



## Memorandum

**To:** Bradley W. Russell  
Historic Preservation Specialist, Archaeology  
New York State Historic Preservation Office

**From:** Andrea Zlotucha Kozub, RPA  
Project Manager, Cultural Resources  
Environmental Design & Research, D.P.C.

**Date:** July 24, 2024

**Reference:** North Seneca Solar Project  
22PR05554  
Matter No. 23-00036  
Revised Facility Layout

On behalf of North Seneca Solar Project, LLC (the Applicant), EDR conducted a supplemental Phase IB archaeological survey for the North Seneca Solar Project (the Facility) located in the Towns of Junius and Waterloo in Seneca County, New York. The purpose of this memorandum is to document the results of a supplemental survey conducted in response to proposed revisions to the Facility design (i.e., the layout).

The work was conducted in accordance with the New York Archaeological Council's *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State* (NYAC, 1994) and the New York State Historic Preservation Office's (NYSHPO) *Phase I Archaeological Report Format Requirements*, as appropriate (NYSHPO, 2005).

Consultation with NYSHPO since completion of the Phase IB archaeological survey has included:

- Submission of a *Phase IB Archaeological Survey* report on January 5, 2024 (EDR, 2024a). On February 2, 2024, NYSHPO concurred with EDR's recommendations and requested an archaeological site avoidance plan (NYSHPO, 2024a).
- Submission of an *Archaeological Avoidance Plan* on February 26, 2024 (EDR, 2024b) detailing how archaeological sites would be avoided by significant ground disturbance. On March 25, 2024, NYSHPO concurred with EDR's avoidance measures (NYSHPO, 2024b).

Subsequent to this correspondence with NYSHPO, the Applicant decided to investigate a layout modification for the Facility's substation and associated infrastructure, which would change the Limits of Significant Ground Disturbance (LSGD). EDR identified and tested 5.8 acres of previously

untested elevated archaeological sensitivity within the potential LSGD to provide the Applicant with flexibility in the siting of the substation and associated infrastructure.

EDR archaeologists conducted a supplemental Phase IB archaeological survey at this location from June 17-19, 2024. The supplemental survey area consisted of newly germinated corn fields and a fallow field with successional vegetation. Phase IB testing included a pedestrian survey of 2.6 acres within the corn fields and the excavation of 70 shovel test pits at 15-meter intervals within the fallow field. Areas of steep slope and existing utility corridors tested by previous archaeological surveys (C&A, 1990; E&A, 1999) were excluded from testing. Soils encountered during shovel testing typically consisted of a dark grayish brown (10YR 4/2) or brown (10YR 4/3) silt loam or silty clay loam plowzone overlying a variable, often oxidized, subsoil ranging from a light yellowish brown (10YR 6/4) to brown (7.5YR 5/3; 7.5YR 5/4) sandy loam, silty clay loam, or silty clay. No cultural materials were encountered during the supplemental Phase IB archaeological survey and no archaeological sites were identified. Mapping and photographs of the supplemental survey area are provided in Attachments A and B.

Based on these results, no previously unrecorded archaeological resources will be impacted by proposed revisions to the Facility layout in this location. EDR recommends no further archaeological testing is warranted for this part of the Facility Site.

If you have any questions or would like to discuss the information described herein, please contact me at [azlotuchakozub@edrdpc.com](mailto:azlotuchakozub@edrdpc.com) or (315) 246-5384.

Sincerely,



Andrea Zlotucha Kozub  
Project Manager, Cultural Resources  
Environmental Design & Research, D.P.C.

#### Attachments

- Attachment A: Results of Supplemental Phase IB Archaeological Survey
- Attachment B: Photographs

## References

Environment & Archaeology, LLC (E&A). 1999. *Stage IA and IB Archeology Report for Tennessee Gas Pipeline's 23 Mile Section 237 of the EEP 2000 Project, Mileposts 237-3+0.00 to 238-2+10.00, in Ontario, Seneca and Cayuga Counties*. Report prepared for the Federal Energy Regulatory Commission (FERC) by E&A, Florence, KY.

Environmental Design & Research, D.P.C. (EDR). 2024a. *Phase IB Archaeological Survey, North Seneca Solar Project, Towns of Junius and Waterloo, Seneca County, New York*. Prepared for North Seneca Solar Project, LLC by EDR, Syracuse, NY. January 5, 2024.

EDR. 2024b. *North Seneca Solar Project, Archaeological Avoidance Plan*. Prepared for North Seneca Solar Project, LLC by EDR, Syracuse, NY. February 26, 2024.

Collamer & Associates, Inc. (C&A). 1990. *MCI Telecommunications Corporation Lightwave System Fiber Optics Cable Route, Cultural Resources Survey, Volume I, Multiple Counties*. Report prepared for the Federal Communications Commission (FCC) by C&A, Albany, NY.

New York Archaeological Council (NYAC). 1994. *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State*. New York State Office of Parks, Recreation & Historic Preservation, Waterford, NY.

New York State Historic Preservation Office (NYSHPO). 2005. *New York State Historic Preservation Office Phase I Archaeological Report Format Requirements*. On file, New York State Office of Parks, Recreation & Historic Preservation, Waterford, NY.

NYSHPO. 2024a. Re: ORES, North Seneca Solar Project/105 MW/1909 Acres, 22PR05554. Review correspondence from Bradley W. Russell (NYSHPO) to Kristy Primeau (ORES). NYSHPO, Waterford, NY. Via CRIS, February 2, 2024.

NYSHPO. 2024b. Re: ORES, North Seneca Solar Project/105 MW/1909 Acres, 22PR05554. Review correspondence from Bradley W. Russell (NYSHPO) to Kristy Primeau (ORES). NYSHPO, Waterford, NY. Via CRIS, March 25, 2024.

This document contains critical infrastructure information, confidential commercial information, trade secrets, and/or proprietary information and as such is entitled to confidential treatment under Section 87(2) of the New York State Public Officers Law and the Commission's regulations (16 NYCRR 6-1). An unredacted version of this document has been submitted under separate cover pursuant to 16 NYCRR 6-1.4.

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# Attachment B. Photographs



**Photograph 1**

Representative view of corn field submitted to pedestrian survey. View to the east.



**Photograph 2**

Representative view of fallow field submitted to shovel testing. View to the west.

## North Seneca Solar Project

Towns of Junius and Waterloo, Seneca County, New York

*Supplemental Phase IB Archaeological Survey*