



## REGION 2

NEW YORK, N.Y. 10007

May 22, 2026

### MEMORANDUM

**SUBJECT:** EPA Region 2 Responses to CSTAG Recommendations on the Lower Hackensack River Superfund Site, OU2, Milestone 1 Review

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Date: 2026.05.22 12:45:07 -04'00'  
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**TO:** Karl Gustavson, Chair  
Contaminated Sediments Technical Advisory Group  
Office of Superfund and Emergency Management

This memorandum has been prepared to respond to recommendations from the Contaminated Sediments Technical Advisory Group (CSTAG), which were provided in the CSTAG memorandum, dated March 26, 2026, and titled "Recommendations on the Lower Hackensack River Superfund Site, milestone 1 review" (CSTAG Milestone 1 Recommendations Memo). The CSTAG Milestone 1 Recommendations Memo documents the group's recommendations following EPA Region 2's milestone 1 (site characterization) review meeting held at EPA Region 2's office in New York, NY on January 12-13, 2026.

EPA placed the Lower Hackensack River Superfund Site (Site) on the National Priorities List (NPL) in September 2022. Three operable units (OUs) have been identified thus far for the Site: OU1 is the extent of the Lower Hackensack River (LHR) from south of the Oradell Dam to near Newark Bay, spanning approximately 22 river miles (RMs); OU2 is within OU1 and generally extends from RM 2 to 5.5; and OU3 is generally located between RM 13 and 17, including Overpeck Creek up to the Degraw Avenue/Fort Lee Road bridge crossing.

The CSTAG milestone 1 review meeting was for an initial review of the Site management approach and planned targeted remedial investigation (TRI) in OU2, which includes OU1 baseline sampling. As noted in CSTAG's Milestone 1 Recommendations Memo, the milestone 1 review was conducted early in the Superfund remedial process, prior to the development of sampling plans for the OU2 TRI, which will include plans for baseline sampling in OU1, and the OU2 Focused Feasibility Study (FFS).



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## **CSTAG RECOMMENDATIONS**

### **1. Support for the Adaptive Site Management Framework**

CSTAG is encouraged by the LHR project team's commitment to an adaptive site management (ASM) strategy. It appears that the Region has been thorough and deliberate in targeting areas with the greatest potential need for remediation while developing ASM procedures to continue to gain knowledge of sitewide characteristics and the system's response to remediation. CSTAG supports the Region's efforts to build frequent evaluations into the project's Adaptive Site Management Plan (ASMP) to assess current efforts and to increase efficiency. To streamline this process, CSTAG recommends that the Region consider defining the structure of the ASMP updates to the extent possible, for example by specifying the timing, nature of decisions, type of inputs and evaluations, and sources of information to be used.

**Region 2 Response:** The Region agrees with CSTAG's recommendation to consider defining the structure of the ASMP updates, including specifying the timing, nature of decisions, types of inputs and evaluations and sources of information to be used. The LHR project team recognizes the importance of clarifying adaptive decision-making timeframes to further stakeholder understanding. The ASMP discusses that the plan should be reviewed regularly (e.g., once a year) to determine if new information should be incorporated. The ASMP additionally discusses that the timeframes and frequency of regular ASMP reviews will be further refined as information is gathered and progress is made towards final remediation goals (RGs). The LHR project team will continue its efforts to engage stakeholders on the ASM process and will further evaluate milestones such as the selection of any interim response action in a CERCLA decision document, which is one situation when updates to the ASMP may be appropriate.

### **2. Site Characterization Program and Timing**

If ASM is to be worthwhile, it will need to achieve its objective of expedited early actions. CSTAG recommends that the Region work with respondents to complete the TRI in as few stages as possible, and in a manner that can support the TRI, technology evaluation, and design objectives to the extent possible.

**Region 2 Response:** The Region agrees that early, expedited actions, which include interim response actions, are central to an ASM approach and will best support EPA's overall cleanup objectives at the Site.

The objectives of the OU2 TRI/FFS, as established in the OU2 TRI/FFS Administrative Settlement Agreement and Order on Consent (ASAOC), align with CSTAG's recommendations, specifically, that the OU2 TRI/FFS will delineate the nature and extent of contamination in OU2 and evaluate different interim remedial alternatives. The OU1 Site-wide baseline sampling will identify current conditions for the Site, which, together with the OU2 TRI/FFS, will inform the selection of an appropriate interim remedial alternative for OU2 that achieves significant risk reduction by addressing sources of contamination that present a risk to human health and the environment and/or potential to migrate within the Site. The OU2 TRI/FFS and OU1 baseline sampling will be conducted in a manner that ensures the collection of baseline data to characterize current conditions for the Site, and, as specified in Appendix C (Statement of Work, or SOW) of the OU2 ASAOC, facilitates development of the OU2 conceptual site model (CSM).

