



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

October 16, 2018

Planning Division
Evaluation Branch

SUBJECT: Request for Concurrence on Determination of Effect for Planned Activities on Gould Island, Narragansett Bay, Jamestown, RI

Mr. J. Paul Loether, Executive Director and SHPO
Rhode Island Historical Preservation & Heritage Commission (RIHPHC)
Old State House, 150 Benefit Street
Providence, RI 02903

ATTN: Mr. Glenn Modica, Project Review

Dear Mr. Loether:

The U.S. Army Corps of Engineers, New England District (USACE-NAE) is currently scoping work for additional remediation activities on Gould Island as part of the Department of Defense Formerly Used Defense Site (FUDS) program. USACE-NAE requests that RIHPHC review the proposed scope of work and provide concurrence or comment in accordance with Section 106 of the National Historic Preservation Act (NHPA).

Extensive sampling work was conducted at the island in 2017 in response to the Remedial Investigation of the Former Torpedo Testing Facility. These activities involved ground-disturbance but did not impact existing buildings and site features. The RIHPHC provided a letter dated 29 September 2017 concluding that no historic properties will be affected by the project and therefore there were no objections. This letter is provided as Enclosure 1.

The USACE-NAE plans to conduct additional activities on Gould Island in response to data gaps that were identified as a result of the initial sampling work. The proposed work will have the added effect of addressing requests made in a letter from the Rhode Island Department of Environmental Protection (RIDEM), dated 13 September 2018, expressing a desire for the USACE to consider removal of various structures, including those discussed below. This letter is provided as Enclosure 2.

The proposed additional work includes demolition, removal of debris, and removal of an underground storage tank (UST). This effort is being conducted under USACE-NAE's current scope and authority;

The planned scope of work includes:

1. Improvements to site accessibility, which may include construction of temporary roads to allow equipment access.
2. Demolition of the boiler house structure and removal of all associated debris (NED Site 35). This structure is collapsed and poses a safety hazard to site characterization work in and near the structure. It is believed that the structure has asbestos containing material (ACM) in the form of transite paneling or similar material. The foundation, below-grade utilities, and boiler house stack will not be removed.
3. Removal of debris from two bunkers (NED Sites 21 and 22). These bunkers were used for solid debris disposal prior to the site being obtained by Rhode Island. The roof structure of both bunkers has collapsed and the both bunkers are now heavily vegetated, creating a safety hazard to site characterization work in and near the bunkers. The bunker structure, especially the east facing walls, will not be removed but may require structural bracing. The foundation, below-grade utilities, and bunker structure will not be removed.
4. Removal of a single UST near the maintenance building (NED Site 12). The UST is believed to be smaller than 2,500 gallons.

In addition to the planned scope of work, the USACE-NAE will retain the ability to exercise the following options if required:

1. Removal and disposal of the boiler house stack. This action will be implemented only if a structural analysis determines the stack poses a safety risk.
2. Removal of other debris associated with the above mentioned sites, but outside of the structure footprints. This could include debris removal required to gain access to the sites but will not include additional building or structure demolition.

A site map, photos, and notes are provided in Enclosure 3.

Due to the dilapidated and unsafe nature of the boiler house and two bunkers, and the risk to further site characterization work; there are no prudent and feasible alternatives to demolition of the boiler house and removal of debris from this structure and the two bunkers. The bunkers themselves will not be removed but are also in poor condition and a potential safety hazard. These remediation activities will assist RIDEM in any future expanded use of Gould Island for public recreation.

Therefore, USACE believes that the proposed activities listed above will have a "no adverse" effect upon significant historic properties in accordance with Section 106 of the NHPA and implementing regulations 36 CFR 800. We would appreciate your concurrence with this determination.

If you have any questions, please contact CPT Erik Patton, Geo-Environmental Branch at 978-318-8051 and erik.m.patton.cpt@usace.army.mil or Mr. Marc Paiva of the Evaluation Branch at 978-318-8796 and marcos.a.paiva@usace.army.mil.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence R. Oliver".

Lawrence R. Oliver
Chief, Evaluation Branch

Enclosures

cc: (with enclosures)
Mr. John Brown, Tribal Historic Preservation Officer
Narragansett Indian Tribe
4425 S. County Trail
Charlestown, Rhode Island 02813

cc: (without enclosures)
Mr. Andrew E. Nota, Town Administrator
Town of Jamestown
93 Narragansett Avenue, 2nd Floor
Jamestown, Rhode Island 02835

Mr. Nicholas Noons, Sanitary Engineer
RI Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908