

From: kaltofen@aol.com  
To: matthew.gardner@  
Sent: Thu, 2 Apr 2009 2:57 pm  
Subject: Re: Con Com meeting: For Distribution

Matthew Gardner, Chairman  
Natick Conservation Commission  
Town Hall  
Natick, Massachusetts

Dear Dr. Gardner,

My comments on this proposal follow. Please accept them as my written submission to the Commission on this issue.

After review and after discussions with colleagues about the proposal for herbicide use in Lake Cochituate, it is my professional judgment that herbicide use should be prohibited in Lake Cochituate.

I have also reviewed the US Army's final sediment remediation feasibility study for Lake Cochituate, and spoken with a USGS official who specifically has worked on US Army restoration policy matters, as they relate to prior contamination. Prior contamination of Lake Cochituate by herbicides, pesticides, and so on, allow the Deputy Undersecretary of the Army for Environmental Affairs to allow looser, less protective, clean up standards in Natick.

As you know, fish taken from Lake Cochituate contain unhealthy levels of Polychlorinated Biphenyls, (PCBs), and should not be consumed. PCBs in lake sediments cause PCB levels fish to rise. A sediment cleanup is under consideration by the US Army, to reduce PCB levels. The use of herbicides in Lake Cochituate reduces the regulatory requirements for sediment cleanup, because the lake could be considered more impacted, and the US Army believes it should not have to restore a pristine environment, if other forces are at work reducing sediment quality.

I believe that this herbicide use proposal will have a negative impact on the sediment remediation proposal, now up for review. The use of herbicides at the proposed location will compromise the sediment quality background standards, which are used to determine the degree of clean up for PCB-contaminated sediments around the US Army post on Lake Cochituate.

The use of nonherbicidal means of exotic plant removal at the beach/ramp area should have no adverse impact on remediation decisions or actions, and thus I have no objections.

However, mechanical or other means of exotic plant removal, in PCB-contaminated portions of the lake, would have environmental health and public health safety risks, and would have to be dealt with in a different proposal.

The proposed herbicide use zone is not in the PCB contamination zone, but the relationship between weed removal, herbicide use, and PCB clean up remains complex and unavoidable.

I submit this written comment to the Conservation Commission, as Community Co-chair of the Natick Soldier Systems Center Restoration Advisory Board. This, of course, does not necessarily represent the opinions of the other board members.

Thank you for your attention.

Very truly yours,

Marco Kaltofen, PE, Civil  
Community Co-chair  
US Army Natick Soldier Systems Center  
Restoration Advisory Board