



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
WASHINGTON, DC 20310-0103

24 OCT 1985

Honorable Richard E. Sanderson
Deputy Assistant Administrator
for External Affairs
Environmental Protection Agency
Washington, D. C. 20460

Dear Mr. Sanderson:

This responds to your October 1, 1985, letter requesting higher level review of a decision by the Norfolk District Engineer to issue a permit to Gloucester County for the proposed Beaverdam Swamp Water Supply Reservoir.

You have requested elevation based on all three criteria in the 1982 Memorandum of Agreement between our agencies. Specifically, you believe that a significant new potential alternative, reverse osmosis, exists and was not adequately considered by the District. You also take issue with the wetland evaluation method used to compare alternatives and believe that wetland impacts to the Chesapeake Bay watershed is an issue of national importance. We have carefully reviewed your comments and considered them in light of the final action documentation prepared by the District.

In response to your concerns, I will have the Division Engineer review part of the decision. His review will be limited to the issue of reverse osmosis as a potential alternative to Gloucester County's water supply needs. Your regional staff has put a lot of effort into this possible alternative in determining the state of the art and present applications. Similarly, the Norfolk District has carefully looked into the application of reverse osmosis in Gloucester County. I believe review by the Division Engineer is appropriate considering the intense effort by your Region and the Norfolk District when considered with the impact of this potential alternative should it be found to be practicable.

Regarding lack of coordination on the type of wetland evaluation method, the District carefully considered the issue during the scoping process of the Environmental Impact Statement (EIS). Your regional

staff was involved in that process. After the scoping process and analysis by the District using the Golet method, your staff recommended using the Adamus method. Your Region believed that the Adamus method which considers water quality and other issues in addition to fish and wildlife habitat was essential to the review. These other issues, including water quality, are carefully considered in the EIS using site specific and comparative data.

The Chesapeake Bay is certainly an area of concern from an environmental standpoint. However, the applicant has proposed substantial mitigation for the proposed flooding of approximately 350 acres. The Norfolk District has carefully considered potential individual and cumulative impacts of the project and determined that they will not significantly impact the Chesapeake Bay.

I have directed the Chief of Engineers to ensure that the District Engineer document his complete review of reverse osmosis, as a potential alternative, including his careful review of the information your Region has provided. The District will forward this information to the Division Engineer for review. After his review, the Division Engineer will discuss this with your Regional Administrator prior to forwarding his recommendation to the District.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert K. Dawson", with a large circular flourish at the end.

Robert K. Dawson
Acting Assistant Secretary of the Army
(Civil Works)