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November 15, 2024

Mr. Joshua Fontaine
U.S. Environmental Protection Agency, New England Region
Five Post Office Square
Suite 100
Boston, MA 02109

Re: GE-Pittsfield/Housatonic River Site
Rest of River (GECD850)
Phase IB Cultural Resources Survey Work Plan for Reach 6

Dear Mr. Fontaine:

In accordance with Section II.H.15 of the Revised Final Permit issued by EPA for the Rest of River, Section 4.3.3.2 of the *Final Revised Rest of River Statement of Work*, and an August 30, 2024 proposed schedule approved by EPA on September 12, 2024, GE is submitting herewith for EPA's review and approval a *Phase IB Cultural Resources Survey Work Plan for Reach 6*, prepared for GE by AECOM.

Please let me know if you have any questions about this work plan.

Sincerely yours,

Robert G. Gibson
Senior Project Manager

Cc: (via electronic mail)
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John Kilborn, EPA
Christopher Ferry, ASRC Federal
Thomas Czelusniak, HDR Inc.
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Smitty Pignatelli, Town of Lenox
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Town Manager, Great Barrington
Town Administrator, Stockbridge
Town Administrator, Sheffield
Jim Wilusz, Tri Town Health Dept.
Brona Simon, Executive Director, Mass. Historical Commission (hard copy of report via FedEx and CD-ROM with Word file)
Edward Bell, Deputy State Historic Preservation Officer, Mass. Historical Commission (hard copy of report via FedEx,)
David S. Robinson, Mass. Board of Underwater Archaeological Resources
Jeffrey Bendremer, Stockbridge-Munsee Band of Mohican Indians
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)
Chuck Kilson, Schaghticoke Tribal Nation
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Public Information Repository at David M. Hunt Library in Falls Village,
CT GE Internal Repository

November 2024
Housatonic River – Rest of River

AECOM

Phase IB Cultural Resources Survey Work Plan for Reach 6

Prepared for General Electric Company
Pittsfield, Massachusetts

November 2024
Housatonic River – Rest of River

Phase IB Cultural Resources Survey Work Plan for Reach 6

Prepared for
General Electric Company
1 Plastics Avenue
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Prepared by
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TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
ARARs	Applicable or Relevant and Appropriate Requirements
CD	Consent Decree for GE=Pittsfield/Housatonic River Site
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cm	centimeter
CRA	Cultural Resources Assessment
CRS	Cultural Resources Survey
EPA	U.S. Environmental Protection Agency
Final Revised SOW	*Final Revised Rest of River Statement of Work*
GE	General Electric Company
GIS	Geographic Information System
m	meters
MHC	Massachusetts Historical Commission
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
PCBs	polychlorinated biphenyls
RCRA	Resource Conservation and Recovery Act
Revised Final Permit	Revised Final Resource Conservation and Recovery Act Permit Modification
ROR	Rest of River
RU	Remediation Unit
SHPO	State Historic Preservation Office
SRHP	State Register of Historic Places
STP	shovel test pit

Abstract

This document, submitted on behalf of the General Electric Company (GE), constitutes a work plan for a Phase IB Cultural Resources Survey (CRS) of portions of Reach 6 of the Housatonic River Rest of River (ROR) in Pittsfield, Massachusetts that (a) will be affected by remediation activities to address polychlorinated biphenyls (PCBs) and/or support activities such as access roads and staging areas and (b) contain or have a high potential to contain cultural resources. This work plan is submitted in connection with and support of GE's design of a remedial action for Reach 6 under a revised permit issued by the U.S. Environmental Protection Agency (EPA). This plan builds on background data provided in GE's Revised Supplemental Phase IA Cultural Resources Assessment (CRA) Report for the ROR, submitted to and approved by EPA in March 2023. For purposes of this work plan. the locations and character of the anticipated remediation and support activities in Reach 6 are based on GE's Conceptual Remedial Design/Remedial Action (RD/RA) Work Plan for Reach 6, which was previously submitted on October 31, 2024.

This work plan presents updated definitions of the Archaeological and Historic Architectural Areas of Potential Effects in the Reach 6 areas covered by the Conceptual RD/RA Work Plan. It provides a description of the aquatic and terrestrial areas where intensive field surveys will be conducted as part of the Phase IB CRS. It describes the proposed methods to be used for those surveys, and it concludes with a description of the anticipated schedule and reporting for Phase IB CRS activities in Reach 6 and an overview of possible subsequent CRA activities.

1 Introduction and Background

1.1 Introduction

On December 16, 2020, pursuant to the 2000 Consent Decree (CD) for the GE Pittsfield/Housatonic River Site, the U.S. Environmental Protection Agency (EPA) issued to the General Electric Company (GE) a final revised modification of GE's Resource Conservation and Recovery Act (RCRA) Corrective Action Permit (Revised Permit) for the Rest of River (ROR) portion of that site. The ROR is defined as that portion of the Housatonic River and its backwaters and floodplain (excluding Actual/Potential Lawns as defined in the CD) located downstream of the confluence of the East and West Branches of the Housatonic River (the Confluence). The Revised Permit set forth a Remedial Action selected by EPA to address polychlorinated biphenyls (PCBs) in the ROR. Pursuant to that Revised Permit, GE submitted a *Final Revised Rest of River Statement of Work* (Final Revised SOW; Anchor QEA et al. 2021) on September 14, 2021, specifying the deliverables and activities that GE will conduct to design and implement the ROR Remedial Action. That submittal was approved by EPA on September 16, 2021.

Pursuant to Section II.H.15 of the Revised Permit and Section 4.2.1.7 of the Final Revised SOW, GE submitted a *Revised Supplemental Phase IA Cultural Resources Assessment (CRA) Report* (Revised Phase IA CRA Report; AECOM 2023) for the ROR area on March 10, 2023, with a public release version submitted on March 14, 2023. That report was approved by EPA on March 27, 2023. The Revised Phase IA CRA Report described the process and activities that GE had conducted to identify potentially affected ROR areas that contain known cultural resources or have a high potential to contain such resources. That report also described upland areas with known or suspected historic structures that might be indirectly affected by project activities.

The Revised Phase IA CRA Report stated that the next step in the process, as provided in Section 4.3.3.2 of the Final Revised SOW, is to conduct a Phase IB Cultural Resources Survey (CRS) of portions of the ROR that will be affected by remediation actions and support activities such as access roads and staging areas and contain or have a high potential to contain cultural resources.[1] The Phase IB CRS Work Plan for Reach 5A, the first ROR Remediation Unit (RU) subject to remediation, was initially submitted on September 28, 2023, and a revised version was submitted on March 19, 2024 and approved by EPA on April 2, 2024. Field CRS studies for Reach 5A were completed between May and September of 2024 (except at one property where the remedial footprint is being reevaluated) , and a report of those studies is currently in preparation.

[1] The term "Phase IB" is appropriate under the federal program governing the Revised Permit activities, but it is not recognized terminology by the Commonwealth of Massachusetts. For archaeological resources, the Phase IB study is equivalent to an intensive archaeological survey as defined by Massachusetts Historical Commission (MHC) guidelines, but it will investigate historic structures as well.

Reach 5A was the first RU to be addressed because it is the most upstream reach in the ROR. GE's *Final Revised Overall Strategy and Schedule for Implementation of the Corrective Measures* (Anchor QEA 2022) states that sediment removal in Reach 6, which includes Woods Pond and is farther downstream, will be conducted in parallel with sediment/soil removal in Reach 5A such that sediment removal in both reaches will be completed at approximately the same time. However, capping in Reach 6 will be delayed until after all sediment and soil removal, backfill/capping, and placement of sediment amendments have been completed in all upstream RUs (i.e., Reaches 5A, 5B, and 5C).

