



United States Department of the Interior

NATIONAL PARK SERVICE
New Bedford Whaling National Historical Park
33 William Street
New Bedford, Massachusetts 02740

Superfund Records Center
New Bedford
SITE: 1G.1
OFFER: 498995

IN REPLY REFER TO :

A00(NPS/NEBE)

February 28, 2011

Elaine Stanley
Project Manager, New Bedford Harbor Superfund Project
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
OSRR07-4
Boston, MA 02109-3912

Re: Consulting Party request

Ms. Stanley:

The National Park Service has great interest in the recent archaeological finds in New Bedford Harbor as a result of the EPA's dredging work. Although the harbor is just outside of the boundaries of New Bedford Whaling National Historical Park, the ship remains that have turned up and potential underwater Native American sites that have been identified are directly relevant to the themes of the park and its mission to preserve and interpret our history. For this reason, we request participatory status as a Consulting Party under Section 106 of the National Historic Preservation Act.

In the past ten years underwater survey technology, methods and analysis have greatly improved, and artifacts are now surfacing that were not identified in the original survey work done for this project. Thus, we also request that before further dredging work commences later this spring, additional survey work be performed to ensure to the greatest extent possible that other potential artifacts are identified before they are dredged. We would like to have the chance to review the scope and specifications of such survey work before contracts are solicited. If needed, we can help in the development of these. Once the work is performed, we also request the option of examining the raw data ourselves rather than just receiving the final report.

We regret that we were not informed earlier of the 1700's shipwreck that was discovered, as this was an item of great interest to us and we would perhaps have suggested different excavation and storage methods for the artifacts. Should potential artifacts be identified through additional survey work, we wish to remain in discussion on methods of study and/or excavation. We note that the Massachusetts Board of Underwater Archeological Resources has recommended, due to the probability of additional artifacts being found, that an unanticipated finds procedure be



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developed in advance of further work. We support this recommendation and would like to review this once it is complete. Should any unanticipated finds be encountered in the field, we would like to be notified immediately.

We also request once again a copy of the 2002 archaeological survey report that was done. Despite it having been sent to our office at that time, we cannot locate a copy of it and your cooperation would be of great assistance to our understanding of the project. If possible, we would also be interested in receiving the raw data generated by this survey. I understand there were questions raised about the confidentiality of the information; I trust that our being a Consulting Party in addition to a fellow federal agency will help alleviate those concerns.

When we last met, you said that you would have the ship timbers that were excavated tested for PCB contamination, as local entities may be interested in some pieces for exhibition. We are still interested in the results of those tests; please notify us when they are available.

Finally, we wish to ensure that our local tribes remain involved in the project. In our last meeting we came away with the impression that although tribal consultation in regards to this project had taken place in the past, that it was neither current nor ongoing. Our relationship with the tribes is very important to our park; and though we are different agencies, we are one federal government and the actions of one of us affect the tribes' relationship with us all. Due to the probable existence of underwater sites with Native American significance within the project area, and particularly given the discovery of previously undetected artifacts, we encourage you to remain in close dialogue with the tribes as the project continues.

In closing, we fully support your efforts to clean up the hazardous contamination in New Bedford Harbor, a project that will yield great benefits for us all. We are sensitive to the fact that your agency's mission is environmental protection, and that the consideration of cultural resource preservation can often seem like an obstacle when that is not your primary focus or objective. As an agency that does have preservation as part of its core mission and can bring experience and expertise to bear in regards to its approach, we think we can accomplish both environmental protection and historical preservation together in a timely and efficient way in this project, yielding even greater benefits for the American public. The National Park Service stands ready to work with you to help make that possible.

Thank you for your consideration of our requests. We look forward to your response, and to working with you on this project into the future.

Sincerely,



Jennifer T. Nersesian
Superintendent

cc:

Marc Paiva, U.S Army Corps of Engineers

Victor T. Mastone, Massachusetts Board of Underwater Archaeological Resources

Brona Simon, Massachusetts Historical Commission

Mayor Scott Lang, City of New Bedford

James Russell, New Bedford Whaling Museum

Bettina Washington, Aquinnah Wampanoag Tribe

George Green Jr., Mashpee Wampanoag Tribe

Kimberly White, EPA Regional Project Manager



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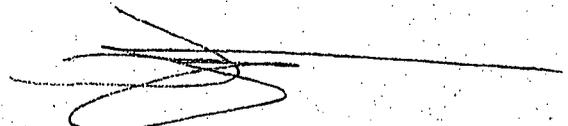
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