

A

Comments on the DEIS and Responses



New England Region
Office of the Regional Administrator

12 New England Executive Park
Burlington, MA 01803

PC001

PC001-1

A copy of the Airport Layout Plan has been included in the EIS as Appendix K.

Reference to the Airport Layout Plan (Appendix K) has been added to the text of the EIS in Sections 4.1.1.1, Aviation Land Use Planning, 4.6 Air Quality, and 4.6.4 General Conformity Analysis.

PC001-2

Text in the EIS has been updated in Section 4.6 to indicate that the Navy's analysis shows that project emissions for Alternative 1 do not exceed de minimis levels, and therefore, are presumed to conform to the State Implementation Plan (SIP), and no General Conformity determination for purposes of approving the Airport Layout Plan would be required.

The Navy determined that General Conformity requirements shall not apply to federal actions that involve the transfer of ownership, interests, and titles in land, facilities, and real and personal properties, regardless of the form or method of transfer [40 CFR 93.153(c)(2)(xiv)].

PC001-1

PC001-2

Mr. David Drozd
Department of the Navy
Director, Base Realignment and Closure Program
Management Office, Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Dear Mr. Drozd:

The FAA has reviewed the Draft Environmental Impact Statement (DEIS) for the Disposal and Reuse of the Naval Air Station at Brunswick, Maine, May 2010, and provides the following comments:

- FAA requests that a copy of the proposed Airport Layout Plan be placed in the report, even if it is in an Appendix and referenced in the description of federal actions. The federal action is the Airport Layout Plan unconditional approval. FAA needs to be sure that the Airport Layout Plan is ready for approval when we reach the ROD stage.
- The FAA requested that the DEIS state that General Conformity does apply to the Airport Layout Plan approval under Alternative 1 and that that analysis would be accomplished in the Final EIS. The DEIS states that General Conformity will be required for approval of a new public airport under Alternative 1, but does not state if or when it will be accomplished. FAA requests that the General Conformity analysis be conducted and included in the Final EIS.

Please contact Barbara Travers-Wright of my staff at 781-238-7025 if you have any questions. Thank you for the opportunity to review and comment.

Sincerely,

Amy L. Corbett
Regional Administrator

A-3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

June 28, 2010

David Drozd, Director
BRAC Program Management Office Northeast
Attn: Brunswick EIS
4911 Broad Street, Building 679
Philadelphia, PA 19112-1303

Re: Draft Environmental Impact Statement for the Disposal and Reuse of Naval Air Station Brunswick, Maine (CEQ#20100162)

Dear Mr. Drozd:

The Environmental Protection Agency-New England Region (EPA) has reviewed the Department of the Navy's Draft Environmental Impact Statement (DEIS) for the disposal and reuse of Naval Air Station (NAS) Brunswick in Brunswick, Maine. We submit the following comments on the DEIS in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS describes potential impacts to the human and natural environment associated with the reuse of the base following closure pursuant to the Defense Base Closure and Realignment Act of 1990. The DEIS considers two alternatives for redevelopment. Alternative 1, the preferred alternative, is consistent with the Reuse Master Plan developed by the Brunswick Local Redevelopment Authority. Under this alternative the development program for the base would cover 1,630 acres (51% of the base) and includes land use districts to allow for aviation operations and related business, professional office space, community mixed use, business and technology industries, education, residences, recreation and open space and natural areas (with recreation and open space and natural areas comprising 49% of the total base area). Alternative 2 includes a higher density residential and mixed use development than Alternative 1 with no airfield facility. Specifically, the development program for the base under Alternative 2 would cover 1,580 acres (49% of the base) and includes land use districts to allow for community mixed use, business and technology industries, education, residences, recreation and open space and natural areas (with recreation and open space and natural areas comprising 51% of the total base area). A twenty year development timeline was used to project impacts for both alternatives.

EPA participated in a project scoping meeting on November 14, 2008 and subsequently issued scoping comments on December 2, 2008 in response to the Navy Notice of Intent to prepare an EIS. Our scoping comments recommended that the DEIS address direct,

indirect and cumulative impacts of the redevelopment (with a particular emphasis on evaluation of the potential for secondary/indirect impacts that could occur off the base). EPA specifically recommended that the EIS analyze each alternative with and without the proposed offsite transportation improvements (the connector road and interchange to connect to US Route 1) to determine how the redevelopment would function under each scenario and to fully identify the environmental impacts associated with each of these transportation options. Our scoping comments also addressed wetlands, air quality, water supply, greenhouse gas emissions, green buildings and energy considerations.

We were surprised and concerned to see that our scoping comments were not included in the "Agency Correspondence" section of the DEIS. Our level of concern increased when we noticed that the DEIS contains almost no discussion of secondary/indirect impacts. The attachment to this letter contains our specific comments. We recommend that the Navy work to resolve this deficiency in the DEIS by presenting an analysis of secondary/indirect impacts for public review prior to the release of the FEIS. The attachment also provides comments on wetland, water quality and air issues. We are willing to discuss any questions regarding our comments with the Navy and the consulting team working to prepare the FEIS as necessary.

We appreciate the opportunity to comment on the DEIS for the disposal and reuse of NAS Brunswick. Based on our review of the DEIS we have rated the DEIS "EC-2—Environmental Concerns-Insufficient Information" in accordance with EPA's national rating system, a description of which is attached to this letter. Please contact Timothy Timmermann (617-918-1025) of EPA's Office of Environmental Review with any comments or questions about this letter.

Sincerely,

H. Curtis Spalding
Regional Administrator

Attachment

A-5

Summary of Rating Definitions and Follow-up Action

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

EPA Comments on the DEIS for the Disposal and Reuse of NAS Brunswick, Brunswick, Maine

Indirect Impacts

The Council on Environmental Quality's Regulations for Implementing NEPA require that all EISs contain an analysis of indirect impacts. 40 CFR 1502.16(b). The CEQ regulations define indirect effects (often called 'secondary effects') as follows: "Indirect effects...are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 CFR 1508.8(b). In the case of this project, indirect effects may include growth and/or development outside the base boundary that is induced by redevelopment within the base boundary. The NAS Brunswick DEIS contains an incomplete analysis of indirect impacts, and this needs to be corrected.

We note that the DEIS contains an analysis of development that is expected to occur on the base and associated properties under complete build-out. We believe this analysis is thorough and well-documented. What is missing from the DEIS, however, is an analysis of the potential for population and employment growth to occur off the base that is induced by base redevelopment. We were puzzled that this omission occurred despite EPA's scoping comments offered during the November 2008 scoping meeting and subsequent December 2008 written scoping comments. Those comments called for an evaluation of the potential for secondary impacts that would occur off the base associated with residential and commercial development stimulated by base redevelopment. Our comments also recommended an analysis of the impacts of the project both with and without the Route 1 connector. We note that the DEIS includes mention of the potential for such off-base impacts in a few places (e.g., on page 4-20 it is stated that "...Alternative 1 also would result in an indirect demand for off-site housing and commercial space to serve residents and businesses moving into the immediate project area." Similar language can be found on pages 4-29 and 4-36 of the DEIS. The analysis should go beyond general statements such as these, however, and provide a quantitative estimate of the potential magnitude of the growth in population and employment in the surrounding area, and its associated environmental impacts.

After reviewing the DEIS and seeing that it did not include an analysis of the potential secondary impacts of off-base development, EPA contacted the Navy and after a conference call on May 26, 2010 we provided the Navy and their consultant with reference materials on methods for analyzing secondary impacts. Although these documents were written for highway projects, the same approaches will work for the base redevelopment analysis. During the call we noted that the state of practice in analyzing secondary and cumulative impacts has advanced significantly in recent years, and there is a range of methods available for conducting an adequate analysis. Two sources of information for such methods are National Cooperative Highway Research Program

Text and quantitative data for indirect impacts have been added to the EIS in Sections 4.2.1 and 4.2.2 - Socioeconomics under Alternatives 1 and 2, respectively. This new analysis assesses the potential indirect, off-base impacts specific to employment. Employment was viewed as the primary driver for this analysis due to job creation proposed on-base. The summary contained in Sections 4.2.1.3 and 4.2.2.3, as well as Appendix N, outlines the methodology for analyzing indirect impacts. Specifically, text has been added in the following sections: 4.2; 4.2.1.1; 4.2.1.3; 4.2.2.1; and 4.2.2.3.

Using the results from the change in indirect, off-base employment impacts, and as outlined in Sections 4.2.1.1; 4.2.2.1; and Appendix N, it is assumed that there would not be any significant change in the population and housing beyond what is already analyzed and presented in the EIS under direct impacts. The current civilian labor force, projected population growth rate over the next 20 years, the number of housing vacancies and the proportion of workers who commute to the area all combine to reduce the effect on of the potential off-base employment growth on population and housing within the Brunswick LMA.

The change in indirect, off-base employment was incorporated into the transportation analysis, which is provided in Sections 4.4.2, 4.4.3, and 4.4.4 - Transportation under Alternatives 1 and 2, respectively. It was determined that even if the population of the study area (Brunswick LMA) does not increase significantly due to the change in off-base employment, there would still be an increase in the number of vehicle trips associated with the jobs that would be created. This methodology is included in Appendix N (subsection N-4).

In addition, the technical memo outlining the changes in the transportation analysis from the DEIS to the FEIS is provided in Appendix D, along with revised tables that incorporate the indirect, off-base employment impacts.

Discussions with EPA concluded that the indirect impact analysis could be added to the FEIS rather than issuing a revised DEIS. Adding indirect impacts to the analysis did not change the impact conclusions in the DEIS.

PC002-1

PC002-1
Continued

A-7

Report 423 A (*Land Use Impacts of Transportation: A Guidebook*) or National Cooperative Highway Research Program Report 466 (*Desk Reference for Estimating the Indirect Effects of Proposed Transportation Projects*). EPA is willing to discuss the analysis with the Navy and their consultant, if that would be helpful.

Because the analysis of indirect impacts was insufficient in the DEIS we recommend that subsequent analysis of potential secondary impacts off-base be developed and distributed for public and agency review and comment prior to publication of the FEIS. In this manner the information in the DEIS can be supplemented and any comments received on the expanded evaluation can be addressed in the FEIS. The FEIS should also describe the impacts of the project both with and without the Route 1 Connector project.

Cumulative Impacts

The analysis of cumulative impacts in the FEIS should be revised to incorporate the extension of the Downeaster train service from Portland to Brunswick. It is our understanding that this project has been funded by US DOT’s High-Speed Intercity Passenger Rail Program.

Wetlands

Page 5-8 of the Wetlands Functional Assessment Report (Appendix G of the DEIS) notes that four wetlands in the western portion of the NAS Brunswick do not have an apparent surface water connection to waters of the U.S and therefore are not considered jurisdictional by the US Army Corps of Engineers. For clarification, please explain whether a jurisdictional determination has been done by the Army Corps of Engineers on these wetlands (Cluster 14).

Stormwater Management

Both alternative development scenarios (at full build out) result in significant increases in impervious cover over existing conditions (including an 11% increase in impervious surface for Alternative 1 and a 14% increase for Alternative 2). Stormwater from these new impervious surfaces will impact the watershed if appropriate stormwater management practices are not put in place. The DEIS (page 4-151) notes that the “entity responsible for implementing any storm water system improvements has not yet been determined, and funding for these improvements has not been secured. Upon disposal of the federally owned and maintained property, the party responsible for making the system improvements would need to be identified.” We believe that the FEIS should identify the measures that can be adopted to demonstrate how the increased stormwater flows will be addressed to prevent an increase in flows above pre-development levels consistent with the Energy Independence and Security Act (EISA). EISA requires that all federal facility development and redevelopment projects larger than 5000 square feet maintain or restore the predevelopment hydrology of the property. For your reference, a copy of the technical guidance to aid compliance with EISA can be found at <http://www.epa.gov/owow/nps/lid/section438>. The technical guidance recommends the adoption of low impact development (LID) measures including the use of porous pavement, infiltration zones, vegetated roofs vegetated swales and constructed wetlands for stormwater treatment, and other techniques to minimize adverse environmental

PC002-2

Transportation analysis for Alternatives 1 and 2 with and without the Route 1 Connector have been added to the EIS in Sections 4.4.2.2; 4.4.2.3; 4.4.3.2; and 4.4.3.3; and are also outlined in the technical memo and table revisions provided in Appendix D.

PC002-1
Continued

PC002-2

PC002-3

PC002-3

Extension of the Downeaster train service from Portland to Brunswick has been added to the Cumulative Impact Analysis, in Section 5.2.3.

PC002-4

PC002-4

A jurisdictional determination (JD) has not been conducted for these wetlands. A wetland delineation survey will need to be completed as part of future redevelopment. Text clarifying the need for a full wetland delineation has been added to the EIS in Sections 4.11.1.4 and 4.11.2.4.

PC002-5

The requirements outlined in Section 438 of EISA would not apply to this action based upon the act of transferring NAS Brunswick out of federal ownership. However, text was added to the EIS in Sections 4.8.1.3 and 4.8.2.3 under the bolded title "Section 438 of the Energy Independence and Security Act of 2007." This states that it is expected that redevelopment would follow MRRRA's "Community Design Guidelines Summary" and thus would incorporate low-impact development, smart growth principles, and best management practices that would parallel the requirements outlined in Section 438 of EISA.

PC002-5

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impacts. We recommend that the Navy require that the transfer of the base property to the local redevelopment authority be contingent upon a requirement that stormwater flow will not exceed pre-development levels consistent with EISA.

Section 3.5 - Environmental Management

We believe the information contained in this section was generally very accurate up to and including 2009. Identified future actions to be taken by the Navy at the various CERCLA and petroleum sites are also generally consistent with EPA expectations for the sites. We note that in Section 3.5.4.1, Page 3-72, ¶4 (Eastern Plume Operable Unit) the last sentence states that a final ROD for the Eastern Plume is planned. This statement is incorrect as the Final ROD for the Eastern Plume Site was completed in February 1998. The FEIS should be revised to reflect this.

Greenhouse Gas Emissions/Energy Efficiency

EPA appreciates the Navy’s effort to incorporate a greenhouse gas emissions analysis for the project in the EIS. The discussion of energy efficiency measures lists the Energy Star and LEED programs as methods to mitigate emissions from new and existing buildings in the redevelopment area. We encourage the Navy to work with the local community toward adoption of regulations that require that these measures be implemented by the development program that follows base closure. We also continue to recommend that the FEIS include a discussion whether or not any portion of the energy demand for the redevelopment could be met by renewable energy generation facilities on base property. Specifically, the FEIS should include reference to the efforts of the Midcoast Regional Redevelopment Authority (MRRRA) to establish a “clean energy park” on the base.

Construction Emissions

The discussion of construction period emissions (DEIS Page 4-114) notes that “exhaust emissions from construction vehicles can be reduced by using fuel-efficient vehicles with emission controls...” Given the public health concerns about diesel exhaust from heavy duty diesel trucks and other heavy duty construction equipment, EPA typically recommends that measures be implemented to reduce fine particle emissions from diesel engines during construction. In this case we suggest that the Navy make emission controls during construction a condition of property transfer. Emissions from older diesel engines can be controlled with retrofit pollution control equipment such as diesel oxidation catalysts or particulate filters that can be installed on the exhaust of the diesel engine. Retrofits have been successfully applied to many diesel engines across the country and oxidation catalyst technology has been successfully applied to construction equipment used on several projects in the Northeast, including the Central Artery/Third Harbor Tunnel project in Boston. Retrofit technologies may include EPA verified emission control technologies and fuels and CARB-verified emission control technologies. These lists can be accessed at <http://www.epa.gov/otaq/retrofit/verified-list.htm>.

PC002-5
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PC002-6

Text in Section 3.5.4.1 has been updated to state the final ROD for the Eastern Plume was completed in February 1998.

PC002-6

PC002-7

Text has been updated in the EIS in Sections 4.6.1.1; 4.6.1.2; 4.6.2.1; and 4.6.2.2 to reflect the comment.

PC002-7

It is MRRRA's vision, as outlined in their "Community Design Guidelines Summary" that the redevelopment of the installation will incorporate sustainable and energy conservation elements to its overall design. As a part of this effort, guidelines for the control of emissions and energy efficiency related to construction can be implemented.

PC002-8

Text has been added in the EIS in Sections 4.6.1.1; 4.6.1.2; 4.6.2.1; and 4.6.2.2 to recommend the implementation of emission control and energy efficiency guidelines by the MRRRA.

PC002-8

It is MRRRA's vision, as outlined in their "Community Design Guidelines Summary" that the redevelopment of the installation will incorporate sustainable and energy conservation elements to its overall design. As a part of this effort, guidelines for the control of emissions and energy efficiency related to construction can be implemented.

A-9



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
408 Atlantic Avenue - Room 142
Boston, Massachusetts 02210-3334



PC003-1

Thank you for your comment.

June 22, 2010

9043.1
ER 10/447

David Drozd, Director
BRAC Program Management Office Northeast
Department of the Navy
4911 Broad Street
Philadelphia, PA 19112

RE: COMMENTS
Draft Environmental Impact Statement (DEIS) for the Brunswick Naval Air Station, Disposal and Reuse, Implementation, Brunswick, Maine

Dear Mr. Drozd:

The U.S. Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Brunswick Naval Air Station, Disposal and Reuse, Implementation, Brunswick, Maine. The Department has no comment on the DEIS.

PC003-1

Thank you for the opportunity to review and comment on this DEIS. Please contact me at (617) 223-8565 if I can be of assistance.

Sincerely,

Andrew L. Raddant
Regional Environmental Officer

A-10

Public Hearing Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station (NAS) Brunswick, Maine



PC004

You are invited to comment on the Draft Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station (NAS) Brunswick, Brunswick, Maine. To be most helpful, comments on the Draft EIS should be clearly written and describe specific issues, topics or page numbers from the document. Comments may be submitted in one of the following five ways: (1) fill out this comment sheet and drop it into a comment box before leaving the public hearing, (2) mail your comments using this form, (3) fax your comments to (215) 897-4902 Attn: Brunswick EIS, (4) e-mail your comments to david.drozdz@navy.mil, or (5) speak your comment at the public hearing, which will be recorded by a court reporter.

All comments must be postmarked by June 28, 2010

pg. 3-161 Sect. 3.12.4

Vernal Pools: Figure 3.12-3

Shows entire base to include USA 51AC but does not include the two SVP on USA Parcel.

The Maine National Guard will provide SVP data + map coverage to correct this

pg 3-132 Sect 3.11.4 Wetlands

Figure 3.11-3 Wetland Reconnaissance Survey

Shows again the entire parcel to include USA 51AC SITE. Does not show our wetlands

The Maine National Guard will provide Wetland Survey data + map coverage.

PC004-1

PC004-2

Additional wetland areas, as identified and provided by the Maine Army National Guard, were added to Figure 3.11-3. Text in the EIS was not modified as these wetlands occur in parcel to be transferred to Department of the Army. Impacts to these wetlands have been assessed under the NEPA process by the Department of the Army. A Finding of No Significant Impact (FONSI) for the Environmental Assessment for the Maine Army National Guard and Maine Corps Readiness Centers, Brunswick, Maine, was signed on July 19, 2010.

PC004-2

PLEASE PRINT * ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name DAVID BRANDT

2. Address Maine Army National Guard

3. E-mail david.h.brandt@us.army.mil

4. Please check here if you would NOT like to be on the mailing list

5. Please check here if you would like your name/address kept private

Please drop this form into one of the Comment Boxes here at the PUBLIC HEARING MEETING or fold (see fold lines on back) and mail.

YOUR INPUT MATTERS



JOHN ELIAS BALDACCI
GOVERNOR

STATE OF MAINE
DEPARTMENT OF TRANSPORTATION
16 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0016

DAVID A. COLE
COMMISSIONER

June 28, 2010

Department of the Navy
BRAC Program Management Office Northeast
Director, David Drozd
Attn: Brunswick EIS
4911 Broad Street
Philadelphia, PA 19112
Fax: (215) 897-4902
david.drozd@navy.mil

Re: Draft Environmental Impact Statement for the Disposal and Reuse of Naval Air Station
Brunswick, Maine

Dear Mr. Drozd,

The Maine Department of Transportation (MaineDOT) appreciates the opportunity to provide formal comments on the Department of the Navy's Draft Environmental Impact Statement for the Disposal and Reuse of Naval Air Station Brunswick, Maine (DEIS-NASB). Considering the significance of the proposed disposal and reuse of the Naval Air Station and concerns for the potential impacts that would be imposed on the State of Maine, the citizens of Brunswick, Topsham and Mid-Coast Maine I respectfully submit the following comments that in accordance with CFR 771.130(a)(2) the DEIS-NASB requires the preparation of a Supplemental Draft Environmental Impact Statement (SDEIS).

1. Following the November 14, 2008 Interagency Meeting MaineDOT provided comments on the Scoping activities for the Department of the Navy's Environmental Impact Statement Brunswick. (Christopher A. Mann to Director David Drozd, November 24, 2008) The 2008 letter requested clarification of the Navy's statement the EIS will "quantify existing off-base traffic volumes, project future traffic conditions, and identify potential impacts", as well as, analyze/quantify proposed off-base and on-base transportation improvement projects identified in the Brunswick Naval Air Station Reuse Master Plan". A response was not received.
2. The DEIS-NASB lacks existing and future origin/destination data for traffic entering and leaving NASB. This data is critical for undertaking the analysis and identifying mitigation requirements associated for the off-base transportation network serving the NASB infrastructure.
3. Page 4-68 Table 4.4-1, page 4-69, page 4-71 Figure 4.4.2 and page 4-81, Table 4.4-8 the DEIS-NASB identifies required transportation network mitigation that is crucial to the success of the redevelopment of NASB as the responsibility of others, i.e. "Navy plays no role and has no responsibility in the environmental review, planning, design, or construction of highways or rail infrastructure."
 - The DEIS-NASB lacks analysis of each alternative with and without the proposed transportation improvements (the connector road and interchange to U.S. Route 1). This analysis is required to identify how each alternative will function under each scenario.



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THE MAINE DEPARTMENT OF TRANSPORTATION IS AN AFFIRMATIVE ACTION - EQUAL OPPORTUNITY EMPLOYER

PC005

PC005-1

Responses to scoping letters are not normally provided in the NEPA process. These letters serve to focus the content of the DEIS. A traffic study was conducted to address traffic concerns. Based on comments on the DEIS, enhancements to the transportation section were included in the FEIS, Section 4.4.

PC005-2

A copy of the Traffic Impact Study is included in Appendix D. A description of the trip assignment methodology is provided on page 21 of the Traffic Impact Study.

PC005-3

The Navy action is disposal of the property. The MRRA is responsible for implementation of the Reuse Plan. Recommended mitigation measures for Alternatives 1 and 2 and the No-Action Alternative are included in Sections 4.4.2.4; 4.4.3.4; and 4.4.4.4. Some traffic mitigation projects, as identified in the EIS, would be required based on either current conditions or projected growth in the town without the redevelopment of the installation. Other projects may need to be implemented by the developer in consultation with MaineDOT and the town as traffic conditions warrant during development of the former installation.

PC005-1

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PC005-4

PC005-3

The traffic analysis added under Alternative 1 (Sections 4.4.2.2 and 4.4.2.3) and Alternative 2 (Sections 4.4.3.2 and 4.4.3.3), presents data for the scenario where the Route 1 Connector is not built. It should be noted however, the adjacent road network cannot feasibly handle the forecasted traffic, even with significant improvements. Significant deficiencies and gridlock are identified if the project is not constructed in the early phases of redevelopment. Without implementation of the Route 1 Connector there would be significant impacts on intersection's level of service (LOS). Some intersections would be in gridlock by 2026, under Alternative 1, and 2021, under Alternative 2.

