

To: Susan Svirsky/R1/USEPA/US@EPA
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Date: 05/20/2008 12:03PM
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Subject: Updated: Rest of River CMS Comments from Mass Audubon

<<MassAudubon Comments on Housatonic CMS 5-20.08.pdf>>
<<SER_International_Restoration Guidelines.pdf>>

Hi Susan

Attached are Mass Audubon's comments on GE's Housatonic River "Rest of River" Corrective Measures Study as well as the white paper referenced as an Appendix. A hard copy will follow in the mail. Please feel free to contact me if you have any questions.

Please ignore the earlier email today on this subject (which contained comments on the Scoping document).

Many thanks,

-Kathy

Kathy Sferra

Director of Stewardship

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Protecting the Nature of Massachusetts



May 20, 2008

Susan Svirsky
Rest of River Project Manager
U.S. Environmental Protection Agency
10 Lyman Street
Pittsfield, MA 01201

Re: Comments on General Electric Corrective Measures Study for Housatonic “Rest of River”

Dear Ms. Svirsky:

On behalf of the Massachusetts Audubon Society I submit the following comments on the Corrective Measures Study (CMS) for the Housatonic River – Rest of River released by General Electric in March 2008. As the second largest landowner within the Primary Study Area (PSA) we appreciate the willingness of the Environmental Protection Agency (EPA) to accept informal public comments as well as to extend the period for public comment to sixty days to allow for a more detailed “informal” review of the CMS.

The following is a summary of the key points that are raised in our comment letter below, and which we request be addressed in a Supplemental CMS:

1. Mass Audubon has a direct and substantial interest in the proposed cleanup both as the second largest affected landowner within the PSA and as a conservation organization whose mission is protecting the nature of Massachusetts for people and for wildlife. Mass Audubon strongly supports the clean up of the Housatonic River in order to reduce PCB concentrations to acceptable levels for humans and wildlife.
2. The CMS contains insufficient information to evaluate the feasibility and cost of restoration of remediated areas. Given the sensitivity of the habitat along the Housatonic River and its floodplain, GE must be held to accordingly high standards for this clean up, which should begin with avoidance and minimization of adverse impacts to critical habitats. Where there is no alternative but to destroy habitats, restoration of affected areas to fully functional habitats must be required by EPA. Further information and analysis of restoration options through a Supplemental CMS is needed prior to identification of a recommended clean up alternative by EPA.
3. Proposed armoring of the riverbank in Reach 5 will have permanent, unacceptable impacts on critical habitat features such as wildlife dens and mature trees, and will fundamentally alter the riverine/floodplain system. More creative remediation and restoration alternatives should be identified and evaluated by GE in a Supplemental CMS.

4. EPA should ensure that appropriate financial and institutional mechanisms (e.g. escrow or other guaranteed funds) are in place to ensure that all restoration activities are fully implemented and monitored in perpetuity.
5. Adaptive management should be applied to the Housatonic River clean up, with flexibility to adjust remediation and restoration methods over time based on experience and evolving techniques. GE and EPA should give consideration to permitting a “demonstration phase” of the clean up south of the confluence which would employ state of the art restoration techniques and provide time for evaluation of the results before proceeding with the remainder of the clean up.
6. Further evaluation of compliance with state regulations is needed, particularly in relationship to the Massachusetts Endangered Species Act and Wetlands Protection Act.
7. Additional site-specific information is needed regarding floodplain remediation at Canoe Meadows Wildlife Sanctuary, remediation of vernal pools, construction of access roads and staging areas, use of the rail line for hauling materials and alternatives to the permanent landfilling of PCBs in proximity to the River.
8. GE should compensate affected landowners for the short and long-term harm to public recreational use of lands and waters that will be affected by the clean up as well as for any long term resource damage that will result. In addition, we expect GE to provide compensation for the significant direct costs incurred by Mass Audubon for staff and consultant review and oversight of this project.

I. Mass Audubon’s Land Interests within the Primary Study Area

Mass Audubon owns and operates the 262-acre Canoe Meadows Wildlife Sanctuary, located in the City of Pittsfield within reach 5A, approximately one mile downstream from the confluence of the East and West branches of the Housatonic River. Mass Audubon’s property is located primarily to the south of the Holmes Road Bridge, although a small portion of the sanctuary is located north of the bridge along the River. Canoe Meadows contains approximately 3,000 linear feet of frontage on the Housatonic River and includes approximately 2.6 acres of land under the Housatonic River.

Since its establishment in 1975, Canoe Meadows has been dedicated to wildlife habitat conservation and public education. Trails in the sanctuary are used extensively by the public for passive recreation and wildlife appreciation and for group programs, including the Sacred Way Trail which is located partially in the floodplain in proximity to the Housatonic River. Mass Audubon regularly conducts canoe programs for children and adults along the River. Because of concerns about PCB contamination in these areas, Mass Audubon has posted signs at the sanctuary that warn visitors about the presence of PCB contamination and provide advice about limiting exposure to PCB contamination.

The ecological characteristics of Canoe Meadows Wildlife Sanctuary are unusual in Massachusetts. The calcium-rich bedrock underlying the Housatonic Valley has given rise to especially fertile floodplain soils that support a uniquely high concentration of rare or uncommon species. The sanctuary alone provides habitat for at least seven state-listed rare species, including American Bittern (Endangered), a

breeding population of Wood Turtle (Special Concern), Bristly Buttercup (Threatened), and White Adder's-mouth (Endangered). Canoe Meadows also contains several certified vernal pools, and the uncommon northern leopard frog occurs there. Approximately 25% of the sanctuary's acreage, including the majority of the rare species habitat, is within the 10 year floodplain directly affected by PCB contamination. In addition to these rare species, there are also significant archeological resources located at Canoe Meadows.

The Upper Housatonic River Valley that includes Canoe Meadows Wildlife Sanctuary has also been designated by Mass Audubon as an Important Bird Area (IBA), underscoring its significance as bird habitat and as a migratory corridor. With approximately 1,300 acres of riparian woodland, oxbow ponds, marshes, beaver swamps, grasslands, and upland woods along the meandering Housatonic River, this IBA represents some of the finest riparian habitat remaining in central Berkshire County. The designated IBA comprises Canoe Meadows Wildlife Sanctuary in Pittsfield at the northern end; the 816-acre George L. Darey Housatonic Valley Wildlife Management Area, south of Canoe Meadows, extending from Pittsfield to Lenox and Lee; and the 200-acre Post Farm, the site of a former Lenox town landfill, currently managed by the Lenox Conservation Commission and abutting the Wildlife Management Area at its southern end. More than 200 species of birds have been recorded on these lands since 1970.

Up to several pairs of the state-endangered American Bittern breed in the area annually. A special concern species, the Common Moorhen is an uncommon though regular breeder in the area. Other high conservation priority species represented by at least 25 breeding pairs include: American Black Duck, American Woodcock, Hairy Woodpecker, Eastern Wood-Pewee, Alder Flycatcher, Least Flycatcher, Great Crested Flycatcher, Eastern Kingbird, Veery, Chestnut-sided Warbler, American Redstart, Indigo Bunting, and Rose-breasted Grosbeak. In addition, the following species with more than one percent of their entire breeding population within Massachusetts breed in the area: Eastern Phoebe, Wood Thrush, Gray Catbird, Blue-winged Warbler, Scarlet Tanager, and Baltimore Oriole. Riparian Forest is present along this portion of the Housatonic River. Characteristic breeding bird species of this increasingly rare habitat type include: Wood Duck, Hooded Merganser, Warbling and Yellow-throated Vireos, Veery, and Blue-gray Gnatcatcher. Rare and/or declining species representative of extensive freshwater marshlands that breed on the area include: American Bittern, Sora, Virginia Rail, King Rail, and Common Moorhen. The site is a migration corridor for the Common Nighthawk. **All of these species are currently affected by PCB contamination, and their future in this area will largely be dictated by the remediation and restoration efforts.**

Mass Audubon has a direct and substantial interest in the proposed cleanup both as the second largest affected landowner within the PSA and as a conservation organization whose mission is protecting the nature of Massachusetts for people and for wildlife. Mass Audubon strongly supports the clean up of the Housatonic River in order to reduce PCB concentrations to acceptable levels for humans and wildlife. At the same time, we recognize that this clean up is occurring within a highly complex ecosystem area with extraordinary scenic, wildlife habitat and recreational attributes including the gently meandering river itself, as well as the rare species habitat, floodplain forest, diverse wetlands, and vernal pools the river has influenced over time. The clean up, as envisioned in the CMS, will result in significant short and medium term adverse impacts on Mass Audubon's land as well as on land owned by the Massachusetts Department of Fish and Game,

including the potential construction of access roads and staging areas, closure of the most heavily visited recreational areas during the clean up, and alteration of critical habitat areas. As such, **it is essential that GE be held to accordingly high standards for this clean up, which must begin with avoidance and minimization of adverse impacts to critical habitats. Where there is no alternative but to destroy habitats, restoration of affected areas to fully functional habitats must be required by EPA.** The goal should not be creation of habitats that are merely aesthetically pleasing, but the restoration of high quality wildlife habitats that are functionally equivalent to those that will be altered by the remediation. We believe that restoration of the scope and nature that we envision is likely to significantly affect the cost of various alternatives and this cost must be factored into the evaluation of alternatives.

