



HOUSATONIC REST OF RIVER MUNICIPAL COMMITTEE

December 8, 2022

Dean Tagliaferro, EPA Project Manager
GE-Pittsfield/Housatonic River Site
Boston, MA
Submitted via email to R1Housatonic@epa.gov

Re: Comments on the *Supplemental Phase IA Cultural Resources Assessment Report*

Dear Mr. Tagliaferro:

The Housatonic Rest of River Municipal Committee (the Committee) respectfully submits the following comments on the *Supplemental Phase IA Cultural Resources Assessment Report* (hereafter referred to as the 2022 Report). The 2022 Report is an update to the Initial Phase 1 Cultural Resources Assessment Report completed in 2008, which presented all the background data available as of that date. The 2022 Report focuses on identifying information that became available in the intervening 14 years.

While the 2022 Report generally adheres to the requirements of the Revised Final Permit as well as the Statement of Work (SOW) the 2022 Reporting is lacking in certain areas. As stated within the comments submitted by the Committee on the *Supplemental Phase IA Cultural Resources Assessment Work Plan* on March 28, 2022, there appears to be sufficient supporting documentation to proceed with more definitive field assessments of cultural resources rather than relying solely on continuing the desktop evaluation. It is also important to recognize that the Overall Strategy & Schedule for Implementation of the Corrective Measures (OSS) has not been finalized and delaying field investigations could have greater implications on the schedule for cleanup.

In addition, as stated within previous comments submitted by the Committee, it is important to ensure that “community-valued” properties are captured. A thorough community review and identification of important properties should be conducted since the public can provide more unique insights into property use and history. The Committee’s comments on the *Supplemental Phase IA Cultural Resources Assessment Report* are enclosed as Attachment A.

Sincerely,
The Housatonic Rest of River Municipal Committee

Enclosure: Attachment A - Housatonic Rest of River Municipal Committee Comments on the Supplemental Phase IA Cultural Resources Assessment Report

Enclosure: Attachment B - Technical Assistance Services for Communities Comments, November 30, 2022

ATTACHMENT A
HOUSATONIC REST OF RIVER MUNICIPAL COMMITTEE
Comments on the Supplemental Phase IA Cultural Resources Assessment Report
GE/Housatonic River - Rest of River

The *Supplemental Phase IA Cultural Resources Assessment Report* (hereafter referred to as the 2022 Report) is intended to describe the additional desktop reviews, literature searches and consultations to update the Initial Phase 1 Cultural Resources Assessment Report completed in 2008 (hereafter referred to as the 2008 Report). It is also intended to describe the updated archaeological sensitivity modeling conducted of the ROR areas to assess their potential to contain unidentified potentially-significant cultural resources, and to identify known or suspected historic structures that could be affected by remediation or support activities (to the extent of how remedial action will affect these resources as known at this time). The 2022 Report is generally conceptual in its approach and indicates that additional data will be needed to complete the Phase 1 cultural resources investigation, which is scheduled to occur during the remedial design of each Remediation Unit. The references cited in the 2022 Report rely heavily on references previously summarized in the 2008 Report. There are approximately seven new resources referenced in the 2022 Report indicating that very little new information has been obtained. It is important to summarize if any conclusions from the 2008 Report were amended based on the additional work. In addition, it would be helpful to the reader for the 2022 Report to point out the differences between the original and updated reports.

The 2022 CRA Report does not vary significantly from the 2008 Report, which is a publicly-available document. However, the 2022 Report redacts sensitive features which are clearly described in the 2008 Report. Given that this document is very similar to the 2008 Report, it is unclear why information has been removed from 2022 Report.

In addition, the Committee offers the following comments:

1. GE should summarize the changes that have been identified between the 2022 Report and the 2008 Report so that the community can clearly understand how the current update varies from the initial report.
2. Definitive in-field verification of the presence or absence of cultural resources is not included within the 2022 Report. The 2022 Report indicates that much of the relevant information is not known at this time and that to the extent that such areas will be assessed for cultural resources at a later time.

