



Quinnipiac River Watershed Association

contact: Martin Mador 203 281 4326
Mary Mushinsky, Executive Director 203 237 2237

Proposed Corrective Measures for the Pharmacia & Upjohn Company LLC Facility, 41 Stiles Lane, North Haven, Connecticut

Statement of the Quinnipiac River Watershed Association

August 4, 2010

I, Martin Mador, as a director and past president of the organization, am submitting this statement on behalf of the entire board of the Quinnipiac River Watershed Association. The QRWA was established as a non-profit, 501(c)(3) organization in 1979, with a mission to work with the citizenry to address the many environmental issues of the densely populated Quinnipiac River watershed. QRWA enlists hundreds of volunteers every year to assist in on-going education programs, river clean-ups, water quality monitoring, and other projects. Our most important priorities along the 38 mile length of the watershed include ensuring that activities and developments that occur along the river, its tributaries, and within the watershed area are compatible with the long-term health of the river and its surroundings. QRWA promotes the use of best available watershed management practices and technology, the restoration of native vegetation and rigorous enforcement of state and federal environmental regulations.

In reviewing the proposed remediation program (Corrective Measure Alternative 4 in the CMS) for the site, QRWA's concerns include the river itself, the health of terrestrial and aquatic wildlife, recreational use of the site and the river, and ensuring that the remediation program chosen will be carried out in its entirety and as intended. We believe Alternative 4 addresses the many remediation needs of the site, and endorse it as an appropriate remedy, subject to the concerns expressed here.

We wish to thank Pfizer for its continuing efforts to educate and involve the public in both understanding the breadth and complexity of the contamination and in fashioning the most appropriate remediation strategy. We find the company's outreach efforts have been sincere and effective. Tours of the site have been open to the public. In 2001, I was able to arrange for a site visit for Yale School of Forestry and Environmental Studies graduate students. The opportunity for graduate students to use the plant to study corporate remediation efforts has continued annually since. Pfizer's willingness to allow such access to the site is commendable.

1. The remediation plan calls for the creation of structures and engineering facilities. This effort will succeed only if resources are allocated to the ongoing operations, monitoring and maintenance which will be necessary during the lifetime of the remediation efforts. We wish to emphasize this concern at the outset.
2. We are concerned about the timing of the dredging of tidal flats 1 and 2 and the south creek. We have been involved in efforts to encourage the return of anadromous fish for spawning upstream. The dam on the river at Hanover Pond in Meriden now has a fish ladder. There will be one in the near future at Wallace Dam in Wallingford. Pending that new facility, we annually use 16' seine nets to capture shad, alewife and herring and carry them above the dam. This year, we transferred over 5,000 fish.

As some contaminants will inevitably be released from the sediments to the water column during the dredging operations, we ask that the dredging operations not take place during the adult spring migration upriver (late April to early June) and the run of the fry to the sea downstream. We look to DEP's expertise to identify these target periods, as well as the spawning times of other resident species.
3. Cleansing of brownfields and placing the land back into productive use is an important public policy goal. The west side of the property will be remediated and prepared for low impact re-use. We approve of this, as recycling old sites is a wise use of land. As the plan provides, Environmental Land Use Restrictions must be placed on the property. These restrictions must be recorded on the town land records.
4. The site is an extraordinary and unique venue on the edge of the river. Plans call for public access to the property. We appreciate the company's willingness to include such access. Coupled with the habitat restoration, we expect the site to become a highly valued and visited destination. We are concerned, however, that access will be available only on request, and only if the key holder can be found. We ask that unlocked access to the public portions of the site be made freely available as soon as the remediation process has rendered it safe for the public to visit. Trails, river side outlooks, birding and wildlife study, and other recreation should be provided, but should not interfere with efforts to restore wildlife and habitat.
5. Plans are underway in three municipalities to create an extensive linear trail along the Quinnipiac River. The trail design places the trail in the western portion of the site. We strongly urge that the plan provide for this trail, and that it be connected with onsite nature trails.
6. We have for years tried to find canoe and kayak launch sites for the public along the river. It has been a difficult project. There are several places at the site which could serve as launch sites in all tidal conditions. We ask that the plans include a designation for such a launch, with road access provided from the site entrance to the river for car top access.
7. The plans call for extensive habitat restoration, including creation of grasslands, historically present on the sand plain of the lower Quinnipiac. While such restoration can be difficult and at times problematic, we applaud their inclusion in the plans, and feel that such work will add significantly to the environmental value of the site.

8. Alternative 4 calls for minimal transport offsite of contaminated soil. We find this appropriate because the planned remediation will either neutralize the toxic material or sequester it from human contact, wildlife contact, and discharge to the river. Transport of large quantities of soil can be expensive. It merely moves the toxic material to another location, and can create opportunities for mobilization of the toxic material and release to the environment.

9. We are very concerned that financial resources be secured to cover the complete cost of the selected remediation strategy. Well-made plans, best intentions and good faith are a great starting point, but reserving the financial resources to complete the job is a necessity. While we wish the company all the best, we are uncomfortable with this effort tied to the corporate fortunes of Pfizer. The history of environmental remediation, including other sites on the Quinnipiac, is replete with stories of excellent plans never carried to completion. We call for creation of an escrow account, insurance policy, letter of credit, corporate guarantee, or surety bond to make sure the funds are there for the many years it will take to complete the job.

10. Species of concern are mentioned in the plan. In recent years, the osprey population along the river has been growing substantially, helped by pesticide bans and QRWA's nest platform construction. Bald eagles have also been sighted on a regular basis. These two species must be added to the list. They cannot thrive without an uncontaminated food source.

11. We want to ensure that monitoring of progress to ensure its completion will be incorporated in the plan. Monitoring records should be made available to the public on a periodic basis, either through a website, the town of North Haven, or the DEP.

12. We are concerned that the site be protected from extensive flooding. Flooding in many areas has become more extensive and frequent than obsolete FEMA maps would predict. This trend will intensify as global warming changes our climate, sea level, and precipitation patterns¹. The plans incorporate rainwater handling from serious storm events. As a significant flood could inundate the site with devastating consequences for the remediation efforts, the possibility of such an event must also be incorporated in the plans.

13. Finally, we are concerned about planning for the eventuality that the company may deem further operation of the groundwater treatment plan unnecessary, as the concentration of contaminants steadily declines. While this may be covered under the site's NPDES discharge permit, we want to ensure that such a future determination will be handled appropriately.

In sum, we credit Pfizer for its continuing efforts to remediate the site during the Corrective Measures Study period, and its extensive efforts to communicate with the public. This is a site which was never operated by Pfizer, but for which it has now has legal responsibility as a result of its acquisition of Pharmacia. We believe Alternative 4 represents an appropriate strategy for remediation of the site. We have concerns, detailed here, and urge EPA and DEP to make sure they are incorporated in the final plan. We eagerly look forward to the property's transformation to a healthy ecological venue for wildlife and human recreation, and to future collaborations with Pfizer to see this to fruition.

¹See The Impacts of Climate Change on Connecticut Agriculture, Infrastructure, Natural Resources and Public Health, CT DEP, April 2010