

APPENDIX 5: HISTORICAL / ARCHAEOLOGICAL

1996 MEMORANDUM OF AGREEMENT

**MEMORANDUM OF AGREEMENT
BY AND AMONG THE FEDERAL HIGHWAY ADMINISTRATION
AND
THE VERMONT STATE HISTORIC PRESERVATION OFFICER**

**SUBMITTED TO THE ADVISORY COUNCIL ON HISTORIC PRESERVATION
PURSUANT TO 36CFR Part 800.6(a)**

WHEREAS, the Federal Highway Administration (FHWA) has determined that the Southern Connector/ Champlain Parkway Project MEGC-M5000(1), Chittenden County, Burlington, Vermont will have an effect upon the two National Register districts in the project area, the Battery Street Historic District, and the Lakeside Historic District, two eligible National Register districts, the Pine Street Historic District and the Queen City Cotton Mill Historic District, one known archeological site, VT-CH-81, and several archeologically sensitive areas, and has consulted with the Vermont State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to 36CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f); and Section 110f of the same Act (16 U.S.C. 470h-2(f)); and

WHEREAS, the City of Burlington (City) participated in the consultation and has been invited to concur in this Memorandum of Agreement; and

WHEREAS, the Vermont Agency of Transportation (AOT), as the state Agency responsible for implementation of the project, participated in this consultation process; and

WHEREAS, the Burlington Street Department Building, a long, linear brick building, constructed in 1934 as an office and vehicular maintenance garage for the City Public Works, continues to serve its historic, original function and is eligible for listing on the National Register in the proposed Pine Street Historic District. The property is on a site formerly used (since the mid 19th century) as a lumber yard; and

WHEREAS, the SHPO and the FHWA have determined that all proposed alternative alignments of the project will have an adverse effect on the Burlington Street Department property, even if no alterations are made to the building, because the project will take a section of the property's land, impacting the historic use of the property, eliminating necessary parking and storage areas, and thus preventing the Burlington Street Department to operate efficiently; and

WHEREAS, the SHPO and the FHWA have determined that the project will have no adverse effect on the remainder of the above-ground historic resources in the project area; and

WHEREAS, hazardous waste is known to exist in the project area; and

WHEREAS, the completion of the Determination of Effect on archeological sites will be carried out in accordance with the stipulations in this Memorandum of Agreement, and

NOW THEREFORE, the FHWA, the SHPO, the AOT and the City agree that the project shall be implemented in accordance with the following stipulations in order to take into account the project's effect on the Pine Street Historic District.

Stipulations

The FHWA, in consultation with the AOT, will ensure that the following measures are carried out:

A. THE PINE STREET HISTORIC DISTRICT

(1) The Burlington Certified Local Government (CLG) and the AOT in consultation with the SHPO and FHWA will develop a preservation plan for the Pine Street Historic District and the Burlington Street Department Building, before semi-final project plans are approved. The plan will be submitted to the SHPO for review and approval prior to implementation. The preservation plan shall include:

a) documents necessary to complete a National Register nomination for the Pine Street Historic District, including a small photographic exhibit for interpretation of the property for display in a public space of the building;

b) marketing documents for the Burlington Street Department building;

c) a marketing plan for adaptive use, to seek out new uses and tenants for the building, and to explore zoning to foster new uses; availability of the property will be advertised regularly in local and regional newspapers for a period of time agreed upon in the marketing plan by FHWA and the SHPO;

d) a treatment plan for the building in the event of relocation; should a purchaser propose to relocate the Burlington Street Department Building, the recipient and the relocation site will be approved by the FHWA following review by the SHPO; AOT, in consultation with the SHPO, will determine whether an identification archeological study is necessary at the new location; before the Burlington Street Department Building is moved, City of Burlington shall ensure that it is documented in its original setting and context; City of Burlington, in consultation with the SHPO, shall ensure that the property is moved by a professional mover who has the capability to move historic buildings properly; within 90 days following any relocation, the Vermont SHPO will reevaluate the building on its new location to determine its continued eligibility for inclusion in the National Register of Historic Places; prior to permitting the Burlington Street Department Building to be moved, City of Burlington will execute a contract with the recipient ensuring that after the Burlington Street Department Building is relocated the recipient will accept title to the Burlington Street Department Building subject to the covenant or facade easement.

e) a plan for interim protection to ensure that the Burlington Street Department property is secured and protected from vandalism, weather damage, construction damage, and arson during the period it is unoccupied;

(2) The AOT, SHPO and CLG should have the opportunity to review final plans of the selected alternative before final design is complete to ensure that the design of the project is compatible with the historic resources in the Pine Street Historic District.