PC005-4

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A-13

- The DEIS-NASB lacks an implementation plan for the assumed roadway mitigation, as well as a funding commitment from external entities. Unfunded mitigation requirements will compromise the ability of the NASB redevelopment to succeed and leaves a significant financial burden on the Midcoast Regional Redevelopment Authority, the towns of Brunswick and Topsham and the citizens of Maine; the DEIS-NASB needs to include a qualitative and quantitative analysis of all identified required mitigation.[40 C.F.R. 1502.16(h) and 1508.20 (c) and (e)]
- 4. CEQ regulations require EISs to evaluate growth-inducing changes from proposed developments. As written the DEIS-NASB does not fully comply with CEQ requirements 1502.16, 1508.7, 1508.8, 1508.25 (a) & (c) and 1508.27 the need to clearly analyze the direct, indirect and cumulative impacts of all affected resources. The DEIS-NASB does not analyze the full impacts from base redevelopment on the external transportation infrastructure and the potential for residential or commercial development outside the base that may be stimulated by the NASB redevelopment.
 - Page 4-70 states the “Full build-out of Alternative 1 [the preferred alternative] would add a projected 6,473 vehicle trips to the existing network of roads near NAS Brunswick” an increase of 5,217 vehicles over the existing condition generated by NAS Brunswick (pages 4-70 to 71). The DEIS-NASB primarily focuses on the transportation impacts to the internal and boundary roadway network; while excluding assessment of the potential of significant impact to the same off-base resources. The State of Maine considers this a “fatal flaw” as off-base traffic congestion will be critical factors in the success or failure of the NASB redevelopment.
 - Page 4-81. AP-2 *Recommended Mitigation* discussion states beyond 2016 the adjacent road network will be “unable to handle the traffic project” from implementation of the Preferred Alternative without providing the analysis of the significance of the impact. The potential impact could affect the redevelopment of the NASB to attract the required level of off-base traffic to be successful.
- 5. Page 4-70 states integrating NASB transportation network will “likely improve overall traffic flow” without justification or backup data for this statement. The citizens of Maine request the opportunity to review the quantitative analysis that supports the Navy’s assessment of traffic flow.
- 6. Page 4-71, Table 4.4-2 identifies six (6) new NASB access/egress points and states the majority of traffic is projected to use the U.S. Route 1 Connector. The off-base transportation network at Route 1 and Cook’s Corner is already congested and lacks significant foreseeable funding to provide improvements. The DEIS-NASB lacks a quantitative traffic analysis of the impacts to the off-base transportation network, therefore the State of Maine is requesting a quantitative analysis of the impacts of the new access points in a SDEIS, prior to a final decision on the Preferred Alternative.
- 7. Page 4-77, Table 4.4-7 Intersection Level-of-Service. The Navy must provide further explanation as to why the identified 5 year improvements (2016 improvement requirements) are required for intersections with an existing (2008) LOS of A to D. MaineDOT often uses level of service D as desirable peak-hour condition, we know there are many cases where you can’t build your way out of a level of service E. Left turns from a driveway or side street onto a heavily traveled route will often never get out of level of service E or F.
- 8. Page 4-78 Section 4.4.2.4 states that traffic conditions will be worse than projected without the proposed mitigation without including a quantitative analysis of potential future conditions.
- 9. Page 4-78 for a full disclosure NEPA document the Navy needs to provide an analysis of pedestrian and alternative modes requirements for the redeveloped NASB.

PC005-5

PC005-5

The Navy action is disposal of the property. The MRRRA is responsible for implementation of the Reuse Plan. Recommended mitigation measures for Alternatives 1 and 2 and the No-Action Alternative are included in Sections 4.4.2.4; 4.4.3.4; and 4.4.4.4. Some traffic mitigation projects, as identified in the EIS, would be required based on either current conditions or projected growth in the town without the redevelopment of the installation. Other projects may need to be implemented by the developer in consultation with MaineDOT and the town as traffic conditions warrant during development of the former installation.

PC005-6

PC005-6

The change in indirect, off-base employment has been incorporated into the transportation analysis, provided in Sections 4.4.2; 4.4.3; and 4.4.4.

PC005-7

PC005-8

PC005-7

Indirect impacts on the surrounding off-base transportation network are discussed in Sections 4.4.2; 4.4.3; and 4.4.4. A copy of the Traffic Impact Study is included in Appendix D. A description of the trip assignment methodology is provided on page 21 of the Traffic Impact Study.

PC005-10

PC005-11

PC005-8

Transportation analyses for Alternatives 1 and 2 with and without the proposed Route 1 Connector have been added in Sections 4.4.2.2; 4.4.2.3; 4.4.3.2; and 4.4.3.3.

PC005-12

PC005-13

PC005-9

The Traffic Impact Study is provided in Appendix D.

PC005-10

PC005

The Cooks Corner intersection was included for analysis in the Traffic Impact Study with the assumption that the US Route 1 Connector would be constructed after the five-year scenario. The study has been updated to include the analysis of the without improvement scenario and failing levels of service at affected intersections over time. The Traffic Impact Study is provided in Appendix D.

The rating provided by US EPA on this DEIS (EC-2) recommends that "...identified additional information, data, analyses, or discussion should be included in the final EIS." A Supplemental DEIS is not required by EPA.

PC005-11

Table 4.4-7 provides LOS for the overall intersections for the purpose of NEPA impact assessment. LOS for individual movements was not calculated. MaineDOT typically requires mitigation for any individual movement falling below LOS D, if possible. Although LOS D may sometimes be acceptable for peak-hour conditions, the queue length created by a particular movement may begin to impact other critical movements, requiring the need for mitigation.

PC005-12

Transportation analyses for Alternatives 1 and 2 with and without the proposed Route 1 Connector have been added in Sections 4.4.2.2; 4.4.2.3; 4.4.3.2; and 4.4.3.3.

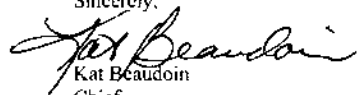
PC005-13

A copy of the Traffic Impact Study is provided in Appendix D and includes the assumptions for alternative modes of transportation which were applied to the analysis. Recommendations for bicycle, pedestrian, and bus accommodations have been added to Section 4.4.2.5.

Maine Department of Transportation comments on the DEIS for the Disposal and Reuse of Naval Air Station Brunswick, Maine

- 10. Chapter 5. Cumulative Impact Assessment: The following analysis must be provided to complete documentation of the transportation network cumulative impacts: analyze and identify the breadth of the transportation problems that will occur as a result of implementing a build alternative; analyze the impacts of off-base transportation network mitigation; analyze how future off-base land use changes may impact the transportation network and how the required mitigation will maintain the off-base transportation network at an acceptable LOS.
- 11. Page 6-4, states that implementation of either build alternative would "increase total weekday traffic near the installation" and there will be "No significant impact" on the LOS "assuming implementation of appropriate mitigation". To provide a complete NEPA document the Navy must analyze the potential impacts of the alternatives without the assumption of others providing the assumed unfunded traffic mitigation.
- 12. Document Corrections:
Pages 4-76 footnote 2; 4-96 table 4.4-18 footnote 2 delete the statement: "The State of Maine Department of Transportation is currently planning to improve the Bath Road and Maine Street rotary intersection. Since the final design and in [sic] unknown, future traffic conditions cannot be projected (Gorrill-Palmer 2009)." Correction: In 2004 MaineDOT received a project request for improvement of the Maine Street at Bath Road intersection, as of June 24, 2010 that request has not received planning or construction funding in a MaineDOT Capital Improvement Plan. (Source: MaineDOT ProjEx database, PSN 27546, Brunswick, Maine Street at Bath Road.)

MaineDOT requests that the Navy prepare a SDEIS to provide a complete disclosure of the potential impacts to the off-base transportation and land use resources. Following that, there should be an opportunity for public comment prior to the preparation of the Final Environmental Impact Statement and the Record of Decision. I look forward to your response.

Sincerely,

 Kat Beaudoin
 Chief
 Bureau of Transportation Systems Planning
 Maine Department of Transportation

cc. John E. Baldacci, Governor
David A. Cole, MaineDOT Commissioner

A-15

PC005-14

PC005-14

Cumulative impacts on transportation are included in Section 5. Indirect impacts on transportation have been added to the EIS in Sections 4.4.2 and 4.4.3 for Alternative 1 and Alternative 2, respectively, as well as in the Section 5.3.4 -Cumulative Impacts on Transportation. In addition, local planning efforts are underway to identify means to reduce traffic impacts. MaineDOT has commissioned a separate Transportation Study from Vanasse Hangen Brustlin (VHB) to analyze the transportation impacts associated with the redevelopment of NAS Brunswick. The Gateway 1 Corridor Final Plan, similarly considers traffic mitigation measures, including the proposed Route 1 Connector. MaineDOT study by VHB will include an in-depth review of the Route 1 Connector.

PC005-15

PC005-15

PC005-17

Transportation analyses for Alternatives 1 and 2 with and without the proposed Route 1 Connector have been added in Sections 4.4.2.2; 4.4.2.3; 4.4.3.2; and 4.4.3.3.

PC005-16

Text of footnote 2 on Table 4.4-18 has been updated with the correction as noted in the comment. The reference "MaineDOT 2010" has been added to Section 8, References.

PC005-17

The rating provided by US EPA on this DEIS (EC-2), recommends that "...identified additional information, data, analyses, or discussion should be included in the final EIS." A Supplemental DEIS is not required by EPA. The guidance referenced in the comment refers to Federal Highway Administration projects.

PC006-1

Thank you for your comment.

From: Stancampiano, Robin [REDACTED]
To: Drozd, David CIV OASN (EI&E), BRAC PMO NE
Cc: [REDACTED]
Sent: Wed Jun 09 15:54:57 2010
Subject: MPH# 2196-08 DEIS Disposal and Reuse of NAS Brunswick, ME

MPHC# 2196-08 DEIS Disposal and Reuse of NAS Brunswick, ME

David-

In response to your recent request, our office has reviewed the information received May 6 and 24, 2010 to continue consultation on the above referenced undertaking in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

Our office has reviewed the DEIS and concurs with the Navy's comments in the cultural resources sections. Regarding archaeological resources, legally binding restrictions in deeds per section 4.9.4. (page 4-156) are acceptable to our office for mitigation measures. We have been reviewing and commenting on the architectural survey drafts from your consultant.

PC006-1

We look forward to continuing consultation with the Navy on this project.

Robin Stancampiano
--Review & Compliance Coordinator
--Certified Local Government Coordinator
Maine Historic Preservation Commission
55 Capitol Street
65 State House Station
Augusta, ME 04333

<http://www.maine.gov/mhpc>

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State of Maine
Office of the Governor
1 State House Station
Augusta, Maine 04333

Date: 6/28/10

Total Number of Pages: 17
(including cover page)

To: David Drozd

Fax Number: 215-897-4902

Company: _____

From: Jim Nimou

Subject: Draft EIS

Phone Number: 207-287-3531 Fax Number: 207-287-1034

Comments:

*DIF + MNAP comments -
Original letter to go in the mail.*

A-17



JOHN ELIAS BALDACCIO
GOVERNOR

STATE OF MAINE
DEPARTMENT OF
INLAND FISHERIES AND WILDLIFE
284 STATE STREET
41 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0043

ROLAND D. MARTIN
COMMISSIONER

June 23, 2010

David Drozd
Director, BRAC Program Management Office Northeast
Attn: Brunswick EIS
4911 Broad Street, Building 679
Philadelphia, PA 19112-1303

RE: Draft Environmental Impact Statement for the Disposal and Reuse of the Naval Air Station Brunswick, Maine

Dear Mr. Drozd:

On behalf of the Maine Department of Inland Fisheries and Wildlife (MDIF&W) and Maine Natural Areas Program (MNAP) I am pleased to offer the following comments regarding the draft EIS for the reuse and disposal of the Brunswick Naval Station.

The Naval Air Station lands support known occurrences of several state listed endangered, threatened, and special concern plant and animal species, critically imperiled habitat types on which those species depend, state identified significant wildlife habitats, and integral components of one of Maine's designated Important Bird Areas. For these reasons as well as others clarified in the attached appendix, we are strongly recommending that the proposed plan for facility reuse be revised to:

1. Include the extent of the Little Bluestem-Blueberry Sandplain Grassland / Endangered Grasshopper Sparrow Habitat adjacent to northern portions of the existing runways as illustrated on Map 1, depicted in red cross-hatch (attached) in a Natural Areas land use district, or if necessary, Airport Operations District that prohibits structures and other activities that alter significant plant and animal habitat values other than for the management of grassland habitat and runway apron maintenance consistent with bullet 3 below;
2. Include the extent of the Little Bluestem-Blueberry Sandplain Grassland natural community at the East Brunswick Radio Transmitter Site as illustrated in Figures 1 & 2 (attached) in a Natural Areas land use district that prohibits structures and other activities that alter significant plant and animal habitat values other than for the management of grassland habitat and passive recreational activities consistent with bullet 3 below

PC007-1

The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts approved in the Reuse Master Plan.

As stated in Section 4.12.1.3 ("State-listed Threatened and Endangered Species") and elsewhere in the EIS, any party proposing development or other land disturbance in districts containing Sandplain Grassland habitat would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances

PC007-2

The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts approved in the Reuse Master Plan.

As stated in Section 4.12.1.1, the East Brunswick Radio Transmitter Site is designated an Open Space/Recreation/Natural Area land use district. As further stated in Section 4.12.1.3 ("State-listed Species of Special Concern"), the MDIFW and MNAP would need to review and approve any development plans that involve impacts to the Sandplain Grassland habitat due to potentially significant impacts on state-listed species of special concern.

81-V

PC007-1

PC007-2

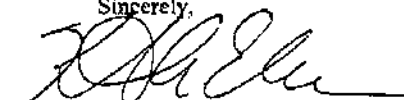
- 3. Require that MDIF&W and MNAP be included in the development of a management plan for both areas referenced above in collaboration with future property owners. The goals of the management plans shall include maintenance and enhancement of significant plant and animal habitats; runway apron maintenance that satisfies FAA requirements for civilian use; and development of passive recreational amenities that minimize resource conflicts.

PC007-3

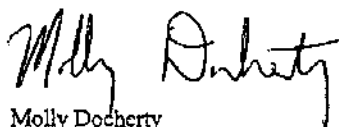
We feel that these 3 changes will satisfy our primary concerns regarding the proposed reuse plan and will benefit future redevelopment and economic opportunity by minimizing regulatory burden and project review required by our Departments. Additionally, these changes will safeguard the irreplaceable natural resources that have benefitted from Department of Defense ownership of the Brunswick Naval Air Station lands and will ensure their presence for future generations of Maine citizens. Specific comments regarding the draft EIS follow in Appendix A.

Please do not hesitate to contact our offices if you have any questions regarding these comments, or if we can be of any further assistance with the EIS review process. We encourage the Navy and Midcoast Region Redevelopment Authority to obtain and use our data in their future analyses and refinement of the Draft EIS.

Sincerely,



Ken Elowe
 Director,
 Bureau of Resource Management
 Maine Department of Inland Fisheries and Wildlife



Molly Docherty
 Director,
 Maine Natural Areas Program
 Maine Department of Conservation

A-19

Enclosures:

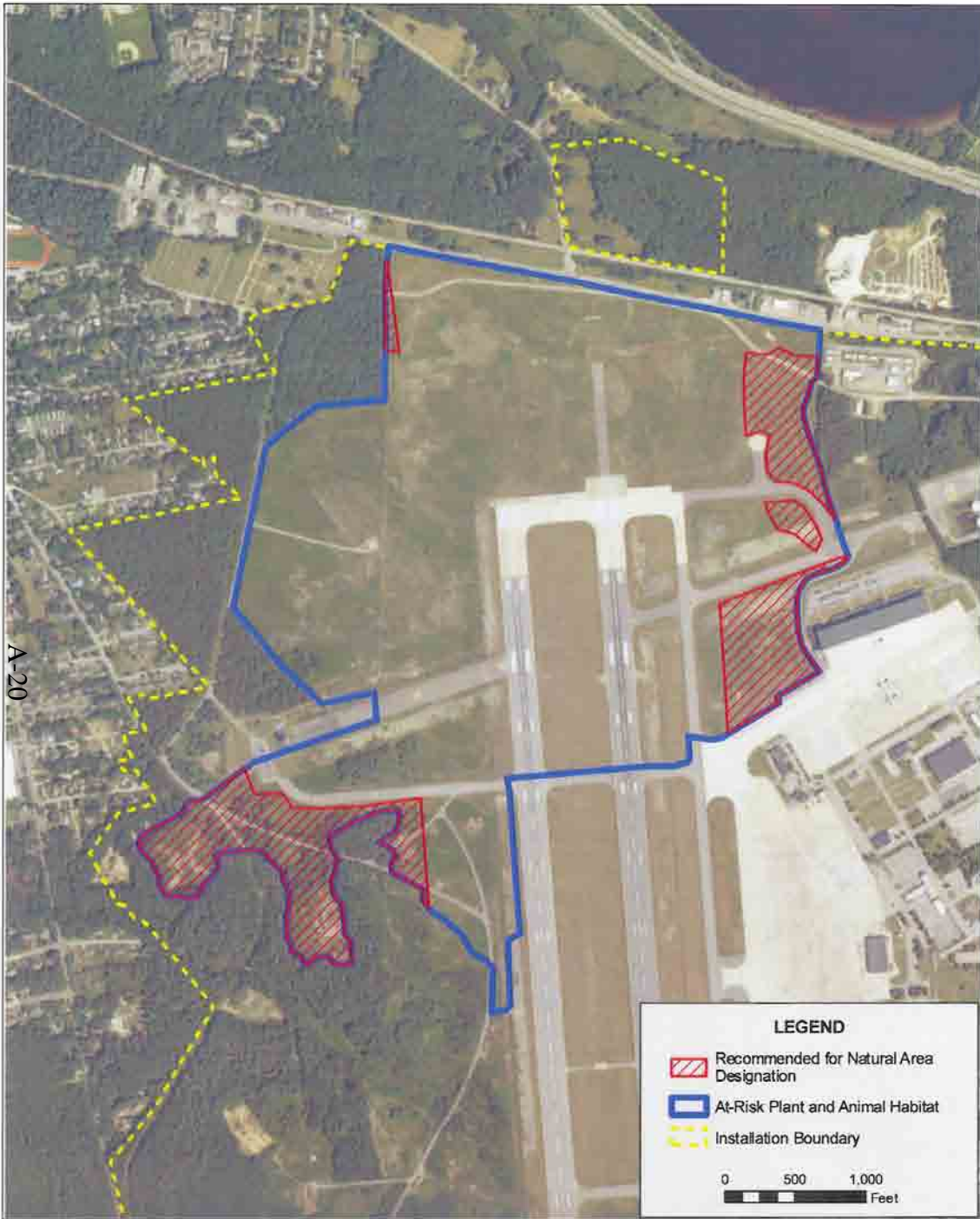
- Map 1. At-Risk Plant & Animal Habitat Recommended for Natural Areas Designation
- Appendix A. MDIFW and MNAP Joint Comments on the Draft EIS for the Disposal and Reuse of the Naval Air Station, Brunswick, Maine

Cc: Mr. Jim Nimon, Office of Governor E. John Baldacci
 Ms. Karin Tilberg, Office of Governor John E. Baldacci
 Mr. Steve Levesque, Executive Director MRRA

PC007-3

The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change the Reuse Master Plan.

As stated in Section 4.12.1.3 ("State-listed Threatened and Endangered Species") and elsewhere in the EIS, any party proposing development or other land disturbance in districts containing Sandplain Grassland habitat would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.



A-20



Appendix A

Maine Department of Inland Fisheries and Wildlife
Maine Natural Areas ProgramJoint Comments on the Draft Environmental Impact Statement for the Disposal and Reuse
of the Naval Air Station Brunswick, Maine1. MDIF&W Documented Priorities

Between 2006 and 2009 through a series of meetings the Maine Department of Inland Fisheries and Wildlife (MDIFW) submitted comments to the Town of Brunswick, Brunswick Local Redevelopment Authority (BLRA) and BRAC Program Management Office outlining MDIFW state wildlife priorities for protection, concern regarding the reuse master plan, redesign recommendations to not include endangered species habitat, and identified future development of the grasshopper sparrow habitat as a possible illegal taking under the Maine Endangered Species Act.

The table below summarizes wildlife occurrences documented by the Maine Department of Inland Fisheries and Wildlife on BNAS lands.

Scientific Name	Common Name	Global Rarity Rank	State Rarity Rank	State Protection Status
<i>Anmodramus caudacutus</i>	Grasshopper sparrow	G4	S3B	Endangered
<i>Bartramia longicauda</i>	Upland sandpiper	G5	S3B	Threatened
<i>Eremophila alpestris</i>	Horned lark	G5	S3B	Special Concern
<i>Sturnella magna</i>	Eastern meadowlark	G5	S3S4B	Special Concern
<i>Anmodramus caudacutus</i>	Saltmarsh sparrow	G4	S3B	Special Concern
<i>Hesperia metea</i>	Cobweb skipper	G4	S2S3	Special Concern

Also attached as Figures 1 & 2 are two maps depicting MNAP and MDIFW features in relation to proposed land use designations on BNAS lands.

Throughout this time, MDIF&W also offered to assist in survey efforts to better document species occurrences and habitats on base lands. In December of 2006, these priorities and offers of technical assistance were re-iterated in a letter to Representative Stan Gerzofsky signed jointly by our Commissioner and the Commissioner of the Department of Conservation.

We remain opposed to the rezoning of critical habitat areas for development purposes especially given the availability of alternative locations suitable for development elsewhere on the 3,200-acre base property. The alternatives evaluated in this EIS have not included a feasible reuse scenario that could avoid direct impacts to endangered species habitat as suggested in previous comments. Additionally, the evaluation of Alternative 1 incorrectly characterizes the impact of the proposed professional office park by failing to identify that the 24-acre proposed development area and entrance road, although only approximately 12% of the mapped sandplain grassland, would directly impact historic core grasshopper sparrow breeding areas.

PC007-4

The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts approved in the Reuse Master Plan.

Section 4.12.1.3 of the EIS has been revised to include additional discussion of potential impacts to grasshopper sparrow breeding areas.

As stated in Section 4.12.1.3 ("State-listed Threatened and Endangered Species") and elsewhere in the EIS, any party proposing development or other land disturbance in districts containing Sandplain Grassland habitat would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

A-21

PC007-4

We strongly recommend that the proposed professional office re-use district, associated vehicular entryway from Bath Road and the proposed rail spur, be revised to not include areas of Little Bluestem-Lowbush Blueberry Sandplain Grassland natural community type or other suitable habitat conditions for grasshopper sparrow. Additionally, future re-use of the East Brunswick Transmitter Site should maximize conservation of the rare sandplain grassland habitat and the opportunity for managing this area to support rare species. Removing these areas from proposed development zones will minimize future review and permitting requirements related to redevelopment, add greater predictability for perspective developers, and greatly benefit recovery efforts for one of Maine's most endangered bird species.

PC007-4
Continued

PC007-5

Discussion of *Calamagrostis cinnoides* has been added to Section 3.12.3 in Table 3.12-3.

PC007-6

For the purposes of this EIS, vegetation communities on NAS Brunswick and its outlying properties have been classified in accordance with the *Natural Landscapes of Maine* (Gawler and Cutko 2004). The communities were identified based on a review of existing data and current aerial photography and a reconnaissance-level field survey. A detailed description of the ecological communities at NAS Brunswick is presented in the *Ecological Communities and Wetland Resources Report* (Appendix F). Results of the report are summarized in Section 3.12.1.

The ecological communities mapped in the EIS are intended for planning purposes. Any party proposing development or other land disturbance in ecological districts will be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

2. MNAP Documented Botanical Features

Between 2007 and 2009, through communication with members of the Brunswick Local Redevelopment Authority, MNAP provided information regarding known occurrences of rare and exemplary botanical features and recommended conservation strategies for these occurrences on the Brunswick Naval Air Station lands. The table below summarizes the rare and unique botanical features mapped by the Maine Natural Areas Program on BNAS lands.

Scientific Name	Common Name	Global Rarity Rank	State Rarity Rank	State Protection Status	Element Occurrence Rank
Little Bluestem - Blueberry Sand Plain Grasslands	Sandplain Grassland	GNR	S1	n/a	C-Fair
<i>Spartina saltmarsh</i>	Salt-hay Saltmarsh	G5	S3	n/a	E
<i>Carex vestita</i>	Clothed sedge	G5	S1	E	B
<i>Calamagrostis cinnoides</i>	Small Reed-grass	G5	S3	SC	E

A-22

The Draft EIS accurately describes the location and description of the two natural communities, and *Carex vestita*. However, the draft EIS lacks mention of *Calamagrostis cinnoides* that is documented at the southwestern end of the airfield. Figure 2 depicts the location of all known rare and exemplary botanical features on BNAS lands.

PC007-5

Please note, Figure 3.12-1 titled Ecological Community Map broadly characterizes the vegetation types found on the BNAS property, but does not depict the natural community boundaries mapped by the Maine Natural Areas Program for environmental review purposes. Several of the areas characterized by the Navy's consultants are not accurately interpreted and displayed on Figure 3.12-1.

PC007-6

PC007-7

Field surveys were designed to collect enough information sufficient for the purpose of a NEPA impact assessment and were not intended to be a comprehensive inventory of the installation.

MNAP prior comments (November 17, 2008) state that survey work is incomplete for the BNAS site and that the Maine Natural Areas Program would be interested in conducting more detailed surveys of these features to further document their condition and the rare species they support. Unfortunately, the opportunity to conduct additional field investigations was not provided and there has been no additional consultation with MNAP staff regarding field visits conducted by consultants hired for the drafting of the EIS.

PC007-7

MNAP is welcome to conduct a more detailed comprehensive survey at the installation and should coordinate their visits with Kari Moore, NAVFAC PWD-ME Environmental and/or Lisa Joy, NAVFAC PWD-ME Environmental.

Initial MNAP comments concluded that conserving the natural community and rare plant occurrences summarized in the table above will contribute to the long term conservation of native wildlife in the increasingly developed mid-coast region, and will also provide good quality

PC007-8

PC007-8

Thank you for your comment.

open space for use by the greater Brunswick community. The Maine Natural Areas Program strongly recommended that these features be conserved when the base is closed.

PC007-8
Continued

3. Additional Unverified Botanical Features

The following botanical features noted in the draft EIS have not been documented or verified by the Maine Natural Areas Program.

