



Purvi Patel, Environmental Analyst  
MEPA Office  
Project EEA# 16301  
100 Cambridge St., Suite 900  
Boston, MA 02114

January 4<sup>th</sup>, 2020

Dear Purvi Patel,

Thank you for the opportunity to comment about the 8,000-10,000 year old Native American Historic Site discovered in the path of the Northampton roundabout project in this public comment period (EEA# 16301).

I am the general manager of River Valley Co-op, a community owned retail grocery cooperative, which is located near the proposed roundabout at 330 North King Street in Northampton. We are cooperatively owned by over 11,000 people in the area and are open to the public.

We have objected to this project as proposed, due to the devastating economic impact it is projected to have on our business for the duration of the project and multiple years following, long before we were aware of the amazing archeological discovery. We had asked repeatedly for a less intrusive solution and if that is not possible, for overnight construction to help mitigate the economic impact. Our neighboring locally owned businesses have also objected to this project long before the discovery of the historic site. Overnight construction would help mitigate the severity of the economic impact for all of us.

However, when the historic site was discovered, it was painfully clear that overnight construction would create as much destruction to this historic site as daytime construction. We could not continue to call for overnight construction to mitigate damages to our business, when it would result in destruction of this historic site that predates the building of the pyramids in Egypt by thousands of years.

We anticipated that the overall construction plans would be required to be changed by the state to preserve the site. It has been a learning experience to observe how the state has pushed to proceed with construction while having full knowledge that this important archeological site would be destroyed in the process.

We are calling on MEPA to require a full Environmental Impact Report to address the archeological resources that would be destroyed by the proposed roundabout. We understand some artifacts have been removed, however only a small segment of the site was excavated and the study concluded that the site should be left undisturbed because additional hearths and artifacts likely on the site remained in the path of the proposed construction.

Removal of artifacts is not the same as preservation of a historic cultural site. This site was likely to have been lived on seasonally over thousands of years as people returned to hunt migrating caribou 8,000-10,000 years ago. Ancient burials are likely resting below the depth of the limited archeological study areas as well as many other ancient artifacts in the remaining 70-80% of the site which was not excavated in the state study.

The state archeological report concluded that the site was a very rare habitation site, eligible on two separate criteria for inclusion on the National Registry of Historic Places.

Many community members, as well as River Valley Co-op and myself, have called for historic preservation through a petition signed by over 55,000 people. In spite of this petition, no public hearings have been held at the local or state level to address historic preservation possibilities or alternative plans for the intersection.

River Valley Co-op has consulting party status in the Federal Highway Administration chapter 106 review process as an abutter impacted by the proposed project. This has given us the opportunity to ask questions and review documents related to the archeological study and state process.

We were informed at the end of October by the FHA that the Massachusetts Historical Commission had signaled they approved proceeding to the start of construction. We understand that the federally recognized Tribes involved (the Aquinnah Wampanoag and the Narragansett) in the federal 106 review process object to the construction proceeding as planned because it will result in the total destruction of this archeological site. We understand that this site is of great historical and cultural importance to them.

The objections of the Aquinnah Wampanoag and Narragansett were omitted from the MassDOT filing and we are asking MEPA for a full review of the importance of this historic sites preservation to these and other Native American groups.

River Valley Co-op also objects to construction proceeding as proposed because it will destroy the historical site.

We are calling on MEPA to require the MassDOT to complete an Environmental Impact Report to address the significance of the archeological resources of this site and for MEPA to require the report to include options for full preservation of this ancient archeological site as called for in the state's study, multiple Native American groups, and over 55,000 petition signers.

We are also calling on MEPA to require MassDOT include a complete account of all steps taken in their processes and procedures and for MEPA review to ensure full compliance with all the requirements related to Native American archeological discoveries in federally funded projects. Some of the compliance issues we'd like MEPA to specifically look into include:

1. The MassDOT failure to file an Environmental Notification Form for the historical and archeological resources that were discovered at the site before taking Agency Action on the historical site. The MassDOT MEPA filing claimed it had an exemption from filing the ENF with MEPA at that time. However, they did not report that the Aquinnah Wampanoag and Narragansett did not sign off on the MOA for the state's archeological services contract or agree to its scope. Due to the absence of this required consultation with the federally recognized tribes, the MassDOT ENF exemption claim may not be valid.
2. The MassDOT MEPA filing did not include that it authorized and engaged in the destruction of the archeological site and a historic stone wall with heavy equipment in November of 2019. The destruction was interrupted by the current landowner at that time with support from police, but damage was done to the historic site and historic stone wall. This raises questions of a 110 K violation investigation.
3. A MEPA review of the MassDOT construction timeline for July of 2020 may demonstrate it had plans to move forward taking steps to proceed with some site work prior to full compliance

with the required consultation and review process with the Aquinnah Wampanoag Cultural Resources official contracted to monitor the project as well as with other federally recognized Tribes including the Narragansett.

4. A review of the procedures and processes in the removal of the artifacts including the chain of custody and locations of the artifacts and future plans for their preservation/custody. There may have been a violation with the removal of the artifacts beyond state lines as well as removal of the artifacts prior to state ownership of the site.

We have learned through this project review process that our state's record compared to surrounding states related to the number of Native American sites listed on the National Registry of Historic Places is appallingly low. I'm asking you to reflect on the over 300:1 ratio of Massachusetts colonial sites to Native American sites on the NRHP. These statistics suggest a longstanding systemic bias and injustices in how the Massachusetts historical preservation processes operate. This has resulted in the systematic cultural erasure of Native American history in our state over the course of history from colonial occupation to the current time in Massachusetts.

We are asking MEPA to help put an end to this pattern of Native American cultural erasure by our state with a full Environmental Impact Report on the archeological resources of this site as well as a review of how the state addressed the discovery of this Native American historical site. We expect MEPA will find the state demonstrated a predisposition against the preservation of the site. This predisposition resulted in MassDOT taking steps to minimize the scope of the archeological study, minimize the conclusions of the study, and base decisions to attempt to move forward with destruction of the site driven primarily by the availability of grant funding for this construction project. It is not even a high priority highway project, yet the public value of historic preservation does not appear to have been given consideration except as an obstacle to overcome.

We expect MEPA to find it is a priority to honor the importance of the archeological discovery with its preservation and to require alternative plans and funding as needed for any desired roadway improvements.

As a neighbor to this site, we consider the value of preserving the historic site a community, state and public priority.

Thank you for the opportunity to comment during this public comment period.

Sincerely,



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