Reach 6 is located in Lenox and Lee, Massachusetts, and is shown on Figure 1. As specified in Section II.B.2.e of the Revised Permit, remediation in Woods Pond in Reach 6 will involve removal and engineered capping of sediments in the pond as needed to achieve a post-capping minimum water depth of six feet as measured from the crest of Woods Pond Dam, except in nearshore areas, where the slope from the shore to the six-foot water depth is to be as steep as possible while also being stable. In areas with water depth greater than six feet prior to remediation, sufficient sediment will be removed to allow for the placement of an engineered cap so the final grade is equal to or deeper than the original grade. Remediation in Reach 6 will also include removal of sediments in the outlet channel from Woods Pond and from adjacent Valley Mill Pond, which is connected to the river by a culvert and raceway just upstream from the dam. In addition, the Reach 6 remediation will include removal and replacement of floodplain soils to the extent required by the applicable Performance Standards in the Revised Permit.

On October 31, 2024, GE submitted to EPA a Pre-Design Investigation Summary Report for Reach 6 (Reach 6 PDI Report; Anchor QEA 2024) describing the pre-design investigation (PDI) activities conducted by GE in Reach 6 in accordance with the Revised Permit to obtain the data to design the remedial activities for this portion of the ROR. This was accompanied by a *Baseline Restoration Assessment Report for Housatonic Rest of River Reach 6* (Reach 6 BRA Report; AECOM 2024), which described GE's baseline restoration assessment activities in Reach 6. On the same date, GE submitted a *Conceptual Remedial Design/Remedial Action Work Plan for Reach 6* (Conceptual RD/RA Work Plan; Anchor QEA et al. 2024), describing GE's conceptual design for remediation of Reach 6 to achieve the above-described requirements and standards. As described in that plan, the conceptual design did not include an approximately 12.6-acre portion of the headwaters leading into Woods Pond (a transition zone between the upstream river section and Wood Pond), which is part of Reach 6 but is not subject to the post-capping minimum water depth. Rather, as explained therein, the conceptual design for the remediation of that area will be presented in a later addendum to the Final RD/RA Work Plan for Reach 6.

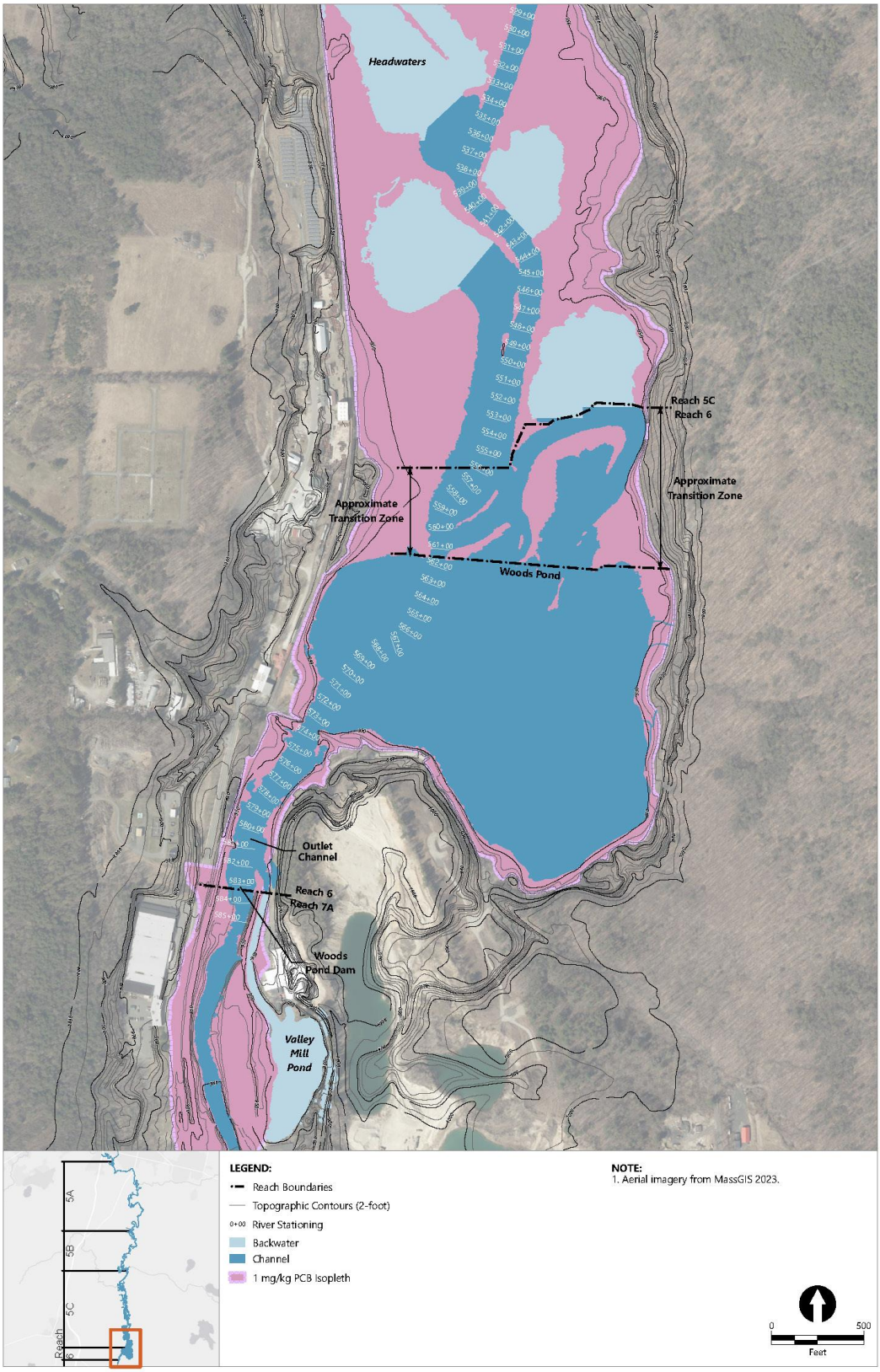

Figure 1. Reach 6 Site Map.

1.2 Objective and Requirements

The objective of this Phase IB CRS Work Plan is to describe the investigations, including intensive survey field investigations, necessary to determine whether and the extent to which potentially significant cultural resources could be impacted by remediation and support activities in the areas covered by the Reach 6 Conceptual RD/RA Work Plan. The requirements for a Phase IB CRS Work Plan are specified in Section 4.3.3.2 of the Final Revised SOW. That section states, in pertinent part:

> "The Work Plan will first describe and map the archaeological sensitivity of each pertinent segment of the subject area (i.e., whether it contains known cultural resources and its potential to contain unidentified potentially significant cultural resources). These sensitivity maps will be compared with the areas targeted for remediation and support areas (including access roads staging areas, and shoreline support facilities), as described in the Conceptual RD/RA Work Plan. The objective of this comparison will be to determine whether any areas identified as containing known potentially significant cultural resources or having a 'high potential' to contain such resources are situated within or immediately adjacent to the areas subject to remediation or . . . remediation support facilities. This comparison will also include identification of areas within the Historic Architectural [Area of Potential Effects] where known or suspected historic structures could be affected. The Work Plan will identify additional information needed to determine whether the remediation and supporting activities will impact any potentially significant cultural resources . . . , including areas that need field investigations to make that determination. The Work Plan will describe the proposed field investigations to satisfy those information needs."

