

SUPPLEMENTAL CULTURAL RESOURCES MANAGEMENT PLAN
Champlain Hudson Power Express HVDC Transmission Line Project
Whitehall to Fort Ann, CP Rail (Segment 3, Package 1C)

[REDACTED-Public Version]

Lake Champlain to New York City
Washington County, New York

HAA 4268-83
SHPO 09PR03910

Submitted to:

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MANAGEMENT SUMMARY

SHPO Number: 09PR03910
Involved Agencies: U.S. Department of Energy, U.S. Army Corps of Engineers, NYSHPO
Phase of survey: Supplemental Cultural Resources Management Plan

LOCATION INFORMATION

Municipality: Towns of Whitehall and Fort Ann, Village of Whitehall
County: Washington County

CULTURAL RESOURCE MANAGEMENT PLAN OVERVIEW

Objective: *The purpose of this Supplemental Cultural Resources Management Plan is to synthesize data sets into one document, and to provide OPRHP/DPS contact information for identified roles within the Cultural Resource Management Plan drafted by TRC in 2015 and finalized in 2021.*
The plan also proposes Programmatic Allowances and an Archeological Monitoring Plan to assist with ongoing review and compliance as stipulated in the Programmatic Agreement between DOE and NYSHPO in 2021.
The current CRMP focuses on Segment 3, Package 1C along the CP Rail ROW from the Village Whitehall to the Town of Fort Ann.

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Date of Report: March 2023

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LIST OF ACRONYMS

ACHP – Advisory Council on Historic Preservation
AMP – Archeological Monitoring Plan
APE – Area of Potential Effect
BMP – Best Practices Management Plan (2012)
CA – Consulting Archeologist
CHPE, LLC – Champlain Hudson Power Express, LLC
CRMP – Cultural Resources Management Plan
CRIS – Cultural Resource Inventory System (NYSHPO)
DOE – U.S. Department of Energy
GIS – Geographic Information System
GPS – Global Positioning System
Hartgen – Hartgen Archeological Associates, Inc.
HDD- horizontal directional drilling
HVAC – high-voltage alternating current
HVDC – high-voltage direct current
LOW –Limits of Work
MOA – Memorandum of Agreement
MP – mile post, railroad
MW – megawatt
NHPA – National Historic Preservation Act
NRE – National Register-eligible
NYAC – New York Archaeological Council
NYSHPO – New York State Historic Preservation Officer
NYSM – New York State Museum
OPRHP – Office of Parks, Recreation and Historic Preservation
PPO – Project Preservation Officer
ROW – Right-of-Way
TRC – TRC Companies, Inc

CULTURAL RESOURCES MANAGEMENT PLAN

1 Introduction

Hartgen Archeological Associates, Inc. (Hartgen) has been retained to create a supplemental Cultural Resources Management Plan (CRMP) for the proposed Champlain Hudson Power Express (Project) located over multiple counties through New York. The current phase of work focuses on the overland portion along CP Rail in Washington County, between the Village of Whitehall and the Town of Fort Ann.

The Project has received approvals by the U.S. Department of Energy (DOE) and the U.S. Army Corps of Engineers, with consultation from the NYSHPO. The goal of the CRMP is to provide a framework for managing potential impacts to all relevant historical properties and archeological sites (determined to be eligible for or listed in the National Register of Historic Places) known to exist, or which may be discovered. This management plan will also create a comprehensive framework for identifying and undertaking any additional archeological work that may be required prior to and during the construction of the Project.

TRC Companies, Inc. (TRC) created a draft comprehensive CRMP in 2015, finalized in 2021 to include three additional reports. This management plan is referred to throughout the current document (Appendix 1)(TRC 2021), with this document serving to fully incorporate all the relevant information for Phase I of construction into one succinct document. In the event of a conflict between this document and that provided in Appendix 1, the CRMP (2021) will prevail.

This plan was enacted to comply with Section 106 of the National Historical Preservation Act and will be reviewed by the New York State Office of Parks, Recreation and Historic Preservation (OPRHP), as well as the aforementioned federal agencies. This plan was established according to the New York Archaeological Council's *Standards for Cultural Resource Investigations and the Curation of Archaeological Collections* (1994), which are endorsed by OPRHP.

The Programmatic Agreement Among The U.S. Department of Energy, And The New York State Historic Preservation Officer For Managing Historic Properties That May Be Affected By Authorizing The Construction, Operation, Connection And Maintenance Of The Champlain Hudson Power Express HVDC Transmission Line Project (Programmatic Agreement), executed in 2021, stipulates completion of a Cultural Resources Management Plan (CRMP) to create procedures for the consideration and management of historic properties within the Champlain Hudson Power Express HVDC Transmission Line Project (Project).

Stipulation IV(B) within the Programmatic Agreement specifies the CRMP will be applied in lieu of Section 106 implementing regulations 36 CFR Part 800.4 – 800.6 to satisfy requirements of compliance with Section 106 of the National Historical Preservation Act (16 U.S.C. 470) related to identification of historic properties (36 CFR Part 800 800.4), assessment of adverse effects (36 CFR Part 800 800.5), and resolution of adverse effects (36 CFR Part 800.6).

This Supplemental CRMP has been developed in response to Programmatic Agreement Stipulation IV(B) and Stipulation II(C)(8 – 11 and 19). In 2015, TRC completed the *Champlain Hudson Power Express HVDC Transmission Line Project Cultural Resources Management Plan* which was revised in 2021. This document provides detailed procedures for unanticipated discoveries, monitoring during construction-related ground disturbance, and monitoring during post-construction operations; all stipulations of the CRMP (2021) remain applicable.

Current design and engineering requirements indicate effects to historic and landscape resources may also require consideration throughout project execution; this Supplemental CRMP supports streamlined coordination and consultation with NYSHPO through agreement on programmatic allowances and treatments. This Supplemental CRMP provides structure and process for implementing requirements of the Programmatic Agreement and the CRMP (2021).

2 Supplemental CRMP Objectives

For each component of the segment (splice locations and vaults, HDD, work areas, access roads, etc.) were evaluated to determine whether the proposed work lies within the permitted route (APE) or outside the permitted route. Areas outside the permitted route were further evaluated to determine whether the areas have been previously disturbed (lacking archeological potential) or undisturbed (having archeological potential). Recommendations are proposed for either archeological monitoring during construction in the manner described in Section 5, or for archeological testing.

Archeological testing may be utilized in advance of construction. Testing would be conducted by the excavation of 40-centimeter tests placed at 50-foot intervals within the areas defined below. Excavated soil would be passed through 0.25-inch hardware mesh when feasible and examined for both precontact (Native American) and historic artifacts. The stratigraphy of each test would be recorded including the depth, soil description, and artifact content. The location of each shovel test would be plotted on the project map.

The testing shall adhere to the New York Archaeological Council's *Standards for Cultural Resource Investigations and the Curation of Archaeological Collections* (1994), which are endorsed by OPRHP. The investigation shall be overseen by an Archeologist as defined under the Secretary of the Interior's Professional Qualification Standards outlined in *Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines as Amended and Annotated*, and as required under Title 36 of the Code of Federal Regulations, Section 61 (36 CFR 61).

The survey report(s) shall be prepared according to OPRHP's *State Historic Preservation Office (SHPO) Phase I Archaeological Report Format Requirements* (2005) or another format acceptable to OPRHP. As appropriate, reports will contain text, tables, color maps and photographs, shovel test records, and an artifact inventory.

3 Project Information

The Project involves the construction of approximately 339 miles of a high voltage direct current underground and underwater transmission line, running from Montréal, Canada to Queens, New York. This transmission line will bring 1,250 megawatts of hydropower to replace the use of fossil fuels, reducing carbon emissions and helping achieve renewable and clean energy in New York State. This proposed project will provide enough power for more than 1 million homes in New York State. Installation of this transmission line will occur primarily beneath the ground within roadway and railroad right of way. Direct impacts to streams and waterbodies are avoided through means such as attaching to existing infrastructures (bridges and culverts) or incorporating the use of horizontal directional drilling (HDD).

Several archeological reports by Hartgen and TRC examined and detailed the sensitivity and potential of the APE. These resources have been utilized in the creation of the Supplemental Cultural Resource Management Plan (SCRMP).

The bolded reports include portions of the most current Project (Segment 3) and provide relevant background information.

