

## **A Comments on Draft EIS and Responses**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

February 10, 2014

Gregory Preston  
Department of the Navy  
Director, BRAC Program Management Office East  
Attn: Willow Grove EIS  
4911 South Broad Street, Building 679  
Philadelphia, PA 19112-1303

Re: Draft Environmental Impact Statement for the Disposal and Reuse of the Former Naval Air Station Joint Reserve Base Willow Grove, Horsham, Pennsylvania (CEQ #20130375)

Dear Mr. Preston:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the Disposal and Reuse of the Former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove in Horsham, Pennsylvania.

The NAS JRB consists of 909 acres. Three acres will be transferred to the Federal Aviation Administration and 45 acres to the United States Air Force, Horsham Air Guard Station. Following the federal transfers, the remaining 861 acres of installation property was declared surplus and is available for reuse.

The purpose of the proposed action is the disposal of the NAS JRB Willow Grove from federal ownership and its subsequent reuse by the Local Redevelopment Authority (LRA) in a manner consistent with the Redevelopment Plan. The proposed action is needed to provide the local community an opportunity for economic development and job creation. The disposal of the property is the responsibility of the Department of Navy (DON), and the LRA is responsible for the implementation of the Redevelopment Plan. The future developer or owner of the property would be responsible for implementation of mitigation measures and project environmental controls identified for resource impacts associated with reuse.

The DEIS evaluates three action alternatives for reuse of the surplus property and the No Action Alternative. Alternative 1, the Preferred Reuse Alternative, is use of the surplus property

consistent with the Redevelopment Plan, as adopted by the Horsham LRA (HLRA). Alternative 2 is redevelopment of the property with a more dense mixture of land uses. Alternative 3 is redevelopment of the property as an airfield. The No Action Alternative is the retention of NAS JRB Willow Grove by the federal government in caretaker status. Under this scenario, no reuse or redevelopment of the property would occur.

As a result of our review of the DEIS, EPA has concerns with impacts to human health and the environment due to on-site contamination and on-going remedial activities as well as environmental justice, transportation and cumulative impacts. A detailed description of these concerns is presented in the Technical Comments (enclosed) for your consideration. EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of EPA's rating system is enclosed for your information.

Thank you for the opportunity to review this project. EPA would like to extend an opportunity to meet to discuss our concerns with the proposed reuse of the former installation. If you are interested in meeting or have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick  
NEPA Team Leader  
Office of Environmental Programs

Enclosures (2)

## Technical Comments

### Preferred Alternative, Alternative 1

Page 4-5 states, "Full build-out of Alternative 1 would allow for a maximum of 1,486 residential units, 2,337,349 square feet of non-residential floor space, and approximately 240 acres of open space, and natural areas. The total build-out projection includes the reuse of six existing non-residential structures, comprising approximately 91,621 square feet of useable space. The remaining development would be comprised of new residential and non-residential construction. The build-out assumes full occupancy of all structures (over a 20-year period)." Please discuss the six existing non-residential structures to be reused. These buildings should be identified and depicted on a map. Include the historical use of these buildings and what they will be used for as well as any potential environmental impacts related to these structures.

### ENVIRONMENTAL MANAGEMENT

#### Hazardous Waste

Page 3-41 states, "The former NAS JRB Willow Grove property was classified by the PADEP as a Large Quantity Generator (No. PA4170000158)." The DEIS states, "Hazardous waste generated at the former NAS JRB Willow Grove property was generated by aircraft, ground vehicles, and facility maintenance, and included solvents, waste paints, adhesives, sealants, contaminated fuel, rags, and various acids." In addition, "Hazardous waste generated at the former NAS JRB Willow Grove property was accumulated in Building 633 for less than 90 days prior to contractor collection for off-site treatments, recycling, and disposal (Navy 2006)." The DEIS states that, "Hazardous wastes have been removed from Building 633 and RCRA wastes are no longer generated at the installation." Has or will Building 633 be tested for residual contamination before disposal?

#### Radon

Page 3-47 states, "Several radon surveys have been conducted at the former NAS JRB Willow Grove property. Surveys conducted in 1991 were limited to Quarters E in Building 113 and Building 601. The sample collected from Quarters E in Building 113 contained radon at a concentration of 6.9 pCi/L, which is above the EPA action level. Three radon detectors were installed in 1999 as a result of the radon samples collected in 1991. Quarters E in Building 113 was screened twice more in 1999 and 2001; however, the radon concentrations were below the EPA action level (Navy 2006)." Please provide an explanation as to why the radon concentration results were below the EPA action level. Was a mitigation system installed? If not, were proper testing instructions followed or ignored which would skew test results.

0001-1

The text in Section 2 has been updated with a description of the two existing non-residential structures to be reused (the Navy Lodge and the Fire Station), and they are depicted on Figures 2-1, 2-2, and 2-3.

0001-1

0001-2

Building 633 was transferred to the USAF as a federal-to-federal transfer and is, therefore, not part of this EIS. The information pertaining to Building 633 was provided as background to the former RCRA program at the installation. A sentence has been added to Section 3.5.2 referring to the federal transfer of Building 633.

0001-3

Due to the elevated radon concentrations identified in a 1991 Radon screening, a mitigation system was installed in Quarters E (also identified as Building 113) in 1999. Two additional radon screenings were completed for Quarters E in 1999 and 2002, with concentrations of radon below the EPA action level of 4.0 pCi/L. Section 3.5.3.7, Radon, has been updated with this information.

0001-2

0001-3

Page 3-47 states, "In 1999, radon concentrations in buildings 601 were identified as being above the EPA action level; however, no abatement was conducted (Navy 2006)." Please explain why mitigation was not conducted.

Although EPA appreciates that Buildings 113, 137 and 601 were not recommended for reuse under Alternative 1 and would be demolished, EPA questions why actions to mitigate were not taken as well as the method of sampling when attempted as well as validity of results.

Page 4-72 states, "Any available and relevant radon assessment data pertaining to the former NAS JRB Willow Grove property will be included in property transfer documents, in accordance with DOD policy (DOD 1994). However, DOD policy is not to perform radon assessment and mitigation prior to transfer of BRAC property unless otherwise required by applicable law (DOD 1994, 2006)." The Navy will recommend to the developer to conduct radon screenings in any building retained for reuse or constructed in place of Buildings 113, 137, and 601 (areas of radon detection). EPA appreciates the Navy's recommendation to the developer to ensure future safety within buildings.

#### Aboveground Storage Tanks

Page 3-42, Section 3.5.3.2, Aboveground Storage Tanks (AST), and Table 3.5-1: It is important to note that several ASTs were used or contained Aqueous Film-Forming Foam (AFFF). AFFF contains emerging contaminants known as PFOSs and PFOAs. These ASTs have not yet been evaluated at Buildings 80, 177, 183, 650 and 681. Before the ASTs can be closed, they must be evaluated.

#### Pesticides/Herbicides

Page 3-48 states, "Records relating to the actual use, spills, or misuse of pesticides and herbicides at NAS JRB Willow Grove are not available (RKG 2012). However, there is a potential for residual concentrations of pesticides and herbicides from past use."

As stated on page 3-48, "The Redevelopment Plan suggests that additional soil sampling for arsenic may be needed because elevated arsenic concentrations could limit land use, especially in areas with a high risk of ingestion exposure, such as parks and children's play areas (RKG 2012); however, if needed, this would be completed following transfer of the former installation property out of federal government ownership."

Page 3-48, Section 3.5.3.8, Pesticides/Herbicides, mentions that pesticide contamination from past disposal activities is present at IRP Site 3 – Ninth Street Landfill and Site 12 – South Landfill. "Remediation at these two sites is ongoing." This is not true statement. The RI/FS Investigation for both sites is ongoing but a Feasibility Study has not been completed and a remedy has not been selected yet.

Is it not the Navy's responsibility to sample for contaminants prior to transfer? Please confirm who would be responsible for performing additional soil sampling and who would be responsible for cleanup (if needed) once transfer has taken place.

0001-4  
See the response to Comment 0001-5.

0001-5  
Due to the elevated radon concentrations identified in a 1991 Radon screening, a mitigation system was installed in Quarters E (also identified as Building 113) in 1999. Two additional radon screenings were completed for Quarters E in 1999 and 2002, with concentrations of radon below the EPA action level of 4.0 pCi/L. Section 3.5.3.7, Radon, has been updated with this information.

0001-6  
Section 3.5.3.7 also has been updated to clarify that confirmation sampling for Building 137 (in 2001) and the survey for Building 601 (in 1999) showed radon below the EPA action level. The text of the DEIS was updated and clarified with the primary source results. Based on the updated results, no mitigation would have been required.

0001-6  
0001-7  
Thank you for your comment. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

0001-7  
0001-8  
All above and below ground storage tanks were emptied, contents properly disposed, cleaned, and closed. Tank closures were performed by PADEP-certified tank handlers per PA Title 25 regulations. Sentences have been added to Sections 3.5.3.1 and 3.5.3.2 with this information.

0001-8  
Thank you for your comment. The final EIS has been clarified to state that remedial investigation at IRP sites 3 and 12 is ongoing. In addition, Sections 3.5.3.8 and 4.5.1.1 have been generally updated to clarify the existing conditions concerning pesticides and that no other information exists or was available for review. As well, the following sentence has been moved from Section 3.5.3.8 to Section 4.5.1.1 and modified, because it does not apply to existing conditions: "The Redevelopment Plan suggests that additional soil sampling for arsenic may be needed because elevated arsenic concentrations could limit land use, especially in areas with a high risk of ingestion exposure, such as parks and children's play areas (RKG 2012); however, if needed, this would be completed following transfer of the former installation property out of federal government ownership."

Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

Page 4-72 states, "The presence of arsenic at the installation, which is a contaminant of concern in Pennsylvania, could impact land use under Alternative 1." Have all of the soils been tested for arsenic at the installation? Was arsenic tested at only the IRP sites?

### Radioactive Materials Sites

Page 3-49 states, "According to the HRA (historical radiological assessment), radioactive materials were used, stored, and disposed of within the Main Station at the former NAS JRB Willow Grove property. A total of 18 sites are considered impacted from these activities. The HRA has not determined whether radioactive contamination is actually present at these sites; therefore, further investigations are recommended."

The HRA concluded that "low to moderate potential for radioactive contamination" exists at the 18 impacted sites." Page 4-72 states, "Based on the preliminary information for the "potential" for contamination recorded in the HRA, it appears that under Alternative 1, most of the sites with a "likely" or "unknown" potential for contamination occur in areas designed as open space/park/golf course, hotel/conference center/office center, and town center. However, Buildings 80 and 680 are located within areas designed as single-family housing and school space." Page 4-72 notes that the 18 impacted sites have been recommended for a scoping study to determine whether residual radioactive contamination is present. Although an impacted site may be remediated and released as free from residual contamination, the site is not generally reclassified as non-impacted."

EPA is concerned that since a full investigation of these sites has not yet been conducted and preliminary information has been used for site planning to include housing and schools designated for areas with low to moderate potential for radioactive contamination that there is a risk to human health. As noted in the comment for the Protection of Children, it is children that have the greatest risk factor for exposure to contaminants. It would seem that a completion of scoping surveys and remediation would be in order prior to designation of reuse. Without this information, it does not seem prudent to build family housing and a school within these areas.

Page 3-49: The 18 Impacted Sites identified by the HRA need to be depicted on all of the Action Alternatives figures.

Figures 2-1, 2-2, and 2-3 (maps of action alternatives 1, 2 and 3) should include an overlay of all the Installation Restoration Program (IRP) Sites and Historical Radiological Assessment (HRA) Sites (Potential Impacted Sites/Buildings for Radiological Assessments). This would help in the risk evaluation for each of the impacted sites and IRP sites related to the future reuse. Active remediation sites such as IRP Site #5 (Fire training area) should also be included.

Alternative 1 and 2, have reuse areas designated for a school. In that same parcel are three potential radiological impacted sites. It cannot be assumed that the radiological impacts sites are clean until the assessments are completed.

0001-9  
See the response to Comment 0001-8.

0001-10  
The Navy is beginning radiation scoping surveys for the 18 sites identified in the HRA, as indicated in Sections 3.5.3.9 and 4.5.1.1. As well, Section 4.5.1.1 for Radioactive Materials Sites has been updated with the following: "Under Alternative 1, the locations of future residential and school areas would continue to be evaluated pending the results of the radiation scoping surveys and other steps in the continuing CERCLA investigation and remediation process."

Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

0001-11  
The 18 Impacted Sites identified by the HRA were added to the action alternative figures in Section 4 (Figures 4.5-1, 4.5-2, and 4.5-3).

0001-12  
IRP sites are shown on Figures 4.5-1, 4.5-2, and 4.5-3. HRA-identified sites have also been added to these figures, respectively. The IRP sites and HRA-identified sites were not included on Section 2 figures as resource areas have not been introduced yet.

0001-11  
0001-13  
See the response to Comment 0001-10. Also, note that, under Alternative 2, the potential radioactive materials sites are not situated in future residential or school areas with the exception of a small portion of IRP Site 12 that slightly overlaps an area designated for apartments/condominiums.

0001-13



Section 3.5.1: Add a section that describes the Historical Radiological Assessment process and the assessment of the impacted sites/buildings (part of Navy's program).

Any of the areas identified for future residential reuse must be evaluated for human health risk.

Figure 3.5-2, IRP Sites: The IRP sites need to be labeled with a greater contrast so they can be seen in relation to the aerial photograph background.

### Environmental Restoration Program

As noted in Table 3.5-6, Current Status of IRP Sites, Site No. 1, the Privet Road Compound, is still under investigation for off-site contamination of groundwater, even though the 2008 interim ROD selected land use controls. The site is located on the property to be transferred to the Horsham Air Guard Station. However, because the investigation is still underway for off-site contamination of groundwater, please discuss the potential impacts/risks to the adjacent housing development planned under the Preferred Alternative. Can the results of the investigation affect proposed reuse of nearby areas?

Table 3.5-6 indicates that Site No. 3, Ninth Street Landfill, is in the process of an RI/FS. Please discuss how the results of the RI/FS could impact reuse. It appears as if Site No. 3, under the Preferred Alternative, is to be designated as a park. It is suggested that the Navy recommend precautions for park users and possible signage to disclose the history/previous use of land.

Table 3.5-6 indicates that Site No. 12, South Landfill, is in the process of an RI/FS. Page 4-74 states, "Remedial activities at the landfills at Sites 3 and 12 are on-going and there will be land use constraints from future development." The reuse proposed under the Preferred Alternative, is the proposed Town Center, park, and office park. Please discuss if the results of the RI/FS could possibly alter reuse planned and if future users will be made aware of historical contamination of the site and/or the type of mitigation/land use constraints necessary for development.

Page 4-77, Integration of Constraints with Reuse Alternatives, mentions planning concepts incorporated into the Preferred Alternative to minimize the impacts of IRP sites on human health and the environment. One constraint is to minimize residential development in areas with known environmental contamination. Should any residential development be planned in areas of known environmental contamination, especially if some sites are still under investigation and/or remediation? Will disclosure of contamination be made know to potential homeowners? Another constraint is to minimize the number of structures in areas with known VOC contamination to maintain indoor air quality and reduce risks to human health. Again, will there be disclosure of contaminants to users of the buildings, etc.? Will there be periodic monitoring of buildings to ensure indoor air quality is safe for users? According to page 6-4, "No long-term monitoring has been found to be applicable for the alternatives presented in this EIS." Should there be at a minimum, a follow-up test to ensure quality of the indoor air is safe after abatement is complete?

0001-14  
The Historical Radiological Assessment is already described in Section 3.5.3.9. Some additional detail has been added to this section.

0001-15

0001-15  
See the response to Comment 0001-10.

0001-16

0001-16  
Figure 3.5-2 has been revised for clarity.

0001-17

0001-17  
Table 4.5-1 already notes that "Development at site and above contaminated groundwater plume [will be] subject to land use controls and other constraints."

0001-18

The future property grantee will be informed of the potential of non-Navy off-site groundwater contamination. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

0001-19

0001-18  
Thank you for your comment. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

0001-20

0001-19  
Thank you for your comment. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

0001-20

Thank you for your comment. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The

FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

A paragraph has also been added to Section 6.3, Monitoring, clarifying that any future monitoring required for former IRP sites will be addressed under the CERCLA process and noted in the FOST.

It is also mentioned on page 4-77 that, "Development of the transportation system, including pedestrian trails, could impact the IRP sites." Public awareness should be an important component in the redevelopment plan. EPA suggests signage along trails, etc. to promote public awareness.

### PCBs

Page 4-71 states, "As discussed in Section 3.5.3.6, all PCB-containing transformers and equipment formerly located at the installation were reportedly removed in the late 1990s (Navy 2006); however, no record of these removals is available. PCB soil contamination was addressed at IRP Site 1 – Privet Road (refer to Section 3.5.3.6)." If there are no records of all PCB-containing transformers and equipment removed, how can the Navy be certain that the equipment was removed? Is there a plan to evaluate the properties to ensure that all PCB-containing transformers and equipment are no longer located at the installation? Have soils been screened for PCB contamination?

### Soils

Page 4-131 states, "Alternative 1 would include approximately 220 acres of residential land use, 260 acres of commercial land use, and 310 acres of other land uses including open space and recreation.

The DEIS does not adequately address the condition of the soils on the installation considering the history of contamination on the site. Even for those sites with known contamination, it is not clear as to the treatment of the soil. For instance, Page 4-72 states, "The presence of arsenic at the installation, which is a contaminant of concern in Pennsylvania, could impact land use under Alternative 1. The concentrations of arsenic detected in most soil samples collected in IRP Site 7 in 2008 exceeded the risk-based concentration but were within background levels for soil (Tetra Tech 2012b)." Reuse for Site 7 under the Preferred Alternative consists of both a park and single family housing. Will the arsenic be removed as the potential for contact is possible considering reuse of a park and housing are proposed where people will be exposed? Please explain. Please discuss if soils have been tested for arsenic and where. Was arsenic tested only at the IRP sites?

### Prime Farmland

Page 3-45 states, "Approximately 234 acres of the former installation property have prime farmland soils or farmland of statewide importance." In addition, "While prime farmland soils and farmland of statewide importance on the property have the potential to be farmed, the surrounding uses are not particularly compatible with such activity." Prime farmland impacted by the Proposed Action should be delineated regardless of the current state of cultivation. These efforts should be coordinated with the Soil Conservation Service. Impacts to prime farmland should be avoided. However, if this is not possible, the EIS should explain the implications of developing the prime agricultural land with respect to the Farmland Protection Policy Act as well as describe the mitigation measures for those impacts. Although it may have been understandable that the prime farmland would not have been used by the former installation

0001-21 0001-21  
Thank you for your comment. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

0001-22 0001-22  
The phrases "no documentation exists" or "no record of these removals is available" have been removed from Sections 3.5.3.6 and 4.5. The ECP report and the personnel at the installation confirm that PCB-containing materials were removed by the late 1990s. Other than the soils investigated at IRP Site 1 - Privet Road Compound and Site 3 - Ninth Street Landfill, no other soils at the base are known to have been tested for PCBs.

0001-23 0001-23  
Sections 3.5.3.8 and 4.5.1.1 have been updated to clarify the existing conditions concerning pesticides/arsenic and that no other information exists or was available for review. IRP Site 7 received a No Action consensus agreement in 2008, which was informed by a human health risk screening that found concentrations of arsenic in soil above EPA Region 3 risk-based concentrations but within background levels for soil. Regarding the last sentence of the comment, as far as is known, information on arsenic in soil is available only for certain IRP sites (and a summary of that information is included in the EIS) and not for other areas of the property.

Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

0001-24 0001-24  
It is assumed this comment pertains to text on Page 3-95 of the Draft EIS. The text indicates that "prime farmland" and "farmland soils of statewide importance" are delineated on Figure 3.10-2. The source of this information is the Natural Resources Conservation Service (formerly the Soil Conservation Service).

Additional information has been added to the text within Sections 3.10 and 4.10 that specifically addresses development of prime farmland within the former installation and mitigation of impacts in the context of the Farmland Protection Policy Act (FPPA).

when operable, the HLRA could address prime farmland soils and incorporate it into its plans. Please discuss.

Page 4-7 states, "Full build-out (of Alternative 1) could have the beneficial indirect effect of preserving natural open spaces and agricultural areas from being developed as further demands for housing and commercial space could be met by redevelopment of the installation. Please quantify the agricultural areas to be preserved from development.

### Stormwater

Page 3-81 and 3-82 state, "In 2001, NAS JRB Willow Grove applied for and received an NPDES permit from U.S. EPA Region 3 for stormwater that drains into Little Neshaminy Creek, Pennypack Creek, and Park Creek through the Commonwealth National County Club. The NPDES permit (No. PA 0022411) had a term of 5 years and expired on 7 December 2006 (Navy 2006)." Why was the permit left to expire in 2006 when closure of the installation occurred in 2011? Please explain.

Page 4-114 states, "Under Alternative 1, impervious surface areas would cover approximately 352 acres of 41 percent of the total 861 acres of the property." In addition, "The projected 352 acres of impervious surface area would be an increase of 103 acres (or 12 percent) over the existing impervious surface." Section 6, Best Management Practices, Mitigation, and Monitoring, references excellent stormwater control practices through low impact development (LID). There are additional practices, however, not mentioned that will help to promote water infiltration (i.e., incorporating pavers in place of asphalt, green parking design, etc.). For more detailed information, please refer to the following web site: [http://www.epa.gov/oaintrnt/stormwater/best\\_practices.htm](http://www.epa.gov/oaintrnt/stormwater/best_practices.htm).

### Wetlands

Page 4-139 states, "Redevelopment under Alternative 1 would have the potential to directly impact 13 wetlands encompassing approximately 7.0 acres."

As noted on pages 3-108 and 3-109, the wetland assessment involved a desktop analysis of baseline wetland information and on-site survey. "The USACE did not make a jurisdictional determination confirming the wetland boundaries, as they are being used for planning-level analysis specific to this study." However, "Based on the results of the desktop analysis, specific areas of the former installation property were targeted for field verification and delineation from April 1 through April 6, April 30 through May 3, and May 12, 2013." As a result of the field surveys, a total of 23 wetlands, totaling 25.96 acres were identified. Since the field study looked at sample sites and a jurisdictional determination confirming the wetland boundaries was not conducted, can it be assumed then that the size of the wetland areas may differ from that which is presented in the DEIS? Is there a potential to have an even greater wetland impact? Please explain. EPA understands (as noted in Appendix F) that "A jurisdictional determination will need to be conducted by a developer prior to any redevelopment of the installation property." Why did the Navy decide not to request that the USACE make a jurisdictional determination to confirm the wetland boundaries? This is pertinent information in the transfer process and in

0001-25

As noted in Sections 3.10 and related to the response to Comment 0001-24, the prime farmland and farmland of statewide importance within the former installation property are not covered by the Farmland Protection Policy Act (FPPA) as they are in urbanized areas per the Census Bureau. Since these areas are not covered by the FPPA, they are not quantified.

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0001-26

Section 3.8.3.2 has been updated to include documentation that the NPDES Permit No. PA0022411 was extended through 2011. NAS JRB Willow Grove closed its waste water treatment plant on August 15, 2011. After September 15, 2011, the Navy land was held in caretaker status and, since that date, there have been no industrial discharges associated with the outfalls on the property.

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0001-27

Additional practices to help promote water infiltration have been added to the list of mitigation measures under Infrastructure and Utilities in Section 6, Best Management Practices, Mitigation and Monitoring.

0001-28

Text in Section 3.11.5.2 was revised to clarify that the on-site survey encompassed the entire property.

0001-28

A jurisdictional determination is the responsibility of the developer upon determining their final design for the districts at the former installation. For the purposes of satisfying NEPA and presenting an analysis in the EIS, a planning-level wetland assessment was performed to identify wetland locations and to quantify their size. The wetland assessment was performed on the entire property, not just at sample sites. The on-site wetland assessment identified more than 11 acres of additional wetlands than were identified during the desktop analysis and is a comprehensive assessment of the wetlands on the property.

In addition, a jurisdictional determination is valid for five years. The Navy's wetland assessment was performed in spring 2013, and therefore, the developer would most likely require a jurisdictional determination during the 20-year build-out of the site. The information presented in the EIS can inform the HLRA and the developer of the location and size of wetlands to assist in their final design of building locations and to avoid wetlands to the greatest extent possible. The HLRA's Redevelopment Plan states that "The report concludes with the final preferred land use plan, which captures the general land vision for the property." Therefore, the specific locations of buildings and other infrastructure can theoretically be shifted within the property to avoid or minimize potential impacts while preserving the land vision for the property in terms of the mix of land uses and level of development.

preservation of wetlands during the planning for redevelopment? Impacts to wetland should be avoided or minimized whenever possible.

Page 4-139 states, "The use of pesticides and fertilizers on the golf course could also result in indirect impacts on the wetland complex. However, it is expected the developer would implement an integrated pest management plan and/or a nutrient management plan to mitigate potential impacts from pesticides and fertilizer used on the golf course. In addition, the developer should consider a LID golf course, which would emphasize the conservation of natural landscape features, including wetlands, and thereby mitigate potential environmental impacts." In addition, it is suggested that buffers should be required around wetlands. It is recommended that the Navy includes these recommendations in the property transfer documentation. There is no mention of these suggestions in Section 6, Best Management Practices, Mitigation, and Monitoring.

Page 4-140 states, "Specific mitigation requirements for future development projects at the former installation would be determined in coordination with the USACE and PADEP." Coordination should also include EPA. In addition, EPA questions that if USACE conducted a jurisdictional determination of wetlands prior to transfer, then wetland avoidance, minimization and mitigation could have been incorporated into the site planning.

**Vegetation/Threatened and Endangered Species**

Page 4-159 states, "Under Alternative 1, proposed construction could result in the long-term loss or alteration of approximately 68 acres (54 percent) of currently undeveloped land at the former installation (Table 4.12-1)." Of the 68 acres, 44.24 acres consist of deciduous forest, 10.13 acres of pasture/hay, 5.53 acres of emergent herbaceous wetland, 4.36 acres of grassland/herbaceous/ and 2.09 acres of shrub/scrub. It is understood that mitigation for wetland loss will be coordinated with the USACE and PADEP. The redevelopment plan should have addressed mitigation for other vegetative loss, especially for loss of forest.