The Region will work closely with the OU2 ASAOC Respondents to ensure the OU2 TRI/FFS is comprehensive and designed to leverage data collection that informs multiple decisions, including:

- Source identification/delineation.
- Risk evaluation.
- Technology screening and evaluation for the FFS.
- Design considerations for any selected interim response action.
- Assessment of whether any implemented interim response action meets early action-specific cleanup goals.

To support scoping the forthcoming OU2 TRI Work Plan, the Region is currently reviewing the OU2 ASAOC Respondents' recently submitted Quality Assurance Project Plan (QAPP) for an expedited bathymetric/topographic survey throughout OU1 and field conditions assessment within OU2. The Respondents anticipate conducting this work in summer 2026 in advance of the remainder of the OU2 TRI sampling, which is expected in 2027.

The ASMP emphasizes initiating interim response actions at the Site early and, to the extent possible, concurrently, recognizing that any response actions can disturb the river and that time is needed for the system to stabilize so those actions can be effectively evaluated. The performance and outcomes of any implemented interim response actions will be evaluated as part of the Site-wide remedial investigation/feasibility study (RI/FS), which will include development of risk assessments and result in the selection of a final remedy with final, risk-based cleanup goals for the entire Site.

To maximize the Site-wide benefits of any implemented interim response actions, including facilitating earlier system recovery and enhancing the effectiveness of potential natural recovery mechanisms, the Region intends to:

- Implement a Site-wide baseline sampling program consisting of multiple rounds sufficient to establish baseline conditions and trends, to which any implemented interim response actions will be compared.
- Coordinate the construction of interim response actions, across OUs, concurrently to the extent practicable, so that data are comparable and trends can be interpreted consistently.

The Region has identified OU3 as another potential source area to the Site and will continue to evaluate and, as appropriate, define additional OUs. The Region anticipates that future enforcement instruments with potentially responsible parties for other OUs will include a Statement of Work for OU-specific targeted investigations as well as sequential sampling rounds as part of the Site-wide baseline investigation, providing opportunities for:

- Early identification and resolution of data gaps.
- Expedited collection of Site-wide data to evaluate trends that inform adaptive decision-making from implementation of interim response actions through selection of the final Site-wide remedy.

### **3. Site Characterization Sampling**

#### **3a. Sampling Design Recommendation**

CSTAG recommends that the Region consider employing an unbiased sampling approach (e.g., stratified random design) for baseline sampling where the design is informed by site characteristics such as sediment bed type, geomorphology, or other factors that influence contaminant level and variability. An unbiased design could also be included in the TRI for OU2 for hotspot delineation by incorporating different strata and higher sample densities in areas of interest. One advantage of this approach is that unbiased data sets can be combined to develop surface weighted average concentrations (SWACs) in various spatial areas of the site.

**Region 2 Response:** Careful consideration of the sampling design for the OU2 TRI and the associated Site-wide baseline investigation is important, and should, to the extent practicable, be aligned with anticipated early action-specific remedial action objectives (RAOs) and preliminary performance metrics (PPMs, discussed further below in Region 2's response to Recommendation 5) and final Site-wide RAOs and RGs. The specific sampling design for the OU2 TRI and the OU1 baseline investigation performed as part of the OU2 TRI scope will be defined in the forthcoming OU2 TRI Work Plan, which is expected by the end of 2026.

An unbiased sampling strategy may be appropriate for the OU1 baseline investigation and for portions of the OU2 TRI, particularly in areas of OU2 that have not been fully characterized through prior New Jersey Department of Environmental Protection (NJDEP) investigations. With respect to non-aqueous phase liquid (NAPL)/product delineation, a robust characterization in what is now part of OU2 was conducted under NJDEP authority. Some focused confirmation sampling may still be warranted to validate in-river data collected by Beazer East, Inc. (which is also one of the OU2 ASAO Respondents), as those data were not collected under an EPA-approved QAPP.

