

September 27, 2024

Mr. Nick Noons
Rhode Island Department of Environmental Management
235 Promenade Street, Room 425
Providence, Rhode Island 02908

Subject:USACE Response to July 10, 2024, RIDEM Letter – Summary of planned changes, supporting
September 24, 2024, Response Letter

Gould Island FUDS Site, Jamestown, RI

Dear Mr. Noons,

We have prepared this detailed summary of our planned changes to the Gould Island Human Health Risk Assessment (HHRA) to support the September 24, 2024 letter sent by the US Army Corps of Engineers (USACE) to Mr. Terrence Gray (RIDEM), in response to RIDEM's letter to USACE dated July 10, 2024. Please review our planned changes, and let us know if you have any comments or questions by October 18, 2024, so we can complete the contract modifications necessary to complete this work.

After discussing this internally, the USACE agrees to update the draft HHRA to include an unrestricted recreational use scenario, as we have defined it below, by assuming that, with unrestricted access, an overnight camper and a park worker could spend a greater number of days on the island, as well as by adding consideration of a day-use recreator. These updates will be included as an Appendix to the HHRA.

Many of the areas of concern (termed New England Division [NED] Sites) have already been evaluated using the current draft HHRA assumptions as part of the Draft Remedial Investigation (RI). The results show, for most NED Sites, no estimated unacceptable risk to recreational users (assuming campers are at each individual NED Site for 30 days/year) or park workers (assuming 141 days/year at each individual NED Site), and it is expected that few, if any, additional NED Sites will result in unacceptable risks when an unrestricted recreational scenario is applied. Recognizing that the draft HHRA has already been completed, and based on what we know from those results, we do not believe it is necessary to recalculate risks at all NED Sites to achieve the objective of understanding whether unacceptable risks may exist for unrestricted recreational use. Rather, we will conduct a screening risk evaluation to estimate the potential risks for unrestricted recreational use for all NED Sites at Gould Island. If the screening risk evaluation indicates specific NED Sites could have unacceptable estimated risks (i.e., an estimated incremental cancer risk greater than $1E-4$ or a non-cancer HI >1), a full quantitative risk assessment will be completed for those NED Sites using the unrestricted recreational use scenario.

The unrestricted recreational use scenario will consider:

1. an overnight camper, assuming a greater number of days camping on the island,
2. a park worker, assuming a greater number of days working on the island, and
3. a day-use recreator.

The exposure assumptions for unrestricted recreational use are presented in the sections below.

Setting

Gould Island is currently designated by deed as a wildlife preserve with access to the island restricted during bird nesting season from April 1-August 15, and camping is currently prohibited on the island. The portion of the island accessible to visitors is the non-Navy owned area (39.15 acres).

The island is only accessible by boat and does not have a ferry service. Absent construction of a wharf or ferry terminal, it is reasonable to assume that recreational activity on the island would rely on access by owner/recreator vessels. Seasonally, this access would coincide with local area marina activity when boats are commissioned in the spring and decommissioned in the fall. This season typically spans early to mid-May through the end of October. While some recreational activity may extend outside of this period, especially for people who trailer and launch their own boats from public ramps or kayak to the island, it is expected that through and after November, and before April, little additional recreational activity will occur.

The island is relatively small, and the accessible (non-Navy owned) portion (39.15 acres) has a good network of walkable roads, although much of the island is currently heavily overgrown. The eastern and western shores have rocky shorelines that are walkable between low and high tides. The southern shoreline has a coarse sandy beach that is accessible at all tides which could be attractive as a location for swimming and a place to land small watercraft. Recreational users could include adults and children, and could be day-use recreators or overnight campers. Day-use recreators would not concentrate their activity at any specific NED Site and would divide their time across the entire island. Campers would anchor their location at a campsite and therefore could spend much of their time at a specific NED Site. In addition to these recreational users, another receptor could be a park worker who would walk the entire island during the day and the work week and be available to support recreational users for the duration of the season.

The concrete aviation pad on the southern end of the island is a focal point of waterfowl during nesting season. If, during the master planning process, this area was excluded from recreational activity for wildlife conservation, recreational access might still occur on the beach along southeastern shoreline at all tides and at the location of the former concrete/wood pier that was removed in 2021. All submerged navigational hazards have been removed from the former pier location and the landing there connects directly to the island road system.

Restricted Recreational Use Scenario and Unrestricted Recreational Use Scenario Assumptions

The current draft HHRA has a recreational use scenario that assumes camping at NED Site for 30 days/year over 26 years. This 30 days/year recreational exposure is consistent with the RIDEM letter to the USACE dated March 14, 2019, which concurred "an exposure frequency of 30 days per year is appropriate for a potential future recreational user on the island." The restricted recreational use exposure frequencies in the current HHRA are also consistent with the Site currently being designated by deed as a wildlife preserve with access to the island restricted during bird-nesting season from April 1-August 15. The 30-day camping recreational exposure corresponds to an individual camping on each of the approximate 15 weekends from mid-August through November. This equates to visiting and

camping at the same NED Site for 780 days, or a little more than two years, over a lifetime. This recreational use exposure scenario likely overestimates the potential risks posed at each NED Site.

