

**Public Input on General Electric's  
Phase 1B Cultural Resources Survey Report for Reach  
5A, dated January 31, 2025**

**February 2025 - April 2025**

Public Input ended on April 7, 2025



## TOWN OF LEE

32 Main Street, Lee, MA 01238

[www.lee.ma.us](http://www.lee.ma.us)

R. Christopher Brittain,

Town Administrator

April 7, 2025

Mr. Dean Tagliaferro  
EPA New England  
10 Lyman Street, Suite 2  
Pittsfield, MA 01201

Dear Mr. Tagliaferro,

Following, please find comments from the Town of Lee regarding General Electric's Cultural Resources Survey Report.

1. The Phase 1B Cultural Resources Survey Report for Reach 5A presents survey results for portions of Reach 5A that will be affected by remediation activities, including support areas such as temporary access roads and staging areas. As demonstrated by ongoing reviews, amendments and adjustments to various Rest of River activities (including the substantial changes between the initial On-Site and Off-Site Transportation Plan (October 2023) to the Revised On-Site and Off-Site Transportation and Disposal Plan (October 2024) (T&D Plans), continued Phase 1B surveys may be needed in the future. This report does not state if further Phase 1B surveys are anticipated or planned. Such efforts may be needed as further refinements can occur, as shown by the changes to the T&D Plans over time.

*The Town would like to know if there are any more Phase 1B surveys anticipated in relation to further Rest of River changes.*

2. TASC has tried to identify ways for GE's Rest of River efforts to include opportunities that provide community benefits. Reach 5A involves the removal of sediment slurry waste materials and riverbank soil waste materials. It is possible that these removal efforts will reveal artifacts of cultural significance that the contractor plans to handle properly. These artifacts may be of value and interest to the community. There may be opportunities for GE to coordinate the fate of these artifacts for community benefit. For example (for Reach 6), the Berkshire Scenic Railway Museum, which is housed in the historic 1903 Lenox train station, is next to Woods Pond. A rail spur and a substantial sediment

removal action in the pond are proposed in the Revised On-Site and Off-Site Transportation and Disposal Plan. If these actions reveal railroad-related artifacts, they could be shared with the museum.

*The Town would like to remain involved with the Rest of River remedial design and remedial action efforts to identify opportunities for GE to share any artifacts of interest and value.*

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Brittain', with a stylized flourish at the end.

R. Christopher Brittain  
Town Administrator

cc:

The Honorable Edward Markey, U.S. Senate

The Honorable Elizabeth Warren, U.S. Senate

The Honorable Richard Neal, U.S. House of Representatives

Her Excellency Maura Healey, Governor of Massachusetts

The Honorable Andrea Joy Campbell, Attorney General of Massachusetts

The Honorable Paul Mark, State Senator

The Honorable Leigh Davis, State Representative, 3rd Berkshire

Select Board, Town of Lee

PCB Advisory Board, Town of Lee



# **Technical Assistance Services *for* Communities**

## **GE-Pittsfield/Housatonic River Site**

### **Comments on the Phase 1B Cultural Resources**

#### **Survey Report for Reach 5A**

**March 21, 2025**

**Contract No.:** 68HERH21A0018

**Call Order Number:** 68HERH22F0082 (14.0.0 OSRTI – Regional & Headquarters  
TASC/CI Support)

**Technical Direction:** R1 2.12.14 GE Pittsfield

### **Technical Assistance Services for Communities**

#### **Comments on the GE-Pittsfield/Housatonic River Site – Phase 1B Cultural Resources**

##### **Survey Report for Reach 5A, January 2025**

## **Introduction**

This document provides TASC comments on the 2025 Phase 1B Cultural Resources Survey Report for Reach 5A. This document is for the Berkshire Regional Planning Commission, the city of Pittsfield, the towns of Lee, Lenox, Stockbridge, Great Barrington and Sheffield, Massachusetts Audubon, the Berkshire Environmental Action Team, and other entities to use as they develop comments to share with the U.S. Environmental Protection Agency. TASC does not make comments directly to the EPA on behalf of communities. This document is funded by the EPA's TASC program. The contents do not necessarily reflect the policies, actions or positions of the EPA.

Pursuant to the Revised Resource Conservation and Recovery Act Permit Modification (Revised Final Permit) issued by the EPA to the General Electric Company on December 16, 2020, for the Rest of River portion of the GE-Pittsfield/Housatonic River site, GE submitted a Final Revised Rest of River Statement of Work on September 14, 2021, specifying the deliverables and activities that GE will conduct to design and implement the Rest of River Remedial Action. Pursuant to Section II.H.15 of the Revised Permit and Section 4.2.1.7 of the Final Revised Statement of Work, GE submitted the Phase 1B Cultural Resources Survey Report for Reach 5A that presents the results of the Cultural Resources Survey activities conducted at Reach 5A in 2024. The results of additional surveys to be conducted in 2025 will be presented in an addendum to the report after the completion of those additional surveys.

