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Via Electronic Mail

January 17, 2022

Mr. Dean Tagliaferro
EPA Project Coordinator
U.S. Environmental Protection Agency
c/o HDR, Inc.
10 Lyman Street, Suite 2
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Rest of River (GECD850)
Supplemental Phase IA Cultural Resources Assessment Work Plan**

Dear Mr. Tagliaferro:

In accordance with the approved Final Revised Rest of River Statement of Work for the Rest of River, enclosed for EPA's review and approval is GE's *Supplemental Phase IA Cultural Resources Assessment Work Plan*, prepared for GE by AECOM.

Please let me know if you have any questions about this Work Plan.

Very truly yours,

Kevin G. Mooney
Senior Project Manager – Environmental Remediation

Enclosure

Cc: (via electronic mail)
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Public Information Repository at David M. Hunt Library in Falls Village, CT
GE Internal Repository



January 2022
Housatonic River – Rest of River

AECOM

Supplemental Phase IA Cultural Resources Assessment Work Plan

Prepared for General Electric Company
Pittsfield, Massachusetts

January 2022
Housatonic River – Rest of River

Supplemental Phase IA Cultural Resources Assessment Work Plan

Prepared for
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ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
ARARs	Applicable or Relevant and Appropriate Requirements
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cm	centimeter
CRA	Cultural Resources Assessment
EPA	U.S. Environmental Protection Agency
Final Revised SOW	<i>Final Revised Rest of River Statement of Work</i>
GE	General Electric Company
GIS	Geographic Information System
m	meters
MACRIS	Massachusetts Cultural Resource Information System
MBUAR	Massachusetts Board of Underwater Archaeological Resources
MHC	Massachusetts Historical Commission
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
PAL	Public Archaeology Laboratory, Inc.
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
TCP	Traditional Cultural Property
UDF	Upland Disposal Facility

1 Introduction and Background

1.1 Introduction

Pursuant to Section II.H.15 of the Revised Final Resource Conservation and Recovery Act (RCRA) Permit Modification (Revised Permit) issued by the U.S. Environmental Protection Agency (EPA) to the General Electric Company (GE) on December 16, 2020 for the Rest of River (ROR) portion of the GE-Pittsfield/Housatonic River Site and Section 4.2.1.7 of GE's *Final Revised Rest of River Statement of Work* (Final Revised SOW; Anchor QEA et al. 2021), approved by EPA on September 16, 2021, GE is required to prepare a work plan to conduct a Supplemental Phase IA Cultural Resources Assessment (CRA) of areas that will be affected by the ROR Remedial Action selected by EPA in the Revised Permit. In accordance with those requirements, this document provides GE's Supplemental Phase IA CRA Work Plan.¹ It describes the process and activities that GE will conduct to begin to identify potentially affected ROR areas that contain known cultural resources or have a high potential to contain such resources. This work will also delineate upland areas with known or suspected historic structures that might be indirectly affected by project activities.²

1.2 Background

In 2008, GE submitted to EPA a report entitled *Initial Phase IA Cultural Resources Assessment (CRA) for the Housatonic Rest of River Project* (URS 2008; Initial Phase IA CRA Report). The Initial Phase IA CRA was conducted to assess the potential for archaeological and historical resources (jointly referred to herein as cultural resources) to exist in the portions of the Housatonic River and its floodplain that could potentially be affected by implementation of Corrective Measures selected by EPA – namely, Reaches 5 through 8. That assessment was conducted consistent with Section 106 of the National Historic Preservation Act (NHPA) and federal and state regulations (36 CFR Part 800; 950 CMR 71.00). It preliminarily identified an Archaeological Area of Potential Effects (APE) as the potentially affected river, shoreline, and floodplain areas; and it also noted that a Historic Architectural APE would encompass historic properties that are located within the Archaeological APE or may be impacted by remedial activities. The Initial Phase IA CRA Report included: (1) background information on the environmental setting, pre-history, and history of the project area and region; (2) description of previous cultural resource studies and types of known cultural

¹ Although the Revised Permit is currently being appealed by other parties to the EPA Environmental Appeals Board, GE agreed in a February 10, 2020 Settlement Agreement to submit the SOW and, subject to EPA approval, to perform the investigation and design work specified in the SOW as contractual obligations under that agreement, unless and until EPA issues a further revised permit that is not substantially similar to the current Revised Permit. This includes the submission and implementation of this Supplemental Phase 1A CRA Work Plan.