We believe that the affected landowners should also be compensated by GE for the short and long-term harm to public recreational use of lands and waters that will be affected by the clean up as well as for any long term resource damage that will result from the clean up of river and floodplain resources. For example, Mass Audubon derives program revenue from activities at Canoe Meadows that will be lost during the period work is ongoing at the Sanctuary. In addition, we anticipate that Mass Audubon's stewardship and science staff, and consultants will be required to devote significant time to ensuring that all restoration work is designed and carried out in an appropriate manner as part of any agreement to allow access to our property for this proposed remediation work. We expect that the cost of this staff time and related expenditures will be covered by General Electric as part of the design and monitoring process.

II. The CMS Contains Insufficient Information to Evaluate the Proposed Alternatives

II.A. Insufficient Information is Provided in the CMS on Post-Remediation Restoration

In Mass Audubon's comments on the CMS Scope, we acknowledged the importance of the Housatonic River clean up to improving the overall health of this river system, even though it will result in some relatively severe short-term alterations of critical habitats. In those comments, we noted in the importance of restoration of affected habitats in our comments, stating:

“... it is absolutely essential that the restoration of areas disturbed by remediation be very carefully planned, implemented, and monitored. This should include strong provisions to prevent establishment of invasive species in disturbed areas, and restoration of important habitat features such as bank habitat and vegetative structure and diversity to as close to “natural” conditions as possible.”

After review of the 800+ page CMS, we are surprised to see virtually no information about restoration of affected habitats, and note that such information is required by Condition #4 of EPA's Conditional Approval letter for the Corrective Measures Study Proposal dated April 13, 2007. For example, there has been widespread public criticism of the approach to bank restoration and stabilization in the upstream 1 ½ miles of the Housatonic River. We share the public concern about this work. While it may be achieving the result of creating an aesthetically acceptable vegetated river bank, we do not believe that functionally equivalent habitat has been created that adequately “replicates” the pre-construction functionality of the bank, and have not seen any studies suggesting that it has. We are similarly concerned about restoration of functional floodplain forest habitat, vernal pools, and river bottom habitat as we have not seen any studies to date that suggest that GE has fully restored functional

habitat in such resource areas along the River. If such information exists, it should be provided in the Supplemental CMS.

The CMS (p.4-28) states that the project “would include restoration of areas that are directly impacted... *as appropriate to restore the habitat value of the affected systems to the extent practical.* Restoration would be accomplished using a combination of passive procedures (practices to facilitate natural re-establishment of the resource) and active procedures (plantings or other mitigation)” [emphasis added]. GE’s CMS states that details of the restoration will be developed during the design phase of the project. Unfortunately this is after the selection of the most appropriate alternative and the opportunity for public comment. **The costs of this restoration work and the technical feasibility of restoration are essential components of the alternatives evaluation** and as noted above, we believe that they are significantly underestimated in the CMS, based on the work that we have seen occur upstream. Restoration of the type and scale necessary to allow this project to go forward in substantial compliance with federal and state Applicable or Relevant and Appropriate Requirements (ARARs), including the Massachusetts Wetlands Protection Act and the Massachusetts Endangered Species Act, is likely to significantly increase the costs of each of the alternatives, in an amount proportional to the scale of the habitat alteration proposed. **For these reasons, we do not believe that EPA can propose a remediation alternative without knowing whether or not it is possible to restore fully functional habitat in the areas that will be affected by the remediation.** GE’s own consultant acknowledged at the Citizens Coordinating Council public hearing in Lee that they know of no other location where work of this nature has been done in as sensitive a habitat area as the Housatonic. Since GE will, of necessity, be working on the “cutting edge” of sensitive habitat restoration, it is even more critical that attention to be paid to this issue as part of the alternatives evaluation in the CMS, not during the design phase of the project.

GE states on page 16 of the Executive Summary of the CMS “The greater the scale of the remediation, the greater the long-term adverse effects on the environment (e.g. loss of mature trees in the floodplain staging areas, changes in the nature of wetlands, and long-term adverse impacts on biota and habitat.” This statement is provided in support of SED 3, the clean up proposal that would result in the least impact to river systems. We do not concur with this reasoning. GE should not be using the sensitivity of the habitat along the river as a justification for a lower standard of remediation of the River. **EPA should insist on the appropriate level of cleanup and a correspondingly high standard for habitat restoration, even if this raises the cost of the selected alternative considerably.** To do otherwise would have the unintended consequence of “rewarding” polluters for damaging the most significant habitats as less clean up would be required in such sensitive locations.

One of our most significant concerns about post-remediation restoration relates to the proposed river bank remediation work in Reach 5A. As noted above, **the bank stabilization and “restoration” work that has been completed upstream is wholly inadequate to restore the functional values of the river bank. We concur with the comments made by the Massachusetts Division of Fisheries and Wildlife in the CMS scoping process that the upstream work, replicated here, would be “a disaster and a complete ecological failure.”** The Massachusetts Department of Environmental Protection (DEP) also weighed in expressing its concern about “hard engineering” of erodible banks:

“Mass DEP has a number of concerns relative to the widespread use of hard structures as bank stabilization structures in areas of the river below the confluence. The 2-mile stretch of river where these

structures have been used is a relatively straight section of channel (compared with the tight meanders in downstream sections) that is located in a highly urbanized area with minimal significant wildlife habitat and lower recreational and aesthetic value. By contrast, downstream river sections are undeveloped, provide significant habitat and experience significantly greater recreational use by the public. Widespread use of hard structures in this section of the river is likely to meet with considerable community opposition. Existing wildlife habitat functions will be lost and plantings to restore lost riverine characteristics can be problematic and not all that effective. In addition, the use of hard structures along the banks of the river will affect river flow dynamics by deflecting flows to downstream sections of the channel (particularly important in areas with meanders) and banks, and may also affect channel carrying capacity and the extent of flooding. In order to remain effective in preventing exposures and recontamination, long-term monitoring and potentially frequent maintenance of these structures (as evidenced by observations in the 0.5-Mile Reach) will be required. Considering the many river miles that may be impacted, such monitoring and maintenance may be a monumental task.”

Nevertheless, GE’s CMS proposes (p. 4-29) to stabilize the banks in the same manner as was done in the Upper ½ mile reach. The CMS (p. 4-44) discusses the long-term adverse impacts to this habitat that would result from the remediation/restoration as proposed. **We do not support any bank work within Canoe Meadows Wildlife Sanctuary that permanently “armors” the bank with stone, rip rap or other “hard” material in a manner that prevents future bank erosion and also prevents the planting of mature trees that will shade the river – which could eliminate habitat for avian and mammalian bank-dwelling species and adversely affect water temperature in the River. Such stabilization methods are also likely to result in downcutting of the river channel, exposing deep PCB-contaminated sediment layers. More creative bio-remediation or alternative approaches need to be identified by GE in the Supplemental CMS for this section of the river bank.** Examples of alternatives that should be evaluated include deeper excavation followed by covering armoring with clean material of sufficient depth to allow growth of mature trees; or leaving some sections of bank unaltered; or fully cleaning and restoring to a more natural condition some sections (i.e. through more localized testing and different treatments of some sections of the bank).