As previously stated on page 3-122, "the PFBC indicated that a species of concern is known from the vicinity of the former installation. Unfortunately, the species of concern was not identified. It is imperative to know which species is of concern to determine the full impact of vegetation loss and whether areas of impact can or should be avoided or minimized. Has there been any further attempt to communicate with the Pennsylvania Fish and Boat Commission to identify the species of concern? It is recommended that the Navy work with the PFBC to avoid and minimize impacts to species of concern.

**Protection of Children from Environmental Risks and Safety Risks**

The DEIS did not adequately address the environmental risks to children who may live and play on the former installation. Page 4-24 states, "When the percentage of the population that is either minority/low-income or under the age of 18 years within an affected area exceeds 50 percent or is "meaningfully greater" than the minority or low-income population percentage of the community of comparison, that population could potentially experience a disproportionately high and adverse effect." It is important to note that Executive Order 13045,

0001-29  
BMPs and mitigation measures discussed in Section 4.11.1.5, Wetlands, were added to Section 6, Best Management Practices, Mitigation, and Monitoring. In addition, recommendations and/or precautions related to the property would also be included in the FOST, deed transfer, and/or CERCLA process, as applicable.

0001-30  
The EPA has been added to the list of agencies to coordinate with regarding wetlands in Sections 4.11.1.5, 4.11.2.5, and 4.11.3.5.

0001-31  
The Redevelopment Plan did not address mitigation for other vegetative loss (including loss of forest). The potential vegetation impact noted in the EIS is considered the maximum impact, as no specific site plans have been developed. Additional language has been incorporated into the EIS (Section 4.12) that it is recommended that the developer work with state agencies to design the final location of buildings to minimize the impact to forested areas, to the extent practicable. In addition, language regarding revegetation with native species was added.

0001-32  
0001-31  
The Navy has coordinated with the PFBC, and they submitted a letter on the Draft EIS dated January 27, 2014, stating they had no further comments on the EIS. A copy of this letter has been provided in Appendix B of the Final EIS. Additional text regarding the PFBC response was added to Sections 3.12.3, 4.12.1.5, 4.12.2.5, and 4.12.3.5.

0001-32

“Protection of Children from Environmental Health Risks and Safety Risks,” requires each federal agency to make it a high priority to identify and assess environmental health and safety risks to children that may disproportionately affect children to ensure that policies, programs, activities, and standards address disproportionate risk to children that result from environmental health or safety risks. Children are disproportionately more susceptible to environmental factors encountered on the former installation than adults. With the reuse plan proposed, more children will be directly exposed to environmental conditions on the former installation as a result of housing, school, and recreational activities planned.

More specifically, the Executive Order recognizes that some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to environmental health and safety risks. Children may have a higher exposure level to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Children also exhibit behaviors such as spending extensive amounts of time in contact with the ground and frequently putting their hands and objects in their mouths that can also lead to much higher exposure levels to environmental contaminants. In addition, a child’s neurological, immunological, digestive, and other bodily systems are also potentially more susceptible to exposure related health effects. It has been well established that lower levels of exposure can have a negative toxicological effect in children as compared to adults, and childhood exposures to contaminants can have long-term negative health effects. Examples include life-long neurological deficits resulting from exposure to lead, mercury and other metals, and the increased susceptibility to particulate matter and other asthma triggers in the environment.

It is well documented that children are more susceptible to many environmental factors than adults, including exposure to mobile source air pollution, particulate matter from construction or diesel emissions and lead and other heavy metals present in construction and demolition debris or mining waste. It is recommended that an analysis of potential impacts to children be included in the FEIS if disproportionate impacts on children caused by the proposed action are reasonably foreseeable. Childhood exposures at each life stage, including those experienced via pregnant and nursing women, are relevant and should be considered when addressing health and safety risks for children.

The DEIS did not discuss potential risks to children based on known contamination on-site and potential exposure based on reuse of the site. It is recommended that the environmental document provide an assessment of potential exposures and susceptibilities to pollutants of concern for children.

As page 4-36 states, “Alternative 1 calls for the transfer of approximately 40 acres to the Hatboro-Horsham School District, which would construct a new middle school at the site, along with administrative and recreational facilities.” In addition, Alternative 1 would add approximately 270 acres of new recreation and open space land where children may be exposed. It is imperative that reuse of the land is safe for children. Please discuss environmental impacts of the former installation’s contamination and its potential impact on children, especially on sites designated for the new school, housing and recreational areas.

0001-33

0001-33

Thank you for your comment. The Navy agrees with and acknowledges the importance of protecting children. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

Further, sentences have been added to Section 4.2.1.5 referencing Section 4.5, which establishes that human health and the environment would be protected with respect to hazardous substances, wastes, or materials associated with former IRP sites, radioactive materials sites, and other past and future activities because the Navy, future developer, and future occupants would be required to follow strict regulatory requirements that take into account past and future uses of the land. As a result, there would therefore be no significant environmental impacts from hazardous substances, wastes, or materials. Accordingly, potential environmental health or safety risks to children from hazardous substances would be addressed by the CERCLA process for remedial sites, and potential risks from other hazardous wastes and materials would be addressed by the applicable regulatory requirements.

0001-34

See the response to Comment 0001-33. In addition, Section 4.5 addresses the proposed uses of the land under each alternative and reuse constraints (such as land use controls) that would apply to certain former IRP sites.

Accordingly, potential environmental health or safety risks to children from hazardous substances would be addressed by the CERCLA process for remedial sites, and potential risks from other hazardous wastes and materials would be addressed by the applicable regulatory requirements.

0001-34

### Cultural Resources

Page 4-128 states, "The Navy has evaluated the effects of the impacts of Alternative 1 on historic properties in accordance with Section 106 of the NHPA and is proposing that potential adverse effects on the two archaeological sites (sites 36 Mg 0459 and 36 Mg 0460) that the Navy is treating as NRHP-eligible historic properties would be mitigated by covenants and deed restrictions with the property recipients. These covenants and deed restrictions would require property recipients to conduct evaluative testing of these two sites to determine their NRHP-eligibility. The FEIS should indicate where these two NRHP-eligible sites are located in relation to the Preferred Alternative.

### Mobile Air Sources

Page 4-91 states, "Further analysis should be conducted by the developer once final roadway design is complete and prior to road construction to assess air quality impacts at specific intersections." It is assumed that the Navy will make this suggestion in the property transfer documentation. Please confirm.

### Transportation

The project is likely to have significant and unavoidable transportation impacts at the intersections studied within the project area. Due to the delays and anticipated level of service (LOS), almost all of the intersections studied will require mitigative measures. It is not clear that the potential impacts of these mitigative measures were analyzed in the EIS. EPA is concerned that there may be additional adverse impacts that were not analyzed or documented. Also of concern is the limited number of intersections studied in the transportation analysis, and the concern that there are likely additional intersections that will be adversely affected by the proposed alternatives. Specific comments are as follows:

- Page 3-31- It would be helpful to provide a map showing where the Congestion Management Process Corridors overlap with the study area.
- Although the proposed roadways within the base are not fully designed and characteristics are uncertain at this time, it would be helpful to add some discussion of projected internal roadway functions and intended LOS. During final design, consider modifications that will improve internal roadway and additional access points, to alleviate congestion, wait times and improve LOS.
- Despite many of the studied intersections in the No Action Alternative already being projected to operate at LOS F, the increases in number seconds delayed for the Preferred Alternative over the No Action Alternative is significant, many delay times being increased by greater than 2-3 times, and as many as 5 times greater than the No Action Alternative delay times. Page 4-50 makes the assertion that most of the increase in traffic volume seen in Alternative 1 is due to background projected growth. EPA would disagree with this assertion, as it does not seem to support the provided data and conflicts with the statement made on Page 4-65 which asserts that each build alternative would result in significant and unavoidable impacts, but the degree of impact would be greater in Alternatives 1 and 2 than in Alternative 3. EPA would agree that the build

0001-35

To protect NRHP-eligible archaeological sites, their locations are typically not depicted in public documents, such as this EIS. However, a figure showing the locations of these two NRHP-eligible sites has been provided to the HLRA in order to coordinate with the developer and the SHPO regarding future development.

0001-35

0001-36

The Navy typically does not include the suggestion to analyze air quality impacts in the property transfer documentation because it is covered by local laws.

0001-36

0001-37

Section 4.4 of the EIS presents transportation impacts both with and without mitigation for all three action alternatives.

For each alternative, the first table provides overall trip generation by land use category. This is followed by a table presenting the peak hour trips by intersection. Then the LOS is presented by intersection without mitigation, followed by the LOS with mitigation.

0001-37

In addition, in the comment letter received on the Draft EIS from PennDOT, they suggested the addition of the intersection of Easton Road (SR 611) and Maryland Road to the analysis. This has been incorporated into the Traffic Assessment Study, as well as Sections 3.4 and 4.4 of the Final EIS.

0001-38

A new figure (Figure 3.4-1, Congestion Management Process Corridors) has been added to Section 3.4.1.

0001-39

0001-39

The internal roadways depicted for the three redevelopment alternatives are conceptual in nature, and the developer will use the information contained within the EIS and additional studies to determine the most appropriate internal roadway network. For the purposes of the EIS, an "internal capture rate" was utilized to account for vehicle trips that were contained within the former installation property (e.g., driving from a new residential house to the school or Town Center). The planning for and construction of these roads would follow the local site planning process and will be built to sufficient capacity to account for the proposed developments. Therefore, the EIS did not model any improvements or mitigation measure to roads that currently do not exist.

0001-40

0001-40

Text in the EIS has been revised to clarify and more accurately describe

the component of traffic volume attributed to background growth and the proposed redevelopment, and also notes that it varies by intersection. It is noted in Section 4.4.1.2 that Alternative 1 would result in a significant and unavoidable impact.



alternatives, especially the Preferred Alternative, Alternative 1, could result in significant transportation impacts.

- Potential mitigative measures for Alternative 1 are discussed on Page 4-53. Due to the extent of projected transportation impacts associated with the build alternatives, it would be prudent to include additional detail about these measures in the FEIS. Please clarify if these same measures are proposed for each of the build alternatives, and explain the potential for mitigative or corrective measures to be conducted to address the No Action condition. The EIS states that mitigative measures would be required by PennDOT. Please clarify if the implementation timing of proposed measures will coincide with the redevelopment activities or will be implemented at some later time. EPA also suggests that any draft figures of mitigative intersection and lane configurations be included. Also clarify which party may ultimately be responsible for constructing these mitigative measures, for example PennDOT, a private developer, or the HLRA. Since it appears that these mitigation measures are a required aspect of the project, the potential environmental and socioeconomic impacts should also be analyzed either in the FEIS or in a separate document. Since lane additions and roadway widening has the potential to require additional Right of Way, to impact private properties and businesses, and to impact wetlands or streams through culvert extension, relocation, or permanent fill, it is recommended the potential impacts of mitigation measures be included in the environmental consequences section of the EIS. It is difficult to assess potential project impacts if not all project components are included in the analysis. Also, please clarify if the wetland and stream delineation report included areas that overlap with proposed mitigative measures, including within existing Right of Way or necessary areas outside of the Right of Way. The analysis of these measures is not currently included in the indirect and cumulative impact analysis included in the document. It is recommended that as the implementation of these measures are reasonably foreseeable actions, at a minimum, they should be included in the cumulative impact analysis.
- EPA questions whether additional intersections should be included in the analysis, as the intersections that were studied overwhelming showed that the potential for significant transportation impacts. It may be likely that there are other adjacent intersections that will also be affected by the proposed alternatives, which may also necessitate mitigative measures.
- A discussion of SEPTA public transportation in the study area was included in Chapter 3 of the EIS, however there was no discussion of potential impacts of the proposed alternatives on public transportation/SEPTA in Chapter 4. EPA suggests including some analysis of potential impacts to SEPTA routes/lines in the study area.
- A discussion of safety and study area crashes were included in Chapter 3 of the EIS, however Chapter 4 did not assess the potential impacts of the action alternatives on safety and crashes. We recommend that this information be addressed in the FEIS.
- Cumulative analysis of transportation did not include any detailed analysis or traffic projections. Based on the information provided, it is unclear if any of the action alternatives and associated mitigative measures in combination with any of the past, present or reasonably foreseeable projects would have adverse effects on transportation. It would be helpful to include whether any additional transportation mitigative measures are reasonably foreseeable with the projects listed in the table. This would allow the identification of areas or resources that could be impacted by multiple projects. Any such

0001-41

The mitigation measures proposed would apply to all three build alternatives evaluated in the EIS. Overall, improvements to the roadway infrastructure are needed to address traffic increases related to background growth, as well as the redevelopment alternatives. To further describe and depict some of the mitigation measures, Figure 4.4-3 has been added to Section 4.4, which summarizes some of the major mitigation measures. Some of the major improvements, such as road widening for Horsham Road and Easton Road, are necessary improvements to accommodate the projected growth in traffic. Accordingly, the scope of these projects requires local agencies (including but not limited to PennDOT), developers, and the HLRA to begin planning and budgeting for the implementation of these projects, as larger projects require a longer planning horizon.

0001-41

0001-42

In the comment letter received on the Draft EIS from PennDOT, they suggested the addition of the intersection of Easton Road (SR 611) and Maryland Road to the analysis. This has been incorporated into the Traffic Assessment Study, as well as Sections 3.4 and 4.4 of the Final EIS.

0001-43

A subsection for SEPTA has been included in Section 4 that corresponds to the existing information presented in Section 3. This includes information on what transportation needs would be handled by SEPTA resources.

0001-42

0001-44

A subsection for safety has been included in Section 4 that corresponds to the existing information presented in Section 3. This includes an estimate of changes in accidents and safety within the study area under the three build alternatives.

0001-43

0001-44

0001-45

Additional language has been added to Sections 4.4 and 5.4.4 that discusses the assumed background growth in the region related to the projects evaluated for potential cumulative impacts.

0001-45

0001-46

The Navy has coordinated with PennDOT regarding the EIS.

area identified may highlight locations where there could be multiple impacts to the same resources, which could guide and inform project mitigation and become focus areas for avoidance and minimization of impacts.

- Coordination with PennDot is recommended.

| 0001-46

### Environmental Justice

In Section 4.2.1.5 Environmental Justice and Protection of Children: The second paragraph reads as follows, “Demographic and economic data for all census block groups that are adjacent to or wholly or partially within the former installation were compared with similar countywide demographic and economic data to determine whether the proposed action could have disproportionately high and adverse effects on minority or low-income populations or on children. When the percentage of the population that is either minority/low-income or under the age of 18 years within an affected area exceeds 50 percent or is “meaningfully greater” than the minority or low-income population percentage of the community of comparison, that population could potentially experience a disproportionately high and adverse effect.”

It should be noted that the CEQ citation reads as follows: “Section 1-1. IMPLEMENTATION. 1-101. Agency Responsibilities. To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Marianas Islands. Low-income population: Low-income populations in an affected area should be identified with the annual statistical poverty thresholds from the Bureau of the Census’ Current Population Reports, Series P-60 on Income and Poverty. In identifying low-income populations, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions of environmental exposure or effect. Minority: Individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic. Minority population: Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. In identifying minority communities, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native American ), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body’s jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as to not artificially dilute or inflate the affected minority population. A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds.”

The guidance does not set a 50 percent benchmark for low income populations contrary to the statement made in Section 4.2.1.5. The CEQ language should be used. For minority populations, by definition an area under consideration with a minority population of 50% is a minority population, or when the minority population is not 50% it is a population where, "the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis." So there is a need to determine what meaningfully greater means. Is it a simply when the minority population of the census tract exceeds the percent minority of the benchmark population? Is it some scientifically determined benchmark? What is it?

Table 3.2.1.5 shows a very large study area. Table 4.2-5 only lists a few census tracts in Montgomery and Bucks counties. Why?

As shown in Tables 4.2-5 and 4.2-6, and based on the threshold levels described above, the Navy has determined the following:

- Census Tract 200502, Block Group 4, in Montgomery County has a higher minority and Hispanic/Latino population than the community of comparison;
- Census Tract 200502 in Montgomery County as a whole has a higher percentage of people living in poverty than the community of comparison;
- Census Tract 200505, Block Group 3, and Census Tract 200506, Block Group 2, in Montgomery County have higher percentages of people aged less than 18 years than the community of comparison; and
- Census Tract 101808, Block Group 1, in Bucks County includes a larger minority population and Hispanic/Latino population than the community of comparison.

This information is incomplete. Census Tract 200502, Block Group 3 also exceeds the county benchmark for Hispanic populations.

Another quote from the same page is as follows: "However, there would not be a disproportionately high or adverse effect on these populations as the adverse effects (i.e., potential for increased traffic) would be spread throughout the community. In addition, the Redevelopment Plan was designed by the HLRA to provide economic benefit to the surrounding community, resulting in new jobs, additional housing units, and additional tax revenues for Horsham Township. Therefore, the overall impact of the redevelopment of the former installation property would promote positive economic development, which would benefit the entire township." Upon what data are these claims based? There does not seem to be any supporting evidence presented.

There is concern that the assessment is not looking at Environmental Justice as a coherent and integral part of the overall assessment. The potential for impacts needs to be given careful consideration since there may be activities that occur in some parts of the study area, or there may be activities that impact certain portions of the study area differently.

0001-47

0001-47 Text in Section 4.2.1.5 has been revised pertaining to the 50-percent benchmark using the CEQ language as specified.

In addition, the threshold for the "meaningfully greater" benchmark for analysis has been identified within the text in Section 4.2.1.5.

0001-48

0001-48 The "community of comparison" used for the environmental justice analysis was the counties within the census tracts that encompass or are immediately adjacent to the former installation property. The municipalities presented in Table 3.2-15 were to provide context for the area. To address the comment, the Philadelphia MSA and the Horsham Township have been removed from the table and associated text.

0001-49

0001-49

Census Tract 200502, Block Group 3 has been included in the list of Census Block Groups that exceed the county benchmark for Hispanic populations.

0001-50

Additional text has been added to Section 4.2 that supports the supposition that no disproportionate adverse environmental impacts would affect environmental justice communities in the area. Other sections and tables in the report have been cross-referenced to substantiate this statement.

0001-51

0001-51 Thank you for your comment. The EIS examines potential environmental justice concerns in Section 3.2.6 and by alternative in Sections 4.2.1.5, 4.2.2.5, 4.2.3.5, and 4.2.4.5. The EIS analyzes a variety of resources throughout the document, and individual study areas associated with these resource areas are noted within the analysis.

0001-51

Cumulative Impacts

As noted on page 4-22, "The proposed construction of 1,486 housing units would be expected to cause an influx of new residents to Horsham Township by increasing the number of available housing units in the township." In addition, "...the total population in Horsham Township would increase by an estimated 3,555 persons under Alternative 1." It was assessed in the DEIS that Alternative 1 would be expected to have a moderate impact on the population of Horsham Township since the increase would occur over a 20-year period. However, based on the Delaware Valley Regional Planning Commission (DVRPC), Horsham Township is anticipated to experience large growth over the next 20 years. "Between 2010 and 2030, total population in the township is expected to increase by approximately 17.1 percent, or by nearly 5,500 residents, to 30,614 residents (DVRPC 2012a)."

Page 4-23 states, "This increase in the supply of housing units in Horsham Township could have a slight impact on the price and availability of existing units as the additional units reduce demand for existing structures. However, given the extremely low homeowner vacancy rates and the low rental vacancy rates currently in the township and in the region as a whole, this impact would be expected to be minor."

When considering the cumulative increase in new housing proposed in the surrounding area [217 single-family homes, 88 duplexes (or 176 units), 82 townhomes] combined with the approximately 340 single-family homes, 350 townhomes and 400 condominiums or apartments proposed for Alternative 1, this a significant impact to the area. Has there been a study to determine the need for additional housing when developing the reuse plan?

Page 4-23 states, "Because the proposed redevelopment would occur over a 20-year period, this would result in an annual change of only 75 new housing units a year, resulting in a negligible annual impact on the township's housing market." Has there been consideration given to the average age of the population within existing homes and the impact that it may have on the vacancy rate over the 20-year period? Is there a public awareness of the proposed redevelopment plan and the impacts that it may have on existing communities? The cumulative impact on existing residences and resale value should be evaluated. The cumulative impact of increased housing and potential growth in the area should be considered in the transportation evaluation.

In addition to housing, commercial/retail establishments are proposed. What is the vacancy rate of existing commercial/retail establishments? Is there a need for more commercial/retail space? Has a study been conducted to determine need and use for additional commercial/retail space when developing the reuse plan?

As noted on page 5-12, "Assuming full build-out potential would be met and that the property would be used by business enterprises new to the region, an estimated 7,577 new permanent jobs would be generated under Alternative 1." Page 5-13 states that approximately 3,555 persons would reside in the newly constructed homes that would be built under Alternative 1. Page 5-13 states, "Cumulatively, implementation of Alternative 1 and proposed projects from

0001-52

Text has been clarified in Section 4.2.1.2 regarding population increases.

0001-52

0001-53

A real estate market analysis was conducted by the HLRA during the preparation of the Redevelopment Plan. It is presented in Chapter 7 of the Redevelopment Plan and covers the residential, office, industrial, and retail markets.

0001-54

There is public awareness of the proposed Redevelopment Plan and its overall development. The HLRA held numerous public meetings as it was working through the various iterations of the plan, as outlined in Chapter 1 of the Redevelopment Plan. The iterations of the plan were publically evaluated and comments were provided that refined the plan through the process. A detailed real estate market analysis including an analysis of market absorption was conducted by the HLRA during the preparation of the Redevelopment Plan. Additional text has been added to Sections 4.2.1.3, 4.2.2.3, and 4.2.3.3 related to property values, as well as to Section 5.4.2.2.

0001-53

Cumulative impacts to transportation have been incorporated into the analysis through the application of the PennDOT background growth factor.

0001-54

0001-55

A real estate market analysis was conducted by the HLRA during the preparation of the Redevelopment Plan. It is presented in Chapter 7 of the Redevelopment Plan and covers the residential, office, industrial, and retail markets.

0001-55

Section 5.3 (Recently Completed or Reasonably Foreseeable Actions) would increase the local population by an estimated 4,163 residents.

These are significant increases to the area in addition to potential growth expected. The cumulative impacts analysis did not fully discuss these potential impacts on residences and resale value of existing homes as well as on roads and transportation.

0001-56

The cumulative impact analysis has been revised according to EPA Comments 0001-52 through 0001-55, as well as other comments received on the Draft EIS during the public comment period.

| 0001-56

**From:** [Stephan\\_Tom\\_CTR\\_NAVFACHO\\_BRAC\\_PMO](#)  
**To:** [Butwin\\_Matthew](#)  
**Subject:** FW: Willow Grove -- Comments on Preliminary FEIS  
**Date:** Monday, August 11, 2014 9:59:18 AM  
**Attachments:** [Willow Grove Preliminary Responses from Navy 7-2014.docx](#)

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Some of EPA's comments.

-----Original Message-----

From: Delgrosso, Karen [<mailto:Delgrosso.Karen@epa.gov>]  
Sent: Friday, August 08, 2014 3:58 PM  
To: Stephan, Tom CTR NAVFACHQ, BRAC PMO  
Cc: Rudnick, Barbara; Delgrosso, Karen  
Subject: Willow Grove -- Comments on Preliminary FEIS

Hi Tom,

Attached are EPA's comments on the Environmental Justice and Transportation sections. Comments on the Environmental Management section will be forthcoming next week.

Thank you for the opportunity to review.

Karen

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Karen DelGrosso

U.S. EPA Region III (3EA30)

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### Socioeconomics and Environmental Justice

Table 3.2-15 Environmental Justice Population Characteristics, would be more useful if it contained the state demographics for comparison, and the characteristics of the targeted study area.

Please highlight all values that exceed the benchmark values in Table 4.2-5 Environmental Justice Demographic Data, by Block Group, under Alternative 1

Please highlight all values that exceed the benchmark values in Table 4.2-6 Environmental Justice Economic Data – Population Below Poverty Level, by Census Tract, under Alternative 1

A more thoughtful discussion of the potential impacts associated with the activities related to this project would be helpful. Impacts related to the construction of homes, truck traffic, noise, dust, vibration, transportation, and other activities comprehensively impacting the residents of the study area.

Please be sure that Block Groups exceeding benchmarks are correctly listed in the document. The Tables and text should be in agreement.

Page 15-16 states, “According to DVRPC projections for the period from 2010 to 2030, total population in the township is expected increase by approximately 17.1 percent, or by nearly 5,500 residents, to 30,614 residents (DVRPC 2012a).” Please insert the word “to” after the word expected.

### Transportation

Although some of what EPA requested has been added, it is uncertain as to how it has been translated into the cumulative section of the FEIS. Also, it is not clear what the potential natural/community adverse impacts are that may occur from the required mitigation measures. EPA anticipates a more comprehensive transportation component will be addressed in the cumulative impact analysis which was not provided for our review even though specific suggestions were made in our Technical Comments documents on the DEIS. Although the preferred alternative will likely have unavoidable and significant transportation impacts; the new information does not change this, but makes it slightly better documented.

### Environmental Management

Comments forthcoming.

0001A-1  
Revised as requested.

0001A-1  
The data for Pennsylvania, census tracts and block groups have been added to Table 3.2-15 and included some notes to clarify the table. In addition, Figure 4.2-1 has been moved to Section 3 and renamed Figure 3.2-1.

The following text has been added to Section 3.2:

0001A-2 "Montgomery County and Bucks County serve as a community of comparison for the environmental justice analysis presented in Section 4.2. Pennsylvania demographics are provided as background information and context for the analysis. Table 3.2-15 also provides demographic data for all census tracts and census block groups expected to be affected by the redevelopment proposed under the development Alternatives. Figure 3.2-1 identifies the locations of the census tracts and census block groups that fall within the project area or that are directly adjacent to the project area. Income statistics are not provided at the census block group level; therefore, they are only presented in Table 3.2-15 at the larger census tract level."

0001A-5

0001A-2  
0001A-6 Revised as requested.

0001A-3  
Revised as requested.

0001A-7

0001A-4  
Revised as requested.