For purposes of this CRS, potentially significant cultural resources consist of archaeological and historical resources in Reach 6 that are subject to the Applicable or Relevant and Appropriate Requirements (ARARs) relating to such resources, as listed in Attachment C to the Revised Permit – namely, the National Historic Preservation Action (NHPA) and its regulations, the federal Archaeological and Historic Preservation Act, and the Massachusetts Historical Commission Act and its regulations. These resources include resources that are listed or could potentially meet the criteria for listing on the National Register of Historic Places (NRHP), resources that are listed on the Massachusetts State Register of Historic Places (SRHP) and included on the State Inventory of Historic and Archaeological Assets, and potentially significant scientific, prehistorical, historical, or archaeological data subject to the Archaeological and Historic Preservation Act – collectively referred to herein as "potentially significant cultural resources." These resources include properties of traditional religious and cultural importance that fall into any of the above categories.

As stated in the Final Revised SOW, the Phase IB CRS Work Plan is to map the areas that contain or have a "high potential" to contain known cultural resources. That mapping was already presented for the ROR, including Reach 6, in the Revised Phase IA CRA Report and is included again in this work plan. It is likewise necessary to define the Archaeological Area of Potential Effects (APE) and the

Historic Architectural APE. For Reach 6, the Archaeological APE comprises areas where remediation is anticipated to occur, as well as associated support areas, as delineated in the Conceptual RD/RA Work Plan; and the Historic Architectural APE encompasses historic structures in adjacent areas that could potentially be affected by remediation and support activities. Those APEs are then compared with the areas identified as containing known potentially significant cultural resources or having a high potential to contain such resources, in order to identify areas where intensive survey investigations will be required. Phase IB intensive survey investigations are then proposed in such areas.

In coordination with the design information presented in the Conceptual RD/RA Work Plan, this Phase IB CRS Work Plan describes the investigations needed to determine whether the remediation and support activities for this RU, as designed, will impact any potentially significant cultural resources. The scope of these investigations is coextensive with that of the Conceptual RD/RA Work Plan in that it does not include the Woods Pond headwaters at this time. Areas requiring investigation include the following to the extent that they would be impacted by remediation or support activities:

- Submerged aquatic areas with high potential to contain cultural resources;
- Floodplain areas and the locations of support facilities outside the floodplain with known cultural resources or high potential to contain cultural resources;
- Areas of known or suspected historic structures within the Historic Architectural APE.

1.3 Work Plan Organization

The remainder of this Phase IB CRS Work Plan is organized into the following sections:

- Section 2 provides a summary of the location and character of anticipated remediation and support activities in Reach 6, as currently defined in the Conceptual RD/RA Work Plan, and presents the resulting revised definitions of the Areas of Potential Effects (APEs).
- Section 3 contains a description of the areas where intensive field surveys will be conducted as part of the Phase IB CRA and the proposed methods to be used for those surveys.
- Section 4 presents the anticipated schedule and reporting for Reach 6 Phase IB CRS activities, as well as an overview of possible subsequent CRA activities.

2 Areas of Potential Effects

2.1 Overview of Reach 6 Remediation

Reach 6 begins approximately 10 miles downstream of the Confluence and includes Woods Pond, which is an impounded waterbody formed by the construction of Woods Pond Dam in the late 1800s, and its associated floodplain (Figure 1). The existing dam at Woods Pond is a concrete overflow weir dam constructed in 1989.

Woods Pond proper is approximately 0.2 mile in length and has a surface area of approximately 53.6 acres. Water depths (as measured from the crest of the dam) over much of the pond generally range from one to three feet; however, a deeper portion on the southeastern side of the pond has a maximum depth greater than 15 feet. There is also a relatively pronounced channel through Woods Pond, which provides a primary flow pathway. The water in most of Woods Pond is relatively slow-moving and contains aquatic habitat characteristics of a standing, shallow-water environment.

At the southern end of the pond, there is a 3.7-acre outlet channel leading to the dam, and a raceway that discharges back in the Housatonic River approximately 360 feet downstream of the dam over stoplogs that control the water level in the raceway. The raceway is connected via a culvert to a smaller (4.6-acre) pond known as Valley Mill Pond, which will also be addressed as part of the Reach 6 remediation.

Within Reaches 5 and 6 (i.e., between the Confluence and Woods Pond Dam), the CD defines the ROR site boundary as the floodplain area extending laterally to the 1 milligram per kilogram (mg/kg) polychlorinated biphenyl (PCB) isopleth, which corresponds approximately to the 10-year floodplain. The floodplain in Reach 6 is relatively narrow, generally extending no more than 50 to 150 feet from the pond shoreline.

Under the Revised Permit, as described above, remediation in Reach 6 will include removal and engineered capping of sediments in the entire bed of Woods Pond and the outlet channel, removal of sediments followed by capping or backfilling in Valley Mill Pond, and removal and replacement of floodplain soils as necessary to meet specified PCB Performance Standards in the Revised Permit.[2]

In addition, as discussed in the Conceptual RD/RA Work Plan, a shoreline support facility will be constructed along the southern shoreline of Woods Pond to support the dredging operations, and a hydraulic transport pipeline will run from there to the Upland Disposal Facility (UDF) located near Woods Pond but outside the floodplain. In addition, it is anticipated that an area to the west of Woods Pond (outside 1 mg/kg PCB isopleth) will be used for the construction of a rail loading and

[2] As noted above, the Reach 6 remediation described in the Conceptual RD/RA Work Plan does not include the headwaters transition zone, which will be addressed in a later addendum to the Final RD/RA Work Plan for Reach 6.

unloading area (referred to as the Woods Pond Spur rail facility), as described in GE's *Revised On-Site and Off-Site Transportation and Disposal Plan*, submitted on October 15, 2024 (Arcadis 2024), as well as the Conceptual RD/RA Work Plan for Reach 6.

2.2 Delineation of Areas of Potential Effects

This section describes the updated Archaeological APE and Historic Architectural APE within Reach 6 based on the scope and extent of remediation and support activities as currently identified in the Conceptual RD/RA Work Plan. The Archaeological APE encompasses Woods Pond proper, the outlet channel, and Valley Mill Pond, as well as the Reach 6 floodplain areas that will be subject to remediation activities. This APE also includes the locations of the shoreline support facility, the anticipated Woods Pond Spur rail loading/unloading area, and the hydraulic pipeline route from the shoreline support facility to the UDF.[3] The Historic Architectural APE encompasses the locations adjacent to the Archaeological APE that are visible from areas involved in remediation or support activities. This APE includes areas which could be indirectly impacted by factors such as noise, vibration from equipment, or vehicle movements associated with the remediation or support activities.

In the Revised Phase IA CRA Report, the Archaeological APE was defined as equivalent to the ROR extent of the 1 mg/kg PCB isopleth since the specific locations that may experience disturbance as a result of remediation activities was not yet known. At the present time, more detailed remediation plans have been developed that show the specific areas in Reach 6 subject to remediation, as well as anticipated support areas. Those areas are presented in the Conceptual RD/RA Work Plan and are shown on Figure 2. Specifically, that figure identifies the areas of sediment remediation (Woods Pond, the outlet channel, and Valley Mill Pond) and the floodplain areas subject to remediation, as well as the shoreline support facility, the hydraulic pipeline route, and the Woods Pond Spur rail loading/unloading area.[4] These identified areas on Figure 2 collectively comprise the Archaeological APE for Reach 6.[5]

In addition, a separate Historic Architectural APE will encompass the one known historic structure in the area, the Lenox Railroad Station, as well as any other historic structures that may be identified in areas adjacent to areas involved in remediation or support activities. Based on current information,

[3] The UDF area itself was previously surveyed for potential cultural resources, as described in two reports submitted in 2022 (AECOM 2022a, b).

