



GE
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Pittsfield, MA 01201
USA

March 5, 2009

Ms. Susan Svirsky
U.S. Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

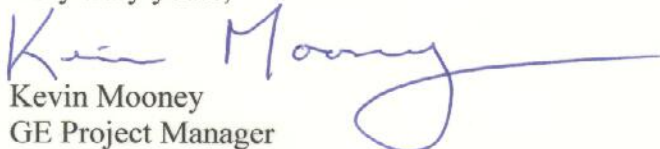
**Re: GE-Pittsfield/Housatonic River Site
Rest of River (GECD850)
Response to EPA's Comments on the Phase 1 Cultural Resources Assessment –
Public Release Version**

Dear Ms. Svirsky:

Please find enclosed GE's response to EPA's comments, dated September 9, 2008, on "*Initial Phase 1A Cultural Resources Assessment for the Housatonic River – Rest of River Project.*" GE's response was prepared for GE by URS Corporation.

GE's response is marked "Public Release Version" because the locations of known prehistoric and historic sites have been removed from this version of GE's response. This information was obtained from the State of Massachusetts and is not for public release in order to protect the integrity of these sites.

Very truly yours,


Kevin Mooney
GE Project Manager

Enclosure

cc: Brona Simon, MA HC
Victor Mastone, MA BUR*
Dale Young, MA EOEEA*
Kathleen Atwood, USACE
Kathleen Knowles, MPTHPO*
Bettina Washington, WTHPO*
Sherry White, MTHPO*
Dean Tagliaferro, EPA*

Timothy Conway, EPA*
Holly Inglis, EPA*
Rose Howell, EPA*
Michael Gorski, MDEP*
Susan Steenstrup, MDEP*
Eva Tor, MDEP*
Jane Rothchild, MDEP*
Susan Peterson, CTDEP*
Scott Campbell, Weston Solutions*
Linda Palmieri, Weston Solutions*
Michael Carroll, GE*
Roderic McLaren, GE*
Andrew Silfer, GE*
James Bieke, Goodwin Procter*
Daniel Cassedy, URS*
Public Information Repositories

* Cover letter only

PUBLIC RELEASE VERSION**General Electric's Responses to EPA's Comments on
Initial Phase 1A Cultural Resources Assessment for Rest of River**

In March 2008, the General Electric Company (GE) submitted to the United States Environmental Protection Agency (EPA) a report entitled *Initial Phase 1A Cultural Resources Assessment for the Housatonic River – Rest of River Project* (CRA Report), prepared for GE by URS Corporation. This report was submitted in conjunction with GE's Corrective Measures Study (CMS) Report on the Rest of River. This 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 (if any) have been determined.

On September 9, 2008, EPA issued a set of comments on GE's CMS Report. Included within those comments, as Specific Comments 131 through 137, were comments on GE's Initial Phase IA CRA Report. URS has prepared this document on GE's behalf to respond to those EPA comments. This document lists each EPA comment on the CRA Report, followed by a response. Following EPA approval of the CRA Report, as modified by these responses, a full revised CRA Report will be submitted to EPA for the record.

Specific Comment 131. *Page 14: EPA notes that the separation of the information on Cultural Contexts between this section and Appendix B is unnecessarily confusing to the reviewer and recommends that subsequent reports of this type include all such information in a single section.*

Response: GE will combine the Cultural Contexts information into one section in subsequent reports.

Specific Comment 132. *Page 14: The majority of the reports used in the writing of this section are over 10 years old, with many seeming to have been written for eastern New York, with some speculative applicability to western Massachusetts. GE shall confirm that this section was developed specifically for this CRA and includes reference to all known applicable studies, and if not, revise the section to reflect the more current and/or applicable information.*

Response: The cultural contexts presented in Section 3 were prepared specifically for this CRA. As is standard practice in the preparation of cultural resource management reports, the text draws upon previous research conducted by the consultants and by other researchers in the region and synthesizes these sources into a project-specific presentation. The sources used were appropriate for the project and reflect the reality concerning the timing and location of regional archaeology

projects in western Massachusetts, northwestern Connecticut, and eastern New York. In the late 1980s and the early 1990s, there was a surge of archaeological research projects associated with highway and gas pipeline projects in the Housatonic region, but there have been a more limited number of relevant projects in the past 15 years. In addition, archaeologists working in the region have consistently documented the close cultural ties between the Housatonic Valley and the Hudson and Connecticut Valleys to the west and east, making reports prepared for these regions relevant for filling in gaps in the prehistoric and contact period contexts for the Housatonic region.

