CENTRAL PINE BARRENS JOINT PLANNING & POLICY COMMISSION

Carrie Meek Gallagher
Chairwoman

Steven Bellone
Member

Yvette Aguiar
Member

Edward P. Romaine
Member

Jay H. Schneiderman
Member

624 Old Riverhead Road
Westhampton Beach, NY
11978

Phone (631) 288-1079
Fax (631) 288-1367
https://pb.state.ny.us/

May 20, 2020

Julie Rupp, PG
Project Manager
Department of the Army
US Army Corps of Engineers New England District
696 Virginia Road
Concord, MA 01742-2751
julia.m.rupp@usace.army.mil

RE: Suffolk County Army Airfield Bombing & Gunnery Range
US Army Corps of Engineers Remedial Investigation
Core Preservation Area of the Central Pine Barrens

Dear Ms. Rupp:

The Central Pine Barrens Commission office received your letter and map on May 5, 2020 in regard to the above-referenced proposal. Prior to receipt of the request, in March 2020, staff received telephone calls and emails regarding the project and participated in a lengthy stakeholder conference call on March 27, 2020. The project described in your letter is proposed to occur in the Core Preservation Area of the Central Pine Barrens.

A detailed project description is provided below followed by comments in regard to potential issues and opportunities in the proposal as it relates to the goals and objectives of the Long Island Pine Barrens Protection Act of 1993 and the Central Pine Barrens Comprehensive Land Use Plan.

Detailed Project Description and Activities

As described in your May 5 letter and correspondence from Todd Beckwith, U.S. Army Corps of Engineers (USACE), USACE has proposed a Remedial Investigation project at the former Suffolk County Army Airfield Bombing & Gunnery Range (Suffolk Co AAF Bombing & Gunnery Range) to determine the nature and extent of any munitions or environmental contaminants that may be present due to past Department of Defense activities in the former bombing range complex covering approximately 4,297 acres.

A contract will be awarded to complete a Remedial Investigation at the site. This will involve activities including geophysical surveys and soil sampling to determine the nature and extent of any munitions or environmental contaminants that may be present on the site due to past Department of Defense (DoD) activities.

The geographic location of the range complex, now in the Core Preservation Area, is generally in the unincorporated hamlets of Eastport, Speonk and Westhampton in the Town of Southampton. The range complex is bisected by New York State Route 27 (Sunrise Highway). The northerly limit is in the vicinity of Suffolk County Community College Eastern Campus, Wildwood Lake and Hampton Hills Golf Course. The easterly limit is roughly Exit 63 (Old Riverhead Road (CR 31) on

Sunrise Highway; the southerly limit is in an area north of Old Country Road, and the westerly limit is generally the CR 111 cloverleaf at Exit 62 on Sunrise Highway.

According to your letter, the project is part of the Formerly Used Defense Site (FUDS) Program, which includes properties that were under the jurisdiction of the Department of Defense (DoD) and transferred from DoD control prior to October 17, 1986. DoD is responsible for environmental restoration of DoD generated contamination at FUDS sites, and USACE executes the FUDS program on behalf of DoD. The USACE conducts FUDS environmental restoration activities in accordance with the Defense Environmental Restoration Program (DERP) statutes (10 USC 2701 et seq.) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

The former range complex where activity is proposed covers approximately 9,000 acres and was activated by the Army in 1943 for aerial bombing, strafing, and rocket fire training exercises. The map submitted in your request identifies general locations of target areas in the range including planes, tanks, trucks, trains, cars, houses, a submarine, and other targets. Military use of the range site ceased in 1946. The Army cleared some munitions at that time in which 20 people 25 yards apart searched and removed munitions; however, it was not an instrument aided effort and was not conducted to the level of current standards.

Subsequent investigations have found evidence of munition debris from munition constituents in 5.8 acres of the area. Samples were taken including 20 surface soil, eight subsurface, and two groundwater samples. These were analyzed for munition constituents to see if any had been released to groundwater.

The project goal is to perform geophysical surveys on approximately 60 acres out of the 4,297 acres of investigation (aka Range Complex) shown on a project area map. This would include 5-foot wide transects spaced about 1,000 feet apart, as well as 100-foot by 100-foot grids and 50-foot by 50-foot grids. The transects and grids would be spread out across the entire project site, so no clearing of any large area would occur at once. For soil sampling, a small amount of brush clearing may occur to access sampling areas.

