



WOONASQUATUCKET RIVER WATERSHED COUNCIL

Superfund Records Center  
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May 9, 2008

Ms. Anna Krasko  
EPA New England Region I  
1 Congress Street, Suite 1100  
Boston MA 02114-2023

Dear Ms. Krasko:

Pending review by our new consultants, we would like to reiterate the serious concerns we have relating to the PRP report on the Hydrodynamic Analysis of Remedial Alternatives.

The majority of our concerns relate to (1) the limited geographical scope of the modeling, (2) the focus on average flows which fail to take into consideration the extreme flows induced by the very real potential of increased frequency of intense rain events, more prolonged periods of drought and development patterns impacting stormwater runoff and total suspended solids, and (3) adequate modeling of sedimentation and its impacts to habitat and recreation.

We do not believe the current study can contribute to meaningful alternatives for remediation until additional information is assembled and integrated into the evaluation of the alternatives. This includes:

1. The study does not include characterization of the sedimentation impact on the entire river system. We need a model of the deposition of suspended solids on downstream areas under each of the alternatives. It is inappropriate to predict that the alternatives will have minimum impact on Manton Pond and downstream to Waterplace Park without appropriate studies. Increased anticipated development in Smithfield will increase the amount of impervious surfaces contributing to increased runoff and changes in suspended solids and sedimentation impacting downstream areas. Also missing are evaluations of stormwater runoff from local roads in North Providence, Providence and Johnston, the practice of de-icing with sand, and the resulting solids on the various alternatives. We note, and the study should take into account, that there is little enforcement of the Phase II stormwater regulations. In addition, the study does not take into account the private management of spillways and the impact on sedimentation if annual fall releases continue.

2. The study is based on averages. It is imperative that cases of extreme flows be taken into consideration when evaluating the impact of alternatives on the ponds and downstream river segments. By basing the study on averages, it fails to take into account the impacts of global warming. There is an anticipated increase in the frequency of 50-year storms as well as long sustained drought periods. Each of these impacts should be applied to a river system evaluation of each of the alternatives.

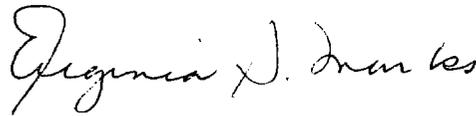
Since this process began we have repeatedly expressed concern for the entire river system, yet each additional study fails to effectively evaluate river system wide impacts. The Study of the 2005 flood and the latest iterations of PRP proposals continue to focus on a limited study area, and fail to acknowledge concerns expressed by the Council and some federal agencies about the health of the entire river system. While we understand that the impoundments do not provide substantial flood storage, they do slow the velocity of the flow. In addition, the sediment load in flood without dams would be moved differently under greater velocity.

We do not believe that the most recent study by the PRP's is sufficient to contribute to any meaningful evaluation of their proposed alternatives.

Sincerely,



Jane Sherman



Eugenia Marks