the Air Force will monitor the sites as necessary to assure the effectiveness of the remedial action. In some cases, long-term monitoring for a number of years may be necessary. All of the work accomplished by the IRP will receive the same consideration for funding as an active installation. The discussion on pages 4-2 and 4-3 of the DEIS were in reference to the hazardous materials and wastes discussed in Sections 3.4.2 and 3.4.3.

As the draft and recent press accounts indicate, the closure process is outpacing the clean-up process. (See page 2-3; "Waste Issue Clouds Future of Pease," Boston Sunday Globe, Jan. 14, 1990.) While closure is scheduled to occur by June 1991, for even the five sites recommended for expedited remedial action, only the Remedial Action/Feasibility Study work is scheduled for completion by the same time. (Page 3-9.) Remedial Design/Remedial Action at the five sites will thus occur sometime after closure. (See also page 3-13 (pilot water treatment system not yet set up is to be operated for one year at four sites, with subsequent actions yet to be determined); page 4-3 (risk assessments to be performed for five sites as part of the Remedial Investigation/Feasibility Study will take three years).) Remedial Design/Remedial Action will presumably lag still further behind closure at the fifteen sites not recommended for expedited remedial action.

173

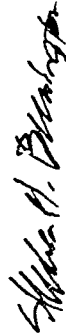
It is thus important for all possible impacts of closure on clean-up activities to be examined in the EIS. It is unclear what significance the Air Force attaches to its statement that interim removal measures at the five sites recommended for expedited action "are not considered as activities of closure; rather, they are continued activities of the Air Force's IRP." (Page 3-13.) It is clear that, with regard to all clean-up work at the base, the issues identified on page 2 of our scoping comments (copy enclosed) need to be addressed in a candid and deliberate manner. The draft fails to touch upon any of those issues.

The impacts of closure and disposition require far more careful examination than the draft EIS on closure indicates they are receiving. The propriety of segmenting the proposed action into "closure" and "disposition" is to begin with far from obvious. Although it is conceivable that adequate environmental review could be provided in two EISs, we emphasize the need to ensure that the documents collectively provide a full examination of all impacts of the course of action in which the Air Force is engaged. Unfortunately, the inadequacy of the discussion of hazardous waste issues in the closure EIS suggests that, by viewing parts of its course of action separately, the Air Force is concluding that neither part of that course of action has impacts which require detailed consideration.

174

Thank you for taking these comments into consideration.

Very truly yours,



Stephen H. Burrington
Staff Attorney

Enclosure

By Federal Express

173 - Refer to responses 96 and 204. The issues identified on page 2 of your scoping comments are addressed in responses 175 through 178.

174 - The closure EIS, reuse EIS, and IRP documents will collectively provide a full examination of all impacts of the courses of action in which the Air Force is engaged.

EPA under the Resource Conservation and Recovery Act. Id. As of the date of the last six-month update of the docket, the facility had not been removed from the docket.

Clean-up of these sites is a critical part of base closure and disposition activities. Section 120(h)(3) of the 1986 Superfund Amendments, 42 U.S.C. §9620(h)(3), requires deeds for transfer of federal properties to contain a covenant warranting that all remedial action has been taken prior to transfer and that any additional remedial action will be conducted by the federal government. CLF wishes to ensure that the EISs fully discuss all impacts associated with completion of remedial action prior to transfer.

In describing the existing environment in each EIS, the Air Force should provide a full description of all hazardous waste sites at the base, including DERP sites and sites on the Docket. The EIS should explain the current status of the assessment and clean-up efforts of the Air Force with respect to each of the sites, and summarize or incorporate previously-completed studies and remedial designs.

The EIS that will focus on the impacts of closure should include an analysis of the impacts of closure on the study, management and clean-up of the sites at the base. The Air Force should study the impacts of removing equipment and personnel on its ability to secure sites and conduct clean-up activities. The presence of equipment and personnel doubtless minimizes the risk that members of the public will be exposed to the sites pending clean-up. It also must facilitate, in various direct and indirect ways, the performance by the Air Force of its duties with regard to the sites. The Air Force should examine alternative ways of minimizing the risk of exposure to the public and of maintaining its ability to perform its duties, such as through different levels of continued staffing.

The first EIS should also explain any impact of closure on post-clean-up monitoring activities. If a lower level of monitoring than would otherwise occur will result from closure and the removal of Air Force personnel, the EIR should analyze all resulting impacts on public health and the environment. A combination of discontinued Air Force supervision and increased public access could, for example, result in a delay in detection of presently-unidentified sites, and in greater exposure to those sites by members of the public. Alternative monitoring arrangements should be examined.

The second EIS, covering disposition of the facility, should

175 - Cleanup of the sites is not a part of base closure but is important to base disposal and reuse. The Air Force will comply with the deed requirements of 42 USC 120(h)(3).

176 - This was a common scoping comment. A summary of the IRP was presented in the DEIS. To provide a "full description" of each site in this EIS would make the document unmanageable. However, detailed discussions of each hazardous waste site can be found in the documents listed in Appendix H. The documents listed in this appendix are available for public review in the Reading Room in Building 43 on-base. Locations and brief descriptions of the sites can also be found in Appendix H.

177 - Refer to response 172. The risk of public exposure to contaminants will be less during closure because human use of the base will significantly decrease.

178 - Minimizing the risk of public exposure to contaminants upon increased public access during reuse will be addressed in the revised EIS.



CITY OF PORTSMOUTH

Municipal Complex, P.O. Box 628
Portsmouth, New Hampshire 03801-0628
(603) 431-2000

February 12, 1990

Dr. Hugh Stirts
Headquarters SAC/Dev
Offutt Air Force Base 68113-501
Nebraska 68113-501

RE: Draft Environmental Impact Statement on the Pending
Closure of Pease Air Force Base-Portsmouth, New
Hampshire

Dr. Hugh Stirts

I am this date telefacsimiling and mailing to your attention the City of Portsmouth's comments on the above mentioned draft EIS. The City has serious concerns with the adequacy of this document. Many issues seemingly are either unaddressed or still in the process of being evaluated.

While the process that is being followed is involved, the City's major concern is that all significant and relevant issues should be evaluated in a timely fashion that will benefit the closure process and not place either undue or unwarranted costs on inappropriate parties.

My greatest concern is with the lack of a viable and current economic analysis of the effects upon the area caused by the Air Force's departure. The lack of data hamstrings the efforts of all who are attempting to grapple with both closure and reuse issues. These are not discrete functions; rather, they are interrelated. The ultimate success of both the Air Force's closure and the Reuse will depend largely on how these issues are handled today.

Other issues are commented upon as well. These range from lead and asbestos to the procedures which are being prepared to "evaluate risks."

I trust the U.S. Army Corps of Engineers will find these comments useful. If I, or any of my staff can be of further assistance, please contact myself or either Craig Wheeler or David Holden in the Planning Department.

Yours truly,

Calvin A. Canney
Calvin A. Canney, Portsmouth City Manager

179 - Your greatest concern, which is expanded upon in your subsequent comments, is noted.

Along with others, the Planning Department has reviewed the Draft Environmental Impact Statement (EIS). While this review is still ongoing, it has been sufficient to generate serious concerns. In its review the Planning Department and others have reached the conclusion that this draft is inadequate, and does not completely satisfy necessary statutory and procedural requirements. Specifically, the Draft (EIS) inadequately addresses issues that relate in one manner or another to the following:

National Environmental Policy Act (P.L. 91-190);

Executive Order 12372 - Intergovernmental Review of Federal Programs;

Resource Conservation and Recovery Act;

Comprehensive Environmental Response, Compensation and Liability Act;

Superfund Amendments and Reauthorization Act;

Clean Air Act; and, the

Safe Drinking Water Act.

Some specific concerns and comments are as follows:

1) In general, the tone of the draft EIS is inappropriately using the fact that the Base is closing as a means of avoiding the preparation of any detailed analysis of existing situations. While "no action" may not be an alternative that is available, neither should it be used as an excuse to not completely investigate areas of concern, especially socioeconomic concerns. The draft also implies that additional analysis will be forthcoming under the next EIS when there is data to compare. The problem with this timing is that the data is needed now. The decisions being made for the base's future should be based on an analysis of what the closure has meant to this area. The draft also seems to imply that the data exists and will be given only when there is other reuse data to compare it with. If it does indeed exist, then present the data so that it can be used in a more timely fashion and while it is still germane.

2) The draft EIS should, as part of its analysis, have been conducting an analysis and evaluation of the Inter Agency Agreement which only now is being coordinated with the Redevelopment Commission, the State, the U. S. Environmental Protection Agency, and the United States Air Force. This coordination, which to date has been lacking and is arguably behind schedule, properly should have been evaluated by this EIS pursuant to the National Environmental Policy Act and Executive Orders. Intergovernmental coordination should be in place now. Instead, at this stage of the closure, pieces are still being hastily arranged. (Page 2-8)

180 - The Air Force believes it has complied fully with the requirements of these laws and regulations. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS. Refer to response 9 and 102a.

181 - The interagency agreement is part of the IRP process, which is separate from the closure EIS process. Refer to response 204 also.

3) The draft EIS states on page 3-2: "The permeable sand and gravel deposits and the upper fractured zones of bedrock are the two principal receptors and migration pathways at sites where contamination is found." A map showing these sand and gravel deposits and fractured bedrock should have been included within the draft EIS. The overall documentation could be improved with the better use of graphic materials.

182

4) The draft EIS states on page 3-3 in regards to underground storage tanks that the objective "...is to bring the tanks into compliance with applicable Federal and State regulations...." The EIS then states that clean up projects are subject to "availability of funds". This is not an acceptable resolution to the issue. Who is responsible if there are no funds? What will be the potential problems if underground storage tanks that should be removed are not able for one reason or another to be removed? Whose responsibility is it to ensure proper removal if the local/state authority is unable to ensure their removal? Does this pose concerns regarding the reuse of this facility?

183

5) In reference to the bulk fuel storage area (pages 3-3 and 4), the condition of Tank 3 is suspect to the extent that it is recommended for demolition. However, the draft EIS allows for this tank to remain if it is braced. If it should be demolished, then the EIS should so require. The alternative action being allowed does not address the final disposition of this 5 million gallon storage tank and should not be an acceptable resolution to the existing condition of the tank.

184

6) The impact of the closure of Pease Air Force on lead paint in the housing on Pease was inadequately addressed in the EIS. In section 3.4.5 (p. 3-6), it is stated that the majority of the housing contains lead-based paint. The Air Force, in 1981, acknowledged the danger of lead based paint by their distribution of a health awareness letter regarding the prevention of ingestion of paint chips by children. In addition a policy of promptly repairing chipped surfaces was implemented.

In spite of this acknowledgement by the Air Force of the danger of lead based paint, in section 4.3 (page 4-3), it is stated that leaving these buildings vacant will not have any impact. However, the immediate impact will be felt by any members of the public who become tenants of these units, as they will receive no warning of the presence and danger of lead based paint.

185

182 - The suggested map is relevant to the INP and not to any impacts of closure. The presentation of such detail in the EIS is not warranted.

183 - Refer to response 181. It is anticipated that all tanks will be brought into compliance or removed, if necessary, prior to reuse of the base.

184 - The DEIS stated that Tank 3 will be demolished. The roof brack was to be required if demolition were delayed until 1990. Refer to response 23 also.

185 - The reuse of buildings containing lead-based paint will be addressed in the reuse EIS.

186 - The reuse of buildings containing asbestos will be addressed in the reuse EIS. Refer to response 165 also.

187 - The sludge stockpiled at the firing range did not contain cadmium. Refer to response 33.

In addition, if it is determined that a person has an elevated level of lead in his bloodstream as a result of living in these units, the City has a policy which requires that the lower four feet of lead paint in that unit be removed. This raises the question of who would be liable for the cost of the removal of the paint - another immediate impact.

7) Asbestos (3-7) Asbestos in PAFB Housing:

- A) Normally asbestos in sound addition does not pose a health problem. However, under actual living conditions, pipe insulation, if exposed, is subject to abuse and drainage possibly resulting in airborne asbestos fibers.
- B) Any repairs that may be required on piping insulated with asbestos i.e. taking pipes, may pose a serious problem as a plumber or other person may remove portions of asbestos insulation to get at the section needing repair and thus exposing himself and any family members present. If this situation arises, the asbestos should be removed by a qualified contractor certified by the State prior to repairs being made on the pipe or unit being repaired. During the period in questions, the family may have to be moved out during the asbestos removal period.

How and who will see that these concerns are properly addressed. The means for dealing with this issue should be established now. (P. 3-7.)

8) The draft EIS (pages 3-8) does not adequately address sludge disposal. Since 1987 sludge has been stockpiled at the firing range and at a former landfill that is itself an identified site in the Installation Restoration Program. This storage was done, in spite of the fact, that the sludge contains cadmium levels greater than that allowed for land disposal. The EIS states that disposal will conform, but it does not state who, when or how this will be done. The issue, therefore, still remains as does an apparent violation.

9) The Superfund Amendments and Reauthorization Act (p.3-9) evidently established a 3 phase study of waste sites.

- Phase I - Preliminary Assessment/Site Inspection
- Phase II - Remedial Investigation/Feasibility Study
- Phase III - Remedial Design/Remedial Action

Phase I identified 18 hazardous waste sites of which 16 went on to Phase II activities.

Phase II (which was completed in 1987) investigated these 16 sites plus 4 additional sites. Of these 20, 13 were recommended for Remedial Investigation. The ongoing Remedial Investigation phase investigated the 13 sites plus 7 additional sites. Of these 20 sites: data on 15 of them is not yet available and the remaining 5 have been recommended for "expedited remedial action".

This EIS, however, does not state:

- a) How sites were originally identified;
- b) How particular sites were eliminated;
- c) The process by which other sites were added;
- d) Nor does it address the 15 missing sites.

What conclusions can possibly be drawn from this draft EIS when complete data on 15 sites is not available?

10) In regards to one of the five identified sites the following comments are made.

1) Fire Training Area: "indications are that the bedrock may be a significant ground water flow unit. Arsenic, iron, manganese, TCE, etc. have been found in the ground water at concentrations exceeding EPA maximum contamination levels. Contaminant plumes have been detected, but because downgradient monitoring points are limited, the extent of the plumes... have not been determined."

2) Building 222 has evidenced contamination in excess of EPA standards for benzene, methylbenzene, xylenes, naphthalene, methylnaphthalene and petroleum hydrocarbons. The draft EIS states "further investigation is necessary".

Yet the draft EIS states that the Air Force's "interim removal measures are not considered as activities of closure; rather, they are continued activities of the Air Force's Installation Restoration Program. (P. 3-13.)

It is inconceivable that interim removal measures which "may meet the long-term cleanup goals for a site if a 'no further action' decision can be supported" are at the same time not being considered as activities of closure.

The EIS must address the whole range of activities as mandated by Federal/State statutes. If it does not, what confidence should we have concerning the cleanup of either these 5 sites or the other 15 sites where data is not even available today?

188 - Sites were originally identified by a thorough search of base records and interviews with past and present base personnel. Sites were eliminated from further study only when their presence no longer posed a risk to human health or the environment. For example, a spill site could be eliminated only when all the spilled material and all the contaminated soil associated with the spill were removed and remediated. Activities at Pease AFB were compared with similar activities at other installations which may have produced hazardous wastes. Other sites were then identified by field investigation. The remaining 15 sites are discussed in detail in a series of 13 extensive reports that are listed in Appendix H. The reports are available for public review in the Reading Room in Building 43 on-base. All future documents will be available for public review through the Administrative Record, which will be established pursuant to the Interagency Agreement. Ongoing investigations, conducted using State and Federal guidance in accordance with the Interagency Agreement, will establish the extent of contamination and the appropriate technologies to remediate the sites. The IRP actions and process are separate and distinct from the closure EIS actions and process. Refer to response 204. As soon as investigations have established the full nature and extent of the contamination and the appropriate remedial technologies, EPA and the New Hampshire Department of Environmental Services (NHDES) will oversee the Air Force's cleanup of the sites. The risk assessment is conducted as an integral part of the RI/FS. Procedures for conducting the risk assessment are established in Federal guidance and in the Interagency Agreement. The timeframe for completing the investigations and the ultimate remediation will also be established pursuant to the Interagency Agreement and will be reviewed and approved by EPA and NHDES.

11) Risk Assessment on these 5 hazardous sites is being proposed as a way of identifying "whether actual or potential harm to public health or welfare and the environment is posed". The draft EIS goes on to state that Risk Assessment is based on:

- a) contamination Assessment
- b) environmental fate and transportation assessment
- c) exposure assessment
- d) toxicity assessment
- e) risk characterization

Nowhere does the EIS delineate what the standards, procedures or methodology will be for determining what the risk assessment is for these 5 sites. What are the assumptions and who is preparing them? It also states that these actions will be done within 3 years. This time frame is a serious consideration both now and in a future reuse plan. Moreover, the EIS does not state what the time frame would be for the additional 15 sites which are not even mentioned or identified. (P. 3-14.)

12) The highest level of TCE contamination was found in the Haven Well. In 1985, TCE contamination levels on two occasions exceeded EPA standards. Overall there has been a declining trend in TCE concentrations which indicates, according to the draft EIS that the problem "has lessened by natural processes, cessation of the contributing source, or movement out of the area." Still, quoting from the EIS, "Three water supply wells for the City of Portsmouth are located approximately one-half mile southeast of the base. TCE has not been detected in these wells to date."

The draft EIS, however, does not address the long-term monitoring of the TCE plume not does it address what will happen if TCE contaminates the City's well fields. Clearly, this is a long term Air Force responsibility and should be subject to the Clean Water Act. This issue has not been properly addressed. (P. 3-17.)

13) The Air Force tested for lead levels in drinking water by testing "raw water sources". It would be more appropriate to test for lead levels at the tap within buildings, especially in structures which were constructed during the period of time when copper pipes and lead solder were being used. This issue has not been properly addressed. (P. 3-17.)

109 - Refer to response 172. Testing of lead levels at the tap within buildings at Pease AFB was initiated in February, 1990. Test results will not be available until May or June, 1990.

14) 'Economic adjustment' is described in the Draft EIS as being a process by which organizations, planning, and resources are joined to maintain or restore community stability. While the Air Force is taking full responsibility to determine the extent of the environmental issues, no such analysis is being done for the socioeconomic impact of the base closure. It seems incongruent for the Air Force to suggest that it will take responsibility for restoring stability to the communities surrounding VAFB when absolutely no efforts are being made by that same agency to determine the degree of the potential short term economic devastation. (P. 2-8.)

15) Air Installation Compatible Use Zone:

A good portion of the draft EIS has been devoted to AICUZ issues. Since AICUZ was developed by the Air Force for its bases and since, this closure deals with the cessation of Air Force activities, it is interesting to note this attention.

Is the Air Force AICUZ plan now being forwarded at this time as an element of closure or reuse? If it is for closure, it would appear to be unnecessary; if it is for reuse, then, it is not timely. The EIS should delineate the purpose for inclusion of the AICUZ plan and what effects it will have on existing residential uses that are located in the Clear Zone or in either Accident Potential Zone 1 or 2. (P. 3-35-43.)

16) Surface Water Resources - Wastewater Treatment Plant:

"A plan is under development which will forecast potential wastewater quality changes and recommend operational adjustment...to prevent any significant adverse impact to the Piscataqua River." These impacts would be caused by the decreased use of the plant.

The draft EIS, however, does not state who is responsible or when does that responsibility start or end. (P. 4-4.)

17) Base Security:

Draft EIS states, "Base security will continue to the level required to provide resource protection services for the installation. This security will prevent any vandalism of base property during this period. Upon attainment of standalone status, NHANG security forces will patrol the cantonment area."

When does the NHANG achieve standalone status? Who patrols after that date outside the cantonment area? What resources will be

190 - The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

191 - Refer to response 130 for discussion of aircraft. The environmental analysis in this EIS considers closure of Pease AFB. The noise analysis, including the discussion of the 1987 AICUZ plan considers only the impacts of base closure and the cumulative impacts of that action and the withdrawal of the FB-111 fighter bombers. The clear zone and APZ 1 and 2 zones are based on a specified width and distance from the end of the runway. The designation of the zones will not change and use will not be affected by closure.

192 - The Air Force will remain responsible for sewage treatment plant operations throughout the closure period.

193 - The NHANG plans to achieve stand-alone status on 1 April 1991. Base security will continue to be provided by the Air Force outside the cantonment area. USAF security personnel will provide resource protection services.

available to protect the base? This issue is not adequately addressed. (P. 4-8.)

18) Draft EIS states, "The commissary, base exchange, hospital, and like facilities will be closed and special access privileges for retirees terminated upon closure."

While the EIS marginally assesses the commissary and base exchange, there is inadequate information concerning health resources. This is a service which is affected by closure -- it has not been adequately addressed. Where and what are the alternatives and who is responsible? (P. 4-10 to 11.)

19) Throughout the draft EIS, levels of contamination should be given in relation to allowable state and federal standards. Without this information, the values listed in the EIS are less than meaningful to the lay person.

20) What are the long range plans for monitoring the movement of contamination plumes outside of the base after closure? It seems that there should be a contingency plan to assure those communities potentially affected by the myriad of contaminated sites that an ongoing environmental quality study will be done to protect the residents' health and safety.

21) Several studies were done to identify the existing conditions on the base. Some of the studies are adequately identified and some are not. For instance, the source of data is not always listed. There should be more consistency in data sources. Also, clean-up of sites is referred to throughout the EIS. How and by whom the clean-up will occur should be listed along with the source of funding.

22) The State Department of Transportation is anticipating the complete upgrading of the Goaling Road/Spaulding Turnpike intersection. This upgrade has been planned based on traffic generated from Pease AFB. The reuse of the AFB could have a significant impact on the adequacy of the new intersection to handle traffic.

194 - Military retirees and their dependents would be required to travel longer distances to receive the same services that they currently receive at Pease. Medical treatment will be available at other military facilities or under the CHAMPUS program at community hospitals.

195 - The levels of contamination at the IAP sites in relation to allowable state and federal standards can be found in the IAP documents listed in Appendix H, which are available for public review in the Reading Room in Building 43 on-base. As defined in CERCLA and the Interagency Agreement, the Pease NPL site includes the real property of the base and any areas off the base where contaminated ground water from the base may migrate. CERCLA and the Interagency Agreement require the Air Force to remediate all contamination from the site to protect both human health and the environment and to implement a State and federally approved Community Relations Plan to identify and address citizens' concerns in the surrounding communities. Your comment did not identify what specific lack of data sources were of concern. Much of the description of existing conditions on the base came from the Base Civil Engineering and Bioenvironmental Engineering Offices. Refer to response 96 also.

196 - The impact that base reuse may have on the proposed Goaling Road/Spaulding Turnpike intersection is not an issue of base closure and has not been considered in this document. It is an issue suitable for consideration in the reuse EIS.

23) Pg. 3-3 par #4 Who is investigating the site of the underground TCE storage tank? What action is anticipated if the site is deemed contaminated? What ongoing monitoring of a contaminated site is proposed?

24) Pg. 3-6, par #2 Who did the pesticide testing of the base water wells? When was it done and what were the results?

25) Pg. 3-6, Sec. 3.4.4 What do these radioactive levels mean?

26) Pg. 3-7, par #3 Who is doing the asbestos study to be completed in March, 1990?

27) Pg. 3-15, Sec. 3.6 What is the source of information?

28) An inadequate response was also given in the draft EIS to the question of the impact of base closure on both employment and government revenues. In these areas, the Air Force stated that the impact was unable to be determined at this time, and the public would have to wait for the reuse EIS to describe the impact of closure.

The immediate impact on employment in the area could at a minimum be measured in terms of the number of PAFB employees and their spouses who currently participate in the labor force, and the resulting impact of their departure on the businesses which employed them.

The closure of the base will also have immediate impacts on the City of Portsmouth. These impacts should be identified. For example, who is responsible for patrolling the area to prevent vandalism? Who will respond to a fire on the base? If the City has to bear these costs, it is an impact which should be accounted for in the EIS, not in the Reuse EIS.

In the Executive Summary (p. S-2), it is stated that "Chapter 4...assesses the impacts of the closure of the base (withdrawal of all units". Employment and government revenues will be immediately affected by the closure, and therefore the impact on these areas must be assessed in this draft EIS. The following Reuse EIS will assess the final disposition of the land and different impacts resulting from this disposition on employment and government revenues will have to be assessed.

197 - The TCE storage tank area is being evaluated by the Air Force under the IRP. The Base Environmental Engineering Office conducted the pesticide testing of the base water supply wells on occasion in the past, and no pesticides were detected. Radioactivity is the spontaneous emission of energy from the atomic nucleus of certain elements. The standard unit of radioactivity is the curie, which is defined as the number of disintegrations occurring in one gram of radium per second. The curie is a rather large unit, so fractions of this unit have found wide use. The millicurie is equal to one-thousandth of a curie. The Base Civil Engineering Office conducted the building survey for asbestos. The sources of information for Section 3.6 of the DEIS, in addition to the specific citation given in the section, are the two base offices identified above.

198 - The net impact to employment and government expenditures due to base closure and to base reuse cannot be estimated at this time. The number of military jobs and personnel transferred and the number of federal jobs lost to the area were presented in the subsections of Section 2.0, pages 2-2, 2-3, and 2-4, of the DEIS. The impact these losses, and the losses of spouses who currently participate in the labor force, will have on area businesses will be considered in conjunction with the reuse EIS. The Air Force's caretaker force will be responsible for patrolling the base to prevent vandalism and to provide fire protection on base prior to initiation of base reuse. The executive summary has been changed to clarify the inclusion of the socioeconomic analysis of base closure in the reuse EIS. As previously stated, the Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, pages 4-9. They are somewhat different from plans described in the draft closure EIS.

What are the economic implications that we face today - regardless of what eventual reuse plan is adopted?

29) By Whom, where and at whose expense will the caustic solution be disposed of? I am apprehensive about the mention of corrective actions mentioned on Pages 3.3 and 3.4 being dependent on availability of funds. It seems to me that the necessary funds must be made available and that it is the responsibility of the Air Force to furnish them.

This operation should be monitored by some agency other than the Air Force, perhaps NH DES or US EPA.

30) Pg. 3-13 ff. Why have future actions not been determined? It seems to me that there must be standard operating procedures in place, outlining actions to be taken dependent on what contaminants are present. Further, it seems that the five-year assessment period will make it very difficult to sell the idea of development in the area of these sites.

Where have the contaminants moved? This action should be monitored as suggested above, by an independent agency. These assessments over a three-year period, and the time needed not for any remedial action, are surely not going to enhance the chances for development in the immediate future. This action should be very closely monitored by such an agency as NH Audubon Society, NH Fish & Game Dept., or US Fish & Wildlife Service. This should ensure that there is no disturbance of this NH endangered species.

31) The "rapid economic growth" noted is now history; it may be some years before it resumes, and it should not be used in assessing economic impacts. Current trends are significantly different than the ones being used in the EIS. This dated material is not useful. (P. 4-8.)

32) Given the closure schedule for PAFB, it is important for interested parties to know the dates for the second Reuse EIS. For this document to be relevant, it should be made available as soon as possible. It should also be designed to address reuse needs that should be resolved in order for the former base to operate. If there is a significant lag time between military and non-military use of the base, fiscal, operational, and other issues should be evaluated and presented to responsible authorities.

199 - Refer to response 151. The tank projects are subject to the approval of the State of New Hampshire.

200 - Future actions cannot be determined until the current field investigation, associated risk assessment, and screening of remedial alternatives are completed and approved by EPA and NHDES. This review and approval process will ensure that the appropriate remedial actions will be implemented to clean up the existing contaminants. The Air Force is still conducting field investigations to define the direction and extent of contaminant migration. Both the EPA and NHDES will review and approve all investigations and remedial activities conducted pursuant to CERCLA and the U.S. Fish and Wildlife Service have input into the CERCLA process through the identification of their agencies' applicable regulations, such as State and Federal endangered species laws.

201 - Refer to response 77.

202 - Refer to response 1.

33) NEW HAMPSHIRE CODE OF ADMINISTRATIVE RULES

he-p 1805.03 Hazardous Levels of Lead Based Substances.

(a) When present in a dried film including paint, glaze or varnish on walls, woodwork, or other surfaces or articles, or in plaster, putty or other substance in a residential dwelling, a hazardous level of lead shall be deemed to be the following:

- 1) More than 0.5 percent lead by dry weight as measured by chemical analysis; or
- 2) More than 1.5 milligram lead per square centimeter of surface area as measured on site by mobile x-ray fluorescence (XRF) analyzer or comparable equipment.

b) Hazardous lead based substances requiring removal, replacement or covering.

- 1) All loose lead based paint or substances shall be removed and covered with lead free material or made intact by covering with 2 coats of lead free paint or varnish after necessary patching, sanding and priming.
- 2) All intact or loose lead based paint or substances on chewable surfaces shall be covered or removed to the base material up to four feet from the floor and four inches back from all chewable edges. These include surfaces such as window sills; door frames below four feet; stair rail spindles; stair tread from the lip to the riser on bottom and four inches back from the lip or the top of the tread; doors below the four foot level and four inches back from each edge; stair rails and porch railings; outside corners of adjoining walls. All lead based substances on window components which move against or impact upon another component shall be covered or removed to the base material. The surface shall then be covered with lead free material or 2 coats of lead free paint or varnish once lead hazards are removed.

Re: 12.3 Attached and Detailed Family Units

- 1) If any children up to six years of age live in these units they may be subjected to lead paint ingestion.
- 2) The housing would have to be inspected and measurements made to determine levels by mobile x-ray fluorescence (XRF) or comparable equipment. A hazardous level of lead shall be deemed to be the following:

- a) More than 0.5% lead by dry weight as measured by chemical analysis; or

- b) More than 1.5 milligrams of lead per square centimeter of surface area as measured on site by XRF.

It is estimated that lead paint remover in an average house will cost in the vicinity of \$1,700 - \$3,500. This is based on removals that have occurred in Portsmouth.

How and who will see that these concerns are properly addressed. The means for dealing with this issue should be established now.

CITY OF PORTSMOUTH
COMMENTS PREPARED BY

Members of the Portsmouth Planning Board
Members of the Portsmouth Conservation Commission
Calvin A. Canney, Portsmouth City Manager.
Craig Wheeler, Planning Director
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Portsmouth Health Officer

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211



February 13, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Dr. Stirts:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (DEIS) for the closure of Pease Air Force Base in New Hampshire.

Pease AFB is located in southeast New Hampshire near the city of Portsmouth and the town of Newington. In addition to supporting a major military installation, 300 acres of the Base adjoins the Great Bay, an important estuarine resource recently designated as a National Estuary Research Reserve. This portion of Pease is the largest single tract of land in the estuary and represents a long stretch of undeveloped shoreline. Further, in July, 1989, Pease AFB was proposed for addition to the National Priority List under the Comprehensive Environmental Response, Compensation, and Liability Act (Superfund), 42 U.S.C. Sec. 9601 et seq. because of the uncontrolled hazardous waste sites on base. As a result, the Air Force, EPA, and the state of New Hampshire have begun to negotiate necessary steps to restore these sites through a process under Superfund that coincides with, but is separate from the NEPA process accompanying closure and land reuse.

We understand from the DEIS and previous Air Force announcements that the Air Force intends to issue two EISs in relation to Pease: the first EIS, the subject of these comments, is to deal specifically with the closure action and related impacts only, while the second EIS will address the more complicated issue of land reuse once the base has closed.

In general, we believe that while the closure DEIS provides some useful description of the resources on base and their condition, the document does not fully describe alternative methods of closure and the direct, indirect, and cumulative impacts of closure. We are also concerned that the segmented approach to the analysis, which appears to essentially split secondary impacts (land reuse) apart from the original action (closure), limits the scope of review in this EIS such that many, if not most, of the issues of greatest public concern are being deferred to a later review. We thus believe that the Air Force needs to make more clear than it has thus far what decision(s) will be made on the basis of the closure EIS versus those that will result from the reuse EIS so that the public remains confident

that important opportunities to comment on issues of concern are not being lost in the shift from one EIS to another. Our detailed comments are as follows.

IRP/SUPERFUND/NEPA PROCESS

Given the high level of public interest in the clean up of hazardous wastes on site at Pease, we believe it would be helpful to clearly distinguish in the EIS between the installation Restoration Plan (IRP) process for clean up and the NEPA process for closure and reuse, particularly in terms of scope and timing, as well as how at times these processes may interconnect. While to a degree the processes share relevant, at times significant information, their independent purposes should be made clear to avoid confusion during the public review of the EISs for this action.

IMPACTS ANALYSIS

As discussed above, the segmented analysis makes it difficult to distinguish in this EIS between closure impacts (direct, indirect, and cumulative) and impacts from reuse to be addressed in the next EIS. In addition, a number of potential impacts that are specific to closure are not fully addressed in the document. Some examples are as follows.

Direct Impacts: The DEIS indicates (p. 4-1) that removal of deteriorated underground tanks will occur as part of the closure action; however the DEIS does not describe what this will entail or what environmental concerns, if any, exist as a result of their removal. In addition, the DEIS makes a number of references to the removal of hazardous materials and wastes in accordance with applicable regulations, though, again, provides no detail concerning the regulations themselves, who the responsible parties would be, or what environmental concerns may exist.

Regarding surface water resources (p. 4-4), the DEIS indicates that as a result of closure, a potential reduction in treatment efficiency of Pease's wastewater treatment plant may lead to water quality changes to the Piscataqua River. Though the document indicates that a plan to address this issue is under development, this issue must be fully addressed and submitted for public review before closure activities commence.

Finally, the DEIS indicates that several shipments involving hazardous materials and explosives will occur via truck transport to the interstate highway system as a result of closure. We believe more detail should be provided as to the types and quantities of materials to be shipped; the Federal, state, and local requirements involved; and what potential environmental concerns exist as a result of this transport of materials.

205 - Response 116 provides clarification.

206 - Table 3.4.1-1 of the DEIS provided the number of tanks to be removed. This table has been updated in the FEIS. Page 3-3 of the DEIS stated that the objective of the underground storage tank work is to bring the tanks into compliance with applicable Federal and state regulations. If any contamination is found at the tank removal sites, it will be addressed under the IRP. A detailed summary of the many regulations applicable to the removal of tanks, hazardous materials, and hazardous wastes would constitute an encyclopedic presentation, which the CEQ regulations discourage. The Air Force will be the responsible entity for the removal of those items it has committed to in the discussions in the EIS. The environmental concerns are those identified by the section headings in Chapter 4 of the EIS. Within the discussions under the Chapter 4 headings, indirect concerns for public health and safety are addressed.

207 - The plan which will forecast potential wastewater quality changes and recommend operational adjustments is still under development. The plan will be completed before closure is implemented, and copies will be forwarded to EPA and NHDES.

208 - All Federal, State, and local laws and regulations regarding the movement of explosives or toxic waste will be complied with. Necessary coordination with regulating agencies will take place. This compliance should ensure that there will be no environmental effects resulting from this activity other than those normally associated with truck transport.

Indirect impacts: We believe the EIS needs to clarify whether closure will in any way affect the study, management, clean-up, and monitoring of hazardous waste sites on base. This should include a discussion of how and by whom these activities will be conducted and monitored once the base has closed and most military personnel have left.

In addition, indirect impacts, not related to land reuse, that may potentially be of environmental concern should be more fully addressed in the EIS. For example, reports indicate that a nearby jet fuel tank farm, owned by the Air Force and supplying Pease, will close down as a result of closure. Because this tank farm has been cited as the cause of underground contamination, we believe the EIS should include a discussion of what will happen to this facility, who is responsible for its disposition, and what effect closure might have on efforts to restore the site.

ALTERNATIVES

While we understand that Congress has exempted the Air Force from the requirement to examine the no-action alternative in this EIS, the Air Force still has an obligation under NEPA to fully discuss alternative means of closure. This may include consideration of timing, space, method and/or route of transport, monitoring actions, and mitigation measures in comparative form. To the extent that important information is still unknown that would bear upon what alternative methods and related impacts may exist, the EIS should document that fact.

Regarding transportation of hazardous and other materials, for example, the DEIS indicates only that trucks were chosen because they are the cheapest form of transport, but does not analyze this or other alternatives from an ecological standpoint, including risks to public health.

Finally, regarding alternatives for future land reuse, we are concerned that references in the DEIS express a predisposition toward the future use of Pease AFB as a commercial airport, a decision that cannot be made until a full evaluation of alternatives has occurred in the reuse EIS. Given the strong public interest in this issue and the decision by the Air Force not to analyze it until the second EIS, we believe the closure EIS should not contain such references as these, when it has not considered other potential uses, and that the Air Force should not permit this predisposition to guide its evaluation of closure impacts (see, for example, p.2-3).

In addition, the document indicates that construction activities will occur at closure in anticipation of the base being used as a commercial airport (p. 3-1). The Air Force should explain how this decision was made in advance of the reuse EIS analysis that would determine whether this type of construction is needed.

209 - Refer to response 172.

210 - Refer to response 102b.

211 - Refer to first half of response 104. The concern regarding alternative methods of transportation is vague. U.S. Department of Transportation regulations will be followed. The comment is interpreted to be asking for a discussion of potential impacts from accidental spills during transport. Such a discussion would be speculative. In the event of an accidental spill, the closest capable entity would be asked to assist in containment and cleanup.

212 - The discussions of concern do not express a predisposition toward the future use of the base as a commercial airport. Rather, the discussions provide an explanation for not relocating the NHANG at this time. The several construction activities associated with the NHANG transition are necessary to ensure that the NHANG remains a functional entity.

213 - Refer to response 1. The EPA rating of the DEIS is noted.

4
As a final comment, it is not clear from the information provided whether the Air Force intends to conduct a separate scoping process for the reuse EIS. Given the increased availability of information relevant to the subject of land disposition, provided in particular by the closure EIS, and the magnitude of the environmental issues associated with the reuse of the base, a separate scoping process would be useful in our view. We therefore would appreciate any clarification you can provide on this point.

For the reasons detailed above, we are rating this DEIS "Environmental Concerns/Insufficient Information," in accordance with EPA's national rating system. A description of the rating system is enclosed.

Thank you for this opportunity to comment on the closure of Pease Air Force Base. Attached are additional technical comments. Please call me (ph. 617/565-3422) or Patience Whitten (ph. 617/565-3413) if you have any questions.

Sincerely,

Elizabeth Higgins Congram

Elizabeth Higgins Congram,
Assistant Director for Environmental Review
Office of Governmental Relations
and Environmental Review

TECHNICAL COMMENTS

GENERAL

In view of the fact that there have been a number of studies about resource contamination at Pease, we suggest that these studies be included in the EIS for our own reference when we review this and the upcoming reuse EIS.

WATER SUPPLY

1) Regarding off-site groundwater migration, the DEIS indicates that several water supply wells for the city of Portsmouth are 1/2 mile southeast of the base and that sampling has not indicated any signs of contamination. The DEIS does not, however, go into further detail as to whether these municipal wells could be adversely affected by off-site groundwater contamination as a result of past or present activities at Pease AFB.

Regardless of whether this issue may already have been or is being addressed by on-going studies conducted by the Air Force, off-site groundwater migration and its potential impact to public and/or private wells should nonetheless be documented more thoroughly than it now is in the DEIS.

2) Though it does not appear from the information provided that any surface water supply resources have been or could be adversely affected by the Pease facility, the DEIS should not rule out the possibility of municipal wells being located along affected tributaries into which surface runoff from the site is presently being discharged. Please identify whether any such tributaries exist and, if so, whether any municipal wells may be adversely affected by surface runoff being carried through these tributaries.

WATER QUALITY

1) Please indicate how the sediment contamination identified in the DEIS (p. 3-20) will be addressed. Also, please indicate whether this contamination contributes to the non-point source pollution load affecting Great Bay and, if so, to what extent.

2) Please indicate whether the wells referred to on p. 3-20 are causing any sediment accumulation upstream and, if so, how any resulting environmental concerns will be addressed.

214 - A list of the 13 IRP studies have been appended to the PEIS. See Appendix H. The Air Force is currently conducting field investigations to define the direction and extent of contaminant migration. Offsite ground water investigations are a part of that effort. Thorough documentation of all Air Force IRP activities to date can be found in the documents listed in Appendix H, which are at the CARE office.

215 - Pease AFB surface runoff flows into the tributaries identified in figure 3-2 of the DEIS. In December 1989, 17 residential wells, 1 spring, 1 industrial well, and 2 municipal wells located along these tributaries from the base to their confluences with the Little Bay, Great Bay, or Piscataqua River were tested for volatile organic chemicals by the base. Two samples were taken from each well and none were found to exceed the regulatory limits for volatile organic chemicals.

216 - Both Grafton and Newfields Ditches are IRP sites covered by the Interagency Agreement. As such, they will be thoroughly investigated and remediated using State and Federal standards. As these ditches do not flow to the Great Bay, it is not expected that Great Bay is affected by flow from these ditches. The extent of the contamination in the ditch sediments and any potential for migration of the contaminants will be determined in further site investigations. Wells have been installed on Flagstone and McIntyre Brooks for the purpose of controlling stream velocities and stream erosion. Sediments have not accumulated upstream from the weirs.

Massachusetts

- 1) Figure 1-1 (p. 3-11) indicates probable/confirmed groundwater flow direction as moving off base. Please indicate how the Air Force will address any off-base migration of contaminants.
- 2) Regarding interim removal actions (p. 3-13, 3rd para., last sentence), the Air Force makes an assumption that has not been agreed to by EPA and/or the state of New Hampshire. The statement suggests that the sites may be clean in a few years, which is unlikely in light of risk assessments and operation and maintenance. We recommend that this sentence be deleted.
- 3) Please indicate whether the Air Force will be conducting a study or survey to ensure that all munitions and/or radioactive materials are not left on base.

17

217 - Off-base migration of contaminants will be addressed by the IPR. The sentence recommended for deletion has been deleted in the FEIS. Page 4-2 of the DEIS discussed the disposition of radioactive sources. Refer to responses 29 and 34 also.

POLICY AND PROCEDURES

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

10--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.

11--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.

12--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.

13--Environmental Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient significance 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 potential 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 impacts 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 that are analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analysis, 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, analysis, or discussion 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 109 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.

*From EPA Manual 161C Policy and Procedures for the Review of Federal Actions Impacting the Environment.

COMMENT SHEET
CLOSURE OF PEASE AIR FORCE BASE
PUBLIC HEARING
JANUARY 17 & 18, 1990

8- Rev. 5 2090

Name: CHESTER A. ODIERNE
Address: 39 HOLMES COURT
PORTSMOUTH, NEW HAMPSHIRE 03801

Check the category to which you belong:
Landowner ☒ Business Person ☐ Other ☐

Check the participant category to which you belong:
Public ☐ Designated Representative ☐ Private Citizen ☒
Official ☐ Of Private Organization ☐

Check here if you wish to ask a question during the hearing. N/A

Check here if you wish to offer oral comments. N/A

Check here if you wish to submit a written statement. ☒

Check here if you wish to receive an EIS. ☒ draft ☐ final

Area of question or comment (please check all that apply):
Air Quality ☒ Public Services & Facilities ☒
Water Quality ☒ Health Hazards ☒
Biological Impacts ☒ Visual Impacts ☒
Geology/Soils ☒ Cultural Resources ☒
Land Use ☒ Other (Specify) ☒

Please turn in this sheet as requested by the hearing officer.
Written comments will be considered in preparation of the final EIS. You may use this sheet to submit written comments either in the space provided below, on the back, or in an attached statement. Written comments may also be submitted in a letter or other format, but regardless of format, comments must be submitted no later than 13 February 1990.

Please mail your comments to: Dr. Hugh Starks
HQ SAC/DEV
Offutt AFB, NE 68113-5001

COMMENTS: I believe the decision to close Pease Air Force Base is a national security mistake, due to its strategic location to Europe. Now that there is talk of closing military bases in Europe, it will lose its strategic value. I think the base should be kept in a state of military security for as long as necessary to clean up all hazardous waste sites not just until close on Jan. 91. The economic impact from redevelopment over

of Pease will be greatly impacted if the scattered waste sites are not, or unable to be cleaned up before closure time.

218 - The Base Realignment and Closure Commission considered the military value of the installation, cost savings, plans and requirements of the Air Force, and the properties and their uses in its recommendations to close Pease AFB. Closure will not affect the cleanup of hazardous waste sites. Refer to response 96 also.



New Hampshire Association of Conservation Commissions

64 Portsmouth Street, Concord, NH 03301 (803) 224-7887

Per 163-69

219 - Refer to response 96. If anything remains broken, such as the carbon portion of the water treatment plant, it will be taken into consideration during the sale of the property.

February 12, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offut AFB, NE 68113-5001

RE: Draft EIS, Pease AFB Closure

Dear Dr. Stirts:

In brief, my comments on the Draft EIS for Pease AFB are: please pick up after yourself and repair what is broken before leaving. I am concerned by statements such as:

p. 3-5, paragraph 3: "Corrective action ... is pending receipt of adequate funding ...";

p. 3-6, paragraph 2: "... chemical toxicants have never been detected ... testing is not required ...";

p. 3-17, paragraph 2: "... the carbon portion of the water treatment plant does not function properly; it was improperly designed ..."; and

p. 4-3, paragraph 2: "... lead based paint surfaces will not be removed ..."

One branch of the federal government should not leave a site in such a condition that another branch of the federal government will be directing subsequent owners to clean it up -- no doubt at their expense!

Thank you for the opportunity to express my views.

Sincerely yours,

Marjory M. Skope
Marjory M. Skope
Executive Director

MMS/m



The Town of Newington

New Hampshire

Incorporated 1784

February 12, 1990

OFFICE OF
SELECTMEN

Dr. Hugh Shiras
HQ SAC/DEV
Offutt AFB, NE 68113-5001

RE: EIS for Pease AFB

Dear Dr. Shiras:

On behalf of the Town of Newington, I am writing to inform you that we have reviewed the draft EIS for Pease. We wish to go on record as concurring with the response prepared by the Environmental Clean-up Committee and the Natural Resource Protection Committee of the Pease AFB Redevelopment Commission. Their reports, forwarded to you under separate cover, adequately address all of our concerns. We trust you will incorporate these concerns into your final draft of the EIS.

Thank you for your consideration.

Very truly yours,

Margaret F. Lamson

Margaret F. Lamson, Chairman
Newington Board of Selectmen

220 - Your concurrence with the Pease AFB Redevelopment Commission's comments are noted. The Commission's comments are addressed in this appendix beginning with response 237 and ending with response 406.

P-167-90



Audubon Society
of New Hampshire

3 Sisk Farm Road • P.O. Box 528-B • Concord, NH 03302-0516 • (603) 224-9909

February 13, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Dr. Stirts:

Thank you for the opportunity to comment on the Draft EIS for the closure of Pease AFB in Newington and Portsmouth, New Hampshire. We have some general policy concerns which we will present first, followed by specific comments indexed to section and page.

The Executive Summary of the DEIS states on page S-1 that "Chapter 3 presents the environmental conditions associated with the installation and its operations and will serve as the baseline against which the implementation impacts are judged." Chapter 3 thus is a key to analysis of not only the closure impacts (the subject of this DEIS), but also, presumably, the "final disposition" and "potential reuse" impacts (to be covered in a second EIS). This is a large responsibility for Chapter 3, upon which critical decisions regarding future policies will depend. This chapter must thoroughly and accurately describe the current situation in order that the changes brought about by closure and reuse may be rigorously assessed. Policy makers should be provided the best possible baseline information before committing hundreds of millions of dollars, and the future of communities and individuals, to a particular course of action. Our reading of Chapter 3 does not elicit confidence in the thoroughness and accuracy of the information presented.

We are disappointed by the meager level of knowledge demonstrated in the discussion of wildlife habitats (especially section 3.8), wildlife resources (section 3.9), and endangered and threatened species (section 3.10); please see our specific comments below, especially numbers 4 through 8. The authors of the DEIS do not display the depth of knowledge and understanding which we feel is necessary for preparing a "baseline" document. The baseline situation for wildlife and wildlife habitat at Pease AFB has not been presented adequately. We wonder about the baseline information presented for other categories.

We are extremely concerned about the presentation on hazardous wastes. For example, the DEIS does not clearly indicate to the average reader that Pease AFB is a "Super Fund" hazardous

221 - The "implementation impacts" referred to are base closure impacts. The reuse EIS will expand the scope of the baseline conditions to the detail required for identification of reuse impacts.

waste site. The presentation implies that the hazardous wastes on the Base should be of no concern to policy makers for future planning because the Air Force will quickly and thoroughly remove or otherwise deal with them. We believe this is a false impression; the DEIS itself is contradictory on the subject. The last two paragraphs on page 4-3, for instance, are strikingly at odds with one another. The first, in discussing possible contaminant migration in ground water following closure of two wells, concludes that "discontinuation of withdrawal of water from either or both of these wells is unlikely to have a significant effect on local ground water flow directions or velocities." However, the next paragraph acknowledges that estimates of the off-site migration hazard must await completion of on-site studies which are up to three years away. Meanwhile, the ground water is contaminated and pumping will stop long before the studies are complete.

The DEIS, we believe, fails to thoroughly address the contamination of the Pease site, which does not serve either the Air Force or future users of the site well in the long run. Without an accurate and complete baseline, the analysis on which plans for the future are based becomes suspect.

We are also concerned about the segmenting of the analysis into two environmental impact statements: "Closure" and then "final disposition...including potential reuse." NEPA regulations do not allow segmentation geographically. What is obviously a single project cannot be divided up and analyzed in sections; the true, full impact might in that way be masked. In the case of Pease, the segmentation is on a time line rather than a map, but we are concerned that important impacts may just as easily be missed, or masked, or dropped through the cracks, in this scheme as in any other segmented or disrupted analysis. The transformation of the Base from one use to another is most beneficially reviewed, we believe, as a whole. The future of the land, and the people affected by it, is too important to accept incomplete and poorly presented analysis, even if unintended.

Our more specific comments about the DEIS follow.

1. The statement in the Executive Summary (p. S-2) that "the withdrawal will involve insignificant losses of wildlife habitat" is somewhat misleading when the entire spectrum of wildlife species using base lands is considered. Different species require different habitats, and what is habitat loss for some species is habitat gain for others. The revegetation of disturbed areas constitutes a habitat change which will have positive impacts on some species and negative impacts on others. It would be more appropriate to say something to the effect of "the withdrawal action will result in insignificant loss of lands available as wildlife habitat. Some habitat changes will occur, which will

222 - Page 3-10 of the DEIS clearly explained the hazardous waste status of the base. Your opinion on what the hazardous waste presentation implies is noted. The discussion on page 4-3 of the DEIS is not contradictory; rather, it discusses a potential consequence using the best available information and then recognizes that better information will be developed in the future. Refer to response 96 also.

223 - The halting of operations and removal of equipment and personnel from the base is separate and distinct from the disposal and reuse of the base property. The reuse EIS will assess direct, indirect, and cumulative impacts of base reuse including those that are short term in nature. The short-term impacts would include those impacts between base closure and ultimate reuse of the base. This should prevent any impacts from "dropping through the cracks." Refer to response 1 also.

224 - The Executive Summary has been expanded on page 8-2 in the FEIS to address your concerns.

produce an increase in habitat for some species and a decrease for others." Changes in mowing regimes, decrease in human activity on many areas of the base, and cessation of the firewood cutting program and hunting activity will all affect wildlife on the base.

Indicating the Newington/Portsmouth town line on the Installation Map (Figure 1-3, p. 1-5) would be helpful to the reader.

The Endangered Species Conservation Act (ESA 212A) provides the legal basis for protection of threatened and endangered wildlife in New Hampshire. The Native Plant Protection Act (NSA 217A) provides comparable protection for plants. These state laws, as well as their attendant regulations, should be referenced in Section 1.4.5 on p. 1-10.

In the Plant Resources Section (3.8.1 on p. 3-22), we suggest including mention of the wildlife habitat value of the existing diversity of forest types and open lands. A map showing locations of forest stands (white pine, red maple, red oak, mixed), old field, abandoned field, grassland, and wetland would be very useful in illustrating this section. Such a map is included in the Analysis of Major Habitat Types and Associated Wildlife Groups Found at Pease AFB, NH, prepared by the U.S. Fish and Wildlife Service at the request of the Pease Air Force Base Redevelopment Commission.

The Wetland Resources section as well needs to recognize the wildlife habitat value of the wetlands on Pease. The major wetlands, both brackish and freshwater, should be described briefly. We strongly recommend inclusion of a wetlands map of the Base in the final FIS. Such a map could be easily prepared from the National Wetlands Inventory map of the area.

In Section 3.9 (p. 3-23), hiking and camping do not constitute uses of fish and wildlife resources, although the presence of fish and wildlife certainly enhance these experiences for many people. Hiking and camping would be more appropriately discussed as uses of forest resources. Alternatively, it would be appropriate to state: "...many people also enjoy birdwatching, nature study and photography, and observation of wildlife while hiking and camping."

The Wildlife Resources Section (3.9.2, p. 3-24) only addresses game species. Since nongame species comprise the vast majority of wildlife species expected to occur on Pease, this section is an inadequate treatment of the designated topic. Either this section should be expanded to

225 - The Newington/Portsmouth town line is not relevant to Federal property and the closure of the base. Section 1.4.6 implied the referenced State statutes and attendant regulations were relevant and taken into consideration. The purpose of Section 1.4 is to provide a general listing as opposed to a detailed encyclopedic listing.

226 - Refer to responses 154 and 155. The referenced U.S. Fish and Wildlife Service report will be appropriately used in the preparation of the reuse FIS.

227 - Your suggested rewording was used in the FEIS. See Section 3.9, page 3-23

include discussion of nongame wildlife, or this section should be entitled "Game Resources" and a section on "Nongame Resources" should be added. In either event, deer, gray squirrels, cottontail rabbit, woodcock, et al. should be identified as important game species. Their relative "importance" as a wildlife species in general is an extremely subjective issue.

In Section 3.10 (p. 3-25) it would be worth noting that field studies during the summer of 1989 documented the previously unrecognized importance of the grassland habitat on the Pease airfield to the regional upland sandpiper population during the post-breeding migration period. The breeding population at this site was estimated at 7 pairs in 1989, and produced an estimated 10 fledged young. Migrants began to swell this population by mid-July and were present until late August. Surveys documented consistent counts of 30 - 60 sandpipers during 13 July - 22 August.

In Section 3.18.5, we recommend acknowledging the assistance of state and federal wildlife biologists in dealing with bird hazards.

The discussion of environmental consequence (Section 4) should address potential impacts of reduced mowing (p. 4-5) on wildlife. The location of grasslands scheduled for destruction (p. 4-5) relative to upland sandpiper breeding and foraging areas also should be addressed.

Section 4.7 (p. 4-5) should be handled as discussed in #7 above. Potential impacts on nongame wildlife need to be addressed.

Because upland sandpipers arrive at Pease before May 1 and remain in significant numbers through most of August (see #8 above), we request that construction be scheduled prior to April 1 or after September 1 (Section 4.8, p. 4-7).

The N.H. Fish & Game Department is not included in the list of state agencies contacted for information during preparation of the DEIS (Section 5.1.2, p. 5-1). If they were contacted, they should be listed. If not, they certainly should be contacted before preparation of the final EIS.

Section 3.10 (pp 3-24, 3-24) directly quotes information provided in correspondence of March 10, 1989 from D. Dickinson Henry, Jr. of Audubon Society of New Hampshire. There is no mention of personal communication with ASNH in the references listed on p. R1. We would appreciate correction of this omission. The upland sandpiper

228 - Refer to response 157. The specific use of the term "game" is not considered necessary. The species featured for analysis in this section of the DEIS are the same species that are featured in the Pease AFB Conservation and Management Plan for Fish and Wildlife Resources. Your comments about the upland sandpiper have been incorporated into the DEIS in Section 3.10 on page 3-26. The Air Force appreciates the upland sandpiper survey work that the Audubon Society of New Hampshire has conducted on Pease AFB.

229 - This assistance has been noted in the text of the DEIS in Section 3.18.5, page 3-47.

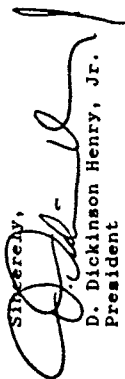
230 - Impacts of reduced mowing on wildlife were discussed on page 4-6 of the DEIS. The several grassed areas that will be destroyed are located more than one-half mile from the sandpiper habitat. The NHAAG has determined that it can accommodate your request that construction of the perimeter fence in the grassland strip between the runway and apron be scheduled prior to April 1 or after September 1. Section 4.8, page 4-7 of the DEIS has been revised to reflect this change. Refer to response 157 also.

231 - The New Hampshire Fish and Game Department has reviewed the DEIS. Its concerns were addressed in response 148. The 10 March 1989 scoping letter from the Audubon Society was inadvertently not referenced. This omission has been corrected on pages 3-25 and R-1 in the DEIS.

information presented in the above comments may be cited as follows:

Overtree, L., D. Evans, and C.R. Foss. 1989 Upland Sandpiper Project Final Report. Audubon Society of New Hampshire, unpubl. report.

Thank you for your consideration of these comments. We hope you will find them helpful in preparing the final EIS.

Sincerely,

D. Dickinson Henry, Jr.
President

RDH/vgk



U S Department
of Transportation
Federal Aviation
Administration

New England Region

12 New England Executive Dir.
Bureau of Transportation Operations

R/ 2371690

FEB 14 1990

Dr. Hugh Skirts
HQ SAC/DEV
Offut AFB, Nebraska 68113-5001

Dear Dr. Skirts:

The following comments on the Environmental Impact Statement (EIS) for Evaluation of the Impacts of the Closure of Pease Air Force Base are based upon Federal Aviation Administration's (FAA) interest in the potential reuse of the airfield for a commercial airport and our support of a significant portion of the comprehensive planning effort currently underway for the base's reuse.

A major criticism of this EIS is the omission of an assessment of the impact of the closure of the Air Force Radar Approach Control Service, Chapter 3 does in fact identify air traffic safety concerns regarding the operation of military aircraft in a heavily travelled Visual Flight Rule (VFR) corridor. The availability of radar surveillance is a valuable service in advising pilots transitioning from conditions of limited visibility of the location of aircraft operating by visual flight rules. While the FAA will takeover the airspace, the FAA's current equipment cannot provide reliable radar coverage below 4,000 ft. Mean Sea Level (MSL) in the vicinity of Pease. Consequently, radar advisories will not be available to pilots during the final approach phase of their flight.

Under non-radar separation standards, there are overlapping areas of protected airspace between Pease and the adjacent satellite airports (Littlebrook, Skyhaven, and Sanford). There will be possible delays to Instrument Flight Rule (IFR) users of these facilities. The appropriate offices within the Department of Defense should consider whether these would be tolerable delays, especially for mission departures. Military missions often use altitude reservations of airspace which, again under non-radar control, would create lengthy delays to IFR traffic operating at the satellite airports as well as to Pease itself.

The FAA has received letters of concern from the Littlebrook Airport, the State of Maine, and the Air Transport Association, regarding this change in service (copies enclosed).

An additional impact from the closure of the military approach control will be the loss of the precision approach radar (PAR) serving Runway 16. This is the only type of precision approach guidance available to this runway. The FAA does not operate PAR approaches. The conventional precision approach system is an Instrument Landing System (ILS). The Air Force has concluded that the cost of a glide slope installation as part of an ILS is prohibitively expensive for this runway because of terrain problems.

232 - Following receipt of this comment, the Air Force consulted with the FAA regarding potential safety impacts due to closure of the RAPCON facility at Pease AFB. It was determined that the circumstances in the area justified the continued provision of radar approach and air traffic control at Pease AFB. With continued operation of this facility after closure, the impacts presented in your comment will not occur. Refer to response 95.

233 - The precision approach radar (PAR) serving runway 16 will be discontinued as part of the base closure. This will affect aircraft using Pease AFB. It will not have a significant effect on area aircraft operation or safety. Your comments regarding the instrument landing system (ILS) and the date for improving the FAA antenna system are noted.

The FAA will not be able to make improvements to its system of radar antenna to compensate for this facility's closure until 1994. The FAA is studying this issue with the appropriate offices within the Air Force and Air National Guard in order to seek an acceptable solution for mitigating the impact of this closure on the airspace users.

Other Comments:

234 The description on page 3-43, "Air Space Management", confuses the activities of the air traffic control tower and the radar approach control service.