- Hartgen. 2010a. Pre-Phase IA Archaeological Screening: Champlain Hudson Power Express.
- **Hartgen. 2010b. Phase IA Literature review and archaeological sensitivity assessment: Champlain-Hudson Power Express.**
- **Hartgen. 2012. Phase IB Archaeological Field Reconnaissance and Phase II Archaeological Site Evaluation: Champlain Hudson Power Express, Canadian Pacific Railway Segment.**
- Hartgen. 2013a. GIS Analysis: Archeological Sites within APE Archeological Sites Intersected by a 50-ft wide Construction Corridor Along the November 2012 CHPE/TDI Centerline.
- Hartgen. 2013b. GIS Analysis NRHP Properties within APE National Register of Historic Place Eligible (NRE) and Listed (NRL) Properties Intersected by a 50-ft wide Construction Corridor along the November 2012 CHPE/TDI Centerline.

- Hartgen. 2013c. GIS Analysis Underwater Resources within APE Underwater Anomalies and Sites within Lake Champlain and the Hudson River Intersected by a 50-ft wide Construction Corridor along the November 2012 CHPE/TDI Centerline.
- TRC. 2020a. Phase IA Archeological Assessment of Champlain-Hudson Alternative Routes, New York.
- TRC. 2020b. Phase IA Archeological Assessment of Champlain Hudson Astoria Converter Station and Astoria Preferred Alternative Route, Boroughs of Queens, New York.
- TRC. 2020c. Phase IA Archeological Assessment of Champlain-Hudson Power Express Project, Harlem Rail Yard Preferred Alternative, Boroughs of Queens, New York.
- TRC. 2021. Phase IA Archaeological Assessment of the Champlain-Hudson New Scotland Converter Station, New Scotland, Albany County, New York.
- TRC. 2022. Phase IA Archaeological Survey letter for the Stony Point Horizontal Directional Drill (HDD), Stony Point, Rockland County, New York.

3.1 Description of the Project

The area of potential effects (APE) includes portions of the Project that will be directly altered by the proposed undertaking. The overall APE encompasses 339 linear miles; the width of the APE varies. For the overall cable route, the Project is divided into 14 Packages with their associated Environmental Management and Construction Plan (EM&CP) submittals (Table 1).

Changes in the APE, including those necessary to avoid known historic and archeological resources, may be required to accommodate project implementation. Changes to the APE will follow methodology outlined in the CRMP (2021). The CRMP states: *If the corridor is changed or if a construction zone wider than 55 feet (terrestrial) or 50 feet (in-water) is required to build the Project, then the APE will be adjusted accordingly. All additional efforts to identify, assess, and manage cultural resources shall use the same guidance as that stipulated in the CRMP. It shall be the responsibility of the PPO and his/her designee to work with the appropriately trained archaeologist to ensure that survey and assessment of new APE construction areas is completed before construction takes place* (TRC 2021). Changes in the APE and associated survey and reporting will be provided to Signatories of the Programmatic Agreement in conjunction with annual reporting requirements (Section 3.6 Reporting Requirements).

The area of potential effects (APE) includes all portions of the Project that will be directly altered by the proposed undertaking. The overall APE encompasses 339 linear miles.

Table 1. CHPE Packages, Segments, Locations and Dates.

EM&CP Segment	Design Packages	Location Description	Approximate Segment Length (miles)	Anticipated EM&CP Submittal	Anticipated Construction Commencement
OVERLAND SEGMENTS					
1, 2	Package 1A/1B	Putnam to Dresden/Dresden to Whitehall	17.82	April 15, 2022	November 2022
X	X	3 Laydown Yards	N/A	November 17, 2022	February 2023
3	Package 1C/ 2	Whitehall to Fort Ann/Fort Ann to Kingsbury	20.8	December 23, 2022	May 2023
8	Package 5A	Rotterdam to Selkirk	16.99	December 21, 2022	May 2023
9	Package 5B	Selkirk Bypass	5.31	December 21, 2022	May 2023
4, 5	Package 3	Kingsbury to Milton	26.5	March 2023	June 2023
10	Package 6	Ravena to Catskill	20.9	April 2023	June 2023
13, 14, 15	Package 8	Queens	2.13	April 2023	June 2023
6	Package 4A	Milton to Ballston	10.2	April 2023	July 2023
7	Package 4B	Ballston to Schenectady/Rotterdam	9.6	March 2023	July 2023
11	Package 7A	Catskill to Germantown	8.6	March 2023	July 2023
12	Package 7B	Stony Point to Haverstraw	7.6	April 2023	July 2023
Laydown Yards	3, 5B, 6	Fort Edward, Bethlehem, Coxsackie	N/A	November 11, 2022	February 2023
MARINE SEGMENTS					
16	Package 9	Transitional HDD (Stony Point)	N/A	September 29, 2022	July 2023
17	Package 10	3 Transitional HDDs (Putnam, Catskill, Clarkstown)	N/A	December 14, 2022	June 2023
18	Package 11	Lake Champlain	96	February 2023	June 2023
19	Package 12	Hudson River (Pre-Lay Mattressing)	89.1	March 2023	August 2023
20	Package 13	Hudson River (Cable Installation)	89.1	December 2023	June 2024
21	Package 14	Harlem River	6.3	December 2023	June 2024
22	TBD	Converter Station, Astoria Complex (Queens)	N/A	January 2023	June 2023
23	TBD	Astoria Rainey Cable HVAC System (Queens)	3.5	January 31, 2023	TBD

3.2 Segment 3, Package 1C Overview

This segment extends from the Village of Whitehall on the CP Rail ROW, using a combination of public roadways and the CP Rail ROW, to its terminus at the southern edge of the Town of Kingsbury. The construction activities in this segment include both open trench (typically the railroad ROW) and ductbank excavations (typically in roadway ROWs). The trenches will typically be 4.5 feet in depth and 2.4 feet in width at the base. The open trenches will be backfilled with sand around the conduit and flowable fill above. The duct bank excavations will be placed in concrete with flowable fill above and appropriate subbases, bases and asphalt pavement repair (Figure 1).

Disturbance beyond the typical trench cuts include the location of splices and boring/receiving pits for HDD installation (Tables 2 and 3). These are discussed in detail below relative to potential archeological resources and previous evaluation and assessment.

3.2.1 Splice Locations

Various splice locations will also be installed to connect the cable segments together into an integrated whole. The splice locations will generally be about 15 by 40 feet in size. In all, ten (10) splice locations will be required for the Package 1C portion of the Project (Splices 30A, 31 to 39). Archeological testing or monitoring is recommended for the work areas associated with Splices 38 and 39, as they occur within archeologically sensitive areas and are outside of the permitted route (Table 2).

Table 2. Splice Locations and Recommendations for Segment 3, Package 1C.

Description	Station Number	Activity	Notes/Recommendations
Splice 30A	15017+40	Within permitted route.	No archeological work.
Splice 31	15036+10	Splice and work area outside permitted route. Appears disturbed.	No archeological work.
Splice 32	15067+16	Within permitted route.	No archeological work.
Splice 33	15095+30	Within permitted route.	No archeological work.
Splice 34	15127+10	Within permitted route.	No archeological work.
Splice 35	15190+76	Within permitted route.	No archeological work.
Splice 36	15191+47	Splice within permitted route. Work area extends outside. Sloped.	No archeological work.
Splice 37	15213+78	Within permitted route.	No archeological work.
Splice 38	15246+21	Splice inside permitted route, work area extends outside.	Test or monitor work area.*
Splice 39	15277+46	Splice inside permitted route, work area extends outside.	Test or monitor work area.*

3.2.2 HDD

In all, seven (7) relatively short segments of HDD will be installed in the Package 1C portion of the Segment: HDD 3, 4, 4.A, and 5 to 8. At HDD locations 5, 6, and 7 the boring and receiving pits will be located just outside of the permitted route. However, these areas appear to be sloped, disturbed, and or wet, and are not considered archeologically sensitive. No further archeological work is recommended in these areas (Table 3).

Archeological monitoring is recommended during the drilling of the bore for HDD 7 to ensure that the Champlain Canal prism is not affected by the activity between Stations 15262+00 to 15269+50 in particular. The Consulting Archeologist should document the prism before, during, and after the activity to verify the resource was not impacted.

* The area may be shovel-tested by a qualified archeologist prior to construction or monitored by a qualified archeologist during construction, see Sections 2.2 and 6, respectively.

Table 3. HDD Locations and Recommendations for Segment 3, Package 1C.