Although camping is currently prohibited on the island, the recreational use scenario under the current draft HHRA does include camping. The current draft HHRA assumes camping would be allowed without restriction outside of bird-nesting season, including being free from any restrictions imposed by the Rhode Island State Parks Camping Policy (revised April 2023). However, we note that, in the interest of equitable reservations, the Camping Policy does restrict the frequency and duration a person or group may request a camping reservation at a designated camp Site. This results in a limit on the number of days a specific individual may camp at a particular park. Aside from the stated stay exemptions in the Camping Policy, the number of days an individual might camp depends on the number of available campsites, the number of days requested in each reservation, the number of parties requesting reservations, and the length of the camping season. Therefore, we assume that, even if Gould Island is open to unrestricted recreational use, the State of Rhode Island will designate a specific number of campsites and regulate reservations according to its policies. Due to the unique nature of remote island camping we believe the maximum stay exemption of “seven (7) nights total being allowed within any twenty-one (21) day period during the Peak Season (defined as the Thursday before Memorial Day Weekend in May through the Sunday of Labor Day weekend in September of each year,” (Rhode Island State Parks Camping Policy) as it is applied, for example, at the Charlestown Breachway and East Beach State Campgrounds, is likely most applicable and would be applied to Gould Island. Within the state park system, most long-duration campers use motorized recreational vehicles which would be expensive to transport to Gould. Therefore, it is assumed that camping at Gould Island would more likely be in tents. Campers would have to bring food for the entire camping duration or return to the mainland by boat and replenish supplies for longer camping stays. A maximum stay exemption of 7 days therefore seems reasonable for Gould for tent camping. If the maximum 7-day stay exemption is applied to Gould Island during peak season, the maximum time someone may reserve a campsite at the island would be 35 days during the peak season.

Thus, to consider unrestricted recreational use, the USACE will conduct a screening risk assessment by adding 5 additional days (for a total of 35 days/year) as a reasonable exposure duration assumption for unrestricted recreational use for campers at Gould Island.

Park Worker and Daytime Recreator Assumptions

The current draft HHRA exposure scenario also includes a year-round park worker spending 141 days/year (excluding the April 1-August 15 bird nesting season) over a 25-year period on the island. The 141-day park worker exposure duration represents the number of workdays (weekdays) between August 15 and March 31 minus personal time off for vacations and holidays (reasonably assuming 20 days). This is a conservative scenario, as it is uncertain whether or not a 5-day work week would be required for park workers in the off-season months (November-March).

Under an unrestricted recreational use scenario (that is, without bird nesting season restrictions), we assume a park worker will work 5 days/week from April-October (30 weeks) before, during, and after peak season (usually defined as Memorial Day through Labor Day) for a total of 150 working days. During the off-season (November-March, 22 weeks), a park worker would likely visit the island at most once per week, adding 22 days, for a total of 172 days. Assuming the same personal time off for vacations and holidays (20 days) as for the restricted scenario results in an exposure duration of 152

days. Conservatively, if we assume the unrestricted day-use recreator will visit the island no more frequently than 50% of the total number of days from April through October, or 76 days/year, this receptor would already be covered by evaluating the longer exposure duration park worker scenario and an additional assessment does not need to be conducted.

Thus, to consider unrestricted recreational use, the USACE will conduct a screening risk assessment by adding 11 additional days (for a total of 152 days/year) as a reasonable exposure duration assumption based on unrestricted recreational use at Gould Island.

It is assumed that these receptors could be exposed to surface soil at all NED Sites across the island and conservatively does not consider that only 12% of the FUDs area is impacted by a NED Site. The current draft HHRA found that the park worker scenario, using an exposure duration of 141 days, did not result in unacceptable risks. Using the same exposure assumptions, the conclusion would be the same for a daytime recreator who visits the island for an equivalent or lesser duration, therefore the daytime recreator scenario will not be quantified, but will be discussed in the HHRA Appendix.

Conclusions

Based on the exposure assumptions outlined above, the draft HHRA exposure durations for restricted and unrestricted recreational use will be:

Restricted and Unrestricted Exposure Durations			
Restricted	Park Worker	141	days/year
Unrestricted	Park Worker	152	days/year
Restricted	Overnight Camper	30	days/year
Unrestricted	Overnight Camper	35	days/year
Unrestricted	Daytime Recreator	76	days/year

Sincerely,

Rachel Leonardi

LEONARDI.RACHEL.MA
CPHEE.1612371551

Digitally signed by
LEONARDI.RACHEL.MACPHEE.1612371551
Date: 2024.09.27 15:16:11 -04'00'

Gould Island FUDS Project Manager

US Army Corps of Engineers