GENERAL ELECTRIC/HOUSATONIC RIVER NATURAL RESOURCE RESTORATION

MASSACHUSETTS HOUSATONIC RIVER WATERSHED RESTORATION PROGRAM

FINAL ROUND 4 RESTORATION PLAN AND SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT

JANUARY 13, 2020

PREPARED BY:
STANTEC CONSULTING SERVICES INC.

FOR:
MASSACHUSETTS SUBCOUNCIL,
HOUSATONIC RIVER NATURAL RESOURCE TRUSTEES

U.S. Department of the Interior
Approval of the
Final Round 4 Restoration Plan/ Supplemental Environmental Assessment

General Electric/Housatonic River
Natural Resource Restoration

Massachusetts Housatonic River Watershed Restoration Program – Round 4

In accordance with U.S. Department of the Interior policy regarding documentation for natural resource damage assessment and restoration projects (521 DM3), the Authorized Official for the Department must demonstrate approval of draft and final Restoration Plans and their associated National Environmental Policy Act documentation, with concurrence from the Department's Office of the Solicitor.

The Authorized Official for the Housatonic River case is the Regional Director for the U.S. Fish and Wildlife Service's North Atlantic-Appalachian Region.

The Final Round 4 Restoration Plan/Supplemental Environmental Assessment (RP/SEA) is being released after public review and a 30-day public comment period on the Draft Round 4 RP/SEA. The Final Round 4 RP/SEA is hereby approved after consideration of the public comments received.

Approved:

01/13/2020

Wendi Weber Date
Acting Regional Director
North Atlantic-Appalachian Region
U.S. Fish and Wildlife Service

Concurred:

4/22/2019

Mark Barash Date
Senior Attorney
North Atlantic-Appalachian Region
Office of the Solicitor

UNITED STATES FISH & WILDLIFE SERVICE

ENVIRONMENTAL ACTION STATEMENT

Within the spirit and intent of the Council of Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA) and other statutes, orders and policies that protect fish and wildlife resources, I have established the following administrative record and have determined that the action of the *Final Round 4 Restoration Plan and Supplemental Environmental Assessment for the Massachusetts Housatonic River Watershed Restoration Program*:

____ is a categorical exclusion as provided by 516 DM 6 Appendix 1 and 516 DM 6, Appendix 1. No further documentation will therefore be made.

XX_ is found not to have significant environmental effects as determined by the attached Environmental Assessment and Finding of No Significant Impact.

____ is found to have significant effects, and therefore further consideration of this action will require a notice of intent to be published in the Federal Register announcing the decision to prepare an EIS.

____ is not approved because of unacceptable environmental damage, or violation of Fish and Wildlife Service mandates, policy, regulations, or procedures.

____ is an emergency action within the context of 40 CFR 1506.11. Only those actions necessary to control the immediate impacts of the emergency will be taken. Other related actions remain subject to NEPA review.

Other supporting documents (list):

Final Round 4 Restoration Plan and Supplemental Environmental Assessment for the Massachusetts Housatonic River Watershed Restoration Program

Programmatic Environmental Assessment for the Massachusetts Housatonic River Watershed Restoration Program

Acting Regional Director/DOI Authorized Official

01/13/2020
Date

FINDING OF NO SIGNIFICANT IMPACT

Final Round 4 Restoration Plan and Supplemental Environmental Assessment for the Massachusetts Housatonic River Watershed Restoration Program

The U.S. Department of the Interior and the Commonwealth of Massachusetts have completed a Final Round 4 Restoration Plan and Supplemental Environmental Assessment (RP/SEA) that explains how the Trustee SubCouncil for Massachusetts (SubCouncil) will use the approximately $1.45 million remaining in natural resource damages settlement funding to support restoration projects within the Housatonic River Watershed in Massachusetts. The Housatonic River Watershed Restoration Program is a multi-year, multi-phased restoration program that will restore, replace, and/or acquire the equivalent of the natural resources injured, destroyed, or lost as a result of contamination in the Housatonic River watershed originating from the General Electric facility in Pittsfield, Massachusetts. Round 4 is the fourth and final round of restoration funding. The restoration projects selected in Round 4 will focus on three restoration priority categories: Aquatic Biological Resources and Habitat, Wildlife Resources and Habitat, and Environmental Education and Outreach within the Housatonic River watershed in Massachusetts. The SubCouncil solicited restoration project proposals that would benefit a fourth restoration priority category, Recreational Uses, but no project proposals in this category were received.

The public was notified on April 16, 2019 of the availability of the Draft Round 4 RP/SEA for review and comment via an announcement on the SubCouncil's website (http://www.ma-housatonicrestoration.org/news.htm) and via a mass email to all interested parties from previous restoration solicitations. In addition, a public notice was published in two local newspapers, the Berkshire Eagle and the North Adams Transcript, and a copy of the notice was sent to the media outlets listed in Appendix B of the RP/SEA. On May 1, 2019 the Mass SubCouncil held a public information meeting at the Lenox Public Library to present the Draft Round 4 RP/SEA, answer questions, and receive public comments. Written public comments were accepted until May 15, 2019. The comments received did not cause the SubCouncil to make major changes regarding the funding process, nor did the comments cause any significant revisions to the RP/SEA, aside from minor modifications and clarifications.

Based on a review and evaluation of the information contained in the Final Round 4 RP/SEA, I have determined that the proposed actions do not constitute a major federal action that "would significantly affect the quality of the human environment" within the meaning of Section 102 (2)(c) of the National Environmental Policy Act (NEPA) of 1969. Accordingly, the preparation of an environmental impact statement on the proposed actions is not required at this time.

Kyle J. Kastler

Acting Regional Director DOI/Authorized Official

01/13/2020

Date

Executive Office of Energy and Environmental Affairs
Approval of the
Final Round 4 Restoration Plan/Supplemental Environmental Assessment

General Electric/Housatonic River
Natural Resource Restoration

Massachusetts Housatonic River Watershed Restoration Program – Round 4

In accordance with Trustee protocol regarding documentation for Natural Resource Damage Assessment and Restoration (NRDAR) projects, the Executive Office of Energy and Environmental Affairs (EEA) is providing its approval of the Final Round 4 Restoration Plan/Supplemental Environmental Assessment (RP/SEA) for the General Electric/Housatonic River Natural Resource Restoration.

The Final Round 4 RP/SEA is being released after public review and a 30-day public comment period on the Draft Round 4 RP/SEA. The MA SubCouncil hereby issues this Final Round 4 RP/SEA after consideration of public comments received.

Approved:

12/10/19
Kathleen A. Theoharides Date
Secretary
EEA
Natural Resource Trustee for the Commonwealth of Massachusetts

Recommending Approval:

11/15/2019
Paul W. Locke Date
Assistant Commissioner
Bureau of Waste Site Cleanup
Massachusetts Department of Environmental Protection

11/08/19
Thomas M. Potter Date
Trustee Representative
MA SubCouncil, Housatonic River Trustee Council
Massachusetts Department of Environmental Protection

Massachusetts SubCouncil Members*:*

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Non-Voting Advisors to the Massachusetts SubCouncil*:*

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(non-voting Federal Advisor)

Lead Federal Agency for Supplemental Environmental Assessment*:*

U.S. Fish and Wildlife Service

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TABLES

APPENDICES

ACRONYMS

ACOE	U.S. Army Corps of Engineers
ARPA	Archaeological Resources Protection Act
BEAT	Berkshire Environmental Action Team
BNRC	Berkshire Natural Resources Council
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
Chapter 91	Public Waterfront Act
CMR	Code of Massachusetts Regulations
Commonwealth	Commonwealth of Massachusetts
CTDEP	Connecticut Department of Environmental Protection
CTDEEP	Connecticut Department of Energy and Environmental Protection
CWA	Clean Water Act
DCR	Massachusetts Department of Conservation and Recreation
DFG	Massachusetts Department of Fish and Game
DFW	Massachusetts Division of Fisheries and Wildlife
DOI	Department of the Interior
EIR	Environmental Impact Report
EEA	Executive Office of Energy and Environmental Affairs
ENF	Environmental Notification Form
ESA	Endangered Species Act
FACA	Federal Advisory Committee Act
Focus Group	Land Acquisition Focus Group
FWCA	Fish and Wildlife Coordination Act
GAA	Grant Announcement and Application
GE	General Electric
GRT	Grant Review Team
HRR	Housatonic River Restoration, Inc.
HVA	Housatonic Valley Association

Mass Audubon	Massachusetts Audubon Society
MassDEP	Massachusetts Department of Environmental Protection
MassGIS	Massachusetts Geographic Information System
MBTA	Migratory Bird Treaty Act
MEPA	Massachusetts Environmental Policy Act
MESA	Massachusetts Endangered Species Act
MA SubCouncil	Massachusetts SubCouncil of the Housatonic River Natural Resource Trustees
MOA	Memorandum of Agreement
M.G.L.	Massachusetts General Laws
NEPA	National Environmental Policy Act
NFWF	National Fish and Wildlife Foundation
NHESP	Massachusetts Natural Heritage and Endangered Species Program
NOAA	National Oceanic and Atmospheric Administration
NRCS	Department of Agriculture's Natural Resource Conservation Service
NRD	Natural Resource Damages
NRDAR	Natural Resource Damage Assessment and Restoration
PCBs	Polychlorinated biphenyls
PEA	Programmatic Environmental Assessment
PEDA	Pittsfield Economic Development Authority
Restoration Program	Massachusetts Housatonic River Watershed Restoration Program
RP	Restoration Plan
RPS	Restoration Planning Strategy
RPSP	Restoration Project Selection Procedure
SEA	Supplemental Environmental Assessment
Stantec	Stantec Consulting Services Inc.
Trustees	Natural Resource Trustees
Trustee Council	Housatonic River Natural Resource Trustees
U.S.C.	United States Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service

USGS	U.S. Geological Survey
Woodlot	Woodlot Alternatives, Inc.
Woodlot and IEc	Woodlot Alternatives, Inc. and Industrial Economics
WPA	Wetlands Protection Act

1 INTRODUCTION

The U.S. Fish and Wildlife Service (USFWS) and the Massachusetts Executive Office of Energy and Environmental Affairs (EEA) (collectively, the "Massachusetts SubCouncil" [MA SubCouncil] of the Housatonic River Natural Resource Trustees [Trustee Council]) are working together to restore injured natural resources and resource services[1] resulting from the release of polychlorinated biphenyls (PCBs) and other hazardous substances from General Electric's (GE's) facility in Pittsfield, Massachusetts. To achieve this purpose, the MA SubCouncil created a Massachusetts Housatonic River Watershed Restoration Program (Restoration Program) whereby local groups and citizens from the watershed can participate in planning and implementation of compensatory restoration. Compensatory restoration projects are projects that restore, rehabilitate, replace, and/or acquire the equivalent of injured natural resources and/or the services provided by those resources.

The MA SubCouncil developed a Restoration Planning Strategy (RPS; Woodlot and IEc. 2005a) that developed a framework for planning and implementing the Restoration Program. Following development of the RPS, the MA SubCouncil developed a Restoration Project Selection Procedure (RPSP; Woodlot and IEc 2005b) that described the programmatic goals and priorities of the Restoration Program and established processes for soliciting, evaluating, and selecting individual restoration projects. Subsequently, the MA SubCouncil completed a Programmatic Environmental Assessment (PEA) for the Restoration Program which evaluated potential strategies for accomplishing restoration.

The Restoration Program is structured to achieve restoration through several funding rounds, three of which have been accomplished to-date. Ten restoration projects were funded as part of the Round 1 Restoration Plan / Supplemental Environmental Assessment (RP/SEA) released in October 2007 (Round 1); four habitat restoration projects were funded in the Round 2 RP/SEA released in June 2011 (Round 2); and six restoration projects were funded as part of the two subrounds of the Round 3 RP/SEA released in May 2013 (Round3). Table 1 presents a summary of NRD funding under Rounds 1-3.

[1] The term "services" in this document means the physical and biological functions performed by the resource including human uses of these functions. These services are the result of the physical, chemical, or biological quality of the resource (43 CFR § 11.14(nn)). "Services" includes provision of habitat, food, and other needs of biological resources, recreation, other products or services used by humans, flood control, ground water recharge, waste assimilation, and other such functions that may be provided by natural resources (43 CFR § 11.71(e)).

Table 1: Summary of Round 1-3 NRD Funding

Funding Round	Number of Projects Funded	NRD Funding Awarded
Round 1	10	$4,044,868.11
Round 2	4	$1,066,561.74
Round 3	6	$2,398,247.00
Total Round 1-3 Funding		**$7,509,676.85**

On August 6, 2018, the MA SubCouncil issued the Grant Announcement and Application (GAA) for Round 4 of the Restoration Program, soliciting applications for a fourth round of restoration projects and targeting approximately $1,450,000 in available funding for restoration and/or land acquisition[2] projects in Round 4 of the Restoration Program. This RP/SEA for Round 4 of the Restoration Program (Final Round 4 RP/SEA) presents the MA SubCouncil's selected compensatory restoration projects (Preferred Alternative) for Round 4 of the Restoration Program. Collectively, this document and the PEA also comprise the National Environmental Policy Act (NEPA) documentation for Round 4 of the Restoration Program. The approach of round specific SEAs tiered from the PEA is consistent with the general tiering approach for Environmental Impact Statements described in 40 Code of Federal Regulations (CFR) 1502.20.

1.1 NATURAL RESOURCE TRUSTEES RESPONSIBILITIES UNDER FEDERAL AND STATE LAW REGARDING RESTORATION PLANNING

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended, 42 United States Code (U.S.C.) § 9601 *et seq.*, the Clean Water Act (CWA), 33 U.S.C. §§ 1251-1376, and the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, Massachusetts General Laws (M.G.L.) Ch. 21E, provide a mechanism for state and federal governments to address natural resource damages (NRD). These acts provide that states, federally recognized tribes, and certain federal agencies, known as Natural Resource Trustees (Trustees), may assess damages to natural resources and may seek to recover those damages on behalf of the public. Trustees can bring claims against responsible parties for damages in order to restore, replace, or acquire the equivalent of natural resources that have been injured or lost by the release of hazardous substances. According to CERCLA and its associated natural resource damage assessment regulations (43 CFR §11), the MA SubCouncil must prepare a Restoration Plan that describes how NRD funds collected from responsible parties will be used to address injured natural resources, specifically what restoration, rehabilitation, replacement, or acquisition of the equivalent resources will occur. No restoration projects, except emergency restoration, can be implemented before the Restoration Plan

[2] References in this document to "land acquisition projects" refer to projects that protect habitat in perpetuity through means that may include fee title (e.g., fee simple acquisition), conservation easement, or dedication.

and a public comment process is completed. This document is the Final Restoration Plan for Round 4 of the Restoration Program.

The NEPA and its implementing regulations, 40 CFR §§1500-1508, require that federal agencies fully consider the environmental impacts of their proposed decisions on major federal actions, that appropriate steps are taken to mitigate potential environmental impacts of those actions, and that such information is made available to the public. The Massachusetts Environmental Policy Act (MEPA), M.G.L. Ch. 30, sections 61 through 62H, inclusive, and the associated regulations, 301 Code of Massachusetts Regulations (CMR) § 11.00, "provide meaningful opportunities for public review of the potential environmental impacts of projects for which Agency Action is required, and to assist each Agency in using…all feasible means to avoid Damage to the Environment or, to the extent Damage to the Environment cannot be avoided, to minimize and mitigate Damage to the Environment to the maximum extent practicable" (301 CMR § 11.01).

This document, in combination with the PEA, addresses programmatic NEPA and MEPA requirements for Round 4 of the Restoration Program. If individual Round 4 projects trigger MEPA thresholds, they will then be required to proceed through a MEPA review. Likewise, some projects may require additional NEPA analysis once the details of the restoration project are further defined (e.g., after the completion of the feasibility/planning portion of the project). If additional NEPA analysis is required, it will need to be completed before project implementation.

1.2 SUMMARY OF NATURAL RESOURCE DAMAGES SETTLEMENT

GE reached a comprehensive agreement on October 7, 1999, concerning NRD and cleanup of its Pittsfield, Massachusetts, facility, certain off-site properties, and the Housatonic River. The agreement was reached with the following entities: the U.S. Environmental Protection Agency (USEPA); the U.S. Department of Justice; the Commonwealth of Massachusetts (Commonwealth) Department of Environmental Protection (MassDEP), Office of the Attorney General, EEA; the State of Connecticut Department of Environmental Protection (CTDEP)[3], Office of the Attorney General; the Department of the Interior (DOI); the National Oceanic and Atmospheric Administration (NOAA) of the U.S. Department of Commerce; the City of Pittsfield, Massachusetts; and the Pittsfield Economic Development Authority (PEDA).

Terms of the agreement were incorporated in a Consent Decree, which was approved by the U.S. District Court on October 27, 2000. As part of the settlement, the Trustee Council recovered $15 million from GE as NRD for use in natural resource restoration projects, approximately half of which ($7.5 million) the Trustee Council targeted for restoration projects in Massachusetts.

[3] Formally CTDEP, this entity is now the State of Connecticut Department of Energy and Environmental Protection (CTDEEP). As described subsequently in this document, CTDEEP remains a member of the Trustee Council.

Further detail regarding the Settlement is provided in Chapter 1.0 of the PEA, Chapters 1.0 and 2.0 of the RPS (Woodlot and IEc 2005a), and Chapter 1 of the RPSP.

1.3 SUMMARY OF SITE INJURIES AND PUBLIC LOSSES

GE owned and operated a 254-acre facility in Pittsfield, Massachusetts, where PCBs were used in the manufacture of electrical transformers from the late 1930s to the late 1970s (Roy F. Weston, Inc. 1998). During this time period, hazardous substances were released from the GE facility to the Housatonic River and Silver Lake in Pittsfield. Identified hazardous substances include PCBs, dioxins, furans, volatile organic compounds, semi-volatile organic compounds, and inorganic constituents (e.g., metals). In addition, a number of former oxbows along the Housatonic River that were filled when the U.S. Army Corps of Engineers (ACOE) straightened the Pittsfield reach of the Housatonic River to alleviate flooding were found to contain PCB-contaminated soils and fill. Further detail regarding the site injuries and public losses is provided in Chapter 3.0 of the PEA.

1.4 RESTORATION OBJECTIVES

The Purpose and Need for the MA SubCouncil's Restoration Program are explained in the PEA. The overall purpose of the Restoration Program is to make the environment and the public whole for injuries to natural resources and services resulting from the release of hazardous substances. Restoration efforts are intended to return injured natural resources and services to baseline conditions and compensate for interim losses through implementation of restoration actions that restore, rehabilitate, or replace equivalent natural resources and/or services.

Consistent with the nature and scope of the natural resource injuries in the Housatonic River watershed, the potential restoration actions are also diverse. The MA SubCouncil identified four restoration priority categories:

1. Aquatic biological resources and habitat;
2. Wildlife resources and habitat;
3. Recreational uses of natural resources; and
4. Environmental education and outreach.

In the PEA, the MA SubCouncil evaluated strategies for accomplishing restoration within the Restoration Program, including a "No Action" alternative, and identified a preferred strategy. The preferred strategy was to implement projects in all four restoration priority categories (Alternative 6, "Blended Restoration Approach," in the PEA). The approach adopted by the MA SubCouncil considers the cumulative results of multiple rounds of funding to achieve the Blended Restoration Approach. The programmatic goals and objectives of the MA SubCouncil, as first described in the RPSP, are listed below:

- Restore, enhance, protect, conserve, replace and/or acquire the equivalent of natural resources and services that were injured as a result of the release of hazardous substances, including PCBs, in the Housatonic River environment;
- Provide for sustainable and measurable benefits to injured natural resources and services;
- Avoid adverse impacts resulting from restoration projects;
- Integrate public participation in the restoration process;
- Implement a suite of projects that cumulatively:
  - Benefit each of the restoration priority categories and
  - Employ a variety of restoration project types;
- Conduct restoration projects in a phased manner so that projects with a potential to interact with yet-to-be-determined remedial activities are not excluded from funding until those potential interactions can be determined (i.e., the remedial actions are known).

1.5 COORDINATION AND SCOPING

1.5.1 Trustee Council Organization and Activities

The Trustee Council consists of the EEA, the CTDEEP, the DOI (acting through the USFWS), and NOAA. A Memorandum of Agreement (MOA) among these parties was executed in January 2002. The MOA ensures the coordinated handling of activities relating to cleanup, remediation, and restoration activities in the Housatonic River environment. The MOA also provides a framework for intergovernmental coordination within the Trustee Council and for implementation of Trustee Council responsibilities under CERCLA and other applicable federal, state, and common laws.

The MOA provided for the establishment of the MA SubCouncil, which is responsible for authorizing the expenditure of NRD monies allocated to the geographic region of Massachusetts.

The MA SubCouncil currently consists of the following:

- Thomas M. Potter, MassDEP[4] (voting member, State Trustee)
- Molly Sperduto, USFWS (voting member, Federal Trustee)

[4] Designated by the Governor, the Secretary of the EEA, as the Commonwealth's Trustee, has the authority under state and federal environmental statutes to bring an action or claim for liability against a responsible party for natural resource damages resulting from a release or threat of release of oil or hazardous substances within Massachusetts and its waters. Within the EEA, the MassDEP administers the NRD Program.

NOAA has chosen to forgo its decision-making role on the MA SubCouncil pursuant to an October 2004 resolution to the MOA.

The MA SubCouncil is also advised by a non-voting Federal Advisor (Dean Tagliaferro, USEPA). This non-voting Federal Advisor facilitates coordination with remedial activities.

1.5.2 Public Notification

Local public libraries, newspapers, radio, and television are used as outlets for public announcements related to the Restoration Program. Libraries where public documents are sent are listed in Appendix A. Newspaper, and radio and television stations used for public outreach are listed in Appendix B. In addition, the MA SubCouncil created a website (www.ma-housatonicrestoration.org) to provide public access to background information, MA SubCouncil member contact information, program activity updates, draft documents for public review and comment, and final documents.

1.5.3 Restoration Planning Record

The Restoration Planning Record, a publicly available record of the restoration planning process, is available at designated public libraries in Berkshire County (see list of designated libraries and addresses in Appendix A) and on the MA SubCouncil website (www.ma-housatonicrestoration.org).

1.6 BACKGROUND AND DETAILS OF ROUNDS 1 - 4 OF THE RESTORATION PROGRAM

The following sections of this document summarize the previous funding rounds of the Restoration Program (Rounds 1-3) and provide background for the fourth round of Restoration Program funding (Round 4).

1.6.1 Round 1 of the Restoration Program

Round 1 of the Restoration Program provided grants to projects in the four restoration priority categories (Aquatic Biological Resources and Habitat, Wildlife Resources and Habitat, Recreational Uses, and Environmental Education and Outreach), resulting in a foundation of projects that cumulatively contribute to the objectives of the Blended Restoration Approach. The MA SubCouncil provided a total of $4,044,868.11 to ten projects in Round 1 that, to date, have restored more than 100 acres of wetland, floodplain, and riparian habitat; protected more than 175 acres of riparian, wetland, and upland habitat; and created 2 miles of riverfront trails as well as enhanced the protection of rare species throughout the watershed; provided environmental education and river experiences to 5,366 elementary and middle school students and more than 100 high school students; introduced 824 members of the public to the Housatonic River through interpretive canoe trips; and provided training and technical assistance to 20 Conservation Commissions that led to protection of more than 90 river miles, 10,000 wetland acres, and 9,500 upland acres (Table 2). Additional details related to Round 1 of the Restoration Program may be found in the Final Round 1 RP/SEA.

Table 2: Summary of Round 1 NRD Funding by Restoration Priority Category

Restoration Priority Category	Number of Projects Funded	NRD Funding Awarded
Aquatic Biological Resources and Habitat	2	$1,426,950.00
Wildlife Resources and Habitat	3	$959,044.11
Recreational Uses	3	$792,385.00
Environmental Education and Outreach	2	$866,489.00
	Round 1 Funding	**$4,044,868.11**

1.6.2 Round 2 of the Restoration Program

For Rounds 2 and 3 of the Restoration Program, the MA SubCouncil decided to emphasize aquatic and terrestrial *habitat protection* through habitat restoration and land acquisition projects. The narrowed focus of Rounds 2 and 3 was based on feedback from applicants, agencies, and non-profit organizations during Round 1 and the MA SubCouncil's objective to focus on additional benefits to natural resources, from which the services of recreation and other uses are derived. Initially it was conceived that Round 2 would accommodate *both* habitat restoration and land acquisition projects; subsequently, it was decided to separate these two focuses into two separate Rounds. Accordingly, Round 2 funded habitat restoration projects, and Round 3 funded land acquisition projects. Selected projects as part of Rounds 2 and 3 were in the restoration priority categories of Aquatic Biological Resources and Habitat and Wildlife Resources and Habitat.

In Round 2, the MA SubCouncil provided a total of $1,066,561.74 to four projects in the two identified restoration priority categories (Table 3). The funded Round 2 projects have, to date, inventoried more than 485 stream crossings, replaced one stream crossing on a high-value coldwater stream, restored riparian and floodplain habitat and controlled invasive species on more than 300 acres of land; and provided educational programming to more than 1,200 area residents and schoolchildren in association with the Sackett Brook Restoration Project / Gravesleigh Pond Dam Removal project. In addition to the four projects funded as a part of Round 2, an additional $10,000 of NRD funding was provided for supporting studies including a hydraulic assessment by the U.S. Geological Survey (USGS).

Table 3: Summary of Round 2 NRD Funding by Restoration Priority Category

Restoration Priority Category	Number of Projects Funded	NRD Funding Awarded
Aquatic Biological Resources and Habitat	2	$606,386.42
Wildlife Resources and Habitat	2	$450,175.32
Round 2 Restoration Project Funding		$1,056,561.74
Supporting Studies Funded as a part of Round 2		$10,000.00
Total NRD Funding in Round 2		**$1, 066,561.74**

Additional details related to Round 2 of the Restoration Program may be found in the Final Round 2 RP/SEA.

1.6.3 Round 3 of the Restoration Program

Prior to initiating Round 3 of the Restoration Program, a public informational meeting was held in Lenox, Massachusetts, on October 21, 2008, to present, discuss, and receive feedback on criteria relevant to the evaluation and selection of land acquisition applications. Organizations that attended this meeting (the "Land Acquisition Focus Group" [Focus Group]) included the Massachusetts Audubon Society (Mass Audubon), the Massachusetts Department of Conservation and Recreation (DCR), the Massachusetts Department of Fish and Game (DFG), the Berkshire Natural Resources Council (BNRC), the Trustees of Reservations, the Town of Lenox, the Housatonic Valley Association (HVA), the Stockbridge Land Trust, the City of Pittsfield, the Berkshire Environmental Action Team (BEAT), Project Native, The Nature Conservancy, the Sheffield Land Trust, the EEA, and the USFWS.

The Focus Group identified attributes that it considered to be important for the purpose of evaluating land acquisition applications and identified how these attributes aligned with the selection criteria outlined in the RPSP. The noted attributes largely fit within the selection criteria outlined within the RPSP, and the MA SubCouncil therefore did not revise the original Evaluation Criteria described in the RPSP. The results of the Focus Group meeting are summarized in the December 9, 2008, Round 2 Land Protection Summary of Housatonic River Natural Resource Damages Restoration Process memorandum (Stantec 2008).

A change between the first two rounds of funding (Rounds 1 and 2) and Round 3 was that the Final RP/SEA for Round 3 was issued prior to the solicitation for Round 3 project applications. This change was made because it was determined that funding disbursement to land acquisition projects could be expedited through this approach and because it was concluded that confidentiality between land owners (or land rights owners) and potential purchasers can be important to land transaction negotiations and

that these negotiations could be adversely affected by public disclosure of project- or parcel-specific information.

The framework and procedures for soliciting, evaluating, and selecting Round 3 land acquisition projects was developed by the MA SubCouncil based on input from the Focus Group and is documented in detail in the Final Round 3 RP/SEA.

In Round 3, through two subrounds of funding, the MA SubCouncil provided a total of $2,398,247 to six land acquisition projects in the two identified restoration priority categories (Aquatic and Biological Resource and Habitat and Wildlife Resources and Habitat; Table 4). Note that Table 4 presents the funded Round 3 projects with the two restoration priority categories combined, reflecting that the projects funded in this round benefited both restoration priority categories. The funded Round 3 projects resulted in protection of more than 650 acres of wetland, floodplain, riparian and adjacent upland habitat. Additional details related to Round 3 of the Restoration Program may be found in the Final Round 3 RP/SEA and November 15, 2016, Amendment to the Final Round 3 RP/SEA.

Table 4: Summary of Round 3 NRD Funding by Restoration Priority Category

Restoration Priority Category	Number of Projects Funded	NRD Funding Awarded
Aquatic Biological Resources and Habitat & Wildlife Resources and Habitat	6	$2,398,247.00
	Round 3 Funding	**$2,398,247.00**

1.6.4 Round 4 of the Restoration Program

Similar to Round 1 of the Restoration Program, Round 4 solicited applications for compensatory restoration projects in each of the four restoration priority categories, including Aquatic Biological Resources and Habitat, Wildlife Resources and Habitat, Recreational Uses, and Environmental Education and Outreach. Similar to Round 1, land acquisition project[5] applications were included as an eligible project type for Round 4.

As described in Sections 1.6.2 and 1.6.3, the MA SubCouncil solicited public comment on the process to be used to solicit and evaluate land acquisition applications prior to initiating Round 3 of the Restoration Program. The land acquisition processes that were identified as part of the Round 3 public process were also used for evaluation and selection of the proposed land acquisition projects in the Round 4. Due to the unique

[5] As with past rounds, it is a requirement that land acquired as part of this Restoration Program be protected in perpetuity (e.g., through fee title [fee simple acquisition], conservation restriction, or dedication).

sensitivities related to confidentiality, proposed land acquisition projects are identified in this document only by generic identifier (e.g., Land Acquisition Project #1) and, similar to Round 3, parcel-specific project applications and identifying information for Round 4 land acquisition projects will not be available until selected land acquisitions have been completed. The MA SubCouncil will publicly identify selected land acquisition projects, and compensatory restoration achieved, after funding has been awarded and the individual land acquisitions have been completed. This more confidential process for land acquisition projects is intended to accommodate land transaction negotiations that could be adversely affected by the public disclosure of certain information.

The following sections summarize public involvement conducted as a part of Round 4, applications received, and the MA SubCouncil's Preferred Alternative. Subsequent sections of this document present more detailed information regarding applications received, the Preferred Alternative, and public comments received on the Preferred Alternative.

1.6.4.1 Summary of Public Involvement for Round 4

The MA SubCouncil conducted several public meetings during the development of the Restoration Program to obtain public input on the overall strategy for restoration planning and the processes and criteria by which restoration project applications would be solicited and evaluated. Public involvement milestones relating to the early development of the overall Restoration Program and Rounds 1 - 3 are summarized in the PEA and Final RP/SEAs for Rounds 1 - 3.

Specific public involvement milestones related to Round 4 are summarized below:

- May 1, 2018: MA SubCouncil held an Open House and presentation of the Restoration Program, including a presentation of the proposed approach and timeline for Round 4 of the Restoration Program.
- June 26, 2018: MA SubCouncil held a Pre-Round 4 Grant Announcement and Application (GAA) Information Meeting to present the anticipated approach and timeline for Round 4.
- August 6, 2018: MA SubCouncil issued the Round 4 GAA to solicit restoration project applications for Round 4 of the Restoration Program.
- September 12, 2018: MA SubCouncil posted responses to questions submitted in response to the GAA.
- October 1, 2018: MA SubCouncil received 10 applications prior to the application deadline.
- January 18, 2019: MA SubCouncil posted the 10 submitted proposed project applications on its website for public informational purposes.
- April 16, 2019: Draft Round 4 RP/SEA released.

- May 1, 2019: Public Informational meeting at Lenox Public to present the Draft Round 4 RP/SEA.
- May 15, 2019: Public comments deadline for the Draft Round 4 RP/SEA.

1.6.4.2 Round 4 Applications

On August 6, 2018, the MA SubCouncil issued the Round 4 GAA soliciting proposals for projects in all four priority restoration categories and targeting $1,450,000 in funding. Prior to the Grant Application deadline on October 1, 2018, the MA SubCouncil received 10 restoration project applications with a total requested value of $2,169,471. Elements of the 10 proposed projects address each of the four restoration priority categories. Table 5 summarizes the 10 project applications received, including the assigned application number, the primary restoration priority category attributed to each[6], and the amount of NRD funding requested.

[6] Table 5 sorts projects by the *primary* restoration priority category addressed by each proposed project. As described in subsequent section of this document, secondary features of many proposed projects address additional restoration priority categories.