The specific unbiased approach (e.g., grid-based, random, generalized random tessellation stratified) will be selected based on the OU2 TRI objectives and decision needs. Stratification may be appropriate to differentiate discrete areas based on key characteristics. Potential stratification factors include the presence/absence of finer-grained sediments, habitat features, or known external source inputs, informed by currently available information and data from the upcoming expedited bathymetric/topographic survey and field conditions assessment. The potential suitability of targeted (biased/judgmental) sampling cannot be ruled out, given the need to expedite delineation of target remediation areas in OU2 and the opportunity to leverage the OU1 baseline investigation to characterize other areas of interest (e.g., other planned or potential OUs that may be appropriate for an early action).

It is anticipated that the OU2 TRI Work Plan will be structured to generate decision-quality data that can be leveraged to address both early action-specific RAOs and PPMs and Site-wide RAOs and RGs and will include appropriate data use objectives (DUOs)/data quality objectives (DQOs) and quality assurance/quality control elements (e.g., Sampling and Analysis Plan/QAPP).

#### **3b. Source Identification Recommendation**

CSTAG supports the Region's source identification objectives and recommends that sediment and water column sampling efforts include an assumption that not all likely source locations can be

identified *a priori*. The OU2 TRI work plan, which will include a minimum of one round of OU1 baseline sampling, should indicate which areas, including connected waterways and marshes, will be included or excluded in sampling, and provide a supporting rationale. Above, CSTAG provides a few approaches that the Region could consider for achieving source identification objectives.

**Region 2 Response:** The Region appreciates CSTAG's recommendation and agrees that investigations should proceed with the understanding that not all likely source locations can be identified *a priori*. The OU2 TRI will focus on identifying and delineating sources, including potential NAPL, that contribute to in-river contamination and can be addressed by achieving OU2 early action-specific RAOs and PPMs to support source control, prevent migration, and reduce risk and exposure.

The OU2 TRI Work Plan, which will include at least one round of OU1 baseline sampling, will specify the areas to be sampled (e.g., major tributaries, connected waterways, and marshes) and any areas to be excluded, with a clear rationale for those decisions. The OU2 TRI Work Plan will be structured to generate decision-quality data that inform multiple decisions, including source delineation, technology evaluation for the FFS, and the design and evaluation of interim remedial alternatives for OU2. A robust TRI is expected to fully define the target areas and the FFS will evaluate different interim remedial alternatives.

More broadly, the Site-wide OU1 baseline sampling program will be used to characterize other areas of interest, including other planned or potential OUs that may be appropriate for an early action. The sampling program may proceed iteratively to investigate suspected internal and external sources and as warranted, to extend characterization into adjacent wetlands, marshes, and tributaries based on and/or to inform the nature and extent of each OU.

The Region will also coordinate with related programmatic efforts (e.g., upland facility groundwater evaluations) and our counterparts at NJDEP to improve understanding of external contributions to in-river conditions. Similar, comprehensive TRI approaches are anticipated for OU3 and would be expected for any additional identified early action OUs, to ensure consistent, adaptive, and efficient source identification and control and early risk reduction across the Site.

### **3c. NAPL Recommendation**

NAPL deposits are a likely target for early actions with future remedial decisions based on the NAPL ARAR (Applicable or Relevant and Appropriate Requirements) interpretations, considerations of the physical and chemical stability of NAPL-impacted sediment, and toxicity of constituent PAHs within the bioactive zone. CSTAG recommends that the Region complete determinations on upland NAPL source connectivity and control, conduct evaluations to assess sediment stability and implications for potential NAPL transport, and plan for NAPL treatability testing for in-situ treatment (if in-situ approaches will be considered). A benthic preliminary remediation goal (PRG) for NAPL-related constituents derived from site-specific toxicity testing could also help circumvent potential disagreements on establishing benthic remediation goals.

**Region 2 Response:** The Region agrees that NAPL is a critical consideration for any interim or final response actions. For OU2 specifically, the nexus between upland and in-river NAPL will be assessed using the CSM, historical data from adjacent upland facilities, and data generated

during the OU2 TRI. The risk implications of NAPL at OU2 will be evaluated through the Ecological Risk Information Evaluation (ERIE) and the Human Health Risk Information Evaluation (HHRIE), which will be scoped in the OU2 TRI Work Plan.

