



NEW JERSEY  
ENVIRONMENTAL FEDERATION

Fort Monmouth Earth Renaissance Peace Alliance (FMERPA)

January 26, 2010

The Honorable Frank Lautenberg  
One Gateway Center  
Twenty-Third Floor  
Newark, NJ 07102

The Honorable Robert Menendez  
One Gateway Center  
Suite 1100  
Newark, NJ 07102

The Honorable Rush Holt  
District Office  
50 Washington Road  
West Windsor, NJ 08550

The Honorable Frank Pallone  
District Office  
504 Broadway  
Long Branch, NJ 07740

**RE: Environmental Concerns at Fort Monmouth Military Base**

Dear Senator Lautenberg, Senator Menendez, Representative Holt, and Representative Pallone:

The closure of Fort Monmouth, planned for September 15, 2011 under the national 2005 Base Realignment and Closure process, is approaching. We are writing to you to stress that several serious environmental concerns remain about this federal property; and it is unclear if they will indeed be addressed prior to transfer. The New Jersey Friends of Clearwater, New Jersey Environmental Federation, Fort Monmouth Earth Renaissance Peace Alliance, and Clean Ocean Action are writing to ask for your assistance in addressing these serious environmental and public concerns.

Last May, we and others (Birdsall Engineering and Eatontown, Tinton Falls, Monmouth County Board of Health, New Jersey Department of Environmental Protection (NJDEP), and members of the public) submitted comments on the Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI). These comments are online at: <http://www.monmouth.army.mil/C4ISR/brac/ea/ea.shtml>. We found the EA and draft FONSI of Fort Monmouth to be grossly inadequate. We concluded that

key issues still need to be addressed and that an Environmental Impact Statement (EIS) is warranted. An EIS is required when there is a “significant impact” to the environment. At the October 2009 Environmental Advisory Committee meeting of the Fort Monmouth Economic Revitalization Planning Authority (FMERPA), the surrounding towns, Eatontown, Oceanport, and Tinton Falls, also raised serious concerns, rejected the EA and draft FONSI, and requested an EIS. It is believed that an EIS would provide a more focused, detailed, and comprehensive review of the Fort Monmouth’s impacts to the property and surrounding waterways.

### **Deficiencies in the EA and draft Finding of No Significant Impact**

We find that the draft FONSI, based on this deficient EA, was issued at least prematurely. Critical problems include the following:

1. the EA did not provide sufficient evidence to support its findings as required;
2. the EA did not evaluate all available studies, such as a 428-page Phase 2 Environmental Condition of Property Assessment (ECP) which indicated additional significant problems; and
3. both the EA and draft FONSI were issued prior to the completion of several important environmental investigations, such as Baseline Ecological Evaluations (BEE), which were determined to be needed by the Army’s consultant.

### **Marine Pollution Issues**

There are several concerns regarding Fort Monmouth’s effects on the marine environment that are unaddressed:

1. Based on the Phase 2 ECP assessment (again which the EA omitted), Baseline Ecological Evaluations (BEE) were recommended at 27 additional contaminated parcels. However, the workplan for this investigation, let alone the study, has not even been completed and remains to be approved and funded.
2. At this time, only limited testing has been done to evaluate the historical and ongoing impacts of several landfills located along streambanks, past sewer treatment plants, or other activities at Fort Monmouth to the downstream waters and sediments. Contaminated sediments may impact and impair marine life through exposure due to organisms digging and living in the sediments and due to resuspension events resulting from high winds or other disturbances. As the BEE are designed for specific sites only, it seems very unlikely that these efforts will fully assess all the effects of Fort Monmouth on the marine environment.
3. The Army does not plan to excavate any of the contents of the landfills despite descriptions of hazardous contents, lack of containment lining, and close proximity to creeks. There are plans to cap the landfills but funding has not been secured; whether capping will occur and be adequate to contain contamination is uncertain. We call for further investigation by the same means as the earlier Phase 2 ECP discoveries, industrial metal detection and ground penetrating radar surveys to discover if there are any underground storage tanks and 55 gallon drums buried in the landfills.
4. Groundwater contamination, which can transport contaminants to marine waters, continues to exceed state standards at several monitoring stations and is projected to exceed standards well into the future at some of the Classification Exception Sites.
5. Reports from 2007 and 2008 indicated that more surveys were needed to characterize the extent of radioactive contamination. The EA did not include any reference to these additional investigations.
6. The wastewater system study results were released after the EA was finalized. Cracks, root intrusion, and corrosion were identified as problems in parts of the old infrastructure.
7. There are plans to study the stormwater system which the EA indicated was old and in need of repair, but it is unclear if this study will happen.

