

N00129.AR.001516
NSB NEW LONDON
5090.3a

STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON PROPOSED CONTROLLED INDUSTRIAL FACILITY WITH ATTACHMENT
NSB NEW LONDON CT
12/10/1997
CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF LONG ISLAND SOUND PROGRAMS



December 10, 1997

Ms. Nancy Kuntzleman
Department of the Navy
Northern Division, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82, Code 1831
Lester, PA 19113-2090

RE: Proposed Controlled Industrial Facility, Naval Submarine Base, New London, CT

Dear Ms. Kuntzleman:

Thank you for the opportunity to review the Draft Environmental Assessment (EA) as well as a preliminary draft of the Water Quality Certification application for the above-referenced proposal.

First, as staff of this Office have discussed with you, our review for Section 401 water quality certification and consistency with the enforceable standards of the Connecticut Coastal Management Act (CCMA) will begin when we have received a complete application for Water Quality Certification and the supporting documentation for the Navy's determination of consistency with the CCMA. The receipt of the Final Environmental Assessment accompanied by the Finding of No Significant Impact (FONSI) along with the signed application for Water Quality Certification will be sufficient to initiate review. An extension of the state agency review period is necessary to complete the public interest review process and to ensure that the review period does not expire before the process is completed, which would result in a procedural denial of coastal consistency for lack of sufficient information. As you know, the federal coastal management consistency regulations (15 CFR 930.41) allow for alternative time frames to conduct review upon agreement by the state and federal agencies. In this regard, George Wisker has discussed with you and Dick Conant a review period of 60 days from the date of receipt of all materials we deem necessary for issuance of the public notice and this was agreed to. Please be assured that we will make every effort to review this application, once completed and submitted, as expeditiously as possible.

Overall, the draft EA adequately outlines current submarine powerplant maintenance requirements and existing facilities, and analyzes various alternatives both on-base and off. While the elements necessary to justify the construction of the Controlled Industrial Facility at the preferred site are present in the document, additional effort is needed to tie all the elements together. It must be demonstrated that there is a need for this facility, that no other location or building configuration that reduces encroachment waterward of the High Tide Line (HTL) will

work, and that the environmental impacts of the construction and operation at the preferred location are negligible. Presenting this demonstration as a summary chapter based on the information and analyses presented in this draft EA should provide the justification for the project as proposed.

Specific comments on the draft EA are listed below.

Executive Summary- 3rd paragraph, 7th line - "be placed below the water line (731 CY/559 CM) this should be changed to "below the High Tide Line(.....)" and the volume should reflect the amount placed waterward of a vertical plane at the High Tide Line.

Section 1.3 Proposed Action- Please describe why the support area must be on the waterward end of the building as depicted (ie. Could the building be reconfigured to further minimize fill waterward of HTL?) Also pg. 1-7, reconcile volume of placed fill as described above for Executive Summary.

Section 2.0 Alternatives- 2nd paragraph - Should "facilities" be used instead of "activities"; does "activities" equal "facilities"?

Section 2.4.2 Description of Proposed Action - See comments for 1.3 above.

Section 4.1.2.2 Proposed Action, pg. 4-2 - Reconcile volume of placed fill as described above for Executive Summary. Also, describes boring through ramp as opposed to breaking up concrete; please specify correct approach.

Section 4.1.6.2 Proposed Action - Reconcile volume of placed fill as described above for Executive Summary.

Section 4.2.9.4 Proposed Action - Last sentence, should "disestablished" and "reestablished" be used instead of "disestablishment" and "reestablishment", respectively?

Section 4.3.3 Clean Water Act - Sections 401 and 404, pg. 4-17 - Reconcile volume of placed fill as described above for Executive Summary.

Section 4.3.5 Coastal Zone Management Act -pg. 4-18 - This section needs to be expanded to show that while proposed CIF is not water dependent, it is vital to support a major water dependent use; also should indicate that no other location on base with less encroachment waterward of the HTL provides the operating efficiency or functions required. Should also mention that fill is being placed and that resource impacts are negligible or acceptable because of previous development, etc.

Section 6.0 Unavoidable Adverse Impacts and Measures that Offset Those Adverse Effects - Measures under second impact states that concrete will be left intact; current plans show breaking it up. Please specify correct approach. Also given that the concrete

will be shattered how will this affect groundwater flow to the river? Does the groundwater meet surface water quality standards for discharge to the river?

Section 7.0 Proposed CIF is not water dependent; however it is vital to support a major water dependent use. Reconcile this statement with that on pg. 4-18.

Comments on the draft Water Quality Certification application are listed below.

Pg. 5 of 10, part IV, #1. - Please correct the volume of fill to be placed waterward of the HTL per our discussions.

Pg. 7, part IV, #5h. - Management needs to reflect chemical quality of the water as well as turbidity reduction. The Water Bureau [Don Gonyea-(860) 424-3827] has stated that a separate Temporary Authorization for the dewatering activities will be required. Groundwater quality tests for the contaminants of concern found in the test borings performed during 1/97 are necessary to assess the quality of the water planned for discharge during construction.

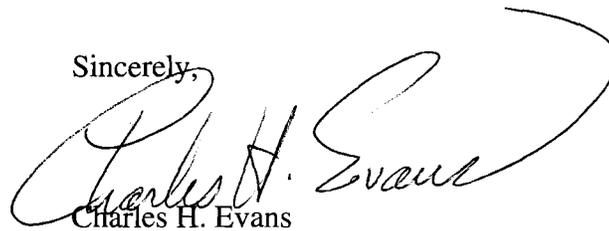
Pg. 7a, part IV, #5f - Will the breaking up of the concrete increase groundwater flow to river? Is groundwater suitable for discharge to the river without treatment?

Pg. 7, part IV, #'s 7&8 - As discussed above under EA comments, detail the need for this facility in supporting a major water dependent use, the need for the particular structure configuration with the associated fill, and the lack of, or acceptability of any resource impacts.

Attachment A: Executive Summary - As discussed above for the executive summary for the draft EA, additional effort is needed to tie all the elements together in a clear demonstration of the need for this facility, that no other location or building configuration that reduces encroachment waterward of the HTL will work, and that the environmental impacts of the construction and operation at the preferred location are negligible.

Should you have any questions, please feel free to contact George Wisker of my staff at (860) 424-3034. Thank you.

Sincerely,



Charles H. Evans

Director

CHE/gw

cc: Jane K. Stahl
Don Gonyea
Dick Conant, SUBASENLON