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TOWN OF CHILMARK
CHILMARK, MASSACHUSETTS

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

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To <i>BRIAN HELLAND</i>	From <i>Barney</i>
Dept./Agency <i>BRIAN CORBETT</i>	Phone #
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GENERAL SERVICES ADMINISTRATION

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29 July 2002

Mr. David Barne
U.S. Department
Caretaker Site C
Former Naval Air Station Weymouth
Northern Division Naval Facilities Engineering Command
1134 Main Street P.O. Box 169
South Weymouth MA 02190-5000

Re: Nomans Land Island

Dear Mr. Barney:

I apologize for the lateness of this letter of comment. The Fact Sheet on the review of the Nomans Island Risk appeared in my mailbox at the Chilmark Town Offices on Monday, 30 July 2002.

As a biologist, I find three points in the reports to be of particular interest.

1. The ponds on the Island seemed to lack the usual fauna and flora, both on the occasion two years ago when I was privileged to accompany a group to the Island, and in subsequent reports. I did see, in the "reservoir-effect" exposed sands along the edge of a pond near the southeastern corner, a band of Cranberry (*Vaccinium macrocarpon*) mixed with several sedges, rushes, and wildflowers, including what I believe to be *Grateola aurea*. The waters of the pond were unusually clear, with no apparent algae, pondweeds, fish, or insects. The Foster-Wheeler reports also seem to indicate a general lack of insect, amphibian, and fish life in the ponds. Have elevated Copper (or other toxics) levels disrupted the food-chain at its base?

2. I missed any reference to amphibians found in the ponds or other wetlands. This would seem to indicate something unusual and inimical to amphibians - possibly a simple disruption of the food chain as suggested above. Admittedly, the ponds on Nomans Island are separated from the nearest active freshwater ponds by three miles of ocean, but much longer distances for transport/dispersion have been documented.

3. The revision in the calculation of the results of the planned Mussel-contaminant uptake experiment, due to loss of cages to weather or Seals, seems to stretch ^{the} available data. Demonstration of a negative finding of pollutant uptake should be based on as complete and wide a collection of data as possible. I consider that a larger set of information does need to be collected, in order to make serious conclusions about the safety of filter-feeders, especially as this gets to be a Human Health Risk assessment.

Sincerely,

Russell R. Walton, Conservation Officer for Chilmark