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U S NAVY RESPONSE TO U S EPA REGION I COMMENTS REGARDING DRAFT
COMMUNITY INVOLVEMENT PLAN NSB NEW LONDON CT
02/17/2011
NAVFAC MID ATLANTIC

**RESPONSES TO EPA's DECEMBER 1, 2010 COMMENTS
ON THE NOVEMBER 5, 2010 DRAFT COMMUNITY INVOLVEMENT PLAN
NSB-NLON, GROTON, CONNECTICUT**

Initial Issue: January 14, 2011; [Revised Issue: February 17, 2011](#)

Comment 1: In Section 3.1.2 (Town Profiles), include socio-economic information (e.g., demographics, median income, *and* education level).

Response: The Town Profiles will be revised to include the text shown in bold italics below:

“The Town of Ledyard: The town of Ledyard is a primarily residential community of approximately 15,000 people, and includes the village of Gales Ferry, which abuts the Subase. It is governed by a strong mayor, an elected town council, and various commissions and boards. The primary employers in Ledyard are the Foxwoods Resort Casino and the Subase. The racial composition of Ledyard is 89 percent white, 3.5 percent Native American, with all other races each representing less than 3 percent of the population. ***As of the 2000 census, there were 5,286 households in Ledyard with an average of 2.78 persons per household. The median household income at that time was \$62,647, with approximately 4% of the population being below the established poverty level. The residents of Ledyard are well educated, with 93.4% of the population older than 25 years of age having high school degrees and 31.8% having bachelors degrees or higher.”***

The Town of Groton: The town of Groton is more commercial and industrial and has a population of approximately 40,000 residents. Groton is governed by a Town Council, assisted by a Town Manager, and uses a representative town meeting structure. Major industries in Groton include Electric Boat, the Subase, and Pfizer, Inc. The City of Groton is located within the Town of Groton. The population of the city is 10,000. The City of Groton is governed by a strong mayor and six councilmen. The Avery Point Branch of the University of Connecticut is located in the City of Groton. The racial composition of Groton is 84 percent white, 7 percent African American, 3 percent Asian, with all other races each representing less than 3 percent of the population. ***As of the 2000 census, there were 15,473 households in the Town of Groton with an average of 2.41 persons per household. The median household income at that time was \$51,402, with approximately 6.1% of the population being below the established poverty level. Of the Town of Groton residents older than 25 years of age, 88% have high school degrees and 26% have bachelors degrees or higher.”***

The City of New London: The City of New London, with a population of approximately 25,000, is located on the Thames River across from the Subase. The City operates under a Council-Manager form of government, consisting of seven council members, elected at-large. From their ranks a Mayor is elected to serve a single-year term. The Council appoints the City Manager and the City Attorney, with the City Manager appointing all Department Heads. The City Council is the policy making body of the City. The Council also appoints

members of citizen-led Boards and Committees, some of which function independently and some of which serve in an advisory capacity to the Council. New London is a deepwater port of entry, with shipbuilding, high-technology research and engineering, fishing, tourism, and other industries. The City is presently in the midst of a period of economic revitalization with significant development initiatives underway at the State Pier, the Downtown and the Fort Trumbull areas. The racial composition of New London is 63 percent white, 19 percent African American, 18 percent Hispanic, with all other races representing less than 3 percent of the population. ***As of the 2000 census, there were 10,181 households in the City of New London with an average of 2.26 persons per household. The median household income at that time was \$33,809, with approximately 15.8% of the population being below the established poverty level. Of the City of New London residents older than 25 years of age, 78.4% have high school degrees and 19.6% have bachelors degrees or higher.***

The Town of Waterford: The town of Waterford is located north of New London and across the Thames River from the Subase. Waterford is a suburban community ***of approximately 19,000 residents*** with an economy based mostly on retail chains, with the notable exception of the Millstone Nuclear Power Plant. Waterford is governed by a three-member Board of Selectmen led by a First Selectman who functions as a city manager. The racial composition of the town is 92 percent white with all other races each representing less than 3 percent of the population. ***As of the 2000 census, there were 7,542 households in the Town of Waterford with an average of 2.41 persons per household. The median household income at that time was \$56,047, with approximately 4.3% of the population being below the established poverty level. Of the Town of Waterford residents older than 25 years of age, 86.6% have high school degrees and 28.1% have bachelors degrees or higher.***

Comment 2: Section 3.2.4 (Concerns About the Subase ERP) reveals criticisms that the ERP is not proactive in providing information. EPA is therefore concerned that citizens who stated that they had not been informed about investigations that occurred on their property were "...invited to contact that Subase point of contact to arrange a site tour and/or to seek further information." EPA believes that it is the Navy's responsibility to contact those individuals and proactively provide such information. While it is unfortunate that the Navy did not provide the information ten years ago, it is inappropriate to put the onus on the property owners after receiving feedback that the Navy was not proactive in providing information. The Community Involvement Plan should be a meaningful tool to enhance community involvement in the cleanup process.

