



**Environmental Design & Research,**  
Landscape Architecture, Engineering & Environmental Services, D.P.C.

217 Montgomery Street, Suite 1000, Syracuse, New York 13202  
P. 315.471.0688 • F. 315.471.1061 • www.edrdpc.com

## memorandum

**To:** Mr. Daniel Bagrow, NYSOPRHP      **EDR Project No:** 15033  
**From:** Nicholas Freeland  
**Date:** August 28, 2015  
**Reference:** Jericho Rise Wind Farm, Franklin County  
NYSOPRHP Project Review #07PR04701  
Phase 1B Archaeological Survey Work Plan

### Comments:

On behalf of Jericho Rise Wind Farm, LLC (the Applicant), Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR) is conducting cultural resources studies in support of environmental review and permitting for the Jericho Rise Wind Farm (the Project), located in the towns of Bellmont and Chateaugay, Franklin County, New York. The potential environmental impacts of the proposed Project are being reviewed under the State Environmental Quality Review Act (SEQRA) with the Towns of Chateaugay and Bellmont serving as Co-Lead Agencies. The SEQRA review of the Project began in 2007. EDR is preparing a Supplemental Environmental Impact Statement (SEIS) to build upon the information and analysis presented in the 2008 Draft Environmental Impact Statement (DEIS) that was previously prepared for the Project (Tetra Tech EC, Inc. [Tetra Tech], 2008a). This SEIS will address all changes to the proposed action that have occurred subsequent to the release of the DEIS, and includes additional studies and analyses. This Phase 1B archaeological survey work plan is intended to define an approach for evaluating the Project's potential effect on archaeological resources and to assist the New York State Office of Parks, Recreation, and Historic Preservation's (NYSOPRHP's) review of the Project. The current Phase 1B archaeological survey will serve as a complimentary study to a previous Phase 1B archaeological survey completed by Tetra Tech in 2008 (Tetra Tech, 2008b).

All cultural resources studies undertaken by EDR in association with the Project will be conducted by professionals who satisfy the qualifications criteria per the Secretary of the Interior's Standards for Historic Preservation (36 CFR 61). The archaeological survey will be conducted in accordance with the *New York State Historic Preservation Office Guidelines for Wind Farm Development Cultural Resources Survey Work* (the *SHPO Wind Guidelines*; NYSOPRHP,

2006) and applicable portions of NYSOPRHP's *Phase 1 Archaeological Report Format Requirements* (NYSOPRHP, 2005).

### Project Overview

Jericho Rise Wind Farm LLC (the Applicant), a wholly owned subsidiary of EDP Renewables, is proposing to construct a wind energy generation facility (and associated necessary Project infrastructure) in the Towns of Chateaugay and Bellmont in Franklin County, New York (Figure 1). The current Project Site includes approximately 5,895 acres of leased private lands that are roughly bound by State Route 11 to the north, the Chateaugay River to the east, Brainardsville Road to the south, and the Burke/Chateaugay town boundary to the west (Figures 1 and 2). The Project site consists of open fields, mature forests, areas of successional shrubland and wetlands, with elevations ranging between approximately 800 and 1,560 feet above mean sea level. Land use within the Project site is dominated by active and reverting agricultural land. With the exception of the villages of Chateaugay and Burke, to the northeast and west respectively of the Project site, the area surrounding the Project site is primarily undeveloped, with farms and rural residences interspersed along area roadways.

Review and revision of the Project layout has been ongoing during the SEQRA review of the Project. At the time the DEIS was completed, the proposed Project layout consisted of 53 wind turbine generators (WTGs) (Tetra Tech, 2008a). Subsequent to the release of the DEIS, the Project layout was further refined (in large part to avoid and/or minimize impacts to wetlands and other environmental factors) prior to Tetra Tech's Phase 1B archaeological survey (Figure 2). During the initial Phase 1B archaeological survey (Tetra Tech, 2008b) the project design consisted of a total of 47 proposed WTGs. Following the initial Phase 1B archaeological survey, additional project layout revisions occurred, and as presently envisioned, the Project will consist of up to 37 WTGs, each with a nameplate capacity of 2.1 megawatts (MW), for a total anticipated nameplate generating capacity of 77.7 MW. However, to allow for flexibility on final site selection, the Applicant is also evaluating and seeking approval for seven alternate WTG sites, for a total of 44 potential WTG locations.

