

Fusaro, Carolyn

From: Gonyea, Donald
Sent: Monday, February 04, 2013 2:04 PM
To: Fusaro, Carolyn
Subject: FW: Concern about Exide's inadequate plan to clean up the Mill River

Importance: Low

For inclusion in the Exide file

From: Creighton, James
Sent: Monday, February 04, 2013 1:42 PM
To: Eason, Joyce
Cc: Inglese, Oswald; Gonyea, Donald
Subject: RE: Concern about Exide's inadequate plan to clean up the Mill River
Importance: Low

Don Gonyea is handling any Exide hearing correspondence and will respond to Mr. Campbell.

From: Eason, Joyce
Sent: Monday, February 04, 2013 1:27 PM
To: Creighton, James
Cc: Inglese, Oswald
Subject: FW: Concern about Exide's inadequate plan to clean up the Mill River

Hi,
Please cc on response.
Thanks

From: DEEP Webmaster
Sent: Monday, February 04, 2013 1:12 PM
To: Eason, Joyce
Subject: FW: Concern about Exide's inadequate plan to clean up the Mill River

Original message attached.

From: Bob Campbell [<mailto:bobcampbell2010@gmail.com>]
Sent: Monday, February 04, 2013 8:44 AM
To: DEEP Webmaster
Subject: Concern about Exide's inadequate plan to clean up the Mill River

Dear Commissioner Esty,
I am writing to ask your consideration, in your position as DEEP Commissioner, of my concerns about the proposed Exide Mill River Remediation Action Plan and its significant deficiencies as an adequate restoration program for the damage this river has suffered. As a member of Trout Unlimited's local Nutmeg Chapter in whose geographic area the Mill River flows, please allow me to express my views by reiterating below our Chapter's position, representing our almost four hundred members residing in Fairfield and surrounding towns, which succinctly reflects the serious shortfalls of the Plan, and therefore my strong concerns about it.

Trout Unlimited's mission is to conserve, protect and restore coldwater fisheries and their watersheds. As such, we have been following Exide's remediation effort with great interest for many years. We are encouraged to see a Remedial Action Plan come together, but we do have some substantial concerns that echo those expressed by the Town of Fairfield's Conservation Department among others.

First, we question the wisdom of any Remedial Action Plan for lead impacted river sediment that does not include a comparable action plan for chromium impacted river sediment. Second, we do not believe Exide has done enough to evaluate and explain the environmental risks potentially associated with in-water dredging activity during the spawning season. Third, this plan does not address the need for a fish passage as an essential component of remediation. Fourth, no provision of public access is addressed. Lastly, we have yet to see any plan to restore the river to its natural state once the dredging is complete. A true remediation effort would include re-filling the dredged holes with clean soil, restoring the river bottom with structural habitat including rocks and logs and finally, re-planting the river banks with native plant species.

Related to these concerns and warranting specific attention is the issue of the river herring run (alewives and blueback.) NOAA is considering these species for endangered species status. Exide is saying that their dredging process poses no issue to the spawning of these fish because the slurry will be contained and therefore they should be allowed to dredge during the spring spawning season. However, based on the technique used in 1983 — cutterhead dredge and floating silt curtain — which seems to be much the same as the one proposed now, there was plenty of spillover which moved lead all over the river. Certainly this will seriously jeopardize successful river herring spawning.

Commissioner Esty, the Mill River is one of Fairfield County's natural treasures. It is one of only a handful of specially designated Class One Wild Trout Streams in Connecticut. Its estuarial confluence with Long Island Sound could, with an adequate restoration plan, once again be a healthy environment for our unique natural treasures (and economic resources) such as sea-run brown trout, and for safe use and enjoyment by residents of Fairfield and adjacent towns. This is finally the moment for a prudent plan to correct the damage to the Mill and restore its health and value to all of us.

Thank you for considering my views on this very important issue.

Very sincerely,
Bob Campbell
Trumbull