The following three text revisions have been included within Section 4.2.1.5:

"Comprehensive impacts could adversely affect the residents of the community related to the construction phase of the redevelopment including the construction of homes, truck traffic, noise, dust, vibration, and other construction activities. Specific adverse..."

"In addition, traffic patterns during construction of Alternative 1 would adversely impact the local community. In the interest of providing..."

"In addition, construction impacts such as noise, dust and vibration would be felt throughout the community."

0001A-5  
Revised as requested.

Census Tract 200502 Block Groups 3 and 4 have a higher percentage of children than Montgomery as a whole, and shading was added to these cells.

0001A-6

Revised as requested.

0001A-7

Text related to the potential natural/community adverse impacts related to mitigation measures has been added to Section 5.4.4.2, Cumulative Impacts for transportation as well as referenced at the end of Section 4.4, Transportation impacts.



**From:** [Stephan, Tom CTR NAVFACHO, BRAC PMO](#)  
**To:** [Butwin, Matthew](#)  
**Subject:** FW: Comments on the Final EIS for NAS JRB Willow Grove  
**Date:** Monday, August 18, 2014 10:21:12 AM

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FYI

-----Original Message-----

From: Delgrosso, Karen [<mailto:Delgrosso.Karen@epa.gov>]  
Sent: Thursday, August 14, 2014 11:25 AM  
To: Stephan, Tom CTR NAVFACHO, BRAC PMO  
Cc: Rudnick, Barbara; Leipter, Mark; Delgrosso, Karen  
Subject: FW: Comments on the Final EIS for NAS JRB Willow Grove

Tom,

As requested, below are EPA's comments on the Environmental Management section.

Thank you for the opportunity to review. If you have questions, do not hesitate to contact me or Mark Leipter (215-814-3341).

Karen

---

Karen DelGrosso

U.S. EPA, Region III (3EA30)

1650 Arch Street

Philadelphia, PA 19103

215-814-2765

[delgrosso.karen@epa.gov](mailto:delgrosso.karen@epa.gov)

Environmental Management

1. Based on recent concerns with PFOS and PFOAs at NAS JRB Willow Grove, testing is recommended at the locations of the aboveground storage tanks (AST) which were used to store AFFF (Buildings 80, 177, 183, 650 and 681 are all potential source areas).

0001A-8

Thank you for your comment. Recent concerns with PFOS and PFOAs at NAS JRB Willow Grove are being addressed by the Navy in coordination with EPA under the CERCLA program. Sections 3.5.4 and 4.5.1.2 have been updated with this information. CERCLA Section 9620(h)(3)(A) requires that, prior to property transfer, all necessary remedial actions to protect human health and the environment be completed or in place and proven to be operating properly and successfully prior to transfer. Any necessary environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels would be described in the document known as the Finding of Suitability to Transfer (FOST) and, as applicable, contained in the property transfer deed. Additional information on this topic has been added to Section 4.5.

| 0001A-8

2. Page 11, Section 3.5.3.8, Pesticides, first paragraph: Please explain what happened to the Pest Management Plan for NAS JRB Willow Grove prior to 2001? The Base was required to keep the records of pesticide use. In the 1990's the Public Works Office maintained these records.
3. Page 12, Section 3.5.3.9, Potential Radioactive Materials Sites: Please spell out the acronym for AEC and include it in the List of Acronyms.
4. Figure 4-3, depicts the locations of ASTs: Please add this figure to the List of Figures.
5. Page 18, Table 3.5-6, IRP Sites Associated with the Former NAS JRB Willow Grove Property: Site 1 - Privet Road Compound, third column, add to "Current Status" that the Air Force is also sampling some additional monitoring wells to help close out the site.
6. Page 18, Table 3.5-6, IRP Sites Associated with the Former NAS JRB Willow Grove Property: Site 5 - Fire Training Area, add to "Brief Description" the newest contaminant of concern, Perfluorinated Compounds.
7. Page 18, Table 3.5-6, IRP Associated with the Former NAS JRB Willow Grove Property: Site 8, Building 118 Abandoned Fuel Tank, under the "Brief Description" column, it states, "Soils around the tank did not indicate the persence of released materials." Please state whether samples were taken and analyzed.
8. Page 21, Section 4.5, Environmental Management, fourth paragraph: Spell out the acronym for "ICs" and include in the List of Acronyms.
9. Page 22, paragraph 4, last sentence: add "at this time". The sentence should read: The HLRA has not requested that any property be transferred under the early transfer process at this time.
10. Page 25 states, "As discussed in Section 3.5.3.8, documentation on the use and storage of pesticides and herbicides at the installation prior to 2001 was unavailable." See above comment (2) and explain why the documentation for pesticide and herbicide use and storage is unavailable prior to 2001?
11. Table 4.5-1, IRP Site Impacts under Alternative 1, "Potential Impact" column, Site 12, add "According to geophysics there is debris buried in place." Discuss the need to dispose of this debris.
12. Page 28, Section 4.5.1.2 Environmental Restoration Program, Reuse Constraints from VOC-Contaminated Groundwater: add new information for Site 5 PFOS/PFOA contaminants of concern and restrictions.
- 0001A-9 Revisions to text have been made to Section 3.5.3.8 to further clarify pesticide management at the former NAS JRB Willow Grove property and the plans/programs that governed it. After further checking, the records of pesticide use prior to 2001 remain unavailable.
- 0001A-10
- 0001A-10 Revised as requested. The acronym has been added to the beginning of Section 3.5, which is where Atomic Energy Commission (AEC) is first used, and also added to the List of Acronyms.
- 0001A-11
- 0001A-12 0001A-11 Table 3.5-1 includes a description of the location (current or former) of the aboveground storage tanks (ASTs) at the former NAS JRB Willow Grove installation. A figure depicting the locations of ASTs from the Environmental Conditions of Property (ECP) report was not included because this information has substantially changed since publication of the ECP in 2006. All ASTs have been closed either in-place or removed and these closures were done in accordance with PADEP requirements and regulations, as noted in Table 3.5-1.
- 0001A-13
- 0001A-14
- 0001A-12 Text has been added to the "Current Status" column of the referenced table stating "additional sampling of monitoring wells is ongoing."
- 0001A-15
- 0001A-13 Text has been added to the "Brief Description" column of the referenced table stating "Various treatment studies and investigations have been conducted..." However, this summary table does not specify compounds and therefore "Perfluorinated Compounds" was not included in the "Brief Descriptions" column.
- 0001A-16
- 0001A-17
- 0001A-14 It is not documented whether samples were taken and analyzed at Site 8, Building 118. The U.S. Navy recommended No Further Action (NFA) for Site 8 based on previous investigations and the results of the site screening process. Site 8 was designated NFA prior to being placed on the National Priorities List (NPL) by the Pennsylvania Department of Environmental Protection (PADEP). The U.S. Navy was granted concurrence on this conclusion by the U.S. EPA and has designated Site 8 as NFA in the Federal Facilities Agreement (FFA).
- 0001A-18
- 0001A-19

0001A-15

Revised as requested. The definition for the acronym "ICs" has been added at first mention in the 3<sup>rd</sup> paragraph, and it has also been added to the List of Acronyms.

0001A-16

Revised as requested.

0001A-17

See response to Comment 0001A-9.

0001A-18

Text revised to include a statement on debris being buried in place; however, the need to dispose of debris was not included, as that is dependent on the treatment determined under the CERCLA process.

0001A-19

See response to Comment 0001A-8.

13. Page 32, Section 4.5.2.1, Potential Radioactive Materials Sites, sentence four, add potential for "radioactive" contamination. The sentence should read: "Under Alternative 2, eight sites (Buildings 20, 23, 29, 80, 118, and 680 and IRP sites 3 and 12) of the nine sites with a "likely" or "unknown" potential for radioactive contamination would be located in areas designated as golf course, ground floor retail, hotel/conference center, office park, open space, park, roads/plazas, or town center."

0001A-20  
Revised as requested.

0001A-20

0001A-21  
Text revised to include a statement on debris being buried in place.

14. Page 33, Table 4.5-2, IRP Site Impacts under Alternative 2, third column - "Potential Impact": Sites 3 and 12: add " subsurface debris" see Geophysics.

0001A-21

0001A-22  
Revised as requested.

15. Page 35, 4.5.3.1 Hazardous Waste and Materials, Potential Radioactive Materials Sites, sentence three, add potential for "radioactive" contamination. The sentence should read: Under Alternative 3, eight sites (Buildings 20, 23, 29, 80, 118, and 680 and IRP sites 3 and 12) of the nine sites with a "likely" or "unknown" potential for radioactive contamination would be located in areas designated as airfield, airfield operations, golf course, hotel/conference center, office park, open space, park, or roads/parking."

0001A-22

0001A-23  
Text revised to include a statement on debris being buried in place.

16. Page 40, Table 4.5-3, IRP Site Impacts under Alternative 3, the third column -"Potential Impact": Sites 3 and 12, add the need to be aware of subsurface debris as shown in Geophysical Investigation.

0001A-23

0001B-1

Please see new Appendix I for more details pertaining to your comment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

February 19, 2015

Mr. Gregory C. Preston  
Director  
BRAC Program Management Office, East  
4911 S. Broad Street  
Building 679  
Philadelphia, PA 19112

Re: Preliminary Final Environmental Impact Statement for the Disposal and Reuse of the Former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, Horsham, PA

0001B-1

Dear Mr. Preston:

This letter is in response to the Environmental Protection Agency's (EPA) review of the Preliminary Final Environmental Impact Statement that was shared with EPA on February 6, 2015 (February 6, 2015 Preliminary FEIS). EPA appreciates the engagement that the Navy has offered and the effort put forward to address EPA's concerns regarding how issues related to the presence of Perfluorinated Compounds (PFCs) at the site would be addressed in the FEIS. We believe that the February 6, 2016 Preliminary FEIS greatly improves documentation of an informed decision by the Navy regarding the disposal and reuse of the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, Horsham, Pennsylvania. The information provided in the February 6, 2015 Preliminary FEIS clarifies the status to date of sampling and investigation into the presence of PFCs at the site. The revisions also clarify that the contamination will be addressed and remediated through the CERCLA process. In addition, prior to the transfer or lease of the former NAS JRB Base Willow Grove property, the Navy will prepare a Finding of Suitability to Transfer (FOST) or Finding of Suitability to Lease (FOSL) and will forward these documents to the EPA for review. I would like to thank you and your staff for working in cooperation with our office to develop NEPA documentation that reflects an informed decision, specifically as it relates to the presence of PFCs at the former NAS JRB Willow Grove site.

As you prepare to release the Final Environmental Impact Statement, EPA would like to offer for your consideration the following suggestions to further enhance the FEIS. In addition to the information provided in the Preliminary FEIS on the FOST/FOSL process, it would be very helpful to describe more detail of the process (including what is entailed in the process and the level of information that can be expected in the FOST). It is also suggested that a

communication point-of-contact be designated and disclosed to address long-term questions that may arise from the public.

Please be aware that, while EPA has reviewed the February 6, 2015 Preliminary FEIS, EPA remains obligated to review the signed and published FEIS. At that time, we will send a more formal letter. Assuming the published FEIS will be nearly identical to the February 6, 2015 Preliminary FEIS that we have reviewed, we do not anticipate raising concerns or objections.

EPA appreciates your efforts in working with us to address issues that have significant potential to impact human health and the environment for future generations. If you have questions on this response, please feel free to contact Mrs. Karen DelGrosso of my staff at 215-814-2765 or email at [delgrosso.karen@epa.gov](mailto:delgrosso.karen@epa.gov).

Sincerely,



Jeffrey D. Lapp  
Associate Director  
Office of Environmental Programs

0001B-2

Section 3.5.3.9 has been updated to indicate that the Navy initiated the scoping surveys in December 2014. The current status of investigation for PFCs is included in new Appendix I, Section I-2 Affected Environment.

0001B-3

Please see new Appendix I, Section I-2 Affected Environment.

0001B-4

Please see new Appendix I, Section I-2 Affected Environment.

0001B-5

Please see new Appendix I, Section I-2 Affected Environment and Section I-3 Environmental Consequences.

0001B-6

0001B-2

The potential for increase in water demand is outlined by each alternative in Sections 4.8.1.1, 4.8.2.1, and 4.8.3.1. If full build out is realized, all three redevelopment alternatives evaluated in the EIS would result in an increase in water demand. Based upon recent developments in the summer of 2014 related to the detection of PFCs that exceeded provisional health advisory levels (PHALs), two of the Horsham Water Sewer Authority (HWSA) wells were removed from service, specifically well numbers 26 and 40. This is discussed in more detail within Appendix I.

0001B-3

0001B-4

0001B-5

0001B-6

As noted in Section 3.8.1.1 (and prior to the removal of wells 26 and 40 from service), the HWSA wells met approximately 80 to 85 percent of the daily water demand. As a result, additional water supply is purchased from two neighboring suppliers, specifically North Wales Water Authority and Aqua Pennsylvania. As a result of the removal of wells 26 and 40, the HWSA would be required to purchase additional potable water from these (or other) suppliers. However, the Navy is working with the HWSA in order to evaluate options for the permanent replacement of water, which could include installing treatment and reconnecting the wells to the drinking water system or abandonment of the impacted wells and purchase of water from other sources.

(Response continued on next page)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION III  
 1650 Arch Street  
 Philadelphia, Pennsylvania 19103-2029

February 19, 2015

Mr. Gregory C. Preston  
 Director  
 BRAC Program Management Office, East  
 4911 S. Broad Street  
 Building 679  
 Philadelphia, PA 19112

Re: Preliminary Final Environmental Impact Statement for the Disposal and Reuse of the Former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, Horsham, PA

Dear Mr. Preston:

This letter is in response to the Environmental Protection Agency's (EPA) review of the Preliminary Final Environmental Impact Statement that was shared with EPA on February 6, 2015 (February 6, 2015 Preliminary FEIS). EPA appreciates the engagement that the Navy has offered and the effort put forward to address EPA's concerns regarding how issues related to the presence of Perfluorinated Compounds (PFCs) at the site would be addressed in the FEIS. We believe that the February 6, 2016 Preliminary FEIS greatly improves documentation of an informed decision by the Navy regarding the disposal and reuse of the former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove, Horsham, Pennsylvania. The information provided in the February 6, 2015 Preliminary FEIS clarifies the status to date of sampling and investigation into the presence of PFCs at the site. The revisions also clarify that the contamination will be addressed and remediated through the CERCLA process. In addition, prior to the transfer or lease of the former NAS JRB Base Willow Grove property, the Navy will prepare a Finding of Suitability to Transfer (FOST) or Finding of Suitability to Lease (FOSL) and will forward these documents to the EPA for review. I would like to thank you and your staff for working in cooperation with our office to develop NEPA documentation that reflects an informed decision, specifically as it relates to the presence of PFCs at the former NAS JRB Willow Grove site.

As you prepare to release the Final Environmental Impact Statement, EPA would like to offer for your consideration the following suggestions to further enhance the FEIS. In addition to the information provided in the Preliminary FEIS on the FOST/FOSL process, it would be very helpful to describe more detail of the process (including what is entailed in the process and the level of information that can be expected in the FOST). It is also suggested that a

0001C-1

Information has been added to Section 4.5. In addition, Appendix J (DOD Format for Finding of Suitability to Transfer/Lease) has been added to the FEIS which outlines the content and format of a FOST or FOSL.

0001C-1

communication point-of-contact be designated and disclosed to address long-term questions that may arise from the public.

Please be aware that, while EPA has reviewed the February 6, 2015 Preliminary FEIS, EPA remains obligated to review the signed and published FEIS. At that time, we will send a more formal letter. Assuming the published FEIS will be nearly identical to the February 6, 2015 Preliminary FEIS that we have reviewed, we do not anticipate raising concerns or objections.

EPA appreciates your efforts in working with us to address issues that have significant potential to impact human health and the environment for future generations. If you have questions on this response, please feel free to contact Mrs. Karen DelGrosso of my staff at 215-814-2765 or email at [delgrosso.karen@epa.gov](mailto:delgrosso.karen@epa.gov).

Sincerely,



Jeffrey D. Lapp  
Associate Director  
Office of Environmental Programs

0001C-2

Contact information for the Base Environmental Coordinator and RAB Chair, Mr. Willington Lin, has been added to Section 3.5.4.

0001C-3

0001C-3

Thank you for your comment.





## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904



0002-1  
Thank you for your comment.

January 31, 2014

9043.1  
ER 13/0802

Gregory C. Preston, Director  
BRAC Program Management Office East  
Attn: Willow Grove EIS  
4911 South Broad Street, Building 679  
Philadelphia, PA 19112-1303

Dear Mr. Preston:

The U.S. Department of the Interior has no comment on the U.S. Department of Defense Draft Environmental Impact Statement for the Disposal and Reuse of the Naval Air Station Joint Reserve Base Willow Grove, located in Horsham, Pennsylvania.

We appreciate the opportunity to provide these comments.

0002-1

Sincerely,

Lindy Nelson  
Regional Environmental Officer,  
Office of the Environmental  
Policy and Compliance



February 6, 2014

Director, BRAC Program
Management Office East
Attn: Willow Grove EIS
4911 South Broad Street
Building 679
Philadelphia, PA 19112-1303

RE: UNITED STATES NAVY'S DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE DISPOSAL AND REUSE OF THE FORMER NAVAL AIR STATION JOINT RESERVE BASE WILLOW GROVE, HORSHAM, PENNSYLVANIA

Dear Director,

In response to the December 20, 2013 letter of invitation to provide comment, the Pennsylvania Department of Transportation (PennDOT) District 6-0 Traffic Unit has performed a cursory review of the traffic impact study and recommended scope of mitigation associated with the redevelopment of the former Willow Grove Naval Air Station.

We offer the following general comments based on this cursory review. Please be advised we did not perform a detailed review of the methodology of the study itself. It is our opinion that that level of analysis does not meet the current need for general direction and such a review would be most appropriate after a final plan option for redevelopment is selected.

The study does meet our current standards for such studies with respect to the general format and methodology used.

The Department recommends the intersection of Maryland Ave and 611 be added to the study scope.

The recommendations for mitigation, while seemingly accurate from an engineering perspective may be unrealistic due to physical, financial or right of way constraints. This is not discussed at all in the study and thus may portray an idealistic vision for planning and decision making purposes. These challenges should be formally and prominently identified in the study and/or at the public meetings. Furthermore, if certain recommended improvements can be identified as infeasible, impractical or far too costly vs. benefit, a discussion of alternate improvement options should be included in the study. Examples may include but are not limited to: traffic signal technology upgrades, alternate travel mode improvements (bike, pedestrian, mass transit), physical improvements to intersections beyond the included study scope.

A discussion of alternate modes of travel such as transit should also be included in the study. Given the size of the overall redevelopment many of the roadway improvements could be funded within the development business models but some such as adding additional thru lanes along the length of SR 611 from the PA Turnpike through the frontage of the former base may require a public project to be added to the Transportation Improvements Program - 12 year plan. The scale of such a project may not be able to be fully supported by private financing. Director -- BRAC Program

0003-1

The Navy discussed the letter received on the Draft EIS with PennDOT representatives, and it was clarified that the Navy has recognized the HLRA as the redevelopment agency who would be responsible for choosing the final plan option for the former installation property. The EIS is one of several steps the Navy is required to take in order to transfer the property for redevelopment. As such, PennDOT's suggestion to review the transportation needs following the final plan should be coordinated with the HLRA and local municipalities.

The developer will be required to comply with the site plan approval process and additional studies may be required as part of that process. Additional information related to the site plan approval and transportation planning process has been added to Section 4.4 of the Final EIS.

0003-2

Thank you for your comment. No change required.

0003-3

Thank you for your recommendation. The intersection at Maryland Road and Easton Road (SR 611) has been added to the analysis. Associated additions and revisions have been incorporated into the text and tables in Sections 3.4 and 4.4, as appropriate.

0003-1

0003-4

Statements have been added to Section 4.4.1, as well as the individual redevelopment alternative sections (4.4.2.3, 4.4.3.3, and 4.4.4.3) outlining that the feasibility of the proposed mitigation measures needs to be further evaluated from an engineering perspective. Certain physical, financial, or right-of-way constraints may prohibit the full implementation of the presented mitigation measures; however, alternate improvement options can be evaluated, including traffic signal technology upgrades, alternative travel mode improvements, and other physical improvements to intersections not already proposed in the study.

0003-2

0003-3

0003-4

In addition, the planning horizon for many of the large-scale improvements are up to 10 years in the future. To address these future traffic concerns, it is necessary to begin planning, funding and studying these proposed improvements in a timely fashion. Text has been added to Section 4.4.1 generally outlining the transportation planning process and acknowledging the long-term planning required to implement certain mitigation measures.

0003-5

0003-5

Alternative modes of transportation (specifically transit) are described in Section 3.4.7, Public Transportation. Additional text has been included in Section 4.4 under each of the three alternatives that qualitatively discusses the use of alternative modes of transportation.

In addition, statements have been added to Sections 4.4.1.3, 4.4.2.3, and 4.4.3.3 (Mitigation, under the transportation resource area for each of the build alternatives) that the potential for additional through lanes along SR 611 may require a public project to be added to the Transportation Improvements Program - 12-year plan.

February 6, 2014  
Page 2

The Department does recognize this is likely a vital capacity upgrade to mitigate the additional traffic generated.

The analysis notes a 15-20 year build-out period of phased development. A comparable plan for the phased implementation of roadway improvements must be developed that identifies milestones/thresholds whereby certain identified physical improvements must be implemented. It should further identify the responsible party, be it developer or public, for each improvement. Coordination and compliance with local municipality's visions and transportation needs should also be discussed. Ultimately, the local municipalities as well as PennDOT, Bucks and Montgomery Counties will be stakeholders in the development itself as well as the scope of roadway and other improvements. Each municipality, both Counties and PennDOT will have to be in agreement on the phased improvements plan so that land development approval can go smoothly, thus making the site more attractive to development by lessening approval time duration and complexity.

The Department recommends a working group be established with engineering representatives from each stakeholder once a final alternative is selected. This group can further refine the study and begin to identify and address the challenges noted above. This site redevelopment is of regional significance due to its size and location and therefore must be subject to a commensurate high level of transportation planning.

If you have any questions on these comments, please feel free to contact Francis Hanney, Traffic Services Manager, at (610) 205-6560 or by email at [fhanney@pa.gov](mailto:fhanney@pa.gov). Thanks again for the opportunity to comment.

Sincerely,



Louis Belmonte, P.E.  
PennDOT District 6-0 Traffic Engineer

CC: Lester Toaso  
Scott Fletcher  
Francis Hanney  
Montgomery County Planning Commission  
Bucks County Planning Commission

0003-6

Based upon PennDOT's comment letter on the Draft EIS, two, 10-year, phased development periods were incorporated into the traffic impact analysis for the Final EIS. Text and tables within Sections 3.4 and 4.4 were revised and updated accordingly. It was identified that, for the intersections failing to meet PennDOT requirements under Phase I, planning for roadway improvements and other mitigation measures should begin early and prior to development of the property.

0003-6

Additional language has been incorporated into the Final EIS stating that in order to plan for and implement roadway and other improvements, a transportation working group with representatives from each stakeholder group (including PennDOT and the counties) should be established to review, further study and coordinate the potential improvements as part of the site plan approval process.

0003-7

The developer will be required to comply with the site plan approval process and should begin transportation planning as soon as possible. Additional studies may be required as part of that process.

0003-7

The Navy discussed the letter received on the Draft EIS with PennDOT representatives, and it was clarified that the Navy has recognized the HLRA as the redevelopment agency who would be responsible for implementation of the redevelopment of the former installation property. The EIS is one of several steps the Navy is required to take in order to transfer the property for redevelopment. As such, PennDOT's suggestion to establish a working group with representatives from each stakeholder group once the final alternative has been selected should be coordinated with the HLRA and local municipalities.

The developer will be required to comply with the site plan approval process and additional studies may be required as part of that process. Additional information related to the site plan approval and transportation planning process and establishing a transportation working group has been added to Section 4.4 of the Final EIS. In addition, establishing the proposed working group has been added to the best management practices recommendations under transportation in Section 6.1.

**Butwin, Matthew**

---

**From:** Hanney, Francis J. <FHANNEY@pa.gov>  
**Sent:** Wednesday, August 06, 2014 2:27 PM  
**To:** Butwin, Matthew  
**Cc:** Stephan, Tom CTR NAVFACHQ, BRAC PMO  
**Subject:** RE: NAS JRB Willow Grove EIS comments

I apologize for the delay. The revised study is acceptable and we have no further comments. Thank you for making the requested changes. We do hope this will give the planners and decision makers insight on the challenges ahead. Will we get a formal final copy?

-----Original Message-----

**From:** Butwin, Matthew [REDACTED]  
**Sent:** Wednesday, August 06, 2014 10:47 AM  
**To:** Hanney, Francis J.  
**Cc:** Stephan, Tom CTR NAVFACHQ, BRAC PMO  
**Subject:** RE: NAS JRB Willow Grove EIS comments

Good morning Fran -

I wanted to touch base on the Willow Grove BRAC EIS and see if you had any questions on your review of the sections we supplied in late July.  
I am available to discuss, if needed.

Thank you ,  
Regards,  
Matt

-----Original Message-----

**From:** Hanney, Francis J. [<mailto:FHANNEY@pa.gov>]  
**Sent:** Wednesday, July 23, 2014 4:13 PM  
**To:** Butwin, Matthew  
**Cc:** Stephan, Tom CTR NAVFACHQ, BRAC PMO  
**Subject:** RE: NAS JRB Willow Grove EIS comments

Thank you for making the changes and incorporating the concepts and concerns we had stated during our May conference call. We will review and get back to you by the 31st or sooner.

-----Original Message-----

**From:** Butwin, Matthew [REDACTED]  
**Sent:** Wednesday, July 23, 2014 1:56 PM  
**To:** Hanney, Francis J.  
**Cc:** Stephan, Tom CTR NAVFACHQ, BRAC PMO  
**Subject:** RE: NAS JRB Willow Grove EIS comments

Mr. Hanney -

0003A-1

Thank you for your comment and review of the revised Transportation sections for the FEIS.

0003A-1

To follow-up on Tom's e-mail, I am also attaching PennDOT's original comments on the Navy's Draft EIS along with the proposed responses.

