

**Public Input on General Electric's
Vernal Pool Pilot Study Supplemental Information Package
for Reach 5A, dated June 19, 2026**

June 2026 - August 2026

Public input on Section 3 (mobilization and site preparation activities)
ended on July 10, 2026

Public input for remainder of document ended on July 31, 2026

From: [Madden, Andrew \(FWE\)](#)
To: [Fontaine, Joshua](#); [R1Housatonic](#)
Cc: [MAHousatonicSF \(FWE\)](#)
Subject: MassWildlife Comments on Section 3 of the Reach 5A Vernal Pool Pilot Study Supplemental Information Package (SIP)
Date: Monday, July 13, 2026 11:23:22 AM
Attachments: [20260713 DFW comments on Section 3 of VP pilot study SIP.pdf](#)

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Thank you for the opportunity to comment on Section 3 of the ***Reach 5A Vernal Pool Pilot Study Supplemental Information Package (SIP)***. Comments from the Division of Fisheries and Wildlife are attached. Please reach out if you have any questions.

Andrew Madden

Western District Supervisor

Massachusetts Division of Fisheries & Wildlife

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DIVISION OF FISHERIES & WILDLIFE

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MASS.GOV/MASSWILDLIFE

July 13, 2026

Josh Fontaine
EPA New England, Region I
5 Post Office Square
Boston, MA 02109-3912

Submitted via email to: Fontaine.Joshua@epa.gov and R1Housatonic@epa.gov

Re: Division comments on Section 3 (Mobilization and Site Preparation Plan) of the Vernal Pool Pilot Study Supplemental Information Package

The Massachusetts Division of Fisheries and Wildlife (Division) is responsible for the conservation of freshwater fish and wildlife in the Commonwealth, including plants and animals state-listed as endangered, threatened or of special concern pursuant to the Massachusetts Endangered Species Act (MGL c. 131A) and its implementing regulations (321 CMR 10.00) (MESA). In fulfilling this role, the Division, through its Natural Heritage and Endangered Species Program, is responsible for administering the MESA as well as the certification of Vernal Pools pursuant to the Wetlands Protection Act Regulations (310 CMR 10.00) (WPA). The purpose of the MESA is to conserve and protect state-listed rare species and their habitats, and to provide a framework for review of projects or activities proposed within mapped Priority Habitat. The Division notes that MESA has been identified as an Applicable and Relevant or Appropriate Requirement (ARAR) by the Environmental Protection Agency (EPA) with respect to Rest of River (ROR) Remediation. To conserve and manage freshwater fish and wildlife resources for the benefit of the citizens of the Commonwealth, the Division also owns and manages over 240,000 acres of conservation land in Massachusetts. The Division manages and provides wildlife-dependent recreational opportunities for the public on Wildlife Management Areas (WMAs), including hunting, fishing and trapping. The Division has received and is in the process of reviewing the Vernal Pool Pilot Study Supplemental Information Package (SIP). In accordance with the request from EPA that reviewers comment first on Section 3 (Mobilization and Site Preparation Plan) of the SIP, we submit the following comments on that Section. The Division anticipates submitting comments on other Sections of the SIP prior to the July 31 public input deadline.

Section 3 lacks adequate description of how equipment and field personnel will be managed to prevent the spread of invasive species. Vernal pool and aquatic habitats are particularly vulnerable to

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introduction of aquatic invasives. Therefore, the Division recommends that EPA require GE to develop and implement an approved plan to minimize introduction and spread of invasive species. For example, construction equipment, reusable construction matting, vehicles, and field personnel gear should be free of invasive species prior to entering the work site. Prior to beginning work and transfer between sites, equipment/gear should be thoroughly washed, inspected, and if necessary disinfected to minimize potential spread invasive individuals, seeds, propagules, or fragments. To prevent additional spread of invasive plants, aggregate used for all road construction, including for temporary roads, should be certified weed-free and equipment washing stations equipped with a high-pressure washers with warm water capacity.

