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Comment Centredale
Eugenia Marks to: Anna Krasko

02/21/2012 12:29 PM

From: "Eugenia Marks" <emarks@asri.org>
To: Anna Krasko/R1/USEPA/US@EPA
Please respond to <emarks@asri.org>

1 attachment



Restoration Comment EPA (2).doc

Dear Ms. Krasko:

Attached please find comments from Audubon Society of RI in response to "The Proposed Plan" for clean-up of the Centredale Manor superfund site, North Providence, RI.

Thank you and your staff for long years of work on this project. We look forward to continuing work to assure that this resource is restored for the health of humans and the environment.

I will send hard copy for record.

Eugenia Marks
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Audubon Society of Rhode Island

February 21, 2012

Anna Krasko, Superfund Project Manager
U. S. EPA Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re: Centredale Manor Restoration Project

Dear Ms. Krasko:

Although I have worked with the Woonasquatucket River Watershed Council to review this project, I am submitting the following comments on behalf of Audubon Society of Rhode Island.

Commenter Background: Audubon Society of RI is an independent state organization, established in 1898, with professional staff who operate in areas of conservation stewardship, advocacy, and education. Audubon manages wildlife refuges in 3 headwater streams of the Woonasquatucket in North Smithfield, Smithfield, and Glocester. Audubon routinely comments in the public interest on environmental projects. Eugenia Marks is ASRI Senior Director for Policy and holds a masters degree in Environmental Studies from Brown University. Her thesis focused on wetlands policy and she took field courses in wetland ecology. She has been a board member of the Woonasquatucket River Watershed Council, and her early interest in fish tissue contamination as a fate of water pollution led to her involvement in this river since the late 1980s.

Concurrence with WRWC comments on this project: I have walked the Oxbow and am familiar with the flood plain and channel of the river. The characterization of the topography, flood regimes, adjacent river channel, sampling the deposition of contaminants, and vegetation of the Oxbow requires more detail before an adequate restoration plan can be finalized.

- We believe that assumptions from aerial photos rather than ground-truthing form the basis of map 6 on page 17 of EPA's "Proposed Plan" (October 2011) showing river channel. Visits to the entry of the river into the northern end of Lyman Mill Pond seem to indicate that the channel of the river remains on the east side of the flood plain in a fairly straight path before the water column spreads out under a cover of *Decodon verticillatus* which map makers have interpreted as dry land. Google Earth map (May 2010) and the 1939 aerial from RIGIS show this as well.
- This area, shown in WRWC comments figure 2 lined in yellow, is without sampling.

(continued)

data, which may indicate the submerged, root-entangled nature of the sediment.

- This area outlined in yellow in WRWC comments may, due to its position at the entry to Lyman Mill Pond and with the stems of *Decodon* slowing flow and precipitating sediments, contain high concentrations of pollutants pertinent to this superfund site.

Comments on Cleanup Proposal: Audubon Society of RI generally concurs with EPA's proposed alternatives for Source Area Soil (4E), Groundwater (2E), Allendale and Lyman Mill Ponds Sediments (7A), and Allendale Floodplain Soil (5A).

- We suggest that as part of the Source Area Soil that the stormwater drainage from the North Providence Post Office and Cumberland Farm area that is directed onto the superfund site and is deposited into the old tail race of the former, now razed, mill at Centredale Manor, be, in addition to the remediation that has occurred on site, reconfigured or enhanced for maximum evaporative and non-erosive discharge. We ask that new cap designed to hazardous waste specifications be included in the restoration of the storm-water discharge area into the former tail race, as described generally in 4E.

As to Lyman Mill Stream Sediment and Floodplain Soil (including Oxbow Area), Alternative 3A.

- We strongly support the first statement, "Gathering additional information to support the final cleanup design" and urge that long-term restoration and prevention of a continued source of potential downstream contamination be at the core of the final cleanup design. Note our comments above about the inadequacy of current mapping.
- We are not convinced that a thin-layer soil cover is adequate protection from erosion of continued flooding of this area, particularly in the prediction of increasing intensity of storms forecast in climate change studies.
- The purposeful deposition of 3 inches of soil will be difficult without earth-moving machinery that will crush existing shrub layer (*Virburnum dentatum*, *Clethra alnifolia*, etc.) and may not be able to maneuver through the stands of saplings.
- Although Audubon Society is a strong advocate for wetlands and understands value of various habitats within vegetative associations of wetlands, we understand that remediation to protect human health on a long term basis may involve destruction of the existing resource. For adequate restoration, a more detailed sampling of existing fauna and flora, as well as an analysis of the soils (types and depths) will yield a better basis for replacement and restoration than exists to date. Mammal, amphibian, bird, reptile, and insect populations in the Oxbow should be surveyed and their habitat requirements should be detailed.
- Mitigation for loss of wetland types should occur according to Army Corps protocols and standards that will satisfy Natural Resource Trustees.

Comments on Restoration of River: Although this is termed a "Restoration Project," the information to date does not suggest how the ecological restoration of Allendale and Lyman Mill Ponds, the river, and associated wetlands will occur. The river lies in a glacial outwash bed and silt and organic sediments have built up and been eroded for 10,000 years. This is a dynamic system with years of urban history. The contaminated sediments identified in this superfund action clearly need to be removed from the ponds and river for human and ecological health, despite the cataclysmic impact to the river system.

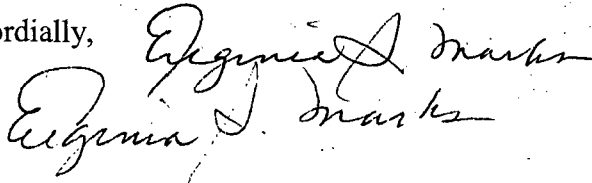
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It is not news to say that remediation is a complex problem, and we suggest restoration to conditions that would be expected within these habitat types within the watershed. A proposed procedure or commentary on the desired outcome of the ecological components of river and its associated banks and wetlands would seem appropriate for a restoration plan, recognizing conditions and aspirations for water quality, recreation, aesthetics, and habitat. Components of such a plan might include

- Biological species of fauna and flora for which restoration is being designed, habitats required, community associations.
- Bottom topography of pond and reach to mimic current conditions of pools and riffles.
- Analysis of the sediment deposition rate (0.5 – 0.6 cm/yr in previous study on Lyman Mill Pond), characteristics of the components of the sediments (deicing sand, storm eroded materials).
- What communities, what suites of species could be expected to repopulate naturally at what durational intervals after restoration work? How long will it take to have sufficient sediment for which species of dragonfly, for example, will use the ponds for successful reproduction? How long will it take to build trophic layers to support fish that attract hooded mergansers, great blue herons, and other bird life observed on the ponds and reaches of the river within the site? Will re-introduction of certain keystone species be considered?
- What species of vegetation would be restored to flood plain and along the banks for erosion control and for habitat enhancement?

Thank you for this opportunity to comment.

Cordially,

A handwritten signature in cursive script, appearing to read "Eugenia Marks".

Eugenia Marks
Senior Director for Policy
Audubon Society of Rhode Island