

## **Housatonic River Natural Resource Damages Fund Summary of Round 4 Threshold Criteria Evaluation**

The Grant Announcement and Application (GAA) for Housatonic River Natural Resource Damages Fund Round 4 Restoration Projects Proposals was released on August 6, 2018, and the response deadline for applications was October 1, 2018. Ten Grant Applications were received by the Massachusetts SubCouncil (MA SubCouncil) of the Housatonic River Natural Resource Trustees on or before the stated response deadline.

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and Natural Resource Damages (NRD) regulations require that restoration activities restore, rehabilitate, replace, or acquire the equivalent of the resources and services that were injured or lost, but do not address which restoration projects are preferred. The Housatonic River Watershed Natural Resource Damages Assessment Restoration Project Selection Procedure (RPSP) describes a Threshold Criteria evaluation as Phase 1 of evaluation of proposed restoration projects. The Threshold Criteria are identified in the RPSP and summarized in the Round 4 GAA.

The Threshold Criteria evaluation is conducted by the MA SubCouncil to identify Grant Applications that meet minimum eligibility requirements for consideration as restoration projects. The Threshold Criteria evaluation assesses Grant Application completeness and consistency with the goals of the MA SubCouncil and applicable federal, state, and local regulations and laws. Grant Applications that are determined by the MA SubCouncil to meet the Threshold Criteria are termed "Project Applications" and are eligible to advance to Phase 2 of evaluation as described in the RPSP and GAA.

The MA SubCouncil received ten Grant Applications in response to the Round 4 GAA and conducted Threshold Criteria evaluations in October of 2018. The MA SubCouncil determined that each of the ten Grant Applications received by the MA SubCouncil met the Threshold Criteria and were therefore eligible to proceed to the next stage of evaluation.

The following sections of this document summarize the Threshold Criteria and the results of the MA SubCouncil's Threshold Criteria evaluation of Round 4 Grant Applications.<sup>1</sup>

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<sup>1</sup> In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for land acquisition Grant Applications is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and after funded land acquisition projects have closed.

## **Threshold Criteria**

The Threshold Criteria, as identified in the RPSP and summarized in the Round 4 GAA are as follows:

- 1. Does the application contain the information necessary to proceed with an evaluation as described in the RPSP?**  
(Answer must be "YES" to pass.)
- 2. Does the proposed project restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances?**  
(Answer must be "YES" to pass.)
- 3. Is the proposed project, or any portion of the proposed project, an action that is presently required under other federal, state, or local law?**  
(The answer must be "NO" to pass.)
- 4. Is the proposed project, or any portion of the proposed project, inconsistent with federal, state, or local law, regulation, or policy?**  
(The answer must be "NO" to pass.)
- 5. Will the proposed project, in terms of cost, be consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories?**  
(The answer must be "YES" to pass.)
- 6. Will the proposed project, or any portion of the proposed project, be inconsistent with any ongoing or anticipated remedial actions (i.e., primary restoration) in the Housatonic River watershed?**  
(The answer must be "NO" to pass.)

Additional information regarding application of the Threshold Criteria may be found in the RPSP.

## **Summary of Threshold Criteria Evaluation of Round 4 Grant Applications**

The following sections of this document summarize the MA SubCouncil's Threshold Criteria evaluation of the ten Round 4 Grant Applications received on or prior to the Grant Application deadline. Each project abstract is presented as it was provided by the Applicant in the Grant Application and is followed by a summary of the results of the MA SubCouncil's Threshold Criteria evaluation.

**Project Name:** Japanese Knotweed Control Along the Housatonic River  
**Application No:** 401  
**Project Applicant:** Native Habitat Restoration LLC  
**NRD Funding Requested:** \$230,978

**Abstract Submitted By Applicant**

*The goal of the Japanese Knotweed Control along the Housatonic River project is to improve the condition and integrity of critical riparian buffers of the Housatonic River as well as floodplain forests, early successional habitats and lowland forests. This project spans both sides of 2.9 miles of the Housatonic River with 10 landowners participating in including the National Park Service, Commonwealth of Massachusetts, Great Barrington Land Conservancy, Sheffield Land Trust. Town of Great Barrington, the Sheffield Chapel and private landowners. Using proven effective methods of Japanese Knotweed (*Polygonum cuspidatum*) treatment, we will reduce Japanese Knotweed cover to less than 5% by 2023.*

*This project will improve the health, structure and long-term integrity of these important habitats which in turn support the rare and endangered plant and animal species as well as many more common ones. Enhancing the wildlife habitat and aesthetics of these highly visible and visited areas will benefit the recreational activities by land and water.*

*This three-year \$212,278 project seeks \$203,978 in funding support from the Natural Resources Damages Fund.*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

