Public Input on General Electric's November 23, 2022 Vernal Pool Pilot Study Selection Proposal

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From:	Jones, Michael T (FWE)
To:	R1Housatonic
Cc:	Schluter, Eve (FWE); Kubel, Jacob (FWE)
Subject:	Vernal Pool Pilot Study Selection Proposal
Date:	Monday, January 30, 2023 12:04:44 PM

To whom it may concern:

Thank you for the opportunity to comment on the Vernal Pool Pilot Study Selection Proposal submitted by AECOM on behalf of the General Electric Company (GE) pursuant to its final revised Resource Conservation and Recovery Act Corrective Action Permit for the Housatonic Rest of River area. We note that the Proposal includes a sample of 10 Certified Vernal Pools representing a range of average PCB concentrations, pool surface areas, and vegetative cover types while attempting to maximize accessibility, minimize proximity to relatively sensitive habitats in the surrounding area, and avoid Core Area 1 habitat altogether. In our opinion, the proposed sample of pools is weighted reasonably well to provide for a diversity of pool types with respect to PCB concentrations, pool surface areas, and vegetative cover types. In addition, the majority of the proposed sample of pools includes pools that appear to have a relatively "normal" hydroperiod as defined in the Proposal. At this time, we have no further substantive comments, but we expect to offer further comment on the selection of pools, the remediation technique to be applied to each, and post-remediation biological monitoring when specific study objectives and associated study design are described more fully in the anticipated Vernal Pool Pilot Study Work Plan.

Sincerely,
Mike Jones

cc: Jake Kubel and Eve Schluter, MassWildlife NHESP

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