Table 5: Round 4 Applications Received and NRD Funding Requested (Presented by Restoration Priority Category)

Primary Restoration Priority Category	Application Number	Title	Requested NRD Funding
Aquatic Biological Resources and Habitat	402	*Churchill Brook Culvert Replacement*	$200,000
	406	*Land Acquisition Project #3*	$110,100
	405	*Calcareous Fen Restoration*	$290,000
	410	*Planning for Flood Resilient and Fish Friendly Road-Stream Crossings in the Berkshire Hills*	$125,675
	407	*Alford Springs Culvert Improvement Project*	$196,300[7]
Wildlife Resources and Habitat	404	*Land Acquisition Project #2*	$145,000
	403	*Land Acquisition Project #1*	$171,080[8]
	401	*Japanese Knotweed Control Along the Housatonic River*	$203,978
	409	*Land Acquisition Project #4*	$286,000
Environmental Education and Outreach	408	*Housatonic River Watershed Education Programs*	$441,338
Recreational Uses of Natural Resources	-	*[No projects were proposed in this category[9]]*	$0
		Total Requested Round 4 NRD Funding	**$2,169,471[10]**

Sections 3, 4, and 5 of this Final Round 4 RP/SEA document the solicitation and

[7] This amount is cited in the Project Budget Summary Form in the application but may be in error. Summing the Proposed Costs for the individual tasks suggests that the total requested NRD Funds for this proposed project (Application No. 407) may be $196,600.

[8] As described in Sections 4.2.2 and 10, following submittal of the application for Restoration Project 403, the requested NRD funding amount was reduced to $151,080 based on a $20,000 reduction in the cost of the land acquisition agreement negotiated between the applicant and the landowner.

[9] Several proposed projects categorized in the other three restoration priority categories include secondary features that address Recreational Uses of Natural Resources.

[10] As a result of a reduction in the requested amount of funding for Restoration Project 403 (see Table 6 and Sections 4.2.2 and 10), the total amount of requested NRD funding was subsequently reduced to $2,149,471.

evaluation of Round 4 applications, the selection of the Preferred Alternative and Non-Selected Project Applications, and potential environmental and socioeconomic impacts of the Preferred Alternative and Non-Selected Project Applications.

1.6.4.3 Round 4 Preferred Alternative

The MA SubCouncil's Preferred Alternative for Round 4 of the Restoration Program includes two tiers of projects. Tier 1 projects have top priority for funding. The potential for funding within Tier 2 will be decided by the MA SubCouncil based, in part, on the outcomes of Tier 1 projects and the MA SubCouncil's judgment regarding what actions may be most necessary and beneficial to compensate for natural resource injuries. Should adequate NRD funds exist once Tier 1 projects are implemented, the MA SubCouncil may use remaining funds to support Tier 2 projects. Tiers 1 and 2 are described in further detail in Section 4.

The MA SubCouncil selected six Tier 1 projects for the Preferred Alternative. The Tier 1 projects of the Preferred Alternative for Round 4 of the Restoration Program are presented in Table 6. This table presents the Tier 1 projects by primary restoration category and includes the NRD funding amount requested by the Applicant, additional contingency funding recommended by the MA SubCouncil (where applicable), and the total NRD allocation recommended by the MA SubCouncil. Additional information regarding the projects included in the Preferred Alternative is provided in Section 4.

Table 6: Summary of Preferred Alternative – Tier 1

Primary Restoration Priority Category	Application Number	Title	NRD Funding Requested by Applicant	Contingency Amount Recommended by the MA SubCouncil	Recommended NRD Allocation
Aquatic Biological Resources and Habitat	402	*Churchill Brook Culvert Replacement*	$200,000	$40,000	$240,000
	405	*Calcareous Fen Restoration*	$290,000	$58,000	$348,000
	406	*Land Acquisition Project #3*	$110,100	$0	$110,100
Wildlife Resources and Habitat	403	*Land Acquisition Project #1*	$151,080[11]	$0	$151,080[12]
	404	*Land Acquisition Project #2*	$145,000	$0	$145,000
Environmental Education and Outreach	408	*Housatonic River Watershed Education Programs*	$441,338	$1,600	$442,938
Recreational Uses	-	*[No projects were proposed in this category[13]]*	$0	$0	$0
Proposed Round 4 Funding (Tier 1)			**$1,337,518**	**$99,600**	**$1,437,118**

The MA SubCouncil identified one Tier 2 project under the Preferred Alternative: "Planning for Flood Resilient and Fish Friendly Road-Stream Crossings in the Berkshire Hills" (Application Number 410; Table 7). This project is categorized in restoration priority category Aquatic Biological Resource and Habitat and requested $125,675 in NRD funding.

[11] As described in Sections 4.2.2 and 10, the requested NRD funding amount stated in the Draft Round 4 RP/SEA was $171,080. This was subsequently reduced by $20,000 based on a stated reduction in the cost of the land acquisition agreement negotiated between the applicant and the landowner.
[12] As described in Sections 4.2.2 and 10, the recommended NRD funding allocation in the Draft Round 4 RP/SEA was $171,080. This was subsequently reduced by $20,000 based on a stated reduction in the cost of the land acquisition agreement negotiated between the applicant and the landowner.
[13] Multiple Tier 1 projects of the Preferred Alternative include secondary features that address Recreational Uses of Natural Resources, including Restoration Projects 403, 404, 405, 406 and 408.

Table 7: Summary of Preferred Alternative – Tier 2

Primary Restoration Priority Category	Application Number	Title	NRD Funding Requested by Applicant	Contingency Amount Recommended by the MA SubCouncil	Recommended NRD Allocation
Aquatic Biological Resources and Habitat	410	*Planning for Flood Resilient and Fish Friendly Road-Stream Crossings in the Berkshire Hills*	$125,675	$0	$125,675
Wildlife Resources and Habitat	-	*[No Tier 2 projects were selected in this category]*	-	-	$0
Environmental Education and Outreach	-	*[No Tier 2 projects were selected in this category]*	-	-	$0
Recreational Uses	-	*[No projects were proposed in this category]*	-	-	$0
Proposed Round 4 Funding (Tier 2)			**$125,675**	**$0**	**$125,675**

The Round 4 Preferred Alternative and Non-Selected Project Applications are each described in Sections 4 and 5 of this document, respectively.

2 AFFECTED ENVIRONMENT

This section briefly summarizes information presented in the PEA describing the biological and socioeconomic environment in which restoration projects would be implemented. The purpose of providing this information in the PEA was to summarize the conditions in the Housatonic River watershed and provide a foundation for assessing the impacts of the alternatives considered. The majority of the content on the affected environment in the PEA was drawn from the reports listed below. Readers who are interested in greater detail on the biological and socioeconomic features of the Housatonic River watershed may wish to consult these sources:

- Ecological Characterization of the Housatonic River (Woodlot 2002a). This report represents the most recent, comprehensive study of the biological environment surrounding the Housatonic River and focuses on the river reach from Pittsfield to Lee, Massachusetts. It was prepared for the USEPA.
- Ecological Characterization of the Housatonic River Downstream of Woods Pond (Woodlot 2002b). This report characterizes the biological environment from Lee, Massachusetts, to southern Connecticut. It was also prepared for the USEPA.
- Housatonic River 5-Year Watershed Action Plan (EEA 2003).

2.1 BIOLOGICAL ENVIRONMENT (SUMMARIZED FROM THE PEA)

The Massachusetts portion of the Housatonic River watershed is located in the southwestern region of the Commonwealth in Berkshire County and is bordered by the watersheds of the Hudson River to the north, the Westfield River to the northeast, and the Farmington River to the southeast. The Housatonic River watershed exhibits diverse hydrology, including swift streams, a meandering river, productive aquifers, extensive wetlands, and 119 lakes and ponds. Because of the varied topography of Berkshire County, ponds, peatlands, and marshes are abundant. An estimated three percent of the county is considered to be occupied by palustrine communities (i.e., wetlands not associated with rivers, lakes, or tidal waterbodies).

Most of the undeveloped landscape in the Housatonic watershed is forested, except where disturbance or permanent flooding (i.e., river channel and backwater slough) inhibit tree growth. Portions of the watershed have been cleared for various purposes, primarily agriculture, residences, and various rights-of-way (e.g., roads, railroads, power lines).

The Housatonic River watershed features a prolific biological community including rare plant and animal species, as well as the occurrence of significant natural communities. Analyses conducted for USEPA's ecological characterization identified 20 plants of state conservation concern that are known or thought to occur in the upper portion of the watershed, while a separate inventory developed for the Great Barrington Open Space Plan identified 23 additional species of concern. Approximately 173 species of bird, 42 species of mammal, 41 species of fish, 13 species of snake, and 7 species of turtle are

known to occur in the Massachusetts reach of the Housatonic River (Woodlot and IEc 2005b).

While the GE facility was identified as a significant source of pollution in the Housatonic River watershed, a variety of other water quality concerns have been identified, including pesticide and fertilizer runoff from agricultural land, management of household hazardous waste, indirect discharges from septic systems and landfills, pesticide runoff from railroad beds, and abandoned industrial facilities (HRR 1999). In addition to river pollution, lakes and ponds in the Housatonic watershed face advancing eutrophication issues associated with nutrient loading.

In addition to factors affecting water quality, other ecological stressors affect terrestrial and riparian habitat in the watershed. Residential and commercial development continues to diminish the quality and abundance of wildlife habitat. While the population of Berkshire County has decreased in the last decade, the number of housing units has grown, with at least some of this trend attributable to construction of vacation and retirement homes. Likewise, invasive species such as purple loosestrife (*Lythrum salicaria*) and other non-native plants crowd out native plants that provide forage for waterfowl and other wildlife.

2.2 SOCIOECONOMIC ENVIRONMENT (SUMMARIZED FROM THE PEA)

Eighteen towns and one city in Berkshire County are located wholly or partially in the Housatonic River watershed. Pittsfield is the largest municipality in Berkshire County and contained roughly one-third of the population of the county in 2006. Both Pittsfield and Berkshire County as a whole have experienced a decrease in population over the last decade; contributing factors include farm abandonment, loss of manufacturing jobs, and general migration to other population centers. The economy of the Housatonic River watershed was once heavily dependent upon manufacturing and timber harvesting, and the loss of jobs in these sectors still appears to affect economic well-being (i.e., the percent of families living below the poverty line in Pittsfield is significantly higher than in the balance of Berkshire County or in Massachusetts overall). The median income in the region is lower and the unemployment rate is higher than in Massachusetts as a whole.

Portions of the upper third of the Housatonic River watershed in Massachusetts, including Pittsfield, are urbanized, while the remaining two-thirds of the watershed are predominantly rural in character and largely forested. Current land uses in the watershed include industrial, agricultural, residential, and recreation/wildlife management. In much of Pittsfield, Lenox, and Lee, the river is used primarily as a natural area, with much of the area contained in the G. Darey Housatonic Valley State Wildlife Management Area and used primarily by outdoor recreation enthusiasts.

3 RESTORATION EVALUATION PROCESS AND CRITERIA

The Round 4 GAA described the solicitation and evaluation of applications and is based on the general framework developed in the RPSP as supplemented by the specific framework for land acquisition applications developed for Round 3 of the Restoration Program.

As summarized in Section 1.6.4 of this document, land acquisition applications have unique sensitivities related to confidentiality and the MA SubCouncil solicited public comment on the process to be used to solicit and evaluate land acquisition applications prior to initiating Round 3 of the Restoration Program. The land acquisition processes that were identified as part of the Round 3 public process were used for evaluation of proposed land acquisition projects and selection of the proposed land acquisition projects included in the Round 4 Preferred Alternative.

The following sections of this document summarize the process used to evaluate Round 4 compensatory restoration project applications and the results of these evaluations.

3.1 EVALUATION PROCESS AND CRITERIA

CERCLA and NRD regulations require that restoration activities restore, rehabilitate, replace, or acquire the equivalent of the resources and services that were injured or lost, but do not address which restoration projects are preferred. Such decisions are left to the discretion of the MA SubCouncil; however, DOI regulations recommend the following factors to be considered in the evaluation and selection of preferred alternatives (43 CFR § 11.82).

1. Technical feasibility;
2. The relationship of the expected costs of the proposed actions to the expected benefits from the restoration, rehabilitation, replacement, and/or acquisition of equivalent resources;
3. Cost-effectiveness;
4. The results of any actual or planned response actions;
5. Potential for additional injury resulting from the proposed actions, including long-term and indirect impacts, to the injured resources or other resources;
6. The natural recovery period;
7. Ability of the resources to recover with or without alternative actions;
8. Potential effects of the action on human health and safety;
9. Consistency with relevant federal, state, and tribal policies; and
10. Compliance with applicable federal, state, and tribal laws.

The MA SubCouncil previously developed an RPSP and PEA that describe the processes for soliciting, evaluating, and selecting individual restoration projects (Woodlot and IEc 2005b). The MA SubCouncil incorporated the ten factors described above into the Threshold and Evaluation Criteria described in the RPSP as a component of the Restoration Program framework for evaluating and selecting restoration projects.

The MA SubCouncil issued the Round 4 GAA on August 6, 2018, soliciting applications for Round 4 of the Restoration Program, and received 10 applications prior to the deadline on October 1, 2018. Project applications were subsequently evaluated via a two-stage process described below. The applications that passed Stage One (Threshold Criteria) advanced to Stage Two (Evaluation Criteria), following which the proposed projects included in the Preferred Alternative were selected.

3.1.1 Stage One: Threshold Criteria

The first stage (Stage One) in evaluating proposed projects was to identify whether applications met the minimum requirements for consideration. These "Threshold Criteria," listed below, were consistent with the goals of the MA SubCouncil, federal regulations, and other applicable federal, state, and local regulations and laws. Threshold Criteria are described in detail in the RPSP and include:

1. Does the application contain the information necessary to proceed with an evaluation as described in the RPSP? (Answer must be "YES" to pass.)
2. Does the proposed project restore, rehabilitate, replace, and/or acquire the equivalent of natural resources or natural resource services that were injured by the release of PCBs or other hazardous substances? (Answer must be "YES" to pass.)
3. Is the proposed project, or any portion of the proposed project, an action that is presently required under other federal, state, or local law? (Answer must be "NO" to pass.)
4. Is the proposed project, or any portion of the proposed project, inconsistent with any federal, state, or local law, regulation, or policy? (Answer must be "NO" to pass.)
5. Will the proposed project, in terms of its cost, be consistent with the stated goals of the MA SubCouncil to retain sufficient funds to 1) accomplish restoration over at least three rounds of proposal solicitations and 2) serve a wide geographic area that benefits the restoration priority categories? (Answer must be "YES" to pass.)
6. Will the proposed project, or any portion of the proposed project, be inconsistent with any ongoing or anticipated remedial actions (i.e., primary restoration) in the Housatonic River watershed? (Answer must be "NO" to pass.)

The Trustee representatives of the MA SubCouncil were solely responsible for determining whether a proposed project met the Threshold Criteria. Each of the ten Round 4 proposed projects met the Threshold Criteria and advanced to Stage Two of the evaluation process.

3.1.2 Stage Two: Evaluation Criteria

At the completion of Stage One, project applications that met the Threshold Criteria were reviewed and evaluated by the Grant Review Team (GRT). The GRT consisted of staff from departments within EEA, USFWS, and Stantec Consulting Services Inc. (Stantec), representing a range of technical expertise and relevant experience, including expertise relevant to the MA SubCouncil's priority restoration categories. No Round 4 GRT members represented entities listed as the applicant for proposed Round 4 restoration projects or entities which had submitted letters of support for proposed Round 4 restoration projects.

The rating system developed in the RPSP was used to apply the Evaluation Criteria to each application. Each rating was associated with a number of points that varied depending on the question, allowing certain criteria to be weighted more heavily than others. Project applications were evaluated and scored individually using the following categories of criteria. Detailed explanations of the Evaluation Criteria and rating system are provided in the RPSP.

- Relevance and Applicability of Project
  - Natural Recovery Period
  - Location of Project
  - Sustainable Benefits
  - Magnitude of Ecological Benefits
  - Human Health and Safety
  - Benefits to Multiple Restoration Categories
  - Enhancement of Remediation/Response Actions
- Technical Merit
  - Technical/Technological Feasibility
  - Technical Capacity of Applicant and Project Team
  - Potential for Adverse Environmental Impacts
  - Measurable Results
  - Contingency Actions
  - Administrative Capacity of Applicant and Project Team
- Project Budget
  - Relationship of Expected Costs to Expected Benefits
  - Implementation-oriented
  - Budget Justification and Understanding

  - Leveraging of Additional Resources
  - Coordination and Integration
  - Comparative Cost-effectiveness

- Socioeconomic Merit
  - Enhancement of Public's Relationship with Natural Resources
  - Fostering Future Restoration and Stewardship
  - Community Involvement
  - Potential for Adverse Socioeconomic Impacts
  - Complementary with Community Goals
  - Public Outreach
  - Diverse Partnerships

Each reviewer independently applied the Evaluation Criteria to the ten project applications and arrived at an individual score for each project. The GRT then met to discuss the merits of each proposed project and to derive a single, consensus-based score for each application. The reviews of each application were summarized in evaluation summary memoranda that include the consensus-based score for the project, the GRT's rationale for the final consensus-based scores, individual scores provided by each reviewer, and the agency affiliation of each GRT member assigned to the project application. The consensus-based scoring, combined with independent analysis, were used by the MA SubCouncil in selecting the proposed projects included in the Preferred Alternative.

Following public review and comment on the Draft Round 4 RP/SEA, selected land acquisition projects advanced to a final phase of due diligence analysis. If results of the due diligence analysis indicated that land acquisition of a particular parcel(s) did not appear feasible, the proposed project would not receive additional funding and would be eliminated from further consideration. Following review of due diligence materials for land acquisition applications, those that the MA SubCouncil retained as part of the Preferred Alternative are included in the Final RP/SEA.

3.2 THRESHOLD AND EVALUATION CRITERIA RESULTS

3.2.1 Threshold Criteria Results

Each of the 10 applications received in response to the Round 4 GAA were determined by the MA SubCouncil to meet the Threshold Criteria.

3.2.2 Evaluation Criteria Results

The GRT's consensus-based scores are summarized in Table 8. These scores were advisory to the MA SubCouncil. The MA SubCouncil identified the proposed projects included in the Preferred Alternative by considering the GRT scores, public comment provided in letters of support submitted with applications, independent analysis of the applications and the goals of the Restoration Program, and consideration of written public comments received during the 30-day public comment period for the Draft Round 3 RP/SEA. Summaries of the consensus-based evaluation scores are included in Appendix C.

Similar to Round 3, parcel-specific project applications and identifying information for Round 4 land acquisition projects will not be available for public review and comment before selected land acquisitions have been completed; accordingly, proposed land acquisition projects are identified in this document only by generic identifier (e.g., Land Acquisition Project #1). As described above, this more confidential process for land acquisition projects is intended to accommodate land transaction negotiations that could be adversely affected by the public disclosure of certain information. However, selected Round 4 land acquisition applications must score highly on the Evaluation Criteria (see Section 3.1.2); thus, one can predict by examining the high-scoring elements of the Evaluation Criteria, what the attributes of preferred land acquisition projects are likely to be. The MA SubCouncil will publicly announce the selected Round 4 land acquisition projects, and the compensatory restoration achieved, after land transaction negotiations for the selected projects have been completed.

Table 8: Review Team Consensus-Based Scores (Rank-Order by Restoration Priority Category)

Primary Restoration Priority Category	Application Number	Title	Consensus Evaluation Score
Aquatic Biological Resources and Habitat	402	*Churchill Brook Culvert Replacement*	242
	406	*Land Acquisition Project #3*	241
	405	*Calcareous Fen Restoration*	220
	410	*Planning for Flood Resilient and Fish Friendly Road-Stream Crossings in the Berkshire Hills*	202
	407	*Alford Springs Culvert Improvement Project*	187
Wildlife Resources and Habitat	404	*Land Acquisition Project #2*	237
	403	*Land Acquisition Project #1*	222
	401	*Japanese Knotweed Control Along the Housatonic River*	186
	409	*Land Acquisition Project #4*	186
Environmental Education and Outreach	408	*Housatonic River Watershed Education Programs*	253
Recreational Uses of Natural Resources	-	*[No projects were proposed in this category]*	-

Section 4 of this document presents summary information for each of the proposed projects selected as a part of the Preferred Alternative, and Section 5 of this document presents summary information for each of the Non-Selected Project Applications.

4 PREFERRED ALTERNATIVE

Consistent with the nature and scope of the natural resource injuries identified by the Trustees, the potential restoration actions are also diverse. The "No Action" (or "Natural Recovery") alternative was evaluated in the PEA and was not identified as the Preferred Alternative (see the PEA for additional information). The PEA identified a "Blended Restoration Approach" (Alternative 6) as the preferred strategy to achieve compensatory restoration. The "Blended Restoration Approach" implements projects in the four identified restoration priority categories (Aquatic Biological Resources and Habitat, Wildlife Resources and Habitat, Recreational Uses of Natural Resources, and Environmental Education and Outreach). The Round 4 GAA solicited projects in each of the four restoration priority categories, supporting the Blended Restoration Approach identified in the PEA.

The results of Evaluation Criteria scoring were used by the MA SubCouncil to provide an initial ranking of applications. Subsequently, the diversity and magnitude of potential benefits associated with specific applications, the NRD funding requested in the applications, and public comments received during the 30-day public comment period on the Draft Round 4 RP/SEA were evaluated by the MA SubCouncil. The Preferred Alternative presented in this Final Round 4 RP/SEA incorporates six, Tier 1 applications selected from the ten applications received in response to the Round 4 GAA.

Projects in Tier 1 are the MA SubCouncil's top priority for funding in Round 4 of the Restoration Program. Potential funding for projects within Tier 2 will be decided by the MA SubCouncil based, in part, on the outcomes of Tier 1 projects and MA SubCouncil's judgments regarding what actions are most necessary and beneficial to compensate for the suite of natural resource injuries. Should adequate NRD funds exist once Tier 1 projects are implemented, the Trustees may use remaining funds to support Tier 2 projects. Tier 2 projects are not guaranteed funding. The MA SubCouncil may choose to wait to fund some or all Tier 2 projects until they have greater certainty regarding costs for the Tier 1 projects.

Sections 4.1 through 4.4 present the Preferred Alternative Tier 1 projects and Sections 4.5 through 4.8 present the Tier 2 project. The PEA evaluated the anticipated environmental and socioeconomic impacts associated with the Blended Restoration Approach. A summary of impacts of the Round 4 Preferred Alternative is provided in Section 4.9. Compliance of the Preferred Alternative projects with federal, state and local laws, regulations, policies, and directives is addressed in Section 6.

The MA SubCouncil reserves the right to modify the scope of the Preferred Alternative and associated funding amounts at the time that funding agreements are established. The MA SubCouncil may also identify the potential need for contingency funding in association with implementation or other phases of proposed projects. Where applicable, scope and funding modifications that have been requested to-date by the MA SubCouncil, including allocation of contingency funding, are addressed in the following sections.

For purposes of protecting the confidentiality of realty negotiations, as described above, parcel-specific information for proposed land acquisition projects is not described in this document; rather, this information will be provided following closing of selected land acquisition projects, as described in Section 1.6.4 of this document. Land acquisition projects selected for Round 4 of the Restoration Program will be publicly announced after the realty transactions have been completed.

4.1 AQUATIC BIOLOGICAL RESOURCES AND HABITAT – TIER 1

The MA SubCouncil will provide up to $698,100 for three projects in the restoration priority category of Aquatic Biological Resources and Habitat. These projects will reconnect more than 3 miles of coldwater fisheries habitat, protect habitat in perpetuity, and restore approximately 1,380 acres associated with ecologically significant wetlands in the Housatonic River Watershed and secondarily enhance wildlife resources and habitat and recreational opportunities in the watershed.

4.1.1 Restoration Project 402: Churchill Brook Culvert Replacement

Applicant(s): Housatonic Valley Association, Inc. (HVA), in partnership with the City of Pittsfield, Berkshire Environmental Action Team (BEAT), and Foresight Land Services
Location: Pittsfield, MA
Requested NRD funding: $200,000
Contingency amount recommended by MA SubCouncil: $40,000
Recommended NRD allocation: $240,000

4.1.1.1 Summary of Proposed Action

Project Description
The abstract submitted with this project application describes the proposed project as follows:

> *The Housatonic Valley Association is seeking funding to replace the second of two barrier culverts on Churchill Brook in Pittsfield, MA; a designated high-quality cold-water fisheries resource. This replacement will complete the restoration of stream connectivity on Churchill Brook, which will reconnect three miles of unconstructive fish passage, and allow storm water to pass safety under Churchill Street.*
>
> *With Round 2 NRD funding, HVA assessed the continuity effectiveness of road-stream crossings in the upper Housatonic Watershed. These assessments were inputted in the UMass CAP Map program which identified these Churchill Brook culverts as high priorities for beneficial habitat restoration projects. Out of 1,162 structures assessed, these two culverts ranked in the top 25.*

The Round 2 grant project allowed us to hire Foresight Land Services to design open sided replacement culverts following the new state stream crossing standards for both culvert locations. We also acquired construction permits for these culvert projects.

Along with our partners, Ma. NRD Trustees, BEAT, TU, City of Pittsfield, we replaced the downstream culvert located on Hancock Road. We now want to replace the second culvert to open up the entire riverway.

Since we already have a replacement design for this Churchill Street culvert, costs are greatly reduced. Estimates for this culvert replacement costs are $753,608. We request $200,000 from NRD, and will acquire the remaining amount from other sources such as the City of Pittsfield, MEMA Hazard Mitigation Assistance Program, MA DER, National Fisheries and Wildlife Foundation, and Ma/RI Council Trout Unlimited.

Anticipated Timeframe

HVA anticipates that the Churchill Brook Culvert Replacement will occur over a period of 30 months. The anticipated project schedule identified in the project application is as follows:

- Confirm or Create Approved Culvert Design – Year 1
- Apply for DOT and CORPS Permit – Year 1
- Pre-Replacement Monitoring – Year 1
- Construction – Year 2
- Post-Replacement Monitoring – Year 2
- Overall Supervision of Project and Report Documentation – Years 1 and 2

Monitoring, Maintenance, and Evaluation

The culvert replacement project will be monitored following the methodology in the "Monitoring Plan for Churchill Brook Stream Culvert Replacement" that was previously created by HVA and BEAT for the Hancock Road project with funding from Round 2 of the Restoration Program and describes that pre- and post-construction monitoring will include photo documentation, pebble counts, benthic macroinvertebrate monitoring, and fisheries monitoring.

4.1.1.2 Project Evaluation

Environmental Impacts

Benefits to Resources: Replacement of undersized and perched culverts can enhance continuity of aquatic and riparian habitat, restore fluvial processes, and restore access to important coldwater habitat. Assessments conducted by the DFG indicate that the Churchill Brook watershed supports high-quality, coldwater habitat important to native brook trout (*Salvelinus fontinalis*). The existing culvert at the Churchill Road crossing is perched and is a barrier to upstream migration of aquatic species. Replacement of the

Churchill Brook culvert with a larger structure will build upon previous aquatic habitat connectivity efforts on Churchill Brook and reconnect more than 3 miles of coldwater habitat.

Adverse Impacts: Construction of culvert replacement projects can have short-term negative impacts to environmental parameters, including adverse impacts to surface water quality in the form of increased turbidity, erosion, and sediment release during the construction phase. However, through the design regulatory permitting processes, measures will be identified to minimize and mitigate construction-phase impacts (e.g. erosion and sedimentation controls). Culvert replacement activities may impact aquatic species during the construction period. Aquatic species will be monitored during the pre-construction phase and efforts will be made during construction to allow for animal migration away from temporary impact areas.

Permits will be required to address how environmental impacts will be avoided, minimized and mitigated. Necessary permits and regulatory approvals may include MEPA Review, Water Quality Certification, ACOE permits (e.g., Massachusetts General Permit), Massachusetts Wetlands Protection Act (WPA) Orders of Conditions, Massachusetts Historic Commission review, and Massachusetts Endangered Species Act (MESA) review.

Socioeconomic Impacts

Benefits to Community: River restoration and infrastructure maintenance are priorities for the community. Restored continuity may enhance native brook trout populations and enhance recreational fishing opportunities. Culvert replacement sites may provide educational opportunities to educators wishing to use the sites as components of their environmental curriculum and to municipalities exploring similar opportunities related to infrastructure maintenance, flood impact mitigation, and regulatory compliance. The project will be used to demonstrate the value of culvert replacement projects as a best management practice for increasing habitat connectivity and reducing flood risk and infrastructure maintenance costs. This project may provide a short-term commercial economic benefit through employment in relevant professions and trades.

Adverse Impacts: During construction, there may be short-term adverse impacts to local traffic, aesthetic quality, and recreational uses in the vicinity of the project area. These potential impacts will be limited in duration.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained

Aquatic and riparian wildlife and their habitats were injured or lost by the release of hazardous substances. This project will remove an identified stream barrier, enhancing aquatic habitat and connectivity in a designated high-quality, cold-water fisheries resource. Replacement of undersized and perched culverts with appropriately sized structures is recognized to provide an effective opportunity for restoration and enhancement of aquatic habitat and fluvial processes.

Letters of Support
A letter of support was received with the application from the City of Pittsfield and the Berkshire Regional Planning Commission.

Review Team
The GRT consensus evaluation score for this project application was the highest within this restoration priority category and above average across the four identified restoration priority categories. Reviewers noted that the project builds on a previous NRD-funded project implemented as a part of Round 2 of the Restoration Program and reflects a diversity of contributing project partners and resources.

4.1.1.3 MA SubCouncil Requested Adjustments to Application

Specific adjustments to the application were not identified by the MA SubCouncil. The MA SubCouncil reserves the right to negotiate final terms of the agreement with the Applicant.

4.1.1.4 Contingency funding recommended by MA SubCouncil

Based on experience with previous construction projects, including culvert replacement projects, the MA SubCouncil recommends allocating an additional $40,000 (20% of the requested NRD funding) to support the potential need to address unforeseen contingencies in association with construction of the project. This additional allocation would be reserved to support unforeseen contingencies associated with project construction if the MA SubCouncil determines contingency funding is necessary to achieve the goals of the project in accordance with the terms of the agreement with the Applicant.

Considering the above and the merits of the application, the MA SubCouncil approves funding this application with contingency funds, as described above.

4.1.2 Restoration Project 406: Land Acquisition Project #3

Applicant(s): Applicant Name withheld[14]
Location: Location withheld
Requested NRD funding: $110,100
Recommended NRD allocation: $110,100

4.1.2.1 Summary of Proposed Action

Project Description
The proposed project includes land acquisition, resulting in protection of a mix of high-quality aquatic, wetland, riparian and upland habitat and enhanced opportunities for public access and recreational activities. The proposed project addresses Restoration

[14] As described in this document, identifying information for land acquisition project applications is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land acquisition projects have closed.

Program goals of providing compensatory restoration through implementation of restoration actions that restore, replace, or acquire the equivalent of natural resources that have been injured or lost by the release of hazardous substances. Additional identifying information regarding this project is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land protection projects have closed.

Anticipated Timeframe
The Project applicant anticipates that NRD-funded project tasks, including closing on land acquisition, will likely be completed in 2019 or 2020.

Monitoring, Maintenance, and Evaluation
Following completion of land acquisition, the property will be managed and maintained by the Project applicant.

4.1.2.2 Project Evaluation

Environmental Impacts
Benefits to Resources: This project will protect in perpetuity the equivalent of natural resources that have been injured or lost by the release of hazardous substances.

Adverse Impacts: The MA SubCouncil has not identified adverse environmental impacts associated with the proposed project.

Socioeconomic Impacts
Benefits to Community: The proposed project protects habitat and will expand and enhance public access for recreational activities.

Adverse Impacts: The MA SubCouncil has not identified adverse socioeconomic impacts associated with the proposed project.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained
Aquatic and terrestrial habitats were injured or lost by the release of hazardous substances. This project will protect in perpetuity the equivalent of natural resources that have been injured or lost by the release of hazardous substances.

Letters of Support
A letter of support was received with the application.

Review Team
The GRT consensus evaluation score for this project application was the second highest score in this restoration priority category and above average across the four identified restoration priority categories. Reviewers noted that the proposed project protects in perpetuity natural resources and their services equivalent to natural resources that have been injured or lost by the release of hazardous substances.

4.1.2.3 MA SubCouncil Requested Adjustments to Application

Specific adjustments to the application were not identified by the MA SubCouncil. The MA SubCouncil reserves the right to negotiate final terms of the agreement with the Applicant.

Considering the above and the merits of the application, including due diligence materials submitted, the MA SubCouncil approves funding this application.