PC007-9

Scientific Name	Common Name	Global Rarity Rank	State Rarity Rank	State Protection Status	Element Occurrence Rank
Pitch Pine-Heath Barren	Pitch Pine-Heath Barren	G3G5	S1	n/a	?
Carex siccata	Dry land sedge	G5	S1);	?

4. Detailed MDIFW Review of Draft EIS for the Disposal and Reuse of Brunswick Naval Air Station -

In conducting this review, we have organized our comments by section and page number.

Executive Summary ES.6 Biological Resources, Vegetation (page xiii):

Little Bluestem-Lowbush Blueberry Sandplain Grasslands are a critically imperiled type of grassland in Maine and occur at only a handful of sites statewide. In Maine, grasshopper sparrows nest exclusively in this type of grassland. This natural community type is rare throughout New England and its importance to several rare, threatened, and endangered plant and animal species should be emphasized throughout this document.

PC007-10

Executive Summary ES.6 Biological Resources, Threatened or Endangered Species (page xiv):

This section should be amended to identify that the 25 acres of critically imperiled sandplain grassland that may be permanently removed under Alternative 1 includes historic core grasshopper sparrow breeding areas representing a significant impact with consequences for species recovery at this site. Additionally this section should clarify that any party proposing development or other land disturbance in this district would also be required to consult with MDIF&W.

PC007-11

Executive Summary ES.6 Biological Resources, Significant Wildlife Habitat (page xiv):

This section does not address other Significant Wildlife Habitats on the base that are regulated under the state's Natural Resource Protection Act including mapped deer wintering areas, or wadingbird and waterfowl habitat. Each of which could potentially be impacted by identified alternatives. It should be noted in this section that any proposed development or other land disturbance within or adjacent to Significant Wildlife Habitats would require consultation with our department.

PC007-12

PC007-8 cont'd

Please see Sections 4.12.1.1 and 4.12.2.1 for a discussion on the areas conserved on the installation under Alternatives 1 and 2, respectively.

Any party proposing development or other land disturbances in areas not included in these conservation districts will be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

PC007-9

Sections 3.12.1; 4.12.1.1 and 4.12.2.1 of the EIS have been revised to include statements that MNAP has not verified the occurrence of the Pitch Pine-Heath Barren community and *Carex siccata*, respectively, at NAS Brunswick.

PC007-10

The Executive Summary, Section ES.6, under bolded heading "Biological Resources", has been revised to emphasize the importance of Sandplain Grassland habitat to several rare, threatened, and endangered species.

PC007-11

The Executive Summary, Section ES.6, under bolded heading "Biological Resources" and subheading, "Wildlife" and "Threatened and Endangered Species", has been revised to include additional discussion of potential impacts to grasshopper sparrow, and state consultation requirements for any future development in Sandplain Grassland habitat.

PC007-12

Text has been added to Executive Summary, Section ES.6, under bolded heading "Biological Resources" and subheading "Significant Wildlife Habitat" summarizing impacts to threatened and endangered species habitat, vernal pools, deer wintering area, and waterfowl and wading bird habitat.

A-23

Executive Summary ES.7 Summary of Potential Cumulative Impacts (page xv):

We do not concur that cumulative impacts to endangered grasshopper sparrow habitat are "either non-existent, offset due to geographic area, offset by the duration of the build-out, or reduced due to regulatory requirements or mitigation measures". A primary facility entrance road, rail spur, and professional office park have been proposed to directly conflict with core breeding areas of the state endangered grasshopper sparrow. The existing size of the critically imperiled sandplain grassland at the northern end of the runway is approaching the minimum acreage necessary to support multiple grasshopper sparrow territories. Further reduction of available habitat will significantly impact species recovery efforts.

PC007-13

The EIS has been revised to address MDIFW comments regarding potential direct and cumulative impacts to grasshopper sparrow habitat (see Sections ES.6 under bolded heading "Biological Resources", ES.7; 4.12.1.3; and 5.3.7).

Sandplain grasslands have been ranked as critically imperiled by the Maine Natural Areas Program specifically as a result of cumulative losses over time given their high developability being open areas dominated by well-drained sands. As a result only four viable grasshopper sparrow habitat areas are known to exist statewide. To date, planning efforts for Brunswick Naval Air Station re-use have not adequately considered alternative build-out plans that could avoid impacts to this critical habitat area and no assurances have been provided that sandplain grasslands will be managed in appropriately and remain as functional grasshopper sparrow habitat upon base disposal.

PC007-14

The EIS has been revised to address MDIFW comments regarding potential direct and cumulative impacts to grasshopper sparrow habitat (see Sections ES.6 under bolded heading "Biological Resources"; ES.7; 4.12.1.3; and 5.3.7).

Section 3 Existing Environment, 3.12 Biological Resources, 3.12.2 Wildlife (page 3-149):

The opening paragraph of this section should reference additional grassland bird survey work including collaborative efforts with MDIF&W dating from the early 1990's through 2003 and the Institute for Bird Populations 2005 report: *Status of Grasshopper Sparrow and Other Grassland-associated Bird Species at Naval Air Station Brunswick, Maine.*

PC007-15

Section 3.12.2 has been updated to include these surveys and collaborative efforts.

Section 3 Existing Environment, 3.12 Biological Resources, 3.12.2 Wildlife (page 3-150):

The EIS states, "no bald eagle nests are located near NAS Brunswick". A bald eagle nest site is in fact located less than 1/2 mile from the northern end of the runway on the south shore of the Androscoggin River. A second bald eagle nest site is located approximately 1/2 mile from the southeast corner of base property.

PC007-16

PC007-16

Under the bolded heading "Bald and Golden Eagle Protection Act" in Sections 3.12.3 and 4.12.1.3 of the EIS, text has been revised to include discussion of these bald eagle nests.

Section 3 Existing Environment, 3.12 Biological Resources, 3.12.2 Wildlife, Outlying Properties (page 3-151):

In the discussion of wildlife present at the East Brunswick Transmitter site it should be noted that the sandplain grassland is known to support one of only a few known state populations of the cobweb skipper (State Special Concern) and that at least 7 bird species ranked as State Special Concern breed at this site (eastern kingbird, brown thrasher, chestnut-sided warbler, prairie warbler, yellow warbler, eastern towhee, and eastern meadowlark)

PC007-17

PC007-17

Section 3.12.3 and Table 3.12-3 of the EIS have been revised to include discussion of these State Special Concern species.

Section 3 Existing Environment, 3.12 Biological Resources, 3.12.2.1 Important Bird Areas (page 3-152):

The EIS document identifies the Nelson's and saltmarsh sparrows as being "uncommon". This section should be revised to clarify that both species are listed as state special concern species.

PC007-18

PC007-18

Section 3.12.2.1 of the EIS has been revised to include the correct state designation of Nelson's and saltmarsh sharp-tailed sparrows.

A-24

Section 3 Existing Environment, 3.12 Biological Resources, 3.12.2.2 Bird-Airstrike Hazard (page 3-152):

The BASH plan was implemented without consultation with MDIF&W despite past collaboration in managing sandplain grasslands on the base for state endangered bird species. During the 2008 and 2009 breeding seasons, predatory birdcalls were broadcast within known grasshopper sparrow breeding areas. After consultation with the state Attorney General's office, (May 17, 2010), we have concluded that this activity may contribute to illegal Take or Harassment under the Maine Endangered Species Act. We look forward to working with future civilian airport managers to limit the risk of bird aircraft collisions while not unnecessarily harassing endangered species.

Section 3 Existing Environment, 3.12 Biological Resources, 3.12.3 Threatened and Endangered Species, State-Listed Threatened and Endangered Species (page 3-157):

The last paragraph of this section states that "no rare bird species were identified during grassland bird surveys completed at the East Brunswick Radio Transmitter Site...". MDIF&W considers species ranked as Special Concern as being "rare", at least 7 special concern species breed at this location, 6 of which were identified by Ecology and Environment contractors during survey efforts. Furthermore, this section states, "no grassland bird species were identified on the property". MDIF&W considers eastern meadowlark to be an obligate grassland species.

Section 3 Existing Environment, 3.12 Biological Resources, 3.12.3 Threatened and Endangered Species, State-Listed Species of Special Concern (page 3-157):

We recommend that this section be revised using an updated list of special concern species. Many of the species identified by Ecology and Environment during contracted survey efforts are in fact species of special concern and should be reported consistently. Additionally it should be noted that MDIF&W has not been contacted to date to provide a comprehensive survey of base lands. It is likely that other species of special concern are present.

Section 3 Existing Environment, 3.12 Biological Resources, 3.12.4 Significant Wildlife Habitat, Figure 3.12-2:

This figure does not include a known eagle nest on the Androscoggin immediately northeast of the runway end, nor does it include two known Significant Vernal Pools, habitat protected under the Natural Resources Protection Act, and mapped in the southeast portion of the base in 2007.

Section 4 Environmental Consequences:

Please note we have only provided specific comments regarding Alternative 1 "preferred alternative" analysis. Many of these comments however are also applicable to narratives provided for the other alternatives.

Section 4 Environmental Consequences, 4.12 Biological Resources, 4.12.1 Vegetation, page 4-184:

The first paragraph on this page states that the Pitch-Pine Heath Barren Natural Community type is "rare". It should be clarified that this type is critically imperiled in the State of Maine and the

PC007-19

PC007-19

During base operations, the Navy implemented an adaptive BASH management program to control wildlife populations around the airfield, thereby reducing the risks of bird/animal strikes with aircraft. Following transfer of the installation, it is expected that the airfield operator will consult with MDIFW prior to any habitat management and/or wildlife control activities that take place in Sandplain Grassland habitat around the airfield. No change in the EIS required.

PC007-20

PC007-20

Section 3.12.3 and Table 3.12-3 of the EIS have been revised to include discussion of rare and grassland bird species at the East Brunswick Radio Transmitter Site.

PC007-21

PC007-21

Section 3.12.3 of the EIS has been revised based on the updated list of special concern species published by MDIFW.

PC007-22

PC007-22

Section 3.12.3, under bolded heading of "Bald and Golden Eagle Protection Act" and Section 3.12.4, under bolded heading of "Vernal Pools", of the EIS have been revised to include the locations of the bald eagle nest and vernal pools.

PC007-23

PC007-23

Changes to address MDIFW and MNAP comments were made throughout the document for Alternative 1 and Alternative 2, where applicable.

PC007-24

PC007-24

Under the bolded heading of "NAS Brunswick", Sections 4.12.1.1 and 4.12.2.1 of the EIS have been updated to clarify that

A-25

Maine Natural Areas Program should be consulted prior to any activities that could result in disturbance to this community type. Additionally, due to known occurrences of rare pitch pine dependent butterfly and moth species within close proximity to base lands, MDIF&W should also be consulted prior to any activities that could result in losses of this critical habitat type.

PC007-24
Continued

PC007-24 cont'd

the Pitch-Pine Heath Barren Community is critically imperiled, and that MNAP and MDIFW should be consulted regarding disturbances to this critically imperiled community.

Section 4 Environmental Consequences, 4.12 Biological Resources, 4.12.1 Vegetation, page 4-185:

PC007-25

PC007-25

As stated above, both MNAP and MDIF&W should be consulted prior to any proposed impacts to the Little Bluestem-Blueberry Sandplain Grassland at the East Brunswick Radio Transmitter Site. Not only is this area a critically imperiled natural community type, it is also known to support several special concern species. As is the case on the main base, this 66-acre site has not been surveyed comprehensively and could host additional state-listed bird, reptile, and invertebrate species. We strongly recommend that the future holder of this property work closely with both resource departments to design future management approaches capable of protecting and enhancing habitat conditions.

As stated in the EIS (see Figures 4.1-2 and 4.1-7 for Alternatives 1 and 2, respectively), the East Brunswick Radio Transmitter Site is designated an open space/recreation/natural area land use district. Any party proposing development or other land disturbance in districts containing Sandplain Grassland habitat would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

Section 4 Environmental Consequences, 4.12 Biological Resources, 4.12.1.2 Wildlife, page 4-186:

PC007-26

PC007-26

The assumptions included in the third paragraph of this section that downplay impacts of habitat loss by arguing that birds and other taxa will simply "move on to other habitat" are misleading. For this to be the case, other habitat areas would need to be proximate, of equal quality, and unoccupied. Loss of a maximum of 1,146 undeveloped acres will result in direct population losses of many species. We are especially concerned with proposed impacts to already rare habitat types of which incremental losses result in significant cumulative impacts.

Section 4.12.1.2 of the EIS has been revised to address potential direct population losses of wildlife species from removal of habitat.

Section 4 Environmental Consequences, 4.12 Biological Resources, 4.12.1.2 Wildlife, Important Bird Areas, page 4-187:

PC007-27

PC007-27

We strongly recommend that the future civilian airport manager coordinate airfield apron maintenance techniques with MDIF&W in order to enhance grassland bird habitat and best protect the values of the designated Important Bird Area (IBA). Without proper management, significant grassland bird habitat losses should be assumed in this analysis.

The Navy concurs with MDIFW that future civilian airport operators should coordinate with MDIFW for conservation of state-listed grassland species.

Section 4 Environmental Consequences, 4.12 Biological Resources, 4.12.1.2 Wildlife, Bird-Aircraft Strike Hazard, page 4-188:

PC007-28

PC007-28

MDIF&W should be a partner in establishing future Wildlife hazard Management Plans at the civilian airport. We were not included in DoD BASH program planning during the past several years and feel that significant impacts to state endangered species resulted.

The Navy concurs with MDIFW that future civilian airport operators should coordinate with MDIFW when developing and implementing Wildlife Hazard Management Plans.

Section 4 Environmental Consequences, 4.12 Biological Resources, 4.12.1.3 Threatened and Endangered Species, Bald and Golden Eagle Protection Act, page 4-193:

PC007-29

PC007-29

This section should note the presence of a bald eagle nest on the Androscoggin River immediately north of the runways.

Information regarding the nest on the Androscoggin River was added to Section 4.12.1.3 under bolded heading "Bald and Golden Eagle Protection Act".

A-26

Section 4 Environmental Consequences, 4.12 Biological Resources, 4.12.1.4 Significant Wildlife Habitat, Vernal Pools, page 4-194:

It should be clarified in this section that both NRPA and MDEP Site Location Law have specific standards regarding the protection of Significant Vernal Pool habitats, potentially up to 500 ft from the edge of the pool depression. Additionally, the US Army Corps of Engineers regulates certain vernal pool habitats, potentially up to 750 ft from the edge of the pool depression. MDIF&W and USACOE should be consulted prior to planning any activities that could impact significant pools and their buffers.

Section 5 Cumulative Impacts

The purpose of this section is to assess incremental impacts of the proposed action in light of other past, present, or reasonably foreseeable actions. Past incremental impacts to glacial outwash sand dependent natural communities throughout southern Maine and the New England region have resulted in many of these communities being ranked as critically imperiled and many of their characteristic plant and animal species being listed as threatened and endangered. *The History of Brunswick, Topsham, and Harpswell, Maine, Including the Ancient Territory Known as Pejepscot* (Wheeler and Wheeler 1878) describes vast plains of pitch pine extending through the central portions of Brunswick. In the early 20th century much of the pitch pine in the Cook's Corner area of Brunswick was cut for matchstick production. What remained has gradually been replaced by residential and commercial development. Today, only small pockets of pitch pine dominated stands remain including examples on NASB lands and in what is left in the Brunswick Town Commons. Similarly, Little Bluestem-Blueberry Sandplain Grasslands have been reduced to remnant pockets from what was historically present when the town commons and civilian airstrip occupied what is now NASB.

In recent years, construction of the new hangar and control tower has impacted remaining sandplain grasslands and pitch pine communities. Additionally, recent changes in management of runway apron areas and discontinuance of controlled burns has lead to changes in plant community structure and degraded some biological values of both community types. Further losses of either the Pitch Pine Heath Barren or Little Bluestem-Blueberry Sandplain Grassland need to be considered as potentially significant impacts based on cumulative losses to both community types in the past and extremely limited habitat availability for the state listed rare, threatened, and endangered species that depend on these specific habitat types.

We do not agree with the EIS finding that: "it is unlikely that there would be cumulative impacts on state-listed threatened and endangered species that inhabit grasslands" (page 5-26). The proposed office park zone, rail spur, and Bath Road access will directly impact known grasshopper sparrow breeding sites. Further reduction in the quantity and quality of sandplain grassland habitat at NASB has the real potential for permanently displacing this species from one of only 4 known breeding areas in the state. The direct loss of habitat, increased vehicular traffic and other development-associated disturbances (lights, noise, invasive species, etc.) that will potentially result from this proposal are significant cumulative impacts to state-listed endangered species. We recommend that the reuse plan be revised to include an office park and related infrastructure development window that adequately considers less damaging alternatives available on the 3,200 acre base property.

PC007-30

PC007-30

Under the bolded heading of "Vernal Pools", Sections 4.12.1.4 and 4.12.2.4 of the EIS have been updated to include additional information on vernal pool protection standards.

PC007-31

Section 5.3.7.2 - Biological Resources, Cumulative Impact Analysis, of the EIS was updated to indicate that impacts to these habitats from future development could have significant cumulative impacts.

In addition, text in the EIS was updated throughout Sections 4.12.1 and 4.12.2 to further define the potential impacts to these habitats.

PC007-32

Section 5.3.7 under bolded heading of "Vegetation" of the EIS was revised to include discussion of potentially significant cumulative impacts to grasshopper sparrows.

As stated in other comment responses, the Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts approved in the Reuse Master Plan.

As further stated in Section 5.3.7 under bolded heading of "Vegetation", any party proposing development or other land disturbance in districts containing Sandplain Grassland habitat would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

PC007-31

PC007-32

A-27

Section 6 Other Considerations, 6.2 Unavoidable Adverse Environmental Effects and Considerations that Offset Adverse Effects, Biological Resources, page 6-7:

This section suggests that the ecological impacts associated with the potential development 1,146 acres of undeveloped land including up to 90 acres of Little Bluestem-blueberry Sandplain Grassland and several acres of Pitch Pine Heath Barren (both community types supporting state-listed rare, threatened, and endangered species) can be offset by "preserving" 1,060 acres. Yet no comparison of acreage type, quality, or future habitat management approach to maintain habitat integrity is offered. We feel that impacts to rare community types and rare species habitat can be further avoided through minor design modifications as discussed above. A future analysis of truly unavoidable impacts would need to provide a description of acreage by type proposed to offset impacts and how that acreage will be managed to provide long-term biological values necessary to offset adverse impacts to rare natural communities and rare species habitat. Furthermore, such proposed compensation acreage would likely be required to mitigate at a ratio considerably higher than the level of acreage impacted.

5. Detailed MNAP Review of Draft EIS for the Disposal and Reuse of Brunswick Naval Air Station

In conducting this review, we noted in the attached table, ecological context and associated ecological impacts of the three proposed Alternatives.

We assume that under Alternatives 1 and 2 specific redevelopment projects would fall under state and federal permitting requirements and MNAP would therefore have the opportunity to conduct site visits associated with permitted projects and comment on any proposed impacts to rare and exemplary botanical features. Please note that the removal of the Sandplain Grassland natural community, ranked as critically imperiled due to extreme rarity, from any proposed development zone will minimize future consultation during the permitting process and help to streamline redevelopment projects.

Alternative 1 - BNAS

MNAP Feature	Ecological Context	Recommendation
Sandplain Grassland Natural Community	Under Alternative 1 the MNAP mapped Sandplain Grassland natural community would intersect with three different land use districts: Airport Operations, Natural Areas and Education/Natural Areas. It appears that the Sandplain Grassland natural community in the Airport Operations Area is primarily within the buffer of the existing infrastructure, which under current management benefits the Sandplain Grassland natural community.	Continued operations of the airport runway and appropriate management of the runway apron that maintains the natural composition of the natural community should not pose a conflict. We recommend a more restrictive definition of allowed uses for this area that prohibits built structures that are intended to be permanent and any activities that alter the habitat, other than for the management of the existing Sandplain Grassland natural community. Approximately 65 acres of Sandplain Grassland natural community in the Education/Natural Areas district could be converted to academic space and administrative and support facilities. This represents over 31% of the Sandplain Grassland

PC007-33

PC007-33

Paragraph was stating the acreage potentially affected and the acreage that would remain in its natural state under Alternative 1 and Alternative 2; it was not meant to imply the losses could be offset by maintaining areas in their natural state.

Text was changed in Section 6 .2 under bold heading "Biological Resources" and subheading "Vegetation" to read: "1,060 acres would remain in its natural state" rather than "would be preserved". In addition, impacts to the critically imperiled Sandplain Grassland habitat and state-listed endangered grasshopper sparrow were reiterated.

PC007-34

As stated in other comment responses, the Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts approved in the Reuse Master Plan.

As stated in Section 4.12.1.3 ("State-listed Threatened and Endangered Species") and elsewhere in the EIS, any party proposing development or other land disturbance in districts containing Sandplain Grassland habitat would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

PC007-34

PC007-35

PC007-35

- a) Best management practices for airfield management are consistent with grassland bird habitat management; however, the Navy cannot dictate how the future airfield would be maintained. Airfield operator would be expected to comply with applicable local, state and federal regulations for airfield management.
- b) The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts or allowed uses within the districts approved in the Reuse Master Plan.

A-28

c) The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts or allowed uses within the districts approved in the Reuse Master Plan.

d) For the purposes of this EIS, vegetation communities on NAS Brunswick and its outlying properties have been classified in accordance with the *Natural Landscapes of Maine* (Gawler and Cutko 2004). The communities were identified based on a review of existing data and current aerial photography and a reconnaissance-level field survey. A detailed description of the ecological communities at NAS Brunswick is presented in the *Ecological Communities and Wetland Resources Report* (Appendix F). Results of the report are summarized in Section 3.12.1.

The ecological communities mapped in the EIS are intended for planning purposes, any party proposing development or other land disturbance in these districts will be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

A-30

PC007-35
Continued

		<p>natural community at BNAS is mapped by the Maine Natural Areas Program. The portion of the Sandplain Grassland natural community that falls within the Education/Natural Areas Land Use should be removed and included in a more restrictive designation prohibiting built structures and alteration of habitat.</p> <p>The Professional Office land use designation abuts the MNAP mapped Sandplain Grassland natural community, but according to figure 3.12-1, appears to intersect with the Sandplain Grassland natural community as mapped by Navy consultants. A site visit by the Maine Natural Areas Program would be required to determine the extent to which this area should be mapped as a Sandplain Grassland natural community. If it is determined that the Sandplain Grassland natural community does occur in this area, the areas currently proposed as a Bath Road access and Professional Office land use district should also be included in a more restrictive district prohibiting built structures and alteration of habitat.</p>
Salthay Saltmarsh Natural Community	<p>The majority of the salt marsh along Mere Brook is well buffered by maturing forest and provides excellent habitat for wading birds and other animal species that depend on tidal marshes for all or some part of their life cycles. In current times, there are few if any opportunities in Maine to preserve an entire tidal marsh system at once as can be done with the Mere Brook Marsh as part of the base closure process. The Salthay Saltmarsh natural community on BNAS lands falls within a Natural Areas land use designation.</p>	<p>The existing forested buffer should be maintained to ensure protection of the community.</p>
Rare plants <i>Carex vestita</i> and <i>Calamagrostis cinnoides</i>	<p>These rare plants are associated with the Sandplain Grassland natural community.</p>	<p>If adopted, our recommendation to limit activities within the Sandplain Grassland natural community will provide adequate protection for these species.</p>

PC007-36

Under Alternative 1, the saltmarsh community and associated forested buffers along Harpswell Cove would be preserved within the Natural Areas district. The Mere Brook area is within the Natural Areas, Education/Natural Areas, and Open Space/Recreation districts. Some development would occur within the Education Area but would avoid impacts to Mere Brook to the extent possible. Planned recreational facilities would likely avoid direct impacts to Mere Brook. Once plans are prepared, the developer would be required to consult with state agencies to obtain any required permits.

PC007-37

Calamagrostis cinnoides, a state species of special concern, has been documented in the red maple-sensitive fern swamp southwest of the runway. Under Alternative 1, individuals of this species could be impacted as it occurs within the proposed Aviation-related Business district. Any party proposing development or other land disturbance in the red maple-sensitive fern swamp would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

Carex vestita could be impacted under Alternative 1. Best management practices for airfield management are consistent with grassland habitat management; however, the Navy cannot dictate how the future airfield would be maintained. Airfield operator would be expected to comply with applicable local, state and federal regulations for airfield management.

PC007-36

PC007-37

PC007-38

The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts approved in the Reuse Master Plan. However, the Navy understands the desire to protect this significant habitat.