The OU2 TRI will also evaluate sediment stability, both generally and as it relates to NAPL-impacted sediments, to identify source areas requiring remediation. The LHR project team anticipates that the OU2 ASAOC Respondents will want to evaluate the stability of NAPL (e.g., weathered state, mobility) as part of the OU2 TRI/FFS. The OU2 TRI/FFS SOW outlines ERIE expectations, including toxicity testing and comparison to toxicity benchmarks. For other areas with potential NAPL, the broader source-identification process described under CSTAG Recommendation #3b will be applied; likewise, the Region expects the TRI for OU3, and for any additional identified early action OU to address NAPL as a potential source and to evaluate sediment stability.

Consistent with the OU2 TRI/FFS ASAOC SOW, any necessary treatability testing will be conducted during the OU2 TRI/FFS to inform technology selection. With respect to performance metrics and goals, the OU2 ASAOC Respondents will develop PPMs that are appropriate for any proposed interim response action, which will be consistent with the Region's ASM strategy of documenting when early action-specific RAOs focused on reducing risk and source control have been met. While risk-based preliminary remediation goals (PRGs) will be developed under the Site-wide OU1 investigation and remedial design/remedial action phases, the Region is not proposing to establish constituent-level benthic PRGs specifically for the OU2 interim remedial action; rather, interim remedial action PPMs will guide implementation and evaluation of the OU2 interim remedial action, and final, risk-based goals will be developed and addressed as part of the Site-wide investigation and remedy implementation. The Region would expect an OU2 interim remedial action, and any other interim action for any other OU, to be compatible with a final remedy.

### **3d. Natural Recovery recommendation**

CSTAG recommends an early emphasis on collecting lines of evidence on Monitored Natural Recovery (MNR) trends and mechanisms to support future decision-making. It's anticipated that TRI and baseline sampling can be leveraged to ensure parameters, spatial coverage, and time intervals can also support natural recovery objectives.

Species selection and standardization of biological sampling will need to be carefully considered. CSTAG recommends that the Region monitor species that can reflect human and ecological risk and are closely linked to the site changes to the extent possible (or at least be clear if collected species are less suited for tracking site contamination). Isotopic tracers (e.g., light isotopes) could be considered to support species selection by increasing the understanding of their migration, habitat reliance, and primary areas of residence (e.g. within the river compared to the bay).

**Region 2 Response:** The Region agrees that placing early emphasis on data collection to support evaluations of natural recovery is important. The LHR project team anticipates, and the ASMP discusses, that MNR is likely to be considered in the development of a future final Site-wide remedy if, following implementation of interim response actions, residual risks remain and it can be demonstrated that risk mitigation can be achieved via MNR within a reasonable

timeframe. To that end, data collection during the OU2 and OU3 TRIs, the TRIs for any other OUs, the iterative OU1 baseline investigation, and the eventual OU1 RI/FS will support the collection of natural recovery-related lines of evidence, with the objective of generating decision-quality information on recovery trajectories to inform both interim and final remedy decisions.

The Region also agrees that careful consideration of species selection and standard biological sampling is essential. The LHR project team is currently working with the OU2 ASAOC Respondents to ensure the OU2 preliminary CSM (which is currently in development) appropriately captures relevant exposure pathways and receptor categories. During development of the OU2 TRI Work Plan, the Region will work with the Respondents to scope the ERIE and HHRIE, consistent with the OU2 TRI/FFS ASAOC SOW, including the biological sampling approaches and methods. Scoping for the OU2 TRI, the OU2 ERIE/HHRIE, and the OU1 baseline investigation is expected to incorporate species selection tailored to both area-specific objectives and broader Site-wide evaluations needed to understand system response and recovery. While migration studies could inform species selection, they may introduce phased investigations that could slow progress on the TRI/FFS and therefore implementation of an interim response action. The Region will weigh their value against the need for expedition. The program will leverage existing information from nearby NPL sites (e.g., Diamond Alkali, Ventron-Velsicol) and regional studies (e.g., Meadowlands Research & Restoration Institute fishery resource inventories) to inform target species and sampling designs.

Practically, biological sampling will be coordinated through the OU1 baseline sampling and OU2 TRI. Where feasible, a single field effort will be designed to meet both sets of objectives; otherwise, activities will be scoped to ensure the most suitable program captures the needed data. For example, OU2 TRI fish tissue sampling may emphasize resident species with smaller home ranges to reflect conditions within OU2, while the OU1 baseline program may include species that integrate conditions across broader river segments to inform Site-wide conditions and trends. The LHR project team will continue to discuss CSTAG's recommendations on species selection, including whether and when to incorporate tools such as isotopic tracer analyses. The Region anticipates conferring with its technical consultants to determine applicability and the appropriate program (OU1 baseline versus OU2 TRI) and timing for such methods.

