



November 15, 2005

Susan Svirsky
“Rest of the River” Project Manager
U. S. Environmental Protection Agency
10 Lyman Street, Suite 2
Pittsfield, MA 01201

Dear Ms. Svirsky,

We are writing to comment on the proposed Interim Media Protection Goals (IMPGs) Proposal, part of the Rest of River Remedial Process. As you know, Mass Audubon owns and operates the 262-acre Canoe Meadows Wildlife Sanctuary in Pittsfield. The sanctuary, which is located within Reach 5A of the Primary Study Area, approximately one mile downstream of the East/West Branch Confluence, includes one-half mile of the Housatonic River’s banks and its associated floodplain.

The document contains two sets of IMPG ranges with regard to proposed allowable limits for Polychlorinated biphenyls (PCBs) in soils and sediments relative to human health protection and in various “ecological receptors” (species of benthic invertebrates, certain fish, amphibians, birds, and mammals).

One set of ranges of IMPG values for PCBs in soil/sediment is based on the Human Health Risk Assessment (HHRA), while numerical PCB ranges are based on the Ecological Risk Assessment (ERA) direct exposure assumptions, toxicity values, and data interpretations used in the respective studies. The second set of IMPG ranges presented in the IMPGs Proposal are based on many of these same inputs combined with several alternative exposure assumptions, toxicity values, and data interpretations that GE believes to be more scientifically supportable.

While Mass Audubon was not able to conduct an independent scientific review of this data, it is our understanding that the first set of IMPGs ranges was peer-reviewed by a panel of experts and accepted by the EPA. We are therefore inclined to support the conclusions reached by the expert peer-review panel.

This is a long and complex process, and we appreciate all the work undertaken by EPA, GE, and many other parties. We hope and trust that the EPA will continue to strive to apply the best possible current science to all of its decisions on this important environmental cleanup process.

Sincerely,

E. Heidi Ricci
Senior Environmental Policy Specialist

René Laubach
Sanctuary Director
Berkshire Wildlife Sanctuaries

Cc: Michael Carroll, Manager of Corporate Environmental Programs, GE
DEP