

HOUSATONIC RIVER COMMISSION

"to coordinate on a regional basis the local management and protection of the Housatonic River Valley in northwestern Connecticut"

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November 9, 2005

Susan Svirsky
Rest of River Project Manager
C/o Weston Solutions
10 Lyman St., Suite 2,
Pittsfield, MA 01201

Dear Ms. Svirsky,

I write on behalf of the Housatonic River Commission, whose commissioners represent the municipalities of Salisbury, North Canaan, Canaan/Falls Village, Sharon, Cornwall, Kent, and New Milford, Connecticut. The Commission understands that the Interim Media Protection Goals (IMPG) proposed by General Electric in September for the rest of the Housatonic River are subject to review and approval by the Environmental Protection Agency before becoming final. Although EPA's website fails list an open public comment period for this proposal, the Housatonic River Commission understands that a deadline of November 15th exists for public comment.

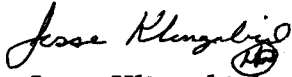
The Commission wishes to register our alarm at the extreme ranges and maximum parts per million (ppm) offered by GE as alternatives to EPA's own analysis of what is an acceptable standard for "rest of river" restoration. We urge EPA to reject GE's Interim Media Protection Goals and adopt a more conservative standard that will allow the Housatonic to recover so that permit swimming, fishing, and floodplain farming may occur once more without fears for human and environmental health.

We believe that allowing a range of ppm for PCBs as GE suggests will needlessly create a weaker performance standard, in which GE must only achieve the maximum ppm level in any range to reach its goal. It would be irresponsible to accept the maximums provided by GE as sufficient to maintain healthy, self-sustaining populations of target species, when these amounts are many times above the levels established by the Food and Drug Administration for safe human consumption.

GE's alternative goals are disingenuous and appear to be based on the minimum standard for species viability. The range given for the federally threatened bald eagle is alarming in its excess, while the standard offered for mink is just beneath the level at which EPA's own research has shown that mink suffers high litter mortality. When the impacts of a toxin as noxious as PCBs are not fully understood for a species of concern, it is both appropriate and necessary that a more conservative standard be applied. The Housatonic

River Commission urges EPA to trust its own research and require GE to achieve a legitimate standard for rest of river restoration.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jesse Klingebiel". The signature is written in black ink and is positioned above the typed name.

Jesse Klingebiel, Chairman
Housatonic River Commission

cc: file, HRC, Robert W. Varney, EPA New England Regional Administrator