In the comments on the *Supplemental Phase IA Cultural Resources Assessment Work Plan* submitted by the Committee on March 28, 2022, the Committee commented that it appeared sufficient information exists (in particular, for Reach 5A) to initiate more definitive in-field studies and that GE should proceed with more definitive analysis methods (field-spade surveys) immediately to determine the presence/absence of resources in known remediation units where enough information is available to characterize the occurrence of cultural resources.

In addition to the identified river stations within Reach 5A, there are areas associated with the Columbia Mill Dam (Reach 7B) and the former Eagle Mill Dam (Reach C) where the planned dam removals may affect areas with high archaeological sensitivity (as summarized from the 2008 Report). In the interest of keeping the remedial action schedule on track, it seems appropriate to conduct the in-field model sensitivity analysis rather than using this next field effort as a preliminary step to the predesign investigation sampling.

GE should immediately initiate the next steps in definitive analysis (field studies to determine archaeological sensitivity verification) within Reach 5A (at a minimum) to streamline the next steps for remedy development.

3. In the comments on the *Supplemental Phase IA Cultural Resources Assessment Work Plan* submitted by the Committee on March 28, 2022, the Committee requested EPA to address Applicable or Relevant and Appropriate Requirement (ARAR) consultation requirements that could substantially affect the proposed Reach 5A remedy construction schedule and proceed as needed to keep the projected RD/RA schedule for Reach 5A on schedule. The notification process to state, tribal or federal authorities that may be required can be a time consuming process. The 2022 CRA Report does not reference how agency and other cultural resource trustee coordination will be accomplished if sites will be affected by a remedial action or whether the state, tribal or federal agencies will have a chance to partake in, review or contribute to follow-on cultural resource assessments.

GE and EPA should coordinate to ensure that cultural resource assessments of remedial action impacts are being tracked to comprehensively share the information with entities that are responsible and invested in the fate of these resources.

4. In the comments on the *Supplemental Phase IA Cultural Resources Assessment Work Plan* submitted by the Committee on March 28, 2022, the Committee raised concern that site 19BK166 has historic notes of a 1783 map that depicts an "Indian Burial". The Committee stated that verification of this site as a grave site needed to be determined as soon as feasibly possible to determine potential impacts on this historic site. Since 1990, the Native American Graves Protection and Repatriation Act (NAGPRA) has provided for the repatriation and disposition of certain Native American human remains, funerary objects, sacred objects and objects of cultural patrimony. By enacting NAGPRA, Congress recognized that human remains of any ancestry "must at all times be treated with dignity and respect."

The 2022 Report does not indicate that any further evaluation or verification of site 19BK166 has begun. GE should begin further evaluation of site 19BK166 as soon as possible to effectively address NAGRPA requirements and avoid impacting this resource during Reach 5A Remedial Design/Remedial Action, and/or verify the presence of a potentially significant cultural resource.

5. The 2022 CRA Work Plan indicated that this document will be prepared to meet the standards of the Massachusetts Historical Commission (MHC) reporting guidelines. As per the CRA Work Plan, the

2022 CRA Report was to include an “abstract (consistent with the State Archaeologist’s memorandum on archaeological abstracts) introduction, background research methods... and results of the repositories visited and knowledgeable individuals consulted.” Most of these elements are contained within the 2022 CRA Report. However, it does not specifically provide any detailed results from the newly-acquired information gathered for this document. The 2022 CRA Report would benefit from the addition of an abstract as per standard MHC reporting guidelines. In addition, the document indicates that a field reconnaissance was updated in August 2022 that involved inspections focused on Reach 5 with systematic vehicle inspection and pedestrian checks of the remaining sections of the ROR. The 2022 CRA Report does not follow MHC reporting requirements (refer to 950 CMR 70.14 (3) Site Examination level Field Investigation) which state that this document should include maps of the fieldwork and sites visited. The 2022 CRA Report states that the Geographic Information Systems-based archaeological sensitivity maps of the projects were updated. However, a comparison of these maps (Figure 6 to Figure 35) to the same maps provided in the 2008 CRA Report shows that there are no changes, indicating that the field results did not yield any new information.