## **Summary**

The Phase 1B Cultural Resources Survey Report for Reach 5A has eight sections:

1. Introduction and Background
2. Previous Archaeological Survey
3. Phase 1B Archaeological Survey Research Areas and Methods
4. Results of Phase 1B Archaeological Survey
5. Archaeological Site Summaries and Recommendations
6. Historic Architectural Survey
7. Summary and Recommendations
8. References

The Phase 1B Cultural Resources Survey Report for Reach 5A describes the results of the investigations, including intensive survey field investigations, conducted to determine the extent to which potentially significant cultural resources could be impacted by remediation and support activities in Reach 5A. For purposes of the Phase 1B Cultural Resources Survey, potentially significant cultural resources consist of archaeological and historic architectural resources in Reach 5A that are subject to the Applicable or Relevant and Appropriate Requirements related to such resources, as listed in Attachment C to the Revised Permit – namely, the Historic Preservation Act and its regulations, the Federal Archaeological and Historic Preservation Act and the Massachusetts Historical Commission Act and its regulations.

#### **TASC Comments**

The objective of the Phase 1B Cultural Resources Survey Report for Reach 5A is to present survey results of portions of Reach 5A of the Housatonic River in Pittsfield, Massachusetts, that: (a) will be affected by remediation activities to address polychlorinated biphenyls, including support areas such as temporary access roads and staging areas; and (b) contain or have a high potential to contain cultural resources. A series of previously documented work plans and findings are the basis for the Phase 1B Cultural Resources Survey Report for Reach 5A, as follows:

1. 2022 Supplemental Phase 1A Cultural Resources Assessment Work Plan (January 2022). This work plan describes the process and activities that GE proposed to conduct to begin to identify potentially affected Rest of River 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. The EPA conditionally approved the work plan on April 20, 2022.
2. 2022 Phase 1A Cultural Resources Assessment Report (October 2022). This 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 Rest of River area.
3. 2023 Revised Supplemental Phase 1A Cultural Resources Assessment Report (March 2023). GE submitted this report for the Rest of River on March 10, 2023, with a public release version submitted on March 14, 2023. The report stated that the next step in the process is to conduct a Phase 1B Cultural Resources Survey of Rest of River areas 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. In particular, it noted that the next cultural resources investigation

submittal would be the Phase 1B Cultural Resources Survey Work Plan for Reach 5A, the first Rest of River remediation unit subject to remediation. TASC reviewed this work plan.

4. 2023 Phase 1B Cultural Resources Survey Work Plan (September 2023). This work plan addresses the surveying of cultural resources in parts of Reach 5A that will be affected by remediation activities to address PCBs and/or support activities such as access roads and staging areas for the cleanup and contain or have a high potential to contain cultural resources.

TASC reviewed and commented on these reports to determine if they adhere to requirements in the Statement of Work and the Revised Final Permit and to identify possible concerns for community consideration. TASC revisited comments on each of these reports to make sure the Phase 1B Cultural Resources Survey Report for Reach 5A addresses these earlier concerns and to determine if there are any more issues of potential interest to the community. TASC found that the report largely addressed the previous concerns and appreciated the focus of Phase 1B efforts on aquatic settings. As a result, TASC found minimal concerns to comment on in the report. These concerns are summarized below.

1. The Phase 1B Cultural Resources Survey Report for Reach 5A presents survey results for portions of Reach 5A that will be affected by remediation activities, including support areas such as temporary access roads and staging areas. As demonstrated by ongoing reviews, amendments and adjustments to various Rest of River activities (including the substantial changes between the initial On-Site and Off-Site Transportation Plan (October 2023) to the Revised On-Site and Off-Site Transportation and Disposal Plan (October 2024) (T&D Plans), continued Phase 1B surveys may be needed in the future. This report does not state if further Phase 1B surveys are anticipated or planned. Such efforts may be needed as further refinements can occur, as shown by the changes to the T&D Plans over time.

*The community may want to ask the EPA if there are any more Phase 1B surveys anticipated in relation to further Rest of River changes.*

2. TASC has tried to identify ways for GE's Rest of River efforts to include opportunities that provide community benefits. Reach 5A involves the removal of sediment slurry waste materials and riverbank soil waste materials. It is possible that these removal efforts will reveal artifacts of cultural significance that the contractor plans to handle properly. These artifacts may be of value and interest to the community. There may be opportunities for GE to coordinate the fate of these artifacts for community benefit. For example (for Reach 6), the Berkshire Scenic Railway Museum, which is housed in the historic 1903 Lenox train station, is next to Woods Pond. A rail spur and a substantial sediment removal action in the pond are proposed in the Revised On-Site and Off-Site Transportation and Disposal Plan. If these actions reveal railroad-related artifacts, they could be shared with the museum.