4.1.3 Restoration Project 405: Calcareous Fen Restoration

Applicant(s): Massachusetts Division of Fisheries and Wildlife (DFW), Natural Heritage and Endangered Species Program (NHESP)
Location: Egremont, Sheffield, Stockbridge, Great Barrington, and Richmond, MA
Requested NRD funding: $290,000
Contingency amount recommended by MA SubCouncil: $58,000
Recommended NRD allocation: $348,000

4.1.3.1 Summary of Proposed Action

Project Description
The abstract submitted with this project application describes the proposed project as follows:

> *This project will restore approximately 1,380-acres associated with five of the most ecologically significant calcareous wetlands in the Housatonic River Watershed: Jug End Fen, Schenob Brook, Agawam Lake, Kampoosa Bog and Fairfield Brook. These wetlands are comprised of calcareous fen natural communities supporting a suite of some of the region's most specialized and imperiled species. Field surveys carried out by The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (NHESP) with earlier support from the Natural Resource Damage Assessment and Restoration Program (NRDAR) have dramatically improved our understanding of the ecological importance of these wetlands, but also highlighted the need for further action to restore these wetlands and address threats. This proposal seeks funding to: (1) perform needed restoration actions such as the controlling invasive species, reintroducing natural disturbance agents such as prescribed fire, and repairing altered hydrology; (2) conduct hydrologic assessment to guide the repair of altered hydrology; and (3) support the long-term ability to maintain these natural communities once the initial restoration goals have been achieved. The proposed restoration actions will be completed within 4 years at a cost of $350,000, including $60,000 in committed cash and in- kind contributions from NHESP. This NHESP-led project will support the conservation efforts of the Kampoosa Stewardship Committee and The Nature Conservancy who have ownership and management interests at these sites.*

Anticipated Timeframe
NHESP anticipates that the Project will occur over a period of 4 years. The anticipated project schedule identified in the project application is as follows:

- Task 1: Site Analysis (Hydrology) – Years 1-3
- Task 2: Hydrologic Restoration – Years 3-4
- Task 3: Vegetation Control – Years 1-4
- Task 4: Prescribed Fire – Years 2-3
- Task 5: Restoration Monitoring and Rare Species Tracking – Years 2-4
- Task 6: Project Management – Years 1-4

Monitoring, Maintenance, and Evaluation

The proposed project includes provisions for ongoing monitoring and maintenance to be conducted by DFW staff, including ongoing monitoring of piezometers installed as a part of Task 1 to assess post-construction site response, monitoring and maintenance, as needed, of beaver flow devices installed as a part of Task 2, annual monitoring and retreatment, as needed, of vegetation controls implemented under Task 3, continued site management through prescribed burns at sites addressed in Task 4, and ongoing vegetation monitoring conducted every 3-5 years building on vegetation mapping addressed under Task 5.

4.1.3.2 Project Evaluation

Environmental Impacts

Benefits to Resources: Calcareous fens are regionally significant natural communities that include assemblages of highly specialized species and provide habitat for rare plants and animals. This project proposes to restore and enhance approximately 1,380 acres of calcareous wetland habitat that have been identified by the NHESP as top priorities for conservation, restoration, and management.

Adverse Impacts: Construction of dam removal projects may have short-term negative impacts to environmental parameters, including adverse impacts to surface water quality in the form of increased turbidity and sediment release during the construction phase. However, short-term construction phase impacts may be minimized through implementation of construction-phase best management practices and are generally anticipated to be outweighed by long-term environmental benefits associated with restoration of habitat, connectivity, and fluvial processes. As a part of the regulatory permitting process, minimization and mitigation of construction-phase impacts will be addressed.

Implementation of vegetation controls through herbicide application can result in adverse impacts potential associated with chemical application. Herbicides will be applied by licensed applicators following best management practices and overseen by NHESP staff.

Potential adverse impacts of prescribed burns may be associated with unintended affects to vegetation, wildlife, soil, water, and air quality. Potential adverse impacts of prescribed burns can be avoided and minimized through development of prescribed burn

plans appropriate to site context and project objectives. Authorized prescribed fire plans will be developed by a qualified prescribed fire planner; contractors preparing prescribed fire plans will meet National Wildlife Coordinating Group qualifications; local fire department permits will be obtained for prescribed burns; prescribed fire operations will be conducted within parameters set by DFW; and prescribed fire projects will be managed by an NHEPS prescribed fire coordinator. As stated in the application, DFW has extensive experience contracting and overseeing prescribed fire services.

Handling of bog turtles may result in unintended impacts to individuals. Potential for adverse impacts to bog turtles will be minimized through compliance with applicable regulations and oversight by NHESP's State Herpetologist.

Permits and regulatory reviews and approvals will be required to address how environmental impacts will be avoided, minimized and mitigated. Necessary regulatory compliance, permits, and approvals may include Endangered Species Act (ESA) and National Historic Preservation Act (NHPA) compliance, MEPA review, Water Quality Certification, ACOE permits (e.g., Massachusetts General Permit in compliance with the federal Clean Water Act), Massachusetts WPA Orders of Conditions, Massachusetts Historic Commission review, and MESA review.

Socioeconomic Impacts

Benefits to Community: Benefits to the community may be associated with restoration and preservation of iconic views and landscapes and enhancement of recreational activities including hunting, fishing, and naturalist opportunities.

Adverse Impacts: The MA SubCouncil has not identified adverse socioeconomic impacts associated with the proposed project.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained

Aquatic and riparian wildlife and their habitats were injured or lost by the release of hazardous substances into the Housatonic River. This project will restore and enhance a regionally significant natural community type, enhance aquatic and terrestrial habitat and connectivity, reestablish a natural disturbance regime through prescribed burns, provide information regarding rare plant and animal species, and establish long-term monitoring to evaluate restoration and inform adaptive management strategies.

Letters of Support

Letters of support were received with the application from the Massachusetts Division of Ecological Restoration, The Nature Conservancy, and the Kampoosa Stewardship Committee.

Review Team

The GRT consensus evaluation score for this project application was the third highest score in this restoration priority category and above average across the four identified restoration priority categories. Reviewers noted that the project addresses restoration and improved understanding of a regionally significant natural community type and the

habitats and species it supports, builds on past work funded through the Restoration Program, enhances aesthetic and recreational values, and establishes long-term monitoring to evaluate restoration and inform adaptive management strategies.

4.1.3.3 MA SubCouncil Requested Adjustments to Application

Specific adjustments to the application were not identified by the MA SubCouncil. The MA SubCouncil reserves the right to negotiate final terms of the agreement with the Applicant.

4.1.3.4 Contingency funding recommended by MA SubCouncil

Based on experience with the planning and implementation of large-scale, multi-phase restoration projects, the MA SubCouncil recommends allocating an additional $58,000 (20% of the requested NRD funding) to support the potential need to address unforeseen contingencies in association with planning and implementation of this project. This additional allocation would be reserved to support unforeseen contingencies associated with project planning and implementation if the MA SubCouncil determines contingency funding is necessary to achieve the goals of the project in accordance with the terms of the agreement with the Applicant.

Considering the above and the merits of the application, the MA SubCouncil approves funding this application with contingency funds, as described above.

4.2 WILDLIFE RESOURCES AND HABITAT – TIER 1

The MA SubCouncil will provide a total of $296,080 to two land acquisition projects in the restoration priority category of Wildlife Resources and Habitat. These projects will protect habitat in perpetuity and secondarily enhance aquatic biological resource and habitat, recreational uses, and environmental education and outreach opportunities in the watershed.

4.2.1 Restoration Project 404: Land Acquisition Project #2

Applicant(s): Applicant Name withheld[15]
Location: Location withheld
Requested NRD funding: $145,000
Recommended NRD allocation: $145,00

[15] As described in this document, identifying information for land acquisition project applications is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land acquisition projects have closed.

4.2.1.1 Summary of Proposed Action

Project Description

The proposed project includes land acquisition, resulting in protection of habitat and enhanced opportunities for recreational activities. The proposed project addresses Restoration Program goals of providing compensatory restoration through implementation of restoration actions that restore, replace, or acquire the equivalent of natural resources that have been injured or lost by the release of hazardous substances. Additional identifying information regarding this project is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land acquisition projects have closed.

Anticipated Timeframe

The project applicant anticipates that NRD-funded project tasks, including closing on land acquisition, could be completed in 2020.

Monitoring, Maintenance, and Evaluation

Following completion of land acquisition, the property will be managed and maintained by the Project applicant.

4.2.1.2 Project Evaluation

Environmental Impacts

Benefits to Resources: This project will protect in perpetuity the equivalent of natural resources that have been injured or lost by the release of hazardous substances.

Adverse Impacts: The MA SubCouncil has not identified adverse environmental impacts associated with the proposed project.

Socioeconomic Impacts

Benefits to Community: The proposed project protects habitat and will expand and enhance public access for recreational activities.

Adverse Impacts: The MA SubCouncil has not identified adverse socioeconomic impacts associated with the proposed project.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained

Aquatic and terrestrial habitats were injured or lost by release of hazardous substances. This project will protect in perpetuity the equivalent of natural resources that have been injured or lost by the release of hazardous substances.

Letters of Support

A letter of support was received with the application. No negative comments have been received.

Review Team
The GRT consensus evaluation score for this project application was the highest score within this restoration priority category and above average across the four identified restoration priority categories. Reviewers noted that the proposed project protects in perpetuity natural resources and their services equivalent to natural resources that have been injured or lost by the release of hazardous substances.

4.2.1.3 MA SubCouncil Requested Adjustments to Application

Specific adjustments to the application were not identified by the MA SubCouncil. The MA SubCouncil reserves the right to negotiate final terms of the agreement with the Applicant.

Considering the above and the merits of the application, including due diligence materials submitted, the MA SubCouncil approves funding this application.

4.2.2 Restoration Project 403: Land Acquisition Project #1

Applicant(s): Applicant Name withheld[16]
Location: Location withheld
Requested NRD funding: $151,080[17]
Recommended NRD allocation: $151,080[18]

4.2.2.1 Summary of Proposed Action

Project Description
The proposed project includes land acquisition, resulting in protection of habitat and enhanced opportunities for recreational activities and environmental education and outreach. The proposed project addresses Restoration Program goals of providing compensatory restoration through implementation of restoration actions that restore, replace, or acquire the equivalent of natural resources that have been injured or lost by the release of hazardous substances. Additional identifying information regarding this project is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land acquisition projects have closed.

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[16] As described in this document, identifying information for land acquisition project applications is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land acquisition projects have closed.
[17] As described in Sections 4.2.2.3 and 10, the amount NRD funding requested by the applicant was reduced from $171,080, as presented in the project application and the Draft Round 4 RP/SEA, based on a subsequent $20,000 reduction in the cost of the land acquisition agreement negotiated between the applicant and the landowner.
[18] The MA SubCouncil's recommended NRD allocation was reduced from $171,080, as presented in the Draft Round 4 RP/SEA, based on a $20,000 reduction in the cost of the land acquisition agreement negotiated between the applicant and the landowner documented after release of the Draft Round 4 RP/SEA (see Sections 4.2.2.3 and 10).

Anticipated Timeframe
The Project applicant anticipates that NRD-funded project tasks, including closing on land acquisition, will likely be completed in 2019 or 2020.

Monitoring, Maintenance, and Evaluation
Following completion of land acquisition, the property will be managed and maintained by the project applicant.

4.2.2.2 Project Evaluation

Environmental Impacts
Benefits to Resources: This project will protect in perpetuity the equivalent of natural resources that have been injured or lost by the release of hazardous substances.

Adverse Impacts: The MA SubCouncil has not identified adverse environmental impacts associated with the proposed project.

Socioeconomic Impacts
Benefits to Community: The proposed project protects habitat and will expand and enhance public access for recreational activities and environmental education and outreach.

Adverse Impacts: The MA SubCouncil has not identified adverse socioeconomic impacts associated with the proposed project.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained
Aquatic and terrestrial habitats were injured or lost by release of hazardous substances. This project will protect in perpetuity the equivalent of natural resources that have been injured or lost by the release of hazardous substances.

Letters of Support
A letter of support was received with the application.

Review Team
The GRT consensus evaluation score for this project application was the second highest score within this restoration priority category and above average across the four identified restoration priority categories. Reviewers noted that the proposed project protects in perpetuity natural resources and their services equivalent to natural resources that have been injured or lost by the release of hazardous substances.

4.2.2.3 MA SubCouncil Requested Adjustments to Application

The MA SubCouncil's recommended NRD allocation was reduced from $171,080, as presented in the Draft Round 4 RP/SEA, to $151,080. This reduction was based on a stated $20,000 reduction in the cost of the land acquisition agreement negotiated between the applicant and the landowner as documented in Section 10. Additional adjustments to

the application were not identified by the MA SubCouncil. The MA SubCouncil reserves the right to negotiate final terms of the agreement with the applicant.

Considering the above and the merits of the application, including due diligence materials submitted, the MA SubCouncil approves funding this application with the revisions described above.

4.3 ENVIRONMENTAL EDUCATION AND OUTREACH – TIER 1

The MA SubCouncil will provide a total of $442,938 to one project in the restoration priority category of Environmental Education and Outreach. This project will reach approximately 4,675 people across the Upper Housatonic River Watershed and secondarily enhance wildlife resource and habitat and recreational uses in the watershed.

4.3.1 Restoration Project 408: Housatonic River Watershed Education Programs

Applicant(s): Massachusetts Audubon Society, Inc. Berkshire Wildlife Sanctuaries (Mass Audubon) in partnership with the Housatonic Valley Association, Inc. (HVA)
Location: Multiple locations in the upper Housatonic River watershed, MA
Requested NRD funding: $441,338
Contingency amount recommended by MA SubCouncil: $1,600
Recommended NRD allocation: $442,938

4.3.1.1 Summary of Proposed Action

Project Description
The abstract submitted with the project application describes the proposed project as follows:

> *Over 3 years beginning in August 2019, Mass Audubon will partner with Housatonic Valley Association to create and deliver new Housatonic River Watershed Education Programs, building on Mass Audubon's previously NRD-funded "Housatonic Environmental Literacy Program (HELP) for the River". The new programs will include river and watershed education, river-based recreation, and riparian habitat stewardship opportunities for schools and communities of the Upper Housatonic River Valley. The ultimate aim of this project is for residents of the Upper Housatonic River Valley to be informed citizens with the knowledge and motivation to restore and protect the health of the Housatonic River and its watershed for current and future generations. This project will reach approximately 4,675 people across the entire Upper Housatonic River Watershed, including students in four grades and the general public (families, adults, residents, and visitors).*
>
> *The project tasks are 1) Project Management and Coordination; 2) Environmental Education Programs for Elementary and Middle Schools; 3) Community Education and Stewardship Programs; 4) Nature Education Camp Feasibility Study and Pilot at Canoe Meadows Wildlife Sanctuary; and 5) Monitoring and Evaluation. The project*

design strategically integrates school and community approaches with place-based learning to engage participants of all ages in a way that teaches, inspires, and builds a new generation of watershed stewards. A professionally guided program evaluation will result in quantified metrics of the effect of the programs on participants' knowledge, attitudes, and behavioral intentions. Mass Audubon requests $441,338 from the NRD Fund and will provide a match of $188,239.

Anticipated Timeframe
Mass Audubon anticipates that the Project will occur over a period of 3 years. The anticipated task schedule as identified in the project application is as follows:

- Task 1: Project Management and Coordination – Years 1 – 3
- Task 2: Education Programs for Elementary and Middle Schools – Years 1-3
- Task 3: Community Education and Stewardship Programs – Year 1-3
- Task 4: Canoe Meadows Nature Camp Feasibility and Pilot Program – Year 1-3
- Task 5: Monitoring and Evaluation – Years 1-3

Monitoring, Maintenance, and Evaluation
The proposed project includes a dedicated task for "Monitoring and Evaluation" under which Mass Audubon's Education Grants and Professional Development Manager, in consult with Daphne Minner, Ph.D., Principal at Daphne Minner Consulting, will conduct the project's evaluation. The process will include both formative and summative elements. The formative feedback primarily will be provided during monthly project phone conversations with key project personnel to monitor progress, brainstorm about programmatic issues that arise, support productive collaboration among partners, and provide guidance on recording project outputs. At the end of each project year, an evaluation report will be prepared summarizing the project's development and implemented activities as well as the evaluation outcomes assessed that year. These reports will highlight issues from the evaluation data and provide guidance to address issues in subsequent project years. The objectives of this approach include supporting the ability to identify and correct problems that may arise during project implementation. Detailed information on the monitoring and evaluation components of the proposed project can be found in the project application.

4.3.1.2 Project Evaluation

Environmental Impacts
Benefits to Resources: As described in the project application, the objective of this project is for residents of the Upper Housatonic River Valley to be informed citizens who have the knowledge and motivation to restore and protect the health of the Housatonic River and its watershed for current and future generations. This proposed project also includes a habitat stewardship component that includes native plant restoration and invasive plant control efforts in riparian zones along the Housatonic River and adjacent upland areas.

Adverse Impacts: The MA SubCouncil has not identified adverse environmental impacts associated with the proposed project.

Socioeconomic Impacts
Benefits to Community: As described in the project application, the Housatonic River plays a central role in the historic, ecological, economic, cultural environment of the Berkshire region, and the degradation of the Housatonic River negatively impacted the community's connections to it. A primary object of the proposed project is to develop and enhance long-term, responsible river and watershed stewardship, thereby helping to build a foundation for improved social and economic uses of the river. It is anticipated that the Housatonic River Watershed Education Program would have a directly beneficial effect on multiple Environmental Justice populations in the Housatonic River watershed by increasing experiential educational opportunities for school-aged children.

Adverse Impacts: The MA SubCouncil has not identified adverse environmental impacts associated with the proposed project.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained
Educational and recreational uses of natural resources were injured or lost by release of hazardous substances. The proposed activities increase river-related environmental education and seek to improve environmental stewardship leading to a healthier Housatonic River watershed.

Letters of Support
Letters of support were received with the application from the Stearns Elementary School, Morris Elementary School, Monument Valley Regional Middle School, and Lee Elementary School.

Review Team
The GRT consensus evaluation score for this project application was the highest scoring of all applications across the four identified restoration priority categories. Reviewers noted that the project builds upon the Housatonic Environmental Literacy program, a previous NRD-funded project implemented by Mass Audubon as a part of Round 1 of the Restoration Program, and that this project appears to have the potential to provide substantial socioeconomic benefit. The assigned score was also positively influenced by the technical capacity of the applicant and project team.

4.3.1.3 MA SubCouncil Requested Adjustments to Application

Specific adjustments to the application were not identified by the MA SubCouncil. The MA SubCouncil reserves the right to negotiate final terms of the agreement with the Applicant.

4.3.1.4 Contingency funding recommended by MA SubCouncil

The MA SubCouncil recommends allocating an additional $1,600 to provide for the acquisition of adaptive paddling equipment to support accessibility for the boat-based components of the project. This additional allocation would be reserved to support the acquisition of adaptive paddling equipment if accessibility measures are not otherwise provided for by the Applicant and the MA SubCouncil determines contingency funding is necessary to achieve the goals of the project in accordance with the terms of the agreement with the Applicant.

Considering the above and the merits of the application, the MA SubCouncil approves funding this application with the contingency funds described above.

4.4 RECREATIONAL USES OF NATURAL RESOURCES – TIER 1

No Round 4 projects applications were submitted that focus specifically on this restoration priority category. However, the MA SubCouncil notes that several identified Tier 1 projects in the Preferred Alternative include secondary features that address recreational uses of natural resources, including Restoration Projects 403, 404, 405, 406 and 408.

4.5 AQUATIC BIOLOGICAL RESOURCES AND HABITAT – TIER 2

As described in Section 1.6.4.3, potential funding for projects in Tier 2 will be decided by the MA SubCouncil based, in part, on the outcomes of Tier 1 projects and MA SubCouncil judgment regarding what actions may compensate for the natural resource injuries. Should adequate NRD funds be available once Tier 1 projects are implemented, the MA SubCouncil may use remaining funds to support Tier 2 projects. Tier 2 projects are not guaranteed funding, and the MA SubCouncil may choose to wait to fund Tier 2 projects until they have greater certainty regarding the costs of Tier 1 projects.

The MA SubCouncil identified one Tier 2 project in this restoration priority category.

4.5.1 Restoration Project 410: Planning for Flood Resilient and Fish Friendly Road-Stream Crossings in the Berkshire Hills

Applicant(s): Housatonic Valley Association, Inc. (HVA), in partnership with the Towns of Alford, Egremont, West Stockbridge, Great Barrington, and Richmond, MA.
Location: Alford, Egremont, Stockbridge, West Stockbridge, Great Barrington, and Richmond, MA
Requested NRD funding: $125,675
Recommended NRD allocation: To Be Determined [See above regarding funding of Tier 2 projects]

4.5.1.1 Summary of Proposed Action

Project Description

The abstract submitted with the project application describes the proposed project as follows:

> *The Berkshire region of Massachusetts (MA) is home to high-quality headwater streams. Road-stream crossings that are undersized or designed in a way that does not account for stream geomorphology may act as barriers to the movement of aquatic species and be more likely to fail in a storm event. NRD Round 4 funds will be used to develop Preliminary Designs for culvert replacement projects that demonstrate Stream Simulation Design and meet the MA Stream Crossing Design Standards in five Berkshire towns. Demonstration projects will be identified through a comprehensive, town-scale road- stream crossing management planning process (to be completed with funding from the 2018 Round of the National Fish and Wildlife Foundation's New England Forests and Rivers Fund). The Management Planning process is designed to: 1) Identify highest priority replacement projects based on conservation value, flood risk and maintenance need; 2) Show communities that the same design practices that restore stream habitat continuity also reduce flood risk and maintenance costs; 3) Create a new tool for securing financing for replacement projects, and 4) Build local capacity to complete replacement projects that meet the MA Stream Crossing Design Standards. Given the large number of barrier culverts in the Berkshires, this kind of local capacity-building is essential to comprehensively restoring aquatic habitat continuity across the region. Demonstration Preliminary Designs, including cost estimates and implementation strategies, will be included in each town's final Management Plan, and represent an essential step between assessment/prioritization and implementation. This work will build on HVA's successful road-stream crossing assessment and replacement planning program, which was developed with significant support from NRD Round 2 funding.*

As described in the application, Round 4 NRD funds are requested for two components of the overall project; specifically, "Objective 4 - Develop Preliminary Design and Implementation Strategy for replacement projects at priority crossings" and "Objective 6 – Project Management". Other components of the project include "Objective 1 – Update Stream Habitat Continuity Assessments", "Objective 2 – Model Risk of Failure at all non-bridge structures in target towns", "Objective 3 – Develop Road/Stream Crossing Inventory documents and set priorities", "Objective 5 – Assemble Road-Stream Crossing Management Plan documents for each target town and facilitate municipal adoption". Work proposed under Objectives 1, 2, 3, and 5 is funded through a grant from the National Fish and Wildlife Foundation (NFWF) New England Forests and Rivers Fund.

Anticipated Timeframe

HVA anticipates that it would take approximately four years to implement the entire project, which includes the following objectives:

Objective 1: Update Stream Habitat Continuity Assessments in five Berkshire towns.

Objective 2: Model Risk of Failure at all non-bridge structures in target towns.

Objective 3: Collect information gathered under Objectives 1 and 2 as Road-Stream Crossing Inventory documents and use these to work with Town leaders and partners to identify priority replacement projects.

Objective 4: Develop Preliminary Design Plans and Implementation Strategies for replacement projects at priority crossings.

Objective 5: Assemble Road-Stream Crossing Management Plan documents for each target town and facilitate municipal adoption.

Monitoring, Maintenance, and Evaluation
"Objective 5" (funded through a NFWF New England Forests and Rivers Fund grant) includes development of a management plan for each target town.

The application also notes that HVA is committed to working with each town to help acquire funding to support future implementation and post-construction phases of the project, including post-construction evaluation, monitoring, and outreach; however, these phases are not a component of the current phase of this project.

Metrics proposed for quantification of restoration benefits associated with Objective 4 include the number of Preliminary Designs/Implementation Strategies developed for priority culvert replacement projects. The application notes that, following identification of priority culvert replacement sites, the specific restoration benefits of each replacement project can be predicted through the number of stream miles that will be reconnected, reduction in flood risk, and reduction in infrastructure maintenance costs; however, these benefits would be dependent on implementation of the culvert replacement design and strategies and this is not a component of the current phase of this proposed project.

4.5.1.2 Project Evaluation

Environmental Impacts
Benefits to Resources: Objectives 4 (development of preliminary design plans and implementation strategies) and 6 (project management) do not provide direct environmental benefits. However, this project proposes planning, preliminary design, and capacity building efforts to support future efforts to replace culverts that act as barriers in high-quality streams. Replacement of such structures can result in enhancements to aquatic and riparian habitat and connectivity and restoration of fluvial processes.

Adverse Impacts: The MA SubCouncil has not identified potential adverse environmental impacts associated with the current phase of the project, which includes planning, preliminary design, and outreach.

Socioeconomic Impacts

Benefits to Community: Objectives 4 (development of preliminary design plans and implementation strategies) and 6 (project management) do not provide direct benefits to the community. In the context of the larger project, and potential future phases of the project, anticipated benefits include outreach and education, capacity building and adoption of best management practices related to stream crossing infrastructure resulting in reduced maintenance costs, increased flood resiliency, and habitat-related benefits that may enhance aesthetic and recreational interests.

Adverse Impacts: The MA SubCouncil has not identified adverse socioeconomic impacts associated with the proposed project.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained

Aquatic and riparian wildlife and their habitats were injured or lost by release of hazardous substances. Anticipated benefits of the proposed project and anticipated future phases include outreach, education, and capacity building supporting adoption of best management practices related to stream crossing infrastructure which may result in numerous benefits to the quality and accessibility of aquatic and riparian habitats and the species they support.

Letters of Support

Letters of support were received with the application from the Massachusetts Division of Ecological Restoration, The Nature Conservancy, and the Kampoosa Stewardship Committee. No negative comments have been received.

Review Team

The GRT consensus evaluation score for this project application was below average within this restoration priority category and just slightly above average across the four identified restoration priority categories. Reviewers noted that the proposed project has the potential to result in useful demonstration projects and capacity building but that portions of the application are difficult to read and evaluate and the application lacks evidence that the project would result in implementation of the developed replacement stream crossing designs.

4.5.1.3 MA SubCouncil Requested Adjustments to Application

Specific adjustments to the application were not identified by the MA SubCouncil. The MA SubCouncil reserves the right to negotiate final terms of the agreement with the applicant.

Considering the above and the merits of the application, the MA SubCouncil approves funding this application (in part or in full) as a Tier 2 project if adequate NRD funds exist following implementation of Tier 1 projects.

4.6 WILDLIFE RESOURCES AND HABITAT – TIER 2

The MA SubCouncil has not selected any Tier 2 projects in this restoration priority category.

4.7 ENVIRONMENTAL EDUCATION AND OUTREACH – TIER 2

The MA SubCouncil has not selected any Tier projects in this restoration priority category.

4.8 RECREATIONAL USES OF NATURAL RESOURCES – TIER 2

The MA SubCouncil has not selected any Tier 2 projects in this restoration priority category.

4.9 SUMMARY OF ENVIRONMENTAL AND SOCIOECONOMIC IMPACTS OF THE PREFERRED ALTERNATIVE

Table 9 presents a summary of anticipated, potential impacts for the proposed projects included in the Preferred Alternative as determined by the MA SubCouncil.

Table 9: Project Impacts – Preferred Alternative (Tiers 1 & 2)

Impact Category	*Impact*	*Application Number*						
		402	**403**	**404**	**405**	**406**	**408**	**410**
Environmental	Air quality	*MA*	*NE*	*NE*	*MA*	*NE*	*NE*	*NE*
	Instream flow	*B*	*B*	*NE*	*B*	*NE*	*NE*	*B*
	Surface water quality	*B*	*B*	*B*	*B*	*B*	*NE*	*B*
	Sediment quality	*B*	*NE*	*NE*	*B*	*NE*	*NE*	*B*
	Soil quality	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Groundwater quality	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Wetlands quality and services	*B*	*B*	*B*	*B*	*B*	*NE*	*B*
	Diversity and abundance of aquatic species	*B*	*B*	*B*	*B*	*B*	*NE*	*B*
	Diversity and abundance of terrestrial wildlife species	*B*	*NE*	*B*	*B*	*B*	*B*	*B*
	Diversity of plant communities	*B*	*B*	*B*	*B*	*B*	*B*	*B*
	Other: Diversity of rare species	*NE, B*	*NE, B*	*NE, B*	*B*	*NE, B*	*NE*	*B*
Social	Impacts on minority or low-income populations	*NE*	*NE*	*NE*	*NE*	*NE*	*B*	*NE*
	Impacts on local sense of community and well being	*B*	*NE*	*NE*	*B*	*NE*	*B*	*B*
	Impacts on aesthetics	*B*	*NE*	*NE*	*B*	*NE*	*NE*	*B*
	Impacts on public health or safety	*B*	*NE*	*NE*	*B*	*NE*	*NE*	*B*
	Impacts on recreational activity	*B*	*NE, B*	*B*	*NE*	*B*	*B*	*B*
	Impacts to Native American Trust Resources	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Impacts on non-Tribal cultural sites	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Impacts on education	*NE*	*B*	*B*	*NE*	*NE*	*B*	*B*
	Impacts on local partnerships and collaborative efforts	*B*	*B*	*NE*	*B*	*NE*	*B*	*B*
	Impacts on availability and quality of drinking water	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Impact on subsistence activity	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Nuisance impacts	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
Economic	Short-term commercial economic impact of restoration action	*B*	*NE*	*NE*	*B*	*NE*	*NE*	*B*
	Impacts on property values	*B*	*NE, B*	*NE, B*	*NE*	*NE, B*	*NE*	*NE*
	Impacts on recreational expenditures and related business	*NE*	*NE, B*	*B*	*NE*	*B*	*NE*	*NE*
	Impacts on existing resource-based industries	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Impacts on commercial water users	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Impacts on river-based commercial navigation	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*
	Impact on wastewater dischargers	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*	*NE*

Intensity Levels: "*B*" – Beneficial Impact; "*NE*" – No Effect; "*MA*" – Minimal Adverse Impact; "*SA*" – Significant Adverse Impact; "-" – No Response

4.10 SUMMARY OF CUMULATIVE ENVIRONMENTAL AND SOCIOECONOMIC IMPACTS OF THE PREFERRED ALTERNATIVE

The MA SubCouncil's Preferred Alternative includes a suite of projects to restore natural resources and/or natural resource services that were injured or lost as a result of the release of PCBs or other hazardous substances into the Housatonic River. To assess the cumulative impacts of these alternatives, this section focuses on how restoration actions would combine with other factors to influence the environmental quality of the Housatonic River watershed. In the regulations implementing NEPA, the Council on Environmental Quality defines cumulative impacts as the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions" 40 CFR § 1508.7.

The cumulative environmental impacts are anticipated to be largely beneficial because the MA SubCouncil proposes to implement compensatory restoration projects that would foster recovery, restoration and protection of the equivalent of the injured natural resources and their services. Habitat restoration, land conservation, environmental education, and other efforts included in the Preferred Alternative would help counteract other, pre-existing factors that adversely impact water quality and wildlife habitat.

The Preferred Alternative selected as part of this Final RP/SEA will complement and enhance pre-existing restoration initiatives that are ongoing in the Housatonic River watershed. The discovery of PCB contamination as a result of GE activities has greatly heightened environmental awareness in the watershed. A variety of research and conservation efforts are complete or underway in the region and, if adequately funded through other sources, could continue to proceed independently of the proposed projects selected for the Preferred Alternative in this Final RP/SEA.

In addition, restoration efforts other than those described in this Final RP/SEA will continue to occur in the context of existing state and federal regulatory and conservation programs as described in the examples below.

- Wetland impacts are regulated through federal programs administered by the ACOE (Sections 10 and 404 of the CWA). In accordance with "no net loss" policies, activities causing impacts to wetland may require mitigation that includes restoration activities.
- A variety of federal programs provide for the conservation of natural resources; for instance, the Department of Agriculture's Natural Resource Conservation Service (NRCS) Wetland Reserve Program pays farmers to retire marginally productive cropland for the benefit of wildlife habitat. Other federal habitat conservation programs include the NRCS Conservation Reserve Program, the NRCS Wildlife Habitat Incentive Program, and the USFWS Partners for Fish and Wildlife Program.

