

**Public Input on General Electric's
Phase 1B Cultural Resources Survey Report for Reach 6,
dated January 22, 2026**

January 2026 - March 2026

Public Input ended on March 16, 2026



TOWN OF LEE
32 Main Street, Lee, MA 01238
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R. Christopher Brittain,
Town Administrator

March 2, 2026

Mr. Josh Fontaine
EPA New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

Dear Mr. Fontaine:

On behalf of the Select Board and PCB Advisory Committee, please see the following comments from the Town of Lee regarding the *Baseline Monitoring Program (BMP)*.

OVERVIEW

The Phase IB Cultural Resources Survey Report for Reach 6 provides a concise description of the Phase IB cultural resources and historic structures survey results for the terrestrial areas within the Reach 6 remedy area. As stated within the document, the aquatic areas could not be accessed during the 2025 survey field season, therefore these results will be provided as an addendum to the report at a later date. Listed below are potential issues associated with the document, including the potential need to further evaluate remedial impacts in the Rest of River portion of the Site to the Lenox Railroad Station (the only historic resource identified within Reach 6) and to clarify the exclusion criteria for shovel test pit location selection.

TOWN OF LEE COMMENTS

1. The Reach 6 area includes one potential vernal pool (6-VP-1), in the northeast area, close to the eastern shore of Woods Pond (Figure 1-3 of the Baseline Restoration Assessment Report, pdf page 146). The Reach 6 Phase IB Cultural Resources Survey does not mention this feature, even though it would occur in an area with “high terrestrial sensitivity” for cultural resources (Figure 4, pdf page 20 of the Phase IB Cultural Resource Assessment Work Plan for Reach 6). The absence of information pertaining to this vernal pool is particularly concerning since the Reach 5A Phase IB Cultural Resource Assessment Work Plan indicated (and may set a precedent) that vernal pools and other inundated/saturated areas are to be excluded from forthcoming Phase IB surveys.

The Town requests that the document should be amended to include a description of the proposed cultural resource survey methods to be used for the vernal pool (6-VP-1) in Reach 6.

2. The document acknowledges the need to conduct aquatic and geomorphic surveys in the future to identify submerged landscapes. Field conditions during the terrestrial surveys yielded low surface visibilities and “one floodplain remediation area (REM-002) remained inundated through the summer and fall of 2025” (pdf page 14). REM-002 occurs within the Floodplain Removal Area associated with Exposure Area 58 (Figure 4-5a, GE-Pittsfield/Housatonic River Site Rest of River Conceptual Remedial Design/Remedial Action Work Plan for Reach 6, pdf page 135). This removal area is referred to as a floodplain soil. However, given the observations noted by AECOM, this area is frequently inundated and may more appropriately be defined as a shoreline sediment source area. As such, the volume of this removal area may need to be addressed as part of Reach 6 sediment management during the remedial action.

The Town request that the waste material to be removed from REM-002 should be treated as sediment during the remedial action.

3. The in-field survey approach for Reach 6 shovel test pits is very thorough. As shown in Figures 3.1 and 3.2 (pdf pages 26 and 30), a substantial number of sites were considered for completing shovel test pit. However, based on in-field observations only one shovel test pit was excavated in REM-001 and REM-003. The remainder of the potential test pit locations were excluded due to characteristics such as “access road, disturbed, previously excavated, and slope.” It is not clear, however, why these characteristics exclude the occurrence of a shovel test pit. It would be useful if the document defined these exclusive conditions. For instance, does the slope cause refilling of a test pit, or create a field hazard? Furthermore, it is not clear why the presence of disturbance would exclude the usefulness of a shovel test pit. The presence of disturbance may signify a point that would reveal cultural resources at a deeper profile.

The Town requests that the document be revised to include definitions of shovel test pit exclusion criteria shown in Figures 3.1 and 3.2.

4. The document refers to the presence of a dry-laid stacked stone wall (associated with STG-003, pdf pages 39 and 41). The document describes the location but does not describe whether this feature is a potential cultural resource.

The Town requests that the document provide a cultural characterization of the noted dry-laid stacked stone wall located within STG-003.

