

Criteria 8: Environmental Assessment and Restoration

- Substantial Deviation from BRAC Selection Criteria:
 - Exclusion of consideration of Restoration Costs unlawful
 - Underestimate of closure costs significantly skews savings projections
 - Failure to consider legal implications of Federal Facilities Agreement and land lease agreements skews costs
- The Result: Costs impacts to Navy and the community are severely underestimated – invalidating the cost/benefit assessment

Closure Costs: Immediate and Unavoidable Consequence of Base Closure

<u>Program</u>	<u>DEP Estimate</u>	<u>Navy Estimate</u>
•Hazardous Waste	\$ 3,100,000	\$ 1,000
•Underground Tanks	\$ 1,338,750	Not Identified
•Radiological	\$ 31,510,000	\$ 9,950,000
 Total	 \$41, 123,250	 \$9,951,000
 Costs Not Considered by the Navy	 \$31,172,250	

Restoration Costs – Must be Considered

<u>Program</u>	<u>DEP Estimate</u>	<u>Navy Estimate</u>
•Superfund	\$65,019,975	\$23,000.000
•Hazardous Waste	\$12,682,806	0
•Underground Tanks	\$10,865,000	Partial in Superfund
•PCB	\$ 652,147	Partial in Superfund
•Pesticides	\$35,000,000	0
•Radiologic	Unknown	
Total	\$124,943,228 (1)	\$23,000.00
Costs Not Considered by the Navy	\$101,000,000 (1)	

(1) Does not include costs attributable to radiologic remediation. Costs unknown at this time.

Closure vs. Remediation Costs

- Closure Costs = Pay me now
\$41,123,250
- Remediation = Pay me sooner
\$124,943,228

FFA and Deed Restrictions Require Clean Up Before Base Transfer

- 1) Federal Facilities Agreement requires clean up before transfer – period. Navy assumption that the property will be transferred for reuse within six years (economic impacts beyond 2011 not considered) inconsistent with FFA
- 2) Deed requires use of land by military or title forfeited to state.

1+2 =

- 3) Accelerated clean up and restoration; No Proceeds from sale or lease do not go to navy

Additional Environmental Factors Need to be Considered

- Environmental issues play key factor in military readiness and operating costs
 - Shoaling Rates:
 - New London: Dredging every XX years
 - Kings Bay: Annual Dredging and Continuous Sediment Controls
 - Storm Severity and Frequency:
 - New London: No interruption in operations
 - Kings Bay: High frequency of severe hurricanes and tropical storms mean high risk of inoperability
 - Endangered Species:
 - New London: No special restrictions
 - Kings Bay: Costly operational protocols to protect right whales, manatees and sea turtles