



To: GMP Georgia Substation Project File

Date: February 10, 2026

Project #: 58901.02

From: Alexander Honsinger,
Archaeologist/Cultural Resources Specialist

Re: Summary of Archaeological Studies

Introduction

This memo has been prepared to summarize archaeological investigations completed by the Northeast Archaeology Research Center ("NEARC") for the Green Mountain Power ("GMP") Georgia Substation Upgrade Project, Georgia, Franklin County, Vermont ("the Project"). Investigations for the Project included an archaeological resource assessment ("ARA") in March 2024, a Phase I archaeological investigation completed in August 2025, and a letter providing analysis and commentary regarding the revision of Project plans in February 2026, each of NEARC's corresponding reports are attached, collectively comprising record of the archaeology review of this Project.

ARA [Attachment 1 (redacted)]

The NEARC's (2024) *Archaeological Resource Assessment of the Proposed Green Mountain Power Georgia Substation Project* entailed the analysis of the approximately 1.47-acre (ac) area-of-potential-effect ("APE") inclusive of ground disturbing activities in order to identify archaeological sensitivity for Native American and/or historic Euroamerican archaeological resources. One archaeologically sensitive area ("ASA") was identified during the ARA study consisting of a glaciofluvial outwash fan landform associated with the former shoreline of the Champlain Sea deemed sensitive for pre-Contact Native American archaeological resources and nineteenth century Euroamerican activities associated with nearby Ballard Road.

Phase I End-of-Field ("EOF") Letter (Attachment 2)

The NEARC's (2025) Phase I archaeological investigation included systematic subsurface shovel testing along seven linear transects throughout archaeologically sensitive portions of the APE. A total of 20 square 50 x 50-centimeter shovel test pits (or "STPs") were excavated throughout the ASA. No Native American or significant Euroamerican archaeological resources were identified during the Phase I Investigation, and as a result, NEARC issued a finding of *no adverse effect* on significant archaeological sites (*i.e.*, eligible for listing on the Vermont State/National Register of Historic Places) and did not recommend any further archaeological work for the Project. The Vermont Division for Historic Preservation ("VDHP") concurred with NEARC's No Adverse Effect findings for the Project on October 5, 2025.

February 2026 Letter (Attachment 3)

Following a review of the July 2025 revisions to the Project plans, NEARC (2026) concluded that the expansion of the temporary substation into portions of the ASA would have *no adverse effect* on significant archaeological sites and did not recommend any further archaeological work for the Project revisions. This finding is based upon the results of the August 2025 Phase I archaeological field investigations for the Project which focused excavations within areas of the highest archaeological sensitivity within the APE (*i.e.*, elevated and level topography) and that no archaeological resources were identified.

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**Archaeological Resource Assessment of the Proposed
Green Mountain Power Georgia Substation Project
Franklin County, Vermont**

Northeast Archaeology Research Center, Inc.

March 20, 2024

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Introduction

The Northeast Archaeology Research Center, Inc. (NE ARC) has completed an Archaeological Resource Assessment (ARA) of the proposed Green Mountain Power (GMP) Georgia Substation Upgrade Project (Figures 1 and 2). The work was undertaken on behalf of GMP to meet Vermont Public Utility Commission Section 248 regulatory requirements and meets guidelines determined by the Vermont Division for Historic Preservation (VDHP) (VTSHPO 2017).

The Project is an upgrade of an existing substation at 2066 Ballard Road, Georgia, Franklin County, Vermont. The substation upgrades will include a new substation and associated line and structure replacement work, plus placement of a temporary substation. All work will occur within an overall area totaling approximately 1.47 acres, with line and structure replacement work and placement of an access road occurring in an area extending about 114 m (374 ft) upslope to the east of the existing substation (Figure 3).

The goal of the ARA was to identify all areas within the Area of Potential Effect (APE) of the Project that are sensitive for Native American and/or historic Euroamerican archaeological sites, or to show that archaeological resources of potential significance are unlikely to be present. Significant archaeological sites are those that meet eligibility criteria for listing in the State and National Registers of Historic Places (NRHP). The ARA included background research, sensitivity modeling and a field inspection.

The eastern portion of the Project area includes a minimally disturbed landform that is considered archaeologically sensitive. Archaeological phase I survey is recommended for any locations of ground disturbance within this defined archaeologically sensitive area (ASA). The goal of archaeological phase I survey is to determine if archaeological sites of potential significance are present, and to determine potential Project effects on archaeological deposits if identified.

Environmental Setting

The Project area straddles the boundary between the Lamoille River and Lake Champlain Direct drainage basins (Figure 4). The Lake Champlain Direct basin consists of a number of short streams that run directly into Lake Champlain rather than into any of the larger rivers of the region. The closest of these named streams is Stone Bridge Brook, located about 1.9 km (1.18 mi) to the south of the substation, and flowing generally westwards into Lake Champlain. A small, unnamed tributary of Stone Bridge brook runs east-to-west approximately 100 m south of the existing substation and passes through a culvert beneath Ballard Road. Just under 1 km to the northeast of the substation is another unnamed stream; this one flowing eastwards to become a tributary of the Lamoille River, entering Arrowhead Mountain Lake about 4.3 km southeast of the Project, and hence positioning the Project in the area of a drainage divide.

The Project is situated within the northern portion of the Champlain Lowlands physiographic zone, the dominant physical feature in Vermont (Stewart and MacClintock 1969) (Figure 5). The Vermont portion of the Champlain Lowlands is bounded on the east by the Green Mountains and by Lake Champlain and the Adirondack Mountains of New York State on the west. The Champlain Lowlands have been generally characterized as low and gently rolling, with broad hills, glacial lakeshore terraces and fossil delta plains (Howland 1974). The Project occupies a gently rolling terrain north of the Lamoille River and west of U.S. Interstate 89. The existing substation is located at an elevation of approximately 126 m (416 ft) above mean sea level (a.m.s.l.) and the topography rises gradually up to 133 m (436 ft) at the eastern extent of the parcel.

The Project area lies on the shoreline of the former Champlain Sea but well within the former glacial Lake Vermont (Figure 6). The NRCS soil designations for the area indicate that a small outwash fan formed where the shoreline met the glacial lake, leaving behind glaciofluvial and outwash deposits which extend into the area of the Project from the west (Figure 7). These glaciofluvial sediments include Au Gres and Deerfield soils (mainly within the footprint of the existing substation) and Lordstown rocky loam (mainly in the area of the existing poles to the east); two of these soil types, Deerfield and Lordstown, are moderately well to well drained (USDA 2024).

Recorded Precontact Native American Sites and General Archaeological Sensitivity

Review of the *Vermont Archaeological Site Inventory* (VAI) indicates there are 18 Precontact Native American sites documented within 5.0 km of the Project. Those located within approximately 1.6 km of the project are shown in Figure 8. Two closely associated Native American archaeological sites are recorded in the *Vermont Archaeological Site Inventory* both located less than 1.0 km west of the Project

area in what appears to be a similar setting to the Project area on a rise or knoll above an unnamed tributary of Stone Bridge Brook. The sites are designated VT-FR-0355 and VT-FR-0372, and both are of undetermined age. Site VT-FR-0355 is comprised of a single milky quartz flake and VT-FR-0372 is comprised of two chert flakes.

South of the Project area, there are 14 previously recorded Native American sites mapped within 5.0 km. Many of these sites were located via surface collection and generally consisted of lithic debitage and artifacts that are not temporally diagnostic. The majority of the sites are focused on landforms associated with Stone Bridge Brook, the Lamoille River, and around Arrowhead Mountain Lake. Of the sites that did produce temporally diagnostic materials, one can be dated to the Paleoindian period, four can be dated to the Archaic period (Late and Early), and two can be dated to the Late to Middle Woodland period. Site VT-FR-0060 and VT-FR-0289 are the closest dated sites to the Project area, both being approximately 2 km south of the Project: VT-FR-0060 was identified by a private collector before 1979 and noted it as a “small camp site of West Georgia” where it was reported that celts (potentially of Late Archaic date) were found along with a scatter of artifacts on the sand plains near the mouth of the Lamoille River in both Colchester and Milton (VDHP ORC 2024). VT-FR-0289, also known as the Morse Site, was identified in 1994 by Archaeology Consulting Team, and can be dated to the Late-Middle Woodland period based on the recovery of a triangular projectile point, similar to those of Levanna and Madison point style, along with a groundstone fragment, and seven pieces of lithic debitage, consisting of primarily chert with one quartzite flake (VDHP ORC 2024).

North of the Project area, VT-FR-0368 is located approximately 3.9 km north of the Project and consists of two activity loci on either side of Polly Hubbard Rd near Mill River. This site is dated to the later Woodland period based on the recovery of various Levanna projectile points made of both quartzite (7) and chert (2) along with a hearth feature that was carbon-dated to 1290-1420 A.D.; a potential living surface was also identified. Along with the features, a total of four hammerstones, five scrapers (two quartzite, one granite, one smoky quartz, and one chert) and three large chopping implements were also recovered from the site (VDHP ORC 2024).

The VDHP *Environmental Predictive Model for Locating Precontact Archaeological Sites* was used to assist in determining archaeological sensitivity for the Project (Figure 9). The level and intact landform located within the Project area scores up to 50 points and would be considered quite highly archaeologically sensitive for the presence of Precontact sites, given the general Project location on a glacial outwash landform at the margin of former glacial Champlain Sea. Proximity to an intermittent drainage adds to the general sensitivity of the area. As detailed below, the field inspection identified only

one restricted area that is both level and potentially intact, and which would thus score 50: this area has been designated as an archaeologically sensitive area (ASA). Outside of this ASA, the presence of substantial prior disturbance in the area of the existing substation negates sensitivity in most parts of the Project area.

Postcontact Archaeological Context and Sensitivity

Review of nineteenth century maps including the Walling (1857) and Beers (1871) atlases. These show that the general alignment of Ballard Road is present at least by 1857 and indicate a residence directly south of the Project area on the Walling (1857) atlas, with the name H. Ballard. There is also another residence noted west of the Project, on the opposite side of Ballard Road with the name O. Ballard. However, H. Ballard does not show up on the 1871 Beers map (Figures 10-11). The closest historic settlement appears to have been roughly 1.7 km (1.1 mi) to the north at the intersection of modern Ballard Road and Carpenter Hill Road at the heart of the town of Georgia, where several residences and a Methodist church appear in 1857, with additional mills and residences in 1871. By 1871, the area around Ballard Road, leading up to Georgia, was considered the Ballard District and included various residences along with a school and a mineral spring mapped within the district. Also of note is the Vermont Central Railroad, running north-south and located roughly 2.3 km (1.4 mi) to the east of the Project area.

The closest recorded Euroamerican sites are VT-FR-246 and 247, located approximately 3.7 km (2.3 mi) west of the Project area, which includes foundation stones, a retaining wall, and a well. The foundation is thought to be that of either Henry H. Gordon, built between 1863 and 1871 or S. Clark which appears in the same location on the 1857 Walling map. Other Euroamerican sites within 5 km of the Project include railroad pylons, stone foundations and artifact scatters associated with nineteenth century residences (VT-FR-0187, VT-FR-0188), approximately 4.6 km southeast of the Project area.

Historic maps suggest that this general area of Georgia was relatively well populated in the 19th century, however no structures were present within the actual Project APE. The Project is considered to have a low sensitivity for the presence of Euroamerican archaeological resources, such as evidence of general agricultural activity and domestic refuse disposal in the neighborhood.

Field Inspection and Determination of Archaeological Sensitivity

NE ARC Field Supervisor Milo Glover conducted a field inspection of the Project on August 31, 2023. The substation and gravel access road are accessed off Ballard Road. The existing substation is situated on a small rise within a grassy field (Figure 12). The landscape in the western portion of the Project

area has been slightly modified by the construction of the existing substation, including a level area immediately north of the substation. However the landform rises naturally to the east (Figures 13 and 14). The transmission line runs generally north-south directly east of the substation on the aforementioned rise of the landform (Figures 15 and 16). There are small, unnamed tributaries of both Stone Bridge Brook and Mill River just west of the existing substation, on the opposite side of Ballard Road, along with an intermittent drainage cut alongside Ballard Road. There is an existing farm road that runs directly between the existing substation and the transmission line and then runs under the transmission line just north of the pole that is to be replaced within the Project area (Figures 17 and 18). There is also a recently constructed battery energy storage system (BESS) facility located to the southeast of the existing substation (Figures 19 and 20; see Figure 3).