5. Throughout the course of community reviews of various Rest of River documents, the community has expressed concern that other appropriate reviews by stakeholders should be conducted. In response, it has been shown that other stakeholders are involved and are actively providing feedback and guidance to the Rest of River process. In this instance, it appears that there are stakeholders such as the Tribes and Massachusetts Historical Commission who have reviewed or are communicating with GE and EPA on this document and other cultural and historic resource-related documents. It would be useful for the community to understand the correspondence and accommodation provided to stakeholders to gain an assurance that GE is meeting the concerns of these stakeholders.

The Town requests that a method be provided to better understand how other stakeholder concerns are being met by Rest of River document reviews and that the community can have access to the correspondence between GE, EPA and these stakeholders.

6. Section 5 provides a summary of the document findings and states that “if unanticipated archaeological resources are encountered during remediation activities, the project’s unanticipated discovery plan will include provisions to stop all work in the vicinity of the archaeological finds until those resources can be evaluated and documented by an archaeologist” (pdf page 57). This cautionary step is appreciated and will help address any impact to cultural resources.

The Town requests the presence of an on-site clearance reviewer during surface clearing operations to be conducted at Reach 6 during forthcoming remedial actions.

7. Review of the document identified several potential editorial recommendations as follows:
- The document addresses “a portion of the hydraulic transport pipeline from shoreline support facility to the Upland Disposal Facility (UDF) located near Woods Pond but outside the floodplain” (pdf page 15). The pipeline footprint and its impacts to cultural resources have been an expressed concern of the community. It seems that the document only addresses a portion of the pipeline because (perhaps) the remainder of the pipeline occurs within the UDF footprint which has been thoroughly evaluated for cultural resources within a separate document (AECOM, 2022). It is difficult for reviewers to track how all elements of the Rest of River project are separated or combined. Therefore, it may be useful to acknowledge that the pipeline footprint in its entirety from Woods Pond to the UDF has been addressed.
 - The shovel test pit labels are not provided in Figure 3.1 (pdf page 26) for STG 003, whereas shovel test pit labels are shown for STG 001 and 002 in Figure 3.2 (pdf page 30). It would be useful to understand the location identifiers for each of the shovel test pits in STG 003.

The Town requests that the document be amended to address these issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Brittain', enclosed in a light gray rectangular box.

R. Christopher Brittain
Town Administrator



Technical Assistance Services *for* Communities GE-Pittsfield/Housatonic River Site Comments on Phase IB Cultural Resources Survey Report for Reach 6 January 2026

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 (TASC)
Comments on Phase IB Cultural Resources Survey Report for Reach 6
January 2026**

Introduction

This document provides TASC comments on the Phase IB Cultural Resources Survey Report for Reach 6 of the GE-Pittsfield/Housatonic River Site. This document is for the Berkshire Regional Planning Commission (BRPC), the city of Pittsfield, Massachusetts Audubon and other entities 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 portion of the GE-Pittsfield/Housatonic River site, GE is required to propose and conduct a Phase IB cultural resources survey of portions of the Rest of River portion of the Superfund site that will be affected by cleanup activities or cleanup support activities and that contain or have a high potential to contain cultural resources.

GE submitted the Phase IB Cultural Resources Survey Work Plan for Reach 6 to EPA in November 2024 and EPA conditionally approved the work plan in March 2025. Reach 6 is in Lenox and Lee, Massachusetts, and contains Woods Pond and associated areas. In July and August 2025, GE conducted a terrestrial archaeological survey and an historic architectural study in Reach 6 of the Housatonic River, documented in this January 2026 Phase IB Cultural Resources Survey Report for Reach 6. The planned archaeological survey for aquatic areas and for a submerged floodplain could not be completed as planned and has been deferred to spring 2026. Once the remaining aquatic survey activities are completed, the results will be presented in an addendum to the January 2026 Phase IB Cultural Resources Survey Report for Reach 6.

Summary

The January 2026 Phase IB Cultural Resources Survey Report for Reach 6 has six sections:

1. Introduction and Background
2. Phase IB Archaeological Survey Research Areas and Methods
3. Results of Phase IB Archaeological Survey
4. Historic Architectural Survey
5. Summary
6. References

The Cultural Resources Survey area centers around Woods Pond and included surveying for potential cultural resources in planned cleanup and staging areas. The terrestrial archaeological survey area included one planned cleanup area and three supporting areas: the shoreline, a portion of the hydraulic pipeline corridor, and the area where the Woods Pond rail spur was initially configured at the time of the 2024 Cultural Resources Survey Work Plan. These four areas had previously been classified as having high archaeological sensitivity. The terrestrial archaeological survey did not identify any potential cultural resources or artifacts.