HDD	Station Number	Location and Description	Notes/Recommendations
HDD 3	15064+00 to 15093+00	Cross RR siding and wet areas. Northern pit within permitted route, southern pit in previously disrobed railyard area.	No archeological work.
HDD 4	15139+00 to 15145+50	Drainage crossing. Both pits within permitted route.	No archeological work.
HDD 4.A	15163+00 to 15172+00	Crosses tracks from west to east side. Pits and work areas at both ends are within permitted route.	No archeological work.
HDD 5	15175+00 to 15183+00	Drainage crossing. Work areas partially outside of permitted route.	No archeological work.
HDD 6	15218+00 to 15233+00	Cross from east to west side of RR ROW and drainage crossing. Work areas partially outside of permitted route.	No archeological work.
HDD 7	15256+00 to 15269+50	Old Champlain Canal prism crossing, and nearby wet areas. Work areas partially outside of permitted route- wet and slope.	Archeological monitoring of HDD drilling activities.*
HDD 8	15295+50 to 15305	Cross from west to east side of tracks.	No archeological work.

3.2.3 Access Roads

This segment will also require temporary access roads to move equipment and workers from public roadways to the CP Rail ROW. The roads may be constructed in a variety of manners, including timber matting placed over the existing ground surface, or placing geotextile fabric on the ground surface with gravel or other stone material over top. These would require minimal, if any mechanical grading. Grading up to 16 inches may be necessary in some locations to remove the topsoil, which will be stockpiled and returned once construction activities end.

Two of the access roads require no additional archeological work as they will cross previously disturbed areas. The access road off Poultney Street in the Village of Whitehall is an existing, elevated roadway to a bridge over the CP rail tracks. The access road off Route 4 at Station 15289+00 crosses an existing stone yard and sorting facility. The area has been extensively disturbed. No additional archeological work is recommended for either of these Project components.

Four of the access roads (NY Route 4 to Stations 15069+00, 15165+00, 15240+00 and 15289+00) will cross over the old Champlain Canal prism, which is in various states of preservation from south of Whitehall to Fort Ann. The prism generally lies west of the CP Rail ROW and east of Route 4 (the prism does cross the ROW at HDD 7 near Stations 15262+000 to 15264+00, as discussed above).

The Route 4 Access Road at Station 15069+00 passes through an existing lumber yard. The access road will be sited just north of the old Champlain Canal prism as mapped on CRIS. This portion of the former canal appears to be filled and disturbed. Immediately along the railroad tracks there are wet areas and the slope of the rail grade/bed. No further work is recommended in this portion of the Project.

Route 4 Access Road at Station 15165+00 will cross an existing farm field and wooded area. The access road will also cross over the old Champlain Canal prism.

Old State Road access road at Station 15196+00 will primarily cross several extant farm fields as well as wooded areas. A portion of the access road will cross the old Champlain Canal. It appears the landowner may have filled

* The area will be monitored by a qualified archeologist during construction, see Section 6.

the old Champlain Canal to access fields on the east side of the former canal. The access road will also cross the meandering channel of the former Wood Creek.

Route 4 Access Road at Station 15240+00 connects the state highway with the railroad grade. Here the access road crosses the old Champlain Canal prism and an extensive series of wet areas before reaching the CP Rail ROW.

The old Champlain Canal prism is listed on the State Register and has been demined eligible for the National Register. Three of the proposed access roads will need to cross over portions of the former prism that appear to still be somewhat intact. The Project proposes to cross the former canal utilizing timber mats as supports and decking (Figure 2). It is recommended that the installation and removal of the timber mat bridging be monitored by the Consulting Archeologist to ensure that the prism is not adversely affected by the construction of the access road.

Additionally, the roads may utilize timber mats or geotextile fabric over the existing surface to limit ground-disturbing activities (particularly in active farm fields). Should this be unfeasible, and grading of the topsoil is necessary, this activity should be monitored by the Consulting Archeologist.

Table 4. Access Roads for Segment 3, Package 1C from Whitehall to Fort Ann.

Description	Station Number	Activity	Notes/Recommendations
Access Road Poultney Street	15036+50	Uses existing drive, also sloped.	No archeological work.
Access Road Off NY Route 4	15069+00	Utilizes disturbed area crossing former Champlain Canal route (canal prism no longer discernible).	No archeological work.
Access Road off NY Route 4	15165+00	Through farm fields and over Champlain Canal prism.	Archeological monitoring for road. Monitoring during installation of temporary bridge over canal.*
Access Road off Old State Road	15196+00	Through farm fields, over the Champlain Canal prism, and over Wood Creek channel.	Archeological monitoring for road. Monitoring during installation of temporary bridge over canal.*
Access Road off NY Route 4	15240+00	Through farm fields and over Champlain Canal prism.	Archeological monitoring for road. Monitoring during installation of temporary bridge over canal.*
Access road off NY Route 4	15289+00	Utilizes exiting disturbed area.	No archeological work.

* The area will be monitored by a qualified archeologist during construction, see Section 6.

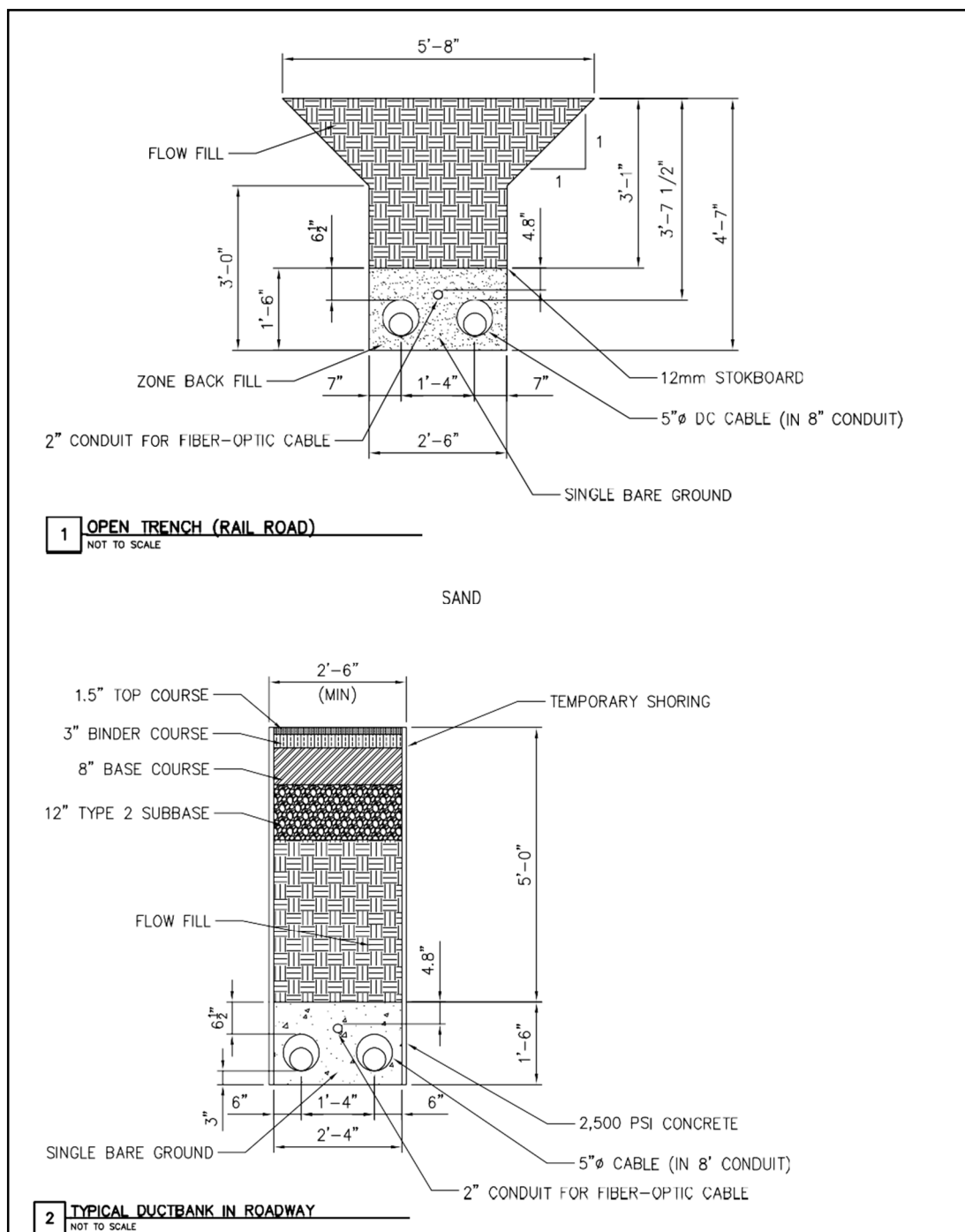


Figure 1. Typical open trench (railroad) and duct bank (roadway) installation of the cable illustrated.