[4] As discussed above, the Archaeological APE does not at this time include the Woods Pond headwaters/transition area, which was not addressed in the Conceptual RD/RA Work Plan.

[5] This figure does not include an overlay of the areas identified as having high archaeological sensitivity. Such an overlay is provided on Figure 5 in Section 3.1 below

the Historic Architectural APE is shown on Figure 3. The Historic Architectural APE boundaries may be adjusted as additional property-specific background research and fieldwork are conducted.

In the event that EPA's conditional approval of the Conceptual RD/RA Work Plan requires changes to the remediation and/or support areas, GE will, if necessary, submit revised figures describing changes to the APEs and the resulting areas to be surveyed. In the event that additional changes to those locations are identified during the course of later design activities or in the selected remediation contractor's operations plan, those locations may need to be modified further. If so, GE will prepare and present a proposal to EPA regarding the need for additional cultural resource surveys in an appropriate submittal – namely, the Final RD/RA Work Plan for Reach 6 or, if contractor's operations plan results in further changes from the Final RD/RA Work Plan, in the Supplemental Information Package (SIP) for Reach 6.

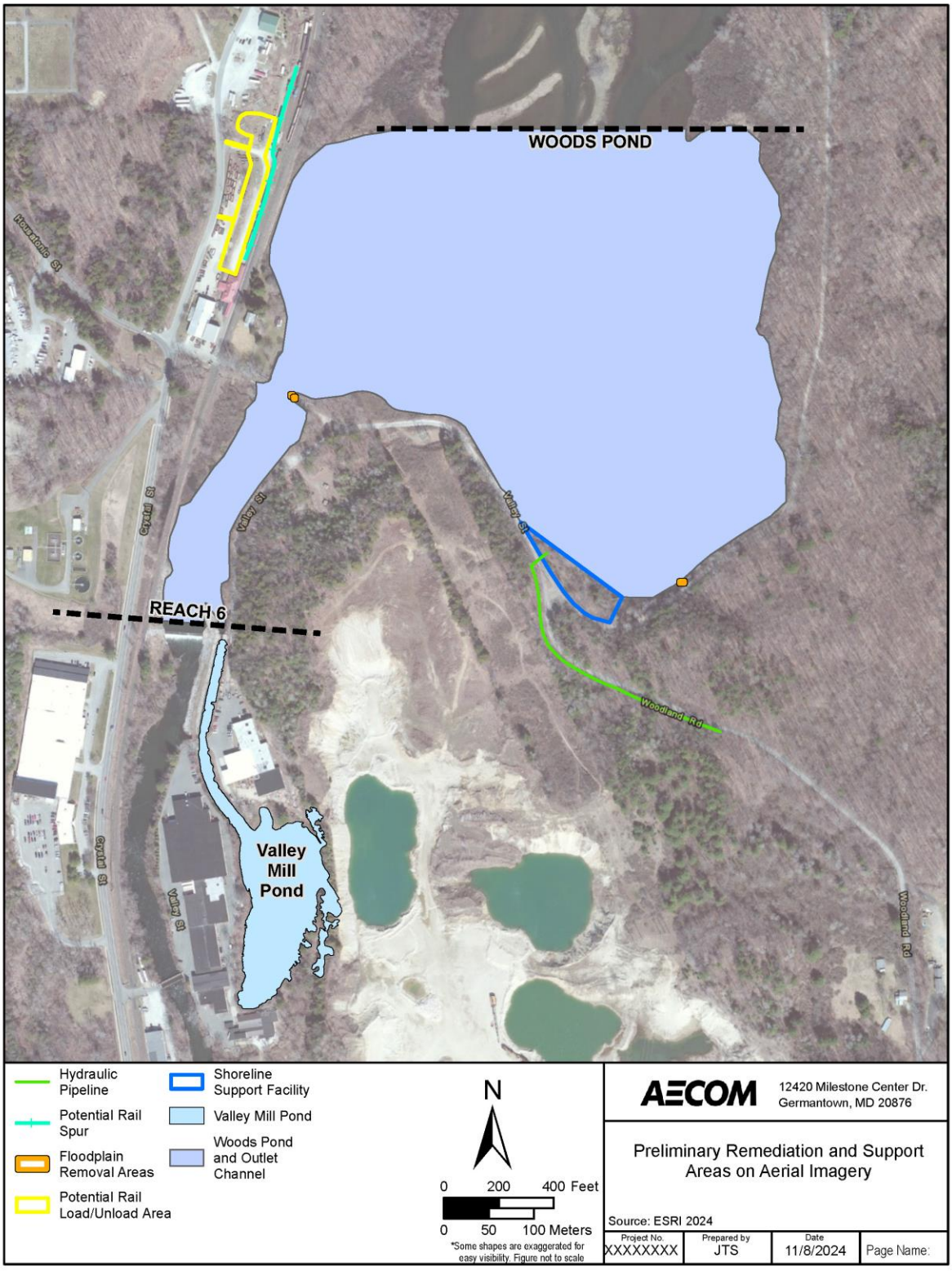

Figure 2. Anticipated Affected Areas – Comprising Archaeological Area of Potential Effects. (Note: Hydraulic pipeline continues south into the planned Upland Disposal Facility, which has already been surveyed for cultural resources.)

