

**To:** Tim Lloyd, Ph.D.  
Scientist - Archaeology  
Division for Historic Preservation  
New York State Office of Parks, Recreation & Historic Preservation

**From:** Peter Sittig, Archaeology Project Manager  
Moira Magni, Project Archaeologist  
EDR

**Date:** September 19, 2024

**Reference:** Agricola Wind Project  
Archaeological Site Avoidance Plan

**NYSHPO No:** 21PR03987

## Introduction

On behalf of Agricola Wind LLC, a wholly owned subsidiary of Liberty Renewables, Inc. (the Applicant), EDR conducted Phase IB archaeological survey for the proposed Agricola Wind Project (the Facility), located in the Towns of Venice and Scipio, Cayuga County, New York. The proposed Facility is an approximately 99-megawatt wind-powered electric generating facility and will consist of up to 24 wind turbines and supporting infrastructure, which will include access roads, collection lines, two meteorological towers, an aircraft detection lighting system tower, an operations and maintenance facility, temporary laydown yards, a temporary concrete batch plant, a collection substation, and a point of interconnection switchyard.

This Archaeological Site Avoidance Plan (the Plan) summarizes the archaeological resources identified by the Phase IB survey that are within the Facility Site but are avoided by Facility design.

## Phase IB Survey Results

The Phase IB archaeological survey was conducted within all areas categorized as elevated archaeological sensitivity that overlapped with areas that were considered for development. Phase IB archaeological survey fieldwork occurred during multiple mobilizations between June 2023 and August 2024 that were concurrent with the Facility design to inform the ongoing design and to facilitate the avoidance or minimization of potential impacts to sensitive archaeological resources identified by the survey. The results of the Phase IB survey detailed in the *Phase IB Archaeological*

Survey report (EDR, 2024) and *Phase IB Archaeological Survey Addendum Memo* (EDR, 2024a) are summarized here:

- Pedestrian survey of 266 acres and excavation of 3,128 shovel tests
- **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >  
[REDACTED]  
[REDACTED] **>END CONFIDENTIAL INFORMATION**

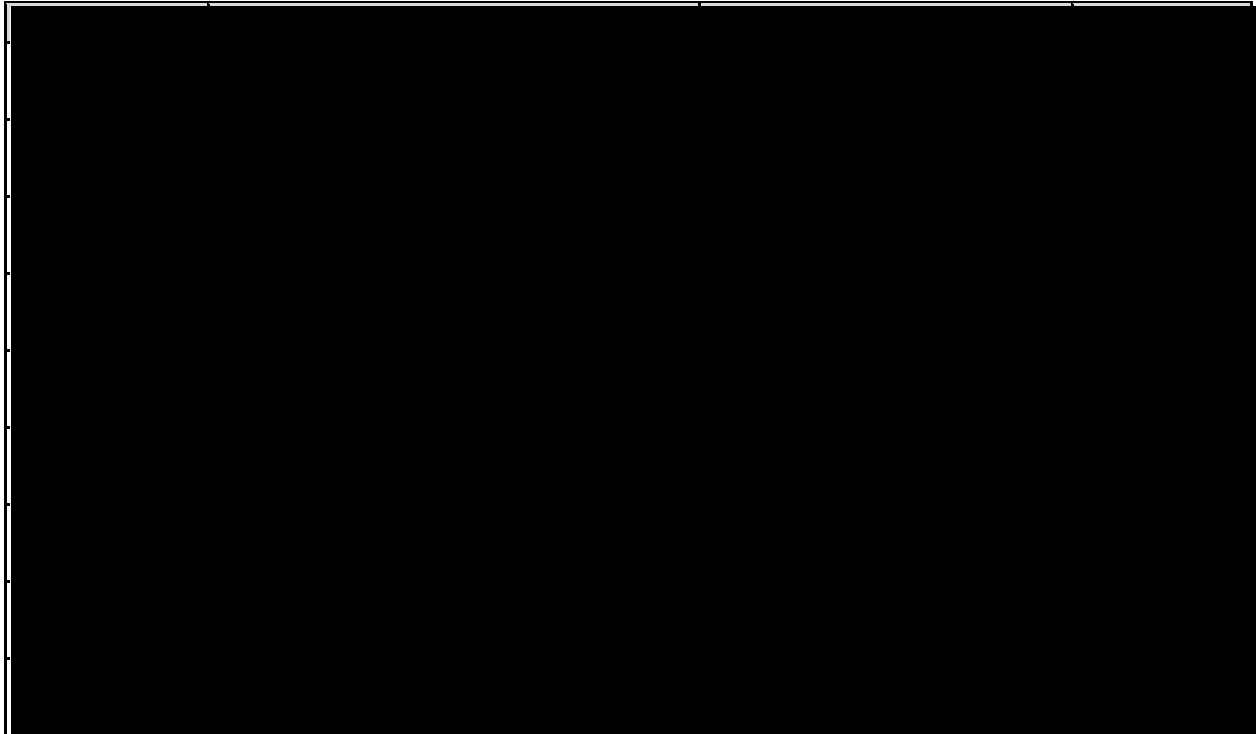
#### Archaeological Sites Recommended for Avoidance