The total project size is limited by the interconnection request approved by the New York Independent Systems Operator at 77.7 MW. The WTGs that will ultimately be constructed for the Project have not been determined. However, the largest WTGs presently being considered for the Project are the Gamesa G114-2.1 WTGs. For the purpose of presenting a conservative analysis, EDR's assessment of potential environmental impacts assumes that the Project will use Gamesa G114-2.1 WTGs. Each WTG consists of three major mechanical components: the tower,

nacelle, and rotor. Assuming use of the Gamesa G114-2.1 turbine, the anticipated tower height for the Project, or “hub height” (height from foundation to the rotor hub), is approximately 93 meters (305 feet). The Gamesa G114-2.1 has a rotor diameter of 114 meters (374 feet), resulting in a total height of 150 meters (492 feet).

All of the proposed turbines will be the same make and model. In addition to the WTGs, the Project will include construction and operation of one permanent meteorological (met) tower, a system of gravel access roads, electrical collection and communication cable networks, an operations and maintenance (O&M) facility (which will be constructed as an addition to the existing O&M building at the Marble River Wind Farm located immediately west of the current Project), a collection system substation, and a point of interconnection (POI) switchyard. The collection system substation and the POI switchyard will be collocated on a single parcel within the overall Project site. The Project will also require a temporary laydown yard and construction work space, including, but not limited to, areas to store Project components (laydown yards), construction vehicle parking areas, and cleared areas for turbine assembly (turbine workspaces). These Project components are described in greater detail below under the heading *Project’s Archaeological Area of Potential Effect (APE)*. The current Project layout and the DEIS Project layout are depicted in Figure 2.

The current Project Site is very similar to the Project Site previously identified in the original wind energy permit applications to the Towns and in the DEIS (and the initial Phase 1B archaeological survey report). There is significant overlap between the areas studied/identified in the DEIS as compared with the current Project layout. For example, 18 of the 44 proposed wind turbine locations are within 500 feet of the wind turbine locations proposed in the DEIS and 32 of the 44 proposed locations are within 1,000 feet of the wind turbine locations proposed in the DEIS.

However, there are some differences between the current Project layout and the DEIS layout. Generally, the changes in the Project since the DEIS relate to the deletion of turbines and the removal of the northeastern area of the Project. These differences are depicted in Figure 2 and summarized below in Table 1. Layout changes have been made primarily to accommodate the larger Gamesa G114 2.1 MW wind turbine, but also to accommodate study results, agency and landowner feedback. As indicated in Table 1, the Applicant is proposing the use of a taller WTG with a larger rotor diameter (relative to what was considered in the DEIS) to maximize energy production based on the site-specific wind resource analyses. Fewer turbines are proposed in the current layout as a result of the increased nameplate capacity of the larger WTG.

**Table 1. Comparison of DEIS and SEIS Project Layouts**

Project Component	Current (SEIS) Project Layout	2008 (DEIS) Project Layout
Wind Turbine Model	Gamesa G114-2.1 2.1 MW Hub Height: 93 meters (305 feet) Rotor Diameter: 114 meters (374 feet) Total Height: 150 meters (492 feet)	Vestas V-82 1.65 MW Hub Height: 80 meters (262 feet) Rotor Diameter: 82 meters (269 feet) Total Height: 121 meters (397 feet)
Number of Wind Turbines	37 (+7 alternates = 44)	53
Number of Met Towers	1	4
Length of Access Roads	10.3 miles (+2 miles for alternates)	15 miles
Length of Collection Lines	17.2 miles (+3.7 miles for alternates)	21 miles

Project's Area of Potential Effect (APE)

A project's archaeological APE is defined as those areas where soil disturbance is proposed to occur during construction. The descriptions below characterize the anticipated limits of soil disturbance for each proposed Project component (see Figure 2), which cumulatively make up the Jericho Rise Wind Farm's archaeological APE. For purposes of describing the APE, the areas of disturbance listed below represent the temporary extent of soil disturbance anticipated to occur during Project construction and do not represent permanent soil disturbance associated with the Project. Note that archaeological survey will be conducted concurrently with wetland survey and delineation and that a limited number of proposed Project components will likely be moved following these surveys to reduce impacts to wetlands and archaeological sites.