² As discussed in Section 4.2.2 of the Final Revised SOW, the Upland Disposal Facility (UDF) site and UDF support area to be used in the Remedial Action will be subject to a separate CRA, which is described in the Pre-Design Investigation Work Plan for the UDF (Arcadis and AECOM 2021), submitted to EPA on November 24, 2021.

resources within the Archaeological APE; (3) a preliminary assessment of the potential for each section of the Archaeological APE to contain as-yet unidentified cultural resources; and (4) an outline of future steps under the NHPA to evaluate potential impacts on cultural resources once the scope and extent of remedial action have been determined. On September 9, 2008, EPA provided comments on the Initial Phase IA CRA Report, and on March 5, 2009, GE provided a response to those comments.

As indicated in the Initial Phase IA CRA Report (page 71), the next step in the CRA process is the submission of a supplemental work plan for additional Phase IA investigations following identification of the extent of areas subject to remediation. Phase IA of the CRA process consists of literature searches and a desktop assessment of the archaeological sensitivity of the project area and the potential for historic structures to be present and affected. Because the extent of remediation was not known at the time of the 2008 Initial Phase IA CRA Report, it is necessary to update that assessment now that the general extent of remedial activities is known. Thus, the SOW required GE to submit a site-wide Work Plan for a Supplemental Phase IA CRA.³

1.3 Objective of and Requirements for the Supplemental Phase IA CRA

As stated in the SOW, the objective of the supplemental Phase IA CRA is to identify river, riverbank, and floodplain areas within the Archaeological APE with known cultural resources or high potential to contain such resources and upland areas within the Historic Architectural APE with known or suspected historic structures. These APEs will encompass ROR areas where active remediation could potentially occur,⁴ as well as likely associated support areas (including access roads and staging areas) if known. For purposes of this CRA, cultural resources will include archaeological and historical resources 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 NHPA and its regulations, the federal Archaeological and Historic Preservation Act, and the Massachusetts Historical Commission (MHC) 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

³ At this stage of the process, “site-wide” covers areas within the ROR where remediation activities could occur, but not portions where no remediation will occur. See the following footnote.

⁴ The ROR areas where remediation activities could potentially occur include the river channel in Reach 5, the riverbanks in Reaches 5A and 5B, the floodplain in Reaches 5 and 6, the backwaters in Reaches 5-8, the impoundments in Reaches 6, 7, and 8, and the designated Exposure Areas and vernal pools in the Reach 7 floodplain. They do not include the riverbanks downstream of Reach 5B, the flowing portions of Reach 7, other portions of the Reach 7 floodplain, and reaches downstream of Reach 8 – in all of which no remediation is required,

resources will include properties of traditional religious and cultural importance that fall into any of the above categories.

The SOW requires that this Supplemental Phase IA CRA Work Plan describe the additional desktop evaluations, literature searches, and consultations to be conducted to update the 2008 Initial Phase IA CRA, including coordination with the MHC, potential contacts with Native American tribes regarding the locations of Traditional Cultural Properties (TCPs), and other notifications and consultations required by the above-listed ARARs. This Work Plan is also required to describe the updated evaluations to be conducted of the remediation and likely support areas (if known) to assess their potential to contain unidentified potentially significant cultural resources (i.e., whether they have “no,” “low,” or “high” potential to contain such resources). In addition, it is required to describe the activities to be conducted to identify any known or suspected historic structures within the Historic Architectural APE.

For purposes of this Work Plan, the specific Remediation Units (RUs) to be evaluated (referred to as Remediation Areas in the Final Revised SOW) will be those identified in the Overall Strategy and Schedule document, to be submitted by the end of January 2022. However, much information relevant to evaluating the specific cultural impacts of the ROR Remedial Action will not be known at the time of the Supplemental Phase IA CRA – notably, the specific locations to be remediated within many areas (including the Reach 5B and 5C channel, Reach 5A and 5B riverbanks, backwaters, Wood Pond and Rising Pond, floodplain areas, and vernal pools), where the need for and extent of remediation depend on comparing sampling data to criteria in the Revised Permit, as well as the specific locations of support areas such as access roads and staging areas. To the extent that such areas are not covered by this Supplemental Phase IA CRA, they will be assessed for cultural resources at a later time. The procedures for and results of such additional assessments will be included in or attached to appropriate later submittals for the subject RUs (e.g., the Phase IB Cultural Resource Survey Work Plans for procedures and the Phase IB Cultural Resource Survey Reports for results).