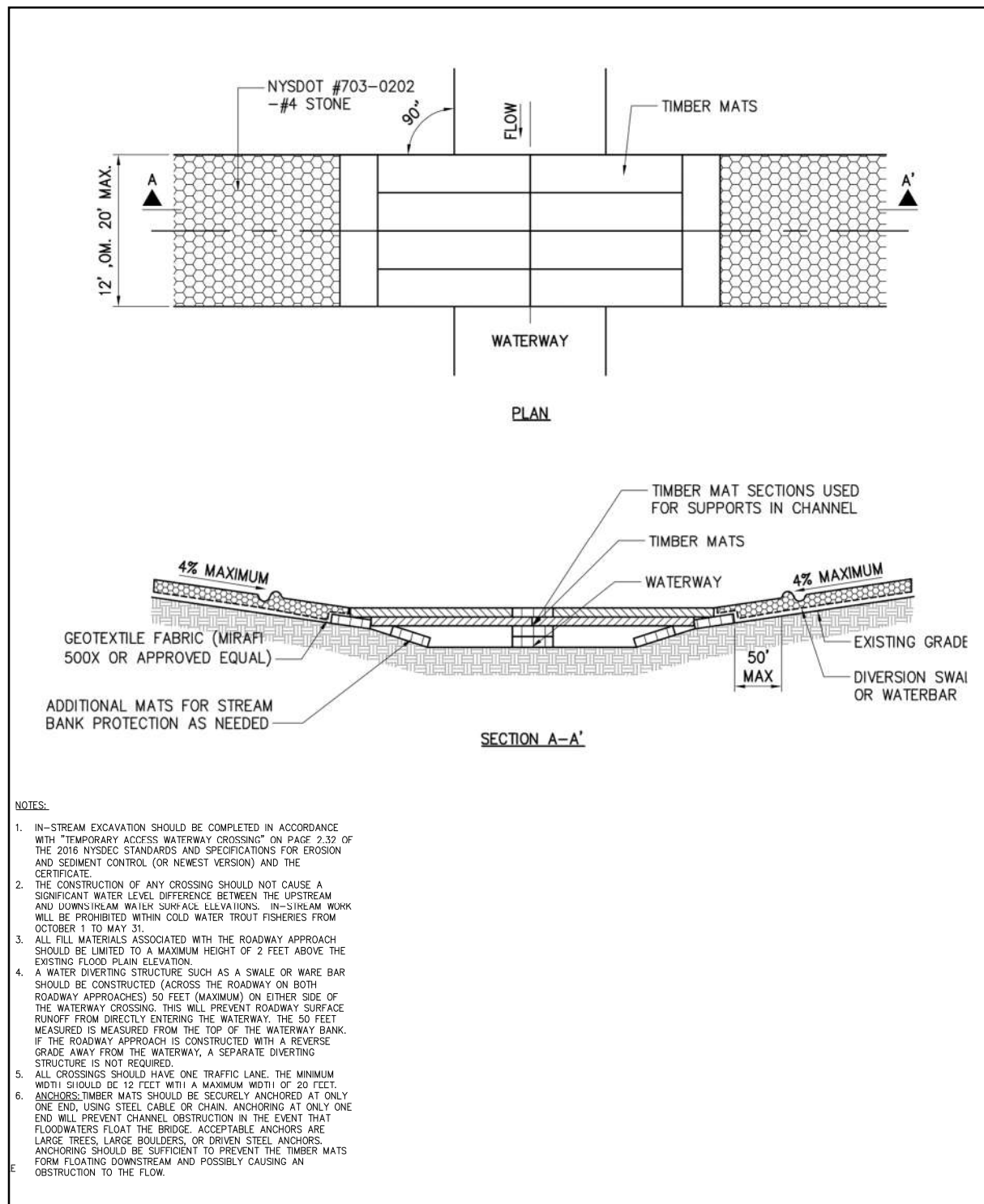


Figure 2. Schematic of typical crossing of streams including the old Champlain Canal prism, filled to various extents throughout the Project.

3.2.4 Excursions from Permitted Route

Due to other design and engineering constraints (particularly wetlands and other environmental factors), the proposed cable route and associated, temporary access roads deviate outside of the area previously archeologically considered.

In Package 1C of Segment 3, none of the cable route deviations are significant, nor do they extend into areas with moderate to high archeological potential. However, two of the excursions (#3 and #4) are near the old Champlain Canal prism; as a result, monitoring during construction is recommended for those two excursions.

Table 5. Deviations or Excursions from Permitted Route in Segment 3, Package 1C.

Deviations	Station Number	Activity	Notes/Recommendations
Excursion S3-P1C #1	15032+20 to 15040+61	Existing gravel access road and disturbed, Splice 31 and Access Road from Poultney Street.	No archeological work.
Excursion S3-P1C #2	15045+14 to 15045+62	Area previously disturbed.	No archeological work.
Excursion S3-P1C #3	15069+45 to 15188+50	HDD 4.A, to avoid historic Champlain Canal prism.	Archeological monitoring.*
Excursion S3-P1C #4	15197+75 to 15128+86	HDD 6, to avoid historic Champlain Canal prism.	Archeological monitoring.*
Excursion S3-P1C #5	15230 to 15252	Limited surface disturbance due to HDD 6. Area is wet and sloped.	No archeological work.
Excursion S3-P1C #6	15232+28 to 15252+45	Limited surface disturbance due to HDD 7. Crosses Ryder Road with an open cut trench.	No archeological work.
Excursion S3-P1C #7	15301+73 to 15304+55	HDD 8 south pit and work area.	No archeological work.

3.3 Historic/Archeological Properties within/along the Cable Route

During the 2012 survey of the CP rail section of the Project, Hartgen identified 21 archeological sites. Of these, one is located within Segment 3, Package 1C: CHPE Site 21 Whitehall Midden. The proposed cable route in relation to this resource is described in more detail below.

In addition, the modern Barge Canal and the former alignment of the old Champlain Canal lie within and along the proposed cable route. The modern New York Barge Canal Historic District has been listed on the National Register and also determined to be a National Historic Landmark. The Barge Canal property boundaries are to the east of the current segment and no impacts are expected. The old Champlain Canal is listed on the State Register, and its former canal prism crosses under the cable route and several of the access roads.

3.3.1 CHPE Site 21/Whitehall Midden (11541.000434)

This site was identified by Hartgen during Phase IB testing for the Champlain-Hudson Power Express (Hartgen Archeological Associates 2012). The archeological deposits of the site range along both sides of the CP railroad tracks in a developed portion of the Village of Whitehall. There were significantly fewer artifacts found on the west side of the tracks than on the east side.

Artifacts from the site include a variety of 19th- and 20th-century finds, with numerous fragments of vessel glass (from pharmaceutical bottles, soda bottles, and jars), and of tableware ceramics (whiteware, porcelain, salt-glazed stoneware, and yellowware). Building materials found include drainpipe fragments, window glass, nails, brick and mortar fragments, and roofing slate. The artifact assemblage suggests the site post-dates 1850, as it

* The area will be monitored by a qualified archeologist during construction, see Section 6.

lacks earlier tableware ceramics such as pearlware and creamware. This date range aligns with the construction of the railroad and may indicate association with the NRE structures. Due to the proximity to these NRE properties, the midden may have research value, and a Phase II archeological evaluation was recommended if the site cannot be avoided in construction.

The cable route will be sited on the west side of the tracks, the side of the tracks with the fewest artifact finds. Additionally, along the west side of the tracks, the natural landform has been cut and filled and otherwise disturbed to accommodate the railroad grade. No additional archeological testing or monitoring is recommended based on current Project plans.

3.3.2 Old Champlain Canal (90NR02762)

The old Champlain Canal has been listed on the State Register of Historic Places. However, the property does not appear to have ever been nominated to the National Register. The archeological site has been affected by filling and other disturbances. It appears that in the portions which will be crossed by the proposed access roads, landowners have filled the canal prism to various extents. Engineers have suggested utilizing timber mats to span the canal. It is recommended that the Consulting Archeologist monitor the installation and removal of the mats to document potential disturbances to the canal prism, although none are anticipated.

