



Superfund Records Center  
SITE: New Bedford  
BREAK: 4.9  
OTHER: 523828

**The Commonwealth of Massachusetts**

November 18, 2010 William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

Lois K. Adams  
Chief, Grants, Tribal and Municipal Assistance Branch  
Office of Ecosystem Protection  
US Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

RE: New Bedford Harbor State Enhanced Remedy in New Bedford South Terminal, a/k/a Confined Disposal Facility a/k/a South Terminal Marine Industrial Park Development, New Bedford, MA: MHC #RC.48896.

Dear Ms. Adams:

Staff of the Massachusetts Historical Commission (MHC), office of the State Historic Preservation Officer have reviewed the results of the archaeological investigations for the subtidal and intertidal portions of the project, described in two reports, *Assessment of Prehistoric Archeological Site Potential: Subtidal Portions of the Proposed South Terminal Marine Infrastructure Park, New Bedford, Massachusetts*, and *Assessment of Archeological Site Potential: Intertidal Portions of the Proposed South Terminal Marine Infrastructure Park, New Bedford, Massachusetts*, prepared by John Milner Associates, Inc. (JMA), and received by the MHC on November 4, 2010.

Subtidal Zone: The investigations identified an area with intact paleosols in the southern portion of the survey area (see Figure 10). The single radiocarbon assay of  $2660 \pm 40$  BP, when calibrated, indicates that the age of the sample tested most likely dates between 2,740 and 2,850 years ago (900 to 790 BC). The JMA researchers interpret the results as indicating that the project area includes a well-preserved and intact ancient upland landform that was available for Native American land use and occupation. This is a significant discovery that provides information on the location and character of land available to resident Native Americans during the Early Woodland period prior to sea level rise and submergence in the Acushnet River and Buzzards Bay drainage basin. The Early Woodland Period in Southern New England is a research area of considerable interest. The limited investigations of a single vibracore were not designed to identify artifacts or cultural features, but if present, information about ancient Native American use of the location could provide important information.

MHC requests that project planners consider alternatives that would avoid and protect the landform, and present the results of the alternatives analysis to the consulting parties.

If redesigning the project to avoid impacting and to protect the landform is not feasible, then MHC requests that a research design and methodology be developed to conduct an archaeological site examination of the landform. The goal of the site examination is to determine if the landform contains significant historic resources, and to describe the historic, scientific, and cultural qualities and characteristics, including the locations, sizes, boundaries, data contents, and spatial arrangements of artifacts and features. The purposes of the archaeological site examination is to provide sufficient technical information to offer an opinion of National Register-eligibility (36 CFR Part 60), and to develop a program in consultation with the consulting parties that would sufficiently mitigate any adverse

220 Morrissey Boulevard, Boston, Massachusetts 02125  
(617) 727-8470 - Fax: (617) 727-5128  
[www.sec.state.ma.us/mhc](http://www.sec.state.ma.us/mhc)



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effects to historic properties. The proposed site examination research design and methodology should be provided to the interested consulting parties for their review and comment.

Intertidal Zone: The investigations identified one area with intact paleosols in the southern portion of the survey area, approximately 100 feet from the landform found in the subtidal zone (see Figure 4). A radiocarbon assay from this area may not accurately date the intact landform, because the location sampled at the edge of the landform is interpreted by JMA to have a redeposited layer. The layer from which the radiocarbon dating sample was taken is above a layer that included historical period material (iron slag). Additional radiocarbon dating of samples from other areas of the landform could accurately date it. The landform has a high potential to contain ancient period Native American artifacts and cultural features. The report indicates that the landform is not within an impact area for the project. Project planners should develop a plan to avoid and protect the landform from inadvertent impacts during the construction of the project, and provide the plan to the consulting parties for comment.

These comments are offered to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (36 CFR 800). Please contact Edward L. Bell of my staff if you have any questions.

Sincerely,



Brona Simon  
State Historic Preservation Officer  
Executive Director  
State Archaeologist  
Massachusetts Historical Commission

xc:

New Bedford Harbor Development Commission  
Karen Kirk Adams, USACOE-NED-Regulatory  
Kathleen Atwood, USACOE-NED  
Victor T. Mastone, Massachusetts Board of Underwater Archaeological Resources  
George Green, Jr., Mashpee Wampanoag Tribe  
Bettina Washington, Wampanoag Tribe of Gay Head (Aquinnah)  
Jennifer T. Nersesian, NPS New Bedford Whaling NHP  
Derek J. Santos, New Bedford Historical Commission  
Chet Meyers, APEX Companies, LLC  
J. Lee Cox, Jr., Dolan Research Inc.  
Joel I. Klein, John Milner Associates, Inc.  
William Chadwick, John Milner Associates, Inc.  
Martin G. Dudek, John Milner Associates, Inc.