

**Public Input received after the deadline on  
General Electric's Revised On-Site and Off-Site  
Transportation and Disposal Plan, dated  
October 15, 2024**

**January 16 - 20, 2025**



BERKSHIRE ENVIRONMENTAL ACTION TEAM  
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Protecting the environment for wildlife in support of the natural world that sustains us all.

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January 20, 2025

EPA via email at R1Housatonic@epa.gov

Re: GE's Revised On-Site and Off-Site Transportation and Disposal Plan

Berkshire Environmental Action Team (BEAT) appreciates this opportunity to provide feedback on the General Electric Company's (GE's) Revised On-Site and Off-Site Transportation and Disposal Plan. We apologize for being several days late.

BEAT is asking EPA to require GE to protect us from extreme storm flows and benefit our native wildlife when GE upgrades the transportation infrastructure to be able to transport PCB contaminated material.

1. We ask that GE be required to work with the state to upgrade the stretch of railroad along the Housatonic River to both safely transport the PCB contaminated materials and also restore stream flow and aquatic passage at all the railroad stream crossings.
2. We ask that GE be required to upgrade the stream crossing that carries Mill Brook under Roaring Brook Road in Lenox as part of their plan to "recondition and upgrade" Roaring Brook Road.

BEAT's mission is to work with our community to protect the environment for wildlife in support of the natural world that sustains us all. BEAT has worked with many, many partners for more than 15 years on assessing locations where our transportation infrastructure crosses rivers and streams. BEAT has worked on assessing infrastructure stream crossings with the University of Massachusetts which houses the North Atlantic Aquatic Connectivity Collaborative database that contains all the data on not just the stream crossings in the Berkshires, but the data for Massachusetts and 12 other states. We are part of the Berkshire Clean, Cold, and Connected partnership lead by the Housatonic Valley Association (HVA) with a grant from the Massachusetts Department of Environmental Protection striving to keep or restore our streams to being clean, cold, and connected. And we are part of the Berkshire Wildlife Linkages and larger Staying Connected Initiative led by The Nature Conservancy. In 2023, BEAT received the Stewardship Award from the International Conference on Ecology and Transportation.

Infrastructure stream crossings can have as big an impact on aquatic life movement as dams if they are undersized or poorly designed. In the past, little thought was given to properly sizing

culverts (pipes under the road or railroad) for passing the largest flows of stormwater. Additionally, through the years, we have added a tremendous amount of impervious surface to our landscape - usually directing all the water off the surface to the closest stream or river. This means that when we do have a storm, much more water flows immediately to the river or stream without sinking into the ground, and much of that water arrives at the same time, increasing the peak flow. Add to that, the increased intensity of our storms due to climate disruption and we are seeing more impacts from these peak flows often overtopping transportation infrastructure or washing crossings away altogether.

To replace poor stream crossings with better ones, it is often necessary to start with the crossing farthest downstream to not impact other crossings on the same stream. That is why it is so important to address the Roaring Brook Road stream crossings as well as all the railroad stream crossings - no matter how small - along the Housatonic river. This is where we start to restore the entire watershed of each stream.

### **The Railroad**

It is critical to ensure that as the railroad along the Housatonic River is upgraded to safely transport PCB contaminated sediments and soils, the upgrade should include improving all the stream crossings to be open-bottomed and span at least 1.2 times the real bankful width of the stream - even if the stream appears tiny. Many of the streams in Lenoxdale once supported plentiful Brook Trout populations. It seems impossible now that the railroad put in undersized culverts closest to the river, and roads compounded that mistake, and then individual property owners were allowed to put in undersized culverts for their private driveways. To remedy this situation, we have to start with the crossings closest to the river - the railroad crossings. Requiring the railroad to make improvements is nearly impossible most of the time, but now we have a huge opportunity. The state owns this stretch of railroad, and the state Department of Transportation (MassDOT) has been a fantastic partner on improving stream crossings on roads. This is a once in a lifetime opportunity to start remediating these tiny streams that are so important to our native fish. Please, require GE to work with the state to upgrade this stretch of railroad to both safely transport the contaminated materials and also restore aquatic passage at all the stream crossings.

### **Roaring Brook Road over Mill Brook**

BEAT at the Housatonic Valley Association have surveyed this crossing multiple times. On one occasion, the water was low and we could see numerous Brook Trout downstream of the crossing that could not travel upstream. The water in the culvert was far too shallow. The trout were stuck in warm water when, if they could have travelled up stream, they could have found cold refugia to shelter in. Mill Brook is a cold water stream that should stay cool to cold even as our temperature rises, especially if we can restore the Mill Brook watershed from the Farnham Reservoir all the way to the Housatonic River. To start this restoration, we need to start with the crossing closest to the Housatonic River at Roaring Brook Road.

Massachusetts has excellent River and Stream Crossing Standards for new crossings that require a crossing that a fish would not notice other than passing through a shadow. The crossing should be open-bottomed, meaning the substrate of the stream is the same through the crossing. The crossing should not restrict the flow of water even during the largest storms. And when the flows are normal, there should be dry passage on at least one side of the crossing for terrestrial wildlife to pass safely under the road. The City of Pittsfield, HVA, and BEAT replaced two crossings on Churchill Brook in Pittsfield to meet these standards and this example has been incredibly successful with a full range of wildlife - from Brook Trout up to deer - have been documented crossing safely under the roads.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jane Winn". The signature is fluid and cursive, with the first name "Jane" and the last name "Winn" clearly distinguishable.

Jane Winn, Executive Director

**From:** [holly l. harmon](#)  
**To:** [R1Housatonic](#)  
**Subject:** More Harm Than Good  
**Date:** Thursday, January 16, 2025 1:46:10 PM

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**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern:

Be advised the plan to invade Housatonic, MA with loud trucks and trains, carrying toxic material, running thru the center of the village, 24/7 is criminal. It will be, to say the least, unhealthy. How can you not see that? Would you like to live here with a train rattling your windows all hours of the night and noisy heavy trucks only feet away from *your* home?

We are not expendable. Our lives matter. Let the (heavy) PCB's lie where they are, sinking further into the silt. Do not dredge them up. You'll be making a bad situation even worse.

Penalize GE by requiring they spend the like amount of money to enhance the landscapes along the river instead of stirring up the toxin.

Respectfully,

*holly*

A black rectangular redaction box covering the signature area.

**From:** [Jmsgarzon](#)  
**To:** [R1Housatonic](#)  
**Subject:** Housatonic Rest of River - GE  
**Date:** Thursday, January 16, 2025 9:15:22 PM

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*To whom it may concern,*

*I find it unfathomable that the village of Housatonic, MA, has to put up with hundreds of trucks carrying toxic waste through the center of town, as well as with noise pollution 24/7. This will adversely affect our quality of life and our health.*

*There has to be somewhere else in Berkshire County with less intrusion that can tolerate this upheaval without impacting its residents. We say NO to GE's plan to use Housatonic as one of its staging areas.*

*Sincerely, James Garzon*

██████████ *Great Barrington, MA* ██████████

**From:** [Sherri Waggoner](#)  
**To:** [R1Housatonic](#)  
**Subject:** Clean Up the Water for this Community  
**Date:** Monday, January 20, 2025 6:03:18 AM

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**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern, I find it quite disgusting that the quiet little village of Housatonic, MA, has to put up with hundreds of trucks carrying toxic waste through the center of town, as well as having to put up with noise pollution 24/7. There has to be somewhere else in Berkshire County that can tolerate this intrusion without impacting its residents. I say NO to GE's plan to use Housatonic as one of its staging areas.

Sherri Waggoner

