



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

December 19, 1996

Mr. Joe Hand  
U.S. Army Corps of Engineers  
Mobile District Office  
P.O. Box 2288  
Mobile, AL 36628-0001

Re: Proposed Disposal of Stratford Army Engine Plant Property  
Stratford, Connecticut

Dear Mr. Hand:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency submits the following comments as part of the NEPA scoping process for the Army's disposal of the Stratford Army Engine Plant (SAEP). EPA is pleased to participate in this evaluation of alternatives for reuse of the Stratford plant. We are available to meet with you and provide access to technical expertise in the agency if you wish.

Because we have not received a detailed description of the proposed action and its potential impacts, we cannot provide detailed comments at this time. We would propose that the Army develop and circulate for review a draft scope of work for the EIS. At that time, EPA could provide more meaningful comments on the range of options and the analysis of impacts.

Based on information we have reviewed, however, including the July 1996 Draft Final Baseline Environmental Survey, we have the following concerns which should be addressed in the EIS:

Analysis of Impacts

The reuse of the Stratford Army Engine Plant could potentially cause significant direct, indirect and cumulative impacts which should be thoroughly evaluated in the EIS. These areas include water quality (surface and groundwater), wetlands, hazardous wastes, air quality and noise.

With regard to water resources, we understand that the SAEP facility includes 50 acres of intertidal flats along the Housatonic River. Nearby freshwater resources include Frash Pond and wetland abutting the property to the north. Short Beach is one mile south of the property. Large tidal marshes nearby,



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including the Great Meadow Salt Marsh, Nell's Island and land around Sikorsky airport, provide habitat for aquatic life, shellfish and other wildlife. The piping plover occurs in the vicinity of the facility and nests on Short Beach.

The EIS should fully evaluate any direct, indirect or cumulative impacts that the proposed reuse of the SAEP property may have on these resources. "Impacts" include ecological, aesthetic, historical, cultural, economic or health impacts, whether direct, indirect or cumulative. With regard to indirect impacts, CEQ regulations require that the analysis include changes in the patterns of land use, population density, or growth rate. Cumulative impacts include "the impact on the environment which result from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7

#### Existing Contamination

The EIS should include a full characterization of the extent and nature of contamination caused by past use of hazardous substances at the Stratford facility. The July 1996 Draft Final Baseline Environmental Survey (BES) indicates approximately 33 areas have been designated for investigation and/or cleanup at the Army Engine Plant. These sites are at locations that directly and indirectly affect significant environmental resources, such as intertidal zones, wetlands, surface waters and groundwater. In particular, the BES indicates that for 31 of the 33 areas, the BES concluded either that remedial action was necessary to address contamination, or that additional evaluation was required to determine the need for remedial action.

The ongoing cleanup process will contribute significant information that bears upon the future land use of the base. The reuse options evaluated in the EIS must consider the need for and impacts of remediation as well as impacts from the ultimate reuse. The options evaluated should consider the short term impacts of remediation -- for example, the construction and use of various treatment processes on-site, traffic impacts and noise.

#### Alternatives Analysis

We understand that the Army intends to analyze various reuse alternatives according to generic categories that will include "medium-low," "medium" and "medium-high" intensity reuse options. EPA's experience with the review of previous Department of Defense facility closures is that a generic approach defers treatment to a later permitting or review stage, based on the

presumption that future developers will be responsible for meeting permitting requirements. However, we believe that this approach does not fulfill the requirement under NEPA that the federal agencies use all practicable means to avoid or minimize any possible adverse effects of their actions on the quality of the human environment. 40 C.F.R. § 1502.2.

Accordingly, we recommend that the Army provide as much detail as possible regarding the reasonably foreseeable reuse options for the SAEP property, including possible "low" and "high" density uses. Any information that may be available, including proposals of potential developers and the reuse plans of the citizen advisory committees and local redevelopment authorities, should be evaluated in the EIS.

#### Wetlands

The EIS should include a detailed description of wetlands at the SAEP facility, including the intertidal zone, and their functions and values. We recommend that you consult with EPA's wetlands staff as to the methodology that is most appropriate in characterizing the existing wetlands resources. The EIS should indicate whether any alternatives will involve the placing of fill material in wetlands or other waters of the United States that will be subject to the requirements of Section 404 of the Clean Water Act.

Where proposed reuse options would transfer development rights to non-federal public or private parties, Executive Order 11990 for the Protection of Wetlands imposes special obligations to avoid the loss of wetlands to the extent possible. Under this Executive Order, when federally owned wetlands are proposed for lease, easement, right-of-way or disposal to non-federal public or private parties, the federal agency must: (a) reference in the conveyance those uses that are restricted under federal, state or local wetlands regulations; (b) attach other appropriate restrictions to the uses of properties by the grantee or purchaser and any successor, except where prohibited by law; or (c) withhold such properties from disposal. These opportunities should be evaluated in the EIS.

#### Air Quality

With regard to air quality issues, the EIS should describe background air quality conditions in the project area, as well as the effect that activities at SAEP have had on these conditions, and compare these findings to the potential air quality impacts of reuse options. As noted in the BES, the SAEP is in a serious non-attainment area for ozone and a moderate nonattainment area for carbon monoxide. We recommend that the Army contact our air quality staff, to whom we will be happy to direct you, regarding the appropriate methodology and level of detail for this

analysis.

Thank you for this opportunity to provide scoping comments on the reuse of the Stratford Army Engine Plant. If you have any questions or wish to discuss these comments, please call me at (617) 565-3422 or Margery Adams at (617) 565-3746.

Sincerely,



Elizabeth Higgins  
Chief, Office of Environmental Review