- Massachusetts implements wetland restoration and conservation programs with funds obtained from Section 104(b)(3) Wetlands Program Development Grants.
- USEPA administers grants under Section 319 of the CWA to fund state non-point source control efforts. The grants cover technical assistance, financial assistance, education, training, technology transfer, demonstration projects, and monitoring to assess success of specific projects.
- Massachusetts implements various programs with funds obtained from Section 106 CWA Water Pollution Control Program Grants.
- Massachusetts implements programs and administers grants supporting assessment and replacement of undersized and perched road-stream crossings.
- Numerous non-profit organizations (e.g., HVA, BNRC, Mass Audubon) acquire and manage land in the Housatonic watershed for recreation and open space conservation.

These efforts in conjunction with the Preferred Alternative will provide additive environmental benefits to the Housatonic River watershed.

The Preferred Alternative will also help to minimize negative environmental and socioeconomic forces discussed in Section 2 (Affected Environment). Notably, restoration will likely enhance residents' and visitors' enjoyment of the natural environment, through general aesthetic improvement and creation of recreational opportunities. Commercial activity associated with increased recreation may help to partially offset job losses in traditional sectors such as manufacturing and farming. Affected industries may include hotels, restaurants, guide services, and retail. Additionally, the public's understanding of health risks associated with environmental damage can be enhanced by environmental education and outreach and by public knowledge of and participation in restoration efforts. The MA SubCouncil will consider and strive to minimize adverse cumulative impacts from projects implemented under the Restoration Program.

5 NON-SELECTED PROJECT APPLICATIONS

Three applications were not selected for funding based on the results of the Evaluation Criteria scoring and other factors, including the range of potential benefits associated with these proposed projects relative to those included in the Preferred Alternative and constraints associated with availability of Round 4 NRD funds.

5.1 AQUATIC BIOLOGICAL RESOURCES AND HABITAT

5.1.1 Restoration Project 407: Alford Springs Culvert Improvement Project

Applicant(s): Berkshire Natural Resources Council (BNRC)
Location: Alford, MA
Requested NRD funding: $196,300[19]

5.1.1.1 Summary of Proposed Action

The abstract submitted with the project application describes the proposed project as follows:

> *Berkshire Natural Resources Council seeks to replace and upgrade three culverts at its Alford Springs reserve to Massachusetts Stream Crossing Standards. The selected culverts are a high priority for replacement due to the importance of the tributaries they cross, their current physical conditions, and by the potential to lose maintenance and recreation access to the property. This large conserved parcel (+/-898 acres) is part of a block of over 13,000 acres of protected land, and is part of the Green River sub-watershed, a major tributary of the Housatonic River.*

5.1.1.2 Project Evaluation

Environmental and Socioeconomic Impacts
Environmental benefits associated with the project were anticipated to include enhancements to water quality and aquatic habitat (e.g., through reducing erosion and sedimentation) and habitat connectivity (e.g., by replacing structures acting as barriers). Socioeconomic benefits were anticipated to include benefits related to maintaining / enhancing trail access for maintenance and recreational purposes. Adverse environmental or socioeconomic impacts associated with the construction phase of culvert replacement (e.g., surface water quality and aesthetics) were anticipated to be minimal and short-term. Additional details on environmental and socioeconomic impacts can be found in the project application.

[19] This is the amount stated in the Project Budget Summary Form in the application but may be in error. Summing the Proposed Costs for the individual tasks suggests that the total requested NRD Funds may be $196,600.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained
As proposed, the project would enhance stream continuity and may benefit injured natural resources and services through improvements related to water quality, habitat, and access for recreation and habitat management. However, the apparent cost-benefit ratio of this project appears low based on the limited site-specific information provided, the projected project costs, and the relatively small upstream watershed.

Letters of Support
No letters of support were received with the project application.

Review Team
The GRT score for this project application was the lowest within its restoration priority category and below average across the four identified restoration priority categories. The assigned score was influenced by factors including lack of information in the application addressing the specific ecological benefits of the proposed project (i.e., the anticipated benefits of these specific culvert replacements vs culvert replacement in general) and limited detail regarding assumptions and justification for the project budget, including the capacity to address potential contingency actions.

Considering the above, the details of the application, and the limited NRD funding available, the MA SubCouncil will not allocate NRD funds for this project.

5.2 WILDLIFE RESOURCES AND HABITAT

5.2.1 Restoration Project 401: Japanese Knotweed Control Along the Housatonic River

Applicant(s): Native Habitat Restoration LLC
Location: Great Barrington and Sheffield, MA
Requested NRD funding: $203,978

5.2.1.1 Summary of Proposed Action

The abstract submitted with the project application describes the proposed project as follows:

> *The goal of the Japanese Knotweed Control along the Housatonic River project is to improve the condition and integrity of critical riparian buffers of the Housatonic River as well as floodplain· forests, early successional habitats and lowland forests. This project spans both sides of 2.9 miles of the Housatonic River with 10 landowners participating including the National Park Service, Commonwealth of Massachusetts, Great Barrington Land Conservancy, Sheffield Land Trust, Town of Great Barrington, the Sheffield Chapel and private landowners. Using proven effective methods of Japanese Knotweed (*Polygonum cuspidatum*) treatment, we will reduce Japanese Knotweed cover to less than 5% by 2023.*

This project will improve the health, structure and long-term integrity of these important habitats which in turn support the rare and endangered plant and animal species as well as many more common ones. Enhancing the wildlife habitat and aesthetics of these highly visible and visited areas will benefit the recreational activities by land and water.

This three-year $212,278 project seeks $203,978 in funding support from the Natural Resources Damages Fund.

5.2.1.2 Project Evaluation

Environmental and Socioeconomic Impacts

Identified environmental benefits associated with the proposed project include promoting native species and habitat recovery in riparian buffer and floodplain forests along the Housatonic River through the reduction of Japanese knotweed cover. Identified socioeconomic benefits include benefits to environmental education and outreach associated with landowner coordination as well as benefits to the aesthetic and recreational experience. Adverse environmental or socioeconomic impacts may be associated with the herbicide application, though these may be mitigated through appropriate application techniques by a qualified applicator and compliance with applicable regulations.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained

As proposed, the project may benefit injured natural resources and services through enhancements to riparian habitat. However, the long-term cost-benefit ratio of this project may be low based on factors including the anticipated project cost provided by the applicant and uncertainty regarding the long-term potential for maintaining the anticipated initial benefits achieved through this proposed project.

Letters of Support

Letters of support were received with the project application from the Massachusetts Division of Fisheries and Wildlife, National Grid, Great Barrington Land Conservancy, Sheffield Chapel, Sheffield Land Trust, Appalachian Trail Conservancy, and Janet Elsbach.

Review Team

The GRT score for this project application was the lowest within its restoration priority category (tied with Restoration Project #409) and below average across the four identified restoration priority categories. While reviewers appreciated the location and spatial extents of the proposed project, concerns regarding the long-term sustainability of the proposed project were identified. Specifically, it was identified that the proposed project could require additional funding for long-term maintenance of initial benefits. Reviewers noted that specific potential contingency actions and adaptive management measures, as may be needed if treatments do not achieve or maintain target values, were not addressed in the project application.

Considering the above, the details of the application, and the limited NRD funding available, and considering public comments received during the 30-day public comment period (see Section 10), the MA SubCouncil will not allocate NRD funds for this project.

5.2.2 Restoration Project 409: Land Acquisition Project #4

Applicant(s): Applicant Name withheld[20]
Location: Location withheld
Requested NRD funding: $286,000

5.2.2.1 Summary of Proposed Action

The proposed project includes land acquisition, resulting in protection of habitat and enhanced opportunities for recreational activities and environmental education and outreach. The proposed project addresses Restoration Program goals of providing compensatory restoration through implementation of restoration actions that restore, replace, or acquire the equivalent of natural resources that have been injured or lost by the release of hazardous substances. Additional identifying information regarding this project application is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land acquisition projects have closed.

5.2.2.2 Project Evaluation

Environmental and Socioeconomic Impacts
This project would protect in perpetuity natural resources that have been injured or lost by the release of hazardous substances. The proposed project would protect habitat and support future opportunities for environmental education and outreach. The MA SubCouncil has not identified adverse environmental or socioeconomic impacts associated with the proposed project.

Nexus to Natural Resource/Service Injury and Restoration Benefits Gained
Aquatic and terrestrial habitats were injured or lost by the release of hazardous substances. This project will protect habitat in perpetuity; however, there may be a limited nexus between the habitat protected by the proposed project and compensatory restoration of the injured resources.

Letters of Support
Letters of support were received with the application.

[20] As described in this document, identifying information for land acquisition project applications is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land acquisition projects have closed.

Review Team
The GRT score for this project application was the lowest within its restoration priority category (tied with Restoration Project #401) and below average across the four identified restoration priority categories. The assigned score was influenced by factors including a low relationship of expected costs to expected benefits. The reviewers noted that the proposed project includes a relatively high per acre value coupled with a limited apparent nexus between the proposed project and compensatory restoration of the injured resources.

Considering the above, the details of the application, and the available NRD funding, the MA SubCouncil will not allocate Round 4 NRD funds for this project.

5.3 RECREATIONAL USES OF NATURAL RESOURCES

The MA SubCouncil has not identified any Non-Selected Project Alternatives in this restoration priority category.

5.4 ENVIRONMENTAL EDUCATION AND OUTREACH

The MA SubCouncil has not identified any Non-Selected Project Alternatives in this restoration priority category.

6 COMPLIANCE WITH OTHER AUTHORITIES

As discussed in Section 1, the two major federal laws guiding the restoration of the GE/Housatonic River Site are CERCLA and NEPA. CERCLA provides the basic framework for natural resource damage assessment and restoration, while NEPA sets forth a specific process of impact analysis and public review. The major state law governing the MA SubCouncil's NRD activities is M.G.L. Ch. 21E, and for evaluating environmental impacts is MEPA. However, in developing and implementing the Round 4 RP/SEA for the GE/Housatonic River Site, the MA SubCouncil and project applicants must comply with other applicable laws, regulations, and policies at the federal, state, and local levels. Sections 6.1 and 6.2 below list these potentially relevant laws and policies and discusses their applicability with respect to the restoration of the GE/Housatonic River Site.

In addition to laws and regulations, the MA SubCouncil must consider relevant environmental or economic programs or plans in developing and implementing the Round 4 RP/SEA. The most important of these is the clean-up of the Housatonic River environment, but other efforts are ongoing or planned in or near the affected environment. By coordinating restoration with relevant programs and plans, the MA SubCouncil intends that the restoration not duplicate other efforts but enhance the overall effort to improve the environment of the Housatonic River.

The following list of laws, policies, and directives may not be exhaustive for each project in the Preferred Alternative. The MA SubCouncil has a responsibility to require that activities using NRD funds comply with all relevant laws, policies, and directives. Project applicants receiving NRD funding will be responsible for obtaining all relevant permits and formally complying with any and all laws, policies, ordinances, or other local, Commonwealth, and federal requirements applicable to the expenditure of the NRD funding. While Round 4 NRD funding will be disbursed by the Commonwealth, thereby automatically mandating compliance with certain Commonwealth requirements, applicants receiving NRD funding may also be responsible for compliance with certain federal requirements applicable to the expenditure of the NRD funding.

6.1 LAWS

6.1.1 Federal Laws

Clean Water Act (CWA) (a.k.a., Federal Water Pollution Control Act), 33 U.S.C. § 1251 et seq.

The CWA is the principle law governing pollution control and water quality of the Nation's waterways. Section 404 of the law authorizes a permit program for the disposal of dredged or fill material in the Nation's waters, administered by the ACOE. It is anticipated that some of the projects in the Round 4 Preferred Alternative will require such permits. In such cases, the project proponent must obtain the appropriate permits before implementing the regulated activities. In granting permits to applicants for dredge

and fill, applicants may be required to undertake mitigation measures such as habitat restoration to compensate for losses resulting from the project.

Under Section 401 of the CWA, projects that entail discharge or fill to wetlands or waters within federal jurisdiction must obtain certification of compliance with water quality standards. The MassDEP implements the 401 Water Quality Certification Program through 314 CMR § 9.00. In general, projects with minor wetlands impacts may not be required to obtain individual 401 Certification, while projects with potentially larger or cumulative impacts to critical areas may require certification.

Endangered Species Act (ESA), 16 U.S.C. § 1531 et seq.

The ESA establishes a policy that all federal departments and agencies seek to conserve endangered and threatened species and their habitats and encourages such agencies to utilize their authorities to further these purposes. Under the Act, the Department of Commerce and/or DOI publish lists of endangered and threatened species. Section 7 of the ESA requires that federal agencies and departments consult with the Department of Commerce and/or DOI to minimize the effects of federal actions on endangered and threatened species.

The bog turtle (*Clemmys muhlenbergii*) and northern long-eared bat (*Myotis septentrionalis*) are listed under the ESA as threatened species that exist in the Housatonic River watershed in Massachusetts.

The MA SubCouncil anticipates that the projects in the Round 4 Preferred Alternative will not have adverse effects upon threatened or endangered species; however, project applicants will be required to comply with the ESA if/as applicable and may be required to consult with the USFWS's Endangered Species Program before implementing restoration projects.

Fish and Wildlife Coordination Act (FWCA), 16 U.S.C. § 661 et seq.

The FWCA requires that federal agencies consult with the USFWS, the National Marine Fisheries Service, and state wildlife agencies for activities that affect, control, or modify waters of any stream or bodies of water, in order to minimize the adverse impacts of such actions on fish and wildlife resources and habitat. The federal agencies required to consult include permitting agencies such as the ACOE. This consultation is generally incorporated into the process of complying with Section 404 (see CWA, above), NEPA or other federal permit, license, or review requirements.

Rivers and Harbors Act, 33 U.S.C. § 401 et seq.

The Rivers and Harbors Act regulates development and use of the Nation's navigable waterways. Section 10 of the Act prohibits unauthorized obstruction or alteration of navigable waters and invests the ACOE with authority to regulate discharges of fill and other materials into such waters. Actions that require Section 404 permits (see CWA, above) are likely to also require permits under Section 10 of the Rivers and Harbors Act, but a single permit generally serves for both; therefore, the MA SubCouncil anticipates project compliance with the Rivers and Harbors Act through the same mechanisms.

American Indian Religious Freedom Act of 1978 (42 U.S.C. 1996)
Under this statute, information on American Indian, Eskimo, Aleut, and Native Hawaiian religious and heritage issues must receive good-faith consideration during planning and decision making.

Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3001-3013)
This law protects Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony on federally owned or controlled lands, Indian tribal lands, and Native Hawaiian land. The MA SubCouncil anticipates that the projects in the Round 4 Preferred Alternative will not occur on lands that are owned or will be owned by the federal government or federally-recognized Indian tribes. Where applicable, the MA SubCouncil requires that the proper precautions and actions are taken with respect to these cultural resources.

Antiquities Act (16 U.S.C. 431-433) and Archaeological Resources Protection Act (ARPA), as amended (16 U.S.C. 470aa-470 mm)
The Antiquities Act was enacted in 1906 to protect historic and prehistoric ruins, monuments, and objects of antiquity on federally owned or controlled lands. The ARPA protects resources that are determined to be archaeological interest, at least 100 years old, and located on lands owned by the federal or tribal governments. The MA SubCouncil believes that the projects in the Round 4 Preferred Alternative do not involve land that is or will be owned by the federal or tribal governments. Where applicable, the MA SubCouncil requires that the proper precautions and actions are taken with respect to these cultural resources.

National Historic Preservation Act of 1966 (16 U.S.C. 470)
Section 106 of this statute requires that federal agencies consider the effects of their actions on sites listed or eligible for listing on the National Register of Historic Places. If federal actions will impact such sites, the federal agency must consult with the state and local Historic Preservation Officers. Identification of such sites has not yet been performed for the projects in the Round 4 Preferred Alternative. The MA SubCouncil requires that potentially affected historic sites are identified and appropriately treated and will require project applicants to consult with state and local Historic Preservation Officers where applicable.

Bald and Golden Eagle Protection Act of 1940, as amended (16 U.S.C. 668-668d)
This law prohibits the killing, capturing, collecting, molestation, or disturbance of bald and golden eagles (*Haliaeetus leucocephalus* and *Aquila chrysaetos*, respectively), their nests, and critical habitat. The Preferred Alternative is not anticipated to adversely affect bald and golden eagles, their nests, or critical habitat. For projects in the Round 4 Preferred Alternative that may affect these natural resources, consultation under the ESA will be necessary and to ensure that adverse impacts are avoided.

Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. §§ 703-712 et seq.)
Under this law, it is unlawful to kill, import, export, possess, buy, or sell any bird listed under the MBTA or its feathers, body parts, nests, and eggs. The projects in the Round 4 Preferred Alternative are not anticipated to cause these illegal activities.

Federal Advisory Committee Act (FACA) of 1972 (86 Stat. 770, 5 U.S.C. Appendix 2)
The FACA applies to a formal group of private citizens brought together at the request of a federal agency to provide consensus advice or recommendations to the federal agency. Such a "FACA Committee" is required to be chartered with Congress. The USFWS is the federal Trustee agency on the MA SubCouncil and did not request consensus advice from any group of private citizens.

6.1.2 State Laws

Massachusetts Endangered Species Act (MESA), M.G.L. Ch. 131A
MESA works in much the same way as the federal ESA (Section 6.1.1, above) to list and protect rare species and their habitats. Like the federal ESA, MESA defines specific species as "endangered" or "threatened" and considers a third category as well: "species of special concern." MESA protects more species than the ESA; listed species include federally protected species as well as others of specific concern to Massachusetts. MESA is administered by the NHESP, which identifies rare species habitats and other high-priority natural areas. Compliance of the restoration projects with MESA overlaps ESA compliance. Where applicable, the MA SubCouncil requires that project applicants consult with NHESP to address whether aspects of proposed activities would have a negative effect on species designated as endangered, threatened, or of special concern by the Commonwealth.

Massachusetts Environmental Policy Act (MEPA), M.G.L. Ch. 30 § 61 et seq.
MEPA is the state equivalent of NEPA (Section 1.1, above). MEPA sets forth a process of environmental review and requires Commonwealth agencies to consider and minimize adverse environmental impacts of State actions on the environment. Like NEPA, MEPA requires public notification and comment before decisions are finalized. The documents used to assess impacts are the Environmental Notification Form and Environmental Impact Report, which must be approved by the MEPA office within the EEA before major State actions can proceed. The law applies to projects directly undertaken by State agencies as well as private projects seeking permits, funds, or lands from the State, but does not apply to private projects requiring local approval only. MEPA review is expressly required for projects that dredge, fill, or alter more than one acre of wetlands.

Since MEPA is somewhat more inclusive than NEPA, some actions that do not require NEPA review may require review under MEPA; in such cases, the MA SubCouncil will require project applicants to complete the required MEPA review process.

Public Waterfront Act (Chapter 91), M.G.L. Ch. 91
Chapter 91 is designed to protect public rights in Massachusetts waterways, not unlike the federal Rivers and Harbors Act, above, which it predates. It ensures that public rights

to fish, fowl, and navigation are not unreasonably restricted and that unsafe or hazardous structures are repaired or removed. Chapter 91 also protects the waterfront property owner's ability to approach his land from the water and helps protect wetland resource areas by requiring compliance with the WPA. It is administered by MassDEP's Division of Wetlands and Waterways through a program of permits and licenses. Chapter 91 authorization is required for alterations of tidelands, great ponds, and some rivers and streams, as well as for dredging and construction of piers, wharves, floats, retaining walls, revetments, pilings, bridges, dams, and some waterfront buildings. The WPA requires public, municipal, and agency notification before a project is authorized and provides for public hearings, review by affected parties, and the imposition of conditions before authorization is granted. Certain Chapter 91 projects also require MEPA review (see above). The MA SubCouncil will require that project applicants comply with Chapter 91 requirements.

Rivers Protection Act, St. 1996, Ch. 258

The Rivers Protection Act, passed in 1996, modifies the WPA (see below) to strengthen and expand existing protection of watercourses and the lands adjacent to them. The WPA establishes a "riverfront area" that extends 200 feet (25 feet in certain urban areas) from the mean annual high water line on each side of perennially flowing rivers and streams. The WPA requires projects in the riverfront area to meet two performance standards: no practicable alternatives and no significant adverse effect. The municipal conservation commission or MassDEP reviews projects to ensure that the riverfront area is protected for the eight interests in the WPA. Compliance with the Rivers Protection Act will be maintained through compliance with the WPA (see below).

Wetlands Protection Act (WPA), M.G.L. Ch. 131 § 40

The WPA restricts the alteration of inland and coastal wetland resource areas. Permit authority for the administration of the law is delegated to municipal conservation commissions or, in the case of an appeal, the MassDEP. The MA SubCouncil requires that project applicants maintain compliance with the WPA and WPA regulations, including obtaining the approval of the municipal conservation commission and/or other appropriate authorities before implementing actions within jurisdictional resource areas and notifying nearby landowners and other affected parties of planned actions as required.

Other Potentially Applicable State Laws

Massachusetts Clean Water Act, M.G.L. Ch. 21 §§ 26 through 53

Massachusetts 401 Water Quality Certification Program, 314 CMR § 9.00 (discussed under Clean Water Act above).

Article 97 of the Constitution of the Commonwealth of Massachusetts

Article 97 directs, in part, that land acquired by the state, for the purpose of conservation, shall not be used for other purposes or otherwise disposed of except by two-thirds vote of the state legislature. Round 4 land acquisition projects will be required to comply with Article 97 where applicable.

Conservation Restrictions, M.G.L. Ch. 184 §§ 31 through 33
Conservation restrictions are authorized by M.G. L. Ch. 184 §§ 31 through 33 and must be approved by the EEA.[21]

Land Acquisition Regulations
All acquisitions of real property for Article 97 purposes by any EEA agency must comply with the Land Acquisition Regulations, 301 CMR § 51.01

6.1.3 Local Laws

The projects in the Round 4 Preferred Alternative will be required to consider and comply with all applicable local laws and regulations, including but not limited to zoning ordinances, comprehensive plans, shoreline plans, growth management plans, construction grading or fill permits, noise permits, wetlands bylaws and permits, and other relevant laws, regulations, bylaws, and ordinances.

6.2 POLICIES AND DIRECTIVES

6.2.1 Federal Policies and Directives

The following describes federal policies and Presidential Executive Orders that may be relevant to the Preferred Alternative.

U.S. Fish and Wildlife Service (USFWS) Mitigation Policy (Fish and Wildlife Service Manual, 501 FW 2)
It is the policy of the USFWS to seek to mitigate losses of fish, wildlife, and their habitats, and uses thereof, from land and water developments. This policy seeks to ensure "no net loss" of fish and wildlife habitat. The MA SubCouncil does not anticipate that the projects in the Round 4 Preferred Alternative will result in adverse impacts to regulated resources; however, Round 4 projects will be required to comply with this policy if/as applicable.

Executive Order 11988 – Floodplain Management
This 1977 Executive Order directs federal agencies to avoid, to the extent possible, the long- and short-term adverse effects associated with the occupancy and modification of floodplains and to avoid direct or indirect support of development in floodplains wherever there is a practicable alternative. The projects in the Round 4 Preferred Alternative are consistent with this directive in that no new development is being endorsed in floodplains. Best management practices and environmentally-responsible engineering/design will minimize short-term impacts. In addition, some of the projects in the Round 4 Preferred Alternative will conserve, protect, and enhance the wildlife habitat values in floodplain areas of the Housatonic River through land acquisition that will prevent future development and the implementation of habitat restoration activities.

[21] Additional information is available in the EEA's Massachusetts Conservation Restriction Handbook, available at http://www.mass.gov/Eoeea/docs/eea/dcs/crhandbook08.pdf.

Executive Order 11990 – Protection of Wetlands

Executive Order 11990 instructs each federal agency to avoid, to the extent possible, the long- and short-term adverse effects associated with the destruction or modification of wetlands. It is not anticipated that the projects in the Round 4 Preferred Alternative will adversely affect wetlands; however, projects that may affect wetlands will require appropriate regulatory approvals and permits as outlined in the preceding sections.

Executive Order 12898 – Environmental Justice

This Order directs federal agencies to assess whether their actions have disproportionate adverse human health or environmental effects on minority or low-income populations. Based on a preliminary review of Environmental Justice population information obtained from the Massachusetts Geographic Information System (MassGIS), there are Environmental Justice populations in the Massachusetts in the Housatonic River watershed. It is anticipated that none of the projects in the Round 4 Preferred Alternative will adversely affect human health or the environment in minority or low-income populations.

Executive Order 13186 – Migratory Bird Protection

This Order directs federal agencies to avoid or minimize, to the extent possible, adverse impacts on migratory birds while conducting agency actions. None of the projects in the Round 4 Preferred Alternative are expected to cause adverse impacts to migratory birds, other than temporary disturbances during some construction activities. Rather, several projects, including those in the Wildlife Resources and Habitat restoration priority category, are anticipated to protect and enhance migratory bird habitat.

6.2.2 State and Local Policies and Directives

As appropriate, projects in the Preferred Alternative will be required to consider and comply with other relevant policies at the state and local levels (e.g., MassDEP Stormwater Standards, EEA Article 97 Land Disposition Policy, and EEA Land Acquisition Policies for Title Examination Reports, Appraisals, Environmental Site Assessments and Surveys), including Executive Order No. 569: Establishing an Integrated Climate Change Strategy for the Commonwealth. The MA SubCouncil anticipates that the Preferred Alternative will support Executive Order No. 569, increasing resilience related to large storm events and infrastructure management, habitat and habitat connectivity, and biodiversity.

7 LIST OF PREPARERS

Robin MacEwan Stantec Consulting Services Inc. 136 West Street, Suite 203 Northampton, MA 01060	**Michael Chelminski** Stantec Consulting Services Inc. 30 Park Drive Topsham, ME 04086
Molly Sperduto Natural Resource Damage Assessment & Restoration Program U.S. Fish and Wildlife Service 70 Commercial Street, Suite 300 Concord, NH 03301-5087	**Thomas M. Potter** Bureau of Waste Site Cleanup Massachusetts Department of Environmental Protection One Winter Street, 3rd Floor Boston, MA 02108
Lauren Bennett Natural Resource Damage Assessment & Restoration Program U.S. Fish and Wildlife Service 4R Fundy Road Falmouth, ME 04105	**Karen Pelto** Natural Resource Damages Program Massachusetts Department of Environmental Protection One Winter Street, 3rd Floor Boston, MA 02108
Cathy Kiley **Bureau of Waste Site Cleanup** Massachusetts Department of Environmental Protection One Winter Street, 3rd Floor Boston, MA 02108	**David Cameron** Wetlands & Waterways Program Bureau of Water Resources Western Region Office Massachusetts Department of Environmental Protection 436 Dwight Street, 5th Floor Springfield, MA 01103

8 LIST OF AGENCIES, ORGANIZATIONS, AND PARTIES CONSULTED FOR INFORMATION

Jennifer Sulla, Deputy General Counsel, EEA

Mark Barash, Senior Attorney, Office of the Solicitor, U.S. DOI

Robin Heubel, NRDAR Coordinator, North Atlantic-Appalachian Regional Office, USFWS

Lucas Rogers, General Counsel, MassDEP

9 PUBLIC COMMENTS RECEIVED WITH PROJECT APPLICATIONS

Public Comments Received with Project Application:

Restoration Project Application No. 401 -

Japanese Knotweed Control Along the Housatonic River

MASSWILDLIFE

DIVISION OF
FISHERIES & WILDLIFE

88 Old Windsor Road, Dalton, MA 01226
p: (413) 684 1646 | f: (413) 684 1705
MASS.GOV/MASSWILDLIFE

September 21, 2018

Thomas M. Potter
MA Sub Council Trustee Repetitive
Massachusetts Department of Environmental
Protection One Winter Street, 6th Floor
Boston, MA 02108

RE: Native Habitat Restoration, LLC. Housatonic River Natural Resources Damages Fund Proposal

Dear Mr. Potter & Trustees,

The Massachusetts Division of Fisheries and Wildlife (MassWildlife) is pleased to grant permission to Native Habitat Restoration for control of Japanese Knotweed on our land parcels along the Housatonic River.

Japanese knotweed is a prominent but undesirable feature on the MassWildlife held Housatonic River Access parcel in Great Barrington. Controlling and/or eliminating knotweed will be beneficial for users and wildlife habitat. We have complete confidence that Native Habitat Restoration will conduct the control efforts in a responsible and environmentally sensitive manner, in compliance with any MassWildlife requests or requirements. Therefore, we are comfortable granting permission and participating in this worthwhile effort should the request be funded.

Thank you for your time and consideration.

Sincerely,

Andrew Madden
Massachusetts Division of Fisheries and Wildlife
Western District Supervisor

Great Barrington
Land Conservancy

September 29, 2018

Thomas M. Potter
MA Sub Council Trustee
Massachusetts Department of Environmental Protection
One Winter Street, 6th Floor
Boston, MA 02108

Re: Native Habitat Restoration, LLC, Housatonic River Natural Resources Damages Fund Proposal

Dear Mr. Potter and the MA Sub Council of the Housatonic River Natural Resource Trustees,

The Great Barrington Land Conservancy strongly supports the ecological restoration proposal submitted by Native Habitat Restoration (NHR) to the Housatonic River Natural Resources Damages Fund.

We are a small town land conservancy that has embraced the restoration of the Housatonic River and its riverbank in many ways during our 26 years. Our most well-known project, the Housatonic River Walk, was created by volunteers working with GBLC to clean up a degraded riverside area and create a natural habitat and walkway off of our downtown. We work continuously to remove invasive species and restore a natural species habitat. These results have been recognized with the designation of National Recreation Trail. This restoration work has become a model of ecological restoration and is now being utilized elsewhere. GBLC has recently completed funding for development of The Riverfront Trail, which will be built in sections along the Housatonic River between Bridge Street and Brookside Road. We have noted Japanese knotweed along that trail route and we need to have that eradicated as part of our riverside restoration. We have experienced a large mass of Japanese knotweed on our riverside property on East Sheffield Road. We believe that our efforts to protect the riverside and provide community recreation will be enhanced by this project and the successful eradication of this pernicious plant. We specifically request that the Great Barrington Land Conservancy properties be included in this eradication program.

We are excited to be a part of this landscape-level restoration project and we are very happy to join our neighbors to protect the Housatonic River. We are already working with NHR to explore how best to tackle knotweed; with the funding provided by your program, we know we will soon have a day when native plants dominate the banks of our beautiful river. We are impressed by NHR's vision and the hard work they are putting into this proposal.

We hope NRD will fund this wonderful project for the benefit the River and the inhabitants of the watershed.

Sincerely,

Janice Kabel

Janice Kabel
President
Great Barrington Land Conservancy

Sheffield Chapel
1970 North Main Street, PO Box 308
Sheffield, Massachusetts 01257
(413) 528-2911

September 28, 2018

Thomas M. Potter
MA Sub Council Trustee Repetitive
Massachusetts Department of Environmental
Protection One Winter Street, 6th Floor
Boston, MA 02108

RE: Native Habitat Restoration, LLC. Housatonic River Natural Resources Damages Fund Proposal

Dear Mr. Potter & and the MA Sub Council of the Housatonic River Natural Resource Trustees,

As neighbors and friends of the Housatonic River I am in strong support of the ecological restoration proposal submitted by Native Habitat Restoration (NHR) to the Housatonic River Natural Resources Damages Fund.

As neighbors to the Housatonic River with ten years of happy memories here, we are excited to learn that the Japanese knotweed degrading the bank could soon be removed. We purchased property on the river because we were drawn to its beauty. Since that time, we have learned more about the river and the challenges that landowner's face as they try to be good stewards of their land. Japanese knotweed has always been a challenge to us: we see first-hand how the dense stands choke out all other life and we know from our neighbors' experience that this weed is nearly impossible to eradicate without the right tools and knowledge.

We are excited to be a part of this landscape-level restoration project and we are very happy to join our neighbors to protect the Housatonic River. We are already working with NHR to explore how best to tackle knotweed; with the funding provided by your program, we know we will soon have a day when native plants dominate the banks of our beautiful river!

We have always heard good things about NHR and the work they do throughout the Housatonic valley. We are impressed by their vision and the hard work they are putting into this proposal, the problem at hand, and the solution.

We hope NRD will fund this wonderful project that will immediately benefit the River and the inhabitants of the watershed. Thank you for reading our letter of support.