Prior to initiating field work, the USACE will develop detailed workplans to identify all project goals and activities. The work plans will include an Environmental Protection Plan that details the operational procedures and methods that will be implemented to ensure protection of natural and cultural resources during project execution.

The data collected during the Remedial Investigation will be used to determine if there are any unacceptable risks present at the site due to past DoD activities. If there are unacceptable risks, then the USACE will:

- Evaluate remediation alternatives to address the risk in a Feasibility Study
- Propose a final remedy in a Proposed Plan, and seek public comment on it
- Select a final remedial action in a Decision Document after considering public comments
- Implement the final remedial action in the Decision Document

The USACE is in the preliminary stages of determining the scope of the investigation, but the general activities in the project involve geophysical surveys to find potential munitions at the site, digging of anomalies of interest including potential munitions, and soil sampling to determine if

there was any release of contaminants to the soil. Anomalies of interest include scraps of metal, empty munitions, contain explosives, excavate, dispose on site using explosive charges.

The remedial investigation is to gather sufficient data on the type of munitions present, diversity of munitions, distribution, horizontal and vertical extent and concentrations of contaminants of concern; perform a health and environmental risk assessment; determine if remedial action is needed and determine if there is an unacceptable risk.

Project Timeline

USACE has proposed a timeline for the project as follows:

- June 2020 - Award contact for the preparation of a work plan
- June 2020 to June 2021 (one year) – develop a work plan
- Summer/Fall 2021 – field work over four to six months
- 2022 – Issue report

Central Pine Barrens Status

In 1993 New York State adopted the Long Island Pine Barrens Protection Act which designated an area of Suffolk County within the Towns of Brookhaven, Riverhead, and Southampton as the Central Pine Barrens. The Act declared the Central Pine Barrens as a major resource area of statewide significance where the hydrological and ecological integrity is endangered. In order to protect unique features of the area, the Act required the preparation and implementation of a State supported regional comprehensive plan.

The proposal constitutes non-development activity pursuant to New York State Environmental Conservation Law (ECL) Article 57 Section 57-0107(13), which states that non-development includes:

(i) Public improvements undertaken for the health, safety, or welfare of the public.

The project is also exempt due to its environmental restoration goals, pursuant to Section 57-0107(13)(c) of the Act.

Although the project appears to constitute "non-development" activity, it is expected that, as will be the case for all property owners in the project area, the USACE will contact the Commission and coordinate activities if and when the project traverses properties where the Commission is the grantee of a Conservation Easement (CE) to ensure the activity is consistent with the provisions of the CE. Additionally, as explained further below, the project and the Commission have mutual goals, particularly in regard to fire management and stewardship, that may be achieved if the Commission continues to be engaged in the project's review and implementation.

Comments

The Commission offers comments relative to the goals and objectives of the Act and the Comprehensive Land Use Plan. These suggestions refer to publicly owned land in the project area. No suggestions are made by the Commission concerning private land. Any Commission participation in this project will be limited to public lands.

Wildfire History, Management and Plans

1. Enclosed please find a report dated March 27, 2020 prepared by Robert Panko, Commission Fire Management Specialist. This report concerns project safety, the fire behavior model, and fire break coordination.

2. The project site area is within the globally rare dwarf pine plains ecosystem which is a fire dependent ecosystem that has an extensive wildfire history and the potential for wildfire to continue to occur in this area into the future. The plan should incorporate a management and emergency plan in the event of wildfire during the project time period.

3. Since the project will occur within an area that contains a globally rare ecosystem, disturbance to existing vegetation should be limited. A significant amount of public funds was used to acquire public land for its protection, and it should continue to remain viable and intact as it was intended.

4. Ensure the areas of disturbance selected for restoration will naturally restore themselves with the existing seedbank and root structure that remains after disturbance. Post project monitoring should be employed for two or three years to monitor restoration progress. Restoration through seeding is recommended with ecotypic plant material for any areas where natural revegetation is not occurring after 2-3 years.

5. Identify all Suffolk County Tax Map parcels in the project area. The list of parcels should be available for review to confirm any known issues related to resources, ownership, or projects.