**Project Name:** Churchill Brook Culvert Replacement  
**Application No:** 402  
**Project Applicant:** Housatonic Valley Association, Inc.  
**NRD Funding Requested:** \$200,000

**Abstract Submitted By Applicant**

*The Housatonic Valley Association is seeking funding to replace the second of two barrier culverts on Churchill Brook in Pittsfield, MA; a designated high-quality cold-water fisheries resource. This replacement will complete the restoration of stream connectivity on Churchill Brook, which will reconnect three miles of unconstructive fish passage, and allow storm water to pass safely under Churchill Street.*

*With Round 2 NRD funding, HVA assessed the continuity effectiveness of road-stream crossings in the upper Housatonic Watershed. These assessments were inputted in the UMass CAP Map program which identified these Churchill Brook culverts as high priorities for beneficial habitat restoration projects. Out of 1,162 structures assessed, these two culverts ranked in the top 25.*

*The Round 2 grant project allowed us to hire Foresight Land Services to design open sided replacement culverts following the new state stream crossing standards for both culvert locations. We also acquired construction permits for these culvert projects.*

*Along with our partners, Ma. NRD Trustees, BEAT, TU, City of Pittsfield, we replaced the downstream culvert located on Hancock Road. We now want to replace the second culvert to open up the entire riverway.*

*Since we already have a replacement design for this Churchill Street culvert, costs are greatly reduced. Estimates for this culvert replacement costs are \$753,608. We request \$200,000 from NRD, and will acquire the remaining amount from other sources such as the City of Pittsfield, MEMA Hazard Mitigation Assistance Program, MA DER, National Fisheries and Wildlife Foundation, and Ma/RI Council Trout Unlimited.*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

**Project Name:** Land Protection Project #1 [Project Name withheld]

**Application No:** 403

**Project Applicant:** [Applicant Name withheld]

**NRD Funding Requested:** \$171,080

**Abstract Submitted By Applicant**

*[In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for this application is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and funded land protection projects have closed.]*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

**Project Name:** Land Protection Project #2 [Project Name withheld]

**Application No:** 404

**Project Applicant:** [Applicant Name withheld]

**NRD Funding Requested:** \$145,000

**Abstract Submitted By Applicant**

*[In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for this application is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and funded land protection projects have closed.]*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

**Project Name:** Calcareous Fen Restoration  
**Application No:** 405  
**Project Applicant:** MA Division of Fisheries and Wildlife  
**NRD Funding Requested:** \$290,000

**Abstract Submitted By Applicant**

*This project will restore approximately 1,380-acres associated with five of the most ecologically significant calcareous wetlands in the Housatonic River Watershed: Jug End Fen, Schenob Brook, Agawam Lake, Kampoosa Bog and Fairfield Brook. These wetlands are comprised of calcareous fen natural communities supporting a suite of some of the region's most specialized and imperiled species. Field surveys carried out by The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (NHESP) with earlier support from the Natural Resource Damage Assessment and Restoration Program (NRDAR) have dramatically improved our understanding of the ecological importance of these wetlands, but also highlighted the need for further action to restore these wetlands and address threats. This proposal seeks funding to: (1) perform needed restoration actions such as the controlling invasive species, reintroducing natural disturbance agents such as prescribed fire, and repairing altered hydrology; (2) conduct hydrologic assessment to guide the repair of altered hydrology; and (3) support the long-term ability to maintain these natural communities once the initial restoration goals have been achieved. The proposed restoration actions will be completed within 4 years at a cost of \$350,000, including \$60,000 in committed cash and in-kind contributions from NHESP. This NHESP-led project will support the conservation efforts of the Kampoosa Stewardship Committee and The Nature Conservancy who have ownership and management interests at these sites.*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

**Project Name:** Land Protection Project #3 [Project Name withheld]

**Application No:** 406

**Project Applicant:** [Applicant Name withheld]

**NRD Funding Requested:** \$110,100

**Abstract Submitted By Applicant**

*[In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for this application is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and funded land protection projects have closed.]*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

**Project Name:** Alford Springs Culvert Improvement Project

**Application No:** 407

**Project Applicant:** Berkshire Natural Resources Council

**NRD Funding Requested:** \$196,300

**Abstract Submitted By Applicant**

*Berkshire Natural Resources Council seeks to replace and upgrade three culverts at its Alford Springs reserve to Massachusetts Stream Crossing Standards. The selected culverts are a high priority for replacement due to the importance of the tributaries they cross, their current physical conditions, and by the potential to lose maintenance and recreation access to the property. This large conserved parcel (+/-898 acres) is part of a block of over 13,000 acres of protected land, and is part of the Green River sub-watershed, a major tributary of the Housatonic River.*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