II.B. EPA Should Require a Supplemental CMS to address Ecological Restoration

As discussed above, we believe that GE has fundamentally failed to respond to comments that were raised in the CMS Scoping Process about the needs for detailed information on post-cleanup restoration by Mass Audubon, DEP, and the Massachusetts Division of Fisheries and Wildlife. Virtually no information is included regarding proposed restoration of the river bottom, banks and floodplains, access roads and staging areas. Without this information, we are unable to fully evaluate the various alternatives that are presented in the CMS and understand the impact that they will have on our property.

We have attached to our comment letter the Society for Ecological Restoration International’s *Primer on Ecological Restoration* (2004). We believe that EPA should direct GE to prepare a Supplemental CMS that fully and completely documents how habitats affected by remediation activities will be restored. The Supplemental CMS should include sufficient detail to evaluate whether proposed restoration activities meets established standards such as SER’s attributes of restored ecosystems, including re-established ecosystem structure and function, resilience, and self-sustenance. SER’s *Guidelines for Developing and Managing Ecological Restoration Projects* (2005; http://www.ser.org/content/guidelines_ecological_restoration.asp) provides additional detail. Only

when GE provides such information will the public and EPA be able to fully evaluate the acceptability and trade-offs involved in each of the alternatives.

We also believe that GE should be required by EPA to escrow sufficient funds to ensure that all restoration activities in Rest of River are fully carried out and monitored. GE should be reimbursed from the fund as the restoration is completed and demonstrated to be fully functional by post-construction monitoring. This is necessary to ensure that the long term funds are in place to ensure that restoration and monitoring occurs properly. In addition, EPA should establish a long-term funding mechanism to ensure that needed monitoring will take place in perpetuity. We do not believe that thirty years is a sufficient period for monitoring. Without such long-term monitoring, natural processes will eventually result in changes to the river system and the likely release of any PCBs that remain in the river system and floodplain. Historic maps of the area clearly depict the Housatonic as a dynamic river system, which has meandered across its floodplain for millennia. These meanders will continue as long as the river flows; armoring may alter these changes but will not stop them. Development in the watershed over the coming decades will increase storm flows and associated erosive forces. When these river dynamics are considered, it is more appropriate to be thinking in terms of hundreds of years than decades. GE must have a mechanism in place for accountability and appropriate responses to further PCB releases through this longer term.

III. The Selected Alternative Must be Responsive to Technological Advances and Site Conditions

The proposed clean up will occur over many years. There is an opportunity throughout the duration of this cleanup to apply new technologies and creative thinking. Mass Audubon believes that EPA should create a permitting process that is designed to recognize that technological advances in PCB clean up are likely to occur during this time period and encourage GE to employ them as the project progresses downstream. Therefore, we support the concept of a phased clean up.

We are open to discussing the possibility of using a portion of Reach 5A as a model or demonstration area for sound ecological restoration prior to the clean up proceeding along the remainder of the River. In this manner, GE would have the opportunity to demonstrate to the community and to regulatory agencies that the highest standard of restoration can be carried out following remediation activities. However, such an approach would require a period of study following the remediation and restoration work in order to provide time to gauge the effectiveness of the work and whether any modifications are needed in terms of the approach being taken.

The remediation planning and implementation process will be ongoing for a number of years. While alternative in-situ treatment technologies may not be presently available for utilization, the **remediation plans should be flexible enough to enable new technologies to be considered if and when they become available during further phases of planning or implementation.** This is part of an adaptive management approach, and appropriate for such a complex project of many years duration.

IV. The CMS contains Insufficient Information regarding to Compliance with ARARs

The CMS states that “it is anticipated that all the removal alternatives would meet the ARARs that have been identified” and that “... there is no material basis for distinguishing among these alternatives based

on ARAR compliance.” We respectfully disagree with this conclusion, particularly with regard to the application of the Massachusetts Endangered Species Act (MESA) and the Massachusetts Wetlands Protection Act (WPA) to the proposed project. **We urge EPA to require additional information from GE with regard to compliance with MESA and the WPA in the Supplemental CMS.** ARARs for this project should include measures to address the substantive requirements of these laws and associated regulations in regards to chemical, location, and activity-specific ARARs. While we recognize that the procedural requirements of these laws will not apply, there nevertheless are important substantive requirements that are not addressed in the draft CMS. A Supplemental CMS should address these concerns.

MESA is identified in Table 2-2 of the CMS as a “location-specific” ARAR, and the CMS dismisses the need for compliance by stating that there is no state-designated habitat in Massachusetts. In fact, the requirements of MESA will significantly affect the proposed project. The CMS states (p. 4-43) that long-term alteration of habitat could adversely affect rare and plant species. The project is located within Priority and Estimated Habitat of state listed rare species. Work within these areas is regulated under MESA and the associated regulations at 321 CMR 10.00 (http://www.mass.gov/dfwele/dfw/nhosp/regulatory_review/mesa/esa_home.htm). The CMS should specifically address the substantive requirements at 321 CMR 10.23(2):

If the Director [of Fish and Wildlife] determines that the applicant for a permit has avoided, minimized and mitigated impacts to State-listed Species consistent with the following performance standards, then the Director may issue a conservation and management permit, provided:

- (a) The applicant has adequately assessed alternatives to both temporary and permanent impacts to State-listed Species;*
- (b) An insignificant portion of the local population would be impacted by the Project or Activity, and;*
- (c) The applicant agrees to carry out a conservation and management plan that provides a long-term Net Benefit to the conservation of the State-listed Species that has been approved by the Director, as provided in 321 CMR 10.23(5), and shall be carried out by the applicant.*

The WPA is identified in Table 2-2 as a “location-specific” ARAR, stating “*under [310 CMR] 10.53(3)(q), actions responding to the release or threat of release of hazardous materials are allowed as “limited project” if they meet requirements specified therein. If response actions would not meet these criteria, the requirements of 10.54 -10.58 would apply.*” This is true, but also incomplete and inadequate. Even in instances where projects qualify for “limited project” status, thereby allowing impacts in excess of the usual WPA regulatory limits, projects are nevertheless required to demonstrate that alternatives to avoid and minimize impacts are considered, and that impacts are mitigated (310 CMR 10.53(3)). These are substantive requirements that should be evaluated in relation to all of the wetland resource areas impacted by proposed remedial actions and associated sediment transport and disposition measures. For example, alternatives to permanent loss of bank and mature woody vegetation structure should be evaluated, along with alternative restoration designs that minimize and mitigate for impacts to these and other wetland habitat features. Impacts to important wildlife characteristics of wetland

resource areas should be evaluated, using the substantive standards in the Department of Environmental Protection's *Massachusetts Wildlife Habitat Protection Guidance for Inland Wetlands*. (<http://www.mass.gov/dep/water/laws/wldhab.pdf>). Furthermore, the limited project provision of the WPA regulations prohibits impacts to rare species. Further alternatives analysis is needed to demonstrate maximum feasible compliance with this regulation before a waiver may be considered.

MESA and the WPA should be applied to the chemical and activity-specific ARARs as well as the location-specific section where they are currently mentioned. Chemical impacts to rare species and chemical alterations of wetland resources are covered by these laws. The choice of activities used in remediation has direct bearing on the degree to which impacts to rare species and wetlands are avoided, minimized, and mitigated.