EDR initially identified **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >  
[REDACTED]  
[REDACTED] **>END CONFIDENTIAL INFORMATION**  
**CONFIDENTIAL INFORMATION**

The Phase IB report and Phase IB Addendum memo recommended that all **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** of the sites be avoided by significant ground disturbance during Facility construction, or completion of Phase II investigations if avoidance is not possible. In an effort to avoid impacts to all unevaluated archaeological sites identified in the Phase IB survey, the Applicant has moved, modified, or eliminated several Facility components. Construction techniques were modified to avoid ground disturbance within 50 feet of all **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] **END CONFIDENTIAL INFORMATION** sites.<sup>1</sup>

Table 1 lists all **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** archaeological site locations encountered during Phase IB survey, and their status with respect to Facility location. Associated mapping clearly marking the areas as environmentally sensitive is included in Attachment A. **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >  
[REDACTED] **END CONFIDENTIAL INFORMATION**

<sup>1</sup> Note that in some instances the 50-foot avoidance buffer has been clipped to exclude established roadways and/or driveways where significant soil disturbance during construction and ongoing disturbance during maintenance has removed or compromised the stratigraphic integrity of natural soils.

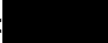
**Table 1. Summary of Site Impacts BEGIN CONFIDENTIAL INFORMATION<****>END CONFIDENTIAL INFORMATION****Unanticipated Cultural Resources Discoveries Protocol**

The Applicant recognizes that it is possible that unanticipated buried or aboveground archaeological features and/or artifacts may be encountered during Facility construction. Therefore, to provide additional safeguards against the possibility that the proposed Facility might impact unidentified archaeological resources, EDR, on behalf of the Applicant, will prepare an Unanticipated Cultural Resources Discovery Protocol (UDP). The UDP will outline the steps for fielding unanticipated discoveries of cultural resources which may be encountered during construction of the proposed Facility. This protocol will include stopping work, notifying the appropriate personnel (e.g., ORES, NYSHPO, Indigenous Nations), and photographing the finds. A site visit by an archaeologist to further investigate and document the discovery may be necessary, and appropriate mitigation measures will be determined. This process will occur in consultation with NYSHPO and Native American Nation representatives as appropriate. UDPs are written to provide construction contractors guidance and protocols for identifying possible archaeological material and/or human remains uncovered during construction, and similar protocols will be followed by archaeological crews during Phase II work.