### **3e. Sediment Stability Recommendation**

CSTAG recommends that the Region includes sediment stability evaluation objectives in its characterization efforts. The Sediment Erosion and Deposition Assessment (SEDA) methodology describes several lines of evidence and approaches to achieve those objectives. Repeated high resolution multibeam bathymetry has already proven useful at the site. Comprehensive survey areas and more intervals would further understanding of sediment stability and transport and support remedial technology evaluations. Determinations of likely future use including a U.S. Army Corps of Engineers (USACE) navigation needs analysis will also be essential to inform technology selection (and ARAR compliance).

**Region 2 Response:** The Region agrees that sediment stability is a critical consideration for the LHR ASM approach and an essential factor in identifying and prioritizing potential targeted early action areas. Sediment stability will be evaluated through the OU2 TRI (and the OU3 TRI and the

TRIs for any additional identified early action OUs), as well as through the iterative, Site-wide OU1 baseline investigation. Consistent with SEDA guidance, the OU2 TRI will consider the appropriate mix of methods, such as high-resolution bathymetric/topographic surveying, hydrodynamic assessments, geochronology, and, where warranted, critical shear testing (e.g., SEDFLUME), tailored to the decision needs of expedited early actions and, ultimately, the final Site-wide remedy.

Repeated rounds of bathymetry, whether implemented as part of a TRI or through iterative rounds of OU1 baseline sampling, could be used to evaluate sediment stability. The Region will avoid unnecessary phased investigations that could delay implementation of any early, expedited interim response actions, striving instead to collect sufficient stability information up front and reserving focused follow-up for design refinement and performance evaluation.

The LHR project team is working with the USACE on a commercial navigation needs analysis for the LHR and expects to leverage data on scouring, shoaling, and vessel-induced forces to inform stability evaluations. Overall, defining erosional and depositional zones is central to understanding migration potential, remedy permanence, and source control, and will be a key input to scoping, designing, and sequencing early actions.

#### **4a. Per- and polyfluoroalkyl substance (PFAS) Recommendation**

CSTAG agrees that the site's limited PFAS data are a gap in establishing PFAS source areas. Being proactive on PFAS sampling in likely source areas can provide the information needed to inform future decisions. PFAS analytical capabilities and interpretations are relatively new, so the Region should consider requesting support from EPA's Office of Applied Science and Environmental Solutions (OASES) staff to support PFAS sampling and results interpretation. CSTAG recommends that the Region be clear about the intended current uses of PFAS data following collection, which at this point may be limited to establishing the presence of ongoing, high-level sources to the LHR Site.

**Region 2 Response:** The Region agrees that clearly defining the intended use of any PFAS data and how it will inform decisions is essential. Region 2 will consider a consultation with OASES and other PFAS subject-matter experts to scope potential sampling needs, analytical methods, data interpretation, and decision-making considerations.

If warranted, PFAS sampling will be addressed primarily through the Site-wide baseline sampling program and coordinated with the OU2 TRI sampling. Based on current understanding, sediments are not expected to be a broadly significant PFAS source at the Site. As such, any potential PFAS sampling would focus on the media and locations most likely to inform source identification and potential risk (e.g., surface water, porewater, outfalls, and select sediments), using PFAS-appropriate sampling protocols and appropriate quality assurance/quality control methods.

#### **4b. Methylmercury Recommendation**

CSTAG recommends that the Region discuss how methylmercury will be accommodated in sampling and risk evaluations at the site. For example, it would be helpful to understand the Region's rationale for including or excluding methylmercury, using total mercury as a surrogate (if relevant), and whether and how likely impacted areas will be sampled for methylmercury. If risk management at the site is to

remain on an expedited timeframe, it will likely be important to foresee and manage this data need.

**Region 2 Response:** The Region agrees that mercury and mercury methylation are critical considerations for investigations, risk evaluations, and overall Site management, including development of a future final Site-wide remedy. The LHR project team recognizes the importance of mercury dynamics within the complex geochemical setting of the LHR, including conditions that influence the behavior of this redox-sensitive constituent as well as the behavior of others, such as arsenic and chromium.