Sincerely,

Corey J McLaughlin

Pastor Corey J. McLaughlin
Sheffield Chapel
1970 North Main Street
Sheffield, MA 01257

Sheffield Land Trust

P.O. Box 940 • Sheffield, MA 01257-0940
(413) 229-0234 • fax (413) 229-0239
shefland@bcn.net • www.sheffieldland.org
Founded in 1989

Board of Directors
Susan Rothschild *President*
Kerry Douglas *Vice President*
Robert M. Thomas *Treasurer*
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Ken Schupp
Alicia Szendiuch
Don Ward
Sally C. Coos *Emerita*
Nancy South *Emerita*

Executive Directors
Kathy Orlando *Land Protection*
Bob Romnow *Operations*

September 29, 2018

Thomas M. Potter
MA Sub Council Trustee
Massachusetts Department of Environmental
Protection One Winter Street, 6th Floor
Boston, MA 02108

RE: Native Habitat Restoration, LLC. Housatonic River Natural Resources Damages Fund Proposal

Dear Mr. Potter & and the MA Sub Council of the Housatonic River Natural Resource Trustees,

The Sheffield Land Trust is pleased to have our Rob's Landing property along the Housatonic River included in Native Habitat Restoration's (NHR) proposal to treat Japanese Knotweed. The difference that the original treatment NHR did for us made to the property was dramatic in reducing the density and size of the knotweed infestation, but the last treatment was in 2015 and this follow-up is essential to be able to prevent it from resurging.

As with many invasive plant species, knotweed will re-establish from neighboring populations so the fact that NHR's proposal is for a landscape scale, treating multiple publicly and privately held properties from Brookside Road in Gt. Barrington to Kellogg Road in Sheffield is crucial to the overall success of this effort.

There is also added benefit beyond the treatment to our individual properties and the enhanced effectiveness of working at the landscape scale, there is a tremendous educational impact that comes from each property owner being more aware of the issue and continuing to be vigilant and to spread the word to others to do the same. We applaud NHR for being a consistent and knowledgeable advocate for the fight against invasive species and the importance of restoring our native species and ecosystems – on individual properties and in the larger landscape.

In addition to the habitat and ecosystem elements, this project is also important for access to the river. For years, Rob's Landing was a great place for the community to access the river by canoe or kayak, then for a period of time the very active nature of the Housatonic undermined the original put-ins and the presence of knotweed exacerbated the problem of creating alternative locations. In recent years, thanks to the prior knotweed treatment and the natural silt deposition process, access by canoe and kayak has again been possible so we want to maintain this access by fighting back the re-invasion of knotweed.

In closing, we are grateful to have this opportunity to participate in this effort to combat the invasion of Japanese Knotweed on our property and in the ecosystem at large and strongly support Native Habitat Restoration's ecological restoration proposal to the Housatonic River Natural Resources Damages Fund.

Please do not hesitate to be in touch with any questions you might have.

Sincerely,

Kathy Orlando
Executive Director, Land Protection

printed on recycled paper

APPALACHIAN TRAIL CONSERVANCY

September 14th, 2018

Thomas M. Potter
MA Sub Council Trustee Repetitive
Massachusetts Department of Environmental Protection
One Winter Street, 6th Floor
Boston, MA 02108

RE: Native Habitat Restoration, LLC. Housatonic River Natural Resources Damages Fund Proposal

Dear Mr. Potter & and the MA Sub Council of the Housatonic River Natural Resource Trustees,

The Appalachian Trail Conservancy's mission is to preserve and manage the Appalachian National Scenic Trail – ensuring its vast natural beauty and priceless cultural heritage can be shared and enjoyed today, tomorrow, and for centuries to come. As such, the Appalachian Trail Conservancy (ATC) is in strong support of the resource-based project proposal submitted by Native Habitat Restoration, LLC. (NHR) for the Housatonic River Natural Resources Damages Fund – Round 4.

As guardians of the Appalachian Trail (A.T.), its natural resources and its iconic hiking experience, the ATC works in partnership with the National Park Service (NPS), and the 31 AT Maintenance Clubs, to protect and steward the public lands within the A.T. corridor. Recent A.T. natural resource focus has been on the protection and restoration of high value species and their habitats, and the promotion of healthy and resilient ecosystems across the A.T. Landscape.

Treatment of Japanese knotweed (*Fallopia japonica*) along the section of A.T. that abuts the Housatonic River, located approximately 3 miles south of Great Barrington, has long been on the A.T. habitat restoration priority list. On both the east and west side of the river, the NPS owns lands totaling nearly 100 acres, for a stretch of .72 miles. While providing a unique visitor experience, the trail corridor in this area also serves as habitat for two species listed on the Mass Natural Heritage & Endangered Species Program Plant Watch List. Targeted treatment and removal of Japanese knotweed along the Housatonic River will address three of the four restoration priority categories outlined in the Final Restoration Project Selection Procedure; by protecting known high-value species and enhancing their riparian habitat, by improving water resource conditions and by heightening the visitor experience through increased wildlife and nature viewing opportunities.

In 2017, the ATC and the NPS collaboratively sought funding to begin addressing knotweed management concerns along the Housatonic. Through a NPS Regional Natural Resource Block Grant, $8,300 has been secured for the project. Funds are to be awarded across fiscal years 2019 and 2020, aligning well with the management timeline proposed by NHR. NPS Regional Natural Resource Block Grants are extremely competitive, and though the funding amount is relatively small, the selection of this and other A.T. NR projects by the Regional NPS Panel, demonstrates their high resource value.

While A.T. partners have prioritized the ongoing monitoring and management of the Housatonic River site, concerns remain around treatment feasibility. The high level of knotweed infestation on neighboring and nearby parcels up-stream of the A.T. corridor, contributes to the complexity of the project and decreases the overall probability of a successful management effort on NPS lands. For this reason, the ATC eagerly supports the Native Habitat Restoration, LLC. proposal, as it would help address management concerns on a landscape level, working towards a more significant and lasting benefit to the environment.

APPALACHIAN TRAIL
CONSERVANCY

The Appalachian Trail Conservancy has used, and continues to use, the contracted services of Native Habitat Restoration, LLC to address habitat restoration projects elsewhere on the A.T. in Massachusetts and Connecticut. The ATC has been very pleased with the treatment outcomes at these other sites and recognizes NHR as leader in the restoration field. The breadth of connections that NHR has to the community and other professionals in the field, furthers our confidence that NHR is uniquely poised to manage a project of this size and importance. The ATC staff look forward to continuing work with NHR and to improving the quality of the resources along the Housatonic River and the Appalachian National Scenic Trail.

We thank for the opportunity to provide a letter of support.

Sincerely,

Marian Orlousky
Northern Resource Management Coordinator
Appalachian Trail Conservancy
4 East First Street
Boiling Springs, PA 17007

September 31, 2018

Thomas M. Potter
MA Sub Council Trustee Repetitive
Massachusetts Department of Environmental Protection
One Winter Street, 6th Floor
Boston, MA 02108

RE: Native Habitat Restoration, LLC. Housatonic River Natural Resources Damages Fund Proposal

Dear Mr. Potter & and the MA Sub Council of the Housatonic River Natural Resource Trustees,

As neighbors and friends of the Housatonic River I am in strong support of the ecological restoration proposal submitted by Native Habitat Restoration (NHR) to the Housatonic River Natural Resources Damages Fund.

As neighbors to the Housatonic River with ten years of happy memories here, we are excited to learn that the Japanese knotweed degrading the bank could soon be removed. We purchased property on the river because we were drawn to its beauty. Since that time, we have learned more about the river and the challenges that landowner's face as they try to be good stewards of their land. Japanese knotweed has always been a challenge to us: we see first-hand how the dense stands choke out all other life and we know from our neighbors' experience that this weed is nearly impossible to eradicate without the right tools and knowledge.

We are excited to be a part of this landscape-level restoration project and we are very happy to join our neighbors to protect the Housatonic River. We are already working with NHR to explore how best to tackle knotweed; with the funding provided by your program, we know we will soon have a day when native plants dominate the banks of our beautiful river!

We have always heard good things about NHR and the work they do throughout the Housatonic valley. We are impressed by their vision and the hard work they are putting into this proposal, the problem at hand, and the solution.

We hope NRD will fund this wonderful project that will immediately benefit the River and the inhabitants of the watershed.

Thank you for reading our letter of support.

Sincerely,

Janet Elsbach
For the properties at 1601 & 1666 Boardman Street, Sheffield MA 01257

Public Comments Received with Project Application

Restoration Project Application No. 402 -

Churchull Brook Culvert Replacement

BERKSHIRE REGIONAL PLANNING COMMISSION
1 FENN STREET, SUITE 201, PITTSFIELD, MASSACHUSETTS 01201
TELEPHONE (413) 442-1521 · FAX (413) 442-1523
Massachusetts Relay Service: TTY: 771 or 1-800-439-2370
www.berkshireplanning.org

KYLE HANLON, Chair
SHEILA IRVIN, Vice-Chair
MARIE RAFTERY, Clerk
JOHN DUVAL, Treasurer

THOMAS MATUSZKO, A.I.C.P.
Executive Director

September 20, 2018

Dennis Regan, Berkshire Director
Housatonic Valley Association
14 Main Street
Stockbridge, MA 01262

RE: Churchill Street Culvert Replacement

Dear Mr. Regan,

The Berkshire Regional Planning Commission (BRPC) enthusiastically supports the proposal submitted by the Housatonic Valley Association (HVA) to the Natural Resource Damages (NRD) Program for the Churchill Street culvert replacement project. This project is the last step to complete the restoration of stream connectivity on Churchill Brook, which will reconnect 3 miles of unobstructed fish passage, and allow storm water to pass safety under Churchill Street.

This funding is sought to replace the second of two barrier culverts on Churchill Brook, a designated high-quality cold-water fisheries resource. HVA previously received NRD funds to assess the continuity effectiveness of road-stream crossings in the upper Housatonic Watershed, and the Churchill Brook culverts were identified as high priorities for beneficial habitat restoration.

HVA will partner with the Berkshire Environmental Action Team (BEAT), Trout Unlimited (TU) and the City of Pittsfield. HVA has worked with their project partners and a local engineering firm to design an open sided replacement culvert and secured permits. The proposed project will complete an important restoration project that is the last step toward reconnecting miles of unobstructed fish passage in a high priority, cold-water fishery. We hope that you look with favor upon this proposal.

Sincerely,

Thomas Matuszko, AICP
Executive Director

Public Comments Received with Project Application:

Restoration Project Application No. 403 -
Land Acquisition Project #1

[*As described in the Round 4 RP/SEA, project-specific information regarding land acquisition applications (including public comment letters submitted with Project Applications) is withheld at this time due to the unique sensitivities of land acquisition projects*.]

Public Comments Received with Project Application:

Restoration Project Application No. 404 -
Land Acquisition Project #2

[*As described in the Round 4 RP/SEA, project-specific information regarding land acquisition applications (including public comment letters submitted with Project Applications) is withheld at this time due to the unique sensitivities of land acquisition projects*.]

Public Comments Received with Project Application:

Restoration Project Application No. 405 -

Calcareous Fen Restoration

Massachusetts Department of Fish and Game
Division of Ecological Restoration
Invested in Nature and Community
Beth Lambert, Director
Hunt Durey, Deputy Director

Charles D. Baker
Governor
Karyn E. Polito
Lieutenant Governor
Matthew A. Beaton
Secretary
Ronald S. Amidon
Commissioner
Mary-Lee King
Deputy Commissioner

September 26, 2018

Mr. Chris Buelow, Senior Restoration Ecologist
Natural Heritage and Endangered Species Program (NHESP)
Department of Fish and Game, Division of Fisheries and Wildlife

Sent via electronic-mail

RE: Housatonic River Natural Resource Damages Fund / Round 4 Project Proposals
Calcareous Fen Restoration Project (Housatonic River Watershed)

Dear Mr. Buelow,

On behalf of the Massachusetts Division of Ecological Restoration (DER), I write to express our strong support for the Natural Heritage and Endangered Species Program's (NHESP) Calcareous Fen Restoration Proposal. DER staff has assisted in the preliminary conceptual design for the Jug End Fen site (Egremont), and we look forward to continued involvement as that effort progresses. In addition, we look forward to similar involvement in the Kampoosa Bog (Stockbridge) assessment and planning for wetland restoration actions. Both of these sites appear to be impaired by anthropogenic fill and structures in the historic wetland. Your approach to combine monitoring, restoration and management actions, and adaptive management should lead to re-naturalized hydrology in these sensitive wetlands.

The NHESP proposal aligns well with the priorities of the Housatonic River Natural Resources Damages Fund. The project aims to restore natural ecological processes to one of the rarest wetland habitat types in Massachusetts, and helps directly assess and address existing stressors that are impairing ecological conditions. As top priority sites for MassWildlife conservation, we appreciate the challenges of on-going management to protect these special wetland communities. The requested NRD financial assistance will help accomplish the needed restoration actions for each site, and help maintain the ecological health of these rare wetland habitats in the future.

Please contact DER's Restoration Ecologist Alex Hackman at 617-626-1548 or alex.hackman@state.ma.us with any questions you may have about this letter. We support your funding request to the NRD program, and look forward to working together on these sites.

Sincerely,

Beth Lambert

Beth Lambert, Director

The Nature Conservancy

September 25, 2018

Dear MassDEP Grant Review Team,

I am writing to offer our support of the project titled *"Calcareous Fen Restoration"* submitted by the Massachusetts Division of Fisheries and Wildlife (DFW). The proposed restoration work will greatly improve wildlife habitat in the Schenob Brook wetlands, which is a state designated Area of Critical Environmental Concern and a globally rare wetland within the Housatonic River watershed.

The proposed project is requesting permission to complete habitat management activities within the following conservation restrictions that are held by The Nature Conservancy:

Nancy Smith (40 acres) 1529 South Undermountain Road, Sheffield, MA
Emily Fisher (15 acres) 517 Kelsey Road, Sheffield, MA
George Oleen (100 acres), 997 Foley Road, Sheffield, MA

The management activities proposed in the DFW project are in compliance with the terms of these conservation restrictions. The terms of the CR authorize TNC permission to conduct necessary habitat management and we have also secured verbal and/or written permission from all the landowners. We anticipate working closely with DFW on the scope and details of the project to ensure that all work remains consistent with the conservation restrictions. It is our understanding that DFW will contract out this work and that they will be responsible to for insuring that all work abides by the terms of the conservation restrictions.

Thank you for your consideration of this important restoration work.

Sincerely,

Karen Lombard

Karen Lombard
Director of Stewardship and Restoration
Massachusetts Chapter

MASSACHUSETTS CHAPTER
99 Bedford Street, Suite 500
Boston, MA 02111

Phone (617) 532-8300
Fax (617) 532-8400

nature.org

KAMPOOSA STEWARDSHIP COMMITTEE

To restore and preserve the Bog by fostering community stewardship of the Kampoosa Bog Drainage Basin ACEC

September 24, 2018

Mass. SubCouncil of the Housatonic River Natural Resources Trustees
c/o Thomas Potter, State Trustee Representative
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108

Re: Housatonic River Natural Resource Damages Fund Grant Application

Dear Trustees:

The Kampoosa Stewardship Committee sends this letter to state its wholehearted support for the proposal before you for the Calcareous Fen Restoration Project, being submitted by the Mass. Natural Heritage & Endangered Species Program (NHESP). Kampoosa is the largest, most diverse and pristine Calcareous Basin Fen in Massachusetts. This type of wetland is nationally rare and is considered by NHESP as S1 Critically Imperiled in the Commonwealth, meaning that five or fewer good examples remain in the state. The habitat includes a floating mat of vegetation but, while a bog typically would have a very acidic environment with little inflow of water and a mat of sphagnum moss, Kampoosa has inflow of mineral-rich alkaline water and sphagnum moss overlaid with a sedge mat. This unusual chemistry and floating mat support a high concentration of highly specialized calciphilic plants, many of which are considered extremely rare and found at very few places in Massachusetts. The watershed hosts 22 rare plant species, two rare animal species and many other species uncommon in the state.

In addition to the basin fen, the watershed supports two NHESP-listed Priority Natural Communities: 1) Black Ash-Red Maple-Tamarack Calcareous Seepage Swamp (S2-Imperiled), with Kampoosa noted as one of the highest quality in the state for its large size, extensive natural buffer, and many state-listed rare species, and 2) Rich Mesic Forest, noted for their moist unusually nutrient-rich soils and diverse herbaceous layer that includes many ephemeral plant species. NHESP also considers the Kampoosa Bog Watershed as a Regional Priority Conservation Area.

The unique ecosystem of Kampoosa Bog is threatened by a litany of invasive plant species, the control of which requires constant monitoring and subsequent control and restoration efforts. Monitoring, mapping and invasive species treatment of the Bog began in earnest in 1993, but by 2005 there were 39 distinct patches of *Phragmites australis* identified, ranging in size from 1/8 of acre to more than 7 acres. Rare native orchids, seen prior to this time, had disappeared. Painstaking invasive plant control efforts were undertaken by The Nature Conservancy, NHESP, Tennessee Gas Pipeline and the Turnpike Authority, and by 2010 all of the most threatening patches of Phragmites had been treated.

While we believe we are winning the battle against invasive species, only time will tell if we reached a point where we can say that we've won the war. Monitoring and treatment is ongoing, but we have now attained a level of invasive species control that is deemed sustainable within the Kampoosa Bog ACEC. Where our original battles were exhausting and seemingly unattainable, our current patrols are exponentially less intimidating. However, we are now also facing hydrologic changes in the Bog that threaten the delicate balance of inundation needed to support many of the species found here. Support from the Housatonic River Natural Resource Damages Fund will allow NHESP to not only continue invasive species control, but to also monitor and implement hydrologic level controls.

MassWildlife and NHESP have a vested interest in Kampoosa Bog not only because of their missions to protect and restore rare natural ecosystems, but because MassWildlife is a landowner within the Kampoosa Bog ACEC. Both agencies express this vested interest by also serving as members of the Kampoosa Bog Stewardship Committee. The complete list of Committee members can be found on the following page.

For all the reasons discussed here, we respectfully request that you look with favor at the proposal before you. If you have any questions regarding the environmental significance of the Kampoosa Bog ACEC, or if you would like more information about the Kampoosa Stewardship Committee, please do not hesitate to contact co-chairs Jessica Murray Toro (jessmtoro@gmail) or Lauren Gaherty (lgaherty@berkshireplanning.org).

Sincerely,

Jessica Murray Toro

Lauren Gaherty

KAMPOOSA STEWARDSHIP COMMITTEE

To restore and preserve the Bog by fostering community stewardship of the Kampoosa Bog Drainage Basin ACEC

Kampoosa Stewardship Committee Membership

Berkshire Regional Planning Commission
Berkshire Natural Resource Council
Marian Fathers of the Immaculate Conception*
Mass. Dept. of Conservation & Recreation
Mass. Dept. of Transportation*
Mass. Division of Fisheries and Wildlife*
Mass. Natural Heritage & Endangered Species Program
Native Habitat Restoration, Inc.
Stockbridge Land Trust
Stockbridge Landowners*
Tennessee Gas Pipeline*
The Nature Conservancy*
Town of Stockbridge Conservation Commission

**Denotes land ownership or easements within the Kampoosa Bog ACEC*

The Nature Conservancy

September 25, 2018

Dear MassDEP Grant Review Team,

I am writing to offer our support of the project titled *"Calcareous Fen Restoration"* submitted by the Massachusetts Division of Fisheries and Wildlife (DFW). The proposed restoration work will greatly improve wildlife habitat in the Schenob Brook and Jug End wetlands. Both are state designated Areas of Critical Environmental Concern and globally rare wetlands within the Housatonic River watershed.

The Schenob Brook Preserve (2,072 acres) is The Nature Conservancy's (TNC) largest preserve in Massachusetts and protects a large calcareous wetland complex surrounding Schenob Brook. Drawn to rare natural communities and the over 250 individual rare species (numerous state and one federally-listed species) that occur at the site within these wetlands, TNC initiated research and land protection here in the 1980s. These calcareous wetlands were identified as an important regional site in The Nature Conservancy's Lower New England Ecoregional Plan in 2001, as an important local conservation target in a 2004 Conservation plan for TNC's Berkshire Taconic Landscape, and most recently Schenob was identified as having above average resilience to climate change (Resilient Sites for Terrestrial Conservation in the Northeast and Mid-Atlantic Region, TNC, Mark Anderson et al, 2012). Additionally, most of the preserve has been identified as priority BioMap2 core habitat. Schenob contains many of the habitats for the Species of Greatest Conservation Need as identified in the 2015 State Wildlife Action plan, as well as multiple Tier 1 Natural Communities.

Our Jug End Preserve (229 acres) lies within the Karner Brook Area of Critical Environmental Concern and is adjacent to the Jug End State Reservation. It is also home to numerous rare species. The site has been identified as an important local and regional conservation target by TNC's Lower New England Ecoregional Plan and the Berkshire Taconic Landscape Conservation Plan. It is also mapped as Biomap2 core habitat and has multiple habitats for Species of Greatest Conservation Need and habitats identified as Tier 1 Natural Communities.

MASSACHUSETTS CHAPTER
99 Bedford Street, Suite 500
Boston, MA 02111

Phone (617) 532-8300
Fax (617) 532-8400

nature.org

The Nature Conservancy

For over 30 years TNC has committed resources to monitoring and managing these rare species and their habitat at these preserves. Due to that commitment, these rare species populations have not only been protected, but are thriving where our management efforts have been most focused. Our success at these two sites has largely been due to a very successful network of partners, including the Div. of Fisheries and Wildlife. Over the years we have collaborated on various land protection and habitat management projects at both sites. We meet regularly to discuss goals and review management opportunities. At Jug End in particular, we have a deep level of collaboration because DFW holds a conservation restriction over most of our land.

While our management efforts have meant a great success at Schenob, the situation at Jug End is at a pivotal moment where we need to do more. We currently have a great team of dedicated experts from various specialties in natural resource management with a great plan for how we can take our restoration to the next level at Schenob and a clear vision for how to make significant and long-term impacts at Jug End. Funding from the NRD trust will be critical to Div. of Fisheries and Wildlife being able to successfully implement this work.

Sincerely,

Karen Lombard

Karen Lombard
Director of Stewardship and Restoration
Massachusetts Chapter

MASSACHUSETTS CHAPTER
99 Bedford Street, Suite 500
Boston, MA 02111

Phone (617) 532-8300
Fax (617) 532-8400

nature.org

Public Comments Received with Project Application:

Restoration Project Application No. 406 -
Land Acquisition Project #3

[*As described in the Round 4 RP/SEA, project-specific information regarding land acquisition applications (including public comment letters submitted with Project Applications) is withheld at this time due to the unique sensitivities of land acquisition projects*.]

Public Comments Received with Project Application:

Restoration Project Application No. 407 -
Alford Springs Culvert Improvement Project

[*No Public Comments received with Project Application*]

Public Comments Received with Project Application:

Restoration Project Application No. 408 -

Housatonic River Watershed Education Programs

Lee Elementary School

310 Greylock Street, Lee, Massachusetts 01238

Telephone 413-243-0336
413-243-0337
Sped Office 413-243-9715
Fax 413-243-8216

Kathryn Retzel
Principal
klretzel@leepublicschools.net

Rachel Wildrick
School Psychologist
rwildrick@leepublicschools.net

Jennifer Norton
Special Education Director
jlnorton@leepublicschools.net

September 20, 2018

MassDEP Grant Review Team
Housatonic River Natural Resource Damages Fund
Round 4 Restoration Project Proposals

Dear Grant Review Team Members:

The administration and teachers at Lee Elementary School are eager to participate in the Housatonic River Watershed Education Program proposed by Mass Audubon's Berkshire Wildlife Sanctuaries. Mass Audubon offers high quality science residencies that support our teachers and students in engaging actively with the Life and Earth Science curricula. They recently have worked in our school, and we hope to continue and expand this partnership in future years.

Mass Audubon's programs enrich the educational experience of our students and teachers and expand the capacity to achieve academic excellence in our school district. Mass Audubon provides classroom and field science experiences that reinforce learning in core earth and life science subjects. The proposal to bring an expanded Housatonic River Watershed Education Program to our students would help our school address state standards related to life cycles, water quality, ecosystem dynamics, climate change, and other science subjects. We are thrilled to have ways to make this potentially abstract learning more concrete and grounded in the local landscapes and ecosystems. The wildlife sanctuary and canoe trip experiences reinforce students' connection to and understanding of their watershed, planting the seed for lifelong stewardship of these natural resources.

We strongly support Mass Audubon's application for funding through the Mass DEP's Natural Resource Damages Assessment and Restoration Program. This funding would support a highly desired opportunity for our school to work with Mass Audubon's science specialists on learning that is critical to the future health of our precious water resources in the Upper Housatonic River Watershed. Please fund this proposal.

Thank you for your consideration.

Sincerely,

Kate Retzel

Kate Retzel
Principal

"A Place to Shine"

Monument Valley Regional Middle School

Ben Doren, Principal

Miles Wheat, Assistant Principal

September 20, 2018

MassDEP Grant Review Team
Housatonic River Natural Resource Damages Fund
Round 4 Restoration Project Proposals

Dear Grant Review Team Members:

The administration and teachers at Monument Valley Regional Middle School are eager to participate in the Housatonic River Watershed Education Program proposed by Mass Audubon's Berkshire Wildlife Sanctuaries. Mass Audubon offers high quality science residencies that support our teachers and students in engaging actively with the Life and Earth Science curricula. They recently have worked in our school, and we hope to continue and expand this partnership in future years.

Mass Audubon's programs enrich the educational experience of our students and teachers and expand the capacity to achieve academic excellence in our school district. Mass Audubon provides classroom and field science experiences that reinforce learning in core earth and life science subjects. The proposal to bring an expanded Housatonic River Watershed Education Program to our students would help our school address state standards related to life cycles, water quality, ecosystem dynamics, climate change, and other science subjects. We are thrilled to have ways to make this potentially abstract learning more concrete and grounded in the local landscapes and ecosystems. The wildlife sanctuary and canoe trip experiences reinforce students' connection to and understanding of their watershed, planting the seed for lifelong stewardship of these natural resources.

We strongly support Mass Audubon's application for funding through the Mass DEP's Natural Resource Damages Assessment and Restoration Program. This funding would support a highly desired opportunity for our school to work with Mass Audubon's science specialists on learning that is critical to the future health of our precious water resources in the Upper Housatonic River Watershed. Please fund this proposal.

Thank you for your consideration.

Sincerely,

Ben Doren
Principal

313 Monument Valley Road · Great Barrington, Massachusetts 01230 · (413) 644-2300

Morris Elementary School

129 West Street
Lenox, Massachusetts 01240
Telephone: (413)-637-5570
Fax: (413)-637- 5511

Peter J. Bachli
Principal
pbachli@lenoxps.org

September 20, 2018

MassDEP Grant Review Team
Housatonic River Natural Resource Damages Fund
Round 4 Restoration Project Proposals

Dear Grant Review Team Members:

The administration and teachers at Morris Elementary School in Lenox, MA are eager to participate in the Housatonic River Watershed Education Program proposed by Mass Audubon's Berkshire Wildlife Sanctuaries. Mass Audubon offers high quality science residencies that support our teachers and students in engaging actively with the Life and Earth Science curricula. They recently have worked in our school, and we hope to continue and expand this partnership in future years.

Mass Audubon's programs enrich the educational experience of our students and teachers and expand the capacity to achieve academic excellence in our school district. Mass Audubon provides classroom and field science experiences that reinforce learning in core earth and life science subjects. The proposal to bring an expanded Housatonic River Watershed Education Program to our students would help our school address state standards related to life cycles, water quality, ecosystem dynamics, climate change, and other science subjects. We are thrilled to have ways to make this potentially abstract learning more concrete and grounded in the local landscapes and ecosystems. The wildlife sanctuary and canoe trip experiences reinforce students' connection to and understanding of their watershed, planting the seed for lifelong stewardship of these natural resources.

We strongly support Mass Audubon's application for funding through the Mass DEP's Natural Resource Damages Assessment and Restoration Program. This funding would support a highly desired opportunity for our school to work with Mass Audubon's science specialists on learning that is critical to the future health of our precious water resources in the Upper Housatonic River Watershed. Please fund this proposal.

Thank you for your consideration.

Sincerely,

Peter J. Bachli

Non-discrimination and equal opportunity are the policy of the Lenox Public Schools in all of its educational programs, activities, and employment practices. No person shall be excluded from or discriminated from participation or workplace advancement on the basis of race, color, sex, gender identity, religion, national origin, sexual orientation, limited English proficiency, housing status, or disability.

Stearns Elementary School

75 Lebanon Avenue

Pittsfield, Massachusetts 01201

Sara Luciani
Principal

413.499.9554 • Fax 413.499.9514
sluciani@pittsfield.net

September 20, 2018

MassDEP Grant Review Team
Housatonic River Natural Resource Damages Fund
Round 4 Restoration Project Proposals

Dear Grant Review Team Members:

The administration and teachers at Stearns Elementary School are eager to participate in the Housatonic River Watershed Education Program proposed by Mass Audubon's Berkshire Wildlife Sanctuaries. Mass Audubon offers high quality science residencies that support our teachers and students in engaging actively with the Life and Earth Science curricula. They recently have worked in our school, and we hope to continue and expand this partnership in future years.

Mass Audubon's programs enrich the educational experience of our students and teachers and expand the capacity to achieve academic excellence in our school district. Mass Audubon provides classroom and field science experiences that reinforce learning in core earth and life science subjects. The proposal to bring an expanded Housatonic River Watershed Education Program to our students would help our school address state standards related to life cycles, water quality, ecosystem dynamics, climate change, and other science subjects. We are thrilled to have ways to make this potentially abstract learning more concrete and grounded in the local landscapes and ecosystems. The wildlife sanctuary and canoe trip experiences reinforce students' connection to and understanding of their watershed, planting the seed for lifelong stewardship of these natural resources.

We strongly support Mass Audubon's application for funding through the Mass DEP's Natural Resource Damages Assessment and Restoration Program. This funding would support a highly desired opportunity for our school to work with Mass Audubon's science specialists on learning that is critical to the future health of our precious water resources in the Upper Housatonic River Watershed. Please fund this proposal.

Thank you for your consideration.

Sincerely,
Sara Luciani
Sara Luciani
Principal

Public Comments Received with Project Application:

Restoration Project Application No. 409 -
Land Acquisition Project #4

[*As described in the Round 4 RP/SEA, project-specific information regarding land acquisition applications (including public comment letters submitted with Project Applications) is withheld at this time due to the unique sensitivities of land acquisition projects*.]

Public Comments Received with Project Application:

Restoration Project Application No. 410 -
Planning for Flood Resilient and Fish Friendly Road-Stream Crossings in the Berkshire Hills

TOWN HALL

Town of Alford

Alford Town Hall • 5 Alford Center Rd. • Alford, MA 01230

INCORPORATED
1773
ALFORD
MASSACHUSETTS
(413) 528-4536
FAX (413) 528-4581

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

9/25/2018

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

This letter indicates the Town of Alford's full support for the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. The Town of Alford has a vested interest in improving the resiliency of both our municipal and environmental systems, in the face of climate change, and we are committed to partnering with HVA throughout the Management Plan development process. The Town cannot afford to make the necessary culvert upgrades and replacements without assistance. We have raised some of our own funds, but this grant would be a tremendous help to a small town such as Alford.

Final Road-Stream Crossing Management Plans will include: town-scale comprehensive bridge and culvert inventories, replacement project prioritization, conceptual design for replacing a priority structure that demonstrates MA Stream Crossing Standards/Stream Simulation Design, recommendations and supporting information, and official municipal adoption as part of each town's Natural Hazard Mitigation Plan. Over the past several years, HVA has refined the following five-step process for developing town-scale management plans:

1) Update stream habitat continuity assessments for all stream crossing structures in target towns,
2) Model risk of failure at all non-bridge structures in target towns,
3) Create Road-Stream Crossing Inventory documents and use these to work with Town leaders and partners to identify priority replacement projects,
4) Develop conceptual design plans and implementation strategies for replacement projects at a priority crossing,

5) Assemble Road-Stream Crossing Management Plan documents for each target town and facilitate municipal adoption.

The proposed project will be extremely beneficial to the conservation goals the Town of Alford endorses, and is the direct, hands-on assistance needed to proceed with project implementation. This grant would fund a crucial step in upgrading town road-stream crossings that currently act as barriers to the movement of aquatic organisms, restricting access to upstream pathways for coldwater species that are negatively affected by climate change, such as native brook trout. In addition to restoring habitat connectivity, these upgrades would reduce the risk of culvert failure and road closures, a risk made more urgent given the increased frequency and intensity of severe storm events in this region. Upgrading failing culverts to structures that will be more sustainable over the long-term can ultimately lead to savings in maintenance costs for the Town of Alford

HVA has a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region. We look forward to the opportunity that this project presents for the Town of Alford and regional conservation, and HVA has our full support and commitment for this endeavor.

Charles F. Ketchen

CHARLES F. KETCHEN
CHAIRMAN BOS
TOWN OF ALFORD, MASS.

