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FOR THE ENVIRONMENT



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Empowering Communities, Advocating Solutions.

September 16, 2009

Mr. Gregory Goepfert
Project Manager, US Army Corp of Engineers
New York District
CENAN-PP-E, Room 1811
26 Federal Plaza
NY, NY 10278

RE: Comments on the Draft Final Engineering Evaluation/Cost Analysis (EE/CA) Report for PCB-Contaminated Areas at the Former Fort Slocum/Davids Island, New Rochelle, NY

Dear Mr. Goepfert,

CCE is an 80,000-member, non-profit, nonpartisan, advocacy organization founded in 1985 to protect public health and the natural environment in New York and Connecticut. CCE works to build widespread citizen understanding and advocacy for policies that protect interdependent land and water resources, wildlife and public health. One of CCE's top priorities is the protection of Long Island Sound (LIS). CCE has been an active member of the Long Island Sound Study Citizens Advisory Committee, which works to implement the LIS Comprehensive Conservation Management Plan designed to restore and protect the Sound.

CCE has been involved in efforts to protect Davids Island, a 78-acre island off the coast of New Rochelle, since 1991. We have always advocated and continue to advocate for the clean-up of Davids Island followed by parkland designation.

CCE fully supports the Army Corps recommendation to remove the surface and subsurface PCB-contaminated soil and to properly dispose of the contaminated soil off-site, known as alternative 3 in the Draft Final Engineering Evaluation/Cost Analysis (EE/CA) Report for PCB-Contaminated Areas at the Former Fort Slocum/Davids Island, New Rochelle, NY.

This option is both protective of public health and the environment for now and in the future. PCB's are persistent man-made chemicals that were banned in the mid-1970s. Well established in the scientific literature is that PCB's accumulate in the fat of fish and other animals and exposure is linked to low birth weight, learning disabilities, decreased memory, and reproductive

problems. A full clean-up of the contaminated soil is necessary and preventive of future health and environmental concerns.

Dauids Island is a true unpolished gem that holds the same potential as Governors Island. As documented in the Journal News, “A tale of two islands,” Governors Island shares a similar history to Davids Island. Yet today, Governors Island is a bustling public park complete with beaches, hammocks, picnics, and summer concerts. Davids Island remains contaminated, unused, and future planning is moving at pre-global warming glacial speed.

CCE urges the Army Corp to move forward and expedite the remediation needed on the island. We commend the Army Corp in choosing the most comprehensive clean-up option. However we would caution all parties involved that a full clean-up does not and should not equate to sale of Davids Island to a private investor.

The Draft document states that clean-up “would permit land usage from single family homes through manufacturing facilities, but disallowing raising livestock or producing animal products for human consumption on the property” (ES-1 & page 4-1). The battle to preserve Davids Island as a public resource has been a long and active fight. The public has consistently and overwhelmingly demonstrated strong support for Davids Island as parkland. This public support for preservation of this critical natural resource is what has advanced federal dollars for the needed remediation efforts. Let us be clear, the report may be referring to a standard of clean up that allows homes to be built, however, this should not be misconstrued as a green light for development. We urge the Army Corp to work with the City of New Rochelle and Westchester County to advance remediation efforts so that the island can be used as parkland, accessible to all members of the public.

Thank you for this opportunity to comment.

Sincerely,

Maureen Dolan Murphy
Executive Programs Manager