V/R,  
Matt

-----Original Message-----

From: Stephan, Tom CTR NAVFACHQ, BRAC PMO [REDACTED]

Sent: Wednesday, July 23, 2014 11:28 AM

To: Hanney, Francis J.

Cc: Butwin, Matthew

Subject: RE: NAS JRB Willow Grove EIS comments

Mr. Hanney,

Thank you for your review and comments on the Draft Environmental Impact Statement (DEIS) for the Disposal and Reuse of the former Naval Air Station Joint Reserve Base (NASJRB) Willow Grove, Horsham, PA dated February 6, 2014 and your input during our conference call on May 15, 2014. We have incorporated your comments in the attached Traffic section. Revisions to the text are highlighted.

Attached is the updated traffic section for the EIS NAS JRB Willow Grove and the original PennDOT comments.

We would appreciate your comments by July 31, 2014. If you have any questions, please do not hesitate to me at (215) 897-4916.

Vr-tom

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Division of Environmental  
Planning and Habitat  
Protection  
717-783-5957

COMMONWEALTH OF PENNSYLVANIA  
**Pennsylvania Game Commission**  
2001 ELMERTON AVENUE  
HARRISBURG, PA 17110-9797

*"To manage all wild birds, mammals and their habitats  
for current and future generations."*

**ADMINISTRATIVE BUREAUS:**  
ADMINISTRATION.....717-787-5670  
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FISCAL MANAGEMENT.....717-787-7314  
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PROCUREMENT.....717-787-6594  
LICENSING.....717-787-2084  
OFFICE SERVICES.....717-787-2116  
WILDLIFE MANAGEMENT.....717-787-5529  
INFORMATION & EDUCATION.....717-787-6298  
WILDLIFE PROTECTION.....717-783-6526  
WILDLIFE HABITAT  
MANAGEMENT.....717-787-6818  
REAL ESTATE DIVISION.....717-787-6588  
AUTOMATED TECHNOLOGY  
SERVICES.....717-787-4076

[www.pgc.state.pa.us](http://www.pgc.state.pa.us)

0004-1

Thank you for your comment.

January 27, 2014

Director, BRAC Program Management Office East  
Attn: Willow Grove EIS  
4911 South Broad Street, Building 679  
Philadelphia, Pennsylvania 19112-1303

Re: Former Naval Air Station Joint Reserve Base Willow Grove, Horsham, Pennsylvania  
Draft Environmental Impact Statement for the Disposal and Reuse of the Site

To Whom It May Concern,

Thank you for providing a copy of the Draft Environmental Impact Statement for the Disposal and Reuse of the Former Naval Air Station Joint Reserve Base Willow Grove, Horsham, Pennsylvania dated December 2013 to the Pennsylvania Game Commission (PGC) for review and comment. The PGC has screened this project for potential impacts to species and resources of concern under PGC responsibility. Based upon the fact that no known occurrence of species or resources of concern under PGC jurisdiction are located within the project area or vicinity, the PGC has no comments on the draft report at this time.

We appreciate the opportunity to provide these comments at this stage in the process and look forward to working with you in the future. If you have any questions or concerns, please contact me.

Sincerely,

Olivia A. Mowery  
Environmental Planner  
Division of Environmental Planning & Habitat Protection  
Bureau of Wildlife Habitat Management  
Phone: 717-787-4250, Extension 3128  
Fax: 717-787-6957  
E-mail: OMowery@state.pa.us

A PNHP Partner



Pennsylvania Natural Heritage Program

OAM/oam

cc: File

0004-1



# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of  
Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

You are invited to comment on the Draft EIS. To be most helpful, comments should be clearly written and describe specific issues or topics. 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 meeting, **(2)** speak your comments to the court reporter before leaving the meeting, **(3)** mail your comments (see address below), **(4)** e-mail your comments to gregory.preston@navy.mil, or **(5)** fax comments to (215) 897-4902.

**Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.**

PLEASE SEE THE ATTACHED FORMAL LETTER ON BEHALF OF THE  
MONTGOMERY COUNTY PLANNING COMMISSION.

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

- 1. Name JODY HOLTON, EXECUTIVE DIRECTOR
- 2. Address MONTGOMERY CO. PLANNING COMMISSION, P.O. BOX 311, NORRISTOWN, PA 19404-0311
- 3. E-mail JHOLTON1@MONTCOPA.ORG
- 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 MEETING or mail to:

Director, BRAC Program Management Office East, Attn: Willow Grove EIS  
4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303

[www.willowgroveeis.com](http://www.willowgroveeis.com)

## YOUR INPUT MATTERS



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JODY L. HOLTON, AICP  
EXECUTIVE DIRECTOR

0005-1

A summary of the Montgomery County Comprehensive Plan, "Shaping our Future," and applicable analysis have been added to Section 3.1.3 and in Section 4.1 by alternative.

February 10, 2014

Director, BRAC Program Management Office East  
Attn: Willow Grove EIS  
4911 South Broad Street  
Building 679  
Philadelphia, PA 19112-1303

Re: Comments on the U.S. Department of the Navy's Draft Environmental Impact Statement for the former NAS-JRB Willow Grove

Dear United States Department of the Navy:

We thank you for sending our office a copy of the Draft Environmental Impact Statement (DEIS) for our review. We have examined the document at length and we offer this letter as a record of our comments and suggestions.

1. Consideration of the County Comprehensive Plan. Section 3.1.3 of the DEIS catalogs well-established local and regional planning documents from Horsham Township, surrounding municipalities, and the Delaware Valley Regional Planning Commission. However, Montgomery County's own comprehensive plan, *Shaping Our Future*, is omitted. We urge the authors to include our plan in the discussion, which can be found online at <http://www.montcopa.org/index.aspx?nid=1478>.

The future land use map from *Shaping Our Future* characterizes the former NAS-JRB property as an employment center that should include offices, research facilities, and light industrial/manufacturing uses, with complementary retail service, educational, and residential uses. Specific to the air base property however, is an additional overlay category called Unique County-Wide Land Use, described as "unique, existing infrastructure, institutional, and utility uses that serve a large area and are needed by the community as a whole. These can create noise, vibration, odor, and visual impacts or, alternatively, can create negative perceptions of an area. Nevertheless, these uses generally meet a county-wide need (Land Use Plan, p. 160-161)." This unique county-wide land use recommendation is an acknowledgment of the important asset that the airfield once was to the county's economy and infrastructure.

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0005-2

Thank you for your comment. The Navy agrees that the EIS analysis for redevelopment of the former installation property should be evaluated at a regional level. The introduction to Section 3, as well as the introductions to individual resource areas, have been updated to state which resource areas were analyzed at the community or regional level, as well as providing a study area for the specific resource. Resources evaluated at the municipal, county, or regional levels include land use, socioeconomics, community services, transportation, air quality, and infrastructure and utilities. For instance, Section 3.6, Air Quality, discusses air quality impacts within the Philadelphia-Wilmington Air Control Region.

2. Regional Scope. With the former NAS-JRB property encompassing over 900 acres wholly contained within one municipality, it is logical to consider the impacts of future development within the boundaries of the base itself, or on the properties immediately bordering it, or only within Horsham Township. However, many of the affected resources are part of a much larger area whose boundaries go farther into neighboring townships. Traffic, stormwater, air emissions, water quality, and economic development impacts – to name a few – are part of extensive systems that extend for several miles beyond Horsham into neighboring communities in every direction. In the past, there has been significant flooding downstream from the WGNAS site in both the Neshaminy and Pennypack Creek watersheds. Traffic continues to be a significant regional issue along the US Route 611 corridor both north and south of the base. With the need to establish sewer and water infrastructure to service any development on the base, there is the potential to impact both the existing water supplies and the local water quality in area streams. Therefore, we urge the Navy to ensure that the DEIS takes a regional approach in its scope – to look at impacts well beyond the redevelopment area, as appropriate for each resource.

We commend the U.S. Department of the Navy for taking the time to thoroughly document the potential human and natural environmental consequences of the former NAS-JRB's potential redevelopment, and we are grateful for the chance to comment on the DEIS.

Sincerely,



Jody Holton  
Executive Director



February 7, 2014

Mr. Gregory Preston  
Base Realignment and Closure  
Program Management Office, Northeast  
4911 South Broad Street  
Philadelphia, PA 19112-1303

Re: Draft Environmental Impact Statement (EIS) for NAS-JRB Willow Grove

Dear Mr. Preston:

We thank you for the opportunity to comment on the Draft Environmental Impact Statement of the Disposition and Reuse of the Former Naval air Station Joint Reserve Base Willow Grove dated December 2013. In general we find the report very thorough and a confirmation of the economic viability of the HLRA's plan for the redevelopment of the former base, we would however offer the following:

**General Comments**

Alternative 3

It should be clearly noted in the EIS that Alternative 3 (Airfield Reuse) is a hypothetical use of the property that is not similar to either of the Notices of Interest that were received by the HLRA concerning the reuse of the property as an airport. The findings in the analysis of Alternative 3 as presented in the Draft EIS cannot be assumed to be the same for either of the proposals presented by the Bucks County Airport Authority or Montgomery County.

With regard to Alternative 3, we have the following comments and questions:

- It should be noted that most of the "Open Space" is the result of the setbacks required for the runway and the open space would not be available for public use.
- Locating the recreation center, BCHG housing, and the proposed hotel and conference center on the property is not likely due to safety concerns and the impact that the airport would have on the marketability of the property.
- The financial impact to the school district prior to build out of the office park would be significant given that most of the property would be a tax exempt airport.

0006-1  
Language has been added to Section 2, Description of Alternatives, clarifying that Alternative 3 is only an alternative for the EIS and not necessarily a reuse approved by the HLRA.

0006-2  
Text has been added indicating that some of the Open Space under Alternative 3 would not be available for public use due to required setbacks associated with the proposed airport's runway.

0006-3  
None of the facilities noted are sited in the runway protection zones or the potential flight paths associated with proposed airport's runway. These land uses would be considered compatible. The BCHG housing is a required conveyance and the houses could be constructed to be more soundproof. The recreation center and hotel/conference center could be located next to the airport, but may have restrictions associated with the height of the buildings.

0006-4  
Language has been added to Section 4.2.3 discussing potential revenue implications for the school district associated with the timing of development of the office park and the likely tax-exempt status of the airport.

0006-1

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0006-4

- A civilian airport has a negative impact on the marketability and value of the residential property in the region as well as the quality of life. The property located at the both ends of the runway would suffer significant impact due to the state mandated zoning limitations associated with civilian airports, thus affecting the tax base of the county, township and school district.
- The Draft EIS states “Noise from aircraft operations would be present; however total acreage within the 65 dB DNL noise zone would decrease from 2010 conditions.” The statement is an unrealistic subjective analysis of the proposed uses of the civilian airport. Further given that DOD recommended closure of the base in 2005 and as a consequence relocated most of the aircraft before 2010 the use of 2010 as a base year is not a true representation of the impact of the former military airport. Note the decline in air operations throughout the years and especially after the DOD recommendation to close the base. In 1978 the report states there were 69,076 air operations and only 12,781 in 2010.
- The draft EIS reports that “The airport use would have no impact on the environment related to hazardous waste and materials relative to the base year of 2010; although the quantity of hazardous materials and waste generated, stored, or disposed of would be expected to be greater than under Alternatives 1 or 2 due to aircraft/airfield operations”. The conclusion is unfounded given that the use of 2010 as a base year when the base was shutting down and the unknown uses associated with the proposed civilian airport. A civilian airport use would no doubt create a potentially significant impact to the environment and would not have the federal government resources to address the impact.

Alternative 4 “No Action Alternative”

The report indicates that the no action alternative has no impact. However, that assumes that the impact aid to the Hatboro Horsham School District will continue indefinitely. That is highly unlikely and most probably the school district will experience a significant impact from the loss of impact aid from the tax exempt status of the federally owned property.

With the no action alternative the property will remain vacant without a source of water for fire suppression and without adequate security provided by the Navy. This condition would surely cause a significant drop in property values throughout the region as the abandoned property falls into a state of disrepair from vandalism and fire.

Transportation

The DEIS states that the reuse and development of the site “would result in a significant and unavoidable impact” on the surrounding roadways and intersections, but that “through the implementation of potential mitigation measures, the overall impact may be reduced to levels comparable to those presented under the future No Action Alternative”. However, the narrow scope of mitigation measures identified in the report may not be adequate to accommodate the anticipated regional increase in traffic in the area due to the redevelopment of the site. The mitigation should encompass entire corridors that provide access to the site and not just focus on improvements at individual intersections. The number of trips that will be generated by this site along with the anticipated traffic increase in the region requires an expanded approach to mitigation in order to insure the success of the redevelopment of the former base.

0006-5

There was an operational air base in 2010, which is the baseline year for the purposes of this EIS. Therefore, the negative impact referred to in the comment would have been already present. In addition, the only on-site housing proposed under Alternative 3 is the Bucks County Housing Group (BCHG) Housing.

0006-5

0006-6

Text has been added to demonstrate the decline in overall aircraft operations over time. The baseline year provides a point of comparison to evaluate the potential impacts from the proposed action. The baseline year for the aircraft noise analysis is 2010, in which the former installation had its full complement of assigned aircraft. It is more likely that the public can generally remember the noise environment during 2010 than in 1978.

0006-6

0006-7

In the baseline year of 2010, the former installation had its full complement of assigned aircraft and hazardous wastes were managed accordingly. A statement has been added to the hazardous waste section (Sections 4.5.1.1, 4.5.2.1, and 4.5.3.1) under each alternative stating that the developer will be responsible for hazardous waste disposal, including for the civilian airport.

0006-7

0006-8

In Section 4.3.4.1, the text states "the school district lost students and Federal Impact Aid of approximately \$650,000 per year." It is also stated in Table ES-1 and Table 2-2 that "the loss of Federal Impact Aid would not be replaced through additional school tax revenue from development."

0006-8

0006-9

Under caretaker status, the property would be maintained, along with the fence line, as mandated by BRAC caretaker guidelines as outlined in the Department of the Navy Base Realignment and Closure Implementation guidance (Navy 2007b).

0006-9

0006-10

Text has been added to the EIS noting that the traffic analysis was done for specific intersections; however, it is expected that for improvements proposed at particular intersections that are on the same roadway, the improvements would apply to that entire roadway segment.

0006-10

**Comments on Specific Components**

Executive Summary

- It is recommended that the Executive Summary and Table ES-1 Comparison of Environmental Consequences be amended and updated based on revisions made in response to the comments received.

Introduction

- Page 1-10: On Table 1-2 Applicable Regulatory Requirements and Approvals: Clean Water Act: The Responsible Party/Status column has two similar statements (“Developer responsible for applying for and implementing provisions of the permit”); one has the qualifier (Alternative 3 only), the other does not. Why the difference?
- Page 1-10: On Table 1-2 Applicable Regulatory Requirements and Approvals: American Indian Religious Freedom Act of 1978, et al: The Responsible Party/Status column states that the Navy’s consultation is ‘on-going”; under the National Historic Preservation Act of 1966 is noted “Navy to conduct and complete Section 106 consultation process”. When will the consultation be complete on these two regulations?

Proposed Action and Alternatives

- Page 2-15 thru 2-32: Table 2-2 Comparison of Environmental Consequences: Why is this table located here? There is no mention of this information in the narrative at this point.

Affected Environment

- Page 3-2: Section 3.1.1 Baseline Land Use and Zoning: Second paragraph: There is a discrepancy concerning the number of entry points (three or five?).
- Table 3.2-13 shows the Earned Income Tax rate for residents to be 0.5 percent. It is 1.0 percent and is distributed equally between the Township and the Hatboro Horsham School District.
- Figure 3.3.1: The location of Simmons Elementary School is shown incorrectly. Simmons Elementary School has relocated from Limekiln Pike to former location of Keith Valley Middle School on Babylon Road.
- Page 3-32: Section 3.4.3 Road Network and Access: See comment #5 above. The number of entry points is not consistent.
- Page 3-37: Section 3.4.6 Safety Conditions: The report indicates that vehicle accident reports were reviewed for the period from January 1, 2010 to July 11, 2013. Typical practice is to obtain the crash data for the most recent full five-year period.

0006-11

The Executive Summary and Table ES-1 have been updated to match the updated language of the main text of the EIS.

0006-12

0006-11 Table 1-2 in the DEIS is now Table 1-3 in the FEIS. Table 1-3 has been updated to clarify the different responsible parties/statuses for the NPDES Permit. Text was revised to indicate that the qualifier "Alternative 3 only" related to the NPDES permit pertaining to discharges of stormwater associated with industrial activities (i.e., runway).

0006-12

0006-13

0006-12 Table 1-2 from the DEIS is now Table 1-3 in the FEIS. Under the National Historic Preservation Act of 1966, the U.S. Navy was required to complete Section 106 consultation prior to signing a ROD and transferring the property. See Section 106 correspondence in Appendix B. Text under "Responsible Party/Status" in Table 1-2 has been updated accordingly.

0006-13 Under the American Indian Religious Freedom Act of 1978, et al., these laws would be applicable if Native American resources of concern to federally recognized tribes are identified on the property. The Navy would consult under these acts if such resources are identified.

0006-14

Currently, none have been identified and text under "Responsible Party/Status" in Table 1-3 has been updated accordingly.

0006-15

0006-14

0006-15 This is the standard location for a Comparison of Alternatives table in an EIS. The Comparison of Alternatives table is a requirement per 40 CFR 1502.14 of the CEQ regulations for implementing NEPA.

0006-16

0006-17

0006-15

The text in Section 3.1.1 has been updated to correctly reflect the number of entry points to the runway and ancillary facilities.

0006-18

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0006-19

The table and text have been updated to reflect the corrected data regarding the Earned Income Tax rate and distribution between the Township and the Hatboro Horsham School District.

0006-17

Figure 3.3-1 has been updated to reflect the proper location of the Simmons Elementary School and associated text describing the location has also been updated.

0006-18

The text in Section 3.4.3 has been updated to correctly reflect the number of entry points to the runway and ancillary facilities.

0006-19

Text has been added to present additional accident data for the full five-year period.

- Page 3-42: Section 3.5.3.1 Underground Storage Tanks: There is no listing of underground storage tanks (whereas there is a listing of aboveground storage tanks (ASTs)). Recommend providing a table listing the location, capacity, contents, former use and status of the underground storage tanks that have historically been located at Willow Grove, as well as those that are currently active/known to exist. Recommend clarifying in the status column with an additional footnote that “closed” does not automatically imply “removed” and that if encountered during redevelopment, these tanks will be subject to investigation and remediation if previously unknown releases are discovered. Those tanks that have been removed should be identified. Additionally, recommend providing a cross-reference in text where oil water separators are discussed to Section 3.5.3.3.
- Page 3-43 Section 3.5.3.2 Oil/Water Separators: Recommend clarifying in the status column with an additional footnote that “closed” does not automatically imply “removed” and that if encountered during redevelopment, that the oil/water separators will be subject to investigation and remediation if previously unknown releases are discovered. Oil/water separators that have been removed should be identified.
- Page 3-45 Asbestos Containing Materials: The Draft EIS does not indicate if the ACM currently in place is being monitored or otherwise managed (such as under an Asbestos Management Plan). Recommend clarifying this situation.
- Page 3-45 Table 3.5-3 Summary of 2011 ACM and PACM Sampling Results: This table does not include all of the buildings/facilities where ACM or PACM was found. Recommend clarifying if all buildings were surveyed and providing a summary of the survey results.
- Page 3-45 Section 3.5.3.5 Lead Based Paint/Lead: Recommend clarifying which buildings and/or areas were surveyed for lead based paint or lead contamination and providing a summary of the survey results. For example, there is no discussion of lead contamination in soils adjacent to Building 21. Also, the Draft EIS does not indicate if the LBP currently in place is being monitored or otherwise managed (such as under a LBP Management Plan). Recommend clarifying this situation.
- Pages 3-46 through 3-48: In several instances, the reference used to document an environmental condition or evidence of contamination is the HLRA’s NAS-JRB Redevelopment Plan (RKG 2012) which is a planning document. Why isn’t the actual Navy source document used as a reference? These documents are readily available via the NAS-JRB Willow Grove Administrative Record.
- Page 3-47 Radon: Did the Navy take action to confirm the greater than 4.0 picocuries/liter 1999 radon concentrations in Building 601 and the 2001 radon concentrations in Building 137? Recommend clarifying why mitigation measures were not undertaken at these locations. The information presented in Table 3.5-5 for Building 137 is inconsistent with text in paragraph 4 of this subsection.

0006-20

Discussion in the EIS emphasizes tanks that currently exist. Section 3.5.3.1 (USTs) has been revised to clarify the inactive USTs that are known to remain at the base. Section 3.5.3.2 (ASTs) has been revised to clarify that the listed ASTs have been closed but not removed, and clarifies the meaning of "closed" (that the tanks are free of their contents and no longer regulated by PADEP). Any additional information that becomes available would be included in the FOST. For simplicity, the EIS has been revised to address oil/water separators (OWSs) only in Section 3.5.3.3; therefore, applicable information from Section 3.5.3.1 on OWSs has been moved to Section 3.5.3.3. Section 4.5 has been updated accordingly.

0006-20

0006-21

As for tanks, discussion in the EIS emphasizes OWSs that currently exist. Section 3.5.3.3 (OWSs) has been revised to clarify that the listed OWSs have been closed but not removed, and clarifies the meaning of "closed" (that the OWSs are free of their contents and the single OWS that was regulated as an UST is no longer regulated by PADEP). Any additional information that becomes available would be included in the FOST.

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0006-22

ACM in place is not currently being monitored or managed, as NAS JRB Willow Grove is not an active base. Per the Department of the Navy Base Realignment and Closure Implementation guidance (Navy 2007b), the buildings are periodically checked, but ACM is not specifically monitored or managed.

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Section 3.5.3.4 has been revised to clarify the 51 buildings where the 2011 survey identified ACM and ACM hazards. Numerical results of the ACM sampling are available in the technical report (Michael Baker, Jr., Inc. 2011a). ACM results also would be addressed in the FOST or as part of the deed transfer. Section 4.5 has been updated accordingly.

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Section 3.5.3.5 and Table 3.5-4 present the results of the 2011 LBP inspection for the 14 on-base housing buildings. Numerical results of the inspection are available in the technical report (Michael Baker, Jr., Inc. 2011b). Results of lead inspections also would be addressed in the FOST or as part of the deed transfer. No additional information concerning lead in environmental media (such as soil) was found during preparation of the EIS. Any additional information that becomes

available would be included in the FOST or as part of the deed transfer.

0006-25

The content and references throughout the Environmental Management section have been updated to include primary Navy source documents.

0006-26

Section 3.5.3.7 has been updated to clarify that confirmation sampling for Building 137 (in 2001) and the survey for Building 601 (in 1999) showed radon below the EPA action level of 4.0 pCi/L. The DEIS was inaccurate because the reference used was inaccurate. The inaccuracies have been clarified by reviewing the primary source of the results. Based on the updated results, no mitigation would have been required. Section 4.5 has been updated accordingly.



- Page 3-48 Section 3.5.3.8 Pesticides/Herbicides: What is the source of the statement that “Pesticide applications were made in accordance with the Federal Insecticide, Fungicide and Rodenticide Act...”? Note that this statement conflicts with the statement on page 4-72 Section 4.5.1.1 Pesticides which states that “documentation was unavailable relating to actual past use, spills or misuse of pesticides or herbicides on the installation”.
- Page 3-49 Section 3.5.3.9 Radioactive Materials Sites: Based on this description provided in this section, it is unclear how the conclusion presented in Table ES-1 of “No impact on the environmental related to radioactive material sites” was justified. The statement provided in the DEIS that the Navy will initiate scoping surveys for the sites in 2014 indicates that the potential impact of these materials is currently unknown. Additional information should be provided to support the “no impact” conclusion, and if mitigation measures were assumed to reach that conclusion, identify and provide an assessment of the proposed mitigation measures and how they will be monitored for effectiveness.
- Page 3-50 Section 3.5.4 Environmental Restoration Program: Recommend that a discussion be added to the FEIS clarifying that although the Navy is responsible for environmental cleanup, the Navy intends to complete cleanup to current use standards, which for NAS-JRB Willow Grove would be industrial use. Cleanup to current use (i.e., industrial use) standards trigger some potentially significant environmental impacts and costs during redevelopment, because the preferred alternative for reuse is a combination of mixed use including residential, retail, commercial and recreational. To use the property as currently configured in the preferred alternative, the HLRA and developer will likely be responsible for additional cleanup to ensure that the site does not present a risk to human health or the environment during the planned future use.
- Page 3-50 Section 3.5.4 Environmental Restoration Program: The DEIS includes an explanation of the Navy’s Environmental Restoration Program that appears to contain more detail about general regulatory processes and administrative actions than technical information about the IRP sites to support the Navy’s “no impact to the environment” conclusion for this resource area.

While we understand that the environmental cleanup being conducted by the Navy is not part of the proposed project because it would occur whether or not the site is redeveloped, it is still important that sufficient information be presented regarding how the proposed reuse/development will interface with the cleanup remedies presented in the DEIS.

To understand the impacts of reuse, at a minimum, the FEIS should contain the following information for each IRP site:

- a. Media of concern;
- b. Impacted area by media;
- c. Primary contaminants of concern by media;
- d. Investigation/cleanup work that remains;
- e. Identify what the cleanup remedy is (or is expected to be) including land use controls and the basis for the decision;
- f. Cleanup criteria that were (or are expected to be) applied;

0006-27

Section 3.5.3.8 has been updated to clarify that past pesticide use was performed in accordance with the base's Pest Management Plan and equivalent programs, which were based on federal and Navy requirements. Sections 3.5.3.8 and 4.5.1.1 have been updated to clarify recordkeeping for pesticide use. Records of pesticide use prior to 2001 remain unavailable.

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0006-28

Section 4.5, including impact conclusions and mitigation measures that carry forward to Tables ES-1 and 2-2, have been updated to clarify that there would be *no significant* impact from disposal and reuse of the NAS JRB Willow Grove property relative to radioactive materials sites.

Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable.

0006-29

0006-29

Thank you for your comment. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5. Also, see response to Comment 0006-31.

