

R.I. Department of Environmental Management
Division of Groundwater and OWTS
ISDS Section
235 Promenade Street
Providence, RI 02908

November 1, 2008

Dear DEM official;

As Executive Director of the Salt Ponds Coalition (SPC), I am writing to voice opposition to application #0205-0826 for an OWTS system with requested variances submitted by potential buyer Robert Puddicombe of New York, NY and his engineers Dowdell Engineering of Charlestown. SPC is the Watershed Council for the Rhode Island salt ponds, as designated by the Rivers Council and established by the Rhode Island General assembly, and is focused on the preservation of nine coastal salt ponds along the South County coastline.

The lot in question is entirely within Quonochontaug Pond type 2 waters and is designated lot 85 on plat map 1. The current owners of the lot – Great Island Holding Company – are seeking a change in zoning designation from OSR (open space recreation) to R3A (residential, three acres), and have a purchase & sale agreement with applicant Puddicombe, to be executed once/if the designation is changed by the Charlestown Town Council. Great Island Holding Company is comprised of decedents of a family that has subdivided and sold off many lots from the family holdings around Quonochontaug Pond over the years.

SPC opposes the approval of any onsite wastewater treatment system (OWTS) on Bill's Island due to the fragile nature of the native soils, the importance of the foliage and canopy to local and migratory wildlife, and a host of other reasons that I will outline below. This is a unique and critical resource for the Quonochontaug Pond estuary system and should not be disrupted for the purpose of installing an OWTS.

Following are specific objections, concerns, and observations regarding this particular application.

Objections

- Installation of a wastewater system – even a denitrification system - on such an exposed location will negatively affect the resource.
- Testing and analysis by the SPC show that the waters just north of Bill's Island are among the cleanest in the salt pond system. They should remain that way.
- We are even more concerned about the tidal flats south and east of the island, which receive less tidal flushing. These are important estuary and shellfish resource and are heavily utilized by wildlife, as well as the public who access the area from the adjacent DEM public access.
- Even fully functional de-nitrification systems don't eliminate all nutrients, and nutrient contamination from soaps and other household cleaners can work into ground water, which is as shallow as 2.3' according to the application.
- Dog waste and other household contaminants will find their way into the resource from a lot in such close proximity to the water.

- The majority of the lot, if not the entire site, is at risk of flooding in large, though not uncommon storms. Such flooding would pick up contamination from this site, possibly inundate the OWTS, and carry pollutants straight into the pond.
- We worry about the integrity of the soils on this site once the terrain is devegetated and graded. We believe these glacial islands are very susceptible to erosion. Land based soils running into the pond will impact habitat.
- The application calls for an AdvanTex system. Such systems require regular maintenance and are prone to breakdown, which can result in discharge of untreated wastewater. Automated monitoring of installations on sensitive sites is appropriate, but in this case, service responders would not be able to respond promptly, because access to this site will be by boat only. If seasonal resident is away, access could be, for all intents and purposes, impossible.
- AdvanTex systems require electric power and are only effective when they run on a continuous basis, so as to maintain the vitality of beneficial bacteria colonies. There is no electric service to Bill's Island and it is not clear how there ever could be.
- Generator power, or for that matter wind or solar power, are not reliable to maintain a power supply to an AdvanTex system.
- The attached image – based on LIDAR imagery - shows the effect of a three-foot sea-level rise within Quonnie Pond. Bill's Island is largely under water.
- In addition to accessibility problems for service personnel, the site is not readably accessible to other service personnel including routine maintenance and emergency responders.
- The application calls for a variance from the 200' setback regulations of 38% or 75-feet. We feel that is inappropriate in such a sensitive area
- The application is for a six-bedroom system. In addition to being inappropriate to the extreme, such a large system and dwelling structure are probably not practical on a small island. We suspect that aiming high is part of the applicant's negotiating strategy and that they hope to settle on something less. We feel any OWTS on this site would be detrimental.
- The island defines one corner of the recently established oyster reintroduction site where DEM shellfish biologist will attempt to establish a toehold for a new native population. Not only will the OWTS and household pose a threat to this effort, but the land-based dock will be square in the middle of the sanctuary and all supplies to the site during construction and afterwards would pass through the sanctuary.
- Item 1 from the "Vendor Notes" on the engineering drawing submitted by Dowdell Engineering, states that the plan is based on the "purpose of serving the Boulder Cottages." The Boulder Cottages are not associated with this project. They were a separate project located on the mainland. It appears there is mixed information on this plan, which raises questions about the integrity of the data and the level of proofing for the plan submitted.

The health of the ponds and their associated habitat and species are the core mission of the SPC. That is why we must register opposition to this proposal. The soil and vegetation on this island should not be disturbed. What is more, if a system were installed we see no way it could be effectively operated and maintained. The family estate has gained much from the subdivision and sale of the family farm over the years and we feel that this application is a lot too far. Some lots simply are not appropriate for construction and this is a prime example. All who utilize this wonderful resource will appreciate your close attention to this important matter.

Thank you for your concern,

Sincerely,

Mark Bullinger
Executive Director, Salt Ponds Coalition

Quonnie Pond With a 3-foot Sea Level Rise



The existing waterline is indicated by the thin black lines. Light blue shading shows areas that would be inundated with a three-foot rise in sea level. Bill's Island would be largely under water.