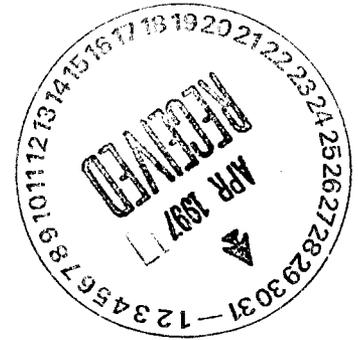


Gordon J Ewing  
4040 Cholla Road  
Las Cruces, NM 88011-7603

27 April 1997

Stephanie Kruse  
NMED  
Hazardous and Radioactive Materials Bureau  
P. O. Box 26110  
Santa Fe, NM 87502



Dear Ms Kruse



Thank you sending me a copy of Sewage Lagoon Closure Plan for Holloman AFB. I have been a representative of Mesilla Valley Audubon Society working with Holloman AFB concerning the wildlife habitat in the Holloman Lake area for the last several years. We have been extremely pleased to work with the people in the Environmental Flight at HAFB. Usually we find ourselves in an adversarial relationship with organizations when we try to get them to make changes that are environmentally sound. HAFB is not only willing to listen to suggestions from Mesilla Valley Audubon, they were often ahead of us, having already begun discussing our recommendations before we made them. I can only think of one proposal that I have made that has not been incorporated into their plans as yet. I have suggested that one of the peninsulas extending into Lake Holloman from the west side be cut off to form an island. This island would become an area protected from terrestrial predators for nesting water- and shorebirds, but that is not why I am writing this letter.

The closure plan proposes to dry out Lagoons A through F and cover them with clean soil, restoring the original contours and vegetation and keeping the area fenced. Since 4000 tons of PCB contaminated soil has already been removed from the first 2 lagoons, we support this closure plan.

It has been proposed that Lagoon G remain as an open body of water even though low levels of pesticide residues have been detected in the muds underlying the pond, especially near the inflow areas. We at MVAS think that the evaluation of Lagoon G should not be between Lagoon G with NO contamination and Lagoon G with minimal contamination, but more realistically it should be between Lagoon G with minimal contamination and no Lagoon G (dried, and covered with soil as the other 6 Lagoons). Of the latter two alternatives, we strongly favor the preservation of the lagoon. Three reasons for this are given below.

1. For many years, Lagoon G has provided 40 acres of open water for waterfowl and shorebirds. This has occurred with no evidence of harm to those birds. It is probably most

important as a refueling stop for migrants, both in spring and fall. 40 acres of open water is a rare commodity in Southern New Mexico.

2. In the Holloman Lake area there are four distinct types of wildlife habitat that depend on HAFB runoff and wastewater for their existence: a) permanent open water, b) shallow water and moist soils with grassy type vegetation, c) mostly nonvegetated beaches and playas that are intermittently covered with water and d) riparian areas. All four of these habitats should be preserved to increase the variety of wildlife in the area. The wetlands (b) have been relatively rare in the area. The newly constructed wetlands has a potential of over 100 acres of this type of habitat.

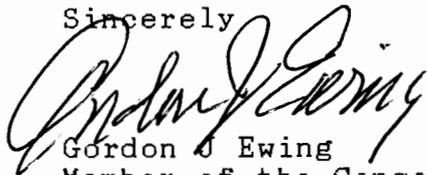
Lagoon G along with Holloman Lake makes up the open water (a) habitat as mentioned in part 1). It also plays a vital part in the emergent wetlands, (b), by storing water above constructed wetlands which lie between Lagoon G and Holloman Lake. This storage capacity will permit better management of these wetlands.

3. The lagoon is also potentially of value in insuring that the beaches and the Stinky Playa are periodically flooded to keep them biologically active. The storage function of Lagoon G can assist in the flexibility of managing these playa type areas.

The riparian area is a separate problem. Currently it is almost entirely a monoculture of salt cedar. Attempts should be made to establish native trees in the area. Possibly cottonwoods and willows, but that is a separate problem. This can be evaluated after the constructed wetlands become stabilized.

We at Mesilla Valley Audubon Society approve of the closure plan sent to us under a cover letter dated 27 March 1997.

Sincerely



Gordon J. Ewing  
Member of the Conservation Committee  
Mesilla Valley Audubon Society