235 On page 3-21, reference is made to an archeological survey which will be performed as part of the reuse EIS. This information should be made available at the earliest possible time in order to guide the comprehensive planning being performed by the Pease Redevelopment Commission.

236 On page 4-7, section 4.8, the FAA objects to the inclusion of the statement that the two endangered species (the bald eagle and the upland sandpiper) "should benefit from reduced noise stress when aircraft use of the base is reduced." The previous page states that there is no conclusive evidence on the impact of aircraft noise on wildlife. The fact that endangered species are currently flourishing in a location with a very high level of noise from military aircraft would indicate that this is not a critical condition for their survival, and no implication should be supported that future increases in aviation related noise would threaten these species.

Please forward a copy of the final EIS when completed. We are also interested in the schedule and scoping of the reuse EIS.

Sincerely,

John C. Silva
John C. Silva
Environmental Program Manager

Enclosure

cc: Pease Redevelopment Commission
New Hampshire Dept. of Transportation/Division of Aeronautics
James Mottley, FAA, APP-400
Lt. Colonel Kim Bennett, USAF Representative

234 - The text has been corrected to eliminate confusion regarding these two separate activities. The changes are in Section 3.18.3, page 3-45, of the FEIS.

235 - This information will be made available to the appropriate entities at the earliest possible time.

236 - Your objection is noted. The previous page stated that the effect of noise on wildlife has not been extensively studied. The fact is that one population of an endangered species is currently inhabiting a location with a high level of noise. This may indicate that the noise level is not a critical condition for its survival, but a long-term study would be needed to draw any firm conclusion.

LITTLEBROOK AIRPARK

ELIOT, MAINE 03903

207-439-4922

August 3, 1989

Ms. Arlene Feldman
Administrator, New England Region, FAA
12 New England Executive Park
Burlington, Massachusetts 01803

Dear Ms. Feldman:

Currently, Pease Air Force Base located in Portsmouth, New Hampshire, is scheduled to close, and the runway will then be opened to civilian traffic.

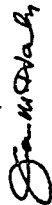
Aircraft flying in the New Hampshire, Southern Maine, seacoast area have used the services of Pease Approach for many years, and with the closure of this base, there has been some discussions of Manchester Approach taking over the Pease Approach airspace. Also, there has been some discussion of the Air Force removing the Pease VOR, since it does not want the responsibility of maintaining this piece of navigational equipment.

My husband and I own and operate an airport (private airport, public use), which is 4.9 nm to the northeast of Pease Air Force Base. Currently, we have three instrument approaches to our airport, due to the support from Pease Approach. If the Pease VOR is removed, and the approach control facility at Pease also removed, we will lose our VOR approach, and ASR approach. The NDB approach would remain, but our airport will become inaccessible to aircraft in low weather conditions.

As a flight instructor with over 4,600 hours, most of which have been logged in the seacoast area, I am concerned about the possibility of a mid-air collision if the radar facility at Pease is closed. Manchester approach cannot handle the traffic it currently has in its airspace, and with the additional burden of increased airspace, a mid-air will happen in the seacoast area.

If you have any questions, please feel free to call, or write.

Sincerely,



Jean M. Hardy

THE BUSIEST NEW HAMPSHIRE AIRPORT IN MAINE

Air Transport Association **ata** OF AMERICA

Eastern Regional Office
181 South Franklin Avenue
Room 801
Valley Stream, New York 11581-1190
Phone (516) 791-3444
(718) 656-4777
Fax (516) 791-3484

January 26, 1990

Mr. Ralph M. Nicosia-Rusin
Planning and Programs Branch, ANE-610
Federal Aviation Administration
12 New England Executive Park
Burlington, MA 01803

SUBJECT: Radar Service at Pease

Dear Ralph:

Reference is made to your inquiry pertaining to air carrier need for radar service at Pease upon closing of the base.

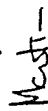
We understand that the Air Force plans to deactivate its radar approach control at Pease AFB on January 1, 1991.

Although the Air Transport Association is not aware of any firm plans by any of our member airlines to start serving Pease Airport upon its transfer to civilian control, a few carriers have indicated that they are indeed evaluating Pease's utility for air carrier or air cargo service.

Since Pease could potentially be used by air carriers, we would like to be on record requesting that the present radar approach control service be continued until the FAA can provide this service.

Thank you.

Sincerely,



Martin Keller
Assistant Director

cc: J. R. Ryan

JAN 31 1990

STATE OF MAINE
DEPARTMENT OF TRANSPORTATION

TRANSPORTATION BUILDING
STATE HOUSE STATION 10 AUGUSTA MAINE 04333-0016

DATA F COM-403

Communication

January 4, 1990

Mr. Ralph Nicosia-Rusin, Airport Planner
Federal Aviation Administration
12 New England Executive Park
Burlington, Massachusetts 01803

Dear Ralph:

As you begin reviewing drafts of FAA proposals addressing the future of Pease, you should be aware that our immediate concern is over the potential loss of air navigation support from current facilities and the impact it would have on the State of Maine. Even today we are faced with Brunswick Naval Air Station wishing to reduce coverage, partial loss of coverage at Portland, and now the elimination of radar coverage from Pease. These actions concern us as we feel the State is faced with a significant reduction in services and safety.

While it can be argued that air traffic transiting the area at altitude will continue to flow freely with coverage from Portland and Manchester, we cannot dismiss the fact that the location of Pease radar provides an extra margin for safety which cannot be duplicated by the other radar facilities. We believe that loss of facilities at Pease will adversely affect three airports--Littlebrook, Sanford, and Skyhaven. Specifically, Pease can look into airport traffic and provide separation between IFR and VFR traffic similar to the coverage provided in Augusta by Brunswick. This additional coverage adds a considerable safety factor at training intense facilities where IFR traffic breaks out to find unexpected traffic in the pattern.

I understand that planning is under way to address these issues of radar coverage. These plans, as I understand them, include long-range changes--for instance a new radar for

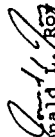
JAN 8 1990

THE MAINE DEPARTMENT OF TRANSPORTATION IS AN AFFIRMATIVE ACTION-EQUAL OPPORTUNITY EMPLOYER

Mr. Ralph Nicosia-Rusin, Airport Planner
January 4, 1990
Page 1

Portland and changes at Manchester. Unfortunately, we are not privy to the internal planning or the recommendations of the FAA. Suffice it to say, we would not support a degradation of service at Pease before an acceptable alternative to provide similar radar coverage capability is in place.

Sincerely,


Ronald L. Roy, Director
Air Transportation Division

RLR:nl

cc: Jack Hardy, Littlebrook Airpark
John Webb, Sanford Town Administrator
Harold Boker, Director New Hampshire Aeronautics Division
Jim Lucas, Air Traffic Division, FAA New England Region
Michael Farren, Coordinator, Pease Redevelopment Commission
David Richards, Chairman, Airport Study Group, Pease Air Force Base Redevelopment Commission

Pease Air Force Base Redevelopment Commission

300 Gosling Road, Portsmouth, New Hampshire 03801
TELEPHONE: 603-433-6088 FAX: 603-427-0433

February 9, 1990

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Dr. Stirts,

Enclosed please find the comments of the Pease Air Force Base Redevelopment Commission on the Draft Environmental Impact Statement (DEIS) for the closure of Pease Air Force Base.

At Commission direction, our Environmental Clean-Up Advisory Committee was charged with preparing the Commission's response. We feel this committee accomplished its task well and the Commission endorses this effort.

Additionally, enclosed are the comments of our master planner/consultant, Bechtel Corporation. Bechtel has provided an insightful and detailed analysis/comparison of the Commission's Scoping Comments (April 1989) and their inclusion in the DEIS. We strongly suggest you thoroughly review these environmentally sensitive issues and more adequately address them in the final EIS. Further enclosed are individuals' comments that were specifically provided to the Commission on the DEIS.

By way of summary comments, the Pease AFB Redevelopment Commission was disappointed that socio-economic data was not included in this DEIS, since we must make definitive planning decisions well prior to the Air Force's Reuse/Disposal EIS. We need the baseline economic data that would be derived from a socio-economic analysis so that our planning process can make more informed decisions.

Similarly, although the FB-111 force structure movement is not considered a part of the closure EIS, its impact will occur simultaneously with the phase out of the SAC mission at Pease. Thus, the decision not to include the FB-111 movement appears to be an artificial and arbitrary decision that masks the true impact of Pease closure.

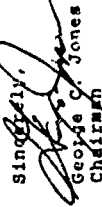
Finally, Pease closure can not reasonably be disassociated from other federal/Department of Defense activities on and off Pease that occur or result from the fact that Pease AFB is currently an active Air Force flying installation. In this regard,

page 2
February 9, 1990
Dr. Hugh Stirts
HQ SAC/DEV

I am referring to the Defense Logistics Agency's tank farm on the Piscataqua River, as well as the associated pipeline; the trash-to-energy plant on Pease AFB; the schools on Pease; and the numerous easements and rights-of-way that directly support the Pease operation.

Pease closure will have direct and lasting bearing on these activities. These related activities should be addressed up front as a function of closing.

It is impossible to address in this cover letter all the very cogent and significant comments contained in the attached enclosures. The Pease Redevelopment Commission requests that you consider all the comments and addenda as a whole supporting package reflecting the Commission's position on the matter, and we ask your urgent attention to repairing what we consider an incomplete and flawed document.

Sincerely,

George C. Jones
Chairman

attachments:
Advisory Committee Report, and Addenda 1, 2, and 3
Consultant/Bechte/ Comments
Individual Comments

cc: David A. MacKinnon, Project Manager, OPA
John O. Rittenhouse, Deputy for Installations Mgmt., OS/USAF
Environmental Clean-Up Advisory Committee
Bechtel Team, Consultant
Col. James R. Wilson, 569 CSG/CC, PAFB
Robert P. Cheney, Esq., Attorney General's Office
New Hampshire Dept. of Environmental Services
Johanna M. Hunter, US EPA, Region I
New Hampshire Congressional Delegation

ENVIRONMENTAL CLEAN-UP ADVISORY COMMITTEE

RESPONSE TO UNITED STATES AIR FORCE

ENVIRONMENTAL IMPACT STATEMENT (CLOSURE)

PEASE AIR FORCE BASE

TO THE PEASE AIR FORCE BASE

REDEVELOPMENT COMMISSION

JANUARY 29, 1990

PRELIMINARY DRAFT - NOT FOR PUBLIC DISTRIBUTION

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PRELIMINARY DRAFT - NOT FOR PUBLIC DISTRIBUTION

ENVIRONMENTAL CLEAN-UP ADVISORY COMMITTEE
RESPONSE TO UNITED STATES AIR FORCE
PEASE AIR FORCE BASE
DRAFT ENVIRONMENTAL IMPACT STATEMENT (CLOSURE)
TO THE PEASE AIR FORCE BASE REDEVELOPMENT COMMISSION

The Pease Air Force Base Environmental Clean-Up Advisory Committee ("Advisory Committee" or "ECAC") was requested by the Pease Air Force Base Redevelopment Commission ("Commission") to coordinate and draft the proposed response to the United States Air Force Draft Environmental Impact Statement for the closure of Pease Air Force Base ("EIS"). The Advisory Committee's proposed draft response is set out below in Parts I-V inclusive below.

Written comments of the Advisory Committee to the EIS are due to the Commission not later than Monday, January 29, 1990, and written responses of the Commission are due to the United States Air Force ("Air Force") not later than Tuesday, February 13, 1990.

PART I. EXECUTIVE SUMMARY

A. The Basis of the Advisory Committee's Proposed Draft Response

Written comments were solicited from area towns and cities and their planning departments, state agencies, private groups, federal agencies having jurisdiction, and individuals in accordance with ECAC assignments set out in Appendix A-1. Committee members were assigned to specific interest groups, made contact with each, and written comments were received from the following Advisory Committees to the Commission: Economic Development ("EDAC"), Airport Study ("ASAC"), and Government Relations ("GRAC"). Written comments were requested from The Bechtel Corporation ("Bechtel") and such comments are apparently being delivered by Bechtel directly to the Commission with a copy to the ECAC. Please see correspondence of Advisory Committee Chairman Field to the Commission, dated January 23, 1990, for further discussion of the Bechtel role.

Written responses received by the Advisory Committee on or before the January 26, 1990 comment due date are attached in Appendix B.

The Advisory Committee members attended the January 17, and January 18, 1990, Public Hearings scheduled and conducted by the Air Force in connection with the EIS in the Towns of Newington and City of Portsmouth. In addition, on January 23, 1990, the Advisory Committee scheduled and conducted a properly noticed and well advertised Public Hearing in Newington seeking additional commentary and information from the public regarding the historical presence of environmental contaminants on Pease

Air Force Base ("Pease") or ancillary facilities and the associated impacts and threats to public health. (See Notice in Appendix A-2) Information from the public was received at and following such Public Hearing.

The Advisory Committee has attempted, in a constrained time period, to review the issues raised and analyzed, or omitted, in the EIS including the "sites" on Pease identified in the Installation Restoration Program ("IRP") process, as well as the impacts to, and of, non-DOD or Pease facilities and off Pease sites such as the bulk fuel terminal, tank farm, pipeline to the base, and railroad right-of-way accessing Pease.

B. General Overview

The termination of the strategic defense mission and the related departure of the Air Force from Pease, in the opinion of the Advisory Committee, will create community upheaval, a "vacuum" of federal monies, the loss of substantial federal and civilian employment, the loss of non-profit and governmental volunteerism, the termination of substantial Air Force mission related activities affecting both the bio-physical and socioeconomic environments in Portsmouth, Newington and the surrounding communities, a reduction of the local school population, and the loss of substantial services to military retirees and other active and/or retired employees of the Federal Government entitled to utilize privileges and services provided to them at Pease.

Without comprehensive discussion and analysis by the Air Force in the EIS of the profound environmental and socioeconomic impacts which will inevitably and directly result in the short and long term when the Air Force mission, personnel and facilities depart, and without the further discussion of reuse impacts based upon theoretical alternative redevelopment scenarios, neither the Commission, nor Bechtel, nor others involved in the reuse planning process will have, as input to such planning process, the necessary pre and post departure enviro-socio-economic information critical for proper planning. The planning process will be unable to responsibly account for and/or address the "voids" left by the departing Air Force mission because such "voids" will not have been properly assessed from both quantitative and qualitative perspectives.

The determination apparently made by the Air Force at "Air Staff" level to discuss the dramatic impacts of mission termination and Peace closure in two (2) separate EIS documents, (and one (1) Environmental Assessment documents currently being prepared in connection with the F8-111 Force redeployment) the first of which is now under comment, and the second of which is referred to as the "Reuse EIS" to be prepared after the Commission (with Bechtel's input) establishes the redevelopment plan, deprives the Commission, the local municipalities, the State, and private citizenry of critical environmental and socioeconomic impact information and analysis sufficiently early in the planning process in 1990 and

239 - As discussed previously, a relationship between socioeconomic impact and biophysical effect, which would necessitate inclusion of a detailed socioeconomic analysis in the closure EIS, was not identified. For this reason, it was not necessary for the completeness of this document to forecast the socioeconomic consequences of base closure. Additionally, the Air Force believes the analysis of reuse alternatives will be more beneficial to the decision making process if speculation can be kept to a minimum. This can best be accomplished by doing a detailed environmental evaluation of the local alternatives identified by the Peace AFB Redevelopment Commission and the reasonable alternatives identified by the Air Force which are being seriously considered. The Air Force will also have to evaluate alternatives necessary to fully comply with environmental guidelines such as the no reuse action alternative. The Air Force is aware of the importance of timing in regard to base reuse to minimize all adverse effects of base closure. All reasonable steps are being taken to expedite preparation of the reuse EIS. An appropriate schedule will be set for its completion. Refer to response 1. The effect the INP will have on disposal will be addressed in the reuse EIS.

1991, a period during which the bulk of the crushing impacts will be absorbed. The Advisory Committee submits that the "Air Staff" level decision is at best "flawed", and at worst patently unlawful under Federal case law. (See below.) The Commission has apparently been informed that no "Reuse EIS" can even be initiated until one (1) year from May 1990. (George C. Jones, Chairman) Since the Reuse EIS is not expected to be completed prior to May 1991, and clean-up, including the five (5) IRP sites slated for expedited remedial action, not expected to be completed for three (3) years, redevelopment will as a direct consequence be postponed to an unknown time after that date.

Due to the recent National Priority List ("NPL") nomination of Pease and probable designation as an NPL site, and the establishment of the Environmental Protection Agency ("EPA") as the lead federal agency supervising clean-up in accordance with an EPA Interagency Agreement ("IAG") dictated time schedule (a time table itself not mandatory to the IRP process) the Commission, local municipalities, State government, and affected citizenry will have no legal right to compel adherence to a speedy clean-up and transfer of the Pease property, and will be regulated to "bystander" status and prevented from initiating the redevelopment process involving environmental and socioeconomic remediation of the "vacuum".

The IRP has been ongoing since the mid-1980's and is soon to be superseded by the NPL, such that the overall Comprehensive

Environmental Response Compensation and Liability Act ("CERCLA") "superfund" process will now be controlling and all standards of the National Contingency Plan ("NCP") and all State standards will be employed in the EPA clean-up process in conformance with other nationwide Superfund sites. It should be noted, however, that the \$8.5 billion CERCLA Funding for "all non-Federal" sites is not available for the Pease clean-up (a member of the public testified that Pease "clean-up" could potentially cost between 50 to 100 million dollars), and Congress must fund the IRP/IAG clean-up at Pease through Department of Defense Appropriations. Furthermore, the fact of private reuse is dependent upon, a) the assent of the Air Force, b) the rejection of the base property by other interested Federal agencies, and c) the agreement of the Air Force to the price it shall receive for the property.

Although the Base Closure and Realignment Act ("BCRA") apparently does not mandate clean-up prior to transfer, nevertheless, it is evidently the present policy of the Air Force to do so. John Rittenhouse, Assistant Secretary of the Air Force and spokesman as to Pease, has stated publicly that the Air Force will not allow contaminated property to be transferred until it is cleaned up, and, therefore, DOD clean-up funding, and Congressional action in support thereof, is another potential cause of delay which bears on the decision to bifurcate the Environmental Impact Statements and the timing of redevelopment.

"The Department of Defense should develop an efficient and time-sensitive property disposal strategy...Time is a particularly precious commodity for private investors (Emphasis added). When a community has assembled a package that includes private investments, success often depends on getting real-estate matters settled so that redevelopment can proceed...not every base closure has led to economic recovery." Chapter 7, "Base Realignment and Closures", Report of the Defense Secretary Commission. (See Economic Redevelopment Committee's written draft response to EIS in Appendix B-1 for a further detailed analysis of the economic impact).

"The Remedial Investigation/Feasibility Study (RI/FS)" regarding the IRP "is proposed to be completed by May 1991. (See page 3-9 p.5 of the EIS) The Record of Decision ("ROD") from the EIS is expected, but not guaranteed, in May of 1990, before which time Air Force personnel state that "closing" activities cannot begin. Upon inquiry, it appears that the expression "closing" as defined by the Air Force is limited to the act of finally "locking" the gates at Pease; and, currently does not encompass the redeployment of the FB-111 mission from Pease.

To postpone the kind of detailed analysis required in an EIS of a major federal action with significant effects upon the environment until reuse planning and redevelopment efforts are given the green light at an uncertain time not within the control of the impacted communities is to postpone the essential analysis to a remote date long after the profound impact has cut its swath. (Environmental risk assessment as part of the IRP clean-up of the five (5) most contaminated sites on the base "will be performed within the next three (3) years to determine whether actual or potential harm to public

health or welfare in the environment is posed". (Emphasis added) (See page 3-14 p.1) The Advisory Committee is, of course, aware that a redevelopment plan is critical to analyzing the impact of the replacement "private mission," but reuse assumptions of alternative redevelopment scenarios and associated time tables could be made for the purpose of early EIS analysis both of the short and long term overall impacts associated with Air Force departure and redevelopment.

The related Air Force decision, again made at "Air Staff" level, that the previously programmed Force Structure Action involving the departure of 21 FB-111 aircraft together with associated support missions would not be addressed in the EIS, (apparently on the rational that the decision was "separate" having allegedly been made at least one (1) year prior to the Congressional base closure action, and further that such federal action (the departure of the FB-111) warranted only an Environmental Assessment (EA) as opposed to an EIS) again deprives the Commission, local and state governments, and affected citizenry of the right to needed environmental and socioeconomic analysis and information respecting this major portion of the Air Force departure from Pease.

Air Force personnel state that the EA for the FB-111 departure is expected to be available in written form, although not presently scheduled to be released to the public, in

242 - Refer to response 104. A finding of no significant impact, which declares that there is not a need to prepare an EIS for the FB-111 action, has been prepared by the HQSAC Directorate of Environmental Management and signed by the Vice Commander, HQSAC.

February of 1990, but apparently not prior to the February 13, 1990, deadline for written comments filed in connection with the pending EIS. Such scheduling evidences a striking and disappointing example of the failure of the Air Force planning schedules to "dovetail"; and, suggests an intentional effort to obfuscate the redevelopment and base conversion process.

Following the publication of the EA for the departure of the PB-111 mission the Secretary of the Air Force is authorized to determine whether an additional EIS is necessary for this federal action. However, all knowledgeable parties apparently believe at present that no such decision (to prepare an additional EIS) will be made by the Secretary at that stage.

The Air Force has determined, as referenced in the EIS, not to consider and analyze the environmental and socioeconomic impacts of the Air Force departure on the non-DOD facilities located at Pease including the (i) waste to energy facility, (ii) the two (2) schools, and (iii) the New Hampshire Air National Guard facilities which will remain.

Similarly, the Air Force has elected to omit in the EIS any impact analysis for the "off base" but critically interrelated support facilities, including (i) the fuel tank farm and bulk fuel terminal located on the Piscataqua River, (ii) the pumping facilities, (iii) the associated fuel pipeline to Pease, and (iv) the railroad right-of-way accessing the base.

PART II. SUMMARY OF DEFICIENCIES AND AREAS OF ANALYSIS OMITTED
IN THE EIS

A. Multiple ("Segmented") EIS. The decision to bifurcate the "Closure" from the "Re-Use" EIS is improper and problematic given the Commission's legislative mandate, in the fulfillment of which, the Commission needs available to it sufficient facts and information to determine the proper response to closure i.e. "filling the "vacuum" created by the Air Force departure."

The Advisory Committee believes the "segmentation" of the EIS process constitutes (1) an improper and perhaps unlawful attempt to circumvent the fundamental policies of the National Environmental Policy Act ("NEPA") and (ii) is contrary to 42 USC §4320 et seq. as discussed in the United States Court of Appeals, Second Circuit Case, Conservation Society of Southern Vermont, Inc. v. Secretary of Transportation and Vermont Natural Resources v. Claude Brinegar, Secretary of Transportation 508 F.2d. 927 (1974). In such case it was determined that an EIS prepared in connection with highway construction must be addressed comprehensively rather than in phases.

B. FB-111-Force Structure Action The Air Force "Air Staff" decision to narrow the scope of the EIS by excluding from consideration the departure of the FB-111 and the

244 - The Pease AFB Redevelopment Commission's responsibilities, based on New Hampshire State law, do not of themselves expand the scope of the Air Force environmental analysis requirements pursuant to NEPA. The case cited is both factually and conceptually distinguishable from the situation presented by the closure and reuse of Pease AFB. The Conservation Society case involved a situation where an EIS had been prepared for an 18-mile stretch of highway in the State of Vermont. However, a long-range goal existed to construct a 280-mile super highway through five states, of which the 18-mile segment would form a part. It was the view of the court in that case that the construction of the 18-mile piece of road represented only one piece of a larger undertaking. Because construction of that segment represented an "irreversible and irretrievable commitment of resources" which would limit the range of alternatives with regard to the remaining portions of the super highway, an EIS covering the entire length of the highway was required. Clearly, construction of the 18-mile segment would limit the range of alternatives regarding the remaining length of road. Conversely, the closure of Pease AFB will not limit the range of alternatives which will be available regarding reuse of the base. In this respect, base closure and reuse are independent actions. Although the decision to close Pease AFB is a condition precedent to reuse, the closure of the base will not affect the range of alternatives which may be considered for reuse.

supporting infrastructure is improper and contrary to the mandate of "cooperation". The EIS must include the departure of the FB-111 given its significance in the overall existing Pease mission and given the lack of a truly significant rational with which to carve out the departure of the FB-111 from the closure of Pease. Although these two actions theoretically happened from a decision making standpoint one (1) year apart, the proximity in time of the implementations of the actions, and the high probability that the departure of the FB-111 contributed to an inevitable DOD sponsored Congressional decision to close Pease, compel the conclusion that both departures must be considered as one functional event.

245

The "Air Staff" level decision to review the FB-111 departure only in an EA is improper within the requirements of NEPA, the Council on Environmental Quality ("CEQ") regs. and Air Force Reg. 19-2. The 19-2 Regs. require the Air Force to do an EA or an EIS for a wide range of actions if not covered by the twenty-four (24) categorical exemptions, none of which appears to apply to the Pease closure. (The Agency, under the EA procedure prescribed in NEPA §102 is not required to consider alternatives outside of its "control".) (Neither NEPA nor the CEQ regs. dictate who the decision maker shall be as regards to "control" or to the preparation of an EA or an EIS. Here the decision was made by "Air Staff".) The profound interrelated socioeconomic impacts of the closure events are discussed in detail in the Economic Development Advisory

245 - It is important to remember that the additive effects of the FB-111 action are included in this EIS. The proximity in time of the implementations of the FB-111 and closure actions compel the conclusion that both actions can be most efficiently implemented together even though the decision to implement each action was made a year apart. Air Force Regulation 19-2 requires that when a proposed action is one that does not usually require an EIS and is not categorically excluded, an environmental assessment (EA) must be prepared. The regulation further requires that every EA must lead to a decision to prepare a finding of no significant impact, an EIS, or to take no action on the proposal.

Committee Report by Carlton P. Morin, Chairman, and found in Appendix B-1. It is noteworthy that the same group of experts within the United States Army Corps of Engineers is preparing both the FS-111 EA and the Pease EIS, and presumably knew, or should have known of, the interrelationship and functional tie-in of the closure events.

C. The Time Schedule Dislocation of Environmental Clean-Up and Redevelopment. The EPA supervised NPL Superfund type "clean-up" is independent from and not within the control of parties most interested and responsible to the public for designing and implementing an effective redevelopment plan. First, the "clean-up" process will be lengthy (5 to 10 years). The final EIS is to be completed by April, 1990, and the ROD is expected to be finalized in May 1990. However, such EIS does not, at present, address comprehensive closure and "clean-up" issues.

Arthur Ditto, Base Engineer, and Colonel James R. Wilson, USAF, Base Commander, each have indicated that no "closure" action can be taken until the ROD is issued, an event not expected to occur before May 1990, and that such date could be delayed by rewrites or lawsuits.

Since the RI/FS is proposed for completion by May 1991, the implication is that no "clean-up" activities, other than those being conducted in connection with the five (5) sites

stated for expedited remedial action (Table 3.4.8-1), will occur before such date.

Other Federal Agencies to whom inquiry letters were sent in mid-November 1989 by the Air Force have first option to make claim to all, or portions of, the Pease facilities. Responses were expected by mid-December 1989, yet little information has been made available to date as to the nature of such responses. Apparently, however, there have been some requests for additional time to evaluate and identify possible need. Although redevelopment of Pease is critical to offset the anticipated "vacuum" created as a consequence of the departure of the Air Force mission, the IRP IR/FS is not expected to be completed until May 1991 (page 3-9 p.5). The IRP risk assessment of the five (5) critical sites may not be completed for three (3) years. (page 3-14 p.1)

Further, as a fundamental tenet of "environmental law" there is a very serious issue as to the wisdom of either the Commission or an independent third party (including the developers) accepting a transfer of title to all or any portions of Pease real property prior to "clean-up".

More information must be released to the Commission and to the public by the Air Force to permit an informed analysis of the Roy F. Weston, Inc. reports regarding the IRP Phase III and Phase IV remediation schedules.

246 - Refer to responses 35, 96, and 172. Other Federal agency interest in Pease AFB real estate will be addressed in the reuse EIS.

It is unclear throughout the EIS how the Air Force proposed to address its hazardous waste "clean-up" obligations during the proposed redevelopment/reuse activities. It is also unclear how the Air Force intends to evaluate and access existing, and/or future sites hereafter identified and slated for "clean-up" once Pease has either been developed or is subject to development.

The Advisory Committee feels that there may exist a general insensitivity to and/or lack of awareness of environmental issues and concerns, which the Advisory Committee believes should be the threshold issue of concern to the Commission. The public seems to perceive the closure and redevelopment process as being more advanced than it is in light of the multiple and complex clean up activities which must be done. The three (3) years it will take to complete the risk assessments of the five (5) principal sites will not benefit developers wishing to utilize the areas prior to the three (3) year study.

D. The New Hampshire Coastal Program and NOAA

Involvement.

In September of 1988, the U.S. Department of Commerce National Oceanic and Atmospheric Administration (NOAA) approved the New Hampshire Coastal Program and Environmental Impact Statement to include all the tidal portions of New Hampshire's coast. Although Pease is specifically excluded from the program's

247 - If the New Hampshire Coastal Program boundary is altered to include a portion of Pease AFB property during the preparation of the reuse EIS, the program will be discussed in that EIS. Refer to responses 148 and 155 also.

boundary and jurisdiction, it is likely the coastal program boundary will be altered to include a portion of Pease property adjacent to Great Bay. The EIS should discuss the program and the impact of the program on base land adjacent to Great Bay. Furthermore, in October of 1989, NOAA designated Great Bay and adjacent areas as a National Estuarine Research Reserve. Further discussion and consideration of the application of this program and of the existing Memorandum of Agreement between the State of New Hampshire and Department of Defense on the future use of lands adjacent to Great Bay needs to be addressed in the EIS.

E. Ancillary/Support Facilities The failure of the EIS to include analysis of the fuel terminal, tank farm, connecting fuel pipeline and pumps, and the railroad right-of-way is improper and totally unsatisfactory. Pease uses 85% of the jet fuel from the tank farm (2 million gallons per month to Pease, 300,000 gallons per month to the General Electric jet engine plant in Lynn, Massachusetts, and 50,000/all other), the Air Force appears to enjoy legal ownership of Pease, the bulk fuel terminal, the tank farm, the pumping stations, and the connecting pipeline.

The Defense Logistics Agency ("DLA") through Defense Fuel Supply Point ("DFSP") operates the tank farm and is in the process of reviewing its operation to determine whether it will continue to operate after Pease closure. A decision is

expected soon. As soon as the DLA determines it no longer has need for the tank farm, it is anticipated that local Air Force personnel will produce a "Declaration of Excess Property".

Furthermore, at this moment, DFR-Northeast has virtually concluded that the tank farm will be shut down in June of 1991 notwithstanding the existing contract with private operators which expires June of 1992. Apparently, there simply are not enough local DOD fuel requirements to justify the continued use of the storage/terminal facility once the Air Force has withdrawn the FB-111 mission from Pease. The rationale for separating consideration of the tank farm facility in the EIS is, in part, based upon its separate installation code designation "RWSG" the Pease code being "SZDE". The terminal, tank farm, pipeline and pumping facilities must be comprehensively addressed by the Air Force in the EIS.

F. Terminal/Tank Farm Environment As a dedicated JP-4 facility, the tank farm, for years, has been operated primarily to supply jet fuel to Pease, a fuel which includes substantial specialized additives.

The documented leakage and spill history and environmental contamination information involved in the ongoing clean-up process must be analyzed in the EIS in compliance with applicable law and regulation and in order to permit the Commission, from both the planning and development standpoint,

to include this ancillary facility as part of the base proper and to integrate the terminal, tank farm, and connecting pipeline into reuse planning and environmental "clean-up" time schedules. The DLA commissioned a report which is presently at the State of New Hampshire under review addressing ongoing remediation. This information should be analyzed and discussed in the EIS.

G. Pipeline From Tank Farm The pipeline and pumping facilities likewise appear to be owned by the Air Force under the "RSWE" designation up to the perimeter boundary of Pease. Evaluation and study of the pipeline is also essential to comprehensive Pease redevelopment.

H. Railroad Right-of-Way The entire railroad right-of-way is owned through easements by the Air Force sufficient in scope to construct, maintain, redevelop and operate the rail line. These rail lines and/or easement rights were, and continue to be, an integral part of Pease and discussion of same must be included in the EIS. The omission is improper and overlooks (again, apparently through the mechanism of a different installation code) the Commission's needs, both in the IRP process and in the EIS, to have the impact of closure and remediation data analyzed and available.

I. Munitions and Radioactive/Heavy Metal Contamination
Although Air Force policy is to neither deny nor confirm the

249 - The FEIS has been expanded to include a discussion of the spur track from the Boston & Maine main line to base property. The likely disposition of property rights and the condition of the trackage are discussed. Changes were made to Section 2.2.1, page 2-3; Section 3.19, page 3-49; and Section 4.18, page 4-21 in the FEIS.

presence of nuclear weapons at a facility, security measures in place at Pease, the strategic defense mission of the FB-111 force, and information published by the Institute for Policy Studies, "Nuclear Battlefields," lead the Advisory Committee to believe that either now, or in the past, an arsenal of approximately 190 nuclear weapons (65 megatons) were stored at Pease's underground bunkers. Further, we are lead to believe that such weapons are transported, primarily by air cargo, on and off Pease on a regular basis. In light of the contemporary discussion concerning health hazards associated with berillium dust and fumes at the Rocky Flat, Colorado, the potential environmental and health effects resulting from the presence of nuclear and/or chemical weapons at Pease throughout its history certainly can be discussed in the EIS as a matter of past reality without compromising any legitimate national security interest of the DOD. The "clean-up" of Pease as presently planned does not address adverse health impacts that may be left behind. Will there be an impact and cost to public health of occupational diseases related to working with warheads, detonators and the like? How has the Air Force concluded that there will not be nuclear munitions or chemical waste left at Pease to the extent that such material was located on base in the past. Certainly "geiger counter" testing should be conducted and the results of same reported. Further, dangers and/or hazards associated with the removal of the weapons should also be discussed. See Foster's Daily Democrat, pg 1., July 14, 1989.

250 - The removal of materials from the munitions storage area has been addressed in the EA for the FB-111 action. The removal of the materials will be in accordance with the Department of Transportation's hazardous materials regulations. Any property on which any hazardous substance was stored for one year or more, such as in the ordnance area, that is transferred in the future to any other entity will be addressed as follows. The deed entered into for the transfer of the property will contain a covenant warranting that all remedial action necessary to protect human health and the environment with respect to any hazardous substance remaining on the property has been taken before the date of such transfer. Any additional remedial action found to be necessary after the date of such transfer will be conducted by the United States (42 USC 120(h)).

J. Waste to Energy Facility Environmental contaminants within the facility have been addressed only in passing in the EIS and omitted on the theory that the facility is owned by Portsmouth while the underlying land is owned by the Air Force (existing contracts between Portsmouth and the Air Force give Portsmouth the right to "put" the facility to the Air Force such that the Air Force has a sufficient reversionary interest to compel inclusion of this facility within the scope both of the base closure IRP and the EIS). Reports indicate that some ash is left in the plant and more information is needed about the extent of contamination and clean-up plans.

251

251 - Refer to response 141.

252 - The future use and disposition of the two schools and the base hospital is beyond the scope of this EIS. These facilities will be fully considered in the reuse EIS. Refer to response 100 also.

K. Hospital and Schools. The Advisory Committee has determined that the two (2) school buildings are owned by the United States Department of Education and the land on which the buildings are located is owned by the United States Department of Defense. The hospital is apparently owned by the Air Force. Further discussion regarding the future use, and/or disposition of, such facilities should be discussed in the EIS.

252

L. Mobile Homes. Further discussion regarding the departure of mobile home base families should include the impact on the local schools i.e. 16 children from the mobile homes presently attend Newington Elementary School.

M. Socioeconomic Analysis. The implication throughout the EIS that the socioeconomic consequences of the base closure

will be minor, contradicts basic common sense. The current psychological, sociological and socioeconomic crisis occurring and present within the impact area as well as the facts presented by the Air Force itself as summarized in the redevelopment committee written commentary in Appendix B-1. "The primary objectives of the commission (Defense Secretary's Commission on Base Realignment and Closure) shall be to:

1. Determine....the criteria for realigning and closing bases to include at least:....6. The economic impact on the community in which the base to be closed...is located....8. the environmental impact...."(Charter, Defense Secretary's Commission on Base Realignment and Closure) (See Appendix B-1)
2. 40 CFR §1508.415 regarding "Human Environment" states that "Human Environment" shall be interpreted comprehensively to include the natural and physical relationship of people with that environment..."when an environmental impact statement is prepared and economic or social and natural and physical events are interrelated, then the environmental impact statement will discuss all of the effects on the human environment."
3. Michael F. Farren, Coordinator, reports that in an informal poll conducted of other Air Force base closures, no other socioeconomic information is being developed and that the EIS statements are curiously similar in text,

253 - The criteria developed by the Commission were not a consideration in developing this EIS. Refer to responses 9, 63, and 102a also.

i.e. "cookie cutter" approach appears to prevail. This polling result is unsatisfactory.

To conclude that the socioeconomic effects are not inextricably interrelated with the "natural or physical effects" is improper and appears contrary to fact and basic logic.

The decision not to discuss economic impact was made at "Air Staff" level on the rationale that there was not biophysical impact. The same office apparently made the decision to bifurcate the EIS process. The Advisory Committee suggests that "Air Staff" is conveniently attempting to architect a plan which they believe will be found "procedurally" acceptable, but in reality is lacking in "substance". Unfortunately, the "closure" process by virtue of the Congressional mandate is exempt from the very essence of NEPA and is accountable to no one.

N. Population and Growth Projection. Throughout the EIS population and growth projections have been utilized based upon out of date data which is particularly significant in light of the current economic slow down in the northeast. Furthermore, the growth projections fail to take account of the substantial departure in uniform and civilian people employed at the base. Hence, the impact on the local community particularly Newington, Portsmouth, and neighboring towns has been

254 - As presented in response 77, a discussion of recent economic conditions has been included in Section 3.13.2, page 3-31, of the FEIS. Forecasts of changes in employment and population are a socioeconomic consideration. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

dramatically under emphasized by diluting local impact with county wide population growth figures ("in urban areas, the 1980 populations figures were adjusted based on the percentage of growth projected to occur by 1990. Population projections prepared by the New Hampshire Office of State Planning for 1990 were used in making these adjustments. (see page 4-13 p.2)

"population growth has occurred in the three county area during recent years and is projected to continue. The area experienced an annual average population growth of 2.6% between 1970 and 1980 and 2.0% between 1980 and 1988...and is projected to grow at an annual average rate of 1.6% through the end of 1993." (see page 3-31 §3.13.3 p.1)

O. Staleness of Environmental Information. Local

Newington private citizens have pointed out that recently an area off McIntire Road was "flagged" possibly for reasons of new environmental concerns. The public or local officials have yet to receive some 20 to 30 of the Roy F. Weston, Inc. reports developed as part of the IRP process. Are there recent environmental contaminations which have occurred since the fact gathering in connection with the Weston/IRP studies and the Air Force EIS. The Commission needs disclosure and assurances that up to date current information is being provided by the Air Force from the IRP process which is part of the Air Force obligation to cooperate with local communities and the Commission.

255 - The Air Force initiated a second basewide Preliminary Assessment/Site Investigation, using the latest EPA guidance, to ensure that all contamination, both past and recent, has been identified. The 13 IRP documents (now available for public review in the Reading Room in Building 43 on-base) listed in Appendix H, along with future documents, will become part of the Pease Administrative Record, which will be available for public review. The Pease AFB Redevelopment Commission and the local communities will also receive current information through their designated representatives on the Technical Review Committee and through the upcoming community relations activities.

P. Methodology Employed in the EIS. We are struck by the similarities of text in some sections between the EIS for Pease and the Chanute Air Force Base.

Each year Pease publishes economic data regarding the financial impact of the base on the local communities. Certainly the Air Force is in a position to provide more detail and analysis concerning the present reality of complete Air Force departure. It is suggested that Pease "pumps" \$107,000,000 in wages into the local economy. Query, does such number accurately reflect "pay allotments of military personnel, mortgage and/or installment debt paid by personnel to out of state creditors, and/or child support and alimony payments made to dependants and/or former spouses living in other parts of the country.

256

More disclosure is needed regarding the physical data reviewed and tests performed including geophysical data (ground penetration radar and magnetometer studies) soil gas analysis, soil borings, test pits, monitoring wells (76), and surface water sampling sites (25-30) and with reference, for instance, to whether Material Safety Data Sheets (MSDS) were reviewed as to all chemicals and materials handled at the base and the tank farm. What is the effect of same on public health?

257

It was reported by one member of the Portsmouth City Council at the January 18, 1990, Public Hearing that a member

256 - The comment concerning similarities is noted. Refer to response 63. The questions regarding the economic information presented in the report is beyond the scope of the closure EIS. Such questions may be addressed to the Pease AFB Commander.

257 - Locations and a brief description of the IRP sites are provided in Appendix H to the FEIS. Detailed discussions of all field investigations, including ground-penetrating radar and magnetometer studies, and ground water monitoring activities can be found in the IRP documents listed in Appendix H. These documents are available for public review in the Reading Room in Building 43 on-base. Material Safety Data Sheets were reviewed during the base-wide records search. During the Phase II, Stage 2 investigations, these sheets provided valuable information on toxicity and persistence for use in calculating potential risks to human health and the environment. The sheets will be reviewed again in the planned preliminary assessment scheduled for this spring/summer. Information from the sheets may also be used in risk assessment calculations in the continuing RI/FS.

258 of the Army Corp of Engineers made one call to one local official regarding how much Federal money would be lost to public schools with the closure of Pease. No further questions were raised. We suggest that the Commission is entitled to more information as to the soundness of "base line" data, and the methodology employed by the Corp to gather such data. Is the data used to prepare the EIS statistically valid?

259 Finally, the Advisory Committee suggests that the EIS contains more "cross referencing" to other documents being prepared in connection to Pease closure, i.e. the impact of the decision to utilize the EA process and the implication of same should have been disclosed.

260 Q. Non-DOD/Off Base Facilities The EIS must evaluate and discuss all related issues for these facilities. The non-DOD facilities, i.e. schools, the waste energy plant, the pipeline easement, the railroad right-of-way, the bulk fuel terminal and tank farm, and large remaining acreage on the base not covered within the scope of the IRP process needs to be further described and analyzed throughout the EIS.

PART III. EXECUTIVE SUMMARY OF EIS

Annotation Protocol to the EIS. The detailed response to the EIS is set out in this Part III referencing first the page number, and next the section number, and finally the paragraph within the EIS Section. If a section number carries over to the next page, the top paragraph of the page, whether full or

258 - Several contacts were made with Portsmouth school officials regarding the status of Brickett and Jones elementary schools. Information on school funding, including Federal and local sources, was also obtained. The contractor for this EIS is the Onal's District, U.S. Army Corps of Engineers. Baseline data were collected in this analysis in the same manner used by the Corps for other EIS's. Data are largely collected from Federal, State and local sources. Site visits were required in some instances. Much of the baseline information concerning Pease AFB was provided by the Air Force. The Air Force is satisfied that the information contained in this report is sufficiently reliable for environmental analysis purposes.

259 - Section 2.1 of the DEIS did disclose that the PB-111 action was being addressed in a separate environmental impact document. Refer to response 104 also.

260 - The facilities of concern have been addressed in the preceding responses. The IRP covers the entire base. The earlier records search under the IRP did not identify the railroad spur track as an area of concern.

not, is considered paragraph number one. Additional specific notes as to sections comments upon immediately follow any general comments as to the paragraph addressed.

S-1 p. 2 Suggestion that the "...installation and its operation will serve as the base line against which the implementation and impacts are judged..." ignores the probability that the base line, due to postponement of development could well be the "vacuum" base line remaining prior to postponed redevelopment.

S-1 p.4 The force structure change (FB-111) should be included in the EIS and the reference to "cumulative impacts" being "included in this EIS" is misleading unless socioeconomic impacts are included.

S-2 p.1. There should not be a segmentation of the EIS since the EIS states on page S-1 p.1 the Air Force in fact anticipates "local authority electing to operate the facility as an airport." This is an example of one tier of alternative reuse assumptions which could be made now for the purpose of developing a comprehensive EIS. (2-3 §2.2) "The commission also believes that the NHANG unit would be likely to remain."

Chapter 1 Description of and Need for Closure Action

2-1 §1.1 The force structure change involving the companion departure of the FB-111, although not specifically part of the EISA, is inextricably connected both in time, the agency involved, and the substance of associated activity.

261 - An appropriate baseline will be developed for the reuse EIS. Page S-1 of the FEIS has been changed to read "cumulative natural and physical impacts." Refer to responses 239 and 245 also.

262 - Refer to responses 245 and 247.

1-1 §1.4.2 p.2 The September 1988 U.S. Department of Commerce (NOAA) approved New Hampshire Coastal Program and EIS including all tidal portions of New Hampshire's coast should be referenced given the likely inclusion into the program of base property adjacent to Great Bay.

263 - Refer to response 245. The quotation in your comment is incorrect. The first phrase of the quotation should have been "Because of a previously programmed force structure action . . ."

Chapter 2 Alternatives Considered Including the Closure Action

2-1 §2.1 p.2 The rationale for the statement-"The cause of the previously programmed force structure action, the relocation of the 21 FB-111 aircraft at Pease AFB, is not considered as part of the closure action."-is offered without rationale and a substantive distinction between the two (2) actions cannot be made. The EIS should reveal the decision making process and the basis for the conclusion that the actions are sufficiently separated and distinct to lawfully cut out the departure of the FB-111. (The relocation time table for the FB-111 is July to September 1990.)

The last of the 509th Ground Support Group ("GSG") will inactivate on April 1991. (2-2 p.3) By the end of the second quarter of fiscal year 1991 all that will remain is a base maintenance staff of 50 civilian employees (2-3 p.1).

2-1 §2.1 p.3 The statement "the cumulative impact of this action, however, are addressed in this EIS." implies (to the layman at least) the inclusion of socioeconomic impacts which

264 - The "cumulative impacts of this action" taken from Section 2.1, page 2-2, of the DEIS refers to the combined impacts of removing the units previously discussed in that section from Pease AFB. As defined in Council of Environmental Quality Guidelines, 40 CFR Part 1508.7, "cumulative impact" is the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions. The term cumulative does not infer that all impacts of base closure will be considered regardless of their relationship to environmental analysis requirements. Socio-economic impacts were not considered for reasons discussed previously. Please refer to responses 9 and 102a. A statement regarding why socioeconomic impacts are not considered is contained in Section 4.11, page 4-9, of the FEIS.

265 - The IRP covers the entire base, including properties which have been leased to the NHANG.

266 - Refer to response 250. The Air Force will be responsible for remedial action for any off-base sites that have been contaminated by prior hazardous waste disposal activities or for release of hazardous materials by the Air Force at Pease AFB. Contamination due to recent activities will be addressed through the Resource Conservation and Recovery Act. Contamination due to past activities will be addressed under the IRP.

267 - This section is correct as presented in the DEIS. There is no attempt in the DEIS or FEIS to estimate the magnitude of socioeconomic impacts or the resources for mitigation. As stated previously, the Air Force plans for socioeconomic analysis as related to the reuse of the base are described in Section 4.11, page 4-9.

264 should be, but are not, addressed, and, if not to be included, a clear statement to that effect should be made. The EIS should reveal the decision making process and the basis for the conclusions.

2-4 p.2 More discussion is needed as to whether the NHANG buildings and areas are part of the IRP process and what will occur if these buildings contain "hazardous waste". These facilities must also be considered in the overall clean-up obligation of the Air Force.

2-8 p.2 Reference should be made to Air Force responsibility to remediate any and all sites whether on or off the Pease facility which are later identified to be contaminated by prior haz/waste disposal activities or release of hazardous materials at Pease. The Advisory Committee has received unverified information that suggesting that ammunition was dumped in the past at an area in Newington known locally as "Gundalow Landing".

2-8 §2.2.4 This paragraph is misleading since the socioeconomic impact will be devastating. A realistic statement of the limitation of resources available to "maintain or restore community stability" should be set forth.

Chapter 3 Affected Environment

3-3 §3.1.1 p.3 The statement that the "FB-111 aircraft are now scheduled for withdrawal from the base prior to initiation of the base closing." is misleading in that the ROD is anticipated for May 1990 at which time base closure will be initiated and the departure of the FB-111 "will occur in July to September 1990 time period", a period subsequent to the ROD. (see page 2-1 §2.1 p.2)

268

268 - This sentence has been clarified in the FEIS. The new wording is contained in Section 3.1.1 on page 3-1.

269 - Refer to responses 102b and 249. Some storage tanks are being replaced even though their reuse is not yet planned because they are necessary for base operations prior to and during base closure.

3-2 §3.2.1 & 3.3 The description of the installation area should include the terminal facility, tank farm, the connecting pipeline and the railroad right-of-way for reasons referenced in the Part I (Executive Summary).

3-3 What is the rationale for including in storage tank projects their replacement when reuse is yet not planned?

Notes:

- a. The tank farm tanks should be discussed in this section. The ongoing remediation at the tank farm site should be discussed with reference to the scope of current subsurface contamination both from GP4 and fuel additives (to our knowledge in the information gathering stage there has been no review of MSDS handouts).

269

3-4 p.4 Accidental fuel releases at the tank farm should also be discussed. The public has expressed concern as to potential contamination of abutting and/or nearby properties.

3-5 p.3 What are the "self-contained portable storage facilities" and how will they be used?

3-5 §3.4.2 Table 3.4.2-1 Further information is needed as to why there was a substantial increase in hazardous waste generated at Pease during the years 1987, 1988 and 1989 as opposed to 1986.

3-5 §4.2 p.3 There is inadequate discussion in Section four regarding the reference "some hazardous waste are occasionally located on barren soil, up gradient from storm drains" and no reference made to the time table for clean up except the statement that the "planned action is pending receipt of adequate funding."

3-6 p.2 If herbicide use has been so infrequent at Pease, how does one account for the geometric patterns around several hazardous waste sites? Of specific concern is the "detenator" disposal area".

3-6 §3.4.4 In this section on radioactive materials reference should be made, as appropriate, to the Air Force historical practice of holding and handling nuclear weapons and

270 - Refer to response 26. The substantial increase in hazardous waste generation beginning in 1987 was because Pease AFB changed its status in that year from a facility which generated and stored hazardous wastes to a facility which only generated hazardous wastes. In 1987, Pease AFB began the disposal of the hazardous wastes it had been storing. The containerized hazardous wastes that are occasionally located on barren soil or upgradient from storm drains will not cause any impacts unless an accidental spill occurs, which is considered unlikely.

271 - There are no records of herbicides being used in the areas of concern. Mowing practices or ground disturbances could account for the "geometric patterns."

associated radioactive or heavy metal type material.

Note: In the event that chemical weapons were ever used or stored on the base the history of use and storage should be included. Information available during January 17th and 18th, 1990 public hearing seem to suggest less than even a shallow inquiry into this area and yet at one of the public hearings one long standing member of the Air Force stationed at Pease suggested the presence of such chemical weapons at a time in the past.

3-6 §3.4.5 p.3

Note: The lead based paint issue found throughout base housing is too serious an issue for shallow treatment Section four reveals no information or any plan to continue to repair deteriorating surfaces containing lead based paint and/or other specialty/highly toxic paints required in connection with "high-tech" aviation equipment.

3-7 §3.4.6 p.3 What will occur at base housing and other buildings if asbestos becomes friable following base closure or transfer?

3-8 p.2 We would request a discussion of what becomes of the ash and residue of the medical waste incinerated at Pease.

272 - Air Force policy does not permit the confirmation or denial of holding or handling nuclear weapons at its facilities. The member of the Air Force who participated at the hearing did not suggest the presence of chemical weapons. The base does store chemical-protection gear for troops in the event of chemical warfare.

273 - The base protection and maintenance staff will manage deteriorating surfaces containing lead-based or other specialty paints to assure sufficient protection of human health and the environment.

274 - Refer to response 186.

275 - The ash residue of the medical waste incinerated at Pease APB is stored in 55-gallon drums (lids are clamped down) prior to being disposed of by a contractor at a State-approved landfill in Hampden, Maine.

3-8 p.3 If cadmium bearing sludge is mixed with loam and spread throughout the industrial area and on golf tees and greens on the base golf course, what, if any, test were done in these areas. No reference to testing is made regarding these past disposal practices.

3-8 p.4 What is the current status of cadmium levels in the sludge?

3-8 p.5 The statement "The sludge has been mixed with grass clippings and leaves in an attempt to reduce the cadmium levels." leaves open the question of whether the attempts were successful. Will all accumulated sludge be removed? Further discussion of timing of sludge removal should be supplied. Air Force personnel suggest complete removal by June 1990 subject, however, to delays of uncertain duration in finding approved landfills.

3-9 p.5 We understand there are some 20 to 30 additional Roy F. Weston, Inc. reports that are not yet available to the public and therefore have not been reviewed by the Advisory Committee. The Commission and/or its technical advisors should demand access to and evaluate same.

Note: Since the RI/FS is proposed for completion by May 1991, does this imply that no clean-up activities other than those on the five (5) sites slated for expedited

remedial action (Table 3.4.8-1) will occur before this date?

3-10 p.1 The tank farm should be included in this discussion, should be included in the NPL, and should be included in the ICA with the EPA and the State of New Hampshire.

3-10 p.4 The discussion of the contents of the "buried drums mixed with construction rubble" should be included together with an assessment of rupture and leakage from the drums.

3-12 p.2 More information should be supplied regarding the "contaminant plumbs and the extent contour, rate and direction of travel. Further discussion should be supplied as to why "down gradient monitoring points are limited...(such that)...the extent of the plumbs in both bedrock and overburden have not been determined."

3-12 p.4 The extent, contour, rate and direction of travel of "the containment plumbs of TCE and vinyl chloride" should be given as we understand that the Roy F. Weston, Inc. reports are available as to these issues.

Note: Apparently Building 113 is not a 509th Building Maintenance Building.

3-13 p.1 Some reference as to the expected time frame for

277 - The 13 IRP documents (with a total of 26 volumes) listed in Appendix H are now available for public review in the Reading Room in Building 43 on-base. These documents and future reports will become part of the Pease AFB Administrative Record. The record will be available for public review and will be maintained even after the base is closed. All proposed cleanup activities must be reviewed and approved by EPA and NHDQS prior to their implementation. After appropriate cleanup activities are identified, they will be implemented throughout the base as soon as possible. Excavation of the buried drums from Landfill 5 has been completed. Approximately one-fifth of the excavated drums contained varying amounts of liquid waste which will be disposed at an off-base facility. The remaining drums were found crushed; it is assumed they were emptied and flattened prior to burial in the landfill. An assessment of any potential leakage from the drums which contained liquid is currently underway. Detailed discussions of the sites summarized on page 3-12 of the DEIS are contained in the IRP documents listed in Appendix H. Early investigations had only limited numbers of sampling and monitoring points. Current and future investigations, which must meet the stringent standards of EPA and NHDQS, will be extensive enough to fully determine the nature and extent of the contamination. Building 113 is the Avionics Maintenance Squadron Building. Proposed timeframes for remediation of the base are being developed pursuant to the Interagency Agreement. These timeframes will be available through the Administrative Record, also established pursuant to the Interagency Agreement. It is not known what is meant by "jet fuel additives" in your comment. Refer to responses 96 and 102b.

completion for the final remediation should be stated.

3-13 p.2 In addition to the general reference to jet fuel contamination caused by "petroleum hydro-carbons" reference should be made to contamination stemming from jet fuel additives.

3-14 p.1 More discussion is needed as to the probable time frame expected and the effect of such prolonged remediation programs on potential reuse of the base.

3-14 p.2 The statement "the risk characterization will present a qualitative description of potential adverse effects and an estimate of risk to public health and the environment based on existing guidelines and standards" not to occur until sometime "within the next three years" again demands a full discussion of the time table for the final clean-up and the relationship between the time table for clean-up and the capacity of all or portions of the base for reuse together with a time table for transfer to the base to the developing entity.

3-15 p.4 The tank farm jet fuel storage tanks should be discussed in this Section and permits referenced.

3-15 §3.6 The direction, contours and rate of flow of water within the aquifer within and off the base should be discussed as well as the connection between the base aquifer and the

Portsmouth water supply (Sherburn wells, so called).

Note: Inadequate attention is given to the aquifer under the base. How valuable is it? What is the degree and significance of the hydrologic connection to other water supplies such as those currently used by the City of Portsmouth?

3-17 p.1 A discussion of the ongoing test, as part of the IRP process, to determine whether there are TCE level problems should be disclosed.

Note: What is the current level of TCE concentration in the wells? This information should be disclosed.

3-17 p.2 The subsurface contaminant migration of TCE within the aquifer should be analyzed in relation to the direction, contour and rate of flow in relationship to the Portsmouth and Newington water supply.

3-17 p.3 Further discussion is needed as to the carbon function of the water treatment plant which is needed for reduction or elimination of TCE levels during treatment.

3-17 p.4 The "selected metals" which have been found to exceed EPA maximum concentration levels at localized ground water sampling locations should be further identified.

278 - Ground water flow directions were provided in Figure 3-1 of the DEIS. The additional level of detail that you desire in this EIS regarding the description of the base aquifer is not necessary to enable a discussion of environmental consequences of closure. The aquifer under the base is significant in that it is capable of providing a major supply of water. The current level of TCE concentrations in the wells was presented in the first paragraph on page 3-17 of the DEIS. The "selected metals" are iron and arsenic. Detailed results of the sampling can be found in the documents listed in Appendix H. The likelihood of the lead content of the solder used in the piping system causing a water quality problem during reuse will be addressed in the reuse EIS. Refer to responses 52, 189, and 214.

3-17 p.5 Is the lead content of pipes likely to be a problem in reuse of the referenced buildings?

3-18

Notes:

- a. The NPDES permits, if any, associated with surface water drainage discharges from the base should be discussed together with an analysis of the currency of testing by the state and the relationship of contaminant limits to contaminants actually found in current test.

279

279 - The State of New Hampshire does not test the outfalls. Your comment did not appear to recognize the discussion in the first paragraph on page 3-21 of the DEIS.

280 - The bypassed flows are not assessed for contaminants. Toxicity to aquatic life generally is expressed in terms of acute (short term) or chronic (long term) effects. Acute toxicity refers to effects occurring in a short time period often death is the end point. Chronic toxicity refers to effects through an extended period of time and often occurs in a species population rather than in the individual. The text in this paragraph did not identify any "low levels of toxicity." EPA determines the adequacy of NPDES permit parameters.

3-20 §3.7.2 p.1 An assessment should be provided as to the contaminant content of "by passed" waters during "heavy load/heavy rains."

280

3-20 §3.7.2 p.2 Comparison of the term "acutely toxic" and "chronically toxic" should be provided with definition as to significance. What are the current low levels of toxicity?

3-21 p.1 Are the NPDES parameters adequate in relation to current contamination?

3-22 p.1 Further review and information is needed as to the environmental significance of the coastal wetlands and uplands areas. And of the effect, if any, of any of the applicable NPDES permits regarding discharges to Class B waters.

Note: The October 1989 NOAA designation of the Great Bay and adjacent areas as a National Estuarine Research Reserve should be referenced, the associated programs should be discussed as well as the implications of the provisions of the existing Memorandum of Agreement between the State and Department of Defense on the future use of lands adjacent to Great Bay.

281 - The first paragraph on page 3-23 of the DEIS succinctly discussed the environmental significance of the Pease AFB coastal wetlands and uplands. The first paragraph on page 3-21 of the DEIS succinctly discussed the effect of base discharges on receiving waters. Refer to responses 148 and 155 also.

282 - Refer to response 155. The bald eagle habitat and migratory waterfowl habitat are similar in area but are not one and the same. The eagles use shoreline trees for perching and roosting habitat and will prey on weakened waterfowl for food. The "Pease AFB Disposal EIS" is the same as the reuse EIS.

3-23 §3.9 More discussion is needed as to the significance of the "6.5 miles of salt water shoreline and 57 acres of fresh water ponds for fishing", particularly the salt water estuary, and, from a reuse perspective the redevelopment limitations required in the public interest. Have the biological fractures of wildlife and/or plantlife been evaluated for mutations and/or other possible genetic abnormalities?

