



COASTAL ZONE
MANAGEMENT

The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02202

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Sato-Longo

April 4, 1983

Merrill S. Hohman, Director
Waste Management Division
U.S. EPA
JFK Federal Office Building
Boston, MA 02203

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Dear Mr. Hohman:

The Massachusetts Coastal Zone Management Office appreciates the opportunity to have reviewed the Draft New Bedford Remedial Action Master Plan (RAMP) dated 24 January 1983 (Roy F. Weston, Inc. U.S. EPA Contract #68-03-1613, work assignment #Z-2-14.11).

The draft RAMP presents a comprehensive initial overview of the highly complex problem that exists in the Acushnet River Estuary New Bedford Harbor, and Buzzards Bay. Your flexible approach to solving this problem is commendable and hopefully it will be pursued throughout the program.

There are two general issues not covered in the RAMP that this Office would like to raise at this time:

1. The stated broad objectives of the RAMP require that issues related to human health, recreation, and economics be dealt with. The RAMP should also give adequate consideration to the impacts to the ecosystem as a whole. There is ample evidence to show that sub-lethal levels of either PCB's or heavy metals can have adverse effects on the productivity and the reproduction of finfish and shellfish throughout their various trophic levels. The RAMP as presently written provides very little data concerning the possible synergistic effects caused by the presence of both chlorinated hydrocarbons and heavy metals. The potential adverse effects on productivity can have major, and lasting, impacts on the dynamics of the marine ecosystem and can eventually affect the harvests of commercially important finfish and shellfish. In the process of deciding "how clean is clean", serious attention should be given to this issue.

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