



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

January 14, 2019

Engineering Division

Mr. Terrence Gray
Associate Director for Air, Waste & Compliance
Department of Environmental Management
235 Promenade Street
Providence, RI 02908

Dear Mr. Gray:

The U.S. Army Corps of Engineers, New England District (NAE) received your letter dated 13 September 2018 in which you outline Rhode Island's anticipated future use including limited tent camping and recreating on the State-owned portion of Gould Island. NAE continues working towards remediation on Gould Island and anticipates field activities this spring to remove debris piles preventing access to sampling locations. One additional round of contamination sampling is planned for before and after site access restrictions, in the spring and fall of 2019, with the intent of completing a CERCLA remedial investigation.

In order to ensure the project is completed in a time efficient manner while meeting RIDEM's intention of preserving bird nesting habitat, the New England District would like permission for limited, non-invasive access to Gould Island during the first two weeks of April and the first two weeks of August. Activities on the island would be limited to site visits and low-impact surface sampling that does not require motorized equipment. No heavy equipment would be used on the island during these four weeks.

As described in your September 13th letter, the NAE has included an anticipated future use of expanded public recreation, to include overnight camping, in our risk analysis. However, we request clarification on several points to ensure our risk assessment assumptions are in line with the expanded public recreation program planned by Rhode Island.

First, the NAE team would like clarification regarding the frequency of campsite and overnight visits anticipated for Gould Island. Given the summertime site restrictions in place to protect nesting birds, the NAE team intends to assume a single person would visit the island for no more than 30 days a year. This is approximately equal to spending every other weekend on the island (15 weekends total) for the entire time period the island is open to the public (33 weekends between August 16th and March 31st). This assumption is conservative, as enthusiasm for overnight tent camping on

Gould Island can be expected to be lowest during winter months when the site is open to public recreation. If RIDEM has information on usage frequency for similar island campgrounds in the Narragansett Bay, NAE will incorporate that information into our use assumptions.

Secondly, the NAE team intends to rule out the drinking of Gould Island groundwater as a possible contaminant expose pathway. The majority of wells installed on the island during remedial investigation show tidal influence and would potentially produce only limited yields of fresh water before saltwater intrusion rendered the produced water non-potable. Development of a drinking water system on the island would not be required in order to allow overnight tent camping on the island. USACE will assume that future recreational users will bring their own water supply when visiting on the island.

To facilitate efficient planning of March field work, the NAE team requests a reply by February 15, 2019. The point of contact for this letter is CPT Erik Patton, NAE GeoEnvironmental Branch, at 978-318-8051, and erik.m.patton.cpt@usace.army.mil.

Sincerely,



David I. Margolis, P.E., PMP
Chief, Engineering Division

cc:

Nicholas Noons, RIDEM (Office of Waste Management)
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