(3) Prior to any alteration, relocation, or transfer, the Burlington Street Department property will be recorded to standards acceptable to the SHPO. All documentation should be accepted by the SHPO prior to implementation of any relocation, or alterations. Copies of the documentation will be provided to the CLG.

(4) A Covenant or Preservation Easement shall be prepared to preserve the architectural integrity of the building's exterior facade. The City of Burlington shall ensure that transfer of the property incorporates the covenant or preservation easement. The covenant or preservation easement will be executed prior to the transfer of title and will be recorded in the real estate records of Chittenden County, State of Vermont, for the sale of the Burlington Street Department Building.

B. ARCHEOLOGICAL RESOURCES

(1) The project's area of environmental impact is understood to include all areas that may be disturbed or otherwise impacted as part of this project including, for example, enlargement of the Lakeside Avenue drainage outlet. Completed at this time is a Phase 1a survey with no subsurface testing. The AOT in consultation with the SHPO will conduct appropriate identification, evaluation, and data recovery studies of the project's area of environmental impact prior to the initiation of any ground disturbing activities; these studies will include a Phase 1b for field testing, Phase 2 for Determination of Eligibility for listing of resources on the National Register, and Phase 3 for data recovery.

(2) Hazardous waste is known to exist in the area. Should archeological studies be necessary in a hazardous waste area, the AOT may need to subcontract with an EPA-certified archeological consultant to undertake such a study. The work will need to be phased because of the hazardous wastes in the area. The possibility exists that all work will cease; in the event of this happening, the AOT in consultation with the SHPO will determine how to proceed.

(3) If archeological sites are identified that in the opinion of the FHWA and SHPO are eligible for inclusion in the National Register, the FHWA will ensure that such sites are avoided and preserved in-place, in accordance with stipulation B(4) or, treated in accordance with the data recovery stipulation B(5) and C(1-3).

(4) The AOT will ensure that a plan to preserve archeological sites in place is developed in consultation with the SHPO and FHWA and reviewed and approved by the SHPO. Unless the SHPO objects within 30 days after receipt of the plan, the FHWA shall ensure that the plan is implemented.

(5) If National Register eligible sites cannot be preserved in place, the SHPO and FHWA will ensure that a treatment plan is developed in consultation with the SHPO and reviewed and approved by the SHPO. The AOT will submit the plan to the SHPO and Council for 30 day review. Unless the SHPO or the Council object within 30 days after receipt of the plan, the FHWA and AOT will assume that there are no objections and ensure that the plan is implemented.

(6) Right-of-way and semi-final project plans will be submitted to the AOT Transportation Archeologist for final review at least 60 days before construction begins. Construction will not begin until clearance is obtained from the AOT Transportation Archeologist.

C. PERFORMANCE STANDARDS FOR ARCHEOLOGICAL STUDIES

(1) All archeological studies will be completed in accordance with the *Secretary of the Interior's Standards and Guidelines for Archeology* (48 FR 44734-37), the SHPO's *Guidelines for Conducting Archeological Studies in VT* and the Advisory Council's *Treatment of Archeological Properties*. The SHPO will review and approve all scopes of work, treatment plans resulting from this MOA and drafts of all reports. Precise site locational data will be provided in a separate report appendix if it appears that public distribution of such information may jeopardize archeological sites.

(2) All studies will be conducted prior to the initiation of any ground disturbing activities.

(3) All archaeological studies, including field inspections, will be conducted by an archeologist meeting the Secretary of the Interior's's Professional Qualifications Standards (48 FR 44748-9).

(4) AOT will distribute copies of archeological reports to interested organizations and individuals. The SHPO will assist AOT in preparing a mailing list for report distribution.

(5) All public education and outreach products required as part of any Phase III data recovery studies will be developed in cooperation with the City of Burlington's Historic Preservation Commission.

D. TREATMENT OF HUMAN REMAINS

(1) If human remains are accidentally uncovered during construction, the AOT will notify appropriate authorities and follow state law.