GE should include a brief discussion of the new information that was revealed during this document’s research efforts and a summary of any changes to the delineated Archaeological Sensitivity Maps, etc.

6. Although the 2022 Report identified the need for a detailed geomorphological analysis of the floodplain landforms to help determine their age and integrity, the 2022 Report does not evaluate if these channel changes influence the archaeological sensitivity mapping. It is possible that “historic” archaeological sensitivity maps may vary from “current” archaeological sensitivity maps. Since the sensitivity maps are intended to be used to identify areas that require further, more definitive in-field surveys prior to remedial action, it is important to develop comprehensive time-integrated sensitivity maps to be sure all areas with high – medium prehistoric archaeological potential be known and mapped prior to remedial design/remedial action.

GE should evaluate the historic river channel information presented in the 2022 Report to map historic archaeological sensitivity maps to have a comprehensive geospatial layer of prehistoric archaeological potential information from which to evaluate possible remedial action effects.

7. There is no mention within the 2022 Report or preceding documents of the process that will be undertaken during construction if relics and/or specimens are encountered. GE should describe within the 2022 Report the process that will be undertaken during construction if relics and/or specimens are encountered. At a minimum, the 2022 Report should state that any relic or specimen revealed during construction will be addressed following standard disposition of relics and specimens guidance as defined in the Archaeological Data Preservation Act. The Act recommends that encountered relics and specimens be reviewed to determine ownership and the most appropriate repository. Federal and state agencies, tribes, educational and scientific organizations, private institutions and qualified individuals should be consulted to identify ownership.

8. As recognized within the 2022 Report, there is a need to evaluate potential underwater cultural and archaeological resources for certain ROR reaches. The Massachusetts Board of Underwater Archaeological Resources (BUAR) is responsible for addressing submerged cultural and archaeological resources. If underwater archaeological resources are identified during construction (remedial action), any encountered "Isolated Find"/artifact discovered must be reported. GE should describe within the 2022 Report which procedures will be followed to report an "Isolated Find".
9. GE and EPA should evaluate the likelihood the climate change will have implications that will affect the Historic Archaeological APE.



Technical Assistance Services *for* Communities GE-Pittsfield/Housatonic River Site Comments on Supplemental Phase 1A Cultural Resources Assessment Report November 30, 2022

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TASC/CI Support)

Technical Direction: R1 2.7.14 GE Pittsfield

**Technical Assistance Services for Communities (TASC)
Comments on GE-Pittsfield/Housatonic River Site –
Supplemental Phase 1A Cultural Resources Assessment Report
for the Housatonic Rest of River,
October 2022**

Introduction

This document provides TASC comments on the GE-Pittsfield/Housatonic River Site – Supplemental Phase 1A Cultural Resources Assessment Report (2022 CRA Report). This document is for the Berkshire Regional Planning Commission (BRPC) and municipalities to use as they develop comments to share with the U.S. Environmental Protection Agency (EPA). TASC does not make comments directly to EPA on behalf of communities. This document is funded by EPA’s TASC program. The contents do not necessarily reflect the policies, actions or positions of EPA.

Pursuant to the Revised Resource Conservation and Recovery Act (RCRA) Permit Modification (Revised Final Permit) issued by EPA to the General Electric Company (GE) on December 16, 2020, for the Rest of River (ROR) portion of the GE-Pittsfield/Housatonic River site, GE prepared a Supplemental Phase 1A Cultural Resources Assessment Work Plan (January 17, 2022). The 2022 CRA Report describes the process and activities that GE proposed to conduct to begin to identify potentially-affected ROR areas that contain known cultural resources or have a high potential to contain such resources, as well as upland areas with known or suspected historic structures that might be indirectly affected by project activities. EPA conditionally approved the work plan on April 20, 2022. The 2022 CRA Report describes the supplemental activities completed by GE (through its consulting archaeologists at AECOM). It presents the results and describes the next steps in the cultural resources investigation process in the ROR area. The Upland Disposal Facility (UDF) and UDF support area are subject to a separate cultural resources assessment (CRA).

