

Feb. 20, 1997

Mr. Phil Otis
Northern Division
Naval Facilities Engineering Command
Mail Stop 82, Code 1823/PO
10 Industrial Highway
Lester, PA 19113-2090

Dear Mr. Otis,

Thank you for the opportunity to comment, as a private citizen of Rhode Island, on the proposed plan to remediate the Allen Harbor landfill. I greatly applaud the efforts of the Navy, EPA, RI DEM, and the natural resource trustees to "protect human health and the environment while preserving and improving wildlife habitat". However, I do have two major concerns with the preferred remedy of constructing a multimedia cap on the landfill.

The first is that the preferred remedy (as well as alternatives 2 and 4) calls for building a revetment or concrete structure around the landfill. This will cause irreparable harm to the existing marsh, mudflats, and shellfish beds adjacent to the landfill and make restoration of these areas unfeasible and impractical. Because the revetment will have the unfortunate effect of focusing wave energy rather than dissipating wave energy as a marsh does, the existing marsh and mudflats will be eroded away and in time, the integrity of the cap may also be compromised. The major ecological damage caused by the landfill is the destruction and loss of the marsh and wetland habitat upon which the landfill was built. In the decades since the landfilling stopped, the natural habitat has been in the process of gradually restoring itself. The preferred remedy should seek to enhance these restoration processes not cause further damage to the ecology.

My second concern has to do with the fact that the multimedia cap was never designed nor intended to be used in coastal areas. Recent guidance issued by the EPA on the application of CERCLA municipal landfill presumptive remedy to military landfills states that: "... the presence of high water tables, wetlands, and other sensitive environments and the possible destruction or alteration of existing habitats as a result of a particular remedial action could all be important factors in the selection of the remedy" (USEPA Directive No. 9355.O-67FS of December 1996). The tidal range and natural resources adjacent to the landfill certainly qualifies the area as a "sensitive environment". Therefore, if containment is to be the goal of the remediation, then the remediation must conform to design constraints that are compatible with protecting and enhancing the quality of the habitat at the site.

I urge the Navy, EPA, RI DEM, and the natural resource trustees to develop an alternative that will result in the restoration and improvement of our state's natural resources, rather than, in the interest of reducing "perceived risks", cause further ecological damage.

Thank you for considering my comments.

Sincerely,

Robert K. Johnston

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