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TOWN OF STOCKBRIDGE
STOCKBRIDGE BOARD OF HEALTH

January 19, 2024

[VIA EMAIL: tagliaferro.dean@epa.gov]

Mr. Dean Tagliaferro
EPA New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

RE: Rest of River – General Electric Transportation & Disposal Plan Public Comments

Dear Mr. Tagliaferro,

The Stockbridge Board of Health Board of Health hereby submits this into the public comment record regarding the October 31, 2023, General Electric Proposed Transportation and Disposal Plan.

The Board urges the EPA to consider our public health concerns and ask that G.E. rewrite their proposal as the current proposal is inadequate and incomplete and a missed opportunity to study the efficacy of rail. The October 31, 2023, plan relies heavily, if not exclusively, on transport of PCB laden materials by truck for both on-site and off-site disposal. Although transportation by rail was consistently mentioned favorably in previous iterations of plans for cleanup of the Rest of Housatonic River, the current plan does little beyond raising some objections to use of rail, primarily the need for physical improvements, access to privately owned land, possible increased truck trips, etc., but did not appear to pursue the issue beyond the preliminary studies completed three years ago by the Housatonic Railroad Company. These studies concluded that transport by rail was feasible, including creating rail access to the UDF. Further detailed study of the feasibility of rail is needed, hopefully accompanied by specific proposals.

The apparent *de facto* exclusion of rail transport in favor of trucks has emerged as a focus of our concerns. We need more information, and particularly comparable information between trucks and rail, regarding emissions, greenhouse gases, air quality, noise pollution, pedestrian and driver safety, recreational opportunities, and overall community health and safety. We note that these are among the issues to be undertaken by the Quality-of-Life Compliance Plan to be submitted to EPA in December 2023. We feel these issues need to be addressed as integral to the Transportation Plan as well.

If gaps in funding are identified with the efficacy of a rail study, we implore our state and federal delegation to identify the federal resources needed to study and implement the use of rail if

such a study finds the use of rail feasible. GE's lack of willingness to utilize additional funding is not the sole reason to determine if rail is not feasible.

Having attended the G.E. presentation at the Lee High School on November 28th it is evident that there was not much thought into presenting any information or data regarding studies that should have been done on the environmental impact for our towns.

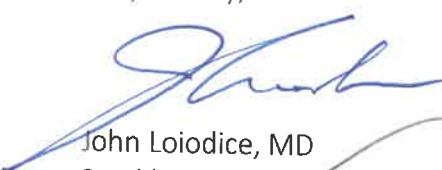
Berkshire County is a major tourist destination, drawing thousands of people for concerts, stage productions, hiking, camping, boating, leaf peeping, skiing, and general relaxation. The effect of truck traffic on the tourist industry may be significant. Due to exponential increases in population during the tourist season, we have not seen any information on a traffic study that may impact truck transportation during peak seasons. Our concern also extends to the many residents that have voiced their anxiety and fear over the trucks driving past their front yards and children's school playgrounds. The mental health of our residents needs to be counted into the process.

As stated, several times, a safe environment, and the wellbeing of our town residents during this entire remediation is our major concern and needs to be addressed before any further action is taken by G.E.

Furthermore, it is clear that delay in implenting the remediation of PCB contamination in the Housatonic River endangers the public health and safety of our community. We urge the EPA to abandon GE's choice to use trucks because it is obvious that use of railroad will not only enable the implementation to begin earlier than trucks, before the local disposal facility has been completed, but use of railroad will also enable concurrent excavations, thereby speeding the entire implementation process, without the burdens of increased simultaneous truck transport.

We also urge the EPA to extend the deadline for the public comment period (2/1/24) for several months to allow an in-depth study on the efficacy of rail to be completed by an entity other than GE, such as the University of Massachusetts, and an adequate subsequent period of public review and comment.

Respectfully,



John Loiodice, MD
Stockbridge Board of Health



Elias Leiferman, PhD



Charles Kenny, MD, Chair



James J. Wilusz, RS
Executive Director/Tri-Town Health Department

cc: The Honorable Edward Markey, U.S. Senate
The Honorable Elizabeth Warren, U.S. Senate
The Honorable Richard Neal, U.S. House of Representatives
Her Excellency Maura Healey, Governor of Massachusetts
The Honorable Paul Mark, State Senator
The Honorable Smitty Pignatelli, State Representative, 3rd Berkshire
Town Managers
Tri-Town Health Department
Tri-Town Board of Health Members