3-24 §3.9.2 p.3 Further review and information regarding the significance of the tidal coastline and pond to migratory water fowl is needed.

3-25 p.1 The relationship of the Great Bay's eagle habitat and coastline significant to migratory water fowl needs to be further detailed reviewed. Are these areas one and the same?

3-25 p.4 What is the "Pease AFB Disposal EIS"??

283 - Refer to response 99.

3-26 §3.12 p.2 The text is incorrect. The Town of Nowington has 59 acres of the oldest town forest in the State (and the Town is seeking to recover the balance remaining from the Air Force upon closure).

283

3-28 §3.13 Further foundation is needed for the Air Force conclusion there were no indirect biophysical effects which could be attributed to socioeconomic impacts and, in effect, no requirement for the Air Force to forecast socioeconomic consequences.

284

3-29 §5.13.1 Given the long delays anticipated before reuse development can begin, it is virtually certain that dramatic socioeconomic impacts will soon occur and must be extensively discussed in the EIS as referenced in the Parts I and II of these comments.

Note: Although "the effects of closure and reuse are difficult to assess until a reuse is approved.", if the reuse plan must first be approved before the second EIS can be drafted and itself approved, and negotiations to purchase must wait the second EIS, then the economic detriment which the closure caused would not be addressed by the Air Force until well after the locality has struggled to re-established a viable economy without the help the closure act provided for. Compare this reality with "the Air Force is working closely with the OEP to

285

284 - During the preparation of this document, general consideration was given to potential indirect biophysical effects which could be attributed to socioeconomic impacts of base closure. For example, it was not believed that a significant reduction in the area's air pollution problem due to ozone would result from base closing. This is because both direct and indirect effects on traffic are not believed to be significant from an impact area standpoint. Additionally, violation of the ozone standard is believed to be largely the result of the movement of polluted air moving to the New Hampshire seacoast from other east coast sources. For these reasons, a detailed analysis of air pollution, which would require a detailed socioeconomic analysis, was not conducted. No potential socioeconomic-related biophysical impact was investigated in detail because likely impacts were not identified in the Air Force's review and no such relationships were suggested as part of the scoping process.

285 - Your comment is noted. The timing on development of the reuse EIS is discussed in response 1. The Air Force is working with the Office of Economic Adjustment (OEA) to minimize the negative effects of base closure. It is acknowledged that there are limitations on the level of assistance and, therefore, on the ability of both agencies to minimize negative impacts.

minimize any negative effects of base closure." (See

Appendix B-1)

3-31 §3.13.3 The statements that population growth has occurred in the three county area during recent years and is "project to continue" needs further discussion. What is the effect on the projections of the loss of some 9,000 people (?) directly and indirectly attributed to the departure of the Air Force mission? The immediate deep impact to the communities of Newington, Portsmouth, Greenland, Rye, Stratham, and Kittery are diluted by reference to county wide population growth statistics, and more localized analysis is needed.

286

3-47 §3.19 p.5 Further discussion of the railroad spur to the B & M Railroad is needed including a statement of complete ownership and control by the Air Force of necessary easements.

287

286 - Refer to response 77 for discussion of the area's economic downturn. As discussed previously in responses 9 and 102a, socioeconomic impacts are not evaluated in this document. Concerns regarding the level of detail and specificity of the socioeconomic analysis are appropriate topics of the reuse EIS.

287 - Refer to response 249.

Chapter 4 Environmental Consequences

4-1 §4.1 As previously discussed, NEPA requirements should also include the significant environmental effects of the FB-111 departure and a discussion should include the terminal, pipeline, pump facilities, and railroad right-of-way. Otherwise, improper and possibly unlawful "segmentation" has occurred.

The socioeconomic effects are inextricably interrelated and should also be addressed.

288

4-1 §4.2 p.2 The tank farm and pipeline should be discussed included within the "scheduled underground tank removal and remediation."

Note: Further discussion is needed regarding the clean-up of sediment and entrain contaminants along the drainage ways off site.

4-2 p.2 Are the "existing approved disposal sites (which) will be used" presently located "on base" or "off base"? Is there any intention by the Air Force to reactivate or reused old landfill site?

Note:

1. Will facilities being transferred to NHANG be cleaned

288 - Refer to responses 102b, 216, 239, 245, and 249. As stated previously, the Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

up as part of the EPA/IRP process prior to transfer, and, if not, what is known about hazardous materials within the "NHANG Cantonment Area"? Fuel discussion must be included within the EIS.

2. Further discussion of the scope of asbestos and PCB contamination needs to be supplied together with a detailed inventory of locations and amounts of remaining asbestos (whether friable or not) as well as accurate information as to the cost of clean-up and disposal of such substances to the extent that the Air Force plans to transfer the facilities with such substances still in place.

4-2 p.3 Regarding radioactive sources the EIS needs further discussion on the history of nuclear weapons storage, handling and maintenance, a discussion of the investigation as to whether soil resources were contaminated and a description, if needed, of the remediation process. Likewise in the event chemical weapons were found to have been stored or handled.

Note: Further information is needed as to any radioactive substances that may have been used in connection with the base hospital/medical/dental procedures and metallurgical testing procedures.

4-2 p.4 Regarding the reuse by the NHANG, discussion is needed of the related utilities including the heating plant

289 - The existing approved disposal sites which will be used for the disposal of hazardous wastes are located off-base. Old landfills will not be reactivated and reused by the Air Force. IRP investigations covered the entire base including the NHANG cantonment area. None of the IRP sites are located within the NHANG cantonment area. Refer to responses 73 and 165.

290 - Refer to responses 34 and 272. Radioactive substances have not been used in metallurgical testing procedures or in the base hospital in medical and dental procedures.

which will provide heat for the NHANG.

291

Note: The EIS does not describe in sufficient detail the levels of utilities which will be discontinued and those which will be maintained.

291 - Heat will be provided for the NHANG during closure as spelled in the second paragraph of Section 2.2.2 of the DEIS. All utilities will be continued to a level necessary to maintain the salability of the facilities.

292 - Refer to responses 165 and 166.

4-3 p.2 Regarding the statement "nonfriable asbestos, as well as lead-based painted surfaces, will not be disturbed and left in place.", further discussion is needed to deal with the progressed deterioration of base housing, (asbestos containing buildings) which over time, will become friable and lead-based painted services, which over time, will pose a health hazard or the basis for concluding that such deterioration will not occur. Discussion of both State of New Hampshire and Federal "lead paint" regulations must be addressed.

292

Note: Any reuse involving improvements, alterations, or demolition, will require compliance with then existing EPA rules regarding asbestos and lead based paints which will be at least as costly and time consuming as those which are intended to be evaded by the suggestion that "non-friable asbestos, as well as lead-based painted surfaces, will not be disturbed and left in place."

4-3 §4.4 p.1 The terminal and tank farm remediation process and removal of contaminated ground water around the tank farm needs further discussion.

4-3 §4.4 p.2 No where in the EIS is there discussion of the actual ground water flow direction, contours or velocities.

4-3 §4.4 p.3 The five (5) IRP site risk assessments to "be performed within the next three years" and which "will include an environmental safety and transport assessment" including "the potential for off site migration,...direction of movement....and "information of factors that may significantly affect the fate and transport of contaminants released from the site." needs further discussion. Both the actual time table for completion of these assessments and a detailed description of current information is needed for the reuse planning process to understand what areas and size of areas of the base may not be ready for transfer until a date well beyond three years from the present date.

4-4 §4.5 Further discussion is needed of the effect of reduced loading on the waste water treatment system with specific reference to BOD and other elements which will effect waste water quality and the relationship of contaminants to the NPDES permit.

Note: Discussion is needed regarding the potential, if any, for long term release of contaminants that may be entrained and accumulated in sediment along the drainage ways and brooks off-base. Flagstone Brook drains the north end of the aircraft parking apron. Paul's Brook

drains the bulk fuel storage area. Hodgson's Brook drains the eastern portion of the base. Newfields Ditch receives overland flow as well as storm run-off from numerous drains in the industrial shop area and through the base housing area. Grafton Ditch receives storm run off from the southeastern section of the industrial shop and housing areas. (page 3-18) "IRP investigations have found that sediments of Newfields and Grafton ditches contained elevated total organic carbon and lead levels and produced an oily sheen on the water when disturbed during sampling...it is likely that contaminants are confined to sediments." (page 3-20) MacIntire Brook receives run off from most of the runway and air craft parking apron areas. (page 3-20).

4-4 §4.5 p.2 Apparently, down scoping for the waste water treatment plant assumes down scoping of forces by October 1990, and, further discussion is needed to reveal the method by which the NPDS permit standards will be met.

Note: Further discussion should be given regarding the actual plan to maintain the waste treatment plant at minimum operating levels to avoid degradation of the Class B waters of the Piscataqua River.

4-7 §4.8

294 - Refer to responses 172, 207, 215, and 216. Reuse impacts to endangered, threatened, and sensitive species and mitigation of those impacts will be addressed in the reuse EIS.

Note: Regarding endangered, threatened, and sensitive species discussion of the impact must consider reuse and the extent to which sanctuary protection may be needed.

4-8 p.1

Note: The question of impact on visual and aesthetic values must include reuse analysis based upon hypothetical levels and use mix redevelopment plans with reference to existing Federal Law regarding features of the natural environment deserving protection in the public interest.

4-8 §4.10

Note: Regarding historic resources reuse alternatives must be assumed for analysis in order that public interest and applicable federal laws in the protection of historical resources may be understood.

4-8 §4.11 Regarding the effect of reduced employment, the statement "it is anticipated that there will be a transition during closure activities and occupancy by the new owner(s). This should minimize potential loss of jobs." is a gross trivialization. The statement that there is "rapid economic growth being experienced in the area" has been analyzed only in terms of county wide growth with no attention paid to the

295 - Reuse impacts on visual, esthetic, and historic resources will be addressed in the reuse EIS. Refer to response 239 also.

296 - Refer to responses 76, 77, and 239.

297 - The impacts on local government revenues and on area housing of base closure are socioeconomic impacts. As discussed previously, the Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

296

Newington, Portsmouth and other immediately surrounding towns. A detailed analysis of the direct and indirect employment effect is needed. Once again, a paradigm of theoretical assumptions to analyze "reuse" in this EIS, is needed.

Note: Examples of minimal investigation by the Army Corps of Engineers reveal an entirely inadequate information basis to conclude the base closure merely "may adversely effect employment". Further studies about the dramatic impact should be made and analyzed with the information revealed.

4-9 §4.12 The way in which base closure will directly and indirectly affect local government revenues, expenditures and services will be dramatic in the short term. There is no time frame given for the end of environmental clean-up or as to when the Air Force will transfer the property for potential reuse or when redevelopment will begin. It is improper for the EIS to avoid discussion of these dramatic "vacuum" effects left by the departing Air Force.

4-10 p.1

Note: The effect of the elimination of base housing will be dramatic in the short term and a detailed analysis cannot await a Reuse EIS.

4-10 §4.13.1

Note: The Air Force is currently conducting a study as to how many of its civilian personnel and retiring military personnel will leave the area. Information should be provided in the EIS regarding the survey results. Pease distributed 3,200 surveys to active duty personnel 1,610 of which had responded by 1/23/90 and had also sent 450 to 500 surveys to civilian households specifically asking whether the parties intended to remain in the area after the base left, the number of dependents they had and the number school children in the household. What have been the responses to date?

4-11 p.1

298

Note: Any current information regarding a survey of military retirees, or other past or present governmental employees entitled to use, or using, the commissary, base exchange, hospital and like facilities should be provided including a reference to the numbers of retirees likely to move.

4-11 §4.14.1

Note: Disclosure of surveys conducted with retirees and the likelihood and extent of their departure from the

-46-

298 - A survey conducted by Bechtel Corp. for the Pease AFB Redevelopment Commission collected socioeconomic data at Pease AFB. This study is on file at the Pease AFB Base Closure Office and will be utilized for the socioeconomic analysis conducted in conjunction with the reuse EIS as described in Section 4.11, page 4-9.

area should be revealed and discussed. Such socioeconomic information is essential to proper reuse planning.

4-12 p.1

Note: Actual figures should be given regarding the monetary contributions and school enrollment and the impacts over the short term prior to reuse should be analyzed.

299

4-13 p.2

Note: The population growth projection used throughout the EIS do not take improperly disregard the slow down in economic growth in the northeast, New England and specifically the "seacoast" of New Hampshire and southern Maine and the substantial reduction in population, both uninformed and civilian that will accompany the departure of the Air Force from the base.

300

4-15 4.16.4 p.2 Analysis of the loss of radar coverage below 3,000 feet is needed. Local airport owners reported a high degree of probability of a mid-air collision below 3,000 feet once the Air Force radar is withdrawn.

301

Note: Although the EIS recommends that "communities should not use the noise levels projected for base

299 - The indirect impacts to schools due to base closure are socioeconomic impacts. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9.

300 - Refer to responses 77 and 285.

301 - Refer to response 232.

closure conditions as the basis of reevaluating their land use plans and regulations." and state that "the condition does not reflect base reuse which may dramatically effect noise levels in the airfield vicinity." The EIS previously assumed that the base would be used as an airport which should be one of the theoretical redevelopment schemes used to address socioeconomic impact in the current EIS.

302

302 - The noise analysis evaluates the impact of base closure and the realignment of F-111 fighter bomber aircraft. It assumes continued operation of the airport for HANZ purposes as the closure condition. Base reuse for commercial or other airport purposes could greatly increase noise above the level described for closure. Refer to response 212.

303 - The actual content of the statement made by George Kraus is unknown. Appendix H has been added to the EIS and contains a brief description of all IRP sites including Construction Rubble Site 1. An in-depth description of this site can be found in the IRP documents referenced in Appendix H. The only known dumps on the base are described in Appendix H. The Air Force will be conducting another search of the base this spring/summer to ensure all sites are discovered. If you have additional information, it is recommended you forward it to the Base Civil Engineering Office.

PART IV. ADDITIONAL PUBLIC COMMENTARY

A. Following the Public Hearing conducted on January 23, 1990, the Advisory Committee received the following comments:

1. "The Construction Rubble Site Number 1 has a lot more environmental contamination in it than simple construction rubble." This report conflicts with the statement of George Kraus made on January 19, 1990.
2. There are other dumps on south Newington on Pease property that have not yet been publicly identified.
3. There is an area in Newington locally known as "Gundalow Landing" that was reportedly an old ammunition disposal area that has not yet been addressed.

303

B. After the preparation and editing of this document, additional written comments from public interest groups were received. Some of the points raised and some of the comments made are not addressed in the Advisory Committee's response herein, and, accordingly, the Commission is encouraged to give specific consideration to these additional issues.

PART V. CONCLUSION

The Advisory Committee regrets that time constraints may have limited the capacity of the various "interest groups" to provide constructive comment. However, such "groups" may intend to communicate directly to the United States Air Force.

The Advisory Committee will continue to willingly receive public comments and forward some to the Commission as they may be received.

To the extent that the Commission has any questions or may desire further amplification of, or concerning, the comments made in this document, the Advisory Committee invites you to make such inquiries and we will attempt to provide a prompt response.

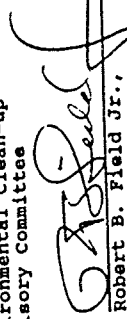
Finally, the Advisory Committee wishes to reserve the right to add to and/or otherwise supplement the within document

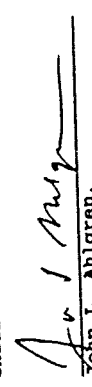
404 - The additional written comments appended to your letter have been specifically considered by the Air Force. Appendix A-1 of your letter presented DEIS review assignment made by a committee of the Pease AFB Redevelopment Commission and a distribution list. Appendix A-2 presented a Notice of Public Hearing for the purpose of providing the public the opportunity to voice concerns regarding hazardous substances, health, and safety at Pease AFB. Although neither appendix contained any specific comments on the DEIS, they have been reproduced for a complete presentation of your letter in the FEIS.

during the period in which the Commission will be preparing the final written response for submission to the Air Force.

Respectfully submitted,

Pease Air Force Base
Redevelopment Commission
Environmental Clean-up
Advisory Committee

By: 
Robert B. Field Jr.,
Chairman

By: 
John L. Ahlgren,
Committee Member

For: G. Bradley Richards,
Vice Chairman
Ann F. Vogelmann
Jeffery W. Ott
Stephen L. Tober, Esquire
John L. Chase and
Bradley M. Lown, Esquire

A-1

MEMORANDUM

TO: Distribution List (Attached)

FROM: Robert B. Field, Jr., Chairman, Environmental
Clean-Up Advisory Committee ("Committee")

RE: Department of Air Force (draft) Environmental
Impact Statement ("EIS") - Closure of Pease Air
Force Base

DATE: January 10, 1990

1. Assignment: On January 9, 1990, the Commission assigned to the Committee the responsibility for coordinating the formulation of a response to the EIS. Such formulation is intended to include the receipt and analysis of comments, suggestions and input from a variety of sources. Your agency, department, City or Town is believed by the Committee to be a party which might desire to make comments.
2. Due Date: Written comments to the EIS are due not later than THURSDAY, FEBRUARY 1, 1990, fourteen (14) days (two (2) weeks) following Thursday, January 18, 1990, the last date of the Public Hearing to be conducted by the Air Force in Newington and Portsmouth. In order to provide adequate lead time to formulate the written response, the Committee requires your comments on or before FRIDAY, JANUARY 26, 1990. Committee Member John J. Ahlgren, Esquire, of Ahlgren, Perrault & Mitchell, 101 Market Street, P.O. Box 1211, Portsmouth, New Hampshire 03801, Telephone (603) 431-4522, FAX (603) 427-5000, is the point of contact for communications.
3. Specific Contacts: The following Committee members are identified as contact persons for specific response classifications:
 - (a) Bradley M. Lown, Esquire, (603) 436-4010:
 - (i) Office of the Attorney General - State of New Hampshire;
 - (ii) Office of the Attorney General - State of Maine; and
 - (iii) Miscellaneous Public Interest Groups to be identified.
 - (b) G. Bradley Richards, Vice Chairman, (603) 926-5200:
 - (i) Department of Environmental Services - State of New Hampshire;
 - (ii) Federal Agencies having jurisdiction; and
 - (iii) Airport Study Advisory Committee.
 - (c) Jeffery W. Ott, (603) 436-7512:
 - (i) City of Portsmouth - Planning Department;

- (ii) City of Portsmouth - City Council;
- (iii) City of Dover - Planning Department;
- (iv) Town of Kittery - Town Council and Planning Department; and
- (v) Town of Elliot - Selectmen and Planning Department.

(d) Stephen L. Tobel, Esquire, (603) 431-1002:

- (i) Town of Newington - Selectmen and Planning Department;
- (ii) Town of Greenland - Selectmen and Planning Department;
- (iii) Town of Rye - Selectmen and Planning Department; and
- (iv) Governmental Relations Advisory Committee.

(e) Ann Vogelmann, (603) 868-5716:

- (i) Town of Durham - Town Council and Planning Department;
- (ii) Natural Resources Protection Advisory Committee; and
- (iii) Facilities Advisory Committee.

(f) John L. Chase, Jr., (603) 436-3557:

- (i) Town of Exeter - Selectmen and Planning Department;
- (ii) Town of Stratham - Selectmen and Planning Department;
- (iii) Town of Newmarket - Selectmen and Planning Department;
- (iv) Town of North Hampton - Selectmen and Planning Department; and
- (v) Rockingham County Regional Planning Commission.

(g) Robert B. Field, Jr., Esquire, (603) 433-2111:

- (i) Economic Development Advisory Committee; and
- (ii) The Bechtel Corporation - Master Planners.

4. Initiative: Committee Members are requested to contact their assigned interest groups at the earliest possible moment and to arrange personal meetings with same as desired by interest groups.

Should you have further comment, please feel at liberty to contact me as necessary.

Respectfully,

Environmental Clean-Up
Advisory Committee

By: 
Robert B. Field, Jr., its Chairman

Attachments:

- (i) Tasking Responsibility Memorandum, George C. Jones, Chairman, dated January 10, 1990
 - (ii) Distribution List
- cc: All Committee Members
Michael F. Farren, Coordinator

DISTRIBUTION LIST

SUBJ:

Memorandum from R. B. Field, Jr.,
Chairman, Environmental Clean-Up Advisory Committee
Re: Air Force Base Redevelopment Commission

1. Office of the Attorney General, New Hampshire
Robert E. Cheney, Esquire
State House Annex
Concord, NH 03301
2. Office of the Attorney General, Maine
James Tierney, Esquire
State House Station 3
Augusta, ME 04333
3. Department of Environmental Services, New Hampshire
Robert W. Jarney, Commissioner
6 Hazen Drive
Concord, NH 03301
4. Federal Aviation Administration
Vincent A. Sciarano, Manager, Airports Division
New England Region
12 New England Executive Park
Burlington, MA 01803
5. U. S. Fish and Wildlife Service
Walter J. Quist
One Gateway Center, Suite 700
Newton Center, MA 02158
6. United States Environmental Protection Agency
Region V
Johanna M. Hunter
J. F. Kennedy Building, R A M
Boston, MA 02203-1211
7. Airport Study Advisory Committee
David L. Richards, Chair
3 Newington Road
Greenland, NH 03801
8. City of Portsmouth
Planning Board
Craig Wheeler, Director
1 Junkins Avenue, P O Box 628
Portsmouth, NH 03801

9. City of Portsmouth
City Council
City Hall
1 Junkins Avenue, P O Box 628
Portsmouth, NH 03801
10. City of Dover
Planning Department
Municipal Building
Dover, NH 03820
11. Town of Kittery
Town Council and Planning Department
Rogers Road, P O Box 808
Kittery, ME 03904
12. Town of Eliot
Selectmen and Planning Department
141 State Road
Eliot, ME 03903
13. Town of Newington
Selectmen and Planning Department
Mimble Hill Road
Newington, NH 03801
14. Town of Greenland
Selectmen and Planning Department
575 Portsmouth Avenue
Greenland, NH 03840
15. Town of Rye
Selectmen and Planning Department
10 Central Road, P O Box 429
Rye, NH 03870
16. Governmental Relations Advisory Committee
Ruth Griffin, Chair
479 Richards Avenue
Portsmouth, NH 03801
17. Town of Durham
Town Council and Planning Department
Durham Town Offices
13-15 Newmarket Road
Durham, NH 03824
18. Natural Resources Protection Advisory Committee
Marion Frink, Chair
251 Little Bay Road
Newington, NH 03801
19. Facilities Advisory Committee
Ted Connors, Chair
P O Box 92
Portsmouth, NH 03801
20. Town of Exeter
Selectmen and Planning Department
10 Front Street
Exeter, NH 03833
21. Town of Stratham
Selectmen and Planning Department
P O Box 115
Stratham, NH 03885
22. Town of Newmarket
Selectmen and Planning Department
Main Street Newmarket
Newmarket, NH 03857
23. Town of North Hampton
Selectmen and Planning Department
P O Box 710
No. Hampton, NH 03862
24. Rockingham County Planning Commission
Clifford Sinnott, Executive Director
121 Water Street
Exeter, NH 03833
25. Strafford Regional Planning Commission
Paul B. Smith, Executive Director
County Court House
County Farm Road
Dover, NH 03820
26. Economic Development Advisory Committee
Carlton P. Morin, Chair
12 Cranfield Street
Newcastle, NH 03854
27. Bechtel Team
John Leigh
T. F. Moran Building
42 A Dover Point Road
Dover, NH 03820
28. Office of State Planning, New Hampshire
David C. Neville
2 1/2 Beacon Street
Concord, NH 03301

29. Fish and Game Department
Donald A. Normandeau, Executive Director
2 Hazen Drive
Concord, NH 03301
30. Department of Transportation, New Hampshire
Wallace E. Stickney, Commissioner
John O. Horton Building
Hazen Drive
Concord, NH 03301
31. Department of Transportation, New Hampshire
Harold Buker, Director of Aeronautics
Concord Municipal Airport
65 Airport Road
Concord, NH 03301
32. New Hampshire Job Training Coordinating Council
Fred L. Gagnon, Chair
913 Elm Street
Manchester, NH 03101
33. Division of Economic Development, New Hampshire
Timothy Winter
Prescott Park, Building 2
164 Loudon Road
Concord, NH 03301
34. Department of Employment Security, New Hampshire
John J. Ratoff, Commissioner
32 S. Main Street
Concord, NH 03301
35. Greater Portsmouth Area Chamber of Commerce
A. Vaughn Sanborn, Chair, Board of Directors
500 Market Street, P O Box 239
Portsmouth, NH 03801
36. Portsmouth Naval Shipyard
Alta Ellis, Director of Resources Management
Code 101
Portsmouth Naval Shipyard, NH 03804-5000
37. Dana Connors, Commissioner
Chair, Governor's Task Force on Closure of PAFB
Department of Transportation, Maine
State House Station 16
Augusta, ME 04333
38. Russell W. Spinney
Deputy Commissioner of Transportation
State House Station 16
Augusta, ME 04333
39. Ronald L. Roy, Director
Department of Transportation
Aeronautics Division
Augusta State Airport
Augusta, ME 04333

Pease Air Force Base Redevelopment Commission

300 GOSLING ROAD, PORTSMOUTH, NEW HAMPSHIRE 03801
TELEPHONE: 603-433-6088 FAX: 603-427-0433

January 9, 1990

Robert B. Field, Jr., Esq.
Chair, Environmental Clean-Up Adv. Cmt.
c/o Sheehan Phinney Bass and Green Prof. Assn.
Suite 325
1 Harbour Place
Portsmouth, NH 03801

Dear Mr. Field,

Pursuant to our discussions, the following are responsibilities assigned to the Environmental Clean-Up Committee relative to the Environmental Impact Statement (EIS):

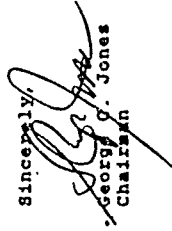
1. Coordinate and draft Commission's responses to the draft EIS;
2. Review all comments submitted to Commission Coordinator or any other Advisory Committee;
3. Meet with representatives of the Attorney General's Office and state environmental agencies to solicit their comments and assistance;
4. Meet with representatives of the Town of Newington and the City of Portsmouth to solicit their comments and assistance;
5. Contact the United States Environmental Protection Agency (EPA) Region I in Boston or any other appropriate federal agency (e.g. United States Fish and Wildlife Service (USFWS)) to solicit their comments and assistance;
6. Present the proposed response of the Commission to the Commission for its review and consideration at least two weeks prior to the deadline for the submission of written comments to the Air Force.

As you will recall from discussion at the January 9 Commission meeting, your committee has also been advised to coordinate with the Bechtel Team to prepare a final report on the EIS, due to the Commission no later than January 29, 1990.

Robert B. Field, Jr., Esq.
Chair, Environmental Clean-Up Adv. Cmt.
January 9, 1990
Page 2

On behalf of the Commission and all concerned, thank you for your continuing hard work and cooperation. If you have any questions or wish to discuss matters further, please call either Mike Farren or myself.

Sincerely,


George G. Jones
Chairman

cc: Michael Farren, Coordinator
Jeffrey Leathe, Vice Chair
John Leigh, Bechtel Team
Advisory Committee Chairs and Vice Chairs

A-2

B-1
RECEIVED JAN 26 1990

LEGAL NOTICE

NOTICE OF PUBLIC HEARING
PURSUANT TO RSA 21-A
PEASE AIR FORCE BASE
REDEVELOPMENT COMMISSION
ENVIRONMENTAL CLEAN-UP
ADVISORY COMMITTEE

"The Environmental Clean-Up Advisory Committee of the Pease Air Force Base Redevelopment Commission will convene a Public Hearing on Tuesday, January 23, 1990, at 7:00 p.m. in the Newington Town Hall, Mible Hill Road, Newington, New Hampshire.

The purpose of the Public Hearing is to provide an opportunity to members of the public to voice concerns and/or comment in writing to the Committee as to:

- (i) the identification and extent of any actual or potentially hazardous substances or wastes and/or other environmentally unsound conditions which may now exist, or which were known to have existed in the past, at Pease Air Force Base;
- (ii) concerns relating to any activities which may have occurred at Pease Air Force Base in the past and which pose or may pose a hazard or threat to the health and/or safety of both military and civilian personnel assigned to or working at Pease Air Force Base;
- (iii) actual or potentially hazardous substances or wastes and/or other environmentally unsound conditions which may have been generated as a result of operations at Pease Air Force Base and which may be present at off-base support facilities or which may have migrated or been discharged to areas off base; and
- (iv) any other activities conducted at Pease Air Force Base of which the public may be aware and which may bear upon the "clean-up" of Pease Air Force Base and its conversion to a facility suitable for non-military uses.

It is the intent of the Committee to preserve confidentiality of any comments identified as being "confidential" to the fullest extent available under law.

Please call the Commission office at (603) 433-6088 for further information."

PEASE AIR FORCE REDEVELOPMENT COMMISSION
ECONOMIC DEVELOPMENT ADVISORY COMMITTEE

To: John J. Ahlgren, Environmental Clean-up Advisory
Committee
From: Carlton P. Morin, Chairman, Economic Development Advisory
Committee
Subject: Air Force draft EIS
Date: January 25, 1989

Attached is the Committee's response to the Air Force's draft of an Environmental Impact Statement concerning the closure of Pease Air Force Base. On the assumption that you will be presenting the Commission with an Executive Summary for the assembled Committee responses, we have appended, as page 6 of our response, several bullet points for your use in so doing.



cc: Committee members
Liaisons from Supporting Agencies to the Commission
Michael Farren, Commission Coordinator
Robert B. Field, Jr., Chairman, Environmental Clean-up
Advisory Committee
John Leigh, Bechtel

13-1

DRAFT
RESPONSE TO
DRAFT ENVIRONMENTAL IMPACT STATEMENT
OF
DEPARTMENT OF THE AIR FORCE

"In accordance with the CEQ regulations for implementing the NEPA, the scoping process was initiated with the publication of a Notice of Intent to prepare an EIS for the closure action in the Federal Register on 8 February 1989. One purpose of the scoping process is to PUBLICLY determine the scope of issues to be addressed. Another purpose of the scoping process is to identify significant environmental issues that will be analyzed in depth." (Para. 1.3, page 1-2) (underscores added).

"The primary objectives of the Commission [Defense Secretary's Commission on Base Realignment and Closure] shall be to: A. Determine...the criteria for realigning and closing bases to include at least...6. The economic impact on the community in which the base to be closed...is located...8. The environmental impact..." (Charter, Defense Secretary's Commission on Base Realignment and Closure)

"An EIS is required to discuss socioeconomic effects only when such effects are interrelated with natural or physical effects." (Para. 3.13, page 3-28)

Query. Is the Air Force out of step with its own interpretation of the "CEQ regulations" as well as being out of step with the Defense Secretary's charge to the Commission on Base Realignment and Closure?

"The Department of Defense should develop an efficient and time-sensitive property disposal strategy...Time is a particularly precious commodity for private investors. When a community has assembled a package that includes private investment, success often depends on getting real-estate matters settled so that redevelopment can proceed...Not every base closure has led to economic recovery." (Chapter 7, Base Realignments and Closures, Report of the Defense Secretary's Commission).

105 - Refer to response 9 with regard as to why all concerns listed were not evaluated. Consideration of the primary objectives of the Defense Secretary's Commission on Base Realignment and Closure are beyond the scope of and are not required in this EIS. Refer to responses 9 and 102a for an explanation of why socioeconomic impacts are not considered in this document. Your comment quoting the base realignments and closures report of the Defense Secretary's Commission is noted.

During the period for public comment, which expired April 11, 1989, several concerns and issues were identified and recognized as such for purposes of scoping the present draft Environmental Impact Statement. Nine out of seventeen of those concerns and issues were economic. Yet, the Air Force adroitly attempts to sidestep the issue with frivolous word play. It "fails" to see the connection with economics that was essentially mandated to all who preceded the Air Force in this closure decision. For instance, on page 4-9 the Air Force states "Base closure may directly or indirectly affect local government revenues, expenditures, and services." (underscores added). And on page 4-8, "Base closure may adversely affect employment in the economic impact area...ANY potential adverse impact should be diminished by the placement of some employees in other Federal jobs, the tight labor market, and the rapid economic growth being experienced in the area." (underscores added).

The implication that the socioeconomic consequences, even if they are necessary to consider, are minor - if they exist at all - contradicts common sense, the current economic crisis in the impact area, and, as well, facts presented by the Air Force itself. Some of the more important of these Air Force facts follow.

Personnel:	Before	After
Active military	3465	0
Dependents	4746	0
Civilian - Federal	537	50
Civilian - Non Fed.	515	0
NHANG - Active	49	85
NHANG - Civil Serv.	220	240
NHANG - State empl.	4	16
Totals	9536	391

"Commissary, base exchange, and hospital will be closed and special access privileges for retirees will terminate." \$15 million, out of a total of \$24 million, commissary sales were to military retirees and their dependents. Similarly with respect to \$8.5 million out of \$17 million of BX sales. Retirees, exclusive of dependents, totalled 14,728, of which 5,121 were Air Force Military retirees.

Champus payments for the fiscal year ended September 30, 1989 totalled \$4,005,735. Supplemental Care Services paid for amounted to an additional \$512,003.

Community involvement in Red Cross activities totalled 21,731 hours. Family service volunteers donated 8,402 hours.

"Two elementary schools located on the base will close because of reduced enrollment and revenue."

"A reduction will also result in the emissions of the Maine Energy Recovery Company incinerator in which 332 tons per month of solid wastes from the base are disposed. The NHANG will continue to generate approximately 8 of the 332 tons of solid wastes per month, however." (Other communities using MERC will have to overcome this revenue loss.)

"...Peace AFB affects the economy and socioeconomic factors in a three-county area...Rockingham and Strafford Counties in New Hampshire and York County in Maine..." (In delineating off base housing, the Air Force states)...1850 rental units and 220 owner occupied units will be affected by the combined realignment and base closure actions..." "Area economic growth has been strong in all important sectors. (These statements are made at a time at which the duration of the present area depression is estimated as in excess of two years; housing starts are at a virtual standstill; housing resales typically take 6-9 months to accomplish; average home prices have declined by an estimated 25% over the last 12 months, and are still declining; several major area and regional banks have reported substantial current year losses from operations, with some either operating under regulatory "cease & desist" orders or under direct Government takeover; emergency budget cuts having been imposed at many towns and cities in New Hampshire, including specifically the City of Portsmouth; a projected negative budget imbalance of \$180 million for the State of New Hampshire; and negative imbalances of similar magnitude in the neighboring States of Maine and Massachusetts.)

306 - Refer to response 9 for a discussion of why not all scoping concerns were evaluated. The Air Force has not determined in this GIS that the socioeconomic consequences are minor or nonexistent. Your comments regarding the length and magnitude of the current economic downturn in the three-state region are noted.

Converting the NHANG to a "stand-alone unit" is contemplated in the report will require construction expenditures totalling \$3.9 million in the period June, 1990 through October, 1991.

The Air Force speaks throughout about a second EIS which will "...help the Air Force in its decision making with respect to disposal and reuse... This study will include (for example) anticipated loss of tax revenues, housing and school impacts, and the loss of employment from base closure as if there were no positive benefits from reuse..." Reuse however will be affected by the nature, extent, and location of pollution, now known or subsequently encountered, on the base. It is fair to say that the existing perception of undiscovered or improperly treated hazardous wastes may well continue its adverse effects on the willingness of industry to relocate on the base. Not only can the cleanup efforts of the Air Force affect timely reuse, the first risk assessment which it must perform and report on is given a three year period in which to occur. Remedial actions would then follow, and planned reuse could be postponed another several years.

In addition to pollution induced delays, the second EIS will likewise have to await a survey for historic or prehistoric archaeological resources. The local redevelopment plan would of course have to be altered to take any survey findings into account and then reviewed by the Air Force. On page 4-3 the Draft EIS states, "Nonfriable asbestos, as well as lead based paint surfaces, will not be disturbed and left in place. These buildings will not cause any significant health hazard to the public." However any reuse involving improvements, alterations, or demolition, will require compliance with then existing EPA rules which will be at least as costly and time consuming as those which are intended to be evaded by the quoted language. The Air Force would do well to heed the lessons learned by its sister Service, the U. S. Navy, in dealing with asbestos "left in place."

308 - Comment noted. Refer to response 1 for discussion of the timing of the reuse EIS. The Office of Economic Adjustment (OEA) is the designated Department of Defense agency for planning and implementing measures to mitigate or reduce adverse effects of base closures and realignments. Your comment is noted. As discussed in response 284, no biophysical interrelationship was identified. The EIS does set forth the proximate consequences of closing Pease AFB.

"The effects of closure and reuse are difficult to assess until a reuse plan is approved" (page 3-29) If the reuse plan must first be approved before the second EIS can be drafted and itself approved, and negotiations to purchase must await the second EIS, then the economic detriment which the closure caused need not be accounted for by the Air Force until when? Until, perhaps, the locality has reestablished a viable economy without the help the Closure Act provided for? But, as stated on page 3-29, "The Air Force is working closely with the OEA to minimize any negative effects of base closure." (underscore added). Better they should work with the local communities.

Lastly, two quotes come to mind which reaffirm both the insensitivity of the Air Force to the economic consequences of the Pease AFB closure, and the dishonesty of their rationale. On pages 4-8&9 it is stated "An analysis of employment impacts will be conducted in the reuse EIS when such impacts can be assessed against new employment opportunities." The statement blithely ignores the economic detriments of time delays necessary for reuse planning, negotiation and sale of the property, and development required before commencement of reuse. With respect to off-base housing, at page 4-9, it is stated "The magnitude and effect of these changes are dependent on base reuse. A reuse alternative...could result in no impact..." Given the Air Force's foot dragging to date, and the years which must intervene before sale negotiations and actual reuse implementation, the deceptiveness becomes apparent.

In short, the claim that there is no interrelationship of socioeconomic and physical effects is a product of word play and not of factual determination. EIS analyses are required to set forth the proximate consequences of a proposed action undiluted by the long term recuperation, to whatever extent, from efforts expended by others.

BULLET POINTS
FOR
EXECUTIVE SUMMARY

..... Process is not acceptable. Government agencies not coordinated and not sensitive to the economic consequences of time delays.

..... Not every base realignment or closure is alike and the Air Force's attempts to treat them as such subjects the first community to the inordinate adverse consequences of time delays, and delays the latter communities with procedures and policies from which deviations will not be permitted.

..... Communities do not have the cadre of "Washington" experts available to the Air Force and the Department of Defense. Nor are they liable to afford any; given the example of the OEA's refusal in this instance, to fund independent analysis or verification of the Air Force's preexisting environmental studies.

..... Support is not found either in law, by regulation, or by precedence, for relegating the economic effects of base closures to a second EIS whose timing and existence is wholly dependent on an affected community's reuse plan; which in turn is dependent upon, a) the assent of the Agency effecting the base closure, and b) the agreement of that same Agency as to the price it shall receive for the properties.

309

309 - Your comment is noted. Refer to responses 1 and 129 regarding coordination and timing of the reuse EIS. The Air Force concurs that not all base closures are alike. The Air Force is doing its best to expedite the necessary studies and steps to effect the closure of Pease AFB and to proceed to base disposal and reuse. Your comments regarding experts and OEA's funding are noted. The Air Force's decision not to do a socioeconomic analysis in the closure EIS was not based on it being relegated to the reuse EIS. As discussed in responses 9 and 102a, it was determined that a socioeconomic analysis was not needed in this document. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

B-2

PEASE AIR FORCE BASE REDEVELOPMENT COMMISSION
Airport Station Advisory Committee

January 24, 1990

FROM: David L. Richards, Chairman
SUBJECT: Comments of Draft EIS, dated December 1989
TO: John Ahlgren, Coordinator, EIS response
We have reviewed the Draft Environmental Impact Statement for the closure of Pease Air Force Base, dated December 1989 and have the following comments at this time.

Sec. 2.2.1, page 2-2, paragraph 3:

Will the Commission receive confirmation, in writing, that the airfield will remain operational during protection and maintenance status?

Sec. 2.2.2, page 2-3, paragraph 2:

Will the Commission receive confirmation, in writing, that the Air Force will support NHANG's needs during the transition?

Sec. 2.2.2, page 2-7, paragraph 2:

What is the timing for the close out of the jet fuel tanks? Inerting the underground jet fuel tanks and then requiring de-inerting will be expensive and possibly impractical. NHANG desires only one of the fuel tanks, Tank #1. It appears the others will be removed or abandoned.

Sec. 3.1.1, page 3-1, paragraph 2:

Captain Earl Pease was a native of Plymouth, NH.

Sec. 3.4.1, page 3-3, paragraph 5:

Are the 22 infield underground tanks usable for the reuse plan?

Sec. 3.4.1, page 3-4, paragraph 1:

What is the cost of repair of tank #2?

Sec 3.4.1, page 3-4, paragraph 2:

What is the current demolition schedule for Tank #3?

310 - The Air Force does not consider it necessary to provide the Pease AFB Redevelopment Commission written confirmation of statements published in an EIS. The temporary closure of the underground jet fuel tanks will occur between 1 October 1990 and 1 April 1991. It is recognized that reuse planning will be occurring during this time period. Consideration will be given to any impracticalities. The second paragraph in Section 4.2 of the DEIS discussed bulk fuel storage tanks 2 and 3.

311 - Portsmouth has been changed to Plymouth in Section 3.1.1 on page 3-1 of the DEIS. The infield underground tanks are usable and will be monitored this year for leaks. An estimated cost of repairing tank 2 is \$300,000. Refer to response 23.

Sec. 3.4.6, page 3-7, paragraph 3:

Date of March 1990 differs from Sec. 4.3, page 4.3, June 1990. What is the correct date?

Sec. 3.10, page 3-25, 2nd full paragraph:

What impact on the upland sandpiper by removal of 22 mid-field underground tanks?

Sec. 3.16.1, page 3-34, Table 3.16.1.1:

No activity report for the golf course.

Sec. 3.18.3, page 3-43:

Totally inadequate! This section does not adequately address the impact of the termination of the approach control radar and the VORTAC.

Pease Approach Control is presently an integral part of the air traffic control system. It provides radar coverage of air traffic in the sector between Boston Approach and Portland Approach up to an altitude of 10,000 feet. The altitude above 10,000 feet is covered by Boston Center radar.

Pease Approach airspace includes the general aviation airports at Hampton and Rochester, New Hampshire and Eliot, Maine. In addition, the airspace includes two major natural flyways, Route 95, which is mentioned in the EIS, and the New Hampshire coastline from Seabrook to Portsmouth.

Both Route 95 and the coastline intersect the final approach course to Runway 34. The coastline intersects the approach course very near to the instrument final approach fix, the point at which approaching aircraft begin their final descent to landing. This descent crosses the coastline at approximately 1500 feet, an altitude that is not uncommon for aircraft to transit the area following the coastline.

Route 95 crosses the final approach course at the instrument approach "middle marker" about 1/2 mile from the end of Runway 34. Generally the transiting aircraft would be above the altitude of arriving aircraft; however, when aircraft are departing Pease on Runway 16 the transiting aircraft are at a prime altitude for collision.

Both Skyhaven and Littlebrook Airpark have approved instrument approaches predicated on the Pease VORTAC. In addition, Littlebrook Airpark has an approved radar approach predicated on the Pease Airport Surveillance

312 - The correct date was March. Section 3.4.6 on page 3-7 and Section 4.3 on page 4-3 have been updated to reflect completion of the survey. The infield underground tanks will not be removed. The tanks will be monitored this year for leaks. The monitoring activities will only cause minor disturbances to the sandpipers. Refer to response 145.

313 - Refer to responses 95 and 232. The VORTAC was not scheduled for decommissioning. It will be operated and maintained by an Air Force contractor following base closure.

Radar (ASR).

Present tentative plans call for Manchester Approach Control to assume the control of traffic upon closure. At this time the minimum altitude for radar coverage by Manchester is 3000 feet. The EIS states at Table 4.16.1-1 that upon closure there will be 100.46 daily operations. Based on the level of operations, the existence of the natural flyways and the apparent inadequate coverage of existing radars it appears that this section of the EIS is inadequate.

Sec. 3.18.4, page 3-43:

See comments to Sec. 3.18.3.

Sec. 3.19, page 3-47:

Falls to include access ramp from the vicinity of base housing to Spaulding turnpike and Route 95.

Sec. 4.2, page 4-1, paragraph 2:

Time table for removal of 22 midfield underground storage tanks. See comments to Sec. 3.4.1 and 3.10.

Sec. 4.8, page 4-7, paragraph 2:

Sec. 3.10 would seem to indicate that the upland sandpiper is in the area of the midfield underground fuel storage tanks. Certainly some impact by removal or inerting of the tanks.

Sec. 4.12.2, page 4-9:

Will the Commission get confirmation in writing?

314 - These ramps have been added to the discussion of transportation in Section 3.19, page 3-48, of the FEIS. Again, the infield underground tanks will not be removed. Activities associated with treating the tanks with caustic solution will only cause minor disturbances to the sandpipers. Base firefighting and rescue capabilities will be maintained during the period between base closure and final disposition by the NHANG. Local cooperation agreements will be required with the agency if the service provided surrounding communities in the past is to be continued. The text in Section 4.12.2, page 4-12, has been changed to reflect this condition. Again, the 71st Force does not consider it necessary to provide the Pease AFB Redevelopment Commission written confirmation of statements published in an EIS.

P.C.
B-3

M E M O R A N D U M

315 - All but two of the comments in this memorandum are identical to the comments received by the Air Force from the Society for the Protection of New Hampshire Forests. Refer to responses 151 through 159.

TO: John Ahlgran, Environmental Clean-up Advisory Committee
FROM: Mary Ellen Boelhower, Natural Resource Protection Advisory Committee *meB*
DATE: January 26, 1990
SUBJECT: Draft Environmental Impact Statement for the Closure of Pease Air Force Base

The following comments are submitted on behalf of the Natural Resource Protection Advisory Committee for inclusion in the Pease Air Force Base Redevelopment Commission's response to the Draft Environmental Impact Statement for the closure of Pease Air Force Base. In addition to providing input to the commission's response, we plan to submit additional comments directly to the Department of the Air Force.

Our comments, as discussed in a January 24, 1990 meeting, are as follows:

3.4.1 Underground and Aboveground Tank Storage (page 3-3)

The locations of the tanks identified in this section should be disclosed, and should be located on a map of the base as appropriate. The map should be cross-referenced to Table 3.4.1-1 (page 3-4).

Why have some tanks been filled with sand or a caustic solution and some tanks left empty? More detail should be provided in this section.

Paragraph two of this section states "If the tanks are returned to service and the caustic solution is determined to be a hazardous waste, it would be appropriately disposed of." By who and how? This statement should be clarified.

Paragraph five of this section states that projects to bring the tanks into compliance with federal and state regulations is underway. "All of these projects are planned for completion prior to the disposal of the installation; however, they are subject to availability of funds..." All work to bring the tanks into compliance with current regulations should be completed prior to property transfer and disposal regardless of funding considerations.

Page 3-4 describes the condition of the above-ground storage tanks, and states that Tank 2 "was found to have an inadequate water sump for removing water". How is the sump inadequate? This statement should be clarified.

3.4.8 Installation Restoration Program (page 3-8 - 3-14)

On page 3-13 the report states "At the Fire Training Area 2, a maximum of 300 tons of drainage ditch soil contaminated with petroleum hydrocarbons will be excavated..." Why a maximum of 300 tons? Has this determined to be the maximum volume contaminated? Additional information should be provided regarding the proposed cleanup activities.

On page 3-14, paragraph five, the report refers to "specific wetland assessments" that will be conducted as part of the Installation Restoration Program activities. What will these wetland assessments involve? What areas will the assessments include? Additional information should be provided regarding the proposed wetland assessments.

3.7.1 Surface Water Features (page 3-18)

Paragraph three in this section refers to the water as "brackish". We assume the word intended was "brackish"; however, the proper terminology for waters in this system is "estuarine".

The same paragraph contains the statement "...food chains in these communities are potentially sensitive to manmade contaminants". Correctly stated, food chains are sensitive to manmade contaminants.

Paragraph five describes a series of "concentrate" check dams - the meaning of this term is unclear and should be clarified.

Page 3-20 of the report contains a description of water treatment to surface runoff prior to its discharge into McIntyre Brook. Is it true that only low flows are routed through an oil/water separator before entering the brook? What happens during periods of high flow? Is the separator by-passed resulting in potential pollution and violation of NPDES permit criteria? More information on this treatment system should be provided.

3.9.1 Plant Resources (page 3-22)

This section is inadequate in its description of plant resources found on Pease Air Force Base. The focus appears to be on commercially valuable timber species, yet the report fails to mention that a large portion of the base has been under a commercial timber management plan since 1971, and commercial timber harvests have occurred on the base. The conwood thinning that is mentioned in this section has been conducted as part of a commercial timber stand improvement program.

No mention was made of any non-commercial plant species in the area. This section should be expanded to describe the wide variety of plants present on the base.

3.9.2 Wetland Resources (page 3-23)

This section is inadequate in its assessment of wetland resources present on the base. The assessment should provide a detailed description of the variety of wetland resources in the area, including not only the saltwater and freshwater wetlands, but the freshwater ponds as well (the ponds are mentioned later in the fisheries section but should be included as a wetland resource).

On page 3-23 the report mentions that NOAA is proposing the designation of the Great Bay as a National Estuarine Research Reserve. The area was officially designated as the Great Bay National Estuarine Research Reserve in October, 1989.

316 - The culvert in the southernmost spillway has been cleaned since the date of your comment. Any overflow of freshwater should not have significantly damaged the salt marsh complex because freshwater normally enters the salt marsh. Section 4.10 on page 4-8 has been updated to reflect preparation of the nomination form.

The third paragraph states that a fish ladder for the migration of fish 'has been identified as a needed fish habitat improvement project'. Where did this recommendation come from? This statement should be clarified.

3.9.2 Wildlife Resources (page 3-24)

3.10 ~~Endangered, Threatened, and Sensitive Species~~ (page 3-24)

The New Hampshire Natural Heritage Inventory is in the process of inventorying rare, threatened or endangered plant and animal species on the base and will provide a report of their findings by June 1990. This survey should be mentioned in this section, and the findings incorporated into this section if timing of the VPIB warrants.

Paragraph two mentions the original Newington town forest as being the first in the state, when in fact this was the first town forest in the country. Almost all of the forest that was acquired by the military remains forested and is managed by base personnel as part of the base timber management program. This section should be revised.

Paragraph two states "Flashboards across the spillways of the ponds, which control the levels of water, will be maintained." The culvert in the southernmost spillway currently does not function properly, and the resulting overflow of freshwater has damaged the saltmarsh complex. This problem should be addressed.

MAN 26 '90 16:58 SOCIETY PROTECTION H. H. FOREST 99

4.10 Historic Resources (page 4-8)

Paragraph two states "...a nomination form will be prepared, if warranted" for the local house and caretaker's house. A nomination form has been prepared.

If you have any questions about our comments, please feel free to contact me at 749-6368.

cc: Natural Resource Protection Advisory Committee:

Harlon Frink
Clayton Panniman
Barbara Hill
Betsy Lyons
Clothilde Struss
Paul Beane

C-1
RECEIVED JAN 26 1990

317 - Refer to responses 148, 155, and 247.



OFFICE OF STATE PLANNING
STATE OF NEW HAMPSHIRE
2 1/4 BEACON STREET - CONCORD 03301
TELEPHONE 603-771-2155

January 24, 1990

John J. Ahlgren, Esq.
Environmental Clean-Up Advisory Committee
Pease Air Force Base Redevelopment Commission
c/o Ahlgren, Perrault & Mitchell
P.O. Box 1211
Portsmouth, New Hampshire 03801

Dear Mr. Ahlgren:

I am writing to transmit comments relative to the Draft Environmental Impact Statement for the Closure of Pease Air Force Base, dated December 1989. Please be advised that the Office of State Planning finds the EIS to be a reasonably comprehensive document describing the "natural and physical effects" of the proposed closure of Pease Air Force Base. Concerning these aspects of the environment, the Office of State Planning is involved in two relevant programs and we offer the following comments in regard to these:

1. In September 1988, the U.S. Department of Commerce (NOAA) approved the New Hampshire Coastal Program and Environmental Impact Statement to include all the tidal portions of New Hampshire's coast. As a federal property, Pease AFB is specifically excluded from the program's boundary and jurisdiction. However, upon closure of the Base and transfer to a non-federal entity, the Coastal Program boundary will likely be altered to include a portion of the Base property adjacent to Great Bay. The Coastal Zone Management Act is mentioned on Page 1-7 of the EIS. However, the NH Coastal Program is not described anywhere in the EIS nor is the potential impact of the Program on Base lands adjacent to Great Bay. We recommend that the Final EIS include such a discussion.
2. In October 1989, NOAA designated Great Bay and adjacent areas as a National Estuarine Research Reserve. The EIS briefly describes this Program on Page 3-23 under Wetland Resources as though it is still in the proposal stages. We recommend that the Final EIS recognize that the Program is already in place and discuss the implications of the provisions of the existing Memorandum of Agreement between the State and the Department of Defense on the future use of lands adjacent to Great Bay.

John J. Ahlgren, Esq.

2

January 26, 1980

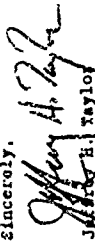
One general and final comment concerning the Draft EIS. We note that all discussion of socioeconomic effects has been omitted and will be the subject of a second EIS. The rationale for this omission (Page 2-28) is that the socioeconomic effects of closure will be more fully known after a community reuse plan is available. We urge that a study be undertaken and completed as soon as possible covering socioeconomic impacts in both the short and long term. As noted in the EIS, this study should include such information as anticipated loss of tax revenues, housing and school impacts, and loss of employment from base closure. Such a study would provide invaluable baseline data for the Redevelopment Commission and others concerned with future use of the Base. We firmly believe that the lack of this information at the present stage of the environmental review process represents a significant flaw in the Draft EIS.

We would appreciate the Redevelopment Commission's consideration of these comments for transmittal to the Department of the Air Force. Should you have questions or desire further information, please don't hesitate to get in touch with me.

JHT/DCN:am

cc: George C. Jones

Sincerely,


Jeffrey H. Taylor
Director

318 - The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

Jan. 26. 90 16:54 P. 02

C-2



WILLIAM E. COLLINS, ACP
Director

244 Central Avenue
Dover, New Hampshire 03820
(603) 742-3551

319 - This same letter was received by the Air Force from the City of Dover.
Refer to responses 128 through 146.

City of Dover, New Hampshire

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

MEMORANDUM

TO: Jeffrey W. Ott,
Environmental Clean-Up Advisory Member
Pease Air Base Redevelopment Commission

FROM: Bruce W. Woodruff, *BW*
City Planner

DATE: January 14, 1990

RE: Environmental Impact Statement (EIS) -
Closure of Pease AFB, NH

The Dover Planning and Community Development Department has reviewed the draft EIS for the closure of Pease Air Force Base, dated December 1989, as submitted by the Department of the Air Force.

The following is an itemized compilation of this Department's comments and suggested input regarding the EIS:

1. Page 1-2, Para 1.2

The description of the location of the closure action appears to be too narrowly defined if one is to assume that the subsequent statement topics attempt to address impacts upon the area triggered by the base closure. It is suggested that the location of closure action include wording that defines the entire metropolitan area that the base has been an integral and interacting part with. This impact statement should follow the established and widely accepted planning policy of studying the entire affected area; namely the Portsmouth-Dover-Rochester, NH - ME Metropolitan Statistical Area (MSA). Please refer to Figure 1, attached.

2. Page 1-7, Para 1.4.4

Executive Order 12372 requires that Federal agencies consult with and solicit comments from local officials whose jurisdictions would be affected by Federal action. We find that the EIS does not provide a listing of affected local jurisdictions anywhere within the text of the EIS. There is no discussion evident that clarifies whether or not the City of Dover would be impacted or affected by the closing of Pease.

The Coastal Zone Management Act indicates that the primary responsibility for planning and regulation of land and water uses rests with the State and local governments. It is suggested the EIS list the local governments that are charged with this responsibility. That list should include all municipalities whose lands include the Coastal Zone around the Great Bay Estuary. It is our feeling that any environmental impact generated by base closure will affect all of Great Bay's Coastal Zones and not just those zones contained within the Portsmouth-Newington communities.

An AICUZ report was prepared for Pease in 1987 and was disseminated to local governments as a guide to implement land use regulation changes that followed recommendations for land development that was compatible with an adjacent military airfield. The land area specified for limited development has been identified as clear zones, APZ I zones, and APZ II zones. This report should account a history of the 1987 AICUZ report dissemination and community response to its receipt. The EIS should outline specific actions taken by each city and town that has AICUZ zones within their boundaries.

3. Page 2-1, Para 2.1

During the July to September 1990 time period, the 509 Munitions Maintenance Squadron will be inactivated. The EIS does not address the immediate, short-term effects on transportation (proposed munitions routing and schedule), bomb clear zones, and the environment regarding the Weapons Storage Area.

The final EIS should cover the final disposition of the 157th Air Refueling Group of the New Hampshire Air National Guard (NHANG). It is now known that some kind of airport use will be allowed, and that the 157th NHANG will not be forced to relocate to other facilities.

4. Page 2-2, Para 2.2.1

What is the projected timetable for disposal of excess real property and related personal property after the inactivation of the 509 CSG on 1 April 1991? This report should also include factors that would effect the timetable projection.

5. Page 2-8, Para 2.2.4

This section states that the DOD OEA has initiated economic adjustment assistance "to communities located near Pease AFB". It further explains that economic adjustment "is a process by which organization, planning and resources are joined to maintain or restore community stability". The obvious question raised by this section is why will this assistance be required? This draft EIS does not even begin to address potential socio-economic impacts either in the area directly adjacent to Pease or in the metropolitan region. These projected socio-economic impacts must be included if only to explain why economic adjustment assistance is being actively considered by DOD.

It is equally important that a list of affected "communities located near Pease AFB" be included here. The authority tasked with identifying such communities and the rationale for inclusion in the list must also be addressed.

The draft EIS was not specific in defining what kind of economic adjustment assistance that the "area" would receive. The OEA coordination plan and the specific steps for assistance should be in the final version of this EIS.

6. Page 3-14, Para 3.5

The draft EIS quantifies air pollution sources and the percentage of emission types that account for each source. One potential source, however, is not included in the report. The present status and closure disposition of DOD's Waste-to-Energy Plant should be included. Particulate and gaseous emission figures should also be highlighted.

7. Page 3-16, Para 3.7.1

Figures should be provided to support the statement that water quality has reportedly been degraded in tributary rivers feeding Great Bay Estuary because of ongoing industrial and municipal discharges upstream from the base. Research should be included

It is suggested that the Final EIS include recent traffic volume statistics from count stations located on the Spaulding Turnpike and I-95. These traffic counts can be obtained from either NHDOT or the Rockingham and Strafford Regional Planning Commissions. Valid conclusions could then be drawn from the raw data to support statements made in the draft EIS.

There are five pertinent points regarding transportation that bear further investigation. They are:

1. The timetable for overpass construction at the Spaulding - Gosling intersection facility should be included in this report.
2. Seasons of the year other than the summer period should be closely looked at regarding heavy weekend and holiday traffic volumes on the Spaulding Turnpike. (i.e. the fall leave-watching phenomenon)
3. Specific traffic problem areas that must be addressed by this report are the Exit 6N/6W/Dover Point Toll Booth facility and the Gosling/Spaulding facility. Levels of Service, turn direction ratios, average daily traffic volume, and the number of available travel lanes on the General Sullivan Bridge should be quantified and included in the Final EIS.
4. The Draft EIS states that a major renovation of the base's railroad spur track would be required prior to any use. The report does not clarify whether or not this action is projected for the base closure process.
5. The State's third highest volume of daily traffic has been recorded by NHDOT between Rout 4 and the General Sullivan Bridge on the Spaulding Turnpike.

12. Page 4-2, Para 4.3

There is no mention in the Air Quality Resources section concerning the currently inactive waste-to-energy plant. The impact of the start-up or continuing inactivity of this facility should be addressed in the Final EIS.

13. Page 4-8, Para 4.11

It is the strong feeling of the Dover Planning Department that:

1. Because of a number of variables involved in determining both base closure and subsequent reuse, short term negative economic and employment impact will occur in the Portsmouth-Dover-Rochester Metropolitan Statistical Area.
2. Any new employment opportunities of major import may be several years away.
3. Closure impacts on the housing market north of the base must be assessed for the interim period between closure and reuse.