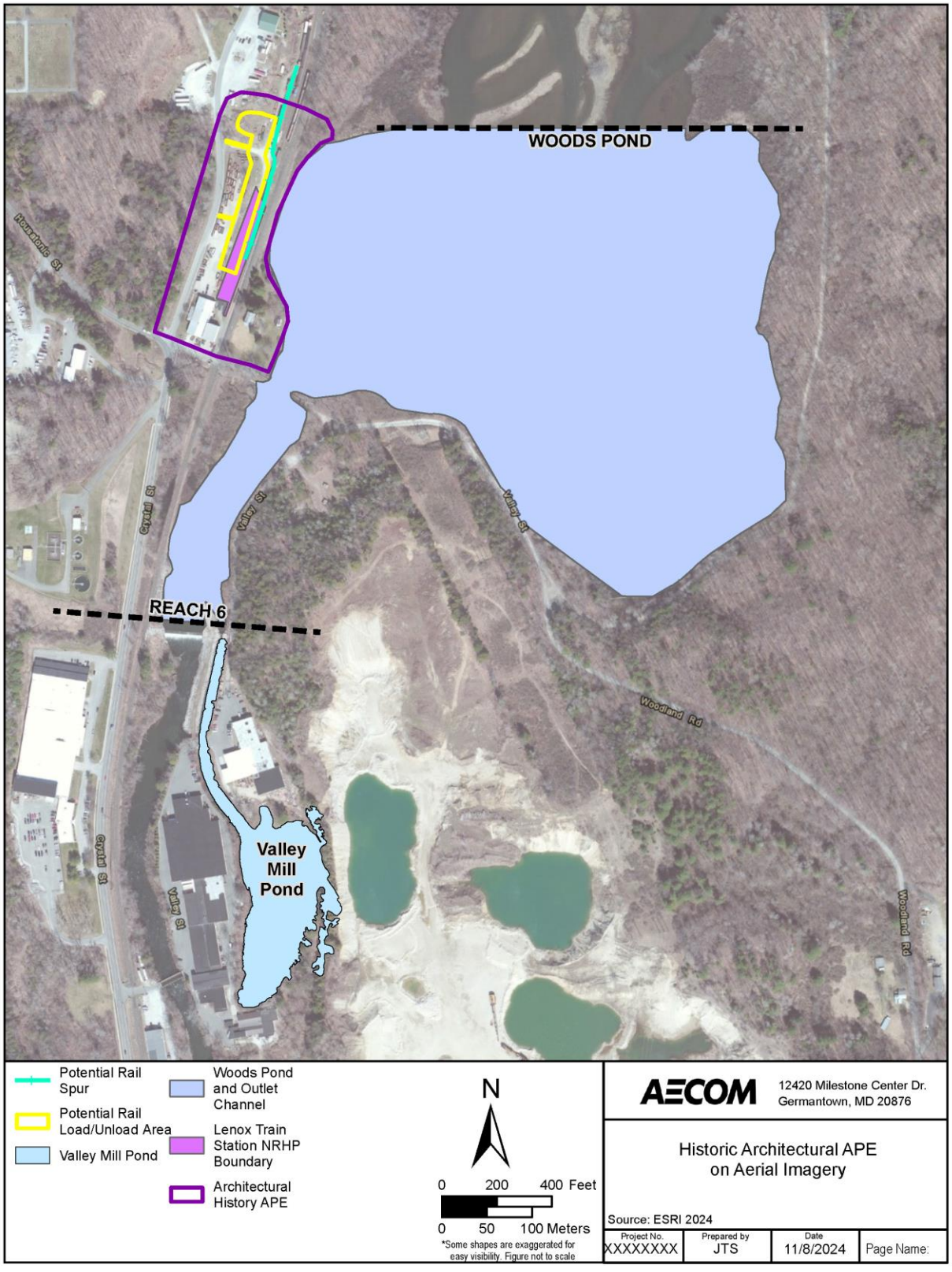

Figure 3. Historic Architectural APE.

3 Phase IB Survey Research Areas and Methods

3.1 Archaeological Survey

The Revised Phase IA CRA Report included mapping of areas within the ROR, including Reach 6, that contain known cultural resources or have a high potential to contain such resources. As described in that report, Reach 6 has areas of high potential for containing both pre-contact and post-contact archaeological sites. Those areas of high terrestrial or submerged archaeological sensitivity are shown on Figure 4.

In accordance with Section 4.3.3.2 of the Final Revised Work Plan, the areas of high archaeological sensitivity in Reach 6 have been overlain on the maps showing the anticipated remediation and support areas from the Conceptual RD/RA Work Plan. This overlay is shown on Figure 5. The specific areas where remediation or support areas are located within areas of high archaeological sensitivity will be subject to intensive archaeological survey work, as also shown on this figure.

The following sections describe the proposed survey work that will be conducted in these areas to determine whether they contain potentially significant cultural resources that could be affected by remediation or support activities. All field work will be conducted in accordance with Massachusetts Historical Commission (MHC) archaeological guidelines.

3.1.1 Aquatic Field Investigations

The Revised Phase IA CRA Report noted that there may be submerged landforms in Reach 6 with high potential for containing pre-contact sites adjacent to the course of the former river channels still visible in the pond. Historic data suggest that Woods Pond in its modern configuration was created sometime between 1876 and 1882. Before then, the pond was a separate, small pond east of the river, and twentieth century aerial photographs taken at times of lower water levels confirm the existence of this smaller pond, which became connected with the Housatonic River when the larger Woods Pond impoundment was created circa 1880. This smaller pond is also clearly visible on bathymetric maps of the bottom of Woods Pond.

In addition to potential for submerged former terrestrial landforms, Reach 6 has potential for historic structural remnants and historic archaeological remains. Between 1835 and circa 1880, it appears that there was a dam in the river just south of Lenox Railroad Station and adjacent to the Valley Mill; but it does not appear to have raised the elevation of the river surface sufficiently to create a larger impoundment outside the existing river channel until the 1880 dam was constructed.

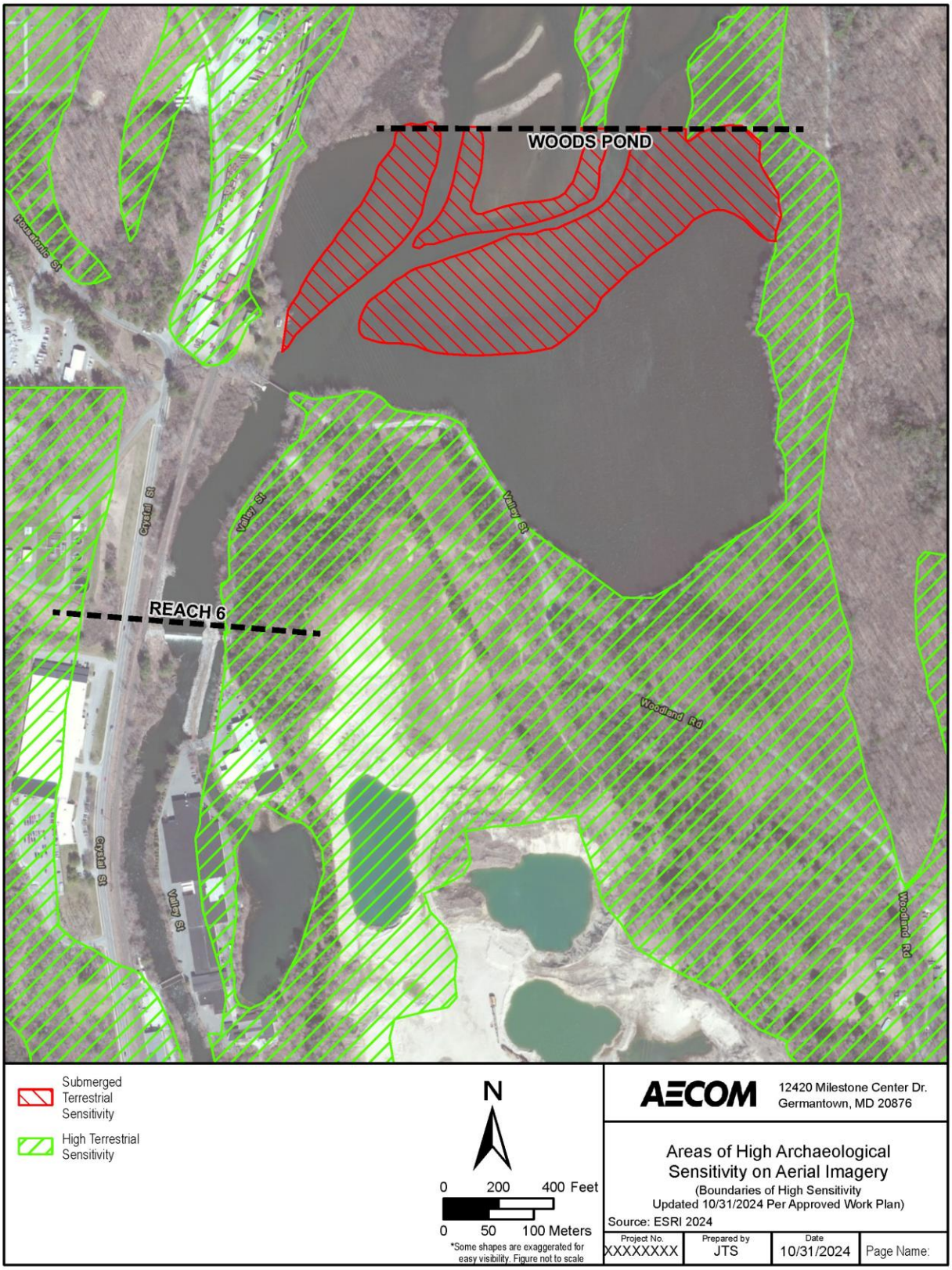

Figure 4. Archaeologically Sensitive Areas.

