

**Attachment K**  
**Technical Assistance Services for Communities Comments**

**to the Comments on behalf of the Lower Passaic River Study Area  
Site Cooperating Parties Group on the Proposed Plan for the  
Lower Eight Miles of the Lower Passaic River Study Area Portion  
of the Diamond Alkali Superfund Site**

**Integral Consulting Inc. & AECOM**  
**July 2014**

Comments Regarding:

TASC 2014. Potential Economic Impacts of the Proposed Cleanup for the Lower Passaic River's Lower Eight Miles, prepared by Skeo Solutions/Technical Assistance Services for Communities (TASC) for the Passaic River Community Advisory Group (CAG). July.

1. The stated purpose of the report was to "provide information about the potential economic impacts of the proposed cleanup...." However, the TASC report focuses on the quantification of potential economic benefits with no attempt to quantify the potential negative economic impacts associated with the cleanup. Of the total 11 page report, less than 1 page is dedicated to a brief qualitative discussion of potential negative impacts. Thus, the report is incomplete and presents an unbalanced, biased and misleading accounting of the potential economic impacts associated with the proposed cleanup.
2. The TASC's economic analysis is modeled on the approach used by Region 2 to conduct an economic impact analysis for the Hudson River cleanup over 12 years ago. Now that the Hudson River cleanup is underway and actual economic impacts may be studied and quantified, it does not appear that the report's authors have made any attempt to verify the accuracy of this approach as it relates to making similar predictions for the Lower Passaic River.
3. The TASC analysis of economic benefits for the 8-mile Proposes Plan relies on gross, qualitative assumptions (e.g. estimates of total local expenditures) based on an analysis prepared for the Hudson River, without consideration of LPR site-specific factors. The applicability of this simplistic approach is not well demonstrated or supported, resulting in questionable findings, particularly considering the significant differences between the Lower Passaic and Hudson Rivers. Further, the report fails to discuss or quantify the nature and magnitude of uncertainty in these findings.
4. The TASC report incorrectly uses the term "jobs" (see Table 4) generated by the proposed clean-up. Table 4 implies that one person working for five years is equal to five jobs. What in fact such construction-type activities create is person-years of full-time equivalent labor. A total of 4,615 "jobs" from Table 4 would in fact be 900-950 persons working over a five years, including all direct, indirect and induced economic activity. This is 80% less than the TASC report's claim of 4,615 jobs.
5. Similar to the economic benefits analysis, the TASC's analysis of potential negative economic impacts relies on unsubstantiated statements from Region 2's 2002 socioeconomic impact analysis for the Hudson River Cleanup, inferring that similar

results could be expected for the LPR cleanup. However, there is no attempt to identify and understand fundamental differences between the Hudson River and LPR cleanups and the socioeconomic characteristics of the communities that would be impacted. As presented, the potential negative economic impacts resulting from the LPR cleanup are characterized as being relatively inconsequential, which is inaccurate and misleading. The major potential negative economic impacts to local communities and the surrounding region that are not assessed include, but are not limited to:

- Impacts due to increased delays on local roads, arterials and highways due to bridge openings; increased construction traffic and the associated delays to travelers; disruption to local communities and businesses due to queued vehicles, increased noise, and vehicular emissions, etc.
  - The potential impacts on passenger and rail bridge crossings, which would likely result in substantial impacts on regional commuter and intercity rail traffic, affecting thousands of travelers and disrupting train service and reliability.
  - Structural and operational impacts to local infrastructure (e.g. bridges, roads) due to increased construction traffic and the substantial duration of proposed construction activities
  - Air quality, noise, odor, visual impacts associated with construction activities
  - Impacts to waterway users during cleanup period
  - Decreased value/use of the waterway due to institutional controls
6. It is unclear how the discussion of best-management practices in this report relates to the quantification of potential economic impacts. While the establishment of a local procurement website/register is a potentially good idea, the authors have not examined how this may have a tangible effect on local economics as it does nothing to ensure work for local businesses. This report failed to study the actual success of the Hudson River's procurement website in generating local business and did not explore potentially more meaningful mechanisms for generating local business.
- Similarly, the discussion of impacts due to sediment processing facilities is unclear and appears out of place. No effort was made to examine meaningful potential economic consequences due to siting of sediment processing facilities. Further, the presumed siting of such facilities seems out of touch with Region 2's 8-mile proposed plan (i.e., there are no options under current consideration for siting a processing facility in riverside or industrial areas along the Lower Passaic River).
7. Considering that this study will likely influence public opinion, which in turn must be considered by Region 2 in its selection of a cleanup remedy for the site, it is incumbent upon the Region and its TASC contractor to consider and address the study deficiencies noted herein. Failure to do so could inadvertently influence public opinion to favor the proposed remedy without a fair and balanced analysis of both the economic benefits and negative economic impacts.