



State of New Jersey

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MARK N. MAURIELLO
Acting Commissioner

July 16, 2009

Barbara A. Folk
Public Affairs Office - EA Comments
IMNE-MON-PA, Bldg. 1207, Room G-07
Ft. Monmouth, NJ 07703

RE: Final Environmental Assessment of the Implementation of Base Realignment and Closure at Fort Monmouth, New Jersey

Dear Ms. Folk,

The New Jersey Department of Environmental Protection (NJDEP) has completed its review of the Final Environmental Assessment (FEA) for the Implementation of Base Realignment and Closure at Fort Monmouth, New Jersey. We offer the following comments.

COMMENTS

SITE REMEDIATION

The following are comments on the EA by the NJDEP's Bureau of Design and Construction:

1. Section 4.13.1.3, Environmental Cleanup – Installation Restoration Program. This section should discuss the 9 existing landfills at Fort Monmouth (8 on Main Post, 1 on Charles Wood), as they stand out in significance in considering the future use of IRP sites. All of the landfills contain low-level contaminants in soil and all have caused low-level ground water contamination. Most importantly, the surface soils at all 9 landfills have contamination in excess of New Jersey's residential Soil Remediation Standards, and pose a direct-contact threat to humans. According to Section 2.3.2 of the EA, Cleanup of Contaminated Sites, the Army will take all necessary remedial actions prior to transfer of property. Therefore, remedial action to address the direct contact threat at the landfills will be necessary before the landfill parcels are transferred. Fort Monmouth has proposed the placement of one additional foot of soil cover on all landfill surfaces to address the direct-contact threat. Measures to restrict physical access, such as fencing, may also be required prior to transfer. The Fort Monmouth Economic Redevelopment Planning Authority (FMERPA) reuse plan calls for the landfills to be designated as passive open space.

2. Section 4.13.1.4, Military Munitions Response Program. The first sentence of this section states "there are 16 active ranges at Fort Monmouth" and the first 3 sentences repeatedly use the word "range" or "ranges". It would be better to use the term "gun range" or "firing range", to distinguish between gun ranges and bombing ranges.
3. Section 4.13.1.5, Petroleum and Petroleum Products. This section should state that environmental investigation and/or cleanup activities are ongoing at 12 current or former petroleum storage locations (Buildings 699, 290, 296, 80/166, 108, 1122, 283, 812, 886, 2567, and 800 Area USTs #9 and #12).

CULTURAL RESOURCES

The NJDEP's Historic Preservation Office has been involved in ongoing Section 106 consultation with the Department of the Army, Fort Monmouth Economic Revitalization Planning Authority (FMERPA), and other consulting and interested parties, in order to finalize a Programmatic Agreement for the treatment of cultural resources impacted by the Base Realignment and Closure (BRAC) of Fort Monmouth.

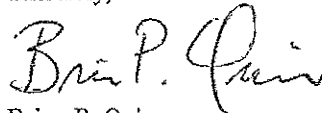
As discussed in the submitted FEA, the Programmatic Agreement currently in development will be the guiding document for this undertaking pertaining to cultural resources (identification of historic properties, effects determinations, and stipulated treatments/mitigation measures.) It should be noted that cultural resource related consultation has occurred since March 2009 (date of the EA), which has modified some of the information contained within the submitted document.

LAND USE REGULATION

The NJDEP's Land Use Regulation Program's (LURP) review of the FEA is still pending. Comments on Land Use issues for the BRAC closure of Ft. Monmouth will be sent in addendum to the comments presented in this letter once the LURP review is complete.

Thank you for giving the New Jersey Department of Environmental Protection the opportunity to comment on the FEA.

Sincerely,



Brian P. Quinn
Principal Environmental Specialist
Office of Permit Coordination
and Environmental Review

C: Larry Quinn, NJDEP
Jonathan Kinney, NJDEP
Rich Langbein, NJDEP