The elevated, level area in the eastern portion of the Project area seems to be largely intact and of natural formation (see Figures 19 and 20). This landform is mapped as glaciofluvial outwash deposits and is likely a portion of a former outwash fan located along the former shoreline of glacial Champlain Sea. This area is defined as archaeologically sensitive (see Figure 3).

Of note, portions of this elevated landform were archaeologically investigated in compliance with Section 248 requirements in advance of construction of the adjacent Strata Storage, LLC BESS facility, which is located southeast of the existing substation and southwest of the ASA. This previous work included a Historic Resources Assessment undertaken by VHB, and an ARA and phase I survey undertaken by the University of Vermont Consulting Archaeology Program. While the location of the BESS facility was determined to be archaeologically sensitive, no archaeological deposits were identified during the testing (VDHP ORC 2024).

The remainder of the Project area appears to have been modified by previous construction, and no other areas of archaeological sensitivity were defined for the Project.

Conclusions and Recommendations

NE ARC has completed an Archaeological Resource Assessment for the proposed GMP Georgia Substation Project as part of the Public Utility Commission Section 248 review process. A portion of the Project APE has sensitivity for the presence of Precontact archaeological sites given the presence of a level landform overlooking a nearby drainage. This landform appears minimally modified and appears to be a remnant portion of an outwash fan associated with the former shoreline of the glacial Champlain Sea, and was defined as an archaeologically sensitive area (ASA). No historic structures were mapped within the

Project area but the general 19th century activity along Ballard Road suggests there is some potential to identify archaeological deposits associated with this historic activity.

Two existing GMP structures are located within the ASA. Current plans indicate that GMP propose to replace the easternmost existing pole with two new structures in close proximity to the original pole location, and to access this area via a trackway extending east from the substation, upslope towards an existing farm track. Archaeological phase I survey is recommended for any locations of proposed ground disturbance within the ASA. The goal of archaeological phase I survey is to determine if archaeological sites of potential significance are present, and to determine potential project effects on archaeological deposits if identified. Significant archaeological sites are those that meet eligibility criteria for listing in the State and National Registers of Historic Places (NRHP).

References

Beers, F.W.

1871 *Atlas of Franklin and Grand Isle Counties, Vermont*. Charles E. Tuttle Company, Rutland.

Howland, W.G.

1974 *Vermont Land Capability*. Vermont State Planning Office, Montpelier.

Stewart, D., and P. MacClintock

1969 *The Surficial Geology and Pleistocene History of Vermont*. Vermont Geological Survey Bulletin 31, Montpelier.

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2024 Web Soil Survey. Electronic Source, <http://websoilsurvey.nrcs.usda.gov>. Accessed 2024.

VTSHPO

2017 *The Vermont State Historic Preservation Office's Guidelines for Conducting Archaeology In Vermont and Appendices*. Vermont State Historic Preservation Office, Montpelier, VT.

Walling, H.F.

1857 *Map of the Counties of Franklin and Grand Isle, Vermont*. Baker, Tilden & Company, Boston, New York.

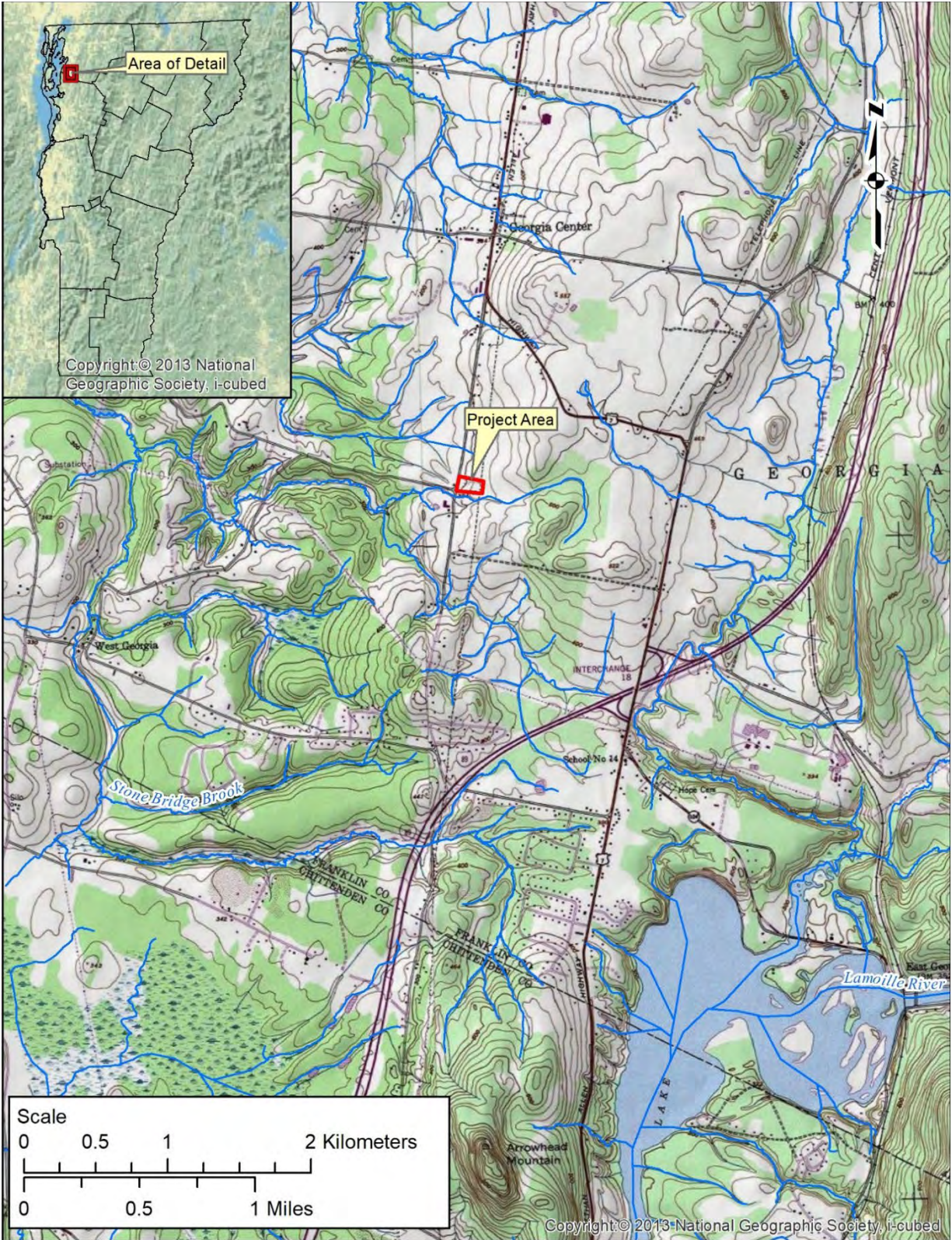


Figure 1. USGS Topographic map showing the location of the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.

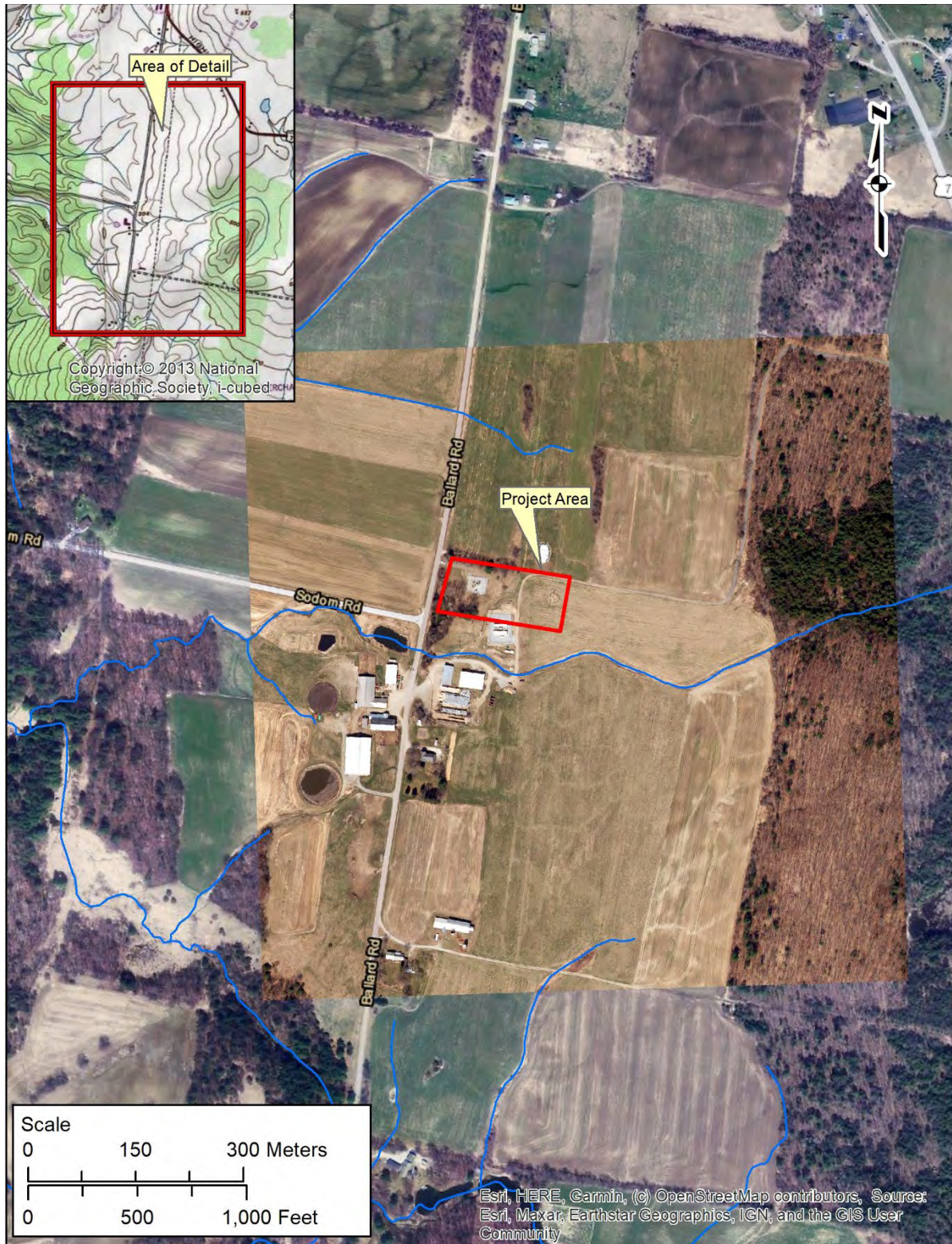


Figure 2. Aerial photograph showing the location of the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note location of identified Archaeologically Sensitive Area.

