STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

February 27, 2015

VIA E-MAIL and U.S. MAIL

Mr. James Saric
Remedial Project Manager
United States Environmental Protection Agency Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3511

Dear Mr. Saric:

SUBJECT: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site, Natural Resource Damage Assessment (NRDA)

The NRDA Trustees for the Kalamazoo River Environment [Michigan Departments of Environmental Quality (MDEQ) and Natural Resources (MDNR), the Michigan Attorney General (MDAG), the United States Fish and Wildlife Service (USFWS), and the National Oceanic and Atmospheric Administration (MOAA)] continue to work cooperatively with the United States Environmental Protection Agency (USEPA) to minimize the effects of response activities on the natural environment and to provide input on restoration actions upon their completion. Looking forward to remediation for the next river reach areas on the Kalamazoo River, the Trustees continue to envision a coordinated remedial and restoration approach that protects and enhances the natural resources associated with the river and have developed the attached document, "Kalamazoo River Remedial and Restoration Objectives, January 2015" to provide a framework for our continued coordination.

The Trustees look forward to engaging in dialog with the USEPA as response actions are contemplated for the areas near the Otsego City and Township Dams. As we have discussed recently, the Trustees are preparing the Programmatic Restoration Plan and Environment Impact Assessment planning process for the Kalamazoo River Environment which, upon completion, will allow the Trustees to be able to provide resources for restoration projects associated with the Kalamazoo River. We would like to participate as stakeholders in discussions regarding dam removals or other significant projects associated with the response program.

We look forward to further discussion of our goals and objectives and will be contacting you to participate in future meetings involving upcoming remedial and restoration actions.

Sincerely,

Judith Alfano

Judith Alfano
Lead Administrative Trustee
517-241-5061

Attachment

cc: Mr. Todd Goeks, NOAA
Ms. Laurie Lee, NOAA
Ms. Jessica Mistak, MDNR
Ms. Julie Sims, NOAA
Ms. Polly Synk, MDAG
Ms. Mary Lynn Taylor, United States Department of Interior
Ms. Lisa Williams, PhD, USFWS
Mr. Paul Bucholtz, MDEQ

Kalamazoo River Remedial and Restoration Objectives

Natural Resource Damage Trustees
January 2015

The Kalamazoo River Environment (KRE) is a public trust resource, with substantial public land holdings along the river; including State managed Recreation and Game Areas from upstream of Plainwell to Saugatuck near the river mouth. Natural resource Trustees seek to restore the KRE to baseline conditions in conjunction with remediation of releases of polychlorinated biphenyls (PCBs) associated with historic paper waste discharges.

Restoring conditions as close as possible to those expected in a minimally disturbed system will improve system ecological functions, as well as dramatically improving recreational benefits and economic value to local communities that support and promote their riverfront and river uses. The Kalamazoo River, once restored, has sufficient publicly owned riparian property to provide substantial recreational opportunities for hunting, fishing, paddling, and many other activities, as well as supporting diverse flora and fauna native to the region. Intact natural corridors provide important migration and dispersal opportunities between the larger State-managed Game Areas and Recreation Areas for many species of birds and mammals.

PCB remediation along the Kalamazoo River will require remedial design and implementation that takes into consideration the historically dynamic nature of the Kalamazoo River to ensure that there is minimal risk of release of residual PCB back into the environment. The Trustees anticipate that PCB remediation may include removal of river islands, removal of in-stream bed and bank material, removal of deteriorated dams (as part of removal or as performed by the State) and dewatering former impounded areas that will each contribute to shifting river conditions within which the river will re-establish its channel. The river will establish width and depth characteristics suited to its discharge and variable flow conditions, sediment loading, and the geomorphologic setting through which it meanders. Given the potential magnitude of changes, the Trustees envision the need for a robust restoration component adjunct to remedial actions to provide timely rehabilitation of ecological benefits and natural resource services.

Remedial measures will need to create a clean corridor that provides a sufficiently wide buffer to accommodate river conditions that are likely to remain dynamic over time, and likely to include periodic channel migration and even island formation and channel braiding. The braided river reach below Plainwell was historically braided prior to dam construction and the river course through this reach is therefore, by nature, unpredictable. Similar dynamic conditions can be observed above the Morrow dam impoundment where many abandoned oxbows of the river are evident in the floodplain. In addition to removing PCBs that occur in the river channel, the focus for remedial decisions should be on removal of PCBs that have the potential to become mobilized

over time because they are within reach of the river. The Trustees are concerned that attempts that aim to control the river with armoring to protect PCB waste left in place, will likely lead to failure of the remedy, resulting in recontamination of the river. Extensive reliance on erosion control and channel armoring also contribute to further degradation, rather than improvement, of the river environment and as the Trustees and response agencies learned in Plainwell, will require substantial corrective action over time.

The Michigan Department of Natural Resources (MDNR) has particular interest in the dams on the Kalamazoo River, due to their ownership of the (former) Plainwell, Otsego Township, and Trowbridge dams. The dams were lowered to their sills in the mid 1970's and the MDNR would have removed the remaining dam structures in 1987, however, these resource management actions were precluded by the presence of large volumes of PCB-contaminated sediment that remains stored upstream of the dams. Since 1987, the baseline condition includes a free flowing river for these reaches. DNR is also working with the City of Otsego toward removal of the former Menasha, or City of Otsego Dam. Dams have many detrimental effects on water quality, fish and aquatic habitat and recreational uses of the river. Removal of PCB-contaminated sediments to an extent that dam removal is no longer precluded will facilitate removal of the beneficial use impairments for fish and wildlife that have been identified for the Kalamazoo River.

The Trustees intend to continue to work collaboratively with the United States Environmental Protection Agency and the responsible parties on evaluation of response alternatives, remedial design, removal oversight, and monitoring of areas subject to remedial actions to meet natural resource restoration objectives. The Trustees also envision a coordinated remedial and restoration approach that provides an environment safe for consumption of fish by humans and fish-eating animals such as bald eagle and mink within an expedited timeframe to the maximum extent practicable.