

August 29, 2008

*Ian A. Bowles, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114*

*Dear Secretary Bowles:*

*On behalf of many citizens, communities, and supporting organizations, and pursuant to the Area of Critical Environmental Concern Regulations (301 CMR 12.00), we submit to you this Nomination of the Upper Housatonic River as an Area of Critical Environmental Concern (ACEC).*

*The area nominated - the Upper Housatonic River – includes a 13-mile stretch of the river extending from the confluence of the East and West Branches in south Pittsfield southward to north Lee. It includes portions of four communities – Lee, Lenox, Pittsfield, and Washington – and covers approximately 12,280 acres.*

*This stretch of the Housatonic River is comprised of a complex and rich ecosystem that includes the river itself, adjacent wetlands and floodplains, several tributary streams, abundant wildlife, concentrations of rare species, and the steep, forested, western slopes of October Mountain State Forest. The river and its adjacent uplands also provide an array of dramatic scenic vistas and a wide range of public educational and recreational activities on protected lands, and include important historical and archaeological resources.*

*The Massachusetts Division of Fisheries and Wildlife (DFW) recently referred to the Housatonic River watershed as “one of the most biologically rich and unique regions in the Commonwealth,” supporting “a unique ecosystem” with “many species found nowhere else in Massachusetts.” Indeed, there are 31 documented state-listed rare species located within the proposed ACEC. The Massachusetts Audubon Society (Mass Audubon) has designated the Upper Housatonic River Valley as an Important Bird Area, underscoring its significance as bird habitat and as a migratory corridor, and referring to the “approximately 1,300 acres of riparian wetland, oxbow ponds, marshes, beaver swamps, grasslands, and upland woods along the meandering Housatonic River” (located in the proposed ACEC) as representing “some of the finest riparian habitat remaining in Central Berkshire County.”*

*Critical protected lands located within the nominated area include the 818-acre DFW George L. Darey Wildlife Management Area, the adjacent 200-acre Post Farm managed by the Lenox Conservation Commission, and the 262-acre Mass Audubon Canoe Meadows Wildlife Sanctuary along and adjacent to the river corridor, plus approximately 5,500 acres of critical uplands located in October Mountain State Forest.*

*Our general goals are identical to those that have accompanied ACEC designations throughout the state for the past 30 years:*

- To recognize the critical environmental value and significance of this area, and to use the ACEC designation to help preserve, restore, and enhance the resources and ecosystem of the Upper Housatonic River.*
- To direct state agencies to provide higher standards of review and protection for the Upper Housatonic River ACEC, and to establish a framework for local, regional, and state stewardship.*
- To educate our communities and citizens about the environmental significance of the resources of this area and ecosystem, and to encourage citizen and community involvement in the long-term protection and management of the ACEC.*

*We also intend to use this ACEC designation to help build a strong community coalition to raise awareness of the important resources of the Housatonic River with a science-based rationale, with the goal of increasing community and state agency participation in the current examination of alternatives and long-term solutions needed to address the clean-up of the current levels of PCB contamination in and along the river, and to develop and implement a restoration plan that returns the river and its resources to a functioning and healthy habitat and ecosystem.*

*We are very aware that an ACEC designation is not a “silver bullet” that will magically remove contaminants from the river and assure a complete restoration. However, we strongly believe that an ACEC designation will help focus attention on this crucial stretch of the river, both in terms of its extraordinary resources and in terms of the next stage of the proposed clean-up, an enterprise that will affect not only this stretch of the river but also miles of downstream communities, both human and environmental. It will also support our long-term efforts to provide the wise stewardship that this special stretch of the river deserves.*

*Please also see the one-page Purpose of Upper Housatonic River ACEC Designation included in the first section of the nomination document.*

*In terms of public outreach and education, we have worked diligently to build a strong base of individuals, organizations, and public officials who support the nomination, as evidenced by the individual nominators listed below and the letters of support that accompany the nomination. We held a well-publicized meeting to inform the public about the nomination, and the goals and purposes of ACEC designation in the Lenox Town Hall on August 7, 2008. Approximately 135 people attended the meeting, and strong support was voiced for this initiative. Further information about our public outreach efforts is included in Appendix G of the nomination. We are eager to work with you and ACEC Program staff to schedule any additional public meetings that may be needed prior to the commencement of a formal nomination review by your Office.*

*As stated in the nomination document, we are confident that the combination and concentration of the resources of this special area leave no doubt that it meets the ACEC threshold of regional or statewide significance and that the Upper Housatonic River nomination merits ACEC designation.*

*Very truly yours,*

**Concerned Citizens and Nominators of the Upper Housatonic River  
as an Area of Critical Environmental Concern**

[ The nominators' signatures are on file and  
have been replaced with this typed list. ]

1. Morgan Bulkeley 3rd
2. George S. Wislocki (Green Berkshires, Inc.)
3. George L. Darey (Green Berkshires, Inc.)
4. Eleanor Tillinghast (Green Berkshires, Inc.)
5. Timothy Gray (Housatonic River Initiative; Housatonic Riverkeeper)
6. Jane Winn (Berkshire Environmental Action Team)
7. Benno Friedman (Housatonic River Initiative)
8. René Laubach (Massachusetts Audubon Society)
9. Warren E. Archey (Lenox Land Trust)
10. Smitty Pignatelli (State Representative)
11. Christopher. J. Waitekus (Pastor, St. Ann Church)
12. Patricia A. Archey
13. Linda Messana (Lenox Select Board)
14. Charlie Liston
15. Lorraine A. Schulze
16. Joseph H. Nolan
17. Michael L. Ward (Pittsfield City Council, Ward 4)
18. Denis E. Guyer (State Representative)

19. Margo N. Paddock
20. Gretchen DeBartolo
21. Marjorie Cohan (Berkshire Bike Path Council)
22. J. Thomas Ferguson (Lenox Sportsmen's Club)
23. Mark Miller
24. Michael Makes
25. Clemens Kalisher
26. Jonathan Lothrop (Pittsfield City Council, Ward 5)
27. Ben Downing (State Senator)
28. Tad Ames (Berkshire Natural Resources Council)
29. Mark Jester (Berkshire County League of Sportsmen)
30. Christopher N. Speranzo (State Representative)
31. John W. Olver (U.S. Congressman)
32. George Hamilton, Jr.
33. Eugene R. Chague (Taconic Chapter of Trout Unlimited)
34. Philip G. Hiser Jr. (Lee Sportsmen's Association)
35. Stephen Pavlosky (Select Board, Lenox)
36. Ginny Akabane
37. Laura Johnson (Massachusetts Audubon Society)
38. Andrew Breslin
39. Dennis Regan (Housatonic Valley Association)
40. Edwin J. Neumuth
41. Rose Borgnis (Select Board, Washington)
42. Bill Cawley (Select Board, Washington)
43. Susan Minnich