



Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

October 21, 2019

Dr. Douglas Pippin
Archaeology Project Manager
Environmental Design and Research, D.P.C.
274 North Goodman Street
Rochester, NY 14607

Re: DEC
Coverdale Solar Construction Project - Oriden Power
Highbanks Road, Leicester, Livingston County, NY
19PR06165.002

Dear Dr. Pippin:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). The Archaeology Unit has reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to our concerns for potential impacts to Archaeological Historic/Cultural resources. They do not include comments pertaining to structural/architectural Historic/Cultural Resources. Please continue to consult with Mr. John Bonafide of the Technical Unit regarding potential concerns for above ground resources.

Based on available information, your project is located in an archaeologically sensitive area. Therefore, the OPRHP recommends that a Phase I archaeological survey is warranted and offers the following survey guidance:

Phase IB archaeological testing **IS** recommended for the locations of proposed roads, facilities, retention ponds/basins, drainage tiles, staging areas, parking lots, utility trenches over a foot wide, drainages over foot wide, and areas of grubbing and grading.

The OPRHP does **NOT** recommend Phase IB archaeological testing for areas for panel arrays, perimeter fencing and utility poles *if* their associated posts are driven into the ground and no grubbing or grading is involved. However, if the installation of the panel array supports, fencing or utility poles requires excavation or grubbing and grading then Phase IB archaeological testing is recommended.

If you consider the project area to be disturbed, documentation of the disturbance will need to be reviewed by the OPRHP. Examples of disturbance include mining activities and multiple episodes of building construction and demolition. Agricultural activity is not considered to be substantial ground disturbance and many significant sites have been identified in previously cultivated land.

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Documentation of ground disturbance should include a description of the disturbance with confirming evidence. Confirmation can include current photographs and/or older photographs of the project area which illustrate the disturbance (approximately keyed to a project area map), past maps or site plans that accurately record previous disturbances, or current soil borings that verify past disruptions to the land.

Please note that in areas with alluvial soils or fill, archaeological deposits may exist below the depth of superficial disturbances (such as pavement or even deeper disturbances), depending on the thickness of the alluvium or fill. Evaluation of the possible impact of prior disturbance on archaeological sites must consider the depth of potentially culture-bearing deposits and the depth of planned disturbance by the proposed project.

Also, please note that wetlands may have areas of higher elevation that were suitable for habitation and/or the staging of temporary resource procurement camps. In addition, past climatic variations or modern changes in hydrology may have inundated areas formerly available for occupation.

A Phase I survey is designed to determine the presence or absence of archaeological sites or other cultural resources in the project's area of potential effect. The OPRHP can provide standards for conducting cultural resource investigations upon request. Cultural resource surveys and survey reports that meet these standards will be accepted and approved by the OPRHP.

Our office does not conduct cultural resources surveys. A 36 CFR 61 qualified archaeologist should be retained to undertake the Phase I survey. Many archaeological consulting firms advertise their availability in the yellow pages. The services of qualified archaeologists can also be obtained by contacting local, regional, or statewide professional archaeological organizations. Phase I surveys can be expected to vary in cost per mile of right-of-way or by the number of acres impacted. We encourage you to contact a number of consulting firms and compare examples of each firm's work to obtain the best product.

Finally, please verify all state and/or federal agencies that are or will be involved in this project and from which you will be receiving permits, permissions and/or funding, and provide the OPRHP with the contact names and addresses, including email, for each involved agency.

If you have any questions, I can be reached at (518) 268-2218 or via e-mail at Josalyn.Ferguson@parks.ny.gov.

Sincerely,



Josalyn Ferguson, Ph.D.
Scientist Archaeology

via e-mail only

c.c. Charles Vandrei, DEC