0006-30

0006-30

See response to Comment 0006-31.

0006-31

0006-31

Section 3.5.4 has been updated to include some limited additional information on contaminants of concern and affected media for IRP sites that are still being investigated and remediated. Section 3.5.4 refers the reader to current information available at the Horsham Township Library and its website:  
<http://www.horshamlibrary.org/WillowGroveNASindex.html>.

Section 4.5 has been updated to clarify that there would be *no significant* impact from disposal and reuse of the NAS JRB Willow Grove property relative to remedial sites because the CERCLA process and other regulatory requirements would be followed.

Section 4.5 discusses impacts from individual IRP sites with respect to the cleanup remedy, including land use controls and other reuse constraints, where known, for the projected future use of those areas. Information concerning the cleanup standards (e.g., future use as unrestricted vs. industrial/commercial) used to make remedial decisions for remedial sites has been incorporated into Sections 3.5.4 and 4.5 of the EIS where readily available. Some of the No Further Action and No Action decisions did not directly address specific cleanup standards because no contamination was found exceeding any standard used. The Navy will further address cleanup standards in the FOST/FOSL.

The cleanup of the IRP sites is documented within the CERCLA process. Environmental Notices, Restrictions, and Covenants regarding the environmental condition of property of specific parcels are contained in the document known as the Finding of Suitability to Transfer (FOST) and in the property transfer deed. The FOST and deed will have CERCLA hazardous substance notices, and covenants as applicable. Additional information on this topic has been added to Section 4.5.

- g. Whether “No Further Action” Determinations that were (or are expected to be) issued are restricted or unrestricted (i.e., whether contamination remains on site above unrestricted cleanup levels);
  - h. The potential impacts from proposed reuse/development activities, including future human and ecological receptors that may come into contact with contamination that remains onsite, if/how development might affect the final remedy for each site, the land use controls (if any) that could impact development as well as on-going operation and maintenance activities after site build-out and potential mitigation measures and monitoring measures to ensure that the mitigation is successful.
- Page 3-56 Table 3.5-6 Current Status of IRP Sites: Again the information in this table references the RKG 2012 NAS-JRB Redevelopment Plan as the source for information. Should the source be a Navy document such as the FY 2013 Site Management Plan for NAS-JRB Willow Grove?
  - Page 3-90 Section 3.9.2 NRHP-Listed or –Eligible Historic Properties. It is unclear what impacts the deed restrictions and covenants imposed on the property recipient will be. It is not possible to assess impacts without those details. Additional information should be provided to support the “*no adverse effect with mitigation*” conclusion. Recommend that the Navy identify the mitigation measures assumed to reach that conclusion, identify and provide an assessment of the proposed mitigation measures and how they will be monitored for effectiveness.
  - Page 3-90: Section 3.9.3 Native American Resources: When will the consultation with the ‘appropriate Native American groups’ be completed?
  - Page 3-107 Section 3.11.5.2 Wetland Assessment: The Draft EIS Report notes that the wetlands assessment resulted from a desktop analysis and an on-site survey but the USACE has not made a jurisdictional determination confirming the wetland boundaries. Without a firm determination of wetlands boundaries, it is impossible to adequately assess direct environmental consequences of potential mitigation or indirect consequences of using the wetlands as receiving bodies for stormwater runoff with respect to water quality issues. It is recommended that the information developed during the EIS process be formally submitted to the USACE for a jurisdictional determination of the wetland boundaries.

#### Environmental Consequences

- Page 4-7 Section 4.1.1.4 Surrounding Existing Land Uses and Consistency with Comprehensive Plan and Zoning: It is noted that Warrington Township’s Comprehensive Plan (2006) recommends that new commercial development should not be added along Easton Road over a 10-year period between 2008 and 2018. However, in 2012, Warrington Township approved a 67 acre mixed use project including big box, pad sites and small shop retail uses.

0006-31 cont'd

0006-32

The content and references throughout the Environmental Management section have been updated to include primary Navy source documents.

0006-31  
Continued

0006-33

See Section 4.9.1, under Alternatives 1 through 3, for the impacts that deed restrictions and covenants would impose on the property recipients. See Section 106 correspondence in Appendix B for mitigation measures and how they will be monitored for effectiveness.

0006-32

0006-34

Consultation with the "appropriate Native American groups," consisting of three federally recognized Indian tribes (the Delaware Nation, Oklahoma; the Delaware Tribe of Indians; and the Stockbridge-Munsee Community of Wisconsin), was conducted as part of compliance with Section 106 of the National Historic Preservation Act of 1966. Under the National Historic Preservation Act of 1966, the U.S. Navy was required to complete Section 106 consultation prior to signing a ROD and transferring the property. See Section 106 correspondence in Appendix B.

0006-33

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0006-35

A jurisdictional determination is the responsibility of the developer based on the design for the districts at the former installation. For the purposes of satisfying NEPA and presenting an analysis in the EIS, a planning-level wetland assessment was performed to identify wetland locations and to quantify their size. The wetland assessment was performed on the entire property, not just at sample sites. The on-site wetland assessment identified more than 11 acres of additional wetlands than were identified during the desktop analysis and is a comprehensive assessment of the wetlands on the property.

0006-35

0006-36

In addition, a jurisdictional determination is valid for five years. The Navy's wetland assessment was performed in spring 2013, and therefore, the developer would most likely require a jurisdictional determination during the 20-year build-out of the site. The information presented in the EIS can inform the HLRA and the developer of the location and size of wetlands to assist in their design of building locations and to avoid wetlands to the greatest extent possible. The HLRA's Redevelopment Plan states that "The report concludes with the final preferred land use plan, which captures the general land vision for the property." Therefore, the specific locations of buildings and other infrastructure can theoretically be shifted within the property to avoid or minimize potential impacts while preserving the land vision for the property in terms of the mix of land uses and level of development.

0006-36

The text in Section 4.1.1.4 has been updated to reflect that, although Alternative 1 would be indirectly inconsistent with the Warrington Township Comprehensive Plan Update, it would be consistent with the current Warrington Township zoning ordinance as it is currently zoned as "Central Business District." Central Business District allows for new development if it provides for a mixed-use area that includes residential and non-residential uses, preserves existing natural amenities, and promotes interconnections with adjacent properties.

- Page 4-16 For Alternative 3 (Airfield Use), it is stated that Approved Public Benefit Conveyances would be similar to those under Alternative 1 (HLRA Redevelopment Plan). Is the school use (one of the PBC’s approved for inclusion in Alternative 1) compatible with an airfield use? If not, a statement should be included that highlights that not all PBC’s approved for Alternative 1 are appropriate for use in Alternative 3. Likewise the BCHG housing, recreation center and hotel conference center should be reviewed.
- Page 4-27 Section 4.2.15 Environmental Justice and Protection of Children: Various statements are included that the Navy has determined that certain census tracts are different than the ‘community of comparison’. It is unclear what is defined as the ‘community of comparison’.
- Pages 4-42 and 4-46 Typo: Section 4.3.2.5 and Section 4.3.3.5: Both paragraphs discussing the Aviation Museum include statements that the facility would remain under “Alternative 1”; each paragraph should reflect “Alternative 2” and “Alternative 3”, respectively.
- Page 4-55 Table 4.4-4 “Typo”: One of the blocks in the table should be color-coded light red (but is not).
- Pages 4-55 and 4-61: Tables 4.4-4 and 4.4-8: PennDOT criteria require mitigation strategies to improve the level of service to No Build conditions. Therefore, the 10 second rule would not apply for the mitigation scenario. It appears that additional improvements would be required at some of the intersections.
- Page 4-115 Section 438 (EISA of 2007): Possible typo/extra word in second paragraph: At the end of the second sentence, ‘Navy Lodge property’ should probably be just ‘Navy property’.

Cumulative Impacts

- Page 5-7 Section 5.3.1 Federal Actions – Disposal and Reuse of Shenandoah Woods and Jacksonville Roads Housing Areas: The redevelopment plan for Shenandoah Woods also includes a portion of the site to be conveyed to Warminster Township via a public benefit conveyance (PBC) through the U.S. Department of Interior’s Federal Lands to Parks Program for stormwater management improvements.
- Page 5-8 Section 5.3.2 Non-Federal Actions – Redevelopment of the Horsham Valley Golf Club: Note that the developer of the property is now Toll Brothers The Cutler Group sold the property to Toll Brothers.
- Page 5-8 Section 5.3.2 Non-Federal Actions: It is unclear whether the traffic associated with the Non-Federal Actions identified in this section of the report was included in the traffic analysis. If volumes are available for these nearby developments, they should be included in the analysis in addition to the overall PennDOT growth rate.

0006-37  
Based upon lands allocated to the runway, runway setbacks, and aircraft operational areas, all of the features present in Alternative 1 would not physically fit into spaces available under Alternative 3. A statement was added to Section 2 indicating that not all Public Benefit Conveyances (PBCs) approved under Alternative 1 are incorporated into Alternative 3 due to various constraints.

0006-38  
Section 4.2 has been clarified with respect to the community of comparison used in the environmental justice analysis.

0006-39  
Sections 4.3.2.5 and 4.3.3.5 have been revised as appropriate.

0006-40  
Table 4.4-4 shading has been revised as identified.

0006-41  
Tables 4.4-4 and 4.4-8 of the DEIS have been revised to include a phased development analysis. In the FEIS, these tables are now 4.4-3 and 4.4-6. Some intersections have been identified where additional improvements would be required beyond those proposed in the EIS to accommodate the potential increases in traffic. The working group suggested by PennDOT, which would be comprised of representatives from each stakeholder group, would be able to continue to study these intersections and/or design the site in a manner to further address traffic concerns.

0006-42  
The text in Section 4.8.1.3 under Section 438 of the EISA of 2007 has been revised as identified.

0006-43  
Text has been added to Section 5.3.1 that discusses the redevelopment plan for Shenandoah Woods, including the portion of the site that is to be conveyed to Warminster Township. This conveyance would be via a public benefit conveyance (PBC) through the U.S. Department of the Interior’s Federal Lands to Parks Program for stormwater management improvements.

0006-44

The text in Section 5.3.2 has been revised to clarify that the current developer of the Horsham Valley Golf Club property is Toll Brothers.

0006-45

Specific traffic volumes for Non-Federal Actions (Section 5.3.2) were not available. Through the incorporation of the PennDOT background growth factor specific to Montgomery County into the traffic analysis, it is assumed that the types of development outlined in this section would be accounted for in this level of background growth.

Mr. Gregory Preston  
February 7, 2014  
Page Eight

Appendices - Appendix C: Traffic Assessment Study

- The traffic analysis only focused on intersections immediately adjacent to the proposed redevelopment site. Intersections along S.R. 0611 (Easton Road) south to the Pennsylvania Turnpike interchange should be included in the analysis. Additionally, intersections along Norristown Road, Horsham Road, and County Line Road should be added to the analysis, as they are major routes connecting the surrounding areas to the proposed site.
- The internal trip capture rate calculations appear incorrect. The “balanced” demand volume should be the controlling value, i.e. the lower value. It appears that the higher value was used on several occasions, thereby increasing the calculated overall internal capture rate.
- In order to be conservative, the peak hours of each individual intersection should be used for the level of service analysis, rather than an overall system peak hour.
- The identified mitigation measures are provided on an individual intersection basis, rather than an overall improvement plan for the area. For example, rather than providing additional through lanes at individual intersections along S.R. 0611 (Easton Road), corridor widening should be proposed, at a minimum, from the redevelopment site to the Pennsylvania Turnpike interchange to provide an additional lane in each direction to accommodate the anticipated increase in traffic.

Again, Thank you for the opportunity to comment on the draft EIS. Please feel free to contact me to discuss the above.

Sincerely,



Michael J. McGee  
Executive Director

0006-46

Based upon the recommendation from PennDOT in their comment letter on the Draft EIS, the intersection at Maryland Road and Easton Road (SR 611) was added to the analysis. Text and tables in Sections 3.4 and 4.4 were revised accordingly.

0006-46

The transportation analysis conducted in support of the Final EIS evaluated 16 intersections. The developer will be required to comply with the site plan approval process, which may require additional studies. In addition, the developer should coordinate with PennDOT in order to determine additional impacts and potential mitigation measures, as well as acquire appropriate approvals and permits.

0006-47

0006-47

Many aspects of the transportation analysis used conservative estimates with respect to vehicle trips (i.e., the application of the full PennDOT

0006-48

background growth factor and no additional factor used to reduce vehicle trips for transit and other modes), and the LOS for the majority of the intersections analyzed were degraded to an F. A more

0006-49

conservative internal capture rate calculation would result in additional trips, but would not substantially affect the resulting LOS at these degraded intersections. The same, or similar, mitigation measures would be necessary to address the potential traffic-related impacts to the local roadways.

0006-48

The system peak hours were selected based upon the majority peaks for the intersections being analyzed. The individual intersection peaks for both AM and PM either coincided with the system-wide peaks or overlapped by 15, 30 or 45 minutes. Due to the connectivity of the intersections being analyzed over primarily two roadways (Horsham Road and Easton Road), the system-wide peak for AM and PM was utilized. Several conservative factors were used in the transportation analysis and using the peak hour for individual intersections would not substantially affect the resulting LOS.

0006-49

Additional language in Section 4.4 explains that where additional through lanes are the proposed, potential mitigation measure at two intersections on a connected road, it is assumed that the roadway segment between those intersections would be widened as well. These measures are visually depicted on Figure 4.4-3. This primarily applies to Easton Road and Horsham Road.

From: Judith Memberg [<mailto:jmemberg@genesishousing.org>]  
 Sent: Wednesday, January 15, 2014 11:38  
 To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
 Subject: Willow Grove Public Comments

I attended the EIS open house for the Willow Grove Base and wanted to submit a few comments:

- 1) The homeless housing project was labeled Bucks County Housing Group on the maps. Please note that this project is a joint proposal from Genesis Housing Corporation, The Reinvestment Fund and the Bucks County Housing Group.
- 2) All the proposed options, except the "do nothing option", included the housing for the homeless project. We are very appreciative of this and look forward to developing these homes.
- 3) The homeless project proposal would demolish the existing buildings on the site. Did the EIS assume that these buildings would be removed?
- 4) Was any new environmental information reported for these buildings or the surrounding land?

Judith S. Memberg  
 Executive Director

Genesis Housing Corporation  
 PO Box 1170  
 208 DeKalb Street  
 Norristown, PA 19401  
 610-275-4357 phone  
 610-275-1357 fax

0007-1

Text has been revised in Section 2 to clarify that this is a joint proposal from the Genesis Housing Corporation, The Reinvestment Fund, and the Bucks County Housing Group. For the purposes of the EIS, it will be referred to as the Bucks County Housing Group (BCHG).

0007-2

Thank you for your comment.

0007-1

0007-3

Text in Section 2, under Alternative 1, has been revised to indicate that two facilities would be reused and all other installation buildings would be demolished.

0007-2

0007-4

Environmental management information (e.g., hazardous materials and wastes) is presented in Sections 3.5 and 4.5 of the EIS. Additional information is available in the Environmental Condition of Property (ECP) report.

0007-3

Any new information obtained following the EIS would be included in the FOST or as part of the deed transfer.

0007-4



[www.geneshousing.org](http://www.geneshousing.org)

Visit us on Facebook!

[www.facebook.com/GenesisHousing](http://www.facebook.com/GenesisHousing)

**Statement of Concern:** Environmental Impact Statement (EIS) regarding reuse of the former Willow Grove Naval Air Station.

Many, if not most, residents of Horsham Township and neighboring communities – Hatboro, Ambler, Chalfont, and North Wales - will welcome the long overdue construction and redevelopment of the land, 8% of the township's acreage, resulting from closure of the Willow Grove Naval Air Station. The human and business potential of the implementation of plans by the Horsham Land Redevelopment Agency (HLRA) will be realized over generations. The building of nature and conservation parks, retail businesses, a town center, an aviation museum and other proposed projects will create long term employment in a time of sluggish economic recovery. Shifting tax burdens, creation of capital, dependable and growing work opportunities can only increase Horsham's high profile rating as one of the most desirable places to live in America.

However, in the midst of anticipation for whatever plan or alternative template for redevelopment is approved, there is another issue that has not been part of these considerations and that is the current establishment, without public hearing, of the UAV [Unmanned Aerial Vehicle] / Reaper Drone Command Center at the Horsham Air Guard Station

The Horsham Air Guard Station is directly adjacent to the acreage under re-development consideration.

The drone command center will computer "pilot" remote-controlled drone strike missions thousands of miles from the Horsham Air Guard Station. That, however, won't remove the area within question, nor surrounding areas, from the potential risks and dangers of having a neighboring drone war command center in walking distance from proposed construction.

Drone command personnel in Horsham will direct armed airborne drones and execute drone missile strikes on people around the world. Reports documenting civilian casualties in Pakistan, Yemen, Somalia, and other countries, have created animosity and resentment towards the United States. In fact, the drone command center will operate as an integral part of the "war on terror" and it is therefore a viable target as such.

Redevelopment is long overdue and welcome but do we want a thriving community where families can live, work, and play, in proximity to a silent, computerized drone war zone and potential target?

The ethical and legal issue of drone warfare and remote-controlled killing has become an ongoing debate around the world. The issue of public safety is no less real, here in Horsham Township and surrounding areas, requiring public hearing, consideration, and debate in the face of the dangers posed by the establishment of the drone command center at the Horsham Air Guard.

Brandywine Peace Community, 610-544-1818, e-mail: [brandywine@juno.com](mailto:brandywine@juno.com)  
BuxMont Coalition for Peace Action, e-mail: [cpabuxmont1@aol.com](mailto:cpabuxmont1@aol.com)

(Representing a host of area community groups concerned about the establishment of the Drone War Command Center at the Horsham Air Guard Station.)

0008-1

0008-1

Thank you for your comment. The Ground Command Center at the Horsham Air Guard Station is outside the scope of the EIS.

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(Representing a host of area community groups concerned about the establishment of the Drone War Command Center at the Horsham Air Guard Station.)

0009-1

0009-1

Thank you for your comment. The Ground Command Center at the Horsham Air Guard Station is outside the scope of the EIS.



# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

You are invited to comment on the Draft EIS. To be most helpful, comments should be clearly written and describe specific issues or topics. 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 meeting, (2) speak your comments to the court reporter before leaving the meeting, (3) mail your comments (see address below), (4) e-mail your comments to gregory.preston@navy.mil, or (5) fax comments to (215) 897-4902.

Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

*Has current plan been voted upon by community? Prefer more open space, parks, Wildlife Areas. Has anyone considered the wildlife on the property? What will happen to the animals? Why not use some of space for VA facilities residence for homeless veterans? Being a former military base, this would only be fair. Suggest limiting residences, stores, restaurants. We have houses on horizon that remain on the market. There is a plethora of malls + restaurants in the area. Just look up + down 611. Would 1 of facilities built be a rec. center for TWP use seniors, children, groups. Other communities have comprehensive centers.*

0010-1

0010-2

0010-3

0010-4

0010-5

0010-1  
The preparation of the HLRA Redevelopment Plan (Alternative 1) was a public process. For more information on the Redevelopment Plan, please refer to the HLRA.

0010-2  
Please refer to Sections 3.12.2, 4.12.1, 4.12.2, 4.12.3, and 4.12.4 of the EIS for a discussion of wildlife existing at the former installation property and potential impacts under each alternative analyzed.

0010-3  
Final reuse of the property will ultimately be determined by the HLRA and the EIS analyzes the HLRA preferred redevelopment plan (Alternative 1) and other related uses for the former installation property.

0010-4  
Final reuse of the property will ultimately be determined by the HLRA and the EIS analyzes the HLRA preferred redevelopment plan (Alternative 1) and other related uses for the former installation property.

0010-5  
Please refer to Section 2.3 for a description of the alternatives considered in the EIS, including a description of the proposed Regional Recreation Center. In addition, Sections 3.3 and 4.3 discuss existing recreational facilities and potential impacts under each alternative analyzed.

0010-6  
Thank you for your comment. As part of the Final EIS, a summary of public comments will be included along with how those comments were addressed.

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name TERESA ANTONACCI

2. Address 330 Summer Av. Horsham PA 19044

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 keep residents informed so they can attend any meetings.*

0010-6

Please drop this form into one of the comment boxes here at the PUBLIC MEETING or mail to:

Director, BRAC Program Management Office East, Attn: Willow Grove EIS  
4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303  
www.willowgroveeis.com

## YOUR INPUT MATTERS



# Public Meeting Comment Sheet

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Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

- Alternative #1 is the best use.

- Federal taxpayers (us) paid for the property once. Instead of getting money for land use these funds to improve the roads to get ready for the development.

- Need to see something soon. It looks so bad right now.

- Thank you HLKA

0011-1

0011-1  
Thank you for your comment.

0011-2

0011-2  
Thank you for your comment.

0011-3

0011-3  
Thank you for your comment. Completing the EIS (and thereby the NEPA process) is one of several steps required to transfer the property for redevelopment. The property will be transferred as soon as the required steps are achieved.

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name \_\_\_\_\_

2. Address \_\_\_\_\_

3. E-mail \_\_\_\_\_

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 MEETING or mail to:

Director, BRAC Program Management Office East, Attn: Willow Grove EIS

4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303

[www.willowgroveeis.com](http://www.willowgroveeis.com)

## YOUR INPUT MATTERS



# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of  
Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

0012-1  
Thank you for your comment.

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Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

I did not want the airfield to exist at all  
Never want an airport again.  
HLRA Alternative #1 is the best for  
Horseshoe.  
  
Thank you.

0012-1

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name \_\_\_\_\_
2. Address \_\_\_\_\_
3. E-mail \_\_\_\_\_
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 MEETING or mail to:

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4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303  
[www.willowgroveeis.com](http://www.willowgroveeis.com)

## YOUR INPUT MATTERS

Sunday, February 09, 2014

From: John Benton  
383 Marilyn Rd  
Warminster, PA  
18974  
Telephone [REDACTED]

To: BRAC Program Management Office East  
ATTN: WILLOW GROVE EIS  
4911 SOUTH BROAD STREET  
BLDG 679  
PHILADELPHIA, PA 19112-1303

Subj: Willow Grove Draft EIS comments

I spent 21 years on active duty with the US Navy, including three flying tours at NAS Willow Grove, and have lived and worked in Horsham and Warminster for 29 out of the past 33 years. I am currently living in the house that I lived in when I retired from the US Navy in 1995, and do not foresee moving out of the area at any point in the future.

Regards the Willow Grove Draft EIS, this is what I see:

Table ES-1 summarizes and compares the environmental impacts of the 4 alternatives.

Alternatives 1 & 2 would cost new owners/developers over \$925 million dollars to see fruition as idealized. The resulting increase in population would be between 3500 and 4500 new residents. New housing would mean between 1500 and 2000 new housing units are built. Some 10,000 new jobs would result, where, for how long, and at what general wage scales are not given. It is noted that auto traffic in the surrounding area will increase exponentially regardless of what alternative is chosen, however, Alternatives 1 & 2 indicate in excess of 35,000 new auto movements per day, which will significantly increase congestion at already congested intersections. The increased demand of between 668,000 and 765,000 gallons of water PER day will overwhelm what the local water authority is able to provide. Corresponding increases in waste water may NEVER be adequately dealt with (alternative 2, pg. ES-16). Significant increases in demand for electricity appear manageable by PECCO.

Compared to Alternative #3, Alternatives 1 & 2 are forecast to generate around 10,000 new jobs, of unknown duration, wage scale, and job type. Given already the already significant number of vacant industrial and commercial buildings in the area, how many of these 10,000 new jobs will actually be created in, or near Horsham? (ES-1, pg. ES-8)

Compared to Alternative #3, Alternatives 1 & 2 are forecast to add between 570 and 800 new students to the local school system, as opposed to only 53 for Alternative #3. Table ES-1, pg. ES-9, under alternative #2 goes so far as to state that construction of a new middle school would be even more necessary to handle the increased student population.

Alternative #3, according to Table ES-1, pg. ES-13, would result in slightly less "operational" emissions as opposed to alternatives 1 & 2; however there would be an increase in mobile emissions due to aviation operations. It is interesting to note that all three, alternatives 1, 2, & 3 would see increased vehicular mobile emissions. Not more for alternative #3 than the first two alternatives.

Alternative #3, compared to the first two alternatives would require less than a third of the demands upon natural resources than Alternatives 1 & 2. Alternative #3 would only require around 200,000 gallons of water per day. (Table ES-1, pg. ES-15)

Regards noise, per Table ES-1, pg. ES 14-15: Alternative #3 would generate somewhat LESS noise from auto and truck traffic than either of the first two Alternatives.

Noise caused by aircraft operations (detailed on pg. 3-71, tables 3.7-8, and pg. 3-64 Table 3.7-1, will impact only 18 acres off site, to the tune of 65 dB, with the most likely area of exposure being the corner of Maple Avenue and Easton Road, directly underneath the final approach to Runway 33. 65 -70 dB is described as being "intrusive, telephone use difficult". We're talking about 18 acres where conversation could be difficult at times, but no risk of hearing damage or anything worse! Note that Table ES-1, pg. ES-24 states that aircraft noise levels will be less than those measured in 2010, which was well after NAS Willow Grove's peak level of aircraft operations. In fact, there were only three flying units left on the base in 2010, with a total of around 30 aircraft, and transient aircraft traffic was significantly less than during the base's peak operational years.

0013-1

Thank you for your comment. No change required to document.

0013-2

The EIS analyzed the proposed Redevelopment Plan (Alternative 1) and related alternatives to that plan. The number of jobs estimated was based upon the amount of commercial and retail space proposed under each alternative. A real estate market analysis was conducted by the HLRA during the preparation of the Redevelopment Plan. It is presented in Chapter 7 of the Redevelopment Plan and covers the residential, office, industrial, and retail markets. Of the approximately 10,000 jobs, about 7,500 are considered "direct" jobs that would be located on the former installation property and within Horsham Township, while the balance would be considered "indirect and induced" jobs that would be located outside the former installation property and within the surrounding municipalities. However, it should be noted that full development is estimated to occur over a 20-year period and market conditions and general economy performance will dictate how quickly the property is built out.

0013-1

0013-3

Thank you for your comment.

0013-4

Thank you for your comment.

