



Commonwealth of Massachusetts

Division of Fisheries & Wildlife

Andrew Madden, *District Manager*

March 28, 2007

Ms. Susan Svirsky
EPA Rest of River Project Manager
c/o Weston Solutions
10 Lyman Street
Pittsfield MA 01201

RE: Corrective Measures Study Proposal (CMS) Comments

Ms. Svirsky:

Thank you for the opportunity to comment on the draft CMS proposal. I understand that these comments will be considered informal and that an official public comment period will follow EPA's release of the proposed cleanup plan. However, this is an important time in the process because our agency is not only the steward for the Commonwealth's biological resources, but we are also the largest land owner in the Primary Study Area (PSA). With this in mind please accept the following comments on the draft CMS.

There is very little discussion within the document of restoration and post-remediation conditions. The PSA, much of which is owned by Massachusetts Division of Fisheries and Wildlife (MDFW), is a species rich, productive reach of river and floodplain with a complex river channel and numerous rare species. None of the alternatives proposed address these conditions pre- and post-remediation. The only mention of post-remediation restoration is the reseeded of disturbed areas. In an area as ecologically significant as the PSA, this is not sufficient. I would expect to see individual plans for protection and/or restoration of rare plants and animals. Further, I would expect to see natural stream channel replication and the application of bioengineering methods. If this project results in a post cleanup condition similar to the first two miles, it would be considered a disaster and complete ecological failure by our agency.

The evaluations of the options for streambank and floodplain remediation (Section 5) are based solely on the removal/containment of pollutants. There is no evaluation based on ecological considerations. Even if the Interim Media Protection Goals (IMPG's) can be reached for the representative species, without standards for habitat requirements, these species will fail to exist in the remediated areas. Evaluation should address the long term feasibility of the alternative, not only in terms of PCB toxicity, but also in terms of

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species habitat needs and restoration of ecological communities. Without these considerations, I submit that the result of the Corrective Measures Study will be incomplete and have little relevance to the ecological health of the river.

Finally, it would be difficult at best to envision any scenario where the onsite disposal options such as a Confined Disposal Facility (CDF) would be acceptable on our property. Creating a contained disposal facility within the waterway may be suitable to large offshore sites but would not be appropriate for the river.

In summary, I encourage you to seek additional alternatives to those presented in the draft proposal and require the CMS to include ecological evaluations in both the short and long term. The cleanup of the Housatonic River offers a chance for application of new technologies and creative thinking. I understand the limitations of the newer technologies, particularly when applied at a large scale, however the lack of new techniques was disappointing. Massachusetts Division of Fisheries and Wildlife will likely have substantial comments on the chosen corrective measures. Thank you for this opportunity to highlight some of these concerns at this point in the process.

Sincerely,



Andrew Madden
Western District Manager

CC: Wayne McCallum, Rob Deblinger, Mark Tisa, MDFW