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*Agency of Commerce and  
Community Development*

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May 15, 2017

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

**Re: VT SHPO Comments on Great River Hydro, LLC Study 33- Phase II Archaeological Site Evaluations, Wilder Hydroelectric Project (FERC No. 1892-026) and Vernon Hydroelectric Project (FERC No 1904-073), Public Archaeology Laboratory, Inc. (PAL).**

Dear Secretary Bose:

Thank you for the opportunity to comment on the above referenced projects.

The Vermont Division for Historic Preservation (VDHP) is providing the Federal Energy Regulatory Commission (FERC) with the following comments pursuant to 36 CFR 800.4, regulations established by the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act. Project review consists of assisting FERC in identifying the project's potential impacts to historic buildings, structures, historic districts, historic landscapes and settings, and known or potential archeological resources that are listed in or may be eligible for inclusion in the National Register of Historic Places.

As discussed in the March 30, 2017 Updated Study Meeting, the VDHP concurs with the PAL recommendation that five of the six pre-contact sites evaluated as part of the Phase II investigation are eligible for the National Register of Historic Places. Specifically, Vermont Archaeological Inventory (VAI) Sites VT-OR-34, VT-OR-62, VT-OR-108, and VT-OR-110 in the Wilder Hydroelectric Project, as well as VAI Site VT-WD-354 in the Vernon Hydroelectric Project contain archaeological deposits that have yielded or have the potential to yield information important to prehistory. The VDHP also concurs with the finding that the National Register eligibility of the Site VT-WD-355, the second site evaluated in the Vernon Project, is undetermined pending verification of the stratigraphic context within the area of potential effect (APE).

While the VDHP is in general agreement with the further recommendation that Great River Hydro, LLC, as new owners of the Projects, take measures to preserve and protect the six pre-contact sites evaluated during this investigation, it is imperative that mitigation strategies take precedence over monitoring. All six of the sites are situated adjacent to eroding scarps and significant deposits in the National Register eligible sites extend to the top of bank, indicating there has likely been substantial data loss. Implementation of data recovery excavation efforts in actively eroding site areas should occur immediately rather than waiting for the



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development of the Historic Properties Management Plans so that there is no additional data loss from these significant historic properties.

The positive eligibility determinations for five of the six sites subject to Phase II evaluation also underscores the necessity for continued efforts to obtain landowner permissions to complete Phase I site identification and Phase II evaluation studies in un-sampled portions of the APE within the Wilder, Vernon, and Bellows Falls Projects. As first noted in the VDHP's updated Study Plan comment on July 15, 2013 almost four years ago, completion of these actions is fundamental to fully considering the Projects impacts to historic properties in compliance with the National Historic Preservation Act. We look forward to continued consultation to achieve this goal.

Thank you for your cooperation in protecting Vermont's irreplaceable historic and archeological heritage. R. Scott Dillon reviewed this project and prepared this letter. I concur with the findings and conclusions described above.

Sincerely:

VERMONT DIVISION FOR HISTORIC PRESERVATION

Laura V. Trieschmann  
State Historic Preservation Officer