V. Evaluation of Alternatives

As noted above, we feel strongly that without additional information on the type and nature of the proposed restoration it is not possible to adequately evaluate the alternatives that are presented by GE in the CMS. We do have the following preliminary comments regarding the alternatives:

- We believe that GE should be required to evaluate the feasibility of removing material from the project site using the existing railroad line.
- We have serious concerns about any proposals for thin layer capping of contaminated aquatic resources at Canoe Meadows including Oxbow Pond and West Pond. Both West and Oxbow Ponds are important habitats on the sanctuary, supporting populations of frogs, turtles, wading birds and waterfowl, and insects not found elsewhere on the site. Thin layer capping – which would deposit a thin layer of material directly over existing sediments, without removing contaminants, would make these ponds shallower and change their substrate characteristics, making them less suitable habitat for many organisms. It would also result in significant alteration of resources without any removal of contaminated soils. In the area of West Pond, the floodplain remediation options would impact portions of an old field, a *Phalaris* meadow, a wet meadow and a sedge marsh. The wet meadow in particular, hosts diverse plant, mammal, bird and insect communities and would be affected by FP2, 3, 4 and 7. We believe that these resources should either be fully remediated or left alone with monitored natural recovery – but are not able to choose between these alternatives without more specific information on proposed restoration.
- We request that there be additional site-specific analysis at Oxbow Pond in Reach 5A. This is a forested floodplain area that would be significantly altered by the proposed clean up. This area is likely to host rare species including wood turtles, mustard white, and purple milkweed, as well as Watch Listed species including butternut. Restoration of the forested areas affected by the remediation activities will take many decades, even in a best-case scenario. This floodplain forest is an area where a finer scale of analysis is needed with regard to PCB contamination levels to determine the most appropriate clean up remedy.

- We also believe that any work in the floodplain should be done at the same time as river/bank work so as to complete the work on any given affected property and move downstream in an orderly fashion.
- We are particularly concerned about the proposed vernal pool work which would alter 14 acres of vernal pool habitat, encompassing portions of 60 different vernal pools, and require the construction of extensive access roads and staging areas in some places. As noted on Pages 6-35, 36 and 39 of the CMS, there are no known locations where vernal pool work of this magnitude and extent has been successfully undertaken. We believe that additional examination of vernal pools should be required in the Supplemental CMS. In some cases it may be appropriate to choose monitored natural recovery for those pools that are distant from existing access points, and to ensure that breeding populations of vernal pool species are not entirely displaced as a result of remediation activities.
- In all cases, GE should be required to limit the extent of staging areas and access road construction to the extent feasible. For example, roads could be built narrower than 20 feet and staging areas should be as narrow as possible. One lane roads with pull-offs should be more than adequate. Full restoration of any areas disturbed for access and staging must be required with monitoring and revegetation to ensure that invasive species do not take hold in these areas.
- We are strongly opposed to construction of a Confined Disposal Facility within riverine wetland areas and concur with GE that this alternative is inappropriate. We are also concerned about the siting of a permanent landfill in close proximity to the Housatonic River. Additional evaluation of measures to treat and reuse soil should be contained in the Supplemental CMS, particularly in light of the claims made by BioGenesis that their treatment methods have applicability to this project.

Thank you for this opportunity to comment during this informal comment period on the Draft CMS. We want to again reiterate our strong support for the clean up of the Housatonic River for both its human health and ecological benefits. We look forward to continuing to work with EPA and GE, as well as with community leaders on these important issues over the coming months and years.

Sincerely,



Laura A. Johnson
President

cc: Jeff Porter, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. (for General Electric)

Kevin Mooney, Remediation Project Manager, General Electric
Mary Griffin, Commissioner, Massachusetts Department of Fish and Game
Laurie Burt, Commissioner, Department of Environmental Protection
Wayne F. MacCallum, Director, Massachusetts Division of Fisheries and Wildlife
Susan Steenstrup, DEP WERO
Congressman John Olver
Senator Benjamin B. Downing
Representative Christopher Speranzo
Representative Denis E. Guyer
Representative William Smitty Pignatelli
Berkshire Natural Resources Council
Housatonic Valley Association
Housatonic River Initiative
Berkshire Environmental Action Team
The Trustees of Reservations

Society for Ecological Restoration International **Guidelines for Developing and Managing Ecological Restoration Projects, 2nd Edition**

Guidelines for Developing and Managing Ecological Restoration Projects, 2nd Edition. Andre Clewell¹, John Rieger², and John Munro³. December 2005. www.ser.org and Tucson: Society for Ecological Restoration International.

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Preface to the Second Edition

The first edition of *Guidelines for Developing and Managing Ecological Restoration Projects (Guidelines)* was published on the website (www.ser.org) of the Society for Ecological Restoration International (SER International) on June 24, 2000. This new edition brings the *Guidelines* into conformity with the *SER International Primer on Ecological Restoration (SER International Primer)* (SER International 2002 and 2004) and expands the text for clarity and insight. Substitutions have been made for some terms, e.g., *implementation* for *installation*. The numbering of the guidelines was retained although some titles were modified. Peer review for the second edition was provided by the membership of the SER International Science and Policy Working Group and the SER International Board of Directors. This edition was approved as an official SER International document by the Board of Directors on December 15, 2005.

Introduction

This document describes the procedures for conducting ecological restoration in accord with the norms of the discipline that were established in the *SER International Primer* (SER 2002 and 2004, www.ser.org). Each procedure is stated in terms of a guideline that leads restoration practitioners and project managers stepwise through the process of ecological restoration. Adherence to these 51 guidelines will reduce errors of omission and commission that compromise project quality and effectiveness. The guidelines are applicable to the restoration* of any ecosystem—terrestrial or aquatic—that is attempted anywhere in the world and under any auspices, including public works projects, environmental stewardship programs, mitigation projects, private land initiatives, etc. Users of the *Guidelines* are advised to become familiar with the *SER International Primer* in advance and refer to it for definitions of terms and discussions of concepts. Design issues and the details for planning and implementing restoration projects lie beyond the scope of these guidelines. We leave such complexities to the authors of manuals and the presenters of workshops who address these topics

* “Restoration” when used alone in this document connotes “ecological restoration.”

Ecological restoration is the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. It is an intentional activity that initiates or accelerates ecosystem recovery with respect to its health (functional processes), integrity (species composition and community structure), and sustainability (resistance to disturbance and resilience). Restoration ensures abiotic support from the physical environment, suitable flows and exchanges of organisms and materials with the surrounding landscape, and the reestablishment of cultural interactions upon which the integrity of some ecosystems depends. Restoration attempts to return an ecosystem to its historic trajectory, i.e., to a state that resembles a known prior state or to another state that could be expected to develop naturally within the bounds of the historic trajectory. The restored ecosystem may not necessarily recover its former state, since contemporary constraints and conditions can cause it to develop along an altered trajectory.

In accord with the *SER International Primer*, these *Guidelines* assume that ecological restoration is accomplished once the assistance of a restoration practitioner is no longer needed to ensure long-term ecosystem sustainability. However, ecosystem management may be required to prevent recurrent degradation of restored ecosystems on account of alterations in the environment or anthropogenic changes. Such activities are considered management rather than restoration. In other words, ecological restoration makes ecosystems whole again and ecological management keeps them whole. Correspondingly, some restored ecosystems will require management in the form of traditional cultural practices. This distinction between restoration and management (including cultural practices) facilitates resource planning and budgeting, and it protects ecological restoration efforts from being held liable for subsequent inconsistencies or misjudgment in ecosystem management.

The project guidelines are numbered for convenience. They do not necessarily have to be initiated in numerical order, and some may be accomplished concurrently. The guidelines are grouped into six phases of project work: conceptual planning (including feasibility assessments), preliminary tasks (upon which subsequent planning relies), implementation planning, project implementation, post-implementation tasks (monitoring and aftercare), and evaluation and publicity.

We recommend that a diary be kept for each guideline to document project activities as they happen and to record all relevant information for each guideline as it is generated. Tabular data, graphics, and ancillary documents can be appended. Narratives in the form of written responses to Guidelines #1 through #36 collectively comprise a comprehensive ecological restoration plan that can be filed with public agencies, funding institutions, permitting authorities, corporate offices, and other interested parties. The narratives serve as the basis for preparing progress reports and applications for continuing financial support. They become invaluable to new practitioners and management personnel who are assigned in mid-project. When the project has been completed, the narratives comprise a thorough and well organized case history which only needs editing to generate a final report and to prepare articles for publication.

Conceptual Planning

Conceptual planning identifies the restoration project site, specifies restoration goals, and provides relevant background information. Conceptual planning is conducted when restoration appears to be a feasible option but before a decision has been made to exercise that option. Conceptual planning provides preliminary information such as observations from site reconnaissance and perhaps a few representative measurements. Detailed, systematic inventories of ecosystem properties and the biota are not included in this phase of activity. Written responses to Guidelines #1 through #16 collectively comprise the conceptual plan and broadly characterize the proposed restoration project.