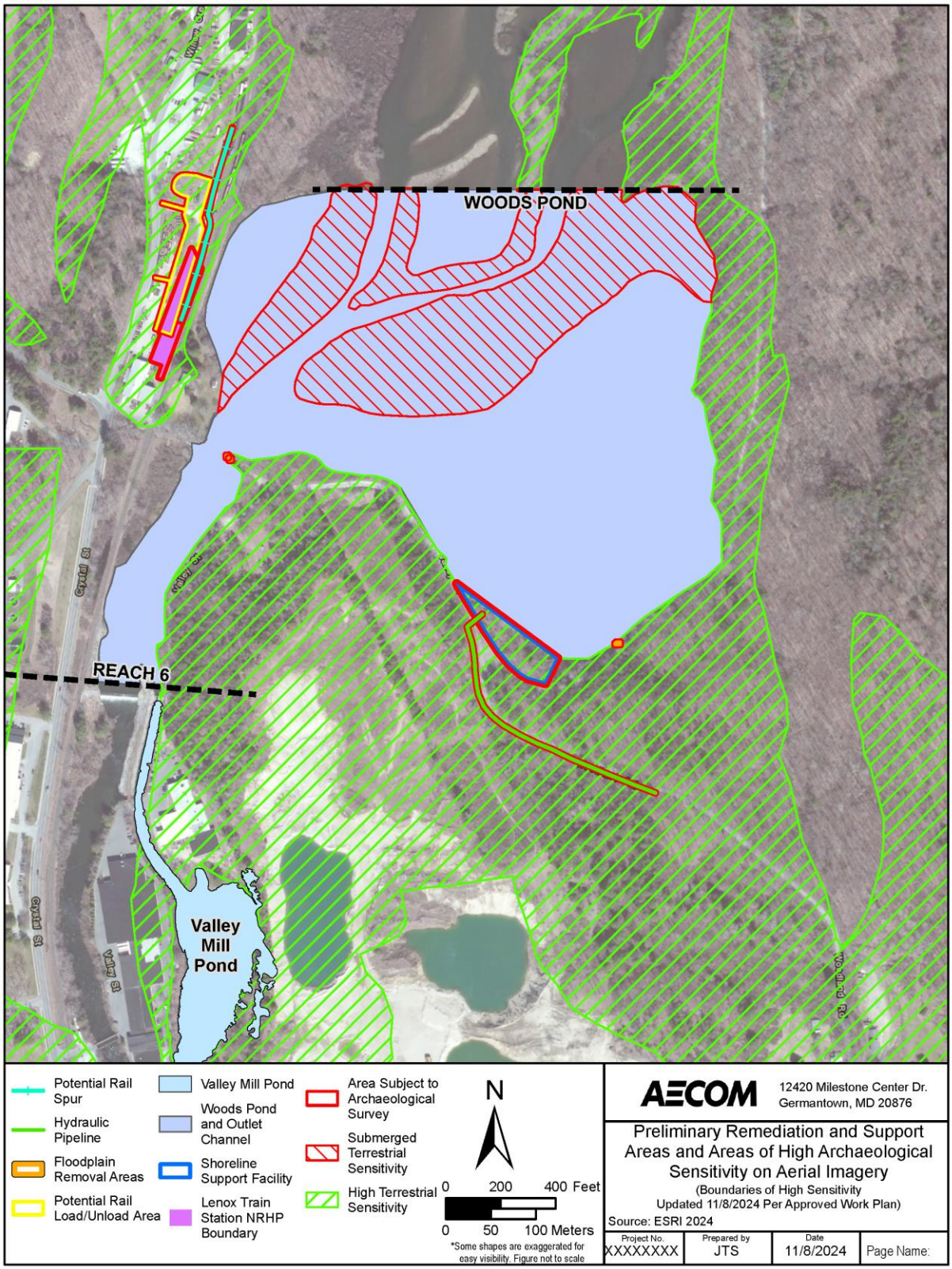

Figure 5. Areas of Proposed Phase IB Archaeological Evaluation.

During the Phase IB studies, the archaeological investigation of affected aquatic (submerged) areas will include review of the geotechnical data previously collected from the bottom of Woods Pond during PDI activities, as well as information on sediment texture and color recorded during the PCB sampling program conducted in Woods Pond as part of the PDI, all as reported in the Reach 6 PDI Report. The geomorphological review will also include examination of the bathymetric data previously collected from Woods Pond as part of the PDI to allow a more detailed definition of the former riverbank and pond shoreline locations that are now submerged. In addition, the Phase IB investigations will include review of the additional geotechnical data to be collected from Woods Pond under the Supplemental Data Collection Plan provided as Appendix F to the Conceptual RD/RA Work Plan. The information from these reviews will be used to help assess the general structure of the soil horizons present in the submerged landforms and to determine whether they have potential to contain potentially intact landforms containing buried cultural deposits. In addition, previously collected side-scan sonar imagery collected in Woods Pond as part of the Reach 6 baseline habitat assessment and reported in the Reach 6 BRA Report will reviewed for evidence of submerged historic structures.

If these reviews suggest the presence of submerged structures or potentially intact buried landforms within depths planned to be dredged, additional evaluations will be conducted, as necessary, in coordination with dredge plan designers to identify possible options for examination and/or monitoring during dredging.

3.1.2 Terrestrial Field Investigations

The field work for the terrestrial archaeological survey will begin with a pedestrian inspection of the areas proposed for survey to visually assess environmental characteristics, search for visible above-ground cultural resources, and assess evidence for prior disturbances and land modifications. In addition, the boundaries of the archaeologically sensitive zones will be ground truthed prior to more detailed investigations. Hand auger borings will also be advanced to further determine the potential depths of archaeologically sensitive soil and appropriate sampling methods.

Once the limits of areas requiring a systematic survey are more precisely defined in the field, the standard approach will be to excavate 50-centimeter-square shovel test pits (STPs) spaced at 10-meter intervals across the areas to be investigated. Table 3-1 provides a breakdown of the currently projected number of STPs that will be needed to investigate the subject terrestrial areas. These include areas of floodplain soil removal, the anticipated shoreline support facility, the rail loading/unloading area, and the pipeline route.

Table 3-1. Summary of STPs Projected for Reach 6.

Type of Affected Area	Total STPs
Floodplain Remediation	10
Shoreline Support Facility	50
Rail Loading/Unloading Area	50
Hydraulic Pipeline	10
Totals	**120**

During the intensive field surveys, STPs measuring 50 cm by 50 cm will be excavated within 10-cm arbitrary levels within natural soil strata into undisturbed subsoils or into the first C-horizon, but in no case deeper than three feet. Actual safe working depths will be determined by a competent professional who is capable of identifying existing and predictable hazards or working conditions, soil types, and protective systems required. A hand-held soil auger may also be used in the bottom of each test pit to examine deeper soil stratigraphy, depending on the character of the soil horizons documented at the bottom of the test pit.

If potential cultural features are encountered, they will be cleaned and documented in plan view via drawings and photographs. In such cases, excavations will then be halted and the STP backfilled for feature preservation for potential future archaeological investigation if needed. All excavated soil will be screened through 1/4-inch mesh hardware cloth for systematic artifact recovery. All artifacts will be bagged and labeled by provenience, including the STP number, soil horizon, level, depth, date, and excavator initials. Each bag will be given a field specimen number for tracking purposes and will be documented on a field specimen log. Following excavation, STPs will be completely backfilled, and the backfill will be compacted, the sod replaced if present, and the area revegetated (if it was previously vegetated).

