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ATTN: Captain D. Jason Murley

Friday, February 28, 2014

PUBLIC COMMENT

RE: Revised Environmental Assessment, Military Housing Privatization Initiative (MHPI), Val-Del Road, Moody AFB, Georgia

We sincerely appreciate being granted the opportunity to submit this public comment regarding the revised Environmental Assessment (EA) of the proposed Military Housing Privatization Initiative (MHPI) northwest of Valdosta, Georgia, on Val Del Road (also referred to as the “Val Del parcel”). It should be noted that the revised project presents a reduction of 83 homes at the Val Del site when compared to the original proposal we responded to in August 2013. In order to provide clarity on this matter of a significant change in the MHPI design, we request that the language adopted in a final document clearly indicates that the currently evaluated site is referring to the former Phase 1 (or the eastern section) of the previously released version of the EA in July 2013.

As we noted in our public comment in August 2013, the area under consideration for this housing project displays unique geophysical conditions so that the geological and hydrological circumstances (i.e. karst topography) need to be studied more carefully and in a larger geographical context to address two main issues: 1) the safety of potential inhabitants of the new housing units, should the project go forward, and 2) environmental concerns, as the Upper Floridan aquifer strikes close to the surface in this area, so that proper drainage management is crucial in order to avoid the direct piping of pollutants into the aquifer.

With the revised EA we now have access to information that fills in gaps that existed until recently since the geophysical report, which formed the basis for the July 2013 EA, was not shared with the public and since we were denied access to the site. We are happy to note that in October 2013, following our public comment, additional geophysical testing was conducted at the Val Del site to further study anomalies that were apparently identified in an earlier EA. It appears that geologists from Geohazards, Inc. had in fact called for SPT borings in those areas following their initial investigations reported on November 14, 2012. It would have been very helpful and would have allayed many of our initial concerns if some of this technical information had been provided upon our request following the release of the previous environmental assessment in August, 2013.

Although we were quite impressed by the science contained in the current EA, the lack of transparency in the process, which led to the finding of “no significant impact”, raises a number of questions. It would seem that the landowner and developers feared public scrutiny during this process. Yet, the citizens of Lowndes County have a vested interest in the groundwater resources beneath this site, as well as the overall safety of the housing units in our community. Not allowing access to the site to an independent geological consultant for the U.S. Army Corps of Engineers (USACE), the environmental branch at Moody Air Force Base, or VSU faculty with an expertise in hydrogeology and karst topography, simply undermines the trust of the public in the validity of any EA.

In respect to the current EA, which focuses on the eastern portion of the parcel, the layout of the subdivision has been revised to work around anomalies identified by ERI readings and targeted with SPT borings. In order to ensure that all concerns raised in the EA are properly addressed, the best practice to follow in construction would be to require a licensed professional geologist on site in case subsidence begins to occur as the site is being prepared for construction. Shallow infilled channels or paleokarst features may need to be excavated and filled with aggregate near the surface. Raveling in voids or fractures at depth may also require that they be filled if they begin to extend close to the new foundations.

We also remain concerned about the hydrology of this site which sits on a recharge zone for the Upper Floridan aquifer. The executive summary outlines plans to mitigate impacts through purchasing wetlands at a USACE-approved location through the Section 404 permitting process. In addition to satisfying the legal requirements in this area, the local community needs to be reassured that the aquifer is protected and the mitigation takes care of the function which existing wetlands have in filtering surface waters which reach our groundwater.

Respectfully,

(Dr. Donald Thieme, Geosciences)

(Dr. Can Denizman, Geosciences)

(Dr. Michael G. Noll, Geosciences)