Science and Stewardship

The work suggested and described below may help provide improved public safety for those accessing public lands designated as park land for recreation and ecological management. Further, this program could provide a great benefit to reinitiate critical ecological and wildfire management including providing suitable habitat for one of the rare, richest, and most volatile ecosystems in the Central Pine Barrens. The technical assistance that could be provided by the Commission office includes:

1. Ecological and Management Reports
   - Providing existing ecological and management reports, including those created for Suffolk County Parks, to more clearly define/identify the ecological systems and drivers (e.g., limited extent, dependent species, high species richness) of the area, Threatened and Endangered (T&E) species) and engaging the New York Natural Heritage Program (NYNHP) to obtain their ecological boundary information and input.

2. Threatened and Endangered (T&E) Species
   - Assisting in providing the New York Rare Plant Status Lists (March 2019) compiled by Steve Young, Chief Botanist of NYNHP.
   - Reviewing the list of species documented by ACOE to determine if it is complete.

3. Vegetation Management Coordination
    - Providing a summary of fire history as well as wildfire potential and concerns related to surveying for and detonating Munitions and Explosives of Concern (MECs) that could inadvertently result in wildfire ignitions.
    - Providing comment and guidance on vegetation and soil management that benefits and minimizes impact to T&E species.
    - Assisting with coordination of transects and sampling areas and associated mechanical vegetation treatment types, locations and timing to help ensure they align as much as possible with Commission and landowner project, ecological, and wildfire suppression goals. Accordingly, and if these activities could be coordinated with any project-necessitated mechanical treatments, this project can provide numerous dual benefits, including but not limited to, providing important wildlife habitat and food resources; defining burn units for prescribed fire (if placed/installed in suitable locations); creating needed fire breaks and access points/escape routes; and reducing wildfire risk.

4. To meet mutual program needs, specific access and staging area location recommendations can be provided, such as using historic roads and dozer lines. This can help strategically limit access, provide access points for ecological management, provide escape routes associated with management activities and provide suitable recreational access.

5. Local, County, and State hunting regulations can be provided.

Land Use and Pine Barrens Credit Program

1. Please prepare a map of the transect survey showing the locations of disturbance described in the plan (totaling 60 acres), soil sampling areas and brush disturbance, areas where access points of ingress/egress will be disturbed, soil excavation, and any other areas of disturbance.

2. Identify the staging area for the project.

3. Project Area
    - The project area contains potentially hundreds of different tax parcels and property owners that need to be identified and contacted to request rights of entry. All tax parcels in the project area should be provided as well as ownership of each parcel.
    - The proposal should discuss how each parcel in the project will be physically identified, located, and surveyed in the field since there are little to no monuments or other visible boundary stakes. The area contains old filed map tax lots in the remote locations, such as in the middle of the woods, with no identifiable or delineated boundaries. It is not clear if each parcel will be surveyed. Surveys of parcels in the area, in some cases, have errors and title issues that need to be resolved.
    - Each property owner should be contacted to provide property access authorization.
    - Commission staff is aware that lands outside of the current project area boundaries may contain unexploded ordnances, such as in an area immediately north of Gabreski Airport. Consider a document review, research, or survey that may expand the boundaries to cover other areas that were historically used as training grounds by the military. Examine the project area and potentially widen its range, where applicable and necessary, to ensure this effort covers all potentially known areas where remains of munitions that pose a potential public safety or environmental concern have been removed or no longer pose a threat if and when they are encountered in the field. The Commission staff can provide more information as needed.

4. Clearing and Vegetation and Habitat Disturbance
    - No clearing, disturbance or encroachments can occur on parcels where access has not been granted.
    - Areas targeted for disturbance should be examined for the presence of wetland habitat. State and local wetland maps and data are available.
    - A map should be prepared showing the location and potential estimated extent of clearing that will occur, including for project area access, survey transect corridors, other areas that will be physically disturbed and cleared and areas where soil excavation activities will occur. Provide clearing and disturbance information to share with potential stakeholder agencies for their input to potentially avoid unique landscape features, habitats, or other resources and to take extra precautions to protect ecological and cultural resources, where feasible.
        - Show areas where munitions will be exploded in place, if and where they are identified and located. Emergency measures to protect public health and the environment must be employed in these activities.
        - Identify the duration of disturbance and duration of activity (months, years), and if and when disturbed areas(s) will be restored. Restoration details should also be submitted for review.
        - Identify points of entry and access roads that will be needed to access remote, wooded areas which will potentially involve clearing that is not currently identified. It is not clear where these points of entry will occur and how they will be monitored or patrolled to limit ATV access and other unauthorized activities on private and public lands. The applicant should develop a mechanism to limit access and monitor and address potential unauthorized access issues.
    - Clearing and disturbance activities should be coordinated to the greatest extent possible with the Commission and landowners and managers to achieve mutual goals for the project and fire management.