0013-5

0013-2

Thank you for your comment.

0013-6

0013-3

Thank you for your comment.

0013-7

0013-4

Thank you for your comment.

0013-5

0013-6

0013-7

From Horsham Township's perspective, Alternatives 1 or 2 are forecast to generate between \$15.6 and 16.9 million dollars of tax revenue, whereas Alternative #3 would generate only \$4.2 million dollars of tax revenue.

The bottom line, in my viewpoint is that Alternatives 1 & 2 will clearly place the greatest stress upon existing natural resources, and community infrastructure, such as roads, traffic control, power, water, and natural gas distribution. Instead of preserving open space and natural resources, new residential and commercial construction will destroy them. Alternative #3 may require some new construction, but the demands upon natural and community infrastructure will be a fraction of what Alternatives 1 & 2 will require. One only needs to look at any number of once bucolic areas around the Philadelphia area to see significant increases in congestion. Easton Road north of County Line Road was once all woods and farms on both sides of the Easton Road. Now, all that natural beauty is gone replaced with shopping centers, movie theaters, big box retailers, congested traffic, and more. Frankly, if either Alternative 1 or 2 is permitted to happen, then Horsham will look just like Warrington, and there will be no identity between the two townships.

Alternative #3 will require improvements in infrastructure because the base was largely self-sufficient, but you will not see the wide spread destruction of natural resources because the airfield, parking aprons, hangars, and airfield perimeter fencing are still intact.

This leaves us with Alternative #4 to discuss. Leave the base in a caretaker status. As a thirty-plus year supporter of the Delaware Valley Historical Aircraft Association, I would want to see the DVHAA remain in place and allowed to continue to operate, even expand into one of the existing, unused hangars if that could be agreed upon.

While Alternatives 1 or 2 may provide substantially more property and local income taxes than Alternative # 3, Alternative # 3 would require only a third, or less, of the resources made possible by collection of those taxes. Less traffic, less construction, less infrastructure improvements, fewer students added to the school system, etc. And there would be less noise generated by aviation operations than there was near the end of the base's operational history. Don't forget that the construction costs forecast in Table ES-1, pg. ES-8 are around 1/3<sup>rd</sup> for Alternative 3, of what they would be for Alternatives 1 or 2. This further supports the notion that more significant tax income for Horsham Township would be required to provide required services.

Finally, it is no secret that the HLRA would like to see Horsham Township acquire, at NO COST, full and complete ownership of the 900 or so acres up for disposal by the federal government. In these times of nightmarish federal deficits, GIVING away federal property, particularly a piece of property as large and valuable as this is, should NOT even be a consideration. **If the land must be disposed of, it should be sold at market value, and every cent of the proceeds from the sale/s should be returned to the US Treasury.** As a taxpayer, I am all for making prudent choices to reduce the national debt. Giving Horsham Township title to the base property at no cost is not prudent.

Very Respectfully,

John N. Benton

Warminster, PA

0013-8

0013-8

0013-9

Thank you for your comment.

0013-9

Thank you for your comment.

0013-10

Thank you for your comment.

0013-10

0013-11

Thank you for your comment.

0013-11

0013-12

Thank you for your comment.

0013-12

0013-13

Thank you for your comment. The property transfer process, and any associated payment, is separate from the NEPA analysis and this EIS.

0013-13





# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of  
Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

0014-1  
Thank you for your comment.

You are invited to comment on the Draft EIS. To be most helpful, comments should be clearly written and describe specific issues or topics. 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 meeting, (2) speak your comments to the court reporter before leaving the meeting, (3) mail your comments (see address below), (4) e-mail your comments to gregory.preston@navy.mil, or (5) fax comments to (215) 897-4902.

**Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.**

Although the Air Field is not going to be a true Alternative for the property, I still believe it to be the quickest and most lucrative revenue producing avenue. I also love that the Aviation Museum continues to be part of the land reuse. It is such a great local attraction that will bring people to Horsham for the ~~etc~~ education and historical significance of the property. The museum will keep the history alive for future generations

0014-1

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name Virginia Brooke
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 MEETING or mail to:

Director, BRAC Program Management Office East, Attn: Willow Grove EIS  
4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303  
[www.willowgroveeis.com](http://www.willowgroveeis.com)

## YOUR INPUT MATTERS



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Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

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I am in agreement with plan #1 however I do not think there is enough entrance or egress within the property. I understand traffic will increase but there needs to be options for it to facilitate movement. I also have concerns with the idea of retail on the plot of the intersection of current Maple & Easton. I don't feel there is enough land. Plan #2 has some more traffic movement but the circle is a back out/delayed idea. I like the pedestrian path in plan two might be nice to figure out how to

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2. Address

3. E-mail

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

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## YOUR INPUT MATTERS

0015-1

Thank you for your comment.

0015-2

Thank you for your comment. The EIS analyzed the HLRA's preferred Redevelopment Plan (Alternative 1) and related redevelopment plans. The HLRA's Redevelopment Plan states that "The report concludes with the final preferred land use plan, which captures the general land vision for the property." Therefore, the specific locations of access and internal roadways can theoretically be shifted within the property to avoid or minimize potential impacts, while preserving the land vision for the property in terms of the mix of land uses and level of development. The specific design and build-out, along with the roadway network, will be determined by the HLRA and the developer in coordination with local municipalities and agencies.

0015-1

0015-2

PLEASE PRINT

0015-2 cont'd

0015-2  
Continued

join it to our current parks and powerline trail.  
I am biased and walk the trail everyday.

I am in favor of the additional housing in plan #2  
but it does not appear to be using as much ground  
dedicated to single housing as plan #1

Instead could you use the housing layout from  
plan 0N but make them half acre plots (even 3/4 acre)  
in a price range of 400-600 instead of

800-1,000,000

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**YOUR INPUT MATTERS**



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I AM A RESIDENT, VOTER + TAX PAYER IN MONTGOMERY COUNTY, PA AND REMAIN DEEPLY CONCERNED ABOUT THE D.O.D.'S OPERATION OF A DRONE COMMAND CENTER ADJACENT TO THE PROPERTY IN QUESTION. - THAT IS THE LAND FOR REDEVELOPMENT. HORSHAM AND THE CITIZENS FROM THE REST OF THE STATE HAVE NOT BEEN AFFORDED AN OPPORTUNITY, IN A PUBLIC PLACE, TO QUESTION AUTHORITIES REGARDING WEAPONIZED DRONES BEING OPERATED OVERSEAS. AND THAT THE MEN AND WOMEN SURVEILLING PEOPLE OVERSEAS, TARGETING THEM, AND KILLING THEM FROM A LOCATION UP THE ROAD FROM ME - IS DISTURBING AT REST. WE ARE NOT AT WAR WITH THE COUNTRIES - CONT'

0016-1

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

- 1. Name EMILY COOK
- 2. Address MONTGOMERY COUNTY, PA
- 3. E-mail \_\_\_\_\_
- 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 MEETING or mail to:

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www.willowgroveeis.com

## YOUR INPUT MATTERS

0016-1

Thank you for your comment. The Ground Command Center at the Horsham Air Guard Station is outside the scope of the EIS.

PLEASE PRINT

0016-1 cont'd

0016-1  
Continued

THAT WILL HAVE DRONES, OPERATED FROM  
MORSHAM, SURVEILLING THEM/AND/OR  
KILLING THEIR CITIZENS. THIS INCLUDES  
YEMEN, AFGHANISTAN AND PAKISTAN.

ALTHOUGH REDEVELOPMENT IN TOWN IS  
WELCOME, I OBJECT TO THE MORSHAM  
AIR GUARD CENTER STATION BEING  
COMMITTED TO PILOTING WEAPONIZED DRONES  
OVERSEAS. THE D.O.D. IS NOT A GOOD  
NEIGHBOR WITH RESPECT TO NO PUBLIC  
MEETING ON THIS PIECE OF THE COMPOUND.

Please drop this form into one of the comment boxes here at the PUBLIC MEETING or mail to:

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4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303

**YOUR INPUT MATTERS**

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 :  
 U.S. NAVY :  
 FOR THE DRAFT ENVIRONMENTAL :  
 IMPACT STATEMENT FOR THE :  
 DISPOSAL & REUSE OF THE :  
 FORMER WILLOW GROVE PROPERTY:  
 :  
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- - -  
 Monday, January 13, 2014  
 - - -

PUBLIC MEETING was taken at the  
 1025 Horsham Road, Horsham, Pennsylvania 19044,  
 before Serena A. Spotts, a Notary Public of the  
 Commonwealth of Pennsylvania, on the above date,  
 commencing at 5 p.m.

STREHLOW & ASSOCIATES  
 COURT REPORTERS - VIDEOGRAPHERS  
 258 SOUTH STATE STREET  
 REAR BUILDING, FIRST FLOOR  
 NEWTOWN, PENNSYLVANIA 18940  
 WWW.STREHLOWCOURTREPORTING.COM  
 (215) 504-4622 FAX (215) 504-7155

0017-1

Thank you for your comment. The Ground Command Center at the Horsham Air Guard Station is outside the scope of the EIS.

1 thought.

2 The other thing I had was, these  
3 million dollar homes you're talking about  
4 up there, if the Army brings helicopters  
5 in, you're going to have a helicopter  
6 flying over your house. I don't think  
7 these people are going to like that.

8 That's it.

9 - - - - -

10 ATTENDEE: My name is  
11 Emily Cook, E-M-I-L-Y, C-O-O-K. I'm from  
12 Montgomery County, Pennsylvania. I'm a  
13 resident, voter, and tax payer in  
14 Montgomery County and remain deeply  
15 concerned about the DOD's operation of a  
16 drone command center adjacent to the  
17 property in question, the land for  
18 redevelopment.

19 Am I speaking too fast?

20 Horsham and citizens from the  
21 rest of the state have not been afforded an  
22 opportunity in a public place to question  
23 authorities regarding weaponized drones  
24 being operated overseas, and that the men

0017-1

1 and woman surveilling people overseas,  
2 targeting them and killing them from a  
3 location up the road from me is disturbing  
4 at best.

5 We are not at war with the  
6 countries in question that will have said  
7 drones operating from Horsham, surveilling  
8 them, and/or killing their citizens. This  
9 includes Yemen, Afghanistan, and Pakistan.

10 Although redevelopment in town  
11 is welcome, I object to the Horsham Air  
12 Guards Station being committed to piloting  
13 weaponized drones overseas. The DOD is not  
14 a good neighbor with respect to no public  
15 hearing on this piece of the compound.

16 And I would like this paper  
17 (indicating) to be included in the record  
18 also.

19 - - - - -

20 ATTENDEE: This is [REDACTED],  
21 [REDACTED] I work with the Brandywine  
22 Peace Community, and a concern came up. A  
23 concern has arisen that, although there is  
24 a lot of folks who welcome the



0018-1

Thank you for your comment.

0018-2

Thank you for your comment. The 45-day public comment period is standard per CEQ regulations for implementing NEPA; however, any comments that may have been received following the end of the public comment period on February 10, 2014, have been considered and included in the Final EIS.

0018-1

0018-2

From: Lori [REDACTED]  
Sent: Monday, February 10, 2014 22:31  
To: [mail@hlra.org](mailto:mail@hlra.org); Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: WG Airbase Reuse Comment

I would like to see option 3 put in place, airfield reuse. There are too many shopping malls, residential developments, etc already. Take a look around... there are so many vacant buildings, there is already a substantial development project underway immediately up the road. The other two options would ruin Horsham as a hometown. An airbase would be very beneficial to the community in many ways. Option 3 would also allow critical, vital, undeveloped land to remain.

On another note:

I know many people were not aware of this open comment time period. I am asking for you to extend the deadline for comments so that more voices can be heard, that is if you truly care what the community wants.

I look forward to hearing back from you on these comments so that I can share with my family and friends.

Regards,  
Joe Danko

[REDACTED]  
[REDACTED]  
Sent from my iPad

0019-1

Thank you for your comment.

**From:** Douglas Deaville [REDACTED]  
**Date:** January 14, 2014 6:03:09 PM EST  
**To:** [Gregory.Preston@Navy.mil](mailto:Gregory.Preston@Navy.mil)  
**Subject:** NAS JRB Willow Grove

An 8000 foot runway that accepts heavy aircraft is a National Resource that should not be squandered for more urban sprawl.

Option 3 is the best; commercial and general aviation can commence in shorter time and generate revenue than either option 1 or 2, and with the least impact on the community and the environment.

Business appreciates ready access to air transportation. Corporate aviation is a contributor to local economy, and it is a long limo ride from Philadelphia International.

D.J. Deaville  
[REDACTED]

0019-1

0020-1

Thank you for your comment.

From: [REDACTED]  
Sent: Sunday, February 09, 2014 16:10  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Willow Grove Naval Air Station

Dear Mr. Preston,

Please consider the future needs of our economy and transportation infrastructure when making decisions regarding the use and development of Willow Grove Naval Air Station. I cannot believe there would not be serious regret twenty or more years down the road if the development of the Air Station does not include a civilian airport, which will be necessary for our future transportation needs. We need to think ahead, beyond the immediate future and needs, unlike much of the highway planning that finds us with out of date highways by the time they are completed. Please give this matter serious consideration as once that runway is gone, it will be gone forever.

As a resident of Norristown Road in Horsham Township for over 30 years, I have never felt that the air traffic generated from the Air Base was a detriment in any way; the only time the noise was more than minimal was during the once yearly air show and there have no air traffic accidents that I can recall. I have not found the presence of the Air Station and traffic to affect real estate values or the desirability of Horsham as a place to live as the township is consistently voted as one of the best places to live in the USA.

Sincerely,

Carole Dietterich

0020-1

0021-1

Thank you for your comment.

From: Steve Ferguson [REDACTED]  
Sent: Monday, February 10, 2014 19:31  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: NAS JRB Willow Grove

Mr. Preston,

Ever since the day I heard the base was closing it only made sense that it would become a Civilian Airport to me. I grew up and currently live 1.9 miles from the approach end of the 33 runway. As a child I loved the always changing air traffic that passed right over my house. I have had Blue Angels, Thunderbirds, C130s, PC3s, A10s, hundreds of other aircraft right over my back yard. I owe my lifelong love of flying and airplanes to the Willow Grove NAS. I am currently a private pilot living in Hatboro and paying \$400 a month in rent to have my plane sit in a hanger in Doylestown. Even though Doylestown is only 9 miles away, on most days with traffic it can take over 45 minutes to get there. I would relocate my plane to Willow Grove in a split second given the chance. If they offered hangers for sale I would be at the front of the line to buy one. The U.S. Navy has offered the township of Horsham a gift worth tens of millions of dollars in infrastructure and all they have to do is take it. The cost to duplicate the runway, the taxiways, the fuel farm, the hangers, the security perimeter, and control tower are so high that it will never happen again in America. No one buys land and puts up a new airport of that caliber except major cities. But the scare tactics of the "No airport" people were just too much for common sense to overcome. They plastered the roads with signs telling everyone that if the base were a made into a civilian airport there would be planes falling out of the skies and landing on little children daily. I'll have you know that in the 70+ year history of the base there were only 4 crashes without a single civilian casualty. That is less than the number of serious cars accidents in Horsham in a week. I also take great offense to the "No Airport" people's claim that civilian pilots are such a great threat to everyone else in the world. I have been a pilot for over 25 years without a single incident resulting in bent aluminum or harm to anyone. Every time I think of the base being turned into more houses and shopping malls I get sad. I distinctly remember the slogan from the anti-airport website that read "We have a chance to do something truly special with this land" meaning of course houses and stores. Here is a little math lesson for you. How many stores are there in the USA? Just slightly less than 2 million according to the 2010 census. How many houses in the USA? Around 125 Million. How many Airports in the USA? There are about 5000 airports with paved runways in the USA. Well look at that? It seems what is truly special is an airport. It crushes my soul to watch Horsham wasting what could be such a boost to the local economy and infrastructure of this area for the next 50 years so that a couple fat cat developers can make more money off our backs. But like anything else, money talks and the developers always win.

So after they make their millions in profits what do these developers truly offer Horsham? More houses we don't need, more stores that we already have, and much more crushing traffic added to an already strained system. I feel very special now.

Best regards,

Stephen Ferguson

FAA Licensed Privet Pilot

0021-1

0022-1

Thank you for your comment.

From: Linda Goodwin [REDACTED]  
Sent: Saturday, January 18, 2014 11:01  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Willow Grove Air Base

Dear Gregory,

I read in the Hatboro-Horsham Patch that you were taking comments about the reuse plan for the former Willow Grove Air Base.

I am very disappointed in the direction Horsham Township wants to move toward for the land. I, as well as many others, are supporters of keeping the air strip active. I was very glad several years ago when the former PA Governor Rendell wanted to keep the air strip and use it for the state guard. I feel that this is land that can not be replaced. I have lived all of my life within 5 miles of the airbase and fully support the function that it has had in the past. I was extremely upset when the BRAC announced it's closing. I have always felt more secure with the airbase here and the location is perfect for so many locations including Philadelphia, New York, Washington DC, and the coast. We are just a short flight away from any of these major areas. I feel that Horsham Township always feels "entitled" to things including this land. Many residents feel like they can not voice their support of keeping the air strip because they are in the minority and no one in the township politics is open minded to anything other than developing the land. Using the land and air strip as a state guard would be wonderful. Also, the plans for it to be used as other airports, including private or small such as Wings Field are good ideas. I would not like to see it become a major airline hub but rather for deliveries and other uses that have been discussed in the past. As I said, the residents that support keeping it as an airstrip feel pushed out and that the fight to keep it is not winnable. As I said above, it is a really large piece of land that can not be easily replaced and I feel that more consideration must be done by the BRAC to keep the airstrip in tact. My entire family, which there are approximately 25 of us that have lived within 5 miles of the air base all of our lives, agree with this opinion.

Thank you for taking the time to read my opinion.

Linda Goodwin

0022-1



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I AM CURIOUS TO KNOW THE PROGRESS OF THE ENVIRONMENTAL CLEAN UP EFFORTS. ARE THEY ON SCHEDULE & BUDGET?

THE CURRENT PLANS DO NOT CALL FOR RESIDENTIAL USE OF CLEAN UP SITES, BUT PLANS CAN CHANGE. ASSURANCE NEEDS TO BE MADE THAT HOMES WILL NOT BE BUILT ON THESE SITES

0023-1

0023-1

Table 3.5-6 of the EIS provides a basic status of the IRP sites at the former installation property. The paragraph preceding this table notes that for detailed information regarding the individual sites, refer to the information repository available at the Horsham Township Library or <http://www.horshamlibrary.org/WillowGroveNASindex.html>.

For more details and the current status regarding the cleanup activities as part of the environmental restoration process, it would be advisable to attend Restoration Advisory Board (RAB) meetings.

Any new information obtained following the EIS would be included in the FOST or as part of the deed transfer.

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name KEITH GRIMES

2. Address 421 JEFFERSON AVE, HATGOW PA 19040

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

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## YOUR INPUT MATTERS

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 :  
 U.S. NAVY :  
 FOR THE DRAFT ENVIRONMENTAL :  
 IMPACT STATEMENT FOR THE :  
 DISPOSAL & REUSE OF THE :  
 FORMER WILLOW GROVE PROPERTY:  
 :  
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- - -  
 Monday, January 13, 2014  
 - - -

PUBLIC MEETING was taken at the  
 1025 Horsham Road, Horsham, Pennsylvania 19044,  
 before Serena A. Spotts, a Notary Public of the  
 Commonwealth of Pennsylvania, on the above date,  
 commencing at 5 p.m.

STREHLOW & ASSOCIATES  
 COURT REPORTERS - VIDEOGRAPHERS  
 258 SOUTH STATE STREET  
 REAR BUILDING, FIRST FLOOR  
 NEWTOWN, PENNSYLVANIA 18940  
 WWW.STREHLOWCOURTREPORTING.COM  
 (215) 504-4622 FAX (215) 504-7155

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COMMENTS/CONCERNS

- - - - -

ATTENDEE: My name is  
M.D. Hamilton, H-A-M-I-L-T-O-N, and I have  
a concern regarding the deer herd that is  
currently on the base property. And I'm  
wondering what's going to happen to the  
deer herd.

Are they going to be relocated?  
Are they going to be allowed to wander into  
the community once the fence comes down  
surrounding the property? Or none of the  
above?

It's my understanding from  
Mr. Shay, who I just spoke with, that the  
deer problem or the deer population is  
something that will pass along to the  
Township at the conclusion of the base  
being turned over to the Township.

If that is the case, I'm aware  
that a tremendous expense is associated  
with transferring a deer, let alone a  
number of deer, by the Pennsylvania Gaming

0024-1

0024-1  
Following the transfer of the property, it is assumed that the fence would be removed during progressive redevelopment. Once the fence is removed, it is assumed that the deer population on the former installation property would disperse into the region. As stated in Section 3.12.2.2, white-tailed deer currently gain access to the property by either jumping over or crawling beneath the perimeter fence. They likely can exit the property in a similar fashion. Therefore, some mixing of deer found on the property with the regional population likely already occurs. For more information on wildlife, refer to Section 3.12.2 and 4.12 of the EIS.



1 Commission.

2                   So I think that Mr. McGee [ph]  
3 and his folks should be made aware of the  
4 fact that, if this deer thing is not  
5 handled before the fact, that he's going to  
6 have to handle it after the fact and absorb  
7 the associated costs with the deer  
8 relocation or removal.

9                   And I thank you very much.

10                   - - - - -

11                   ATTENDEE: I'm  
12 Charles Reinhardt, R-E-I-N-H-A-R-D-T. On  
13 the three plans over here that have a  
14 school -- or two plans that have a school  
15 on the property, wouldn't it be cheaper to  
16 have a campus incorporated in the school,  
17 over where the high school is, so all the  
18 schools are together, like a campus?

19                   It would be a lot cheaper. I  
20 think there is a enough ground over there.  
21 Maybe somebody should look into that. It  
22 would save a lot of money, and I think the  
23 schools would look better as a campus than  
24 spread around all over the county. Just a



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0025-1

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Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

The residents of Horsham have made it quite clear - The runway should not be preserved. The original plan should be used.

0025-1

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name ELAINE HOIST

2. Address 207 GIRARD Ave., HORSHAM, PA 19044

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

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Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

I LIVE IN HORSHAM & DO NOT  
WANT THE AIR FIELD USED FOR  
AIRCRAFT USE  
I WANT THE HORSHAM TOWNSHIP TO  
~~USE~~ USE THE GRAVING FOR TOWNSHIP  
USE ONLY.

0026-1

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name HEIS
2. Address PO BOX 324 HORSHAM, PA 19044-0324
3. E-mail \_\_\_\_\_
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

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4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303

[www.willowgroveeis.com](http://www.willowgroveeis.com)

### YOUR INPUT MATTERS

EDWARD J. HOMOLA  
ISO 341 SOUTH COLUMBIA STREET  
WOODBURY, NEW JERSEY 08096-1912

DIRECTOR, BRAC PROGRAM MANAGEMENT OFFICE EAST  
ATTN; WILLOW GROVE EIS  
4911 SOUTH BROAD STREET, BUILDING 679  
PHILADELPHIA, PA 19112-1303

TO WHOM IT MAY CONCERN,

I DON'T KNOW WHAT THE EXACT  
PARTICULARS OF YOUR DISCUSSION ARE. UNFORTUNATELY I WILL BE  
UNABLE TO ATTEND ON SUCH SHORT NOTICE. I AM CONCERNED  
ABOUT THE WORDING IN YOUR DOCUMENT WHICH I HAVE READ IN  
THE PHILADELPHIA INQUIRER. THIS BASE SHOULD NOT AND WILL  
NOT BE CLOSED DUE TO TO SEVAERAL REASONS WHICH ARE NOT  
OPEN FOR A DISCUSSION ON A OPEN PARAMETER.

THANK YOU;

EDWARD J. HOMOLA

0027-1

Thank you for your comment. As discussed in Section 1.1, Background, in 2005, the BRAC Commission recommended closure of NAS JRB Willow Grove, and the recommendation was approved by President Bush and accepted by Congress on November 9, 2005. By law, all BRAC actions relating to the operational closure of NAS JRB Willow Grove had to be complete by September 15, 2011. The installation ceased operations and was officially closed on September 15, 2011.

0027-1



# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of  
Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

0028-1  
Thank you for your comment.

You are invited to comment on the Draft EIS. To be most helpful, comments should be clearly written and describe specific issues or topics. 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 meeting, (2) speak your comments to the court reporter before leaving the meeting, (3) mail your comments (see address below), (4) e-mail your comments to gregory.preston@navy.mil, or (5) fax comments to (215) 897-4902.

Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

ALTERNATIVE 1 HAS MY VOTE

| 0028-1

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name Anderson Johnson

2. Address 951 Davis Grove Rd

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 MEETING or mail to:

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4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303

[www.willowgroveeis.com](http://www.willowgroveeis.com)

## YOUR INPUT MATTERS

From: Robin Knowles [REDACTED]  
Sent: Friday, January 17, 2014 4:53  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Yes to Alternative 3

Yes to Alternative 3

General aviation and green space both need support.

Thanks  
Robin Knowles

0029-1  
Thank you for your comment.

0029-1

From: [REDACTED]  
Sent: Thursday, January 16, 2014 11:14  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Public Comment

As a resident and 20 year veteran of the U.S. Army, I feel more consideration should be given to option 3 and keeping the runway viable at the former WGJRB. In an emergency or security situation, the length of the runway to accommodate large aircraft is vital. Once it is demolished, the cost to replace it here or in another area would be exorbitant.

Thank you.

Frank Kosmaceski  
[REDACTED]

0030-1

Thank you for your comment.

0030-1

0031-1

Thank you for your comment.