**Project Name:** Housatonic River Watershed Education Programs

**Application No:** 408

**Project Applicant:** Massachusetts Audubon Society, Inc.

**NRD Funding Requested:** \$441,338

**Abstract Submitted By Applicant**

*Over 3 years beginning in August 2019, Mass Audubon will partner with Housatonic Valley Association to create and deliver new Housatonic River Watershed Education Programs, building on Mass Audubon's previously NRD-funded "Housatonic Environmental Literacy Program (HELP) for the River". The new programs will include river and watershed education, river-based recreation, and riparian habitat stewardship opportunities for schools and communities of the Upper Housatonic River Valley. The ultimate aim of this project is for residents of the Upper Housatonic River Valley to be informed citizens with the knowledge and motivation to restore and protect the health of the Housatonic River and its watershed for current and future generations. This project will reach approximately 4,675 people across the entire Upper Housatonic River Watershed, including students in four grades and the general public (families, adults, residents, and visitors).*

*The project tasks are 1) Project Management and Coordination; 2) Environmental Education Programs for Elementary and Middle Schools; 3) Community Education and Stewardship Programs; 4) Nature Education Camp Feasibility Study and Pilot at Canoe Meadows Wildlife Sanctuary; and 5) Monitoring and Evaluation. The project design strategically integrates school and community approaches with place-based learning to engage participants of all ages in a way that teaches, inspires, and builds a new generation of watershed stewards. A professionally guided program evaluation will result in quantified metrics of the effect of the programs on participants' knowledge, attitudes, and behavioral intentions. Mass Audubon requests \$441,338 from the NRD Fund and will provide a match of \$188,239.*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

**Project Name:** Land Protection Project #4 [Project Name withheld]

**Application No:** 409

**Project Applicant:** [Applicant Name withheld]

**NRD Funding Requested:** \$286,000<sup>2</sup>

**Abstract Submitted By Applicant**

*[In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for this application is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and funded land protection projects have closed.]*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.

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<sup>2</sup> The abstract states that \$275,000 is requested; however, the Project Budget Summary Form submitted with the application states that \$286,000 is requested.

**Project Name:** Planning for Flood Resilient and Fish Friendly Road-Stream Crossings in the Berkshire Hills

**Application No:** 410

**Project Applicant:** Housatonic Valley Association, Inc.

**NRD Funding Requested:** \$125,675

**Abstract Submitted By Applicant**

*The Berkshire region of Massachusetts (MA) is home to high-quality headwater streams. Road-stream crossings that are undersized or designed in a way that does not account for stream geomorphology may act as barriers to the movement of aquatic species and be more likely to fail in a storm event. NRD Round 4 funds will be used to develop Preliminary Designs for culvert replacement projects that demonstrate Stream Simulation Design and meet the MA Stream Crossing Design Standards in five Berkshire towns. Demonstration projects will be identified through a comprehensive, town-scale road-stream crossing management planning process (to be completed with funding from the 2018 Round of the National Fish and Wildlife Foundation's New England Forests and Rivers Fund). The Management Planning process is designed to: 1) Identify highest priority replacement projects based on conservation value, flood risk and maintenance need; 2) Show communities that the same design practices that restore stream habitat continuity also reduce flood risk and maintenance costs; 3) Create a new tool for securing financing for replacement projects, and 4) Build local capacity to complete replacement projects that meet the MA Stream Crossing Design Standards. Given the large number of barrier culverts in the Berkshires, this kind of local capacity-building is essential to comprehensively restoring aquatic habitat continuity across the region. Demonstration Preliminary Designs, including cost estimates and implementation strategies, will be included in each town's final Management Plan, and represent an essential step between assessment/prioritization and implementation. This work will build on HVA's successful road-stream crossing assessment and replacement planning program, which was developed with significant support from NRD Round 2 funding.*

**Results of the MA SubCouncil's Threshold Criteria Evaluation**

The MA SubCouncil determined that this Grant Application meets the Threshold Criteria described in the RPSP and summarized in the Round 4 GAA. Specifically, the application appears to contain the information necessary to proceed with an evaluation (Threshold Criteria #1), and it appears that the proposed project:

- Would restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances (Threshold Criteria #2);
- Is not an action that is presently required under other federal, state, or local law (Threshold Criteria #3);
- Is consistent with federal, state, and local laws, regulations, and policies (Threshold Criteria #4);
- In terms of cost, is consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories (Threshold Criteria #5); and
- Is not inconsistent with any ongoing or anticipated remedial actions in the Housatonic River watershed (Threshold Criteria #6).

Therefore, the MA SubCouncil has determined that the proposed project is eligible for consideration as a Project Application.