Section 3 outlines proposed support area, laydown, staging, and road layouts etc. in Figures 3-1,3-2, 3-3. However, the Division requests that the dimensions of those areas be provided so that the Division can assess potential impacts to state-listed species and their habitats. In addition, the Division requests notification when the surveys are complete so that it can inspect the locations prior to commencing clearing, particularly where work occurs on property managed by the Division. The Division also requests that restoration actions and goals for each area and roads be clearly developed and implemented in consultation with DFW.

Erosion control measures, particularly silt fencing, may create a barrier to movement of organisms to and from vernal pools and across the floodplain. The Division requests that the contractors consult with Division staff on the appropriate times to set up and remove silt fencing or other erosion controls, and on maintaining dispersal pathways to and from vernal pools during spring and summer migratory periods (e.g., March 1 to August 31) to the greatest extent possible. For example, pools should not be completely encircled with fencing during this period, but should leave regular gaps (i.e. every 25 to 50 ft) to allow passage of amphibians and other small animals.

The Division also requests that seed mixes should be comprised of seed from plants native to Massachusetts and mulch to be certified weed-free. Additionally, the Division requests that routine inspections of control measures be completed at least once weekly, especially during spring and summer, to check for wildlife entrapment and confirm that measures are maintained and functioning appropriately. Section 3 describes removal of trees less than 8 inches DBH in vernal pool areas where sediment removal will occur. The criteria used to make this decision is not adequately described in the Section. The Division suggests that efforts are made to preserve trees greater than 6 inches DBH where possible to protect pools from solar radiation and subsequent warming to the greatest extent possible.

The document seems to suggest that monitoring and screening prior to construction should only be completed for MESA-listed species found during the 2025 survey season. However, the specific purpose and goals of monitoring and screening actions are not described. Although the Division is supportive of ongoing monitoring efforts, we request an explanation of how these actions will be used to advance protection of state-listed species. The Division requests that monitoring and screening prior, during and post construction be completed for all species with mapped or otherwise suitable habitat within

impacted areas to account for annual and seasonal variability of animal movements and plant emergence.

The Division requests that incidental harm or killing of any state-listed species be reported to NHESP within 24 hours. However, harm to wood turtles should be reported immediately to allow for prompt veterinary care intervention. Additionally, relocation of state-listed plant species to appropriate habitat outside of the work area should be approved by the Division first.

Thank you for the opportunity to provide input on proposed actions detailed in Section 3 of the document. Please reach out to Andrew Madden, Western District Manager, at Andrew.Madden@mass.gov or Rebecca Quiñones, Conservation Science Program Manager, at Rebecca.Quinones@mass.gov with questions or requests for additional information.

Sincerely,

A handwritten signature in black ink, reading "Everose Schlüter". The signature is fluid and cursive, with the first name "Everose" and last name "Schlüter" clearly distinguishable.

Everose Schlüter, Ph.D.
Acting Director

From: [Christopher Brittain](#)
To: [R1Housatonic](#)
Cc: [Robert Jones](#)
Subject: Vernal Pool Pilot Study Comments
Date: Friday, June 26, 2026 12:45:05 PM

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Please see comments below from the Town of Lee:

The current vernal pool pilot remedy appropriately blends removal of contaminated sediments with amendment-based treatment using activated carbon/PAC, including SediMite™, sand/PAC application, and subsurface mixing, to reduce PCB bioavailability in these ecologically sensitive habitats. The Town of Lee is curious why EPA is not also requiring GE to test bioremediation—specifically PAC saturated with PCB-dechlorinating bacteria—as a complementary in-situ treatment that could further reduce long-term PCB bioaccumulation by degrading Aroclors and other chlorine-rich PCB congeners over time. Because PCBs in vernal pools are already strongly associated with organic carbon, the key question is whether additional activated-carbon amendments alone represent the best long-term investment, or whether combining carbon sequestration with microbial dechlorination would more effectively minimize future ecological exposure.

This question grounded in the uploaded GE Vernal Pool Pilot Study SIP, which states that the pilot is intended to evaluate both excavation/restoration and amendment-based approaches, including activated carbon, to inform the remedy for remaining vernal pools. By what logic has EPA excluded consideration of bioremediation as part of the pilot study?