Where the cable route crosses the old Champlain Canal at Stations 15256+00 to 15269+50, the cable will be directionally drilled (HDD 7). The cable will be located on the west side of the CP Rail ROW. No impacts to the canal are anticipated in this portion of the Project, but archeological monitoring of the work is recommended to ensure the resource is not impacted and to document Project activities.

3.3.3 NYSM 7501

This site is represented as a very broad area that focuses on the original channel of Wood Creek (later dramatically transformed by the original Champlain Canal and then the Barge Canal). The site is presumed to be precontact in age. These types of sites do not provide specific locations of archeological deposits and features, but they do suggest an elevated sensitivity for precontact resources within and adjacent to them. No impacts to the site are anticipated, but archeological monitoring is recommended for the Splice 38 and 39 work areas.

Table 6. Project Activities near or within Known Archeological Sites.

Resources	Activity	Location	Conditions	Recommendation
CHPE Site 21/Whitehall Midden [11541.000434]	Cable installation in open trench.	Village of Whitehall	Within Railroad ROW.	No further work, as the cable will be placed on the west side of the tracks away from the majority of the deposits.
Old Champlain Canal (90NR02762)	HDD 7	Town of Whitehall, Station 15256+00 to 15269+50	Within Railroad ROW.	Archeological monitoring of the drilling is recommended to ensure the resource is not impacted and to document Project activities.*
	Access Road off NY Route 4 at Stations 15069+00, 15165+00, 15169+00, and 15240+00.	Town of Whitehall	Outside of permitted route.	Archeological monitoring of the installation and removal of the timber mat bridging to ensure that the prism is not adversely affected.

* The area will be monitored by a qualified archeologist during construction, see Sections 6.

Resources	Activity	Location	Conditions	Recommendation
NYSM Site 7501	Cable route, HDD, and Splice locations.	Town of Whitehall	Mostly within permitted route. Subjected to previous testing (Hartgen 2012)	Test or monitor work areas that extend outside of permitted route (Splices 38 and 39).*

* The area may be shovel-tested by a qualified archeologist prior to construction or monitored by a qualified archeologist during construction, see Sections 2.2 and 6, respectively.

3.4 Construction Timeline

The construction timeline is November 2022 to December 2025 for the entire project.

4 Cultural Resource Management Plan

4.1 Objective

It is the objective of this CRMP to demonstrate a comprehensive plan for encountering cultural resources during the construction and installation of the transmission line, and of various other components associated with the transmission line.

TRC created a CRMP for the permitting process, with an overall permitting CRMP created in 2015, and subsequent revisions and addendums in 2021. This current report serves as the Supplemental CRMP for the now planned construction activities, synthesizing the previously reported data into one document and identifying roles and points of contact for communication ease. No areas of archeological monitoring have been previously identified in this portion of the Project.

The CRMP also adheres to the Best Practices Management Plan (BMP) developed by the Certificate Holder, Transmission Developers Inc., in 2012 as agreed upon the Department of Public Services and other stakeholders.

Currently the Consulting Archeologist (CA) for the terrestrial portion of the Project is Matthew Kirk, Hartgen Archeological Associates, Inc. The Project Preservation Officer (PPO) is Ashley L. Bushey from the construction team, Kiewit.

4.2 Heritage Areas, Special Events, and Other Resources

As part of the Section 106 process, the federal agency solicited comment and feedback from Tribal Nations that have expressed an interest in the regions in which the Project is to be constructed. As part of that endeavor, no traditional cultural properties were identified within or immediately adjacent to the Project. No other heritage areas or special events have been identified within this segment of the Project. The Certificate Holder, and its assignees, continue to solicit information from the public and other stakeholders to identify such areas, should they exist. If a heritage area or special event is identified, the Project will coordinate mitigation measures which may include restrictions on workspace or access to sites, scheduling considerations, or work hour reductions. No such areas have been identified within the current Segment 3, Package 1C alignment.

4.3 Project Preservation Officer (PPO)

Hartgen will act as the Consulting Archeologists (CA) for the purpose of this effort. The CA will work closely with the Project Preservation Officer (PPO); the PPO, or their designee, will be present for all ground disturbing activities, and will have “stop-work” authority. The PPO will be part of the prime construction management team, Kiewit Corporation.

It is the responsibility of the CA to train this individual as a PPO and to provide a hands-on workshop for construction personnel, as designated by the PPO. The PPO and the construction team should have an understanding of cultural resources present in different areas, as well as understanding the potential for unknown cultural deposits. It is the responsibility of the PPO to implement the CRMP and ensure that the requirements and conditions of the CRMP are met. Table 7 includes the necessary contact information.

The PPO will have the authority to cease excavation or construction work. In the event cultural materials or human remains are encountered, it is the responsibility of the PPO to halt construction activities and contact and coordinate with the CA to visit the location of the discoveries as quickly as possible. Unanticipated discoveries, such as human remains, will follow the protocols developed by OPRHP in 2021 in consultation

and coordination with the state's Tribal entities. This protocol supersedes previous iterations presented in the BMP, CRMP (2021), and other related documents and plans (Appendix 2).

In the event of these discoveries, the CA will have up to three workdays to document and recover cultural material from the APE before the construction continues. The CA, in consultation with the PPO and the NYSHPO, may request additional archeological field assistance to complete the necessary work in a timely manner. It is the responsibility of the PPO to work with the appropriately trained archeologists to ensure that the survey and assessment of any change in the APE is completed prior to construction taking place.

4.4 Identification of Historic Properties

Changes in the APE or modifications to work proposed within the APE will prompt review of the subject location(s) for historic properties. The review will include archeological survey as specified in the CRMP (2021) in addition to completion of a files search that will include previous survey data through New York CRIS, and which may be supplemented with local assessor records, historic topographic maps, historic aerial images, Sanborn Fire Insurance and other historic maps, and other resources as available.

Properties are typically considered to hold historic potential when they meet or exceed 50 years of age. The Project may elect to consider the historic potential of properties approaching this age threshold to accommodate anticipated construction horizons. The Project will complete a survey evaluation for properties that meet or exceed the age threshold for historic potential, have no existing determination of NRHP eligibility or a determination ten or more years old, and may be affected by project activities. The evaluation will be completed by a cultural resource specialist who meets or exceeds the Secretary of the Interior's Professional Qualification Standards (SOI Standards) in a discipline appropriate for the subject site; archeological sites will be evaluated by professionals who meet or exceed the SOI Standards in the area of archeology; architectural and landscape sites will be evaluated by professionals who meet or exceed the SOI Standards in the area of Architectural History. Survey evaluations will be subject to quality assurance review by a professional other than the author(s) who meets or exceeds applicable SOI Standards. Survey information will be input into the New York CRIS system prior to submission of annual reports on January 10 of each calendar year this agreement is in effect.

4.5 Reporting Requirements

The CRMP (2021) establishes a requirement for annual reporting concerning activities conducted under the CRMP (2021): *The PPO will prepare an annual report to the DOE and NYSHPO (and any of the other signatory or consulting parties listed in the Programmatic Agreement), which summarizes activities conducted under this CRMP on an annual basis for as long as this CRMP is in effect (i.e., through post-construction monitoring). The report will be completed and submitted on or before January 10 of each year. The CRMP may be updated and/or revised as appropriate to improve its implementation so long as concurrence is reached by the parties involved is achieved. The annual report will include a summary of all historic properties and archaeological resources that may have been encountered during construction and how they were treated. Post-construction reports will identify which cultural resources were monitored and provide a summary of resource conditions and whether looting or other forms of ground disturbance were noted (TRC 2021).*

The PPO will establish and maintain:

- A system of tracking archeological monitoring reports;
- Application of Program Comments, Exemptions, or Program Alternatives;
- Application of Programmatic Allowances;
- Implementation of Treatment Measures;
- Potential changes to APE;
- Annual report that summarizes the above items stipulated by the CRMP (2021).

4.6 Barriers and Other Protective Measures

No additional protective measures with respect to cultural resources have been identified or requested by stakeholders for the current segments of the Project. If portions of the Project are altered, additional assessment, which may include desktop review, pedestrian survey, and/or archeological shovel tests, will be required to determine the presence or absence of cultural resources. Should cultural resources be identified, the Certificate Holder will avoid these resources if possible. Protective measures may include installation of temporary fencing and/or site delineation on Facility maps. Should an archeological site be impacted by Project activities, mitigation will include notification procedures and data recovery as stipulated in the Section 4.0 of the CRMP, and/or other treatment measures determined through consultation with NYSHPO, Tribal Nations, and consulting parties.