TOWN OF EGREMONT
Highway Department
P.O. Box 368
South Egremont, MA 01258-0368
Telephone 413.528.1106

September 26, 2018

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

This letter indicates the Town of Egremont's full support for the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. The Town of Egremont has a vested interest in improving the resiliency of both its municipal and environmental systems, in the face of climate change, and the Town is committed to partnering with HVA throughout the Management Plan development process. Egremont's goals are to protect public and private water supplies, groundwater supply, flood control, storm damage protection, prevention of pollution, and protection of wildlife habitat through the Wetlands Protection Act (WPA: MGL Ch 131, S.40), and the Rivers Protection Act (Acts of 1996, Ch. 258). The regulations prohibit any filling, excavation or other alteration of the land surface, water levels, or vegetation in or near wetlands without permits from the local Conservation Commission.

Final Road-Stream Crossing Management Plans will include: town-scale comprehensive bridge and culvert inventories, replacement project prioritization, conceptual design for replacing a priority structure that demonstrates MA Stream Crossing Standards/Stream Simulation Design, recommendations and supporting information, and official municipal adoption as part of each town's Natural Hazard Mitigation Plan. Over the past several years, HVA has refined the following five-step process for developing town-scale management plans:

1) Update stream habitat continuity assessments for all stream crossing structures in target towns,
2) Model risk of failure at all non-bridge structures in target towns,
3) Create Road-Stream Crossing Inventory documents and use these to work with Town leaders and partners to identify priority replacement projects,
4) Develop conceptual design plans and implementation strategies for replacement projects at a priority crossing,
5) Assemble Road-Stream Crossing Management Plan documents for each target town and facilitate municipal adoption.

The proposed project will be extremely beneficial to the conservation goals the Town of Egremont endorses, and is the direct, hands-on assistance needed to proceed with project implementation. This grant would fund a crucial step in upgrading town road-stream crossings that currently act as barriers to the movement of aquatic organisms, restricting access to upstream pathways for coldwater species that are negatively affected by climate change, such as native brook trout. In addition to restoring habitat connectivity, these upgrades would reduce the risk of culvert failure and road closures, a risk made more urgent given the increased frequency and intensity of severe storm events in this region. Upgrading failing culverts to structures that will be more sustainable over the long-term can ultimately lead to savings in maintenance costs for the Town of Egremont

The Highway Department has sought and received funding from the Town for equipment and road improvement over the years. Purchases have included hand tools, mowing equipment, signage and personal protective gear. The Town recently purchased a new dump truck and backhoe/loader. This huge financial commitment on the part of our local taxpayers signifies their support for the Department, and their recognition that the old equipment was past due to be replaced. In light of the substantial cost to the local taxpayers associated with these purchases, the Highway Department recognizes that any effort to seek additional funds from local sources for updates to culverts and mapping of infrastructure is neither economically nor politically feasible.

HVA has a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region. We look forward to the opportunity that this project presents for the Town of Egremont and regional conservation, and HVA has our full support and commitment for this endeavor.

Sincerely,

J. P. Noe

James Noe
Highway Superintendent
Town of Egremont

Town Hall, 334 Main Street

Great Barrington, MA 01230

TOWN OF GREAT BARRINGTON
MASSACHUSETTS

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

September 28, 2018

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

This letter indicates the Town of Great Barrington's full support for the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. The Town of Great Barrington has a vested interest in improving the resiliency of both our municipal and environmental systems, in the face of climate change, and we are committed to partnering with HVA throughout the Management Plan development process.

Final Road-Stream Crossing Management Plans will include: town-scale comprehensive bridge and culvert inventories, replacement project prioritization, conceptual design for replacing a priority structure that demonstrates MA Stream Crossing Standards/Stream Simulation Design, recommendations and supporting information, and official municipal adoption as part of each town's Natural Hazard Mitigation Plan. Over the past several years, HVA has refined the following five-step process for developing town-scale management plans:

1) Update stream habitat continuity assessments for all stream crossing structures in target towns,
2) Model risk of failure at all non-bridge structures in target towns,
3) Create Road-Stream Crossing Inventory documents and use these to work with Town leaders and partners to identify priority replacement projects,
4) Develop conceptual design plans and implementation strategies for replacement projects at a priority crossing,

5) Assemble Road-Stream Crossing Management Plan documents for each target town and facilitate municipal adoption.

The proposed project will be extremely beneficial to the conservation goals the Town of Great Barrington endorses, and is the direct, hands-on assistance needed to proceed with project implementation. This grant would fund a crucial step in upgrading town road-stream crossings that currently act as barriers to the movement of aquatic organisms, restricting access to upstream pathways for coldwater species that are negatively affected by climate change, such as native brook trout. In addition to restoring habitat connectivity, these upgrades would reduce the risk of culvert failure and road closures, a risk made more urgent given the increased frequency and intensity of severe storm events in this region. Upgrading failing culverts to structures that will be more sustainable over the long-term can ultimately lead to savings in maintenance costs for the Town of Great Barrington

HVA has a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region. We look forward to the opportunity that this project presents for the Town of Great Barrington and regional conservation, and HVA has our full support and commitment for this endeavor.

Sincerely,

Sean VanDeusen

DPW Superintendent

Town of Great Barrington

TOWN OF RICHMOND
DEPARTMENT OF PUBLIC WORKS
PO BOX 145, 53 FIREHOUSE LANE
RICHMOND, MA 01254

PETER BECKWITH, JR.
HIGHWAY SUPERINTENDENT

PHONE: 413-698-3833
FAX: 413-698-2077
EMAIL: highway@richmondma.org

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

September 25, 2018

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

This letter indicates the Town of Richmond's full support for the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. The Town of Richmond has a vested interest in improving the resiliency of both our municipal and environmental systems, in the face of climate change, and we are committed to partnering with HVA throughout the Management Plan development process.

Final Road-Stream Crossing Management Plans will include: town-scale comprehensive bridge and culvert inventories, replacement project prioritization, conceptual design for replacing a priority structure that demonstrates MA Stream Crossing Standards/Stream Simulation Design, recommendations and supporting information, and official municipal adoption as part of each town's Natural Hazard Mitigation Plan. Over the past several years, HVA has refined the following five-step process for developing town-scale management plans:

1) Update stream habitat continuity assessments for all stream crossing structures in target towns,
2) Model risk of failure at all non-bridge structures in target towns,
3) Create Road-Stream Crossing Inventory documents and use these to work with Town leaders and partners to identify priority replacement projects,
4) Develop conceptual design plans and implementation strategies for replacement projects at a priority crossing,
5) Assemble Road-Stream Crossing Management Plan documents for each target town and facilitate municipal adoption.

The proposed project will be extremely beneficial to the conservation goals the Town of Richmond endorses, and is the direct, hands-on assistance needed to proceed with project implementation. This grant would fund a crucial step in upgrading town road-stream crossings that currently act as barriers to the movement of aquatic organisms, restricting access to upstream pathways for coldwater species that are negatively affected by climate change, such as native brook trout. In addition to restoring habitat connectivity, these upgrades would reduce the risk of culvert failure and road closures, a risk made more urgent given the increased frequency and intensity of severe storm events in this region. Upgrading failing culverts to structures that will be more sustainable over the long-term can ultimately lead to savings in maintenance costs for the Town of Richmond

HVA has a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region. We look forward to the opportunity that this project presents for the Town of Richmond and regional conservation, and HVA has our full support and commitment for this endeavor.

Sincerely,

Peter Beckwith, Jr.
Highway Superintendent
Richmond DPW

Board of Selectmen

9 Main Street West Stockbridge, Mass. 01266-0525

Tel. (413) 232-0319
Fax. (413) 232-7195
E-mail: bosws@bcn.net

John Wright
Coordinator
National Fish and Wildlife Foundation (NFWF), Northeastern Regional Office
1133 Fifteenth St NW, Suite 1000
Washington, DC 20005

April 20,2018
RE: NFWF New England Forests and Rivers Fund

Dear Mr. Wright,
This letter indicates the town of West Stockbridge support for the Housatonic Valley Association's (HVA) application for a grant from the New England Forests and Rivers Fund for planned culvert replacement projects in five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. The Town of West Stockbridge has a vested interest in improving the resiliency of both our municipal and environmental systems, in the face of climate change.
This grant would fund a crucial step in upgrading road-stream crossings that currently act as barriers to the movement of aquatic organisms, restricting access to upstream pathways for coldwater species that are negatively affected by climate change, such as native brook trout. In addition to restoring habitat connectivity, these upgrades would reduce the risk of culvert failure and road closures, a risk made more urgent given the increased frequency and intensity of severe storm events in this region. HVA's proposal to develop town-scale Road-Stream Crossing Management Plans for five communities in the Berkshires will be extremely beneficial to the conservation goals that we endorse. This proposal to provide town-scale comprehensive bridge and culvert inventories, replacement project prioritizations, and conceptual designs for replacing priority structures that demonstrate Stream Simulation Design, is the direct, hands-on assistance needed to proceed with implementation. Upgrading failing culverts to structures that will be more sustainable over the long-term can ultimately lead to savings in maintenance costs for the Town of West stockbridge.
HVA has a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region. We look forward to the opportunity that this project presents for the Town of West Stockbridge and regional conservation, and HVA has our full support for this endeavor.
Sincerely,
Curt G. Wilton
Highway Superintendent
The Town of West Stockbridge

TOWN HALL

Town of Alford

Alford Town Hall • 5 Alford Center Rd. • Alford, MA 01230

INCORPORATED
1773
ALFORD
MASSACHUSETTS
(413) 528-4536
FAX (413) 528-4581

September 27, 2018

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

I am writing this letter in support for the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. The Alford Conservation Commission heartily endorses this application.

This grant would fund a crucial step in upgrading road-stream crossings that currently act as barriers to the movement of aquatic organisms, restricting access to upstream pathways for coldwater species that are negatively affected by climate change, such as native brook trout. In addition to restoring habitat connectivity, these upgrades would reduce the risk of culvert failure and road closures, a risk made more urgent given the increased frequency and intensity of severe storm events in this region. HVA's proposal to develop town-scale Road-Stream Crossing Management Plans for five communities in the Berkshires will be extremely beneficial to the conservation goals that we endorse.

The Town of Alford bas some of the finest freshwater fisheries in the commonwealth. This proposal to provide town-scale comprehensive

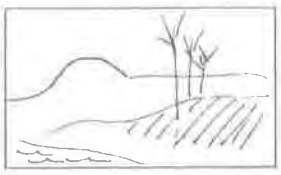
bridge and culvert inventories. replacement project prioritizations, and conceptual designs for replacing priority) structures that demonstrate Stream Simulation Design is the direct hands-on assistance needed to proceed with implementation.

We have partnered with HVA in the past and they have a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region.

We look forward to the opportunity that this project presents for regional conservation and HVA has our full support for this endeavor.

Sincerely,

Henry A. Flint
Chairman
Town of Alford
Conservation Commission



Alford Land Trust

September 27, 2018

Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

I am writing this letter in support for the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. The Alford Land Trust heartily endorses this application.

This grant would fund a crucial step in upgrading road-stream crossings that currently act as barriers to the movement of aquatic organisms, restricting access to upstream pathways for coldwater species that are negatively affected by climate change, such as native brook trout. In addition to restoring habitat connectivity, these upgrades would reduce the risk of culvert failure and road closures, a risk made more urgent given the increased frequency and intensity of severe storm events in this region. HVA's proposal to develop town-scale Road-Stream Crossing Management Plans for five communities in the Berkshires will be extremely beneficial to the conservation goals that we endorse.

The Town of Alford bas some of the finest freshwater fisheries in the commonwealth. This proposal to provide town-scale comprehensive

bridge and culvert inventories. replacement project prioritizations, and conceptual designs for replacing priority) structures that demonstrate Stream Simulation Design is the direct hands-on assistance needed to proceed with implementation.

We have partnered with HVA in the past and they have a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region.

We look forward to the opportunity that this project presents for regional conservation and HVA has our full support for this endeavor.

Sincerely,

Henry A. Flint
President
Alford Land Trust

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

September 21, 2018

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

I am writing this letter in support for the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. The Alford Conservation Commission heartily endorses this application.

The Berkshire Natural Resources Council, Inc, (BNRC) supports the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. BNRC works to protect the natural beauty and ecological integrity of the Berkshires for public benefit and enjoyment. This project will provide town-scale comprehensive bridge and culvert inventories, replacement project prioritizations, and conceptual designs for replacing priority structures.

HVA has a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region. We look forward to the opportunity that this project presents for regional conservation, and HVA has our full support for this endeavor.

Sincerely,

Narain Schroeder
Director of Land Conservation
Berkshire Natural Resources Council, Inc.

BERKSHIRE
Natural Resources Council
THE LANDKEEPERS

Board of Directors

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Tim Crane, Chairman
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John Mancia
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Ron Shaw
Syd Smithers
Brian Tobin
Elena Traister

George Darey,
Donald B. Miller Honorary
Life Director

20 Bank Row
Pittsfield MA 01201
413 499 0596
bnrc.org

BERKSHIRE REGIONAL PLANNING COMMISSION

1 FENN STREET, SUITE 201, PITTSFIELD, MASSACHUSETTS 01201

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www.berkshireplanning.org

KYLE HANLON, Chair
SHEILA IRVIN, Vice-Chair
MARIE RAFTERY, Clerk
JOHN DUVAL, Treasurer

THOMAS MATUSZKO, A.I.C.P.
Executive Director

September 25, 2018

Mass. DEP, Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

Dear Mr. Potter:

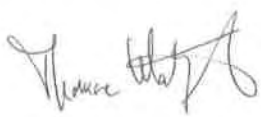
The Berkshire Regional Planning Commission (BRPC) strongly supports the Housatonic Valley Association's (HVA) grant application to partner with five Berkshire County towns to aid them in assessing road stream crossings and prioritizing a key structure that should be upgraded for improved habitat continuity and reduced flood risk. As has been cited in *Sustainable Berkshires*, the regional plan adopted in 2012, as well as the *Berkshire County Hazard Mitigation Plan*, upgrading road crossings provide multiple environmental and public safety benefits, a few of which include:

- Restoring aquatic organism connectivity;
- Improving upstream pathways for refuge for cold water species, which is all the more important to provide climate change resiliency for our remaining native trout populations; and
- Reducing the risk of culvert failure and road closures due to flooding, all the more important due to the increase in the number and intensity of severe storm events in the region.

Most recently the issue of failing, undersized and deteriorating road crossings has become a serious transportation issue in the Berkshires. HVA's proposal to provide a bridge and culvert inventory and risk-of-failure modeling will be extremely beneficial to the towns. The proposal to provide a conceptual engineering design, cost estimate and implementation strategy for the highest priority crossing is the direct, hands-on assistance needed to proceed with implementation.

HVA has a proven record of successfully partnering and implementing water quality projects across the region, including several with BRPC. We respectfully request that you look with favor upon HVA's application.

Sincerely,



Thomas Matuszko, A.I.C.P.
Executive Director

Housatonic Heritage

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

September 18, 2018

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

On behalf of the Board of Trustees, Upper Housatonic Valley National Heritage Area, I am pleased to support the application by the Housatonic Valley Association (HVA) for a grant from the Housatonic River Natural Resource Damages Fund.

HVA is proposing to work with five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge - all of which are planning culvert replacement projects. The proposed scope of work includes town-scale comprehensive bridge and culvert inventories, replacement project prioritizations, and conceptual designs for replacing priority structures.

We understand the critical need to improve road-stream crossings that currently act as barriers to the movement of aquatic organisms and restrict upstream movement for native fish. Beyond restoring habitat connectivity, these upgrades would also serve to reduce the risk of culvert failure and road closures.

Housatonic Heritage is a partnership program of the National Park Service, with a mission to preserve and celebrate the region's history, culture and natural resources. We firmly believe that HVA's proposal to develop town-scale Road-Stream Crossing Management Plans for these five communities in Berkshire County is extremely beneficial to our natural resource conservation efforts, and fits our preservation goals perfectly.

We've worked with the Housatonic Valley Association on numerous programs over the past 15 years, and can attest to their ability to successfully collaborate with the many partner organizations (and municipalities) in implementing water quality projects such as described herein. We fully support HVA in this endeavor.

Warmest regards,

Dan T. Bolognani
Executive Director

860.435.9505 /
dbolognani@housatonicheritage.org

Tracy Brown
Northeastern Restoration Coordinator

September 18, 2018

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

Trout Unlimited (TU) fully supports the Housatonic Valley Association's (HVA) Planning for Fish Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills Project which will support the development of town-scale Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond and West Stockbridge. These towns encompass the Massachusetts portion of the Green and Williams River watersheds, each of which are home to high-quality Eastern Brook Trout habitat.

The Berkshire Hills Project is a continuation of HVA's work in northwestern CT. HVA has developed an approach for integrating barrier mitigation priorities into local highway infrastructure and natural hazard mitigation planning throughout the Housatonic River watershed. This approach identifies priority replacement structures based on conservation value, flood risk and maintenance need, as well as providing an opportunity to expand the dialog with highway managers about the connect between flood risk and habitat issues. Ultimately, the results of HVAs work will be a new tool that Towns can use to prioritize and secure financing for road-stream crossing replacement projects that will benefit town infrastructure and our important cold-water fisheries.

HVA is a leading advocate for natural resource protection in the Housatonic Valley with a long and successful track record of establishing successful partnerships to ensure both land and water protection. They are respected throughout the communities they serve and have proven time and time again that they are well positioned to work with local resource groups and municipalities. TU is working on similar projects in NY and elsewhere throughout New England. TU supports HVA's collaborative strategy and looks forward to working with HVA and their partners to continue to improve community and ecosystem resiliency in CT and MA.

Thank you for consideration of this beneficial proposal.

Warm Regards,

Tracy Brown
Phone: (413) 854-4100
Email: TBrown@tu.org

Taconic Chapter of Trout Unlimited
Chapter #228

TROUT UNLIMITED

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
One Winter Street, 6th Floor
Boston, MA 02108
Attn: Thomas M. Potter

September 18, 2018

Re: Planning for Fish-Friendly and Flood Resilient Road-Stream Crossings in the Berkshire Hills

Dear Mr. Potter,

The Taconic Chapter of Trout Unlimited supports the Housatonic Valley Association's (HVA) application for a grant from the Housatonic River Natural Resource Damages Fund to create Road-Stream Crossing Management Plans for five communities in the Berkshire Hills of Massachusetts: Alford, Egremont, Great Barrington, Richmond, and West Stockbridge. As our mission states we are activists for cold water fisheries. This project will provide town-scale comprehensive bridge and culvert inventories, replacement project prioritizations, and conceptual designs for replacing priority structures.

This grant would assist these communities in improving their road-stream crossings that currently act as barriers to the movement of aquatic organisms, restricting access to upstream pathways for coldwater species such as native brook trout. In addition to restoring habitat connectivity, these upgrades would reduce the risk of culvert failure and road closures, a risk made more urgent given the increased frequency and intensity of severe storm events in this region. HVA's proposal to develop town-scale Road-Stream Crossing Management Plans for five communities in the Berkshires will be extremely beneficial to the conservation goals that we endorse. The Taconic Chapter of Trout Unlimited will assist the HVA with prioritization, particularly for cold-water habitat conservation.

HVA has a proven record of successfully collaborating with towns and partner organizations and implementing water quality projects across the region. We look forward to the opportunity that this project presents for regional conservation, and HVA has our full support for this endeavor.

Sincerely,

Henry Sweren

Henry Sweren
President
Taconic Chapter of Trout Unlimited

10 PUBLIC COMMENTS ON DRAFT ROUND 4 RP/SEA

Public comments on the Draft Round 4 RP/SEA were accepted via letter and email during the 30-day public comment period, which began on April 16, 2019, and closed at 5:00 PM on May 15, 2019. Public comments received during the public comment period are included in Appendix D of this document.

No written public comments were submitted during the public meeting held during the 30-day public comment period at the Lenox Public Library in Lenox, Massachusetts, on May 1, 2019. Meeting notes from the public meeting are included in Appendix E of this document.

Summaries of the written public comments received by the MA SubCouncil during the 30-day public comment period, and the MA SubCouncil's responses to these comments, are provided below.

10.1 Public Comments and MA SubCouncil Responses

Four written public comments were received during the 30-day public comment period for the Draft Round 4 RP/SEA. Three written public comments were received for Restoration Project 401: Japanese Knotweed Control Along the Housatonic River, which was not selected for funding, and one written public comment was received for Restoration Project 403: Land Acquisition Project # 1, which was selected for funding.

The three written public comments for Restoration Project 401 are paraphrased in Section 10.1.1 and are followed by the MA SubCouncil's response to these public comments. The written public comments received for Restoration Project 401 are provided in their entirety in Appendix D.

The written public comment for Restoration Project 403 is paraphrased in Section 10.1.2 and is followed by the MA SubCouncil's response. The written public comment received for Restoration Project 403 is not provided in this document in order to maintain confidentiality during the land acquisition process[22].

10.1.1 Restoration Project 401: Japanese Knotweed Control Along the Housatonic River

Three written public comments were received in support of Restoration Project 401, which was not selected for funding based on the results of the Evaluation Criteria scoring and MA SubCouncil review, reflecting concerns including the long-term sustainability of

[22] As described in this document, identifying information for land acquisition project applications is withheld as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after Round 4 NRD funding has been awarded and funded land acquisition projects have closed.

this proposed project and constraints associated with availability of Round 4 NRD funds (Section 5.2.1.2).

10.1.1.1 Public Comment from BNRC

A public comment received from BNRC (dated May 15, 2019) commented that the applicant for this project, Native Habitat Restoration LLC, is working with multiple towns in southern Berkshire County to address the presence of Japanese knotweed and that "there is widespread support for the initiative…". This public comment encouraged selecting Restoration Project 401 for funding.

10.1.1.2 Public Comment from Housatonic River Commission

A public comment received from the Housatonic River Commission (dated May 15, 2019) commented that Japanese knotweed poses a threat to the banks of the Housatonic River; that the northernmost reach of the Housatonic River in Connecticut is under consideration for designation under the National Wild and Scenic Rivers Act; and that continued spread of Japanese knotweed could threaten the environment along the river. This public comment encouraged selecting Restoration Project 401 for funding.

10.1.1.3 Public Comment from NWCT Knotweed Initiative

A public comment received from the Knotweed Initiative of the "Wild and Scenic" Housatonic for the Housatonic River Commission in Connecticut (dated May 15, 2019) commented that the 42 miles of the Housatonic River in Connecticut downstream from the border with Massachusetts is expected to be designated as Wild and Scenic by the National Park Service and that Japanese knotweed poses a threat to native flora. This public comment noted previous efforts to identify and control Japanese knotweed along the Housatonic River and included two figures depicting information along the approximately 42-mile reach of the Housatonic River between the Massachusetts border and New Milford, Connecticut. These figures include 1) locations where Japanese knotweed was identified in 2018 and 2) permanently protected lands adjacent to the river and a 1.5-mile buffer along both sides of the river. A focus of this public comment is that control of Japanese knotweed along the Housatonic River in Massachusetts will benefit control of Japanese knotweed along the Housatonic River in Connecticut.

10.1.1.4 MA SubCouncil Responses to Public Comments

The MA SubCouncil's review of this proposed project is presented in Section 5.2.1 and notes that this proposed project may benefit injured natural resources and services through enhancements to riparian habitat. However, the review also notes that the long-term cost-benefit ratio of this proposed project may be low based on factors including the anticipated project costs and uncertainty regarding the long-term potential for maintaining the anticipated initial benefits achieved through implementation of this proposed project.

While the objectives, location, and spatial extents of this proposed project were appreciated by the MA SubCouncil, reviewers identified that this proposed project could

require additional funding for long-term maintenance of initial benefits. In particular, the reviewers noted that specific potential contingency actions and adaptive management measures, as may be needed if treatments do not achieve or maintain target values, were not addressed in the project application.

The MA SubCouncil appreciates the investment in knotweed control being made downstream in Connecticut as well as the importance of taking a landscape-scale approach to knotweed control along the Housatonic River corridor. However, the MA SubCouncil has several concerns about this project and its likelihood for long-term success given that this is the last round of natural resource settlement funding available from the MA SubCouncil for the Housatonic River in Massachusetts:

The MA SubCouncil has observed aggressive return of Japanese knotweed in Housatonic River floodplain locations following other control efforts. Native Habitat Restoration, LLC stated in its project application that it is committed to applying for future grants to continue knotweed control after the first three years of work proposed in this project application; however, there is no assurance that these funds will be secured and none of the landowners have firmly committed in writing to fund Japanese knotweed control measures on their properties over the long-term. Japanese knotweed has the ability to reproduce from small plant fragments that can be carried downstream, and new populations can be expected to continue to be introduced year after year. The MA SubCouncil understands that ongoing surveys for new populations and ongoing treatment of new and existing populations may need to be conducted in perpetuity to keep populations from establishing / reestablishing. Populations of Japanese knotweed can easily reestablish within short timeframes as soon as control measures are discontinued.

As a result of these considerations, the MA SubCouncil did not change its recommendation that NRD funds not be allocated for this proposed project.

10.1.2 Restoration Project 403: Land Acquisition Project #1

One written public comment was received addressing funding needs for Restoration Project 403. Restoration Project 403 was selected in the Draft Round 4 RP/SEA for funding as part of the Preferred Alternative.

10.1.2.1 Public Comment from Applicant

One written public comment was received from the applicant for Restoration Project 403 that revised the requested NRD funding for this land acquisition project. This written public comment identified that the negotiated land acquisition agreement with the landowner was $20,000 less than the value stated in the project application and that the amount of funding requested from MA SubCouncil was therefore reduced by $20,000.

10.1.2.2 MA SubCouncil Response to Public Comments

In consideration of the reduction in the negotiated value of the land acquisition agreement, the MA SubCouncil reduced the recommendation NRD funding allocated to

Restoration Project 403 from $171,080 to $151,080. This change is noted in preceding sections of this document.

11 LITERATURE CITED

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[HRR] Housatonic River Restoration, Inc. 1999. Revised 2003. The Housatonic River Restoration Plan. Online at: https://semspub.epa.gov/work/01/211794.pdf.

Roy F. Weston, Inc. 1998. Upper Reach-Housatonic River Ecological Risk Assessment. Prepared under EPA Contract No. 68-W5-0009. Roy F. Weston, Inc., West Chester, PA. Online at: https://semspub.epa.gov/work/01/5775.pdf.

Stantec. 2008. Round 2 Land Protection Summary of Housatonic River Natural Resource Damages Restoration Process. Prepared for the Massachusetts SubCouncil of the Housatonic River Natural Resource Trustees. December 2, 2008. Online at: http://www.ma-housatonicrestoration.org/library.htm.

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Woodlot. 2002b. Ecological Characterization of the Housatonic River Downstream of Woods Pond. Prepared for the U.S. Environmental Protection Agency. September. Online at: https://semspub.epa.gov/work/01/508651.pdf.

[Woodlot and IEc] Woodlot Alternatives, Inc. and Industrial Economics, Inc. 2005a. Restoration Planning Strategy. Prepared for the Massachusetts SubCouncil of the Housatonic River Natural Resource Trustees. February 18, 2005. Online at: http://www.ma-housatonicrestoration.org/library.htm.

Woodlot and IEc. 2005b. Restoration Project Selection Procedure (RPSP). Prepared for the Massachusetts SubCouncil of the Housatonic River Natural Resource Trustees. June 30, 2005. Online at: http://www.ma-housatonicrestoration.org/library.htm.

Appendix A -

Public Libraries Where Documents Can Be Accessed

Great Barrington Mason Library
231 Main Street
Great Barrington, MA 01230-1604
(413) 528-2403

Lee Library
100 Main Street
Lee, MA 01238
(413) 243-0385

The Lenox Library
18 Main Street
Lenox, MA 01240
(413) 637-0197

Berkshire Athenaeum
One Wendell Avenue
Pittsfield, MA 01201-6385
(413) 499-9480

Bushnell-Sage Library
48 Main Street
Sheffield, MA 01257-0487
(413) 229-7004

Stockbridge Library
46 Main Street
P.O. Box 119
Stockbridge, MA 01262-0119
(413) 298-5501

Appendix B -

Newspapers, Radio, and Television Stations Used For Public Announcements

Newspapers used for public outreach include:

- Athol Daily News, Athol, MA
- Berkshire Eagle, Pittsfield, MA
- Berkshire Record, Great Barrington, MA
- Country Journal, Palmer, MA
- Litchfield County Times, New Milford, CT
- Shoppers Guide, Great Barrington, MA
- The Berkshire Beacon, Lenox, MA
- The Lakeville Journal, Lakeville, CT
- The Pittsfield Gazette, Pittsfield, MA
- The Republican, Springfield, MA

Radio stations used for public outreach include:

- WBEC 1420 AM, Pittsfield, MA
- WAMC, Albany, NY

Television stations used for public outreach include:

- WWLP-22 News, Springfield, MA
- WRGB, Albany, NY

Appendix C -

Consensus-Based Evaluation Summary Memos

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Japanese Knotweed Control Along the Housatonic River (Application No. 401)

Consensus-Based Score: 186

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- **Criterion A3 (Sustainable Benefits):** Reviewers discussed that the application stated that some of the areas identified for controls are new areas of Japanese knotweed (*Polygonum cuspidatum*) establishment and that addressing new areas of establishment can represent a more efficient and sustainable approach to invasive plant species control. One reviewer stated that there has been some success in control of this species relative to attempts at control of some other invasive plant species. Another reviewer expressed significant doubts that the proposed project "will clearly result in long-term self-sustaining… benefits", noting that long-term monitoring and maintenance could be required to maintain the benefits of the proposed project. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an average score for this criterion that was generally representative of the reviewers' evaluation for this criterion.
- **Criterion A5 (Human Health & Safety):** One reviewer noted that a Health and Safety Plan should be required if the application is selected for funding. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an average score for this criterion that was generally representative of the reviewers' evaluation for this criterion.
- **Criterion A6 (Benefits to Multiple Restoration Categories)**: Reviewers discussed the four Restoration Priority Categories. One reviewer stated that this application does not explicitly address the Restoration Priority Categories and another review noted that the application does briefly address this criterion. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A7 (Enhancement of Remediation / Response Actions):** One reviewer noted that the proposed project is located along the "Rest of River" reach and, if the application is selected for funding, related considerations would be necessary, including confirming that the proposed project actions would not be negatively impacted by future remediation / response actions. Another reviewer changed their score for this criterion from High to Medium based on clarification that this criterion focuses specifically on potential synergies with the remediation / response actions (vs other compensatory restoration actions throughout the watershed). Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an average score for this criterion that was generally representative of the reviewers' evaluation for this criterion.