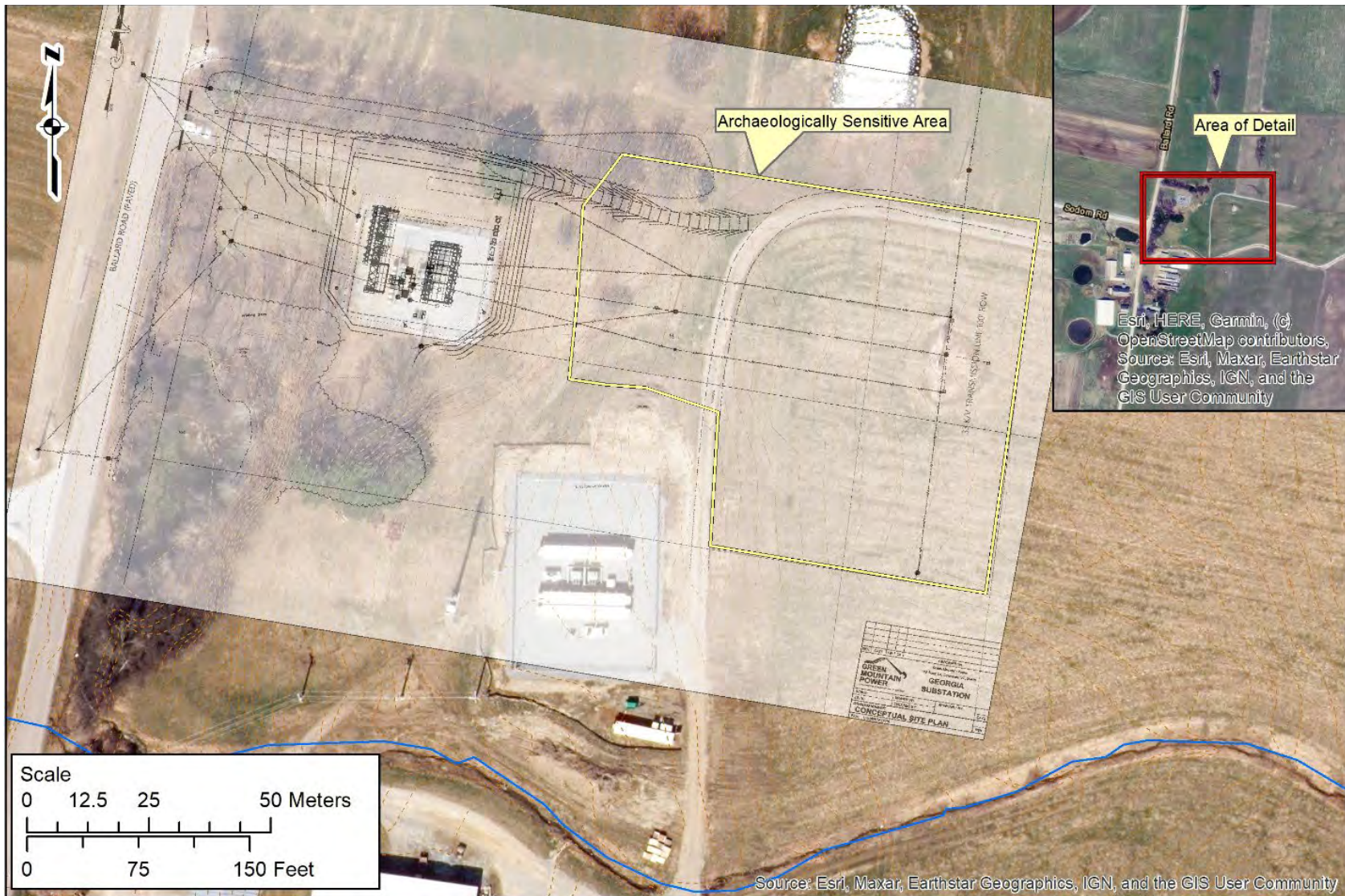


Figure 3. Project plans for the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note location of identified Archaeologically Sensitive Area. Also note the location of the VHB Strata BESS station to the south.

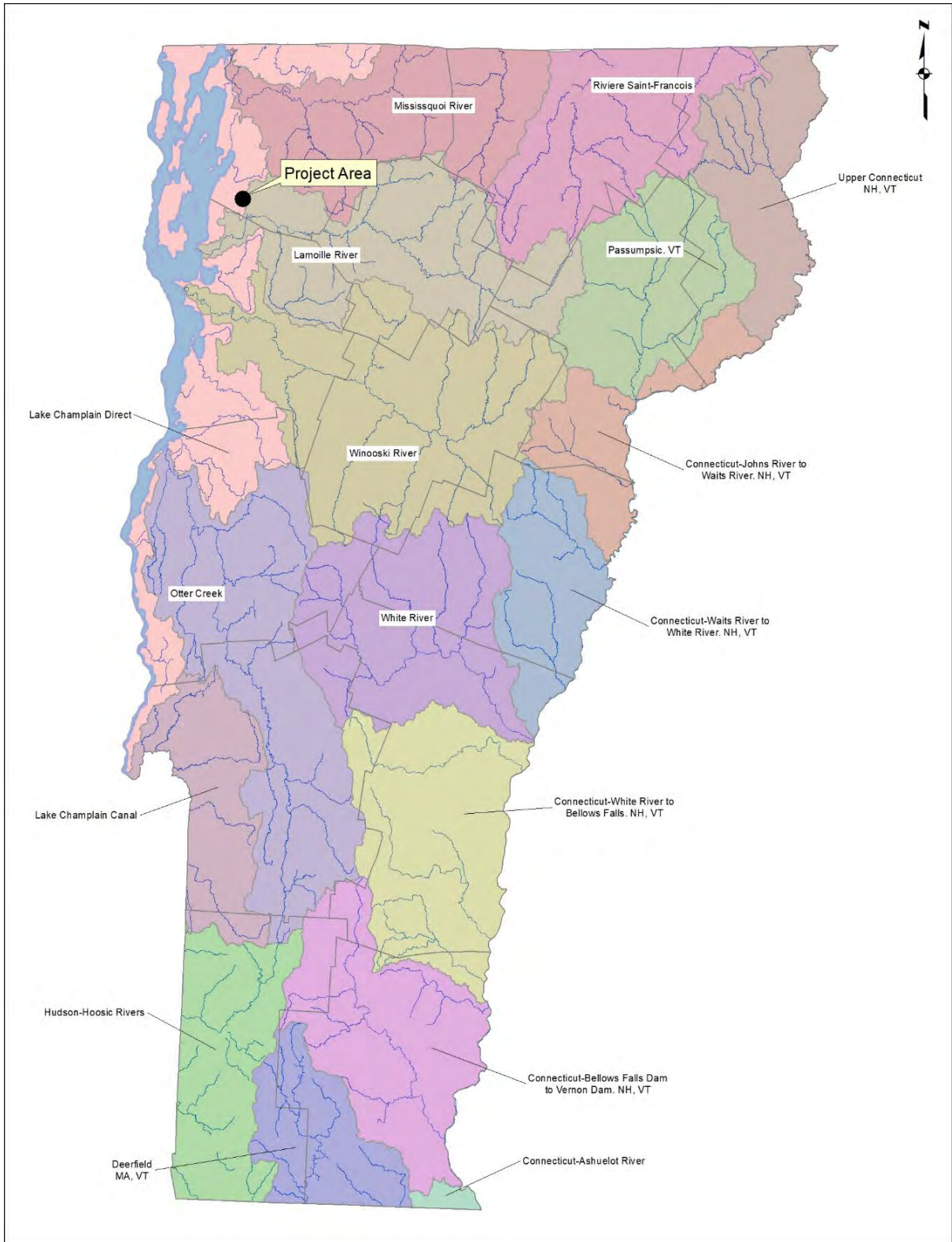


Figure 4. Drainage map showing the general location of the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.

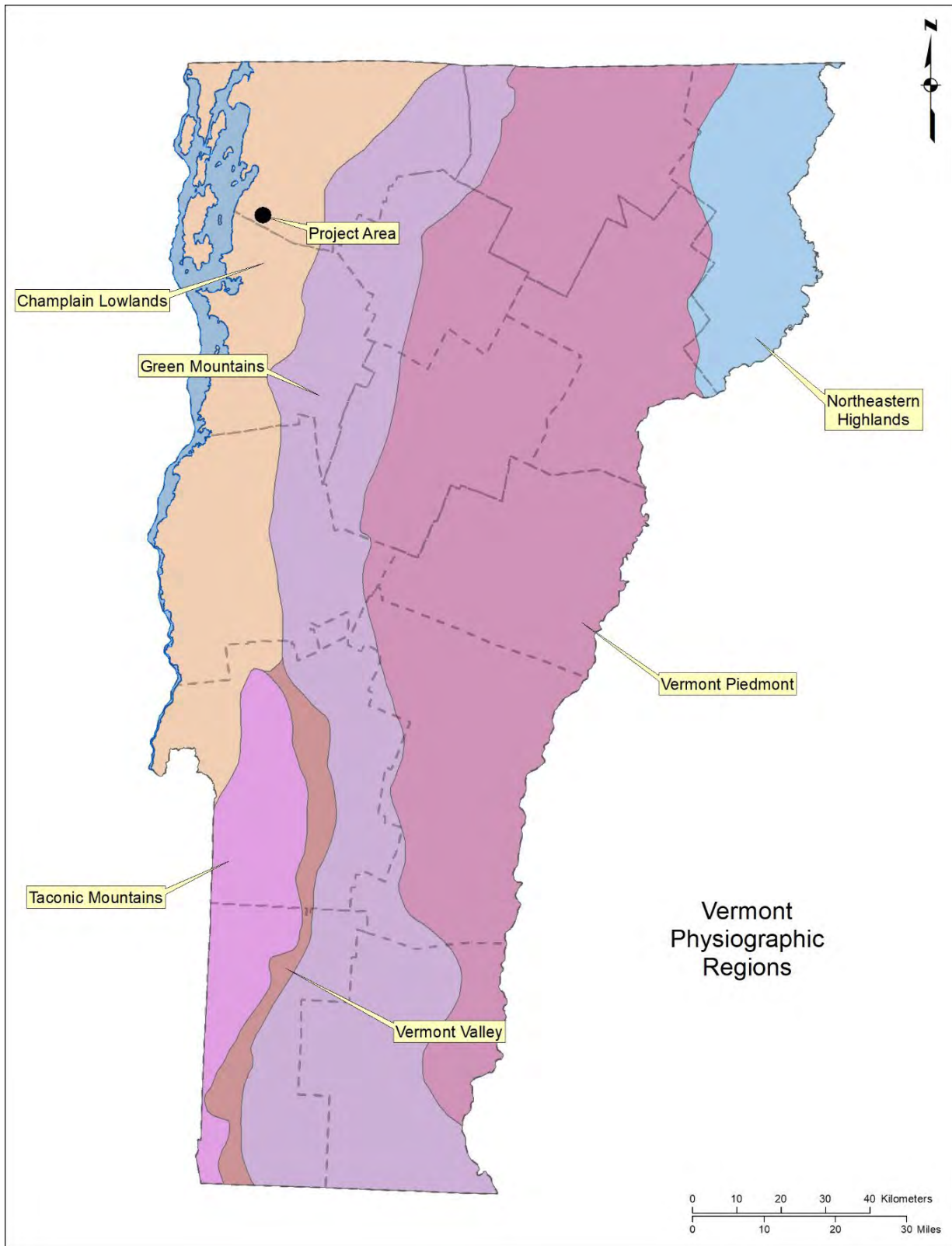


Figure 5. Map of the physiographic regions of Vermont showing the general location of the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont within the Champlain Lowlands.

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Figure 6. Vermont Archaeological Inventory map with glacial Champlain Sea in the general location of the Green Mountain Power Georgia Substation, Franklin County, Vermont. Note location of Project area along former shoreline of the glacial Champlain Sea.