(2) In accordance with state laws that protect unmarked burials, if previously unidentified human remains are discovered during construction, that portion of the project will stop immediately. The remains will be respectfully covered over and the project engineer will immediately contact AOT's Transportation Archeologist and the SHPO. A treatment and reburial plan will be developed by the AOT and SHPO in consultation with FHWA and appropriate Native Americans such as the Abenaki Nation. The FHWA will ensure that the treatment and reburial plan is fully implemented. Avoidance and preservation in place is the preferred option for treating human remains.

E. BORROW AREAS, DISPOSAL SITES, STAGING AREAS

Location maps for borrow areas, disposal sites, and staging areas for this project will be submitted to the AOT Transportation Archeologist for review and approval as soon as they become available and at least 20 business days prior to their proposed use. If the AOT determines that any of the areas have the potential for containing archeological sites, AOT shall notify the SHPO. AOT shall cause a field inspection to be conducted to identify the need for a Phase I Study. The contractor shall be responsible for any necessary follow-up Phase I, Phase II and III studies.

F. DISCOVERY

(1) If previously unidentified archeological sites are discovered during project construction, that

portion of the project will stop immediately. The project engineer will immediately contact the SHPO. No further construction will proceed until the requirements of 36 CFR 800.11 have been satisfied.

(2) The AOT will consult with the SHPO to record, document and evaluate the National Register eligibility of the site and the project's effect on the site, and to design a plan for avoiding or mitigating adverse effects on a potentially eligible site.

G. DISPUTE RESOLUTION

Should the SHPO object within 30 days to any actions proposed pursuant to this agreement and the objection cannot be resolved, the FHWA shall request the further comments of the Council pursuant to 36 CFR Section 800.6 (b). Any Council comment provided in response to such a request will be taken into account by the FHWA in accordance with 36 CFR Section 800.6 (c) (2) with reference only to the subject of the dispute; the FHWA's responsibility to carry out all actions under this agreement that are not the subjects of the dispute will remain unchanged.

H. COORDINATION WITH OTHER FEDERAL AGENCIES

In the event that this project must receive a U.S. Army Corps of Engineers (Corps) Section 404 permit, the Corps can comply with Section 106 and 36 CFR 800 regulations by conditioning its permit with the stipulations set forth in this executed MOA. The Corps must notify the SHPO in writing of their intent to meet the terms of the MOA as a condition of their permit and submit a copy of the permit to the SHPO.

I. PROJECT COORDINATION

(1) If archeological resources have been identified during project planning and they are being treated through whole or partial avoidance, the project's consulting archeologist hired by the AOT, or the AOT archeologist, will conduct a mandatory, on-site briefing for key contractor and state construction personnel prior to the beginning of construction.

(2) The AOT will ensure that key project and construction personnel are thoroughly familiar with the content of this MOA.

(3) The MOA will be included in the construction contract for this project.

(4) The AOT must provide a copy of the MOA to the project's consulting archeologist hired by the AOT, or the AOT archeologist.

(5) The AOT shall ensure that all historic research carried out pursuant to this agreement is carried out by or under the direct supervision of a person or persons meeting at a minimum the *Secretary of the Interior's Professional Qualifications Standards* (48FR 44738-9) for Historians; that all studies in architectural history are carried out by or under the direct supervision of a person or persons meeting at a minimum the *Secretary of the Interior's Professional Qualifications Standards* (48FR 44738-9) for Architectural Historians; and that all archeological

studies are carried out by or under the direct supervision of a person or persons meeting at a minimum the *Secretary of the Interior's Professional Qualifications Standards* (48FR 44738-9) for Archeologists.

J. If any of above Stipulations have not been implemented within three (3) years after execution of this agreement, the parties to this agreement shall review this agreement to determine whether revisions are needed. If revisions are needed, the parties to this agreement will consult in accordance with 36CFR Part 800 to make such revisions.