The Region is working with the OU2 ASAOC Respondents to ensure the preliminary CSM appropriately identifies mercury methylation as a key process for OU2 and the entire Site. The inclusion of methylmercury in sampling and risk evaluations will be considered in the development of the forthcoming OU2 TRI Work Plan. The OU2 TRI Work Plan will define data use and DUOs/DQOs, investigation components, and detailed sampling designs and approaches, and it will set out the methodologies for the ERIE and the HHRIE. The LHR project team anticipates using the OU2 TRI Work Plan development process to align expectations regarding the scope, collection, and interpretation of methylmercury data to ensure decision-quality information for both interim remedy selection in OU2 and final remedy selection for the entire Site.

## **5. Preliminary Performance Metrics (PPM) Recommendation**

CSTAG recommends that when the interim remedy remediation goals are developed, the Region should be specific on how the interim remedy remediation goals fit into the risk management strategy, how they were derived, whether they will be applied on a point and/or area basis, and, if appropriate, how different contaminants of concern and receptor exposure areas are accommodated to satisfy the remedial action objectives of the interim remedy.

**Region 2 Response:** The Region agrees that well-defined PPMs are essential for evaluating any interim response action implemented in OU2 as well as interim response actions that may be implemented in other potential OUs. The PPMs for OU2 will be developed by the OU2 ASAOC Respondents, under EPA oversight, and will be aligned with early action-specific RAOs for OU2. In developing PPMs, the Region intends to work with the Respondents to clearly document their derivation, underlying assumptions, calculation methods, and assessment approach, including data sources, monitoring frequency, and decision criteria. While not yet developed, the Region anticipates that the PPMs will likely draw on a suite of metrics appropriate to the action and setting, such as SWACs, achievement or reduction relative to remedial action levels (RALs), and measures of NAPL containment/control, among others. The OU2 PPMs and the associated monitoring and evaluation procedures will be established in the OU2 TRI Work Plan and later remedial design documents.

## **6. Modeling Strategy Recommendation**

CSTAG recommends conducting a site modeling needs evaluation similar to that described in the SEDA guidance. If empirical approaches and the simpler hydrodynamic models aren't sufficient to address study objectives (or additional approaches become necessary to explain observations collected during ASM) then more complex modeling may be warranted.

**Region 2 Response:** The Region agrees that assessing the usefulness and necessity of modeling for the Site is important to support decision-making. Consistent with SEDA guidance (Section 6), the Region will apply a fit-for-purpose framework to evaluate when and how models should be used, recognizing that modeling applications may extend beyond sediment stability to include transport and fate, recovery projections to concentration thresholds, and evaluations of natural recovery within the broader ASM approach.

For the current OU2 TRI/FFS phase, Region 2 anticipates limited modeling needs. In accordance with the OU2 TRI/FFS ASAO SOW, food web modeling will be incorporated into the ERIE to evaluate risks to upper trophic level ecological receptors. Any model employed will be documented with clear objectives, conceptual models, inputs and data sources, calibration/validation approaches, and sensitivity/uncertainty analyses, and will be subject to appropriate quality assurance/quality control methods.

As work progresses on OU2, OU3, and across the Site (including in any additional identified OUs), the LHR project team will continually reassess modeling requirements, potentially starting with simpler screening or mass-balance tools and advancing to more complex hydrodynamic, sediment transport, and bioaccumulation models only where they are clearly justified by decision needs. Where appropriate, existing models developed for nearby or regional efforts (e.g., Ventron-Velsicol, Diamond Alkali, or other regional models) may be adapted to the Site.

## **7. Community Involvement Recommendation**

CSTAG supports the Region's deliberate and continued community involvement to foster a stronger site understanding and to better understand community perspectives. The likely duration of remedial actions, monitoring, and recovery highlights the importance of maintaining the relationship with the community as well as the site's biota consumption advisories that are intended to reduce human health risk. The Region and respondents are encouraged to continue or to expand their outreach as necessary on the public health risks of consuming fish from the LHR.

**Region 2 Response:** The Region will continue our community involvement efforts, including our in-house development of a Community Involvement Plan (CIP) with multiple stakeholder interviews, to inform our understanding of Site conditions and to reflect the diverse perspectives along the LHR corridor, from the wider, more channelized reaches with adjacent industrial properties in the south to the smaller, braided channels in the north where public access to the river varies. A Community Advisory Group (CAG) has been established, and the Region has met with the CAG multiple times to provide an overview of the Superfund process and the Site as well as project status updates. The Region will continue to engage regularly with the CAG, organize public availability sessions, as needed, and participate in stakeholder-organized public meetings, such as the annual Hackensack Nation Summit, to address community concerns and incorporate stakeholder input into project planning and decision-making.