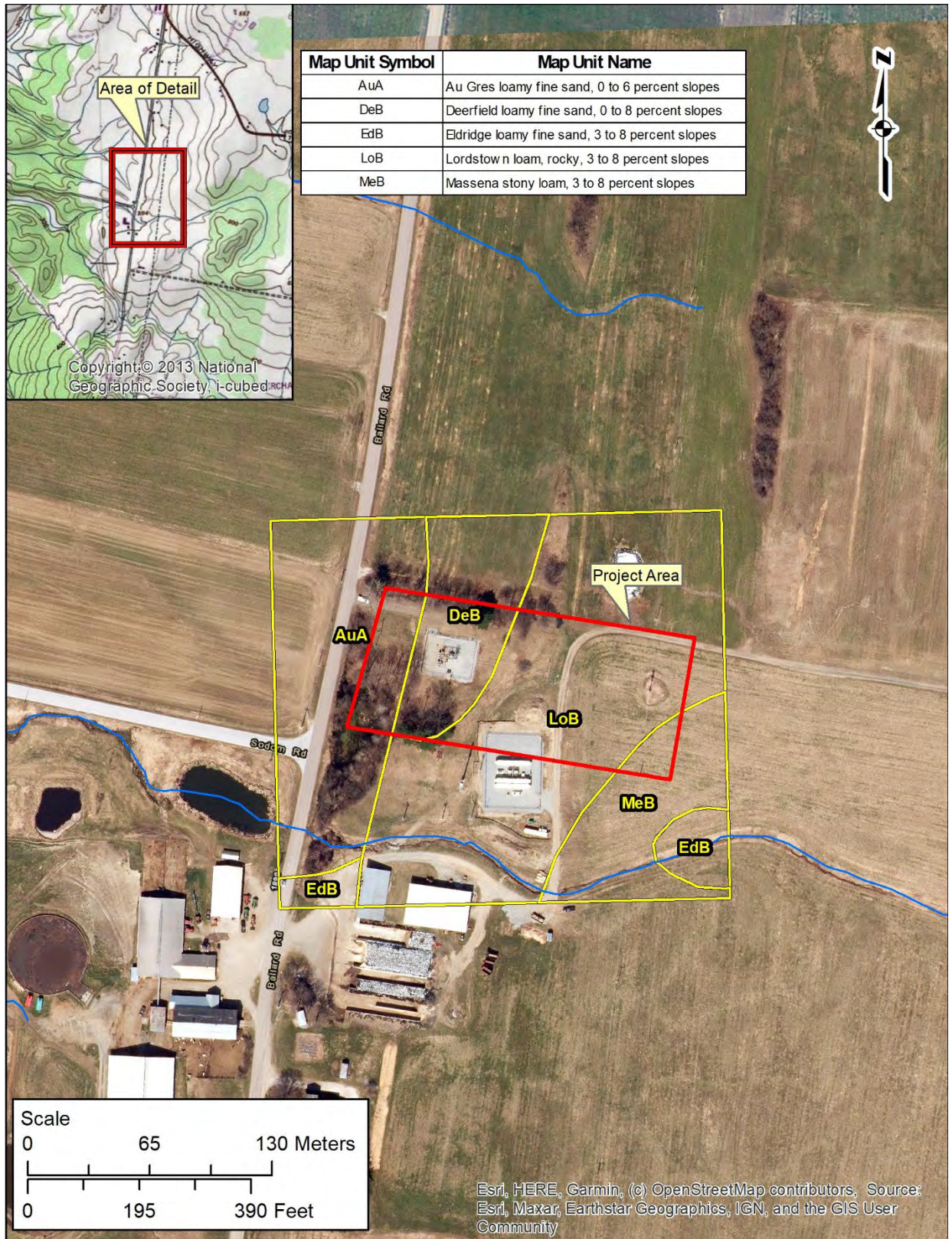


Figure 7. Aerial photograph showing mapped soil types for the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.

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Figure 8. Vermont Archaeological Inventory map showing previously identified sites surrounding the Green Mountain Power Georgia Substation, Franklin County, Vermont. Note that only sites within approximately 1.6 km (1 mi) of the Project area are visible.

VERMONT DIVISION FOR HISTORIC PRESERVATION
Environmental Predictive Model for Locating Pre-contact Archaeological Sites

GMP Georgia Substation Upgrade Project

Project Name
DHP No.

Map No.

County Franklin
Staff Init. MTG

Town Georgia
Date 08/31/2023

Additional Information

Environmental Variable	Proximity	Value	Assigned Score
A. RIVERS and STREAMS (EXISTING or RELICT):			
1) Distance to River or Permanent Stream (measured from top of bank)	0- 90 m	12	6
	90- 180 m	6	
2) Distance to Intermittent Stream	0- 90 m	8	
	90-180 m	4	
3) Confluence of River/River or River/Stream	0-90 m	12	
	90 –180 m	6	
4) Confluence of Intermittent Streams	0 – 90 m	8	
	90 – 180 m	4	
5) Falls or Rapids	0 – 90 m	8	
	90 – 180 m	4	
6) Head of Draw	0 – 90 m	8	
	90 – 180 m	4	
7) Major Floodplain/Alluvial Terrace		32	
8) Knoll or swamp island		32	
9) Stable Riverine Island		32	
B. LAKES and PONDS (EXISTING or RELICT):			
10) Distance to Pond or Lake	0- 90 m	12	
	90 -180 m	6	
11) Confluence of River or Stream	0-90 m	12	
	90 –180 m	6	
12) Lake Cove/Peninsula/Head of Bay		12	
C. WETLANDS:			
13) Distance to Wetland (wetland > one acre in size)	0- 90 m	12	
	90 -180 m	6	
14) Knoll or swamp island		32	
D. VALLEY EDGE and GLACIAL LAND FORMS:			
15) High elevated landform such as Knoll Top/Ridge Crest/ Promontory		12	12
16) Valley edge features such as Kame/Outwash Terrace**		12	

Figure 9. Vermont Division for Historic Preservation Environmental Predictive Model for Locating Precontact Archaeological Sites in Vermont for the proposed GMP Georgia Substation Upgrade Project, Franklin County, Vermont.

17) Marine/Lake Delta Complex**		12	
18) Champlain Sea or Glacial Lake Shore Line**		32	32
E. OTHER ENVIRONMENTAL FACTORS:			
19) Caves /Rockshelters		32	
20) <input type="checkbox"/> Natural Travel Corridor <input type="checkbox"/> Sole or important access to another drainage <input type="checkbox"/> Drainage divide		12	
21) Existing or Relict Spring	0 – 90 m 90 – 180 m	8 4	
22) Potential or Apparent Prehistoric Quarry for stone procurement	0 – 180 m	32	
23)) Special Environmental or Natural Area, such as Milton aquifer, mountain top, etc. (these may be historic or prehistoric sacred or traditional site locations and prehistoric site types as well)		32	
F. OTHER HIGH SENSITIVITY FACTORS:			
24) High Likelihood of Burials		32	
25) High Recorded Site Density		32	
26) High likelihood of containing significant site based on recorded or archival data or oral tradition		32	
G. NEGATIVE FACTORS:			
27) Excessive Slope (>15%) or Steep Erosional Slope (>20)		- 32	
28) Previously disturbed land as evaluated by a qualified archeological professional or engineer based on coring, earlier as-built plans, or obvious surface evidence (such as a gravel pit)		- 32	
** refer to 1970 Surficial Geological Map of Vermont			
			Total Score: 50
Other Comments :			
0- 31 = Archeologically Non- Sensitive 32+ = Archeologically Sensitive			

Figure 9. Continued.

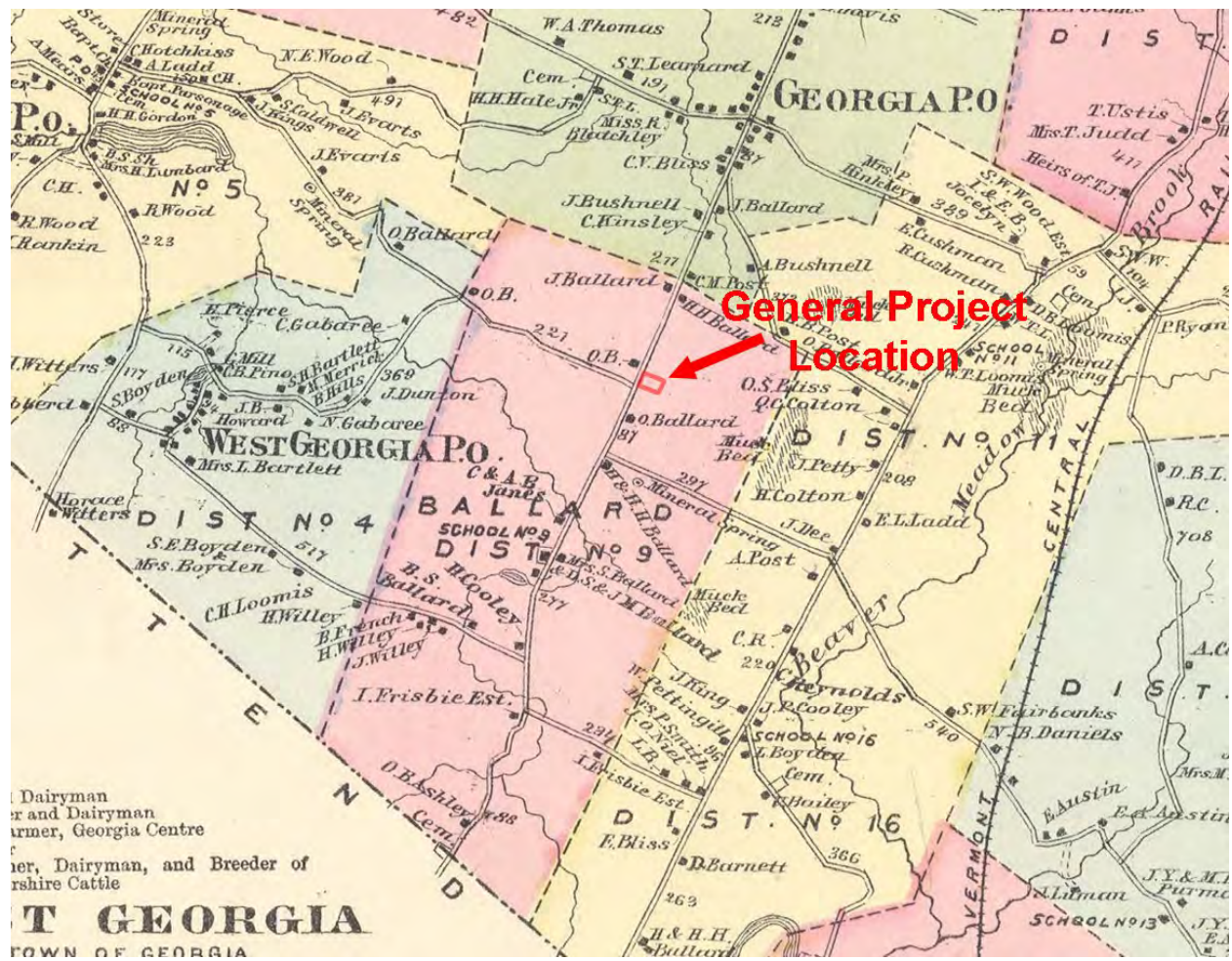


Figure 11. 1871 Beers map showing the general location of the GMP Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 12. View east of the access gate and existing Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 13. View east of the existing Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note slope at rear of substation and artificially levelled area to north of substation (left of photograph).



Figure 14. View west of the existing Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 15. View west of the existing Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 16. View south of transmission line running east of existing Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 17. View east of transmission line structure to be replaced as part of the Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note farm road that cuts through area.



Figure 18. View northeast showing the transmission line running east of the existing Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 19. View southwest from the level landform looking toward the existing Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note elevation difference between field and substation. Also note the newly constructed BESS facility to the center left of the image.



Figure 20. View southwest of the existing Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note gradual slope west towards substation. Also note the newly constructed BESS facility to the left of the image.

Northeast Archaeology Research Center, Inc.

Scott Lehman
Green Mountain Power
2152 Post Road
Rutland, VT 05701



August 25, 2025

RE: Archaeological Phase I Survey of the Green Mountain Power Georgia Substation Upgrade Project, Georgia, Franklin County, Vermont

Dear Scott,

We write to inform you of the completion of the archaeological phase I survey fieldwork for the proposed Green Mountain Power (GMP) Georgia Substation Upgrade Project located in Georgia, Franklin County, Vermont (Figures 1 and 2). The Northeast Archaeology Research Center, Inc. (NE ARC) completed this work at the request of GMP between August 10 and August 11, 2025 as part of the Vermont Public Utility Commission Section 248 review process. Guidelines determined by the Vermont Division for Historic Preservation (VDHP) are also germane (VTSHPO 2017).

GMP is planning substation upgrades, including a new substation and associated line and structure replacement work, placement of a temporary substation, and access. All work will occur within an overall area totaling approximately 1.47 acres, with line and structure replacement work occurring in an area extending about 114 m (374 ft) upslope to the east of the existing substation (Figure 3). The archaeological sensitivity of the Project area was confirmed during an archaeological resource assessment undertaken by NE ARC in 2023, which included a field inspection and background research (Northeast Archaeology Research Center, Inc. 2024). This assessment determined that the eastern portion of the Project area includes a minimally disturbed landform which is considered archaeologically sensitive (see Figure 3). Sensitivity is based on the presence of an elevated, level, and apparently intact landform above an unnamed tributary of Stone Bridge Brook, in a similar setting to other nearby known precontact sites. This landform is mapped as glaciofluvial outwash deposits and is likely a portion of a former outwash fan located along the former shoreline of glacial Champlain Sea. The Project area was considered to have low historic archaeological sensitivity based on the results of a historic map review, which found no structures located within or in close proximity to the Project area.

The Phase I survey was designed to identify all archaeological sites, Native American or historic Euroamerican, that may be present within the Project area of potential effect (APE) or to establish that it is unlikely that site(s) are present, and to provide preliminary information necessary for both long- and short-term management of archaeological resources as appropriate. As detailed below, the archaeological testing indicated that there are no significant intact archaeological deposits related to any pre-contact or historic Euroamerican occupation within the Project area, and no further archaeological work is recommended prior to project construction.