1.4 Work Plan Organization

The remainder of this Supplemental Phase IA CRA Work Plan is organized into the following sections:

- Section 2 provides a summary of previous cultural resources inventories and assessments associated with the Housatonic River in the vicinity of the project.
- Section 3 contains a description of proposed procedures to conduct the Supplemental Phase IA CRA so as to update the prior Phase IA CRA for the ROR.
- Section 4 presents the anticipated schedule and reporting for Supplemental Phase IA CRA activities, as well as an overview of the subsequent CRA activities.

2 Summary of Prior Cultural Resource Assessments

2.1 2005 Archaeological Survey of the 1½ Mile Reach

The Public Archaeology Laboratory, Inc. (PAL) conducted an intensive archaeological survey of a portion of the Housatonic River in Pittsfield in 2005 in connection with EPA's performance of remediation in the portion of the river known as the 1½ Mile Reach. A report on that survey was submitted to the U.S. Army Corps of Engineers and EPA in January of 2006 (PAL 2006). The project area included both sides of the Housatonic River from the Pomeroy Avenue Bridge to the confluence of the East and West Branches. Field investigations included the excavation of 62 fifty-centimeter (cm) shovel test pits at 10-meter intervals along the river floodplain. No evidence of any archaeological sites was identified or recovered during the survey.

2.2 2008 Cultural Resources Assessment for the Rest of River

As discussed in Section 1.2, GE submitted to EPA in March 2008 the Initial Phase IA CRA Report, prepared for GE by URS Corporation (now AECOM). That report was submitted in conjunction with GE's Corrective Measures Study Report on the Rest of River. The Initial Phase IA CRA Report provided an initial assessment of the potential for cultural, archaeological, and historical resources to exist in portions of the Housatonic River and its floodplain that could be impacted by the implementation of remedial actions selected by EPA to address the sediments and floodplain soils in the Rest of River area. It also outlined future steps that could be taken to further assess such resources in the area once the scope and extent of remediation for the Rest of River had been determined. That report was described in more detail in Section 1.2.

3 Procedures to Update the 2008 CRA

3.1 Identification of Areas of Potential Effects Definitions

A revised Archaeological APE and a Historic Architectural APE will be developed based on the scope and extent of remediation as currently known.⁵ The Archaeological APE will encompass those areas of the river channel, shoreline, impoundments, backwaters, and adjacent floodplain that may be experience disturbance as a result of remediation activities. This APE will also include the likely locations of access roads and staging areas to the extent known. The Historic Architectural APE will encompass the Archaeological APE as well as adjacent locations within sight of areas involved in remediation. This APE will also include areas which could be indirectly impacted by factors such as noise, vibration from equipment, or vehicle movements associated with the remediation.

3.2 Identification of Resources Subject to Assessment

In accordance with the SOW, the resources subject to assessment will include resources subject to the pertinent ARARs listed in the Revised Permit (as specified in Section 1.3) and potentially significant cultural resources (as defined in Section 1.3). These resources will also include properties of traditional religious and cultural importance that fall into any of the above categories.

3.3 Collection of Background Data

Desktop and on-line evaluations will be conducted of the MHC's report files and data bases, including the Massachusetts Cultural Resource Information System (MACRIS), Massachusetts State Historic Preservation Plan, and MHC State Reconnaissance Survey Reports, to determine whether the Archaeological APE or Historic Architectural APE contains cultural resources included in those data bases, and to gather data on known cultural resources in the region near the APEs to help refine assessments of the potential for as-yet-unidentified resources to be affected by the ROR remediation project. Desktop and on-line evaluations will also be conducted of the archives and databases of local Historic District Commissions, Historical Societies, and libraries for the same purpose. Potential sources include, but are not limited to:

- Massachusetts Archives and Massachusetts Historical Commission, Boston, MA
- Massachusetts Board of Underwater Archaeological Resources, Boston, MA
- Berkshire County Historical Society, Pittsfield, MA
- The Berkshire Athenaeum – Pittsfield, MA

⁵ The areas potentially subject to remediation are described above in footnote 4. As also noted above, the property to be used for the UDF and UDF support area will be subject to a separate initial CRA, as described in GE's separate Pre-Design Investigation Plan for the UDF.

