

Housatonic River Initiative  
Box 321  
Lenoxdale, Ma 01242

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Housatonic NRD Fund  
Woodlot Alternatives  
30 Park Drive  
Topsham, Maine 04086

Re: comments on evaluation summary

- 1) The HRI proposal is the only grant making an attempt to monitor the effects of remediation and “natural recovery” of the river. The Institute would provide one way to be able to monitor and quantify the recovery of the river and its ecosystem from the PCB problem. We are puzzled by the statement that the reviewers cannot agree on what “natural recovery period” means..

HRI has been the only group willing to monitor, study, and carry out a public information campaign about the PCB problem. We think it is extremely important that the total picture of the Housatonic’s recovery from PCBs be monitored far into the future. This includes recovery from the remediation and natural recovery.

- 2) The synergy of the project is the River Institute. The Institute has the potential to bring the public, students, academic and scientific community, sportsmen and women, environmental advocates, and river lovers to work collectively together.
- 3) “Two reviewers lowered scores based upon the discussion that utilization of the University lab alone would give them a high score.” This statement is also very puzzling. The intentional partnering with the University and its staff is why the lab and the Institutes Programs would more likely be successful by using state of the art equipment, staff already familiar with its use and techniques on how to sample effectively without negative impacts.
- 4) Specific techniques and tests to be applied were not adequately addressed. The specific tests and techniques would come about in two ways . As stated students of higher learning would make proposals to the expert advisor group. The expert group would also oversee the development of testing protocols to monitor future recovery. The reviewers seem to indicate that the panel of scientists who have agreed to oversee this project are not up to this task. Some have been directly involved in the EPA risk assessments and modeling projects on the river. Some have served on presidential panels in their respected fields. Another is one of the most published PCB researchers in the world. And others are professors at our local colleges with many years of study on the Housatonic. Specific techniques,

tests, and student proposals were to be decided by this expert panel. Surely they have the expertise to develop techniques and tests that are “appropriate and directed to the Housatonic River protection and clean up”.

- 5) “Two reviewers lowered score after a third reviewer pointed out the lack of details on the techniques left some doubt as to whether the tests performed could have a negative impact on the watershed by physically damaging sensitive areas during collection of samples.”. Again the expert review team that has agreed to oversee this grant have decades of experience and would certainly have a goal of no adverse impacts.
- 6) The review team indicated it was unclear whether additional testing outside of what the EPA and DEP was needed. The EPA will not be here to monitor the recovery of the river. This statement also shows a lack of understanding about the complexity of the Pittsfield / Housatonic river site and the role of HRI in achieving the PCB clean up. Through the decade long struggle to clean up our community HRI had to advocate dozens and dozens of times to get the EPA and DEP to sample areas that the public was led to believe were not contaminated. Many of these requests resulted in discovery of dozens of PCB sites. This included several barrel fields, many areas of residential contamination, school yard contamination, etc. If the citizens, through HRI, did not advocate with the EPA and DEP to “go the extra mile” a lot of areas of contamination would have been missed. There has always been the need for additional sampling at this site.
- 7) “Part of the review team felt this proposal quality and detail did not live up to the reputation of the Riverkeeper Program”. HRI is a Riverkeeper program. We were invited for review by Waterkeeper Alliance President, Mr. Robert Kennedy Jr., when he became aware of HRI accomplishments on the Housatonic River. We are reviewed annually by the Waterkeeper Alliance Board of Directors and have continually been granted our Riverkeeper License. This proposal is just one more tool to help our river. The monetary request is a small allocation to support our already existing program. All Riverkeeper programs are not the same but to use this as a point for judging our grant proposal seems unfair. Our Riverkeeper license and whether we live up to the name is judged by our parent organization.

Sincerely,

Tim Gray  
Housatonic Riverkeeper