PC007-38

Alternative 1 - East Brunswick Transmitter Site

MNAP Feature	Ecological Context	Recommendation
Sandplain Grassland Natural Community	As proposed under Alternative 1, the East Brunswick Radio Transmitter Site would be designated as a mix of Recreation &	Maine Natural Areas Program has mapped this entire site as a Sandplain Grassland natural community and we would strongly recommend a more restrictive Natural Areas land use

As stated in the EIS (see Figures 4.1-2 and 4.1-7), the East Brunswick Radio Transmitter Site is designated an Open Space/Recreation/Natural Area land use district. Any party proposing development or other land disturbance in districts containing Sandplain Grassland habitat would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

PC007-38
Continued

	Open Space and Natural Areas districts which would allow both active and passive recreation to include golf courses, public gardens, public parks, sports fields, bicycle trails, pedestrian trails, nature centers and other non-intrusive, passive outdoor recreation.	designation that prohibits built structures and alteration of habitat.
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PC007-39

As stated in the EIS (see Section 2.3.2), Alternative 2 proposes a high-density scenario. The Sandplain Grassland natural community is primarily located within the Natural Areas, Education, and Business and Technology Industries land use districts.

Alternative 2 - BNAS

PC007-39

MNAP Feature	Ecological Context	Recommendation
Sandplain Grassland Natural Community	Alternative 2 converts the air strip area to a mix of land use designations.	The Sandplain Grassland natural community would fall primarily into Natural Areas, Education and potentially Business and Technology Industries designations. As previously stated, we would strongly recommend a more restrictive Natural Areas land use designation that prohibits built structures and alteration of habitat.
Salthay Saltmarsh Natural Community	The land use designation for these features under Alternative 1 and Alternative 2 are the same. Please see comments under Alternative 1.	The land use designation for these features under Alternative 1 and Alternative 2 are the same. Please see comments under Alternative 1.
Rare Plants <i>Carex vestita</i> and <i>Calamagrostis cinnoides</i>	The land use designation for these features under Alternative 1 and Alternative 2 are the same. Please see comments under Alternative 1.	The land use designation for these features under Alternative 1 and Alternative 2 are the same. Please see comments under Alternative 1.

PC007-40

PC007-40

The Navy understands the desire to protect this significant habitat. Any party proposing development or other land disturbance in these districts will be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

Under Alternative 2, the saltmarsh community and associated forested buffers along Harpswell Cove would be preserved within the Natural Areas district. The Mere Brook area is within the Natural Areas and Education districts. Some development would occur within the Education Area but would avoid impacts to Mere Brook to the extent possible. Once plans are prepared, the developer would be required to consult with state agencies to obtain any required permits.

PC007-41

PC007-41

Calamagrostis cinnoides, a state species of special concern, has been documented in the red maple-sensitive fern swamp southwest of the runway. Individuals could also be impacted under Alternative 2, as the species occurs within the proposed Residential district. Although this species is not protected by law, it could be protected as part of wetland permitting requirements. Any party proposing development or other land disturbance in these districts will be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

Carex vestita could be impacted under Alternative 2. The

A-32

Alternative 2 - East Brunswick Transmitter Site

PC007-42

MNAP Feature	Ecological Context	Recommendation
Sandplain Grassland Natural Community	The land use designation for these features under Alternative 1 and Alternative 2 are the same. Please see comments under Alternative 1.	The land use designation for these features under Alternative 1 and Alternative 2 are the same. Please see comments under Alternative 1.

Navy understands the desire to protect this significant habitat. Text has been added to EIS stating "any party proposing development or other land disturbance in these districts will be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances."

PC007-42

The Navy understands the desire to protect this significant habitat.

As stated in the EIS (see Figures 4.1-2 and 4.1-7), the East Brunswick Radio Transmitter Site is designated an Open Space/Recreation/Natural Area land use district. Any party proposing development or other land disturbance in districts containing Sandplain Grassland habitat would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

No-Action Alternative

Under this alternative it is assumed that eventually the Navy would abandon management of the air strip at BNAS and the East Brunswick Transmitter Site.

MNAP Feature	Ecological Context	Recommendation
Sandplain Grassland Natural Community	The Sandplain Grassland natural community has benefitted from the current management at these sites. Under a complete abandonment scenario it is likely that the Sandplain Grassland would revert to a scrub-shrub vegetative condition.	To maintain the Sandplain Grassland natural community long-term management would be needed.
Salthay Saltmarsh Natural Community	An abandonment scenario would likely benefit the saltmarsh mapped at BNAS.	No recommendation.
Rare plants <i>Carex vestita</i> and <i>Calamagrostis cinnoides</i>	The rare plants are associated with the Sandplain Grassland natural community. If management of the airport runway was abandoned, the available habitat for these plants would likely diminish.	To maintain the Sandplain Grassland natural community long-term management would be needed.

PC007-43

PC007-44

PC007-45

A-34

PC007-43

Under the No-Action Alternative, the grassland surrounding the airfield would not be maintained as part of the BASH program. However, the grounds around the airfield would be maintained according to the guidelines in *The Department of the Navy Base Realignment and Closure Implementation Guidance* (DoN 2007). According to these guidelines, the area around the airfield should "be maintained to the minimum extent necessary to protect against fire and erosion, and to assure proper forest and wildlife management where applicable." The guidelines require that the grass around the airfield be mowed at least once annually to a height no shorter than 8 inches and no longer than 12 inches. Mowing will not be conducted between May 1 and August 15 to protect nesting birds. This language was added to Section 4.12.3.1 of the EIS.

PC007-44

Thank you for your comment.

PC007-45

Calamagrostis cinnoides, a state species of special concern, has been documented in the red maple-sensitive fern swamp southwest of the runway. Under Alternative 1, individuals of this species could be impacted as it occurs within the proposed Aviation-related Business district. Individuals could also be impacted under Alternative 2, as the species occurs within the proposed Residential district. Any party proposing development or other land disturbance in these districts will be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

Carex vestita could be impacted under Alternative 2. The Navy understands the desire to protect this significant habitat. Text added to EIS stating "any party proposing development or other land disturbance in these districts will be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances."

Under the No-Action Alternative *Carex vestita* would be maintained through annual mowing of the grassland surrounding the airfield according to *The Department of the Navy Base Realignment and Closure Implementation*

Guidance (DoN 2007). Information regarding mowing under the No-Action Alternative was added to Section 4.12.3.1.

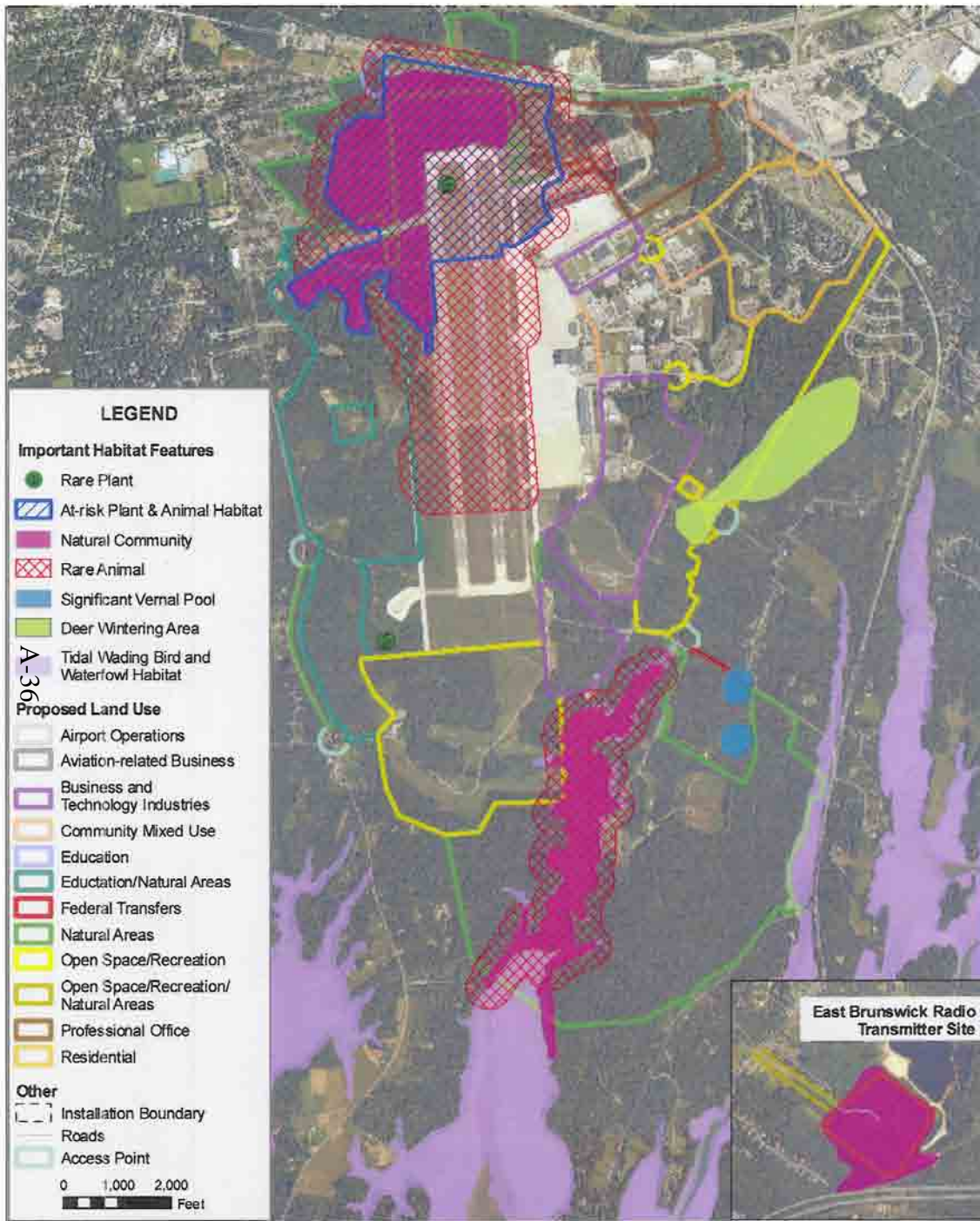


Figure 1 - Alternative 1 with At-risk Plant and Animal Habitat
NAS Brunswick, Maine



A-37

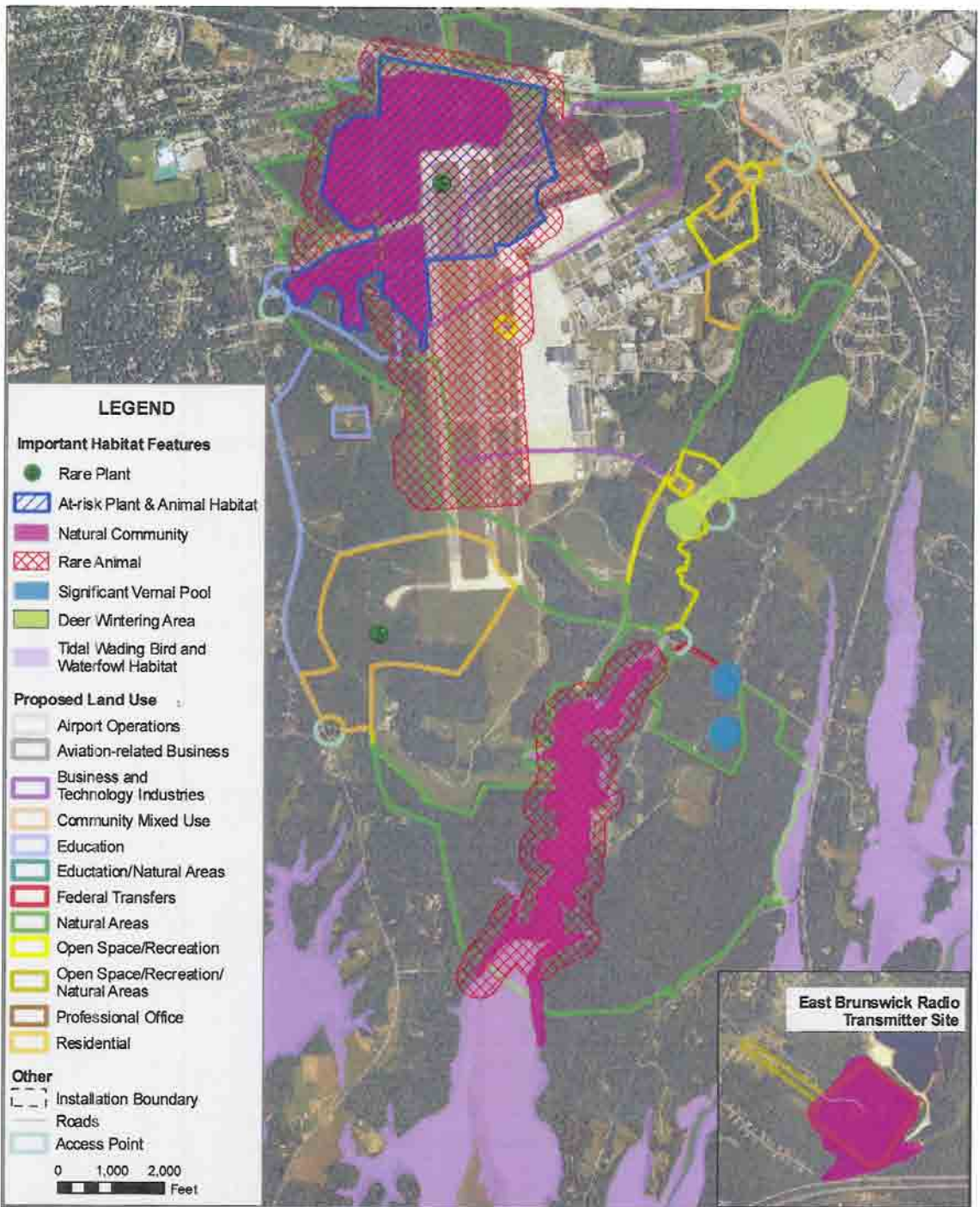


Figure 2 - Alternative 2 with At-risk Plant and Animal Habitat
NAS Brunswick, Maine





Town of Brunswick, Maine

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GARY L. BROWN, MANAGER

PC008

June 28, 2010

Department of the Navy
BRAC Program Management Office Northeast
Director, David Drozd
4911 Broad Street
Philadelphia, PA 19112

Dear David,

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Disposal and Reuse of Naval Air Station Brunswick, Maine, May 2010. The EIS evaluated two property disposal and build alternatives – Alternative 1 and Alternative 2; and the No-Action Alternative. Alternative 1 is consistent with the Reuse Master Plan, identified as the preferred alternative by the Navy and is the preferred alternative for the Town of Brunswick. Therefore, all comments, concerns, feedback as stated within this letter address Alternative 1.

The Town of Brunswick's comments from the Departments of Administration, Planning and Development, Public Works and Parks and Recreation, along with the Conservation Commission are based on two years of analysis, review and site visits to BNAS prior to the conveyance process. We offer the following comments:

1. Section 4.1.1.1, Land Use and Zoning:
 - a. Since the drafting of this subsection of the DEIS, the BNAS Zoning Districts (BNAS Reuse District w/related land use areas, College Use/Town Conservation (CU/TC) District, and the BNAS Conservation District) were adopted by Town Council and incorporated into the Town of Brunswick Zoning Ordinance on July 20, 2009, thereby replacing the former I-5 Zoning District. All FEIS references to existing zoning districts should so reflect the amendment.
 - b. Figure 4.1-4, Approved Public Benefit Conveyances, Identifier C should reference the shared public benefit conveyance of 226+/- acres for education and conservation uses. Identifier M proposed property use should include recreation as well as conservation.
 - c. With regard to Aviation Land Use Planning, it is assumed that the Town of Brunswick will amend the Zoning Ordinance and Map to reflect FAA changes to the existing Flight Path Overlay Zone.
 - d. Section 4.1.1.1. Draft EIS (DEIS). Page 4-14/17, Approved Public Benefit Conveyance (PBC), general references are made regarding proposed PBC development not to be expected to significantly impact land use and zoning. Section should address more specifically, the impact of intensive, large scale tourism

PC008-1

PC008-2

PC008-3

PC008-4

PC008-1

The text in the EIS has been updated in Section 3.1.2 and Section 4.1.1.1 to reflect the new Town of Brunswick Zoning Ordinance from July 20, 2009. A global search was also completed for all Town of Brunswick Zoning Ordinance references and the data were verified to be in the most recent amendment of the zoning ordinance.

PC008-2

Figure 4.1-4 has been updated to incorporate the comments. Identifier B and C were updated to reflect the Conservation and Education aspect of the PBC. Identifier M was updated to include recreation uses as well as conservation.

PC008-3

Text in Section 4.1.1.1 under the bolded heading "Aviation Land Use Planning", bolded point number 2, has been updated to reflect the assumption that the Town will amend the existing Flight Path Overlay Zone. This letter from the town encompassing DEIS comments was used as a reference to this assumption.

PC008-4

The EIS analyzes land use districts as outlined in the adopted Reuse Plan with no specific development plans. Text has been added to the "Approved Public Benefit Conveyances" discussion and throughout Sections 4.1.1.1; 4.1.1.2; 4.1.2.1; and 4.1.2.2 to indicate the potential for tourism.

A-38

A-39

<p>destination use in the recreation and open space land use district, such as with the proposed Brunswick Parks and Gardens.</p>	<p>PC008-4 Continued</p>	
<p>2. Section 4.2.1.1, Population: As stated in the first paragraph of "Employment Projections Based upon Alternative 1" it is unclear as to whether the referenced Renski and Reilly study did or did not analyze redevelopment of the installation. Please clarify in FEIS.</p>	<p>PC008-5</p>	<p>PC008-5</p>
<p>3. Section 4.4.1, Methodology: Assumptions do not consider the long-term implementation measures stated within the Town-accepted Gateway 1 Corridor Final Plan. The FEIS should consider those implementation measures specific to EIS study area; including but not limited to a passenger rail station located within the BNAS Reuse District, in terms of future traffic volumes.</p>	<p>PC008-6</p>	<p>Text in the EIS in Section 4.2.1.3 under bolded heading "Employment Projections Based Upon Alternative 1", has been updated to clarify that the Renski and Reilly study did not analyze the redevelopment of the installation.</p>
<p>4. Section 4.4.2.5, Pedestrian and Alternative Transportation Amenities a. Since the drafting of this subsection, the Brunswick Explorer, a fixed-route public transit bus service will launch service Fall 2010.</p>	<p>PC008-7</p>	<p>PC008-6</p>
<p>b. Per adopted Town policy set forth in the 2008 Comprehensive Plan, pedestrian and bicycle amenities are required for any new/redeveloped areas and should be noted as a "shall" provision, not "could" be provided (p. 4-82</p>	<p>PC008-8</p>	<p>The Gateway 1 Corridor Study has been added to the EIS in</p>
<p>5. Section 4.11.1. DEIS indicates storm water management will be required, but does not specify whether on a site-by-site basis or for entire reuse area. Mitigation options should include a storm water watershed management plan for entire reuse area, rather than a site-by-site management approach. Due to the presence of an Urban Impaired Stream Watershed, final EIS (FEIS) should be revised to indicate this approach will be included.</p>	<p>PC008-9</p>	<p>Section 3.1.2. The Gateway 1 study area shows a direct connection between the site and Route 1. A direct connector from the site to Route 1 was presented in the Reuse Master Plan and in the Traffic Impact Study.</p>
<p>6. Sections 4.12.1 and 5.3.7. DEIS contains inconsistent references with sections stating developing party "may be required to consult with MDIFW and MNAP", and other sections, states that the developing party "would be required to consult." For consistency, FEIS should indicate that consultation "would" be required.</p>	<p>PC008-10</p>	<p>Amtrak service will begin within five years and access the Maine Street Station development in downtown Brunswick, which has the potential to influence traffic in the area. There will be two trains per day at the Maine Street Station, and based on the Traffic Impact Study, there will be little impact on</p>
<p>7. Section 4.12.1. Alternative 1, DEIS indicates up to 25 acres of Little Bluestem-Blueberry Sandplain Grassland community may be replaced, and approximately 5 acres of critically imperiled Pitch Pine-Heath Barren community may be impacted. DEIS indicates (on page 4-185) impacts on this natural community are minimized by establishment of the 1,060 natural areas district. We agree establishment of this district significantly minimizes potential impact. However, this is a rare natural community; FEIS should provide more detail about how impacts on this resource will be minimized or mitigated.</p>	<p>PC008-11</p>	<p>commuter volumes as the Amtrak is an intercity and not a commuter train.</p>
<p>8. Section 4.12.1. DEIS describes potential negative environmental consequences associated with the golf course. FEIS should include minimization or mitigation measures that will be implemented to reduce consequences. FEIS should indicate best management practices for storm water management, nutrient and pesticide management practices. In addition, the potential golf course location has been previously identified as a wildlife habitat travel corridor and an abrupt thrust also runs the length of this area, extending from Merrymeeting Bay to Gun Point in Harpswell. Groundwater seeps over shallow and frequently exposed bedrock and boulders along the fault and contributes to enriched soil conditions that result in plant species diversity not found in other areas of town, including Oak Fern, Long Beech Fern, Dwarf Scouring Rush, Ironwood and Northern White Cedar. Mountain Honeysuckle, listed as state-endangered, is also known from this area. FEIS should indicate that design and construction of the golf course, and other associated infrastructure in this area should</p>	<p>PC008-12</p>	<p>PC008-7</p> <p>Text in the EIS in Sections 3.4.5 and under bolded bullet "On-Site Transit Service" in Sections 4.4.2.5 and 4.4.3.5 has been updated to reflect this new public transit bus service.</p> <p>PC008-8</p> <p>Text in the EIS has been updated under the bolded bullet of "Provision of Bicycling Amenities" in Sections 4.4.2.5 (Alternative 1) and 4.4.3.5 (Alternative 2) to reflect this comment, using "should" instead of "could" in reference to pedestrian and bicycle amenities and the Town Comprehensive Plan.</p>

PC008-9

Text was added to Section 4.8.1.3 that any party proposing development of the property will be required to implement storm water management practices in accordance with local and state regulations. In addition, text was added that the town of Brunswick would encourage any party proposing development to prepare a storm water watershed management plan. Text was added to Sections 4.8.1.3 and 4.8.2.3 to identify the mitigation requirements for development within the watersheds of designated Urban Impaired Streams.

PC008-10

Text in the EIS in Sections 4.12.1 and 5.3.7 has been updated to reflect this comment, using "would" instead of "may" wherever the change is applicable.

PC008-11

The Navy will not have jurisdiction over how the natural communities within the 1,060 acre proposed natural area district will be managed following transfer of the property. The following text was added to Section 4.12.1.1: "Future land owners would be expected to comply with applicable local, state, and federal regulations and should consult with the MNAP and MDIFW regarding appropriate management of these natural communities, especially as it applies to threatened and endangered species."

PC008-12

Under bolded heading of NAS Brunswick, Section 4.12.1.2 has been updated with specific mitigation techniques for the golf course to reduce storm water impacts to Picnic Pond and its tributaries. Best Management Practices specific to the development of the golf course under Alternative 1 are outlined in Section 4.12.1.2.

In the Deer Wintering Areas subsection of 4.12.1.4, it already stated that the wildlife habitat would be avoided to the maximum extent practicable, but the language has now been

strengthened. The developer will be required to comply with Maine NRPA and applicable storm water regulations.

The source data for plant species utilized in this EIS were from MNAP. These species were not in the data sets provided by MNAP.

MDIFW and MNAP were the primary sources for T&E species information. The presence of the state-endangered Mountain Honeysuckle was not included in the data layers provided.

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- avoid and minimize impacts upon these resources, and provide description of these measures.
- 9. Section 4.12.1. DEIS indicates limited presence of grasshopper sparrows and upland sandpipers but bases this report on two days of breeding bird surveys conducted very early in the breeding season. Rather than indicating that this species may have been extirpated, FEIS should indicate that additional surveys would be appropriate.
 - 10. Section 4.12.1.4. The DEIS indicates results of vernal pool surveys have not been reviewed by MDIFW. FEIS should incorporate results of MDIFW review of these surveys.
 - 11. Section 4.12.1.4. In section on state-listed threatened and endangered habitat, DEIS describes impacts on grasslands but neglects to describe impacts on Pitch Pine Heath Barren. FEIS should include this description.
 - 12. Section 4.12.1.4 and Section 5.3.7. Page 4-193 DEIS indicates that 34 vernal pools and 15 significant pools are located within the development district, a discrepancy with page 5.27 where 16 are located within the development district and remaining 12 located in the natural area district and DEIS describes 46 vernal pools and 28 significant vernal pools. FEIS should be revised to provide location of other 18 pools, and to indicate what buffers will be incorporated for significant vernal pools.
 - 13. Section 4.4.1. Methodology
 - a. The DEIS assumes the new US Route 1 Connector will be installed and in use by 2016, which is optimistic. FEIS needs to also consider traffic impacts should that connector construction be delayed.
 - b. The EIS assumes the widening of Bath Road between Gurnet Road and Old Bath Road will be done soon. Gorrill-Palmer is the town design consultant; this project is under construction and should be finished by August 2010. However, final design by Gorrill-Palmer only provides one lane for through traffic in east bound direction. FEIS should address this change for impacts that were considered based on the incorrect assumption.
 - c. Town of Brunswick recently changed (September 2007) the number of lanes for north bound traffic on Gurnet Road (Route 24) from Forrestal Drive to Bath Road from two through lanes to one through lane. We question if the consultant considered new traffic pattern when doing traffic impact analysis for this section of Gurnet Road. Noted on Section, 4.4.2.2, page 4-75, EIS indicates that Gurnet Road between Bath Road and Forrestal Drive will see the "largest growth in traffic volume"; we need assurances that the revised lane reduction has been considered.
 - 14. Table 4.4-2, Coombs Road and Purinton Road are proposed for new access points to BNAS site. These are very minor local rural roads (20 foot or less paved width) and may not be able to accommodate additional traffic as projected under Alternative 1 (page 4-71, AP-5). Allowing access to developments on former BNAS site via Coombs and Purinton Road will have a major impact on rural residential character of these roads; these roads are not designed for such traffic. We question whether this has been considered and if there are other options to minimize access to these town ways. FEIS should examine / analyze the adequacy of the limited capacity intersection of Purinton Road and Coombs Roads.
 - 15. Table 4.4-6, I-9, Bath Road and Maine Street Rotary was not analyzed per Footnote 2 which mistakenly is indicated for I-6 (page 4-76). Maine DOT now has a plan for this intersection that is not a rotary and I would recommend the EIS be updated to address

PC008-12
Continued

PC008-13

PC008-14

PC008-15

PC008-16

PC008-17

PC008-18

PC008-19

PC008-20

PC008-21

PC008-13

Added to Section 4.12.1.3 under bolded heading of "State-Listed Threatened and Endangered Species" that MDIFW may request additional surveys for grasshopper sparrow and upland sandpiper prior to any activities which may impact their habitat.