- Berkshire Museum – Pittsfield, MA
- Lee Library Association, Lee, MA
- Lenox Library Association, Lenox, MA
- Lenox Historical Commission
- Stockbridge Historic Preservation Commission
- Stockbridge Library, Stockbridge, MA
- Great Barrington Historical Society

These sources will be reviewed for information on the area's prehistory and history. Typical sources will include reports, articles, papers, reports, and volumes on archaeological and architectural history investigations within the region, as well as historic maps and atlases. Published works on the history of the area will be examined. Other sources to be consulted included unpublished monographs and reports, historical architecture files, documentary photographs, county atlases, and fire insurance maps. The focus of this background historical research will be to reconstruct historic and modern land use within the Archaeological APE, and identify the general locations of recorded historic structures, roads, rail lines, and districts. Various maps will be examined, including historic topographic maps, current 7.5' USGS quadrangle maps; and geologic maps. Current and historic aerial photographs will be reviewed to note natural and human-induced changes to river-associated landforms.

3.4 Consultation

Section 106 of the NHPA requires federal agencies to engage in formal consultation with certain groups and individuals, known as consulting parties. Consulting parties may include other federal agencies with an involvement in the project, State Historic Preservation Offices (SHPOs), Tribal Historic Preservation Offices, local governments, and individuals and organizations with demonstrated interest in the undertaking. This outreach will be an ongoing aspect of the cultural resources compliance process for the ROR remediation project and will likely involve multiple episodes of correspondence and meetings as remediation plans are refined and topics of concern are identified.

The CRA research will include outreach to consulting parties to assist in identifying the locations of cultural resources and traditional cultural properties in the vicinity of the ROR APEs. This will be conducted mainly on behalf of GE. However, formal consultation with sovereign native tribes is a government-to-government function that can only be done by a federal agency, in this case EPA. Required and potential consulting parties include:

- MHC
- Massachusetts Board of Underwater Archaeological Resources (MBUAR)
- Local governments and historic preservation organizations in Pittsfield, Lee, Lenox, Stockbridge, and Great Barrington (see list in Section 3.3)
- Tribal Historic Preservation Offices
 - Stockbridge Munsee Band of Mohican Indians
 - Wampanoag Tribe of Gay Head (Aquinnah)
 - Schaghticoke Tribal Nation
 - Schaghticoke Indian Tribe

3.5 Evaluations to Assess Archaeological Potential

An evaluation will be conducted of the Archaeological APE for the potential to contain unidentified potentially significant archaeological resources (as defined in Section 1.3) – i.e., whether they have no, low, or high potential to contain such resources. This evaluation will be conducted using the same approach previously developed for the 2008 Initial Phase IA CRA (based on Glover et al. 1994), which incorporated data layers for soil types, slope, land use, and the location of known archaeological sites within a GIS database. As outlined in Initial Phase IA CRA, that approach uses the following key variables to identify an area’s potential to contain pre-contact archaeological resources:

- High Potential
 - water source within 150 meters (m)
 - well drained sandy soils
 - level to fairly level topography (0 – 3%)
 - none to minimal disturbance
 - known sites in the immediate area
- Moderate Potential
 - water source within 150 to 300 m
 - well drained to fairly well drained, sandy to cobbley soils
 - moderate slopes (3 – 8%)
 - minimal to moderate disturbance
 - known sites in the vicinity
- Low Potential
 - water source greater than 300 m
 - poorly drained soils
 - steep slopes (> 8%)
 - moderate to extensive disturbance

- no known sites in the vicinity

In addition, for historic-period archaeological sites, areas within 100 m of major historic transportation networks will be added as high potential areas.

This sensitivity assessment will be useful for evaluating the relative archaeological potential of large areas for project planning purposes, but the location-specific criteria will then need to be reviewed and applied to the areas subject to remediation to make final determinations concerning the need for systematic field surveys in a given area. For example, specific former structure locations depicted on historic maps need to be reviewed, and visual evidence of past land use and disturbances assessed. In addition, the sensitivity model will require validation through field sampling, as appropriate, in subsequent stages of the CRA process.

3.6 Evaluations to Identify Historic Architectural Resources

Evaluation of known or suspected historic structures within the Historic Architectural APE will be accomplished by starting with existing historic structure inventories compiled by the MHC and local historic organizations. These data will be collected in conjunction with the background research conducted as described in Section 3.3. The locations of these structures will be plotted in the project GIS system for systematic comparison with the areas potentially subject to remediation and likely associated support areas to the extent known.