From: Kruse, Carl [REDACTED]  
Sent: Sunday, January 26, 2014 20:01  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: NAS JRB Willow Grove Re-use plan

Greeting sir,

My name is Carl Kruse, currently a senior at Kings College in Wilkes Barre PA, but live in Glenside, PA just 10 miles South west of NAS Jrb Willow Grove. As a young kid I grew up with the planes and helos flying over the house everyday and just fell in love with military aviation. Over the years its become a passion for me and currently am a photographer for Glidepath photography that specializes in working with different military units that would like high quality pictures of their unit free of charge. Willow Grove gave me the opportunity to fall more in love with flying and along with that I met some of the best friends I have just by going over there to watch the planes fly around. Since 1995 we would go over to the base regularly to watch the planes and it just became apart of who we were, and our lives started revolving around the base cause we loved it so much. When we found out the base was to be closing and that the plan was build more houses and to possibly build another road and add in a town center, we just couldn't help but disagree with it. The benefits of having a civil airport is just fantastic. Communities all over the United States would love to have an airport of this size there because of the boost to the local economy, just look at what has taken place with NAS Brunswick becoming a civil airport. This will bring so many jobs to the area, because you have to have people cut the grass, fuel the planes, maintenance of planes as well as around the airport, and of course people to work at the FBO to park the planes. Obviously im just scratching the surface with different job opportunities but it would give people jobs which people are looking for right now. Also you have a brand new runway pretty much that is only a few years old, only being re done in 2004. It is just \$ 55 million alone to rip the runway up, and your not factoring all the taxi ways and all the other buildings around the base. I can guarantee you that when people who live locally find out that their taxes are going to go sky rocketing because of this they wont be happy. You will also have people that own business's or work with business's in the area that own planes ,will see that Willow Grove is now a civil airport and will use Willow Grove as their airport of choice because of how close it is to the city as well as the easy access to major road ways. Its nice and easy to get around and not having to deal with landing at Philadelphia International Airport. Also another way that it would bring money to the community is when people want permanently base their plane there, that is going to cost money, and another way to have an income. Many people think that civil pilots are not that skilled, when actually they have standards to up hold. They must get reevaluated every year and if they do not fly for a 6 month period, they will have to get checked out again in their plane because they are considered not safe for flying. It is a great opportunity for the community to have this airport here and will do so much positives then negatives, i really hope that you look at what i have to say and consider it. Id hate to see it not be used as an airport, when the positives are so strong. Thank you for your time and your service.

V/R,

Carl Kruse

0031-1



Jan. 17, 2014

0032

Dear Sirs:-

I am writing in regards to the  
Airmans Navy Chapel at the Willow  
Grove Air Base.

I was unable to attend the meeting  
on the 13<sup>th</sup> + 14<sup>th</sup> of Jan.

I have been wondering what is  
proposed to be done with it.

My husband, who is deceased, and I  
have attended many events there. He  
retired from the Grove in 1978.

I was active in the Navy Wives Clubs  
of America - Wings 218 aboard the station,  
which is a National Organization, and  
our office installations were held there.  
Our club was aboard the station for  
25+ years.

I was wondering if the Chapel and  
some extra land could be set aside  
for a church to purchase and use if  
the thinking of the planners is for homes.  
It would be a perfect setting for a  
community church. I would also hate  
to see the beautiful stained glass windows  
destroyed. Many were donated in memory  
of loved ones.

Another suggestion would be to turn  
it into a History museum of the Air  
Station. With the Air museum near by  
would be a perfect arrangement.

Thank you for considering my  
suggestions  
Nancy Jeggitt (over)

0032-1

Thank you for your comment. The EIS analyzed the HLRA's preferred  
Redevelopment Plan (Alternative 1) and related redevelopment plans.  
The specific design and build-out of the plans will be determined by the  
HLRA and the developer. Currently, the alternatives do not include a  
community church.

The J. William Ditter Memorial Chapel closed its doors in January of  
2011. The stained glass windows were transferred to Joint Base  
Maguire-Dix-Lakehurst to support their religious program.

0032-1

Nancy Leggett  
973 Birch Rd.  
Warminster, Pa. 18974  
215-441-5945

Nancy Leggett  
973 Birch Rd.  
Warminster, PA 18974-4011

PHILADELPHIA PA 190

17 JAN 2014 PM 5 L



Director, BRAC Program Management Office Eas  
Att: - Willow Grove EIS  
4911 South Broad Street, Bldg. 679  
Philadelphia, Pa. 19112 - 1303  
Brac

19112130311



0033-1  
Thank you for your comment.



### Public Meeting Comment Sheet

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Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

You are invited to comment on the Draft EIS. To be most helpful, comments should be clearly written and describe specific issues or topics. 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 meeting, (2) speak your comments to the court reporter before leaving the meeting, (3) mail your comments (see address below), (4) e-mail your comments to gregory.preston@navy.mil, or (5) fax comments to (215) 897-4902.

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WILLOW GROVE AIRFIELD HAS EXTENSIVE HISTORY. SOME PART  
OF THE FIELD SHOULD BE KEPT AS AIRSTRIP. ONLY 4000 FEET  
OF THE RUNWAY IS NEEDED FOR GA USE AND WOULD  
PROVIDE VALUABLE ACCESS TO THE AREA NOW SERVED  
BY ONE AIRPORT IN DOVER TOWN WITH INADEQUATE  
SPACE FOR TRANSIT AIRCRAFT. A RUNWAY  
CAN BE INCORPORATED INTO OPEN SPACE AND PROVIDE  
A MEANS TO LAND NEAR ALL THE ATTRACTIONS POSSIBLE FOR  
THE LAND (RECREATION PARK, MALL, SHOPS, MUSEUM ETC.)  
I AM STRONGLY IN SUPPORT OF HAVING A RUNWAY  
ON THE WILLOW GROVE LAND. WHEN THE GOVERNMENT  
ACQUIRED THE LAND (THEN AN AIRPORT), THE OWNER  
WOULD HAVE WANTED IT RETURNED TO CIVILIAN USE  
AS AN AIRFIELD.

0033-1

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- 2. Address
- 3. E-mail

- 4. Please check here  if you would NOT like to be on the mailing list
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[www.willowgroveeis.com](http://www.willowgroveeis.com)

**YOUR INPUT MATTERS**

0034-1

Thank you for your comment.

From: McKay, Louis E. Jr. [REDACTED]  
Sent: Wednesday, February 05, 2014 20:22  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Cc: Rep.Mike Fitzpatrick  
Subject: Willow Grove Airbase

Dear Mr. Preston,

This recent storm and the wide spread power problems in the tri county area bring to mind what role the base could play. If it were to remain an airport crews and equipment could be staged and or flown in to respond. Thankfully this is not an event that happens often but if it was to remain a public use airport options would be at hand for local, state and federal response plans. I think the base and its ground could serve the needs of Horsham and more importantly the region as a business hub, housing and commercial development. The footprint as an airport would be similar to Wilmington, without passenger service or heavy fright.

I know that the BRAC process was never intended to take such a myopic view that focused so much on a local township vs. the region, but as a commonwealth townships have great power and that's good. I can understand local displeasure over an airport option, much of that built on false statements. The field is irreplaceable in the Northeast corridor and in years to come will be sorely missed as a transportation option for business and national & local security option. I have lived long enough to learn the right answer is a hard one, but working to the middle gets things done and both parties find the result to be better than expected. A joint use business park with some road issues resolved for the township and business and employment tax is a good alternative to handing over a taxpayer funded base to a private developer, who may be saying it has little value as is. I would think a bi county or regional authority could manage an airport and make the numbers work, this authority would be none compensated positions with a mix of aviation, business, military backgrounds to Sheppard it back to life as regional asset.

I will end with a quote from a Navy Veteran,

We do these things not because they are easy, but because they are hard. JFK

Thanks for your hard work,

Lou McKay  
[REDACTED]

0034-1

[REDACTED]

[REDACTED]

0035-1

Thank you for your comment.

From: Frank McKee [REDACTED]  
Sent: Friday, January 17, 2014 8:47  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: willow grove

Greg, I am an ATP rated pilot who flies a TBM 850 out of Brandywine airport in West Chester, Pa. I am strongly in favor of seeing Willow Grove become a public use airport. This would be a boon to the economy in Bucks County and provide a much needed alternative to the smaller fields surrounding Philadelphia. Thank you, Frank J. McKee

0035-1



# Public Meeting Comment Sheet

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① I am concerned about traffic - How will this issue be addressed? - Will new lanes be built on 611, for example?

② How much will we be impacted by the drone command center?

③ How will water, sewer, trash be handled so local homes and businesses are not adversely impacted?

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

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## YOUR INPUT MATTERS

0036-1

The EIS analyzed potential traffic associated with the three redevelopment alternatives and incorporated various proposed mitigation measures that would assist in reducing some of the anticipated congestion. Additional through lanes on some roads were proposed. Please see Section 4.4 for additional details on the proposed mitigation measures analyzed as part of the EIS.

Reuse of the former installation property will ultimately be determined by the HLRA and the developer. It would be necessary for the HLRA and developer to further analyze traffic impacts and work with PennDOT and other local municipalities in order to determine when and where specific mitigation measures should be implemented.

0036-1

0036-2

Thank you for your comment. The Ground Command Center at the Horsham Air Guard Station is outside the scope of the EIS.

0036-2

0036-3

Please refer to Sections 3.8 and 4.8, Infrastructure and Utilities, respectively, for more details on water and sewer (wastewater) impacts associated with the three redevelopment alternatives. These future services would be provided by Horsham Township and would be consistent with current services offered in the community.

0036-3

0037-1  
Thank you for your comment.

From: John Mininger [REDACTED]  
Sent: Wednesday, February 05, 2014 11:53  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Willow Grove Navel Air Station

Dear Mr. Preston,

Until now, I never worried much about the economic competitiveness of the United States. I thought that we would always persevere with our creativity, productivity, and sheer "out of the box" thinking. Lately I've been worried. How can this country remain competitive if we're relegated to an increasingly overcrowded transportation infrastructure? Does anyone really believe if the Willow Grove Air Station land is developed and does not include a civilian airport, that we won't regret that decision 20-30-50 years down the road? Once that runway is gone, it will be gone forever.

We need to take the long term view and include a civilian airport in the redevelopment plans for Willow Grove Navel Air Station. If we allow that facility to be denied civilian use, we will not only loose a huge potential piece of transportation infrastructure for theentire Southeastern Pennsylvania region, we will literally be squandering the mobility of future generations.

John Mininger

[REDACTED]

[REDACTED]

[REDACTED]

0037-1



0038-1

Thank you for your comment.

From: Marianne Mosher [REDACTED]  
Sent: Monday, February 10, 2014 13:04  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Public comment on the NAS JRB Willow Grove EIS  
Importance: High

Please accept the following comments regarding the NAS JRB Willow Grove EIS. Our recommendation is Alternative 3: Airfield Reuse.

The single biggest reason for NASWG to remain an airport, in our view point, is that remaining an airport will re-use existing infrastructure, ie the runway, many of the existing hangars and other supporting buildings, while preserving open space. Sure there would be a need to install or upgrade existing utilities and bring buildings up to code, but the up front, immediate costs are about 1/4th of costs of the HLRA's choice alternative. All other factors considered, leaving NASWG as a civilian airport has only a fraction of the impact upon existing natural resources (WATER!), requires far less in terms of electrical and natural gas usage, auto and truck traffic generated, etc. And noise from aircraft? The EIS lays that out too. If you happen to be standing near the intersection of Maple Ave and Easton Road (611), when an aircraft flies over on final approach, you MIGHT have trouble having a conversation, but there is no risk to your hearing. That's the only place outside the airfield perimeter where the noise might rise to a nuisance level. Interesting to note, alternative #2, more new houses than Alternative #1) would require a new middle school to be built, and the EIS indicates that wastewater management may be extremely difficult to EVER deal with, if not impossible. Every statement above reflects, and is supported by data from the EIS Draft provided by the Navy.

While we are not residents of Horsham, we both were drilling reservists stationed at NAS JRB Willow Grove for 20 years and we do not want to see this airfield destroyed.

Marianne E. Mosher  
Duane E. Mosher

[REDACTED]  
[REDACTED]

[REDACTED]

0038-1



# Public Meeting Comment Sheet

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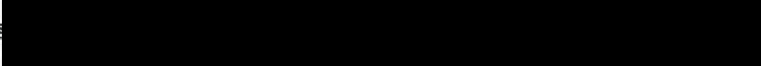
The various plans for development have attractive features. Hopefully, community opinion will be given true consideration. My concerns, as well as others who could not attend, are reflected in the following:

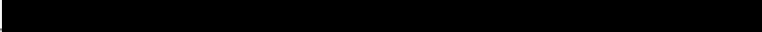
Re-development is welcome and overdue. I look forward to the economic and human advantages and aspects brought in by developers. However, concerns have arisen over the proximity of the Drone Command Center to parks, retail outlets, museums and other adjacent forms of community activity. The Drone Command Center at the Horsham Air Guard station is an integral part of the continuing war on terror. We need public hearings to discuss the safety of having community activity in walking distance from what is part of the war zone.

0039-1

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## YOUR INPUT MATTERS

-----  
 :  
 U.S. NAVY :  
 FOR THE DRAFT ENVIRONMENTAL :  
 IMPACT STATEMENT FOR THE :  
 DISPOSAL & REUSE OF THE :  
 FORMER WILLOW GROVE PROPERTY:  
 :  
 -----

- - -  
 Monday, January 13, 2014  
 - - -

PUBLIC MEETING was taken at the  
 1025 Horsham Road, Horsham, Pennsylvania 19044,  
 before Serena A. Spotts, a Notary Public of the  
 Commonwealth of Pennsylvania, on the above date,  
 commencing at 5 p.m.

STREHLOW & ASSOCIATES  
 COURT REPORTERS - VIDEOGRAPHERS  
 258 SOUTH STATE STREET  
 REAR BUILDING, FIRST FLOOR  
 NEWTOWN, PENNSYLVANIA 18940  
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 (215) 504-4622 FAX (215) 504-7155

1 and woman surveilling people overseas,  
2 targeting them and killing them from a  
3 location up the road from me is disturbing  
4 at best.

5 We are not at war with the  
6 countries in question that will have said  
7 drones operating from Horsham, surveilling  
8 them, and/or killing their citizens. This  
9 includes Yemen, Afghanistan, and Pakistan.

10 Although redevelopment in town  
11 is welcome, I object to the Horsham Air  
12 Guards Station being committed to piloting  
13 weaponized drones overseas. The DOD is not  
14 a good neighbor with respect to no public  
15 hearing on this piece of the compound.

16 And I would like this paper  
17 (indicating) to be included in the record  
18 also.

19 - - - - -

20 ATTENDEE: This is ,

21 I work with the Brandywine  
22 Peace Community, and a concern came up. A  
23 concern has arisen that, although there is  
24 a lot of folks who welcome the

0040-1

Thank you for your comment. The Ground Command Center at the Horsham Air Guard Station is outside the scope of the EIS.

1 redevelopment of the airbase area, there is  
2 some other issues that have arisen.

3 People believe that it's  
4 certainly long overdue, and any kind of  
5 economic relief, more for people to do,  
6 parks, recreation, museums, that's all  
7 good. That's all great. There is a lot of  
8 viable plans that have been offered to the  
9 community.

10 The issue that came up is there  
11 is also, concurrently, the establishment of  
12 a drone command center at the airbase over  
13 here. And what that means is, essentially,  
14 that, from there, they will be flying  
15 drones that are on missions in the Middle  
16 East.

17 As that's a part of the war on  
18 terror -- that's an intricate part of the  
19 war on terror, the things you read in the  
20 news, you know, that civilians are killed  
21 wedding parties were killed, people are  
22 killed, this, as a part of the war on  
23 terror, is essentially -- and I'm not  
24 dramatizing this -- this is essentially

0040-1

0040-1 0040-1 cont'd  
Continued

1 part of the war zone.

2 Give some consideration to:  
3 What is the wisdom of putting a drone  
4 command center in, essentially, the heart  
5 of the community? This would be a thriving  
6 community that's going to benefit from all  
7 the economic and job creations and having  
8 parks and museums and all these wonderful  
9 things to do.

10 What is the wisdom of  
11 establishing this drone command center in  
12 walking distance from all of this human  
13 activity?

14 And where are the public  
15 hearings? Why hasn't there been a public  
16 hearing on the wisdom and the essential  
17 safety of the community of establishing  
18 this drone command center in close  
19 proximity to what would be a thriving area?

20 That's essentially the issue.

21 - - - - -

22 (Whereupon, the public meeting has  
23 concluded.)

24 - - - - -

0040-2  
Thank you for your comment. The Ground Command Center at the  
Horsham Air Guard Station is outside the scope of the EIS. Questions  
regarding public involvement specific to the Ground Command Center  
should be directed to the Horsham Air Guard Station.

0040-2



# Public Meeting Comment Sheet

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JANUARY 13, 2014

- AGAINST AIRFIELD REUSE

- CONCERNED ABOUT RE TAX IMPACT ON CURRENT RESIDENTS

- GOOD FOR US?

- HOW LONG WILL IT TAKE TO BECOME GOOD FOR US?

- BAD FOR US

- RIGHT AWAY?

- LONG TERM

0041-1

0041-2

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www.willowgroveeis.com

## YOUR INPUT MATTERS

**From:** David Pitcairn [REDACTED]  
**Sent:** Monday, February 10, 2014 11:20 PM  
**To:** [REDACTED]  
**Subject:** NASJRB Willow Grove Draft EIS comments

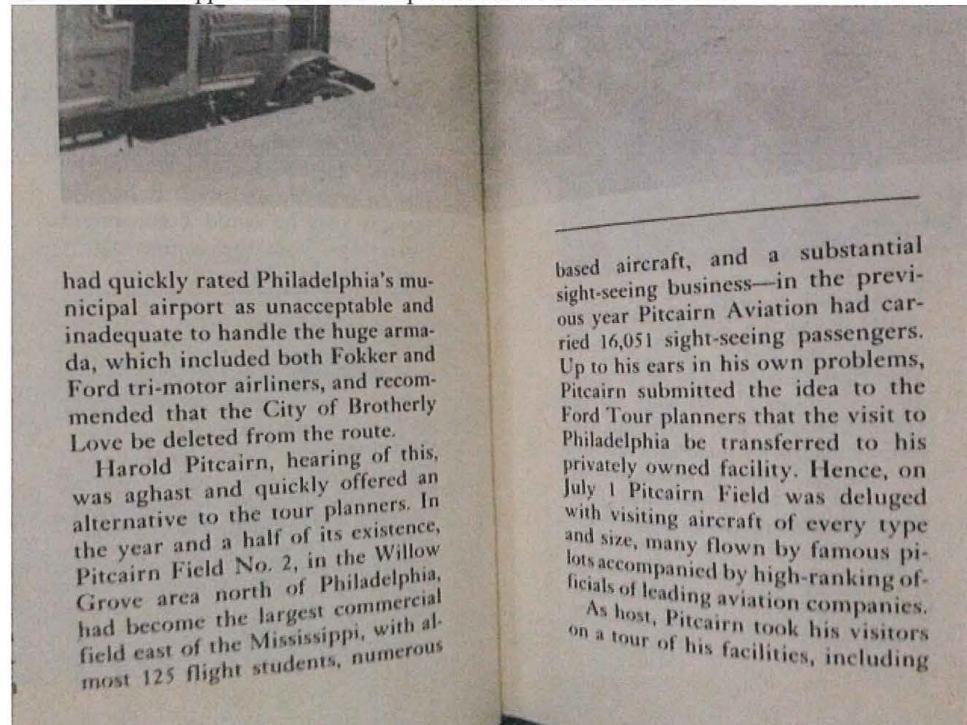
Re: Draft EIS for the Former Navel Air Station Joint Reserve Base Willow Grove

Dear Gregory and Matt,

Here are my comments:

1) Pg. 1-1, Section 1.3

The historical start date of the airfield is not correct. The airfield was in operation in 1926 and according to the Book "Legacy of Wings, the Harold F. Pitcairn story" it was the busiest airport east of the Mississippi. See the attached picture for the text from the book.



Further corroboration is given here <http://www.hhra.org/nas-jrb-willow-grove/history.aspx> and below.

The Aircraft Yearbook for 1926 gives a sense of the newness of the Willow Grove site, "... Harold F. Pitcairn,

0042-1

Thank you for your comment. The text has been revised accordingly.

0042-1



president of Pitcairn Aviation, Inc., is a pilot, and also a director of National Air Transport, Inc. The Pitcairn Field is at Willow Grove, Pa. Here are a factory, hangars and ten airplanes. During the first sixteen months of operation by Pitcairn Aviation, Inc., no passenger has suffered the slightest discomfort. In 1925, Mr. Pitcairn's ships made 5,314 flights, covered 63,000 miles and carried 4,168 passengers."

Source: <http://pitcairnfield.org>

2) Pg. 1-6, section 1.5.1

Please clarify the number of acres going to the Air Force so that it is clear that the 45 acres was added to existing acreage so the Air Force now has XX acres total.

3) Pg. 2-9, Section 2.3.3

There are many examples of fly-in communities where housing is situated adjacent to runways. In addition, town centers create sufficient noise that most people would not hear the airfield. That said, it makes sense that there is just not enough land available to incorporate those uses. Please amend the language in the paragraph accordingly.

4) Pg. 4-19, section 4.2

Please discuss and compare ongoing economic impacts, not just the short term construction jobs impacts. The airport would attract businesses to the area so there are potential economic impacts there also. Also of note, the HLRA's preferred plan, according to the HLRA, will take many years (up to 20) where the airport could be operating very quickly and attract economic development to the area fairly quickly (2-5 years?).

5) Pg. 4-27, section 4.2.1.5, Last paragraph

The EIS makes a comment about Alternative number 1 and 2 providing a tax revenue benefit the community. Since it is commonly known that housing pays less in revenue than is returned in services, the business taxes from the land would be used to offset the housing services so there would be no benefit to the existing community, and possibly a negative benefit. The is corroborated by the HLRA statements that the project is design to be "tax neutral" (I have it on video if you want evidence). Therefor, the only benefit is to the administrators of the town and some new teachers and other professionals who would be hired to provide for the new residents. Both the new residents and the government employees are not likely to come from the existing community. On the other hand, an airport option and the businesses on the property instead of housing would benefit existing taxpayers, not just increase the tax base for the sake of increasing the tax base, and help fund existing services for current residents.

6) Pg. (Various places), Tax Revenues

Please clarify that the tax revenue presented is Annual and ongoing after full buildout for all options since it is not clear as currently written.

7) Environmental impacts

0042-2

Thank you for your comment. The text has been revised to state the number of acres that have been transferred to the Air Force.

0042-3

Thank you for your comment. Language has been added to Section 2.3.3 with respect to residential development within Alternative 3.

0042-4

The socioeconomic impact associated with the three redevelopment alternatives is presented in Section 4.2, including both short-term and long-term job creation. The EIS analyzes the potential impacts of the three redevelopment alternatives at full build-out; however, Section 4.2 notes that certain aspects of the proposed developments may be operational sooner than others.

The DOD has recognized the HLRA as the authority for redevelopment of the former installation property. Therefore, the HLRA will determine the reuse of the property and the order in which the development proceeds.

0042-5

The potential tax impacts associated with the three redevelopment alternatives are presented in Section 4.2. In addition, they are summarized and compared to each other in Tables ES-1 and 2-2.

0042-6

Text has been revised that tax revenues would be annual, ongoing for all alternatives analyzed in the EIS.

Fuel spills due to aircraft are noted, though they would have limited impact due to evaporation since they would occur on Concrete surfaces and likely not make it into the underlying ground. To be fair, a discussion of dripping car oil, gas spills and emissions from lawn equipment, washing cars, Drano dumped down house drains etc. should be discussed as housing and businesses do their part to pollute the ground and waste water systems.

In closing, thank you for creating a non-biased EIS. The results in the Draft EIS are what was needed in order to have a fair discussion about the benefits of an airport vs. more housing during the public process two years ago, when developing the HLRA preferred plan. The biased HLRA made sure that did not happen. The HLRA did not meet the BRAC rules for an unbiased LRA. I respectfully request that a new public comment period be undertaken by an unbiased LRA in order to fairly assess the true desires of the community and region. This would be fairly fast compared to the past process and could consist of potentially two public meetings, to introduce the topic and to vote on the preferred plan, about 2 months or so to put this question of bias vs. fairness to bed. Taxpayers deserve the facts and to make a decision based on the facts.

Thank you.

Sincerely,  
David Pitcairn

0042-7  
Thank you for your comment.

0042-8  
Thank you for your comment. The Redevelopment Plan was prepared through a separate process from the EIS. Reexamining the development proposed by the HLRA is outside the scope of this document.

-----  
 :  
 U.S. NAVY :  
 FOR THE DRAFT ENVIRONMENTAL :  
 IMPACT STATEMENT FOR THE :  
 DISPOSAL & REUSE OF THE :  
 FORMER WILLOW GROVE PROPERTY:  
 :  
 -----

- - -  
 Monday, January 13, 2014  
 - - -

PUBLIC MEETING was taken at the  
 1025 Horsham Road, Horsham, Pennsylvania 19044,  
 before Serena A. Spotts, a Notary Public of the  
 Commonwealth of Pennsylvania, on the above date,  
 commencing at 5 p.m.

STREHLOW & ASSOCIATES  
 COURT REPORTERS - VIDEOGRAPHERS  
 258 SOUTH STATE STREET  
 REAR BUILDING, FIRST FLOOR  
 NEWTOWN, PENNSYLVANIA 18940  
 WWW.STREHLOWCOURTREPORTING.COM  
 (215) 504-4622 FAX (215) 504-7155

1 Commission.

2 So I think that Mr. McGee [ph]  
3 and his folks should be made aware of the  
4 fact that, if this deer thing is not  
5 handled before the fact, that he's going to  
6 have to handle it after the fact and absorb  
7 the associated costs with the deer  
8 relocation or removal.

9 And I thank you very much.

10 - - - - -

11 ATTENDEE: I'm  
12 Charles Reinhardt, R-E-I-N-H-A-R-D-T. On  
13 the three plans over here that have a  
14 school -- or two plans that have a school  
15 on the property, wouldn't it be cheaper to  
16 have a campus incorporated in the school,  
17 over where the high school is, so all the  
18 schools are together, like a campus?

19 It would be a lot cheaper. I  
20 think there is a enough ground over there.  
21 Maybe somebody should look into that. It  
22 would save a lot of money, and I think the  
23 schools would look better as a campus than  
24 spread around all over the county. Just a

0043-1

Thank you for your comment; however, this is outside the scope of this EIS. The DOD has recognized the HLRA as the implementing authority to determine the final design and reuse of the former installation property. Please refer your question regarding designing the school in a campus setting to the HLRA.