PC008-14

The Vernal Pool Survey has been included in the EIS as Appendix H. The Navy conducted a vernal pool survey in order to assess potential future impacts to these resources from redevelopment of NAS Brunswick under Alternatives 1 and 2. Field verification of vernal pool boundaries and classifications were not requested from MDIFW because the surveys were completed for planning level purposes only. As stated in Section 4.12.1.4 under the bolded heading of "Vernal Pools", of the EIS, future developers would be required to consult with MDIFW to receive verification of vernal pool boundaries and classifications to minimize development impact on vernal pools or their regulated buffers.

Text has been updated in the EIS in the "Vernal Pools" subsection of Sections 3.12.4 and 4.12.1.4 to clarify the purposes of the vernal pool study and to call out Appendix H.

PC008-15

Impacts to the Pitch Pine-Heath Barren community were not addressed under the state-listed threatened and endangered habitat section because this community at NAS Brunswick has not been identified as supporting any state-listed threatened or endangered species. Instead, impacts to this critically imperiled community were discussed under the vegetation section (Sections 4.12.1.1 and 4.12.2.1)

PC008-16

PC008

Text of the EIS has been revised in Section 5.3.7 under bolded subsection "Vernal Pools" to correctly display that 15 significant vernal pools are within the development district and 13 significant vernal pools are located within natural areas.

EIS text has been updated to clarify the difference between vernal pools and significant vernal pools (Section 4.12.1.4, under subsection "Vernal Pools") to address comment regarding "location of other 18 pools". Vernal pools and significant vernal pools are of different designations. The 28 described is not a subset of the 46 but an entirely separate set of pools. As part of the public comment process, the Navy has since learned the location of two more significant vernal pools making the total on the NAS Brunswick property 30 significant vernal pools (Brandt 2010). Therefore, there are 76 "pools" on the installation property: 46 of which are vernal pools and 30 of which are significant vernal pools.

Information on required buffers around significant vernal pools has been added to the "Vernal Pools" subsection of the EIS within Sections 4.12.1.4 and 4.12.2.4.

PC008-17

Transportation analyses for Alternatives 1 and 2 with and without the proposed Route 1 Connector have been added in Sections 4.4.2.2; 4.4.2.3; 4.4.3.2; and 4.4.3.3.

PC008-18

Section 4.4.1 has been updated to describe the final design of this project, and the final design has been considered in the traffic analyses for each alternative.

PC008-19

The updated traffic analysis (see Appendix D) incorporates the new traffic pattern on Gurnet Road (one thru lane northbound and a center two-way left-turn lane).

PC008-20

Text has been added to Tables 4.4-2 and 4.4-9 to denote the rural residential character of these roads. Although these roads would provide access to the installation (AP-5 and AP-6), the majority of people would access the installation at AP1-AP4 in the northern portion of the installation or AP-7 and AP-8 on the western side. The increase in vehicles would be an impact on the rural residential character of Coombs Road and Purinton Road, however, they have the capacity to accommodate the additional traffic.

PC008-21

At the time of the DEIS, the design for this location was not finalized. Since then, Maine DOT worked with a consultant to determine a final improvement plan for the Maine Street Rotary. This plan, which ultimately resulted in small changes to the existing roadway configuration, is included in the analysis presented in the FEIS as intersection I-9. This intersection was designed based on the build volumes for Maine Street Station, as opposed to the long-term development and growth potential in and around downtown Brunswick.

traffic impact on that intersection based on the approved design per the final Preliminary Design Report process. The revised approved plan for this intersection mainly addresses High Crash Locations and does not really improve capacity. I would like to know more about the traffic impact to this intersection due to the redevelopment

- 16. Section 4.8.13 Storm Water. DEIS has not addressed adequately the storm water runoff, as a site specific impact. DEIS indicates to expect 343 acres of new impervious surfaces will be added as part of the redevelopment activities, representing 67% more impervious area than presently existing on the site. FEIS should address more on the impact as the majority of storm water runoff from the BNAS site will discharge into two (2) impaired watersheds identified by Maine DEP, Jordan Avenue and Mere Brook. On page 4-144, DEIS indicates compliance with MDEP Storm water Management Law for projects disturbing more than 1 acre. In addition to the 1 acre disturbance threshold, a project draining to an impaired watershed has additional storm water criteria to address. FEIS should elaborate more about these impacts, mitigation needed to allow site redevelopment for projects at impaired watersheds. For example, the Town of Brunswick had two projects draining to impaired watersheds, Maine Street Station and the new Harriet Beecher Stowe Elementary School on McKean Street; storm water management became a major factor and expense in the site development.
- 17. Section 5.3.7 (page 5-27). The DEIS does not describe cumulative impact on deer wintering areas, a type of Significant Wildlife Habitat. The FEIS should describe these impacts.

We appreciate the opportunity to provide comments. Should you have any questions, please contact me.

Sincerely,

Gary L. Brown

Gary L. Brown, Town Manager

- cc: Town Council, Town of Brunswick
- Anna Breinich, Director Planning and Development
- Tom Farrell, Director Parks and Recreation
- John Foster, Director Public Works
- Denise Clavette, Special Projects Assistant
- David Markovchick, Director Economic and Community Development
- Town of Brunswick, Conservation Commission
- Town of Brunswick, Recreation Commission
- Steve Levesque, Executive Director, MRRA

PC008-21
Continued

PC008-22

PC008-22

Text was added to Section 4.8.1.3 that any party proposing development of the property will be required to implement storm water management practices in accordance with local and state regulations. In addition, text was added that the town of Brunswick would encourage any party proposing development to prepare a storm water watershed management plan. Text was added to Sections 4.8.1.3 and 4.8.2.3 to identify the mitigation requirements for development within the watersheds of designated Urban Impaired Streams.

PC008-23

PC008-23

Analysis of deer wintering areas was added to cumulative impacts section (Section 5.3.7, Deer Wintering Habitat).

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Falmouth, Maine 04105
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June 28, 2010

David Drozd
Director, BRAC Program Management Office Northeast
Attn: Brunswick EIS
4911 Broad Street, Building 679
Philadelphia, PA 19112-1303

Dear Mr. Drozd:

On behalf of Maine Audubon, I would like to offer the following comments regarding the draft EIS for the reuse and disposal of the Brunswick Naval Station, located in Brunswick, Maine. Maine Audubon is a state-wide non-profit environmental organization with over 10,000 members and supporters. We work to conserve Maine's wildlife and wildlife habitat by engaging people of all ages in education, conservation and action.

Our primary interest in the future of Brunswick Naval Air Station lands is maintaining their designation as one of Maine's Important Bird Areas (IBA). This designation was based on key pitch pine, grassland and saltmarsh habitats that support concentrations of bird species of conservation concern. Please see attached Appendix A for more detailed information about the IBA program in Maine, and ornithological information about this site.

We feel the impacts to wildlife from the Preferred Alternative for facility reuse will be much greater than what has been outlined in the EIS, and that modifications to this alternative are necessary to adequately protect these important habitats in the future. Specific concerns include:

- Development of the Little Bluestem-Lowbush Blueberry Sandplain Grassland Community at the northern end of the runway. This habitat is globally rare, and at the state level is critically imperiled. It is the only community type in the state that supports grasshopper sparrow, a state endangered species, and is one of only four breeding locations for this species in the state. This habitat also supports the state-threatened upland sandpiper. The loss of up to 25 acres of this habitat under the Preferred Alternative (including the construction of a rail spur, access road and office building) is an unacceptable impact to this extremely rare habitat type.
- Loss of up to one-third of the Sandplain Grassland community (65 acres) could result from development within the Education/Natural Areas Land Use designation. Again, an unacceptable impact to an extremely rare habitat type and one that could be avoided with more restrictive prohibitions on built structures and habitat alterations.

PC009-1

MDIFW and MNAP have indicated that loss of up to 25 acres of the critically imperiled Sandplain Grassland community could have a significant impact on the state-listed endangered grasshopper sparrow. The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts approved in the Reuse Master Plan. However, as stated in the EIS the Navy acknowledges that potential construction could have significant impacts on the Sandplain Grassland community and grasshopper sparrow. Future developers will need to consult with MDIFW and MNAP regarding this critically imperiled habitat.

PC009-2

MDIFW and MNAP have indicated that loss of 65 acres of the critically imperiled Sandplain Grassland community under Alternative 2 could have a significant impact on the state-listed endangered grasshopper sparrow. As stated in the EIS, the Navy acknowledges that potential construction could have significant impacts on the Sandplain Grassland community and grasshopper sparrow. Future developers will need to consult with MDIFW and MNAP regarding this critically imperiled habitat.

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PC009-1

PC009-2

PC009-3

The text in Section 5.3.7 under bolded subheadings of "Vegetation", "Wildlife" and "Threatened and Endangered Species", was modified to acknowledge that there will be a significant cumulative impact on the state-listed endangered grasshopper sparrow through loss of the critically imperiled Sandplain Grassland habitat. Language was also added documenting that the Sandplain Grassland habitat at NAS Brunswick in one of only four sites in the state where grasshopper sparrows breed.

PC009-3

PC009-4

PC009-4

Section 3.12.3 and Table 3.12-3 were updated using the most recent list of state species of special concern. In addition, impacts to state species of special concern were added to Sections 4.12.1.3 and 4.12.2.3, as well as the cumulative impacts Section 5.3.7.

PC009-5

PC009-5

Impacts to state species of special concern were added to Sections 4.12.1.3 and 4.12.2.3. Under Alternative 1, the saltmarsh community and associated forested buffers along Harpswell Cove would be preserved within the Natural Areas district. The Mere Brook area is within the Natural Areas, Education/Natural Areas, and Open Space/Recreation districts. Some development would occur within the Education Area but would avoid impacts to Mere Brook to the extent possible. Planned recreational facilities would likely avoid direct impacts to Mere Brook. Once plans are prepared, the developer would be required to consult with state agencies to obtain any required permits.

PC009-6

Impacts to saltmarsh sharp-tailed sparrow and Nelson's sharp-tailed sparrow would be minor under Alternative 2. The saltmarsh community and associated forested buffers along Harpswell Cove would be preserved within the Natural Areas district. The Mere Brook area is within the Natural Areas and Education districts. Some development would occur within the Education Area but would avoid impacts to Mere Brook to the extent possible. Once plans are prepared, the developer would be required to consult with state agencies to obtain any required permits.

• We disagree with the conclusion of the EIS that cumulative impacts to endangered grasshopper sparrow habitat will be "non-existent" or "reduced" by any mitigation efforts or regulatory requirements. Habitat will be directly lost and habitat quality in surrounding areas will be severely diminished by the construction of an entrance road, rail spur, and professional office park directly in core historic breeding habitat for the state-endangered grasshopper sparrow. Given the limited availability of this habitat across the state, these impacts will severely affect this species over the long-term, including recovery efforts underway. This species is limited to only four sites in the state of Maine.

• Development of other grasslands associated with the runway apron and approach areas known to support breeding horned larks (state special concern) and Eastern meadowlarks (state special concern), as well as Eastern towhees, field sparrows, vesper sparrows, and bobolinks, which are considered species-at-risk by Maine's IBA program. All of these species are limited by their narrow habitat niche, and impacts to these species-at-risk have been minimized in the current EIS for the Preferred Alternative.

• Tidal wetlands associated with Harpswell Cove and Mere Brook. These saltmarsh communities are among the largest remaining in Casco Bay and support saltmarsh and Nelson's sparrows (both state special concern as well as "species-at-risk" by the Maine IBA program). Existing forested buffers should be maintained to adequately protect this valuable bird habitat.

We encourage you to amend the draft EIS to more accurately reflect the true impacts from the potential loss of critically rare habitat to wildlife species at risk, including species listed as threatened, endangered and special concern. These species can not simply find another place to live. The habitat they need is extremely rare in the state of Maine. Given that there are thousands of acres *without* critically imperiled habitat on BNAS property available for development, we respectfully ask that the Master Reuse Plan be amended to move development away from the sandplain grasslands and pitch pine communities.

Please do not hesitate to contact me if you have any questions about the Maine IBA program, or the reasons for designating BNAS as an IBA.

Thank you for the opportunity to comment on the draft EIS.

Susan M. Gallo
Wildlife Biologist
Director, Maine Important Bird Areas Program

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PC009-6

The Reuse Master Plan was produced and adopted in September 2007 by the BLRA Board of Directors. The Navy analyzed the land use districts in the approved Reuse Master Plan. It is outside of the authority of the Navy and scope of this EIS to change any of the land use districts approved in the Reuse Master Plan.

Text added to Sections 4.12.1.1 and 4.12.1.3 of the EIS stating that any party proposing development or other land disturbance in [Sandplain Grassland and Pitch Pine Communities] would be required to consult with the MDIFW and MNAP to receive the appropriate permits and clearances.

IMPORTANT BIRD AREAS OF MAINE

An Analysis of Avian Diversity and Abundance

Compiled by:

Susan Gallo, Thomas P. Hodgman, and Judy Camuso



A-49

A Project Supported by the Maine Outdoor Heritage Fund



Maine's landscape offers a variety of ecosystems, which provide habitat for a diverse array of wildlife. Maine birds have long been the focus of observation and study and their distribution and abundance has been well documented by ornithologists for over 100 years. The concept of an important bird area, a place where the abundance and/or diversity of birds is especially important for conservation or outreach, has been recognized for many years though never described as such. The Maine Dept. of Inland Fisheries and Wildlife (MDIFW), Audubon, The Nature Conservancy, the U.S. Fish and Wildlife Service, Acadia National Park, and numerous land trusts, as well as others, have, for decades, helped to conserve many areas important to birds and other wildlife and natural communities. Maine itself could be considered an important bird area. At one time, only one nesting island (Old Man Island off Cutler in Washington County) remained in the eastern U. S. for Common Eider, a species which numbers in the tens of thousands today. Also, the tremendous recovery of the Bald Eagle in the northeast could in part be founded in the population, which remained in eastern Maine despite ever-present threats of DDT elsewhere along the eastern seaboard.

History

In 2001, Maine Audubon, with the assistance of staff from MDIFW, set out to identify the most important areas for bird conservation in Maine. This project follows others throughout the U.S. that set forth similar objectives, each with a slightly different approach. We received a grant from the Maine Outdoor Heritage Fund during spring 2001 and MDIFW contracted with staff of Maine Audubon to provide project leadership. We used a slightly different approach from most other states in that our process used site-specific bird abundance data to make determinations of whether a site was indeed "important". We created a steering committee that we informed of the project and its status, and more importantly, a technical committee to advise us on establishing numeric criteria for assessing relative importance of each area.

What is an Important Bird Area?

An Important Bird Area (IBA) is a location that provides important habitat for one or more species of breeding, wintering, or migrating birds. IBAs generally support birds of conservation concern (including Threatened and Endangered Species), large concentrations of birds, or birds associated with unique or exceptional habitats. Furthermore, an IBA may be an area, which has historically been the location of a significant amount of avian research. In Maine, we typically identified "sites" which met certain numeric thresholds for abundance and diversity then assembled groups of these "sites" into "areas" (i.e., IBAs) based on their proximity to one another or thematically, typically based on the ecosystem within which they occur. Therefore, an IBA in Maine consists of one to several sites that support a high abundance (or diversity) relative to other sites supporting that species (or group of species).

Qualifying Criteria

A site qualifies for inclusion in an IBA if it meets at least one of the three primary criteria below. Two additional secondary criteria also are included that may strengthen the qualifications. *These*

criteria are not absolute and should be viewed as guidelines only. Consideration of an IBA was based on how well its component sites met the criteria. Some sites met several criteria. Other factors, such as relative importance or a unique combination of characteristics, were considered when making final selections. A full description of the criteria used to evaluate sites is provided as an appendix.

Primary Criteria:

1. Sites for Threatened and Endangered Species
2. Sites for Species of Conservation Concern
3. Sites with Substantial Concentrations of Birds and/or High Species Diversity
This criterion was applied to the following categories:
 - A. Water Birds
 - B. Seabirds
 - C. Shorebirds
 - D. Wadingbirds
 - E. Raptors
 - F. Migratory Land Birds
 - G. Exceptional Abundance/Diversity

Secondary Criteria:

4. Sites for Species in Rare, Vulnerable, or Exemplary Habitat Types
5. Sites Important for Research/Monitoring

Data Use and Applicability Disclaimer

The Maine Important Bird Areas Project began in 2001, and by the time this document was prepared, significant time had elapsed. Consequently, some of the data may be slightly out of date. Furthermore, some IBAs may not currently support the same abundance and diversity as when evaluated for this project. It has been the philosophy of this project to evaluate qualifying data for a site, regardless of whether the site still supports equivalent numbers of birds. In essence, we believed that once a site qualified, it generally had the potential to support similar numbers of birds, given the habitat has not changed irreparably. We did not, however, consider data (often only available for seabird nesting islands) prior to the mid-1980s. Our analysis, therefore, examined diversity and abundance of birds in Maine for sites with available data from roughly 1985 to 2005.

Identification of a site or collection of sites as an IBA carries no legal standing and affords no special protection under Maine Law. The results of the Maine IBA project are not meant in any way to supplement or enhance the Maine Natural Resources Protection Act or other resource protection laws. The sites described in this document merely reflect an analysis of mostly public

data to better facilitate public (and landowner) awareness, leading to improved conservation of resident bird populations, improved landscape-level habitat conservation, and possible community-scale economic benefits from increased birding opportunities.

Acknowledgements

The coordinators would like to thank all the Technical Committee members (Brad Allen, Louis Bevier, Lysle Brinker, Barry Burgason, David Evers, Norm Famous, Scott Hall, Ron Joseph, David Ladd, Don Mairs, Judy Markowsky, Jan Pierson, Bill Sheehan, and Peter Vickery) who attended meetings over the course of several years and exhibited extreme patience as they waited for each step in this lengthy process to be completed. We appreciate their time and effort spent writing and editing site descriptions, contributing ornithological data, and making the IBA process in Maine objective and unbiased. We especially thank Linda Welch from the Maine Coastal Islands National Wildlife Refuge, Kate O'Brien from Rachel Carson National Wildlife Refuge, Lindsay Tudor from MDIFW, and Bob Houston from U. S. Fish and Wildlife Service, Gulf of Maine Program for their help compiling data for use in our analysis and to Brad Allen for sharing his wealth of knowledge on Maine's coastal islands. Bruce Connery of Acadia National Park and Nancy Sferra of The Nature Conservancy provided helpful criticisms of earlier drafts of the site descriptions. Linda Alverson and Jody Despres provided input at an early stage of the project.

Maine Important Bird Areas

Site and Area Descriptions

Freeport/Brunswick IBA

Cumberland County

Brunswick Naval Air Station (including Mere Brook)

Brunswick

Description - This more than 1,400-acre property includes airfields, runways, towers, hangars and residential buildings. It has been managed as a Naval Air Base with permanent structures and landing strips since the early 1950s. Two areas within the base stand out as significant areas for birds. The southern portion of the base (Mere Brook and the surrounding wetlands) is characterized by high and low marsh habitats in an unusually large and unfragmented block. Because the area is on the Naval Air Station, the saltmarsh itself has very little human visitation or disturbance. A series of weapons bunkers and service roads are visible from the marsh in the uplands to the east. The second area within the base that is particularly valuable to birds is the northwestern portion that contains primarily grasslands (maintained in part by mowing for airstrips) as well as patches of pitch pine forest.

Bird Resources - Extensive airfields at this site are maintained as grassland habitat and are home to nesting Upland Sandpipers, Horned Larks, Bobolinks, Eastern Towhees, Eastern Meadowlarks, Grasshopper Sparrows, Field Sparrows and Vesper Sparrows. The site also has one of the highest concentrations of Savannah Sparrows recorded in the state. For its size, Mere Brook supports good numbers of both species of Sharp-tailed Sparrows. Herons, egrets, and numerous swallows forage here as well. Northern Goshawks have been observed at this site.

Conservation Issues - Contamination of ground water and soils from pesticides and fuel has been significantly reduced due to extensive clean-up efforts in the 1990s. Long-term monitoring is planned for the site. However, the base has been decommissioned and is due to close within the next ten years. Future ownership and management of this site is therefore unknown, but the likelihood of sustaining extensive grassland habitat is unlikely without extensive conservation efforts.

Ownership/Access - The site is owned by the Department of Defense. There is no public access without extensive security clearance.

Selected Ornithological Data

BNAS, Mere Brook

Criteria	Common Name	Maximum #, Unit, Year	Season
Species at Risk	Nelson's Sharp-tailed Sparrow	17 Breeding Adults ¹ , 1997	Breeding
Species at Risk	Saltmarsh Sharp-tailed Sparrow	10 Breeding Adults ¹ , 1997	Breeding

BNAS, Grasslands

Criteria	Common Name	Maximum #, Unit, Year	Season
T/E Species	Upland Sandpiper	10 Adults ²¹ , 1985	Breeding
Species at Risk	Eastern Towhee	Present ⁸ , 1998	Breeding
Species at Risk	Field Sparrow	Present ²¹ , 1986	Breeding
Species at Risk	Vesper Sparrow	15 Adults ²¹ , 1985	Breeding
Congregations: Migratory Landbirds	Savannah Sparrow	60 Adults ⁸ , 1998	Breeding
T/E Species	Grasshopper Sparrow	15 Adults ⁸ , 1997	Breeding
Species at Risk	Bobolink	Present ⁸ , 1998	Breeding
Species at Risk	Eastern Meadowlark	7 Adults ⁸ , 1997	Breeding

**Maquoit Bay
Brunswick**

Freeport IBA

Description - A narrow coastal bay south of Brunswick and east of Freeport with exposed mudflats at low tide.

Bird Resources - This area supports the highest documented concentrations of wintering American Black Ducks and Canada Geese in the state. A variety of shorebirds use this site as a feeding area during migration. In the spring, Northern Shoveler, Blue-winged Teal and Green-winged Teal are among the many waterfowl species that feed and rest in the bay during migration. In addition, the marshes in the area support nesting Nelson's and Saltmarsh Sharp-tailed Sparrows, and Bobolinks nest in neighboring upland fields.

Conservation Issues - The land surrounding the bay is highly desirable and subject to high development pressure. The Trust for Public Land has been working to purchase conservation easements and/or property bordering the bay. Increased recreational use in the bay could influence staging and wintering birds. Oil spills in neighboring Casco Bay are an on-going threat and could be devastating to wintering waterfowl that use the area.

Ownership/Access - Lands surrounding Maquoit Bay are a high priority for both local and regional land trusts, and many areas have either been acquired or subject to conservation easements. Because access remains difficult, the area is best viewed from the water. A public boat launch is available at Wharton Point at the end of Maquoit Rd in Brunswick.

Selected Ornithological Data

Criteria	Common Name	Maximum #, Unit, Year	Season
Congregations: Water birds	Canada Goose	800 Adults ²⁷ , 2001	Migration

The EIS examines the land use districts outlined in the Reuse Plan. Expanding the runway protection zones by the FAA falls outside of the scope of this EIS.

June 28, 2010

David Drozd, Director
Department of the Navy
BRAC Program Management Office Northeast
4911 Broad Street
Philadelphia, PA 19112

Re: Comments of Bowdoin College on Draft EIS for the
Disposal and Reuse of Brunswick Naval Air Station

Dear Mr. Drozd:

These comments on the draft Environmental Impact Statement ("DEIS") prepared in connection with the proposed disposal and reuse of the Brunswick Naval Air Station ("BNAS") are submitted on behalf of Bowdoin College. The College's review has focused on the areas to be conveyed to the College pursuant to the public benefit conveyances approved in the Reuse Plan and by the Department of Education. Particularly since the DEIS reviews environmental conditions from a broad rather than detailed field perspective, the College accordingly reserves the right to submit additional comments and to participate in future consideration of all environmental issues being addressed on the Base as more detailed information about the environmental conditions and proposed cleanup emerge.