- 1. Identify the project site location and its boundaries.** Delineate project boundaries and portray them as maps, preferably generated on a small-scale aerial photograph and also on soil and topographic maps that show the watershed and other aspects of the surrounding landscape. Use of GPS (Global Positioning System), land survey, or other measurement devices as appropriate is encouraged.
- 2. Identify ownership.** Give the name and address of the landowner(s). If an organization or institution owns or manages all or part of the site, give the names and titles of key personnel. Note the auspices under which the project will be conducted—public works, environmental stewardship, mitigation, etc. If there is more than one owner, make sure that all are in agreement with the goals and methods proposed for the restoration program.
- 3. Identify the need for ecological restoration.** Tell what happened at the site that precipitated the need for restoration. Describe the improvements that are anticipated following restoration. Benefits may be ecological, economic, cultural, aesthetic, educational, and scientific. Ecological benefits may amplify biodiversity; improve food chain support, etc. Economic benefits are natural services (also called social services) and products that ecosystems contribute towards human wellbeing and economic sustainability. Ecosystems in this regard are recognized and valued as natural capital.

Cultural improvements may include social performance and rituals, passive recreation, and spiritual renewal. Aesthetic benefits pertain to the intrinsic natural beauty of native ecosystems. Educational benefits accrue from advances in environmental literacy that students gain from participating in, or learning about, ecological restoration. Scientific benefits accrue when a restoration project site is used for demonstration of ecological principles and concepts or as an experimental area.

- 4. Identify the kind of ecosystem to be restored.** Name and briefly describe the kind of ecosystem that was degraded, damaged, or destroyed, for example, tropical dry forest, vernal pool, semiarid steppe, shola (India), chalk meadow (Europe), cypress swamp (USA), etc. Other descriptors should be added to facilitate communication with those who may not be familiar with the natural landscapes in the bioregion. These descriptors should include the names of a few characteristic or conspicuous species and should indicate community structure (desert, grassland, savannah, woodland, forest, etc.), life form (herbaceous perennial, succulent, shrub, evergreen tree, etc.), predominant taxonomic categories (coniferous, graminaceous, etc.), moisture conditions (hydric, xeric,

etc.), salinity conditions (freshwater, brackish, saline, etc.), and geomorphologic context (montane, alluvial, estuarine, etc.). Reference to readily accessible published descriptions can augment or replace some of these descriptors.

5. Identify restoration goals. Goals are the ideal states and conditions that an ecological restoration effort attempts to achieve. Written expressions of goals provide the basis for all restoration activities, and later they become the basis for project evaluation. We cannot overemphasize the importance of expressing each and every project goal with a succinct and carefully crafted statement. All ecological restoration projects share a common suite of ecological goals that consist of recovering ecosystem integrity, health, and the potential for long-term sustainability. They are listed as the attributes of restored ecosystems in Section 3 of the *SER International Primer*. They deserve to be restated for each restoration project. Otherwise, they can be underappreciated or overlooked by authorities and other interested parties who are not well versed in ecological restoration. A project may have additional ecological goals, such as to provide habitat for particular species or to reassemble particular biotic communities.

Statements of ecological goals should candidly express the degree to which recovery can be anticipated to a former state or trajectory. Some ecosystems can be faithfully restored to a known or probable historic condition, particularly when degradation or damage is not severe and where human demographic pressures are light, plant species richness are low on account of rigorous environmental conditions, and where the ecologically young vegetation in a newly restored ecosystem tends to resemble the mature vegetation of the pre-disturbance state. Even so, the restored ecosystem will undoubtedly differ in some respects from its model, owing to the complex and seemingly random (stochastic) aspects of ecosystem dynamics. Other restorations may not even approximate a historical model or reference, because contemporary constraints or conditions prevent restoration to a former, historic condition.

Restoration can be conducted in any of five contexts. The appropriate context should be identified in the project goals in order to underscore the intent of restoration and to avoid or minimize subsequent misunderstandings, conflict and criticisms. They are:

- a) **Recovery of a degraded** (subtle or gradual changes that reduce ecological integrity and health) **or damaged** (acute and obvious changes) **ecosystem to its former state.**
- b) **Replacement of an ecosystem that was entirely destroyed** (degradation or damage removes all macroscopic life), and commonly ruins the physical environment) **with one of the same kind.** The new ecosystem must be entirely reconstructed on a site that was denuded of its vegetation (terrestrial systems) or its benthos (aquatic systems). Replacements are common on surface-mined lands and brownfields (severely damaged urban and industrial lands).
- c) **Transformation** (conversion of an ecosystem to a different kind of ecosystem or land use type) **of another kind of ecosystem from the bioregion to replace one which was removed from a landscape that became irreversibly altered.** This option is important for restoring natural areas in an urban context where, for example, original hydrologic conditions cannot be restored.

- d) **Substitution of a replacement ecosystem where an altered environment can no longer support any naturally occurring type of ecosystem in the bioregion.** The replacement ecosystem may consist of novel combinations of indigenous species that are assembled to suit new site conditions as, for example, at a retired solid waste disposal site.
- e) **Substitution of a potential replacement ecosystem, because no reference system exists to serve as a model for restoration.** This option is relevant in densely populated regions of Eurasia, where many centuries of land use have obliterated all remnants of original ecosystems.

All ecological restoration projects have cultural goals (see Guideline #3), even though such goals may be implied in the enabling legislation that authorizes public agencies to conduct or permit project work. All cultural goals should be stated clearly, because they provide the basis for public understanding of the benefits of a project. Public appreciation is conducive to garnering fiscal support, to accommodation of project activities by public agencies, to attracting stakeholder participation in project planning and implementation, and to commanding respect for the restored ecosystem by local residents.

6. Identify physical site conditions in need of repair. Many ecosystems in need of restoration are dysfunctional on account of damage to the physical environment, such as soil compaction, soil erosion, surface water diversion, and impediments to tidal inundation. The physical environment must be capable of sustaining viable, reproductive species populations that comprise the biota of the restored ecosystem.

7. Identify stressors in need of regulation or re-initiation. Stressors are recurring factors in the environment that maintain the integrity of an ecosystem by discouraging the establishment of what would otherwise be competitive species. Examples are fires, anoxia caused by flooding or prolonged hydroperiod, periodic drought, salinity shocks associated with tides and coastal aerosols, freezing temperatures, and unstable substrates caused by water, wind or gravity as on beaches, dunes, and flood plains. In some ecosystems, stressors may include sustainable cultural activities, such as the periodic harvest of biotic resources and the ignition of fires. These should be identified as stressors of cultural origin.

8. Identify and list the kinds of biotic interventions that are needed. Many restoration projects require manipulation of the biota, particularly vegetation, to reduce or eradicate unwanted species and to introduce or augment populations of desirable species. Invasive non-native species generally require extirpation. Other species, native or non-native, may be removed if they retard or arrest biotic succession. Species that may need introduction include mycorrhizal fungi, N-fixing bacteria, other soil microbiota and, in aquatic environments, benthic infauna (animals that live in sediments). Mobile animals generally colonize restored habitats spontaneously; however, animal introductions are sometimes needed. Animals can be enticed to colonize project sites by providing perches for birds, distributing coarse detritus for small animal cover, preparing a variety of different substrates in streams as habitat for macroinvertebrates, etc.

9. Identify landscape restrictions. Population demographics of many species at a project site may be adversely affected by external conditions and activities offsite in the

surrounding landscape. Land and water usage are commonly at fault. Restoration should not be attempted if the landscape is likely to be heavily compromised.

Restoration of some aquatic ecosystems depends entirely on making ecological improvements elsewhere in the catchment, and all restoration work is accomplished offsite. An example of an impact from offsite would be discharge of turbid or polluted water such as agricultural runoff that reaches a proposed project site. Another example would be recurrent flooding and consequent sedimentation in a lowland site that was caused by unrestrained runoff following harvest of montane forest. In this instance, restoration efforts might be better directed at afforestation (forest recovery) in highlands. The hydrologic regime in any project site can be altered offsite by dams, drainage projects, diversions of runoff caused by highways and other public works, and by impervious surfaces on developed land. Water tables can be depressed gradually by transpiration following reforestation and can be raised acutely after timber harvest or after ditches are filled. Fire frequency is reduced by intentional suppression and by landscape fragmentation that interrupts the cover of flammable vegetation. Fire hazards develop in the form of dense brush in response to fire suppression. Exotic species colonization onsite is commonly traced to infestations offsite. The presence or abundance of birds and other mobile animals in the restored ecosystem depends on the health of other ecosystems in the landscape that comprise parts of their territories.