This strategy for development of cultural contexts is the same one used by the Public Archaeology Laboratory (PAL) in its 2006 report, which was recommended by the EPA as having useful cultural contexts relevant to the current CRA (see Specific Comment 133 below). The PAL cultural contexts are similar to the URS contexts in regional focus and in the chronology of their references, as shown in Tables 1 and 2 below. Thirty two of PAL’s 33 bibliographic references for their prehistoric context section are over 10 years old (3 from the 1990s, 17 from the 1980s, 9 from the 1970s, 1 from the 1960s, and two from the 19th century), and they have a similar geographic distribution to those used for the URS CRA report. Regionally, 11 of the PAL references deal specifically with the Housatonic Valley, 5 are from the Hudson Valley and Connecticut Valley, and the other 17 deal with eastern Mass, RI, and New England and New York in general. Both the PAL report and the CRA Report accurately reflect the regional knowledge base concerning the prehistory of the region and are comparable to other reports prepared in the same time frame.

Table 1. Chronological Distribution of References Cited for Prehistoric Context Sections of the URS 2008 CRA report and the PAL 2006 Housatonic Archaeological Survey Report.

Date of Publication	URS		PAL	
2000-2008	3	6%	1	3%
1990-1999	11	23%	3	9%
1980-1989	17	35%	17	52%
1970-1979	13	27%	9	27%
pre 1970	4	8%	3	9%
	48	100%	33	100%

Table 2. Regional Distribution of References Cited for Prehistoric Context Sections of the URS 2008 CRA report and the PAL 2006 Housatonic Archaeological Survey Report.

Region	URS		PAL	
Housatonic	18	38%	11	33%
Connecticut Valley	6	13%	3	9%
Hudson Valley	6	13%	2	6%
Eastern Mass	2	4%	7	21%
Northeast/New England	13	27%	9	27%
East	3	6%	1	3%
	48	100%	33	100%

Specific Comment 133. *Page 14: The most recent survey of the Housatonic River, by PAL in 2005, is not included in the section summarizing previous research in the region. Although PAL (2005) did not locate any sites, they did prepare pre-contact, contact, and post-contact contexts which could have proven useful in the writing of this chapter. GE shall include a brief review and summarization of this research study.*

Response: As noted in the prior response, the cultural contexts presented in the PAL report are similar to those presented in the CRA Report, both in the chronology of their references and in regional focus. GE will add the following summary to Section 3.1 of the CRA Report.

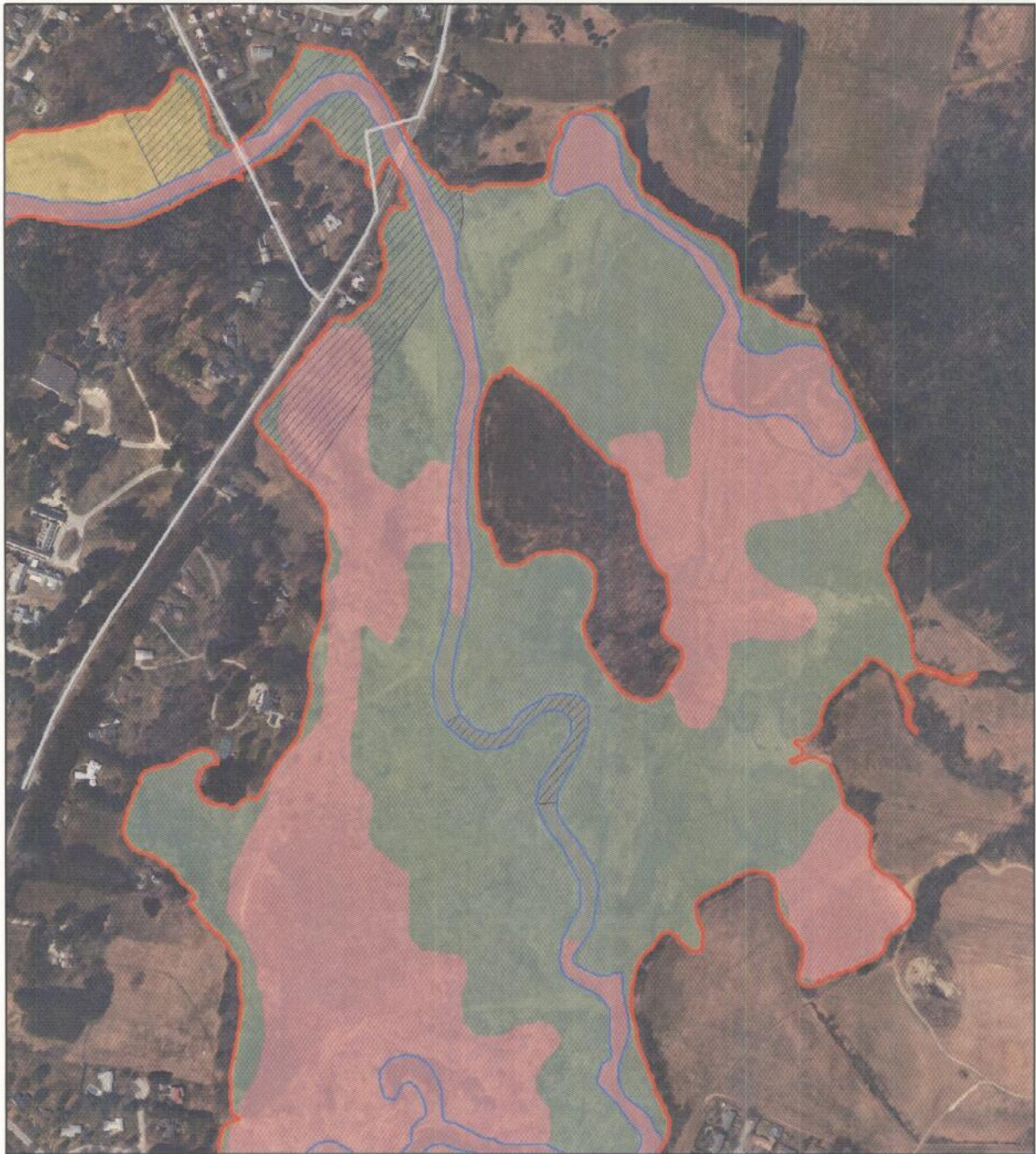
“The Public Archaeology Laboratory (PAL) conducted an intensive archaeological survey of a portion of the Housatonic River in Pittsfield in 2005 in connection with EPA’s performance of remediation in the portion of the river known as the 1½ Mile Reach. A report on that survey was submitted to the U.S. 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-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.”