K. Should any party to this agreement object within thirty (30) days after receipt to any plans, specifications, contracts, or other documents provided for review pursuant to this agreement, or to the manner in which this agreement is being implemented, AOT shall consult with the objecting party to resolve the objection. If AOT determines that the objection cannot be resolved, AOT shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

(1) provide AOT with recommendations, which AOT will take into account in reaching a final decision regarding the dispute; or

(2) notify AOT that it will comment pursuant to 36 CFR Part 800.6(b) and proceed to comment. Any Council comment provided in response to such a request will be taken into account by AOT in accordance with 36 CFR Part 800.6(c)(2) with reference to the subject of the dispute.

L. At any time during implementation of the measures stipulated in this agreement, should an objection to any such measure raised by a member of the public, AOT shall take the objection into account and consult as needed with the objecting party, the SHPO, other as needed, and the Council if necessary to resolve the objection.

Execution of this Memorandum of Agreement by the FHWA and the Vermont SHPO, its subsequent acceptance by the Council, and implementation of its terms, evidence that the FHWA has afforded the Council an opportunity to comment on the Southern Connector/ Champlain Parkway Project MEGC-M5000(1), Chittenden County, Burlington, Vermont and its effects on historic properties, and that the FHWA has taken into account the effects of the undertaking on historic properties.

FEDERAL HIGHWAY ADMINISTRATION

By: Frederick H. Downs Date: 8/9/96

Frederick H. Downs
FHWA Division Administrator

VERMONT STATE HISTORIC PRESERVATION OFFICER

By: [Signature] Date: 7/21/96

Townsend Anderson
State Historic Preservation Officer

VERMONT AGENCY OF TRANSPORTATION

By: [Signature] Date: 7-26-96

Glenn Gershaneck
Secretary of the Agency of Transportation

ACCEPTED FOR THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: [Signature] Date: 12/30/90

Name JOHN FOWLER
ACTING EX. DIR.

CONCURRENCE OPTIONS:

Concur:

CITY OF BURLINGTON
By: [Signature]

Date: 8/3/96

Name STEVEN GOODKIND
Title CITY ENGINEER

**2003 SUMMARY OF CULTURAL RESOURCE SURVEYS
COMPLETED FOR THE
SOUTHERN CONNECTOR/CHAMPLAIN PARKWAY**

WERNER ARCHAEOLOGICAL CONSULTING
LETTER REPORT: SUMMARY OF
CULTURAL RESOURCE SURVEYS COMPLETED FOR THE PROJECT

prepared for

Clough, Harbour and Associates LLP (CHA)
Transportation Section
III Winners Circle
Albany, New York 12205

Date: May 8, 2003

Project: MEGC-M5000(1)
Southern Connector
(Champlain Park Way)

Location: City of Burlington
Chittenden County, Vermont

Vermont Agencies: Department of Public Works
City of Burlington

Agency of Transportation (VTrans)

Project Director and Chief Archaeologist: S.U. Werner, Certified Archaeologist

Project Principal Investigator: M.R. Werner, Ph.D.

1. Introduction: On April 10, 2003, during a project meeting at the Burlington Department of Public Works Building (J. Shields 2003), VTrans Archaeologist Duncan Wilkie and Michael Werner (Werner Archaeological Consulting [WAC]) met to discuss means for updating the cultural resource sections of the *Final Supplemental Environmental Impact Statement* for the project (U.S. Department of Transportation *et al.* 1997). It was decided that WAC would prepare a summary of the cultural resource assessments that had been completed to date which would be submitted to VTrans to assist in updating the document. The summary is contained in the report which follows here.

2. Cultural Resource Assessment Summary: The following list records the assessments which were completed after the M5000(1) Southern Connector Project was reactivated in 2000. The work recorded here was proposed on the basis of a comprehensive evaluation of what had been done for the Southern Connector Project since 1979 and what remained to be done for the modified project. This evaluation was completed by WAC in close consultation with VTrans Transportation Archaeologist Duncan Wilkie, whose advice and assistance are gratefully acknowledged. Appended to the list is a group of documents (*B. Work by Other Firms*) which refers to work in or adjacent to the project completed or in progress by other archaeological consulting firms. Assessments are listed in chronological order in each category with appropriate cross-referencing to the bibliography below.

