



DEPARTMENT OF THE AIR FORCE
102D INTELLIGENCE WING (ACC)
MASSACHUSETTS AIR NATIONAL GUARD
OTIS AIR NATIONAL GUARD BASE MASSACHUSETTS

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Col James LeFavor
102d Intelligence Wing Commander
158 Reilly St, Box 3
Otis ANGB, MA 02542-1330

Mr. Niedzwiecki
Executive Director, Cape Cod Commission

Dear Mr. Niedzwiecki

After a review of the Draft 208 Plan the 102d IW would like to make the following comments and recommendations:

a. The term JBCC is an efficient way to describe the installation as a whole, but when talking of specific components, it is more accurate to use the actual *Base* or *Command* name. Multiple times throughout the document, "JBCC" is used when in reality, the term "102d IW" would be correct. The 102d IW is the owner/operator/provider for all the utilities in the lower cantonment area as well as some sections of the upper 15. So, for example, calling it the "JBCC WWTP" is inaccurate. It is the 102d IW's WWTP. It is the 102d IW's RIBs. This slight difference may cause confusion to others as to who has final authority and ownership of the various real property elements.

b. Page 6-5: It states the town of Mashpee has identified that they would be interested in using the 102IW treatment facility. Is this confirmed? We thought they were not interested.

c. Page 6-10, 3rd column: "Treated wastewater from the onsite WWTP is pumped through a 10.5 mile long effluent force main and used to recharge groundwater through rapid infiltration beds (RIBs), which are located on the northern boundary of the installation."

-This is not true. The water is *not* used to recharge the aquifer after the infiltration beds, but rather is released into the canal. This step was at the request of the community back in the 1990's when the system was being built.

d. Page 6-13: The first paragraph states, or infers, that JBCC contributes to increased nitrogen levels to the watershed. In reality, through the 102d IWs waste water system, the users of JBCC do not add to watershed nitrogen levels at *all* (within the cantonment area).

e. Page 6-13: Second paragraph, last sentence. Can you state whose opinion it is that non-military uses should not compete with municipal economic development?

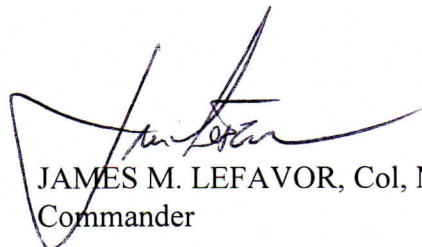
f. Page 6-13: Third paragraph states that, "It is in the best interest of the military... to prioritize allocation of the excess capacity of the JBCC for the needs of the neighboring towns..." Again, whose opinion is this? I think I know what the intent here is, but the wording gives me pause. To my knowledge, none of the 4 base military services ever said or agreed to a statement like this. We may need this excess capacity for future military growth. For example, if the USCG decides they want to increase their presence and personnel here, we wouldn't want anything preventing that such as this prioritization of waste water excess capacity.

g. Page 6-13: Fourth paragraph discusses establishing a no-net nitrogen policy for land uses within nitrogen sensitive watersheds for all of JBCC. Such a policy could restrict future military operations and/or growth. As always, any growth will meet all federal and state requirements for development. But is further restriction needed? Will the surrounding towns that abut the watershed also have this restriction in place? Have all 4 military services/commands been involved in discussion of establishing such a policy? I'm not sure that such a policy via an MOU is in the best interest of any of the 4 services.

The 102d IW remains a steadfast partner with the other base entities as well as the local community. As the owner/operator of the JBCC utilities as well as many other base services, we have to take precautions that through such partnering we don't inadvertently enter into agreements that might impact any of our military missions.

Thank you for allowing me to submit these comments, and I am available for further discussion anytime. My office number is 508-968-4667.

Sincerely



JAMES M. LEFAVOR, Col, MA ANG
Commander