

January 18, 2005

Susan Svirsky
Rest of River Project Manager
Environmental Protection Agency
Mail Code HBO
1 Congress St., Suite 1100
Boston, MA 02114

Re: **Housatonic River Ecological Risk Assessment**

Dear Ms. Svirsky:

On behalf of Mass Audubon, we submit the following comments on the revised Ecological Risk Assessment (ERA) for the Housatonic River. Mass Audubon appreciates the efforts the EPA has engaged in to make this document as complete and rigorous as possible. We urge that the cleanup planning process for the Rest of the River proceed expeditiously but in a continued rigorous manner in order that risks to wildlife and people will be mitigated as soon and as thoroughly as possible.

Mass Audubon owns and operates the 262-acre Canoe Meadows Wildlife Sanctuary, located in Pittsfield within reach 5A, not far downstream from the confluence of the East and West branches. The sanctuary, which fronts the Housatonic River for approximately one-half mile, is home to seven state-listed species of animals and plants, including American Bittern (state endangered) and Wood Turtle (special concern). A considerable amount of the sanctuary's acreage is within the 10-year floodplain directly affected by PCB contamination. The sanctuary, since its establishment in 1975, has been dedicated to natural resource conservation and education. As such, the negative impacts on wildlife as a result of PCB contamination weigh even more heavily upon the sanctuary than upon parcels dedicated to other uses.

Canoe Meadows Wildlife Sanctuary is located in Reach 5A, the first section (most northerly) dealt with in this report. The highest concentrations and frequency of detections of PCBs are found in Reach 5. The predicted risks to amphibians is highest in Reach 5A; a majority of the amphibians and 50% of the vernal pools are at risk. Fish are at risk in all reaches of the Prime Study Area. Other wildlife species deemed to be at high risk include birds (Bald Eagle, Wood Duck, and Osprey) and mammals (Mink, River Otter, Short-tailed Shrew). Several other species were estimated to be at intermediate risk. The studied species are representative of many other species of wildlife present in the area, which are likely to be at risk from exposure to PCBs.

Mass Audubon urges that the EPA and General Electric move expeditiously to the next phase of the cleanup planning, i.e. establishment of Interim Media Protection Goals (IMPG). The IMPGs should be set at levels that will protect human and ecological health, both on Mass Audubon property and throughout the Rest of the River. The associated remediation measures to achieve these goals should address the potential future spread of contamination through flooding events.

Mass Audubon requests that we continue to be kept informed about the restoration planning process, especially in regards to any activities or remediation on Mass Audubon property. Canoe Meadows sanctuary director Rene Laubach can be reached at 413-637-0320 x 8351 or rlaubach@massaudubon.org.

Thank you for considering these comments.

Sincerely,

Sincerely,

E. Heidi Ricci
Senior Environmental Policy Specialist

René Laubach
Sanctuary Director
Berkshire Wildlife Sanctuaries

cc: Congressman John Olver
State Senator Andrea F. Nuciforo, Jr.
State Senator Peter J. Larkin
Pittsfield Mayor James Roberto
Caleb Mitchell, Administrator, Pittsfield Conservation Commission
Rachel Fletcher, Housatonic River Restoration
Tad Ames, Berkshire Natural Resources Council