Hazards elsewhere in the landscape such as these should be identified and evaluated in terms of their potential to compromise restoration efforts, and the possibility that they can be ameliorated should be assessed realistically.

- 10. Identify project-funding sources.** Potential external funding sources should be listed if internal funding is inadequate.
- 11. Identify labor sources and equipment needs.** Personnel may have to be hired, volunteers invited, and other labor contracted. Determine the need and availability of special equipment.
- 12. Identify biotic resource needs and sources.** Biotic resources may include seeds, other plant propagules, nursery-grown planting stocks, and animals for establishment at the project site. Some stocks are commercially available. Others, such as seeds of native plants, may have to be collected from other natural areas.
- 13. Identify the need for securing permits required by government agencies.** Permits may be required for tasks such as the excavation or filling of streams and wetlands, other earthwork activities, herbicide use, and prescribed burning. Other permits may be applicable for the protection of endangered species, historic sites, etc.
- 14. Identify permit specifications, deed restrictions, and other legal constraints.** Zoning regulations and restrictive covenants may preclude certain restoration activities. Legal restrictions on ingress and egress could prevent the implementation of some restoration tasks. If the restoration is to be placed under conservation easement, the timing of the easement must be satisfied and manipulations to the environment may have to be completed prior to the effective date of the easement. If restoration is to be

conducted under contract or as mitigation or mitigation banking, contract conditions and permit specifications must be compatible with the restoration plan and incorporated into it. If they are not, negotiations may have to be conducted with the agency in charge.

15. Identify project duration. Project duration can greatly affect project costs. Short-term restoration projects can be more costly than longer-term projects. The longer the project, the more the practitioner can rely on natural recovery and volunteer labor to accomplish specific restoration objectives that are identified below in Guideline #27. In accelerated restoration programs such as mitigation projects, costly interventions must substitute for these natural processes.

16. Identify strategies for long-term protection and management. Ecological restoration is meaningless without reasonable assurance that the project site will be protected and properly managed into the indefinite future. To the extent possible, threats to the integrity of a restored ecosystem on privately owned land should be minimized by mechanisms such as conservation easements or other kinds of zoning. External threats can be reduced by buffers and binding commitments from neighboring landowners. Alternatively, the restored ecosystem could be legally transferred to a public resource agency or non-governmental organization. However, the protection and management of restored ecosystems on public lands are not guaranteed, and a formal commitment for that purpose by the responsible agency is desirable.

Preliminary Tasks

Preliminary tasks are those upon which project planning depends. These tasks form the foundation for well-conceived restoration designs. Preliminary tasks are fulfilled after the completion of conceptual planning and the decision to proceed with the restoration project.

17. Appoint a restoration practitioner who is in charge of all technical aspects of restoration. Restoration projects are complex, require the coordination of diverse activities, and demand numerous decisions owing in part to the complex nature of ecosystem development. For these reasons, leadership should be vested in a restoration practitioner who maintains overview of the entire project and who has the authority to act quickly and decisively to obviate threats to project integrity. Many smaller projects can be accomplished by a single practitioner who functions in various roles—from project director and manager to field technician and laborer. Larger projects may require the appointment of a *chief restoration practitioner* who oversees a restoration team that includes other restoration practitioners. The chief practitioner may delegate specific tasks but retains the ultimate responsibility for the attainment of objectives.

Ideally, the expertise of the chief practitioner should be solicited by project planners. If restoration is a subcontract component of a larger project, the chief practitioner should enjoy equal status with other subcontractors to prevent actions that could complicate scheduling, compromise restoration quality, and inflate costs. In any event, the chief practitioner and the project manager should maintain open lines of communication.

Practitioner responsibilities are sometimes divided according to the organizational charts of larger corporations and government bureaus. Pluralistic leadership augments the potential for errors in project design and implementation. In mitigation projects, agency personnel become silent co-partners with the chief practitioner when they mandate particular restoration activities as permit specifications. This practice reduces the chief practitioner's capacity for flexibility and innovation, including the prompt implementation of mid-course corrections. The preparation of a written guidance document, based upon responses to these guidelines, will help promote the judicious execution of the restoration project in cases of pluralistic leadership.

18. Appoint the restoration team. For larger projects, the chief practitioner may need the collaboration of other practitioners to supervise labor crews and subcontractors and also of technical personnel with critical skills and expertise. Collectively, they comprise the restoration team. It is essential that the responsibilities of each individual are clearly assigned and that each person be given concomitant authority.

19. Prepare a budget to accommodate the completion of preliminary tasks. The budget addresses labor and materials and includes funds needed for reporting. It recommends or specifies a schedule of events.

20. Document existing project site conditions and describe the biota. This guideline builds on preliminary information in the responses to guidelines #3 and #4 and is significantly more comprehensive and detailed. Documentation for this guideline should include a systematic inventory that quantifies the degree of degradation or damage. Species composition should be determined and species abundance estimated. The structure of all component communities should be described in sufficient detail to allow a realistic prediction of the effectiveness of subsequent restoration efforts. Soils, hydrology, and other aspects of the physical environment should be described. Such information is critical later in project evaluation, which depends in part upon being able to contrast the project site before and after restoration.

Properly labeled and archived photographs are essential for documenting any restoration project. Numerous photos should be taken with care during good photographic conditions prior to conducting any restoration work. Photographic locations and compass directions should be recorded, so that before and after photos can be compared. Close-up and wide angle photos should be included, with some taken from an elevated position as from the cargo bed of a truck. Videotapes, aerial photographs, and oblique aerial photos from a low-flying aircraft are helpful.

21. Document the project site history that led to the need for restoration. Site history that was identified for Guideline #3 is expanded, if necessary, to provide a comprehensive overview. The years during which impacts occurred should be recorded. Historical aerial photos that show the pre-disturbance state and that show disturbance events are helpful.

22. Conduct pre-project monitoring as needed. Often it is useful or requisite to obtain baseline measurements on such parameters as water quality, groundwater elevation, and gross metabolism of soil organisms for a year or more prior to initial

project installation. If so, these measurements will continue throughout the life of the project as part of the monitoring program. Unanticipated extremes in data can indicate problems that might require mid-course correction to prevent the collapse of the project. Upon project completion, the data are assessed to help evaluate the effectiveness of restoration.

23. Establish the reference ecosystem or “reference.” The reference model represents the future condition or target on which the restoration is designed and which will serve later as a basis for project evaluation. The reference can consist of the pre-disturbance condition if it is known, one or more undisturbed sites with the same type of ecosystem, descriptions of such sites, or another document, as described in Section 5 of the *SER International Primer*. The reference must be sufficiently broad to accommodate the amplitude of potential endpoints that could reasonably be expected from restoration.

The selection of the reference increases in difficulty in instances where contemporary constraints and conditions alter the historic trajectory or in other instances where the bioregion lacks comparative ecosystems of the kind being restored. In extreme cases, the only concrete reference data may consist of a list of native species that could potentially contribute to the assembly of an ecosystem with the intended community structure. The degree to which the reference can serve as a model for a restoration project and for its evaluation depends on its specificity and its appropriateness, and both can vary widely among projects. In some projects, the reference can serve almost as a template. In others, it can only hint at the direction of development.

24. Gather pertinent autecological information for key species. The chief practitioner should access whatever knowledge is available regarding the recruitment, maintenance, and reproduction of key species. If necessary, trials and tests of species establishment and growth can be conducted by the restoration team prior to project implementation.

25. Conduct investigations as needed to assess the effectiveness of restoration methods and strategies. Innovative restoration methods may require testing prior to their implementation at the project site. Experimental plots or small-scale “pilot projects” may demonstrate feasibility or reveal weaknesses in restoration design and execution prior to attempting larger-scale restoration. Pilot projects are particularly useful in attempting the restoration of a particular kind of ecosystem for the first time in a bioregion.

