Subject: FW: comments on CMS Proposal

Attachments: Housatoniccleanup.correctivemeasurescommentstoEPA.doc

To: Susan Svirsky/R1/USEPA/US@EPA
From: "Heidi Ricci" <hricci@massaudubon.org>
Date: 03/28/2007 04:50PM
cc: "Rene Laubach" <rlaubach@massaudubon.org>, "Gail Yeo" <gyeo@massaudubon.org>
Subject: comments on CMS Proposal

Dear Susan

Attached are Mass Audubon's comments on the CMS Proposal for the cleanup of the Housatonic River. I am putting a signed hard copy in the mail to you.

Thank you for the time you spent explaining the proposal to me and Rene, and answering our questions.

Heidi

<<Housatoniccleanup.correctivemeasurescommentstoEPA.doc>>

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March 27, 2007

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

Dear Ms. Svirsky,

On behalf of the Massachusetts Audubon Society I submit the following comments on the draft Corrective Measures Study (CMS) Proposal prepared by General Electric for the GE/Housatonic River Site—Rest of River (ROR). The Draft CMS Proposal presents a menu of options from which to choose for dealing with PCB contamination in the Housatonic River, along with criteria to evaluate and weigh the clean-up options. The Interim Media Protection Goals (IMPGs) approved by US Environmental Protection Agency (EPA) will be used to evaluate these various remedial alternatives.

This Proposal, as we understand it, is the Scope of Work for the actual CMS, which will be issued for public review later this year. Reviewers of the CMS will be looking to determine whether the remedial alternatives presented by GE are adequate to safeguard human health from the negative and long-lasting effects of the PCBs, and whether the remedies proposed ensure that sensitive wildlife receptor populations are naturally reproducing and sustaining. We understand the CMS is a complex analysis process entailing sites with a range of contamination; short vs. long term outcomes from various alternatives; cost and effectiveness; and other factors. The key at this stage is making sure that the full range of potentially appropriate alternatives are included in the study.

Mass Audubon Property and PCBs

As you know, Mass Audubon owns and operates the 262-acre Canoe Meadows Wildlife Sanctuary, located in the City of Pittsfield within reach 5A, not far downstream from the confluence of the East and West branches of the Housatonic River. The sanctuary, which fronts the 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). Approximately 25% of the sanctuary's acreage is within the 10-year floodplain directly affected by PCB contamination of up to 120 ppm. The sanctuary, since its establishment in 1975, has been dedicated to natural resource conservation and public 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.

With regard to the recommended remedial alternatives proposed in the draft CMS, we offer the following specific comments:

Geographic and Time Scale Considerations, Restoration of Disturbed Areas:

The alternatives analysis needs to be applied at a sufficiently fine scale across the landscape to enable application of different methods as appropriate. This may mean applying several different approaches within relatively localized areas of the landscape, such as Mass Audubon's sanctuary. Approaches that maximize removal of the areas of highest contamination while minimizing remediation-related disturbance or destruction of important habitat features in areas that have extremely low levels of contamination should be explored as much as possible.

Because of the long-term nature of PCB contamination, it may well be appropriate to accept some relatively severe short term alterations of habitat in exchange for a much healthier system over the long term. However, it is absolutely essential that the restoration of areas disturbed by remediation be very carefully planned, implemented, and monitored. This should include strong provisions to prevent establishment of invasive species in disturbed areas, and restoration of important habitat features such as bank habitat and vegetative structure and diversity to as close to "natural" conditions as possible.

Rechannelization:

Rechannelization is being considered as an alternative to manage contaminated sediments in oxbow backwater areas. These areas are also critically important wildlife habitat. Any permanent loss of such habitat or its connectivity to the river must be very carefully weighed against other options. If such actions are deemed the only viable option in particular locations, then additional restoration/mitigation should be provide through creation of similar floodplain features elsewhere in as close proximity as possible. This will entail additional expense since potentially developable upland may need to be converted to wetlands and floodplains. Those costs should be factored in when weighing this option against other alternatives for remediating PCBs in those oxbow areas.

Emerging Technologies and Adaptive Management:

The remediation planning and implementation process will be ongoing for a number of years. While alternative in-situ treatment technologies are not presently available for utilization, the remediation plans should be flexible enough to enable new technologies to be considered if and when they become available during further phases of planning or implementation. This is part of an adaptive management approach, and appropriate for such a complex project of many years duration.

Thank you for this opportunity to comment on these important issues. We will continue to participate in this process for the duration of the river clean-up.

Sincerely,

Laura A. Johnson
President