Response: Section 3.2.4, as submitted to the EPA and CTDEP, did not fully reflect the Navy's actions to address concerns voiced by neighbors immediately north of the base. During the interview with the family in question, Mr. Conant spent more than two hours discussing and responding to their voiced concerns. At that time, he invited these community members to participate in a site tour or further discuss their concerns at any time. The same community members were again contacted after the interviews to follow up on the concerns voiced during the interviews. At that time they stated that their concerns had been addressed and that no further information was needed.

In response to this comment by the EPA, the following change in text, shown below in bold italics, is proposed: “The misperception that residential drinking water sources were or are being adversely impacted by the Subbase was ***corrected discussed at length and addressed*** during these interviews and ***the concerned citizens were invited to ~~contact that Subbase ERP point of contact to arrange~~ participate in*** a site tour and/or to ***meet with the Navy to further discuss their concerns*** seek information.”

Comment 3: Section 4.3.2 (Mailing List) is fundamental to improving proactive outreach. It should list the entities and residential areas (without listing actual addresses) that are included on the mailing list so that the public is aware of whom the Navy is reaching out to. The mailing list should include, at a minimum, on-base residents, residents surrounding the base, Ledyard Mayor and Town Council, Groton Town Council and Town Manager, City of Groton Mayor and Councilmen, New London Council and City Manager, Waterford Board of Selectmen, health departments, public works departments, planning departments and conservation commissions for each municipality, state representatives, federal representatives, media outlets, state and federal agencies, RAB members, information repositories, environmental organizations (e.g., Environment Connecticut, Nature Conservancy, Citizens Campaign for the Environment, Green Party of New London), interested businesses, local abutters, educational entities (e.g., Connecticut College, Three Rivers Community College), and other interested parties.

Response: The current mailing list has been updated in response to the community interviews and comments from EPA. Addresses added include interested interviewees and community members and leaders identified by interviewees. As a rule, local government officials and community leaders were not interested in receiving information via the mailing list. However, in response to EPA comments, the Navy will add the requested addressees, with the exception of on-base residents (there are no longer on-base residents on NSB-NLON) to the mailing list.

To address the concerns identified by the comment, the Navy proposes to add the following text to Section 4.3.2 as shown in bold italics:

“The mailing list ***has been*** expanded to include interested persons identified during the community interviews. In addition, residents living adjacent to the northern fenceline of the Subbase will be contacted to assess their interest in being added to the mailing list. All ***entities on the mailing list*** will be encouraged to use email correspondence ***in lieu of postal mail*** to help facilitate the Navy’s intention to use less paper in the conduct of their business. ***A list of postal mail addresses corresponding to the email addresses will be maintained by the Navy should the need arise to send out a postal mail announcement. The primary function of the mailing list will be to direct attention to new content on the NSB-NLON ERP website rather than duplicating content in mail or email format. The current mailing list includes the ERP Cleanup Team members, federal agencies (Navy, EPA, NOAA, USF&W, and the Agency for Toxic Substances and Disease Registry (ATSDR), State agencies (CTDEP), Federal and State Elected Officials, local elected officials, other local resources such as local fire, health, public works, and police departments, Restoration Advisory Board Members,***

schools and hospitals near the base (listed in Appendix D), local colleges, ~~media,~~ and environmental groups (listed in Appendix A), media outlets (listed in Appendix E), Information Repositories (listed in Appendix F), as well as businesses near the base, Chambers of Commerce, citizens and neighbors of the Subase, and who have expressed interest in the program.

The Navy will revise the order of the appendices to accommodate these changes.

Comment 4: In Section 4.4 (Time Summary for Community Relations Activities), the mailing list should be updated at least annually to capture point of contact changes that occur because of elections and town appointment changes. The Information Repositories should also be checked annually.

