

Response to Comments
Analysis of Brownfield Cleanup
Alternatives
Homer HERC Buildings
March 27 – April 24, 2026



Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Contaminated Sites Program
May 2026

Publication Information

This Response to Comments (RTC) document will be sent by email or mail to commenters that provided contact information. The document will be available on the Contaminated Sites Database online at <https://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/27933>.

ADA Accessibility

DEC complies with Title II of the Americans with Disabilities Act of 1990. If you are a person with a disability who may need accommodation in order to participate in this public process, please contact Megan MacPherson at megan.macpherson@alaska.gov, 907-269-3096, Alaska Relay Service/TTY/TDD 800-770-8973, or dial 711 within 10 days prior to closure of this public notice period to ensure that any necessary accommodations can be provided.

Contents

Publication Information.....	ii
ADA Accessibility.....	ii
Introduction	1
DEC Public Involvement Actions	1
Response to Comments	2
Comments and Responses.....	2

Introduction

This Response to Comments provides the Alaska Department of Environmental Conservation (DEC) Contaminated Sites Program's reply to public comments received on the draft Analysis of Brownfield Cleanup Alternatives (ABCA) for the Homer Education and Recreation Complex (HERC) buildings in Homer, Alaska.

The DEC would like to thank the public for their time and consideration in commenting on the draft ABCA. An ABCA is required for any project using EPA brownfields cleanup funding. Should the City choose to apply for an EPA Brownfields Cleanup Grant, the ABCA finalized through this process would meet that requirement.

In accordance with EPA programmatic requirements, an ABCA must include a public participation process prior to being finalized. The public participation process for the Homer HERC ABCA involved submitting a Community Relations Plan to EPA, providing notice to the general public, accepting public comments on the ABCA for four weeks, preparing a written response to significant and appropriate comments and presenting the ABCA findings to the Homer City Council during a public meeting. An administrative record containing all documents pertinent to cleanup decision will be available on DEC's Brownfields webpage.

The regulatory authority for oversight of treatment and disposal of contaminated soil is found within 18 AAC 75 Article Three.

DEC Public Involvement Actions

A finalized Community Relations Plan (CRP) was submitted to EPA on March 16, 2026. The public comment period for the draft ABCA began March 27 and ended on April 24, 2026. It was announced via news releases on local radio, published on the community calendar, and published online via the State of Alaska's public notice system. The public notices described how to gain access to and submit comments on the draft ABCA to DEC's online public comment form or mailing address. The draft ABCA was published online, and hard copies of these materials were available for review upon request. On February 12, 2026 DEC staff presented information and took questions about the draft ABCA to the public at the Kenai Peninsula College in Homer. A written response to comments containing all documents pertinent to the cleanup decision was published to the DEC Brownfields webpage on May 25, 2026. Additionally, as part of the administrative record, this response to comments document was posted on the Contaminated Sites Database under File No. 2314.38.043.

Table 1: Community Engagement Related to ABCA Public Comment Period

DEC provides draft ABCA to the City of Homer for final review	November 11, 2025
DEC staff attend a public meeting at the Kenai Peninsula College to discuss the draft ABCA	February 12, 2026

and public comment period.	
DEC provides Community Relations Plan to the Environmental Protection Agency	March 16, 2026
30-day Public Comment Period Notice and ABCA documents posted on the DBAC and State of Alaska Online Public Notices websites.	March 27, 2026
Public Comment Period Closed	April 24, 2026
DEC posts response to public comments on the DEC Brownfields and State of Alaska Online Public Notice websites.	May 25, 2026
DEC staff attends Homer City Council meeting to discuss results of public comment period.	May 27, 2026

Response to Comments

DEC received four submittals from the public. The submittals were received both through the website and as direct emails to the DEC project manager during the four-week public comment period.

The submitted comments as they were received by DEC are included as Attachment 1. The submittal includes comments and information on items that are not part of the ABCA document. The comments noted below are summarized from the submittal.

Comments and Responses

Comment on Alternative 2, 4, & 5

The commenter provides edits to improve the clarity of the document and also suggests the inclusion of encapsulating lead-based paint (LBP) in HERC 1 and the demolition and disposal of HERC 2 to allow continued access by the community.

DEC Response:

DEC and the City of Homer had requested that the demolition and disposal of HERC 2 be separated from the broader project scope, however, disposing of the buildings separately was predicted to almost double costs. Encapsulation of the LBP in HERC 1 has already been completed by the City of Homer. A sentence regarding demolishing the buildings separately will be added to the final version of the report.

Comment on Alternatives 3

The commenter expresses concern about the amount of money already spent on the HERC properties to investigate hazardous building materials (HBM), and expressed concerns that no follow-up testing

has been done in the lawn areas or the parking lot, and no continued air monitoring has been offered for the air ducts, vents etc.