4.7 Programmatic Allowances

Activities considered Programmatic Allowances are not exempt from archeological monitoring and remain subject to unanticipated discovery protocols, including stop-work provisions, as contained in the CRMP (2021).

Programmatic Allowances include actions where historic properties will not be affected, or effects to historic properties hold limited potential to diminish historic integrity. Where Programmatic Allowances are applicable, the action will not require independent consultation with the State Historic Preservation Office (SHPO).

Application of Programmatic Allowances requires review by Project Preservation Officer (PPO). The PPO must complete:

- Memorandum to file containing a verbal description of work proposed, and a verbal description and map of the geographic area of the work;
- Summary of file search and/or literature review conducted to identify potential historic properties,
- Description of historic properties affected (if any);
- Justification for the application of one or more Programmatic Allowances.

The Project will maintain a tracking system of memoranda applying Programmatic Allowances, which will be communicated to NYSHPO and the Programmatic Agreement signatories in an annual report.

In addition to the Programmatic Allowances contained in this document, the Project may include application of relevant Section 106 Program Comments and program alternatives including but not limited to:

- Program Comment for Actions Affecting Post-1945 Concrete and Steel Bridges (*Federal Register*, Vol. 77, No. 222, November 16, 2012)
https://www.achp.gov/sites/default/files/program_comments/2017-01/program%20comment%20concrete%20and%20steel%20bridges.pdf
- Program Comment to Exempt Consideration of Effects to Rail Properties within Rail Rights-of-Way (*Federal Register* Vol. 84, No. 125, June 28, 2019)
<https://www.govinfo.gov/content/pkg/FR-2019-06-28/pdf/2019-13779.pdf>
- Advisory Council on Historic Preservation (ACHP) Exemption Regarding Historic Preservation Review Process for Effect to the Interstate Highway System (*Federal Register* Vol 70, No. 46, March 10, 2005)
https://www.achp.gov/sites/default/files/exemptions/2017-01/final_interstate_exemption_notice.pdf

4.7.1 Transportation Facilities

- A. Resurfacing existing roadways and/or replacement in-kind of highway signals, signage, or appurtenances when approved by the owner of the transportation facility.

- B. Replacement in-kind of railroad signals, crossing materials, and other railroad features or appurtenances when approved by the owner of the transportation facility.
- C. Installation of utility attachments on bridges in areas with existing utility attachments.

4.7.2 Ground Disturbing Activities

- A. Ground disturbing activities within areas of documented previous disturbance.
- B. Ground disturbing activities within non-historic and non-contributing properties or features when no vertical improvements are proposed. Vertical improvements may consist of, but are not limited to, buildings, structures, and other form of infrastructure with height above ground and constructed by the project.
- C. Ground disturbing activities within historic and contributing properties when action is discrete (including but not limited to edges of agricultural fields, wooded areas, lawns, or curbs), where no contributing or potentially contributing buildings, structures, objects, sites, or features are present (including but not limited to slate sidewalks, hitching posts, carriage steps, mature trees, fences, retaining walls, and other landscaping dating to the historic period of 50 years or more in age).

4.7.3 Temporary Staging and Temporary Facilities

- A. Temporary staging or stockpiling within existing parking areas.
- B. Temporary staging or stockpiling within transportation rights of way.
- C. Temporary staging or stockpiling within areas with documented previous ground disturbance when the ground is returned to pre-construction appearance, including contours and vegetation.
- D. Installation of temporary construction support facilities when the ground is returned to pre-construction appearance, including contours and vegetation.
- E. Location of temporary construction trailers not requiring a foundation or pad.

4.7.4 Utilities, Lighting, and Maintenance Facilities

- A. Installation of underground utilities using directional bore drilling or similar method.
- B. Replacement, repair, and/or maintenance of existing underground utilities in-kind when work occurs within the existing utility footprint.
- C. Installation, replacement, or upgrade to lighting within transportation rights of way and/or at Project locations requiring routine maintenance.
- D. Establishing maintenance facilities within Project easements or right of way no more than 10-feet high with a footprint no more than 120 square feet when facility is not located within a State Register of Historic Places (SRHP) or National Register of Historic Places (NRHP) historic district.

4.7.5 Pre-Construction Due Diligence and Testing

- A. Conducting geotechnical testing, hazardous materials sampling, seismic or vibration testing or monitoring, or drill samples.
- B. Wetland testing and delineation.
- C. Wildlife surveys and inventories.
- D. Property line and ownership verification surveys.
- E. Utility location surveys.

4.7.6 Hazard and Hazardous Waste Removal

- A. Removal of debris related to weather or storm damage, or present as a result of modern dumping.

- B. Hazardous waste removal.

4.7.7 Environmentally Sensitive Area (ESA) Protection and Mitigation

- A. Installation of temporary fencing to protect areas of cultural, biological, or other environmentally sensitive area from the effects of construction.
- B. Obtaining credits in/from and existing wetland mitigation bank.
- C. Vegetation or landscaping to support habitat mitigation when the subject action affects less than one-half acre and does not occur within an archeologically sensitive area, as defined by the Supplemental CRMP.

4.7.8 Drainage Improvements

- A. Erosion control measures including placement of best management practices, rip rap within non-historic channels, and emergency erosion control measures.
- B. Re-grading or re-establishing existing drainage channels.
- C. Temporary drainage systems including culvert placement and grading, provided the area is returned to pre-construction appearance.
- D. Replacement or up-sizing corrugated metal pipe (CMP), concrete box culvert (CBC), reinforced concrete pipe (RCP), and plastic pipe culverts where no architectural headwalls or wingwalls are present or where these features, if present, will remain in place.

4.7.9 Signage and Surveillance

- A. Installation, maintenance, repair, or removal of security systems.
- B. Installation of signage not located within a NRHP district.
- C. Replacement of existing signs; including within a NRHP district when replacement is in-kind and at the same location as the sign to be replaced.
- D. Maintenance, repair, or removal of signage.
- E. Installation of less than 100 linear feet of security fence within Project easements or right of way when not located within a SRHP or NRHP historic district.

4.7.10 Easements and Right of Way

- A. Acquisition of easements or right of way from non-historic properties and when not located within a State Register of Historic Places (SRHP) or National Register of Historic Places (NRHP) historic district.
- B. Acquisition of easements or right of way for subterranean activities when no surface rights or access is conferred.

4.8 Treatment Measures

When Project actions do not qualify as Programmatic Allowances, the Project will complete an evaluation of the potential for actions to diminish the historic integrity of historic or archeological resources, as defined in 36 CFR Part 800.5(a)(1). The Project may reference applicable National Register Bulletins, published by the National Park Service, to support the evaluation. Project actions found to diminish integrity as defined in 36 CFR Part 800.5(a)(1) will require Treatment Measures. The Project will complete a memorandum documenting eligibility of the resource(s), application of the criteria of adverse effect, avoidance measures considered, efforts to minimize the effect, coordination with property owner(s) or local government(s) in selection of Treatment Measures if applicable, and rationale for application of the selected Treatment Measure, if applicable. A separate Memorandum of Agreement (MOA) will not be required when one or more of the following Treatment

Measures are selected. If the Project action is determined not to diminish integrity, further action will not be required.

The Project will maintain a tracking system of memoranda and Treatment Measures, which will be communicated to NYSHPO and the Programmatic Agreement signatories in the annual report.

This section will not apply to designated National Historic Landmark properties, as consultation with the Department of the Interior is required (36 CFR Part 800.10), generally conducted via consultation with the National Park Service.

4.8.1 Data Recovery

Data recovery and reporting is the preferred mitigation for archeological sites. Implementation of this Treatment Measure will follow protocol contained in CRMP (2021) Section 4.0 Project Effects and Management Measures. Additional details concerning data recovery for resources identified during archeological monitoring or that are unanticipated discoveries are outlined in more detail below.

4.8.2 Certified Local Government or Historic Preservation Board/Commission Priority Project Sponsorship

The Project crosses through several Certified Local Government (CLGs) jurisdictions. CLG programs are divisions of municipal or county government which can create and implement local-level historic preservation planning and programming. Many CLGs maintain a formal historic preservation plan containing goals and priority projects for preservation activities within their jurisdiction. Whether or not a CLG maintains a formal historic preservation plan, all are required to maintain a system of identification and documentation of historic properties, sometimes referred to as historic survey. Communities may also maintain a Historic Preservation Board, Commission, or similar entity and choose not to become a CLG. Each program will formally or informally document preservation priorities within their jurisdictions, often identifying lack of funding as a significant barrier to implementation.