Summary

The October 2022 Supplemental Phase 1A Cultural Resources Assessment (CRA) Report (the Report) has nine sections and two appendices:

- Introduction and Overview Research.
- Environmental Setting.
- Cultural and Historical Contexts.
- Results of Background Research.
- Analysis of River Channel Movements in Reaches 5 and 6.
- Archaeological Sensitivity Model Results.
- Summary of Cultural Resources by Reach.
- Next Steps.
- References.
- Appendix A – Previously Recorded Archaeological Sites [Redacted to Protect Site Integrity].
- Appendix B – Analysis of River Channel Movements.

The 2008 Initial Phase 1 CRA Report (2008 CRA Report) presented all the background data available as of that date. The 2022 update focuses on identifying information that became available in the intervening 14 years. It describes structural resources known to be associated directly with the Archaeological Area of Potential Effects (APE). It also summarizes the extent of known nearby historic structures. The report does not further define the exact limits of the Historic Architectural APE or present a comprehensive inventory of all historic structures in the area. Once the specific locations to be remediated and the specific locations of support areas have been identified, this information can be used to refine the limits of the Historic Architectural APE and to identify the extent of any survey measures needed to further identify historic structures. More data will be needed to complete the Phase 1 cultural resources investigation. Data needs will depend on the specific locations of the remediation activities, as well as the locations of access roads and staging areas. During the remedial design process, GE will submit a work plan for a Phase 1B cultural resource survey for each Remediation Unit. The Phase 1B work plan will propose additional activities, including field investigations to determine whether the remediation and support activities for that Remediation Unit, as designed, will affect potentially significant cultural resources.

TASC Comments

TASC reviewed the 2022 CRA Report and compared it to the 2008 CRA Report. Both reports provide similar content. TASC notes it would be helpful to the reader for the 2022 CRA Report to point out the differences between the original and updated reports. The 2022 CRA Report is generally conceptual in its approach. It says that additional data will be needed to complete the Phase 1 cultural resources investigation, which is scheduled to occur during the remedial design of each Remediation Unit. GE consultants communicated with a representative of the Wampanoag Tribe of Gay Head (Aquinnah) and the Stockbridge Munsee Band of Mohican Indians. They also made attempts to connect with the Schaghticoke Tribal Nation and the Schaghticoke Indian Tribe in Connecticut but did not receive a response.

TASC provides comments that generally focus around:

- Whether sufficient information already exists to warrant the next steps in the CRA process.
- If there are opportunities to make the 2022 CRA Report clearer in defining its findings, as they differ from the 2008 CRA Report.
- The need to identify the process that will be taken if/when relics are encountered during remedial design/remedial action
- That it may be important to evaluate the historic river channel morphology changes to the Historic Architectural APE area (presented in Section 5 and Appendix B). This information could be used to prepare comprehensive time-integrated sensitivity maps. The maps would be used to ensure all areas with high – medium prehistoric archaeological potential be known and mapped prior to remedial design/remedial action. and.

Specific TASC comments are:

1. The 2022 CRA Report emphasizes that this version of the report is for public release. The maps within the 2022 CRA Report do not show specific locations of archaeological sites. It also redacts similar restricted information in the text and eliminates an appendix listing the previously-recorded archaeological sites. However, the 2022 CRA Report does not vary significantly from the 2008 CRA Report, which is a publicly-available document. Sensitive features redacted from the 2022 CRA Report are clearly described in the 2008 CRA Report. Given that this document is very similar to the 2008 CRA Report, it is unclear why information has been removed from 2022 report.

The community may want to ask why so much information in the 2022 CRA Report has been redacted, given that it appears much of the same information is available in previously-provided public documents.