5. Restoration

    If unauthorized disturbance occurs, the applicant shall be responsible for a post-project survey and assessment to ensure restoration occurs in all areas of disturbance including sampling areas and access points. Monitor areas of disturbance for two to three years to ensure that, at a minimum, natural restoration is occurring.

Conservation Easements

1. The area includes properties that have Conservation Easements (CE) granted to the Commission by private owners through the Pine Barrens Credit Program. These parcel owners will need to be contacted to get access permission. When USACE identifies all parcels in the project area, especially ones to be disturbed, Commission staff can assist with identifying easement parcels and owners.

2. If and when the USACE intends to traverse a CE property, USACE should seek permission from the Commission regarding access and permitted activities.

Other items

1. Stakeholders. Commission staff provided the applicant with contact information for other potential stakeholders who should be made aware of the project and who may be able to provide pertinent information or assistance. These include local agency and County representatives, utilities (water, electric, gas and cable). The list of contacts included Suffolk

County Planning and Real Estate Departments, Gabreski Airport Manager, Town of Southampton Town Planning and Development Administrator, the Southampton Town Environment Division's Chief Environmental Analyst and GIS Manager, Suffolk County Water Authority, PSEG-Long Island and National Grid. All local utilities and municipal authorities should be apprised of the proposal and engaged in a review process prior to commencement of the project in the field.

2. Fire Danger Rating. The applicant expressed an interest in receiving the daily fire danger rating since this is a fire prone/dependent area. Please provide Commission staff with the names and email contact information of who should receive the daily fire danger rating report. Precautionary measures should be used during extended dry weather and field conditions such as eliminating the use of equipment that can spark, parking vehicles with catalytic converters on dry grass.

3. Equipment staging. The applicant inquired about locations to stage material and equipment. Suggestions offered by Commission staff included Gabreski Airport, the Suffolk County-owned former BOMARC (Boeing and Michigan Aeronautical Research Center) missile facility and Suffolk County Community College Eastern Campus.

4. Natural resources in the project area. New York Natural Heritage Program data and species information was provided.

5. Hunting regulations and activities. The USACE requested information on hunting activities in the project area. Timothy Huss, Commission Chief Enforcement Officer, provided information and is available to assistance and provide contacts related to the hunting season and recreational hunting user groups.

6. Public outreach and education. USACE indicated no public education or information would be prepared or posted on the project, however, if this changes, the Commission's Education Coordinator, Melissa Parrott, may be able to assist.

Thank you for your attention and for the opportunity to provide input on the project. We look forward to assisting and coordinating with the USACE to achieve our mutual goals. If you have any questions, please do not hesitate to contact me at (631) 218-1192.