26. Decide whether ecosystem goals are realistic or whether they need modification. The selection of realistic goals is crucial. The potential for the achievement of some goals that were identified during conceptual planning (Guideline #5) may now appear unrealistic in light of more thorough information generated subsequently. Other goals could be added. At this time, the project team should reassess the selection of goals in Guideline #5 and make modifications if warranted.

27. Prepare a list of objectives designed to achieve restoration goals. In order to achieve restoration goals, explicit actions are undertaken to attain specific end results. Each end result is called an objective. For example, if the goal is to recover the former forest ecosystem on land that was converted for the production of row-crops, one

objective might be to establish tree cover with a designated species composition and species abundance at a finite location in that field. In restoration projects that are conducted under contract, objectives are ordinarily “time certain,” meaning that they are to be done within a specified length of time in order to accommodate project planning, budgeting, and regulatory concern.

Objectives are subject to precise empirical determination, as will be described in Guideline #36. Objectives are selected with the anticipation that their completion will allow the fulfillment of project goals. Goals are less amenable to precise empirical determination, because they require measurements of innumerable parameters that are constantly subject to change on account of ecosystem dynamics. For that reason, objectives are used as indicators of the achievement of goals.

Ecological objectives are realized by manipulating the biota and/or the physical environment. Some are executed at the beginning of restoration, such as removing a road, filling a previously excavated canal, or adding organic matter or lime to the soil. Other objectives require repetitious actions, such as the periodic ignition of prescribed fires or the removal of recurring invasive species that threaten the establishment of desirable vegetation. Some objectives may require actions that take place offsite to improve conditions onsite. The number of ecological objectives for an ecological restoration project may vary from one to many, depending upon project goals and the degree to which the ecosystem was degraded or damaged.

Cultural objectives pertain to the realization of cultural project goals. These objectives may involve publicity campaigns, public celebrations of restoration in progress, participation of stakeholders and school children in restoration implementation and monitoring, and other actions that ensure cultural intimacy with ecosystem recovery.

28. Secure permits required by regulatory and zoning authorities. These permits were identified in guidelines #13 and #14.

29. Establish liaison with interested public agencies. Ecological restoration is necessarily an endeavor of public concern, even if it is conducted on privately owned land without public expenditure. A restored ecosystem provides beneficial natural services well beyond property boundaries. Since restoration generally contributes to public wellbeing, public agencies that are responsible for natural resource protection and management should be aware of any restoration projects within their jurisdictions, regardless of ownership and funding. Upon their recognition, restoration projects can be afforded protection, favorable publicity, attentive management, or other favorable accommodation by public agencies. Site tours, websites, newsletters, and press releases are ways of establishing liaison with public agencies. Interagency memoranda can inform other agencies of restoration projects initiated by a sponsoring agency on public land.

30. Establish liaison with the public and publicize the project. Local residents automatically become stakeholders in the restoration. They need to know how the restored ecosystem can benefit them personally. For example, the restoration may attract ecotourism that will benefit local businesses, or it may serve as an environmental education venue for local schools. If residents favor the restoration, they will protect it

and vest it with their political support. If they are unaware of the restoration and its public benefits, they may vandalize or otherwise disrespect it.

31. Arrange for public participation in project planning and implementation to fulfill cultural goals. Many ecological restoration projects are conducted in technocratic manner; particularly those that are intended to satisfy contract conditions and permit stipulations required by public agencies. The public is commonly excluded except at legally required and sometimes perfunctory public hearings. Restoration is planned, implemented, and monitored by trained professionals without the assistance of volunteers from the public who may be perceived as liability risks for insurance purposes and who could complicate scheduling and supervision. Public participation could increase project costs and threaten timely project completion. However, the exclusion of the public can cause other problems such as those mentioned in Guideline #30. Public agencies should consider incentives for the restoration team to incorporate local residents and other stakeholders in all phases of project work. By doing so, the public will develop a feeling of ownership, and participants may assume a stewardship role for the completed project.

32. Install roads and other infrastructure needed to facilitate project implementation. Ordinarily, restoration projects remove roads and other infrastructure. However, improvements or new construction may be necessary to provide access to project sites or otherwise facilitate project implementation and maintenance. For instance, infrastructure improvement could reduce down time, improve safety, create opportunities for public relations tours, reduce trafficking through sensitive habitats, and discourage erosion from surface runoff on exposed land. Haul roads, staging areas, and fire lanes should be constructed as needed. To the extent possible, infrastructure should be removed in a subsequent task during project implementation.

33. Engage and train personnel who will supervise and conduct project implementation tasks. Project personnel who lack restoration experience or knowledge of particular methods will benefit from attending workshops and conferences that provide background information. Otherwise, the chief practitioner should provide or arrange for training. Ideally, everyone who engages in the restoration, including laborers, should be briefed on project goals and objectives.

Implementation Planning

Implementation plans describe the tasks that will be performed to realize project objectives. These tasks collectively comprise the project design. The care and thoroughness with which implementation planning is conducted will be reflected by how aptly implementation tasks are executed.

34. Describe the interventions that will be implemented to attain each objective. The chief practitioner designates and describes all actions, treatments, and manipulations needed to accomplish each objective listed in Guideline #27. For example, if the objective is to establish tree cover with a designated species composition and species abundance on former cropland, one intervention could be to plant sapling trees of the designated species at specified densities.

Restoration projects should be designed to reduce the need for mid-course corrections that inflate costs and cause delays. In that regard, special care should be given to the design of site preparation activities that precede the introduction of biotic resources. Once biotic resources are introduced, it may become exceedingly difficult and expensive to repair dysfunctional aspects of the physical environment on account of inadequate site preparation.

Some restoration interventions require aftercare or continuing periodic maintenance after initial implementation. These tasks are predictable and can be written into the implementation plans under their respective objectives. Examples of maintenance tasks include the repair of erosion on freshly graded land and the removal of competitive weeds and vines from around young plantings.

35. Acknowledge the role of passive restoration. Commonly, some but not all aspects of an ecosystem require intentional intervention to accomplish restoration. For example, if a correction to the physical environment is all that would be needed to initiate the recovery of the biota, then the practitioner would limit restoration activities to making that correction. To ensure that all aspects of ecosystem recovery have been considered, the restoration plan should acknowledge those attributes that are expected to develop passively without intervention. In the example, the practitioner would state that no manipulations were needed for the recovery of the biota.

Realize that ecological restoration is an intentional process that involves at least modest intervention on the part of a practitioner. If recovery occurs without any intervention, it should be called *natural reestablishment* or designated by another term besides *ecological restoration*.

36. Prepare performance standards and monitoring protocols to measure the attainment of each objective. A performance standard (also called a *design criterion* or *success criterion*) is a specific state of ecosystem recovery that indicates or demonstrates that an objective has been attained. For example, if the objective is to reestablish tree cover with a particular species composition and abundance on former cropland (as stated in the example for Guideline #27) and an intervention to realize that objective is to plant tree saplings of particular species at specified densities (as stated in the example for Guideline #34), then a plausible performance standard would be the establishment of a young forest that contained certain species of trees with minimal thresholds for tree species density, tree height, and collective canopy closure within a specified timeframe. Another potential example of performance standards would be the attainment of a threshold percentage of herbaceous vegetative cover in a seeded area within a given timeframe.

Satisfaction of some performance standards can be attained by a single observation—for example, to determine whether a canal has been filled. Other performance standards require a series of monitoring events to document trends towards the attainment of a specified numeric threshold for a physical parameter or for a particular level of plant abundance or growth.

Performance standards require careful selection so as to engender confidence in their power to measure the attainment of an objective. Otherwise, the objectivity of the performance standard may be biased by the initial results of implementation.

Monitoring protocols should be geared specifically to performance standards. Other monitoring generates extraneous information and inflates project costs. Monitoring protocols should be selected that allow data to be gathered with relative ease, thereby reducing monitoring costs. When a monitoring protocol is selected, a procedure for the analysis of monitoring data should be specified. For example, a statistical procedure could be designated—and a confidence interval stipulated—for determining significant differences.