2. The 2022 CRA Report is intended to describe the additional desktop reviews, literature searches and consultations identified in the 2022 Supplemental Phase 1A Cultural Resources Assessment Work Plan (CRA Work Plan) to update the 2008 CRA Report (pdf page 13). It is also supposed to describe the updated archaeological sensitivity modeling conducted of the ROR areas to assess their potential to contain unidentified potentially-significant cultural resources, and to identify known or suspected historic structures that could be affected by remediation or support activities (to the extent of how remedial action will affect these resources as known at this time). Comparison of this document to the 2008 CRA Report indicates that the information gained from the recent research and field efforts did not appear to affect the previous conclusions. For instance, the Archaeological Sensitivity Maps in Figure 6 to Figure 34 (pdf page 40 to pdf page 68) are the same maps as those in the 2008 CRA Report. In addition, the references cited in this recent document rely heavily on references previously summarized in the 2008

document. There are about seven new resources called out in the 2022 document indicating that very little new information was obtained for this document. It is important to summarize if any conclusions from the 2008 CRA Report were amended based on the additional work.

The community may want to ask EPA if this document could summarize the changes that have been identified between the 2022 CRA Report and the 2008 CRA Report (refer to Comment 6 below) so that the community can understand clearly how the current document varies from the original 2008 CRA Report.

3. TASC provided comments on the CRA Work Plan that apply to this document as well. Similar to comments provided for the CRA Work Plan, the 2022 CRA Report continues to delay definitive in-field verification of the presence or absence of cultural resources. The document indicates “much information relevant to evaluating the specific cultural impacts of the Rest of River Remedial Action is not known at this time – notably, the specific locations to be remediated within many areas (including the Reach 5B and 5C channel, Reach 5A and 5B riverbanks, backwaters, Wood Pond and Rising Pond... therefore...to the extent that such areas are not covered by this report, they will be assessed for cultural resources at a later time” (pdf page 13). As stated in the TASC comments for the CRA Work Plan, there appears to be enough information for Reach 5A (at a minimum) from which to begin the in-field verification process. In order to accomplish the Revised Final Permit Performance Standards (pdf page 24 and pdf page 25), Reach 5A sediments and riverbank soils > 5 milligrams per kilogram (mg/kg) polychlorinated biphenyls (PCBs) are to be removed. The spatial depiction of areas with possible “high” occurrence for cultural resources in Reach 5A are shown on the Archaeological Sensitivity Maps in Figure 6 to Figure 9 of the document (pdf page 40 to pdf page 43). When these “high” occurrence of archaeological resources areas are compared to interpolated surface soil PCB concentrations in Reach 5A (Figure 2-3 of the Revised Pre-Design Investigation for Reach 5A Non-Residential Exposure Areas, pdf page 47), it becomes apparent that there are known areas likely to be remediated that are defined as having high archaeological sensitivity. The areas within Reach 5A where there is an overlap of having a high archaeological sensitivity and possible elevated PCBs > 5 mg/kg include river stations:
 - 0+00 – 20+00.
 - 50+00 – 100+00.
 - 125+00 – 150+00
 - 180+00 – 190+00.
 - 210+00 – 220+00.
 - Around station 230+00.

In addition to the identified river stations within Reach 5A, there are areas associated with the Columbia Mill Dam (Reach 7B) and the former Eagle Mill Dam (Reach C)

where the planned dam removals may affect areas with high archaeological sensitivity (as summarized from the 2008 CRA Report) as follows:

- Reach 7A and Reach 7B have narrow strips of high potential terrain, primarily along the east side of the river, while Reach 7C and the upper end of Reach 7D also have narrow strips of prehistoric high potential. Although these areas are small in extent, their locations adjacent to former rapids in the river would have been prime spots for prehistoric fishing encampments.
- Downgradient areas such as the area between the Turnpike and South Lee (where there are extensive stretches of elevated, well-drained floodplain terraces) are areas that have high potential for containing sites. A concentration of recorded sites is located in this region. Four of these sites are located within the APE (19BK145, 19BK147, 19BK148 and 19BK156) and two more about the south edge of the APE (19BK146 and 19BK157). All include multiple Late Archaic, Early Woodland and Late Woodland components. Site 19BK146 was recommended as eligible for the NRHP (Macomber 1992:32) (pdf pages 64 and 65 of the 2008 CRA Report).