Following compilation of the existing inventory data, a reconnaissance-level windshield survey will be conducted by a qualified architectural historian to field verify the current status of each previously recorded resource and to identify other potential historic structures within the APE. This reconnaissance survey will not constitute a comprehensive survey to fully document each resource. It will serve to compile a preliminary inventory of potential historic structures that will be examined more closely in a later Phase IB Cultural Resources Survey (see Section 4).

3.7 Compliance with ARARs

As noted in Section 1.3, 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 required by EPA, this section discusses how the Supplemental Phase IA CRA activities will comply with the substantive provisions of the identified ARARs.

Federal ARARS

Section 106 of the NHPA (54 U.S.C. 300101 *et seq.*) 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 ARARs guidance under CERCLA (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 SHPO, and the Advisory Council on Historic Preservation (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 Supplemental Phase IA CRA will comply with these federal ARARs by documenting the consultations, literature searches, and desktop assessments undertaken to evaluate the archaeological sensitivity of the project area and the potential for historic structures to be present and potentially affected.

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 Supplemental Phase IA CRA will comply with these state ARARs by documenting the consultations, literature searches, and desktop assessments undertaken 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 project area and could potentially be affected by the ROR Remedial Action.

4 Schedule, Reporting, and Next Steps

Data collection and analysis for the Supplemental Phase IA CRA will be completed within three months of EPA approval of this Work Plan. GE will then prepare and submit a site-wide Supplemental Phase IA CRA Report to present the results. That report will be submitted within six months of approval of this Work Plan. The report will be prepared to meet the standards of the MHC reporting guidelines (950 CMR 70.14) and will comply with the ARARs listed in Section 1.3. 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, analyses and discussion, conclusions and recommendations for further work (if any), bibliography, and lists of tables, figures, and photographs. All figures and photographs will be prepared consistent with professional practices and the State Archaeologist's memorandum on cartography and photography. The report will also include a discussion and the results of the repositories that have been visited and knowledgeable individuals consulted.

To the extent that the Supplemental Phase IA CRA Report identifies any known and potentially significant cultural resources within the Archaeological APE or any known or suspected historic structures within the Historic Architectural APE, or indicates that the areas subject to remediation or support areas (if known) have a high potential to contain potentially significant cultural resources, those resources and areas will be subject to further investigation and evaluation on an RU-specific basis. Specifically, during the remedial design process, GE will submit, for each RU, a Work Plan for a Phase IB Cultural Resource Survey. Using information in the Supplemental Phase IA CRA Report and design information in the Conceptual Remedial Design/Remedial Action Work Plan for the subject RU, that work plan will propose additional activities, including field investigations, to determine whether the remediation and support activities for that RU, as designed, will impact any potentially significant cultural resources. The proposed investigations may include visual reconnaissance, terrestrial surveys, underwater investigations, and architectural surveys, as appropriate. That work plan and the subsequent steps in the CRA process for the RUs are described in Section 4.3.3.2 of the approved Final Revised SOW.

5 References

- Anchor QEA, AECOM, and Arcadis, 2021. *Final Revised Rest of River Statement of Work*. Prepared for the General Electric Company, Pittsfield, Massachusetts. September 2021.
- Arcadis and AECOM, 2021. *Pre-Design Investigation Work Plan for Upland Disposal Facility*. Prepared for the General Electric Company, Pittsfield, Massachusetts. November 2021.
- EPA 1989. Office of Emergency and Remedial Response, *Compliance with Other Laws Manual Part II: Clean Air Act and Other Environmental Statutes and State Requirements. Interim Final. Section 4.1*.
- Glover, Suzanne, Paul Russo, Amy McFeeters, and Maureen Cavanaugh, 1994. *Phase IA Cultural Resources Survey for the Relicensing of Eight Hydroelectric Developments Along the Deerfield River Valley in Vermont and Massachusetts*. The Public Archaeology Laboratory, Inc., Pawtucket, Rhode Island. Submitted to New England Power Company, Westborough, Massachusetts.
- URS. 2008. *Initial Phase IA Cultural Resources Assessment for the Housatonic River – Rest of River Project*. Prepared for General Electric Company, Pittsfield, Massachusetts. March 20, 2008; Public Release Version submitted on April 3, 2008.