That said, the College believes there are some important issues requiring further consideration at this time. These include (1) the proper "clear zone" or "runway protection zone" necessary for airport reuse, which has become a concern in light of recent FAA comments that suggest that it may wish to expand one of these zones beyond the 1,000 foot buffer already established and in a manner that would potentially foreclose the College's development of a 6-acre parcel along Bath Road, which is to be conveyed to the College pursuant to the Reuse Plan, the Department of Education, and the recently-adopted Town of Brunswick Zoning Ordinance amendments; (2) the need for additional access points, including at least one identified in Alternative 2; (3) the need to provide additional noise evaluations on non-airport districts; (4) clarification of the scope and extent of wetlands on the west side of the Base; and (5) the scope and extent of the pitch pine community.

I. Airport Use

The DEIS evaluates two alternatives: the preferred alternative adopted in the Reuse Plan, which includes an airport, and a second alternative that does not include airport use. Both the

Reuse Plan and the recently adopted Town of Brunswick zoning ordinance amendments make clear that the "clear zone" at the north end of the runways to be created as part of airport redevelopment does not extend beyond a straight line approximately 1,000 feet running parallel to the runways on the west. Recently the FAA apparently has asked for an expanded "clear zone" or "runway protection zone" beyond the 1,000 foot buffer that, if granted, would effectively eliminate the use of one of the parcels to be given to the College, as approved in the Reuse Plan, by the United States Department of Education, and in the Town's Zoning Ordinance. While the College is not opposed to the airport use, the final EIS should make clear that the "clear zone" or "runway protection zone" should not be expanded to foreclose College use of this 6-acre parcel.

2. Access Points

The final EIS needs to consider at least one additional access point: at the Northwest corner of the Base at the end of Pine Street to access the 6 acre parcel to be conveyed to the College. It should also consider whether for purposes of permitting access to the Coast Guard and FAA sites, Access Point 8 as identified in Alternative 2 should also be included in Alternative 1. That access point would allow much more direct access to these sites, particularly in light of the conversion of the perimeter road to an emergency vehicle access/foot and bike path.

3. Noise

The DEIS states that "[a]s modeled, all DNL noise contours above 65 dBA are located within the Airport Operations Land Use district; none of the projected 65 dBA noise exposures are located outside of the installation boundary or within any other land use district on the installation." (4-129).

The EIS needs to evaluate noise impacts on the other land use districts, particularly the education and education/natural resource districts. Noise levels above 50 dBA, particularly at night, could pose a significant problem for certain types of potential development and need to be assessed. Although the State and local noise requirements may not apply, their limitations are based on significant experience in assessing noise levels at residences, within 500' of residences, and at property lines. These noise levels should at least be considered in the evaluation of the noise impacts from airport operations.

4. Wetlands

The identification of the scope and nature of the wetlands on the west side of the Base seems to rely on old data and to require substantial additional field work. The ultimate determination of the presence of wetlands, their functions and values (including vernal pools) will play a significant role in determining which property is ultimately conveyed to the College and which property is conveyed to the Town, since under the Reuse Plan 170 developable acres are to be conveyed to the College.

PC010-1
Continue

PC010-2

The on-base roadways identified under Alternatives 1 and 2 show only "major roadways" proposed under each development scenario. There will also be a network of secondary roadways that would allow access to various areas of the former installation; however, until the final design is determined, all roadways (and access points) are proposed and subject to alteration as needed.

PC010-2

Text has been added to Sections 2.3.1 and 2.3.2 to clarify that the proposed roadway improvements and access points under Alternative 1 and 2 may be refined during the design process.

PC010-3

PC010-3

Text has been added to Section 4.7.1.2 under bolded subsection "Future Noise Exposure Contours" to summarize the Town of Brunswick noise standards as listed in the Town of Brunswick Zoning Ordinance (2009a). The noise associated with future aircraft operation is in compliance with the zoning standards. With proper siting and sound attenuation techniques, it is not expected that there would be any restrictions on construction of buildings in the surrounding land use districts.

PC010-4

PC010-4

The wetland analysis utilized historical wetland information from Navy documents and NWI databases. This information was mapped and then spot-checked in the field. The wetland types and extent presented in the EIS utilizes the best information available and that satisfies the requirements under NEPA.

Text has been added to Section 4.11.1.4 to clarify that additional wetland delineation studies would need to be performed for development design and permitting.

A-57

5. Pitch Pine - Heath Barren

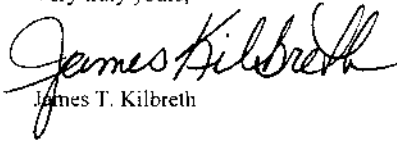
The DEIS states that approximately 5 acres of the critically imperiled Pitch Pine-Heath Barren community could be impacted in the education land use district located in the northwestern portion of BNAS adjacent to Bath Road. Although some historic mapping depicts this 5 acre area as a component of a larger Pitch Pine-Heath Barren community, there is a lack of sub-canopy species that is consistently present with this rare community type. Also, the small size, fragmented nature, evident level of alteration and disturbance and general absence of exemplary characteristics in this 5 acre area renders this as unlikely to be a candidate of an S1 natural community. The EIS should note that on-site consultation with the Maine Natural Areas Program is needed to evaluate the full extent of the Pitch Pine-Heath Barren community in the education land use district and determine if the community is present where impacts might occur.

PC010-5

Text has been added in Sections 4.12.1.1 and 4.12.1.2 clarifying that on-site consultation with the Maine Natural Areas Program (MNAP) would be needed to evaluate the presence and/or extent of the Pitch Pine-Heath Barren community in the education land use district

Thank you for your consideration of these comments.

Very truly yours,



James T. Kilbreth

JJK/prf
cc: Barry Mills, President
Gary Brown
Steve Levesque
Catherine Longley

A-58

Public Hearing Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station (NAS) Brunswick, Maine



You are invited to comment on the Draft Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station (NAS) Brunswick, Brunswick, Maine. To be most helpful, comments on the Draft EIS should be clearly written and describe specific issues, topics or page numbers from the document. Comments may be submitted in one of the following five ways: (1) fill out this comment sheet and drop it into a comment box before leaving the public hearing, (2) mail your comments using this form, (3) fax your comments to (215) 897-4902 Attn: Brunswick EIS, (4) e-mail your comments to david.drozdz@navy.mil, or (5) speak your comment at the public hearing, which will be recorded by a court reporter.

All comments must be postmarked by June 28, 2010
Brunswick (ME) Naval Air Station

The BLRA Master Plan of Dec '09, Preferred Alternative, continues to show a connecting road from between Routes 24 and 173 passing through an area designated Open Space and Recreation. It should be obvious that it is imprudent to mix traffic and people of all ages.

PC011-1

PLEASE PRINT * ADDITIONAL ROOM IS PROVIDED ON BACK

A-59

1. Name [REDACTED]
2. Address [REDACTED]
3. E-mail [REDACTED]
4. Please check here if you would NOT like to be on the mailing list
5. Please check here if you would like your name/address kept private

Please drop this form into one of the Comment Boxes here at the PUBLIC HEARING MEETING or fold (see fold lines on back) and mail.

YOUR INPUT MATTERS

Public Hearing Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station (NAS) Brunswick, Maine



PC012

PC012-1

The land will be conveyed to the Town of Brunswick through a Public Benefit Conveyance so the town will not have to pay for the land from the Navy. This effort is described in the EIS in Section 4.1.1.1 under the bolded subsection "Approved Public Benefit Conveyances".

You are invited to comment on the Draft Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station (NAS) Brunswick, Brunswick, Maine. To be most helpful, comments on the Draft EIS should be clearly written and describe specific issues, topics or page numbers from the document. Comments may be submitted in one of the following five ways: (1) fill out this comment sheet and drop it into a comment box before leaving the public hearing, (2) mail your comments using this form, (3) fax your comments to (215) 897-4902 Attn: Brunswick EIS, (4) e-mail your comments to david.drozdz@navy.mil, or (5) speak your comment at the public hearing, which will be recorded by a court reporter.

All comments must be postmarked by June 28, 2010

I hope that the government is not going to charge the town of Brunswick for the land on the Brunswick Naval Air Station as the town of Brunswick gave that land to the Navy for development of the base in the 1940's for free.

PC012-1

PC012-2

There are currently no plans to bulldoze any homes on the former installation.

I am also concerned, as I previously read in the Times Record, that the business which is responsible for selling the housing on BNAS, was going to have some of the homes bulldozed & sell other housing but not the property. I am not in favor of the property being bulldozed. We need housing in Brunswick especially for low income people & we need rental property besides homes for sale. I also think that when the homes are sold the property should be sold also. I think that this would make the homes & property more marketable.

PC012-2

PC012-3

The EIS analyzes land use districts as outlined in the adopted Reuse Plan. The area identified as passive recreation could potentially be used for gardens. MRRA is coordinating the reuse.

I think that Brunswick Gardens should have some space & some area for the public to have their own gardens which they could work themselves. I do not think that the Brunswick Gardens should take the golf course land though. I think that we should keep the golf course which I liked to golf there & there were race people so that it was better for beginners & others than the Brunswick Golf Club. The Brunswick Gardens can be given other property on the base. We should have technology & sport use, I am even in favor of being able to purchase a ticket & being able to fly out of Brunswick to Fort Lauderdale, Boston, and beyond.

PC012-3

PLEASE PRINT * ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name [redacted]
2. Address [redacted]
3. E-mail [redacted]

4. Please check here if you would NOT like to be on the mailing list
5. Please check here if you would like your name/address kept private

Please drop this form into one of the Comment Boxes here at the PUBLIC HEARING MEETING or fold (see fold lines on back) and mail.

YOUR INPUT MATTERS

A-60

10 Garden Street
Bath, ME 04530
June 19, 2010

Dept. of the Navy
Base Realignment & Closure Program Management Office
4911 South Broad Street,
Phila. PA 19112-1303

Subject: Public comments on the May 2010 (draft) EIS for NASB

I recommend changes as follows:

1. Under "Water Resources" it should be noted that "Vernal Pools" need to be identified in a zoning ordinance to achieve protective status.

2. Add a Section on Storm water management.

There is a need to discuss whether the existing NPDES permit can be extended for aircraft operation or whether a new one should be promulgated for Development Alternative I.

Related to storm water management and (NPDES) permitting is the Picnic Ponds. (According to Navy testimony at RAB meetings, they are storm water retention ponds, so it is misleading to identify them as "Picnic Ponds.") These impoundments inhibit fish passage and that should be part of an EIS. According to a former Brunswick Marine warden, the feeder stream near Purington Road was a prime smelt fishery, and the retention pond system was the probable cause of its demise. The EIS should identify this resource and the environmental benefits of fish passage restoration.

3. Revise Section 3.5

This section discusses the environmental contamination issues. To insure a full understanding of its significance it must be complete and up-to-date. It appears that the information is significantly outdated and contains significant omissions. Issues that need to be clarified are:

- A. No remediation plan has been proposed for Site 12 and no ROD exists.
- B. There are potential sites identified by the public that have not been listed.
- C. Site 9 has not been fully remediated and the Navy is currently evaluating further action.
- D. Further remediation is needed for ground petroleum contamination under Section 5.4.2 . Such contamination has not been currently defined but there is evidence of its presence in one retention pond. (As a matter of interest one photo included in the report shows an "oil boom" .)
- E. There needs to be a section on the current status of the GWETS.

4. Section 3.7 (Noise)

No noise data is provided for areas remote from the base property. As a resident living 3 miles away, I can certify that noise transmission on damp evenings is present, particularly from idling airplane engines.

5. Appendix G. Regarding wetlands vs. High Water Table areas.

The maps do not designate "high water table" areas such as the area adjacent to Enterprise Drive. This information should be added because it is essential to determine future suitability for development.

Sincerely,

Edmund E. Benedikt
Edmund E. Benedikt

PC013-1

Vernal pools are regulated and protected at the state level by MEDEP. Vernal pools are not included within the natural resource area layer in the Town of Brunswick Zoning.

PC013-2

Text in the EIS has been added to Sections 4.8.1.3 and 4.11 to clarify the requirements of the NPDES Permit. NPDES permits cannot be transferred, therefore; MRRR would need to apply for a new permit upon receipt of the base property.

PC013-1

PC013-2

PC013-3

PC013-4

PC013-3

Although it may be misleading, Picnic Ponds is the proper name for these features on the installation.

PC013-5

In addition, the text in the EIS indicates in Section 3.8.3 that Picnic Ponds are one of three "natural drainage systems [that] have been altered by the construction of retention ponds that holds and treats storm water."

PC013-6

PC013-7

PC013-8

PC013-9

PC013-10

PC013-4

Text was added to Section 4.8.1.3 that any party proposing development of the property will be required to implement storm water management practices in accordance with local and state regulations. In addition, the town of Brunswick would encourage any party proposing development to prepare a storm water watershed management plan. The storm water watershed management plan will describe measures to control the volume and quality of storm water runoff in a manner consistent with MEDEP storm water management policy. The plan could include measures to mitigate other impacts as identified by the town (e.g., restricted passage for fish due to construction and operation of storm water infrastructure).

PC013-11

PC013-12

Text was added to the EIS in Section 4.12.2.2 to discuss the benefit to aquatic organisms due to restoration of Mere Brook under Alternative 2.

19-A

PC013-5

Thank you for your comment. Information in the EIS was developed using 2008 as the baseline. It has been noted in the EIS that the Environmental Restoration Program at NAS Brunswick is a continuous program. For more detailed information on the program the reader can visit the web page dedicated to the Environmental Restoration efforts at NAS Brunswick here: <http://nasbrunswick.navy-env.com/index.htm>. The program also upholds an administrative record which can be accessed at the Curtis Memorial Library. This text has been added to the EIS in the introductory parts of Sections 3.5 and 4.5.

PC013-6

The text of the EIS does not indicate that there is a remediation plan or ROD for Site 12. Site 12 is "under investigation" and the Navy is working with the EPA and MEDEP to determine the appropriate next steps for further evaluation of this site.

PC013-7

The Navy is committed to fulfilling its environmental responsibilities as required by law, even AFTER the base closes.

PC013-8

The text of the EIS indicates that Site 9 has had soil removed and "investigations are underway and long-term monitoring and institutional controls are in place."

PC013-9

The Navy is committed to fulfilling its environmental responsibilities as required by law, even AFTER the base closes.

PC013-10

PC013

Thank you for your comment. For the purposes of this EIS, 2008 was utilized as the baseline year for analysis. This GWETS program is an on-going effort between the Navy, Maine DEP, and the U.S. EPA. For the current status or updates on this program, the reader can refer to the Environmental Restoration Program website, <http://nasbrunswick.navy-env.com/index.htm>, or the program's administrative record which can be accessed at the Curtis Memorial Library. This text has been added to the EIS in the introductory parts of Sections 3.5 and 4.5.

PC013-11

Noise levels were modeled in accordance with FAA standards. The noise analysis does not indicate that there would be significant noise leaving the air operations land use district (on a 24-hour average level).

PC013-12

Appendix G is the Wetland Functional Assessment dated June 2009 and does not include an examination of high water tables. The functional assessment's purpose is to use a descriptive approach to evaluate wetland functions and values for the Clean Water Act Section 404 Permit Program.

Added text to indicate that groundwater depths range from just below the surface to 20 to 30 feet below the surface to Sections 3.11.2 and 4.11.1.2

Thank you for your comment.



You are invited to comment on the Draft Environmental Impact Statement (EIS) for the Disposal and Reuse of Naval Air Station (NAS) Brunswick, Brunswick, Maine. To be most helpful, comments on the Draft EIS should be clearly written and describe specific issues, topics or page numbers from the document. Comments may be submitted in one of the following five ways: **(1)** fill out this comment sheet and drop it into a comment box before leaving the public hearing, **(2)** mail your comments using this form, **(3)** fax your comments to (215) 897-4902 Attn: Brunswick EIS, **(4)** e-mail your comments to david.drozdz@navy.mil, or **(5)** speak your comment at the public hearing, which will be recorded by a court reporter.

All comments must be postmarked by June 28, 2010

I appreciate the very large investment and resources that were devoted to the reuse plan for the Naval Air Station. It is a unique opportunity for the community to gain enormously valuable resources, and the objective is to do the right thing so that future generations will be able to enjoy this property as well as those of us who intend to do so over the 20-year site development period.

In reviewing all of the available information in the report as well as reading the supplemental correspondence, I applaud preferred Alternative 1 as combining the most intelligent and beneficial features of all of the discussed plans. The continuation of the airfield is crucial to the long-term growth of the community, and the adjacent commercial space will be a magnet for future development. The recreational and other dedicated areas will also be welcome additions to the community. Increasing the value of all of the properties in the town.

All of the persons involved in iterating this plan and carrying it forward through the many regulatory steps are to be highly commended.

Sincerely yours,

C. Forbes Dewey, Jr.
 189 Allen Point Road
 Harpswell, ME 04079

PC015-1

A-65

PC016-1

Thank you for your comment.

Public Hearing Comments**RE: Draft EIS, NAS Brunswick, Brunswick Maine****17 June 2010**

As a private citizen with significant experience in the field of Workforce Development, I am a proponent of actions that effectively and efficiently promote economic development and job creation. Therefore, I strongly support the Midcoast Regional Redevelopment Authority (MRRRA) plans for transfer of NASB by the Department of the Navy (DoN) to MRRRA for reuse. MRRRA proposes Alternative 1 (preferred alternative), which maintains airport operations and aviation-related businesses. This alternative supports business and technology industries and educational facilities. This is consistent with the Governor's target to develop high-wage and high-growth business sectors – namely aviation, advanced technology, and transportation. It is also consistent with the Brunswick Naval Air Station Master Reuse Plan.

PC016-1

With respect to Alternative 1, the projected build-out over 20 years will facilitate managed growth of highly desirable businesses and industries. This adds significantly to the region's ability to generate revenue, create sustainable employment, and fuel the area economy well into the 21st century. Much of the infrastructure is already in place, with the largest hangar (Hangar 5) being of recent construction. The twin 8,000-foot runways have been maintained in excellent condition. Together, they attract interest from flagship tenants whom would support hundreds of jobs upon locating to the property.

Securing industry compatible with facility use is a key concern to long-term successful redevelopment of NASB. In place, and complimented by the Public Benefit Conveyance of space to the University of Maine and Southern Maine Community College (included in the Master Reuse Plan), they would in turn attract a variety of businesses engaged in research and manufacture of products valued in a global economy. Alternative 1 also promotes the expansion of existing road and rail transportation, providing a distribution network for goods manufactured on site. Rail transportation will serve freight and passenger service, connecting people and goods to other clusters within the state. This encourages growth of a regional economy in the coastal corridor that supports more than half of Maine's population and employment.

Collaborative partners, (Economic Development entities at municipal, regional, and state levels; Chambers of Commerce; Post-Secondary Educational interests, Workforce Development, etc.) agree upon and support the statement that Maine is a 'great place to live, work, and play.' Alternative 1 makes generous allowance to preserve 1570 acres of NASB as recreational/open spaces and natural areas. This use of space assures alignment with the prevailing attitude that Maine has been, and will continue to be, a great place to raise families. Green space allows for passive experience of flora and fauna, while preserving wetlands for wildlife habitat. Recreational space assures places for children, adults, and families to play. New and growing families require affordable housing, and alternative 1

Scott Jacqmin, P.O. Box 952, Brunswick, ME 04011

Email: ksasindemand@yahoo.com

includes 215 units in the Brunswick area. These units, in addition to the housing not owned by the DoN, will enable renters and home buyers to have options available for occupancy, while minimizing a glut of unoccupied housing that will result from each of the other two proposed alternatives.

Should either of the remaining alternatives be selected, significant detrimental impact to the region's economy could likely affect long-term outcome of the property. Alternative 2 negates airport operations, thus making it difficult to attract business and technology sufficient to substantive economic development. This would translate to reduced job creation, while greatly increasing the residential district. This creates a ripple effect in surrounding communities, already concerned over a high vacancy rate resulting from departure of active duty personnel and their families as they have rotated to other duty stations. It also presents a potential degradation of existing natural environment, either through overuse of that space by people (assuming the 400 housing units proposed are occupied), and/or an unmanageable expense of preservation of natural space due to decreased revenues from business tenants.

The No-Action Alternative, being retained by the U.S. government in caretaker status, maintains a long-term void in the regional economy by eliminating the ability to utilize the very space that has been a major revenue generator in the area for nearly 6 decades. The environmental impact is less predictable; the only certainty is that there would be no indirect benefit of natural space to the region; it would be gated off from passive interaction.

Alternative 1 is well planned and articulated, providing a preferred future of manageable, sustainable growth of industries, jobs, and workforce. MRRRA has been visionary in their plans for reuse of NASB; the attention to detail is apparent in the proposal and its match with the Brunswick Naval Air Station Master Reuse Plan. In view of obligations to NEPA regulations, and with respect to their objectives, I advocate that alternative 1 is the most sound of alternatives presented.

* * *

Items 1-5 of the Public Hearing Comment Sheet are as follows:

1. Scott Jacqmin
2. P.O. Box 952, Brunswick, ME 04011
3. ksasindemand@yahoo.com
4. I would like to be on the mailing list
5. I do not need to have my name and address kept private.

Scott Jacqmin, P.O. Box 952, Brunswick, ME 04011

Email: ksasindemand@yahoo.com

From: [REDACTED]
To: Drozd, David CIV OASN (EI&E), BRAC PMO NE
Sent: Fri Jun 25 08:54:29 2010
Subject: Comments on Draft EIS for BNAS

Dear Mr. Drozd,

In looking over the Executive Summary for the draft EIS, I noted two mistakes:

(1) Page xi, line 13. Methane is incorrectly described as NH3, which is ammonia.

(2) Page ix, lines 3-4. "The Town of Brunswick and the Brunswick LMA do not have a significant minority or low-income population." With respect to a low-income population, this statement is both laughable and regrettable. A brief examination of the extensive programs carried out by the Mid-Coast Hunger Prevention Program as well as local United Way activities should set the record straight.

Sincerely,
Kermit Smyth
23 Juniper Road
Brunswick, ME 04011

PC017-1

Text in the EIS has been updated in the Executive Summary (ES.6, bolded subsection "Air Quality") to reflect this comment, Methane = CH₄. The rest of the document was rechecked to make sure that this comment wasn't reflected in any other section.

PC017-1

PC017-2

PC017-2

It has been noted that there are pockets of low-income populations within both the town of Brunswick and the Brunswick LMA. However, these pockets do not constitute an Environmental Justice community as defined by EPA. In addition, there are no specific impacts on general health or quality of life that would adversely or disproportionately impact the surrounding population. Therefore it was determined that no disproportionate adverse environmental justice effects would be associated with the implementation of any of the Alternatives.

Text has been added in the EIS in the Executive Summary (ES.6, bolded subsection Environmental Justice) and Sections 4.2.1.6 (Alternative 1), 4.2.2.6 (Alternative 2), and 4.2.3.6 (No-Action Alternative) to clarify.

PUBLIC HEARING

NOTICE OF AVAILABILITY (NOA)
 OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
 FOR THE DISPOSAL AND REUSE OF NAVAL AIR STATION (NAS)
 BRUNSWICK, MAINE
 June 2, 2010
 7:00 p.m.

Brunswick Junior High School, Gymnasium
 65 Columbia Avenue
 Brunswick, Maine 04011

APPEARANCES:

- CAPTAIN WILLIAM FITZGERALD, Commanding Officer, Brunswick
Naval Air Station
- DAVID DROZD, Director, Navy Base Realignment and Closure
- JEANETTE MACNEILLE, Resident of Topsham, Maine
- CAROL WARREN, Member, Brunswick Area Citizens for a Safe
Environment
- JOHN PERRALT, Brunswick Town Councilor, District 4
- ED DAILEY, Resident of Brunswick, Maine
- MICHAEL LAVERDIERE, Resident of Harpswell, Maine
- STEVE LEVESQUE, Executive Director of Midcoast Regional
Redevelopment Authority

A-69

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PROCEEDINGS

1
2 CAPTAIN WILLIAM FITZGERALD: For the recording
3 purposes, I need to stand at the microphone. I apologize.
4 I don't like doing that. But I appreciate you coming.
5 Those of you who came in from the Department of
6 Transportation meeting, I guess our plan worked because we
7 snagged you into our meeting, for this portion of it. So
8 thank you for coming. This is the second part of our two-
9 part meeting tonight. The first part, for those of you
10 who didn't have an opportunity to get here between 4:30
11 and 6:30, was to -- we had those information stations set
12 up in the back to give kind of a primer of what the
13 process is, the BRAC process, the EIS process. And this
14 second portion of the -- of the public hearing is now
15 going to be your opportunity to comment on the Draft EIS.
16 So as the Commanding Officer of the Naval Air Station, I
17 welcome you.

18 Public input into this process is critical for the
19 EIS. It makes it better in the end. And as you -- as you
20 probably know, this is a continuation. This is the second
21 public input period that we've had, the first one being
22 the scoping hearings that we had way back when, in
23 November of '08, if you can believe that. So now we've
24 come this far, and we're at the point where the Draft EIS
25 is now complete. It's out on the streets. And hopefully

BROWN & MEYERS
1-800-785-7505

1 you've had a chance to review it, or at least the sections
2 that -- that are of interest to you, and you are prepared
3 to comment on them. That's why we're here tonight.