- **Wind Turbines.** A 250-foot radius around each of the 37 proposed turbine sites and seven proposed alternate turbine sites will be temporarily stripped of topsoil and graded to create a workspace for turbine assembly and erection. This will result in soil disturbance of approximately 4.5 acres per turbine.
- **Access Roads.** The Project is proposed to include approximately 10.3 miles of gravel-surface access roads and 2 miles of gravel-surface alternate access roads. The maximum width of temporary soil disturbance for access road construction will be 54 feet. Existing farm lanes and woods roads will be used wherever practical to minimize new ground disturbance and vegetation clearing.
- **Improvements to Public and Private Roads.** The project will require the temporary expansion and improvement of public and private roads associated with turning radii and road expansions. The proposed impacts associated with improvements to public and private roads totals approximately 9.2 acres and the total proposed impacts associated with alternate improvements to public and private roads totals approximately 1.6 acres.

- **Collection Lines.** The Project is proposed to include approximately 17.2 miles of buried collection lines and 3.7 miles of alternate buried collection lines. Buried collection lines will be installed within a trench three to four feet-deep, and will require a construction corridor with a maximum width of 35 feet of soil disturbance.
- **Meteorological Tower.** One permanent meteorological tower is proposed for the Project and its construction is conservatively assumed to result in up to 1 acre of soil disturbance.
- **Laydown Yard.** One staging area/laydown yard up to 10 acres in size is proposed for the Project. Construction of the staging area will include stripping/stockpiling topsoil, grading and compacting the subsoil, and installation of geotextile fabric and gravel.
- **Substation/Switchyard.** The Project will require one collection system substation and one POI switchyard to allow connection to the existing power grid. These facilities will be collocated at a single location adjacent to the existing Willis Substation in the Town of Chateaugay. Construction of these facility is anticipated to disturb approximately 2.1 acres at a single location.
- **O&M Building.** The Project will require one O&M building which will be constructed as an addition to the existing O&M facility for the nearby Marble River Wind Farm. John Milner Associates, Inc. (JMA) conducted a Phase 1B archaeological survey for the Marble River Wind Farm in 2007 (JMA, 2007).

Based on these impact assumptions, the Project's archaeological APE is 383 acres in size. Note that this represents the total areas that will be temporarily disturbed by construction. Following construction, the operating Project is anticipated to have a permanent footprint that is significantly smaller and the remaining portions of the APE will be restored to current use.

#### Previous Archaeological Surveys

Tetra Tech conducted a Phase 1A cultural resources survey in 2007 (Tetra Tech, 2007) and an initial Phase 1B archaeological survey for the Project in 2008 (Tetra Tech, 2008b). This survey was conducted subsequent to the completion of the DEIS for the Project, and it is EDR's understanding that the survey report was never submitted to NYSOPRHP. During the survey, Tetra Tech calculated the archaeological APE of the Project to be 211 acres (see Table 1) actually surveyed 216.6 acres through the excavation of 3,455 shovel test pits (STPs) and the pedestrian surface survey of 0.67 acres. The survey effort is shown in reference to the current Project design in attached Figure 3. The initial Phase 1B archaeological survey identified five historic archaeological sites (A0.03303.000041, A0.03308.000053, A0.03308.000054, A0.03308.000055, A0.03308.000056), all of which were recommended as not

eligible for listing on the National Register of Historic Places (NRHP) with no further work. The current Project Layout is sited to avoid all impacts to these sites.