In the interest of keeping the remedial action schedule on track, it seems appropriate to conduct the in-field model sensitivity analysis (for example, for Reach 5A) sooner than later, rather than using this next field effort as a preliminary step to the Reach 5A predesign investigation sampling.

The public may want to ask EPA if sufficient information exists to warrant the next steps in definitive CRA analysis (field studies to determine archaeological sensitivity verification) within Reach 5A to streamline the next steps for remedy development.

4. TASC comments provided for the 2022 CRA Work Plan identified potential timely concerns associated with the notification process to state, tribal or federal authorities that may be required if recorded prehistoric sites are to be affected by forthcoming ROR remedial actions. Neither the 2022 CRA Work Plan nor the 2022 CRA Report mention how agency and other cultural resource trustee coordination will be accomplished if sites will be affected by a remedial action. Section 1.6 of the 2022 CRA Report briefly describes outreach to area tribes for the research accomplished in this document. However, there is no mention of whether the state, tribal or federal agencies will have a chance to partake in, review or contribute to follow-on cultural resource assessments.

The public may want to ask EPA if coordination of cultural resource assessments of remedial action impacts are being tracked to comprehensively share the information with entities that are responsible and invested in the fate of these resources.

5. The 2008 CRA Report and the 2022 CRA Work Plan both identified a surveyed site (19BK166) of potential historical significance. The site may require verification to

determine if the 1990 Native American Graves Protection and Repatriation Act (NAGPRA) is triggered by a potential remedial action.

As previously stated in TASC comments for the 2022 CRA Work Plan, “The community may want to ask EPA if further evaluation of site 19BK166 should begin as soon as possible to effectively address NAGRPA requirements and avoid impacting this resource during Reach 5A Remedial Design/Remedial Action, and/or verify the presence of a potentially significant cultural resource.”

6. The 2022 CRA Work Plan indicated that this document will be prepared to meet the standards of the Massachusetts Historical Commission (MHC) reporting guidelines. As per the CRA Work Plan, the 2022 CRA Report was to include an “abstract (consistent with the State Archaeologist’s memorandum on archaeological abstracts) introduction, background research methods... and results of the repositories visited and knowledgeable individuals consulted.” Most of these elements are contained within the 2022 CRA Report. However, it does not specifically provide any detailed results from the newly-acquired information gathered for this document. The 2022 CRA Report would benefit from the addition of an abstract as per standard MHC reporting guidelines. In addition, the document indicates that a field reconnaissance was updated in August 2022 that involved inspections focused on Reach 5 with systematic vehicle inspection and pedestrian checks of the remaining sections of the ROR. The 2022 CRA Report does not follow MHC reporting requirements (refer to 950 CMR 70.14 (3) Site Examination level Field Investigation) which state that this document should include maps of the fieldwork and sites visited. The 2022 CRA Report states that the Geographic Information Systems-based archaeological sensitivity maps of the projects were updated. However, a comparison of these maps (Figure 6 to Figure 35) to the same maps provided in the 2008 CRA Report shows that there are no changes, indicating that the field results did not yield any new information. TASC recommends that this abstract include a brief discussion of the new information that was revealed during this document’s research efforts and a summary of any changes to the delineated Archaeological Sensitivity Maps, etc.

The community may want to ask EPA if the 2022 CRA Report could be revised to include a standard/required abstract that summarizes the specific research and results from this document that differ from the previous 2008 CRA Report and that may affect forthcoming ROR remedial action.

