TOWN OF STRATFORD

Department of Community/Economic Development

Office of Project Coordinator – Stratford Army Engine Plant LRA

2725 Main Street, Room 1, Stratford, CT 06615

203-381-2045

Fax: 203-381-6940

October 24, 2000

Mr. John Burleson, Base Environmental Coordinator Stratford Army Engine Plant 550 Main Street Stratford, CT 06615

Dear Mr. Burleson:

Enclosed are comments prepared after my review of the Final Engineering Evaluation/Cost Analysis (EE/CA) for the Causeway and Dike at the Stratford Army Engine Plant.

In addition to the human health and the environmental issues, which are addressed in the EE/CA, the LRA is still very interested in its ability to use the Causeway and Dike for the purposes described in the 1997 Redevelopment Plan and the EDC Application. The product of the EE/CA, therefore, is critical to the LRA's plans for its intended use, which is open green space for passive recreation.

Should you have any questions regarding the intended use of the causeway dike, or questions related to the attached comments please contact me at 203-381-2045. I look forward to coordinating the LRA plans for reuse with your remediation plans for the causeway and dike as the design process proceeds.

Sincerely, yours,

Rick J. Norkis

Project Coordinator SAEP LRA

RJN/pb Enclosure

cc: Mark Barnhart, Town Manager

Diane Toolan, Director, Community/Economic Development

Pete Szymanski, Installation Manager, SAEP

Fred Hyatt, BTC, SAEP

Richard Buturla, Assistant Town Attorney Robert Kaspari, CBRACO, TACOM

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Comments on the Final EE/CA for the Causeway and Dike

- 1. Page. ES-1, Para. 1, states that "the Draft RI Report is scheduled to be submitted in the summer of 2000". What is the status of the report and when will it be available to the LRA for review?
- 2. Pg. ES-1, Para. 3. The SAEP is in an MA (light industrial) zone.
- 3. Pg. ES-2, Para. 4. Same comment as number 1 regarding the RI report.
- 4. Pg. ES-3, Para. 1. The second sentence states, "exceedances were detected in three isolated hand auger explorations on the south face and edge of the Dike". It goes on to say, that because these locations are not within the dike they will be addressed by the Feasibility Study. When will the Feasibility Study be available for review by the LRA? Lack of characterization of these areas could cause problems with open space design.
- 5. Pg. 2-1, Section 2.1.2, Para. 1. The SAEP is in an MA (light industrial) zone.
- 6. <u>Pg. 2-4, Sect. 2.1.4.1</u>. Introductory paragraph lists peat as a character of the shallow geology of the SAEP, but the following paragraphs do not describe its relevance to the geology.
- 7. Pg. 2-4, Sect. 2.1.4. The RAB was informed of a differential settling problem on the causeway, but the concern was neither identified nor described in this section.
- 8. <u>Pg. 2-11, Sect. 2.4</u>. The paragraph states "CTDEP has established RSR criteria for various media, including target concentrations for indoor air..." When asked for the criteria by the RAB, it is not available. Does such a criteria exist; if so, and what is it?
- 9. <u>Pg. 3-1, Sect. 3.0, Para. 2</u>. On what basis was the causeway and dike area considered a non-critical removal action?
- 10. <u>Pg. 3-2</u>, <u>Sect. 3.2</u>. Implementation of the Causeway and Dike NCRA was, "anticipated to begin in late summer or fall of 2000". What is the new anticipated start date, and what is the schedule to reach that point?
- 11. Pg. 4-18, Para. 3, states that the "erosion control cover system would consist of riprap armor over the entire Causeway surface; however, with a smaller size material used on the top center portion..." The proposed causeway cover suggested here does not appear to be compatible with page 2-3, "Future Land Use", which states, "The approximately 16 acres of proposed park land (i.e., recreational area) would include a landscaped park with pathways for pedestrians and bicyclists..." The Town's intended land use for the causeway, which has

- remained unchanged since submission of the 19987 Redevelopment Plan, has been to use it as green open space.
- 12. <u>Pg. 4-18</u>, <u>Para 6</u>, discussed "a notice of intent to record an environmental land use restrictions". What are these land use restrictions, and when will they be defined?
- 13. <u>Pg. 4-22</u>, <u>Assumption 2</u>. How will disturbance of the tidal flats be minimized if a portable dam is not placed around the causeway during construction?
- 14. <u>Pg. 4-22</u>, <u>Assumption 6</u>. Geotechnical investigation and evaluation for settlement, slope, and global stability is planned during predesign of the causeway remediation plan. When will this information be available to the LRA for review?
- 15. <u>Pg. 6-1, Para. 4</u>. This paragraph states that all material, equipment, and services are readily available to complete Alternative 1, and it would take approximately seven (7) months to complete. Is the same true for Alternative 4? When will consistency with the RI and Feasibility Study be determined for Alternative 4?

16. General Comments.

- a. The Town wants the causeway to provide access to deeper water at its end. Can sheet pilings be installed at the end off the causeway as part of its remediation?
- b. The Causeway was always envisioned as open green space, which would provide opportunities for passive recreations. The current design would limit the site's usefulness and cause difficulty, particularly, for the Town's handicapped residents to use the causeway.

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