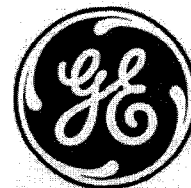


EXHIBIT 12

REPORT

*Habitat Assessment Report for
Candidate Phase 1 Areas
Hudson River PCBs Superfund Site*



General Electric Company
Albany, New York

November 2005

Exponent[®]

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

For riverine fringing wetlands unavoidably lost or adversely affected by the dredging project, the goal is to replace the functions provided by those wetlands, i.e., no net loss of functions. Functional replacement of riverine fringing wetlands will be accomplished by the replacement of the riverine fringing wetlands in their original locations, to the extent practicable and appropriate, consistent with the remedy. For locations where it is not practicable or appropriate to replace the wetland in its original location, and where it is determined appropriate by USEPA to do so, additional mitigation activities will be undertaken in other dredge areas to replace the lost function of that wetland.

For submerged aquatic vegetation (SAV) beds, the replacement of SAV beds will be dictated by the post-dredging river bathymetry (depth) and other factors that control the occurrence of SAV beds (e.g., current velocity, light availability) within the project area. Where water depths and controlling factors support the replacement of SAV beds, the goal is to replace those beds. Consistent with agreements between GE and USEPA, areas in the project area that supported SAV beds prior to dredging and backfilling will be evaluated to determine if the resulting water depth has increased to a point where these beds would no longer be supported. These areas will be evaluated to determine if placement of additional backfill would reduce the water depth so that SAV beds would be supported. Additional backfill, up to 15% of the total volume estimated during design to be placed as part of the entire project (1 foot over all dredge areas), will be allocated for creation of aquatic vegetation beds.

As stated in the HDA Work Plan, monitoring of the reference areas after the completion of the remediation will allow for modifications of the "bounds of expectation" for the measured parameters. Post-dredging comparisons of those parameters in the dredged areas to those in the reference area data set (i.e., parameters measurements taken in non-target areas before and after dredging, and in target areas before dredging) will provide the primary basis for judging the success of the habitat replacement and reconstruction program. The specific parameter measurements taken for each habitat type will be used to develop FCIs for the relevant functions for that habitat (as listed in Table 2 of the HDA Work Plan). The habitat replacement and reconstruction program will be designed to return the overall distribution of the relevant FCI parameters within the dredged areas to be similar to the overall distribution of such parameters in the habitat-specific reference areas, accounting for habitat size. It is anticipated that comparisons of the range of conditions in reference and remediated areas will be made by statistical tests appropriate for the collected data. A "spatially-weighted average" and use of negative null hypotheses are possible techniques that will be considered. The appropriate spatial scale for these comparisons will be determined by the data, and may consist of comparisons on a reach basis or on an overall river section basis. The spatial scale for these comparisons and the specific statistical techniques to be used in the