

Public Input on General Electric's September
28, 2023 Phase IB Cultural Resources Survey
Work Plan for Reach 5A

January 2024

Phase IB Cultural Resources Survey Work Plan for Reach 5A

Rivers and waterways have always been focal points in the advancement of human civilization. So too the Housatonic River was an essential part of the Native American existence along its path through Massachusetts and Connecticut. More than just a means of sustenance, its waters and abundance were sources for heritage, spirituality and traditions.

There is no question that the banks and floodplains of the Housatonic were used by many Native Americans for rituals, celebrations, villages and even resting places for those who had passed on.

It is imperative that prior to any future work along or in the river that a more thorough investigation be completed to discover “any potentially significant cultural resources . . . , including areas that need field investigations to make that determination”. CPR does not believe that the work plan goes far enough in this process.

With the likelihood that it may take two years before any remediation activities will begin, CPR strongly urges GE and EPA to use an exciting technology called LIDAR (LIDAR Scanning or Mapping) being used by archeologists for a project called The Earth Archive (www.theeartharchive.com).

Here is an excerpt from <https://www.sapiens.org/archaeology/lidar-mapping-earth/>

“What lidar data provides is not a flat image but instead a dense, three-dimensional cloud of points recording the Earth’s surface and everything on it in incredible detail. Using computer software, researchers can filter the point cloud to identify features such as trees, geological fault lines, hydrological elements, and much more. Using 3D visualization technologies, researchers can actually walk through the resulting “point cloud.”

“Because traditional archaeological methodologies are so time intensive, the richest information that academics have about the past is limited to a handful of impressive case studies laboriously collected over decades by dedicated researchers. This means that there is much left to be explored. Wherever archaeologists point a lidar instrument—whether it’s around a known site or a completely unexplored region—we unveil amazing and previously undocumented finds. Our archaeological universe is going through its own big bang.”

This technology will create a permanent digital point in time for the Housatonic River prior to any future remediation. It will also assist in verifying that post remediation will meet the goals established in the Rest of River process.

This is our one chance to get things right for our Housatonic River and its historically important cultural resources. When looking at the vast amounts of monies that will be spent on this project, it seems that this will be inconsequential to the total outlay. It is SO IMPORTANT.

Start with Reach 5A and complete the same LIDAR mapping for Rest of River. It would also be an important archive if this was done to the Housatonic that flows through Connecticut to the Long Island

Sound. You can even go back and map the ENTIRE Superfund site including the first half mile, the next mile-and a half, the GE plant site, Unkamet Brook and the location of the UDF.

We MUST use every technology at our disposal.

Charles Cianfarini

Interim Executive Director

Citizens for PCB Removal

Dear Dan,

Thank you for the Reach 5A Phase IB Cultural Resources Survey Work Plan.

Generally, the work plan looks good to us with the follow recommendations:

- 1) The Stockbridge-Munsee Community Inadvertent Discovery Policy should be followed: <https://www.mohican.com/mt-content/uploads/2022/09/smc-inadvertent-discovery-policy.pdf> or its strictures incorporated into the Unanticipated Discoveries protocols on page 25.
- 2) Open lines of communication/consultation with us should be explicitly described: a) Work schedules made available at least a week before so that site visits can be worked into our calendar; b) crew chief contact info provided with permission to communicate granted; c) routine (brief) daily updates; d) SMC THPO should be contacted immediately if suspicious finds are encountered, such as a whole or nearly whole ceramic vessel or unusual concentrations of artifacts or features.

Thank You,
Jeff

Jeffrey C Bendremer Ph.D., RPA
Tribal Historic Preservation Officer
Stockbridge-Munsee Community
Tribal Historic Preservation Extension Office

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Chris,

Thank you for the Phase 1B Cultural Resources Survey Work Plan for Reach 5A. The Housatonic River drainage, including this project's entire APE, constitutes an important locus of historic Mohican settlement and a significant portion of the traditional Stockbridge-Munsee Homeland. We would associate any Native American archaeology discovered in the Housatonic drainage in the State of Massachusetts with Mohican ancestors.

The Stockbridge-Munsee Community Tribal Historic Preservation Office has the following comments to be written into the plan as follows:

- 1) We request explicate authorization to visit and monitor the archaeological work on-site, view archaeological finds *in situ*, and/or visit the lab facility as our schedule allows;
- 2) We request explicate permission to communicate directly with the archaeological contractor as necessary to arrange visits, on-site monitoring and to discuss the nature of any finds;
- 3) We request that, when any Native American material culture, feature(s) or other Indigenous archaeological finds are encountered, we be informed immediately;
- 4) We request that, in the event of a work stoppage due to archaeology, we be informed immediately;
- 5) We request that, in the event that a Native American burial, suspected burial, grave good(s) or sacred object(s) is encountered, we be informed immediately.
- 6) We request that the Stockbridge-Munsee Community Treatment and Disposition of Human Remains and Cultural Items/Inadvertent Discovery protocol be followed:
<https://www.mohican.com/mt-content/uploads/2022/09/smc-inadvertent-discovery-policy.pdf> in the event a burial is encountered.

Lastly, I am concerned that the Environmental Protection Agency is not fulfilling the United States Government's trust responsibilities vis-à-vis the tribes by including the Stockbridge-Munsee Community in its blanket public outreach communications. As a sovereign nation, the Stockbridge-Munsee Community is not a 'public,' and expects to enjoy a government-to-government relationship with agencies of the United States. Therefore, we respectfully request that consultation with the tribe be conducted directly and outside of public channels.

Thank you for your kind consideration of these comments.

Warmly,

Jeff

Jeffrey C Bendremer Ph.D., RPA

Tribal Historic Preservation Officer

Stockbridge-Munsee Community

Tribal Historic Preservation Extension Office

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



www.mohican.com