R. Christopher Brittain, CAGS, MCA, AP
Town Administrator
Lee, Massachusetts
413-409-5976



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From: [Christopher Brittain](#)
To: [R1Housatonic](#)
Subject: Vernal Pool Comments
Date: Friday, July 31, 2026 7:36:39 AM

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

The Town of Lee supports the intent by EPA to have GE study remediation impacts on ecologically sensitive vernal pools. We understand that there are approximately 100 vernal pools in the remediation corridor, some of which contain extremely elevated PCP concentrations. We also understand that this three-year study is designed to assess treatment impacts on specific sensitive species. The selected treatments center on addition of activated carbon (e.g., Sedimite).

The Town of Lee feels the proposed study is possibly missing the target, and requests that EPA address two topics: the efficacy of carbon amendments and bioremediation.

The scientific premise for adding carbon is unclear. This is a study: what hypotheses are being tested? PCB is largely already adsorbed in the organic-rich soil/sediment in these vernal pools. Aqueous PCB activity is very low. Simply stated, this is not a water pollution problem; it is a sediment pollution problem. Without additional measures to drive desorption (e.g., chemical solvents, electrolysis), the efficacy of adding carbon to an already carbon-rich environment to lower or immobilize PCB concentrations is likely low. The Town of Lee requests an explanation, preferably supported by recent peer reviewed literature, that makes sense of this approach. We understand that the impact of carbon amendments on sensitive species is central to the experimental design. It is just not clear why such amendments are hypothesized to have an impact in the first place.

A larger concern: why is EPA not requiring GE to test bioremediation? Such testing is strongly recommended by peer reviewed literature (and GE's own public arguments from 30 years ago). If PCB concentrations remain high in the vernal pools - which is a reasonable assumption as carbon amendments accomplish little - then higher cost destruction and subsequent restoration of vernal pools is likely required. The Town requests an explanation as to why addition of PCB destroying bacteria are excluded from the study.

R. Christopher Brittain, CAGS, MCA, AP
Town Administrator
Lee, Massachusetts
413-409-5976



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From: [Jane Winn](#)
To: [R1Housatonic](#)
Cc: [Danek Burke, Lisa](#)
Subject: Vernal Pool Pilot Study SIP comments
Date: Tuesday, July 28, 2026 6:37:47 PM

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Hi all,

Good meeting tonight. Below are my comments. Please pass them on to Andrew Inglis as well. I don't seem to have his email address.

2026-07-28 Vernal Pool Pilot Study SIP meeting with EPA & GE

1.
As little tree removal as possible
2.
As little soil compaction in the uplands as possible
3.
No plastic in the erosion controls! Coir logs instead of straw waddles? Straw waddles must not have any plastic! Erosion control blankets must not have any plastic netting.
4.
Jane saw a spotted turtle - back in 1960s/70s - in one of the vernal pools in the study area.
5.
Obligate amphibians do not use "large woody debris" for attaching their eggs so much as branches with a diameter of 1" or less, dogwood or willow stems. It is fine to replace any large woody debris as well, but please provide enough small branches or dogwood/willow in the pools to attach eggs to.
6.
portable diesel generators - why specify diesel? Battery-powered?
7.
Vernal pools are detritus driven food webs. Can we devise a study that checks to see if the PCBs attached to the activated carbon is taken up in the food web? Bruce had an idea of doing a chemical assay looking at the macroinvertebrates post-remediation.

with gratitude,
Jane

--

Jane Whittlesey Winn, any pronouns

Environmental Good-troublemaker



From: [CPR Berkshire](#)
To: [R1Housatonic](#)
Cc: [Greg Sukiennik](#); [Leslee Bassman](#); [Judy Herkimer](#); [Judy Herkimer HEAL](#); [REDACTED]; [Kevin Farrar](#); [Valerie Andersen](#)
Subject: CPR comments for Vernal Pool Pilot Study
Date: Thursday, July 30, 2026 9:38:26 AM
Attachments: [Vernal Pool Pilot Study Comments by CPR.docx](#)

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Comments attached.