- **Criterion B1 (Technical/Technological Feasibility)**: One reviewer stated that the application did not address the technical / technological feasibility of the approach and scored the application Low (indicating: "applicant does not demonstrate technical/technological feasibility of project"). Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion B3 (Potential for Adverse Environmental Impacts)**: One reviewer stated that they didn't have enough information from the application to address the potential for adverse environmental impacts. Other reviewers described knotweed treatment approaches previously used by this applicant as a part of other NRD-funded projects. One reviewer raised their score from 0 to 6 based on this information. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion B5 (Contingency Actions):** Reviewers discussed that potential contingency actions weren't addressed in detail in the application. One reviewer summarized that the application states "If monitoring indicates that the treatment is not meeting the target values, the treatment protocol will be adjusted as necessary". One reviewer noted that the application doesn't address what would happen if target values are not met and additional funding is needed to meet them. Reviewers noted that invasive plant species control efforts can require long-term monitoring and maintenance to maintain benefits achieved through initial control actions. Two reviewers changed their score for this criterion from High to Medium (10 to 6) based on this discussion. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion C1 (Relationship of Expected Costs to Expected Benefits)**: One reviewer stated that they saw important benefits related to the location and spatial extents of the proposed project area, which encompasses a 2.9-mile reach of the Housatonic River and involves multiple communities and stakeholders. Another review noted that it was not clear the extent to which these benefits could be maintained over time following project implementation (e.g., if Japanese knotweed re-established in the project reach following completion of the proposed project). Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion C3 (Budget Justification and Understanding):** One reviewer stated that the budget lacked detail and that the proposed project seemed expensive relative to the cost of other invasive species control projects. Another reviewer disagreed and stated that the level of detail was appropriate and noted that control of this species can be labor-intensive and expensive. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D5 (Complementary with Community Goals):** Reviewers discussed that, while the proposed project may support National Park Service goals and other identified community goals, this criterion ("Complementary with Community Goals") is not addressed in detail in the application. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

Evaluation Scoring Summary

Project Name: **Japanese Knotweed Control along the Housatonic River (Application No. 401)**

Project Score: **186**

CATEGORY & CRITERIA	EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	9	9	15	9	15	9	15	15	**12**
2. Location of Project	15	15	15	15	15	15	15	15	**15**
3. Sustainable Benefits	0	0	9	9	0	9	0	9	**5**
4. Magnitude of Ecological Benefits	0	9	15	9	9	9	9	9	**9**
5. Human Health and Safety	6	6	10	0	10	10	10	6	**7**
6. Benefits to Multiple Restoration Categories	6	10	10	0	6	10	6	10	**7**
7. Enhancement of Remediation/Response Actions	0	0	3	3	3	0	0	0	**1**
Subtotal (max=85)	**36**	**49**	**77**	**45**	**58**	**62**	**55**	**64**	**56**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	9	9	15	0	9	15	15	15	**11**
2. Technical Capacity of Applicant and Project Team	9	15	15	15	9	15	15	15	**14**
3. Potential for Adverse Environmental Impacts	6	10	10	6	10	6	10	6	**8**
4. Measurable Results	10	6	10	6	10	10	10	10	**9**
5. Contingency Actions	6	6	6	0	0	6	6	6	**5**
6. Administrative Capacity of Applicant and Project Team	3	3	5	5	3	5	5	5	**4**
Subtotal (max=65)	**43**	**49**	**61**	**32**	**41**	**57**	**61**	**57**	**50**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	0	9	15	0	0	9	9	9	**6**
2. Implementation-Oriented	9	15	15	15	9	15	15	15	**14**
3. Budget Justification and Understanding	0	9	9	9	9	9	15	9	**9**
4. Leveraging of Additional Resources	0	3	3	3	0	0	3	3	**2**
5. Coordination and Integration	3	5	5	3	5	5	5	5	**5**
Subtotal (max=60)	**12**	**41**	**47**	**30**	**23**	**38**	**47**	**41**	**35**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	9	15	15	15	9	15	15	9	**13**
2. Fostering Future Restoration and Stewardship	9	9	9	9	9	9	15	9	**10**
3. Community Involvement	0	0	0	0	9	0	9	9	**3**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	10	10	10	**10**
5. Complementary with Community Goals	6	0	6	0	6	6	10	6	**5**
6. Public Outreach	0	0	0	0	0	3	3	3	**1**
7. Diverse Partnerships	0	3	5	0	3	5	3	3	**3**
Subtotal (max=75)	**34**	**37**	**45**	**34**	**46**	**48**	**65**	**49**	**45**
Total Score (max=285)	**125**	**176**	**230**	**141**	**168**	**205**	**228**	**211**	**186**

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Churchill Brook Culvert Replacement (Application No. 402)

Consensus-Based Score: 242

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- **Criterion A6 (Benefits to Multiple Restoration Categories)**: Reviewers discussed the four Restoration Priority Categories, and one reviewer stated that this application does not explicitly address the Restoration Priority Categories. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A7 (Enhancement of Remediation / Response Actions):** One reviewer stated that, because this proposed project is located upstream from The Site (upstream from the identified GE contamination and anticipated remediation / response actions), it would not enhance remediation / response actions. Another review stated that Churchill Brook is a tributary to the Housatonic River after flowing through Onata Lake and expressed that there is a limited opportunity for this proposed project to results in synergistic benefits (e.g., improved water quality) with completed, ongoing or planned remediation / response actions. Two reviewers changed scores from High to Medium based on clarification that this criterion focuses specifically on potential synergies with the remediation / response actions (vs other compensatory restoration actions within the Massachusetts portion of the Housatonic River watershed). Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion C1 (Relationship of Expected Costs to Expected Benefits)**: One reviewer stated that this proposed project is very expensive and would prefer that the City or State provide a higher percentage of project funding. The same reviewer also noted that the budget for project management was high. Another reviewer concurred that this is an expensive project, but they noted that they were glad to see the contribution of funding by other entities. Another reviewer stated that requested NRD funds represent less than a third of the estimated cost. Another reviewer noted that that Churchill Brook has been identified as one of the most important trout streams in the watershed and that replacement of this stream crossing has been identified as a priority by the Massachusetts Division of Fisheries and Wildlife (DFW). Based on this discussion, one reviewer changed score from Low to Medium. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D2 (Fostering Future Restoration and Stewardship):** One reviewer noted that this criterion wasn't specifically addressed in the application. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

- **Criterion D3 (Community Involvement):** One reviewer noted that community involvement is described in the application as including local volunteers and organizations. Another reviewer stated that the description lacked specifics, noting that "involve local volunteers" is easy to say but it isn't backed up. Another reviewer noted that this proposed project is a continuation of a previous NRD-funded project and the applicant may be assuming that the reviewers are familiar with the various organizations referenced in the application. One reviewer changed their score for this criterion from Low to Medium based on this discussion. One reviewer changed their score for this criterion from Low to Medium based on having missed information during their initial review of the application. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D5 (Complementary with Community Goals):** Reviewers discussed that this criterion is not addressed in detail in the application. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D6 (Public Outreach):** One reviewer noted that the proposed project does include a volunteer component but that the application does not specifically address a public outreach component. One reviewer changed their score for this criterion from High to Medium, and another reviewer changed their score for this criterion from a Low to a Medium, based on misunderstanding in their initial review of the application. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

Evaluation Scoring Summary

Project Name: Churchill Brook Culvert Restoration (Application No. 402)

Project Score: 242

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	15	15	15	15	15	15	15	15	**15**
2. Location of Project	15	15	15	15	15	15	15	15	**15**
3. Sustainable Benefits	9	15	9	15	15	9	15	9	**12**
4. Magnitude of Ecological Benefits	15	15	9	15	15	15	15	15	**14**
5. Human Health and Safety	10	10	6	10	10	10	10	10	**10**
6. Benefits to Multiple Restoration Categories	10	10	6	0	10	10	6	10	**8**
7. Enhancement of Remediation/Response Actions	3	0	3	3	5	0	0	0	**2**
Subtotal (max=85)	**77**	**80**	**63**	**73**	**85**	**74**	**76**	**74**	**75**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	15	15	15	9	15	15	15	15	**14**
2. Technical Capacity of Applicant and Project Team	15	15	15	15	15	15	9	15	**14**
3. Potential for Adverse Environmental Impacts	10	10	10	10	10	6	10	10	**10**
4. Measurable Results	10	10	6	6	10	10	10	10	**9**
5. Contingency Actions	10	10	10	10	6	10	10	10	**10**
6. Administrative Capacity of Applicant and Project Team	5	3	5	5	5	3	3	3	**4**
Subtotal (max=65)	**65**	**63**	**61**	**55**	**61**	**59**	**57**	**63**	**61**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	15	15	9	15	9	9	9	15	**12**
2. Implementation-Oriented	15	9	15	9	15	15	15	15	**14**
3. Budget Justification and Understanding	15	9	9	9	9	9	15	9	**11**
4. Leveraging of Additional Resources	10	10	10	10	10	10	10	10	**10**
5. Coordination and Integration	5	5	5	3	5	5	5	5	**5**
Subtotal (max=60)	**60**	**48**	**48**	**46**	**48**	**48**	**54**	**54**	**51**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	15	15	9	9	9	9	9	9	**11**
2. Fostering Future Restoration and Stewardship	9	15	9	9	0	9	15	9	**9**
3. Community Involvement	15	9	9	9	9	9	15	9	**11**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	6	10	10	**10**
5. Complementary with Community Goals	10	10	10	0	6	10	10	6	**8**
6. Public Outreach	3	3	3	3	0	3	5	3	**3**
7. Diverse Partnerships	5	5	5	3	5	5	5	5	**5**
Subtotal (max=75)	**67**	**67**	**55**	**43**	**39**	**51**	**69**	**51**	**55**
Total Score (max=285)	**269**	**258**	**227**	**217**	**233**	**232**	**256**	**242**	**242**

EVALUATION SUMMARY

Project Name: Land Acquisition Project #1 (Application No. 403)
Consensus-Based Score: 222

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- PLACEHOLDER –

[In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for this application is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and funded land protection projects have closed.]

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Evaluation Scoring Summary

Project Name: Land Acquisition Project #1 (Application No. 403)

Project Score: 222

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	9	9	9	15	9	15	15	15	**12**
2. Location of Project	15	9	9	15	15	15	15	15	**14**
3. Sustainable Benefits	9	15	9	15	15	9	15	9	**12**
4. Magnitude of Ecological Benefits	15	9	9	15	9	15	15	15	**13**
5. Human Health and Safety	10	10	10	10	10	10	10	10	**10**
6. Benefits to Multiple Restoration Categories	10	6	6	0	6	10	10	10	**7**
7. Enhancement of Remediation/Response Actions	0	0	0	3	3	0	0	0	**1**
Subtotal (max=85)	**68**	**58**	**52**	**73**	**67**	**74**	**80**	**74**	**68**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	15	15	9	15	15	15	15	15	**14**
2. Technical Capacity of Applicant and Project Team	15	15	9	15	15	15	15	15	**14**
3. Potential for Adverse Environmental Impacts	10	10	10	10	10	10	10	10	**10**
4. Measurable Results	10	6	6	10	10	10	10	10	**9**
5. Contingency Actions	10	10	10	10	10	10	10	10	**10**
6. Administrative Capacity of Applicant and Project Team	5	5	5	5	5	5	5	5	**5**
Subtotal (max=65)	**65**	**61**	**49**	**65**	**65**	**65**	**65**	**65**	**63**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	15	9	9	15	15	15	9	9	**12**
2. Implementation-Oriented	15	9	15	15	15	15	15	15	**14**
3. Budget Justification and Understanding	15	9	15	15	15	15	15	15	**14**
4. Leveraging of Additional Resources	3	6	3	3	3	3	3	3	**3**
5. Coordination and Integration	5	3	5	3	5	5	5	5	**5**
Subtotal (max=60)	**53**	**36**	**47**	**51**	**53**	**53**	**47**	**47**	**48**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	9	0	9	0	9	9	15	9	**8**
2. Fostering Future Restoration and Stewardship	9	0	9	9	9	9	15	15	**9**
3. Community Involvement	0	0	9	0	0	9	9	0	**3**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	10	10	10	**10**
5. Complementary with Community Goals	10	10	6	6	10	6	10	10	**9**
6. Public Outreach	3	0	3	0	0	3	5	5	**2**
7. Diverse Partnerships	3	0	3	3	0	0	3	0	**2**
Subtotal (max=75)	**44**	**20**	**49**	**28**	**38**	**46**	**67**	**49**	**43**
Total Score (max=285)	**230**	**175**	**197**	**217**	**223**	**238**	**259**	**235**	**222**

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Land Acquisition Project #2 (Application No. 404)

Consensus-Based Score: 237

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- PLACEHOLDER –

[In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for this application is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and funded land protection projects have closed.]

Evaluation Scoring Summary

Project Name: Land Acquisition Project #2 (Application No. 404)

Project Score: 237

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	9	15	15	15	9	15	15	15	**14**
2. Location of Project	15	15	15	9	15	15	15	15	**14**
3. Sustainable Benefits	9	15	9	15	15	15	15	15	**14**
4. Magnitude of Ecological Benefits	9	15	9	15	15	15	9	15	**13**
5. Human Health and Safety	10	10	10	10	10	10	10	10	**10**
6. Benefits to Multiple Restoration Categories	10	6	10	0	10	10	10	10	**8**
7. Enhancement of Remediation/Response Actions	0	0	3	3	3	0	0	0	**1**
Subtotal (max=85)	**62**	**76**	**71**	**67**	**77**	**80**	**74**	**80**	**73**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	15	15	15	15	15	15	15	15	**15**
2. Technical Capacity of Applicant and Project Team	15	15	15	15	15	15	15	15	**15**
3. Potential for Adverse Environmental Impacts	10	10	10	10	10	10	10	10	**10**
4. Measurable Results	10	6	6	10	10	10	10	10	**9**
5. Contingency Actions	6	6	10	6	10	10	10	10	**9**
6. Administrative Capacity of Applicant and Project Team	5	5	5	5	5	5	5	5	**5**
Subtotal (max=65)	**61**	**57**	**61**	**61**	**65**	**65**	**65**	**65**	**63**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	9	15	15	15	9	9	9	15	**12**
2. Implementation-Oriented	15	15	15	15	15	15	15	15	**15**
3. Budget Justification and Understanding	15	9	15	15	9	9	15	9	**12**
4. Leveraging of Additional Resources	6	6	6	6	6	6	6	6	**6**
5. Coordination and Integration	5	5	5	5	5	5	5	5	**5**
Subtotal (max=60)	**50**	**50**	**56**	**56**	**44**	**44**	**50**	**50**	**50**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	15	15	9	15	15	15	15	15	**14**
2. Fostering Future Restoration and Stewardship	9	9	9	9	15	9	9	9	**10**
3. Community Involvement	0	9	0	0	0	9	9	0	**3**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	10	10	10	**10**
5. Complementary with Community Goals	10	6	6	10	10	6	10	6	**8**
6. Public Outreach	5	3	3	0	3	3	5	3	**3**
7. Diverse Partnerships	0	3	5	3	0	0	3	3	**2**
Subtotal (max=75)	**49**	**55**	**42**	**47**	**53**	**52**	**61**	**46**	**51**
Total Score (max=285)	**222**	**238**	**230**	**231**	**239**	**241**	**250**	**241**	**237**

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Calcareous Fen Restoration (Application No. 405)

Consensus-Based Score: 220

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- **Criterion A4 (Magnitude of Ecological Benefits)**: Several reviewers noted that the proposed project appears to offer a thoughtful, holistic approach to long-term ecosystem management, providing significant potential value. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion C5 (Coordination and Integration)**: One reviewer noted that this proposed project appears to have evolved from, and/or relate to, other NRD-funded studies previously conducted by NHESP. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D1 (Enhancement of Public's Relationship with Natural Resources)**: One reviewer noted that the proposed project is not highly accessible to the public and described struggling with evaluating the value of the proposed project for this reason. One reviewer stated that, even though the public may not have direct access to these sensitive habitats, the proposed project may increase aesthetic values. Other reviewers noted that direct access may not always be necessary for enhancement of the public's relationship with natural resources. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D2 (Fostering Future Restoration and Stewardship):** One review reviewer noted that bog turtle (*Glyptemys muhlenbergii*) monitoring may help foster future stewardship and subsequently changed their score for this criterion from Low to Medium. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D5 (Complementary with Community Goals):** Reviewers discussed that this application appears complementary with community goals related to, for example, the State Wildlife Action Plan, but that the application does not specifically address this criterion. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

Evaluation Scoring Summary

Project Name: Calcareous Fen Restoration (Application No. 405)

Project Score: 220

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	15	9	15	15	15	15	15	15	**14**
2. Location of Project	15	15	15	15	15	15	15	15	**15**
3. Sustainable Benefits	0	9	9	9	9	9	9	0	**7**
4. Magnitude of Ecological Benefits	15	9	15	15	15	15	15	15	**14**
5. Human Health and Safety	6	10	6	10	10	6	10	6	**8**
6. Benefits to Multiple Restoration Categories	10	10	10	10	10	10	10	10	**10**
7. Enhancement of Remediation/Response Actions	0	0	5	5	5	0	0	0	**2**
Subtotal (max=85)	**61**	**62**	**75**	**79**	**79**	**70**	**74**	**61**	**70**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	9	15	15	15	15	15	15	15	**14**
2. Technical Capacity of Applicant and Project Team	15	15	15	15	15	15	15	15	**15**
3. Potential for Adverse Environmental Impacts	6	10	10	10	10	6	10	6	**9**
4. Measurable Results	10	6	10	10	10	10	10	6	**9**
5. Contingency Actions	10	6	10	10	10	10	10	10	**10**
6. Administrative Capacity of Applicant and Project Team	5	5	5	5	5	5	5	5	**5**
Subtotal (max=65)	**55**	**57**	**65**	**65**	**65**	**61**	**65**	**57**	**61**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	15	9	15	15	15	9	15	9	**13**
2. Implementation-Oriented	15	9	15	15	15	15	15	15	**14**
3. Budget Justification and Understanding	9	15	15	15	15	15	15	9	**14**
4. Leveraging of Additional Resources	3	3	3	3	3	3	3	3	**3**
5. Coordination and Integration	5	5	5	5	5	3	5	5	**5**
Subtotal (max=60)	**47**	**41**	**53**	**53**	**53**	**45**	**53**	**41**	**48**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	9	0	15	0	15	15	0	9	**8**
2. Fostering Future Restoration and Stewardship	9	9	9	0	15	15	15	15	**11**
3. Community Involvement	0	0	0	0	9	0	0	0	**1**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	10	10	10	**10**
5. Complementary with Community Goals	10	6	6	0	6	6	10	6	**6**
6. Public Outreach	3	0	3	0	0	0	0	0	**1**
7. Diverse Partnerships	5	3	5	5	5	0	5	3	**4**
Subtotal (max=75)	**46**	**28**	**48**	**15**	**60**	**46**	**40**	**43**	**41**
Total Score (max=285)	**209**	**188**	**241**	**212**	**257**	**222**	**232**	**202**	**220**

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Land Acquisition Project #3 (Application No. 406)

Consensus-Based Score: 241

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- PLACEHOLDER –

[In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for this application is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and funded land protection projects have closed.]

Evaluation Scoring Summary

Project Name: Land Acquisition Project #3 (Application No. 406)

Project Score: 241

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	9	15	15	15	9	15	15	15	**14**
2. Location of Project	15	15	15	9	15	15	15	15	**14**
3. Sustainable Benefits	15	15	15	15	15	15	15	15	**15**
4. Magnitude of Ecological Benefits	15	15	15	15	15	15	9	15	**14**
5. Human Health and Safety	10	10	10	10	10	10	10	10	**10**
6. Benefits to Multiple Restoration Categories	10	10	10	10	10	10	10	10	**10**
7. Enhancement of Remediation/Response Actions	0	0	3	3	3	0	0	0	**1**
Subtotal (max=85)	**74**	**80**	**83**	**77**	**77**	**80**	**74**	**80**	**78**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	15	15	15	15	15	15	15	15	**15**
2. Technical Capacity of Applicant and Project Team	15	15	15	15	15	15	15	15	**15**
3. Potential for Adverse Environmental Impacts	10	10	10	10	10	10	10	10	**10**
4. Measurable Results	10	10	10	10	10	10	15	10	**11**
5. Contingency Actions	10	10	10	10	10	10	10	10	**10**
6. Administrative Capacity of Applicant and Project Team	5	5	5	10	5	5	5	5	**6**
Subtotal (max=65)	**65**	**65**	**65**	**70**	**65**	**65**	**70**	**65**	**66**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	15	15	15	15	15	15	15	15	**15**
2. Implementation-Oriented	15	15	15	15	15	15	15	15	**15**
3. Budget Justification and Understanding	15	15	15	15	15	15	15	15	**15**
4. Leveraging of Additional Resources	3	3	3	3	3	3	3	3	**3**
5. Coordination and Integration	5	5	5	5	5	3	5	5	**5**
Subtotal (max=60)	**53**	**53**	**53**	**53**	**53**	**51**	**53**	**53**	**53**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	15	15	15	15	15	15	15	15	**15**
2. Fostering Future Restoration and Stewardship	9	15	15	0	15	15	9	9	**11**
3. Community Involvement	0	0	0	0	0	0	0	0	**0**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	10	10	10	**10**
5. Complementary with Community Goals	10	0	0	0	10	6	10	6	**5**
6. Public Outreach	3	0	3	0	0	0	3	0	**1**
7. Diverse Partnerships	0	0	5	3	0	0	3	0	**1**
Subtotal (max=75)	**47**	**40**	**48**	**28**	**50**	**46**	**50**	**40**	**44**
Total Score (max=285)	**239**	**238**	**249**	**228**	**245**	**242**	**247**	**238**	**241**

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Alford Springs Culvert Improvement Project (Application No. 407)

Consensus-Based Score: 187

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- **Criterion A4 (Magnitude of Ecological Benefits)**: Reviewers noted that site-specific restoration benefits were not well described; reviewers described that anticipated benefits were addressed generally, in association with generally understood benefits of culvert replacement projects, but not in relation to the specific tributaries and related habitat. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A6 (Benefits to Multiple Restoration Categories)**: One reviewer stated that this application does not explicitly address the Restoration Priority Categories. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A7 (Enhancement of Remediation / Response Actions):** One reviewer changed their score for this criterion from High to Low based on clarification that this criterion focuses specifically on potential synergies with the remediation / response actions (vs other compensatory restoration actions within the Massachusetts portion of the Housatonic River watershed). Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion C1 (Relationship of Expected Costs to Expected Benefits)**: One reviewer discussed struggling with identifying the ecological benefit of this proposed project and that they had scored this application highly because of the low cost but struggled with the actual benefit of the proposed project. Another reviewer stated that the application did not satisfactorily describe the specific, expected benefits related to habitat restoration. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion C3 (Budget Justification and Understanding):** One reviewer stated that they felt that information needed to evaluate the budget was lacking from the application. Two other reviewers noted that the budget raised questions (e.g., what type of replacement culvert is assumed; is the identified contingency funding appropriate [i.e., it may be low]; are additional/different permits required?). Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D1 (Enhancement of Public's Relationship with Natural Resources)**: One reviewer stated that the proposed improvements do not appear necessary to support public access. Another reviewer noted that the road is the primary loop trail through the site and that vehicle access along this road

is needed to maintain ongoing habitat management. Reviewers noted that there are positive benefits associated with recreational access and habitat management access. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

- **Criterion D3 (Community Involvement):** One reviewer noted that the application referenced community involvement associated with the permitting process and reaching out to the Berkshire Environmental Action Team. Another reviewer stated that environmental permits are required, so public involvement on its own doesn't seem to meet the intent related to the Community Involvement criterion. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

Evaluation Scoring Summary

Project Name: Alford Springs Culvert Improvement Project (Application No. 407)

Project Score: 187

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	9	9	15	9	15	9	15	15	**12**
2. Location of Project	15	15	15	9	15	15	15	15	**14**
3. Sustainable Benefits	9	9	5	9	15	15	15	9	**11**
4. Magnitude of Ecological Benefits	0	9	5	9	15	15	9	9	**9**
5. Human Health and Safety	10	10	10	10	10	10	10	10	**10**
6. Benefits to Multiple Restoration Categories	6	6	6	0	10	10	10	10	**7**
7. Enhancement of Remediation/Response Actions	0	0	0	0	3	0	0	0	**0**
Subtotal (max=85)	**49**	**58**	**56**	**46**	**83**	**74**	**74**	**68**	**64**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	9	9	15	9	15	9	15	9	**11**
2. Technical Capacity of Applicant and Project Team	9	15	15	9	15	9	15	9	**12**
3. Potential for Adverse Environmental Impacts	10	10	10	10	10	6	10	10	**10**
4. Measurable Results	6	6	6	6	10	6	6	6	**7**
5. Contingency Actions	0	6	0	6	6	6	10	6	**5**
6. Administrative Capacity of Applicant and Project Team	3	5	5	10	5	5	5	3	**5**
Subtotal (max=65)	**37**	**51**	**51**	**50**	**61**	**41**	**61**	**43**	**49**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	0	9	9	9	9	9	15	9	**9**
2. Implementation-Oriented	15	15	15	15	15	15	15	15	**15**
3. Budget Justification and Understanding	9	9	9	0	15	9	15	9	**9**
4. Leveraging of Additional Resources	0	3	3	3	3	3	3	3	**3**
5. Coordination and Integration	3	3	3	3	3	3	5	3	**3**
Subtotal (max=60)	**27**	**39**	**39**	**30**	**45**	**39**	**53**	**39**	**39**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	0	9	15	9	9	15	15	9	**10**
2. Fostering Future Restoration and Stewardship	0	0	15	0	0	9	15	9	**6**
3. Community Involvement	0	0	9	0	0	0	0	0	**1**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	10	10	10	**10**
5. Complementary with Community Goals	6	0	6	0	10	0	10	6	**5**
6. Public Outreach	3	0	3	0	0	0	5	0	**1**
7. Diverse Partnerships	0	3	5	0	0	0	3	0	**1**
Subtotal (max=75)	**19**	**22**	**63**	**19**	**29**	**34**	**58**	**34**	**35**
Total Score (max=285)	**132**	**170**	**209**	**145**	**218**	**188**	**246**	**184**	**187**

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Housatonic River Watershed Education Programs (Application No. 408)

Consensus-Based Score: 253

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- **Criterion A1 (Natural Recovery Period)**: One reviewer noted that this application is very different from the others and, while noting that this criterion isn't well-oriented to this type of project, that they couldn't see how education could provide restoration benefits in advance of the natural recovery period. Other reviewers noted that some evaluation criteria are better suited for certain types of projects than others. Reviewers also noted that a component of the proposed project includes student involvement in hand-on restoration activities. Another reviewer noted that community engagement in restoration-related interests is essential and that education of young people is important for related involvement to transcend generations. This reviewer stated their observation that community involvement is led by an aging population and there is a need to engage younger people. Another reviewer noted that the restoration work being funded by this NRD program relies on the next generation to help perpetuate and sustain benefits into the future. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A4 (Magnitude of Ecological Benefits)**: Reviewers discussed that direct ecological benefits are hard to measure for education projects. Another reviewer noted that it is necessary to inform and engage the next generation in order to maintain and advance restoration and conservation initiatives and opportunities. One reviewer changed their score for this criterion from Low to Medium based on this discussion. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A7 (Enhancement of Remediation / Response Actions):** One reviewer noted that, while it is not addressed in the application, there may be an excellent opportunity to integrate information regarding the remediation / response actions and the restoration completed to-date with NRD funding into the educational components of the proposed project. Another reviewer stated they scored this a High because of the portion of the project located at Canoe Meadows. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion B1 (Technical / Technological Feasibility)**: One reviewer changed from Medium to High based on a review of the summary (Technical Feasibility) provided in the application.
- **Criterion B4 (Measurable Results):** One reviewer stated that it is easy to measure involvement but harder to measure related outcomes. Other reviewers pointed to the section of the application addressing of Monitoring and Evaluation (Task 5) and noted that substantial evaluation of outcomes is proposed. One reviewer changed their score for this criterion from Low to Medium based on this discussion. Unanimity among individual scores was not achieved in the course of the discussion, but

reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

- **Criterion C5 (Coordination and Integration)**: One reviewer noted that this proposed project builds on and complements other, previously funded NRD projects. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion D3 (Community Involvement):** Reviewers discussed that this proposed project would appear to provide an important benefit to underserved communities. One reviewer changed their score for this criterion from Medium to High based on this discussion.

Evaluation Scoring Summary

Project Name: Housatonic River Watershed Education Programs (Application No. 408)

Project Score: 253

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	9	15	15	9	0	15	15	15	**12**
2. Location of Project	15	15	15	15	15	15	15	15	**15**
3. Sustainable Benefits	0	9	15	15	9	9	9	15	**10**
4. Magnitude of Ecological Benefits	0	15	15	9	9	9	15	15	**11**
5. Human Health and Safety	10	6	10	10	10	10	10	6	**9**
6. Benefits to Multiple Restoration Categories	10	10	6	10	6	6	10	10	**9**
7. Enhancement of Remediation/Response Actions	5	0	5	5	5	0	5	0	**3**
Subtotal (max=85)	**49**	**70**	**81**	**73**	**54**	**64**	**79**	**76**	**68**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	15	15	15	15	15	15	15	15	**15**
2. Technical Capacity of Applicant and Project Team	15	15	15	15	15	15	15	15	**15**
3. Potential for Adverse Environmental Impacts	10	10	10	10	10	10	10	10	**10**
4. Measurable Results	10	10	10	10	6	10	10	10	**10**
5. Contingency Actions	10	10	10	10	6	10	10	10	**10**
6. Administrative Capacity of Applicant and Project Team	5	5	5	5	5	5	5	5	**5**
Subtotal (max=65)	**65**	**65**	**65**	**65**	**57**	**65**	**65**	**65**	**64**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	9	15	9	15	9	9	15	15	**12**
2. Implementation-Oriented	9	15	15	15	15	9	15	15	**14**
3. Budget Justification and Understanding	9	15	15	15	15	9	15	15	**14**
4. Leveraging of Additional Resources	3	6	3	3	3	3	3	3	**3**
5. Coordination and Integration	5	5	5	5	3	3	5	5	**5**
Subtotal (max=60)	**35**	**56**	**47**	**53**	**45**	**33**	**53**	**53**	**47**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	15	15	15	15	15	15	15	15	**15**
2. Fostering Future Restoration and Stewardship	15	15	15	15	15	15	15	15	**15**
3. Community Involvement	15	15	15	15	15	15	15	15	**15**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	10	10	10	**10**
5. Complementary with Community Goals	10	10	6	10	10	10	10	10	**10**
6. Public Outreach	5	5	5	5	5	5	5	5	**5**
7. Diverse Partnerships	5	5	5	3	3	5	5	5	**5**
Subtotal (max=75)	**75**	**75**	**71**	**73**	**73**	**75**	**75**	**75**	**74**
Total Score (max=285)	**224**	**266**	**264**	**264**	**229**	**237**	**272**	**269**	**253**

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Land Acquisition Project #4 (Application No. 409)

Consensus-Based Score: 186

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- PLACEHOLDER –

[In keeping with the process identified for reviewing, evaluating and selecting land acquisition projects, identifying information for this application is withheld in this document as land transaction negotiations may be adversely affected by public disclosure of project- or parcel-specific information. This information will be made publicly available after funding has been awarded to Round 4 projects and funded land protection projects have closed.]

Evaluation Scoring Summary

Project Name: Land Acquisition Project #4 (Application No. 409)

Project Score: 186

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	9	15	9	9	9	9	15	15	**11**
2. Location of Project	15	15	15	15	15	15	15	15	**15**
3. Sustainable Benefits	9	15	9	9	9	9	9	15	**11**
4. Magnitude of Ecological Benefits	0	9	9	9	9	9	9	9	**8**
5. Human Health and Safety	10	10	10	10	10	6	10	10	**10**
6. Benefits to Multiple Restoration Categories	6	10	6	0	6	10	10	10	**7**
7. Enhancement of Remediation/Response Actions	0	0	0	0	3	0	0	0	**0**
Subtotal (max=85)	**49**	**74**	**58**	**52**	**61**	**58**	**68**	**74**	**62**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	15	9	9	15	9	9	9	15	**11**
2. Technical Capacity of Applicant and Project Team	9	9	9	15	9	9	9	9	**10**
3. Potential for Adverse Environmental Impacts	10	10	10	10	10	10	10	10	**10**
4. Measurable Results	6	0	6	0	6	6	10	6	**5**
5. Contingency Actions	6	0	0	0	6	6	10	6	**4**
6. Administrative Capacity of Applicant and Project Team	3	3	3	3	3	3	3	3	**3**
Subtotal (max=65)	**49**	**31**	**37**	**43**	**43**	**43**	**51**	**49**	**43**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	0	9	9	0	9	9	9	9	**7**
2. Implementation-Oriented	15	9	15	15	15	15	15	15	**14**
3. Budget Justification and Understanding	9	9	9	9	15	0	15	9	**9**
4. Leveraging of Additional Resources	0	3	0	3	0	0	3	0	**1**
5. Coordination and Integration	3	3	3	0	3	3	3	3	**3**
Subtotal (max=60)	**27**	**33**	**36**	**27**	**42**	**27**	**45**	**36**	**34**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	9	15	9	9	15	9	15	9	**11**
2. Fostering Future Restoration and Stewardship	9	15	9	9	15	9	15	9	**11**
3. Community Involvement	9	9	9	9	15	9	0	0	**8**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	10	6	10	10	**10**
5. Complementary with Community Goals	0	0	0	0	0	6	10	6	**3**
6. Public Outreach	3	0	3	0	3	5	5	0	**2**
7. Diverse Partnerships	0	3	3	3	3	3	3	0	**2**
Subtotal (max=75)	**40**	**52**	**43**	**40**	**61**	**47**	**58**	**34**	**47**
Total Score (max=285)	**165**	**190**	**174**	**162**	**207**	**175**	**222**	**193**	**186**

Housatonic River Natural Resource Damages Fund

Round 4 Restoration Project Proposals

Doc. No. BWSC-NRD-2018-12

EVALUATION SUMMARY

Project Name: Planning for Flood Resilient and Fish Friendly Road-Stream Crossings in the Berkshire Hills (Application No. 410)

Consensus-Based Score: 202

Grant Review Team Members: United States Fish and Wildlife Service (3), Massachusetts Department of Environmental Protection (3), Massachusetts Office of Energy and Environmental Affairs (1), and Stantec Consulting Services Inc. (1).

This document summarizes the Grant Review Team's discussions related to Evaluation Criteria discussed during the consensus-based evaluation meeting held on November 8, 2018. Only the specific Evaluation Criteria discussed are presented below.