Therefore, it is strongly suggested that major impacts from the base closure on employment, housing and the economy will occur during the interim period between base closure and reuse. An analysis of interim period impacts can be determined without benefit of reuse plans. This analysis must be included in this report for it to be utilized as a viable tool for mitigation against adverse impacts to the MSA.

A projected schedule for research, compilation and publication of the Re-use EIS should be included in this report. It is conceivable that Post-Peace development may draw upon existing commercial and industrial uses in place to the North of the base. It is also probable that Dover and other northern sections in the MSA may bear the brunt of an intensified housing needs market in the Peace redevelopment atmosphere because of housing/land availability, housing cost, and relative accessibility to the new employment region. Access to a schedule for the Re-use document and an ability to actively participate in the preparation process will be a large step forward toward avoiding adverse impacts.

14. Page 4-10, Para 4.14

This section should include an analysis of the impact on the area in general and on resident retirees and dependents specifically. Simply announcing a facility termination action along with a supposition that facility users could be closer to alternative bases skirts the issue of ascertaining the effects of the action taken.

15. PAGE 4-11, PARA 4.1.5

The Pease, AFR Golf Course represents a significant amount of land area adjacent to the base. The Draft EIS does not address the disposition of this recreational land use. Potential courses of action regarding the land and its present use may have differing types and varying degrees of economic and recreational service impact on the MSA. This specific recreational use should be addressed in detail because of the location and area of land involved.

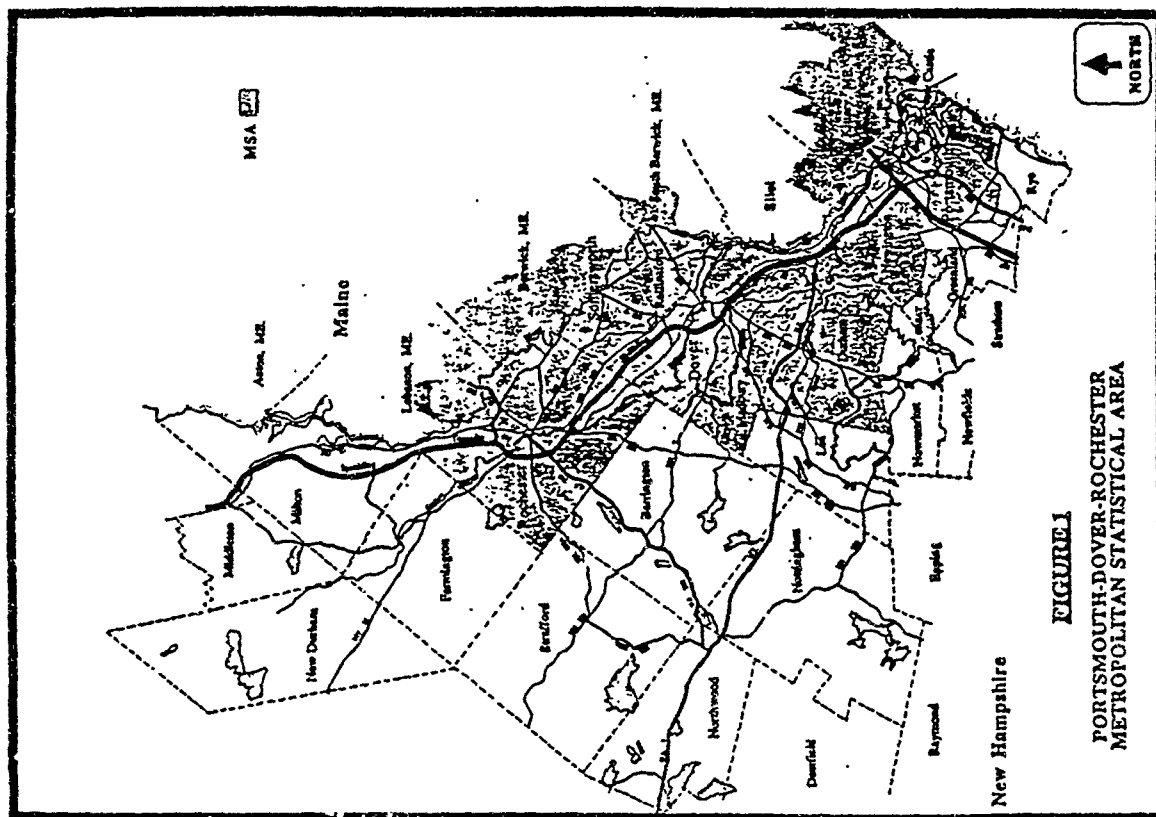
16. PAGE 5-2, PARA 5.1.3

Local officials in cities such as Dover, Somersworth and Rochester, which are located in the MSA, were not contacted or asked to provide information during the preparation of the Draft EIS. It is suggested that these local governments be considered for participation in the preparation of the Final Closure EIS and in the preparation of the Re-use EIS.

If you have any questions or wish to discuss these comments further, please do not hesitate to call my office.

BWV/jcc

Attachments



TRANSMITTED FROM

01.29.90 16:32 P.02

6-3(i)

Rockingham Planning Commission

121 Water Street, Exeter, N.H. 03833 (603) 778-0885

January 26, 1990

Dr. Hugh Stirtes
HQ SAC/DEV
Offutt AFB, NE 68113-5001

RE: DRAFT EIS, CLOSURE OF PEAKE AIR FORCE BASE

Dear Dr. Stirtes:

We are in receipt of the Draft Environmental Impact Statement for the Closure of Pease AFB. A special subcommittee of the Rockingham Planning Commission was created to review this and subsequent Environmental Impact Statements relative to Pease. On behalf of the committee, I am submitting the following comments for your consideration:

General

The Draft EIS (DEIS) is well organized, clearly written but seriously incomplete. Our major complaint is the lack of adequate documentation of existing conditions and consequences, pertaining to hazardous waste sites, hydrological conditions, and socioeconomic impacts. Given the fact that the study of alternatives in this EIS is limited by the provisions of the Base Closure Act, the main function and value of the EIS is to document existing conditions and to assess the impacts of closure on those conditions. The EIS falls seriously short in this regard.

The Draft EIS specifically assigns socioeconomic analyses to the second "re-use" EIS. We believe socioeconomic impacts of the closure itself is a major concern and should be adequately addressed in this report. This is particularly important since it is likely that the base closure will pre-date its redevelopment by a considerable period.

Section 1.2 Location

Pease AFB also abuts the Town of Greenland.

Section 1.3 Scoping Process

Paragraph 3 suggests that all concerns relative to closure will be addressed in this EIS and that identified concerns relevant to base disposition will be addressed in both this and a separate EIS. In fact, many of the scoping issues listed pertaining to socioeconomic factors are not addressed in any meaningful way in the DEIS. It is not correct to assume that all socioeconomic impacts are associated primarily with the re-use of the base.

320 - This same letter was received by the Air Force from the Rockingham Planning Commission. Refer to responses 111 through 125.

in particular, short term socioeconomic effects will be related primarily to the closure itself.

Section 1.4 Relevant Statutes and Regulations

Local regulations are not discussed. Certainly the resumption of local zoning authority subsequent to the base closure is an important consideration.

Also, the Federal Estuarine Research Reserve program is not mentioned but should be since the Great Bay was recently designated as a National Estuarine Research Reserve.

Section 2.1

Introduction

The third paragraph references a "separate environmental impact document" but no further information is given. What is its title, purpose, scope? Who prepared it? What is its relationship to this DEIS?

Section 2.2

Detailed Description of Closure

This provides the best, most complete description of the closure process available to date to the general public.

Section 2.2.2

NEANG Unit

Regarding discussion of JP-7 & JP-4 fuel storage conversions, fuel lines, etc., a map showing their location should be provided.

Section 3.2

General Description

It is essential in evaluating environmental impacts to include basic maps of the physical features of the base, including topography, surface water, soils, road/utilities, facilities, and land cover. None of these maps are included in the Draft EIS. Without them it is difficult to understand the relationship between existing environmental hazards and the resources they may impact.

Section 3.4

Hazardous Materials and Solid Waste

Some of our most serious concerns pertain to this section. The narrative section describing fuel storage facilities, hazardous materials handling and their composition is very good and appears comprehensive. It suffers significantly, however, from the lack of maps showing the location of fuel tanks and waste generation sites, or any cross reference to a listing of tanks and sites describing their disposition during closure.

Section 3.4.1 Underground and Above Ground Tank Storage

An annotated map should be included showing the location of storage tanks (above and below ground tanks), keyed to an inventory of those tanks.

Section 3.4.2 Hazardous Materials/Waste Storage

This section is incomplete in several respects. There is no map showing all suspected sites (only one is provided which shows only very generally the location of the five Expedited Remedial Action Sites). There is no characterization of the non-expedited remedial action sites. The status of the other sites studied by Roy F. Weston during Phase II of the investigation is not completely clear. Where are these sites? What do we know about them? We suggest incorporating relevant portions of the Weston studies into the DEIS. This is among the most important and relevant information that could be included in the document.

Section 3.6

Groundwater

The information presented here would be greatly enhanced if it included a map showing the aquifer location in relation to wells, fuel storage facilities and waste sites. Again pertinent excerpts from the Weston report should be incorporated here.

Section 3.7

Surface Water

The map provided does not show the relevant drainage pattern. A topographic map showing perennial streams should be included.

Section 3.8.2

Wetland Resources

This section should be updated to reflect the fact that designation of the Great Bay as an Estuarine Research Reserve has already been accomplished.

Section 3.13

Socioeconomics

The first two sentences reflect an overly narrow interpretation of the NEPA statute (see 1508.14 - Human Environment" of the NEPA statute). Even so, following the stated rationale, it can be easily demonstrated that natural and physical environmental effects of closure are interrelated to socioeconomic consequences. The effects of the disposition of hazardous waste sites is one obvious example.

We believe strongly, as stated earlier, that the socioeconomic consequences of closure should be addressed in this EIS. One compelling reason to do so is that those consequences will be experienced before the base is redeveloped to a significant extent.

01.20.90 10:32 P.06

TRANSMITTED FROM

Dr. Hugh Stairs
Pease DEIS
Page 5

Regardless of what the ultimate reuse may be, the region will have to contend with the short-term effects of loss of employment, tax revenue loss, increased vacancy rate for housing (a positive impact), loss of labor force, etc. These effects should be quantified to a reasonable extent in this EIS.

The inclusion of a site map keyed to each listed "location of accumulation" would make this inventory much more useful.

Appendix B

As a final note, I would like to comment that, despite its significant flaws (mostly omissions), the Draft EIS is very well written and is one of the most readable documents of its kind I have recently encountered. The authors should be commended for their efforts in producing a concise, accessible document, rather than one which "blinds with bulk".

Our sincere hope and expectation is that the various omissions and errors pointed out here and by other reviewers will be addressed in the final EIS. If this agency can be of any assistance in this regard please do not hesitate to contact us.

Sincerely,

Cliff Sinnott
Cliff Sinnott
Executive Director

CS:slp

cc: George Jones, Chairman Pease AFB Redevelopment Commission
Peggy Lanson, Chairman, Newington Board of Selectmen
Calvin Canner, Portsmouth City Manager
Robert Varney, Commissioner, NHDES

01.20.90 10:32 P.05

TRANSMITTED FROM

Dr. Hugh Stairs
Pease DEIS
Page 4

Clearly it is true that certain socioeconomic impacts are attributed to the closure of the base while others are associated primarily with its redevelopment. We believe that, at a minimum, the closure impacts should be addressed in this EIS. The data generated from such a study would be of significant value to the redevelopment effort. More importantly, it would enable the communities and organizations to gauge and anticipate the short term effects of closure on the region's economy, labor force, housing, health care, etc.

The data that is presented on the area's economy, population, employment is helpful and well presented, but doesn't go far enough.

Section 4.2

Soil Resources

This section refers to consequences that are far beyond the scope of "soil resources". Specifically, impacts relative to underground tank removal and hazardous waste removal are discussed (though not fully assessed). While it is true that these will affect soils, their importance is related to impacts on groundwater and public health. The same comment applies to the discussion of the removal and transport of radioactive sources. Why this appears under "Soils" is unclear; whether this issue can be adequately addressed in one sentence is doubtful.

We suggest that a new Chapter 4 section be added called "Public Health" in which these items are more fully addressed.

Section 4.4

Groundwater Resources

The statement in the first paragraph "...all hazardous materials and hazardous wastes will be removed during closure of the base", is probably incorrect. As we understand it, under the forthcoming interagency agreement, certain locations identified for remedial action will be excluded from the base property transfer. All indications are that they will not be cleaned up before closure of the base.

No discussion is included about the consequences of the changes in fuel storage configuration which was described in detail in Chapter 3 (removal, abandonment, etc.). This is a significant omission and should be addressed.

Sections 4.11, 4.12, 4.13

Considering the near certainty that the base closure/realignment will be completed before substantial economic redevelopment of the property occurs, the short-term consequences of closure on employment, government revenues and housing should have been addressed. (Recall from the author's own statement in paragraph 2, section 4.1 that "...Both short-term and long-term effects are relevant ...").

SHEEHAN, PHINNEY, BASS & GREEN, PROF. ASS'N
1000 ELM STREET
P. O. BOX 3701
MANCHESTER, NEW HAMPSHIRE 03108-3701

PLEASE REPLY TO
OUR PORTSMOUTH OFFICE
January 31, 1990

WILLIAM L. PHINNEY
(603-888-0300)

JOHN J. SHEEHAN
PERKINS BASS
JOSEPH F. DEWAN
COUNSELL

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George C. Jones, Chairman
Peace Air Force Base Redevelopment Commission
300 Gosling Road
Newington, New Hampshire 03801

Re: Environmental Clean-Up Advisory Committee
Draft Response to Environmental Impact
Statement (Closure) ("Response")

Dear Chairman Jones:

Pursuant to the Committee's Transmittal Letter and
Response, dated January 29, 1990, enclosed please find
Addendum Number One to such "Response". As indicated, the
Committee will continue to forward supplementary information
to the Commission as it is received.

Respectfully,

Robert B. Field, Jr.

RBF/bam

Enclosure

cc: Michael F. Farren, Coordinator
John L. Ahlgren, Esquire

C-3(i)

01.29.90 13:51 P.02

TRANSMITTED FROM

321 - The list of landfill and construction-rubble dump contents is noted.

LAND FILL AND CONSTRUCTION RUBBLE DUMP CONTENTS

- LF - 1 - Municipal refuse, wood, inert debris.
- LF - 2 - Municipal refuse, wood, inert debris.
- LF - 3 - No evidence of land fill, supposedly had been municipal/industrial, but can find no evidence of same.
- LF - 4 - Barrels of waste being removed. Results of barrel contents, not back yet. Supposedly industrial and solid waste, plus solvents, etc.
- LF - 5 - Solvents, thinner, municipal waste.

321

Construction Rubble #1 - Asphalt, concrete, gravel plus some TCE. one thing is that it is runoff from fire training area #2.

Construction Rubble #2 - Asphalt, concrete, gravel.

Source: 19 January 1990, George Kraus, Chief Engineer, FAEB.

ENVIRONMENTAL CLEAN-UP ADVISORY COMMITTEE

RESPONSE TO UNITED STATES AIR FORCE

ENVIRONMENTAL IMPACT STATEMENT (CLOSURE)

PEASE AIR FORCE BASE

TO THE PEASE AIR FORCE BASE

REDEVELOPMENT COMMISSION

JANUARY 29, 1990

ADDENDUM NUMBER 111

JANUARY 31, 1990

The Pease Air Force Base Redevelopment Commission, Environmental Clean-Up Advisory Committee ("Committee"), submits the following information to the Pease Air Force Base Redevelopment Commission ("Commission") as a supplement to its initial submission dated January 29, 1990; and, such information is intended to be integrated into and become an integral part of such submission.

I. Additional Observations Impacting the Draft Environmental Impact Statement (Closure) ("EIS") -

- (a) Corps of Engineers - As the contractor engaged by the United States Air Force, the Corps of Engineers (Mr. Minor, (402) 221-3135) located in Omaha, Nebraska, reports "... to his knowledge, this [the Pease EIS preparation] was the first time he and/or the Corps of Engineers had been involved in a bifurcated (closure/reuse) EIS process. He further stated that the Air Force had mandated the process." (Emphasis supplied). The Committee submits that such admission provides additional support to the proposition that the EIS procedural structure is seriously "flawed"; and, further, suggests that the Commission has a reasonable basis to challenge the Air Force premise that "bifurcation" (and/or trifurcation, if the FB-111 "EA" is included) meets the substantive requirements of NEPA and the B-3a Closure Act (Exhibit 1).

- (b) The Bechtel Corporation Scope of Work (as amended December 1, 1989) - Bearing on the EIS review capacity of the Commission is the seriousness of the changes to the Bechtel Scope of Work reflected in the December 1, 1989, Amendment. The Committee

322 - This is the first base closure EIS that the Omaha District Corps of Engineers has become involved in. This is primarily because few base closures have recently occurred and still fewer base closures have occurred since enactment of NEPA. The Omaha District is now involved in four base closures. Refer to responses 223 and 245.

notes: Bechtel is no longer contracted to (a) identify Additional Sites [hazardous waste sites] and make recommendations to the Commission for additional evaluation and site analysis (p. 38); or (b) identify and evaluate any additional cleanup tasks not proposed by the Air Force which would be required to accommodate a given land use proposal (p. 72).

The Committee is very concerned that these essential tasks will be overlooked or, possibly bypassed, until a point in time that may place the Commission in a disadvantaged position. We emphatically suggest that the Commission direct Bechtel to engage some other independent engineering contractor to assess the Pease site and sites ancillary or supporting thereto.

Q. What was the rationale that allowed such a substantial and harmful contractual change to occur and what is the Commission planning to do to correct same?

II. Additional Comments Received by the Committee (copies attached):

- (a) State of New Hampshire
Department of Transportation (1/26/90)
- (b) State of New Hampshire
Office of the Attorney General (1/29/90)

Respectfully submitted,

PEASE AIR FORCE BASE
ENVIRONMENTAL CLEAN-UP
ADVISORY COMMITTEE

By  Robert B. Field, Jr.,
its Chairman

REB/baw

Exhibit 1

Attachments:

- (i) Department of Transportation
- (ii) Office of the Attorney General

Bechtel

MEMO

TO: Mike Farren
Peace Development Commission

FROM: John Leigh
Bechtel

SUBJ: Environmental Committee info requests regarding
Precedent EIS bifurcation and Comparative EIS drafts

DATE: January 29, 1990

On January 29, 1990 I contacted the Corps of Engineers in Omaha, Nebraska by phone. I spoke with a Mr. Miner at (402) 221-3135. Mr. Miner stated he was familiar with the PAFS DEIS and that he had been involved with its preparation.

When queried, Mr. Miner stated explicitly that, to his knowledge, this was the first time he and/or the Corps of Engineers had been involved in a bifurcated (closure/reuse) EIS process. He further stated that the Air Force had mandated this process.

As per another request of the Environmental Clean-up Advisory Committee, I have provided you with copies of the Closure EIS drafts prepared for Norton AFB and Chanute AFB. Please forward them to the Environment Clean-up Advisory Committee.

FILED



The State of New Hampshire RECEIVED JAN 31 1990
Department of Transportation
John O. Morton Building

Wallace E. Smith, Jr.
Commissioner

Warren Brier
P.O. Box 483
Manchester, N.H. 03102-0483

January 26, 1990

John J. Ahlgren
Ahlgren, Perrault & Mitchell
101 Market Street
PO Box 1711
Portsmouth, NH 03801

Dear Mr. Ahlgren,

The New Hampshire Department of Transportation has reviewed the Draft Environmental Impact Statement for the closure of Pease Air Force Base prepared by the Department of the Air Force, and we offer the following comments.

Page 4-18 of the document appropriately notes the need for coordination between the Air Force and the New Hampshire Department of Transportation during the moving operation. This coordination must take place early in the move so that we have adequate time to put appropriate provisions in our construction contract for the new interchange at the Spaulding Turnpike and Gosling Road.

Throughout the document reference is made to the airfield remaining operational during the protection and maintenance status, that time frame between the base closure and the final disposal for reuse. To what degree will the airport be kept operational? Will the entire airport be kept operational or just the ramp, taxiways and runway supporting the Air National Guard? This question applies primarily to snow plowing, mowing and ramp maintenance.

The EIS discusses the fuel tanks and the plans for the Air National Guard contingent fuel supplies. During the interim transition between closure and final reuse are there any plans for fuel storage and or a fuel supply system to support interim civilian aviation activities?

Paragraph 3.18.4 Air Traffic Safety, page 3-46, line six, we believe the reference to "Pease Control Tower" to be in error. The reference should be to Pease radar approach control (RAPCON) or approach/departure control. Aircraft operating at the civilian airfields in the vicinity and outside the airport traffic area do not have to contact the Pease Control Tower. It is the RAPCON and not the control tower that is the critical factor in providing area wide traffic separation within the seacoast area.

324 - Comment noted.

325 - The airport will be kept operational at a level sufficient to support the NHANG. Following base closure, the base will be maintained by a private firm under contract with the Air Force. The contracting procedures are in a preliminary stage during time of publication of this EIS. The preliminary scope of work calls for snow and ice removal to allow operation. Snow and ice removal responsibilities would include the runway and necessary streets and parking lots. Special snow removal equipment would remain at the airport following closure to allow for snow removal from the runway without damaging the porous friction surface. Grass would be moved and maintained at a height between 8 and 12 inches in the airfield area. Operational facilities, facilities requiring preservation, and vacant facilities requiring a lower level of preservation would have an appropriate level of lawn maintenance and snow removal. For the highest level of maintenance, which would be for operation facilities, lawn maintenance would include edging, trimming, and shrub and hedge maintenance. The contractor would also be responsible for maintaining the airfield pavement with the exception of the NHANG parking ramp. This includes the runway, runway overruns, taxiways, runway and taxiway shoulders, and the parking ramp south of the NHANG ramp. Base roads and parking lots will also be maintained in a useable condition.

326 - There are no plans at this time to store fuel to support interim civilian aviation activities.

Page 2
January 26, 1990

John J. Ahlgren
Ahlgren, Pertault & Mitchell

327 - Refer to response 95.

The loss of radar coverage with the closure of Pease Air Force Base and the departure of the assigned radar approach control personnel and equipment are not addressed in the draft document. This could have a serious and potentially tragic consequence to airspace utilization in the seacoast area.

This office would strongly urge that, as a minimum, interim measures be established to provide radar coverage capability equal to that now in place until the Federal Aviation Administration can install and operate a surveillance/approach radar system.

Any degradation of existing radar capability in the seacoast area would result in potentially unsafe conditions.

Sincerely,

Wallace E. Stickney

Wallace E. Stickney
Commissioner

WES/RWC/snb

MEMORANDUM

TO: Pease Redevelopment Commission
Environmental Compliance Advisory Committee

FROM: Robert P. Cheney *RLC*
Associate Attorney General

Geoffrey M. Huntington *GMH*
Assistant Attorney General

DATE: January 29, 1990

RE: Comments on Draft EIS for Closure of Pease Air Force Base

Based on our review of the December Draft Environmental Impact Statement examining the closure of Pease Air Force Base, we offer the comments which follow. Part I simply addresses the text of the draft EIS, while Part II compares the draft to the Redevelopment Commission's Scoping Document Comments.

PART I - REVIEW OF DRAFT EIS TEXT

-p.3-3. Note that the study states that the planned project to bring underground storage tanks into compliance with federal and state laws is "subject to availability of funds". The EIS should identify the minimum level of funding necessary to achieve timely compliance with UST requirements.

-p.3-4. The conclusion reached on the bottom of this page states that "The environmental impact of all 277 releases [of diesel fuel and/or jet fuel] was considered insignificant due to quick clean-up responses." It is unclear what information was relied on

to support the conclusion that the environmental impact of these releases is "insignificant" and what regulatory agency, if any, deemed the releases "insignificant." Furthermore, there is no indication as to whether the conclusion that the releases were "insignificant" refers to the cumulative effect of all releases or the significance of each individual release of fuel in the site area.

-Section 3.4 generally. Even though referred to in Section 4.1, Section 3.4 does not mention the various piping that is associated with the underground and aboveground storage tanks that are at issue. Recall that the Commission's Scoping Document Comments indicated that the piping network was significant and might require remedial action in addition to that which must be undertaken for the 156 underground storage tanks. [There should be more discussion of the integrity of the piping and the Air Force's plans for testing and monitoring of the piping] in Section 3.4.1 of the EIS.

-p. 3-5. The hazardous waste materials and hazardous waste storage Section 3.4.2 is premised on the basic assumption that Pease Air Force Base is currently operating in full compliance with all state and federal RCRA requirements relating to storage and disposal. If this is the Air Force position, it should be stated affirmatively by the Air Force.

329 - Refer to response 22. The statement regarding the environmental impact of all 277 releases that are being considered as insignificant because of the quick cleanup response was in the context of cumulative (additive) effects for 1993. The Air Force deemed the releases as insignificant.

330 - The various piping that is associated with the aboveground and underground storage tanks is pressure-tested on an annual basis. Every 5 years, the piping is hydrostatically pressure-tested at twice the normal pressure for a period of 4 hours. When leaks are detected, the deteriorated pipe is replaced. The majority of the piping is in good shape; however, leaks have been developing recently where the piping penetrates through valve pit retaining walls. All known leaks detected during the closure period will be repaired.

331 - An affirmative statement has been added to Section 3.4.2 on page 3-5 of the FEIS.

-p.3-7. Section 3.4.6, Asbestos, draws no conclusion as to the impact of asbestos which may or may not be determined to be present in various buildings by a survey due for completion in March 1990. This survey and its results should be incorporated into this EIS. Also, there is no discussion of likelihood of further deterioration of asbestos in base buildings during the period of base closure preceding final disposal for reuse or of Air Force efforts to monitor and remediate any further deterioration during this period.

332

-p. 3-10. The top paragraph on this page mentions negotiation of an agreement with EPA and the State of New Hampshire which will specify future procedures for all IRP activities. Associated with this agreement, and in addition to the issues raised on pp. 3-8 through 3-14, is the impact on closure which the timing of remediation of the identified sites may have. In other words, on what time schedule will remediation proceed, and what is the significance of that scheduling to the closure of the base? Will closure of the base have any impact on anticipated funding for investigation and remedial work? Is closure of the base and departure of base personnel and residents likely to increase human, authorized or unauthorized, or animal contact with waste sites at the base? Does the Air Force intend to secure waste sites with fencing upon closure?

333

332 - Refer to responses 165 and 312. The survey established the location of all asbestos on the base. It is not necessary to publish such detailed information in an EIS.

333 - Refer to responses 40 and 96.

-p. 3-18. Surface Water Features, and Wastewaters at p. 3-20. The EIS should state whether the Air Force has identified all potential sources of surface water discharges both natural and man-made from the base and whether those discharges requiring a permit are in compliance and likely to remain in compliance in the future. All point source discharges both permitted and unpermitted, if any, need to be inventoried and the source of flows identified.

-p. 4.3. Section 4.4 Groundwater Resources, begins with a note that "Because current operations have not been identified as sources of contamination, this impact [a reduction of the potential for accidental release of hazardous materials resulting from closure], although beneficial, is not considered significant." While it was appropriate for the drafters to determine that a reduction in the potential for accidental releases of hazardous materials resulting from closure of the base constitutes neither a significant nor a positive impact, it is unclear whether the State of New Hampshire would agree without more investigation that "current operations have not been identified as sources of contamination." Where is the data on which this assumption is premised?

-p. 4-3. The last paragraph Section 4.4 notes that the remedial investigations/feasibility study of the five IRP sites will consider the potential for off-site migration of contaminants via

334 - Section 3.7 of the DEIS identified all sources of flow and surface water discharges from the base. The base is in compliance with its NPDES-permitted outfalls as was discussed in Section 3.7.2 of the DEIS. The base intends to maintain compliance with its NPDES permit throughout closure.

335 - The reduction in the potential for accidental releases of hazardous materials and wastes was considered to be an insignificant and positive (beneficial) impact in the discussion in the text. Refer to response 49 also.

groundwater aquifers. There is no statement, however, that the IRP study will identify off-site migration trends which would, in fact, constitute "significant environmental consequences" resulting from the closure of the base. In other words, the drafters have simply noted that off-site migration of contaminants via groundwater may be impacted as a result of closure, but that the extent of those impacts are unknown and thus are not being recognized as potentially significant in this draft EIS. It seems that there should be a discussion of the Air Force response to any information following base closure that off-site migration contaminants has occurred.

"P. 4-4. Section 4.5, Surface Water Resources, fails to address potential impacts to surface waters as a result of closure operations associated with shutting down various components of the base. For example, removal and clean-up of stored hazardous waste chemicals, removal of underground storage tanks, dismantling and cleaning of equipment with chemical solvents may be associated with base closure and the potential for impact to surface waters should be addressed.

It remains unclear whether it is appropriate for the drafters to defer assessment of various impacts until such time as the second EIS on reuse of the facility is produced. The purpose of an Environmental Impact Statement is to provide a discussion of both the full range of impacts that may reasonably follow as a

336 - Refer to responses 44, 122, and 266.

337 - The fourth paragraph in Section 4.2 of the DEIS discussed the removal of hazardous materials and waste and the cleaning of storage facilities and any contaminated equipment. Removal and cleaning will be conducted responsibly. Impacts to soil resources and surface waters are not expected to occur. Underground storage tanks will also be removed in a responsible manner and in accordance with applicable regulations.

consequence of the proposed action, and all reasonable alternatives to the proposed action. If closure will result in some category of impacts which cannot be specifically quantified at this juncture, then a spectrum of potential impacts should be addressed ranging from the least significant impact which is reasonably foreseeable to an analysis of the potential worse case scenario with regard to the category of impact being examined. To simply note that such impacts are possible, but then conclude that analysis is not relevant because it cannot be quantified at this time, vitiates the EIS process itself.

338 - Your comment does not identify the specific consequences of concern. No impacts were simply noted as being possible, and no conclusions were made "that analysis is not relevant because it cannot be quantified at this time." Refer to responses 171 and 222 also.

PART II - DRAFT EIS COVERAGE OF COMMISSION'S SCOPING COMMENTS

In April, 1989, the Pease Redevelopment Commission submitted its Comments Concerning the Scope of the EIS for Pease Air Force Base Closure. As part of that submission various categories of issues were set forth, each of which contained enumerated sub-issues, for the draft EIS to address in order to have an adequate scope/coverage. The following comments relate to the adequacy of the scope of the December 1989 draft EIS in light of the issues identified by the Redevelopment Commission last spring. Because the format of the current draft EIS sets forth "Affected Environment" in Chapter 3 separate from its treatment in Chapter 4 of "Environmental Consequences", we have organized the following comments according to the format used in the Redevelopment Commission's Scoping Comments.

A. Solid and Hazardous Waste Issues

1. While Chapter 3 of the draft EIS discusses at length the five sites recommended for expedited remedial action by the IRP process, there is only passing mention of the other fifteen sites, thirteen of which have been recommended by the IRP program for further investigation which will be completed sometime early in 1990. At a minimum the EIS should reference more specifically the IRP information it is basing its impact assessments on. For example, what reports or analytical data is the Air Force relying on to draw its conclusions about impact.

2. The Commission's scoping recommendations were quite thorough, and we can find no portion of the draft EIS which addresses Recommendation Nos. 3, 4, 5a-e, and 7. Chapter 4, which in the only portion of the draft EIS relating to the environmental consequences of closure, only briefly addresses the potential for five of the twenty-two IRP sites to result in off site migration of contaminants. There is no discussion concerning the possible extent and nature of site contamination at these or the other sites, nor concerning impacts on the timing, jurisdiction, methods, or costs of closing current operations at the air force base in a manner consistent with producing a clean site in this regard. The

339 - The ground water resources impact assessment has been expanded and the specific IRP information upon which it was based is referenced in Section 4.4 on page 4-3 in the FEIS. Your four referenced scoping recommendations were: assess the impact of the IRP on the reuse of the base; address the requirements of CERCLA relating to transfers of property containing hazardous waste sites; assess the demolition of outside structures; and identify the responsible agency and funding source for bringing the base into compliance with hazardous and solid waste laws. The first and second referenced recommendations are within the scope of the reuse EIS. There are no closure actions involving the demolition of outside structures. The Air Force will remain responsible for bringing the base into compliance with hazardous and solid waste laws. The base will be evaluated with other Air Force bases for cleanup monies as if it were still an active base. The known extent and nature of contamination at the five sites recommended for expedited remedial action was presented in the DEIS in Section 3.4.8. These 5 sites and 15 other sites are still undergoing further investigation. It is not known what other two sites your comment makes reference to. The IRP assures that hazardous waste contamination is identified, controlled, and remediated. Nothing must be done as part of the closure action. Refer to response 96 also.

Redevelopment Commission's Scope Comments were aimed at these discrete aspects of closure; i.e. what must be done as part of the closure action to assure that hazardous waste contamination has been identified, controlled, and perhaps remediated.

3. Several of the Redevelopment Commission's Scoping Comments concerned generation and disposal of solid waste, as well as cleanup of existing solid waste sites on base. Section 4.2 of the draft EIS addresses only the anticipated amount of solid waste which will be generated as part of closure of the base and at times subsequent to closure. The draft EIS fails to identify and assess any of the points raised by the Commission's comments regarding the scope of demolition of outside structures which may be conducted as part of closure, and the costs associated with the removal and disposal of debris.

B. Appendix B Hazardous Wastes and their Past Locations of Accumulation

-We are unable to assess the adequacy of the list comprising Appendix B as there is no indication of either the source of the data, or the parameters which determined the manner in which it was collected. Nor is there an indication of the scope of the materials which are included.

340 - The EIS does not address any demolition of outside structures because no such demolition will be conducted as a closure activity. The scheduled demolition of bulk fuel storage tank 3 will not be affected by base closure.

341 - The Base Civil Engineering Office is the source of the data in Appendix B. The data were collected from hazardous waste disposal manifests.

C. Aboveground and Underground Storage Tank Issues

1. The first scope recommendations made by the Redevelopment Commission relating to storage tank issues was that an inventory of all aboveground and underground storage tanks be conducted. Appendix A of the draft EIS contains such an inventory, but as with Appendix B, the underlying foundation upon which the collection of this data is premised remains unclear thereby raising concerns as to its completeness and/or focus on aspects appropriate to the pending closure of Pease Air Force Base. In addition, and perhaps more important, the document comprising Appendix A is dated August 1, 1985, with no indication as to whether it has been updated or confirmed before being included into the draft EIS. Also, it is unclear whether the list includes all UST's on base or just all regulated UST's.

2. The draft EIS contains no inventory of piping and pipeline components associated with current or past aboveground and underground storage tanks as requested in the Redevelopment Commission's Scope Recommendation No. 3, at p.6. Section 3 of the draft EIS fails to even mention the pipeline and associated components, and Section 4 addresses "associated piping systems" in a single sentence pertaining to the protection and maintenance of underground storage tank systems which will be temporarily out of service as a result of closure.

342 - Refer to response 24. Appendix A is not an inventory of storage tanks. During the week of 26 March 1990, Pease AFB sent a detailed inventory of the storage tanks to James Chilton, HTA Companies, which is in association with Bechtel Corporation, in the preparation of a Pease AFB Comprehensive Redevelopment Plan for the Pease AFB Redevelopment Commission.

343 - Refer to response 330. Section 3.4.1 of the DEIS did state that the piping systems are the same age and made of the same materials as the tanks.

3. The draft EIS contains no discussion or comment on soil and/or groundwater contamination associated with the integrity of underground storage tanks and/or associated piping and pipeline components. See No. 4, Redevelopment Commission Recommendations, p.6.

4. The draft EIS fails to address any of the issues raised in the Redevelopment Commission's Scoping Recommendation Nos. 5, 6 and 7. These three recommendations generally requested that the draft EIS identify the economic impact of closure, the systems as well as the cost of closure and removal, and an identification of the agency and funding source responsible for implementing such a program so that upon closure of Pease Air Force Base all issues pertaining to above ground and underground storage tanks have been, or are being, addressed.

D. Wetlands Issues

1. Redevelopment Commission Scoping Recommendation No. 1 for this issue area related to conducting a full inventory to identify all fresh water and coastal wetlands and drainage areas. Section 3.0.2 of the draft EIS addresses wetland resources in two short paragraphs which refer to a 1982 study conducted by the Soil Conservation Service which identifies

344 - Any soil or ground water contamination associated with the underground storage tanks and related piping is being addressed by the FRP. Refer to response 19.

300 acres of the base area as "wetlands". The draft EIS also cites the proposed 300 acre National Estuarine Research Reserve.

The current draft contains no inventory of wetlands associated with the air base. Furthermore, the document is devoid of any qualitative assessment of the nature and type of existing wetlands based on the State's prime wetlands criteria set forth at Wt. 701 or the National Estuarine Research Reserve criteria.

2. Besides the lack of wetland inventory, the EIS has no discussion of existing structures, excavations, or fills occurring in the existing wetland areas. Nor is there any assessment of the areas and patterns of drainage of surface waters and runoffs supplying/contaminating the existing wetlands. Obviously, if the draft EIS fails to inventory an entire resource category, it cannot possibly assess the impacts of closure of the air base on that particular resource. Section 4.6, therefore, fails to even mention potential impacts or environmental consequences which may result to the significant wetland resources of the area as a result of closure of the air base, eg whether there will be any cleanup during demobilization that will result in excessive or harmful surface runoffs.

3. The draft EIS provides little data or discussion relating to the subject of endangered species and/or plant resources. There is no indication that a Habitat Evaluation Procedure (HEP) was conducted to assess the diversity of fauna and wildlife species, nor did the draft EIS conduct a species and habitat evaluation of all undeveloped lands of the air base to assess the extent of this resource category. In fairness, it may well be that this specific recommendation proposed by the Redevelopment Commission's Comments is more appropriately addressed in the EIS pertaining to reuse of the air base once it is closed, but the current draft quite plainly fails to even address the Commission's comments by making such a statement. Also, the EIS fails to consider this issue in the context of possible increased public access, authorized or unauthorized, to the base following closure.

346 - The New Hampshire Fish and Game Department and the U.S. Department of the Interior have found the discussions adequate. Refer to comments 148 and 408. Plant and wildlife discussions will be expanded in the reuse EIS commensurate with the degree of impacts to plant and wildlife resources.

347 - The Corps of Engineers extensively coordinated with the New Hampshire State Historic Preservation Officer (SHPO) in the preparation of the DEIS. Also, a copy of the DEIS was provided to the New Hampshire SHPO for comment. No comments were received. It is assumed the New Hampshire SHPO has found the DEIS adequate.

2. Land Use And Groundwater Issues

1. Our review indicates that the draft EIS Section 3.12 adequately addresses the scope recommendations made by the Redevelopment Commission relating to the natural heritage inventory and criteria of the State Historic Preservation Office. Obviously, these offices should closely review the substance of the conclusions made in this section.

2. Current recreational uses of the base were summarily addressed, but the EIS lacks the benefit of a full inventory of the potential recreational opportunities offered by various portions of the air base.

3. Perhaps the most important portion of the Redevelopment Commission's Scoping Comments pertaining to groundwater relate to an inventory, mapping and assessment of the quality of groundwater aquifers underlying the air base. Section 3.6 and 4.4 of the draft EIS address this area and the issue of TCE contamination, but the sections contain nothing close to a "complete inventory mapping and assessment" of this resource. With respect to TCE levels, the draft contains nothing beyond a summary of the 1982 report and of sampling results from specific wells dated from 1987 to 1989.

4. Draft EIS p.3-3 contains a statement that "existing TCE levels in the base water supply are considered to be such that TCE treatment is not required." Other than this statement, the draft EIS contains no assessment of what measures may be necessary to restore the water quality of the aquifer, nor the cost and timeframe for doing so. Such action should be unrelated to the selected reuse of the base.

348 - The analysis of base closure did not require an inventory of potential recreational opportunities on base. Such an analysis is beyond the scope of this study. It would be an appropriate consideration in the reuse EIS.

349 - Refer to response 278.

350 - TCE levels in the base water supply wells have steadily declined from the mid-1970's when the initial problem was identified. Since January 1986, TCE levels in those wells have been below State and Federal drinking water standards (maximum contaminant levels). Remediation of contaminated ground water at other locations on-base and off-base will be accomplished in accordance with State and Federal guidelines pursuant to the Intersagency Agreement with EPA and the State of New Hampshire.

5. In addressing the Commission's recommendations pertaining to reduced water usage on base after closure, the draft EIS concludes that there is little indication that the zone of influence in the current aquifers will be affected by closure of the base, but that the issue will continue to be studied by the IRP process with results to be reported at a later date. See Section 4.4. Once again, an EIS can not simply refer to an ongoing study as the sum total of its discussion of potential impacts which will result to a particular resource category as a result of the proposed action. The EIS should identify specifically the data it relies on for its conclusion and should discuss the analysis underlying its conclusion.

6. We saw no discussion or inventory of present subsurface wastewater disposal systems at the base, or an assessment of their impact on groundwater quality by the draft EIS. See Redevelopment Commission's Scoping Recommendation No. 5, p. 11.

F. Public Health Issues

1. The draft EIS does address the first three issues cited in the Redevelopment Commission's public health category: asbestos, radiological materials, and contamination

351 - Refer to responses 171 and 222.

352 - Your scoping comment suggested a discussion of present and former septic systems and leach fields on base and their impact on ground water quality. There are six subsurface wastewater disposal systems on the base. These are located at and serve the weapons storage area, jet engine test cell, water treatment plant, front gate, Sportsman's Club, and golf course clubhouse. There are five wells in the same general area as these disposal systems. All of the wells are checked monthly to ensure conformance with state water quality standards. No fecal coliform or total coliform bacteria standard violations or problems have ever been identified.

from use or spills of pesticides and herbicides. Whether or not the substantive manner in which these areas are addressed is adequate should be looked at closely by individuals familiar with each of these categories of comment. The treatment of closure related impacts on asbestos abatement and removal projects is cursory, and its underlying assumptions should be scrutinized.

2. There is no inventory of storage areas of potential sources of PCB or TCE contaminants, and the only discussion of TCE contamination in the EIS relates to levels found in drinking water supplies. See p. 3-17. Again, the existence, or the lack thereof, of TCE or PCB contamination at various sites around the base would seem to be relevant to the base closure considerations which this EIS is supposed to address. In this area as well as in the areas of lead contamination in the water supply distribution system and the use of lead-based paints, the scope of the draft is adequate, but the substantive discussion of the issues is not.

G. Socio-Economic Issues

The Redevelopment Commission's Scoping Document Comments identified four sub-issues which the draft EIS should address with respect to the socio-economic category. The sub-issues

353 - Your comments are noted. Refer to response 165.

354 - Refer to responses 51, 73, 189, and 273. There are no known sites on base that are contaminated with PCB's.

identified were employment issues, implications of closure on all categories on existing federal grants, impact of closure on the region's housing and rental market, and the impact of closure on availability of services to area military retirees. The draft EIS addresses each of these four areas, but close scrutiny should be given as to the adequacy of the substantive discussion of impacts of closure.

Frequently, the draft EIS leaves treatment of specific sub-issues to the next stage of the process and the "reuse" EIS which will be conducted. For example, Section 4.11 relating to employment states that:

"Because the alternatives for reuse of the base and their effects on employment have not been determined, the effect on employment cannot be determined at this time. An analysis of employment impacts will be conducted in the reuse EIS when such impact can be assessed against new employment opportunities."

Perhaps this is a legitimate position for the drafters of this closure EIS to take. Yet, the alternative to limiting the focus of the closure EIS is to examine a spectrum of impacts which may reasonably occur as a result of the proposed closure, including a worse case scenario. We believe the latter best meets the statutory mandate of NEPA. Certainly other areas have experienced closure of a military

base, and the drafters of this EIS could examine similarities and/or projected impacts based on this pre-existing data base and other similar studies conducted across the country.

H. Infrastructure Issues

1. Waste Water Treatment Facility. The draft EIS does assess impacts that may be associated with reduction of the operational capacity of the wastewater treatment plant as a result of closure. It does not, however, assess the other four issues cited on p. 17 of the Redevelopment Commission's Scoping Document Comments. The Air Force's plan for phase down of the wastewater treatment plant and potential wastewater quality changes referenced in p. 4-4 should be included as part of the EIS.

2. Central Heating Facility. Neither Section 3 nor Section 4 of the draft EIS mentions or addresses any impacts of closure on the central heating facility as identified in the Redevelopment Commission's Comments at p. 17.

3. Electrical Service Grid. Neither Section 3 nor Section 4 of the draft EIS mentions or addresses any impact of closure on the electrical service grid as identified in the Redevelopment Commission's Comments at p. 17.

356 - The five items in your wastewater treatment facility scoping comment were: locations of permitted outfalls; condition, necessary capital improvements, and flow capacity of the facility; sludge volume and location; costs associated with rerouting a part of the wastewater system to Newington; and surface water drainage adequacy, location, design, and permit compliance. Those items that were relevant to closure were addressed to the level of detail necessary in Sections 3.4.7 and 3.7 for a determination of environmental consequences in Chapter 4. Necessary capital improvements to the facility and costs associated with rerouting part of the system are reuse items. Refer to response 207.

357 - The Pease AFB Redevelopment Commission scoping letter referenced in the comment identified issues and made recommendations concerning study efforts. With regard to an analysis of base infrastructure, many of the issues and recommendations made were beyond the scope of study necessary for base closure analysis purposes. Generally, they were more suitable for consideration with reuse. Issues raised in the scoping letter regarding the central heating facility concerned the following: operational conditions, necessary capital improvements, detailed annual operating costs and requirements, assessment of the heating pipe network, impacts of aboveground piping on future land development, and the costs of conversion to individual service for structures and elimination of the central facility and piping. Study recommendations provided on page 17 of the scoping letter elaborated on the issues and recommended an analysis of present and future costs for operation, capital improvement, and modification of the system. None of these issues relate to the environmental impact of base closure. The cost of operation and maintenance to another agency, the need for scheduled capital improvements, the cost of converting facilities to accommodate reuse, and the effect of surface piping on land development are all reuse issues and are beyond the scope of this study. Similar studies were suggested for the electrical service grid. An assessment of whether the current electrical grid system may be transferred for operation to a public or private utility and whether capital improvements are needed to facilitate such a transfer or to service commercial and industrial redevelopment are clearly reuse issues and are not suitable for consideration in this document. In regard to drinking water, an assessment of the water supply and distribution system was suggested on page 20 of the Commission's letter. The assessment would include consideration of operation and maintenance, capital improvements, and water quality. No environmental effect is foreseen due to any operational changes of these facilities due to closure. For this reason, consideration of these issues is beyond the scope of this analysis. The Air Force is responsible for the maintenance of the water supply system between base closure and reuse.

4. Drinking Water Supply System. Section 3.6 and Section

4.4 address the source areas of drinking water for the base.

There is no mention in the draft EIS, however, of the

drinking water supply system as a component of the

infrastructure of the base itself as set forth in the

Commission's Comments at p. 20.

5. Section 3.14.1 addresses the school buildings which exist on the air base, and Section 4.12.1 cites the impact of

base closure as limited to closure and mothballing of the

Brackett & Jones Elementary Schools located on the base.

There is no assessment of the impact of base closure on the

"school impact aid formula" and/or on existing contracts for

school personnel. Nor has an assessment been done concerning

the capital cost of maintenance expenditures for upgrading

and operating the current structures as schools in the

future.

6. Generally, the introduction to Section 4.12 does state

that base reuse will offset many of the impacts on local

government revenues, expenditures and services, and that an

analysis of the offsetting impacts of reuse will be conducted

as part of the re-use EIS. This applies equally to other

issues raised by the Redevelopment Commission Scoping

358 - The "school impact aid formula" and existing contracts for school personnel were not considered because they relate to socioeconomic impacts which are not considered in the closure EIS. Refer to responses 9 and 102a for elaboration. The cost for maintaining, upgrading, and operating current structures as schools in the future are reuse issues and are beyond the scope of this study. It is noted that the school department of the city of Portsmouth may choose to continue operations of the Jones Elementary School.

359 - Comment noted.

Comments such as the impacts of commercial operation of the air field subsequent to closure, and impacts to local zoning and regional fire fighting support, as well as to natural gas storage and delivery systems.

I. Housing Issues

1. The draft EIS certainly addresses population growth issues, and impacts of closure on the area economy, but nowhere is there specific discussion of the impact of closure on multi and single family residential units located on base property, or in the local real estate market. There is also no inventory of the existing residential unit stock on base and its compliance or noncompliance with FAA regulations.

2. Neither is mention made in the draft EIS as to whether specific residential units will be demolished as part of base closure. Certainly this closure EIS should contain a full assessment of this resource category, and potential liability, which are associated with the air base which is to be closed. Again, however, the Commission must scrutinize how much of the evaluation of these resources should be saved for discussion by the reuse EIS which will look at various alternatives for disposition of the base.

360 - Base housing will be maintained by a contractor to preserve its economic value and should not significantly deteriorate as a result of base closure. The contract is in a preliminary stage at this time. The preliminary scope of work calls for the preservation of the housing by maintaining weather tightness, providing heating to prevent interior deterioration, draining water lines, and winterizing sewer traps to avoid freezing. Limited grounds maintenance is also called for. Impacts to off-base housing are socioeconomic impacts that are not considered in this document for reasons stated in responses 9 and 102a. The number of residential units on base was presented in Section 4.13.1, page 4-10, of the DEIS. A detailed inventory of existing residential stock on base is not necessary for this EIS. Compliance of existing base housing with FAA regulations is a reuse issue and is beyond the scope of this analysis. There are no plans to demolish specific residential units as part of base closure.

J. Conclusion

The draft EIS fails to address numerous issues raised in the Redevelopment Commission's Scoping Comments. In addition, many of the areas which are addressed, are done so in a conclusory manner without the benefit of adequate data or examination of reasonably foreseeable alternatives and ensuing impacts. Without a full inventory and assessment of the existing resources and their condition/status, the impacts of base closure cannot be assessed and the foundation of the "Reuse EIS" alternatives analysis will be severely weakened.

If you have any comments or questions, please contact Assistant Attorney General Geoffrey M. Huntington at 271-3679.

361 - The DEIS addressed all closure related issues to a level of detail commensurate with the degree of impact. The reuse EIS will address numerous issues to a different level of detail commensurate with the degree of reuse impacts, which will require the discussion of several existing resources to be considerably expanded. A presentation of reasonably foreseeable reuse alternatives and ensuing impacts was not appropriate for this EIS.

STATE OF NEW HAMPSHIRE

INTER-DEPARTMENT COMMUNICATION

January 29, 1990

Dept. of Environmental Svcs
Waste Management Division

Ken Marschner
Administrator
Waste Management Compliance Bureau

DATE 1-29/90

AT OFFICE

SUBJECT Pease AFB EIS Review

TO
Carl Baxter
Administrator
Waste Management Engineering Bureau

367 - Past and current locations of accumulated wastes were presented in Appendix B. The appendix lists storage site building numbers. If the payment of generator fees to the Hazardous Waste Cleanup fund is determined to be a valid obligation of the U.S. Air Force, it will be paid.

368 - Refer to responses 33 and 312. The statement in Section 3.4.7 that all utilized landfills are known by the Base Civil Engineering Office to be appropriately permitted was in error and has been corrected in the EIS on page 3-8. Because the Air Force contracts require the utilized landfills to be appropriately permitted, it is assumed they are. Maintaining a list of landfills utilized by contractors is not known to be requirement.

I have reviewed certain portions of the EIS which relate to regulatory matters associated with hazardous and solid waste.

Section 3.4.2, Hazardous Materials and Hazardous Waste Storage, page 3-5 is accurate as written, but limited in depth in explaining the number of locations where hazardous waste is stored on the base. At present, the Waste Management Compliance Bureau perceives Pease AFB to be in compliance with hazardous waste regulations and will be monitoring their continued compliance as the base closes.

One outstanding issue which has not been resolved is past payment of generator fees to the Hazardous Waste Cleanup fund. Anne Renner has been in communication with base legal staff, but to date the Air Force has been unresponsive to WMD's request for payment.

Section 3.4.3, Pesticide and Herbicide Usage is not a WMD issue, nor Section 3.4.4, Radioactive Materials, or Section 3.4.5, Lead-Based Paints.

Section 3.4.6, Asbestos may be a concern because in the third paragraph of the section "... to date, approximately 65% of the base buildings have been surveyed." Obviously, this survey should be 100% complete before any base closure occurs.

Section 3.4.7, Solid Wastes Disposal does not specifically mention which permitted landfills are being used by the base. Instead, the EIS eludes to the fact that Base Civil Engineering Office "knows the names." The landfill names should be stated. Also, any sludge created by the wastewater treatment plant which is high in cadmium levels should not be comingled with composting material to reduce cadmium levels. This sludge should have been removed from the base for proper disposal upon removal from the wastewater lagoons.

Section 3.4.8, Installation Restoration Program is not considered to be the WMCB's review responsibility and therefore is not commented upon.

502BW

DEPARTMENT OF THE AIR FORCE
WASHINGTON DC 20330-1000



1130190

The Honorable Warren E. Rudman
United States Senate
Washington, D. C. 20510-0001

Dear Senator Rudman:

This is in response to your joint letter of October 23, 1989, with other Members of the New Hampshire Congressional Delegation to the Secretary of the Air Force regarding asbestos removal at Pease Air Force Base, New Hampshire. We regret that it has taken so long to respond, but it was necessary to assess all aspects of the asbestos issue and establish an Air Force policy for all closing bases, not just for Pease. We found that existing policies were inadequate to respond to the many legitimate issues raised by your letter.

Initial indications are that many buildings on Pease Air Force Base contain asbestos as part of their wall, ceiling and pipe insulation, floor tiles, etc. Collectively, these are known as "asbestos containing building materials" (ACBM). The condition of the ACBM varies. Some contain stable, non-friable asbestos which is satisfactorily accomplishing its intended purpose, but there also is exposed "friable" asbestos (i.e., capable of crumbling under hand pressure and releasing asbestos fibers to the breathing environment). Exposed friable asbestos potentially presents a health hazard and must be remediated for protection of both Air Force personnel and the public.

The complete Air Force policy, "Management of Asbestos at Closing Air Force Bases," is attached for your information.

Highlights are as follows:

- The judgment of health professionals concerning the hazard level of asbestos in a building is the primary determinant whether it will be removed, encapsulated or left alone.
- Asbestos will be removed if required for the protection of human health in the judgment of health professionals; if the building is intended to be used as a school, child care facility, or hospital; or if removal of otherwise safe asbestos prior to disposal would enhance the salability or price of the building.

Appraisal instructions, advertisements for sale, and deeds will contain accurate descriptions of the asbestos present, so that all parties can make informed economic judgments about a building.

The final Air Force determination regarding asbestos will depend on the plan for disposal and any reuse of the building, taking both the community reuse plan and the economic analysis of removal options into account. Asbestos disposal will be analyzed in the Disposal/Reuse Environmental Impact Statement and included in the Record of Decision.

We believe this policy effectively balances the interests of the Air Force, the affected community, and the public. The asbestos surveys at Pease are in the final stages of completion. We anticipate passing our results to the Reuse Commission prior to March 30, 1990.

I appreciate your interest in this matter and hope the information provided is helpful. A similar letter is being provided to the other Members of the New Hampshire Congressional Delegation.

Sincerely,

James F. Edgright
Deputy Assistant Secretary of the Air Force
(Installations)

AIR FORCE POLICY Management of Asbestos at Closing Bases

INTRODUCTION

Asbestos in building facilities is managed because of potential adverse human health effects. Asbestos must be removed or controlled if it is in a location and condition that constitutes a health hazard or a potential health hazard, or it is otherwise required by law (e.g., schools). The hazard determination must be made by a health professional (in the case of the Air Force, a Bioclimatological Engineer) trained to make such determinations. While removal is a remedy, in many cases management alternatives (such as encapsulation within the building) are acceptable and cost-effective methods of dealing with asbestos. The keys to dealing with asbestos are knowing its location and condition and having a management plan to prevent asbestos containing materials that continue to serve their intended purpose from becoming a health hazard. There is no alternative to management of such serviceable asbestos containing materials, because society does not have the resources to remove and dispose of all asbestos in all buildings in the United States. Most asbestos is not now nor will it become a health hazard if it is properly managed.

There are no laws applicable to the five closure bases that specifically mandate the removal or management of asbestos in buildings, other than the law addressing asbestos in schools (P.L. 99-519). Statutory or regulatory requirements that result in removal or remediation of asbestos are based on human exposure or the potential for human exposure (e.g., National Emission Standards for Hazardous Air Pollutants (NESHAPs) - no visible emissions; OSHA - 1..number.. of airborne fibers per cc). There are no statutory or other mandatory standards, criteria, or procedures for deciding what to do with asbestos. Thus, health professional judgment based on exposure levels or potential exposure levels must be the primary determinant of what should be done with asbestos. Apart from this professional and scientific approach, closing bases present the additional problem of obtaining an economic return to the Government for its property. Asbestos in closing base properties must also be analyzed to determine the most prudent course in terms of removal or remediation cost and the price that can be obtained as a result.

The following specific policies will apply to bases closed or realigned (so that there are excess facilities to be sold) under the Base Closure and Realignment Act, P.L. 100-526.

1. Asbestos will be removed if:

(a) The protection of human health as determined by the Bioclimatological Engineer requires removal (e.g., exposed friable

asbestos within a building) in accordance with applicable health laws, regulations and standards.

(b) A building is unsalable without removal, or removal prior to sale is cost-effective; that is, the removal cost is low enough compared to value that would be received for a "clean" building that removal is a good investment for the Government. Prior to the decision to remove asbestos solely for economic reasons, an economic analysis will be conducted to determine if demolition, removal of some types of asbestos but not others, or asbestos removal and sale would be in the best interests of the Government.

(c) A building is, or is intended to be, used as a school, child care facility, or hospital.

2. When asbestos is present but none of the above applies, the asbestos will be managed using commonly accepted standards, criteria and procedures to assure sufficient protection of human health and the environment, in accordance with applicable and developing health standards.

3. A thorough survey for asbestos (including review of facility records, visual inspection, and, where appropriate as determined by the Bioclimatological Engineer and the Base Civil Engineer, intrusive inspection) will be conducted by the Air Force prior to sale.

4. Appraisal instructions, advertisements for sale, and deeds will contain accurate descriptions of the types, quantities, locations, and condition of asbestos in any real property to be sold or otherwise transferred outside the Federal Government. Appraisals will indicate what discount the market would apply if the building were to be sold with the asbestos in place.

5. Encapsulated asbestos in a building structure, friable or not, is not regarded as hazardous waste by the Air Force, nor does encapsulation within the structure of a building constitute "storing" or "disposing of" hazardous waste. Asbestos incorporated into a building as part of the structure has not been "stored" or "disposed of."

6. Friable asbestos, or asbestos that will probably become friable, that has been stored or disposed of underground or elsewhere on the property to be sold will be properly disposed of, unless the location is a landfill or other disposal facility properly permitted for friable asbestos disposal.

7. The final Air Force determination regarding the disposition of asbestos will be dependent on the plan for disposal and any reuse of the building. Decisions will take into account the proposed community reuse plan and the economic analysis of alternatives (see para 4). The course of action to be followed

Atch 2

ENVIRONMENTAL CLEAN-UP ADVISORY COMMITTEE

RESPONSE TO UNITED STATES AIR FORCE

ENVIRONMENTAL IMPACT STATEMENT (CLOSURE)

PEASE AIR FORCE BASE

TO THE PEASE AIR FORCE BASE

REDEVELOPMENT COMMISSION

JANUARY 29, 1990

ADDENDUM NUMBER (2)

February 8, 1990

The Pease Air Force Base Redevelopment Commission, Environmental Clean-Up Advisory Committee ("Committee"), submits the following information to the Pease Air Force Base Redevelopment Commission ("Commission") as a supplement to its initial submission dated January 29, 1990; and, such information is intended to be integrated into and become an integral part of such submission.

I. Additional Observations Impacting the Draft Environmental Impact Statement (Closure) ("EIS") -

Please note the enclosed correspondence to The Honorable Warren B. Rudman, United States Senate, dated January 30, 1990, relating to the "Asbestos issue", so called, at Pease. Such policy revisions should be incorporated into the EIS (See Exhibit 1).