All STPs will be documented using field site forms that will document stratigraphic profiles, including a description of the soil type, texture, and color using the Munsell color chart. Measurements will be provided in metric. Artifacts recovered will also be documented per excavated level and characterized. The locations of all STPs and identified surface features will be mapped using a hand-held, sub-meter accurate GPS unit,

Photographs documenting the work will be taken. These will include photographs of sample STPs, including, but not limited to, all STPs with positive findings. Field photography will conform to the state archaeologist's memorandum on improving photography and cartography (Simon 2014). This includes the use of a north arrow, a metric scale, and sign board in all plan view, and profile photographs. Photos will be taken in consistent lighting, whenever possible, with any distracting items removed from the surrounding area. General view photographs of the project area, however,

will be taken without horizontal or vertical scales or sign boards to provide an overall visual of the conditions of the project area at the time of the archaeological investigations.

3.1.3 Laboratory Analysis and Curation

Any archaeological artifacts and samples recovered will be returned to the AECOM laboratory for professional analysis and cataloging. Artifacts will be cleaned and labeled. Any artifact needing conservation will be removed from the collection for separate processing and evaluation. After the artifacts are dry, they will be separated by class and placed in individual four-mil polyethylene bags, labeled with provenience information in permanent marker. The individual bags will be placed within a large bag(s) for the entire provenience. All bags will be labeled and will be pierced for air circulation.

Any artifacts recovered from the investigation will be fully inventoried and cataloged. This information will be used to establish the contemporaneity of contexts and strata, as well as to determine whether assemblages represent primary or secondary deposits. At a minimum, basic analyses performed on these artifacts from any given archeological context will include the identification of key characteristics for each object, including general form and function (e.g., nail – architectural), material composition (ceramic, glass, metal, etc.), manufacturing technique, date of manufacture, maker's marks (if present), and the total number of artifacts with such characteristic within a specific context.

Any artifacts recovered from intact deposits will additionally undergo more intensive analyses designed to facilitate the interpretation of these materials and the context in which they were found. Additional artifact characteristics will be recorded for identified vessels, including those related to methods of decoration, motifs, and use-wear. Efforts will also be made to more accurately date all diagnostic artifacts, and to utilize those data to establish *terminus post quem* (TPQ) and *terminus ante quem* (TAQ) dates for specified archeological deposits.

At the conclusion of this investigation, any artifacts recovered and project records will be prepared for permanent curation with a qualified curation facility. All artifacts will be delivered in archivally stable Hollinger Record Storage Boxes or an equivalent. Artifacts within the boxes will be packaged in labeled, vented, zipper-sealed polyethylene bags. Along with the artifact collection and a paper catalog, an electronic format copy of the final catalog will be provided. In addition, all notes, photographs, drawings, maps, and both original and duplicate copies (photo-reproduced onto acid-free paper) of all field documentation and notes will be curated.

3.2 Historic Architectural Survey

As mentioned above and noted in the Phase I CRA Report, there is a known historic structure located just west of Woods Pond. This is the Lenox Railroad Station (LEN.322), which is listed on the NRHP.

This property is mapped within the Historic Architectural APE (see Figure 4 above) as it could be affected by remediation and support activities in Reach 6, including the anticipated rail loading/unloading area near that station. Although no direct impacts such as demolition or modification are planned for that above-ground structure, there could potentially be indirect effects from activities such as noise and vibration from heavy equipment operation and transportation, as well as visual intrusions, that could diminish the integrity of the property's significant historic features.

Additional investigations will be conducted to assess the presence of additional historic structures within or near the identified Reach 6 remediation and support areas, including the late 19th century house that is situated east of the railroad station, between the rail line and Woods Pond. This assessment will include background research on the history of the neighborhood and individual properties, including archival research incorporating deeds and probate records and print and visual sources such as historic photographs and maps. If any such structures are identified in such research, they will be evaluated against established criteria to determine their significance in the broad patterns of history and architecture.

The Lenox Railroad Station, as well as any other historic property identified that could meet the eligibility criteria for the NRHP, will be inspected to assess its condition and record details of its architectural and landscaped qualities, with reference to standard architectural and landscape architectural terminology. Detailed photographs will be taken of each such property and a photo log created that will describe the subject of each photograph, the address of the property, and the direction in which the camera is facing.

Any identified potential indirect impacts on properties within the Historic Architectural APE will be identified in the Phase IB CRS Report for Reach 6, and any required avoidance/mitigation will be proposed in the Final RD/RA Work Plan for Reach 6.

3.3 Coordination and Consultation

Section 106 of the NHPA requires federal agencies to engage in formal consultation with certain groups and individuals, known as consulting parties, which typically include states agencies and Native American tribes, Solicitation of information from the MHC and with Native American tribal representatives regarding the locations of cultural resources and traditional cultural properties in the vicinity of the ROR was previously conducted through EPA's outreach efforts to consulting parties, as well as through AECOM's contacts with the Stockbridge Munsee Band of Mohican Indians and the Wampanoag Tribe of Gay Head (Aquinnah).

During the Phase IB intensive survey activities in Reach 6, GE will continue to support EPA's efforts to coordinate and consult with state agencies and Native American tribes. This outreach has been, and

will continue to be, an ongoing aspect of the cultural resources regulatory compliance process for the ROR Remedial Action. GE will work with EPA to provide at least one-week notice to tribal representatives prior to cultural resource field efforts so that they can participate as desired.

3.4 Reporting

Following an assessment of the field data collected and the laboratory analysis that comprise the Phase IB intensive survey work, AECOM will produce a Phase IB CRS Report for Reach 6 on GE's behalf presenting the results of that work. In accordance with Section 4.3.3.2 of the Final Revised SOW, that report will include an assessment of whether the remediation and support activities in Reach 6 would result in an adverse effect on any potentially significant archaeological or historic structural resources. In addition, to the extent that project activities would result in an such an adverse effect, the report will also assess whether locations containing such potentially significant cultural resources or the adverse effects themselves can be avoided consistent with the goal of the remediation program for Reach 6. If the resources or effects cannot be avoided, the report will determine, to the extent possible with the available data, whether the resources are in fact significant – i.e., are listed on the NRHP (as Lenox Raiload Station is) or meet the criteria for eligibility for inclusion in the NRHP, or are listed on the Massachusetts SRHP and included on the State Inventory of Historic and Archaeological Assets, or constitute significant scientific, prehistorical, historical, or archaeological data under the Archaeological and Historic Preservation Act. If additional information is needed to make that determination, the report will outline the scope of such additional data needs. In addition, the report will evaluate the need for any additional Phase IB field investigations to further assess impacts on potentially significant cultural resources, and if appropriate, will propose such investigations.

The Phase IB CRS Report will be prepared to meet the standards of the MHC reporting guidelines (950 CMR 70.14). At a minimum, the report will include the following: an abstract (consistent with the State Archaeologist's memorandum on archaeological abstracts), introduction, background research methods, description and justification of the research design, field testing methods, field results, laboratory procedures and analyses and discussion, conclusions, and recommendations for further work (if any), bibliography, and lists of tables, figures, and photographs. The report will include maps created in GIS depicting the locations of the areas surveyed and the results of field studies. All figures and field photographs will be prepared consistent with professional practices and the State Archaeologist's memorandum on cartography and photography. MHC Survey and Inventory Forms for all archaeological sites and historic structures examined during the study will be included in an appendix to the report.

3.5 Unanticipated Discoveries

In the case of an unanticipated discovery of human remains during the Phase IB CRS activities, the investigators will follow all relevant state and federal law and recommendations regarding treatment of human remains. GE and AECOM recognize the importance of providing careful and respectful treatment for human remains recovered as an unanticipated discovery or as part of this archaeological investigation. In the event of an unanticipated discovery of human remains, the following protocols will be followed:

(1) Should human remains or evidence of possible burials be encountered, work in the general area of the discovery will stop immediately and the location will be immediately secured and protected from damage and disturbance.