Fieldwork and Results

NE ARC undertook the phase I fieldwork between August 10 and 11, 2025. A total of 20 0.5 x 0.5 m test pits were completed along seven linear transects, for a total excavation of 5.0 sq m (Figures 4-9). Transects were positioned to focus testing on areas of Project effects (see Figure 4). Test pits reached depths of between 17 and 60 cm below surface, and an average of 41 cm. The stratigraphy across the Project area was generally consistent, with an organic 'Ap' horizon of brown sandy loam overlaying a basal 'C' horizon of compact, yellow-brown sandy clay. An intermediate 'B' horizon was noted in two test pits, and two test pits along Transect 4 terminated on ledge immediately below the 'Ap'. These sediment profiles generally corroborate the USDA mapped soils for the area as Au Gres and Deerfield soils and Lordstown rocky loam, which are glaciofluvial and outwash deposits (USDA 2024). Sample stratigraphic profiles are included in Appendix I.

The only cultural material recovered includes two small fragments of unidentified white ceramic and a single fragment from a molded glass vessel, all from the 'Ap' plow zone within a single test pit (T5 P2) located adjacent to the extant substation. Given the fragmentary nature and limited quantity of artifacts, and location of this test pit in proximity to the substation and also in proximity to Ballard Road, it is considered highly unlikely that these are related to any form of historical occupation, particularly given the lack of any identified structures in this location on historic maps. It is likely that this cultural material is part of a general plow scatter commonly identified in agricultural fields in the region.

Conclusions and Recommendations

Archaeological phase I survey has been completed for the proposed GMP Georgia Substation Upgrade Project as part of the Vermont Public Utility Commission Section 248 regulatory requirements. No Native American or significant Euroamerican artifacts were recovered. The results of the phase I survey indicate that the Project as planned is unlikely to have an adverse effect on significant, i.e., State or National Register of Historic Places eligible archaeological sites, and no additional archeological work is recommended prior to Project construction. Please let us know if you have any questions or comments and thank you for the opportunity to conduct this study.

Sincerely,



Arthur R. Clausnitzer, Jr., Ph.D.
Historical Archaeologist, NE ARC, Inc.



Gemma-Jayne Hudgell, Ph.D.
Director, NE ARC, Inc.

References Cited

Northeast Archaeology Research Center, Inc.

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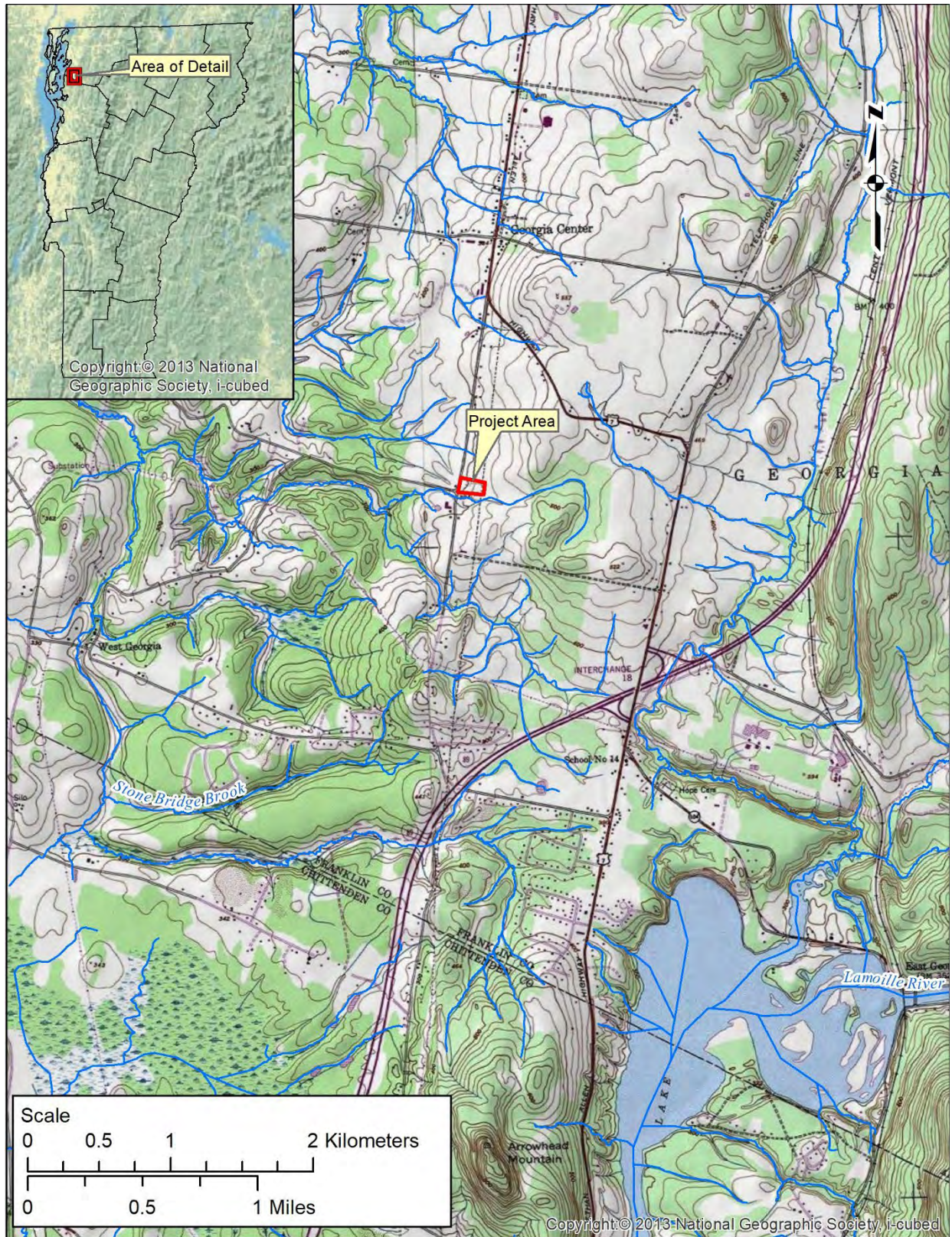


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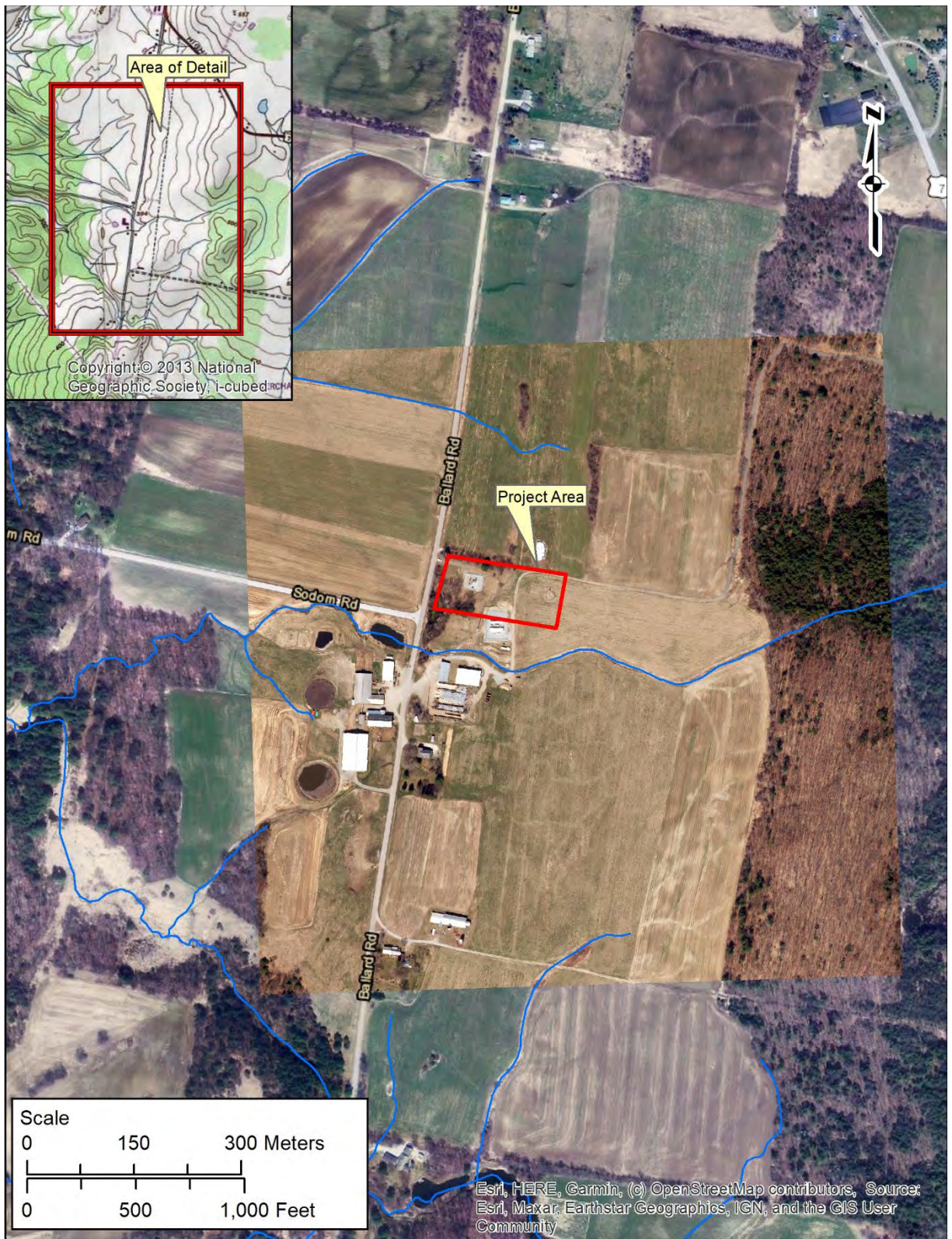


Figure 2. Aerial photograph showing the location of the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.

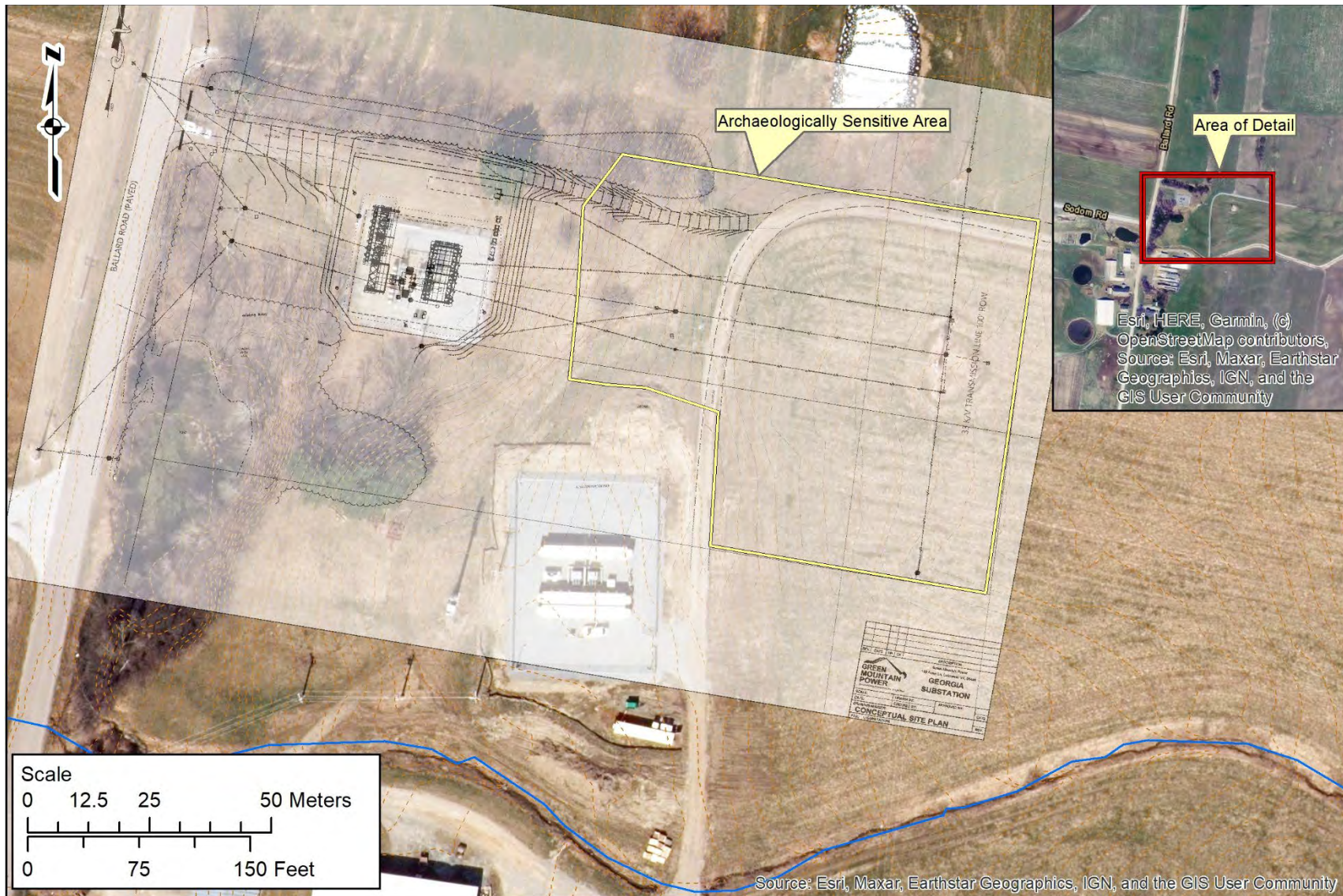


Figure 3. Project plans for the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note location of identified Archaeologically Sensitive Area.