II. Additional Comments Received By the Committee (copies attached):

- (a) Department of Air Force - John O. Rittenhouse (1/23/90)
- (b) Letter of Lawrence K. Smith (1/25/90)

Respectfully submitted,

PEASE AIR FORCE BASE
ENVIRONMENTAL CLEAN-UP
ADVISORY COMMITTEE

By: 
Robert B. Field, Jr.,
its Chairman

RBF/bam
Exhibit 1

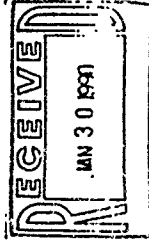
Attachments:

- (i) Department of Air Force
- (ii) Lawrence K. Smith

362 - The detailed Air Force policy on management of asbestos at closing bases has been added to the text of the EIS in Appendix G. The letter of Lawrence K. Smith was received by the Air Force. Refer to responses 103 through 110.

With respect to asbestos at each closing installation will be analysed in the Disposal and Reuse Environmental Impact Statement, and will be included in the record of decision (ROD). Any buildings or facilities where the proposed asbestos plan is controversial will be addressed in the ROD, either individually or as a class of closely related facilities.

8. Since other considerations must be taken into account at bases that are continuing to operate, this policy does not apply to them, nor is it necessarily a precedent for asbestos removal policy on them.



91 Bowwow River Road
East Kingston, NH 03827

January 25, 1990

Dr. Hugh Stirts
Environmental Management
HQ SAC/DEV
Offutt AFB, NE
68113-5001

Dear Dr. Stirts:

Attached are my comments on the Draft Environmental Impact Statement for the closure of Pease AFB in New Hampshire. These comments are based on more than 10 years experience in working with the NEPA process prior to my retirement from the U.S. Forest Service, both as Environmental Coordinator at the National Forest level, and preparing NEPA documents at the Ranger District level. Never have I seen a sloppier, more inadequate, and unprofessional treatment of the NEPA process as this document represents.

In my estimation, the process first became flawed when the Secretary of Defense failed to submit a Legislative EIS to accompany the proposed Base Closure and Realignment Act that was sent to the Congress in 1988, as required by the NEPA and the CQ Regulations; and the process went downhill from there. I have learned, through discussions with a member of Senator Warren Kudman's staff, that the decision of circumvent certain aspects of the NEPA process (the discussion of alternatives), thus bastardizing the entire process, was instigated by Rep. Dick Army of Texas. This was done because previous attempts at base closure, which did receive full treatment under NEPA, resulted in no bases being closed; so the thinking was that if any bases were to be closed under the new proposal, the only way to do it was to include language in the ECA to ignore the part of NEPA that was causing the problem. This is hardly in compliance with either the spirit or letter of the law.

I would be very interested in seeing how the Environmental Protection Agency rates this document in terms of compliance with NEPA and the CQ Regulations, especially in light of their concerns regarding alternatives related to other projects being proposed in New Hampshire by other Federal agencies.

Sincerely,
Lawrence K. Smith
Lawrence K. Smith

cc: Pease AFB Redevelopment Commission, Portsmouth, NH
Environmental Protection Agency, Boston, MA
Environmental Protection Agency, Washington, DC
Council on Environmental Quality, Washington, DC

USAF EIS- Pease APB - L. Smith- page 2.

Page 4-1; Sec 4.1 - Introduction

The first sentence is incorrect - there is no discussion of impacts on the Socioeconomic Environment, or on Aircraft Safety, both of which are included (to some degree) in Chapter 3.

Page 4-18; Sec. 4.17

1) 1st. paragraph, line 8 - "Transport by cargo aircraft...", not "of".

2) 2nd. paragraph, line 8 - "...New Hampshire Department of Transportation ...", not "Roads".

I look forward to seeing a much improved document when the Final EIS is published.

USAF Draft EIS- Closure of Pease APB, NH
Comments by L. Smith, East Kingston, NH

Executive Summary

Page S-1; 1) 2nd. para.- state that alternate methods of carrying out closure will be discussed, but Chap. 2-Alternatives, contains no such discussion, only a shopping list of who goes where and how they're going to get there. 2) 4th para- "Programmed force structure discussed in separate environmental assessment" - what is that document, who prepared it, and is it incorporated by reference in this EIS?

Page 1-1; Sec. 1.1- Introduction

1) Last paragraph has reference to modification of NEPA process. By what authority did the Secretary of Defense propose legislation to do this? NEPA and the CEQ regulations contain no provision for modification of the process. Statutory requirements for EIS are in 40CFR1502.3; timing for preparation is covered in 1502.5.

2) NEPA and CEQ require a Legislative EIS to be prepared to accompany proposed legislation and reports to Congress prior to a decision being made. Alternatives to closure should have been discussed at this stage in the process. (CEQ 1506.8)

3) During the NEPA process, no action can be taken which will limit the choice of reasonable alternatives. ((CEQ 1506.1(a)(2).))

Page 1-6; Sec. 1.2- Location

Pease APB also abuts the Town of Greenland.

Page 1-7; Sec. 1.4.1 - General Environmental Policy

There is only a general reference to "CEQ", but the actual regulations (40 CFR 1500-1508) are not specifically cited.

Chapter 2-Alternative - see previous comments

Chapter 3-Affected Environment

Needs maps to accompany the discussion of various resources so that the reader can relate to their location on the base.

Page 3-28; Sec. 3.13 - Socioeconomics

This entire section is a complete cop-out, and a rather loose interpretation of 40CFR1508.14. How anyone in their right mind can say that there are no socioeconomic impacts resulting from base closure is incomprehensible. The second sentence of paragraph two is sufficiently vague as to be totally ambiguous.

Chapter 3 is supposed to discuss the socioeconomic environment as it exists now; chapter 4 should discuss effects of closure on that environment. Don't wait until Bechtel Corp. finishes their report just so you can copy it.

Page 3-37

Figure 3-4 does not show the often used flight paths (with their accompanying noise levels) that cross East Kingston, Kensington, and Hampton in an east-west direction.

STATE OF NEW HAMPSHIRE

Inter Department Communication

January 26, 1990

FROM: Richard A. Flanders, Supervisor
Water Quality Section
AT: JEFFREY, Water Supply & Pollution Control Division
SUBJECT: Environmental Impact Analysis Process-DRAFT EIS for the Closure of Pease Air Force Base, Dec 1989. Dept. Air Force - Comments on Water Quality Issues

TO: Carl Baxter, Admin.
Waste Management Eng. Bureau

I have reviewed those portions of the above referenced report that pertain to water quality issues and offer the following comments.

p. 1-9 OK as discussed.

p. 3-18 Par. 3. The second sentence is inaccurate. In general Great Bay does meet requirements for Class B waters (New Hampshire Water Quality Report to Congress 305(b), DES/MSPCD April 1988). Areas of the Piscataqua/Great Bay estuary have been closed to shellfishing, but are generally open to recreational activities such as fishing (Interagency Report on the Shellfish Waters of New Hampshire DES/MSPCD, DHHS/DPHS, MRF60/FD, Feb 1989).

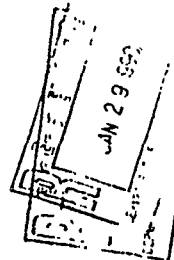
The next sentence should read brackish not "bracking".

p. 3-20 Discussion under "wastewater" should reference New Hampshire Water Supply & Pollution Control Division, not Commission.

p. 4-4 Under the discussion of "Surface Water Resources", last paragraph, there should be mention of the study of organic contamination in shellfish etc., done by the Environmental Health Risk Assessment Unit of the Division of Public Health Services (Brook Dupee) which mentions Pease AFB as a possible source.

Given the discussion on permit issues I have copied pertinent sections and passed them along to Jeff Andrews for his review and comment.

RAF/tm
57890



364 - The FEIS has been changed in Section 3.7.1 on page 3-18 to reflect the updated information supplied in your comment. "Bracking" has been corrected to "brackish." "Commission" has been corrected to "Division." Discussion of the study of organic contamination in shellfish in Great Bay is appropriate for inclusion in Chapter 3 and has been added to Section 3.7.1 on page 3-18 of the FEIS. The study does not specifically mention Pease AFB as a source, but it is likely that Pease AFB has contributed to a cumulative organic contamination. The discussion in Section 4.5 does not require any change.

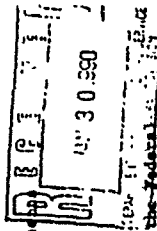
STATE OF NEW HAMPSHIRE

Inter-Department Communication

To: Carl W. Barter, Administrator
DES, Waste Mgmt. Eng. Bureau
Date: January 19, 1990

From: Dennis R. *[Signature]* Director
Office: Air Resources Division

Subject: Draft EIS for Pease AFB Closure - Air Resources Division Comments



1. Page 1-9, Section 1.4 should also include references to: the Federal National Emissions Standard for Hazardous Air Pollutants (NESHAP) for asbestos, the Federal TSCA rules for PCBs and the State of NH rules for asbestos found in Env-C 400.

2. Page 2-4, Section 2.2.2 discusses proposed alterations to Buildings 147 and 759 but makes no mention of whether or not asbestos surveys or removals would be involved in these proposed building alterations.

3. Page 2-7, Section 2.2.2 does not adequately describe the type of vapor control proposed for installation on the existing 500,000 gallon JP-7 fuel tank.

4. Page 2-8, Section 2.2.3 mentions the use of contractors by the Air Force to perform several functions including asbestos removal but does not indicate the qualifications required for any of these contractors. Env-C 400 and Env-P 5000 require in part that personnel involved in asbestos removal projects shall be licensed and certified.

5. Page 3-4, Section 3.4.1 mentions numerous accidental fuel releases including significant fuel releases investigated under the IIR program, but does not discuss the results of the investigations of the significant fuel releases.

6. Page 3-7, Section 3.4.6 references an ongoing survey for asbestos. Copies of the reports of this survey including findings and results should be provided to the appropriate local, State and federal agencies and to prospective property owners. It should also be noted by any concerned party that building surveys frequently fail to identify all asbestos containing materials present.

7. Page 3-13, Section 3.4.8 discusses the proposed use of two pilot treatment plants using air stripping and carbon adsorption, but does not mention potential air quality impacts or air pollution permitting requirements.

8. Page 3-14, Section 3.5 incorrectly states that Air Quality Control Region 121 includes all but Coos County in New Hampshire. There are three Air Quality Regions (AQCRs) in New Hampshire: AQCR 121 which includes Belknap, Cheshire, Hillsborough, Merrimack, Rockingham, Strafford, and Sullivan counties; AQCR 149 which includes Carroll and Grafton counties and AQCR 107 which includes Coos County. In addition, the reference to the NH Air Resources Commission should be changed to the NH Air Resources Division.

365 - The discussions in Sections 1.4.4 and 1.4.5 imply the inclusion of the referenced standards and rules. The purpose of Section 1.4 is to provide a general listing as opposed to a detailed encyclopedic listing. Only Building 259 will involve some asbestos removal, which will be done in accordance with applicable regulations. The type of vapor control proposed for the jet fuel tank is an aluminum honeycomb internal floating roof. The construction contract requires compliance with the most current applicable State regulations. All contractors of the Air Force will be required to be properly licensed and certified for the tasks they will perform.

366 - Asbestos survey results will be provided to the appropriate entities. The Air Force has conducted all reasonable means to identify all asbestos containing materials present. Permits for the operation of the two pilot treatment plants have been obtained from the NHDES. Also, pursuant to CERCLA and the Interagency Agreement, all remedial actions at Pease AFB must meet all applicable State and Federal regulations. Air quality standards are included in this group of regulations. Impacts of the remedial alternatives will be analyzed and presented in the upcoming Feasibility Study and conducted in accordance with CERCLA and the Interagency Agreement. Section 3.5 in the EIS has been corrected (see page 3-14). Refer to response 22 and 176.

Pease

Air Force Base
Comprehensive
Redevelopment Plan

TASK REPORT

1.5.1. Review Air Force Draft Closure EIS

Bechtel Corporation

In Association With

HTR Companies

RKG Associates, Inc.

Kilroy Industries

Pease Air Force Base

Redevelopment Commission

Portsmouth, NH

INTRODUCTION

In December, 1989, the Air Force issued a Draft Environmental Impact Statement (DEIS) on the closure of Pease Air Force Base (PAFB). As a guide to our review of the DEIS we have used the contents and format of the letter from George Jones, chairman of the Pease Redevelopment Commission (PRC) to Mr. Wayne Wiley at Offut Air Force Base in Nebraska, dated April 10, 1989. This letter outlines the concerns that the PRC felt should be addressed during the preparation of the closure DEIS as well as our assessment of the DEIS response to those concerns.

The Air Force's approach to assessing the environmental impacts resulting from the closure of Pease raises a number of issues related to its interpretation of the intent of environmental impact assessment process and its role in cooperating with the PRC redevelopment planning effort. The Closure DEIS excludes the deactivation of the 509th Bombardment Wing and transfer of its 21 FB-111s. This realignment action is considered a separate action and is the subject of a separate environmental assessment scheduled for completion in mid-February of 1990. It also postpones consideration of socio-economic and other impacts until the Reuse EIS is drafted. Regardless of the timing of the decision to deactivate the 509th Bombardment Wing, there will clearly be cumulative socio-economic impacts of both that action and the closure of the base that must be quantified prior to reuse planning.

The timing of the sequence of impact studies is such that all information on baseline and cumulative socio-economic impacts will only be available after the base is closed. This approach detracts from the timeliness of the EIS process.

In structuring a two-step EIS process, the Air Force has elected to exclude all baseline socio-economic data from the Closure EIS. The Air Force's position is that consideration of socio-economic impacts is not required by statute based on their assumption that there are no associated negative physical environmental

369 - It is agreed that the socioeconomic impacts of the FB-111 fighter bomber withdrawal and of base closure will be cumulative due to the close timing of these two separate actions. However, even when considered cumulatively, there are still no indirect biophysical impacts caused by socioeconomic effects resulting from these actions. Refer to responses 9 and 102a. The Air Force does not agree that consideration of socioeconomic impacts in conjunction with the reuse EIS is not timely or that it is a major flaw in the base closure process. The Air Force plans for socioeconomic analysis as related to the reuse EIS as described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

consequences of transferring personnel and equipment from the base. This is a major flaw in the base closure process (regardless of its legal foundation) and, if the Air Force intends to make Pease AFB the model for future base closings, then this shortcoming should be corrected.

The Air Force's DEIS for the closure of Pease Air Force Base also raises a number of questions related to approach, process, timing of proposed actions, completeness, and information accuracy. These are discussed in the paragraphs that follow.

1. Solid and Hazardous Waste Issues

The Closure DEIS provided a general overview of the present hazardous waste problems that are being evaluated by the Air Force's Installation Restoration Program (IRP). Unfortunately, the Draft Final Report for Stage 2 of the IRP was released shortly after the Air Force completed the Closure DEIS. The final EIS for closure should include a summary of the findings of the Stage 2 Draft Final Report and address in more detail the activities and scheduling of Stage 3 of the IRP which will be undertaken to remediate the identified contamination problems.

The DEIS states that the Air Force is required to remediate all hazardous waste sites on the installation; however, cost estimates, funding constraints and schedule are not discussed, but should be.

The Closure DEIS should also address the Air Force's responsibility for cleaning up hazardous waste problems attributable to Air Force activities, but potentially not identified until after the Base has closed and anticipated transfers of property ownership have occurred.

In the real estate markets of today, no land can be sold or leased without indemnifying the purchaser/lessor against the cost of hazardous waste removal.

370 - The Stage 2 Draft Report is currently undergoing finalization. Some changes to the report are being made; therefore, it is inappropriate to summarize from the draft report as the information may not be totally accurate. The activities of the Stage 1 work have been discussed in detail at the recently established (February 1990) Technical Review Committee, which meets monthly. Mr. Michael Farron is a member of this committee and can obtain this information for you (Bechtel Corporation). In addition, the Stage 3 Work Plan, which describes remedial work, is available for reviewing, along with all other IRP documents listed in Appendix H, in the Reading Room in Building 43 on-base. Costs for all the remaining work cannot be estimated at this time as the full extent of the work has not been established. Funding authorization is ultimately a function of Congress. All efforts will be made to ensure adequate and timely funding for work at Pease AFB. The schedule for IRP work is required to be developed and submitted to EPA and NHDQS within 21 days after the signing of the Interagency Agreement. This schedule is currently being developed and will be issued in accordance with the requirements of the Interagency Agreement. Refer to responses 35, 96, 116, and 172 also.

371 - Refer to response 250. Your concern that there are no funds appropriated for future hazardous waste contingencies is noted.

February 8, 1990

cc: George A. Mollineaux, P.E., DES
Michael A. Sills, Ph.D., P.E., DES-WMD-
Carl W. Baxter, P.E. DES-AMEB

2017年11月17日

STATE OF NEW HAMPSHIRE

Inter-Department Communication

FROM Jeffrey G. Andrews, P.E., Supervisor AT (OFFICE) Water Supply & Industrial Permits Section
DATE February 2, 1990
SUBJECT Review of Draft EIS for Pease AFB Closure
TO Carl W. Baxter, P.E., Administrator
Superfund Management Bureau

363 - The suggested sentence has been added to Section 1.4.5 on page 1-10 in the FEIS. Pease AFB will request a modification of its present NPDES permit prior to implementing any of the changes listed in your comment. The 509th Combat Support Group, which will become the host unit to complete the base closure plan on 1 October 1990, will submit a reapplication for the NPDES permit on or before 22 March 1991 with the required NHANG building information.

On January 30, 1990, I reviewed the subject DEIS relative to surface water/NPDES issues and offer the following comments:

P. 1-9 A sentence should be added explaining that once certified, an EPA NPDES permit becomes a state permit under RSA 485-A:13.

An NPDES permit modification is required for any changes in the nature of the discharges to any of the four surface water outfalls or to the wastewater treatment facility (WWTF) such as:

1. P. 2-7 flushing of underground fuel lines
2. P. 3-3 disposal of the caustic solution stored in USTs
3. P. 3-4 tank bottom discharges during upgrading and/or demolition of tanks
4. P. 3-13 all discharges from groundwater remediation WWTFs
5. P. 3-15 any not previously permitted discharges of boiler blowdown or condensate from Heat Plant #2
6. P. 3-18 any not previously permitted discharges of tank bottoms or surface water drainage from the bulk fuel storage area which drains to Paul's Brook
7. P. 3-32 the discharge of film forming foam to McIntyre Brook which has recently been found to cause in-stream toxicity
8. P. 3-3 the discharge of methylene glycol deicing fluid

The current NPDES permit will expire on September 22, 1991 and a reapplication must be submitted on or before March 22, 1991. Any of the above discharges not addressed in a modification of the present permit will need to be addressed during reapplication. The reapplication must also include:

1. As part of the state NPDES application package required under RSA 485-A:18, a revised site plan and building floor plans for current and proposed NHANG buildings.

Discovery of contamination by a project developer could result in loss of the anticipated benefits if funds were not immediately available for decontamination and removal. As it now stands, there are no funds appropriated for future hazardous waste contingencies, although the Air Force is committed to full installation restoration.

Ongoing negotiations between the State of New Hampshire Department of Environmental Services, the Environmental Protection Agency (EPA), and the U.S. Air Force will be crucial to the remediation of hazardous wastes at Pease Air Force Base. These negotiations should result in a three-party interagency agreement (IAG) detailing the responsibilities of the three organizations during the conduct of the hazardous waste remediation efforts. The IAG is scheduled for completion in February-March, 1990. The Closure DEIS should contain the highlights of the IAG with special emphasis on the impact of the Pease National Priorities List (NPL) status on the future transfer of property.

The DEIS assumes that the EPA will accept the Air Force's IRP work completed to date. If the EPA requires the Air Force to redo some of the IRP work, the timing of remedial activities will be affected and should be detailed in the final EIS.

Finally, the Pease Redevelopment Commission must fully understand in detail how the Air Force proposes to administer remediation activities once the Air Force personnel leave the installation. This is not covered in the DEIS narrative and should be in the Final Environmental Impact Statement (FEIS).

Only Landfill #5 is discussed (as part of the IRP program). The base landfills should be described and mapped and their contents should be disclosed as well as any necessary and appropriate short and long term remediation actions required.

372 - The interagency agreement is under negotiation and, as it is a legal document, its content cannot be discussed until it becomes final. EPA is just starting to get involved with work accomplished to date at Pease. It is not yet known if EPA will require the Air Force to "redo" some of the IRP work.

373 - Refer to responses 172 and 303.

374 - Refer to response 40.
375 - Refer to response 40, 172, and 340.

1.1 PRC Scoping Recommendations - DEIS Response

The EIS explains in detail the Installation Restoration Program (IRP) and incorporates by explanation and reference to the previous work the findings and procedures in the IRP and its correlation to the EIS process. The DEIS identifies and inventories solid and hazardous waste sites on the base. Further, it details past, present and future remedial actions that are anticipated to take place relating to the sites mentioned. What it fails to do satisfactorily is to explain the environmental impacts the hazardous and solid waste sites pose to the health, safety and welfare of current and future users of the base site. A risk assessment of the contamination of the 5 sites recommended for expedited remedial action will be performed within the next three years. This does not correspond to the anticipated and desired closure and reuse schedule. Hence, while necessary, it offers little in the way of expediting the impending transfer of property.

While the EIS itself does not assess the impact of closure/clean-up and post closure/cleanup monitoring on the redevelopment and future use of the air base it does note that such assessment will be a part of the activities carried out under the auspices of the aforementioned interagency agreement (IAG).

The DEIS ignores the PRC's request for an assessment of the scope and costs of any demolition and debris removal anticipated as a result of closure.

No estimated cost figures are provided per the request of the PRC for cleaning up hazardous waste sites at PAFB. A potential source of monies identified to finance this effort is the superfund but no disbursement schedule of funds is offered. It is apparent that the USAF has begun the cleanup effort via the IRP program, but again no scheduled completion date for cleanup/restoration is identified. The anticipated interagency agreement will allow for cleanup while the transfer of property occurs. Again, all of these activities impact the closure and reuse schedule.

Cleanup procedures for a reputed TCE contaminated site under the current runway are not addressed.

The EIS identifies a myriad of cleanup programs pertinent to the base closure and the environmental restoration and remediation of the site. The anticipated interagency agreement should identify the entity or agencies responsible for cleaning up the site, potential funding sources to finance the restoration and hopefully establish a realistic timeframe for the work.

The various types of solid wastes currently generated at the base and subsequently disposed of off-site are identified and amounts are specified in the aggregate. Current or anticipated cost data for management and disposal of solid waste should be provided. The impact of closure and reuse on existing solid waste management contracts is not identified. Recommended solid waste management systems and practices to be utilized during the period between base closure and civilian reuse are not identified.

2. Above Ground and Underground Storage Tank Issues

The DEIS summarily describes the fuel storage tanks on the base and briefly discusses ongoing and proposed Air Force projects to remove, replace or upgrade these tanks. The DEIS makes a statement that these projects will be completed prior to the disposal of the installation subject to the availability of funds and approval by the State of New Hampshire. The Air Force should provide a master listing of all storage tanks, including date of installation, status, estimated costs for repair/removal/replacement, and a schedule for completion of any necessary work as an appendix to the FEIS.

The Air Force should also determine if the federal government or State of New Hampshire proposes any changes to Underground Storage Tank (UST) regulations which could impact on the existing tanks.

376 - Refer to response 372.

377 - Cost data for management and disposal of solid waste are not necessary for presentation in this EIS. Such data were not necessary for the determination of any natural or physical environmental effect of closure. The impact of closure on solid waste management contracts was implied in Section 4.2 of the DEIS. Section 4.2 of the DEIS also stated that solid wastes will be managed by the caretaker unit during the period between closure and reuse.

378 - Refer to response 342. It is never certain that proposed changes to regulations will be adapted in their entirety. Therefore, underground storage tank regulations were not investigated for any proposed changes.

2.1 PRC Scoping Recommendations - DEIS Responses

An inventory referencing location, type, and specifying content and capacity of currently utilized above ground and underground storage tanks at PAFB is provided in the DEIS. No residential storage tanks are identified. The existence, or lack thereof, of any storage tanks other than those identified is not reported. While specifying the number of storage tanks currently inoperative, the DEIS does not identify the previous contents and date closure or removal of any tanks and the resulting environmental impacts, if any. Further, the DEIS does not identify testing or monitoring for groundwater or soil contamination relating specifically to the closure of any tanks.

379

Beyond a statement that "Related piping systems are of the same age and materials as the tanks," the DEIS provides no information on the location, contents carried, structural condition and/or current use of piping or pipeline components associated with the storage tanks. The FEIS should provide this information. The DEIS does not offer a description of current or recommended monitoring procedures for soil and/or groundwater contamination specifically related to the known above or underground storage tanks.

The economic impact of potential closure of all underground and above ground tanks and related piping systems is not addressed. The estimated cost of any required or anticipated closure or removal of any or all underground and above ground storage tanks and related apparatuses is not provided.

380

The FEIS should identify an entity/agency and potential funding sources to assure structures and facilities are in compliance with applicable federal, state and local laws relating to under and above ground storage tanks and related apparatuses.

379 - Other storage tanks -- aboveground 275-gallon residential heating oil tanks -- do exist on the base. They are located in the trailer park and in the housing unit areas along Sherburne Road and Calvin Court. Refer to response 342. The operation and closure of tanks has been, and will continue to be, in accordance with applicable regulations. These regulations require testing and monitoring for ground water or soil contamination. The related piping systems are obviously located in close proximity to and are connected to the tanks. The pipes carry the same contents as the connected tank. Refer to response 330.

380 - Cost data for the closure of tanks and related piping systems are not necessary for the determination of any natural or physical environmental effect. Section 3.4.1 of the DEIS stated that the objective of the tank work is to bring the tanks into compliance with applicable Federal and State regulations and that the work is subject to approval by the State of New Hampshire. Refer to responses 19 and 151.

February 9, 1990

6

3. Wetland Issues

The DEIS describes wetland resources on the base but does not assess the value or relevance of studies of the area that have been completed by university, state and federal organizations.

The Closure DEIS should address the findings on the Peverly Ponds in a U.S. Army Corps of Engineers study completed in the early 1980s. The coastal zone endangered plant species and archaeological surveys are planned for the Spring of 1991, well after closure.

In addition to these studies, Bechtel proposes to delineate some of the installation's wetlands and other separate studies will address various natural resource issues, especially in the vicinity of Great Bay. These completed and ongoing studies should be identified in the FEIS, but should not be interpreted as replacing or supplanting the USAF's responsibilities to provide such data.

The Air Force should recognize that the amount of wetlands on the base is disputed and seek resolution of the issue. As noted in the DEIS, 300 acres of "wetlands" (poorly and very poorly drained soils) were identified in 1982 by the Soil Conservation Service. Using a map of the base prepared by the Air Force others have estimated that there are 500 acres of wetlands. Without accurately mapped information this discrepancy cannot be resolved.

3.1 PRC Scoping Recommendations - DEIS Response

The PRC's recommendation/request that all freshwater and coastal wetlands on PAFB be categorized and/or inventoried according to their consistency with 701 Prime Wetland Criteria, Estuarine Research Reserve Criteria and New Hampshire Coastal Program Criteria for geographical areas of particular concern (APCs) and

areas for preservation/restoration (ARPs) was not responded to in the DEIS but should be in the FEIS.

No documentation or description of any past or present construction, excavation or filling in the PAFB wetlands are offered. Drainage areas and patterns are described but the impact on wetlands areas is not specified. Buffer areas and lands adjacent to wetlands that are necessary to preserve and protect the current ecology of wetlands on PAFB are not identified or evaluated. Hence, potential mitigation procedures to guard against any negative impacts resulting from closure are unknown.

In the DEIS no correlation is made, nor is any inventory evident of fauna or wildlife, endangered or not, which is dependent on the wetlands on Pease. As a result, no impact assessment resulting from the closure of the base is provided.

A species and habitat evaluation of all undeveloped lands on the base, specifically the area between McIntyre Road and Great Bay and any impact the closure may have on these areas was requested but not reported and it is assumed that none was performed. Lands potentially subject to Coastal Zone Management jurisdiction eligibility criteria are not identified.

Water quality testing for Upper Peverly and Lower Peverly Ponds was performed and the results presented in Appendix C of the DEIS. The information presented is in a format unfamiliar to the layman, hence, it is not readily understandable.

An analysis of the Peverly Brook and Pond watershed area specifying the quality and quantity of water and its potential use as a municipal water supply and any potential negative impacts the closure may have on this supply should be articulated in the FEIS. The same circumstances described above is applicable to the Hodgson Brook environs.

382 - Refer to response 155, 157, 158, and 228. Section 4.6 of the DEIS discussed the impact of reduced mowing of old fields and the effect of ending the base firewood cutting program. Section 4.7 of the DEIS discussed the effect of reduced human use of the base's freshwater pond fisheries, nonimplementation of needed fish habitat improvement projects, reduced mowing of old fields, reduced human use of wildlife for hunting, the reduction in aircraft noise, and reduced pollution. A specific habitat evaluation was not performed because closure will not cause significant losses of habitat. Lands potentially subject to coastal zone management will be addressed in the reuse EIS. The water quality testing information presented in Appendix C was discussed for the layman in Section 3.7.2 in the DEIS. Closure will not have any negative effect on the quality and quantity of Peverly Brook, the Peverly Ponds, or the Hodgson Brook environs.

4. Land Use and Groundwater Issues

A map indicating designated recreation trails and active recreation use areas should be provided to help in determining the type of current land uses on the base. Also maps indicating the location and acreage of the wetlands and firewood resources, the location of the wells/settling basins, and other environmental management features described would be helpful in assessing the impacts of closure.

The area of the nesting habitat of the Upland Sandpiper (one of the endangered species found on the site) is identified as the lawn between the runway and the apron. What is the basis for this location?

383

4.1 PBC Scoping Recommendations - DEIS Response

It is evident in the DEIS that an inventory of base structures to determine their significance or conformance with the criteria of the National Heritage Inventory was accomplished. Further, the New Hampshire State Historic Preservation Office (SHPO) was also accommodated prior to or during the promulgation of the DEIS. Oblique reference is made to the potential existence of human remains in old burial sites on PAFB but no detailed survey and/or analysis of cemeteries or grave sites on the base was undertaken. It should be done.

An identification and inventory of present and potential recreational uses of PAFB property based in part on the unique or special aesthetic characteristics of the property is contained in a variety of sections of the DEIS.

The DEIS evidences no indication of an inventory and assessment of the quantity and quality of the groundwater aquifers underlying the air base. Further, there is insufficient data relating to groundwater flow direction at the base. Current levels of TCE contamination and remedial measures to counteract contamination in the

383 - Although such maps and inventory may be necessary for the development of reuse alternatives, they are not needed for the determination of closure impacts. The upland sandpiper prefers dry, open grasslands, undisturbed by cultivation. The grassland strip between the runway and apron provides such habitat. Section 3.12 of the DEIS stated that a historical resources survey of the base is planned in conjunction with preparation of the reuse EIS. The survey will include cemeteries or grave sites.

384 - Refer to responses 171, 222, 278, and 352. Work required to be done relative to aquifer restoration has not been developed. This issue will be further investigated under the IRP and suitable action will be taken as identified by investigative results. The funding source for all cleanup work is the Department of Defense. The Department of the Air Force will manage the program.

385 - Refer to responses 32, 165, 332, and 342. The lead-based paint survey conducted in the base housing in the early 1980's is available to the Bechtel Corporation at the Base Civil Engineering Office. It is not necessary to publish such detailed information in an EIS. A lead-based paint survey has not been conducted of any other base buildings.

384 - Refer to responses 171, 222, 278, and 352. Work required to be done relative to aquifer restoration has not been developed. This issue will be further investigated under the IRP and suitable action will be taken as identified by investigative results. The funding source for all cleanup work is the Department of Defense. The Department of the Air Force will manage the program.

385 - Refer to responses 32, 165, 332, and 342. The lead-based paint survey conducted in the base housing in the early 1980's is available to the Bechtel Corporation at the Base Civil Engineering Office. It is not necessary to publish such detailed information in an EIS. A lead-based paint survey has not been conducted of any other base buildings.

5. Public Health Issues

The Air Force has undertaken a program to survey all base facilities for asbestos. The policy of the Air Force is to remove/encapsulate all identified friable asbestos. However, the Air Force and the PRC differ on the disposition of nonfriable asbestos. The current Air Force position is that nonfriable asbestos will remain in place. The PRC is concerned that redevelopment plans may require demolition of numerous buildings containing nonfriable asbestos. Once this asbestos is disturbed, special requirements for handling and disposal will be necessary. Whether or not the USAF assumes responsibility for the removal of the asbestos, the environmental impact and associated mitigation measures necessary should be discussed in the FEIS.

The Air Force should also include in the Closure FEIS a reference to manifests and disposal locations for previously removed asbestos materials.

The Pease AFB building survey should be included as an appendix to the Closure FEIS. Any building inventory completed identifying the locations of lead base paints should be included as an appendix to the Closure EIS.

The possible contamination of human food sources at, or abutting the base was not adequately addressed in the Closure DEIS. The Air Force should assess the impact of any groundwater contamination that has reached Great Bay and possibly adversely impacted potential human food sources.

5.1 PRC Scoping Recommendation - DEIS Response

In March, 1990, the USAF is scheduled to complete an inspection of all buildings on Pease AFB to determine the type and extent of the presence of asbestos. The DEIS notes this fact and identifies a series of buildings at PAFB where asbestos is known to exist and in what form and where it has been removed and the total quantities removed. The DEIS does not provide information or the costs associated with the removal and disposal of asbestos in compliance with state and federal laws now or in the future. The FEIS should provide this data.

The USAF acknowledges the existence of 6 radiation sources at Pease and offers a brief description of the type and measurement of radiation present at those sources. Further assurances are offered regarding the safe handling of any radiological sources on the base. The DEIS does not respond to the PRC's request to assess the environmental impacts of the presence of these materials either past, present or future. Nor does the DEIS identify within any specificity the ultimate disposal site of any contaminated materials.

The past and present use of pesticides and herbicides at the base is confirmed. A description by name of the products used is provided. Storage of these materials on base is acknowledged. The implications of the storage and use of pesticide and herbicide products used on the base is not identified. The use of chlordane, by that name, is not noted. The chemical components of the pesticides/herbicide products used are not described. A generalized identification of the locations of applications is indicated but the dates and duration of

386 - Refer to response 364. The impact of any ground water contamination that has reached Great Bay will be assessed under the IRP.

387 - Presentation of the cost data for the removal and disposal of asbestos discussed in Section 3.4.6 of the DEIS is not necessary for the determination of the environmental impacts caused by closure of the base.

388 - Refer to responses 29 and 250.

389 - Past IRP investigations have not indicated any direct or indirect environmental or health risks associated with the use of pesticides and herbicides on the base. In the upcoming Preliminary Assessment Investigative work to be conducted this summer by the Air Force IRP contractor, several areas where pesticides and herbicides have been used will be investigated. These areas are: railroad track right-of-way on which herbicide was applied, areas treated with chlordane, and the area at the golf course where pesticides were mixed.

pesticide/herbicide usage is not provided. Much more detailed information should be provided in the FEIS to ensure that future users and occupants of the site are knowledgeable about any environmental or health risks involved.

Appendix A in the DEIS lists hazardous materials and their location at Pease. The appendix and the text of the DEIS do not specifically identify all past and present storage locations, as well as any known contamination sites resulting from spills, disposal or storage practices associated with the use of pesticides and herbicides at the base. The FEIS should do so.

The DEIS provides a description and explanation of the Installation Restoration Program (IRP). Via the IRP, areas of existing contamination of any kind are identified and assessed, the clean-up strategies are described and eventually implemented with the appropriate public regulatory agencies. Under the auspices of the IRP program, approximately 22 sites of varying degrees and types of toxic and hazardous contamination are identified. The DEIS references the IRP as responsive to concerns about hazardous waste impacts, assessments and cleanup. The DEIS in and of itself does not identify: 1) all storage areas of potential sources of PCB and/or TCE contamination, and account for storage practices and procedures, 2) any known sites of PCB and/or TCE contamination, 3) all methods, dates and locations for disposal of PCB and/or TCE contaminated materials, 4) estimate all costs associated with disposal of PCB and/or TCE contaminated materials, 5) an entity or agency and funding source responsible for assuring compliance with all applicable federal, state and local laws relating to PCB and/or TCE contamination. This data should be provided in the FEIS.

A description of the water quality in Great Bay is provided in the text of the DEIS. The DEIS does not to any significant degree assess the extent, if any, of contamination of the potential human food sources in Great Bay as requested by the PRC.

390 - To date, the IRP has not identified any contamination sites resulting from spills, disposal, or storage practices associated with the use of pesticides and herbicides at the base. All known contamination areas, be it TCE, PCB, or other substances, have been identified by the IRP. The Air Force will be conducting another search of the base this spring/summer to ensure all potential contamination areas have been identified. PCB items are disposed of off-base in accordance with the requirements of 40 CFR 761.60. Past practices of disposal of any TCE contaminated materials is unknown. Estimated cost associated with past disposal actions is unknown. The funding source for all cleanup work at Pease AFB is the Department of Defense. The Air Force manages the cleanup in accordance with applicable regulations. Refer to responses 24 and 176.

391 - Refer to response 364.

The DEIS fails to identify and inventory to any significant degree the possible sources of lead contamination in the base water supply distribution system. The DEIS acknowledges the past and present use and existence of lead-base paints at Pease. The DEIS does not, as requested by the PRC, identify and inventory all locations where lead based paints have been used. The DEIS does not assess costs of remediation, assess potential health risks associated with not removing those paints from each location, identify specific lead standard or standards used to assess potential health risks. Finally, the DEIS does not identify an entity or agency and potential funding source for costs of remediation or elimination of any potential public health risk associated with the presence of lead based paint at Pease. The FEIS should provide this information.

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6. Socio-Economic Impact Issues

Socio-economic impacts of the personnel removal and base closure are not adequately addressed in the DEIS. Employment, taxes and other fiscal components, community service impacts, housing costs, and impacts or recreation are not quantified as baseline data in the DEIS. The brief survey of the effect of closure on local employment is inaccurate and not very useful.

To measure the benefits and costs of reuse alternatives, baseline data on the full range of socio-economic impacts is required. No attempt is made to indicate numbers of employees and dependents leaving at each of the major inactivation dates, and thus the timing of employment impacts is not addressed.

The Closure DEIS indicates that as of October 1989 there were 3,465 military personnel and 537 civilian federal employees composing the labor force at Pease. Military personnel were accompanied by approximately 4,746 dependents. The effects of relocating most, if not all, of the military personnel, civilian employees, and their dependents elsewhere will have major consequences on the economies of the surrounding communities.

393

392 - Refer to responses 185, 189, 203, 273, 278, and 385. As Section 4.3 of the DEIS stated, lead-based painted surfaces will not be disturbed and will be left in place, which will not cause any significant health hazard to the public.

393 - Refer to responses 9 and 102a regarding why socioeconomic analysis is not required for the completeness of the FEIS for base closure. The comment indicates the discussion on local employment is inaccurate and not useful. No specific issue is identified regarding the claimed inaccuracy. It is assumed that this comment relates to the downturn in the regional economy which has occurred since the 1988 employment information presented in the DEIS was collected. Refer to response 77 regarding the economic downturn issue. With regard to the usefulness of this information, it is sufficient for purposes of the base closure EIS. The reduction of military and civil work force strength for the PB-111 aircraft withdrawal and base closure are presented in Section 2.1, page 2-1, and Section 2.2.1, pages 2-2 and 2-3, of the DEIS. Sections 2.1, page 2-1, also states the PB-111 withdrawal will occur in the July to September 1990 time period. Section 2.2.1, page 2-3, states that only a maintenance staff of 50 civilian employees will remain at the end of the second quarter of fiscal year 1991. The second quarter ends March 31. The actions necessary to close the base, including troop strength reductions and civil work force reductions, will be initiated following the signing of the Record of Decision. This action will follow completion of this EIS. The timing for employment impacts is relatively short, being less than 1 year. A detailed breakdown beyond that described in the previously identified section is not necessary for this EIS. Your comment regarding the economic consequences of removing base personnel and dependents is noted.

6.1 PBC Scoping Recommendations - DEIS Response

The DOD Office of Economic Adjustment (OEA) is identified as a principle source of federal grants, assistance and aid to counteract the impacts of the closure of the Pease facility.

As a result of the USAF decision to address socio-economic impacts in subsequent Reuse EIS the current DEIS relating to closure does not address the direct and indirect impacts to business and employment in the Seacoast region of New Hampshire resulting from the removal of personnel and closing of the air base. The economic impact on the region's prevailing wage rates and/or the remaining labor force is not evaluated.

The number of off-base housing units occupied by military household is identified in the aggregate in Table 4.13.1-1 in the DEIS. The DEIS does not categorize this housing data by community. The DEIS identifies the number of military owner occupied units off base (220) but does not speculate on their disposition (i.e., to be sold) as a result of the closure action. The issue of impacts on the property tax base of local communities and the provision/cost of municipal services is not addressed.

The impact of local vs. non-local procurement (e.g., food, fuel, construction services, etc.) by the base prior to closure should be analyzed. An accurate economic multiplier assessing the effect of closure on the local economy should also be determined by the Air Force.

The economic impact of the New Hampshire National Guard increasing its activities while the base is being closed should be addressed.

394 - Your comment that the Air Force did not address the socioeconomic impacts is noted. The disposition of housing and the impacts on the property tax base of local communities and on the provision and cost of municipal services are all socioeconomic issues. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

395 - The economic impact of the NHANG increasing its activities is a socioeconomic impact. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS.

The loss of USAF gram funds will have a major impact on the Portsmouth school system (e.g., potential teacher layoffs and school closings). This impact should be analyzed and appropriate mitigation measures should be recommended.

The assessment of impacts on area military retirees and their dependents resulting from the base closure is presented very succinctly in the DEIS: "The commissary, base exchange, hospital and like facilities will be closed and special access privileges for retirees terminated upon closure." It is suggested that the military retiree population could avail themselves of alternative commissaries, etc., at three bases within 100 miles, the nearest to Portsmouth being located 58 miles away.

7. Infrastructure Issues

One issue that needs much more discussion in the FEIS concerns the Air Force plans to operate and maintain the necessary installation services after closure occurs and prior to the transfer of land to other parties. The Closure FEIS should include a detailed listing of those services.

The Closure FEIS should also comment on the Air Force's plans to leave facilities in "move-in" condition when they depart. For example, will unused buildings be properly winterized? Will the Air Force clean sewer lines, oil separators, sludge drying beds, etc. prior to departing? In effect, what is the program for accomplishing this objective?

The Closure of Pease Air Force Base could cause some immediate impact on air navigation and safety in the region. The magnitude of these impacts will vary depending upon action taken by the Air Force and the FAA to offset the loss of certain Air Force air navigation equipment and personnel.

The most serious navigation and safety impact will be the pending loss of the radar approach control (RAPCON) service now being provided by the Air Force. This

396 - The loss of Federal impact aid funds to the Portsmouth school system is a socioeconomic impact and will be considered in conjunction with the reuse EIS. The Air Force plans for socioeconomic analysis as related to the reuse EIS are described in Section 4.11, page 4-9. They are somewhat different from plans described in the draft closure EIS. Your comment concerning the DEIS's discussion of the loss of base facilities on area military retirees is noted.

397 - Refer to responses 291 and 360.

military radar facility currently provides vectoring, traffic separation and final approach fix information to aircraft landing at Pease. These air navigation services are provided to altitudes well below a 1000 feet. Civilian radar facilities in the area will be unable to provide similar air traffic separation and monitoring below 3000 feet. This difference can be critical for the future viability of large civilian aircraft operations to and from Pease during the high traffic summer months and at times of intense IFR weather which is a fairly frequent occurrence during the New England winters.

The Air Force at the time this report was prepared has not completely finalized its planning regarding the RAPCON facility. Apparently it is considering operating the RAPCON for a two-year period. If necessary, the PRC should ask the Air Force to consider extending the two-year period to five years to give the FAA time to develop a reasonable civilian alternative.

398

The availability of reliable instrument landing systems and air navigation aids is very important in attracting civilian users and tenants. A full Instrument Landing System (ILS) with glide slope would eliminate the need for some but not all of the services provided by the current Air Force RAPCON facility. Civilian radar with the capability of traffic separation down to 1500 feet altitude when combined with an ILS with glide slope would be a viable alternative to the present RAPCON service.

Other air navigation facilities which will be affected include the military VORTAC which is not compatible with FAA civilian Visual Omni Range (VOR) equipment and will have to ultimately be replaced.

The operation of the control tower itself, the communication equipment and related facilities is also not addressed in the closure EIS.

It is our recommendation that the base closure EIS should include a discussion of these impacts because it has a direct bearing on air navigation safety and the

398 - Refer to responses 95, 232, 233, and 313. RAPCON will be operated by the FAA following base closure to avoid potential air safety problems which would result from its discontinuance. The role air navigation aids play in attracting civilian users and tenants to the base for reuse purposes is beyond the scope of this closure EIS. Your comment regarding the noncompatibility of military VORTAC with VOR equipment is noted. The tower would be operated at the level necessary to facilitate operation by the NHANG. This is discussed in Section 4.17.1, page 4-20, of the FEIS. The commentator's recommendation regarding the closure EIS has been previously addressed in this response.

future usefulness and viability of Pease AFB after it is converted to civilian operation.

7.1 PRC Scoping Recommendations - DEIS Responses

The DEIS identifies the location of 4 permitted wastewater outfalls and related surface drainage patterns in graphic form. Unpermitted outfalls are not referenced. Bio-assay studies to assess impacts to water quality and human food sources in the proximity of all point source discharges were not referenced as a part of the environmental impact assessment of base closure. The flow capacity is identified, but no assessment as to the operational condition and/or required capital improvements to the base's wastewater treatment facility is documented in the DEIS. This information should be included in the FEIS.

The DEIS does not respond to a PRC request for information assessing the current surface water drainage system and its compliance with state and federal discharge standards. It does not identify the system's design, adequacy of filtration systems, and need for improvements, and the costs for system maintenance and upgrade. The FEIS should do this.

Information regarding the base's central heating facility and systems and relevant environmental impacts resulting from closure is not provided. Specifically the following information was requested: 1) An assessment of current and anticipated operational costs for the central heating facility, including personnel, equipment, fuel and maintenance expenditures, 2) assessments of the current operational condition of the central heating facility, and a time line of current and future capital improvements that may be necessary, 3) an analysis of the location and operational condition of the associated above ground and underground heating pipe network for distribution of heat generated by the facility, and 4) assessments of impacts and restrictions on future land development due to location of above ground heating pipes.

399 - Unpermitted outfalls are considered to be insignificant and unnecessary for an adequate discussion of wastewaters in the EIS. "Bio-assay studies" have not been required or conducted. Section 3.7.2 of the DEIS implied that the wastewater treatment facility and surface water drainage system are in good operational condition in that NPDES permit conditions are being met except during heavy rains. Required capital improvements for reuse of the wastewater treatment facility and surface water drainage system are relevant to the reuse EIS.

400 - The detailed information requested is relevant to reuse planning and is not relevant to closure of the base. The heating facility will be maintained for salability.

A detailed evaluation of the electrical service grid should be provided in the final EIS. Specifically whether capital improvements must precede a transfer of the electrical grid system to a public or private utility for operation. What necessary expenditures are required to ensure compliance with applicable code standards.

The environmental consequences of closure as relates to several other facilities and utilities on base should be covered in detail in the Final EIS. Specifically, an assessment of the current drinking water supply and distribution system for on-base structures is warranted. Information on the quality and quantity of water supplied by this system relative to state and federal standards, and the annual operational and capital expenses associated with the system as well as the number of personnel required to run the system.

In addition, an assessment of annual expenditures for maintenance and repair of the on-site road network and an assessment of personnel requirements, both number and skill levels, for continued maintenance and operation of the road network, as well as for snow removal.

The final EIS should assess the condition and operational status of all base traffic control devices.

The final EIS should provide data as to environmentally sound and sensitive procedures identifying costs, impacts and recommended methods for removing on-base structures serving exclusively military functions--such as ammunition bunkers and weapon storage facilities--in the event such removal is warranted or necessary.

8. Housing

The Closure DEIS fails to assess the existing conditions of base housing. This housing has acknowledged public health code violations (asbestos, lead paint).

18

February 8, 1990

401 - A detailed evaluation of the electrical service grid, assessment of the drinking water supply and distribution system, and assessment of the base road network and traffic control devices are relevant to reuse planning and are not relevant to closure of the base. Closure will not involve the removal of ammunition bunkers or weapons storage facilities. A discussion of their removal in the EIS is not warranted.

402 - Base housing will be maintained for salability. The reuse of buildings containing asbestos and lead-based paint will be addressed in the reuse EIS. The mobile homes are not Air Force property. The disposal of the mobile home park grounds will be addressed in the reuse EIS.

403 - An evaluation of both the structural integrity of all base housing and the demolition of all or part of the base housing is relevant to reuse planning and is not relevant to closure of the base.

The DEIS should explain if and when base housing will be brought up to code and maintained during the closure process.

The disposition of the mobile homes on the base after the closure was not addressed in the DEIS and has surfaced as an issue of significant concern. It should be thoroughly evaluated in the FEIS.

8.1 PBC Scoping Recommendations - DEIS Response

A conditional assessment of the base housing stock was requested but not responded to in sufficient detail in the DEIS. The final EIS should contain an evaluation of the structural integrity of all base housing. If deficiencies are noted then the FEIS should identify the entity or agency and funding source responsible for bringing housing units into compliance with applicable state and local housing laws.

Further, the final EIS should assume that demolition is an option so it should identify the amounts and costs of disposal of all or part of the existing housing units within all federal, state and local waste disposal laws.

Summary

The Pease Air Force Base Closure EIS is significant in that it sets the stage for the transfer of ownership of the base from the Air Force to a civilian entity. As such it is important that the Closure EIS provide as much information as necessary to ensure a mutually satisfactory closure process.

The Draft Closure EIS does not address all of the issues related to the impact of base closure, nor does it provide adequate source documentation. The timing of several proposed remediation actions does not coincide with the redevelopment

planning effort. This may result in a duplication of effort and an inefficient use of planning funds.

The data presented in Table A, Hazardous Materials and Their Location, needs to be explained better and a map should be provided to allow for identification of the location of the materials described. The information in Table B, Hazardous Wastes and Their Past Locations of Accumulation, is virtually undecipherable to the layman. A more understandable format for presentation of this information should be used in the Final EIS.

The Closure EIS attempts in many ways to effectively respond to the concerns raised by the Pease Redevelopment Commission and others during the scoping process. The information presented is fairly well organized and every effort is made to provide detailed analysis of the environmental impacts of the base closure. Unfortunately, information of sufficient content to allow for the best possible reuse/redevelopment planning effort is not provided.

It is the intent of the comments herein to offer a constructive critique of areas where the subsequent product, the Final EIS, could be improved.

404 - Although the closure EIS sets the stage for the transfer of ownership of the base, it must be remembered that the scope of the baseline in the closure EIS is limited to that necessary for determination of closure impacts only. The primary purpose of the EIS is to help the Air Force intelligently cease operations. The PEIS addresses all of the issues related to the impacts of base closure and provides adequate source documentation. The Air Force regrets that the timing of IRP remediation actions do not coincide with the redevelopment planning effort. Additional details regarding hazardous materials and wastes can be obtained from the Base Civil Engineering Office. It was not the purpose of the closure EIS to provide information of sufficient content to allow for the best possible reuse/redevelopment planning effort. The Bechtel Corporation should contact the base for any information it deems necessary to enable it to do the best possible redevelopment planning. Pease AFB will cooperate as much as possible. Your constructive critique was appreciated.



DEPARTMENT OF THE AIR FORCE

WAFB-0104-20330

FEB 5 1979

OFFICE OF THE ASSISTANT SECRETARY

JAN 23 1990

Mr. Mike Farren
Executive Director
Pease AFB Redevelopment Commission
P.O. Box 5295
Portsmouth, NH 03801

Dear Mr. Farren:

As you requested during our January 18, 1990 telephone conversation, the attached summary information is provided concerning the environmental compliance process at all five of the closure bases. The Air Force has been proceeding with National Environmental Policy Act (NEPA) compliance at all of the closure bases.

I hope this information is helpful to you. If I can be of further assistance, please contact me.

Sincerely,

John O. Rittenhouse
Deputy for Installations Management
Deputy Assistant Secretary of the Air Force
(Installations)

Attachment
NEPA Summary Data

405 - This enclosure to the Pease AFB Redevelopment Commission's letter does not contain any specific comments on the DEIS. It has been reproduced for a complete presentation of the Pease AFB Redevelopment Commission's letter.

Chanute AFB Environmental Impact Statement
Subject: Base Closure

Completion Date	Action
890415	Scoping Process/Comment Period Ends
890816	PDEIS to LEEI for Review w/EPC
890829	PDEIS Review Complete
890829	PDEIS Review Comments to ATC
890928	DEIS to LEEI for Security/Policy Review
891014	Security/Policy Review Complete
891020	File DEIS with EPA
891027	DEIS in Federal Register
891116	Public Hearing on DEIS
891211	Public Comment Period on DEIS Ends

Current Status - Document out for review.

George AFB Environmental Impact Statement
Subject: Base Closure

Completion Date	Action
890417	Scoping Process/Comment Period Ends
890929	PDEIS to LEEI for Review w/EPC
891013	PDEIS Review Complete
891020	PDEIS Review Comments to TAC
891201	EIS to LEEI for Security/Policy Review
891208	Security/Policy Review Complete
891222	File DEIS with EPA
891229	DEIS in Federal Register
900130	Public Hearing on DEIS
900212	Public Comment Period on DEIS Ends

Current Status - Public hearing is 30 Jan 90, 1700 hrs, Greentree Inn, Victorville.

Mather AFB Environmental Impact Statement
Subject: Base Closure

<u>Completion Date</u>	<u>Action</u>
890327	Scoping Process/Comment Period Ends
890707	PDEIS to LEEI for Review w/EPC
890721	PDEIS Review Complete
890721	PDEIS Review Comments to ATC
891102	DEIS to LEEI for Security/Policy Review
891116	Security and Policy Review Complete
891117	File DEIS with EPA
891124	DEIS in Federal Register
891218	Public Hearing on DEIS
900108	Public Comment Period on DEIS Ends
Current Status - Working responses to public comments.	

Norton AFB Environmental Impact Statement
Subject: Base Closure

<u>Completion Date</u>	<u>Action</u>
890407	Scoping Process/Comment Period Ends
890718	PDEIS to LEEI for Review w/EPC
890802	PDEIS Review Complete
890802	PDEIS Review Comments to MAC
891025	DEIS to LEEI for Security/Policy Review
891109	Security/Policy Review Complete
891117	File DEIS with EPA
891124	DEIS in Federal Register
891213	Public Hearing on DEIS
900108	Public Comment Period on DEIS Ends
Current Status - Working responses to public comments	

EQUIPMENT, AND CLOSING OF THE BASE, CLEARLY A PHYSICAL UNDERTAKING, DOES NOT HAVE A SOCIAL OR ECONOMIC IMPACT ON PORTSMOUTH AND THE SURROUNDING COMMUNITIES THAN WHAT DOES? HOW CAN THE COMMUNITIES IN TWO SEPARATE PARTS OF THE COUNTRY BE FOUND TO BE SO SIMILAR THAT THIS SECTION IN BOTH THE CHANUTE AFB DRAFT EIS AND PEASE AFB DRAFT EIS ARE EXACTLY THE SAME? WHY ARE THESE TWO IDENTICALLY WORDED SOCIOECONOMIC COMMENTS FOUND IN TWO DIFFERENT CHAPTERS OF THESE TWO BASE'S DRAFT EIS. IN THE CHANUTE AFB DRAFT EIS THE SOCIOECONOMIC STATEMENT IS FOUND IN CHAPTER 4, ENVIRONMENTAL CONSEQUENCES AND IN THE PEASE DRAFT EIS IT IS FOUND IN CHAPTER 3, AFFECTED ENVIRONMENT? WHICH IS THIS EXACT DUPLICATION OF WORDS, A STATEMENT OF ENVIRONMENTAL CONSEQUENCE OR AN INDICATION OF THE AFFECTED ENVIRONMENT? PAGE 4-10, PARAGRAPH TWO. WHERE ARE THE ENVIRONMENTAL CONSEQUENCES IN THIS PARAGRAPH? IT APPEARS THAT THIS SIGNIFICANT NEGATIVE IMPACT IS TOO HOT TO HANDLE? PAGE 4-11, PARAGRAPH TWO. A VERY DESCRIPTIVE PARAGRAPH OF BASE EXCHANGE SERVICES. AS A PART OF CHAPTER 4, ENVIRONMENTAL CONSEQUENCES, WHY IS NOT ONE WORD WRITTEN ON ITS IMPACT ON THE HUMAN ENVIRONMENT AS A RESULT OF BASE CLOSURE? I DON'T BUY THE AIR FORCE AFFIRMATION THAT A LOT OF THESE SUBJECTS WILL BE COVERED IN THE REUSE EIS. THIS CONCLUDES MY COMMENTS ON THE DRAFT EIS. I THANK YOU FOR YOUR INDULGENCE AND ZAGERLY AWAIT YOUR DECISION ON RESPONSES TO THESE COMMENTS AS PER 40 CFR,

1503.4.

Theresa M. Jones
61 Hawthorne Dr.
Pease AFB ME 03801
27 Feb 1998

407 - Refer to response 84.

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, NE 68113-5001

Dear Dr. Hugh Stirts,

I am writing in reference to the closure of Pease AFB, more specifically the impossible hardship imposed upon the 60 mobile home park residents. I have been stationed at this base since October of 1985. In March of 1987 I purchased a mobile home on the base for \$28,000. In the past, an owner who was moving would sell his trailer to another AF member, and the home would remain on the same lot. If an owner could not sell, he was then forced to move the mobile home from the lot. This procedure worked until 1989 when the announcement of the closure came.

Our situation now is impossible. We have been directed by our AF base commander to have our mobile homes off the premises of Pease no later than 31 March 1991. Military members are not interested in buying our mobile homes because the base is closing and they too are moving. Civilians are not interested in them because there is no place to put them within a 60 mile radius and they cannot be left on base property.

Mobile home moving companies will not move a trailer that is over 16 years old (mine is 14, which is about the average age in the park) because they cannot be certified as "road worthy". Also, New Hampshire state law forbids us from moving our homes out of the state if they have a mortgage note against them.

When the announcement of the closure was made, we were told that we would receive assistance through the Army Corp. of Engineers under the Housing Assistance Program (HAP). One year later we were told that we would not receive assistance with this program because the regulation governing the program specifically excluded mobile homes.

Sir, at this time there has been no solution offered to us. I will be getting an assignment within the next few months, and most of the residents in the park already have theirs. Some have already moved to their next base. We will be forced to pay for these mobile homes as well as the home we intend to live in at our next base. An alternative is to claim bankruptcy and possibly destroy our AF careers with the threat of financial irresponsibility.

As a leader, and an influential member in our government, we need you to do something about this situation. I have given my life to the Air Force. I have served loyally for 9 1/2 years, and I feel that this is an injustice to me personally and career wise. Under such a devastating hardship I cannot be fully devoted to my career.

Sir, I need your help. As I stated earlier, there is little time left, and an expedient response is imperative. If you need any further information my home phone is (603) 433-0682 and my work number is (603) 438-4181. Thank you for your time.

Sincerely yours

Theresa M. Jones
Theresa M. Jones



United States Department of the Interior

OFFICE OF ENVIRONMENTAL PROJECT REVIEW
BOSTON FEDERAL OFFICE BUILDING
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ER90/34

Dr. Hugh Stirts
HQ SAC/DEV
Offutt AFB, Nebraska 68113-5001

February 28, 1990

RECEIVED
FEB 28 1990
12:44 PM

408 - Your general comments are noted.

409 - The comment that the National Park Service (NPS) strongly supports the continued retention of the three base ponds and the base golf course for recreational purposes is noted. The comment that the NPS also supports giving State and/or local recreation agencies the opportunity to apply for these areas under the Surplus Property Discount Program is noted. The NPS comment regarding support of any proposed plans for creation of a refuge or estuarine research reserve within the Great Bay area and its simultaneous concern about the integrity of existing recreation within an area experiencing dynamic growth is also noted. The disposal of these areas will be addressed in the reuse EIS.

