



Long Hill
572 Essex Street
Beverly, MA 01915-1530

tel 978.921.1944
fax 978.921.1948

www.thetrustees.org

Friday, May 16, 2008

Ms. Susan Svirsky
Rest of River Project Manager
United States Environmental Protection Agency
c/o Western Solutions
10 Lyman Street
Pittsfield, MA 01201

RE: EPA-GE Housatonic River Site, Corrective Measures Study Public Comments

Dear Ms. Svirsky:

I would like to thank you and EPA for taking informal comments in regards to General Electric's Housatonic River "Rest of River Corrective Measures Study. We hope that this insightful process may indeed lead to the best possible cleanup for the river.

For 117 years, The Trustees of Reservations has been preserving for public use and enjoyment properties of exceptional scenic, historic and ecological value in Massachusetts and working to protect special places across the state. This remains our mission.

It is with this purpose in mind that the Trustees have been strong advocates for the Housatonic River – truly a special place. We played a key role in securing federal designation of the Upper Housatonic Valley National Heritage Area. Within this boundary we own and manage eleven properties, one of which is Bartholomew's Cobble. Of the Cobble's 329 acres, 76 acres directly abut the river.

Bartholomew's Cobble is one of The Trustees' most important properties and has received federal recognition as a National Natural Landmark. Thankfully, none of the clean-up proposals GE has submitted pertain directly to this property, but we very concerned about the negative impact on proposals directly affecting the Canoe Meadows in Pittsfield, MA, a property owned and managed by the Massachusetts Audubon Society.

The idea of dredging and land filling with contaminated material, cutting down all the trees along the banks, and replacing the embankments with rip-rap should not be the only clean-up and restoration option. This is a remarkably beautiful and scenic river that should retain its beauty and ecological values irrespective of the clean-up method. We ask that the EPA require GE to follow a process that takes full advantage of the latest science and technologies.

GE estimates that this clean-up may take 50 years. Given that extraordinary length of time, we ask EPA to mandate a phased process that includes public involvement and definite benchmarks for progress and critical evaluation. To make decisions today for a cleanup that far in the future would be unrealistic. A better idea would be to go more slowly, have more public input along the way, embrace new and better ways of remediation as the cleanup progresses, and include a process of adaptive management that calls for review of successes and failures and allows for changes in strategy based on this information.

BOARD OF DIRECTORS

F. Sydney Smithers IV
Chairman

Frances Colburn
Vice Chairman

Henry S. Reeder
Secretary

Franz Colloredo-Mansfeld
Treasurer

Amy L. Auerbach

Eugenie Beal

James L. Bildner

Rebecca Gardner Campbell

David D. Croll

John W. Delaney

Franklin L. Feigin

James S. Hoyte

Elizabeth B. Johnson

Brian M. Kinney

Edward H. Ladd

Catherine C. Lastavica

Lynn W. Lyford

Virginia M. Murray

Scott A. Nathan

Thomas H. Nicholson

Nicholas W. Noon

Eunice J. Panetta

Augusta Perkins Stanislaw

John E. Thomas

PRESIDENT

Andrew W. Kendall

Charles Eliot founded the Trustees on the premise that people and land are interconnected and that natural and cultural landscapes play a key role in supporting a healthy society. In that spirit, we strongly endorse the following ten principles of the Housatonic Clean River Coalition (HCRC) on this issue.

We endorse HCRC's Ten Principles for a Better River Cleanup.

1. Long-term health and environmental goals for the project should be described clearly and simply at the beginning of the clean-up.
2. Areas of contamination should be addressed a few at a time in phases rather than all at once.
3. Each phase should include pilot projects to test new technologies.
4. Plans should be reviewed and revised at the end of each phase.
5. The community should have a formal and substantial role in planning each new phase.
6. Planning for each phase should be guided by limits on environmental disruption and cost established at the beginning of the process.
7. A comprehensive health study should be conducted by an independent body, and the results of that study should influence planning and priorities.
8. The entire river, including areas downstream in Connecticut, should be evaluated for remediation in each phase.
9. Sources of continued contamination of the river should be identified, evaluated, and remediated.
10. If the EPA mandates dredging, lined landfills should be considered only as purely temporary measures.

Once again, we very much appreciate EPA's proactive approach to inviting these comments. We want to see a comprehensive clean-up take place, following as much informed public participation and expert consideration as can be achieved. Thank you for your consideration.

Sincerely yours,



Andrew W. Kendall
President