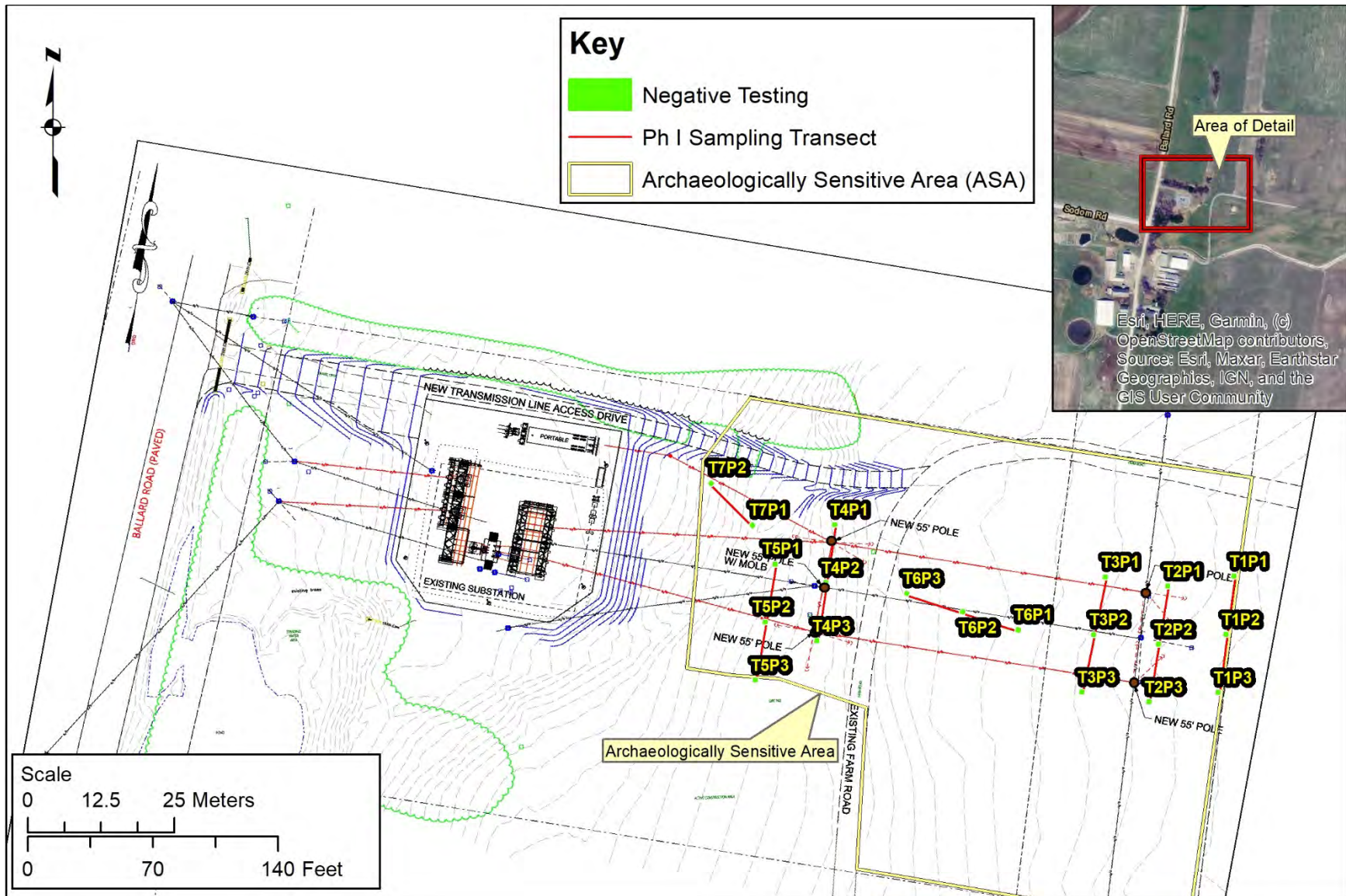


Figure 4. Project plans showing the location of archaeological phase I survey transects and test pits within the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.

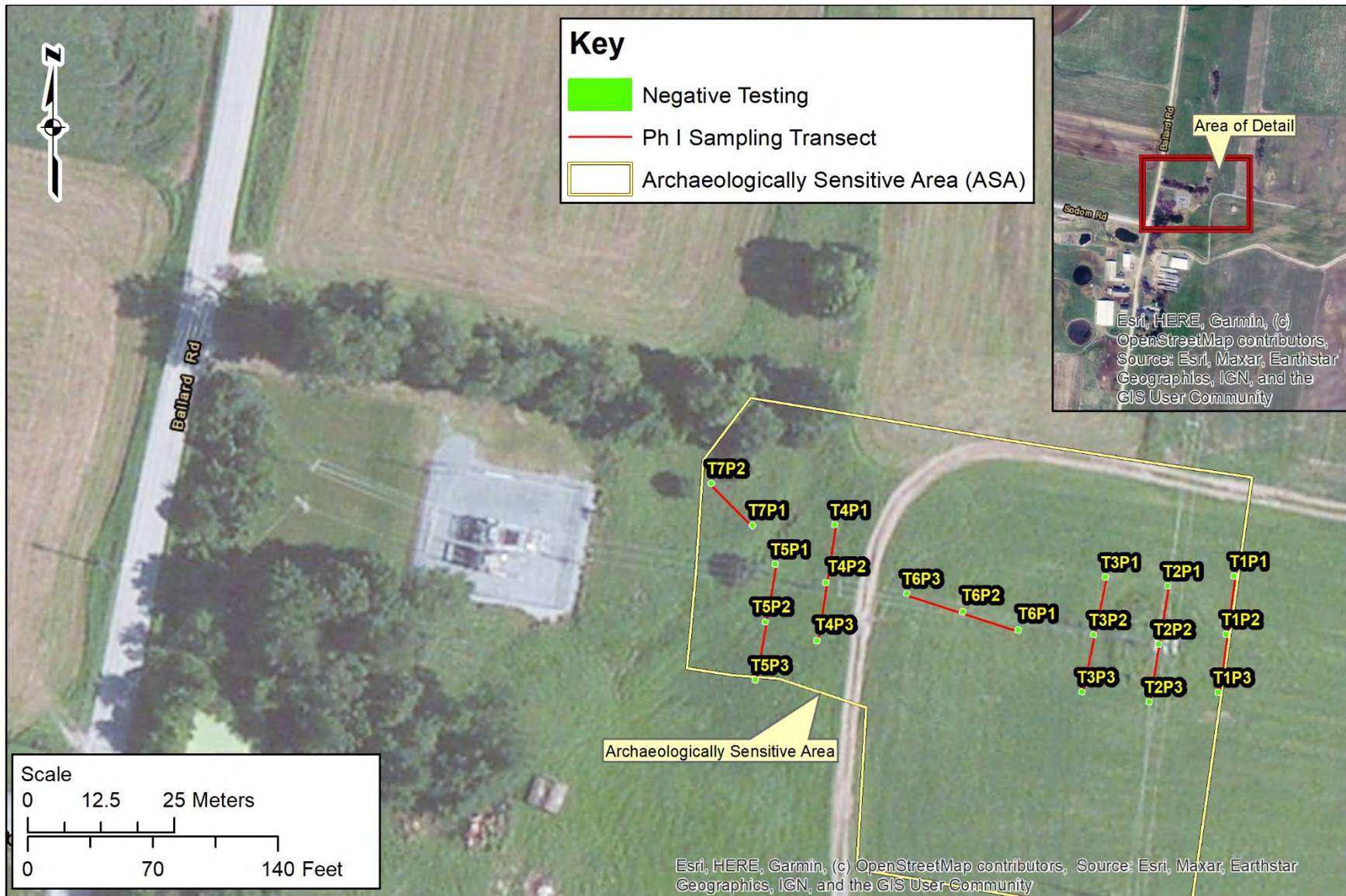


Figure 5. Aerial photograph showing the location of archaeological phase I survey transects and test pits within the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 6. View east of the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note the change in elevation.



Figure 7. View southeast of the NE ARC field crew excavating test pits along Transect 5 at the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 8. View west of NE ARC crew excavating along transect T6 at the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note the GMP structures and substation.



Figure 9. View east of NE ARC field crew members excavating test pit T3P3 at the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont

Appendix I

Northeast Archaeology Research Center - Test Pit Profile Form

Project GMP Georgia Sub F State Site # _____ Test Pit T1 P1
 Area/Locus _____ PN Area 1-100 PROV# 1 Feature #(s) _____
 Supervisor MNB Exc. Team HFK, VJK Recorder _____ Date 8/10/25

Depth (cm)	PN's / Artifacts, by level (see reverse for codes)	Soil Descriptions
0-10	NAR	A (0-31 cm) 10 YR 4/3
10-31		Sandy loam
31-40		B (31-40 cm) 10 YR 5/6
40-68		Sandy loam
68-88		C (40-68 cm) 2.5 Y 4/4
88-130		Loamy clay

Comments* _____

Number of bags: 0

* Provide comments on Artifacts, Soils, Disturbances, Context, etc.

Northeast Archaeology Research Center - Test Pit Profile Form

Project GMP Georgia Sub I State Site # _____ Test Pit T5P2
 Area/Locus _____ PN Area 101-200 PROV# 107 Feature #(s) _____
 Supervisor MNB Exc. Team HFK, VJK Recorder WLB Date 8/11/25

Depth (cm)	PN's / Artifacts, by level (see reverse for codes)	Soil Descriptions
0-10		Ap (0-45 cm) 10 YR 5/3 Bn
10-20		Ca Lr
20-30	PN 10 (CENTR) 10-145(1)	(45-65 cm) 2.5 Y 4/4 Pa bn
30-40		fine sand
40-60		
60-70		
70-80		
80-90		
90-100		
100-110		
110-120		
120-130		

Comments* 2 pieces of white ware
4 one piece of ground glass
vessel in 101 3-AP

Number of bags: 1

* Provide comments on Artifacts, Soils, Disturbances, Context, etc.

Northeast Archaeology Research Center - Test Pit Profile Form

Project GMP Georgia Sub I State Site # _____ Test Pit T4 P2
 Area/Locus _____ PN Area 1-100 PROV# 7 Feature #(s) _____
 Supervisor MNB Exc. Team HFK, VJK Recorder VJK Date 8/11/25

Depth (cm)	PN's / Artifacts, by level (see reverse for codes)	Soil Descriptions
0-37	NAR	A (0-37 cm) 10 YR 5/3 Sandy loam w/ heavy P&P
37-40		
40-60		
60-80		
80-100		
100-120		
120-130		

Comments* Impass on rock ledge

Number of bags: 0

* Provide comments on Artifacts, Soils, Disturbances, Context, etc.

