



**Application of Iroquois Gas
Transmission System, L.P. for a
Certificate of Public Convenience
and Necessity**

FERC Docket No. PF07-7 / CP07-

**08/09 EXPANSION PROJECT
Boonville & Wright, New York
Brookfield, Newtown & Milford, Connecticut**

**DRAFT
APPENDIX F
UNANTICIPATED CULTURAL
RESOURCE DISCOVERY PLAN**

July 2007

PLAN FOR UNANTICIPATED DISCOVERY OF ARCHEOLOGICAL OR PALEONTOLOGICAL MATERIALS

Introduction

The Iroquois Gas Transmission System, L.P. (Iroquois) recognizes that it is possible for unanticipated historical properties, human remains, or paleontological materials to be discovered during construction. Strict compliance with state and federal regulations is required regarding any unanticipated discoveries.

Unanticipated discoveries that trigger the following procedures include:

- Building foundations or other historical structures with subsurface remains,
- Concentrations of artifacts or evidence of human occupation.

Part of the routine duties of the Iroquois environmental inspector(s) involves examination of trenches, building excavations, and/or spoil piles for evidence of previously unidentified cultural resources.

Paleontological materials, or fossils, are not subject to state or federal regulation. This project has not been surveyed for paleontological resources. However, the New York State Geological Survey has requested that it be notified immediately if any fossils are found during construction of the 08/09 Expansion Project loop segments.

Training

The identification of archaeological and paleontological resources requires basic training to recognize potential sites, and excavation techniques appropriate to site or resource discovery. Discovery of most artifact deposits during mechanical construction procedures is not likely given the nature of the work, and because of pre-construction archeological studies it is not likely that any such deposits would prove to be significant. It is possible however, that construction work could intercept undocumented historic structures or human remains.

To plan for such possibilities, all Iroquois inspectors and construction contractor personnel will be provided a basic orientation regarding recognition of structural or human remains. The purpose of this training will be to provide an overview of the general cultural history of the project area, so that both Iroquois and construction personnel will be aware of the kinds of archeological resources that have been and/or may be encountered in the field. In addition, the training program will emphasize the exact procedures to be followed in the event of a significant site discovery, such as a discovery of human remains, during construction.

The training will be designed to ensure that Iroquois personnel and construction contractors understand the extent of the completed pre-construction archaeological surveys and are fully aware of the distinction between sites that have been located and previously "cleared" and new discoveries during the construction process. Iroquois environmental inspectors will be provided with maps and plans showing all such known discoveries and will be responsible for keeping such documents available at construction sites.

Additional training will be provided for Iroquois environment inspectors to aid them in determining what constitutes a reportable or a significant discovery, as outlined in Procedures, Section 1 (below).

Procedures

Iroquois is committed to the protection and preservation of cultural resources, in accordance with federal and state legislation. Iroquois recognizes that, despite the intensive cultural resource field investigations that are typically performed prior to project construction, it is possible that previously unknown cultural resource sites could be discovered during the project construction process, particularly during excavation activities. Iroquois also recognizes the requirement for strict compliance with federal and state regulations and guidelines regarding the treatment of human remains, if any are discovered. The following procedures will be initiated in the event of discovering unanticipated cultural resources.

- 1) Construction contractor personnel involved in unanticipated discoveries of archeological materials must immediately suspend ground-disturbing activities and must notify the construction manager. The construction manager, in turn, must notify Iroquois' lead environmental inspector.

Iroquois environmental inspectors involved in unanticipated discoveries of archeological materials must direct construction contractors to suspend ground-disturbing activities and must notify the construction manager. The Iroquois environmental inspector will be responsible for determining whether the discovery is 1) a new, potentially significant discovery and/or 2) within a site that was previously "cleared" for construction by NY or CT State Historic Preservation Officer (SHPO) through pre-construction Phase II or Phase III archeological investigations.

- 2) Unless specifically documented in a Phase II or Phase III archeological report, any intact archeological feature or structure, such as a concentration of stones or burned soil, would be considered a potentially "significant" discovery.

If the archeological feature or structure encountered was already specifically documented in a Phase II or Phase III archeological report, no further work or actions are required. If the archeological feature or deposit was not specifically documented in a Phase II or Phase III archeological report, then the environmental inspector should determine whether it is a potentially “significant” find. For an “insignificant” find, such as a single debitage flake, no further reporting or actions are required. The environmental inspector’s daily report will document the find and its location (by milepost or station if available), and the environmental inspector will inform any governmental monitors and construction personnel that no further work is required. Suspended construction activities may continue after the determination of insignificance is made by the environmental inspector.

- 3) If any archeological sites or remains are determined to be “significant” or are discovered in an area which was not previously cleared for construction through Phase II or Phase III archeological investigations and subsequent approval from NY or CT SHPO, the environmental inspector will inform the construction manager and Iroquois’ Manager of Environmental Resources. A 36 CFR 800 certified archeologist will be consulted to review the discovery. Visual barriers such as snow fencing will be installed around the discovery area to protect it from further disturbance.

If an archeologist is not immediately available, and further work in the discovery area is not imminent, then photographs or drawings of the discovery may be mailed, delivered, or transmitted to the archeologist for review. The archeologist will determine if a visit to the area is required. If a site visit is needed, the archeologist must be on site within 36 hours after notification.

If on-site archeological investigations are required, Iroquois’ environmental inspector(s) will notify the construction manager. No work that could adversely affect the discovery area will be performed until the archeologist reviews the discovery and clears the site as insignificant.

The archeologist will determine, based on the artifacts or archeological materials discovered and based on the cultural sensitivity of the area in general, whether the discovery is potentially significant. If it is deemed potentially significant, Iroquois and the archeologist will consult and coordinate with the Federal Energy Regulatory Commission (FERC), SHPO, and other parties to propose procedures for treating and handling the discovery, while minimizing impacts to the construction schedule to the extent possible.

Suspended construction activities in the discovery area may not proceed until approval has been obtained from the FERC, SHPO and other involved agencies and parties, following completion of the agreed discovery-specific procedures.