EDR prepared a comparison of the revised Project layout with the earlier Project layout that was current at the time that the initial Phase 1B archaeological survey was conducted for the Project (Table 2). The Project now consists of three fewer potential turbines. It should be noted that the length of proposed collection lines summarized by Tetra Tech (2008b) includes only those proposed lines not collocated with proposed access roads, whereas the length of proposed collection line included for the current layout includes all proposed lines. Furthermore, under the category of “alterations and improvements to intersections and culverts on existing public roads” Tetra Tech listed no acreage known at the time of the initial Phase 1B survey, but this acreage is now known and included in the “Improvements to Existing Public and Private Roads” category for the current supplemental Phase 1B survey. Overall, the current layout will disturb approximately 383.3 acres; 166 acres more than the area subject to the initial Phase 1B survey (Tetra Tech, 2008b). It is worth noting that the Project has not actually increased in size since 2008. Rather, the 2008 Phase 1B survey was based on the level of detail concerning the proposed Project layout at that time.

**Table 2. Previous Archaeological Survey Project Layout Comparison.**

Project Element	Initial Phase 1B Survey (2008) Project Layout (Tetra Tech, 2008b)	Initial Phase 1B Survey (2008) Archaeological APE (acres) (Tetra Tech, 2008b)	Current Supplemental Phase 1B Survey (2015) Project Layout	Current Supplemental Phase 1B Survey (2015) Archaeological APE (acres)
Turbines	47	47	44	193.3
Met Tower	2	2	1	1
Laydown Yard	1 (includes O&M building)	15	1	10
O&M Building	Included in Laydown Yard	Included in Laydown Yard	Located at Existing O&M Facility for Nearby Marble River Wind Farm	Located at Existing O&M Facility for Nearby Marble River Wind Farm
Collection System Substation and POI Switchyard Facilities	2	16	1	2.1
Access Roads	13.5 miles	91.9	12.3 miles	81.0
Collection Lines	9.2 miles (solo interconnect only)	39.0	20.9 miles	85.1
Improvements to Existing Public and Private Roads	Undetermined	Undetermined	10.8 acres	10.8
Total Acreage	N/A	210.9	N/A	383.3

### Additional Archaeological Survey Work Plan

The supplemental archaeological survey work for the Project will be conducted in accordance with the *SHPO Wind Guidelines*, which specify an archaeological testing methodology that intensively samples selected areas within the

larger Project Area. The amount of archaeological survey work conducted (i.e., the number of shovel tests excavated) was determined based on the total area of anticipated ground disturbance (archaeological APE). The *SHPO Wind Guidelines* are based on the assumption that additional archaeological survey work is not necessary if Project components move around during the Project development process, as long as the total area of ground disturbance for the Project does not increase. As mentioned previously, the number of proposed turbines, length of access roads, and length of underground interconnects have all changed since the initial Phase 1B archaeological survey (Figure 2). Based on these revision, the archaeological APE has increased by approximately 172.4 acres.

#### *Scope of Supplemental Proposed Phase 1B Archaeological Survey*

The current Project archaeological APE is 383.3 acres. The archaeological APE at the time of Tetra Tech's 2008 Phase 1B archaeological survey was 210.9 acres, or 172.4 acres less than the current archaeological APE. However, Tetra Tech (2008b) surveyed approximately 216.6 acres during their initial Phase 1B archaeological survey, or 166.7 acres less than the current archaeological APE. Therefore, the current Phase 1B archaeological survey methodology proposed by EDR is intended to account for this remaining 166.7 acres. The *SHPO Wind Guidelines* (NYSOPRHP, 2006), suggest a standard testing rate of 16 STPs per acre of project APE. It is currently estimated that approximately 50% of the archaeological APE occurs in agricultural fields suitable for pedestrian survey, so EDR is proposing to conduct approximately 83.4 acres (i.e., 50% of 166.7 acres) of pedestrian survey in agricultural fields and to excavate approximately 1,334 STPs (i.e., 50% of 166.7 acres x 16 STPs per acre) in areas not suitable for pedestrian surface survey (see *Archaeological Research Design* section below).