In the event of an unanticipated discovery of potential human remains and/or funerary objects during the Phase II investigation, all work in the immediate vicinity will stop until further notice. The NYSHPO, county coroner/medical examiner, local law enforcement, and all consulting parties identified in the Protocol will be contacted. The potential remains/funerary objects will be treated with respect, left *in situ* by on-site personnel, and protected from further disturbance. If human remains or funerary objects are determined to be Indigenous, a treatment plan will be developed in consultation with the NYSHPO and the appropriate Nations, consistent with established protocols and guidance. These will include NYSHPO's Human Remains Discovery Protocol (2021), the Advisory Council on Historic Preservation's (ACHP) *Policy Statement on Burial Sites, Human Remains and Funerary Objects* (ACHP, 2023), and the *Haudenosaunee Policy on Human Remains* (Grand Council of the Haudenosaunee, 2014).

The NYSHPO, ACHP, and Haudenosaunee human remains protocols all require temporary suspension of activities in the vicinity of the discovery, protection of discovered remains, notification of NYSHPO and Indigenous representatives, and consultation regarding treatment of remains. The coroner and local law enforcement will make the official ruling on the nature of the remains, being either forensic or archaeological. A decision concerning avoidance or hand excavation of the burial and final disposition of the remains shall be made by consulting parties.

## Conclusion

To avoid impacts to unevaluated archaeological sites identified in the Phase IB survey, the Applicant has moved or modified Facility components. Areas within 50 feet of the nine sites have been completely avoided by the Facility's APE. As such, EDR recommends that all **BEGIN CONFIDENTIAL INFORMATION**  **END CONFIDENTIAL INFORMATION** unevaluated sites be fully avoided by the proposed Facility and is requesting concurrence from OPRHP on this recommendation.

To provide additional safeguards against the possibility that the proposed Facility might impact unidentified archaeological resources, EDR, on behalf of the Applicant, will prepare an UDP which will outline the steps for fielding unanticipated discoveries of cultural resources which may be encountered during construction of the proposed Facility.

If you have any questions/concerns or would like to discuss the information described herein, please contact me at [psittig@edrdpc.com](mailto:psittig@edrdpc.com) or (919) 919-7066 and/or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com) or (585) 752-6147.

Thank you very much for your time.

Sincerely,



Peter Sittig, MPS, RPA  
EDR Archaeology Project Manager

### Attachments:

Attachment A. Archaeological Sites Avoided by Facility Construction

### References

Advisory Council on Historic Preservation (ACHP). 2023. *Policy Statement on Burial Sites, Human Remains, and Funerary Objects*. Available at <https://www.achp.gov/sites/default/files/policies/2023-07/PolicyStatementonBurialSitesHumanRemainsandFuneraryObjects30June2023.pdf> (Accessed June 2024).

Environmental Design & Research, Landscape Architecture, Engineering, and Environmental Service, D.P.C. (EDR). 2024. *Phase IB Archaeological Survey, Agricola Wind Project, Towns of Venice and Scipio, Cayuga County, New York*. Report prepared for Liberty Renewables, Inc., by EDR, Syracuse, NY.

EDR. 2024a. 2024. *Phase IB Archaeological Survey Addendum Memo, Agricola Wind Project, Towns of Venice and Scipio, Cayuga County, New York*. Memo prepared for Liberty Renewables, Inc., by EDR, Syracuse, NY.

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New York State Office of Parks, Recreation and Historic Preservation (NYSOPRHP). 2024. Re: ORES, Agricola Wind Project, Towns of Moravia, Scipio and Venice, Cayuga County, NY. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS July 17, 2024.

New York State Office of Parks, Recreation, and Historic Preservation (NYSHPO). 2021. *New York State Historic Preservation Office Human Remains Discovery Protocol*. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY.

New York State Office of Parks, Recreation, and Historic Preservation (NYSHPO). 2005. *New York State Historic Preservation Office (SHPO) Phase I Archaeological Report Format Requirements*. On file, New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY. Available at <https://cris.parks.ny.gov/> (Accessed June 2024).

**Attachment A**

**Archaeological Sites Avoided by Facility Construction**

**This figure has been redacted from this publicly available report because it contains sensitive/confidential archaeological site information.**