

ATTACHMENT 7



February 27, 2008

Cynthia Blakemore
New York State Office of Parks, Recreation
And Historic Preservation
Peebles Island Resource Center
Delaware Avenue
Cohoes, New York 12047

**SUBJECT: Tri-Lakes Reliability Project
Phase IB Archaeological Investigation, Addendum No. 3
St. Lawrence County, New York
OPRHP Project Review Number 05PR04217**

Dear Ms. Blakemore:

The New York Power Authority ("Authority") proposes the Tri-Lakes Reliability Project ("Project") to address a critical need for upgraded electric distribution in the Tri-Lakes Region ("Region"), including the Towns of Colton, Parishville, and Piercefield in St. Lawrence County, New York. Pursuant to Section 14.09 of the New York State Historic Preservation Act ("Section 14.09") and Section 106 of the National Historic Preservation Act ("Section 106"), the Authority has initiated consultation with the New York State Historic Preservation Officer ("SHPO") to determine if historic properties will be affected by this undertaking. This letter represents consultation with the SHPO regarding the Phase IA/IB Archaeological Investigations, Addendum No.3 and the proposed construction along 12 miles (19 km) within the Route 56 Section of the Project.

Project Description

The Project will entail construction of a new, 46-kilovolt (kV) transmission line to provide additional electric distribution in the Region. Project construction will involve placing new wooden poles along a 75-foot (22.8-m) wide Right-of-Way ("ROW") at an interval distance of approximately 300 feet (91 m) to carry the new line. Prior to placing the poles, tall-growing trees along the ROW will be cut and removed. In most cases, the trees will be mechanically cut at the stump and then chipped at the site. In some areas (i.e. wetlands), the trees will be cut at the stump and the downed trunk will be cut (lopped) into smaller sections that will be left on-site. To prevent unnecessary disturbance to the existing road shoulder along New York State Routes 3 and 56, a trail traversing the length of the ROW will parallel the roadway and provide vehicle access to the pole locations during construction. There will be selected entrances from the Routes 3 and 56 roadways. In cross-country sections of the ROW, vehicle access will also be facilitated via a cleared trail. In either case, the access trail will not need any additional

preparation once the vegetation has been cleared, except for occasional side slopes or uneven areas which may require limited filling and isolated areas where grading may be required to make the trail passable. These sections are not expected to be widespread along the ROW, and will be determined in the field. Digging equipment will traverse the access trail and excavate 8 to 10 feet (2.4 to 3 m) below the ground surface at pole locations. Poles and additional hardware will be brought in along the access route, and the 70-foot (21-m) poles will be placed into the hole, leaving approximately 60 feet (18 m) above ground. Once the poles have been placed, the transmission conductors will be strung and energized. The final step will be site restoration of disturbed areas along the route, which will involve re-seeding, mulching, and correcting any drainage problems along disturbed portions of the ROW. The access trail will remain clear of standing trees for maintenance access, which will primarily consist of emergency repairs, structure inspections, and vegetation management activities.

In consultation with the SHPO, the Authority has defined the Area of Potential Effect ("APE") for this undertaking to include the 75-foot (22.8-m) wide ROW along the entire alignment of the Project. At present, this APE includes approximately 282 acres (114 ha).

Previous Cultural Resource Investigations

The Authority has previously conducted Phase IA and Phase IB cultural resource investigations and addendum studies for the Project. The SHPO has reviewed the results of these investigations, and has concurred with the Authority's determination that construction along the Northern Section of the Project will have no adverse effect on historic properties. In a letter dated January 4, 2008, the SHPO also noted no further concerns with construction along the Southern Section (between structures 287 and 505) of the Project, provided that the Authority implemented an Avoidance and Protection Plan and developed a long-term management plan (similar to a Historic Properties Management Plan) for identified archaeological sites along the Southern Section. Following SHPO's concurrence, the Authority and its partner for the Project, National Grid, have initiated construction along the Northern and Southern Sections of the Project. The Authority has also agreed consult further with the SHPO before initiating construction south of structure 505, in the vicinity of the proposed Piercefield Regulator Station.

Present Archaeological Investigation

In addition to the previously-tested sections of the Permitted Route, the Authority retained Hartgen Archaeological Associates, Inc. ("HAA, Inc.") of Albany, New York, to conduct Phase IA and Phase IB archaeological investigations along portions of the Route 56 Section of the Project. The Route 56 Section includes the Route 56 Alternative, the Western Alternative, and the Route 56 Bypass, portions of which were previously investigated. The attached report, entitled: *Phase IA/IB Archaeological Investigations, Addendum Report No. 3, Tri-Lakes Reliability Project, Phase IA/IB for the Route 56 Alternative and Western Alternative, Phase IB for the Route 56 Bypass, Town of Colton, St. Lawrence County, New York* was prepared by HAA, Inc. in February 2008, and presents the results of the addendum studies. The total APE for the Route 56 Section is

approximately 107 acres (43.3 ha), of which 73 (29.5 ha) acres were investigated for this report. The Phase IB investigations for the remaining 34 (13.8 ha) acres of the Route 56 Section were detailed in reports previously reviewed by the SHPO.

HAA, Inc. investigated a total of 749 shovel tests that were excavated within the Route 56 Section of the APE. A total of seven artifacts were encountered in scattered units during Phase IB testing. The artifacts were found in roadside shovel tests and are not considered significant. Based on the results of the Phase IB investigations, HAA, Inc. has recommended no additional archaeological investigations for the Route 56 Section of the Project.

Conclusions

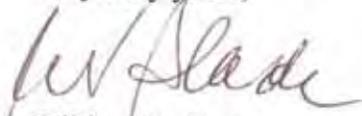
The entire Route 56 Section of the Project between the takeoff and reentry of the Bypass Section has been tested. The Authority is currently contemplating the use of the Route 56 Alternative and the Western Alternative to build the Project in addition to the already APA-permitted Route 56 Bypass portion. To this end, the Authority has reached a tentative agreement with the New York State Department of Environmental Protection to allow construction along the Route 56 Alternative through State Forest Preserve lands.

Based on the results of HAA, Inc.'s Phase IA/IB investigations, the Authority has tentatively concluded that construction along the Route 56 Alternative and the Western Alternative will not adversely affect historic properties listed in or eligible for inclusion in the State or National Registers of Historic Places. At this time, the Authority is seeking the SHPO's concurring determination that Project construction along the Route 56 Alternative and the Western Alternative will have no adverse effect.

The Authority may proceed with construction along the Route 56 Alternative and the Western Alternative portions of the Project within thirty (30) days from the date of your receipt of this letter if it receives no further comment from the SHPO. However, notwithstanding these provisions, the Authority prefers a written concurrence from the SHPO.

As always, the Authority welcomes the opportunity to discuss this matter with you further. Should you have any questions or concerns, please contact Ed Alkiewicz, the Authority's Manager of Environmental Studies and Remediation, at (914) 287-3247

Very truly yours,



William V. Slade
Agency Preservation Office

Encls.

New York Power Authority
Tri-Lakes Reliability Project
Page 4 of 4

cc: E. Alkiewicz (NYPA)
R. Quiggle (NYPA)
J. Suloway (NYPA)