Since no archaeological sites were encountered in the survey, the report recommends no further terrestrial archaeological studies. However, the Woods Pond rail spur area has been expanded since the 2024 Cultural Resources Survey Work Plan and additional terrestrial archaeological survey activities for potential cultural resources will be incorporated into the upcoming conceptual design for the rail spur area. In addition, the final cleanup plan will include provisions for unanticipated discovery of archaeological finds, including stopping all work in the area until the resource can be evaluated and documented by an archaeologist.

The historic architectural survey assessed the potential impact of the cleanup on the Lenox Railroad Station, which is listed on the National Register of Historic Places. The assessment of the Lenox Railroad Station determined that cleanup activities are not expected to have adverse effects on the station. The survey also identified four additional resources, but these structures were not deemed significant and were not eligible for protection under the National Register of Historic Places. These four structures were not assessed.

The aquatic architectural survey and geomorphic study to identify submerged areas of interest could not be completed as planned due to low surface visibility and high water level conditions. This portion of the survey will be completed in spring 2026 and the results will be documented in an addendum to the January 2026 survey report.

TASC Comments

The Phase IB Cultural Resources Survey Report for Reach 6 provides a concise description of the Phase IB cultural resources and historic structures survey results for the terrestrial areas within the Reach 6 remedy area. As stated within the document, the aquatic areas could not be accessed during the 2025 survey field season, therefore these results will be provided as an addendum to the report at a later date. In general, the document is well-founded, follows the agreed-upon Reach 6 Phase IB Cultural Resources Survey Work Plan (AECOM, 2024b), and adheres to requirements set forth in the Statement of Work and the Revised Final Permit. TASC identified possible issues associated with the document, including the potential need to further evaluate remedial impacts in the Rest of River portion of the Site to the Lenox Railroad Station (the only historic resource identified within Reach 6) and to clarify the exclusion criteria for shovel test pit location selection.

Specific TASC comments are presented below:

1. In January 2025, TASC reviewed and commented on the Reach 6 Phase IB Cultural Resources Survey Work Plan (AECOM, 2024b) and identified a question regarding the treatment of vernal pools within the cultural resource survey process. The Reach 6 area includes one potential vernal pool (6-VP-1), in the northeast area, close to the eastern shore of Woods Pond (Figure 1-3 of the Baseline Restoration Assessment Report, pdf page 146). The Reach 6 Phase IB Cultural Resources Survey does not mention this feature, even though it would occur in an area with “high terrestrial sensitivity” for cultural resources (Figure 4, pdf page 20 of the Phase IB Cultural Resource Assessment Work Plan for Reach 6). The absence of information pertaining to this vernal pool is particularly concerning since the Reach 5A Phase IB Cultural Resource Assessment Work Plan indicated (and may set a precedent) that vernal pools and other inundated/saturated areas are to be excluded from forthcoming Phase IB surveys.

The community may want to ask EPA if the document should be amended to include a description of the proposed cultural resource survey methods to be used for the vernal pool (6-VP-1) in Reach 6.

2. The document acknowledges the need to conduct aquatic and geomorphic surveys in the future to identify submerged landscapes. Field conditions during the terrestrial surveys yielded low surface visibilities and “one floodplain remediation area (REM-002) remained inundated through the summer and fall of 2025” (pdf page 14). REM-002 occurs within the Floodplain Removal Area associated with Exposure Area 58 (Figure 4-5a, GE-Pittsfield/Housatonic River Site Rest of River Conceptual Remedial Design/Remedial Action Work Plan for Reach 6, pdf page 135). This removal area is referred to as a floodplain soil. However, given the observations noted by AECOM, this area is frequently inundated and may more appropriately be defined as a shoreline sediment source area. As such, the volume of this removal area may need to be addressed as part of Reach 6 sediment management during the remedial action.

The community may want to ask EPA if the waste material to be removed from REM-002 should be treated as sediment during the remedial action.

