

Mr. Peter Szymanski
SAEP Installation Manager
Stratford Army Engine Plant
550 Main Street
Stratford, Connecticut 06615

03 January 2003

Subject: **Public Comments on FOSL**

1. PURPOSE

In response to the Army's solicitation for regulatory/public comments on the Finding of Suitability to Lease (FOSL), dated 21 November 2002, documenting the *environmental suitability* of the Stratford Army Engine Plant, Stratford, CT for leasing to the Town of Stratford consistent with United States Department of Defense (DOD) and Army policy, I offer my written public comments. These comments parallel the paragraph order of this FOSL. Is the Occupancy Plan submitted by the Town of Stratford a Business Plan that *integrates* light industrial/commercial activity with the coastal environment of this installation? Is residential activity of this coastal installation an eventual leasing option? If not, why not?

2. PROPERTY DESCRIPTION

The FOSL states that the property to be leased consists of approximately 78 acres of land and improvements. But omits description of the site's *environmentally sensitive coastal location on the Housatonic River*. A site map of the property, Enclosure (1), shows dike riprap protecting the property from high tides, and the causeway extending into the tidal flats of the Housatonic River.

3. ENVIRONMENTAL CONDITION OF THE PROPERTY

The environmental condition of the property is hazardous to human health and the environment. It has been for decades. *Site wide soil contamination and site wide groundwater contamination* have been under investigation/remediation since 1998. Significant groundwater contamination encompasses an area of approximately 40 to 50 acres of the property. That is 52% to 64% of 78 acres. There is at least one other hazard to human health and the environment-*indoor air quality*. Occupancy of buildings may require indoor air sampling as part of the environmental conditions and restrictions within the lease. *What percentage* of the 78 acres of land is environmentally suitable for leasing at this time? Is the percentage less than 10% or 20%?

4. FUTURE REMEDIATION ACTIVITIES

There are no environmental remediation orders or agreements applicable to the property under consideration for lease. The *Remediation Investigation/Feasibility Study (RI/FS)* is not complete. A *Draft* Final RI Report, providing the nature and extent of contamination at the site, was planned for submittal to CTDEP and EPA in December 2002. An ongoing *Remediation Plan* is to be submitted after a *Final* RI Report is reviewed. Time is of the essence. It is suggested that the *Final Remediation Plan*

consider the demolition of buildings and capping of land, as compared to restoration of buildings, in any analysis of costs versus benefits.

5. ADJACENT HAZARDOUS CONDITIONS

There are no known hazardous conditions at adjacent properties that render the property unsuitable for lease. However, the potential migration of groundwater contamination into the adjacent Peck's Pond and tidal flats of The Housatonic River justify further investigation/remediation to ensure protection of human health and the environment.

6. REGULATORY/PUBLIC COORDINATION

Regulatory/public comments are being solicited on this FOSL and will be addressed/incorporated as determined by the Army. A copy of the regulatory/public comments will be provided in Enclosures 7 & 8. When? To enhance community relations with the people of the Town of Stratford, does the *Army's new Installation Management* intend to reinstate the monthly meetings of the Restoration Advisory Board? When?

7. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE AND CONSISTENCY WITH LOCAL REUSE PLAN

Is the indoor air quality hazardous to the activities anticipated under the proposed (limited) lease? What is the date of preparation of the Local Reuse Authority Reuse Plan?

8. ENVIRONMENTAL PROTECTION PROVISIONS

Defer to the solicited regulatory comments.

9. FINDING OF SUITABILITY TO LEASE

As of 03 January 2003, *less than an estimated 20% of the property is suitable for lease* for the intended purpose. The uses contemplated for this very limited lease are consistent with the protection of human life and the environment. I believe the Army's Installation Management has an obligation to make this consistency more transparent to the public. The public of the Town of Stratford are pleased that U.S. Army Major General, Larry J. Lust, GS Assistant Chief of Staff for Installation Management, confirms that there are adequate assurances that the United States will take any additional remedial action found to be necessary that has not been taken on the date of the lease. With respect General, as soon as your schedule and priorities allow, please perform a *personal fact-finding at this installation to estimate the cost and time to completion for remediation of site wide soil contamination, groundwater contamination, and indoor air quality*. I am confident that my State of Connecticut's Congressional Senators and Representatives in Washington, D.C. will be supportive of your assessment of and appropriation authorization for this U.S Army Installation. The Army closed this installation in 1998. The Army owns this contaminated installation. The Army is required by regulation to clean up this installation. Can the Army clean up this installation by 2008? I believe the Army can and will!

Redacted - Privacy Act