Northeast Archaeology Research Center - Test Pit Profile Form

Project GMP Georgia Sub I State Site # _____ Test Pit T7 P2
 Area/Locus _____ PN Area 1-100 PROV# 11 Feature #(s) _____
 Supervisor MNB Exc. Team MNB, HFK, VJK Recorder VJK Date 8/11/25

Depth (cm)	PN's / Artifacts, by level (see reverse for codes)	Soil Descriptions
0-21	NAR	A (0-21 cm) 10 YR 5/3
21-40		Fine silt w/ P&P
40-60		C (21-40 cm) 10 YR 6/3
60-80		Fine silt w/ P&P
80-100		
100-120		
120-130		

Comments* N/C/M

Number of bags: 0

* Provide comments on Artifacts, Soils, Disturbances, Context, etc.

Northeast Archaeology Research Center, Inc.

Scott Lehman
Green Mountain Power
2152 Post Road
Rutland, VT 05701

February 2, 2026

RE: Green Mountain Power Georgia Substation Upgrade Project, Georgia, Franklin County, Vermont: Comment on Revised Project Plans

Dear Scott,

We write to provide additional comment on the proposed Green Mountain Power (GMP) Georgia Substation Upgrade Project located in Georgia, Franklin County, Vermont (Figure 1). The Project includes substation upgrades, including a new substation and associated line and structure replacement work, placement of a temporary substation, and access. This document provides comment on an update to Project plans, in the form of the relocation of the temporary portable substation, which is now proposed to be placed upslope and to the east of the existing substation (Figures 2 and 3).

The overall Project area was the subject of an archaeological resource assessment (ARA) undertaken by the Northeast Archaeology Research Center, Inc. (NE ARC) in 2023 (Northeast Archaeology Research Center, Inc. 2024). The ARA determined that the eastern portion of the Project area includes a minimally disturbed landform which is considered archaeologically sensitive for the presence of pre-contact sites (see Figure 2). NE ARC subsequently undertook a Phase I identification survey in 2025 (Clausnitzer Jr. and Hudgell 2025). In combination, the archaeological studies were designed to identify all archaeological sites, Native American or historic Euroamerican, that may be present within the Project area of potential effect (APE) or to establish that it is unlikely that site(s) are present. The archaeological work was required as part of the Vermont Public Utility Commission Section 248 review process. Guidelines determined by the Vermont Division for Historic Preservation (VDHP) are also germane (VTSHPO 2017).

The Phase I survey included a total of 20 0.5 x 0.5 m test pits placed along seven linear transects, T1 through T7, within the archaeologically sensitive area, for a total excavation of 5.0 sq m (Figures 4 and 5). None of this testing produced any pre-contact artifacts or any potentially significant Euroamerican artifacts, and as a result no further archaeological work was recommended prior to Project construction (Clausnitzer Jr. and Hudgell 2025).

The updated Project plans position the temporary substation within the defined archaeologically sensitive area. While the previous Phase I testing did not fully extend into the area of the proposed temporary substation, the northernmost test pit on transect T3 falls within this area (see Figure 5). Furthermore, testing along transects T1 through T3, which were placed to test a proposed pole location, also focused on the most elevated and level portion of the landform and thus in the area of the highest

sensitivity within the overall archaeologically sensitive area (Figure 6). As noted, none of the test pits excavated on this landform produced any pre-contact or substantial post-contact period material. Given the focus of the testing to best sample the microtopography, in addition to the negative results, it is considered unlikely that a potentially significant pre- or post-contact archaeological site is located within the area of the proposed temporary substation.

Therefore, it is considered unlikely that the Project as planned would have an adverse effect on significant, i.e., State or National Register of Historic Places eligible archaeological sites, and no additional archeological work is recommended prior to Project construction.

Please let us know if you have any questions or comments and thank you for the opportunity to conduct this study.

Sincerely,



Gemma-Jayne Hudgell, Ph.D.
Director, NE ARC, Inc.



Hutch M. McPheters
Director, NE ARC, Inc.

References Cited

Clausnitzer Jr., Arthur and Gemma-Jayne Hudgell

2025 *Archaeological Phase I Survey of the Proposed Green Mountain Power Georgia Substation Project, Franklin County, Vermont*. End-of-field letter prepared for Green Mountain Power by the Northeast Archaeology Research Center, Farmington, Maine.

Northeast Archaeology Research Center, Inc.

2024 *Archaeological Resource Assessment of the Proposed Green Mountain Power Georgia Substation Project, Franklin County, Vermont*. Prepared for Green Mountain Power by the Northeast Archaeology Research Center, Farmington, Maine.

USDA

2024 Web Soil Survey. Electronic Source, <http://websoilsurvey.nrcs.usda.gov>. Accessed 2024.

VTSHPO

2017 *The Vermont State Historic Preservation Office's Guidelines for Conducting Archaeology In Vermont and Appendices*. Vermont State Historic Preservation Office, Montpelier, VT.

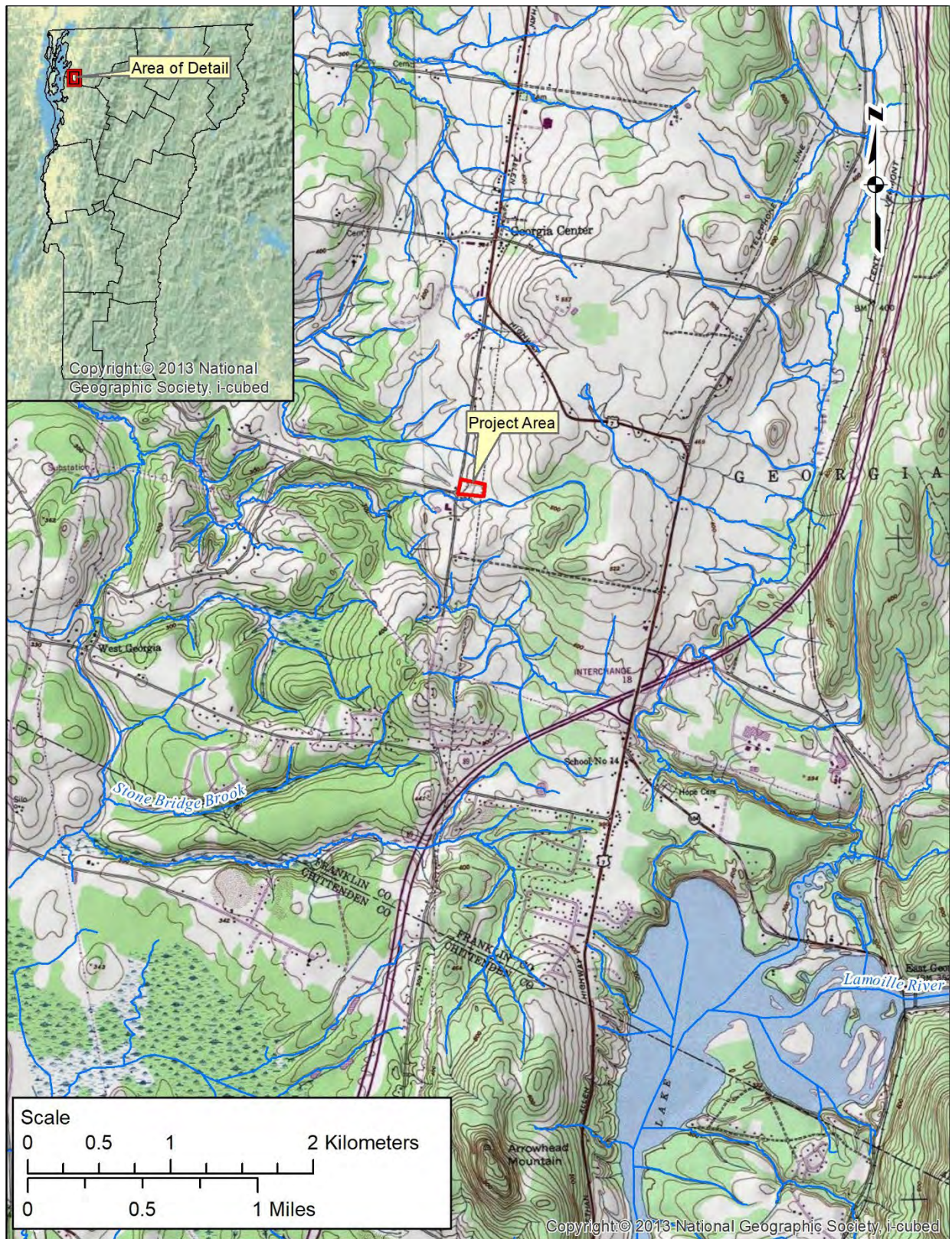


Figure 1. USGS Topographic map showing the location of the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.

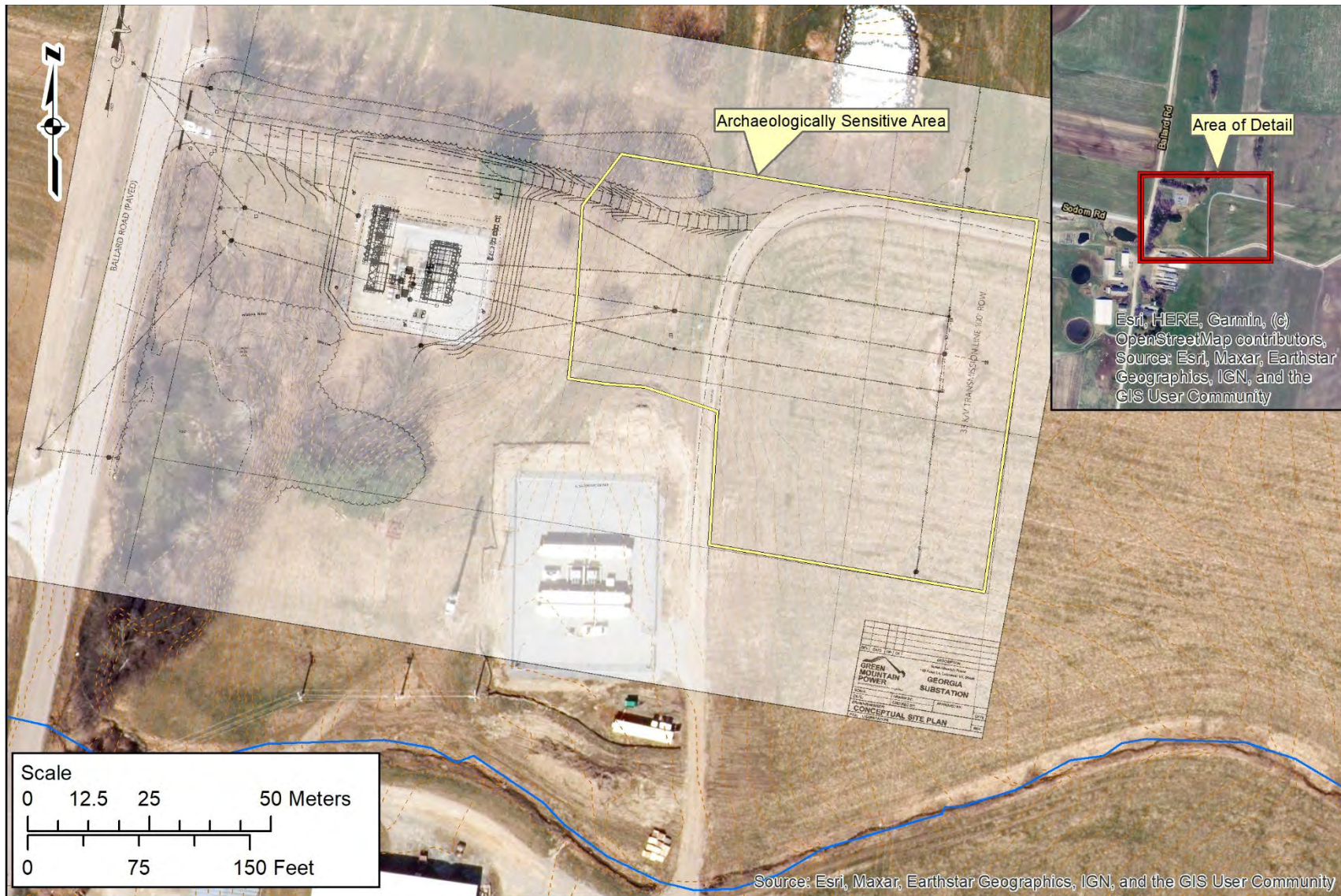


Figure 2. Initial Project plans for the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont overlaid on aerial photograph. Note location of identified Archaeologically Sensitive Area.