Sincerely,

Julie Hargrave

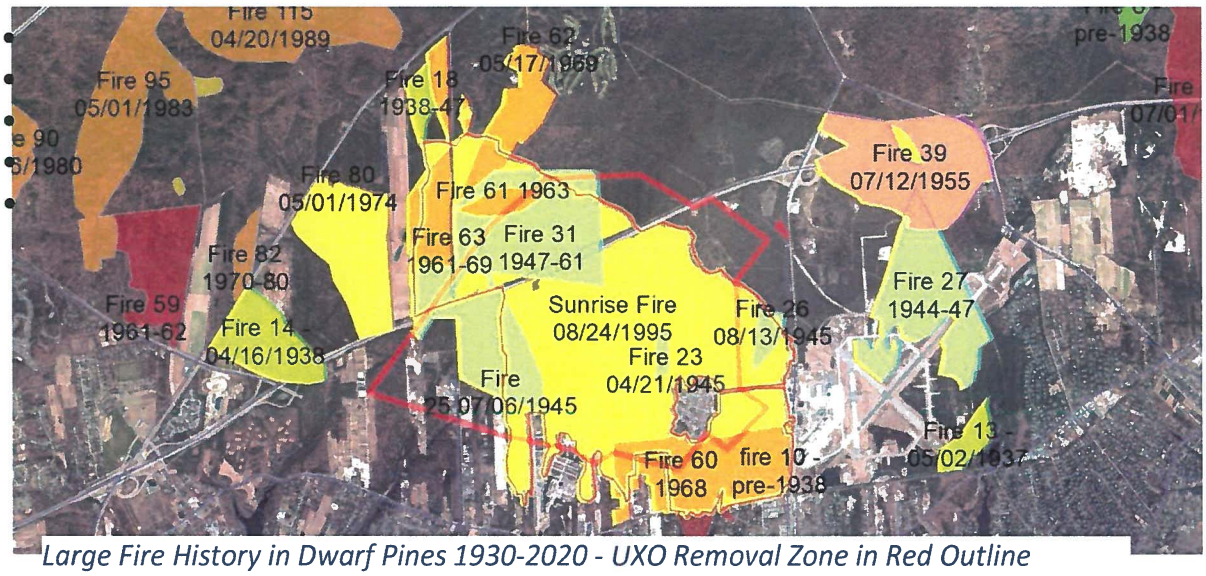
Julie Hargrave
Principal Environmental Planner

Encl.

cc: John W. Pavacic, Executive Director, CPBJP&P Commission
Judy Jakobsen, Deputy Director, CPBJP&P Commission
John Milazzo, Counsel to the CPBJP&P Commission
Polly Weigand, Science and Stewardship Project Manager, CPBJP&P Commission
Robert Panko, Fire Management Specialist, CPBJP&P Commission
Timothy Huss, Chief Enforcement Officer, CPBJP&P Commission
Todd Beckwith, U.S. Army Corps of Engineers

Unexploded Ordinance (UXO) Removal Project, USACOE Meeting Notes Bob Panko, 03/27/2020

Concerns regarding project safety: During the conference call I used the term "Stand Replacement" and I think non wildfire people misunderstood what I meant. I think people were thinking I was talking about vegetative recovery. I was not. I was talking about wildfire behavior! Stand Replacement to a wildland fire manager means that the forest burns entirely in a huge conflagration. The fire consumes the entire stand with rapidly moving and intense head fires (surface fires) and crown fires (tree tops), hence when it is done there is nothing but burned stumps. The stand then naturally replaces itself. That is what happened here in August 1995 and the "stand" is currently replaced.