#### *Field Methods*

The archaeological APE for the Project includes active agricultural lands (including pastures, corn and hay fields), open meadows, forested/shrubland areas, and steeply sloped areas (i.e., areas in excess of 12% slopes per the New York Archaeological Council's [NYAC] Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State [the NYAC Standards; NYAC, 1994]). Following previously used fieldwork methods, it is anticipated that EDR's additional archaeological survey work in these areas will consist of the following:

- **Corn fields.** In existing corn fields and/or previously cultivated areas with greater than 80% ground-surface visibility, EDR personnel will conduct a pedestrian surface survey to determine whether archaeological sites are present (in accordance with the NYAC Standards; NYAC, 1994). In these areas, EDR personnel will

traverse the archaeological APE along transects spaced at 3 to 5-meter intervals while inspecting the ground surface for artifacts and/or archaeological features. The timing for this work is critical because surface survey needs to be conducted after a field has been freshly plowed and disked, and preferably following a rain event. If any artifacts or other indication of an archaeological site is observed on the ground surface, then the location of all finds will be recorded using sub-meter accuracy Global Positioning System (GPS) equipment. After recording the locations of all artifacts and/or features in a given area, EDR personnel will collect observed artifacts for subsequent laboratory identification and analysis, in accordance with standard archaeological methods.

- **Hay fields, forests, and shrubland.** In selected areas not suitable for pedestrian surface survey, EDR personnel will excavate STPs to determine whether archaeological sites are present. STPs will be excavated along transects or in grid patterns at five-meter intervals within selected areas to provide. STPs excavated for the Project will be 30-50 cm in diameter and excavated to sterile subsoil or the practical limits of hand excavation (in accordance with the NYAC Standards; NYAC, 1994). Field notes for each STP will be recorded on standardized forms that describe soil stratigraphy, record whether any artifacts were recovered, and note any other relevant observations. All soils excavated from STPs will be screened through 0.25-inch hardware cloth. If prehistoric Native American artifacts are recovered from an isolated STP, then up to eight additional STPs will be excavated at one-meter and three-meter intervals around the original STP to determine whether the artifacts represent an isolated find or may indicate the presence of a more substantial archaeological site.
- **Steeply sloped areas.** No systematic archaeological survey work is proposed in steeply sloped areas (per the NYAC Standards; NYAC, 1994). In these areas, archaeological survey work will be restricted to pedestrian walkover supplemented by judgmental shovel testing if indications of a potential archaeological site are observed (e.g., foundations, structural remains, or rock overhangs suitable for use as shelters).

#### *Landscape Classification GIS Model*

Tetra Tech (2008b) performed a GIS-based landscape classification analysis for the Project site in accordance with the *SHPO Wind Guidelines*. The landscape classification identified environmental strata (local habitats) within the Project following the example set forth in the New York State Museum Bulletin entitled *Archaeological Investigations in the Upper Susquehanna Valley, New York State* (Funk, 1993a; 1993b). Tetra Tech also digitized the locations of over 440 buildings and farmsteads within the Project site and vicinity to obtain approximate geographic coordinates for map-documented structures potentially located in the APE and vicinity.

The following explanation of the landscape classification analysis methodology is excerpted from Tetra Tech (2008b:2-1):

In essence, the GIS analysis overlaid the shapefile, or georeferenced digital representation of the Project design [layout], on the other datasets representing local terrain and habitats to determine the APE's acreage and its proportionate distribution relative to the habitats. The local habitat shapefile was produced during the Phase 1A archaeological investigation, while shapefiles representing local terrain and other features were derived from U.S. Geological Survey 1:24,000 scale quadrangle maps or other sources available through the New York State GIS Clearinghouse. In addition, Tetra Tech's GIS Analysts georeferenced the locations of over 440 buildings and farmsteads within the Project site and vicinity to obtain approximate geographic coordinates for map-documented structures potentially located in the APE and vicinity.

