

Fort Monmouth Economic Revitalization Planning Authority

2-12 Corbett Way, Suite C · Eatontown, New Jersey 07724 · Tel: 732.935.5966 · Fax: 732.935.7440

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Public Affairs Office – Environmental Assessment Comments IMNE-MON-PA, Bldg. 1207, Room G-07 Fort Monmouth, NJ 07703

Subject: Final Environmental Assessment of the Implementation of Base Realignment and Closure at Fort Monmouth, NJ

Gentlemen:

The following are our specific comments which reflect issues and concerns identified in this report.

- 1. Table 1 Summary of findings of effect: a) The statements with regard to socioeconomic environment sidestep the enormity of the economic impact as well as the length of time for any recovery to be in place. b) Utilities while demand will be reduced, stagnancy, particularly of the water system, will have a deleterious effect. c) Hazardous and toxic substances The disposal statement should read "remedial activities will reduce on-site contamination." The current use of the word "would" implies a lack of ownership responsibility on the part of the Federal Government.
- 2. Section 1, subparagraph 1.4.1 p. 1.4: The bullet at the top of the page talks about fast-tracking the environmental cleanup, but the footnote says that program is no longer applicable. Then why is it in there? Either remove the statement or explain the footnote's applicability.
- 3. Section 2, subsection 2.3.2 p. 2.3: The list of contaminants fails to mention asbestos, which is known to exist in numerous buildings throughout the Fort. While asbestos-containing-materials (ACM) are mentioned on p. 3-4 as encumbrances, they should also be listed here. Similarly, the use of lead-based paint should be listed.
- 4. Section 3, subsection 3.2.3, p. 3-4: Reference is made to the existence of groundwater contamination below several parcels of Fort Monmouth. Correspondingly, there is no on-post use of groundwater, which would carry a similar prohibition in the subsequent transfer of property. There needs to be a clear statement of what remedial plans and actions are being or will be undertaken, such as pump and treat, to mitigate this condition. Without same, this condition will be a major deterrent for redevelopment of the affected parcels, and the Fort in general.

- 5. Section 3, subsection 3.3: It would not be in the best interests of either the Army or the affected communities for the Army to reduce their level of caretaker maintenance based on a preset time table.
- 6. Section 3, subsection 3.5.4, p. 3-9: In the final paragraph, starting on the third line down, change the percent set aside to 20 percent. This is stated in the Plan in the Community Impact section (8.3, table 4); therefore, 25 percent is incorrect.
- 7. Section 4, subsection 4.7.1.2, p. 4-34: Statement is made starting on line 11 that five (5) groundwater-supplied irrigation wells have been active on the Charles Wood Area Golf Course (Suneagles). This seems to contradict an earlier statement that there is no use of groundwater on the facility. Please clarify, as this is important to the reuse of the golf course.
- 8. Table 4-14 Historic Buildings, etc., p. 4-42: There have been changes to the status of several items in this table a) The tennis courts have been removed from the list; b) Buildings 2018 and 2910 have been removed from the list.
- 9. Table 4-16 World War II temporary structures, p. 4-43: Reference to NJSHPO's evaluation of building 900 as needed for concurrence is incorrect.
- 10. Recommend that Subsection 4.10, Socioeconomics, be reviewed and made current in light of the current economic circumstances and influences.
- 11. Section 4.12, Subsection 4.12.1.1, pp. 4-65 & 66: The comments on the potable water supply lead one to believe that the system is without problems and that "FMERPA presumes the system to be in fairly reliable condition." FMERPA makes no such presumption, and, in fact, anticipates that the quality of water and the system needs further study to determine its acceptability.
- 12. Section 4.12, Subsection 4.12.1.4.4, p. 4-67: It is our understanding that new boilers have been installed recently in individual buildings on Main Post, and that the older boiler plant, Building 1220, has been decommissioned. This information is contradictory to the referenced subsection.

Very truly yours,

Frank C. Cosentino Executive Director

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