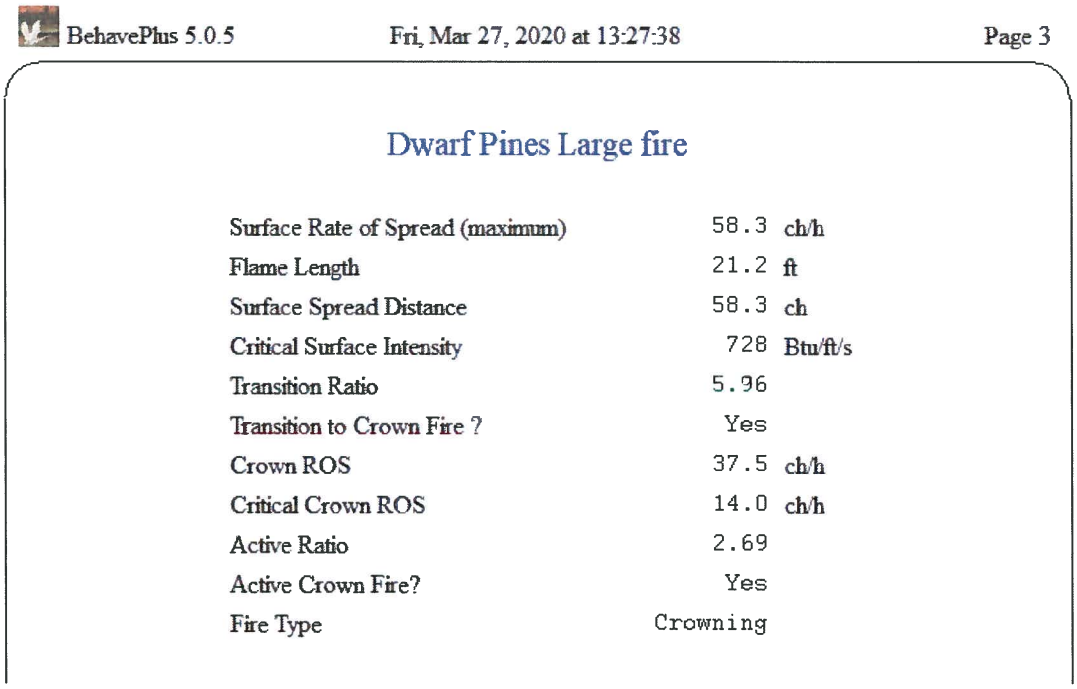


Large Fire History in Dwarf Pines 1930-2020 - UXO Removal Zone in Red Outline

- Safety of Personnel regarding fire danger:
  - Contractors need to be aware that they are working in a wildland area that has a high volume of fuel that burns very rapidly in case of wildfire (see Behave modeling runs below)
  - That this area has historically had large fires every other decade, and it has now been 25 years since the last large fire
  - Contractors need to be cognizant of current fire danger ratings and drought levels (large fires always occur during drought conditions, not just seasonally dry periods)
  - Contractors need to be certain they have pre-arranged escape routes and or sufficient safety zones in the event of a fast moving fire
  - Contractors need to practice wildfire prevention when using their machines. That includes spark arrestors and other specific fire prevention measures. Heavy equipment use is the source of many, many wildfires.
- Consequences of accidental ignition by contractors
  - Accidental ignition by contractors can produce a very fast moving fire that can burn quickly to adjacent communities, developments and transportation routes around the Dwarf Pines perimeter.

- Exploding Ordinance in situ
    - Contractors must be cognizant of fire danger ratings on a given day and not be exploding UXO finds during high fire danger conditions.
    - Explosive use needs to be designed to minimize exposure by hot debris into wildland fuel beds

Fire Behavior Modeling:



BehavePlus 5.0.5 Fri, Mar 27, 2020 at 13:27:38 Page 3

Dwarf Pines Large fire

Surface Rate of Spread (maximum)	58.3	ch/h
Flame Length	21.2	ft
Surface Spread Distance	58.3	ch
Critical Surface Intensity	728	Btu/ft/s
Transition Ratio	5.96	
Transition to Crown Fire ?	Yes	
Crown ROS	37.5	ch/h
Critical Crown ROS	14.0	ch/h
Active Ratio	2.69	
Active Crown Fire?	Yes	
Fire Type	Crowning	

Interpretation of this Behave modeling run:

This is showing what an ignition in Dwarf Pines would do under very dry Spring/Summer conditions with a 15 MPH 20' wind burning for 1 hour.

The rate of spread of the head fire would be 58 chains / hour which equals 3830 feet or ¾ of a mile/hour with flame lengths of 21 foot. The fire will also be crowning (burning in the treetops independent of surface fire).

A similar model run at right shows what can be expected with varying wind speeds. The wind speeds shown here are midflame wind speeds and we can generally say these are ½ the wind speed at 20' above the ground surface due to fraction loss caused by the foliage. With 30 mph winds at the 20' level (15 mph midflame) flame lengths would be 30 foot and the fires rate of spread 132 chains/hour = 8700 feet/ hour = 1.7 miles / hour. Under these conditions a fire would burn from the Sunrise Highway to subdivisions and developments in Remsenburg / Speonk in less than one hour if driven by a N/NW wind.

BehavePlus 5.0.5 Mon, Mar 30, 2020 at 09:16:07 Page 2

Midflame Wind Speed mi/h	ROS (max) ch/h	Flame Length ft
3	19.4	12.6
5	34.9	16.6
7	52.1	19.9
9	70.6	22.9
11	90.3	25.6
13	110.8	28.2
15	132.1	30.5

Fire Break Coordination:

Fire break construction: the colored in areas on the map below are just part of what I had been designing for prescribed burns of the future to help reduce wildland urban interface fire threats from these Dwarf Pine barrens to adjacent communities. Perhaps we can work together to use some of the needed clearing work as fire breaks to help accommodate these future burns. The contractors may also want to build some firebreaks and safety zones to protect them in case of wildfire.