Site-specific mitigation often has limited value to advance historic preservation in a community. To create broader impact to the historic properties and the communities they serve, the Project may coordinate with CLGs or Historic Preservation Boards/Commissions to sponsor one or more of the priority projects identified within that entity's jurisdiction and not necessarily within the Project APE.

Example projects include, but are not limited to, historic surveys, State or National Register Nominations, historic context documentation, completion (or update) of a strategic preservation plan, completion of a strategic historic survey plan, archeological or architectural history field schools, historic preservation technical trainings or workshops, workshops related to historic preservation tax credits, and more.

New York CLGs are listed on the NYSHPO website at: <https://parks.ny.gov/shpo/certified-local-governments/listing.aspx>

4.8.3 Digital Photography Package

Prior to implementation of the work necessitating implementation of Treatment Measures, a digital photography package will be prepared by an individual meeting the Secretary of the Interior's Professional Qualification Standards. The photography package will include images demonstrating the property in its setting and context, images showing each exterior building elevation, images showing the spatial relationships of building(s) and features of the site, and appropriate detail images. A map showing photograph locations and view direction will be included. A photography log will be included containing photograph numbers, cardinal direction viewpoint, historic resource name and number (if applicable), street address (if applicable), city or town, county, state, and image description. The digital photography package will follow the National Park Service photography standards for the National Register of Historic Places:

https://www.nps.gov/subjects/nationalregister/upload/Photo_Policy_update_2013_05_15_508.pdf

Copies of the photography package on archival CD will be provided to NYSHPO, local Historic Preservation Board or Commission, and/or interested local or state repositories. One set of archivally produced, archivally labelled photographs will be provided to the NYSHPO.

4.8.4 National Park Service Heritage Documentation (HABS/HAER/HALS)

Prior to implementation of the work necessitating implementation of Treatment Measures, the property subject to the work will be documented to National Park Service standards using the appropriate heritage documentation form: Historic American Building Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS). Work will be completed by a Cultural Resource Specialist who meets or exceeds the Secretary of the Interior's Professional Qualification Standards. The appropriate level of documentation (Level I, Level II, Level III) will be selected based on the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation, as published in the Federal Register July 21, 2003: https://www.National Park Service.gov/hdp/standards/standards_regs.pdf

The Project will follow HABS/HAER/HALS Standards & Guidelines published by National Park Service Heritage Documentation Programs. The Project will coordinate with the National Park Service Northeast Region to obtain an applicable HABS/HAER/HALS. The Project will complete comment resolution with the National Park Service Northeast Region and submit final documentation for transmittal to the Library of Congress.

4.8.5 Public Interpretation

Public interpretation will be designed and produced, which may include print or digital media, on-site or off-site signage, workshops or technical trainings, or other means of engaging and educating interested public regarding historic properties. If the public interpretation involves physical signage, installation will require agreements from the landowner accepting the sign(s) including responsibility for maintenance.

Completion of public interpretation as a Treatment Measure will be executed independent of the commitment to provide \$5,000 in educational investment included in the CRMP (2021).

4.9 Property Owner Requests

The Project may accommodate property owner requests, including privately and publicly held properties, that may exceed Project needs or requirements. If a property owner request accommodated by the Project escalates permitting, consultation, or Treatment Measure requirements, the subject property owner will assume responsibility for associated costs.

5 Archeological Monitoring Methodology

5.1 Objective

The objective of the archeological monitoring is to identify and document archeological deposits that may be encountered in areas that were previously inaccessible for archeological survey or not considered during the initial resource assessment, specifically in those areas outside of the originally permitted route. The monitoring methodology is established to create an efficient and streamlined notification process and means to determine the potential eligibility of resources for inclusion on the National Register, and for the creation and adoption of timely and effective mitigation strategies.

5.2 Monitoring

The Consulting Archeologist will observe the contractor's excavations within designated areas as indicated by station numbers in the Supplemental CRMPs (Table 8). On the basis of such observations, the Consulting Archeologist may request a short-term cessation of work in the vicinity of a potential archeological site or find in order to record information or to evaluate exposed archeological deposits. The Consulting Archeologist may

request the on-site supervisor for time to evaluate significant finds, deposits, or other archeological materials in an effort to assess their eligibility for the National Register.

The Consulting Archeologist may direct the Contractor's workers in the use of machinery on a limited basis to assist in the exposure of material of archeological importance. This assistance will comprise work which would otherwise be done without archeological involvement, but where archeological direction can ensure that significant material is not disturbed.

The Consulting Archeologist will inspect excavation areas, soil profiles, and backdirt piles, and will collect artifact and soil samples as appropriate. The Consulting Archeologist will map and document archeological deposits using field notes, photography, and measured scale drawings. The locations of archeological deposits will be mapped with a submeter GPS unit.

Archeological monitoring and associated site or find evaluation time will vary depending on the type of site or find encountered. Typical stop-work requests to complete archeological evaluation will be accommodated within one hour or less, often within fifteen minutes. Stop-work will be limited to an area within 50 feet of the potential archeological find; work may continue outside the area of the potential archeological find provided the work occurs in an area not subject to archeological monitoring, or, if the work will occur in an area subject to archeological monitoring, provided that an additional archeologist is available to observe the work.

5.3 Notification

For archeological finds that may be National Register-eligible but cannot be adequately recorded during a short cessation of work (typically one hour or less per find) and cannot be otherwise avoided, the Consulting Archeologist will notify the on-site Supervisor and request a halt to construction activities near the find. The Consulting Archeologist shall notify the Project Preservation Officer (PPO), who shall in turn notify the NYSHPO, other stakeholders and Tribal Nations, as appropriate within 24 hours of the initial reporting of the finds, per the Certificate Conditions 110 and 111. During this time, work in the immediate vicinity of the find must halt and the area of concern fenced or otherwise protected from construction activities. Once the area is secured, activity adjacent to the find may continue during the consultation process. Per 36 CFR Part 800.13(b)(3), NYSHPO, other stakeholders and Tribal Nations will have 48 hours from the time of notification to respond.

5.4 Determination of Eligibility

The NYSHPO will make a determination of National Register eligibility for the archeological resource based on the information provided by the Archeological Monitor and PPO. The NYSHPO shall receive this information from electronic communications and respond within 48 hours, per 36 CFR Part 800.13(b)(3).

5.5 Determination of Effects, Mitigation Efforts and Dispute Resolution

It is expected that potential archeological finds will be located within a relatively narrow construction corridor with limited means for avoidance. When a site is determined eligible for inclusion on the National Register, avoidance is not possible, and continued construction requires disturbance of the site, the resulting Section 106 determination of effect will be Adverse Effect. Determinations of Adverse Effect require mitigation treatment to resolve; a separate Memorandum of Agreement will not be required when mitigation treatments contained within this document, or within a CRMP associated with the area of the archeological site, is selected. Dispute resolution among the parties will be guided by the CRMP (2021).

5.6 Data Recovery Mitigation Strategy

Data recovery mitigation strategy will be outlined in a brief plan that provides guidance on the level of effort expected, square meters of excavation, sampling percentage, and number of anticipated feature excavations. The strategy will provide a schedule for the proposed recovery/documentation efforts, including options to expedite the process, which may include 10-hour working days and additional crew. The mitigation plan shall

also include a protocol for artifact collection, processing, cataloging, analyses, and final curation of materials, as outlined in the CRMP (2021) Section 4.3. The data recovery plan will be provided to NYSHPO, Tribes, and other stakeholders prior to implementation; these parties will have up to 15 days to review and provide comment. Data Recovery can begin as soon as notification to proceed is provided from NYSHPO. The PPO will notify the NYSHPO, Tribes, and other stakeholders of the completion of the fieldwork and that portion of the project shall be cleared to resume construction.

5.7 Alternative Archeological Mitigation

Alternative archeological mitigation efforts that contemplate non-traditional excavation and/or data recovery methods may be appropriate considering the circumstances. Numerous treatment methods may be selected including, but not limited to, off-site archeology, non-invasive archeology in the vicinity, and other appropriate strategies. Factors that may influence such decisions include the Project's constraints (in terms of construction corridor width and depth), weather and soil conditions, hazardous work environments, other health and safety concerns, and Project schedule.