4 Make sure I don't forget a couple things I want to go
5 over. I guess the only other thing I'll say is as we move
6 forward with this process and the rest of the base
7 closure, I will re-emphasize that the Navy, and I
8 personally, are genuinely concerned about the
9 redevelopment of the base. We will maintain -- we will
10 maintain our open and transparent process and our status
11 that we've maintained this whole time. There's nothing
12 going on at the Naval Air Station that the public can't
13 know about.

14 So I'm going to turn it over to Mr. Dave Drozd, who's
15 the Director of BRAC PMO, which is the Program Management
16 Office Northeast, out of Philadelphia. Mr. Drozd has --
17 has -- has come up here with some of his team in order to
18 -- and he's going to go through some slides to really set
19 the stage for what the process is going to be for this
20 public hearing. And hopefully we get -- we get some good
21 comments. Like they told us in -- in grade school,
22 there's no such thing as a dumb question. Well, there's
23 no such thing as a dumb comment. Please, this is your
24 opportunity to come up and speak your mind and say
25 whatever you want. We have a five-minute time limit that

1 -- that we'll talk about, but if we don't have, you know,
2 that many people who want to come up and talk, then --
3 then we can certainly be a little bit easier on that. But
4 don't hesitate to come up. Even if you didn't sign up to
5 be someone that comes up to the microphone, even as we run
6 through those people, if you do want to comment, take the
7 opportunity, and come on and get in line, and comment.
8 This is your opportunity to -- you know, to provide input
9 to the Draft EIS.

10 So with that, Dave?

11 MR. DAVID DROZD: Well, good evening everyone. My
12 name is Dave Drozd. As the Captain mentioned, I'm head of
13 the Navy's BRAC Program Management Office for the
14 Northeast. And among the things that our office is
15 responsible for is the execution of this Environmental
16 Impact Statement for the reuse of the base.

17 What we've -- what we've been doing for the last
18 several months is preparing, with a lot of effort, this
19 first draft of the document for review, for comment by the
20 public, federal organizations, elected officials, to get
21 your input on how we have done on preparing this, the
22 reuse document. What I'd like to go over in -- in my
23 presentation is essentially some of the things that we're
24 going to be talking about.

25 First I'd like to go over, for instance, what the --

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1 slide, please -- what the public hearing format's going to
2 be, essentially like the Roberts Rules of Order, on how
3 the meeting's going to be conducted. I'll also talk in
4 broad terms about the BRAC timeline. I'll talk about the
5 EIS process and our schedule. I'll touch briefly and
6 broadly on the Draft EIS document itself. The document
7 itself in paper form is out there. It's online on several
8 locations. It's in libraries. So it's -- it's out there
9 for people to look at. It's been online since about early
10 May, so hopefully you've had an opportunity to begin to --
11 to look at it.

12 But essentially, we'll talk about the BRAC schedule
13 also, and we'll also talk about the, again, alternatives.
14 The alternatives, I'll talk about them in broad terms.
15 You'll see there are boards back there that talk about
16 them in much more depth, and, of course, the report itself
17 goes into lots of depth on the various alternatives that
18 we looked at.

19 And, of course, at the end of that, then I'll
20 essentially throw the floor open to folks who'd like to
21 speak. Now, again, we encourage you to fill out a
22 speaker's card. There are folks in the back who will
23 collect those cards. This -- this particular meeting
24 we're having is one of many ways that we're trying to get
25 input into the DEIS process. We have, of course, a public

1 meeting today and tomorrow. We will also be accepting
2 input through regular mail, email, faxes, all that sort of
3 information. If you're not comfortable speaking or simply
4 prefer to submit your comments another way, we're more
5 than happy to accept your comments that way. So, please,
6 feel free. If you have any comments, issues, or concerns
7 about the document we've prepared, please feel free to put
8 your concerns into us in any way you feel that you -- that
9 you'd like to.

10 As far as -- again, starting with Roberts Rules of
11 Order, again, any person can speak -- go back one -- any
12 person can speak. We're going to be, you know, of course,
13 conducting it in an orderly manner with our comments. We
14 usually do them in an order based on elected officials,
15 organizations, and individuals, as they -- as they arrive.

16 Again, our purpose here is not necessarily to have a
17 question-and-answer session, but to gather your questions
18 and issues and concerns, so that when we take the next
19 step, which is the Final EIS, we hopefully have
20 successfully addressed each of the comments and concerns
21 that -- that you've raised. And again, if -- if your
22 comments that you have are lengthy, we're usually -- we're
23 going to try and limit folks' time. If you've got a
24 lengthy comment, you can summarize it here at the
25 microphone and submit it, perhaps in writing. That would

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1 be really helpful.

2 Again, if -- signing up to speak, right now we're
3 initially putting five minutes per person to speak. If we
4 don't have too many speakers, we have the ability to have
5 some flexibility on that, but right now that's what we're
6 shooting for at the present time. And again, the method
7 that you submit your comments, be it verbally or email or
8 whatever method, all will be given equal weight. All will
9 be considered as we prepare our Final Environmental Impact
10 Statement.

11 Again, I mentioned various means and methods of
12 getting it. You can look at it online, fax, emails. The
13 particulars on all those, how we -- you know, which fax
14 number or which email address, information on the back on
15 where those are, the thing that I would caution you about,
16 we do have a closing of the public comment period. That
17 is the 28th of June. So if you do have any comments that
18 you would like to submit to Navy, either today, tomorrow
19 at the public meetings, or by mail or email, please get
20 them into us by the 28th of June. And it's at that point
21 when we'll start to take those comments, rework our
22 document, and prepare the -- the Final Environmental
23 Impact Statement.

24 I mentioned I'd talk about the BRAC timeline. A
25 number of these things you're already well aware of, 2005

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1 being when the decision was made to -- to close the base.
2 2007 is when a reuse plan for the base was approved. Of
3 course, the process we're in right now, the midst of the
4 EIS process, was started in -- in '08. In fact, it was in
5 the fall of '08 when we were in this very building,
6 conducting what we call the scoping meeting, at which we
7 had another public meeting, saying that we're starting the
8 EIS. We'd like to hear from the public at that time to
9 find out what ought to be in the EIS. We tried to collect
10 those thoughts and give that back to you in the document
11 that's in front of you now. And hopefully, we -- we did a
12 fair job of that. That will be for you to tell us how
13 well we did on that document. And, again, that process is
14 ongoing, all leading up to conclusion of the EIS process
15 in the fall of -- of this year. And then, of course, in
16 2011 is when the -- the base is scheduled to close.

17 A bit more detail on the process, these are various
18 notices, documents required, not simply because Navy likes
19 to, but because it's required, normally by either statute
20 or regulation, that this process is followed in preparing
21 an -- an Environmental Impact Statement. Various notices,
22 scoping meetings, as I mentioned, is the second bullet
23 down. We right now are in the process -- we have a Draft
24 EIS in front of you. We've put a notice out. A notice
25 was put in the Federal Register in early May, but it was

1 also put into the local papers within a couple days of
2 that notice in the Federal Register. Notice the
3 highlighted one, public documents, public hearings.
4 That's what we're conducting today, and we're conducting
5 tomorrow, as well as collecting agency reviews and
6 comments. I mentioned, you know, this is a public
7 meeting, but during the same time that we are collecting
8 public input on our DEIS, we're also asking agencies,
9 public agencies, environmental regulators, whoever, to
10 also look at the document, let us know what they think
11 about it, any issues, concerns they may have with it that
12 we ought to be addressing in the final document.

13 And, of course, we will prepare a Final EIS.

14 Another notice -- just like we had a notice that the DEIS
15 was ready, there'll be a notice put out that the Final is
16 ready, and there'll be a brief what they call no-action
17 period in which any other comments, residual comments, can
18 be looked at then, before final action, which is called a
19 Record of Decision, a document signed out by the Assistant
20 Secretary of Navy, that says that the EIS process is
21 completed and that the decision has been made that the --
22 that it is concluded, and we move onto the further BRAC
23 actions.

24 Some particulars on, you know, what the EIS schedule
25 is, these are the dates we are showing right now for the -

1 - the DEIS, our hearings, when our comment period ends.
2 And I mentioned fall will be the time when we have the
3 FEIS and issue the Record of Decision.

4 One of the pieces within the DEIS that -- that's
5 sitting out there, well, again, the proposed actions that
6 we're -- that we're considering, what alternatives, what
7 are the -- the existing environments out there, both
8 natural and human, the consequences, and the cumulative
9 impacts of the various alternatives that we've considered.

10 Of course, the purpose and need is to provide for the
11 disposal and reuse of the closing base at NAS Brunswick,
12 as well as the need for the -- to regenerate the economy,
13 to generate jobs, and put back some of the -- the pieces
14 that have caused -- been caused by the closure of the
15 base, and that's the purpose and need of doing this
16 document in the first place. Of course, we've got some
17 various alternatives that we looked at in there, three
18 specifically. One is the preferred alternative. The
19 preferred alternative, of course, is the one that was
20 prepared by the local community, being implemented by MRRRA
21 now, to reuse the base as an airport. Our second
22 alternative will be for reuse as a non-airport. And the
23 third one, the No-Action Alternative, is one we're
24 required to look at essentially as a baseline in
25 comparison to the other two, one that's required as part

1 of the EIS process. Let's take a brief look at each of
2 those three alternatives, starting with Alternative 1.

3 The preferred alternative, Alternative 1, again, is
4 consistent with the Reuse Plan. For those who either are
5 new to Brunswick or don't know the Reuse Plan, the
6 Midcoast Regional Redevelopment Authority is charged with
7 executing that Reuse Plan. That document, of course, is
8 online and available for their review on what's on the
9 Reuse Plan, but I think most of the folks in here probably
10 already know that. Again, the reuse is an existing -- for
11 use of the existing air installation, as well as other
12 similar uses. The number of residential units, square
13 footage, hotel rooms, those are all consistent with the
14 plan that was generated through the planning process, and
15 is the plan that MRRA is moving forward with.

16 Alternative 2 essentially is the counter plan. If
17 the base was never reused as an air installation, what
18 might be the alternatives? Well, it would be, again, a
19 mixed use of various kinds of commercial, industrial, and
20 residential uses, with a different mix of residential
21 housing units, square footage, and a different mix of
22 recreational opportunities. Again, this plan also is
23 considered in the community reuse planning process.

24 And so these two particular plans, for those who have
25 been through the process, ought to, you know, have some

1 level of familiarity because you've seen these two
2 different plans presented to you before.

3 The third plan, of course, the No-Action Alternative,
4 is kind of unique to the NEPA process. Again, we're
5 required to consider a no-action alternative, essentially
6 hold the property perpetually in a caretaker mode, don't
7 do anything with it. No reuse, no redevelopment would
8 occur. It doesn't meet intended reuse. It doesn't
9 generate the jobs. But we are required to look at that,
10 again, as a way of comparing, if you executed Alternative
11 1 or Alternative 2, how would that compare to doing
12 nothing. So we have to consider the do-nothing
13 alternative, at least as a base point to look at the other
14 alternatives.

15 And again, I mentioned we have many ways for you to -
16 - to provide us comments. All the -- the methods are
17 here. And again, EIS is essentially a document that
18 really will thrive on and be improved by the input that
19 you provide us. So we really do encourage you to come
20 forward with any comments that you have, be it tonight at
21 -- you know, in front of the podium, or by writing, or any
22 of the other methods that we have made available to
23 provide those comments because we really do want to know
24 that the plan we're putting out there has at least
25 attempted to meet what you see as the needs in that.

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1 particular document.

2 And as I mentioned, again, your input does matter,
3 and we'd like to begin now to ask folks who would like to
4 speak and provide their comments to do that. Right now I
5 do have one person who'd like to come up. I'd like to ask
6 Jeanette MacNeille to come up and please provide her
7 comments. Hi.

8 MS. JEANETTE MACNEILLE: Hi. Yes, my name's Jeanette
9 MacNeille. And actually, I -- I'm sorry to say I have not
10 yet read that Draft EIS, although I will make an effort to
11 do so in the next couple weeks.

12 My concern is about the flight path, if this -- if
13 this area is redeveloped and includes the use of an
14 airport. Right now, the -- I -- I live in Topsham. I'm a
15 mile-and-a-half or two miles off the flight path. And
16 when the Navy was in -- you know, flying, it was quite
17 bothersome. I -- I work at home, and so I'm at home all
18 the time, and it -- it was kind of bothersome. And when
19 the Blue Angels came by, it was -- well, actually, you
20 know, I love the Blue Angels. And when the Blue Angels
21 came by, it was so noisy with the jets that I literally
22 had to stop working. And I don't actually mind that once
23 a year because they're so wonderful. But on a day-to-day
24 basis, I just haven't really heard any discussion about
25 how high the planes will need to go if they take off and

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PH001-1

A new figure showing prospective flight paths with roadways
and other landmarks is included in the FEIS (Figure 4.7-2).

PH001-2

A new figure showing prospective flight paths with roadways
and other landmarks is included in the FEIS (Figure 4.7-2).

Text has been added to the EIS in Section 4.7.1.2 presenting
the altitudes of planes operating at the airfield. In general,
following the standard profiles, the civil aircraft would be
approaching the airport at 6,000 feet in elevation and departing
to an elevation of 10,000 feet while the helicopters would be
approaching at 1,000 feet and departing to 1,000 feet.

PH001-1

PH001-2

1 on what kind of a radius they would
2 they would be turning and coming by the houses who are
3 over in Topsham and that kind of thing.

4 So my concern is on two points: Noise, which is
5 bothersome to me, but is also -- there are studies out
6 there showing that it's harmful to children when they're
7 studying in school. And the second thing is on air
8 pollution. I got an -- an email this morning from
9 Efficiency Maine, which said that one out of ten people in
10 Maine have asthma. Anytime you're burning fuel of any
11 kind and putting those particulates and the other kinds of
12 emissions into the air, that's going to be hurting people
13 below who have lung disease. And so I just -- that would
14 be my concern, to have that addressed in the plan.

15 MR. DROZD: Great. Thank you very much. We
16 appreciate that. Now, right now that's -- that was the
17 only card I have right now as far as speakers identified,
18 but we will have folks who -- with cards if you'd like to
19 -- any other speakers, raise your hand, and we can get you
20 a card, so we can, you know, get your name and the
21 spelling of your name for the record. And, you know,
22 please identify yourself if you'd like to speak. Hello,
23 Carol. Thank you.

24 MS. CAROL WARREN: Hello. My name is Carol Warren.
25 I'm a member of the Brunswick Area Citizens for a Safe

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PH001-2
Continued

PH001-3

Noise generated at the airfield was analyzed and presented in Sections 3.7 and 4.7. Under Alternative 1 (with airfield), it was estimated that the majority of noise (using 24-hour average metric) was contained within the air operations land use district. Also, the planes that would operate at the airfield under Alternative 1 are, in general, quieter than the Navy aircraft that previously operated at NAS Brunswick.

Some educational facilities are proposed in the Reuse Plan, although the buildings currently do not exist. It would be recommended that proper sound attenuation would be incorporated into the construction of these buildings.

PH001-4

Air quality emission impacts are presented in the EIS in Sections 3.6 and 4.6. All air emission sources will be required to meet or exceed applicable state and federal air quality regulations and pollution control requirements before operation to prevent exceedances of air quality standards during construction and operation.

1 Environment, and I've been following the environmental
2 restoration program on the base to clean up the Superfund
3 sites. My one comment on the Environmental Impact
4 Statement is that the summary in there is out of date.
5 Now, I understand that the environmental restoration
6 program is a moving target because something is happening
7 every week and every month. This is a very active
8 program. The Navy has been working very hard to get the
9 work done to determine what the contamination is and what
10 needs to be done to clean up these sites. But in
11 preparing the EIS, the consultants did a cutoff of 2008,
12 and as a result, there are many, many statements in there
13 that we know now are incorrect. And I think we at least
14 need to have a footnote and a reference to the
15 administrative record there, to make it clear that
16 everyone reading this today knows that the summary there
17 is already out of date.

18 MR. DROZD: Uh-huh.

19 MS. WARREN: And -- and I will submit some written
20 comments on this, in particular, but it is -- I'm
21 concerned if people refer to this document two years from
22 now, they will think that that's where we are, and we --
23 we have made progress on some of these things. And -- and
24 there should at least be a cross reference to the
25 documents in the administrative record, where we know it's

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PH001-5

Thank you for your comment. Information in the EIS was developed using 2008 as the baseline. It has been noted in the EIS that the Environmental Restoration Program at NAS Brunswick is a continuous program. For more detailed information on the program the reader can visit the web page dedicated to the Environmental Restoration efforts at NAS Brunswick here: <http://nasbrunswick.navy-env.com/index.htm>. The program also upholds an administrative record which can be accessed at the Curtis Memorial Library. This text has been added to the EIS in the introductory parts of Sections 3.5 and 4.5.

1 already out of date.

2 MR. DROZD: Great. Thank you very much. I'd like to
3 call Mr. John Perralt, please?

4 MR. JOHN PERRALT: Hi. My name is John Perralt.
5 Just for disclosure, I'm a Town Councilor here in
6 Brunswick on District 4.

7 And, obviously, we've been sort of involved, you
8 know, in hearing from Commander Fitzgerald and stuff on
9 the base closure, but to be honest it was -- with the
10 implement of MRRR and all that, this was one of the few
11 times lately that I've heard that still no action might be
12 considered to be part of the base closure and that, you
13 know, the government may just hold it and do nothing with
14 it. And that sort of concerns me as, you know, a
15 representative of this town, where there have been a lot
16 of plans and, you know, talk about, you know, the future
17 of this town. And I would have assumed that that decision
18 would have been made and happened a long time ago, that
19 that was still not an option. Thanks.

20 MR. DROZD: The next speaker is Mr. Ed Dailey.

21 MR. ED DAILEY: Thank you. My name is -- I'm Ed
22 Dailey, and I live on -- adjacent to the air station,
23 actually, off Harpswell Road. And what I've -- I'm not
24 really -- I wasn't really concerned too much when the Navy
25 was there, but I am concerned with what will happen next,

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Analysis of the No-Action Alternative is required by NEPA, as
stated in the EIS in Section 2.3.3.

PH001-6

PH001-7

MRRA is the source for information on redevelopment plans. The Navy will continue clean up and information is available through the RAB.

17

1 after the Navy leaves, because I spent a lot of time in
2 the Navy myself as a Navy officer, and I was also involved
3 in -- somewhat, in impact studies on the West Coast, in
4 California and -- when Fort Ord closed, and also NAS
5 Alameda sometime later.

6 But the -- the major concern I had was that there's a
7 certain amount of work effort or work plan after the base
8 closes to keep in touch with what's happening to the
9 environment. Now, in the -- in the Monterey area, the --
10 the major concern was in groundwater because there was a
11 saltwater intrusion that wrecked the -- was raising havoc
12 with the artichoke crop, and also the pesticides that had
13 percolated through the soil had contaminated a lot of the
14 agriculture that was in the Salinas Valley of -- of
15 California, which I -- as a graduate student there, we did
16 a lot of water studies, and the water studies were mostly
17 to find -- find out the residues that still existed from
18 an enormous use of DDT and that type of heptachlor
19 chemicals that were used right after World War II. And as
20 a result of that unrestrained use of chemicals, the
21 farmers out there were having a difficult time keeping
22 their crops at -- at the potential that they should have
23 been at, and it was because they were spending a lot of
24 time just to try to maintain water quality, as well as --
25 the Department of Health for Monterey County was also

PH001-7

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PH001-8

Thank you for your comment.

18.

1 involved, too, because the water being contaminated was
2 causing some illnesses, like phenylketonuria in infant
3 milk, for instance, which would be in -- in the water and
4 you couldn't get rid of it. So, consequently, the
5 groundwater was a major emphasis.

6 Now, here in -- in Brunswick -- I've been here for 30
7 years, and I -- I knew Ferralt's parents in -- in
8 coaching, and I -- I am concerned that -- that an effort
9 is maintained and continues after the -- the base -- the
10 base is closing, and that a good cadre of people make sure
11 that that happens. Now, the universities and the colleges
12 I'm sure will get behind this, and I know the town will
13 get behind it, because we want to keep Brunswick the way
14 it is now and -- and improve it for life in the years to
15 come.

16 I don't have anything else to say, but I just wanted
17 to make sure that that's considered in the impact
18 statement, which I'm quite sure it is, but I -- I wanted
19 to emphasize that, anyway. Thank you.

20 MR. DROZD: Thank you, Mr. Dailey. Are there other
21 speakers that would like to come forward and make some
22 comments, please? Could we get your name for the record?

23 MR. MICHAEL LAVERDIERE: I was looking at a --

24 COURT-REPORTER: Your name, please?

25 MR. LAVERDIERE: Oh, Michael Laverdiere. Sorry. I'm

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1 from Harpswell. I was looking at a report from when they
 2 closed Loring Air Force Base, and one thing that caught my
 3 eye was median values of homes in the area. And when
 4 Loring closed, they specifically tore down a lot of the
 5 base housing so that the median value of the homes in the
 6 area wouldn't decrease. And over a ten-year period after
 7 Loring closed, it showed that by removing the housing, the
 8 homes in the area, their median value went up as a result
 9 of that. And really, I guess my concern here is, are we
 10 really in that desperate need of housing that we have to
 11 keep a lot of the base housing? We need business here
 12 more than we need housing right now, I believe. And
 13 that's just my opinion. That's all I have.

14 MR. DROZD: Thank you very much, sir. Further
 15 comments, please?

16 CAPTAIN FITZGERALD: Can I take this opportunity to
 17 address --

18 MR. PERRALT: Mr. Fitzgerald and Mr. -- can I just
 19 ask, what is the process of having these questions
 20 answered? Thanks.

21 MR. DROZD: As I mentioned, what we're trying to do
 22 is collect those questions and address them in our FEIS.
 23 I know for your particular question, and maybe the
 24 Captain's going to jump on that, and maybe I wasn't clear
 25 in my presentation on what the purpose of the no cost --

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PH001-9

PH001-9
 There are no plans to demolish existing residential units on
 NAS Brunswick. Some units will be renovated/retrofitted.
 Commercial, office, retail and industrial development is also
 proposed under each alternative. Housing prices and potential
 business development are discussed in the EIS in Sections
 3.2.4 and 4.2.1.4 (Alternative 1); 4.2.2.4 (Alternative 2); and
 4.2.3.4 (No-Action Alternative).

PH001-10

PH001-10
 Comments on the DEIS received during the public comment
 period were reviewed by the Navy and considered for the
 FEIS.

PH001-10

1 but I'll let the Captain sort of grab that one.

2 CAPTAIN FITZGERALD: Yeah, I was just going to
3 address your -- your comment about the No-Action. The EIS
4 is not proposing to do any -- or any -- any or all of
5 those actions. It's just -- I look at it as kind of like
6 the spectrum. It's supposed to look at the impact, and
7 looks at everything from the one spectrum of no action
8 happening, and just going cold iron through the spectrum
9 of the preferred action, which is the -- the plan, the
10 reuse plan that MRRA's going to implement. So there's no
11 intention, there's no movement afoot, there's no anything
12 that -- that would possibly result in no action occurring
13 at the base. I don't know if that -- if that alleviates
14 your concern on that or not.

15 MR. DROZD: Yeah. I guess what it -- one of the
16 things that I probably need to clarify, in this particular
17 EIS -- Navy, as I mentioned, is required by the BRAC
18 statute to do an Environmental Impact Statement for this
19 particular base in order to satisfy what's called the
20 National Environmental Policy Act. The various
21 alternatives here, Alternative 1, Alternative 2,
22 Alternative -- and the No-Action Alternative, none of
23 those alternatives Navy's actually going to implement, but
24 we will look at the environmental impacts of each of those
25 alternatives because we're required to by law. But as far

1 as is Navy going to build, you know, the alternatives or
2 the housing or any of the educational or other
3 institutions here? No. Navy's not going to, you know,
4 implement any of those things, but we are required to do
5 and look at the impacts of them. The No-Action
6 Alternative is an alternative that we would have had to do
7 regardless, because it's required by what's called the
8 Council of Environmental Quality Regulations, that we
9 consider that, again, as a baseline. You always look at
10 an alternative compared to something. Alternative 1 we'll
11 compare to Alternative 2, but again, what do you compare
12 Alternative 2 to? You compare it to doing nothing at all.
13 So at least someone has an idea of if you did nothing,
14 this is what would happen; if you implemented Alternative
15 2, this would be what happens; and if you did Alternative
16 1, this would be what happens, so at least to give each of
17 the alternatives a fair look at in comparison to a
18 baseline of doing nothing.

19 Again, as I -- as I mentioned in the -- in the write-
20 up, the No-Action Alternative they require doesn't meet
21 any of the goals, the purpose and need of redeveloping the
22 base, creating jobs, replacing the economic loss that the
23 base closure causes. But again, are we required to look
24 at that? Yes. Will the Federal Government be
25 implementing the No-Action Alternative?. We won't be

PH001-11

Thank you for your comment.