Dear Dr. Stirts:

This is in response to the December 20, 1989 request from Deputy Assistant Secretary Gary Vest for comments on the draft environmental impact statement (DEIS) pertaining to the closure of Pease Air Force Base, Newington, New Hampshire (ER 90/34).

General Comments

We have reviewed the DEIS and find that the document, with a few noted exceptions, generally provides an adequate evaluation of the effects of base closure on resources of concern to the Department of Interior. We understand that a separate EIS will be developed concerning the future use/disposition of the 4,250 acres of Air Force property.

Specific Comments

Recreational Resources

The National Park Service is responsible for administering the Surplus Property Benefit Discount Program under Public Law 91-485 and also the tripartite cooperative agreements with the military under the Silkes Act (P.L. 90-465) within the northeastern states.

The report identifies the area in the vicinity of the three ponds as that part of the base most utilized for recreation purposes. A cooperative management agreement implemented in 1977 with the State of New Hampshire and Pease AFB provides swimming, picnicking, camping, fishing, hunting, winter sports and other more passive activities. The other major outdoor recreation area within the base is the golf course.

The National Park Service strongly supports the continued retention of these two areas for recreational purposes and provision for the State and/or local recreation agencies to have the opportunity to apply for these areas under the Surplus Property Discount Program. The SOBP identifies priorities and needs, one of the most important of which is the Management Plan for the Great Bay National Estuarine Research Reserve. This addresses the goal of protecting key land and water resources within the estuarine system. The SOBP's wetlands component specifically dealing with inland and coastal protection needs are addressed in a separate document, the Wetlands Priority Conservation Plan. Within this report's wetland values section, it is stated that such areas are for community open space. It further states that

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... areas support the very same aforementioned recreational activities now enjoyed within Pease AFB. And the report goes on, "The recreational value of wetlands may be further increased when culturally significant sites containing historic or archaeological values are located within their boundaries. The quality of wetlands to highly populated areas also contribute to their recreational and perceived values." The Newington Stone Schoolhouse currently leased by the base to the local community is on the National Register of Historic Places, while other structures may also have such potential. The high density and the growth rate of the Portsmouth-Kittery area also accentuate the recreational values of the wetlands within the base.

The ponds area is within an area of the base designated as fresh water wetlands. In addition to providing valuable recreation opportunities, it serves as a ground water recharge area returning freshwater to the underground aquifer. This irreplaceable resource should remain in public use, under suitable protection. While we would support any proposed plans for creation of a refuge or estuarine research reserve within the Great Bay area, we are concerned about the integrity of existing recreation which happens to lay within an area experiencing dynamic growth. We therefore recommend the retention for public recreation purposes remaining as such under state or local administration.

Contaminants

The Air Force has done a commendable job of cataloging and listing the hazardous wastes generated or stored on the base. It appears that efforts are underway to determine the locations on the base where hazardous wastes have been spilled or disposed and what the extent of this contamination is on and off the base. While these efforts are being accomplished under CERCLA/SAWA authority, we believe the Air Force also has a responsibility under NEPA to evaluate the consequences of this contamination on Public Trust Resources, at least during the time period between the start of base closing and eventual reuse/disposition of the property.

Migratory Birds

During the time interval between base closing and reuse/disposition of the property, maintenance personnel will periodically mow old fields, other grassland habitats and conduct other vegetation maintenance or manipulation activities. With the exception of lawns and similarly manicured areas we recommend, in accordance with the Migratory Bird Treaty Act 16 U.S.C. 703 et seq., that vegetation management activities such as, but not limited to, mowing be conducted after August 1 of each year to avoid destroying migratory birds, their active nests or eggs. It appears that special precautions may be necessary to safeguard the upland sandpipers nesting in the grassland strip adjacent to the runway and apron or other areas should they change nesting sites.

As the Department of the Interior has a continuing interest in this project, we are willing to cooperate and coordinate on a technical assistance basis in further project evaluation and assessment. For matters pertaining to recreational resources, please contact the Regional Director, National Park

410 - Although the Air Force agrees that NEPA compliance is required in the context of CERCLA/SAWA activity at Pease AFB, the activities under those statutes are actions separate and apart from base closure. To the extent NEPA requires consideration of the effects of contamination on public trust resources and alternatives to remedy such effects, that information will be assessed within the documentation related to the IRP. Those documents, as they are developed, will be available for public review and comment. Included within these documents will be an assessment of the risks posed by the contaminants at Pease AFB to public health and the environment, including natural resources. Refer to responses 40, 96, 345, and 350 also.

411 - Your recommendation to conduct vegetation management activities after August 1 of each year has been incorporated into the text of the FEIS in Section 4.6 on page 4-5. Necessary special precautions will be taken to safeguard upland sandpipers as discussed in the FEIS. In the event the birds change their nesting sites, necessary precautions will be determined. Refer to response 230 also.

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Service at 143 South Third Street, Philadelphia, PA 19106, Commercial and
FIS Number is 215/597-3503. For matters pertaining to wildlife resources,
please contact the Field Supervisor, Fish and Wildlife Service at 22 Bridge
Street, Suite 400, Concord, NH 03301, 603-225-1411 or FIS 834-4411.

Sincerely yours,



William Patterson
Regional Environmental Officer

APPENDIX J
DEIS PUBLIC HEARING TRANSCRIPTS

Environmental Impact Statement
Newington Town Hall, New Hampshire
17 January 1990

The following proceeding was taken at a public meeting concerning the draft EIS for the closure of the Pease Air Force Base, N.H., held at the Newington Town Hall located in Newington, New Hampshire, on Wednesday, 17 January 1990, commencing at 7:00 p.m.

Col Howell: Its 7:00, lets begin. The National Environmental Policy Act and implementing regulations require federal agencies to carefully analyze. I'm sorry, can't you hear? Give me another microphone. Is this better? On records, the other broadcasts. Alright, the National Environmental Policy Act and implementing regulations require federal agencies to carefully analyze the potential environmental impacts of proposed actions and use those analyses in arriving at decisions or recommendations on whether and how to proceed with those actions. The Air Force has prepared and distributed, in accordance with applicable regulations, a draft Environmental Impact Statement, or EIS, addressing a proposal to close Pease Air Force Base. My name is Colonel John Howell and I am a full time military trial judge for Air Force Courts-martial. I have been designated by the Office of the Judge Advocate General in Washington as a presiding officer for tonight's public hearing on this draft EIS. I am not here as an expert on any of these proposals, nor have I had any connection with their development, nor am I here to act as a legal advisor to the Air Force experts who will address these proposals. My purpose is to simply insure that we have a fair orderly hearing, and that all who wish to be heard have a fair chance to speak. Let me take just a moment to explain how tonight's hearing will proceed. This is not a debate, a referendum, or a vote on the proposals themselves. Please cooperate with me in the following procedures so that this hearing will proceed smoothly and efficiently. First, please do not signify your agreement or disagreement with a speakers' position by applause, expressions of disapproval or whatever. In my experience, that adds nothing to the hearing record and simply wastes your valuable time. This may in fact be the only time available for your personal input into your Government's decision making process. What this informal hearing, and I emphasize informal, what this informal hearing is intended to provide is a public forum for two-way communications with a view to improve the overall decision making

process. You notice I said two-way communications. Part One of that calls for you to listen carefully to what our Air Force experts say as you are briefed on the proposals and their anticipated environmental consequences. After the briefing, we will take a short recess and then you will be able to ask questions to clarify in your mind any points made in the briefing or in the draft EIS. Part Two of this process is for you to tell the Air Force experts what you think, to give the Air Force decision makers the benefit of your knowledge of the local area affected by these proposals and any environmental hazards which you may perceive. I'd like to emphasize that this is a proposal and not something that's already been decided, approved, and funded. Our hearing isn't for the purpose of justifying anything, but rather to identify and assess pertinent impacts including your personal perspective as to those impacts. Take notes as you wish during the briefings and fill out one of our comment sheets. I believe there are some more right down here on the corner. You may indicate on the comment sheet if you wish to ask a question or make a statement and the subject area involved. Right after our recess and after I've had a chance to collect these sheets, I will first recognize members of the public for purpose of putting a question to the Air Force experts. If your question is primarily of the cross-examination variety, that is, if its primary purpose is not to clarify a point, but rather to express a contrary point of view, please hold off until after the question period, when we will receive statements from public officials, designated representatives of private organizations, and members of the public. After all statements are received, I will devote any remaining time to taking other questions that may have been generated by the various statements and then we'll close the hearing. Please don't be shy or hesitant to ask a question or make a statement. This is an informal hearing and there are no dumb questions. I want to help ensure that all who wish to speak are heard, so please help me with these following ground rules. First, speak only after I have recognized you and please address your remarks to me. Second, speak clearly and slowly, starting out with your full name, address, and capacity as which you appear. That is, are you a public official, a designated representative of a private association, or a person speaking solely in his or her individual capacity so that our court reporter, Sgt Moore, who has the responsibility to make a verbatim record of these proceedings, can do her job professionally. Please ask one question at a time. I will certainly allow a reasonable number of questions. Again, please no argumentative court room questions. You will have an opportunity to make any statements you wish. Please try to limit your statements to five minutes so that we have time for everyone to be heard. Please honor any requests from me that you stop speaking and please do not speak while another person is speaking. I will recognize only one

person at a time. Finally, our hosts have asked that you please refrain from smoking in this hearing room and I would appreciate your cooperation in that regard. It is possible that there will be questions that the agency representatives here tonight are unable to answer. That could occur for one of two reasons. Even though a good deal of expertise is assembled here, they will not attempt to answer questions tonight unless they are confident they can do so accurately. In addition, there may be questions that have national security implications and these must be reviewed before answers are provided. If this should occur and if the question is relevant, I can assure you that it will be addressed in the final document which you may request a copy of, and you'll notice there is a place to do that on our comment sheet. Please fill out one of these comment sheets for us. You'll note that the statements can be submitted any time prior to February 13th by mailing them to Dr. Stirts, who's on our panel and the address.....is Dr. Stirts here, oh ya, there he is....where, oh there he is.....it will go to Dr. Stirts at the address that's listed on the comment sheet. Regardless of whether you read your statement on the record tonight, or mail it in later, it will be carefully considered and made part of the record of these proceedings. It will have equal weight and receive the same careful consideration whether you made it during tonight's hearing or afterwards. Your presence here tonight is commendable, in that it reflects a great interest in your community and in those things that are important to it. Please let me assure you that your interest here tonight is the sole reason for us being here. It's my pleasure to introduce Major Whitlow who will conduct the first briefing and then we will have a second briefing when Major Whitlow is done.

Major Whitlow: Thank you. I'm Major Mark Whitlow from Headquarters SAC. Our office, the XP division, is in charge of releasing aircraft and retooling resources. We're the single point of contact for the program plan to ensure the disposition of all personnel and equipment at Pease. The areas that are covered by this EIS were directed by our statement of work basically, which says that we are moving 13 KC-135s, 6 of those are going to Fairchild, 2 of them to Plattsburgh, 2 to Carswell, 2 to Wurtsmith, and 1 to Eaker. In addition to those aircraft movements, you have several tenant units that are on base right now. These are listed up here. The 26th Weather Squadron possibly it is still yet to be determined not the entire complement will leave. There is a requirement to have a weather support function for the Air National Guard. So there will be a certain number of weather observers that will be remaining with those folks. The recruiting squadron, and again this is not clearly defined at this point, but the negotiations are under way to possibly allow the present recruiting squadron to fall into the Air National Guard

containment area. That is not decided completely. If they don't go to the containment area, they will go to Hanscom Field. Next slide please. This shows the remaining tenant units that will be leaving upon closure. As you can see some of these are inactivated, some of them are moving. The final manpower losses or positions which you will be interested in are summarized on this slide. The 135 movements and the movement of the tenant units, there is a total of 2604 personnel that will be departing Pease upon closure. Thank you very much.

Col Howell: Thank you Major Whitlow. Mr. Kevin Marek, would you like to use the podium and would you introduce the members of your team, please.

Kevin Marek: Good evening. My name is Kevin Marek. My office is responsible for managing the environmental issues of the Strategic Air Command and what the office is responsible for is conducting environmental assessment analyses of Pease closure. We have contracted out to do the completion of the environmental assessment and Environmental Impact Statement for the actions at Pease. Let me introduce people that are up at the front desk table here. First, for there is Bob Nebel. He's with the Corps of Engineers, program manager for completing the environmental assessment and the EA for Pease. Mark Whitlow who you've already met is from Headquarters SAC, bases and units, and would have done the DOPAA, description of the action for the environmental statement. Also is Mr. Art Ditto, he is from Pease environmental and contract management for environmental. We consulted with Pease Air Force Base to get input for the document. Wanda Schroeder from Headquarters SAC environmental. A good section of the document included a review of the environmental work that's being done at Pease under the Installation Restoration Program, known as IRP. And last is Gene Sturm who did the noise analysis for the environmental assessment process. Major Air Force actions are required to be analyzed for environmental impacts by public law and the Air Force Regulations as shown here, you can go through a couple slides here. It's just the introduction....That states Air Force preparation has included to review both national environmental protection act, counsel of environmental quality, and Air Force Regulation 19-2. All of these are concerning the review of actions by the Air Force. The closure action was announced on December 29th and as part of a comprehensive package prepared by the Defense Secretary's Commission on base realignment and closures, on January 8, 1989, the Secretary of Defense accepted the Commission's report. The EIS process has been modified by the public law. These are some changes to the normal process which provides the National Environmental Protection Policy Act does not apply to the actions of the

commission or to the Secretary of Defense acceptance of the commission recommendations. This means that the decision to close Pease Air Force Base has already occurred and are outside the scope of the EIS being reviewed today. One of the EIS being announced today is the implementation of the EIS with the force structure change closure of Pease Air Force Base. And the focusing on the potential impacts taking place at Pease. Its purpose is to help Air Force intelligently cease operations and analyze local environmental effects caused by the closure and the measures necessary to implement the closure. Appropriate mitigation measures are developed were required. The Air Force hopes to have the EIS in association with the base closure completed in early 1990. This date will meet the base closure and realignment action requirement, but the implementation must be initiated by the 30th of September 1991 and must be completed no later than September 30th, 1995. Implementing the closure involves moving active Air Force units from Pease to other bases. These are the movements which have just been expressed by Major Whitlow. Environmental impacts to Pease caused by the departure of these units are within the scope of this EIS. The exception is the previously programmed force structure change of the 21 PB-111's. The PB-111's are being assessed in a separate NEPA document with a cumulative impact being addressed in this EIS. Environmental impacts caused by the arrival of these units to new locations are not part of this EIS. That is the planes going to Barkedale, Eaker, wherever they are going are not being assessed in this document. Those impacts will be assessed in separate NEPA documents focusing on the impact issues at those various locations. The second EIS will cover the final disposition of the facilities and the Air National Guard at Pease. If the local authorities do not elect to operate Pease as an Air Force Base, as an airport, excuse me, the Air National Guard Unit will be relocated. This process involves laws and community issues quite different from the straightforward, involved steps in the closure EIS, halting operations and moving equipment. The above information is detailed in Chapter one and two of the closure EIS, that is the document that has been mailed out to the libraries to the Pease Redevelopment and to those who have previously requested it. You also can see that there is a place on the form to check if you still do not have a copy and want a copy sent. The closure draft EIS presents, within Chapter three, the base line information of the current operations at Pease. Chapter four of this document accesses the impact of closure of the base and the withdrawal of the units. Specific impacts resulting from the previously programmed force structure change are discussed in the separate Environmental Assessment as noted prior. The cumulative impacts are included in this EIS. Today we are conducting a public hearing on your input. This input will assist in determining all the issues and concerns which should be

assessed in the closure EIS. In addition, anyone may write the Air Force with comments on the draft EIS. Is listed on the handout by 13 February, 1990. These comments should apply to the closure only. Comments for the reuse will continue to be reaccepted, be accepted. Let me go through a few of the steps that we have already been, gone through, in the EIS process. We're talking about what we have left out now. The need for the closure action and the realignment has been decided. The need to transfer to the receiving bases. Which bases have got and alternative basins for closure and receiving. None of these are going to be discussed within the EIS. The decision to close Pease has already been made. The bases in which the units are going to have already been decided. (Pause) This is pretty much of a generic outline of what is in the EIS, description of the action, description of existing environment, description of applicable laws and standards, and getting into the heart, a description of the impacts, this is the Chapter 4. Included in that is the means for mitigation of any adverse actions, and finally, the EIS we'll end up with after completed are the comments and the reviews of those comments will be a record of decision. And also, excuse me, there will be, coordination with others is also included in that excerpt. If you look through the EIS, see the next two slides, this slide includes what affected environment was reviewed in the document. Soils, air, ground water, plant vegetation, historic resources, endangered species, employment, noise, outdoor recreation, housing, transportation, are sections of all of these are within the document. Next slide please. Dates in which we have come to already. This 8 January, the Secretary of Defense approved the closure list. 8 February the notice of intent was in the Federal Register. This was published the first notice that we were going to do the environmental assessment documents. March, February, we had scoping meetings. One of the scoping meetings was held in March in this very building. Next. 22 of December the draft environmental assessment was filed with the Environmental Protection Agency. Environmental Protection Agency then had notice published in the Federal Register. This was the 29th of December. This kicks off the comment period. It's a 45 day comment period, excuse me, should say starts 29 December not July. And the public hearings are being held tonight and tomorrow night. The comments are due back February 13th which would be the 45 day comment period. We feel that we have identified the applicable environmental issues within this draft environmental assessment and assessed the probable impacts of our proposal. The draft statement has been published by the Air Force and has been made available to the public. Copies were mailed to local libraries, town halls, and also to your Pease Redevelopment Commission. The draft EIS was filed with Environmental Protection Agency and published in the Federal Register as indicated there on December 29. The

45 day comment period for feedback is allowed for the publication and the completion by the 13th of February. This public hearing is being held as part of the process to give you an opportunity to verbally comment on the draft statement. Written comments are also accepted and get the same official consideration as verbal comments. After the comment period is over, the Air Force will amend the draft to address all additional information received, and publish the results as a final Environmental Impact Statement. Final Environmental Impact Statement will be filed with the Environmental Protection Agency and notice of this publication will be in the Federal Register. The Air Force will prepare a record of decision upon the completion and filing of the final EIS. This act, the action the Air Force takes, is based on the record of decision. So after all the comments are in, they are reviewed, they are incorporated into the document, the Air Force then prepares the record of decision of what it is going to do for this action and any mitigating actions it is going to take. The final EIS will be filed in April. In April it will be given to the Environmental Protection Agency, filed in the Federal Register in April. April will be a 30 day waiting period for the record of decision to be made. This will complete the action. This concludes my briefing on the process and where we have been to get to the stage where we need to for public comment.

Col Howell: Okay. Let's get to questions and comments. Um, Could I have some help please, and if you could hand your um, comment sheets over to the table, uh, Chief, could you help us on that side please, and uh, please let us have your comment sheets. (Pause) Anyone need additional comment sheets? (Pause) Okay, if we could take, oh about a 10 minute recess, and let me sort these things out, and then we'll start again in, oh, about 10 minutes please.

(Recess)

Col Howell: Alright ladies and gentlemen, let's, let's proceed. Now this time will be set aside to allow you to ask questions about the contents of the briefing and the draft Environmental Impact Statement. It is not intended as a public comment or statement period which will cease later, but merely to provide more detailed information in response to your questions. However, in the interest of time and to move this thing along, those who have requested permission to ask questions and will make a comment, let's do it all together at the same time and then we'll move on to the comment period. Okay, uh, those of you who signed up to speak and not ask questions may wish to reserve any questions you have until after both the questions and the comments have been delivered, so that this time may be used by those who will not be speaking. Once

recognized by me, please step to the podium here in front since we want all present to be able to hear your question as well as to record it for our record. And please state your name and affiliation or address before you ask your question. Uh, let's begin please with Mr. G. Bradley Richards. Mr. Richards. Is Mr. Richards here tonight? Okay, I'll try later. That was quick. Uh, Mr. Keith Fumigalli, is that correct? Will you please join us?

Mr. Keith Fumigalli: My name is Keith Fumigalli. I live on uh, in the trailer park in Pease AFB. I'm affiliated with the Air Force. Um, my questions are directed to the Armed Corps of Engineers, at first. Okay, we feel in our situation with the trailer park is a unique situation because of the prices we pay for our trailers. So we feel that there should be some kind of an amendment or something saying to include the trailer park in the Army Corps of Engineers situation. Because of the price of our mobile homes. The question I have for you is, is there any chance at all of the trailer park to be included in the Army Corps of Engineers assessment?

Col Howell: Mr. Marek, would you like to deal with that?

Mr. Marek: Well, I don't know if it's directed to the Corps, but...

Mr. Sturm: I'll take the microphone and pass it to you, Kevin.

Mr. Marek: Go ahead and answer it and I'll take over.

Mr. Sturm: We didn't include this type of social economic impacts in the study or EIS that we have here. That was by design so that the impacts could be considered under the reuse EIS which the Air Force felt was more appropriate. Uh, with regards to your question as to whether or not this specific item will be included in the final EIS, I would then pass the microphone to Kevin. I think this is a decision that would probably have to be made after you have made your comments and we went back and evaluated it. But, Kevin, have you got anything here?

Mr. Marek: I guess my only understanding is that Air Force at Headquarters is looking into the unique situation. It is something unique as compared to other bases where the market value of trailers would be the same off base as on base in this situation. You are in a unique situation because you are in the Air Force and it is the only way you can get into that trailer park. Your assessing a little bit something different in the NEPA document as far as the closure of what

the closure at Passaic is doing to the environment as opposed to doing to an individual person or the person that are in that trailer court. Your comment will be noted and we'll see if this document and the comments that are brought here tonight will also be reviewed by Air Staff. So I can tell you that it will be reviewed that way whether it will be put out as a new issue as far as what will be addressed in the final EIS I cannot say that, not at this moment.

Col Howell: Wouldn't it be better if we left it this way: We will either get a written answer or it will be addressed in the draft or the final EIS or both?

Mr. Marek: Well, that's what I'm saying. You'll get an answer whether it was considered to put into the EIS or it will appear in the EIS. You'll get an answer in that way, yes.

Mr. Fumagalli: Another question I have for you. With our unique situation, if we were to move our trailers off base as of March 31st of 1991, the prices we paid for our trailers, like if we move out of this area to our next base, who's going to finance our trailers, for the price that we paid? Nobody's going to finance our trailers for what they, for what we paid for them, so therefore, it would be useless because nobody's going to refinance our trailers for us, for the outstanding cost that we paid for them.

Col Howell: As I understand it, that is more of a comment than a question isn't it?

Mr. Fumagalli: It's basically a question, you know. It's basically, you could say it's a statement.

Col Howell: Cause I'm not sure how we could answer that other than give you a list of banks. Yes, I can. I guess I can make a comment back to you. I certainly sympathize with you and I'm sure a lot of people within the system do, you know. It's not a good situation. Nobody wants this to occur. I guess that other than what I've said about the comment will be incorporated in, it'll either be you'll see something in the document or you will get a letter back saying why it was not, you know, further incorporated into the Environmental Assessment Document.

Mr. Fumagalli: And another thing. If we get orders overseas, and oh, what will we do with our trailers? We can't take them overseas with us. And we still have to keep paying the mortgage on it. Would we look into still getting money, you know first bids on base housing? But will

we get extra money to keep our mortgages going? Because if we can't, I mean, we're going to have to foreclose on them. I can't see anyone wanting to do that. Even the Air Force.

Col Howell: Again, if we can put that in the way of a comment. I'm not really sure that anybody has addressed the issue of how trailers of this sort are going to be financed. That might be a useful thing to look at when we are evaluating how to deal with that question. And I've made a note for a written response for you. Thank you. Brenda Blonigen, is that right? Blonigen? Please.

Brenda Blonigen: I am Brenda Blonigen. I am a private citizen and also I'm a homeowner in the mobile home park. And that's the issue that I want to talk about. I just want to ask a question. When should we expect some decision, one way or the other, as to how we're going to be dealt with? Right now, I don't even think the mobile home park has been addressed. At least, from everything I've read, from everything I've heard, I have never once heard anything about the mobile home park and I would like to know when something is going to be looked at, said and done about the mobile home park.

Col Howell: I guess, again, I'd have to repeat, as far as the EIS this process, it will be looked at. And whether it is included in the document or whether it is not included in the document will be decided.

Brenda Blonigen: Okay. Is there any particular reason why it hasn't been looked at as of this date?

Mr. Marek: It has not been presented to our office. I believe it is being presented at Air Force level. This is, this document is being presented at HQ SAC command, but we have not been directed at anything, to look at the trailer park within this particular document. But again, this document will be reviewed by command and if they decide, along with our review, that is something that should be considered in the EIS, we'll ---

Brenda Blonigen: So we should expect to see something in the EIS this time about the mobile home park. Is that what you are saying?

Mr. Marek: Either, it will be in the EIS or you'll get an answer why it is not in the EIS.

Col Howell: You haven't indicated whether you wanted a copy of the final. If I may I'll mark it on there, final, for you.

We invested a lot of time, a lot of money, into our dwellings. There are two Air Force representatives here. Just want it to be known, Mr. Puigallí talked about financial assistance. That the Air Force needs to we're not included in that as of yet. That the Air Force needs to amend that somehow. The town of Newington or the committee that decides what's going to happen with this property. I've read a few statements and they said that Newington wants to allow the trailer park to stay and add 50 more units. I want to go on record that I'm in favor of that. I believe that the other 50 people who live in that trailer park also would be in favor of that. And also, the Air Force itself, with no one else to help us out in this situation, I believe that the money that's going to be appropriated to move this base, to settle all of the environmental impact issues, and PCS everybody from here, something ought to be set aside if that trailer park is zoned commercial, and destroyed, that the people living there should somehow not suffer that loss that the Air Force I believe has created for them.

Col Howell: Do you have a question dealing with this?

Alan Cayer: No. The question was about the whole situation and that's already been answered. I just wanted to come up here and ---

Col Howell: And you'd like the written response?

Alan Cayer: Yes I would please.

Col Howell: Okay. And you've not indicated whether you want and EIS.

Alan Cayer: I also would like one, sir. Thank you very much.

Col Howell: Alright. Pause. Marek, I'm writing written response on the top of this. Thomas Krindler? Is that right? Krindler. Is that right? Thomas Krindler? Krindler. K R E I D E R.

Thomas Kreider: My name's Thomas Kreider. I have questions and comments. My first question is, are the people in the committee familiar with the housing assistance program as it stands right now?

Mr. Marek: The last check that I did with the housing assistance program is that they still had not come out and done the survey and it was being done by the New York Corps. That is the only information that

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Brenda Blonigen: Okay. Thank You. Yes sir, I do.

Col Howell: Randall Wyrick?

Randall Wyrick: Hello sir. My name is Randall Wyrick. I live in the trailer park also and I am active duty Air Force. Same problem. Come up again. I've been in the service 12 years now, and been to a lot of bases. I've seen how the Air Force deals with it's people, how the programs are developed, how they're carried out. I have not once seen anything since I've been here about the trailer park situation. I know Mr. Marek that we're going to bother you all night long because the majority of us here are from the trailer park and granted we would like some kind of decision as to what's going to happen. Right now that we're hanging on this thread, we don't know if we can come or we can go. We've got finances hanging over our heads, we've uncertain assignment actions over our heads, we've got all these headaches at one time. And it's like, we need to find out something as to what is going on with this trailer park. And it's like, we need an answer. People in the trailer park it's a major concern because obviously we have a great deal of money invested in the trailer park. And I was talking to Col Wilson at the Base and he's been in the service for 28 years. They've always taken care of them. I enlisted in the service to defend our nation and I feel that the Air Force in some way shape or form can help us out. Thank You.

Col Howell: Can I put you down for a written response? And you don't have anything here as to whether you want a final EIS. Can I mark that also?

Randall Wyrick: My wife's already asking you, sir.

Col Howell: Oh, okay. Good. Pause. Al Manoukian? Is that right? Manoukian? Can you please---

Al Manoukian: My questions have already been answered.

Col Howell: Okay. Fine I'll put you in the comment pile. Alan Cayer? C A Y E R, is that right?

Alan Cayer: My name is Alan Cayer. I also reside at Pease Air Force Base trailer park. Um, I've been there for 4 years now. I'm going to go back to these questions. We have a family over there.

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PETER BRESCIANO 101 O'LEARY PLACE PORTSMOUTH

THANK YOU FOR THE OPPORTUNITY TO COMMENT ON THE PEASE CLOSURE ENVIRONMENTAL IMPACT STATEMENT. ALTHOUGH MY COMMENTS MAY AT TIMES BE IN QUESTION FORM I DON'T EXPECT A REPLY. THE QUESTIONS AND COMMENTS I MAKE WILL APPEAR IN 18 PAGES OF WRITTEN COMMENTS WHICH I WILL SUBMIT FOR THE RECORD. AND I MIGHT ADD I TAKE EXCEPTION TO THE FIVE MINUTE RULE. 40 CFR 1506.6 ENTITLED PUBLIC INVOLVEMENT STATES THAT THE AGENCY SHALL MAKE DILIGENT EFFORTS TO INVOLVE THE PUBLIC IN PREPARING AND IMPLEMENTING THEIR NEPA PROCEDURES. I FEEL THIS 5 MINUTE RULE RESTRICTS THAT INVOLVEMENT.

TO BEGIN WITH, LET ME STRESS THAT I HAVE STRONG FEELINGS ABOUT THE SHALLOWNESS OF THIS DOCUMENT AND FEAR THAT NO MATTER WHAT I OR ANYONE ELSE FINDS LACKING, THIS DOCUMENT IS GOING TO BE RANTED THROUGH NO MATTER WHAT.

IN THIS PRESENTATION I WILL COVER ONLY A FEW OF THE MANY QUESTIONS AND COMMENTS FOUND IN MY WRITTEN STATEMENT.

GENERALLY, THE PUBLICATION OF INCORRECT INFORMATION, THE INCOMPLETENESS OF DATA GATHERED, AND THE LACK OF ANALYSIS OF THE GATHERED DATA HAS LED ME TO BELIEVE THAT THIS DOCUMENT WAS PUT TOGETHER WITH AN ATTITUDE THAT NO MATTER WHAT, GET THIS EIS OUT ON THE STREETS AND GO HELL BENT FOR LEATHER ON A RECORD OF DECISION. I SUPPOSE IF ENOUGH SUPERFLUOUS INFORMATION AND DATA IS PROVIDED, NO ONE WILL KNOW WHAT IS BEING SAID OR DONE.

SERVICES. THEN WHY ARE THE ECONOMIC AND SOCIAL ENVIRONMENTAL EFFECTS AND THE NATURAL OR PHYSICAL ENVIRONMENTAL EFFECTS SUCH AS FULL AND PART TIME EMPLOYMENT BY BOTH MILITARY PERSONNEL AND CIVILIANS, EDUCATION, AND RECREATION NOT CONSIDERED TO BE INTERRELATED? AT THIS TIME I WOULD LIKE TO ASK THE PANEL, WHO IN THE AIR FORCE DETERMINED THAT NO DIRECT OR INDIRECT BIOPHYSICAL EFFECTS COULD BE ATTRIBUTED TO SOCIOECONOMIC IMPACTS? WHAT SUPPORTING DATA WAS USED TO DETERMINE THAT IT WAS NOT NECESSARY FOR THE COMPLETENESS OF THE ENVIRONMENTAL ANALYSIS TO FORECAST SOCIOECONOMIC CONSEQUENCES? 40 CFR, 1508.14 SAYS THAT THE HUMAN ENVIRONMENT SHALL BE INTERPRETED COMPREHENSIVELY AND TO ME THAT MEANS TO COMPREHEND MUCH AND UNDERSTAND EASILY THE NATURAL AND PHYSICAL ENVIRONMENT AND THE RELATIONSHIP OF PEOPLE WITH THAT ENVIRONMENT. 1508.14 IS FOUND IN 40 CFR UNDER TERMINOLOGY AND FURTHER STATES THAT WHEN AN ENVIRONMENTAL IMPACT STATEMENT IS PREPARED AND ECONOMIC OR SOCIAL AND NATURAL OR PHYSICAL ENVIRONMENTAL EFFECTS ARE INTERRELATED, THEN THE ENVIRONMENTAL IMPACT STATEMENT WILL DISCUSS ALL OF THESE EFFECTS ON THE HUMAN ENVIRONMENT. ALL, I TAKE TO MEAN, THE ECONOMIC, SOCIAL, NATURAL, AND PHYSICAL ENVIRONMENTAL EFFECTS. NOWHERE IN 40 CFR 1500 DOES IT STATE THAT AN ENVIRONMENTAL IMPACT STATEMENT IS REQUIRED TO DISCUSS SOCIOECONOMIC EFFECTS ONLY WHEN SUCH EFFECTS ARE INTERRELATED WITH NATURAL OR PHYSICAL EFFECTS. IF A PHYSICAL MOVE OF OVER 4,000 PEOPLE WILL NOT HAVE A SOCIAL OR ECONOMIC IMPACT ON PORTSMOUTH AND THE SURROUNDING COMMUNITIES THAN WHAT WILL? IF THE MOVEMENT OF AIRCRAFT AND

IM LOOKING AT INCORRECT INFORMATION. PAGE 2-2, LIST OF UNITS BEING DEACTIVATED. WHAT ORGANIZATION ON BASE IS KNOWN AS THE 509TH AIRCRAFT MAINTENANCE SQUADRON? PAGE 3-12, PARAGRAPH THREE. IS BUILDING 113 THE 509TH MUNITIONS MAINTENANCE SQUADRON BUILDING? PAGE 3-22, PARAGRAPH FIVE. ARE THE MUD FLATS OFF THE SOUTHERN PORTION OF THE BASE? PAGE 3-5, PARAGRAPH FOUR. IS THE PROPER DESIGNATION, THE DEFENSE REUTILIZATION AND MARKETING ORGANIZATION? PAGE 2-2, LIST OF UNIT BEING DEACTIVATED. IS THE 541ST AIR FORCE BAND GOING TO BE DEACTIVATED? ON THE INCOMPLETENESS OF DATA. PAGE 3-5, PARAGRAPH ONE. APPENDIX A IS SUPPOSE TO CONTAIN A LISTING OF THE HAZARDOUS MATERIALS AND THEIR LOCATIONS ON BASE. ISN'T APPENDIX A NOTHING MORE THAN ANNEX C TO THE 509TH BOMB WING OPERATIONS ORDER 19-1, OIL, FUEL, AND HAZARDOUS MATERIALS SPILLS EMERGENCY PLAN? THIS LIST DOES NOT INCLUDE HAZARDOUS MATERIALS SUCH AS SEALANTS, ADHESIVES, PAINTS, CHEMICAL WARFARE EQUIPMENT TO MENTION A FEW. WILL A COMPLETE LIST OF HAZARDOUS MATERIAL AND THEIR LOCATION ON BASE BE MADE A PART OF THIS EIS? PAGE 3-5, PARAGRAPH TWO. IF SLUDGE USED AS LOAM AND FILL MATERIAL PRIOR TO 1987 CONTAINED HIGH LEVELS OF HEAVY METALS, WAS THE BASE WATER SUPPLY AFFECTED OR WILL IT BE AFFECTED IF THIS SLUDGE IS LEFT IN PLACE? ON LACK OF ANALYSIS. PAGE 3-28, ITEM 3.13. AT ANY TIME DURING THE PREPARATION OF THIS EIS BY THE ARMY CORPS OF ENGINEERS, WAS IT EVER DETERMINED THAT THE OPERATION OF PEASE AFB HAD AN EFFECT ON THE COMMUNITIES SURROUNDING PEASE? WITHOUT A DOUBT, IT CAN BE SAID THAT THE OPERATIONS OF AN AIR FORCE BASE HAS AN EFFECT ON THE LOCAL COMMUNITY THROUGH THE PURCHASE OF GOODS AND

I got from the Headquarters SAC Housing Office. They did some checking and it was the responsibility of the New York Corps to do that survey.

Thomas Kreider: OK. My question is are you familiar with the program itself, not the action that's being taken on the Fort right now?

Mr. Marek: Uh, not real deep. No.

Thomas Kreider: OK. Uh, just a real quick summary here. Just a piece of legislation that was made in 1966. Back then, it covered your standard house, what everybody pretty much calls a house, on ground and a concrete foundation, doesn't move too much. Back then in 1966, I doubt anyone could've even considered the housing market here in Portsmouth, the value of the mobile homes that they have and like we stated before, we have a unique case that I don't believe was even taken into consideration back then. When I came here to Pease in June of '88, I bought the mobile home, tent around here is really high and the price of buying a what people consider a normal house was out of the question. I'm enlisted. Uh, I thought I'd be doing the best thing I could for my family. Got a wife, two kids, and uh, six months later, my market was closed. By closing the base, you closed the market for the resale of those mobile homes. The way that park operates is that when you get orders to leave the base, you sell to people coming onto the base, and that's worked well. But, like I said, there's no market there anymore. Is the committee aware of any action that's being taken on behalf of the mobile home owners besides the studying or looking into that you've mentioned this...are you aware of any black and white actual doing type things that's going on right now?

Col Howell: I think that probably is going to have to be addressed similar to the other written response, and I think that's a good point to add into your response, is to see what assistance may be available for them.

Thomas Kreider: Uh, I guess we all know changing a piece of legislation can take a lot of headaches and a lot of years, or it can go really quick. For the fifty families that live here now, we're looking for something, hopefully, really quick. Our money's tied up. When I moved here, everything I had in the bank went to another bank as a down payment, that's it, that's all I have. If it's just going to be left to sit there and be bulldozed over for a factory or something...

Col Howell: Is your loan or most of the loans financed through the VA?

Thomas Kreider: No sir. It's not a Veterans Administration loan. It's, ah, actually through Newmarket, a local bank, as are many of the mortgages financed through that bank. There are some others though. As far as the impact of closing the base has on the mobile home park, that's significant from where I stand, but also significant is if that mobile home park were to be removed, I think Newington, especially, would be losing a pretty large sector of a potential. I don't want to say low income but how about not hyperinflated, housing market. Something that the worker, that all these new factories and stuff will hopefully bring in, will be able to afford. If that's to be done away with as part of the closure, I think it would be a pretty big loss. I believe that's all I have right now, sir.

Col Howell: Alright. Thank you. I put your letter down for a written response as well, and you are going to get a final. Jean Hardy, is that right? Gene Hardy? Yes, ma'am.

Jean Hardy: Good evening. My name is Jean Hardy. I live five miles to the northeast of Pease Air Force Base at Littlebrook Air Park in Eliot, Maine. Littlebrook Air Park is a private airport, public use, which my husband and I own and operate. I'm a commercial pilot, certified flight instructor, with over five thousand hours of flying time, with most of my flying time being in the seacoast area. It is my understanding that when the Air Force leaves Pease, the military radar facility which controls both military and civilian air traffic in the southern Maine seacoast New Hampshire area will be removed. Last summer, I wrote several letters to the various departments in the Federal Aviation Administration and asked what will happen to the airspace that the Air Force once controlled. The response was Manchester, Boston or Portland will absorb the airspace. The radar at Boston, Manchester and Portland, at times, is overloaded with current air traffic and these facilities will be unable to provide adequate radar coverage to the southern Maine seacoast New Hampshire area. Paragraphs 3.18.3 and 3.18.4 in the EIS states some concerns about the airspace over the Pease area and I must point out that in paragraph 3.18.3 is not totally correct. And I wish the people who had worked on this statement knew a little bit more about airspace and did some more homework or did some of their homework on this airspace. In the EIS, it is estimated that the Air National Guard will generate about one hundred flights a day and I'm concerned about air traffic over the coastline and KC-135's landing without radar protection. As a result of the radar facility closing, my airport will lose one instrument approach. I can live without one instrument approach, if the Air Force removes the radar. There is no doubt in my mind that a mid-air collision will happen, um, unless there

is some radar coverage. And I ask my question, in looking at your slide, which kind of caught me by surprise, looking at your slide in the opening statements, you estimated that the 1920th Comm Squadron is scheduled to leave Pease and be reassigned. The 1920 Comm Squadron, to my understanding, is part of the radar facility. The radar facility is part of that. And my question is, when is this leaving?

Col Howell: Major Whitlow, can you address that?

Major Whitlow: Final disposition of the radar approach control has not been determined. The base here more than likely, but not definitely, will pick up responsibility for presidential support. They have been asked formally in writing what their requirements for presidential support are. Truthfully, to look at the issue of radar coverage below three thousand feet. You currently will have it whether we have or not, or the Air Force is here or not, down to three thousand feet, and it'd be provided by the FAA. The, not to sound callous, because I fly and I've almost hit people before too. I understand your problem, especially in the high density area of this nature. The Air Force radar approach control was put here primarily for the Air Force facilities, although it did aid the local FAA. We're leaving and consequently we've been directed to take that, unless it is required for presidential support. If it is, it will remain, no question about it. In the interim between the time that we leave and the FAA takes over, which I cannot say definitely but the figures are towards 1993, is considerable that there could be an interim period where you would not have radar coverage from the surface to three thousand feet. Those radar departures and all known IFR traffic will still be maintained by the appropriate FAA controller. The people departing Pease at the time and approaching Pease, primarily in departures for you, I think, would be concerned in IFR weather, will be given broadcast departures and all known IFR traffic will be sequenced through the area at that time. That does not prevent your problem, I know, with the VFR traffic, but that, the final disposition of the radar approach control is not known at this time. The question has been asked and we should know, I would think, in the very near future.

Jean Hardy: My concern still stands, um, with the VFR traffic along the coastline. The airport traffic area only goes out five statute miles and the coastline does not include that protected airspace and I am seriously concerned about a mid-air over that point.

Major Whitlow: I understand your concern.

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Col Howell: Will that be addressed in the final EIS?

Major Whitlow: No sir.

Col Howell: Alright. Would you like a written response, or would you like to...?

Jean Hardy: Yes sir, I would.

Col Howell: OK. Let me... There are some "ifs" in that that I think need to be clarified. (Pause) Peter Bresciano? Is that right? Can you pronounce that correctly sir?

Peter Bresciano: Bresciano.

Col Howell: Bresciano. Thank you.

Peter Bresciano: Peter Bresciano, 101 O'Leary Place, Portsmouth, citizen. Thank you for the opportunity on the Pease Closure Environmental Impact Statement, although my comments may at times be in question form, I don't expect a reply. The questions and comments I make will appear in eighteen pages of written comments which I will submit for the record.

Col Howell: Excuse me, sir, are those the ones that we have attached?

Peter Bresciano: Yes. They are.

Col Howell: Thank you.

Peter Bresciano: And I might add, I take exception to the five minute rule. 40 CFR 1506.6 entitled public involvement, states that the agency shall not, shall make diligent efforts to involve the public in preparing and implementing any procedures. I feel this five minute rule rests its that involvement.

Col Howell: Sir, if you like, when we're finished with everybody else's comment, we can stay and hear everything that you have.

Peter Bresciano: No sir. It's all in the eighteen pages and I hate to go through eighteen pages, tonight.

Col Howell: Alright. What I'm saying, if the five minute rule

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Pease AFB Environmental Impact Statement
 Subject: Base Closure (I)

Completion Date	Action
890315	Scoping Process/Comment Period Ends
890711	PDEIS to LEEI for Review w/EPC
890801	PDEIS Review Complete
890801	PDEIS Review Comments to SAC
891101	DEIS to LEEI for Security/Policy Review
891124	Security/Policy Review Complete
891220	Security/Policy Re-review complete
891222	File DEIS with EPA
891229	DEIS in Federal Register
900117	Public Hearing on DEIS
900212	Public Comment Period on DEIS Ends

Current Status - Awaiting close of public comment period.

concerns you then I'll certainly be happy to tack you on at the end and you can take all the time you wish.

Peter Brasciano: All right. To begin with, let me stress that I have strong feelings about the shallowness of this document, and fear that no matter what I or anyone else finds lacking, this document is going to be run through, no matter what. In this presentation, I will cover only a few of the many questions and comments found in my written statement. Generally, the publication of incorrect information, the incompleteness of data gathered, and the lack of analysis of the gathered data has led me to believe that this document was put together with an attitude that no matter what, get this EIS out on the street and go hellbent for a letter on a record of decision. I suppose if enough superfluous information and data is provided, no one will know what is being said or done. I'm looking at incorrect information. Page 202, list of units being deactivated; What organization on base is known as the 509th Aircraft Maintenance Squadron? Page 312, paragraph 3; Is building 113 the 509th Munitions Squadron Building? Page 3-22, paragraph 5; Are the mudflats off the southern portion of the base? Page 3-5, paragraph 4; Is the proper designation the Defense Reutilization and Marketing Organization? Page 2-2, list of units being deactivated; Is the 541st Air Base Band going to be deactivated? On the incompleteness of data, Page 3-5, paragraph 1; Appendix A is supposed to contain a list of hazardous material in their locations on base. Isn't Appendix A nothing more than Annex C for the 509th Bomb Wing Operations Order 19-1, Oil, Fuel and Hazardous Materials Spills Emergency Plan? This list does not include hazardous material, such as sealants, adhesives, paints and chemical warfare equipment, to mention just a few. Will a complete list of hazardous materials and their locations on base be made a part of this EIS? Page 3-5, paragraph 2; If sludge, used as alone, and film material prior to 1987 contains high levels of heavy metal, was the base water supply affected, or will it be affected if this sludge is left in place? On lack of analysis, Page 3-28, Item 3.13; At any time during the preparation of this EIS by the Corps of Engineers, was it ever determined that the operation of Pease Air Force Base had an effect on the community surrounding the base? If not a doubt, it could be said that the operation of an Air Force base has an effect on the local community through purchases of goods and services. Then why are no economic and social environmental effects and the natural and physical environmental effects, such as fill and part-time employment by both military personnel and civilians, education and recreation, not considered to be interrelated? At this time, I would

like to ask the panel: Who in the Air Force determined that no direct or indirect biophysical effects could be attributed to socio-economic effects?

Col Howell: Mr. Marek, are you able to answer that?

Mr. Marek: Basically, the review of it, that there was no effects in the document, the effects of the base leaving, that there was any significant effects that would effect the biophysical that would relate to the economic. There was no interrelation between them. There isn't a socio-economic effect to the base closing and it is going to be taken care of within the reuse EIS, as per your Page 3-28.

Peter Brasciano: And can you answer, who was the one, who determined that? What office? Who determined that?

Mr. Marek: The breaking out of the EIS into two documents and that the....?

Peter Brasciano: Into the, in regards to socio-economic effects?

Mr. Marek: It was done at Air Staff and it was also decided after reviewing what had, reviewed the document, what had been submitted as far as from scoping and reviewing of the effects on the environment.

Peter Brasciano: Air Staff. A lot of people don't understand what Air Staff means. They're not military like we all are.

Mr. Marek: Headquarters U. S. Air Force. That there would be two separate documents and it is as stated on 3-28, that it would be considered in the reuse EIS.

Peter Brasciano: That still doesn't answer my question. But I'll go on.

Col Howell: I don't understand. Do you want a name or do you want an office, or...

Peter Bresciano: Is there an office at Air Staff, who decided that no socio-economic effects would be covered in this Environmental Impact Statement?

Col Howell: I would assume so. If you'd like...

Mr. Marek: Well, it isn't immediately decided right at the start before the document is done. It is not required under NEPA to do the socio-economic if there is no relation, interrelationship, bio-natural resources, it is not affecting it, we do not have to include it. It is going to be included in the reuse EIS.

Peter Bresciano: I beg to differ with you, but I'll continue. What supporting docu...., what supporting data was used to determine that it was not necessary for the completeness of the environmental analysis to forecast socio-economic consequences? 40 CFR 1508.14 says that the human environment shall be interpreted comprehensively, and to me that means to comprehend such and understand easily the natural and physical environment and the relationships of people with that environment. When an Environmental Impact Statement is prepared, an economic or social and natural or physical environmental effects are interrelated, then the Environmental Impact Statement will discuss all and emphasize all of these effects on the human environment, all I take to mean, the economic, social, natural and physical environmental effects. Nowhere in CFR 40 1500, does it state that an Environmental Impact Statement is required to discuss socio-economic effects only when such effects are interrelated with natural and physical effects. If a physical move of over four thousand people will not have a social or economic impact on Portsmouth and the surrounding communities, then what will? If the movement of aircraft and equipment in closing the base, clearly a physical undertaking, does not have a social or economic impact on Portsmouth or the surrounding communities, then what does? How can the communities in two separate parts of the country be found to be so similar that this section, the socio-economic section. In both the Chanute Air Force Base draft EIS, and the Pease Air Force Base EIS are exactly the same? Why

are these two independently, uh I'm sorry, why are these two identically worded socio-economic comments found in two different chapters in these two bases' draft EIS? In the Chanute draft EIS, the socio-economic statement is found in Chapter 4, Environmental Consequences. And in the Pease draft EIS, it is found in Chapter 3, Affected Environment. Which is it? Which is this exact duplication of words? A statement of environmental consequences or an indication of affected environment? Page 410, paragraph 2...

Col Howell: Mister Bresciano, excuse me for interrupting. Um, we've been on a little bit longer, we have a number of people that would like to speak...

Peter Bresciano: I have two, two more sentences.

Col Howell: If you're almost finished.

Peter Bresciano: I'm almost finished.

Col Howell: OK. Thank you.

Peter Bresciano: Which is this exam...I'm sorry. Page 4-10, paragraph 2, where are the environmental consequences in this paragraph? It appears that this significant negative impact is too hot to handle. Page 4-11, paragraph 2, a very descriptive paragraph of base exchange services. As a part of the Chapter 4, Environmental Consequences, why is not one word written on this impact on the human environment as a result of base closure? I don't buy the Air Force's affirmation that a lot of these subjects will be covered in the reuse EIS. This concludes my comments on the draft EIS. I thank you for your indulgence and eagerly await your decision on responses to these comments as per 40 CFR 1503.4. Thank you.

Col Howell: You have indicated that you asked for a final and you will get one...

Peter Bresciano: Yes, I have.

Col Howell: Uh, Theresa Jones? Is that right? Could I just, I assume you wish to comment on the mobile home park. Before you start, this gentleman in the back has informed me that he has a handout that deals with the mobile home park, so after you're finished, and when we take a break... is that right, sir? Those people that are interested in the mobile home park, if you'd see him, in the blue sweater, and get a copy of his handout, OK? Good.

Theresa Jones: My name is Theresa Jones. I also am here about the mobile home park. I am an owner of a mobile home there and I just want the record to know that this is going to affect me. I am in the Air Force. I have to move and I have this responsibility and I would like to know, I would just like to state that I feel that there should be a change made to include the mobile home park in the Housing Assistance Program.

Col Howell: Would you like to be included as to the written response or the final EIS also?

Theresa Jones: Yes, sir. Please.

Col Howell: OK. I'm sorry. You have something?

Theresa Jones: Basically, my comment is that I would like to let it be known that I want it added, I would like to have it added into that program. I just feel that, in support of all the other homeowners, that that should be included. We are homeowners. That's all I have to say. Thank you.

Col Howell: All right. Thank you, and I've noted for a final EIS or a written response. Tony Jones? Please.

Tony Jones: I'm Tony Jones. I'm a mobile home park owner at Pease

Pease Air Force Base. My question is, in the EIS report, is there feasibility of Newington taking over the trailer park?

Mr. Harek: Basically, the decision of what happens to the property at Pease would be something that would be handled in the reuse EIS. Indeed, the description as it was stated in the original PRC here, is that in order to do environmental assessment for the reuse of Pease, we need to know what the ultimate reuse of Pease Air Force Base is going to be, and that lies locally with the decision makers here on what plans are for Pease Air Force Base. It is not, it would not be included in any alternatives for the trailer park within the closure EIS of shutting down Pease Air Force Base but it would be appropriate to be looked at within the reuse EIS of what the alternative was for all of property, including the trailer court. As somebody mentioned, there was plans of continuing the trailer park and adding fifty more slots to it. Again, that's not our call on the property at Pease. It'll have to go to the Pease Redevelopment and Legislation political decision of what is going to happen to the property here at Pease.

Tony Jones: That answers my question. Thank you. I do have a couple of comments. One of the comments is for the trailer park at Newington. I think it would be a good idea, just with the fact that it would open at least fifty affordable housing for this area and with the possibility of fifty more. It would also give possibly first-time homeowners an opportunity to own, get off of the so-called welfare track up here due to the economic situation in this area for housing. And as far as for us, personally, as homeowners, speaking for myself, I would say what's fair is fair. If we could, you know, a trailer that's bought up here for thirty-five thousand dollars when it was evaluated, was evaluated for location. Yes, well we know here that when we bought the trailer, we didn't buy the land, but we're in a situation with the land, that the banks and with the economic situation, that's how it was looked at. The same trailer that's purchased up here for thirty-five thousand dollars in any of the southern states you wouldn't be able to get ten thousand dollars for it. That, if, you know, if the Air Force so desires, has to go to one of those states, we're saying there's a thirty-five thousand dollar trailer that's only worth less than ten thousand. The only thing that it would end up being is the joke of the neighborhood.

Col Howell: Thank you. You have indicated a final EIS. Do you

want a written response to your thing, or ... the EIS?

Tony Jones: Yes, I do, please.

Col Howell: All right. Again, Mr. G. Bradley Richards, please? Yes sir.

Mr. Richard: Thank you, Colonel Howell. My questions are, I believe, I listed two. And I am currently a member of the environmental cleanup subcommittee working under the Peace Redevelopment Commission. And, in reading through, I believe this is called a draft EIS report, I was unaware that there would be a reuse EIS report also. My concern is the timetable in when the actual scheduling of either the cleanup will begin and what, if any, scheduling is in effect now or will that come later? That's my first question.

Mr. Marek: I will pass that. I believe the question is concerning the Installation Restoration Program and the cleanup of prior sites. Is that the area of your question?

Mr. Richard: Well, I'm interested primarily on if the site has been deemed and classified as either a hazardous material site, what the Air Force is currently investigating as far as the cleanup schedule will be. I really didn't see anything on that in the EIS report.

Mr. Marek: In the EIS report, the topic of cleanup, in particular, the Installation Restoration Program known as IRP, was basically just briefly addressed because of a question brought up at the scoping meetings. The cleanup process is a separate, independent process that would have taken place regardless of the base was going to close or not, and it's going to continue on regardless of the base closing or not. Now, as far as that question goes, relative to the action being taken in a future timeframe, these actions really can't be stated right now, the timetable. We are moving ahead currently and doing some legal actions at different locations on the base, however, we're right in the middle of negotiating with EPA and also in the middle of a process of being put on the national priority list, which will change how the timetable will work and that will be predicated on this agreement that's going to be reached

between the EPA, the State of New Hampshire and the Air Force. As part of that structure, there are timetables that are to be developed from that document. That document will tell us how we go about doing the process, how the mechanics work. From that we'll develop the timetables that will be addressed. Right now we can't say if the timetables, at a point in the future will be all done.

Mr. Richard: Just to follow up on that for a minute, once that, I believe that's turned into a Department Interagency Agreement, once that takes place, would then the, would you forecast that the scheduling that agreement, would that become a part of the reuse EIS?

Mr. Marek: It will not be as scheduled in that written agreement. From that agreement, we, the Air Force, generally it works is are obligated to list dates when we'd be doing certain things. As far as the reuse EIS, I don't know if that's going to be factored into the reuse EIS or not. It's, I don't know how the process will integrate together as far as you know, the commission development area use and how it fits together. I really don't have any answer to that.

Mr. Richard: So, it's really basically too early to tell how the scheduling will take place?

Mr. Marek: The scheduling, as far as, you know, the milestones go in that whole process, the process is going to dictate that scheduling. And, then, we'll have to work our system into that process, you know.

Mr. Richard: Thank you.

Col Howell: Sir, I believe that's going to be addressed in the final, isn't it, Mr. Ditto?

Mr. Ditto: The subject matter of a final?

Col Howell: Yes. Are you going to answer his question on the final

EIS that comes out? Would you like a copy of that? You've not indicated that.

Mr. Richard: Please. One other question, and if there's anyone here on the panel that can answer it for me; has the Air Force looked at the continued use of any of the solid waste sites that are present? I noticed in this draft report that there's over three hundred and some odd tons going out monthly or whatever the timeframe is, to private facilities? Is there anyone here that can tell me whether there are significant amounts being retained on the base now, and I'm speaking about solid waste, for the moment, and whether there are any facilities that can maintain that after closure?

Mr. Ditto: That reference to so many tons being hauled off is our normal daily refuse from the housing area and industrial facility. No, we don't deposit anything on base, it's all disposed of offbase.

Mr. Richard: And has there been any investigation analysis that you know of whether that can be done?

Mr. Ditto: You mean on-base disposal?

Mr. Richard: Right.

Mr. Ditto: No. We never even bothered to look into it because it's not our philosophy to dispose of on-base because of the normal commuting process and the whole nine yards.

Mr. Marek: I guess I'd like to, why are you asking? It sounds like you would like us to stockpile what solid waste, to be...

Mr. Richard: No, I'm only concerned whether any analysis was done because of any future use of those facilities, whether they are, whether the potential is to use any landfills that have existed. That's my question, on base, right.

Mr. Marek: On base, no, there's no, I don't think.

Mr. Ditto: We have no intent to try to revoke on or deactivate our landfills.

Mr. Richard: Thank you very much.

Col Howell: Thank you, sir. OK. That finishes the questions. During the next portion of the hearing, we're going to discuss the oral comments of those of you who have asked to speak this evening and have filled out a comment sheet indicating just comments. During the comment period, Mr. Marek and Major Whitlow and the team will only offer their comments if a clarification appears necessary to avoid any misconceptions. And then, as a reminder, we will answer questions again after the comment period if any other matters arise or if there's anything that's still in doubt. Mr. Manoukian, would you like to make your statement at this time?

Mr. Manoukian: My name is Allan Manoukian. I'm a Staff Sergeant in the Air Force and I'm in the mobile home park. OK. I'm sure you're all wondering why we're waiting this long to press this issue. Because Pease Air Force Base told us to wait, they said they'd have an answer for us in January and obviously they hadn't. So they gotta get on the ball. (Cough) Excuse me. Personally, you can't expect us to pay for a home that we cannot live in, you know, we're pretty much being forced out of it, so. How can the Air Force expect me or any of us to maintain a good attitude on duty or off duty, because they're not taking care of us. I've been a loyal member of the Air Force, maintain a good attitude, set a good example, and I feel that the Air Force needs to take care of this deal and so far, they are not doing nothing about it. They seem like they could care less about it and the base, who needs to press the issue, they need to get ahold of Congress or whoever and give us an answer soon because, you know, this is everything to do with my lifestyle, (cough) excuse me, my way of life and everything else and I would like some answers soon.

Col Howell: I've got you down here for a final EIS and I expect

that to be addressed either there and I'll put a written response note on the top so that if that's handled separately, we'll include you on the list.

Mr. Hanoukian: That's all I got, but, you know, please get someone to help us because it's going to get worse, I'm sure.

Col Howell: Thank you. Roger B. Field, is that right? Roger B. Field, Jr., I'm sorry. Do I have your first name right, sir? Robert?

Mr. Field: Thank you. Yes you do, Robert B. Field. You have my name. I have an office here in Portsmouth and I am serving the Pease Air Force Base Redevelopment Commission as Chairman of the Environmental Cleanup Advisory Committee. Pursuant to the direction of the commission, I am asked to advise you that the commission will be submitting written comments in connection with the draft EIS, closure, on or before February 13, 1990. At the present time, the commission, the Environmental Cleanup Advisory Committee, other state and local governmental and regulatory bodies, and the Bechtel Corporation consultant to the corporation are preparing comments which at this point in time are intended by the commission to be aggregated and synthesized into a joint response. At present there appear to be many areas of the draft Environmental Impact Statement which are of concern and which will be addressed in such written response. Thank you for permitting me to make this statement on behalf of the commission.

Col Howell: Thank you, Mr. Field. I've been asked to announce on mobile home park, the two-paged handout, and I've not seen this, I don't think we've seen this before tonight, but I've been asked to announce that it is not an official Air Force document, so...

Mr. Field: We already have copies of that, sir. We received them last Wednesday.

Col Howell: OK. But as I understand it, it's not, you know, signed and sealed. Barbara D. Hill, please. (Pause) Did you ask me for your sheet back?