Response: The Navy will make the recommended changes. The Navy will review the mailing list on an annual basis and update as needed and the Information Repositories will be checked annually.

Comment 5: In Appendix E, the CIP does not reflect any adjustments suggested by the participants of the community interviews. This is an opportunity to include good suggestions and to convey to the interviewees that the Navy took this process seriously and therefore incorporated community suggestions. Since only 2 of 22 respondents felt included in the ERP process, EPA believes that the Navy should incorporate some of the suggestions rendered during the interviews.

Response: The most often repeated recommendation during the community interviews was to establish a website. This recommendation has been implemented. The second most frequently recommended activity was to inform the community via direct correspondence by sending email updates, communicating with the neighbors immediately north of the base via postal mail, or distributing a periodic newsletter, with email distribution mentioned most frequently. The Navy has identified in this plan their intention to create an email distribution list for their periodic updates (e.g., newsletter), add the neighbors north of the base to the Mailing List, and to continue distribution of their periodic newsletter to the updated Mailing List. In response to this comment the Navy proposes to modify Appendix C (former Appendix E), responses to Question 19, as shown below in bold italics, to identify the number of times each of the recommendations was made during the interviews. In addition, the information on Direct Correspondence was inadvertently omitted from the draft report and has been added here as a correction.

Website:

- ***Provide about the IRP via a website (4 responses)***
- ***Would like to see a website with a mechanism to provide feedback. (2 responses)***
- ***Link an ERP website to the Subase website. (1 response)***

Direct Correspondence (Mail, email, and newsletters):

- ***Send e-mail. (3 responses)***
- ***Mail updates to neighbors north of base. (1 response)***

- **Distribute periodic newsletter/correspondence. (2 responses)**

Community Meetings:

- Give a presentation to the Long Island Sound Study. **(1 response)**
- Invite community leaders to periodic tours of the base, perhaps via the Council of Governments. **(1 response)**
- Hold "Community Conversations". **(1 response)**
- Make use of monthly Military Affairs Committee meetings. **(1 response)**

Television/Radio:

- Access Balfour's TV channel for Navy housing. **(1 response)**
- Access 104.7 WXML Conservative Talk Radio. **(1 response)**

Further, the Navy will continuously look at opportunities to expand their outreach program as needed. At a minimum, the Navy will publicize their website with every opportunity, including **potentially** linking the website to the NSB-NLON Facebook page, hold public meetings, public hearings, and RAB meetings when appropriate, maintain close contact with the Council of Governments as a key outlet for communicating with community leaders.

To address the EPA comments, the Navy will modify Section 4.3.3 as follows:

"The Subase ERP website will allow access to the Administrative Record files as well as other ERP information. The website will be advertised at every opportunity, including an email and/or postal mail announcement of the availability of the website. ~~If possible, the~~ website address ~~may~~ will be linked to the SUBASE Facebook page to further expand awareness of the site to the general public."

Further, an additional section will be added, Section 4.3.1~~43~~, entitled "Other Community Involvement Activities" as follows:

"Additional community involvement activities will be continuously considered and implemented as appropriate. Possible activities include participation in radio or television programs, attending or presenting information at established community meetings such (e.g., the Council of Governments, the Military Affairs Committee, or the Long Island Sound Study), and holding informal community meetings."

Comment 6: Provide email addresses for the Navy, state and federal agency staff in Appendix B. The elected officials listings do not reflect the November elections and should be updated so that the CIP is not outdated so quickly.

Response: Email addresses as they will be added to Appendix **A (former Appendix B)** are listed below.

Mr. Jim Gravette: james.gravette@navy.mil

Mr. Richard Conant: richard.conant@navy.mil

Ms. Kimberlee Keckler: keckler.kymerlee@epa.gov

Mr. Mark Lewis: Mark.Lewis@ct.gov

Mr. Christopher Zendan: chris.zendan@navy.mil

Ms. Stacy Greendlinger: greendlinger.stacy@epa.gov

One elected official changed in response to the November 2010 elections; Richard Blumenthal replaced Christopher Dodd in the US Senate. Richard Blumenthal's contact information for his Washington DC and Hartford offices follows.

Senator Richard Blumenthal
G55 Dirksen Senate Office Building,
District of Columbia 20510-0702
Phone: (202) 224-2823
Email: sen_blumenthal@blumenthal.senate.gov

Hartford Office:
30 Lewis Street
Suite 101
Hartford, CT 06103
Phone: (860) 258-6940

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