6 Communication

Through the many moving parts of this Project, efficient and immediate contact and consultation will be vital. The Project contacts are listed in the table below:

Table 7. Project Contacts.

Agency/Organization	Role	Contact person	Contact information
Kiewit Corporation	Project Preservation Officer	Ashley L. Bushey	Ashley.Bushey@Kiewit.com 802.349.6388
CHA Consulting, Inc.	Consulting Engineer	Chris Einstein	ceinstein@chacompanies.com 518.453.4505
U.S. Department of Energy	Stakeholder	Melissa Pauley	melissa.pauley@hq.doe.gov
U.S. Army Corps of Engineers	Stakeholder	Stephan Ryba	Stephan.a.ryba@usace.army.mil
New York State Historic Preservation Office (NYSHPO)	Stakeholder	Nancy Herter	Nancy.herter@parks.ny.gov 518.268.2179
New York DPS	Stakeholder	Matthew Smith	matthew.smith@dps.ny.gov
Hartgen Archeological Associates	Consulting Archeologist	Matthew Kirk	mkirk@hargen.com 518.283.0534 518.300.5940
Transmission Developers Inc.	Applicants/Owner	Ayokunle "Kunle" Kafi, PE, CEM	Ayokunle.kafi@transmissiondevelopers.com 347.920.6550
Delaware Nation	Tribal Nation	Carissa Speck	(405) 247-2448, Ext. 1403 cspeck@delawarenation-nsn.gov
Delaware Tribe of Indians	Tribal Nation	Susan Bachor	610.761.7452 sbachor@delawaretribe.org
Shinnecock Nation	Tribal Nation	Jeremy Dennis	631.283.6143 adminoffice@shinnecock.org jeremynative@gmail.com
St. Regis Mohawk Tribe	Tribal Nation	Darren Bonaparte	518.358.2272, ext. 2163 darren.bonaparte@srmt-nsn.gov
Stockbridge-Munsee Community	Tribal Nation	Jeff Bendremer	413.884.6029 thpo@mohican-nsn.gov
National Park Service	Stakeholder	Kathy Schlegel	215.597.1726 kathy_schlegel@nps.gov
Advisory Council on Historic Preservation	Stakeholder	Stephanie Stevens	202.354.2102 stephanie_stephens@nps.gov

7 Deliverables

7.1 Periodic Updates

The PPO in coordination and under the guidance of the CA will provide periodic (bimonthly) updates on the progress of cable installation via email to the stakeholders. The communication will include project progress, discussion of unanticipated cultural resources, and the schedule for future work.

7.2 Annual Report

The CA will provide an annual report detailing the activities completed under the CRMP (2021) to the DOE and NYSHPO for as long as the CRMP is in effect. This report will be completed and submitted on or before January 10th each year. This report will include a summary of all historic properties and archeological resources encountered during construction and how they were treated. Post construction reports will identify which cultural resources were monitored and provide a summary of resource conditions and whether forms of disturbance were noted.

8 Summary of Recommended Archeological Effort

In Package 1C of Segment 3 no additional archeological work or monitoring is recommended for the cable route itself, apart from HDD or Splice areas. Although the cable will pass through CHPE Site 21/Whitehall Midden, most of the intact deposits are located on the opposite side of the tracks from the cable installation, and as a result no further archeological work is recommended.

Monitoring is recommended for the access roads at 15165+00, 15196+00 and 15240+00 that cross the old Champlain Canal prism. The Consulting Archeologist should monitor the installation and removal of the timber mat bridging to ensure the canal prism is not adversely affected. If ground disturbing activities such as grading are necessary for the access roads, additional archeological testing or monitoring is recommended for the remainder of the access roads.

HDD 7 will also pass under the old Champlain Canal prism between Stations 15256+00 to 15269+50 (the HDD conduit will cross below canal prism between Stations 15262+00 and 15264.00). It is recommended that the Consulting Archeologist monitor the bore hole drilling and document the prism before, during and after construction activities to record potential Project impacts, although none are anticipated.

Finally, the work areas associated with Splices 38 and 39 will extend outside of the permitted route. Testing or archeological monitoring is recommended for these Project activities.

Table 8. Resources and Archeological Recommendations in Package 1C of Segment 3, Whitehall to Fort Ann.

Activity	Station	Conditions	Resources	Recommendation
Cable route	15017+00 to 15033+00	Open, RR ROW	CHPE Site 21/ Whitehall Midden	No archeological monitoring. Previously tested, most archeological material on east side of tracks, cable placed on the west side.
HDD 7	15256+00 to 15269+50	Old Champlain Canal prism crossing, and nearby wet areas.	Champlain Canal	Archeological monitoring of HDD drilling activities. Document prism before, during and after construction.*
NY Route 4 Access	15165+00	Partial farm road	Champlain Canal	Monitoring during installation and removal of material in canal prism, and testing or monitoring of road if ground disturbance is anticipated.*

* The area will be monitored by a qualified archeologist during construction, see Section 6.

Activity	Station	Conditions	Resources	Recommendation
Old State Road Access	15196+00	Farm fields	Champlain Canal	Monitoring during installation and removal of material in canal prism, and testing or monitoring of road if ground disturbance is anticipated.*
NY Route 4 Access	15240+00	Farm fields	Champlain Canal	Monitoring during installation and removal of material in canal prism, and testing or monitoring of road if ground disturbance is anticipated.*
Splice 38	15246+21	Railroad ROW, Splice work area extends outside permitted route.	--	Test or monitor work area.*
Splice 39	15277+46	Railroad ROW, Splice work area extends outside permitted route.	--	Test or monitor work area.*

* The area may be shovel-tested by a qualified archeologist prior to construction or monitored by a qualified archeologist during construction, see Sections 2.2 and 6, respectively.

9 Bibliography

Hartgen Archeological Associates, Inc.

- 2012 *Phase IB Archaeological Field Reconnaissance and Phase II Archaeological Site Evaluation: Champlain Hudson Power Express, Canadian Pacific Railway Segment*, on file at OPRHP, Peebles Island, New York.

New York Archaeological Council (NYAC)

- 1994 *Standards for Cultural Resource Investigations and the Curation of Archaeological Collections in New York State*. NYAC, n.p.

TRC

- 2021 Champlain Hudson Power Express HVDC Transmission Line Project, Cultural Resources Management Plan (Final), on file at OPRHP, Peebles Island, New York.

**Appendix 1: Champlain Hudson Power Express Cultural Resources Management Plan
(TRC 2021)**

THIS DOCUMENT IS CONSIDERED PRIVILEGED AND CONFIDENTIAL AND NOT INCLUDED

Appendix 2: SHPO Human Remains Protocol 2021

**State Historic Preservation Office/
New York State Office of Parks, Recreation and Historic Preservation
Human Remains Discovery Protocol
(January 2021)**

If human remains are encountered during construction or archaeological investigations, the New York State Historic Preservation Office (SHPO) recommends that the following protocol is implemented.

- Human remains shall be treated with dignity and respect. Should human remains or suspected human remains be encountered, work in the general area of the discovery shall stop immediately and the location shall be secured and protected from damage and disturbance.
- If skeletal remains are identified and the archaeologist is not able to conclusively determine if they are human, the remains and any associated materials shall be left in place. A qualified forensic anthropologist, bioarchaeologist or physical anthropologist shall assess the remains in situ to help determine if they are human.
- If the remains are determined to be human, law enforcement, the SHPO, the appropriate Indian Nations, and the involved state and federal agencies shall be notified immediately. If law enforcement determines that the burial site is not a criminal matter, no skeletal remains or associated materials shall be removed until appropriate consultation takes place.
- If human remains are determined to be Native American, they shall be left in place and protected from further disturbance until a plan for their avoidance or removal is developed. Please note that avoidance is the preferred option of the SHPO and the Indian Nations. The involved agency shall consult SHPO and the appropriate Indian Nations to develop a plan of action. Photographs of Native American human remains and associated materials should not be taken without consulting with the involved Indian Nations.
- If human remains are determined to be non-Native American, the remains shall be left in place and protected from further disturbance until a plan for their avoidance or removal is developed. Please note that avoidance is the preferred option of the SHPO. The involved agency shall consult SHPO and other appropriate parties to develop a plan of action.
- The SHPO recommends that burial information is not released to the public to protect burial sites from possible looting.