Citizens for PCB Removal
Charles Cianfarini
Interim Executive Director

July 30, 2026

Citizens for PCB Removal comments on

GE-Pittsfield/Housatonic River Site Rest of River (GECD850) Vernal Pool Pilot Study Supplemental Information Package

Charles Cianfarini, Citizens for PCB Removal (CPR) Interim Director

As I sit here preparing these comments, we are experiencing the first multi day rain events in several months here in Pittsfield and the Berkshires. Having attended the Open House last night, I regret not asking about what happens with the currently scheduled work should there be some extended weather issues. Looking ahead there could be some more significant rain events over the next few weeks. These will definitely affect the conditions to conduct proper completion of the work based on the proposed schedule.

CPR has several concerns about this Pilot Study. First of all is calling it a Pilot study where there are different methods of treatment being tested for different pools. This is especially troubling since there has already been a proven method of Vernal Pool treatment at this site a few years ago near Fred Garner Park. The work that was performed there resulted in a complete and successful restoration of that Vernal Pool. It did not require any “shortcuts” of using Activated Carbon either mixed with sand (PAC/sand) or Semite pellets. All future Vernal Pool work for Rest of River should be based on that treatment method.

Secondly, while there have been some studies of these alternative treatments of the use of Activated Carbon, the long-term effects are not truly known. The short-term results of either of these alternatives will not be able to provide a clear decision as to whether both, either or none of these processes will result in long-term health for these Vernal Pools. A decision of how to proceed with other Vernal Pools along Rest of River should not be based on what can be determined over a year or two of monitoring of these initial treatments. That is not good science for these vernal pools or Rest of River.

Lastly, there is no clear understanding or results of what long-term inclusion of how Activated Carbon will affect the environment. Nor is there an understanding of the implications of eventual degradation of either the activated carbon or the attached PCBs. The one thing we do know is that neither the activated carbon nor the PCBs will remain in their current state thru perpetuity. We also know that PCBs will slowly change state, degrade and can become even more toxic as they become PCB4. We also do not know if just because the PCB molecules attach to the activated carbon that they will not be ingested by the biota in the environment.

CPR believes that the use of Activated Carbon in Rest of River is not because it is good science, but a means to reduce the costs of a true remediation and removal of this toxin from our watershed. Cheap should not be the driving force behind a real clean and healthy environment for our communities and their children.

As example of why this is really a “study” is because there is no scientific evidence where activated carbon has been used in Vernal Pools but ONLY in wetland areas. Those are two very different environments.

This study should be limited to ONLY TWO (2) of the existing Vernal Pools using each of the alternative methods! NO decision of further use of activated carbon should be considered until at least TEN (10) years of follow-up monitoring, but preferably longer. A mistake now could result in a loss of all Vernal Pools in the watershed.

EPA stand up to General Electric and make them perform KNOWN treatment options for Vernal Pools!

Asking Google this question: *have vernal pools been treated with activated carbon*

Resulted in this response:

Activated Carbon Use in Vernal Pool Remediation

Yes – the current Vernal Pool Pilot Study in Pittsfield, MA, includes activated carbon as a potential treatment option, but it is being tested under controlled conditions and with extensive monitoring.

According to the U.S. Environmental Protection Agency's (EPA) conditional approval of General Electric's *Vernal Pool Pilot Study Work Plan*, the project is designed to evaluate methods for preserving amphibian habitats in the Housatonic River cleanup area semspub.epa.gov. The work plan explicitly allows for **the addition of activated carbon sources** during field-based pilot work, but only after careful evaluation of how this might affect water quality parameters such as pH, temperature, alkalinity, hardness, and dissolved oxygen semspub.epa.gov.

EPA requires that:

- **Bench-scale testing and field trials** measure these water quality characteristics before and after any activated carbon application.
- **Ecological effects** on species using the pools (including state-listed wood turtle and Jefferson salamander) must be monitored.
- **Dip net surveys** and macroinvertebrate assessments will track larval development and aquatic community health semspub.epa.gov.