### **Non-marine Environmental Issues**

Some of the above issues have non-marine related implications as well. These are in addition to other non-marine environmental concerns. The following highlights some of the non-marine issues:

1. The extent of radioactive contamination also needs further investigation on land. There are plans to conduct surveys once buildings are no longer occupied.
2. Some of the landfill sites may be designated for open space. However, deed restrictions may prohibit access to these areas with fencing or other means.
3. After the property transfer, groundwater monitoring if still necessary will have to be paid for by the new owner. Based on existing modeling results, monitoring may be required from a few years to up to 4,500 years before compliance is obtained at all sites.
4. While extensive data is available for land areas of Fort Monmouth and areas with “Contaminants of Concern” above applicable criteria have been identified, it is difficult to determine the location and extent of land areas that do not exceed non-residential standards yet do exceed the residential soil standards. Identification of these areas is needed, notably for areas designated for residential use.

The Army has stated in the EA that they prefer to sell or lease the land before all clean-up, or remediation, is completed. However, if contamination and infrastructure conditions are not fully assessed and communicated in an understandable manner, potential buyers or recipients may not know the total remediation costs and some of the economic and environmental burden may fall on the public.

### **Transparency and Public Participation**

Transparency and public participation are essential to the base closure process. The US Army has made extensive data available and has held many meetings open to the public. However, it is also important to note that the Army initially rejected our requests to make the public comments submitted on the EA available to the Fort Monmouth Economic Revitalization Planning Authority (FMERPA) Environmental Advisory Committee (EAC) and the Army’s Restoration Advisory Board (RAB) as well as us. After we submitted a Freedom of Information Act request and spent time pursuing the matter, the Army did send us the comments and posted them on the Fort Monmouth website.

The BEE workplan is not available for public review until after the workplan is approved by the state. The BEE workplan is not subject to public comment or input. It is uncertain if the BEE workplan and its scope will be adequate.

### **Needed Actions**

We urge you, as our congressional leaders, to ensure that the following actions occur in a timely manner prior to property transfer:

- 1) Assessment of all impacts that Fort Monmouth has had on the area and waterways through an EIS, which would include further investigation that will:
  - complete the Baseline Ecological Evaluations, including more aggressive investigation of continued high levels of contamination,
  - determine the full extent of radioactive contamination,
  - identify and determine the extent of leaks in the wastewater system to the environment,
  - examine the stormwater system as planned,

- identify areas with residential soil standards exceedances, and
  - assess the extent and depth of sediment contamination (a sediment core sampling survey is necessary), as well as their existing and potential effects on marine life.
- 2) Remediation of the landfills, including the possible need for excavation of contents based on the results from groundwater testing, the Baseline Ecological Evaluations, and surveys for underground tanks or drums
  - 3) Full public disclosure of contamination and infrastructure conditions, deed restriction requirements, as well as expected remediation requirements with specific timeframes

In conclusion, it is not our intent to slow or delay the closure process. Our goal is to ensure appropriate actions are taken that provide for a clean and healthy future of Fort Monmouth and surrounding areas. We would appreciate the opportunity to meet with you.

Please contact Heather Saffert at 732-872-0111 or email [science@cleanoceanaction.org](mailto:science@cleanoceanaction.org) to suggest convenient meeting dates and location. Thank you in advance for your prompt attention to our concerns. We look forward to meeting with you in the near future.

Sincerely,



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Staff Scientist  
Clean Ocean Action



Ed Dlugosz  
President  
New Jersey Friends of Clearwater

Ben Forest  
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