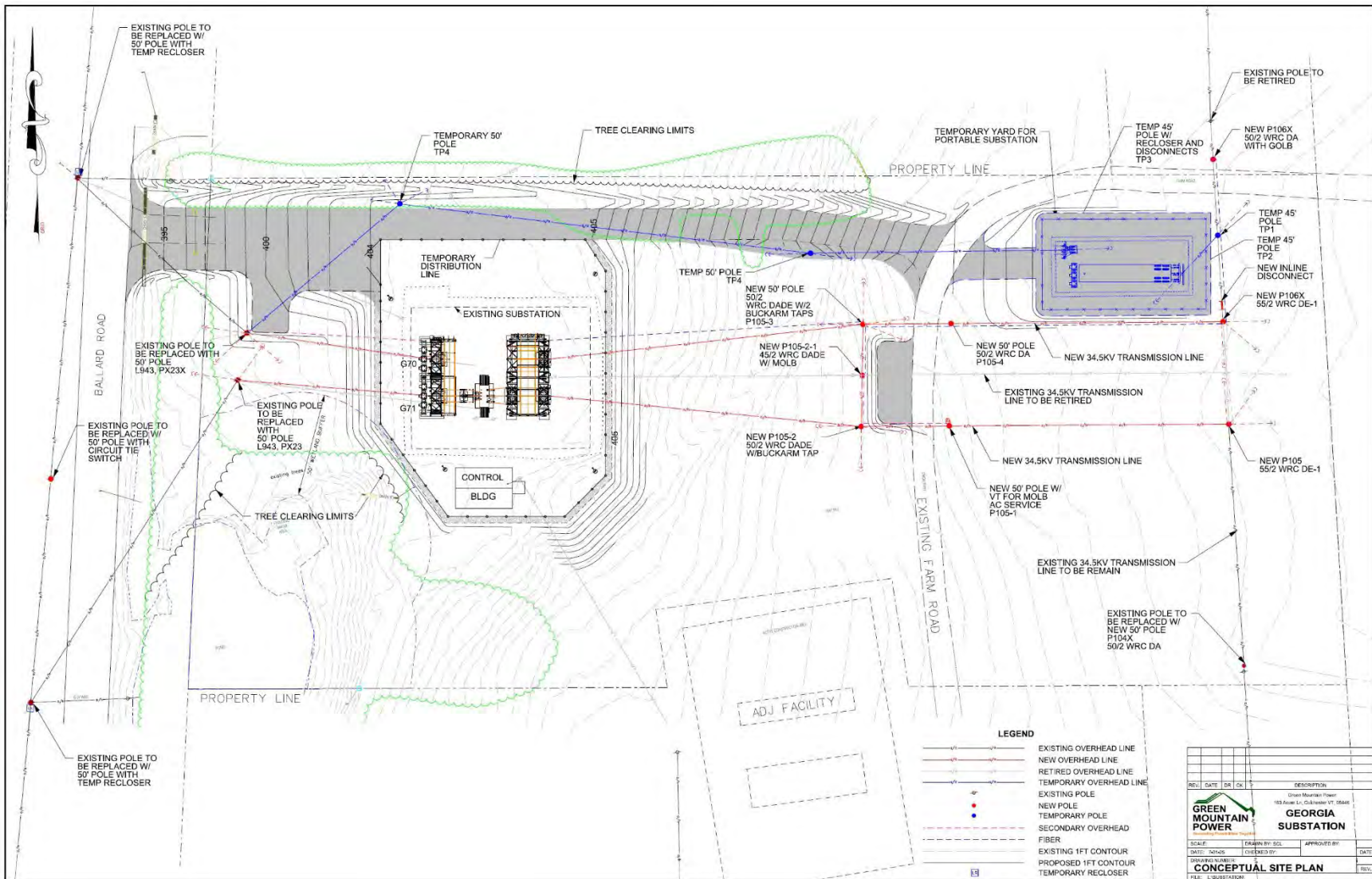


Figure 3. Revised Project plans for the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note new area of temporary substation.

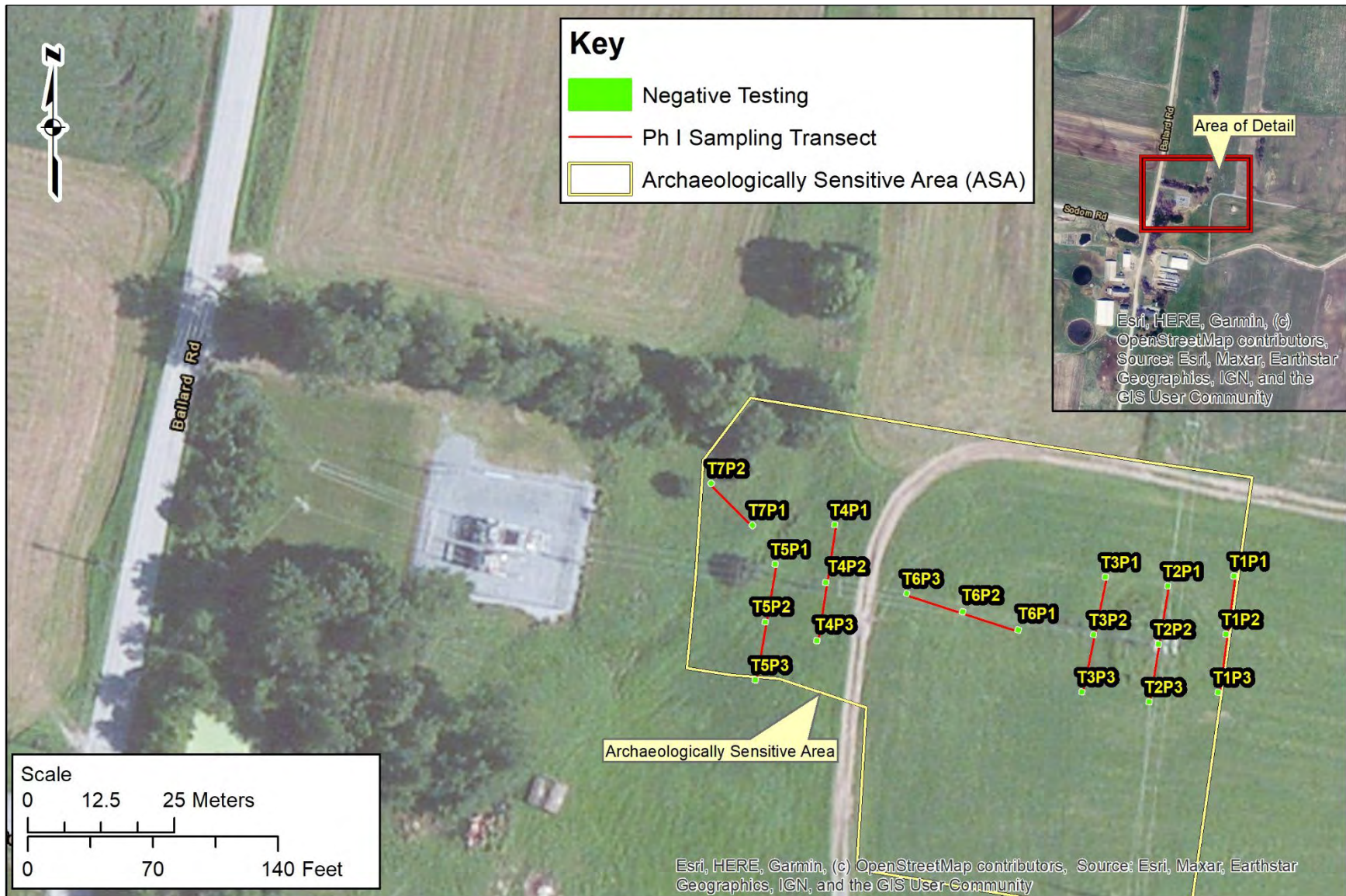


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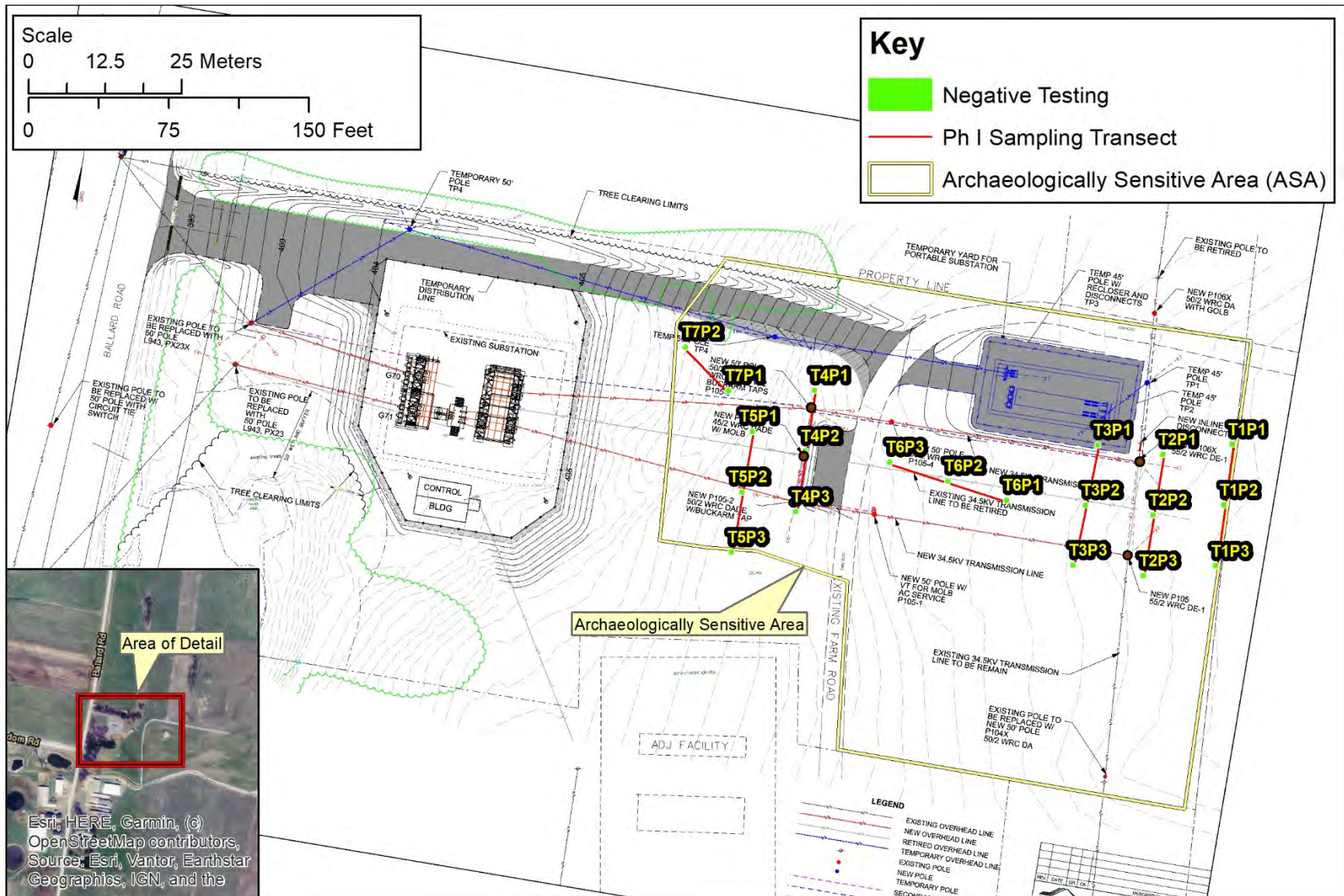


Figure 5. Updated Project plans showing the location of archaeological phase I survey transects and test pits within the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont.



Figure 6. View southeast of the area proposed for the temporary substation within the proposed Green Mountain Power Georgia Substation Upgrade Project, Franklin County, Vermont. Note the existing pole on the 34.5 kV line to be retired, which was the location of archaeological survey transects T1 through T3, and slope of landform in the area of the proposed temporary substation.