Ms. Hill: Yes.

Col Howell: Let me have it back when you're done. (Pause) Uh, what's your name, sir?

Mr. Furman: Uh, Richard Furman, sir.

Col Howell: Richard Furman?

Mr. Furman: Furman. F U R M A N.

Col Howell: Thank you.

Ms. Hill: I'm Barbara D. Hill. I'm a resident of Newington and I'm here in several capacities. And, briefly, I'm a member of the Natural Resource Protection Subcommittee for Pease reuse and again, I would like to reiterate what the previous person said. Our committee will submit written comments to that group but that's another situation because I would like to address two other things. First of all, I'm also a member of the Newington School Board. We have a small community here, and people do wear different hats. So I am on the school board, and in reading the EIS draft, I felt that, along with the other people here, that the trailer park was seriously overlooked. The people that are on the, live in the trailer park, contribute in many ways to our small town, in serving on our volunteer fire department and on our police. But more than that, they, the children attend the Newington school, and on page 4-9, your EIS draft overlooks the specific impact of the trailer park in Newington at this time. About sixteen children attend from the trailer park the Newington elementary school. You, in the EIS report, talked about the closure and the impact of the schools on the base. They did not mention the fact that sixteen children attending the elementary school from the Pease trailer park would mean a serious drop from fifty six students that we now have in our school. And I feel that should be mentioned as a socio-economic impact. The other thing I would like to mention is that in your EIS draft, on page 3-26, the statement states incorrectly that only about ten acres of approximately a hundred acres of Newington's Old Town forest remain. The Old Town forest in Newington,

which is considered one of the oldest existing town forests, actually contains sixty-nine acres, and this town forest section on Pease adjoins the Newington town forest, and this town forest was named in 1987 to the National Register of Historical Districts. And, we would like to suggest that consideration of that area of Pease be considered as an extension of the historic district that now exists in Newington to also include that area of the air base, should the air base be dissolved. Thank you.

Col Howell: Thank you. May I have your comment sheet back so that we can attach it to the record? Steven Geller, please?

Mr. Geller: Good evening. Thank you very much for the chance to speak to you tonight. My name is Steven Geller. I am the Executive Director of Rockingham County Community Action Program, the antipoverty agency serving low income residents of Rockingham County, of which Newington is a member. I have a number of comments to make and I'll try to be quick about them, and like our President, George Bush, I consider myself an environmentalist and as the gentleman so articulately stated who spoke previously, environmentalism must really include the human environment and take comprehensive assessment of the human environment to be truly, to have integrity. And I think this statement has been given unfortunately short shrift to the human environment. I don't know, I don't have much information regarding the specific requirements of federal regulations in terms of the interrelationships of the human and biophysical environments. I wonder, a couple of things occur to me. One is whether the requirement, whether there, if there's a requirement that the human environment or socio-economic impacts be addressed, I don't know whether that actually translates into being prohibited from and I think anyone looking at the specific situation of Pease Air Force Base should be able to conclude that in fact the majority of the physical, negative impacts on the physical environment have occurred not because of the closure of Pease but because of the presence of it, and the major negative environmental impacts are going to be occurring on the human environment, the socio-economic impact, due to the closure. I think it was short-sighted, (cough) excuse me, even if not required not to be given a more comprehensive picture of the impact on the human environment in this document. I also, like the gentleman before me, would take issue with the notion that one could conclude from the evidence that exists, that even so, that there was no real interrelationship between the physical, the biophysical sphere and socio-economic impact. I don't know what timeframe or criteria used but as I look at it, I would have to conclude an urge, as we go to the final draft of this, for a more

comprehensive look at that issue to take place. I also think that in a number of places in the document and some of the panel's comments to some of the audience's comments, so far, have been referenced to the reuse assessment. It almost sounds as if that is becoming now the "catch-all" for everything that wasn't covered in this document and whether or not that's true, I don't think that's the appropriate place for much of the kind of assessment that people have been urging and concerned about not taking place. I don't think that that's the appropriate place for that, for a lot of that assessment. In fact, I think that the notion that to wait until some of the reuse plans and projections have been developed in order to then assess the impact of the closure is precisely backward reasoning and backward logic and a very ineffective way of assessing the true impact on a community of something, of an event as tremendous in scope as the closure of Pease Air Force Base. I will then, I will submit to you that in fact the purpose of a document of this nature is to direct the reuse planning that's taking place in the community, not just react to it as I think is implied in some of the document and in some of your comments. I think it's particularly ironic for that type of situation to be taking place in a military context, that is the closure of an Air Force Base. For me, the analogy is like waiting for an enemy attack in order to assess the impact of what that attack would produce, or waiting to formulate the battle plans until after the battle has taken place. I would certainly submit that naturally the military and all it's forces gives tremendous weight and tremendous forethought and planning to every possible scenario based on the impact of military engagement and I submit to you that the same kind of forethought and energy and effort and resources should be taking place and should have taken place in the production of this Environmental Impact Statement as regards to the human environment, and I don't think that has happened up to this time. I don't think it's good enough, in other words, to say we'll wait until some of the projections for reuse have been put forth before we speculate on what the impacts of those, the net impact would be given the reuse. I think in order to help direct some of that reuse planning, it's imperative that some of the possible impacts of the closure of the base be put out front for the community to look at. I have a couple of comments about some of the specific, do I, is it alright if I take a few more minutes, some of the specific impacts that I think we could project if the resources were put to it. It is regards, economic impact I think certainly from the point of view of the people that my agency serves, I believe that the closure of Pease could be disastrous, particularly in light of, and it's mentioned in here, regarding the overdependence or at least the overrepresentation of retail and service industry, in terms of the growth of the economy in this area which is most likely benefiting people in the lower to moderate income strata and I would say that based

and takeover of the base, there may be some decision making process that could be affected that have to do with the community grid that would be involved in the reuse of that housing and therefore, the amount of compensation that might be required by the Air Force regarding community use of the base and a number of other related housing issues, but in general, again, I want to say that I think there needs to be much greater consideration and comprehensive assessment of the impact on the human environment before the reuse planning has taken place and particularly, it's effect on lower and moderate income residents of this region. Thank you very much.

Col Howell: Thank you. Rene Halland. We have your attachment. Do you wish to have that attached? I think that's the same one, isn't it?

Ms. Halland: Yes, sir. Oh, everybody's got one of my attachments. Yes. My name is Rene Halland. I live at 12 Sumac Drive in the Pease trailer park, and that's the issue I'm going to hit you with again. This has to be addressed now. You're not dealing with a small amount here. You're dealing, actually, with a lot. You're dealing with the whole community. Newington, like she said, has a very small school district. It's an excellent school district. Sixteen children come out of the trailer park. The DOD has now addressed the teacher layoffs in Portsmouth, with a \$5.1 million dollar, what is that, hold harmless fund, for the layoff of teachers due to the closure? What's going to happen for Newington? You're cutting down their school to forty children. That doesn't seem real cost effective. We need to keep this trailer park in perspective and keep it open so that as people come into the area, we can help build up the school, we can have the affordable housing for these people. You cut out the trailer park, you cut out Newington's affordable housing. By federal law, they need it. Then are you going to put in money so that they can go out and build affordable housing? Not too many residents in Newington want it across the street from them. We need to keep this trailer park. It must be addressed now. Not in the reuse statement. It needs to be addressed now. By the time the reuse statement comes out, most of the people there in their trailers are gone. It's a waste of time. It needs to be done now. Now is the time when the effects can be seen and now would be the time in the reuse statement where the effects will already have been felt. If we are shut down, a lot of people are going to be in dire straits, not only the homeowners, but the entire town of Newington, the school system, the affordable housing, this needs to be done now, not later. We are the human

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on that and based on what could be disastrous impacts on that retail and commercial sector, that we could be looking at a very disastrous impact for the whole region, certainly, but particularly for people of marginal incomes who say in fact got themselves out of poverty because of the prosperity, because of the jobs that were made available from the growing retail sector. I think all projections that I can see and assess from my expert point of view would certainly indicate that that sector of the economy is going to be hit tremendously hard by the closure. And, in fact, getting going back to the, you know, um, shipping of the air question, that you'd better address that question, address the various range of possible impacts on, could affect the decision, the kinds of decisions that are made regarding economic adjustment to the local community. I think that becomes a crucial issue. Regarding a specific statement about the impact on schools, on page 3-72, a statement is made that only one of the schools is fully utilized for educational purposes. This may be a question of semantics, but I think there's a misleading conception, at least, in terms of what's going on in Jones School. My sense is that although the entire school building is not used for educational purposes, it could be if the space were available and in addition, one of the specific uses of Jones School at the present time is not mentioned and that is it's used for a Headstart Program Center, the federally funded program that, in fact, is one of George and Barbara Bush's favorites, I might add. There will be an impact from the closure of that school because of the closure of the base, and as the agency or the Community Action Program at the agency that operates the Headstart program, we at this point, really do not know what we are going to do in terms of finding equivalent space for no cost, given the kinds of budget constraints that all federally funded programs now operate under.

Col Howell: Are you almost finished?

Ms. Gellar: Yes, sir. The other whole area, just in summary, that I think has been not addressed sufficiently is the area of housing. And I think now, in the case reasoning that I present that the various scenarios regarding the impact on housing and on how that will affect the ability of lower and moderate income citizens to afford housing in this area should really be addressed in more detail and not wait for the reuse plans to come out which way not, which at that point may not even be looking at housing without the kind of data that might help them to assess that need. I think if that issue were addressed properly, it could potentially affect the Department of Defense's decision making process regarding the kinds of compensation, as we look at the closure

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environment. Please, listen to us. Put us in there. Come out and see what you're dealing with. Don't deal with Portsmouth. Deal with the little people too. We need help. Nowington needs help. It's time to do something about it and to look at this issue. We can't stand for this wait and see attitude any longer. We need to have it addressed now. Now. And I can't express that enough now. If Portsmouth can get 5.1 million, what can the Air Force do for us? What can it do to keep Nowington alive? To keep the community in the trailer park, and to at least make us happy again, it's time to get the issues addressed. Thank you very much.

Col Howell: Thank you. Susan Hannet, is that right? Mrs. Hadland, I've got a, you wanted a final copy? OK. I assume you would like a written response if it's not addressed? OK. I'm sorry. Yes, please.

Mrs. Hannet: My name is Susan Hannet. I also live on Pease mobile home park. My husband and I purchased our home September of 1986 and we had every reason to believe it was a no-risk investment. Since we've purchased our home, the prices in the park is steadily parallel to off base market prices. Presently, it appears that we will have to remove our homes from the base, we will receive no support from the Government other than the actual relocation. If this situation does not change, this will present a considerable loss to many of the residents of the park. I shouldn't say many, all of us. As a member of the Air Force and the local community, we are here to ask for your help and support. Pease mobile home park is located in an attractive, wooded environment. It provides fifty inexpensive homes to help the regions housing prices. It would be a shame to see it destroyed. Thank you.

Col Howell: Do you want a copy of the final EIS?

Mrs. Hannet: Yes I do. Yes.

Col Howell: And last, Ann Marie Scheuerlein? Is that right? I know I mispronounced that, could you? Thank you.

Mrs. Scheuerlein: Yes. Ann Marie Scheuerlein. Hi. My name's Ann Marie Scheuerlein. I also am from the mobile home park over at Pease Air Force Base, and I want to thank you all for the opportunity to be able to

address you. My husband and I have been at Pease Air Force Base for seven and a half years and after living in base housing for over four years, we decided to invest our life savings into the mobile home park. And I do want to stress the fact that I'm saying "investing" because at this point, it was, it is considered that a mobile home is an investment. They do appreciate in this area, they do not depreciate, basically because the, um, excuse me, because of the high cost of real estate. In December of '88, after investing much more money, much more dollars into home improvements, we find that Pease Air Force Base has been included on the list of approved bases to be closed. At this time, we were assured that we would be compensated for our homes and we took this information in good faith. Not until two weeks ago, we were told that as mobile home owners, we are not included in the HAP funding or any other program. HAP was written in 1966. I feel that the Since HA guidelines used in determining which properties located on government land should be compensated and which ones shouldn't be, are out of date. I also feel that the Housing Assistance Program needs to be redefined, according to the present year that we are in, 1990 not 1966, so that a mobile home can also be redefined as to our year as of 1990. Also, as I understand it, Nowington has recommended, whichever has got the paperwork on that, that the mobile home park be preserved with eighteen additional acres to be zoned for fifty more mobile homes. The bottom line is that the EIS has to address the fifty families at Pease Air Force Base immediately. Some, like my husband and myself, are already separated from the military and between the two of us, we have served seventeen honorable years for our country. The financial impact and stress that this is currently having upon us is certainly not of our doing. We literally have our hands tied and cannot recall not relocate nor rent our houses due to the fact that our market is leaving with the base. We need answers as I feel that we are a part of the immediate environmental human impact phase 1, not phase II. Fifty families and fifty family's life savings shouldn't be something to be ignored until the reuse phase comes into effect. We are being affected now. Thank you very much.

Col Howell: Alright. Thank you. Mr. Marek? John Marek. Mr. Marek, what I've done with these mobile home things, uh, mobile home comments is indicate written response on each one of those, and so could you make sure there's either a written response or a final EIS and they each got a copy?

Mr. Marek: Yes, that is what I said.

Col Howell: OK. I've got a number of sheets of people who did not request comments or statements but just written statements. Dan D'Amato; Rosemary Cox Collins; Janice, Janet Wyrick; Robert Shoreline; Richard Furman.

Richard Furman: Sir, I'd like to address you if I could, please.

Col Howell: All right, please.

Richard Furman: Hi. My name is Dick Furman. I'm also a homeowner on Pease Air Force Base and am in the Air Force. Mr. Ditto, are you a part of the Pease Planning Commission?

Mr. Ditto: Pardon?

Richard Furman: Are you part of the Pease Planning Commission? I understand we have some representatives here. I'd like to address them also, if I may, at this forum. Number one, the lending institutions in the area, there's approximately four lending institutions in the area, that are handling all of the mobile home courts on Pease. I have talked to my bank, I am also the attorney for my next door neighbor, who has since PCS'd. We are not allowed by the banks to move our mobile homes, OK? The reason why they're not going to allow us to move our mobile homes because we paid an inflated rate with them and say we move from Pease to Loring, the mobile home would only be worth, maybe, five thousand dollars. Okay? So no matter what happens, the military is telling us that the mobile homes have to be out of here by 31 March of 90, or 91, excuse me, and the banks are saying we can't move them. You're saying, okay, the Army Corps of Engineers, that we're not eligible for HAP, okay. We're dealing with two different laws. We're dealing with New Hampshire law and we're also dealing with federal law, the Corps of Engineers being federal. You are saying that it's not on a fixed structure, so therefore it is not eligible for HAP, okay. The State of New Hampshire has a law which states all mobile homes are legal deeded properties, therefore, they're mortgaged value and are a home, okay. That's what the banks are using. The people that are in the mobile home court are caught between a rock and a hard place. Number one, the banks aren't going to allow us to move them. Number two, the Army Corps of

Engineers is not going to provide housing assistance. Number three, by the time the committee is done with your study and it comes back out, we're going to be gone. Our homes are still going to be there. In order for us not to go bankrupt and have our homes foreclosed on, we're going to have to keep paying on them, okay. I talked to my bank. What am I gonna do, pay the interest on my mortgage? It's about all I'm going to be able to afford to do because I'm going to lose five hundred dollars a month from the Air Force because I'm going to now be living in base housing. How am I going to afford my home? I think it really needs to be addressed. It needs to be addressed yesterday or the day before, but tomorrow at the latest, okay. Something really, really, really needs to be done. That's all I have, sir. Thank you.

Col Howell: I've put you down for a written response also. Yes?

Mr. Marek: I'd like to make a comment. Mr. Ditto is not with the Pease Redevelopment Commission. He is an employee of Pease Air Force Base Environmental Management. Another thing is, the Corps of Engineers. The Corps of Engineers who did the EIS is the Omaha Corps and my understanding is that the Corps of Engineers, again, just to make a clarification, is the New York Corps that is responsible for making the survey here for the Housing Assistance Plan. It seems like somebody's gotten, maybe I can ask the question of you just as a clarification, have you gotten response from somebody in the housing assistance that's come here, that's coming here?

Richard Furman: We had a meeting....

Mr. Marek: In a survey, and got a response saying no, you are not or is this some opinion that you've gotten from somebody?

Richard Furman: We had a meeting last Wednesday with Colonel Wilson, who is the Pease Air Force Base Commander, and he came flat out and told us that at present, the mobile home court is not eligible for HAP. He also stated that if we were eligible for HAP, that it would be anywhere from three to five years before we would see any of the money from the program.

Mr. Marek: OK. And that was his conver...he was relating a conversation that he had with?

Richard Furman: Yes, sir. He told us that he had taken the representative from the Army Corps of Engineers around the mobile home park approximately a week prior, and that he had addressed the problem to him, and that was the response. Pardon me?

Mr. Marek: OK. And this was how long ago? This was six months ago?

Richard Furman: This was last week, sir.

Mr. Marek: OK.

Richard Furman: Thank you.

Col Howell: When did Colonel Wilson say he took the Corps of Engineer representative around?

Richard Furman: Uh, our meeting was Wednesday, so I would assume that it was sometime the week prior, sir.

Col Howell: Immediately prior then?

Richard Furman: Yes.

Col Howell: All right. Thank you. Uh, Michael McKinnon, did we answer your question?

Michael McKinnon: Yes, just a comment, sir.

Col Howell: Did you want to make a comment now? Just a written

comment?

Michael McKinnon: Just a written comment.

Col Howell: OK. Good. Uh, Peter Beagle, Biege? Did you wish to add a comment?

Peter Biege: Yes sir. My name is Peter Biege and I live at 26 Sumac, Pease Air Force Base. I currently have an assignment to Upper Heyford, England, and I will not be able to take my trailer with me. I have no place to move it and I don't see the Government trying to help us out. That's my comment. Thank you.

Col Howell: All right. Thank you. Uh, you'd like a copy of the final EIS? OK. Uh, John Chase and David Gotowski, and we have your written statement. Do either of you wish to make a statement now? Negative. Uh, does anyone else have any questions or will anyone else like to make a comment?

Robert Scheuerlein: I just wanted to answer Mr. Marek.

Col Howell: We need you at the microphone, please.

Robert Scheuerlein: Oh, OK. I don't think anybody really answered your question but the Army Corps of Engineers from New York that did that, they are done and they said no. Just to answer your question. OK? They did the study, it's complete, and they said no, we do not fall under the Housing Assistance Program.

Mr. Marek: OK. Did they give any written correspondence of that or is this again through Colonel Wilson?

Robert Scheuerlein: Not that I know of. This is what we were told at that meeting.

Keith Fumigalli: Uh, Keith Fumigalli. Uh, you've already got...

Col Howell: OK. Fine. Thank you. Any others? Yes, please.

Suzanne D'Aмато: Hi. My name is Suzanne D'Aмато and I live in the base mobile home park and I would just like to read this brief note. We, the residents of the mobile home park at Pease Air Force Base, New Hampshire, are asking for your assistance in the resolution of the current status of our situation. Due to the base closure, we are unable to sell or rent. It is also unsound and economically unreasonable to move the homes, due to the unavailability of space for mobile homes in the New England area. This is seriously affecting fifty military and former military families who have served honorable in the United States Air Force. These families feel that they are getting no assistance or cooperation from the Government that they have served. We have been forced to suffer financially and mentally for a decision that was forced upon us. We want you to review the options and suggestions we have outlined in our letters which we'll be sending to Congress.

Col Howell: Do you wish to give me a consent sheet, and we'll send you a copy of the final EIS? Do you have, did you give me one?

Suzanne D'Aмато: I have to fill it out.

Col Howell: OK. If you'd make sure I get it tonight please? Yes, ma'am, please.

Jean Hardy: I guess I'd like to make a comment to Major Whitlow, in reply to my question. I know the Air Force has the attitude that civilians have had a free ride with the airspace and that you've been generous with your facilities in giving us good radar coverage, which you have, and I do very much appreciate it. And every time I cancel radar advisories with approach, I thank them for the good radar advisories. However, I want the Air Force to realize that you took the responsibility of airspace, and I feel that the Air Force just cannot drop the civilian community and say that we're not going to do anything more with airspace. And I believe part of the problem that I'm hearing with the mobile home

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Col Howell: May I have your name, sir?

Robert Scheuerlein: Robert Scheuerlein. I'm sorry.

Col Howell: Thank you. Any other comments or questions? Yes, please. Could you come up to the microphone please? Sorry to make you walk all that way but it records that way.

Sue Murphy: That's OK. My name is Sue Murphy and I also live in Pease mobile home court. And, listening tonight to all the questions and everything you've asked, it's like, well, we'll look into it, we'll look into it. And, I would just like to comment that when the decision came to close Pease Air Force Base, there had to be some kind of a description of what you needed to liquidate and I don't believe that there was not note of a mobile home court containing fifty families in it. So, now all of a sudden, it's a big dilemma. What're you going to do with us, but this has been a whole year that we've been having this over our head. You know, how come nobody knew there was a mobile home court on Pease Air Force Base that needed to be dealt with? Or before orders start coming out before this?

Col Howell: Do we have a sheet on you, a consent sheet? If you'd give me that with your address, I'll include you in the list of people to be responded to. Thank you. There was one more question back here? Yes sir. Would you come up here please?

Keith Fumigalli: First of all, I'd like to say if anybody, anybody, here on the panel needs a copy of what was said at that meeting, you know, one of us can get you a copy of what was said at that meeting. Another thing I wanted to say is uh, the Air Force, when it comes to airplanes, they don't hesitate about buying them. But when it comes to people, from what I see here, when it comes to people, I mean, they're secondary. They can be replaced. That's what it seems like to me and that's not fair. Because we put in a lot of time and effort for you people. I think you should consider it very seriously. Thank you.

Col Howell: Sir, may I have your name please?

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court and part of the problem that airspace is having right now is that nobody knows who is making the decision and nobody knows what is going to happen. I don't know if the airspace is going to be changed in three months or three years, and this is a very big problem of not knowing what is going to happen, whether it's airspace or the mobile home park and it's a short timeframe and I think everybody understands it's a short timeframe. I just think people want some answers.

Col Howell: Thank you and we have your form. Are there any other comments? Questions? Yes sir.

Peter Bresciano: Peter Bresciano, 101 O'Leary Place. Uh, just to clarify the concerns of the mobile home park residents, public law back in the sixties stated that mobile home parks would not be included in the HAP program. Also, I believe it's Air Force Regulation 19-2 also states that mobile home parks do not qualify for the HAP program unless they have permanent foundations and the individual that owns the mobile home park owns the land under the mobile home park. And that's why mobile home parks are not a part of the HAP program. It's public law, Air Force Regulation.

Col Howell: All right. Thank you sir. Are there any other questions or comments? Yes ma'am, please.

Alverna Bolden: This is tough for me to do because I live out on Pease too. My name is Alverna Bolden and I have a double wide out in the mobile home court. I'm one of the few mobile home court owners, or owners, that has just recently become a resident, okay? And I became a resident of Newington because I love it here and I don't want to move my house. I want it sitting just where it is, I wanted to make it permanent, I love this area and I think if you close the area, you're doing us an injustice. Those people who want to stay. I just wanted you to know that I love it here and I want to stay.

Col Howell: Ma'am, do we have a form from you?

Alverna Bolden: No.

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Col Howell: Would you like to submit one and get a copy of the final EIS?

Alverna Bolden: Uh, no, thank you.

Col Howell: Alright. Are there any other questions or comments?

Dena Moore: Could we get her name again?

Col Howell: Yes, ma'am, could we have your name again for the record please?

Alverna Bolden: Bolden, please.

Col Howell: OK. Please remember that you have until the thirteenth of February to submit any additional written materials to be included in the transcript of this hearing. Today's written statements will be fully considered and addressed in the final impact statement. Once again, oral and written statements or comments will be afforded equal weight. We appreciate your effort to come out tonight and contribute your views to this public hearing and we thank you for your courteous attention and adherence to the rules of the hearing. I think we could say we've each learned a lot throughout the hearing about our document and the hearing was very useful. Be assured that the Air Force decision makers will carefully consider each viewpoint raised here tonight in deciding the ultimate course of action on this proposal. And this hearing is adjourned at three minutes after nine, or as we say, the big hand is on the three and the little hand is on the nine.

(Hearing adjourned.)

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Environmental Impact Statement
Portsmouth City Council Chambers
18 January 1990

The following proceeding was taken at a public meeting concerning the Draft EIS for the closure of Pease Air Force Base, New Hampshire, held at the Portsmouth City Council Chambers, located in Portsmouth, New Hampshire, Thursday, 18 January 1990, commencing at 7:00 p.m.

Col Howell: Ladies and gentlemen, if you could take your seats we'll get started. I apologize for the lack of a sound system. It seems that the controls for operating this battery of microphones we have in front of us is unavailable at the time, and perhaps as we go on later this evening, we will find somebody that has the key and we'll be able to get it turned on and proceed with a sound system. Meanwhile, it sounds like the acoustics are excellent in here. We do have a separate recording system, and for that reason we do have a microphone up here, and I'll tell you what we're going to do with that in a few minutes. Now, the National Environmental Policy Act and implementing regulations require federal agencies to carefully analyze the potential environmental impacts of proposed actions and use those analyses in arriving at decisions or recommendations on whether and how to proceed with actions. The Air Force has prepared and distributed, in accordance with our applicable regulations, a draft Environmental Impact Statement or EIS, addressing a proposal to close Pease Air Force Base. My name is Col John Howell, and I'm a full-time military trial judge for Air Force courts martial. I have been designated by the Office of the Judge Advocate General in Washington, as presiding officer for tonight's public hearing on the draft EIS. I'm not here as an expert in any of these proposals, nor have I had any connection with their development. I'm not here to act as a legal advisor to the Air Force experts who will address these proposals. My purpose is to ensure that we have a fair, orderly hearing, and that all that wish to be heard have a fair chance to speak. Let us take just a moment to explain how tonight's hearing will proceed. This isn't going to be a debate, a referendum or a vote on the proposals themselves. Please do not signify your agreement or disagreement with the speaker's position by applause, expressions of approval or disapproval, or whatever. From my experience, that adds nothing to the hearing record, and simply wastes your valuable time. This way, in fact, is the only time available for your personal input to your government's decision-making process. What this informal hearing, and I emphasize, informal hearing, is intended to provide, is a public forum for two-way communications, with a view to improve the overall decision-making process. You notice I said, two-way communications. Part one of that calls for you to listen carefully to what our Air Force experts say as you are briefed on the proposals and their anticipated environmental consequences. After the briefing, we will take a short recess and then you'll be able to ask questions to clarify in your mind any points made

in the briefing or in the draft EIS. Part two of this process is for you to tell the Air Force experts what you think, to give the Air Force decision-makers the benefit of your knowledge of local area affected by the proposals and any environmental hazards that you perceive. I'd like to emphasize again, that this is a proposal, and not something that's already been decided, approved, or funded. Our hearing isn't for the purpose of justifying anything, but rather to identify and assess pertinent impacts, including your personal perspective as to those impacts. Take notes as you wish during the briefing, and fill out one of our comment sheets please. Those are available at the door, and I believe we have some more right here, and they'll be out on the podium. You may indicate on the comment sheet, if you wish to ask a question or make a statement on the subject area involved. Right after our recess, and after I've had a chance to collect these sheets, I will first recognize members of the public for the purpose of putting a question to the Air Force experts. If your question is of the cross examination variety, that is if its primary purpose is not to clarify a point, but rather to express a contrary point of view, I ask you to hold off until after the question period, when we will receive statements from public officials, designated representatives from private organizations, and members of the public. After all statements are received, I will devote any remaining time to taking any other questions that may have been generated by the various statements, and then the hearing will close. Don't be shy or hesitate to ask a question or make a statement. This is an informal hearing, and there are no dumb questions. I want to help to ensure that all who wish to speak are heard. So, please help me enforce the following rules: First, please only speak after I recognize you. And address your remarks to me. Second, speak clearly and slowly, starting out with your full name, address, and capacity in which you appear. That is, are you a public official, a designated representative of a particular private association, or a person speaking in his or her individual capacity. So our court reporter, Sgt D'Entremont, who has to make a verbatim record of these proceedings, can do her job professionally. Ask one question at a time, and I'll certainly allow a reasonable number of questions. Again, please no argumentative courtroom questions. You'll have an opportunity to make a statement later. Please try to limit your statements to five minutes, so that everybody may be heard. Next, please honor any requests from me that you stop speaking. Please do not speak while another person is speaking, and I will recognize only one person at a time. Finally, our hosts have asked that you kindly refrain from smoking in this hearing room. And I would appreciate your cooperation in that regard. Now, it is possible that there will be questions that the agency representatives are unable to answer. That could occur for one of two reasons. Even though a great deal of expertise is assembled here, they will not attempt to answer questions tonight, unless they are confident they can do so accurately. In addition, there may be questions that have national security implications. And these must be reviewed further before answers are provided. If this should occur, and if the question is relevant, I can assure you that it will be addressed in the final document, which you may request a copy of. And there is a place on our comment sheet for you to request a copy of the final EIS. You will note, from our comment

sheet, that the statements can be submitted anytime prior to the 13th of February of this year, by mailing them to Dr. Slichter at the address on the sheet. Regardless of whether you read your statement on the record tonight or mail it in later, it will be carefully considered, and made part of the record of these proceedings. It will have equal weight, and will receive the same careful consideration, whether made during tonight's hearing or afterward. Your presence here tonight is commendable in that it reflects a great interest in your community, and in those things that are important to it. Let me assure you that your interest here is the sole purpose for us being here tonight. How it's my pleasure to first introduce Major Whitlow, who will brief part of these proposals. Major Whitlow...

Major Whitlow: I'm Major Mark Whitlow from Headquarters, Strategic Air Command, and I work in the Bases and Units Division, and our office is charged with developing the program plan to move the aircraft that are remaining at Pease and to reallocate the resources, both personnel and equipment, in order to close the base in a timely manner. We coordinate with all the agencies at Headquarters SAC to insure that these actions are taken promptly, and we're more of an information-bearer and coordinator than any other function. I have no particular expertise in the environmental impact field, however, this is just one agency that we coordinate with there. I'm gonna describe the actions that we will take in closing Pease just briefly, in terms of aircraft, manpower, and some of the tenant agencies that are available at Pease. We're going to move 13 KC-135s out of Pease; it's a refueling aircraft, I think you're probably familiar with. Six of these are gonna transfer to Fairchild, two each to Plattsburgh, Carswell, and Wurtsmith, and one to Eaker AFB; and that will leave you 10 KC-135 E models belonging to the Air National Guard. In addition to the active duty units and the SAC units on Pease Air Force Base, there's several other tenant organizations with operations at Pease. These are to either be inactivated, relocated, or realigned in some manner. First we have the 26th Weather Squadron, which is a derivative of HAF. They provide the weather observation forecasting capabilities for the base. A small contingent of this unit will remain at Pease in order to support the Air National Guard flying operations. So, the figure you see here will, uh, be diminished somewhat. The actual number of people to be involved will be determined later on when we have the contract for the caretaker force finally determined. The commissary is going, which is a large impact in, uh, the commissary service, uh, to relocate to Hanscom Air Field. The uh, Det 14 in their Air Force Office of Special Investigation, very small impact, are being realigned to another base. Air Force flying training wing is actually the instructor pilot personnel that are attached to the T-37 flying training unit here which is a service as a ancillary training, a continual training, a pilot improvement for our co-pilots too, this will dissolve when we no longer have co-pilots on base. Air Force Audit Agency will be to Dover, the 1916 Communications Squadron is responsible for all communications for the base, both for the alert aircraft that are there now, and for all the communications facilities--telephones, switchboards, what have you. They will be leaving. The Area Defense Counsel is also

being realigned. 3519th Recruiting Squadron was originally scheduled to go to Hanscom Field, there are efforts underway now to retain these people and to try and accommodate them within the Guard containment area. Specifically, whether they will move or not, I can't tell you at this time. We're making efforts, because of the central location with Pease to retain them within this area. A move to Hanscom would place them in a substantially more inconvenient position. So, that is really it to be determined. Some of the additional units, 2d Air Delivery Group, very minor impact, the Defense Customer Supply, very minor; except it is a civilian position that will be leaving. One of the main and largest impacts as far as the civilian community is concerned are civilian workers, is the uh, base exchange. There are again, minor efforts to establish, not minor efforts, but efforts to establish a somewhat minor BX facility, called a troop store, which is more or less the basics, which would support the Guard. Whether this will occur or not, we don't know at this time, so there conceivably could be a small portion of these people that would remain; however, the vast majority will go. The net impact from closing, moving of the tankers, and the other personnel, is as stated on this slide, for a total of just over 2600 individuals. Thank you.

Col Howell: Thank you, Major Whitlow. At this time, I'd like to introduce Mr. Kevin Harok, who will introduce the members of his team, and will also brief the proposals from his viewpoint.

Kevin Harok: Good evening. My name is Kevin Harok. My office is responsible for managing the environmental issues at Strategic Air Command. And one of our responsibilities is in conducting the environmental analyses for Pease closure. Let me introduce the other members that will be able to answer questions and will be listening to your comments. Mr. Gene Stura is the far gentleman from the Corps of Engineers, worked on the noise analysis portion of EIS and EA. Next to him, is Mr. Bob Nebel, he's the project manager, did a lot of biological, historical, other research, for the EIS and EA. Mr. Art Ditto, is from Environmental and Contract Planning at Pease Air Force Base, provided a lot of information that went into the document, the base information that was available at Pease, to be put into the document. There's a Wanda Schroeder, she's representing Headquarters SAC, she's done the environmental, works with the installation restoration program, which is a separate ongoing program for clean-up, and coordinates with some of the other individuals in our office on different environmental issues with Pease, and other bases. And Mark Whitlow, who--already been introduced, who is from Bases and Units. They're responsible for developing the description of the proposed action, which is what he went over. Major Air Force actions, of course this is what we're here tonight for, is to discuss the Environmental Analyses, Environmental Impact Statement for Pease Air Force Base. ...Slide. Major Air Force actions require, are required to be analyzed for environmental impacts by public law and the Air Force regulations as shown here. Basically, we're talking about NEPA, National Environmental Policy Act, also, by the environmental policy act created council of economic... (excuse me) Council of

Environment Quality promulgated regulations to be followed in doing environmental documents, and the third one we go by is, we have an Air Force Regulation, 19-2, and this document says how the Air Force will follow the above two. These hearings are being conducted at Pease Air Force on the draft environmental statement with the closure of Pease; and your comments are being sought at this hearing, as part of the process. United States Air Force preparation of the draft Environmental Impact Statement is complete, completed for decision-making regarding the closure of Pease, and a second EIS is being prepared for the final disposal of the property at Pease. So, it will be two environmental documents, EIS documents. The closure was announced on December 29th as part of the comprehensive package prepared by the defense secretary's commission on Base Realignment and Closure. On January 8, 1989, the Secretary of Defense accepted the commission's recommendations. The EIS process has been modified by public law, which provides that the National Environmental Policy Act, NEPA, does not apply to the actions of the commission, or to the Secretary of Defense acceptance of the commission's recommendations. This means the decision to close Pease has already occurred, and is outside the scope of the EIS being reviewed here tonight. The EIS being reviewed is an implementation EIS focusing on the potential closure impacts taking place at Pease Air Force Base. The slide shows the ones that I just covered of what is exempt from being reviewed in the document. Its purpose is to help the Air Force intelligently cease operation and analyze the local environmental effects caused by the closure and the measures necessary to implement that closure. Appropriate mitigation measures are developed within the document. The Air Force hopes to have the EIS associated with the base closure, completed in early 1990. This state will meet the base closure realignment action requirement that implementation must be initiated by the 30th of December 1991, and must be completed no later than 30 September 1995. Implementing closure involves moving active aircraft force units from Pease to other bases, as covered by Maj Whitlow. Environmental impacts to Pease Air Force Base caused by the departure of these units, are within the scope of this EIS. The exception to the previously programmed force structure change for the relocation of 21 FB-111s. The FB-111s are being assessed in a separate NEPA document, with the cumulative impacts being assessed in this document, this EIS. Environmental impacts caused by the arrival of these units at new locations, are not part of this EIS. You're not getting presented in this document, the review of how this aircrafts are affecting Baker, or where ever other places the different units are going. Those impacts are being analyzed in separate NEPA documents focusing on impacts and issues at the various bases. The second EIS will cover the final disposition of the facilities and the Air National Guard Squadron at Pease. If local authorities do not elect to operate Pease Air Force Base as an airport, then the Air National Guard will be relocated. This process involves laws and community issues quite different from the comparatively straightforward steps involved in the closure. The closure hearing operation and removing equipment and personnel from Pease Air Force Base. The above information is detailed in Chapters 1 and Chapters 2, look like, of the document. This slide shows the outline, general outline, of the EIS document. Closure draft EIS presented within Chapter 3 provides

the baseline information of current operations at Pease. That's Chapter 3. Chapter 4 of this document assesses the impacts of closure to the base. Again, that's the withdrawal of the units. The specific impacts resulting from the previous program, force structure change are discussed in a separate environmental assessment, as noted prior. This is an EA for the FB-111s and the projected date for this EA to be final to be sometime in February. The cumulative impacts are included in this EIS. The cumulative impact of the FB-111s, plus the force structure change. Today we are conducting the public hearing for your input. This input will assist in determining if all the issues and concerns have been addressed in the closure. In addition, anyone may write the Air Force with comments on the draft EIS. To assure that the Air Force has sufficient time to consider public input on the issues to be included in the EIS, comments should be forwarded to the addressee listed on that handout that you have to speak, by February 13, 1990. I will also provide that on the overhead as the last slide. These comments should apply to the closure EIS only. Comments for the reuse EIS will be accepted, but should be addressed separately. When we have the comments on the closure effort by the 13th of February. Let me just show you a couple other slides that list the different sections in both Chapter 3 and Chapter 4 of the EIS. These are the different areas of the environment that were looked at in the document and which has been made available. Next slide... Looking at air, water, transportation, different issues that are being reviewed and seeing what the environmental impact is. We have hired a contractor, the Corps of Engineers, to help prepare our analysis, and they have been invited to collect data statistics, other information, to be included in this document. An investigation of the existing environment and consideration of applicable laws, also coordinate with other federal and state agencies, was done in the preparation for this study. We feel that we have identified the applicable environmental issues within the draft EIS and assessed the probable impacts of our proposal. The proposal is closing down Pease Air Force Base. The draft statement has been published by the Air Force and been made available to the public. Copies were also made available to local libraries and town halls. Let me just quickly go over some of the dates, and I will review what I just covered and where we're going. Basically, January 8th, the Secretary made the decision, that he accepted the commission's report to close Pease Air Force Base. February 8th '89, it was published in the federal register. This is required by NEPA. This puts on notice the public the action has been proposed and that an environmental document would be completed. In February and March scoping meetings were held. This is to get public input. February and March, public scoping meetings were held here and in Newington. 22d of December, the draft EIS was filed with the Environmental Protection Agency, as required. They issued it to be published, a notice to be published in the federal register, which was December 12th... Excuse me, December 29, 1989. The draft EIS was filed with the Environmental Protection Agency and published in the Federal Register. 45-day comment period for feedback is allowed on this publication, after this publication, and will be complete by the 13th of February. These public hearings are being held as part of that process, to give you an opportunity to verbally comment on the draft statement.

Written comments are accepted and get the same official consideration as verbal comments-- comments that are written, given tonight, or sent to us by the 13th of February. After the comment period is over, the Air Force will amend the draft to address this additional information that has been received and publish a notice, final environmental assessment. Again, it will be published in the Federal Register. Projected dates for this are April, to be filed again, with the Environmental Protection Agency and published in the Federal Register giving the official notice the final EIS has been completed. Then the final environmental protection statement is filed with the Environmental Protection Agency and published in the Federal Register. Air Force will prepare a recorded decision upon the completion and filing with the final EIS. The action the Air Force takes is based on that record of decision. After all the comments are completed, they're compiled into the final document, a decision is made based on the information given and the action. This concludes my briefing. Let me just put the slide up again. You should probably get a copy of the handout so you could speak tonight. And that does also have the address to send to Headquarters SAC, which is Strategic Air Command, so we can get your comments to this document. Thank you very much.

Col Howell: OK. Thank you, Mr Marek. Now is the time to get to work. Can I ask Capt Marchand and whoever else, to help me pick up those comment sheets. Those of you who'd like to speak or ask questions, could we have your comment sheets at this time, please. Will you pass them over to the center aisle? That might be the easiest way. (Pause) OK. Could we take just a five minute break and let me sort through these? Do I have all of the comment sheets now for people who'd like to speak? OK, let's just take a five minute break, if we could, please, and let me sort these.

(Break)

Col Howell: Sgt Scheetz, are you getting a good recording out of this?

(Pause)

Col Howell: OK, if everybody would take their seats please, and let's get started.

Jeffrey Ott: Col Howell, my name is Jeffrey Ott. I'm a member of the Environmental Cleanup Committee that's underneath the commission. And as you may be aware, we're holding our own public hearing, next Tuesday. I might wonder if I might, before things start, just stand up and give a brief announcement of that.

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Col Howell: Sure.

Jeffrey Ott: Is that possible?

Col Howell: What was your name again, Sir?

Jeffrey Ott: Jeffrey Ott.

Col Howell: O-D-D?

Jeffrey Ott: O-T-T. Ott. OK?

Col Howell: OK, uh, let's uh, let's take our seats, and let's get started please. Um, before we begin with the questions, I have a request from Mr Jeffrey Ott, to make a short public announcement, and we'll certainly honor that. Mr Ott, would you, uh, would you like to start?

Jeffrey Ott: Thank you, Col Howell. I just wanted to mention that I'm a member of the environmental cleanup committee that's part of the Peace Redevelopment Commission. And our committee is holding its own public hearing this coming Tuesday, that will be January 23rd, 7:00 in the Newton Town Hall. And the purpose of this public hearing will be to get input on environmental issues, um, if the people, anyone in the Seacoast area wish to comment, and uh, couldn't be here tonight, or doesn't feel comfortable in this forum. It's somewhat of a smaller meeting, and uh, we would encourage input. Beyond that, our committee could also be written to with any comments that people don't feel are appropriate for tonight. Thank you.

Col Howell: You're more than welcome. OK. This is the time we've set aside to allow you to ask questions about the content of the briefings you've just heard, and the draft environmental impact statement. It is not intended to be a public comment or statement period, cause that will come in just a few minutes. But, it's merely to provide more detailed information in response to your questions. And I would ask that you please limit your questions to the briefing or the draft EIS. Now, the first group of people that I'm going to recognize will be those whose comment sheet indicated a desire only to ask a question. After we've been through the questions, then we'll go to the questions and comments. Now, those of you that have signed up to speak, may reserve your questions until the end of the remarks, uh, so that this time may be used by those that will not be speaking, and so, once you're recognized by me, please step to our podium in front. And I'm told the

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first optional use of any property on base closure. Is this true sir?

Mr Mared: All federal agencies, are, have been sent letters to review, they have first option on the property. That would be Department of Interior, per... any department would have the first option to take a look at the property and see if it is in their interest to obtain that property. Letters had gone out, I believe in mid-November, with some due dates back in mid to late December. I'm not privy to who all has responded. My understanding that some have responded, uh, some have responded requesting additional time to review it, uh, pending different details, because also other federal agencies may have to make arrangements for funds transfer to have property. It's a little difficult to give them, you know, notice and budgetary other things. But, yes, there is an inquiry out to federal agencies to see if they, they want it. Uh, the Air Force, my understanding when you're saying DOD, if you trying to segregate out Air Force, Air Force, uh, to my knowledge, the whole property is being disposed of, other than for the Air National Guard.

Glen Malmad: I do have another question.

Col Howell: Please.

Glen Malmad: Since the light has now been put on the trailer park, is it at all possible that the trailer park are just deeded the property, since they are DOD personnel?

Col Howell: Can you answer that?

Kevin Marez: I can not answer that.

Col Howell: I don't know whether we have an answer to that. Will you make a note of that, and, uh, I think that's a valid question. I think we ought to take a look at it. (Pause) That's, as we used to say, I think it's above my pay grade right now, but I think it's worth uh, worth looking into.

Glen Malmad: I have no more questions, and I appreciate it.

Col Howell: Alright, thank you. Um, Mr Michael Hadland, please.

Michael Hadland: Hi, I'm Michael Hadland. I'm here for personal

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microphone is working. I think it is; it's somewhat hard to hear. Uh, since we want everybody present to be able to hear what's said and what your question is, and it's very important that we record it for the record. If the sound is acid, and is not heard in the record, is there a sound? --I don't think so. So anyway, let's make sure we get it in the record. Uh, and I remind you to please state your name and affiliation or address, and ask your question. We had a fascinating meeting last night. I, I see some friends from last night that were here--and the first group of questions come from the folks at the mobile home park. And I'll recognize first, Mr Glenn A. Malmad. Mr Malmad, are you here?

--Please.

Glen Malmad: Glen Malmad, from Pease Air Force Base. And I'm here for personal concerns. If it's in the scope of the EIS to analyze the impact of the local environment, why was the Pease Air Force Base trailer park not even considered in the draft, that's this statement?

Mr Marez: The property of Pease, of closing down Pease was considered, the individuals at the trailer park is an asset of the government, and your concern of the trailer park is being looked by Headquarters Air Force, uh, I did check that since our last hearing yesterday. It's being looked at by, as I say, Headquarters Air Force installation management. They haven't forgotten it. They've come up against a few stone walls; they have not come up with a solution as of yet. Again, as said last night, we will look at it to see if it is appropriate to put into the draft EIS, you will receive a letter comment. At least, that's the only thing I can say that I've learned since last night. Uh, I've also understood that you've taken some other actions, um, congressional, I gather, as they're called in our terminology here. Since then, and I think some of those have been received. But that's all I can elaborate from what, you know you were told last night. And it is for the record of your, your comment. The arrangement we made last night,

Col Howell: The arrangement we made last night, don't know if you were there or not, was that you'd either be receiving a written response, or it would be included in the dra... in the final EIS. And I notice you marked it final on here, and you will get a copy of the final, or a response, or both. OK, do you have any other questions?

Glen Malmad: Yes sir, I do.

Col Howell: Please.

Glen Malmad: I understand that, that the Department of Defense has

reasons. I'm a resident of the Pease Air Force Base mobile home park. I have a very simple question, are, is the Department of Defense going to do anything to take care of the fifty families out there that are going to be financially devastated by the Pease Air Force Base closure due to the inflated mortgages of the New Hampshire area. We can, uh, a lot of the mobile homes, have been appraised around the \$40,000 mark, the second that mobile home moves off of that property, it might be worth 10, maybe 15,000 elsewhere. Uh, that's my question. Are we gonna be taken care of?

Col Howell: I'm not sure any of us have an answer to that right now.

Mr Marek: I really don't have an answer to it, I guess, again, as I said last night, I'm surely sympathetic to it. I'm sure the Air Force or no other individual would want to put a hardship on somebody if there is a, if it appears that there is a real loss of value to it. I don't think anybody has questioned that. The responsibility of lying for compensation, the decision on that has not been said. I can reiterate again, that an office in, at Headquarters Air Force, is reviewing it, trying to work something, and also my understanding is that congressional letters have been written by the group in the trailer park and are starting to be received by official. Now, whether that brings on action, that is, you know, not part of the environmental assessment process, that separate action, being what happens politically.

Col Howell: I think this certainly has identified the issue. It will be in our verbatim report. And I can promise you, as we've done with the other residents of the trailer park, that you'll get a written response, or, it will appear in the final EIS, and you will be getting a copy of that.

Michael Hadland: OK. I do also wanna make it understood that the Pease Air Force Base mobile home park is very, very unique. This couldn't happen, I don't think anywhere else in the United States. It's just that the housing industry has been booming and the prices have gone up. The prices out there are very realistic in my opinion. I live there, and people can afford to live there, and they would continue to afford to be able to live in that area, being that the prices will stay approximately where there at now. That's just another comment.

Col Howell: Of course, the alternate issue is people who have received orders that have to leave, and there's no market for the trailers, and I think that's why your question as to whether the property could be deeded to them is a very valid one, and I think should be answered, because that would then provide a market for them, if I'm not mistaken.

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Michael Hadland: Thank you.

Col Howell: Is that correct?

Michael Hadland: Yes, Sir.

Col Howell: OK. Thank you very much. OK.... Mr Tom Jones, please. You're not related to the singer, are you?

Tom Jones: No, sir. I can't sing. Good evening. Like he said, my name is Tom Jones. I'm currently a resident of 16 Sumac on the mobile home in Pease Air Force Base. I just have a question for you. Just, uh, probably a question you had last night. I wasn't able to come. From the first time I've been aware of the base closure, of Pease Air Force Base, us trailer park residents got together and tried to find out information, what was going to happen to our trailers, mortgage, and so on. Well, through our chain of command was said SAC Headquarters would come down and say what they had to say during a base closure meeting in the theater. When they came down, we asked questions, and they were saying, well, we weren't aware of this, we'll get back on it. And it seems me, that's all I'm hearing now, too, we'll get back on it, we'll think about it, you know, we're trying to work something out. From the time now, to the time, the first time it was established that we are closing, couldn't something have been worked out for us then, and not wait until we're almost ready to move? And what I'm trying to lead on is to, why isn't the HAP Program, Housing Assistance Program gonna be able to work for us if we can maybe not fulfill, meet that program, maybe help us out with it. I'm looking to have somebody to pay off my mortgage, but kind of help me out. Instead of making me PCS into overseas and still pay a \$25,000 mortgage.

Col Howell: Can I ask, from the hearing last night, as I understand, the Corps of Engineers were responsible for making the determination that you did not fall within the HAP Program. And as I understand that, that's only occurred within the past two or three weeks. Does anyone know when that decision was made?

Tom Jones: No, sir, uh... The Corps of Engineers came down here three times total, trying to work with us. I couldn't give you the dates right now. I'm kind of unprepared, so I, uh... They came down three times, and all the times they said no, I'm sorry, we cannot, you know, help you out on this program. Now, I'm looking at this program also, from the time it's been made, what 1964? I believe it was established in the 1964-66 era... That year, not too many service people were into mobile homes, to say, hey, this could be my home. Now, from that time to 1990,

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And I know it's not gonna move as nearly as fast as you would like for it to, but it is moving.

Col Howell: The only thing I can say to you now, for the record is that you will get a written response, or it will appear in the final EIS, and you haven't checked that. Would you like a copy of the final?... OK. And I'll add written response so that we're sure that you get an answer of some sort from us. I'm not sure what it's going to say, but we can address it the best we can. OK. Thank you.

Kevin Marek: Let me make another statement, like I did last night. The Corps of Engineers here tonight, is from the Omaha Corps. Under the HAP Program, it would be the New York Corps that came out. So, if anybody's directing a question on the HAP Program, these people tonight are preparing the EIS, and are not from the group that makes a determination or reviews any of the HAP Program requirements. Thank you.

Tom Jones: Can I make one comment, on a question? Do you know how many times, the Corps of Engineers came to Pease Air Force Base for the trailer park?

Kevin Marek: No, that's just what I said, these are from the Omaha...

Tom Jones: I know, but don't they talk to each other? And say, hey, this is what we determined or this is how many times we came there already? I mean if... It seems logical to me.

Robert Nebel: We, we talk to each other when we're working on different... acting on different laws. We're acting on the policy act, our district. And the New York district was working under the HAP Act. And unfortunately, we did not communicate.

Col Howell: The short answer is no.

Tom Jones: Thank you.

Col Howell: Thank you. All right, let's move into questions and comments. Mr. Bill Wagner, please.

Bill Wagner: Thank you. I am Bill Wagner. City Council, City of Portsmouth, was on the Pease Commission from its beginning until a couple of weeks ago. The questions I have are of methodology. Throughout three,

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a larger majority want mobile homes so we can say, hey, I got a house for my family. I don't have to worry about rent, or having to lose my lease or anything else like that. Now, I fell into Pease Air Force Base in 1926 from Arizona. There too, we had a trailer park--I wasn't associated with that one. And now, I couldn't afford to rent off-base, not for a one-bedroom. And my daughter and my wife, so it was more economical for me to purchase a mobile home. And now, it's like, I'm, I'm lost, I don't know what I'm gonna do. If I go overseas, I'm, I've got the shaft.

Col Howell: If I could, um... Do you have something that you wish to add?

Major Whitlow: I'd like to add just a little bit to what Mr. Marek said. I talked personally today with the individual working the housing issue at the Pentagon. He's been working this for well over a year. He hasn't been sitting still. People have been working. You don't hear about it, but they are working. And I know, you'd feel better if you thought somebody was working. They have explored several avenues of this. HAP being one of them. In every instance, the avenue, the vehicles they've taken, they felt in the end would work to you detriment--you'd come out on the shorter end of the stick then you would even with half. They received the first congressional inquiry today, and welcomed it. This issue and the form that it takes to get resolution of your problem, is probably gonna have to be elevated above the level that is working now. And that will happen through the congressional inquiries. And that's all I can tell you now. It has been looked at in the past, and it's going to get more attention, certainly as a result of your efforts, and of these hearings.

Col Howell: If I could add one note to that, as a personal note. I came on active duty in the Air Force in 1966 and I met at that time, quite a number of people who came from Roswell, New Mexico, who had owned houses around Walker Air Force Base, and as a result of their agitation and the problems that were associated with those closures, in Roswell, in particular, the HAP Program was passed. And as you say, correctly, that nobody considered that it would ever apply to mobile homes. And, I think that's what Major Whitlow is suggesting is that sort of interest, and that sort of level, and that sort of action is gonna be what's required if you look at the HAP Program.

Major Whitlow: And that's part of the problem, why it's taking much longer. And it's certainly much more personal to you, because of the uniqueness of your situation. This is not addressed everyday, and it has not been addressed in the recent history--the recent past. So, the uniqueness of your situation and the current existing laws, as they were written, is precipitating a lot of confusion. It's got to be sorted out.

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your or five times, it's mentioned that there was another EIS made, and I know, Maj Whitlow, or someone mentioned that the PB-111, Environmental Impact Statement is a separate document that I have never seen, and I don't believe anyone on the commission has seen. Is that coming out in February?

Kevin Marak: Yes, it will, and it will be as it was stated again last night, the same question. It will be made available through the clearing house, it will also be sent to the PRC and to the base. It will be made available upon request.

Bill Wagner: When was the public comment hearing on that document? It must have slipped somebody's mind. I don't recall.

Kevin Marak: No, there was no, there is no required public comment period on that.

Bill Wagner: And why is that?

Kevin Marak: It's not for the environmental assessment?

Bill Wagner: In that assessment program is there anything on economics? Is there anything on those kinds of things that are avoided in this EIS statement?

Kevin Marak: I think you got a little bit of a loaded question in there.

Bill Wagner: It certainly is. There's a similar document to this. It does not address social economics.

Bill Wagner: When may we get a copy of this?

Kevin Marak: When it's available in February. See, it's in review right now. It's just like any other document. I'm sure you're aware of being in city politics, you don't give out draft documents. You wait until the final wording is said so it can be reviewed at the appropriate time. It is being reviewed. It is close to it.

Bill Wagner: OK. And who is, is the Corps of Engineers doing that also?

Kevin Marak: Yes, they are.

Bill Wagner: Same cup of people.

Kevin Marak: Yes.

Bill Wagner: Is there a correlation between the two, because throughout your report your talking about assessing the use, you call it the cumulative impacts, which is the PB-111 and the current we're talking about with the closure. How do we know what the cumulative impacts are. How will we combine them with the statement that's coming out on this that we're having a public hearing about, and the other one on the PB-111s that is coming out in February? What is the methodology to tie those two together?

Robert Nebel: OK. In the draft you have, we looked at additive effects. If you look at the noise tables and the air quality impact tables you'll see where we have PB-111 aircraft in those tables to show you what the decreasing levels of both the PB-111s leaving and the KC-135s, the noise and the annual emissions, you'll see the emissions from both planes tabulated in those tables. That's what we mean by that, cumulative effect, the added affect.

Bill Wagner: Only in noise. What about the economy, the dislocation of families and those kinds of things. Is that cumulative also on this, or is it just on...

Robert Nebel: We present the manpower, the cumulative manpower loss. But as far as social economics, no, we don't present it. The cumulative social economics effects we do not present in the EIS.

Bill Wagner: So, then it would be fair to say that the cumulative effects you're talking about are those on noise and spills and those kinds of things. That's the only cumulative effect you're talking about.

Robert Nebel: Correct. In the environmental area.

Bill Wagner: In that statement on the PB-111s there was no socioeconomic impact. Is that correct?

Col Howell: Look, could I just interject for a second? You all understand that there is going to be another EIS that addresses the relocation of...

Kevin Marek: Yeah. Again, there will be, socio-economics will be addressed in the reuse EIS. As in my talk, the PB-111's is force structure change, and that is being done as an EA, Environmental Assessment. EIS is for both the cumulative effect and the base closure. The third document which again is an EIS, Environmental Impact Statement, will be for the reuse. We're looking at some time, and starting that process in spring, for the reuse EIS.

Bill Wagner: If that reuse EIS is cited with the one that we're paying Bechtel to come up with, who would be the mitigating decision-maker...the Air Force?

Kevin Marek: Did you say that Bechtel is doing an EIS?

Bill Wagner: I'm saying that the reason that they're doing a study and the reason that your reuse study isn't being, isn't here now is because you're waiting for the reuse development plan coming from Bechtel. Part of that has to do with economics, part of that also has to do, also with the environment, and so forth.

Col Howell: Excuse me. Is the Bechtel plan, is that funded by the commission, or, who is that funded by?

Bill Wagner: Hopefully, if you can intercommunicate, the FAA is holding us up for about \$600,000, so that part hasn't started. There has been funding by the state, the city, and the federal government, but not enough to this point. So, I would hope that in the record, if you people were playing off the redevelopment plan that we're trying to get paid for, that you would talk to the FAA and others to pay for it. The way it's represented right now, if you took a million dollars to see if Portsmouth is paying for 10 percent of the action.

Col Howell: Do you know about Bechtel?

Kevin Marek: No, but let me make another comment.... The Air Force will start the Environmental Impact Statement for the reuse of Pease. They will also, like Bechtel is working on the plan under your direction, the Air Force is also doing an Air Force final disposal plan. It will first come out as a preliminary disposal plan. That will be used along with whatever is ready with Bechtel to initiate doing the environmental

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assessment for the reuse of Pease. One of the hardest things in nailing down, to work on an environmental assessment, I guess I can confirm with Bob, I've talked with many times, is what is called a DPAA, an acronym, which is a description of proposed actions and alternatives. And basically, that's something in the planning process, which Bechtel was doing for you. They're going to give you, again, I haven't reviewed Bechtel's documents, but they've given you a number of preliminary alternatives, I understand, etc. You have nailed those down to maybe three or four options. This, then, maybe would be along the base of the DPAA, the Description of Proposed Action and Alternatives of that the final disposition of Pease Air Force would be. As I said, at the same time, the Air Force is also looking at, since the Air Force is the owner of the property, is looking at what the Air Force final disposal plan. What is the highest and best use, a number of other things, to make the two fit together. That's why, again, you have special legislation in this state to try to have a single point of contract through the Pease redevelopment commission, the same as other commissions are being set up at other places where the bases are being closed--so they can get some kind of consensus of what is gonna happen here. And that's where the social economics environmental...and it will be included in the environmental assessment. I hope that elaboration...now you're gonna have another question. I hope that helped a little bit.

Bill Wagner: Well, I think it's a good re-hash of the scenario that's supposed to happen. But, we've seen a lot of them that have been delayed, four, five, six months. So, hopefully, those timetables will be met. Now often has the Corps of Engineers done an environmental assessment for the Air Force?

Kevin Marek: I don't know if that's for the Air Force. I'll let them answer what their experience has been. It's listed in the document the preparer ...

Robert Nebel: The Omaha District is currently preparing this EIS, and also a realignment EIS for March Air Force Base in California. Our district is also preparing an EIS on three Army bases that are closing. But, our district prepares EISs of all kinds, and we've been doing them for, since 1970, since the initiation of the National Environmental Policy Act.

Bill Wagner: So you basically do it for federal agencies?

Robert Nebel: We do it for our own projects and state federal agencies.

Bill Wagner: But your agency will be following through on this one

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and the reuse ones. Is that correct?