7. Section 5 of the 2022 CRA Report presents an analysis of river channel movements in Reach 5 and Reach 6. The compiled maps and aerial photographs in Appendix B show the location and horizontal configuration of the Housatonic River channel during historic time periods. Conclusions from the document include that the upper portions of the ROR experienced larger and more abrupt shifts in the location of the Housatonic River channel from 1854 to 1904, while only slower, incremental migration was observed from 1942 to the present. The document states that these

results identify the need for a detailed geomorphological analysis of the floodplain landforms to help determine their age and integrity. However, the document does not evaluate if these channel changes influence the archaeological sensitivity mapping. The archaeological sensitivity maps are developed from the mapping of variables, including proximity to water source, type of soils (well drained to fairly well drained), slopes and amount of disturbance. These variables can be affected by the location of the flowing river channel. Therefore, it is possible that “historic” archaeological sensitivity maps may vary from “current” archaeological sensitivity maps. Since the ultimate goal for the sensitivity maps is to identify those areas requiring further, more definitive in-field surveys prior to remedial action, it seems important to develop comprehensive time-integrated sensitivity maps to be sure all areas with high – medium prehistoric archaeological potential be known and mapped prior to remedial design/remedial action.

The community may want to ask EPA if the historic river channel information presented in the 2022 CRA Report should be evaluated to map historic archaeological sensitivity maps to have a comprehensive geospatial layer of prehistoric archaeological potential information from which to evaluate possible remedial action effects.

8. As previously commented on, the 2008 CRA Report and the 2022 CRA Work Plan have not identified the methods to be used during construction that will address encountered relics and specimens. TASC recommends that this document at least state that any revealed relic or specimen during construction will be addressed following standard disposition of relics and specimens guidance as defined in the Archaeological Data Preservation Act. The Act recommends that encountered relics and specimens should be reviewed to determine ownership and the most appropriate repository. Federal and state agencies, tribes, educational and scientific organizations, private institutions and qualified individuals should be consulted to identify ownership.

The community may want to ask EPA if this document or future remedial design/remedial action work plan documents should incorporate a discussion of how recovered artifacts during construction will be addressed.

9. As recognized within the 2022 CRA Report, there is a need to evaluate potential underwater cultural and archaeological resources for certain ROR reaches. The Massachusetts Board of Underwater Archaeological Resources (BUAR) is responsible for addressing submerged cultural and archaeological resources. If underwater archaeological resources are identified during construction (remedial action), as per guidance provided by the Massachusetts BUAR, any encountered “Isolated Find” discovered in Massachusetts waters must be reported. An Isolated Find is an artifact displaced from its original archaeological context through erosions, water currents or other natural processes, or the result of random human deposition.

The community may want to ask EPA if the “Isolated Find” reporting procedures issued by the Massachusetts BUAR pertain to the forthcoming remedial actions.

10. GE recently issued the Sustainability and Climate Adaptation Plan for the Rest of River remedial action. One question about this Plan is if climate change-related impacts such as increased flooding and river flows would possibly affect media-impacted performance criteria for the cleanup. For instance, since Reach 5A river sediments are to be entirely removed, it may be prudent to determine if climate change flow conditions would affect the amount of river sediments to be addressed during remedial action. This would in turn affect the need to better understand the nature and extent of the archaeological sensitivity areas in relation to this revised footprint.

The community may want to ask EPA if the implications of climate change will affect the Historic Archaeological APE.

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Massachusetts BUAR Web page. <https://www.mass.gov/orgs/board-of-underwater-archaeological-resources>. Frequently Asked Questions. <https://www.mass.gov/service-details/buar-frequently-asked-questions>

MHC reporting guidelines (950 CMR 70.14). <https://www.mass.gov/doc/950-cmr-70-massachusetts-historical-commission/download>

USC 2006, Supplement 5, Title 16 – Conservation, Chapter 1A - Historic Sites, Buildings, Objects, and Antiquities, Subchapter I – General Provisions, Sec. 469 – Archaeological Data Preservation Act: Preservation of historical and archeological data threatened by dam construction or alterations of terrain. Pub. L. 86-523, §1, June 27, 1960, 74 Stat. 220; Pub. L. 93-291, §1(1), May 24, 1974, 88 Stat. 174. <https://www.govinfo.gov/app/details/USCODE-2011-title16/USCODE-2011-title16-chap1A-subchapI-sec469/context> and <https://www.gsa.gov/cdnstatic/ArchaeologicalDataPreservationAct.pdf>

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