This means activated carbon is **not yet a standard, widely applied treatment for vernal pools**, but it is part of a **pilot study** to determine its feasibility, safety, and ecological impact in this specific remediation context. The study is being conducted under EPA oversight, with public input and scheduled field work in 2023 [The Berkshire Edge+1](#).

In summary, **activated carbon has been considered and is being tested in the Pittsfield vernal pool pilot study, but it has not been broadly implemented as a routine vernal pool remediation method.** The results of this pilot will help decide whether such treatment could be adopted in the future.

Google then prompted the following addition to the question: *have vernal pools been treated with activated carbon in California*

Here is the result:

Activated Carbon Use in California Vernal Pool Restoration

Based on the available public information, **there is no evidence that vernal pools in California have been treated with activated carbon as a standard or documented restoration practice.**

What the sources show

- **Official recovery programs** such as the U.S. Fish and Wildlife Service's Vernal Pool Recovery Implementation Team focus on habitat protection, species monitoring, and coordination across California and southern Oregon, but do not list activated carbon treatment as a recovery action [U.S. Fish and Wildlife Service](#).
- **Conservation projects** like the Chaparral Lands Conservancy's vernal pool preservation and restoration work in San Diego and Proctor Valley emphasize habitat restoration, species protection, and removal of degradation sources (e.g., off-road vehicle impacts, invasive plants, trash) www.chaparralconservancy.org¹. These projects do not mention water treatment with activated carbon.
- **Mitigation and restoration evaluations** by firms such as Great Ecology for San Diego vernal pools involved biological surveys, conceptual basin designs, and coordination with agencies, but no activated carbon application is described [Great Ecology](#).
- **State and federal descriptions** of vernal pools note that habitat loss and degradation are primarily from development, agriculture, and altered hydrology, with restoration focused on hydrologic restoration, vegetation management, and species protection [California Department of Fish and Wildlife](#).

Why activated carbon is not used

Activated carbon is a water treatment medium used to remove dissolved contaminants, but vernal pools are ephemeral wetlands that naturally dry in summer and are not typically managed for continuous water quality treatment. Restoration efforts generally aim to restore natural hydrology, remove invasive species, and protect habitat rather than chemically treat pool water.

Conclusion

While activated carbon may be used in other wetland or water quality contexts, **the provided California vernal pool restoration records do not indicate any such treatment has been applied.** Current conservation work in California focuses on habitat restoration, species protection, and removal of degradation sources, not on activated carbon water treatment [U.S. Fish and Wildlife Service](#)⁴.

From: [CPR Berkshire](#)
To: [R1Housatonic](#)
Cc: [REDACTED]; [Judy Herkimer](#); [Judy Herkimer HEAL](#); [Kevin Farrar](#)
Subject: Fw: CPR comments for Vernal Pool Pilot Study
Date: Saturday, August 1, 2026 1:35:06 PM
Attachments: [Vernal Pool Pilot Study Comments by CPR, HRI, HEAL.docx](#)

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Please also accept these comments from both Housatonic River Initiative (HRI) and Housatonic Environmental Action League (HEAL). The document has been updated.

Citizens for PCB Removal
Charles Cianfarini
Interim Executive Director

From: CPR Berkshire <CPR-Berkshire@outlook.com>
Sent: Thursday, July 30, 2026 9:33 AM
To: EPA Public Input <r1housatonic@epa.gov>
Cc: Greg Sukiennik <gsukiennik@berkshireeagle.com>; Leslee Bassman <lesleebassman@gmail.com>; Judy Herkimer [REDACTED]; Judy Herkimer HEAL <healct@snet.net>; Tim Gray [REDACTED]; Kevin Farrar [REDACTED]; Valerie Andersen [REDACTED]
Subject: CPR comments for Vernal Pool Pilot Study

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Also attribute these comments to Housatonic River Initiative (HRI - Board Member)

and Housatonic Environmental Action League (HEAL – Board Member)

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