



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 377TH AIR BASE WING (AFMC)

ENTIRE

4 MAY 1994

Felix Sanchez, Colonel, USAF  
377 ABW/CC  
2000 Wyoming Blvd SE  
Kirtland AFB NM 87117-5606

Congressman Steven Schiff  
625 Silver Ave SW, Ste 140  
Albuquerque NM 87102

Dear Congressman Schiff

I would like to thank you for your efforts and assistance since 1989 in establishing the Bernalillo County/Kirtland Air Force Base (BC/KAFB) Environmental Working Group (EWG). The EWG has evolved into an effective means by which KAFB and citizens meet on a regular basis to discuss citizen concerns about the environment, exchange ideas, and obtain information respective to KAFB's environmental compliance and restoration programs. Through the EWG, the public also participates in the environmental decision-making process as it applies to the base's Resource Conservation and Recovery Act (RCRA) corrective action program. Citizens are provided copies of corrective action documents for their review, comment and recommendations prior to final submission and implementation.

As you are aware, the Federal Facility Environmental Restoration (Keystone) Report of 1993 recently recommended that Site Specific Advisory Boards (SSAB) be established to improve the Federal Facility Environmental Restoration (FFER) decision-making process and ensure that clean up decisions reflected the priorities and concerns of stakeholders. The Department of Energy (DOE) is interested in the SSAB concept and is moving to establish a SSAB for its facilities. Members of my environmental staff have been attending SSAB formulation meetings for Sandia National Laboratories and other DOE activities in the Albuquerque area as observers. Some citizens groups have advocated that KAFB establish a SSAB which would incorporate Air Force, DOE and KAFB associate activities.

While we can appreciate public interest in the SSAB concept, we cannot support the establishment of a SSAB at KAFB at this point in time. The Department of the Air Force has not endorsed the SSAB as the most effective method of public involvement and has proposed its facilities establish Restoration Advisory Boards

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(RAB) in lieu of SSABs. The RAB concept incorporates many of the recommendation made in the Keystone Report and will, like the SSAB, limit citizen involvement to the environmental restoration/ clean-up arena. The RAB approach appears consistent with the following quote from Page 22 of the interim Keystone Report:

“Where site advisory boards already exist, the Committee intends to build upon existing groups and not to supplant them, particularly where they have proven successful.”

The existing EWG presently provides citizens an avenue to participate in many phases of the environmental restoration decision-making process as well as a mechanism for the exchange of ideas and information on non clean-up issues. EWG membership is open to any bonafide organization or citizens group. Unlike the SSAB or RAB, the EWG does not require a “balanced” representation and does not limit the number or participants or members. Furthermore, at the August 1993 meeting, EPA officials noted that our EWG is one of the most effective community relations forums in EPA Region 6.

We have a number of concerns regarding the formation of a SSAB at KAFB, especially if its is structured to combine KAFB, DOE and associate organizations:

a. The costs of forming and operating a SSAB are considerable. Funding of members’ participation in any meaningful way could cut deeply into funds needed and earmarked for restoration at KAFB and DOE facilities. This would delay site restoration at KAFB well beyond the projected FY2000 completion goal. We understand that the Office of Management and Budget (OMB) has expressed funding concerns.

b. The scope of environmental issues addressed by either a SSAB or the RAB would be more limited than those currently raised in the EWG.

c. Federal facilities only have an *ex officio* status in the proposed SSAB program. It appears the rationale behind precluding federal entities full membership results from a perception that their membership would unduly influence SSAB decisions. In our opinion, they should be afforded more authority than this because they are subject to compliance orders, administrative/civil and criminal penalties, etc. under the Federal Facilities Compliance Act (FFCA). We also believe citizen groups can be just as vulnerable to conflicts of interest and special agendas as federal entities.

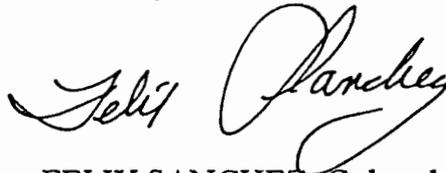
d. Budgeting should not be open to public scrutiny and review. As clean-up contracts are advertised and negotiated, funding availability is closely guarded information. This is done to ensure open and honest competition among contractors in the federal procurement process.

e. The Air Force and DOE currently operate under several separate Hazardous and Solid Waste Act Part B RCRA permits and have different compliance schedules. One site-wide SSAB could neither adequately address all permit issues nor provide individual federal facility members the degree of public interaction they now enjoy under EWG and equivalent DOE functions.

Kirtland Air Force Base, therefore, proposes to continue the EWG, possibly with some modifications, and await further guidance regarding RABs. If the Department of the Air Force decides to formally adopt the RAB program, we would like to implement a BC/KAFB RAB. We would like your support for this plan of action. We strongly feel the RAB will prove to be an acceptable means for stakeholders to address concerns and provide input on environmental issues at Kirtland Air Force Base. We welcome any suggestions or initiatives citizens and environmental groups may have to improve the current EWG program.

I look forward to hearing from you. My point of contact on this matter is Colonel Thomas A. Norris, Director, Environmental Management Division, 846-2751.

Sincerely

A handwritten signature in cursive script that reads "Felix Sanchez". The signature is written in dark ink and is positioned above the typed name.

FELIX SANCHEZ, Colonel, USAF  
Commander