



John G. Haggard, Manager
Hudson River Program

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May 23, 2000

Peter deFur, Ph.D.
President
Environmental Stewardship Concepts
11223 Fox Meadow Drive
Richmond, VA 23233-2218

Re: Hudson River Ecological Risk Assessment

Dear Dr. deFur:

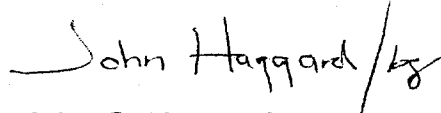
In addition to the previously submitted correspondence concerning the Hudson River Baseline Ecological Risk Assessment (BERA) peer review in which you are participating, I enclose for your consideration a brief report concerning Charge Question 8. Dr. Lawrence Barnthouse prepared the report, on behalf of the General Electric Company (GE), which addresses the availability and interpretation of data concerning the fish populations of the Hudson River estuary.

I am sending you this report because the objective assessment of all available data is fundamental to a technically sound and defensible ecological risk assessment. As summarized in the enclosed report, 24 years of continuous sampling data concerning the fish populations of the Hudson River estuary are available for evaluation by EPA. This data set is, by far, the most complete data set available for any estuarine fish community in the United States, and probably the world. These data are highly relevant to EPA's reassessment for the Hudson River and the BERA because they directly address the condition of the exposed populations in the Lower Hudson River. In its Responsiveness Summary, EPA dismissed these data as being confounded by changes in water quality and fisheries management that may have masked adverse effects caused by PCBs. This argument is wholly unsupportable. In fact, the observed status and trends of the estuary ecological resources provided by the 24-year data set are a better representation of potential ecological risks than are the results of highly uncertain predictive modeling exercises such as the Toxicity Quotients relied upon in EPA's ecological risk assessments for the Upper and Lower Hudson River.

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I hope that you will find the enclosed report informative as you complete the peer review process. If you have any questions, please contact Dr. Barnthouse (865-483-0100) or myself (518-862-2730).

Yours truly,

A handwritten signature in black ink, appearing to read "John Haggard" followed by a stylized flourish or initials.

John G. Haggard

JGH/bg

cc: Alison Hess, U.S. EPA
William McCabe, U.S. EPA
Douglas Tomchuk, U.S. EPA
Douglas Fischer, U.S. EPA (ORC)
Steven Sanford, NYDEC
Ron Sloan, NYDEC
Bob Montione, NYDOH
Tom Brosman, NOAA
Jay Field, NOAA
Sharon Shutler, NOAA
Lisa Rosman, NOAA (New York)