0043-1

1 thought.

2 The other thing I had was, these  
3 million dollar homes you're talking about  
4 up there, if the Army brings helicopters  
5 in, you're going to have a helicopter  
6 flying over your house. I don't think  
7 these people are going to like that.

8 That's it.

9 - - - - -

10 ATTENDEE: My name is  
11 Emily Cook, E-M-I-L-Y, C-O-O-K. I'm from  
12 Montgomery County, Pennsylvania. I'm a  
13 resident, voter, and tax payer in  
14 Montgomery County and remain deeply  
15 concerned about the DOD's operation of a  
16 drone command center adjacent to the  
17 property in question, the land for  
18 redevelopment.

19 Am I speaking too fast?

20 Horsham and citizens from the  
21 rest of the state have not been afforded an  
22 opportunity in a public place to question  
23 authorities regarding weaponized drones  
24 being operated overseas, and that the men

0043-2  
Thank you for your comment. Flying helicopters operating at the Horsham Air Guard Station is not a component of this EIS. The EIS analyzed the HLRA's Redevelopment Plan and related alternatives to that plan. The DOD has recognized the HLRA as the implementing authority to determine the final design and reuse of the former installation property.

From: Mark Rossi [REDACTED]  
Date: January 10, 2014 at 2:06:08 PM EST  
To: [REDACTED]  
Subject: air base

0044-1  
Thank you for your comment.

alt1 should only be considered if the traffic pattern this area is already experience  
corporate space in the area is already overbuilt ( vacant) Residential should not be considered.

0044-1

alt 2 not considered

alt 3 should be considered without residential development

best use of land should be open spaces, parks walking ,biking recreation use

NO RESIDENTIAL USE!!!

From: Jim Rotenberger [REDACTED]  
Sent: Monday, February 10, 2014 9:35  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Willow Grove

Good morning,

Today is the last day of public comment and as a GA pilot out of KUKT, I would like to comment on the reuse of Willow Grove. I looked over the possible plans and would say I support option number three or the no action plan of the Navy retaining ownership. I am not sure my comment will sway anyone, would like it added to others in favor of saving a valuable assets in our area of SE Pennsylvania. Thank You, Jim Rotenberger

0045-1

Thank you for your comment.

0045-1

From: Gene Ruzzi [REDACTED]  
Sent: Monday, January 27, 2014 2:40  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Willow Grove Re-use

Hello,

On the subject of the re-use of the former NAS JRB Willow Grove, I am a firm believer that it should be re-used as an airport. I don't believe a fair assessment was made by the Horsham reuse authority, and unfortunately as usual politics played too much of a role and there wasn't a focus on what's best for the area and local people. Those against an airport made more noise than those who supported one. In reality from just talking to many citizens of Horsham, I believe there is just as much if not more support for an airport than against it. Horsham does not need more homes or businesses, especially in today's economy. The space for the most part is going to sit and waste away for many years in my opinion if an airport is not part of the plan for re-use. There are so many possibilities for re-use as an airport that would bring jobs to the area, and support the surrounding businesses that have struggled since the Navy left. The transition to an airport would be much more time and cost effective, as a lot of infrastructure is already in place. Worst of all in my opinion, if the runway is torn up the region will lose a huge asset for good. Thanks for your time and reading my comments.

Sincerely,  
Gene Ruzzi

0046-1  
Thank you for your comment.

0046-1





# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of  
Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

You are invited to comment on the Draft EIS. To be most helpful, comments should be clearly written and describe specific issues or topics. 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 meeting, (2) speak your comments to the court reporter before leaving the meeting, (3) mail your comments (see address below), (4) e-mail your comments to gregory.preston@navy.mil, or (5) fax comments to (215) 897-4902.

Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

① Prefer Option 3 because as Curator of the aviation museum it would provide us the opportunity to bring in new aircraft a lot easier.

② Understanding Option 1 is the preferable one I like the shared parking capability with a recreation center. Please allow sufficient parking for both facilities to host events.

③ Concerned about number of office/retail spaces on plans since in current economy it's tough to fill the ones that we have now.

0047-1

0047-1  
Thank you for your comment.


0047-2

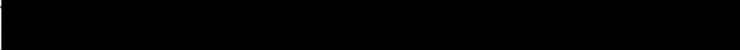
0047-2  
Thank you for your comment. The EIS analyzed the HLRA's preferred Redevelopment Plan (Alternative 1) and related redevelopment plans. The specific design and build-out of the plans will be determined by the HLRA and the developer.

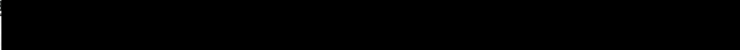
0047-3

0047-3  
Thank you for your comment. A real estate market analysis was conducted by the HLRA during the preparation of the Redevelopment Plan. It is presented in Chapter 7 of the Redevelopment Plan and covers the residential market, office market, industrial market, and retail market. The EIS analyzed the HLRA's Redevelopment Plan and related alternatives to that plan.

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name 

2. Address 

3. E-mail 

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 MEETING or mail to:

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4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303  
www.willowgroveeis.com

## YOUR INPUT MATTERS



# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

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My biggest concern is the cost of redevelopment that may fall to Horsham's responsibility. The costs of road structures for access, sewer & water infrastructure, utilities, runway removal, etc. (1) Aside from private development options, what amount of programs, grants, etc. can Horsham anticipate? (2) How were these costs addressed in the EIS? (3) What amount, in infrastructure investment will be required? (4) Are these costs considered when negotiating transfer prices?

Does Alternative 3 address the effects of residential property values when estimating costs to the Township & Community?

0048-1

Comment: My reaction to the estimate of construction expenditures for Alt 1+2 is that they appear to be very optimistic. I would be shocked that anything would cost could come at \$928-945 million!

0048-2

PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

(over) ->

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

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Please drop this form into one of the comment boxes here at the PUBLIC MEETING or mail to:

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 4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303  
 www.willowgroveeis.com

## YOUR INPUT MATTERS

0048-1  
 The DOD has recognized the HLRA as the implementing authority to redevelop the former installation property.

A qualitative discussion of the impact of noise on residential property values has been added to Section 4.2.3.3 as it relates to the proposed airport in Alternative 3.

0048-2  
 The estimated costs of construction were developed by RKG Associates, Inc. for the HLRA during the redevelopment planning process. The engineering cost assumptions made during this estimation process have been integrated into the development of the alternatives. At present, given the overall conceptual nature of each alternative, these cost estimates are "best guess" estimates of the overall costs of construction.

PLEASE PRINT

Generally, I think the EIS was done very well...  
thorough and easy to digest.  
The Navy employees + contractors were very  
professional + helpful!

Thanks  
MS Mitchell

Please drop this form into one of the comment boxes here at the PUBLIC MEETING or mail to:  
Director, BRAC Program Management Office East, Attn: Willow Grove EIS  
4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303

**YOUR INPUT MATTERS**

From: Judd Smith [REDACTED]  
Sent: Sunday, February 02, 2014 18:02  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: NAS JRB Willow Grove re-use

Good afternoon,

I wanted to give my input on the re-use of the NAS JRB Willow Grove. I definitely think that it should be re-used as an airport. Not only will it create more jobs for the area and help benefit the local economy, but once an airport the scale of Willow Grove is torn up, it is gone forever.

With the Pennsylvania Air National Guard still being based there it could potentially give them another flying mission down the road. Another flying mission for them could potentially be a great benefit to the region as a whole, down the road. If the unit had a flying mission such as C-130 cargo aircraft, they could be a great benefit if a natural disaster hit Pennsylvania and they could be used to fly in supplies. If they were to get a flying mission such as the F-16 or F-35 some day, they could essentially be used in a defense role, if an event like 9/11 happened again.

Also, the Army Stryker unit is based there, in a time of war when they need to get deployed cargo aircraft such as the C-5 or C-17 could utilize the airfield to fly them out. Same goes for any troops still attached to the location.

Too many people in the local area, assume that the airfield being re-used as an airport will ultimately end up like an international airport, such as Philadelphia. Can laws be put into place that forbid such use? Too many people only seem to look negatively at the idea of an airport, simply, because they are uneducated. Another big issue that I personally have is the simple fact that the people who moved to the local area were well aware that an airport was there. So no matter what the airport is, they should be able to accept it.

Does the Willow Grove area need anymore schools? homes? or industrial parks that go unused? No. Do we need more traffic congestion? No. Look at the Naval Air Development Center Warminster, which shut down in the mid-90's just 7 miles from Willow Grove. A huge section of the runway still remains there. Will the same thing happen to Willow Grove? I sure hope not.

As you can tell, I definitely am in 100% support of an airport. I know that if it did turn into an airport I would and many of my friends, would try and get jobs on the location. I know we are only a small number, but I am sure plenty of other people feel the same as I do.

May I ask, what is the current likely plan that will be used? I am just curious if the airport is even a possibility still at this point.

0049-1

Thank you for your comment.

0049-2

The DOD has recognized the HLRA as the implementing authority to redevelop the former installation property. The HLRA's preferred reuse is Alternative 1 of the EIS.

0049-1

0049-2

Thank you for your time.

Respectfully,

Judd Smith



# Public Meeting Comment Sheet

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Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

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Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

my concern - represented in the attached statement - is the question of the impact of the Grove War Command Center on public safety in the very important development of the area in question.

Please respond to the question raised in the attached statement.

0050-1

1. Name

2. Address

3. E-mail

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

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www.willowgroveeis.com

## YOUR INPUT MATTERS

**Statement of Concern:** Environmental Impact Statement (EIS) regarding reuse of the former Willow Grove Naval Air Station.

Many, if not most, residents of Horsham Township and neighboring communities – Hatboro, Ambler, Chalfont, and North Wales - will welcome the long overdue construction and redevelopment of the land, 8% of the township's acreage, resulting from closure of the Willow Grove Naval Air Station. The human and business potential of the implementation of plans by the Horsham Land Redevelopment Agency (HLRA) will be realized over generations. The building of nature and conservation parks, retail businesses, a town center, an aviation museum and other proposed projects will create long term employment in a time of sluggish economic recovery. Shifting tax burdens, creation of capital, dependable and growing work opportunities can only increase Horsham's high profile rating as one of the most desirable places to live in America.

However, in the midst of anticipation for whatever plan or alternative template for redevelopment is approved, there is another issue that has not been part of these considerations and that is the current establishment, without public hearing, of the UAV [Unmanned Aerial Vehicle] / Reaper Drone Command Center at the Horsham Air Guard Station

The Horsham Air Guard Station is directly adjacent to the acreage under re-development consideration.

The drone command center will computer "pilot" remote-controlled drone strike missions thousands of miles from the Horsham Air Guard Station. That, however, won't remove the area within question, nor surrounding areas, from the potential risks and dangers of having a neighboring drone war command center in walking distance from proposed construction.

Drone command personnel in Horsham will direct armed airborne drones and execute drone missile strikes on people around the world. Reports documenting civilian casualties in Pakistan, Yemen, Somalia, and other countries, have created animosity and resentment towards the United States. In fact, the drone command center will operate as an integral part of the "war on terror" and it is therefore a viable target as such.

Redevelopment is long overdue and welcome but do we want a thriving community where families can live, work, and play, in proximity to a silent, computerized drone war zone and potential target?

The ethical and legal issue of drone warfare and remote-controlled killing has become an ongoing debate around the world. The issue of public safety is no less real, here in Horsham Township and surrounding areas, requiring public hearing, consideration, and debate in the face of the dangers posed by the establishment of the drone command center at the Horsham Air Guard.

Brandywine Peace Community, 610-544-1818, e-mail: [brandywine@juno.com](mailto:brandywine@juno.com)  
BuxMont Coalition for Peace Action, e-mail: [cfpabuxmont1@aol.com](mailto:cfpabuxmont1@aol.com)

(Representing a host of area community groups concerned about the establishment of the Drone War Command Center at the Horsham Air Guard Station.)

0051-1  
Thank you for your comment.

From: Bill [REDACTED]  
Sent: Monday, February 10, 2014 17:52  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Willow Grove EIS

Mr. Preston:

As an Accredited Airport Executive I am in favor of the reuse of Willow Grove NAS as a general aviation airport.

This airfield would serve as an excellent reliever for PHL. With roads such as 611 and the PA Turnpike nearby there is excellent ground transportation.

Noise abatement procedures would have less of a noise impact on surrounding communities than military aircraft.

William Smith

[REDACTED]  
[REDACTED]  
[REDACTED]

please include me in notifications

0051-1



0052-1

Thank you for your comment.

From: Timothy Tate [REDACTED]  
Sent: Monday, January 27, 2014 16:46  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Willow Grove EIS

Good Afternoon,

I would like to express my support of EIS Alternative 3 (Airfield Use) of the former Willow Grove Air Station. As a pilot and aircraft owner who travels to Philadelphia several times per year, access to airports in the Philadelphia region is very limited. Philadelphia International is overrun by the airlines which leaves Northeast Philadelphia (KPNE) as the only real serious corporate aircraft facility. Having an additional GA airport for the Philadelphia region would be a tremendous asset, losing it forever to development would be a great loss. I hope that those who make the final decision do so from a logical and not an emotional perspective. A compromise position allowing aviation and non-aviation uses provides the best alternative to all who are impacted.

0052-1

Thank you for the opportunity to provide my views.

Tim Tate

Timothy R. Tate, PE

President and CEO, Stewart and Tate Construction

President and CEO, Riley Welding and Fabricating, LLC

CEO, Lewis Contractors

950 Smile Way, York, PA 17404

[REDACTED]

[REDACTED]

[www.stewartandtate.com](http://www.stewartandtate.com) <<http://www.stewartandtate.com/>>

S-T Sig Logo <<http://www.stewartandtate.com/>>

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# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of  
Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

0053-1

Thank you for your comment.

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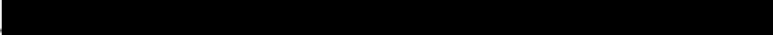
| 0053-1

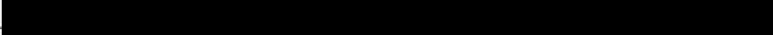
Generally, I am VERY PLEASED with Plan #1!  
Thanks for being so OPEN and WELL  
PREPARED.

GREAT JOB!



PLEASE PRINT \* ADDITIONAL ROOM IS PROVIDED ON BACK

1. Name 

2. Address 

3. E-mail \_\_\_\_\_

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 MEETING or mail to:

Director, BRAC Program Management Office East, Attn: Willow Grove EIS

4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303

[www.willowgroveeis.com](http://www.willowgroveeis.com)

## YOUR INPUT MATTERS

0054-1  
Thank you for your comment.

From: [REDACTED]  
Sent: Wednesday, January 15, 2014 19:05  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Willow Grove EIS

Just wanted to voice my opinion that I support the 3rd alternative, which is to maintain the former airfield as an airport. I believe that option will be the best alternative for the reuse of the former base.

Sincerely,

Glenn Tandler  
Vice President, Philadelphia Little Flyers GTees LLC

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

0054-1

From: Ret Turner [REDACTED]  
Sent: Sunday, February 09, 2014 16:17  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: comment on Willow Grove draft EIS about wildlife impact

Director, BRAC Program Management Office East  
4911 South Broad St., Building 679  
Phila. PA 19112-1303

RE: comment on draft EIS for closed Willow Grove Navy Base.

This comment is about the impact on local box turtles (terrepe carolina carolina) (PA listed species of special concern.) During 2012-2013 I have observed a box turtle population in Strawbridge Park which abuts the northeast boundary of the closed Navy Base. There is no mention of this box turtle population in the PA Fish and Boat Commission letter contained in the draft EIS. It is quite possible that the Commission has no knowledge of this turtle population.

Possibility for beneficial impact: If the Strawbridge Park woods were reconnected to adjacent grounds that include wetlands in the closed Navy Base, it would greatly increase the probability of the survival of this box turtle population. With box turtles rapidly disappearing in Horsham and the region, preserving this part of the local natural heritage would be an invaluable beneficial impact to society.

I would be glad to share my voucher photos and observation data on the turtles. And look forward to hearing from you on this matter.

Thank you for your attention to my concern.

Ret Turner  
[REDACTED]  
[REDACTED]  
[REDACTED]

0055-1

Thank you for your comment. The PFBC response letter did not indicate the specific species of concern. Through a follow-up call, the PFBC indicated that they were not required to divulge what particular species of concern occurred in the area. However, they indicated that it was not likely the box turtle. The letter received by the Navy indicated that no adverse impacts were expected from the proposed project. According to the Pennsylvania Natural Heritage Program website, the only status codes listed for the PFBC are "Pennsylvania Endangered," "Pennsylvania Threatened," and "Pennsylvania Candidate."

The PFBC was offered an opportunity to review the Draft EIS. In a response letter dated January 27, 2014, the PFBC stated that they had no further comment on the EIS.

0055-1

From: Ret Turner [REDACTED]  
 Sent: Sunday, February 09, 2014 1:47  
 To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
 Subject: comment on Draft EIS former Willow Grove Navy base

This comment is provided as both email text and attachment.

February 5, 2014

Director, BRAC Program Management Office East

4911 South Broad Street, Phila., PA 19112-1303

Re: draft Environmental Impact Statement for former Willow Grove NAS

This comment addresses the plan to run a road from the former base onto Keith Valley Road on the north side of the base. My concern is that since Keith Valley Rd. lies in the floodplain of Park Creek, there are safety and environmental problems with this plan.

The safety aspect: Keith Valley Road floods periodically causing a risk of life to motorists who drive, intentionally or inadvertently, into the flood waters. Police resources are expended during flood events to close and patrol the access points. Adding another access point onto Keith Valley from the base would divert more police resources to this effort in times of flood emergency, when these resources would be better reserved for unforeseen emergencies, rather than on a foreseeable threat to human safety, health and welfare.

Environmental implications: Putting an traffic artery from the closed base onto Keith Valley Rd. would necessitate major upgrading to Keith Valley Rd., which is in the floodplain and runs through wetlands. Presently Keith Valley Rd. is relatively thin, having no formal shoulder-it just drops off into oft-water-filled ditches and weeds. To upgrade the roadbed, including adding a shoulder, would involve major environmental impact during construction, and permanent degradation to the ecological integrity of the wetlands and floodplains through which the road passes. It would impair the floodplain's and wetlands' natural beneficial functions of downstream flood protection and ecology preservation.

0056-1

Floodplains at and around the former installation property are discussed in Section 3.11.4 and by alternative in Sections 4.11.1.4, 4.11.2.4, and 4.11.3.4. The text of Sections 4.11.1.4, 4.11.2.4, and 4.11.3.4 has been updated to discuss the location of the terminus of the proposed road at Keith Valley Road within the floodplain associated with Park Creek. Additionally, a new discussion has been added regarding the obligation of the HLRA and developer to adhere to the requirements outlined in Article XXX of the Horsham Township Zoning Code: Floodplain Conservation District, as part of the site approval process. With proper engineering and adherence to appropriate design and construction criteria, safe road placement within a floodplain is permissible.

0056-2

The EIS evaluated the preferred land use plan as presented in the HLRA's Redevelopment Plan (Alternative 1), and two variations/alternatives of that plan: Alternative 2, which included an access road on Keith Valley Road, and Alternative 3, which did not include an access road on Keith Valley Road.

The HLRA's Redevelopment Plan states that "The report concludes with the final preferred land use plan, which captures the general land vision for the property." Therefore, the specific locations of buildings and other infrastructure, such as roads, can theoretically be shifted within the property to avoid or minimize potential impacts, while preserving the land vision for the property in terms of the mix of land uses and level of development.

0056-1

0056-2

0056-3

Thank you for your comment. Upgrading the road related specifically to existing safety concerns and the potential environmental impacts associated with a project of that nature is outside the scope of this EIS. The developer will be required to comply with the site plan approval process and may have to undertake additional studies or implement mitigation.

0056-3

A second major environmental impact of this plan would be the need for two new bridges on Keith Valley Rd.-one over Park Creek and the smaller one just before the Davis Grove Rd. intersection. The present bridges would be inadequate for the traffic projected by the plan. Their construction would cause major environmental impact initially, and likely permanent impact with elevating roadbed approaches to the bridges above flood levels.

Given these problems, and since the planners are creating a road grid for the closed base from scratch, it makes sense to ask the planners for an alternative development plan that doesn't include a road out to Keith Valley Rd.

Many thanks for your attention to my concerns.

Ret Turner  
[REDACTED]

0056-4

0056-4

Thank you for your comment. Potential roadway improvements in areas surrounding the former installation that may be identified at a later date would be evaluated by the local municipalities, applicable agencies, the HLRA, and the developer. The developer will be required to comply with the site plan approval process and may have to undertake additional studies or implement mitigation.



# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of  
Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

0057-1

Thank you for your comment.

You are invited to comment on the Draft EIS. To be most helpful, comments should be clearly written and describe specific issues or topics. 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 meeting, (2) speak your comments to the court reporter before leaving the meeting, (3) mail your comments (see address below), (4) e-mail your comments to gregory.preston@navy.mil, or (5) fax comments to (215) 897-4902.

Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

Reviewed Plans Like Altern 1  
Good Plan

Do Not like Alternative 3

Thank you

0057-1

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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 MEETING or mail to:

Director, BRAC Program Management Office East, Attn: Willow Grove EIS  
4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303  
www.willowgroveeis.com

## YOUR INPUT MATTERS



0058-1

Thank you for your comment.

From: Christopher Uhland [REDACTED]  
Sent: Thursday, February 06, 2014 19:08  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: SAVE WILLOW GROVE NAS!!!

Mr. Preston,

I am e-mailing you in regards to the dilemma the county of Horsham is facing with the re-use of the old Naval Air Station Willow Grove. I wanted to make known that I am fully invested in reusing the military installation as an alternate airfield for general aviation aircraft. I think the airport was and still is a vital asset to the community!!! The loss of the Naval Air Station caused many to lose their jobs and continues to hurt business within the local area. The economy has taken a hard hit over the last few years, and the closure of the installation has added to the decrease of finances the local community has undergone. With the continued presence of the 111th FW, I believe the field could also bring another flying mission to the unit. The idea of building more businesses, homes, or other establishments within the community is too much! The area is already seeing too much construction, new buildings/homes being built, more street lights, traffic, etc., and to have this increase, I am fully against! The likelihood of more accidents and deaths/injuries caused by accidents would only increase. In all honesty, I would feel a lot more unsafe with the increased traffic around the area than I would from any airplane flying overhead. I've lived in the area of Willow Grove NAS for almost 30 years now and have never once felt unsafe about any aircraft flying within the vicinity of my home. Also, the amount of income an airport could provide, as well as the amount of jobs that could increase because of the installation being reused as a general aviation airport could really boost the economy in a positive fashion, and I believe that is what a lot of people around this area are looking for in this day and age. Finally, I feel as though the re-use of the base for any other purpose would create a problem financially. The amount of money it would take to not only construct a new facility over top of the existing installation, but to also clean the remnants of waste, fuel, and other debris left behind by the old Naval base would cost too much! Taxes and other finances paid by the local community would only increase if this were to be done.

I thank you for taking my e-mail into consideration, and even though I am unsure on how the rest of the community of Horsham feels about this situation, I hope that in the end the right decision to keep the base as a GA facility will be made!

Sincerely,

Christopher M. Uhland

0058-1



# Public Meeting Comment Sheet

Environmental Impact Statement (EIS) for the Disposal and Reuse of Former Naval Air Station Joint Reserve Base Willow Grove, Pennsylvania

You are invited to comment on the Draft EIS. To be most helpful, comments should be clearly written and describe specific issues or topics. 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 meeting, (2) speak your comments to the court reporter before leaving the meeting, (3) mail your comments (see address below), (4) e-mail your comments to gregory.preston@navy.mil, or (5) fax comments to (215) 897-4902.

Comments must be postmarked, e-mailed, or faxed by midnight February 10, 2014.

My concern is the potential runoff water onto Keith Valley which goes into Park Creek. This water then crosses County Line Road and meets up with a branch of the Little Neshaminy Creek. I am a resident of Bluestone Creek Comm and this excess water has caused flooding problems for many residents. If it is not given serious consideration the problem will only get worse. A second concern is the waste treatment (sewage) plans. The present facility off of Keith Valley Road during the summer months releases "unpleasant" odors which come into our community. I trust that if this facility is expanded, it will properly be able to handle the increased input.

0059-1

0059-2

0059-1

Thank you for your comment. Stormwater, surface waters, and floodplains are discussed within the EIS in Sections 3.8.3, 3.11.1, and 3.11.4, respectively. The potential impacts associated with these resource areas are discussed by alternative in Sections 4.8 and 4.11.

0059-2

Thank you for your comment. Wastewater treatment is discussed within the EIS in Section 3.8.2, as well as by alternative in Sections 4.8.1.2, 4.8.2.2, 4.8.3.2, and 4.8.4.2.

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Please drop this form into one of the comment boxes here at the PUBLIC MEETING or mail to:

Director, BRAC Program Management Office East, Attn: Willow Grove EIS  
4911 South Broad Street, Building 679 • Philadelphia, PA 19112-1303  
www.willowgroveeis.com

## YOUR INPUT MATTERS

0060-1  
Thank you for your comment.

0060-2  
Thank you for your comment.

From: [REDACTED]  
Sent: Saturday, January 11, 2014 13:49  
To: Preston, Gregory C CIV NAVFACHQ, BRAC PMO  
Subject: Disposal and Reuse of former Naval Air Station Joint Reserve Base (NAS JRB) Willow Grove

Greetings; 1/11/2014

I wish to express my opinions on the disposal of the base. I am retired Navy and did spend time at the base and was angered at the way actions by Horsham had been handled thus far. I do not think that options one or two would be the better choice. The impact on the environment would be too severe and if you have ever been on the road in the area in the morning or evening you would see it might not be a good thing even over the time span discussed. Perhaps a modified option three to include the PA Guard/Military reserve component on a very small basis , not to the scale it was before with Air force and or Navybut to a much smaller number. In my opinion the number of high cost housing around the base has increased a great deal and the power grid and the water resources have been taxed a great deal already? No doubt with the impact on quality of life and the impact on the environment the final choice would be best the No Action Alternative. Thank you for your time!

Lawrence R. Wheedleton USN Ret.

0060-1

0060-2