DEC Response:

A release of asbestos containing materials (ACM) was investigated in the front lawn where it is most likely to have occurred. The results demonstrated no detections of asbestos in soil. LBP was investigated in the dripline of both buildings where paint chips are most likely to accumulate. Results from sampling did demonstrate detectable levels of lead in soil, but these were all below the most stringent DEC clean up levels for residential areas. The highest detected level of lead in soil was 190 milligrams per kilogram (mg/kg) at sample H1-53-03-052125, below the 400 mg/kg cleanup level. This sample was taken from the west side of HERC 1.

HBM analysis of asbestos in the building occurred in 2020 and 2023 by two different contracting firms. In 2020, 191 bulk layers were collected from 99 sample locations within the buildings; 23 of these were found to contain asbestos-containing materials (ACM) between 2.4 – 80%. ACM was identified in the floor tile mastic, pipe insulation, and joint compounds in both buildings. In 2023, 78 bulk layers were collected from 64 sample locations within the buildings; 39 samples were found to contain ACM between 1.1-85%. ACM was identified in the floor tile mastic, ceiling mastic, pipe insulation, joint compound, sealant, putty, and other miscellaneous building materials. The HBM inventory in 2025 focused mostly on LBP, as this was identified as a data gap. It is possible that additional ACM exists in the building as the contractors did not destroy walls, chases, or any other building spaces while performing these assessments.

Soil sampling results can be found in the *Site Characterization Report*, and the hazardous building materials results can be found in the *Limited Hazardous Building Materials Inventory* dated September 2025 and uploaded here

<https://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/27933>

The City of Homer applied for DEC Brownfields Assessment and Cleanup (DBAC) grant services which were provided to the City at no cost.

Comment on Alternatives 2 & 5

The commenter expresses that an option for encapsulation of LBP in HERC 1 and a demolition and disposal of HERC 2 was not considered. This would allow for the safe, continued use of HERC 1 while getting rid of HERC 2, which is more of a hazard to the community.

DEC Response:

DEC and the City of Homer had requested that the demolition and disposal of HERC 2 be separated from the broader project scope, however, disposing of the buildings separately was predicted to almost double costs. Encapsulation of the LBP in HERC 1 has already been completed by the City of Homer. A sentence regarding demolishing the buildings separately will be added to the final version of the report.

Comment on Alternatives 4 & 5

The commenter expresses that that the HERC is an old, outdated pair of buildings that should be torn

down. The main building gym is too small for the activities it is trying to support and has no handicapped access.

DEC Response:

DEC acknowledges these concerns and recognizes the importance of safe, functional, and accessible community facilities. The purpose of the current project is to evaluate environmental conditions and potential cleanup considerations associated with the site, which may help inform future decisions regarding the property.

Attachment 1: Public Comments Submitted to DEC for the Homer HERC
Analysis of Brownfields Cleanup Alternatives (ABCA)

MEMORANDUM

TO: Flannery Ballard, Brownfields Program Specialist
FROM: Janette Keiser, PE
Date: March 31, 2025
RE: Comments to report entitled “Homer HERC Buildings, Analysis of Brownfield Cleanup Alternatives”, dated September 2025

I have reviewed the report identified above and have the following comments:

1. Page 1 Paragraph 1(a). It would be helpful to identify the KPB Parcel Number and boundaries for the property.
2. Page 2 Please provide a drawing showing the general locations of the test holes.
3. Page 8 Paragraph 4 The comment “*the local community has expressed their disinterest in this alternative...*” is premature and over-broad since public comment on this report is just now being collected. Who do you mean by “*the local community*”? I suspect what you mean is that City staff has expressed this opinion. If this is the case, please be more specific about who voices these opinions.
4. Page 8 In the middle of the page, multiple alternatives are identified. Then, in later pages, the effectiveness of each alternative is discussed. Then, in later pages, the estimated cost of each alternative is discussed. This jumping around makes it more difficult to follow the analysis of the alternatives. Organizationally, it would be better to identify an alternative and discuss its effectiveness and cost in the same section.
5. Page 8 Would encapsulating LBP in HERC 2 allow continued use of HERC 1?
6. It would be helpful to include a little table that summarizes the elements of the alternatives.
7. Page 9 Please avoid comments like “*This alternative is favorable to the local community*” without specifying the source of this opinion – a community survey, a city employee, an elected official...
8. Page 9 The word “Implementability”, as the title of a section, needs to be moved to Page 10, where that section starts.

9. Page 10 The report says “*there are no costs associated with “no action.”*”
This is not true.

- a. The section on Effectiveness said “*the buildings would continue to deteriorate and potentially pose a risk to public health*”. Surely, there would be costs associated with risk of harm or at actual harm to public health.
- b. The reports speaks, in multiple places, about the city’s desire to repurpose the property. “No Action” would cost lost opportunities. For example, the City wants to build a Recreation Center. If this property were available, it would make the perfect site for such a Center. If the land is not rehabilitated, one of the most visible and prime pieces of real estate in Homer is lost to development. This is a huge cost!