Robert Rebel: No, our mission right now is just the closure EIS. Who will be doing the reuse EIS has not been determined yet.

Bill Wagner: But you did the one that we haven't seen yet and the one that the draft is out tonight. But we don't know who's doing the next one. Is that correct?

Kevin Harok: We do not know who the contractor will be. It may not be managed by Headquarters SAC. At this time, it's presently to be managed by AFRCCE, which is a regional civil engineering ballistic missile office at Norton Air Force Base, to consolidate all closure EISs with one management group. Stop at that... But I'm... Go ahead.

Bill Wagner: Could you explain, just in laymen's terms, what this on in socioeconomic I think I may have read in the paper you might have explained it last night, but on page 3-2d, if you have it there under socioeconomic it says, during preparation of this EIS, the Air Force considered whether there might be any indirect biophysical effects which could be attributed to socioeconomic impacts. No such effects or interrelationships were found. What does that mean?

Gene Sturm: Basically we were looking for effects, like, for example, EIS that's being done on March. What they're doing on that caused air, potential air pollution problems in the area where they already have a high level of pollutants. There we have a social economic effect causing the final effect. And basically what that says in this case, was that type of impact, secondary impact, was not identified.

Bill Wagner: Socioeconomic is defined as how?

Gene Sturm: Well it's the human environment, the jobs, the impacts on the economy, things like that. But we were looking for a secondary impact, something where, for example, creating a large number of jobs in an area will often cause land use impacts, will cause, like you say, air pollution impacts, things like that. We didn't identify that type of secondary impact.

Bill Wagner: ...people have more different questions to ask. I have problems with the methodology. I have problems because being involved with this issue for the last year, quite actively, it seems to me that the methodology used, doesn't make sense to me. I'll give you two reasons why. One of them was written down for which you base your

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conclusions. The conclusions of the way I read them are, you made conclusions on the fact that the base is leaving, therefore, noise levels, and the air pollution, and so forth is going to decrease. And I know that the other cumulative effects we'll find out with the reuse plan. I know that the Corps of Engineers out of your offices called last March or April or whenever you started your contract and to find out about the economic impact on the school system, they called up a city official and asked what was the aid that was given by the federal government, and how many students did they think would be leaving. I look in your report on the schools. The only thing that's mentioned are buildings. It's a vital concern to this city. I don't know what kind of detailed, in-depth knowledge gathering was done, but I'm not too impressed that that's all it was on the schools. On the other ones, on page 4-3 it talks about employment. Any potential adverse impacts should be diminished by the placement of some in other federal jobs, the type labor market and rapid economic growth being experienced in this area. It talks about litigating factors. I humbly suggest that you rewrite 4.1 in the economic impacts, read the papers about the state, the city, and this area, that we're not in the boom time; and to assume that the economic impacts would be mitigated by some miraculous reuse of Pease Air Force Base, considering if you read in the paper, are also aware of your fellow federal bureaucrats are going after the Portsmouth Navy Shipyard. I think you should put that into your analysis, also. In short, we doubt for this city with a Corps of Engineers with a simple project--I was called making a couple of ball fields. State and state officials, local officials, and then the Corps of Engineers got involved. They did not accept the methodology. They did not accept we had to make test, after test, after test. And for the record, if your input of this unemployment, we have not seen the PB-111 statement. If the methodology is to believe everything that was said, I could quote others where, we don't think there's any PCBs because we were told that they didn't dump that kind of stuff there. Throughout this, there are such qualifying statements, it indicates to me that no in-depth study has been done. And I would ask that if you have more facts, the City of Portsmouth came out with four or five volumes of information. Whether you believed it or not, is your prerogative, but at least it was more detailed than this. The Corps of Engineers, I'm sure can do a good job. We don't know if they're gonna finish and do the next one, what I'm telling you is, that the methodology and the biggest hole, the loophole that you have is this PB-111 report, that you continually referred to, that we have not seen. And all I ask is if those two examples are wrong, of your analysis of the school impact, and the type labor market, I would ask that you review the analysis and make a change before the final one comes out. Because it's not up-to-date, it's not accurate, and I don't think it addresses the issues that were spoken. Thank you.

Col Howell: Thank you, sir. Could we have Mr John E. Hardy Jr. Is that right? Is it E?

John Hardy: My name is John E. Hardy Jr. I live in Elliot in 20

Littlebrook Lane. I'm here as a private citizen. I also am an airport operator in the area and I'm a commercial pilot that uses the facilities of the Pease area. My first question is, are the area traffic controllers part of the 1916th squadron that you mentioned in your slides?

Maj Whitlow: Yes, sir. I believe they are. They are a derivative for communications and air traffic control operations.

John Hardy: OK. And their equipment, the radar scopes that they operate and so forth is part of their of their communications equipment. Is that correct?

Maj Whitlow: Yes, sir.

John Hardy: You... I believe also, that you said that when the base closes, that this communications that would include the air traffic controllers and the equipment will be gone at the time of base closing.

Maj Whitlow: Not in its entirety, sir. The radar approach control facility as of today, is scheduled to be inactivated. The tower and ground control facilities will be maintained by caretaker, private contractor force. We cannot contract for FMA coverage airborne, because only the United States government does that as opposed to private citizens. There will be a contract, as I said, for tower and ground control coverage. Presently, it is planned, however, it is not definite that the radar coverage will only go down to 3,000 feet.

John Hardy: I think I understand that. My question was strictly for the radar facility and the approach control facilities. So, I think my next question is, how can the Air National Guard here, operate, or any civilian use of the airport operate without any instrument approach to the southeast runway, runway 16, once you close this facility?

Maj Whitlow: As I presently understand the situation, I am not a radar approach--I have no expertise in that field. So I'll tell you what I know, what my experience has been. That they will be capable of vectoring to the final approach. And from there, they can proceed on their own. But there will not be any technical radar coverage below 3,000 feet.

John Hardy: My question then would be, what would the final approach fix be to 16? What would they vector them to?

Maj Whitlow: As I understand it, I'm not familiar with the approach. I believe it's around 1,800 feet, is the final approach fix altitude or the initial approach fix altitude.

John Hardy: That is to the north runway. To the south runway, there is none. So you would have a facility that would, in my comment now, would be useless for either the Air National Guard or civilian use without radar.

Maj Whitlow: It's not useless. It would depend, of course, on your weather conditions as they exist. I point short or close to, depending on weather can filed to, and then at that point, proceed VFR. I will readily agree with you. There are very severe limitations when you have radar outages below 3,000 feet.

John Hardy: My other, maybe my second comment would be, as you just said, with no radar coverage below 3,000 feet for this area, with the number of operations projected for Pease in this report that we've looked at. The other operations, air operations, in this area which have continued over the years in a very busy corridor, that the probability or maybe I should say, possibility for a mid-air over this area would increase tremendously the day that this facility closes. Thank you.

Col Howell: Thank you. Mr. Hardy. Can I just ask you to make the mark you made last night about presidential support for radar coverage? Repeat that, please.

Maj Whitlow: Currently, Headquarters SAC has formerly from the Presidential Support Unit at Andrews, if radar coverage is required for presidential support. The President will be making periodic trips to Pease, and then from there to Kennebunkport. We have not received an answer on that. I won't make supposition on that answer at this time, but there are other avenues, as the gentlemen said, being explored, in the interest of what we all feel, is a safety issue.

Col Howell: Does that help, sir? Mr. William Stillman, please.

William Stillman: Good evening. My name is William Stillman. I live in Portsmouth -- Hillcrest Drive in Portsmouth. My interest is a private citizen. I will carry on where Mr. Hardy left off. How many national guard operations are planned per day, if it goes in that direction. I've heard number in the order of 100

Maj Whitlow: There are numbers in the report, I can pull them out, but I can't tell you how many go in that direction. How do you define operations, sir?

William Stillman: Penetrations through the airport traffic or landings and take-offs.

Maj Whitlow: Takeoffs and landings is considered a movement. An operation can be interpreted several ways--as a flight, a sortie, a mission, it can be what you might call one movement. It's the...The Air National Guard is only going to have 10 airplanes. That would mean that those airplanes are gonna have to fly 10 times. If you call a mission a movement. Whether all 10 airplanes are gonna have to make 10 takeoffs and landings or touch and go's per day. That won't happen. I think that figure, is, probably refers...maybe refers to movements, which is a takeoff and landing. Which three or four flying a day could practice that amount. I can't address that without knowing the definition of movement. Now, I don't think they can either.

William Stillman: My apprehension here is that my house is on the pex, which would be the mid-field position for a landing on runway 1-6. And with aircraft, including KC-135s and small aircraft, such as mine, reaching that same point without radar service, I think that as Jack Hardy said, the risk of a mid-air at that point, is much increased over what it is now. The report talks at some length about air traffic up and down I-95. And I grant, there is some of that. There's also a good deal of traffic in the summertime, particularly by aircraft from inland airports doing just visual flights up and down the coast. It's a scenic area. The congestion in this area by small aircraft and KC-135s can be a real mess. And I think maybe another look at the termination of radar services should be considered. Thank you.

Col Howell: Mr Stillman, did you wish to have a copy of the final EIS?

William Stillman: Has Mr Hardy checked yet?

Col Howell: Yes.

William Stillman: One's sufficient. Thank you.

Col Howell: Alright, thank you. Save the money, appreciate it. Mr Doug Bogen, please.

Doug Bogen: Hi, my name is Doug Bogen. I live in 172 Airport Road, in Kittery. I'm here as a member of the Great Bay Regional Green Assembly, it's a community organization in this area, and I'm also the project coordinator for Clearwater for Seven Generations, which is a community water quality project. I have a number of different questions. I think I'll start out with a fairly simple one about the Environmental Impact Statements to come, you mentioned. I'm still a little bit confused about, you said now three different statements, the one that you've identified is the reuse statement. Is that also the disposal of the land?

Maj Whitlow: That's disposable land and what it will be used for, whether it's all farm land, whether it's all nature, whether it's an airport, whether it's an industrial park; as I say, in order to do an environmental assessment, you have to know what action you're taking, what's being taken. And that's why that's the last document that's gonna start out to shoot. And basically we're gonna start that in the spring.

William Stillman: I would presume that would include the final clean-up, or what they plan to do about waste sites. I think that was mentioned in the current EIS.

Maj Whitlow: OK. Let's talk a little bit about the waste sites. Again, to add some more mix to documents. If you're referring to the Installation Restoration Program, which is the clean-up of past spills, landfills, on the base, that is under a separate program. Wanda Schroeder can speak to that. Peace was put on the NPL Listing. There will be negotiations between EPA, and... I'll turn it over right now.

Wanda Schroeder: OK. Regarding the past practices or past disposal of hazardous waste on the base, federal law is very clear that regardless of whether we were closing the base or staying here for eternity, we are responsible for cleaning up any of our past practices. That's a separate program called the Installation Restoration Program. We're currently working with EPA in the state of New Hampshire on negotiating a document called an Inter-Agency Agreement, which will specify exactly how we have to clean up the base and what steps we go through and make sure that it's clean before we transfer property.

William Stillman: Now, I understand that's somewhat separate from the EIS process?...

Wanda Schroeder: Right.

William Stillman: ...Though it is the same basic process as superfund clean-up.

Wanda Schroeder: Basically, it's superfund for federal facilities.

William Stillman: So, there will be a feasibility study and hearings and so forth on that. Right?

Mr Harek: Again, it's kind of ironic, because we put a lot of information, but not really a lot compared to other volumes of information you get from the IRP. But, it's kind of ironic we put that in there, because again, as it's stated, it's not affected by the closure. That we're looking at environmental actions that are affected by closing down Pease. This process is going to continue on. There's you know, zero...We could have put one sentence IRP--zero. But, because it was brought up in scoping, we became, you know, we sort of tried to define where we're at and summarize. You may say we shot ourselves in the foot, we should have closed it off and say, hey this is not appropriate in there. We tried to do people...

William Stillman: We in any case, you did give the opportunity to refer to them. The information is included. My next question leads into that, is why did you describe the five expedite or remedial action sites...I believe that's the title, and not describe the other 15 that are currently of concern? You know, if you're talking about a summary, why didn't you just list all of them. Because I still haven't seen any record. There were I think seven sites that were identified out to the IRP Phase I. The report came out, and I haven't seen that in public yet.

Wanda Schroeder: The five interim actions that are described, are the only actions where we have identified what we're gonna do at a given sight. If we have the other information available, we could've described it. It's not available right now.

Maj Whitlow: Again, let me interject. That's the other problem with it. This document sometimes, you know, talks about a specific period of time. The IRP is going on. If we put a date in there, let's say there's five sites, a month from now there's or there's four, something like that, it becomes hard to continue to change this document. It's gonna be modified the best information available at the time to begin. That's not so much to worry, because it is being handled in another program, and will continue on.

William Stillman: OK. I did have one question. I think it's an

IRP question. But in the stage one report, I believe it mentioned the loaded fuel tank sludge disposal site as being a site for immediate expedited removal. And this was almost three years ago that in the Weston Report that was mentioned. And I notice that isn't listed in these five sites that are being dealt with. Has that been cleaned up, or what's the status of that? Does anyone know?

Arthur Ditto: In the follow-on work, which the documents haven't been published yet, they did do some excavation to see what they could find for drums. And I believe they found maybe three drums, so they kind of fell off as not being a problem, based on further investigation.

William Stillman: I was just curious about that. Does that mean that the drums were removed, or...

Arthur Ditto: Yeah.

William Stillman: I guess my main concern about all of that is, that whole process, and the reason some things are described, and others aren't, is if they're being mentioned, why aren't there descriptions of the impacts of that work in the EIS, or will it be in the future one? I would presume it would be an ongoing impact. It is related to the closure in the sense that it will be going on during the closure process.

Art Ditto: I think Kevin said it, and I'll try to say it again, that whether Pease was gonna close or not, this IRP process was gonna happen; at the same pace, when you interrelate the NPL Listing or whatever effect that has in the process, is gonna continue on, basically unaffected by the closure action. That's that's what Kevin is trying to say. So it's really, if you look at it from an impact point of view, there is no impact on the process. So we say, back to your question, why did you say anything at all. It was a comment so we thought it deserved some sort of mentioning, and it gets back into it as a dynamic process, so you can't update this thing instantaneously. So, again, maybe we shouldn't have said anything, maybe we didn't, but that's what we stated but the process will continue unimpeded by whether or not.

William Stillman: Well, I would think it would certainly impact on the reuse plans, and I would think in the upcoming EIS that should be addressed. I mean, if you're gonna be having trucks hauling out tons of contaminated soil at the same time people are talking about people are talking about moving in, building new structures and all kinds of new facilities, I would think there would be an impact there. Somewhere that ought to be addressed.

get rid of the bunkers. Other previous bases, DOD, that were disposed of. Those bunkers were used for storage or who knows what. Maybe it would make a good wine cellar, but I don't know.

Col Howell: Nice memorial.

William Stillman: OK. This is again, sort of related to the last question, I know that as either military or Air Force personnel, you can neither confirm, nor deny the presence of nuclear weapons on a nuclear site. But those of us here that are not so constrained, we know that there are substantial numbers of nuclear weapons stored there. It's addressed in the media and there have been reports, and just the fact that it's a strategic mission that the Air Force is on, it's presumably what's involved. So I know you can't comment directly on the presence of them, but I'm wondering, the draft environmental impact statement only refers to six sources of radiation, which are some kind of testing devices, and so forth. I'm wondering is it possible that these unmentionable sources have caused any radioactive contamination, such as like these bunkers, where they're stored presumably. I know that nuclear weapons have been known to leak tridium over time, and there may be consequences there. I don't know whether underneath whether you're allowed or want to comment on nuclear weapons, but we're concerned about it as an impact on the environment.

Col Howell: I think that falls in the category that I announced earlier, and that is your question will be part of the record. And I'm sure there will be somebody reviewing that for national security implications. And I think that's the best way to leave it. Cause we're not really in a position to comment on that.

William Stillman: Well, could I ask at least if there has been a study of, like has anyone gone around with a geiger counter to check the sites? I mean...

Col Howell: Once again, that's the same thing. I don't think we can really answer that.

William Stillman: In any case, for the record, I request that that be investigated further, even if you can't comment on it.

Col Howell: And that's a valid request, and I'm sure someone will look at that, but what can I say?

William Stillman: I understand your constraints. I guess I'd like

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Maj Whitlow: Again, I would say, not second guess, yes, it will. You know, there will be areas of the base because of the IRP potentially could drag out a number of years. Certain areas of the land will not be able to be developed immediately. There will be have to access for contractors to work on the property. Those will have to be accommodated. But, again, as I say, it's not a process that those deal there, and they Bechtel, that's looking at it can ignore that those deal there, and just ignore that it never existed. It will be seen it that reuse document in net can not put and office building on top of the landfill and just ignore terms. But again, that program is operated separately and will be handled accordingly. There is no change one way or the other because Phase closed. The Air Force is still responsible for those sites.

William Stillman: A somewhat related question again. Will installations waste dumps within the natural resource protection areas that proposed now, are they planned to be cleaned up? I would think specifically, like the munitions depot, I assume that's fairly large structures with concrete bunkers and, I haven't been there myself, but I could guess that's what it looks like. Will all of that be dismantled and hauled out when the base closes, or do you expect that to be some kind of historical park or...

Maj Whitlow: Let me just take one little portion of it. I don't believe that there is not anything that in closure that says we're gonna demolish those buildings, now from IRP standpoint...

Wanda Schroeder: Any site where we have disposed of anything in violation of a federal environmental law or a state environmental law will be cleaned up before we transfer property.

William Stillman: Before you transfer the property? I'm just... we're talking about a 23 acre landfill site, and it's hard to imagine that's gonna be cleaned up in a year or two or even five.

Maj Whitlow: The bunker area or the weapon storage area or whatever you wanna call it, as your referring to hasn't been identified as being a problem. So, therefore, we don't at this time, see anything to clean up. The question is of demolishing the bunkers, I'm not prepared, and I don't think anyone else here is prepared to address whether that will be done or not. As part of the closure action, again when assessing what closure actions are gonna be taken, there's no plans as part of the closure action to demolish those bunkers. Now, as of a reuse, they may be demolished. But right now, we can't speculate. Again, we don't know, what the...back to my acronym, the DAPA, Description of Proposed Action and Alternatives, that may be something. To make a park out there, maybe they'll have to

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to make some general comments. That was pretty much my question. I'll try to keep them fairly brief. I know I've been up here quite a while. But, generally I'm concerned about the timing of this whole process, in the 18P you talk about doing a risk assessment within three years. The redevelopment schedules, they wanted to go in and start redeveloping them and they get the land transferred and the cleanup of all these sites would certainly take years. It's not gonna happen tomorrow, I can imagine. You know, I just kind of wonder how all that got set up the way it is. It's seems pretty backward in terms of any kind of logical process. I know these things aren't all planned from the start. But it seems real confusing just looking at it how it got turned around so that the risk assessment is being done after development plans are designed. I would think people moving into the eight would want to know whether their health is threatened, either as workers, or residents, or people working at the site. So I think that needs to be addressed more publicly. As far as the housing on the base, I know there's a big question as to whether it'll be dismantled, or moved to another site or left as is. And I know that you're not required to move any asbestos that is stable, that doesn't seem to be causing problems, but I would think that just morally, you guys brought the stuff there. It seems you ought to be removing if it's not going to be used. You know, it shouldn't be the city or some developer's responsibility to clean up all that if they do tear down houses or move them. In any case...

Col Howell: I think some of that may come up in the reuse EIS. Is that a fair comment? What's going to happen to the houses and what happens as far as asbestos, and so on? That's something to be addressed in the future I think.

William Stillwell: Yeah. And likewise with lead paint, I think that's even more of a concern of being an obvious hazard we've known for many years, and it seems that the Air Force needs to address that more clearly. Ground water contamination, there's been a lot said about the problems there. It seems unlikely that there will be no effects. They're saying in the EIS, if we stop taking water out of the aquifer on the base that there will be no effect on the movement of ground water and possible contamination of other wells. I really question that, I don't know how that was decided. I mean I've heard statements in the past saying, well the ground water doesn't really go anywhere anyway. That was paraphrasing a quote from an Air Force official. And now you're saying, well, there won't be any impact. I'd like to hear more about that. I don't know much about the mathematical models that were used, but it seems an open question, seeing as, I haven't seen any kind of maps showing where the contamination is. Any kind of diagram of the plumes. There are a lot of great diagrams in the EIS about the noise levels in way, the runway so forth, but where are the charts showing where the contamination exists, and how fast it's traveling, and so forth? It seems like conclusions have been drawn before all the evidence is in, in that case. And given the Air

Force's prior record and the military's record on these kinds of issues, I really question how that statement came about. I think I'll stop there. Thanks for your time.

Col Howell: Could we have Mr Harold A. Berens, please. Mr Berens.

Harold Berens: Good evening, sir. I'm Harold A. Berens and I'm a resident, and I reside at the Pease Air Force Base mobile home. And I'm also an officer in the United States Air Force. I'd like to address, of course, the issue of the Pease mobile home park. I'd like to address in several stages. First, with the impact on the military person. As an officer, I am concerned with my people, and the morale of my people. I am concerned about the morale of the people who live in the mobile home park. Several of those individuals work for me directly. The morale of the individuals, the morale of the military member, must be taken into account by not only the leaders at Pease Air Force Base, and that is being taken into account, but also the leaders of the people, leaders of the individuals who are making decisions as far as what will be done with the mobile homes on Pease. It needs to be taken into account as far as individuals will be getting orders here fairly shortly. MPC is scheduled to come out to Pease sometime in the very near future; I figured the March timeframe. And that time may vary by several weeks. But the morale is a key issue, and that needs to be taken into account by everyone involved. Finances, as we know, enlisted people do not get paid very much money. Most of the people who live in the mobile home park are junior enlisted people, junior NCOs, and junior NCOs up on the average make about 1,000 bucks a month, if you're lucky. So, finances are a major concern of the individuals who live at the park. The dilemma of the individuals living in the park? There is no market, we're in a stalemate situation, we have, right now at this point in time, we have very few options we can look at on our own the area, as far as we can see, cannot absorb 50 mobile homes in the local area. Furthermore, with PCS orders coming down, individuals may receive orders overseas. And to move mobile homes overseas, you just can't do that. And furthermore, the trailers to be shipped across the states, due to the age of the trailers, they may not stand up structurally. These things do need to be taken a look at. The scope of the problem it affects 50 mobile homeowners. I know several families leave in the order of a, approximately 10 families have already received PCS orders and have already departed the area. Several of which are located at Upper Heyford and Lakenheath in over in England. Some of the solutions, though, as part of identifying the problem is that there needs to be some sort of a solution process as well. The solution process, and part of my concern is, I know that there is gonna be a solution some time down the road. There's always got to be a solution down the road. But the time factor that's involved with that solution process. A lot of people cannot absorb a mortgage payment over the next two to three to four years to determine what's going to happen with their lifetime investment, so to speak. And this involves just about everybody in the mobile home park...including myself. Although I am probably more prepared to absorb that kind of a mortgage because of my

salary than others. Some of the solutions that I've just thought of, the housing assistance program, we know that in accordance with what the regulation states, mobile homes do not fall underneath the housing assistance program. However, rules can be made and rules can be changed, and regulations can be changed. And with the help of congressional action, the housing assistance program can be changed. I know that there are congressional aides here, and I'd like them to understand that their input is important to their own, to their people of the State of New Hampshire, to the people in the country, in the United States. What happens to these 30 families--it's a small, small problem. When you look at the problem overall, it's a small issue. You're talking about 50 families, as opposed to what potentially could be a billion dollars success for possibly the development of Pease Air Force Base when it closes. By taking a look at each individual's family lives, is what's important as well. The family aspect needs to be taken into account. And I urge Congress to take an action, to take action with passing bill or passing an amendment to the existing laws that would help the individuals living in mobile home parks. Whether it be Pease Air Force Base, or an other base that may close in the future, because of budget cuts, because of the new peace movements that are going on in the world. These things need to be taken into account. Furthermore, what also needs to be taken into account is that this was brought up before by Mr. Jones...Sgt. Jones is that the trailers during the 1960's when the law was enacted, the trailers at that time, we nothing more than mobile shacks. Nowadays they're a little bit more substantial than what they were in the past. And they are homes. They're our homes, and we feel that, that we should be given the same consideration as an actual home on its own property. Our second solution, involves Air Staff action to allow a portion of the base closure monies to go to the mobile homeowners in the form of an aid. This may take a congressional commission. I know we just can't take money and to give it to people, that's illegal, that's improper use of funds. That's fraud, waste, and abuse. And I'm not a proponent of fraud, waste, and abuse. I'm not by any means. However, giving a form of aid, Air Force Aid, Air Force Assistance Fund, however you might want to allocate the monies. However you might want to authorize those monies, direct those monies, whatever that might be. If we can set aside an aid fund. And maybe not even only for the mobile homeowners, but but for the homeowners overall. There are a lot of people who own homes, a lot of military members who own homes in the local area within a 20-mile radius. And the way the economy is going, and the area, and the way it looks for the Naval Shipyard and the new contract with the submarines, with the Sea Devil, it doesn't look too promising in the future, as far as a turnover in the market. So, this again, we'll need the push and the action of Congress in order for things to take place. And through Air Staff talking to Congress, and through people talking to Congress, through letters and I highly encourage that the mobile homeowners, and homeowners in general, if you're affected by the Pease closure, to write to your Congressman. I highly encourage that. Furthermore, as a third solution, Newington or Portsmouth assume control of the park, whether it be by sale through the Government Accounting Office, or whatever organization is delegated that task of selling portions of the base. That task may be delegated to the Air Force; and we don't know that at

this point and time. I don't think we know that. And if we do know that, I'd like to know that answer. But,...

Col Howell: You want to go to the deal about that as a question now?

Harold Barons: Sure.

Col Howell: Can you answer that?

Kevin Matek: Could you repeat the question?

Col Howell: Who gonna take care of selling the property and how is it going to be disposed of?

Harold Barons: Or are different sections or different sectors of the base going to be divided up and sold by different agencies? Or is it just the GAO that will be selling the properties?

Col Howell: You're thinking of GSA, aren't you?

Harold Barons: Oh, excuse me, GSA, I'm sorry.

Kevin Matek: Again, what the Air Force is doing right now, is working up a preliminary disposal plan for the property, and best the package is. And again, there's gonna be inputs from the local community. A number of them, even at yesterday's meeting said they were in favor of a mobile home park, and even expanding. Again, you know that doesn't necessarily resolve the problem, because there was still the timing with it. Because we are, it is a ways off between doing this. It would be nice for all. I'm sure the community and everybody else would say, well, it would be nice to jump those two years, and know exactly what's gonna happen. It's like any other decision, there are different steps that have to go through to come up with the development in plans...to do that. But how exactly, whether it's gonna be all lump sum, whether it's gonna be divided up sum different, it's the Air Force's decision as the selling body, the owner of the real estate. They are also gonna hire GSA to help with the transfer to, but they do have to follow GSA regulations in disposing of the property. So we've been working with GSA to get them on board to help us assist in packaging, but no, there hasn't been any hard decisions of how it's gonna be done. And that's what's gonna be developed in this reuse EIS as part of the planning process. I wish I

could give you an answer, say yesh, it's gonna be a mobile home park; see this person to sign up for a lot. You know, and that's obviously what would resolve the problem.

Harold Berens: And I understand the length and time required for a decision to be made, I understand the paperwork that is involved with a decision like this, I understand the implication down the road, in the future. However, a decision does need to be made in the most expeditious manner possible. And, however that might be, whether it be to cut out paperwork levels, which would save money, by the way, and that may be an option. And we as managers, we have that obligation to sit back and take a look at how we manage our programs, and how we might effectively revamp the government or for whatever branch of service we're working for. Furthermore, Newton or Portsmouth assuming of the park, let's just put that as a statement. I understand that there's a requirement for towns or townships, or cities, to have a certain section of their city set aside for low income housing area. The mobile home park situation may land itself in that area for the city of Newton to meet that criteria as a low income housing area. Well, that is a third solution that might come into play, or that might be taken into account. A fourth is the, perhaps is a, the fourth solution or an approving authority or whoever it may be, allow the sale of the park to the owners of the park through individual sale of lots, or even as the park itself...

Col Howell: Is that the same proposal that Mr Jones addressed, is not that indeed the title to it?

Harold Berens: Right. And I believe it is the same thing as... That might also lend itself to a rapid solution, as well. A bottom line, you know I don't want to belabor the point too much longer. The bottom line, you know, I'm concerned, you know, not only for myself. I'm concerned for other folks as well. I have a concern for them. I say many of the people work for me. And I run into situations everyday on a daily basis, managerial situations that I'm faced with. Making decisions as far as safety goes or as far as aircraft flying goes, whatever the case might be, and this situation lends itself to problems which may precipitate... and further problems down the road for several individuals. I can see that happening on the horizon. And we need to be conscious and aware of that. And whatever decision we make, we need to have a clear-cut, conscious decision. Knowing the effects of, of the decisions that that we're making, upon the people of the Air Force, upon the people, the taxpayers, and upon the overall, the citizens of this country. We need to be aware of those situations and of those decisions and how they impact everyone.

Col Howell: Would you like to be included in the written response?

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Harold Berens: Yes. I'd like to. That's all I have. Thank you sir.

Col Howell: Thank you. Alright, that was the last question. During the next portion of the hearing, we'll receive the oral comments of those of you who asked to speak this evening and who have filled out the comment sheet. And during the comment period, Mr Marek and Major Whitlow, and their team, will only offer comments if clarification appears to be necessary and avoid any misconceptions. And then following this group of comments, then we'll again open the floor to questions and comments, if sufficient time permits. And I've got three people who would like to make comments. Mrs Hardy, would you like to make a comment, please?... Good evening, it's nice to see you again.

Jean Hardy: Thank you for allowing me to speak again. Jean Hardy. Littlebrook Air Park, Elliot, Maine. I'm concerned about the radar facility closing. Concerned about the air space and the safety of the air space in the southern Maine, Seacoast New Hampshire area. I used to think mid-air collisions happened to other people. I used to think they used to happen out in California, Florida, other parts of the country. But in 1979, a very good friend of mine was killed in a mid-air collision with a Guard in her VOR. And that opened up my eyes a lot. Unfortunately, my friend did not use radar services, and I sometimes wonder, if he was using radar advisories, if he'd still be alive today. There's a lot of traffic that flies through the Seacoast area. In 1987, there were approximately 106,000 operations that the radar facility at Pease logged. Of this, there are 70,000 civilian operations. There is no doubt in my mind if the Air Force follows the irresponsible decision to remove the radar from Pease Air Force Base, there will be a mid-air collision in the Seacoast area. Thank you.

Col Howell: Mr David M. Holden. Is that correct, Mr Holden?

David Holden: Thank you. My name is David M. Holden. I'm Chief Planner for the City of Portsmouth, employed in the Planning Department, and live in Portsmouth. Along with others, the planning department is still in the process of reviewing the draft Environmental Impact Statement. While this review is still ongoing, it has been sufficient to generate serious concerns. A more complete analysis of this draft is forthcoming, and will be submitted within the comment period to Dr Hugh Stirts. In this review the planning department has reached the conclusion that this draft is inadequate. It does not complete, at least satisfy necessary statutory and procedural requirements...

TSgt Scheetz: Colonel, could you slow him down, please.

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Col Howell: Could you slow down a little bit? We're having trouble.

David Holden: Certainly. Specifically, the draft inadequately addresses issues that relate in one manner or other to the following: National Environmental Policy Act, Executive Order 12372, Superfund Amendments and Reauthorization Act, Clean Water Act, and the Safe Water Drinking Act. Some specific concerns are as follows: One, the EIS should, as part of its review, be conducting analysis and evaluation of the interagency agreement, which is only now being coordinated with the Redevelopment Commission, the state, the U.S. Environmental Protection Agency, and the United States Air Force. This coordination, which has been lacking, and arguably is behind schedule, properly should have been evaluated by this EIS pursuant to the Environmental Policy Act in Executive Orders. Inter-governmental coordination should be in place. Instead of this stage of the closure, pieces are still being arranged. Two, in reference to the bulk fuel storage area, page 3-3 of the draft, the condition of Tank 3 is suspect to the extent that it is recommended for demolition. However, the EIS allows for this tank to remain, if it is braced. If it should be demolished, then the EIS should so require. The alternative action being allowed does not address the final disposition of this five million gallon storage tank. It should not be an acceptable resolution to the existing condition of the tank. Three, the Superfund Amendments and Reauthorization Act evidently established a three phase study of waste sites. Phase I, Preliminary Assessment Site Inspection; Phase II, Remedial Investigation Feasibility Study; Phase III, Remedial Design/Remedial Action. Phase I identified 18 hazardous waste site, of which 16 went on to Phase II activities. Phase II investigated the 16 sites, plus four additional sites. Of these twenty, 13 were recommended for remedial investigation. The ongoing remedial investigation phase investigated the 13 sites, plus seven additional sites. Of these twenty sites, data on 15 of them is not yet available, the remaining five have been recommended for expedited remedial action. This EIS, however, does not state: A., How the sites were originally identified, B., How particular sites were eliminated, C., The process by which other sites were added, nor D., does it address the 15 missing sites. What conclusions can be drawn on this EIS, when complete data on 15 sites is not yet available? Four, in regards to one of the identified sites, the following comments are made: In regards to the fire training area. Quote. Indications are that the bedrock may be a significant found water flow unit. Arsenic, iron, manganese, trichloroethylene, etc., have been found in the ground water at concentrations exceeding EPA maximum contamination levels. Contaminant plumes have been detected, but because of downgraded leveling points are limited, the extent of the plumes have not been determined. Unquote. If the EIS goes on to state that the Air Force's, quote, in turn removal measures are not considered as activities of closures, rather their continued activities of the Air Force's installation restoration program, is inconceivable with in turn removal measures, which quote, may meet the long term clean-up goals for a site if a no further action decision can be support, or at the same time, not

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being considered as activities of closure. The EIS should address the range of activities as mandated by federal state statutes. If it does not, what confidence should we have concerning the clean up of either these five sites or the other 15 sites where data is not available to them? Five, risk assessment on these five hazardous sites is proposed as a way of identifying whether, quote, whether actual or potential harm to public health or welfare in the environment is posed. The EIS then goes on to state that risk assessment is based on, A., contamination assessment, B., environmental fate and transportation assessment, C., exposure assessment, D., toxicity assessment, E., risk characterization. No where does the EIS delineate what the standards, procedures, or methodology will be for determining what the risk assessment is for these five sites. What are the assumptions? Who is preparing them? It also states that these actions will be done within three years. This timeframe is a serious consideration both now, and in the future reuse plan. Moreover, the EIS does not state that the timeframe will be for the additional 15 sites, which are not even mentioned at this stage. (...it's not me.) Sixth, general comments. Throughout the EIS levels of contamination should be given in relation to allowable state and federal standards. Without this information, the values listed in the EIS are less than meaningful to the layperson. Seven, several studies were done to identify existing conditions on the base. Some of the studies are adequately identified, and some are not. For instance, the source of data is not always listed. There should be more consistency in data sources. Page 3-3, paragraph 3, states that all underground storage tanks are planned for completion prior to disposal of the installation. However, we are subject of funds and to the State of New Hampshire approval. What happens if funds are not available? Will environmental quality be compromised? Nine. The impact of the closure of Pease Air Force Base on lead paint in housing of Pease was inadequately addressed in the EIS. In Section 3.4.5 it is stated that the majority of the housing contains lead base paint. The Air Force in 1981 acknowledged the danger of lead base paint by their distribution of health awareness letters regarding the prevention of ingestion of paint chips by children. In addition a policy of promptly repairing chipped surfaces was implemented. In spite of this acknowledgement, in Section 4.3, it is stated that leaving these buildings vacant will not have an impact. However, the immediate impact will be felt by any members of the public who become tenants of these units, as they will receive no warning of the presence and danger of lead base paint. In addition, if it determined that a person has an elevated level of lead in their bloodstream, as a result of living in these units. The city has had a policy that the lower 4 feet of lead in that unit be removed. This raises a question--who would be liable for the cost of the removal of the paint? Another immediate impact. That concludes my general statements. Thank you for this opportunity.

Col Howell: Alright. Thank you, sir. I notice you've been reading from a prepared statement. Would you like to attach that to the record?

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David Holden: This record will be forwarded to you as part of the proceedings of this EIS.

Col Howell: Alright, fine. Thank you. Mr Craig Wheeler, please. Good evening, sir.

Craig Wheeler: Thank you, Colonel. My name is Craig Wheeler. I am the planning director for the City of Portsmouth. I'm also a resident of Portsmouth. I can only reiterate several of the points that my colleague, Mr Holden, stated. One of which is, we will be submitting both to this committee and to the redevelopment committee, copies of our written recommendations relative to the EIS. We will also be forwarding on to land use boards with the City of Portsmouth and also to the city council. I would like to bring to your attention, ladies and gentlemen, three major points that I think are useful in your deliberation over the EIS issue. One is, let's take a step back and look at a little bit of history. Over one year ago, one year ago and what, three weeks? ...The City of Portsmouth found out something was going to happen, and the comment on the street and as a resident of Portsmouth we always said the base will never close, the base will never close; as you indicated on December 29th, over a year ago, it was announced the base was going to close. And I've given a lot of thought to that, because immediately my department was thrust into some major, major analytical work. Which has resulted in not only a master plan from the point of view of the City of Portsmouth, but also a zoning ordinance for the land that is presently in the boundaries of Portsmouth. I have given copies of both that master plan and the land use and zoning information to this committee earlier today. It's a rather extensive document. Councilman Wagner made reference to that document this morning. And I would urge you to carefully look at that. Carefully understand some of the models, particularly the socioeconomic models which we addressed so vigorously in that document. I think that very carefully outlines some of the concerns of the City of Portsmouth. Let's go back to a history lesson. Because the city has been grieving for one year. We're losing something. Something that has been part of this city for as long as I've been here. And I grew up here, went to school here. Went to school with all of the kids from the base. And they've been a part now that's going. I think that the city is over the grieving process now, we're over. We know it's dead. Let's bury it. What's going to happen now? The base will be redeveloped, Portsmouth will grow, it will continue to grow. The Seacoast will continue to grow. And I see this as a very upbeat. I want to try to change some of the tenure. I hear we're doomed, we're dead, we're buried. We're not. We're gonna grow. The base will be developed. But we need your help. Every one of you up there have a very important role to play in the redevelopment of Pease. You might not like to hear us say that, but you do. The EIS from where you're doing right now, is an integral component to the redevelopment of Pease. But, you're missing the boat. I have to tell you this. You're missing the boat, because you're not addressing, in this primary EIS, socioeconomic impacts. Ladies and gentlemen, the City of Portsmouth needs that data now. We need to plan

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for our future. Not six months down the line, not nine months, we need it now. We need to understand for not only our land use purposes, but for our expenditure purposes, for our tax rate purposes, all those areas of socioeconomic issues that are not addressed in your primary EIS. I find a major fault that is not there. I have to totally agree with Councilman Wagner, who was very, I think very eloquent on that issue earlier. The analysis, it is lacking, the relative socioeconomic section of this is missing; it is an important element for us, and us now. We can not wait, we need it, the city needs it, the base needs it, the community needs it. Where are we going? What's going to happen? The future is before us. We need that information. My department needs that information, the planning board, who I serve, needs that information, the city council needs that information. We cannot be without. Thank you.

Col Howell: Thank you, sir. That's the last person who has signed up to make an oral comment or a question. I have... (...I don't think it's me either. Thank you.) I have a sheet from Candace Richards, from Jamie Py, P-Y, I believe? ...And Barry Goldstein. Do either of those, any of those three people, would they like to add anything, or would you just like to add your request for the final EIS? In there any... (Pause) OK. Thank you. Is there anyone else, who has not given us a comment sheet, who would like to be recognized to ask a question? ...Yes, sir?

George Jones: Colonel, I would. And I apologize for not having a sheet for you. My name is George Jones, and I am the chairman of the Pease Redevelopment Commission. I didn't intend to speak today, tonight, but, I did hear a remark earlier that concerned me. And I would address it to Mr Marek, I believe. When Mr Wagner talked about the closure EIS, I think I heard you say that would start in the spring.

Mr Marek: That is my understanding, yes.

George Jones: Well, I'd like to call your attention to a remark you made yesterday morning at a briefing when you told us that you wouldn't start the reuse EIS until you had received the plan from Bechtel, which would then be a year from that day. Is that true?

Mr Marek: I will go on record as correcting that, yes. I talked to some people up at Headquarters Air Force. They indicated that they wanted to start that with the preliminary disposal plan. It would be not finalize the DAPA of the description of action, because it would be an ongoing one to look at what Bechtel...but they would have enough information in the Air Force plan to start the process on the EIS. So I will make that correction.

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George Jones: Well, OK. I accept the correction. Now let me ask you the question again. When will the reuse EIS be completed?

Mr Marek: Again, I could not project the exact date of it. Generally, an EIS, as you can see just by doing this EIS for the closure, can be a long process. Again, it could be nine months to a year before it's completed. I can't conjecture. If many times the hardest thing to nail down is the description of the proposed action and alternatives, if that starts jumping around a lot, it could drag out the process. As far as making the decision of the final what's going to be done so an assessment can be made. Again, it depends on the environmental issues that come up that need to be addressed. Just like what this meeting is here, there's comments being made. The Corps of Engineers went out and started with the scoping to try and get the issues. Sometimes issues come up at this meeting right now that may take additional research. We have projected a date for the completion of this document. New revelations came up. I don't want you to pin me down in the time again. You caught me once, you caught me already.

George Jones: I can see you don't want me to pin you down, and I can appreciate that. But, let me ask you a question then, let me make it a little more general. Is it fair to say that we will have the closure EIS long after the base is closed and the majority of the people have left the area, and the City of Portsmouth is saddled with taking care of the facility. Is that fair to say?

Mr Marek: I think there's a few loaded things in there. I can, I guess I'd have to divide your question out. The projection for the complete closure of Pease is for March '91, as expressed by Major Whitlow. Is that the correct date?

George Jones: It is fair to say we will not have the EIS by that time, I would guess, the closure EIS.

Mr Marek: Given the timeframes that I've given if you started in...the reuse EIS

George Jones: The reuse?

Mr Marek: The reuse. The reuse EIS. That's the word here. Potentially it may not because people would be leaving before that date.

George Jones: So, it's fair to say we will not have it in time to

do any major planning before the economic impact hits the city and the State of New Hampshire. Is that true? (Pause) I would like to make one more comment. It was not bad enough that the EIS was probably 90 days late, getting to us, but one date that has never changed has been the date that the base will leave. From the date that you said this base was gonna close in December of last year, we've gone from a five-year closure to an 18-month closure. And then the Air Force and the DOD continue to let their dates slip. And we're trying on the commission very, very diligently to make sure we don't let out men slip, because we feel we have an obligation to the State of New Hampshire and to the Seacoast to make sure that it doesn't slip. And I have to tell you that it's not making our job any easier. We heard that we are the first; you went us to be a model. Believe me, we want to be a model. And as Mr Wheeler so elegantly said, the city has been planning for this. They've accepted the fact that it's gonna be just devastating to most of the people in this area to lose a facility like Pease, we hate to see it go. We need your support. We need your help. And we need to have you help us with through this closing process to make sure that you do allow us to be a model. We're trying as hard as we can to be with on our end, and as you're doing your planning, please don't let your end slip any more. We need to have you hit your target dates and be helpful to us, so we can hit ours. The reuse issue is extremely important to the State of New Hampshire and the Seacoast. Thank you.

Col Howell: Thank you, sir. I saw another hand over here. ...Yes ma'am? ...In the front row... Did you wish to speak?

Clotilde Straus: Thank you, colonel. My name is Clotilde Straus. I had given my name earlier, but I was late in arriving today, so maybe you called my name earlier. I live in Portsmouth. I'm a member of the Natural Resources Protection Advisory Committee of the Commission. My principal area of involvement is the study of the flora. Particularly the local flora. Because of that, and my position in the advisory committee, I have occasion to walk the base on two official field trips. During those field trips, I had occasion to come upon some plant species which are considered rare or endangered, and I've had occasion to communicate these facts to the committee and to the other persons involved in presently studying the flora of the base. But, I would like to say, in response to the EIS. I'm very impressed with the condition the Air Force has maintained, has kept and maintained the undeveloped areas of the base. This transpires in this document, and is certainly very evident when you walk the undeveloped areas of the base. And I would like to communicate to you my admiration on that subject. For instance, many of the fragile swamps and upland woodlands have been left completely to their own devices for the wildlife to use, and for the advanced species to flourish. I haven't seen any evidence of unregulated vehicular traffic in these wide areas. And you have a sense that the Air Force is really taking pride in the condition that the wildlife habitat is left in. So, when the time comes for the other EIS, for the reuse of the base, I came tonight to speak and be on record as urging the Air Force to consider the

move, which has been recommended by the committee, and I sit on, a move which consists in letting the U.S. Fish and Wildlife Service take charge of these areas, which are really very, very unique ecosystems because of their vicinity to Great Bay. As perhaps some people do not realize that we are here, a very important region, where particularly some plant species are at the northern limit of their range. And when you pass from the Great Bay to the other side of the Placataquus River and you are in Maine, some of the species we have here, are just not found on the other side of the river. So it's very important, as I see it, and with some rather long experience with the local flora. I consider this area absolutely unique. There are rare and endangered species. And I'm sure we will find some more. The team from the state Heritage Program who is presently studying the area, will undoubtedly come up with more discoveries there that are very important. The Great Bay ecosystem should remain intact. And this is our one and only chance to keep that very large segment all in one piece. And I would like to see that philosophy remain in the reuse plan so that there will not be efforts made to fragment that system. What we have here is a very important web of living organisms... on that flora which are dependent on this bay. The strip of land along the bay is just as important as the shoreline, itself. So the upland must be considered as part of the preservation of the bay. And as a matter of fact, when the question comes up as to whether we as a society can afford to lose that land and ignore the economic factors, I admit that the economy of the bay is very important and very dependent on the ecological unit there. Not just what you fish from your boat, but everything that is tied with this bay life, the grasses in the salt marsh, the trees in the edge of the salt marsh. All this is tied together, and should be preserved as one big unit. So I would like to very strongly urge that the plan includes that management, eventually by the U.S. Fish and Wildlife Service for Wildlife Habitat, of great regional importance. Thank you.

Col Howell: Thank you very much.

Kevin Harek: I'd like to make a little plug, I guess.

Col Howell: Alright.

Kevin Harek: About Nobel. We are having a survey done on the base. Another little plug just complimenting the Air Force. The Air Force is a steward of the land, it does have many management type programs to supervise. There is somebody in the audience, Dave Nyland, community planner, that works with some of those, I believe. Mr Art Ditto, also. We'll let Mr Nobel just talk a little bit about the surveys there. They're more getting in the line of getting prepared for the reuse to be able to assess some of that.

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Robert Nobel: Very briefly, we've, with Air Force funds, contracted with the Nature Conservancy, a survey of the entire base for rare, endangered, and special concern species now known at this time to be present on the base. To date, they found two rare plant species, and Dr Straus has found a third. This inventory is ongoing and is to be completed in May. And all that information will be used in the reuse EIS within that phase.

Col Howell: Thank you. I saw another question from over here. ...Yes, I believe it was you. Yes, please.

Alan Kaler: My name is Alan Kaler. I reside in 49 Sumac Drive, Pease Air Force Base, and I spoke last night. Thank you for the opportunity again. As we left last night, a few of us were speaking. We anticipated somebody calling somebody else. Major Whitlow, in your response earlier, you said that you spoke to somebody. We would like to know who you spoke to, and what office that was, this morning.

Major Whitlow: Frankly speaking, I can't tell you the name of the individual. The office I talked to was Air Staff/ERPJM. They are responsible--the ERP office, is an installation, an Air Force installation office. They handle rebasing issues, they are handling the Pease closure issue along with the other Air Force bases that are closing. There's a sum total of 84 military installations in the Carlucci commission. This office handles the Air Force portion.

Alan Kaler: Alright. One more question, then. Now, the person that you spoke to, was he or she aware of the trailer park situation at the time you spoke to them?

Major Whitlow: Today? Yes, sir. Oh, yes. I got a long dissertation about the efforts. And a very strong feeling of frustration by these people that they had not been able to reach a good solution for the trailer park situation. Again, it goes into the uniqueness of the Pease trailer park. It's part of the problem. It's not an easy answer. They have explored several avenues, and have ended up not working out. Or, in their concerted opinion would have openly resulted in a worse solution for you than what you may appear to think it is now. They were in receipt of the first congressional inquiry. I advised them that they might anticipate 49 more in rapid succession. This was not taken as an alarming situation for them. And felt that this may be what is required, since we have so many legislative considerations involved; this may be what is required to raise it above the level that they work at to get the proper identification and solution.

Alan Kaler: OK, sir. Just one more, since you couldn't give the

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name out. If we contact this office, is there someone there that would be willing or able to speak to us personally? It's not that we disbelieve you, but all the meetings that we've gone to, we don't get any names. Regardless of who's at these meetings, no names ever come out. It's just a higher office, a higher office. We want to find out some names of some people that are working this situation. That's what our congressmen are looking for.

Major Whitlow: I will make the names of a point of contact available to the base CARE office for you.

Alan Kaler: Pardon me, sir?

Major Whitlow: To the base CARE office. I will make the names available, or I will get you the names. To the base CARE office...

Alan Kaler: And, they will be available there, then?

Major Whitlow: And you should be able to contact them.

Alan Kaler: Will that be available this week, sir?

Major Whitlow: Yes.

Alan Kaler: Thank you very much.

Col Howell: OK. Did I see a question over here? No... Yes.
(Pause) Good evening...

Peter Bresciano: Good evening, sir. Peter Bresciano from Portsmouth. Mr. Jones, just in his comments, I erred my memory, and there's a couple of questions that the people in the audience might want to clarify, some issues on the reuse EIS... and the closure EIS. And question is, the record of decision. If the record of decision is delayed past April, May, or June, will any actions or can any actions be taken by the base to close or to move organizations, equipment, aircraft out of Pease?

Col Howell: You mean April, May, June of this year?

Peter Bresciano: April, May, and June of this year.
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Col Howell: OK. And...

Peter Bresciano: And is there anything in NEPA that covers the movement of or...not the movement, but the actions, if there's no record of decision rendered?

Col Howell: And your question is, will that stop the personnel actions?

Peter Bresciano: Yes.

Col Howell: Can you answer that?

Major Whitlow: I can that generally we do not take actions prior to the record of decision. I don't have the QEC, but there is a section in there, some actions can be taken. Now, readily looking at that, that section, I don't want to try to quote...

Kevin Marek: If you would like to remain after the meeting, we could look that up...

Peter Bresciano: How about the environmental assessment. Well, give me your feelings on the environmental assessment... Do you feel that there is a finding of no significant impact coming out?

Col Howell: Is that the assessment referring to the 111 (one eleven) movement?

Peter Bresciano: Yes, the environmental assessment. Not the Environmental Impact Statement... The environmental assessment.

Mr. Marek: I'm not gonna speculate on it. It will be out shortly.

Peter Bresciano: And you don't foresee a FONSI, or you do?

Col Howell: I said I'm not going to speculate.

That's an irreversible action. If you took that before the record of decision, that building is demolished. So, it's an irreversible action. So, there is a caveat in there. And there's, then there's some other items that are in there. But that's what I'm saying. There is a section, there is some items that you can take, on personnel, equipment, or something that you could do prior to a record of decision.

Peter Bresciano: OK. Would the movement of aircraft fall in that, that you could or you could not move them? ... KC's. KC-135s.

Kevin Marek: I wouldn't want to necessarily speculate. In some cases, you have some transient aircraft here... I don't know. It's how fixed it is. You know, again, I guess you could jump all one way and say, well gee, all you have to do is fly the plane back. You know, you could define what exactly you mean by moving a KC-135. Each action like that would have to be evaluated... under those criteria, to see if it met those criteria. And he assessed, whether it met that criteria. So, you know, don't put the KC-135, flight simulator, you know, this and that. They'd have to be assessed and they'd have to be looked at under the regulation.

Peter Bresciano: Alright. Thank you.

Col Howell: Thank you. Do we have any other questions or comments? Yes, sir?

Cliff Sinnott: Good evening. My name is Cliff Sinnott. I'm the director of the Rockingham Planning Commission. The Regional...

Col Howell: I'm sorry. Could we have your name again, please?

Cliff Sinnott: Cliff Sinnott. Director of the Rockingham Planning Commission. The regional planning commission in the area. I had one question and a couple of comments. The question is one that has come up for tonight, and has to do with that infamous paragraph on page 328 regarding the rationale for not including socioeconomic impacts in this EIS. I think I kind of understand the rationale, but I wanted to ask this question to see if I could get to the bottom of it a little bit. Suppose there was no reuse planned for the property? In that case, would socioeconomic impacts of the closure have been considered and been incorporated into this EIS?

Kevin Marek: No action is an alternative. That could be the reuse. I don't know quite how to answer that, or no action would be a reuse... would be an action.

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Peter Bresciano: Now, if... Well, it doesn't matter then. Um..., is there... I don't want to stay after the meeting just for any information whether there is one or not. It should be, these people here should know whether the movements on the base are going to be instituted, even though a record is not forthcoming.

Col Howell: Where do you have to go to look it up?

Kevin Marek: I don't think any actions will be taken.

Col Howell: So, no action will be taken. Your question was, what was the specific... regulation referencing.

Peter Bresciano: No, No, No. I'm just wondering, will there be, any actions be taken if a record of decision is not forthcoming. say, before June, July, of this year?

Col Howell: And you're talking about manpower actions.

Peter Bresciano: Manpower, aircraft, equipment....

Kevin Marek: And I'm saying there is a section within QE regulations that does allow some actions before the record of decision. So that is the answer to your question. Whether a paperwork moves from the base or whether something larger moves, I'm not gonna answer that, because I'm not the one that has every item, you see. But, I'm saying within the QE regulations, there is items that you can do, actions that you can take before the record of decision. If that's what you want to hear, the people to hear, that's the answer. If they want the specific site, you're gonna have to wait until I look in up and read from it. I don't want to speculate on it. I've gone over....

Peter Bresciano: No, I don't need the specific site. It's just that I didn't know whether anything could be moved. And you clarified it. That some things can move and some things will not be able to move.

Kevin Marek: Yeah. One of the caveats in there is that it's not an irreversible action. It's one of the caveats, it says in that section. Like, one of the items that you would do that you would not be able to do, would be go in and let's say, let's take it away from this EIS. Your proposal was to build a new facility. And part of that was to demolish a... another existing office building there. They said, well, oh, just demolishing this office building is no big deal. Let's demolish it.

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Cliff Stanott: If there... No, what I mean is, if there was gonna be a reuse, and therefore, no reuse EIS. Would then you have decided to incorporate the socioeconomic impacts in more detail?

Col Howell: I think there is already been decided to be a reuse EIS, hasn't there?

Kevin Hurek: Yes. There's decided to be a reuse EIS. I mean, I guess we're... semantics. Leaving in a DAPA description of an action. Sometimes you have no action alternative. And as I said, if they decided that the action was no action, pickle Peace Air Force Base, that would be agreed. I guess I kind of complicated your question.

Cliff Stanott: Yeah. The point I was trying to make is that, that I think there are two reasons to study socioeconomic impacts. Obviously, there are going to be a whole set of socioeconomic impacts that are particular to the reuse. But, there are a whole set of socioeconomic impacts that are related to the closure of the base, itself. And I think the plea from the City of Portsmouth and others that we've heard tonight is that regardless of the reuse and the timing of the reuse, which is a critical issue, there's the need to understand more about that, what those impacts are gonna be in the short term. And regardless of whether you say because there's not a clear enough connection between those impacts and biophysical effects, I think that the need is, and perhaps you can't respond to that, but the need is to have socioeconomic effects addressed here. A couple of other comments on the EIS, itself, being a um... I'm surprised it hasn't come up tonight, but being a, trying to be a good planner, and hearing from some planners earlier, I think it would be improved substantially, especially Chapter 3, if there was more inclusion of maps. Particularly, maps of the entire site, such as a topographic map, a map of surface water, ground water, soils... I know those things exist. We even have them in my office. And I think that as far as understanding some of the potential impacts and the relationship between storage tanks and hazardous waste sites, and the ground water, and the public water supply wells that say, or the base's water supply wells... those things are important to be able to see in interrelation to each other, and to see the connections. And without the maps, it's very difficult to do that. I would implore that if you make some changes here, that, that would be an addition... those maps. And also, one other thing regarding the hazardous waste sites. There was a statement made earlier that only the five remedial sites were included, because those were the ones where you had identified the remedial action. The other 15 or so, you may not have identified remedial actions, but it would still be helpful in the context of the whole EIS, to have whatever information you have about them included. I know that's a process that's going on independently, and you say you could have gotten away with a single sentence. But then again, from the practical standpoint of making this a

useful public document, I think it was a good idea that you put what you did in. I just don't think you went far enough. And perhaps to make it easy, I understand that Weston has a considerable amount of data in connection with the remedial action and the hazardous waste sites. And I think that a portion, perhaps, of their findings could be incorporated, either by reference or directly into the report, and it would make it much more useful. Those are my comments. Thank you.

Col Howell: Thank you. Do we have anymore comments or questions? (Pause) Yes, sir?

Glen Malmad: Thank you, colonel. Glen Malmad. Peace Trailer Park, who will make a brief viewpoint. If I live in utopia for a minute please. The EIS comes back, the trailer park is up and ready to go. Do we know how to fight Congress for funds? Will that say, come back the 13th of February, yes it's approved, yes you guys need help. Could that be a viable thing that we have to look at. That yes, now Congress has to appropriate funds for us to even get paid?

Col Howell: I'm not sure any of us knows the answer to that. The EIS is certainly not a finding document by any means. It only points out environmental impacts and reaction.

Glen Malmad: Is he saying that we really do have another battle if we can sway you to our side to begin with?

Kevin Hurek: Again, I guess, loaded questions, but to an extent it can be. The environmental document is not a funding document. It tells the consequences of the action. Other things have to take place. A lot of times it gets mitigation on environmental actions, on actions to protect wetlands. Again, like taking something that's not in your case, there's wetlands that are in there and they may be damaged, there may be mitigations where the government will have to sign up to commit themselves to replace those wetlands. So it does commit, and it's required. It's certainly not a funding document. Again, I guess we could repeat what the major said about some of the actions and what's going, and I think that it's appropriate, the line that has been taken by the congressionals.

Glen Malmad: I do have one last statement. As the Colonel and the Major both know, we do have pretty well free run of the base as military members, except for any restricted areas. I think it would be really nice if some people who live on that base, know where some of the hazardous waste sites are. Wives, families, kids, go out pull over to the side of the road. Who knows what you're walking on. Maybe we could put some of that out, to the people who live there. (Pause) Thank you.

course of action on the proposal. This public hearing is adjourned at 9:35 p.m. on the 18th of January 1990.

Col Howell: OK. I'm not sure that's kind of within our purview to do, but...

Wanda Schroeder: That information is available through the base civil engineering office.

Kevin Marek: Certain areas are fenced, aren't they?

Wanda Schroeder: Some areas are fenced off with signs... Is that right?

Major Whitlow: The fire training area is limited access, I believe. Which you wouldn't be walking through that. The fuel storage area is fenced, which would prevent any movement through there, other than authorized personnel. Off the top of my head, those are the only two I can think of now. I don't think you're treading through those concerns at this time, no.

Glen Malmad: It's a little disconcerting. I won't give a building number where I work, but you see the companies out there drilling wells for test pits, but then we throw squadron shop parties there. And our selves, wives, and children sit on the ground.

Major Whitlow: Many times the sites, I don't know if we want to go into detail with the sites, a lot of the sites are under ground with the water, etc, at different places, but there's no hazard above ground.

Glen Malmad: Not to what health officials can state today.

Glen Malmad: Thank you, gentlemen.

Col Howell: Sure. Are there any other questions or comments? (Pause) OK. Please remember that you have until the 13th of February to submit your written materials to be included in the transcript of the hearing. And those written statements will be fully considered and addressed in the final EIS. Once again, the oral written statements or comments will be afforded equal weight. We appreciate your efforts to come out tonight to contribute your views to this public hearing. And thank you for your courteous attention and adherence to the rules of the hearing. Please be assured the Air Force decision-makers will carefully consider each viewpoint raised here tonight when deciding the ultimate