Summary of Criteria Discussed:

- **Criterion A3 (Sustainable Benefits):** Reviewers discussed that stream crossings require some level of maintenance, and one reviewer changed their score for this criterion from High to Medium based on this discussion. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A4 (Magnitude of Ecological Benefits)**: Several reviewers noted that there is not a high level of confidence that the designs developed as a part of this proposed project will be implemented. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A5 (Human Health and Safety)**: One reviewer changed their score for this criterion from Low to high based on their understanding of the risks to human health and safety related to the design of culverts. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion A6 (Benefits to Multiple Restoration Categories)**: One reviewer stated that this application does not explicitly address the Restoration Priority Categories. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion B1 (Technical/Technological Feasibility)**: One reviewer stated that evidence wasn't provided in the application that the proposed project would lead to implementation of the design plans and construction of the culvert replacements. This reviewer also stated that the application was presented in a manner that was difficult to read. Other reviewers noted that scores for this criterion relate to feasibility of design. No scores were changed as a result of this discussion. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion B3 (Potential for Adverse Environmental Impacts)**: One reviewer changed their score for this criterion from Low to High based on their understanding of the criterion and that the proposed project would have little to no potential for adverse environmental impacts. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

- **Criterion B5 (Contingency Actions):** Two reviewers stated contingency actions weren't addressed in the application. Another reviewer noted that applicant and project partners appeared to bring appropriate resources to address contingencies. One reviewer changed score their score for this criterion from Medium to Low because contingency actions weren't adequately addressed in the application. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion C1 (Relationship of Expected Costs to Expected Benefits)**: Reviewers noted that there is no certainty that designs developed as a part of this proposed project will be implemented and therefore result in actual habitat restoration. They noted that the application does not indicate that funds are committed for project construction following design development and several reviewers noted that they didn't feel confident that the potential benefits associated with eventual construction of these projects would necessarily be achieved. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.
- **Criterion C4 (Leveraging of Additional Resources):** One reviewer changed their score for this criterion from High to Medium based on a math correction.
- **Criterion D5 (Complementary with Community Goals):** One reviewer reduced their score for this criterion from High to Medium based on review of the application. Unanimity among individual scores was not achieved in the course of the discussion, but reviewers expressed consensus that the final individual scores yielded an acceptable average score for this criterion.

Evaluation Scoring Summary

Project Name: **Planning for Flood Resilient & Fish Friendly Crossings (Application No. 410)**

Project Score: **202**

CATEGORY & CRITERIA	INDEPENDENT EVALUATION SCORES								
	GR1	GR2	GR3	GR4	GR5	GR6	GR7	GR8	Average
A. RELEVANCE AND APPLICABILITY OF PROJECT									
1. Natural Recovery Period	9	9	9	9	9	15	9	15	**11**
2. Location of Project	15	15	15	15	15	15	15	15	**15**
3. Sustainable Benefits	0	9	0	0	9	9	9	9	**6**
4. Magnitude of Ecological Benefits	9	15	9	9	9	15	9	15	**11**
5. Human Health and Safety	10	10	10	10	10	6	10	10	**10**
6. Benefits to Multiple Restoration Categories	6	6	6	0	6	10	6	10	**6**
7. Enhancement of Remediation/Response Actions	0	0	0	5	5	0	0	0	**1**
Subtotal (max=85)	**49**	**64**	**49**	**48**	**63**	**70**	**58**	**74**	**59**
B. TECHNICAL MERIT									
1. Technical/Technological Feasibility	15	15	9	0	15	15	15	15	**12**
2. Technical Capacity of Applicant and Project Team	15	9	15	15	9	15	9	15	**13**
3. Potential for Adverse Environmental Impacts	10	10	10	10	10	6	10	6	**9**
4. Measurable Results	6	6	6	6	6	6	6	6	**6**
5. Contingency Actions	6	6	6	0	6	0	10	6	**5**
6. Administrative Capacity of Applicant and Project Team	5	3	5	5	3	3	5	3	**4**
Subtotal (max=65)	**57**	**49**	**51**	**36**	**49**	**45**	**55**	**51**	**49**
C. PROJECT BUDGET									
1. Relationship of Expected Costs to Expected Benefits	0	15	0	9	9	9	0	9	**6**
2. Implementation-Oriented	9	0	15	9	9	9	15	15	**10**
3. Budget Justification and Understanding	9	15	15	9	15	15	15	15	**14**
4. Leveraging of Additional Resources	3	3	3	3	3	3	3	3	**3**
5. Coordination and Integration	3	5	5	5	5	5	5	5	**5**
Subtotal (max=60)	**24**	**38**	**38**	**35**	**41**	**41**	**38**	**47**	**38**
D. SOCIOECONOMIC MERIT									
1. Enhancement of Public's Relationship w/ Natural Resources	9	9	0	9	9	9	15	9	**9**
2. Fostering Future Restoration and Stewardship	9	15	9	9	15	15	15	15	**13**
3. Community Involvement	15	9	9	9	9	9	9	9	**10**
4. Potential for Adverse Socioeconomic Impacts	10	10	10	10	6	6	10	10	**9**
5. Complementary with Community Goals	6	10	10	0	6	6	10	6	**7**
6. Public Outreach	5	5	5	3	5	3	5	5	**5**
7. Diverse Partnerships	5	3	5	3	3	5	5	5	**4**
Subtotal (max=75)	**59**	**61**	**48**	**43**	**53**	**53**	**69**	**59**	**56**
Total Score (max=285)	**189**	**212**	**186**	**162**	**206**	**209**	**220**	**231**	**202**

Appendix D -

Written Public Comments

Written Public Comments Received in Response to Project Application:

Application No. 401 -

Japanese Knotweed Control Along the Housatonic River

Potter, Thomas (DEP)

From: Jenny Hansell <JHansell@bnrc.org>
Sent: Wednesday, May 15, 2019 3:39 PM
To: Potter, Thomas (DEP); Tom Zetterstrom; Jess Toro
Subject: BNRC comments on Proposal #401 for knotweed control
Attachments: SKM_C224e19051515470.pdf

Dear Mr. Potter,

Please find attached comments from Berkshire Natural Resources Council in support of the proposal to undertake Japanese Knotweed control on the Housatonic River in southern Berkshire County.

-Jenny

Jenny Hansell
President
Berkshire Natural Resources Council
20 Bank Row
Pittsfield, MA 01201
(413) 499-0596
Fax: (413) 499-3924
jhansell@bnrc.org

www.bnrc.org
www.berkshirehighroad.org

From: Roxanne Gawthrop
Sent: Wednesday, May 15, 2019 3:36 PM
To: Jenny Hansell
Subject: FW: Message from KM_C224e

Here is the letter to Mr. Potter.

I added the date, abbreviated Headquarters to HQ in line 4 of address, and removed hyphen in "well thought out."

Rox

From: BNRC Scanner
Sent: Wednesday, May 15, 2019 3:33 PM
To: Roxanne Gawthrop <rgawthrop@bnrc.org>
Subject: Message from KM_C224e

May 15, 2019

Thomas M. Potter, LEED Green Assoc.
Chief, Clean Energy Development Coordinator
Lead Administrative Trustee – Housatonic River Site
MassDEP | Bureau of Waste Site Cleanup | Boston HQ Office
One Winter Street, 6th Floor
Boston, Massachusetts 02108

Dear Mr. Potter,

I am writing to urge the support of Proposal #401, a plan to control Japanese knotweed on the Housatonic River in Southern Berkshire County. It's not too late to make real and sustainable inroads in the spread of knotweed which, if unchecked, will have devastating impacts on our local ecosystem.

Native Habitat Restoration is working in concert with 7 towns to address this problem. Their plan is well thought out and will make a long-lasting impact on the problem. Now is the time to attack this pernicious invasive head-on. There is widespread support for the initiative and that support will continue and grow as the public's understanding of the issue increases.

Please consider funding this grant, before it's too late.

Sincerely,

Jenny Hansell
President

BERKSHIRE
Natural Resources Council
THE LANDKEEPERS

Board of Directors

Jenny Hansell, President
Tim Crane, Chairman
Pat Callahan, Vice Chairman
Kim Seward, Secretary
Tom Curtin, Treasurer

Gregg Charbonneau
Walter Cliff
Susan Crofut
Henry Flint
Ellen Hand
Larry Lane
Tim Lovett
Donald MacGillis
John Mancia
Karen Coy Ross
Ron Shaw
Syd Smithers
Brian Tobin
Elena Traister

20 Bank Row
Pittsfield MA 01201
413 499 0596
bnrc.org

Potter, Thomas (DEP)

From:	Tom Zetterstrom <zetterstromtom@gmail.com>
Sent:	Wednesday, May 15, 2019 1:59 PM
To:	Potter, Thomas (DEP)
Cc:	julie Richburg; Christian Marks; Jenny Hansell; Kathy Orlando; Anne Barrett; Wislocki G A; William Tingley; Lynn Werner; Maria Grace; landonjb1@gmail.com; Shelly Harms; Connie Manes; Bob Gambino; Christian Allyn Selectman; Tim Abbott; george massey; Michael Benjamin; Marc Andreotto; stacie.weiner@rbc.com; Geoff Drury; Rachel Fletcher; Christine Ward; Klingebiel, Jesse; Jim Krissell; liz_lacy@nps.gov; Jastremski, Michael; michael.humphreys@po.state.ct.us; Ed Kirby; Phil Hart; Robeys@kent-school.edu; Gordon Ridgeway; Gordon Whitbeck; Karen G. Nelson
Subject:	Re: Comments on Proposal #401 to Mass DEP
Attachments:	wildandscenic2017.jpg; ATT00001.htm; Knotweed Survey MapV4.pdf; ATT00002.htm

Thomas M. Potter, LEED Green Assoc.®
Chief, Clean Energy Development Coordinator
Lead Administrative Trustee – Housatonic River Site
MassDEP | Bureau of Waste Site Cleanup | Boston Headquarters Office
One Winter Street, 6th Floor, Boston, Massachusetts 02108

Dear Thomas Potter,

As Coordinator of the Knotweed Initiative of the "Wild and Scenic" Housatonic for the Housatonic River Commission in Connecticut, I write to urge full support of Proposal #401 for control of Japanese knotweed on a landscape scale of contiguous riparian properties along the river in Sheffield and Great Barrington, Massachusetts.

Starting at the Massachusetts border and running 42 miles downriver to New Milford, the Housatonic is soon expected to receive Wild and Scenic designation by the National Park Service. Habitat conservation and river health have been central concerns in our region for more than half a century. Please see the Housatonic Valley Association's W & S Housatonic map below. Large areas have been protected from development, but knotweed is lawless, flouts state and property boundaries, ruthlessly defeats native riparian plant diversity and has the potential to make a mockery of the term Wild and Scenic in Connecticut.

Concerted effort on the part of the Knotweed Initiative to protect our section of the river from knotweed began two years ago in partnership with the Housatonic River Commission which is comprised of representative from seven northwestern Connecticut towns. Last Summer we competed a paddle survey of both banks of the river, on the basis of which the map department of the Housatonic Valley Association converted GPS data into the 2nd map shown below. Our survey indicates that we are well within the manageable range and

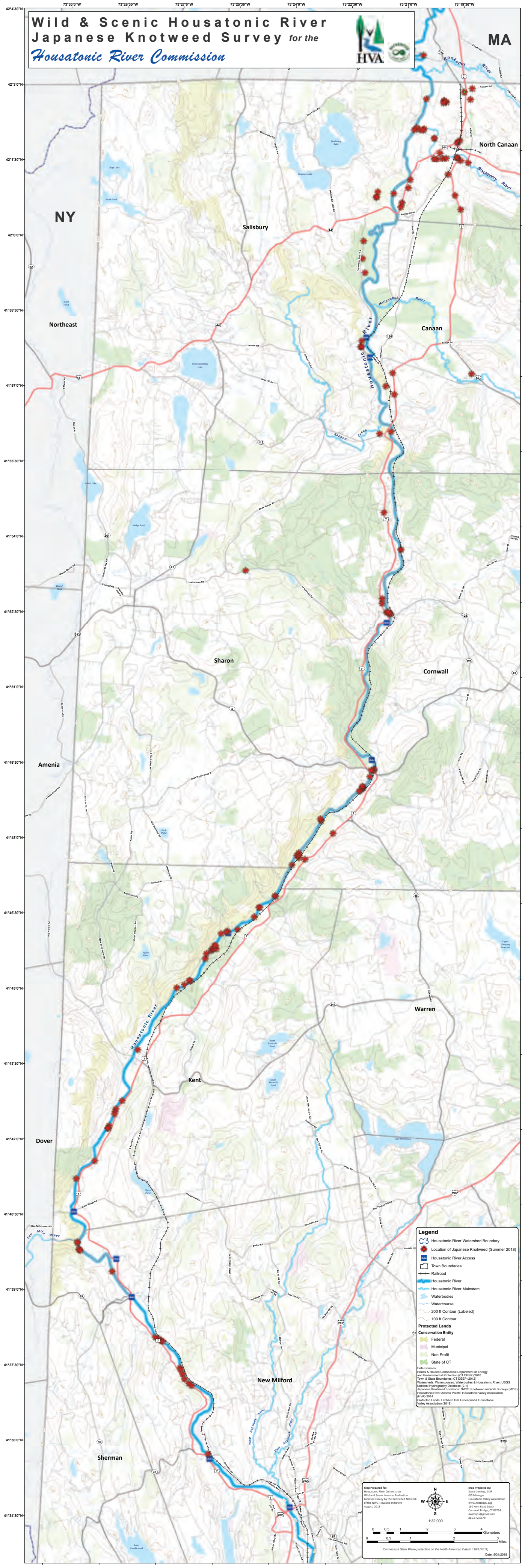
can expect to reduce knotweed infestation to very low levels. Already 20 sites have been treated with very high knotweed mortality;
in some cases we have achieved total eradication, and these areas are being restored with appropriate ground cover.

We are keeping a nervous eye just to the north in Massachusetts. There is a fortunate buffer of low knotweed infestations, particularly at Bartholomew's Cobble, the first property in Massachusetts, where the Trustees of Reservations protects that precious and dramatic riparian landscape and flood plane forests. Several additional miles northward are knotweed free. In the more northerly sections of Sheffield and into Great Barrington, however, knotweed has taken its toll, and is threatening to undermine downstream control efforts.

For the ecological and recreational benefit of the Housatonic in Massachusetts, knotweed deserves to be controlled. Out of concern and curtesy to your down stream riparian neighbors in Connecticut, knotweed deserves to be controlled. We want to proud of our river, not embarrassed by highly visible evidence of our negligence, and hope to be able to work cooperatively with our shared watershed neighbors to the north.

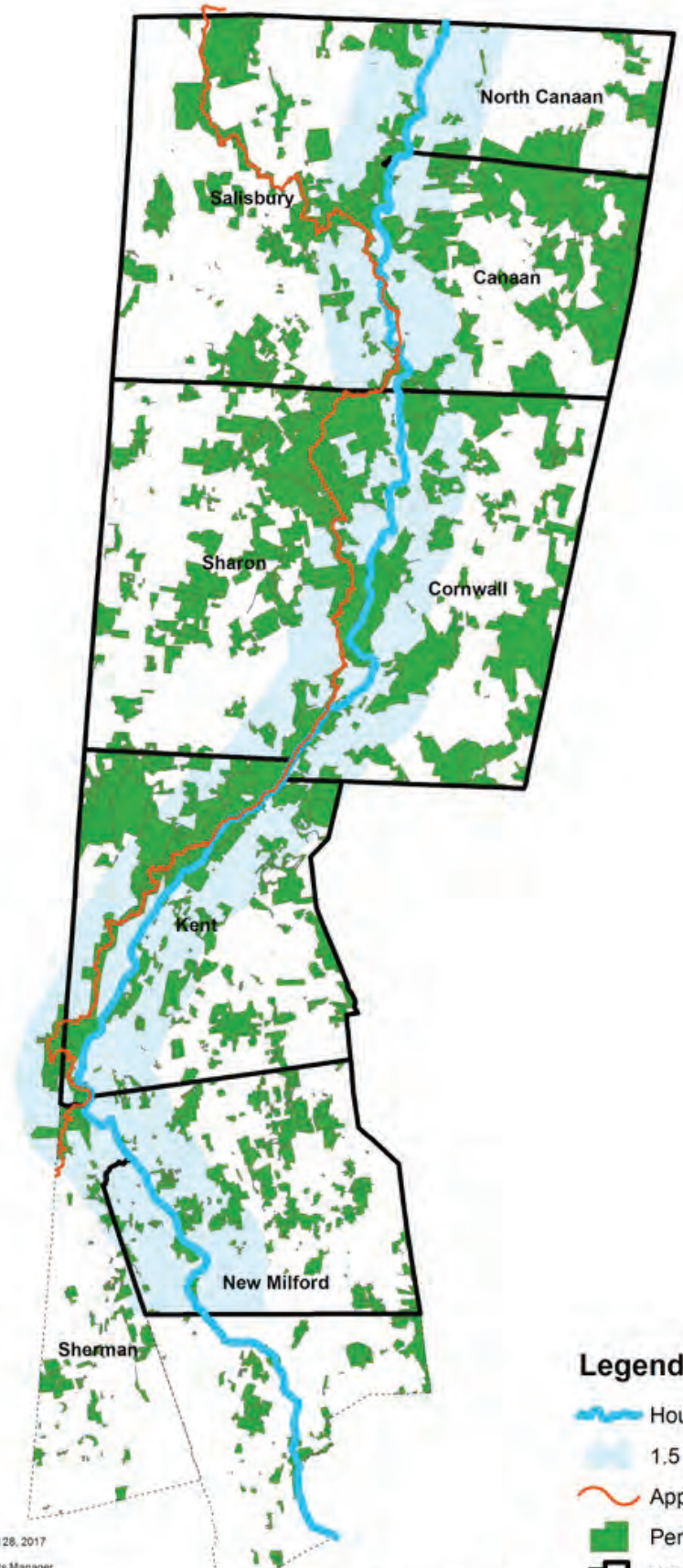
Sincerely,

Tom Zetterstrom
NWCT Knotweed Initiative
860 824-7604



Wild & Scenic Housatonic River
Japanese Knotweed Survey for the
Housatonic River Commission
HVA
NY
MA
North Canaan
Salisbury
Northeast
Canaan
Sharon
Cornwall
Amenia
Warren
Kent
Dover
New Milford
Sherman
Housatonic River
Legend
Housatonic River Watershed Boundary
Location of Japanese Knotweed (Summer 2018)
Housatonic River Access
Town Boundaries
Railroad
Housatonic River
Housatonic River Mainstem
Waterbodies
Watercourse
200 ft Contour (Labeled)
100 ft Contour
Protected Lands
Conservation Entity
Federal
Municipal
Non Profit
State of CT
Data Sources:
Roads & Routes:Connecticut Department or Energy and Enviornmental Protection (CT DEEP) 2010
Town & State Boundaries: CT DEEP (2012)
Watersheds, Watercourses, Waterbodies & Housatonic River: USGS National Hydrography Database (2.1)
Japanese Knotweed Locations: NWCT Knotweed network Surveys (2018)
Housatonic River Access Points: Housatonic Valley Association (HVA)-2014
Protected Lands: Litchfield Hils Greenprint & Housatonic Valley Association (2018)
Map Prepared for:
Housatonic River Commission
Wild and Scenic Invasive Evaluation
Location survey by the Knotweed Network of the NWCT Invasive Initiative
August, 2018
Map Prepared By:
Stacy Deming, GISP
GIS Manager
Housatonic Valley Association
www.hvatoday.org
150 Kent Road South
Cornwall Bridge, CT 06754
hvamaps@gmail.com
860.672.6678
1:32,000
Kilometers
Miles
Connecticut State Plane projection on the North American Datum 1983 (2011)
Date: 8/31/2018

Permanently Protected Land in the Wild & Scenic Housatonic River (2017)



HVA

Map created on April 28, 2017
by Ryan A. Williams
Conservation Projects Manager
Housatonic Valley Association

0 1 2 4 6 8 Miles

DATA: Permanently protected land is a layer developed by the Housatonic Valley Association (HVA) with assistance from members of the Litchfield Hills Greenprint Collaborative, a Regional Conservation Partnership led by HVA.

Legend

- Housatonic River
- 1.5 Mile River Buffer
- Appalachian Trail
- Permanently Protected Land
- Wild & Scenic Towns
- Adjacent River Towns

Potter, Thomas (DEP)

From: W. R. Tingley <wrtingley@gmail.com>
Sent: Wednesday, May 15, 2019 10:08 AM
To: Potter, Thomas (DEP)
Subject: Japanese Knotweed and the Housatonic River

Dear Mr. Potter,

I am writing with regard to Proposal 401 and the need for for grant money to pursue control of Japanese Knotweed, an aggressive invasive plant that seriously threatens the Housatonic River environment. I urge you to help facilitate the money needed to make a significant effort in this effort as we face an accelerating problem that could quickly and easily transform the banks of our river. There is no time to lose. In Connecticut, where northernmost 42 miles are under consideration for US Wild and Scenic status, a battle is being waged, but without an equal effort from our upstream neighbors, we are definitely not going to win the war.
Please do all that you can to ensure enthusiastic and well funded participation in your state so that we might have a chance to stop the alarming out of control spread of Japanese Knotweed. I would appreciate hearing from you and your comments as this grant application proceeds. Thank you.

Sincerely, William R. Tingley

Chairman, Housatonic River Commission

W.R. Tingley

860 248-1919 (cell)
Sent from my iPad

Written Public Comments Received in Response to Project Application:

Application No. 403 -

Land Acquisition Project #1#1

One written public written comment was received for this project and is withheld from this document for the purpose of protecting the confidentiality of realty negotiations. The comment was received from the project applicant and described that the negotiated agreement with the landowner is $20,000 less than the amount that was anticipated in the project application; therefore, the anticipated project budget is reduced by the same amount.

[As described in preceding sections of this document, parcel-specific information for proposed land acquisition projects is not included in this document. This information will be provided following closing of selected land acquisition projects, as described in Section 1.6.4 of this document. Land acquisition projects selected for Round 4 of the Restoration Program will be publicly announced after the associated realty transactions have been completed.]

Appendix E -

Meeting Notes for May 1, 2019, Public Meeting

Meeting Notes

Public Meeting
Draft Round 4 Restoration Plan & Supplemental Environmental Assessment

Massachusetts Housatonic River Watershed Restoration Program

Date/Time:	May 1, 2019 / 5:30 PM
Place:	Lenox Library, Welles Gallery, Massachusetts
Attendees:	Thomas Potter (MassDEP), MA SubCouncil, State Trustee Representative; Molly Sperduto (US Fish and Wildlife Service), MA SubCouncil, Federal Trustee Representative; Robin MacEwan (Stantec); and Attendees (see Attendance Sheet, attached)
Distribution:	Program Website (www.ma-housatonicrestoration.org)

These meeting notes summarize the proceedings, including the responses provided during the question-and-answer period, of the Draft Round 4 Restoration Plan and Supplemental Environmental Assessment (RP/SEA) Public Meeting hosted by the Massachusetts SubCouncil of the Housatonic River Natural Resource Trustees (MA SubCouncil).

Introductions

The meeting formally commenced at 5:40 PM. Thomas Potter (MassDEP) welcomed attendees and introduced the purpose of the meeting, following which meeting attendees introduced themselves.

Presentation

The MA SubCouncil gave a presentation that provided an overview of the Massachusetts Housatonic River Watershed Restoration Program (Restoration Program) and introduced the MA SubCouncil's preferred alternative for Round 4 of the Restoration Program.

The meeting agenda and PowerPoint presentation slides from the MA SubCouncil's presentation are available on the program website at: http://www.ma-housatonicrestoration.org/library. Additional resources referenced during the meeting, including the Draft Round 4 RP/SEA and the Restoration Project Selection Procedure (RPSP) are also available on the program website.

Open Forum[1]

Following the MA SubCouncil's presentation, the MA SubCouncil hosted Open Forum / Q&A portion of the meeting. Questions and comments posed by the audience, and answers provided by the MA SubCouncil, are summarized below.

Question 1: Why is funding being proposed to be allocated for culvert replacement projects if there are state programs that provide funding for these types of projects and is there a way that these funding programs could work together and that culvert replacement initiatives could be coordinated?

> ***MA SubCouncil Response:*** *There are programs at the state level that provide support for culvert-replacement projects, including the Massachusetts Department of Transportation*

[1] Questions and responses presented in these meeting notes are paraphrased and summarized; they do not represent direct quotes. Additional information has been added to certain responses presented here for the purpose of further clarification.

(MassDOT) for state roads as well as the Massachusetts Department of Fish and Game, Division of Ecological Restoration (DER), which typically supports municipal DPW projects. While there are state resources to support culvert replacement projects, requests for funding have generally exceed available grant monies. As a part of Round 4 of the Restoration Program, the MA SubCouncil selected for funding a culvert replacement project that will provide significant restoration benefits through restoring connectivity along what has been identified as an exemplary cold-water fishery in the Housatonic River watershed. This type of project has a strong nexus to the objectives of this Restoration Program. In response to the second half of the question, the MA SubCouncil also noted that state agencies are working together to strengthen culvert replacement support initiatives results in, among other things, improvement to culvert replacement design standards.

Question 2: With regards to land acquisition projects funded through the Restoration Program, why is the information currently confidential, who owns the land at the end of the project, and what is the level of protection that is provided?

MA SubCouncil Response: *As described in the Draft Round 4 RP/SEA, due to the unique sensitivities of land acquisition projects, parcel-specific and project-identifying information will not be made available for public review before land acquisition transactions have closed. This more confidential process for land acquisition projects is intended to accommodate land transaction negotiations that could be adversely affected by the public disclosure of certain information. The specific process for reviewing and selecting land acquisition projects in Round 4 of the Restoration Program is based on the process that was developed, with public input, based on feedback received after Round 1 of the Restoration Program and subsequently used for review and selection of land acquisition projects for Round 3 of the Restoration Program.*

Land that have been acquired through previous Rounds of the Restoration Program are typically owned by a land trust, municipality, or a state agency. It is a requirement that land acquired as a part of the Restoration Program be protected in perpetuity. In addition to the restrictions associated with the conservation mechanism provided through the owner (e.g., deed restriction, conservation easement), land also has Article 97 protection status and the owner of the parcel and/or conservation restriction is responsible to comply with the protection status of the land.

Question 3: Is it possible to reveal the total acreage of the proposed land acquisition projects?

MA SubCouncil Response: The total acreage of land acquisition projects included in the preferred alternative for Round 4 was not included in the Draft Round 4 RP/SEA, but the MA SubCouncil noted at the meeting that this composite information can be provided prior to closing of the proposed land acquisition transactions without jeopardizing these potential transactions. While this information was not readily available to the MA SubCouncil at the time the question was posed at the meeting, it is provided in these meeting notes as a follow-up: A total of 84.75 acres is included in the land acquisition projects selected by the MA SubCouncil as a part of the preferred alternative for Round 4 as presented in the Draft Round 4 RP/SEA.

Question 4: How will PCBs and other contaminants affect the restoration projects; for example, how could the Calcareous Fen Restoration Project be considered a successful restoration project if PCBs aren't remediated at the project site?

MA SubCouncil Response: *Restoration projects selected by the MA SubCouncil as a part of the preferred alternative for Round 4 of the Restoration Program were not located in areas directly impacted by PCBs and other hazardous materials released by GE. Proposed restoration projects included in the preferred alternative are located within the greater watershed, outside of the areas of direct impact, and are intended to compensate for injuries to natural resources and services resulting from the direct impacts of release of PCBs and other hazardous substances.*

Question 5: How does the public receive confirmation that selected land acquisition projects have been successfully implemented using these funds?

MA SubCouncil Response: *Project-specific information regarding land acquisition projects will be made public after the real estate transactions are completed. The MA SubCouncil expects that, as in past rounds, this information may be provided in a press release and will also be posted to the project website. Interested parties can review project information previously provided for land acquisition projects completed in Rounds 1 and 3 of the Restoration Program to understand the types of land acquisition projects previously funded and the types of project information that will be made public following completion of land acquisition transactions.*

Question 6: After the due diligence phase is completed for the land acquisition projects, will there be an opportunity for public comment?

MA SubCouncil Response: *Project- and parcel-specific information regarding land acquisition project will not be made public until the real estate transactions have been completed. The Draft and Final Round 4 RP/SEA will include information related to the type of habitat in the proposed land acquisition projects but will not include more specific information. The MA SubCouncil recognizes it is difficult to provide public comment for land acquisition projects but noted that this approach was developed based on concerns raised during Round 1 of the Restoration Program when land acquisition projects were made public prior to completion of real estate transactions. The current process for reviewing and selecting land acquisition projects was developed, with public input, based on feedback received following Round 1 of the Restoration Program. The process attempts to accommodate specific identified sensitivities associated with land transactions while addressing the objectives of the Restoration Program. Round 3 of the Restoration Program was focused entirely on land acquisition and utilized this process. For additional information, interested parties can review the Round 3 materials available on the project website, including the Draft and Final Round 3 RP/SEA, application scoring summaries, and land acquisition project applications (made public following close of land acquisition transactions).*

Question 7: What types of information were provided as part of the applications for land acquisition projects?

MA SubCouncil Response: *The application requirements, including information required to be submitted, are as described in the Grant Announcement and Application (GAA).*

Multiple types of information, including location, size, resource areas and habitat types, nexus to the injured resource, and intended use(s) of the parcel(s), were provided in land acquisition project applications and helped inform an understanding of how the proposed projects would meet the the objectives of the Restoration Program.

Comment 1: As a land acquisition project applicant, thank you for the sensitivity to the unique considerations associated with the land acquisition process. It can be problematic if the details of proposed land acquisition projects are made public prior to closing of the related land acquisition transaction.

Comment 2: I like the projects selected but wish there was more funding available and that the Japanese Knotweed Control Along the Housatonic River project could have been funded.

Question 8: Aquatic invasive plant species are a problem in the watershed and across the state. Is there work at the state level that is focused towards improved and coordinated management of aquatic invasive plant species, for example water chestnuts?

MA SubCouncil Response: *Separate from the MA SubCouncil's work as a part of the Housatonic River Watershed Restoration Program, there is currently a proposal to create a state-wide coordinator for invasive species management; this would support an identified need to coordinate efforts and identify funding sources. The MA SubCouncil has supported aquatic invasive species management projects in previous rounds of the Restoration Program and acknowledges that the Housatonic River watershed would benefit from additional focus on management of invasive species. The MA SubCouncil noted that watershed-level coordinating groups have helped to make other invasive species management projects successful and agreed that the Housatonic River watershed could benefit from such a coordinating body.*

Comment 3: NRD funding has been a relatively unique funding source for invasive plant control projects in the Housatonic River Watershed as it can be used to fund projects that span multiple parcels; whereas, other common funding resources require a site-by-site approach.

Comment 4: I want to commend you for the clarity and transparency of this process.

The meeting adjourned at approximately 6:45 PM.

The foregoing is considered to be a true and accurate record of the items discussed. If discrepancies or inconsistencies are noted, please contact Thomas Potter at 617-292-5628.

Stantec Consulting Services Inc.

Robin MacEwan
Principal, Environmental Services
Phone: 413-584-4776
Robin.macewan@Stantec.com

Attachment: Attendance Sheet

Massachusetts SubCouncil, Housatonic River Natural Resource Trustees
General Electric/Housatonic River Natural Resource Restoration

PUBLIC MEETING

Draft Round 4 Restoration Plan &
Supplemental Environmental Assessment (RP/SEA)
Housatonic River Natural Resource Damages Fund

Wednesday, May 1, 2019, at 5:30 PM
Lenox Public Library, Welles Gallery
18 Main Street, Lenox, Massachusetts

ATTENDANCE SHEET

Name	Organization
Libby Herland	(not provided)
Kate Buttolph	Mass Audubon
Gordon Clark	Stantec Consulting Services Inc.
Michael Chelminski	Stantec Consulting Services Inc.
Robin MacEwan	Stantec Consulting Services Inc.
Cathy Kiley	MassDEP
Dale Abrams	Mass Audubon
Jess Toro	Native Habitat Restoration
Bob Sondak	(not provided)
Janet Hiles	(not provided)

Name	Organization
Alison Dixon	Housatonic Valley Association
Becky Cushing	Mass Audubon
Dennis Regan	Formerly Housatonic Valley Association
William Mathews	Lee Historical Commission
Angela Vuagniaux	Heartflow – Honoring the Housatonic River
Nina Ryan	(not provided)
Paul Shelhamer	(not provided)
Karen Pelto	MassDEP
Thomas Potter	MassDEP
Molly Sperduto	USFWS