From: [ADEC Public Notice Comment Submission](#)
To: [Ballard, Flannery \(DEC\)](#)
Subject: We have received a comment for Request for Public Comments on the Analysis of Brownfield Cleanup Alternatives at the HERC Buildings in Homer, AK
Date: Friday, April 24, 2026 7:51:28 AM

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

OPN ID	223118
Umbraco Node ID	43000
Open Date	03-27-2026
Close Date	04-24-2026
DEC Division	Spill Prevention and Response
Title of Notice	Request for Public Comments on the Analysis of Brownfield Cleanup Alternatives at the HERC Buildings in Homer, AK
Today's Date	04-24-2026
Contact	flannery.ballard@alaska.gov
Display Name	Rex Murphy
Submitted By	Individual
Name	Rex Murphy
Address	255 Whispering Meadows, HOMER, Alaska
ZIP Code	99603
Email	Rex.murphy.ak@gmail.com
Your Comment	Comments on HERC 1. The cost to deconstruct the buildings will only increase with time. 2. Were the hazmat issues with the buildings fully disclosed in the borough to city transfer paperwork? If not, then the borough should be responsible for the cleanup.

3. There are other old buildings in the state with similiar hazmat issues. Has anyone researched the possibility of creating an in-state site to accept building hazmat materials from old buildings in need of replacement?

4. The HERC is an old, outdated pair of two buildings that needs to come down. The main building gym is too small for the activities it is trying to support and has no handicapped access.

I understand the above disclaimer.

Yes, I understand

From: [ADEC Public Notice Comment Submission](#)
To: [Ballard, Flannery \(DEC\)](#)
Subject: We have received a comment for Request for Public Comments on the Analysis of Brownfield Cleanup Alternatives at the HERC Buildings in Homer, AK
Date: Thursday, April 16, 2026 9:03:25 PM

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

OPN ID	223118
Umbraco Node ID	43000
Open Date	03-27-2026
Close Date	04-24-2026
DEC Division	Spill Prevention and Response
Title of Notice	Request for Public Comments on the Analysis of Brownfield Cleanup Alternatives at the HERC Buildings in Homer, AK
Today's Date	04-16-2026
Contact	flannery.ballard@alaska.gov
Display Name	Carly Chayes
Submitted By	Individual
Name	Carly Chayes
Address	3776 Lake Street, Homer, Alaska
ZIP Code	99603
Email	chayes@gmx.com
Your Comment	The on-going conversations regarding the HERC have cost the city of Homer too much money., too much time and energy. The citizens of this community are wondering how much more? And why.? It would seem that from the on-set there was no oversight in the grasping at straws so to speak, hire this agency, that consultant, etc. , and to no end. Supposed professionals glad to accept a big fat check, and no one actually seeing the issue for what it is which, this hazardous building is not just a eye-sore

but more importantly an on-going safety liability. At this point to further allow the public any access to the building and surrounding buildings there will be health category lawsuits in the very near future. It is completely irresponsible that the city has allowed the public entry even with the knowledge that the adjacent removal of asbestos had been cleaned-up, There was no follow-up to test the lawn areas or the parking lot, and continue to test for air ducts, vents, etc. Please DO NOT spend any more reserves on the obvious. Find grants, endowments, solutions from other towns and cities and eventually bulldoze the entire area. Please.

I understand the above disclaimer.

Yes, I understand

From: [ADEC Public Notice Comment Submission](#)
To: [Ballard, Flannery \(DEC\)](#)
Subject: We have received a comment for Request for Public Comments on the Analysis of Brownfield Cleanup Alternatives at the HERC Buildings in Homer, AK
Date: Tuesday, April 21, 2026 2:42:16 PM

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

OPN ID	223118
Umbraco Node ID	43000
Open Date	03-27-2026
Close Date	04-24-2026
DEC Division	Spill Prevention and Response
Title of Notice	Request for Public Comments on the Analysis of Brownfield Cleanup Alternatives at the HERC Buildings in Homer, AK
Today's Date	04-21-2026
Contact	flannery.ballard@alaska.gov
Display Name	Patrick Houlihan
Submitted By	Individual
Name	Patrick Houlihan
Address	35895 N Fork Rd, Anchor Point, Alaska
ZIP Code	99556
Email	patrickhoulihan.ak@gmail.com
Your Comment	The smaller boarded up HERC building could be torn down at any time. It would open up the view for guests and tenants of the Windjammer Suites. However the larger HERC building has a gymnasium used daily by hundreds of residents. It also houses the Public Works Parks and Building Maintenance divisions. The larger HERC should not be torn down, it is a fully functional building. It should receive a roof repair by such as a hot mopping of a rubberized roofing product over the entire

roof. Patches done by Public Works, are only temporary. There is nothing really wrong with HERC1 and even the lead paint issue in the Multipurpose Room was mitigated. New flooring was applied in that room and the gym floor was refinished. There is no compelling reason to remove that building and certainly not before an alternative gymnasium is conceived, built and paid for.
Thank you for considering my comments.
Patrick

I understand the above disclaimer.

Yes, I understand