



**CITY OF PITTSFIELD**

DEPARTMENT OF PARKS AND RECREATION, 874 NORTH STREET, PITTSFIELD, MA 01201 (413) 499-9343 FAX (413) 448-2867

October 13, 2006

Housatonic River Natural Resource Trustees  
c/o Woodlot Associates, Inc.  
30 Park Drive  
Topsham, Maine  
04086-1737

**Re: Revitalization of the West Branch of the Housatonic River (ID #7)**

Dear Trustees:

The City of Pittsfield and Riverways Program in the MA Department of Fish and Game (Riverways) thank you for the opportunity to submit comments on the Evaluation Summary Memorandum for Proposal Application # 7, *Revitalization of the West Branch of the Housatonic River*, one of the only proposals that directly seek to remediate PCB contaminated sediments and directly improve riverine function and health in the community most heavily impacted by PCB contamination.

A question raised throughout the review concerns whether the greenway and dam removal components of this project proposal should be separated. Project partners including the City, Riverways and the Berkshire Regional Planning Commission (project team) strongly feel that the restoration and revitalization of the West Branch of the Housatonic River and Westside Neighborhood depend upon both interrelated and complimentary components.

Dam removal and river restoration needs to be understood in the context of overall river health. The impaired and unsafe dam and contaminated sediments in the core of the project area must be addressed if we are to promote public access and interpretation of the river. Increasingly, river restoration is used as a tool for not only watershed but neighborhood revitalization. One needs to look no further than communities like Providence or San Antonio to see that river restoration, coupled with public awareness and access, spurs economic and urban revitalization. To separate the two components would limit the potential social and ecological impact of the proposal.

In the original application the *Dam Removal Feasibility Study* prepared by Kleinschmidt for the Mill Street Dam Removal was cited extensively and a draft of the report was linked and posted on the City of Pittsfield website, because many of the comments and questions raised in the evaluation refer to issues addressed in that report and subsequently completed *Hydraulic and Scour Analysis for Dam Removal Feasibility Study* both reports (and plan sheets) are attached for your further review. These reports comprehensively address budget detail (*Criterion C3*), current dam condition (*Additional Comments*), discussion of measurable results (*Criterion A4 and B4*) and contingency actions (*Criterion B5*). It is unclear why scores were lowered for these criteria when these issues were addressed in the draft report made available to reviewers and the Trustees.

The following comments specifically address issues raised in the bulleted criterion list:

*Criterion A4 and B1*

There seems to be consensus of concern among the reviewers about the rock ramp or constructed riffle restoration alternative. It should be made clear that the rock ramp was a considered alternative and not the identified preferred approach. Implicit in the development of a feasibility study is an evaluation of practicable alternatives. In fact, a prerequisite of the application to the Trustees is that proposal must meet NEPA requirements. NEPA and MEPA require an alternatives analysis evaluation as part of the Environmental Notification Form (under MEPA). Alternatives considered in the report include full dam removal and sediment removal (A-1), partial sediment removal and dam removal (A-2), constructed riffles at an 1:20 slope (B-1) and an 1:30 slope (B-2) and a “do-nothing” or dam repair alternative. Other alternatives also considered at this site were partial breaches and fish ladders. These alternatives were discarded by the project team as not meeting holistic ecological restoration goals and are not highlighted in the Kleinschmidt reports.

The project team (as well as the review team) agrees that full dam removal with proper sediment management is the team’s preferred approach as rock ramps, although technically feasible and successfully implemented in the Northeast, are less ecologically beneficial than full dam removal.

#### *Criterion B2*

As for technical proficiency of the project team, Riverways is the only Massachusetts agency that has successfully conducted dam removals. Riverways has been involved in all of the Commonwealth’s dam removal projects for pro-active habitat benefit. Riverways facilitated the first dam breach in Dalton on the Housatonic River and, since the Dalton project, has directly assisted in four other dam removals including two in the last six months under the Priority Project Program. **It must be restated that the Mill Street Dam Removal has been assigned as a Priority Project and is currently receiving financial backing, technical assistance and project management services from Riverways staff.** Riverways staff includes a fluvial geomorphologist/engineer, a river restoration planner/project manager, support staff and pre-qualified dam removal and river continuity engineers retained on a master service agreement with the state. Of the many possible small dam removal projects across the state, the Commonwealth clearly has a strong interest in this particular project.

#### *Criterion B3*

Although it is unclear from the evaluation it appears that the project was penalized for potential adverse impacts for the dam removal component of the project. The existing condition, in which a large amount of contaminated sediment is retained behind a dam listed in poor condition, is not a beneficial situation for the watershed. This project seeks to remedy and address sediment management pro-actively and under a strict regulatory framework. **It should be noted that the DCR’s Office of Dam Safety is on record as recommending removal as an option at this site.**

#### **Criterion D3, D6 and D7**

The dam owner and local community groups are in support of this project. Support letters from multiple groups were obtained and the following groups also supported the project during the nomination of the dam removal for Riverways Priority Project Status:

- Berkshire Regional Planning Commission
- Kenneth Nash (dam owner)
- Berkshire Environmental Action Team
- Housatonic Valley Association
- Daniel Bianchi (Ward Councilor)
- City of Pittsfield

#### *Additional Comments*

In the initial proposal a due diligence approach for determining the source of contaminated sediments was discussed and the proposal included conducting a sophisticated Polychlorinated Biphenyl (PCB) congener analysis for fingerprinting PCB sources. Since the proposal was submitted to the Trustees sediment quality results from the impounded sediments have been shared with Massachusetts Department of Environmental Protection to commence this process.

*Scoring*

- The total score should be adjusted from 196 to 197 because of a mathematical mistake (average of three scores) under A.1.
- If the Dam Removal Feasibility Study produced by Kleinshmidt was not evaluated in the evaluation review scores should be adjusted for A-3, A-4, A-6, A-7, B-1-6 and C 1-5. If the report was considered in the review this should be acknowledged by the Trustees.
- Under Criterion C-5 it appears that a reviewer positively viewed coordination and integration with future remediation and response yet scores in this category (A-7) are consistently low and don't seem to reflect this positive comment.
- B-3 should be re-evaluated if the status-quo or existing condition was not properly considered or understood.
- B-2 and B-6 should be re-evaluated in light of comments under Criterion B-2 above.

The project team again thanks the Trustees for considering these comments. We look forward to your favorable endorsement of this important environmental restoration proejct.

Sincerely,

James McGrath  
City of Pittsfield

Tim Purinton  
Riverways Program

CC: Tom Matuszko, BRPC

