



## Draft Environmental Impact Statement "Cliff's Notes"

*The following comments address key sections of the Navy's 400-page Draft Environmental Impact Statement (D-EIS). Note that many important issues and statements have been buried deep within the report or omitted completely.*

### Laurelwood Is NOT "Affordable Housing"

- **4.2.1.1:** Laurelwood Homes LLC. expects to get \$1,590-\$2,145 per month and will refurbish each prior to rental. *"Exterior refurbishments would include new siding, roofing, landscaping, and street and sidewalk paving. Interior refurbishments would include new kitchens and bathrooms as well as new carpets, flooring and paint."* The rates evidently are based on comparable rentals at Avalon apartments in Freehold. **The D-EIS reiterates Earle's mission on ES-1: "providing ammunition to the Fleet."**
- **6.1.2.1:** The D-EIS validates what we've said all along - that the Laurelwood homes will go to market well above affordable housing rents.
- It is not stated anywhere in this document how Laurelwood is part of the mission.

### "Earle Security" and "Mission Capabilities" are No. 3 and 4 on list of Criterion; *Not* 1 and 2

- Table 2-3; pg. 2-5: The D-EIS is putting 1. "meets the contractual obligation of the lease agreement between the Navy and the developer" and 2. "tenable and safe access to adjacent public roads" **ahead of security and the base's mission** on the list of criterion for going thru w/this contract. Is the perceived \$3.5 million annual savings is the only reason to go thru w/this deal?

### The Draft EIS does not include a security impact assessment

- **4.13.1.1:** "Because the 2003 Security Impact Study did not evaluate all of the alternatives considered in this D-EIS, the Navy has requested an updated Security Impact Study through the Naval Facilities Engineering Service Center. The findings and conclusions of the new study will be incorporated into the final EIS for consideration by the decision maker."

### Laurelwood residents *will* commingle w/Stark Road and other military residents @ Earle

- **4.1.1.1. Road "alignments"** 1 thru 3 would block off military families living on Stark Road, etc. from direct access to the base as well. In essence, their houses, much like Laurelwood, would be segregated from Earle by fencing, requiring active military personnel and their families to exit the civilian "unimpeded access" gate to re-enter main gate NWS Earle to use the "military-only" facilities; (...so what we have, in essence, is a new, impeded access to the base for military and contractors living in base housing, all for the sake of unimpeded access for civilians to 300 Laurelwood homes)



- **4.1.1.2 Alignment 4**, appears to cut thru the middle of the base and would incur the greatest road-building expense (upwards of \$11 million), but be the only totally segregated entrance to Laurelwood

### Other Sections of Interest:

- **2.4.1.5: The buyout or lease termination** options "fail to satisfy the contractual obligations under the lease agreement...neither buying out the Developer nor terminating pursuant to the National Emergency clause would meet the purpose and need for the proposed action, and as such these are not reasonable alternatives for the stated purpose and need
- **3.1.1.1:** Evidently, the Navy is demolishing two-thirds of Stark Road housing by the end of 2008 - "economies of scale" (while you're in there knocking down other unused homes, wouldn't it make sense to take the wrecking ball to Laurelwood and put an end to this nonsense?)
- **3.3.2: Law Enforcement** - Earle police will oversee Laurelwood, and matters will be handled in federal courts
- **3.4.4: Potable Water** - "**trihalomethane**" levels in the water supply exceeds regulatory levels
- **3.11.2: Groundwater contamination** (but not in drinking water) in the "region of interest" (ROI)
- **3.12.1.1: Asbestos, lead-based paint** and **PCBs** appear to *not* be an issue, (a request for a more-recent test than 2003's for PCB exposure) (i.e. similar to Taku Gardens housing at Ft. Wainwright in Alaska)
- **3.12.2.1: Arsenic** has been detected at concentration above the NJDEP residential direct contact cleanup criteria in subsurface soil; the DEP/EPA would need to "specifically word" documents in the event that the developer would want to sell Laurelwood
- **3.12.5: Environmental Justice/Protection of Children:** Laurelwood will be considered "low-income housing" by virtue of the relative wealth of the surrounding community and for no other reason. (it is unclear how putting kids within reach of arsenic is not an environmental and safety risk, as discussed in 3.12.5.3).
- **3.13.2.1: Explosives storage:** D-EIS cites nothing other than DoD Manual 5100.76-M, "Physical Security of Sensitive Conventional AA&E" for how Earle will control and store ammunition and explosives, (all concerned residents should have access to this document)
- **4.3.2.1: "Law enforcement** would alter manpower and equipment levels as necessary to continue to provide existing levels of service at the station." 4.3.3.1 suggests Earle could approach Colts Neck to cover emergency services. Which is it?
- **4.5.1: Roads** - 7.7% projected increase in traffic volume along the entrance roads (NOTE: How much will it cost to widen areas near Rt. 18 as a result of any overflow of "new" Laurelwood traffic?)



## Neighbors Opposed to Privatization at Earle

[www.orgsites.com/nj/nope](http://www.orgsites.com/nj/nope)

- **4.13.1.2 - A feasible comparison** of civilian housing at Earle w/that at Ft. Wainwright; one - a 60-minute drive to NYC and the site of the WTC attacks, versus the Arctic and a 60-minute drive to the North Pole...though in section 4.13-2, the D-EIS says "Laurelwood housing area would have a degree of Navy security personnel presence not associated with other contiguous civilian housing" (i.e., Earle presents a unique case)
- **4.13.4: FOUR SECURITY MEASURES:** 1. Perimeter fencing; 2. "Clear zones (i.e. shoulders of new roads, additional 30 feet inside the fence line); 3. Additional security patrols; 4. Routine security patrols of Laurelwood housing
- **5.2.2.4: Reduction in NWS Earle housing:** The Navy is demolishing 140 Stark Road, Green Drive and Green Acres homes for active military and renovating the remaining "end state" 89 units that will continue to house the force.
- **5.11.2: "Relevant Past and Present Actions"** only cites 9/11 and Fort Dix as recent terror threats; nothing of course about the cyber attack on Earle in 2001 or the failed safety drills in 2007.