A. Work Completed by WAC

Southern Connector, Preliminary Assessment (July 2000): This is a report on the results of a comprehensive assessment of the culture resource studies which had been completed as of July 10, 2000 and a recommendation of what measures should be taken to complete the evaluation of cultural resources for the Southern Connector Project. (S.U. and M.R. Werner 2000a)

Southern Connector, Proposed Program for Cultural Resource Assessment (October 2000): This is a formal proposal on a contract by contract basis of the cultural resource studies necessary to complete evaluation of the Southern Connector Project. The studies in this proposal were intended to identify and evaluate historic sites (prehistoric and historic archaeological sites and historic structures and districts) by following the regulations, standards and procedures in Section 106 of the National Historic Preservation Act and Vermont's Historic Preservation Act. Work was proposed on the following components of the project: Historic Map Component*, C-1 Alignment, Bikepath (now shared-use path; Phase IA and B studies), C-2 Alignment (Phase IA and B studies) and C-6 Alignment (including segments of Pine Street and Battery Street** and Lakeside Avenue; Phase IA study). At a later date, at the request of the client, an assessment of the Lakeside Avenue drainage outlets and review and editing of the Final Supplemental Environmental Impact Statement (U.S. Department of Transportation *et al.* 1997) were added. (S.U. and M.R. Werner 2000b)

*With the collaboration of the Wilbur Local History Collection of the Bailey/Howe Library at the University of Vermont, relevant historic maps were copied and then scanned/digitized at CHA and overlaid on the project impacts map to facilitate identification of historic resources which might be affected by the project.

**The C-6 Alignment study excludes work related to the Battery Street Extension and railyard mitigations, which is being completed by the Archaeology Research Center (ARC), University of Maine at Farmington. Work in these areas had been begun by ARC already in 1996 and, in the interests of efficiency, it was recommended that ARC continue the assessments in those areas.

C-1 alignment, Shared-Use Pathway, Phase IA Survey (September 2001, May 2003): This was a survey of the proposed share-use pathway (originally referred to as a bikepath) on the north side of the built C-1 alignment from US Route 7 to Pine

Street. Because of prehistoric sensitivity a Phase IB study was recommended. (S.U. and M.R. Werner 2001a; S.U. and M.R. Werner 2003a)

C-2 alignment, Phase IA Survey (September 2001): This study included the alignment of the highway and shared-use path alignment and the cul-de-sacs associated with this contract. Because of prehistoric and historic sensitivity a Phase IB study was recommended. (S.U. and M.R. Werner 2001b)

C-1 and C-2 alignments, Phase IB Survey (April 2002): Field testing in these areas produced negative results and no further work was recommended. (S.U. and M.R. Werner 2002a, 2003a)

C-6 alignment, Lakeside Avenue drainage outlets, Phase IA Survey (July 2002, May 2003): A determination of no historic resources affected was recommended because the use of the existing drains into Lake Champlain and the Pine Street Barge Canal site would not impact significant historic properties. (S.U. and M.R. Werner 2002a; S.U. and M.R. Werner 2003b)

C-6 alignment, Pine and Battery Streets, Lakeside Avenue, Phase IA Survey (October 2002): A determination of no historic resources affected was recommended because the impacts of the proposed construction would not impact significant historic properties. (S.U. and M.R. Werner 2002b)

B. Work by Other Firms

Southern Connector, DHP Review (January 1996): This is the only comprehensive tabulation of cultural resource assessments completed for the project from 1977 to 1996; it also contains some critical analysis of the adequacy of the assessments done in that period and commentary on what remained to be done. (D.C. Wilkie and A.S. Veilleux 1996)

Pine Street Canal Superfund Site, Phase IA Survey (1992): This is the first comprehensive and systematic assessment of archaeological resources in the superfund site. Three categories of cultural resources were identified on the site, which consist of resources previously determined eligible for the National Register (Queen City Cotton Company, Pine Street Canal), resources potentially eligible for the National Register (Maltex Complex, canal draw bridge, eight boat wrecks in the canal) and potential resources which may be eligible for the National Register (archaeological resources). (L.J. Cook and J.P. McCarthy 1992)

Pine Street Canal Superfund Site, Historic Resources Survey (May 2001): This study is an assessment of the impacts of proposed remediation measures on significant and potentially significant historic resources on the site. The historic resources include: the barge canal, canal boats sunk in the canal, boat construction marine railways, drawbridge and breakwater remains. (D.C. McVarish *et al.* 2001: n.p. [i])