Specific Comment 134. *Page 20: EPA notes that Section 3.9 would more properly be titled “European Settlement . . .” because simply retitling it “Settlement . . .” implies that the area was not settled prior to the arrival of Europeans.*







Response: GE will modify the title of Section 3.9 as suggested.

Specific Comment 135. *Page 56: Reference is made to two rock mounds in the river that could possibly be the remnants of a prehistoric fish weir. On the Archaeological Sensitivity maps, there is a notation for historic sensitivity for submerged resources. However, all figures show the river and millponds as having low sensitivity for prehistoric sites without indication of these two features. GE shall include a clarification and submit revised Archaeological Sensitivity map(s) as necessary.*

Response: GE will modify Figure 8 (Archaeological Sensitivity Map, Sheet B) to reflect high potential for prehistoric archaeological remains in the river channel in the area of the rock mounds (pending further study). A copy of the modified figure is attached. Currently, sufficient information is not available to identify other areas of prehistoric sensitivity in other sections of the river channel and millponds. Additional visual inspection and closer analysis of the river bed topography will be incorporated into future research plans to determine if there are other river channel sections that might have been suitable for weir construction.



Historic Sensitivity

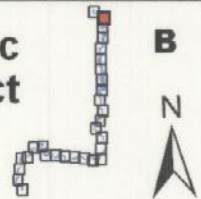
-  Submerged
-  Terrestrial
-  Known Historic Sites
-  1876 Roads
-  1876 Railroads
-  1876 Dams and Mill Races

Prehistoric Archaeological Potential

-  High
-  Medium
-  Low
-  APE

GE Housatonic River Project

0 260 520 780 1,040 Feet



Specific Comment 136. *Pages 73 through 80: Some of the references used in Appendix B are missing from the References section. EPA believes the missing references to be: Cassedy 1992, Kaeser 2006, Luedtke 1987, Moeller 1980, Nadeau and Bellantoni 2004, Strauss 1992, Tryon and Philpotts 1997, however GE should review the CRA thoroughly to ensure that list is complete. GE shall include revised CRA References that includes a complete listing of all references cited in the Phase 1 CRA.*

Response: GE will revise Section 7 to include all references cited in the text.

Specific Comment 137. *Page 81: EPA notes that the individuals listed in Appendix A carry the title of Tribal Historic Preservation Officer (THPO), and that line should be added to each of the addresses. Also, Ms. Bettina Washington is the Acting THPO for the Wampanoag Tribe of Gay Head (Aquinnah); Ms. Andrews-Maltais is now the chairperson of the tribe. Any correspondence should be sent to Ms. Washington.*

Response: GE will add the appropriate title to each individual listed and will update the name of the Wampanoag THPO.