1 actually implementing that alternative or any of the
2 alternatives here, but we will be looking at the
3 environmental impacts of all of them.

4 I hope that clears that up.

5 Oh, Mr. Steve Levesque, please?

6 MR. STEVE LEVESQUE: Good evening. My job is to keep
7 everybody awake with a couple jokes. Just kidding.

8 My name's Steve Levesque. I'm the Executive Director
9 of -- of MRRA, and it's -- it's amazing because you come
10 full circle on some of these things. When I first got a
11 call to write these documents, and I was reading -- as I
12 was reading it, I noticed the template hasn't changed
13 since 1972 on EIS. But -- but I just want to say that I
14 think the document, it's a very thorough document, and I
15 think it reflects accurately the Reuse Plan that the
16 community did as your preferred alternative. So it does
17 reflect the land uses proposed and the growth -- the
18 growth assumed in that Reuse Plan. So I just wanted to
19 give those comments on -- on that, for the record.
20 Thanks.

21 MR. DROZD: Okay. Thank you, Steve. Further
22 comments? I might make mention, as -- as the public
23 notices for this meeting showed, our meeting is, you know,
24 here from 7:00 to 9:00. We're going to be, you know,
25 accepting comments through that period today. There will

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PH001-11

1 also be another public meeting tomorrow. As comments --
2 as you think of comments, you know, please feel free to
3 either submit them to us in writing, come up and speak.
4 We'll be here for, you know, the entire time here today,
5 as shown in the notice, to accept those comments. And
6 again, if anyone has any additional comments or thoughts
7 they'd like to raise, we'd be more than happy to hear them
8 now. Okay.

9 CAPTAIN FITZGERALD: As you leave, again, thank you
10 for coming and for your -- your interest and your
11 participation.

12 (The hearing concluded at 9:00 p.m.)
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C E R T I F I C A T E

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I hereby certify that this is a true and accurate transcript of the proceedings, which have been electronically recorded in this matter on the aforementioned hearing date.

Jo Weiss

Notary Public

My Commission Expires
January 11, 2017

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A-92

PUBLIC HEARING

NOTICE OF AVAILABILITY (NOA)
OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE DISPOSAL AND REUSE OF NAVAL AIR STATION (NAS)

BRUNSWICK, MAINE

June 3, 2010

12:30 p.m.

Town of Brunswick
Parks and Recreation Building
30 Federal Street
Brunswick, Maine 04011

A-93

APPEARANCES:

CAPTAIN WILLIAM FITZGERALD, Commanding Officer, Brunswick
Naval Air Station

DAVID DROZD, Director, Navy Base Realignment and Closure

BERNIE BREITBART, Resident of Brunswick, Maine

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PROCEEDINGS

1
2 CAPTAIN WILLIAM FITZGERALD: Okay. Good afternoon.
3 Can you hear me without that microphone? We're being
4 recorded, so I have to talk, I guess, into both of these.
5 Welcome to the afternoon session for public hearing. For
6 those of you who weren't with us last night, I'll just
7 briefly go over what -- what we're going to do now, and
8 then turn it over to Mr. Dave Drozd. This is the second
9 part of a two-part session. The first part, with our
10 storyboards in the back, hopefully gave you a good primer
11 of what the EIS process is, what the BRAC process is, a
12 little bit about the alternatives. Now, in this public
13 hearing session, we're going to offer you an opportunity
14 to come up to the microphone and make any comments that
15 you want concerning the DEIS. All of this will be
16 recorded for the public record, and your comments will all
17 be addressed or considered for the Final EIS, which
18 hopefully will be out at the -- at the end of the summer.

19 I appreciate you taking time-out of your day, for the
20 few of you that have shown up today, but it is important,
21 so we will be here the -- the whole time this afternoon
22 for anyone who -- who comes in later. We normally have a
23 five-minute limit for speaking, but certainly with the few
24 speakers that we have, at least right now, if you need
25 more time than that, we can certainly be flexible.

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1 With that, I'll turn it over to Mr. Dave Drozd, who's
2 the Director of Navy BRAC PMO, which is the Program
3 Management Office for the Northeast. Mr. Drozd is up here
4 from Philadelphia, and he'll go over some of the ground
5 rules for the public hearing and some more background.

6 MR. DAVID DROZD: Good afternoon, everyone. Again,
7 my name is Dave Drozd from BRAC PMO Northeast. I'd like
8 to go over a few things before we start accepting public
9 comments. I'd like to go over, of course, the -- the
10 rules of the public meeting, how we're going to be
11 conducting this meeting; touch on things like the BRAC
12 timeline, where we stand; talk about, again, in broad
13 terms, the Environmental Impact Statement process and
14 schedule that we have been following and what's the way
15 ahead on completing the EIS process; and also then talk
16 about the various kinds of alternatives within the EIS
17 we're going to be discussing today, as well as talk about
18 the various ways that the public, you folks, can input to
19 that DEIS, or Draft Environmental Impact Statement, to
20 make it, again, as good a document as -- as possible out
21 there.

22 Slide, please? As far as the rules of running the
23 meeting, again, the public hearing format, we're here to
24 hear from any individual, group, elected officials,
25 whoever, who has an interest in this particular action,

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1 who wants to -- has, you know, looked at our document, has
2 an issue, concern, problem with it, to have them identify
3 that -- that problem issue to us, so that we can improve
4 our draft document as we prepare our final environmental
5 document.

6 Again, we talked about comments coming from many
7 sources. All the comments will be coming to -- to the
8 Navy, to our office, as we prepare the EIS. This -- this
9 kind of a meeting, again, is to collect comments. We're
10 not here, necessarily, to have a question-and-answer
11 session. If there's some questions, administrative
12 questions, we might be able to address them, but in-depth
13 questions about the document, we'll take them back, we'll
14 research them, and we'll address them in the Final EIS as
15 it's being prepared. And if you have any lengthy
16 comments, I would ask you to, if you're going to come up
17 and speak -- speak of those -- to summarize those lengthy
18 comments, but if you have those comments in a written
19 form, please given us the written comments, the lengthy
20 written comments, but simply summarize the -- your
21 comments when you come up to the podium.

22 As far as coming up to the podium, what we've asked
23 is if you do like to speak, in order to make sure that we
24 have the -- the speakers clearly identified and the
25 spelling of their names correctly, ask you to fill out one

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1 of these comment cards and indicate that you'd like to
2 speak on that. If you happen to be representing an
3 organization, can you please also identify the
4 organization you happen to be representing? As the
5 Captain mentioned, typically we usually have a five-minute
6 period per speaker, but I think we can allow some -- some
7 flexibility right now on -- on that.

8 And as far as receiving comments, the weight of each
9 comment, be it verbally, be it through email, written
10 comments, all comments will be given equal weight as we
11 prepare -- equal consideration as we prepare our final
12 Environmental Impact Statement.

13 As far as where does this EIS reside, it resides in
14 many -- of course, it resides on the internet, at the
15 website that was identified in the notice that we put in
16 the Federal Register, and the notice that also appeared in
17 the local newspapers. It's located at a couple of local
18 libraries, as well as the Maine Planning Department. For
19 those who have access to the document, who have issues,
20 concerns they would like to raise, again, many ways to
21 submit it, fax numbers, email addresses, regular mail. At
22 the front, as you came in, you'll see email addresses, fax
23 numbers, and -- and regular mail addresses for which you
24 can send comments. I realize certain folks are more
25 comfortable providing their comments other than standing.

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1 in front of a group of folks verbalizing those comments.
2 Again, whatever way you're most comfortable providing your
3 comments, please do so. The important thing is to get
4 your comments in so, again, the Navy can improve its Draft
5 Environmental Impact Statement and make it as good and as
6 inclusive a document as possible.

7 We talked about mentioning the BRAC timelines. A
8 number of these dates here are well familiar to -- to
9 folks here. Of course, in 2005, the decision was made to
10 close the -- the base at Brunswick. In '07 a Reuse Plan
11 was made. That Reuse Plan is -- is very, very important
12 because it was using that Reuse Plan that we were able to
13 have the alternatives that we'll discuss further in this -
14 -- in this presentation, as well as in the EIS. So those
15 are taken from the Reuse Plan and -- and used to -- by us
16 in -- in evaluating the environmental impacts. And the
17 EIS process, we began this EIS process in the fall of '08.
18 We expect to conclude it in the fall of this year. And
19 we'll see on the next slide in a second a little bit more
20 of what the EIS process is about, but again, in 2011, we
21 expect the base to be -- to reach its final closure point.

22 With regard to the EIS process, and for those in the
23 back who may not be able to -- to read this, this
24 particular process and the way the EIS is conducted is
25 kind of -- it's a very prescriptive process; that is to

1 say, the steps, the reports, the various procedures you
2 see here are normally required by either some statute or a
3 federal regulation that says you must do each of the
4 various steps in here. Right now, we are at where it is
5 shown in gold, where the public comments, public hearings,
6 also agency review and comments step. We have already,
7 again, prepared the EIS, we've put out notices that the
8 EIS is available, and are collecting those particular
9 comments, all in the hopes of using those comments and
10 addressing them in the Final EIS shown here. When the
11 Final EIS has been completed, another notice will go out,
12 saying that the Final EIS is -- has been completed, and
13 there'll be an opportunity to provide any -- during the
14 no-action period, any final comments to the document
15 before the Secretary of the Navy issues what's called a
16 Record of Decision. And a Record of Decision is the final
17 act by which to say that the NEPA process, the process of
18 doing the EIS, has been successfully completed, and the
19 Navy has done what it's required to do with regard to that
20 action.

21 I would point out that this particular Environmental
22 Impact Statement is a bit unique. What BRAC requires is
23 that the military services, in this case the Navy,
24 prepares an Environmental Impact Statement for the reuse
25 of the installation. Navy is not the organization who is

1 going to be implementing the reuse. We'll talk about two
2 alternatives here. We'll also talk of what's called the
3 No-Action Alternative. But in none of these alternatives
4 will Navy be the one implementing any of them. Normally
5 Navy does Environmental Impact Statements for actions Navy
6 intends to perform and goes through the same process where
7 Navy is both the preparer of the EIS and the implementer.
8 But in the BRAC scenario, by statute, Navy is required --
9 the military department is required to do the EIS, which
10 we are doing, but again, implementation of it will be done
11 by others.

12 Let's talk a bit about where we are and where we're
13 going to be going. We talked about -- we're in the midst
14 of the EIS. We're holding our public meetings now. I
15 point out on this chart, June 28th, 2010, that is our
16 final day for collecting the comments. The comment period
17 opened at the beginning of May. We would encourage you,
18 again, if you have comments today or will be submitting
19 comments to us by, again, mail, email, fax, please get
20 them in by June 28th, so we can then take those comments
21 and incorporate them into our final EIS document. Our EIS
22 will be completed early in the fall of this year. We
23 talked about there will be a 30-day no-action period, and
24 a notice put out whereby any final comments could be
25 looked at, and a Record of Decision before the end of this.

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1 calendar year, completing the EIS process for the reuse of
2 Brunswick.

3 What are the pieces contained in this particular EIS?
4 I recognize that the EIS is a pretty extensive document,
5 but it has some key pieces that are common to all EISs,
6 again, pieces that are required by statute to be in there,
7 what are the proposed actions, what are the alternatives,
8 what are the environmental conditions and consequences,
9 and the cumulative impacts. I'm not going to get into the
10 details of each of those. The document itself, of course,
11 has lots of details on each of those pieces. Our posters
12 behind you on the wall talk to those various pieces of
13 impacts and existing environmental conditions, and a
14 number of the subject matter experts who helped prepare
15 the EIS are also available to discuss those, as well. So
16 what I'm going to do is talk about, again, those on a --
17 on a pretty broad basis in order to give you an
18 opportunity to provide your comments to the documents,
19 something that we're essentially holding -- the -- the
20 reason we're holding the public meeting.

21 As I mentioned, an EIS must have a purpose and it
22 must have a need. And again, the purpose is -- because
23 we're disposing and the base will be reused, the need to
24 provide, you know, the community with economic
25 redevelopment and job creation...The closure of NAS

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1 Brunswick does put an economic burden on the community, on
2 the region. The Reuse Plan intends to correct those --
3 those economic problems, restore the lost economy, the
4 lost jobs that are caused by the base closure, but Navy
5 will -- but those come with -- the environmental impacts
6 of doing that need to be considered, and Navy is doing
7 that in the EIS process.

8 The Reuse Plan had a number of alternatives
9 initially, winnowed down to two, in their simplest -- most
10 simple form are essentially one that's aviation based, the
11 preferred alternative; the second one is a non aviation-
12 based alternative. Under the regulations that require you
13 to perform the EIS, one of the things that we must do in
14 doing the EIS is do what's called a No-Action Alternative.
15 I'm going to discuss that a little bit more here, on why
16 we have to do it. At the prior meeting, last night, there
17 was some confusion about, well, does the consideration of
18 the No-Action Alternative mean that the Navy is simply
19 going to hold onto the base in perpetuity, nothing's ever
20 going to happen to the base, and none of the reuse is
21 possible? The No-Action Alternative is considered here
22 because it's -- it needs to be addressed as essentially a
23 baseline for comparison to the other alternatives. If all
24 we were required to do was Alternative 1 and 2, then you
25 could only compare those to one another. You need -- for

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1 better perspective, you need to compare them to doing
2 nothing. So we're required by the -- the EIS regulations
3 to do the No-Action Alternative, even though it is not the
4 preferred alternative. It's inconsistent with the Reuse
5 Plan. But in order to have a better basis for comparison
6 between the other two plans, the preferred plan and
7 Alternative 2, we must also address the No-Action
8 Alternative, just like any other ones. And I -- as far as
9 will the No-Action Alternative be the one that's going to
10 go forward? Will Navy keep it, the property, forever?
11 No. But it must be considered in here as an alternative,
12 and -- and we do that, and we'll discuss each of the
13 alternatives in a little more depth here.

14 As I mentioned, Alternative 1 is the preferred
15 alternative, the -- the alternative that reuses the
16 airfield and the infrastructure for commercial,
17 industrial, residential, educational, and -- and
18 recreational other purposes. The various components of
19 the Reuse Plan, including the number of housing units,
20 acreages, and things like that are shown on this slide.
21 This particular graphic is taken from the Reuse Plan that
22 was created by the local community and approved, and we're
23 using that to go forward. Again, details of Alternative 1
24 are shown on the slides -- on the posters behind us, as
25 well as -- and discussed in much greater detail in the

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1 EIS.

2 As I mentioned, Alternative 2 is the non aviation
3 alternative, in which you will see a much more intense use
4 of the other land uses, including residential, commercial,
5 industrial, again, because the land -- the area that would
6 have been aviation related, especially the runways, will
7 now be used for other purposes. And the numbers in here,
8 as far as acreages and square footage, again, are taken
9 from the Reuse Plan that was developed and considered by
10 the local community, and again, described in much more
11 detail both on those poster boards, in our EIS, as well as
12 on the website of the Midcoast Regional Redevelopment
13 Authority. The full Reuse Plan is contained on their
14 website. So we have our EIS on the Navy's website. The
15 full Reuse Plan is available on MRRA's website, if you --
16 if you need to look at that.

17 And as I mentioned, the No-Action Alternatives -- and
18 because what the no action means looked kind of ominous
19 last night, which is why I may be spending a little more
20 time on discussing it, you know, Navy retains -- that's
21 what would -- you have to consider it in doing the
22 planning, but it is not the intention for Navy to retain
23 the property in perpetuity in a -- in a state of suspended
24 animation here. But must we consider it as a basis for
25 comparison to the other alternatives? Yes, and we do, in

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1 the document, and -- to make sure that we have met all the
2 requirements of properly preparing an Environmental Impact
3 Statement for the reuse of Brunswick.

4 Again, I mentioned that our purpose here in gathering
5 is to announce to the folks that we have a Draft EIS, a
6 Draft EIS that we spent a lot of time on, but we recognize
7 that there's probably room for -- definitely room for
8 improvement in certain areas. We'd like the public to
9 look at the document, comment on it, be it either here at
10 the podium, by any of the various means that we have,
11 internet, etc. And your comments are all very, very
12 important to us, but again, fixating on -- we do have a
13 sunset period for public comments of June 28th and would
14 encourage, you know, anyone -- if -- if -- even if you
15 don't intend to speak here today, if you later want to
16 provide comments to us, please keep in mind that June
17 date, and keep in mind the various addresses we have for
18 receiving comments. So we encourage, you know, as many
19 folks as possible to comment on that particular document.

20 And last but not least, as I mentioned, your input
21 does matter. It's very important to us. We want to make
22 sure that anyone with issues, concerns, comments on our
23 EIS has the opportunity to present those issues and
24 concerns to us. We'll do our -- our very best to address
25 them in our Final EIS. But again, a comment that is not

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1 given to Navy, we can't address. So no matter whether
2 your comment is big or small, the only comment that I
3 think is a bad comment is one that is never given to us.
4 So no matter what your comment is, we'd really appreciate
5 hearing from it -- from you on it, and we'll do our best,
6 again, to work it in -- into the Final EIS.

7 And with that, again, I mentioned we have cards for
8 each of the speakers. And what I'd like to do is right
9 now, at this time, call on our first speaker. And our
10 first speaker is Mr. Bernie Breitbart.

11 MR. BERNIE BREITBART: Hi. My name is Bernie
12 Breitbart. I live at 38 Cumberland Street in Brunswick.
13 The first thing that I found a little confusing, but Matt
14 sort of straightened me out, on your Executive Summary on
15 Alternative 2, there's a sentence that states, the
16 alternative does not have an airfield component or -- or
17 aircraft operations, aviation-related business, and
18 professional office land use districts that are included
19 in Alternative 1. I guess I was a little confused by
20 that, thinking there was no professional office space in -
21 - in Alternative 2, but Matt pointed out that there is
22 professional office space. It's just not a whole -- it's
23 just not a whole district that you have. I think the
24 wording could hopefully clear that up a little.

25 I'm mainly concerned about the aviation aspect of the

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Text revised in the EIS to clarify statement regarding the Professional Office land use district under Alternative 2. There is a large "office" component under Alternative 2; however, it is represented in other land use districts (i.e., Community-Mixed Use, Education, and Business and Technology Industries).

PH002-1

1 EIS document. The Navy has been operating -- excuse me --
2 a -- a controlled military airport here for a very long
3 period of time. MRRRA plans to operate an uncontrolled
4 general aviation facility here. The difference between
5 these two types of facilities is night and day. The
6 Navy's airport was overseen by a control tower that
7 directed traffic, told the planes where to fly, when to
8 land, protected the area. Planes could not enter into the
9 airport area or in the area around the airport without
10 getting clearance from the control tower. Everything was
11 very controlled. In addition, experienced pilots flew
12 these planes with -- they were just very well-trained
13 people.

14 In contrast, MRRRA plans to open an uncontrolled
15 general aviation facility. This facility will not have a
16 control tower, which means that there is no one directing
17 traffic in this area. There are also --- any -- all planes
18 can fly into general aviation airports, from very small
19 planes to large four-engine jets. These many different
20 kinds of planes fly different patterns at different
21 altitudes, and it makes the control of them a lot more
22 complicated. Since there isn't a control tower, it is
23 left up to the pilots to direct traffic by themselves.
24 Since the experience level of these pilots can vary
25 greatly, from the greatly experienced professionals to

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PH002-2

PH002-2

The FAA regulations and guidelines for general aviation airports will be implemented at the airfield under Alternative 1.

PH002-3

The FAA regulations and guidelines for general aviation airports will be implemented at the airfield under Alternative 1.

PH002-3

1 total novices, you have a -- you're setting up a case
2 where mistakes can be made, and mistakes lead to
3 accidents.

4 Safety, like I said, is one of my big concerns.
5 Flying is fairly safe. However, general aviation has many
6 more accidents per flight hour than commercial aviation.
7 The fact that we will not have a control tower here is
8 just going to exacerbate the problem that we are going to
9 have.

10 I'm also concerned about the added noise that is
11 going to be generated. I realize the EIS doesn't see that
12 that's going to be a problem. They did not address it in
13 any way. Private planes will be able to fly anywhere over
14 Brunswick. They will be flying at much lower altitudes
15 than the larger planes. There will be no one to direct
16 traffic in any way. I do think that this is going to
17 create more of a noise issue.

18 The other problem we're going to have, quite
19 honestly, is the fact that it's kind of quiet here now.
20 We're going to go through a period of, say, two or three
21 years where it's very quiet, and then all of a sudden it's
22 going to start to ramp up again with planes. It's going
23 to seem noisy. The other thing that's going to happen is
24 the planes will be able to land 24 hours a day. The
25 airport lights are under the control of the individual

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PH002-4

The FAA regulations and guidelines for general aviation airports will be implemented at the airfield under Alternative 1.

PH002-4

PH002-5

Noise generated at the airfield was analyzed and presented in Sections 3.7 and 4.7. Under Alternative 1 (with airfield), it was estimated that the majority of noise (using 24-hour average metric) was contained within the air operations land use district. Also, the planes that would operate at the airfield under Alternative 1 are, in general, quieter than the Navy aircraft that previously operated at NAS Brunswick.

Figure 4.7-2 has been added to the EIS showing flight tracks.

PH002-5

PH002-6

Yes, there would be a quiet period from when the Navy aircraft were realigned (2008) until the airfield is reoccupied (if Alternative 1 is selected). Noise that could be generated at the airfield was analyzed and presented in Sections 3.7 and 4.7. Under Alternative 1 (with airfield), it was estimated that the majority of noise (using 24-hour average metric) was contained within the air operations land use district. Also, the planes that would operate at the airfield under Alternative 1 are, in general, quieter than the Navy aircraft that previously operated at NAS Brunswick.

PH002-6

1 pilots. They can turn them on, turn them off, which means
 2 they can come in and land at any hours, and they can take
 3 off at any hours. If planes decide to fly low, and it's a
 4 lot more noisy, being a resident, who do you complain to?
 5 You can't run out and see the tail number on the plane.
 6 It's dark out. I -- I really don't like that.

7 The other problem, which I sort of noticed here, in --
 8 -- you have -- you have -- in your document, you have
 9 suggested flight patterns that -- from the FAA. These are
 10 not superimposed on any sort of a map. They just -- there
 11 are a lot of patterns and lines and things like that, that
 12 show how helicopters can come in, which is different than
 13 small planes. They show that big planes can come in off
 14 the end of the runway. But we don't know how this relates
 15 to the Town of Brunswick. All we have, for example, on
 16 this one, there's a -- it says Town of Brunswick and
 17 there's an arrow, leading from the Town of Brunswick to
 18 the planes to land. I think the FAA should give us some
 19 idea about where these planes will be allowed to fly, and
 20 if they are, are they going to be allowed to just circle
 21 overhead. Because you have to remember, if we have small
 22 planes that want to enter the pattern, and you have a -- a
 23 big plane coming straight in to land, someone's going to
 24 be circling over here, and that's Brunswick. We've never
 25 had that before. Okay?

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PH002-7

Noise generated at the airfield was analyzed and presented in
 Sections 3.7 and 4.7.

The airfield operator can be contacted for noise complaints.

PH002-8

A new figure showing prospective flight paths with roadways
 and other landmarks is included in the FEIS (Figure 4.7-2).

PH002-7

PH002-8

1 Let's see. Okay. So basically I support plan two,
 2 which calls for development of the base without any runway
 3 component. And I just want to leave you with two other
 4 things, which I found out, which I was not happy with.
 5 This is -- these are FAA rules. If you want to fly an
 6 airplane, you do not have to take a physical. There's
 7 something called a sport license, where if you have a
 8 driver's license, a valid driver's license, that clears
 9 you medically to fly a small airplane. I don't like that.
 10 The second thing is that a small -- a private plane does
 11 not have to carry insurance. If an uninsured plane
 12 damages property, or worse, there is no remedy. Thank
 13 you.

14 MR. DROZD: Thank you, Mr. Breitbart. Right now, I
 15 don't have any other speaker cards, but if there's anyone
 16 in the audience who would like to speak, if you could
 17 please fill out a card. We can provide those cards right
 18 now. And I encourage, again, anyone here who'd like to
 19 speak, please come forward. As -- as the Captain had
 20 mentioned, we'll be taking, you know, verbal comments
 21 between now and 2:30, I believe, and if anyone here would
 22 like to speak, of course, please come up. Otherwise,
 23 we'll -- we'll be here to accept any comments for that
 24 time period. And, of course, I thank you all for -- those
 25 of you who have attended now. And like I said, if you

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PH002-9

PH002-9

Thank you for your comment.

PH002-10

PH002-10

Thank you for your comment. No change in the EIS required.

PH002-11

PH002-11

Thank you for your comment. No change in the EIS required.

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have any comments, please come forward. Otherwise, we'll
still be here for the next couple of hours to -- to listen
to your comments, and appreciate your attending and
providing the comments that you have. Thank you.

(The hearing concluded at 2:30 p.m.)

A-1111

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CERTIFICATE

I hereby certify that this is a true and accurate transcript of the proceedings, which have been electronically recorded in this matter on the aforementioned hearing date.

Jo Weiss

Notary Public

My Commission Expires
January 11, 2017

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A-112

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