Performance standards are of particular utility in restoration projects that are conducted by contractors or that are required to satisfy permit conditions. The attainment of performance standards represents hard evidence that objectives have been met, that contractors can be paid, and that permit holders can be released from regulatory liability. Conversely, non-attainment demonstrates non-compliance that can lead to enforcement actions and legal sanctions.

In a less technocratic context, the need for inclusion of performance standards in a restoration project diminishes. In smaller, less complex projects, or in projects where time of completion is not an issue, performance standards need not be specified. Instead, an ecological evaluation can be substituted in accord with Guideline #49.

37. Schedule the tasks needed to fulfill each objective. Scheduling can be complex. Some interventions can be accomplished concurrently and others must be done sequentially. Planted nursery stock may have to be contract-grown for months or longer in advance of planting and must be delivered in prime condition. If planting is delayed, planting stocks may become root-bound and worthless. If direct seeding is prescribed, seed collecting sites will have to be identified. The seed must be collected when ripe and possibly stored and pre-treated. Site preparation for terrestrial systems should not be scheduled when conditions are unsuitable. For example, soil manipulations cannot be accomplished if flooding is likely, and prescribed burning must be planned and conducted in accordance with applicable fire codes. The temporary unavailability of labor and equipment can further complicate scheduling. Workdays may have to be shortened for safety during especially hot weather and in lightning storms. Wet weather may cause equipment to become mired. Schedules should reflect these eventualities.

Tasks for most objectives are implemented within a year or two. Some tasks may have to be delayed. For example, the re-introduction of plants and animals that require specialized habitat requirements may have to be postponed several years until habitat conditions become suitable.

38. Obtain equipment, supplies, and biotic resources. Only appropriate items should be procured. For example, machinery should be selected that does not compact the soil inordinately or damage it when making turns. Degradable materials such as organic mulch are generally preferable to persistent ones such as plastic ground covers. Nursery-grown plants should be accepted only in peak condition, and their potting soil should

consist of all natural materials. Care should be taken to ensure that regional ecotypes of biotic resources are obtained to increase the chances for genetic fitness and to prevent introduction of poorly adapted ecotypes. However, a wider selection of ecotypes and species may be advantageous in order to pre-adapt the biota at project sites undergoing environmental change. Nurseries sometimes supply superior trees that have been selected for timber quality. These may have to be inter-planted with “inferior” stock to facilitate ecosystem processes other than fiber production. For instance, deformed trees may be valuable for their wildlife cavities. Named cultivars and hybrids are unacceptable other than as temporary cover or nurse crops, because they do not represent natural species or taxa.

39. Prepare a budget for implementation tasks, maintenance events, and contingencies. Budgeting for planned implementation tasks is obvious. However, budgeting for unknown contingencies is equally important. No restoration project has ever been accomplished exactly as it was planned. Restoration is a multivariate undertaking, and it is impossible to account for all eventualities. Examples of contingencies are severe weather events, depredations of deer and other herbivores on a freshly planted site, colonization by invasive species, vandalism, and unanticipated land use activities elsewhere in the landscape that impact the project site. The need to make at least some repairs is a near certainty. Generally, the cost of repair increases in relation to the time it takes to respond after its need is discovered. For these reasons, contingency funds should be budgeted for availability on short notice.

Implementation Tasks

Project implementation fulfills implementation plans. If planning was thorough and supervision is adequate, implementation can proceed smoothly and within budget.

40. Mark boundaries and work areas. The project site should be staked or marked conspicuously in the field, so that labor crews know exactly where to work.

41. Install permanent monitoring fixtures. The ends of transect lines, photographic stations, bench marks, and other locations that will be used periodically for monitoring are staked or otherwise marked on-site and, if possible, identified with GPS coordinates. Staff gauges, piezometer wells, or other specified monitoring equipment is installed, marked, and their locations identified with GPS coordinates.

42. Implement restoration tasks. Restoration tasks were identified in Guideline #34, and these are now implemented to fulfill the ecological restoration objectives. The chief practitioner supervises project implementation or delegates supervision to project team members. Responsibility for proper implementation generally should not be entrusted to subcontractors, volunteers, and labor crews who are doing the work. The cost of retrofitting exceeds the cost of appropriate supervision.

Post-implementation Tasks

The attainment of objectives may depend as much on aftercare as it does to the care given to the execution of implementation tasks. The importance of post-implementation work cannot be overemphasized.

43. Protect the project site against vandals and herbivory. Security of the project site should be reviewed following project implementation. Vandalism may include youths who use project sites for recreational activities (e.g., camp fires, dirt bike riding). Grazing animals include domestic livestock, feral swine, deer, elephants, geese, nutria and many others. Beaver can destroy a newly planted site by plugging streams and culverts. Nuisance animals may require trapping and relocation or the construction of fenced enclosures.

44. Perform post-implementation maintenance. Conduct any maintenance activities that were described in Guideline #34.

45. Reconnoiter the project site regularly to identify needs for mid-course corrections. The chief practitioner needs to inspect the project site frequently, particularly during the first year or two following an intervention, to schedule maintenance and to react promptly to contingencies.

46. Perform monitoring as required to document the attainment of performance standards. Monitoring and the reporting of monitoring data are expensive. For that reason, monitoring should not be required until the data will be meaningful for decision-making. Regular reconnaissance (Guideline #45) may negate the need for frequent monitoring. Not all monitoring can be postponed. Some factors, such as water elevations and water quality parameters, are usually measured on a regular schedule to provide interpretable data. Sometimes monitoring is required to document survival of planting stock. A more effective substitute would be to require the replacement of stock that did not survive in lieu of monitoring.

47. Implement adaptive management procedures as needed. Adaptive management as a restoration strategy is highly recommended, if not essential, because what happens in one phase of project work can alter what was planned for the next phase. A restoration plan must contain built-in flexibility to facilitate alternative actions for addressing underperformance relative to objectives. The rationale for initiating adaptive management should be well documented by monitoring data or other observations. The project manager should realize that restoration objectives may never be realized for reasons that lie beyond the control of the chief practitioner. If so, then new goals (Guideline #5) and objectives (Guideline #27) may have to be substituted to ensure the recovery of a functional, intact, and otherwise whole ecosystem.

Evaluation and Publicity

Assessments are conducted to ensure the satisfaction of project objectives and goals. The project is publicized for public and technical consumption.

48. Assess monitoring data to determine whether performance standards are met and project objectives are attained. The results of data analysis should be documented in writing. If performance standards are not met within a reasonable period of time, refer to Guideline #47. Guideline #48 is ignored for smaller projects for which no performance standards were specified in Guideline #36.

49. Conduct an ecological evaluation of the newly completed project. This guideline requires satisfaction for those projects for which no performance standards were specified in Guideline #36. The evaluation should compare the restored ecosystem to its condition prior to the initiation of restoration activities (Guideline #20). The evaluation should determine whether or not the ecological goals from Guideline #5 were met, including the ecological attributes of restored ecosystems. Technical publication is normally the way that an evaluation is presented. To satisfy the requirements of scientific rigor that some journals expect, this evaluation may require more documentation of site conditions than those that are available from monitoring data. For that reason, an ecological investigation is apropos for all completed restoration projects. Some restoration projects are conducted by enduring institutions that have the capacity for follow-up investigations to provide a conservation perspective on the valued ecosystems after they have undergone restoration. To facilitate this possibility, care should be given to use inventory protocols that can be readily repeated for comparative purposes.

50. Determine whether cultural project goals were met. These goals were specified in Guideline #5.

51. Publicize and prepare written accounts of the completed restoration project. All too often, project personnel walk away from a completed project to begin another without stopping to consider the magnitude of their work and its benefits to the public and the environment. Sometimes a final report is required by contract or as a permit condition. Even if it is not, preparation of a final report is warranted to serve as an archival record of the project. The public deserves to be informed of a completed project and the benefits that accrue from it. News releases, media events, and public celebrations are all in order. Popular articles for public consumption can be prepared in non-technical language. Such publicity keeps ecological restoration in the public eye. If policy makers and politicians are aware of successfully completed projects, they will be more inclined to promote and fund new projects. Technical accounts of the project are equally important. Case histories become a treasure trove of information for all restoration practitioners who want to improve their professional proficiency. Case histories can be published in technical journals, trade journals, and posted on internet sites. Papers and posters can be presented at conferences.

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