

**Tri-State Montrose-Nucla-Cahone  
Transmission Line Improvement Project**

**Draft Plan of Development**

**Montrose, Ouray, San Miguel, and Dolores Counties, Colorado**

**Appendix C**

**Draft Cultural Resources and Protection Plan**

## Appendix C

### Draft Cultural Resources Protection and Management Plan

The objective of this Draft Cultural Resources Protection and Management Plan is to detail practices designed to address potential impacts from construction of the Tri-State Montrose-Nucla-Cahone Transmission Improvement Project (Project). Tri-State Generation and Transmission Association (Tri-State) has developed this plan as part of the Plan of Development (POD) that accompanies its application to the Bureau of Land Management (BLM) for a Right of Way (ROW) grant. If the ROW grant is approved, the final POD and all appendices will be attached to the Decision Record. This plan provides guidance to construction and field personnel on measures identified by Tri-State, BLM and US Forest Service (FS) to minimize effects during construction activities associated with the Project. It will be the responsibility of Tri-State and its project contractors, working with designated environmental inspectors, to comply with measures identified in this plan.

#### *Cultural Resources*

As part of the POD for the Project, Tri-State has retained a qualified cultural resource consultant (Alpine Archeological Consultants, Inc.) to perform cultural resource surveys of the right-of-way, access roads, and Temporary Use Areas (TUAs) (e.g., staging areas, stringing and pulling sites, and other work areas that will be used during construction). Cultural surveys were completed in 2004 on the 100-foot ROW and 50 feet was surveyed for access roads except on the San Juan Forest where 100 feet was surveyed on roads. In 2013 the additional ROW needed for the 230-kV transmission line and a small buffer (50 feet either side of existing 100-foot ROW) was surveyed along with 100 foot ROW for roads across the Tres Rios Bureau of Land Management managed lands.

Supplemental cultural resource inventory will be completed in 2015 and 2016 for additional TUAs, access roads, and any new ROW along alternatives. The BLM and FS have reviewed Alpine's 2013 cultural resource inventory report, and the Colorado State Historic Preservation Office (SHPO) has concurred with the federal agencies that 54 known cultural sites are eligible for inclusion to the National Register of Historic Places (NRHP). These cultural sites are identified as 'Sensitive Environmental Resources' and will be flagged for exclusion using 3-inch exclusionary ribbon for the duration of construction. A cultural resource specialist will monitor ground-disturbing activities within the boundaries of NRHP-eligible cultural sites. See Table C-1 below for additional mitigation measures.

This Cultural Resources Protection Plan includes:

- *A Memorandum of Agreement (MOA) regarding mitigation of adverse effects to NRHP-eligible cultural sites.* This document memorializes compliance with Section 106 of the National Historic Properties Act and must be executed by concurring parties (Tri-State, BLM, and FS) prior to issuance of any notice to proceed from the agencies.
- The Cultural Resource Treatment Plan (CRTP) will detail site-specific treatment measures for known sites outlined in the project MOA. The CRTP will be completed prior to construction.
- The Cultural Resource Monitoring and Discovery Plan (CRMDP) will describe the procedures for archaeological monitoring at NRHP-eligible sites and for unanticipated cultural resource discoveries made by construction personnel, Environmental Monitors, or archaeological monitors.

If a cultural resource is found during construction, the procedures outlined in the MOA and CRTP will be adhered to. *The MOA and Cultural Resources Treatment Plan* provides a reporting and communication

protocol for notifying the appropriate agencies about such cultural resource discoveries. The MOA will be included in the Final POD but confidential Treatment Plan will not be publicly available. A confidential POD Eligible Site Table lists cultural sites that must be avoided during construction and shows which sites will require archaeological monitoring during access road construction and/or pole removal. In the event that a cultural resource is encountered by construction personnel or by the Environmental Monitor during construction, the following actions will be taken:

The construction activity that resulted in the exposure of the discovery will be immediately halted, followed as soon as possible by the cessation of all other ground-disturbing activity within 300 feet of the discovery. After all construction activity within 300 feet of the discovery has been halted, the following steps will be taken to ensure that no further disturbance occurs to the discovery:

- Secure an area at least 30 feet in diameter around the discovery using orange safety fencing or a similar material (e.g., T-posts and flagging), as necessary.
- Redirect vehicle traffic around the area immediately surrounding the discovery.
- Remove vehicles and equipment already present in the area.
- Notify the appropriate land management agency and contact the Environmental Monitor, who will contact the Archaeological Monitor.
- Take appropriate measures to protect the discovery from further disturbance until an Archaeological Monitor has fully documented, evaluated, and completed treatment of the discovery.

In the event of the discovery of human remains, a similar procedure will be followed to ensure that the discovery is protected. The notification procedure for human remains will be different, however, than that required for other cultural resources. The procedure for treatment of human remains will be described in detail in the CRMDP.

### ***Environmental Protection Measures***

All project personnel working on the ROW will receive environmental training, including a briefing on the importance and identification of cultural resources. The following Environmental Protections Measures (EPMs) apply to cultural resources:

**Table C-1: Cultural Resource Environmental Protection Measures**

<b>Measure</b>	<b>Description</b>
CR-1	Prior to construction, all construction personnel will be instructed on the protection of cultural resources with reference to relevant laws and penalties and the requirements of the Cultural Resource Monitoring and Discovery Plan (CRMDP), and the need to cease work in the location if cultural resource items are discovered.
CR-2	Should any previously unknown historic/prehistoric sites or artifacts be encountered during construction, all land altering activities at that location will be immediately suspended and the discovery left intact until such time that the steps described in the CRMDP are carried out and the appropriate land management agency is notified and appropriate measures taken to assure compliance the National Historic Preservation Act and enabling legislation.
CR-3	Cultural Resources—Inadvertent Discovery: Pursuant to 43 CFR 10.4 (g); Tri-State will notify the authorized officer, by telephone with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4 (c) and (d), Tri-State will stop activities in the vicinity of the discovery and protect it until notified to proceed by the authorized officer.

<b>Measure</b>	<b>Description</b>
CR-4	Sensitive cultural resource locations (historic properties) in proximity to the ROW will be flagged prior to construction and major maintenance activities to ensure avoidance. A qualified and agency approved cultural resource monitor will be on site when construction activities are planned in proximity to cultural resources to ensure historic properties are not disturbed.
CR-5	Cultural resource inventories will be completed for areas that were not previously surveyed and the existing Treatment Plan will be appended to include newly documented areas of unavoidable disturbance to historic resources. The Memorandum of Agreement and agency approved appended Treatment Plan will be updated and implemented prior to the start of any construction activities.
CR-6	Tri-State and its contractors will comply with the Treatment Plan approved by the BLM, FS, and the State Historic Preservation Office (SHPO) to ensure unavoidable disturbance of cultural resources are properly mitigated.