*The community may want to remain involved with the Rest of River remedial design and remedial action efforts to identify opportunities for GE to share any artifacts of interest and value.*

## References Cited

AECOM, 2022a. GE-Pittsfield/Housatonic River Site Supplemental Phase 1A Cultural Resources Assessment Work Plan, January 2022. <https://semspub.epa.gov/work/01/662290.pdf>.

AECOM, 2022b. GE-Pittsfield/Housatonic River Site Rest of River Supplemental Phase 1A Cultural Resources Assessment Report for the Housatonic Rest of River – Public Release Version. October 24, 2022. <https://semspub.epa.gov/work/01/668925.pdf>.

AECOM, 2023. Revised Supplemental Phase 1A Cultural Resource Assessment Report for the Housatonic Rest of River. Prepared for General Electric Company, Pittsfield, Massachusetts. March 2023.

AECOM, 2023. GE-Pittsfield/Housatonic River Site, Rest of River, Phase IB Cultural Resources Survey Work Plan for Reach 5A. Prepared for General Electric Company. September 2023. <https://semspub.epa.gov/work/01/677550.pdf>.

Arcadis. On-Site and Off-Site Transportation and Disposal Plan. Housatonic River – Rest of River. Pittsfield, MA. Prepared for General Electric Company. October 2023. <https://semspub.epa.gov/work/01/677632.pdf>.

Arcadis. Revised On-Site and Off-Site Transportation and Disposal Plan. Housatonic River – Rest of River. Pittsfield, MA. Prepared for General Electric Company. October 2024. <https://semspub.epa.gov/work/01/685776.pdf>.

AECOM. Phase 1B Cultural Resources Survey Report for Reach 5A. Prepared for General Electric Company. January 2025. <https://semspub.epa.gov/src/document/01/688234>.

Anchor QEA (Anchor QEA, LLC), AECOM and Arcadis. Final Revised Rest of River Statement of Work. Prepared for the General Electric Company. September 2021. <https://semspub.epa.gov/src/document/01/659938.pdf>.

EPA. Revised Final Permit Modification to the 2016 Reissued RCRA Permit and Selection of CERCLA Remedial Action and Operation & Maintenance for Rest of River. December 2020. <https://semspub.epa.gov/src/document/01/650440.pdf>.

## **TASC Contact Information**

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Protecting the environment for wildlife in support of the natural world that sustains us all.

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April 7, 2025

EPA via email at R1Housatonic@epa.gov

Re: GE's Phase 1B Cultural Resources Survey Report for Reach 5A

Berkshire Environmental Action Team (BEAT) appreciates this opportunity to provide feedback on the General Electric Company's (GE's) Phase 1B Cultural Resources Survey Report for Reach 5A.

BEAT's mission is to work with our community to protect the environment for wildlife in support of the natural world that sustains us all.

BEAT appreciates that EPA is working with members of the Stockbridge-Munsee to include tribal members in fieldwork to inform plans for future remediation efforts.

**Staging area STG-006** occupies 1.22 hectares (3.03 acres) and is located within the George Darey Housatonic Valley Wildlife Management Area located east of the Housatonic River in the southern portion of Reach 5A (Appendix D Figure 22). Appendix D Figure 22 is redacted, so we cannot tell exactly where this staging area is proposed, but BEAT feels strongly that every effort should be made to avoid placing a staging area on the people's land that is supposed to be protected in perpetuity for wildlife. It is impossible to "restore" land that has been compacted by use as a staging area to its former condition. Please, find another location for this staging area.

Thank you for considering our comments.

Sincerely,

Jane Winn, Executive Director

Citizens for PCB Removal comments on Phase IB Cultural Resources Survey Report for Reach 5A – Public Release Version (GE-Pittsfield/Housatonic River Site Rest of River (GECD850))

Submitted 04/07/2025 via email

This document may be the most confusing one for non-technical reviewers that has ever been submitted by GE. Pictures of holes in the ground, pictures of woods, trees and scenery, and really complicated diagrams make this document difficult to comprehend. With redacted information, the actual conclusions of the document remain unclear.

That being stated, CPR wishes to continue to state that the current decisions of the EPA with respect to the Rest of River actions will eventually be determined to be inadequate and will need to be readdressed in the future.

As always, the decision of allowing the placing of the toxic dump in Lee will be seen to be the biggest mistake by EPA. Should that dump actually be created, it must be removed in the future. This has happened in other sites where landfills were created and ultimately were removed.

Cultural Resources are almost never easy to find without extensive research and often do not become apparent until actual work is being performed. Extra care must be taken on a daily basis as new work areas are opened for remediation to ensure that cultural resources are discovered before they are destroyed.