(2) Human remains and associated artifacts will be left in place and not disturbed. No skeletal remains or materials associated with the remains will be collected or removed until appropriate consultation has taken place and a plan of action has been developed.

(3) The county coroner/medical examiner, local law enforcement, the MHC, and the appropriate Native American Nations will be notified immediately. The coroner and local law enforcement will make the official ruling on the nature of the remains, being either forensic or archaeological.

(4) If human remains are determined to be Native American, the remains will be left in place and protected from further disturbance until a plan for their avoidance or removal can be generated. AECOM will consult with the MHC and appropriate Indian Nations to develop a plan of action that is consistent with the Native American Graves Protection and Repatriation Act (25 U.S.C. Ch. 32) and regulations thereunder (43 CFR Part 10).

(5) If human remains are determined to be non-Native American, the remains will be left in place and protected from further disturbance until a plan for their avoidance or removal can be generated in accordance with MHC's "Policy and Guidelines for Non-Native Human Remains Which are Over 100 Years Old or Older" and in a manner consistent with the Advisory Council on Historic Preservation (ACHP) Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects (ACHP 2007). Consultation with the MHC and other appropriate parties will be required to determine a plan of action.

In addition to these steps, in the event that there is an inadvertent discovery of human remains that are identified as potentially Stockbridge-Munsee (Mohican), the procedures outlined in the *Stockbridge Munsee Community Treatment and Disposition Of Human Remains and Cultural Items/Inadvertent Discovery Protocol* (Stockbridge Munsee Community Band of Mohican Indians, 2020) will be followed.

3.6 Compliance with ARARs

As noted in Section 1.2, the ARARs relating to cultural resources are listed in Attachment C to the Revised Permit. Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the ROR Remedial Action, as an on-site response action, must comply with the substantive provisions of those ARARs, but not their administrative requirements, as discussed in EPA's ARARs guidance (EPA 2023). As required by EPA, this section discusses how the Phase IB survey activities will comply with the substantive provisions of the identified ARARs. The Conceptual RD/RA Work Plan for Reach 6 includes, in Table 6-1, more details regarding the actions to be taken in Reach 6 to comply with the ARARs relating to cultural resources.

Federal ARARs

Section 106 of the NHPA (54 U.S.C. § 306108) and its implementing regulations at 36 CFR Part 800 require federal agencies to consider the impacts of their undertakings on cultural properties through identification, evaluation, mitigation processes, and consultation with interested parties. EPA's 1989 ARARs guidance (EPA 1989) specifically addresses which components of the NHPA are considered to be substantive and which components are considered to be administrative. According to that guidance, the substantive requirements of the NHPA include identification of cultural resources and mitigation or avoidance of impacts to cultural resources and the administrative requirements include consultation and coordination among the lead agency, the State Historic Preservation Office (SHPO), and the ACHP.

Attachment C to the Revised Permit states (on page C-5) that, if the RoR Remedial Action affects historic properties or structures subject to the NHPA and its regulations, "activities will be coordinated with the state, tribal and federal authorities and conducted in accordance with the substantive requirements of [the applicable] regulations."

The Archaeological and Historic Preservation Act of 1974, (54 U.S.C. 312501 et seq.) requires that the federal actions do not cause the loss of significant archaeological or historic data. This Act mandates preservation of data; it does not require protection of the actual site or facility. Attachment C to the Revised Permit states (on page C-5) that if it is determined that the ROR Remedial Action "may cause irreparable loss or destruction of significant scientific, prehistorical, historical, or archaeological data, EPA will notify state, tribal or federal authorities and comply with the substantive requirements in this statute."

For the present stage of the project, the Phase IB intensive survey work will comply with these federal ARARs by conducting systematic field surveys and lab analysis to determine the extent to which potentially significant archaeological sites or historic structures exist within the Archaeological and Historic Architectural APEs and would be affected by remediation and support activities in Reach 6,

and by preserving any significant archaeological or historic artifacts found. See also Table 6-1 of the Conceptual RD/RA Work Plan.

State ARARs

The Massachusetts Historical Commission Act, MGL Ch. 9, section 27C, and its implementing regulations at 950 CMR 71.07 require a state body that is undertaking a project or funding or licensing a private project to notify the MHC of the project and give the MHC an opportunity to determine whether the project will have an adverse effect on any historic or archaeological properties listed on the SRHP. If the project will have such an effect, the regulations outline a process for the MHC and project proponents to attempt to come to an agreement on ways to eliminate, minimize, or mitigate adverse effects. Attachment C to the Revised Permit states (on page C-14) that these requirements will be met.

For the present stage of the project, the Phase IB intensive survey work will comply with these state ARARs by conducting systematic field surveys and lab analysis to determine whether historic or archaeological properties listed on the SRHP (or other properties included in the State Inventory of Historic and Archaeological Assets that could be eligible for the SRHP) are present in the Archaeological and Historic Architectural APEs and would be affected by remediation and support activities in Reach 6. See also Table 6-1 of the Conceptual RD/RA Work Plan.

4 Schedule and Next Steps

Tasks required by this work plan include background research for historic architectural resources, archaeological and historic architectural field surveys, laboratory analysis of archaeological data, and report preparation.[6] Work on these tasks will be initiated within 30 days of EPA approval of this Revised Phase IB CRS Work Plan or 45 days after EPA's conditional approval of the Reach 6 Conceptual RD/RA Work Plan (whichever is later), subject to winter weather constraints. Archaeological field survey work cannot be done under conditions of frozen ground or snow covering the surface, so such work will be likely not be possible during the winter. Given the pond and floodplain location of the project area, conditions of flooding and high water would also constrain the field survey work. Once the Phase IB activities described herein have been initiated, it is anticipated that they will be completed within three months and a Phase IB CRS Report for Reach 6 submitted to EPA within 60 days thereafter.[7]

If the Phase IB investigations and assessments indicate that the Reach 6 remediation or support activities would result in an adverse effect on potentially significant archaeological or historic structural resources, that such effects cannot be avoided, and that additional information is necessary to determine whether the resources to be affected are in fact significant (as defined above), GE will prepare and submit a Phase II CRA Work Plan to evaluate the latter issue. The Phase II CRA Work Plan will be submitted on a schedule specified in the Phase IB CRS Report and will describe the additional activities proposed to determine whether the resources identified are in fact significant. Following EPA approval, the proposed activities will be conducted, and the results will be presented in a Phase II CRA Report, to be submitted no later than the date of submittal of Final RD/RD Work Plan for Reach 6.

If it is determined that remediation or support activities would affect significant cultural resources, GE will evaluate whether those resources can be protected during such activities. In the event that the remediation and/or supporting activities would result in unavoidable adverse effects on significant

[6] As indicated in Section 2.2, in the event that EPA's conditional approval of the Conceptual RD/RA Work Plan requires changes to the remediation and/or support areas, GE will, if necessary, submit revised figures describing changes to the APEs and areas to be surveyed.

[7] As also noted in Section 2.2, in the event that additional changes to the locations of remediation or support areas are identified during the course of later design activities or in the selected remediation contractor's operations plan, GE will present a proposal to EPA regarding the need for additional cultural resource surveys. This proposal will be included in the Final RD/RA Work Plan for Reach 6 or, if remediation contractor's operations plan results in further changes from the Final RD/RA Work Plan, in the Reach 6 SIP. If additional Phase IB survey activities are necessary, those activities will be conducted following EPA approval of the relevant proposal and on a schedule set forth in the proposal, and the results will be presented in an addendum to the Phase IB CRS Report for Reach 6.

cultural resources, mitigation activities may be necessary. If necessary, proposed mitigation activities will also be included in the Final RD/RA Work Plan for Reach 6.

5 References

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