C-6 alignment (Battery Street, Lakeside Avenue and Pine Street), Historic Structures Survey (February 1996): The area surveyed included all the properties adjacent to Pine Street, South Battery Street and South Champlain Street which are located

south of Maple Street, east of Lake Champlain and north of Lakeside Avenue. The historic resources identified consisted of the Battery Street Historic District (NR listed), the Lakeside Historic District (NR listed), the Pine Street Historic District (recommended for NR nomination; this includes structures which would be affected by the Battery Street Extension), the Queen City Cotton Mill Historic District (on Lakeside Avenue; recommended for NR nomination), and miscellaneous historic properties. The effects of the proposed railroad spurs (wyes) were also evaluated: the Mobil Wye (possibly adverse), the Grocery Spur (not adverse) and the South Leg Spur (adverse). (L. Pritchett 1996)

C-6 alignment, Phase IA Survey (December 1996): Included in this survey were the Battery Street Extension, the Lakeside Avenue improvement and drainage outlet [into Lake Champlain], the proposed relocation site of the historic structure at no. 216 Battery Street and three railroad track alterations (the Mobil Wye, the Grocery Spur and the South Leg Wye). A Phase IB survey was recommended for all of the components examined, except for the Lakeside Avenue improvement. (R.P. Corey and J.B. Petersen 1996)

C-6 alignment, Battery Street Extension, Phase IB Survey (April 1997): Field testing was completed for the five alternatives proposed for the Battery Street Extension, and resulted in the identification of five historic Euroamerican archaeological sites: the Gregory (VT-CH-732), Post (VT-CH-733), Coal (VT-CH-734), Lawn (VT-CH-735) and Rail (VT-CH-736) sites. The areas proposed for the relocation of no. 216 Battery Street, the Mobil Wye component and the Lakeside Avenue drainage outlet were also examined with negative results. Phase II testing was recommended for only three sites, the Gregory, Coal and Rail sites because they were determined possibly eligible for listing on the National Register. (R.P. Corey and J.B. Petersen 1997)

C-6 alignment, Battery Street Extension, Phase II Survey July 1998): Fieldwork took place at two previously identified archaeological sites, the Gregory site (VT-CH-732) and the Rail site (VT-CH-736). Fieldwork at the Rail site (roundhouse) produced data which indicated that the site was significant enough to be eligible for inclusion on the National Register. Because the Rail site would be impacted by the proposed construction of the C-6 Alignment in this area, a Phase III data recovery was recommended for the site. At the time of this writing the data recovery project has not yet been completed because of problems relating to access to the site. Completion of the work is stipulated in the MOA for the project (Federal Highway Administration 1996: 3). (R.P. Corey *et al.* 1998)

C-6 alignment, Archaeological Resource Assessment of a Portion of the Proposed Railroad Mitigation Area [proposed]: At the date of this writing, this survey has not been completed. It is intended to identify historic resources in the area primarily west of the Battery Street Extension which is proposed for relocation of rail lines and related facilities. Completion of the work is stipulated in the MOA for the project (Federal Highway Administration 1996: 3). (S. Scharoun *et al.* 2001)

3. Conclusions: With the exceptions noted below, all of the proposed studies for archaeological assessments in the project area have been completed according to the stipulations

in the project MOA (Federal Highway Administration 1996). Difficulties in gaining access to areas associated with the Battery Street Extension and the railyards have retarded cultural resource assessment for those components of the project.

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A Stage IA Cultural Resources Survey of the Pine Street Canal Superfund Site, Burlington, Vermont. John Milner Associates, Danbury, CT.
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2000b *Proposed program for cultural resource assessment report, Preliminary assessment, MEGC-M5000(1) Southern Connector Project.* Werner Archaeological Consulting, Albany. October 2. [on file, Agency for Transportation]

2001a *Southern Connector/Champlain Parkway MEGC-M5000(1): C-1 Section, City of Burlington, Chittenden County, Vermont. Cultural Resources Investigation, Phase IA Site Identification Study.* Werner Archaeological Consulting, Albany. September. [on file, Agency for Transportation]

2001b *Southern Connector/Champlain Parkway MEGC-M5000(1): C-2 Section, City of Burlington, Chittenden County, Vermont. Cultural Resources Investigation, Phase IA Site Identification Study.* Werner Archaeological Consulting, Albany. September. [on file, Agency for Transportation]

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