3. The in-field survey approach for Reach 6 shovel test pits is very thorough. As shown in Figures 3.1 and 3.2 (pdf pages 26 and 30), a substantial number of sites were considered for completing shovel test pit. However, based on in-field observations only one shovel test pit was

excavated in REM-001 and REM-003. The remainder of the potential test pit locations were excluded due to characteristics such as “access road, disturbed, previously excavated, and slope.” For the reviewer, it is not clear why these characteristics exclude the occurrence of a shovel test pit. It would be useful if the document defined these exclusive conditions. For instance, does the slope cause refilling of a test pit, or create a field hazard? Furthermore, it is not clear why the presence of disturbance would exclude the usefulness of a shovel test pit. The presence of disturbance may signify a point that would reveal cultural resources at a deeper profile.

The community may want to ask EPA if the document could be revised to include definitions of shovel test pit exclusion criteria shown in Figures 3.1 and 3.2.

4. The document refers to the presence of a dry-laid stacked stone wall (associated with STG-003, pdf pages 39 and 41). The document describes the location but does not describe whether this feature is a potential cultural resource.

The community may want to ask EPA if the document needs to provide a cultural characterization of the noted dry-laid stacked stone wall located within STG-003.

5. The document thoroughly provides an inventory and assessment of an identified resource in the Historic Architectural Area of Potential Effects (APE). This resource, the Lenox Railroad Station (LEN.322), was previously listed on the National Register of Historic Places. As per assessment of this feature, AECOM concluded “there would be no adverse effect” attributable to the remedial action of Reach 6. The Lenox Railroad Station encompasses the proposed “Woods Pond Spur transload area” (shown in Figure 1.4, pdf page 20), which will service rail transport of Rest of River-generated waste through the course of multiple Reach remedial activities. While it is recognized that the Lenox Railroad Station was built to support rail activities; the proposed Rest of River-related remedial action efforts may pose a unique set of ground-vibration and sound-vibration disturbances that may require monitoring of the structure. An inventory (visual and quantifiable) of foundation and structure-related fissures before, during and after the Rest of River activities could provide a measure of these disturbances.

The community may want to ask EPA whether Rest of River-related ground-vibration and sound-vibration impacts should be monitored during remedial activities.

6. Throughout the course of community reviews of various Rest of River documents, the community has expressed concern that other appropriate reviews by stakeholders should be conducted. In response, it has been shown that other stakeholders are involved and are actively providing feedback and guidance to the Rest of River process. In this instance, it appears that there are stakeholders such as the Tribes and Massachusetts Historical Commission who have reviewed or are communicating with GE and EPA on this document and other cultural and historic resource-related documents. It may be useful for the community to understand the correspondence and accommodation provided to stakeholders to gain an assurance that GE is meeting the concerns of these stakeholders.

The community may want to ask EPA if there is a method by which they can better understand how other stakeholder concerns are being met by Rest of River document reviews and if the community can have access to the correspondence between GE, EPA and these stakeholders.

7. Section 5 provides a summary of the document findings and states that “if unanticipated archaeological resources are encountered during remediation activities, the project’s unanticipated discovery plan will include provisions to stop all work in the vicinity of the archaeological finds until those resources can be evaluated and documented by an archaeologist” (pdf page 57). This cautionary step is appreciated and will help address any impact to cultural resources. TASC would recommend that GE have a continuous on-site “resource clearance” observer during surface clearing operations given that so much of Reach 6’s surface has yet to be observed due to natural or man-made cover.

The community may want to ask EPA if an on-site clearance reviewer should be present during surface clearing operations to be conducted at Reach 6 during forthcoming remedial actions.

8. Review of the document identified several potential editorial recommendations as follows:
 - The document addresses “a portion of the hydraulic transport pipeline from shoreline support facility to the Upland Disposal Facility (UDF) located near Woods Pond but outside the floodplain” (pdf page 15). The pipeline footprint and its impacts to cultural resources have been an expressed concern of the community. It seems that the document only addresses a portion of the pipeline because (perhaps) the remainder of the pipeline occurs within the UDF footprint which has been thoroughly evaluated for cultural resources within a separate document (AECOM, 2022). It is difficult for reviewers to track how all elements of the Rest of River project are separated or combined. Therefore, it may be useful to acknowledge that the pipeline footprint in its entirety from Woods Pond to the UDF has been addressed.
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The community may want to ask EPA if the document can be amended to address these issues.

In addition, TASC suggests confirming with EPA whether the report addendum will be shared with site stakeholders once available, and whether EPA will accept comments from the community on the addendum.

References Cited

AECOM, 2024a. Baseline Restoration Assessment Report for Housatonic Rest of River Reach 6. Prepared for General Electric Company. October 2024.

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