The Project site is situated on the escarpment between the Adirondack Mountains to the south and St. Lawrence River to the north. According to Tetra Tech's (2008b) landscape classification analysis, the Project site occupies the following local habitat types in Funk's (1993b) terms:

1. Till Plains
2. Channelways
3. Stratified Drift Terrain

The resulting landscape classification for the Project as defined by Tetra Tech in 2008 (Tetra Tech, 2007; 2008b) indicated that a total of 3,208 STPs needed to be excavated for the Project. Tetra Tech (2008b) actually excavated a total of 3,455 STPs due to various conditions encountered in the field and archaeological sites discovered during the survey.

#### *Proposed Supplemental Archaeological Survey Research Design*

The locations of areas selected for intensive archaeological sampling within the remaining archaeological APE for additional survey will be made on a judgmental basis in the field under the direction of a Registered Professional Archaeologist. Selection of locations for shovel testing will prioritize areas of high sensitivity for historic or prehistoric archaeological sites within or adjacent to proposed Project components. High prehistoric archaeological sensitivity will

be assigned to areas with little to no slope, moderate- to well-drained soils, and close proximity to water sources. High historic archaeological sensitivity will be assigned to areas of the APE in close proximity to map-documented structures (MDS) that were digitized by EDR from the 1858 Taintor and Dawson *Map of Franklin County*, the 1876 Beers *Franklin County Atlas*, the 1915 USGS *Chateaugay* 1:62500 scale Topographic Quadrangle, and the 1964 USGS *Brainardsville* 1:24000 scale Topographic Quadrangle. These MDS locations are depicted in the attached Figure 4. EDR noted a total of 117 MDS within or immediately adjacent to the Project site. Of these, 26 occur within or immediately adjacent to proposed Project components (i.e., the Project APE) (see Figure 4). Furthermore, additional survey will focus on areas not previously sampled by Tetra Tech (2008b).

#### *Reporting and Delivery of Electronic Data*

Results of the supplemental Phase 1B archaeological survey will be summarized in an illustrated report prepared in accordance with the *SHPO Phase 1 Archaeological Report Format Requirements* issued in April 2005. NYSOPRHP Archaeological Site Inventory Forms will be prepared for any archaeological sites identified during the survey, if necessary. In accordance with the *SHPO Wind Guidelines*, EDR will also provide GPS points for any sites identified during the supplemental Phase 1B survey and GIS data locating the boundaries of all archaeologically tested areas.

#### Conclusions and Recommendations

EDR compared the revised Project layout with the previous cultural resources studies conducted for the Jericho Rise Wind Farm in 2007-2008. The revised Project layout increases the archaeological APE of the Project by approximately 172 acres. Consequently, the previously conducted Phase 1B archaeological survey work associated with the previous Project layout (Tetra Tech, 2008b; see Figure 4) does not adequately cover the current layout's archaeological APE. The Phase 1B survey effort up to this point has included the survey of approximately 216.6 acres of the archaeological APE through a combination of pedestrian surface survey and shovel testing.

Therefore, EDR currently proposes to conduct intensive Phase 1B archaeological survey that will include pedestrian surface survey at 5-meter (15-foot) intervals in cultivated areas and STPs excavated in 5-meter (15-foot) intervals within discrete survey areas distributed throughout the archaeological APE. In total, EDR anticipates the Phase 1B survey will include approximately 83.4 acres of pedestrian surface survey and 1,334 additional STPs. EDR proposes to focus this investigation in part on the 23 MDS/historically sensitive areas that occur within or adjacent to currently proposed Project components (Figure 4). It is EDR's opinion that this proposed fieldwork, in addition to fieldwork

already completed by Tetra Tech (2008b), will comprise an adequate effort of Phase 1B archaeological survey under the SHPO *Wind Guidelines* (NYSOPRHP, 2006) for the Jericho Rise Wind Farm as it is currently proposed.

#### NYSOPRHP Concurrence with Work Plan

EDR has already initiated the archaeological survey and has provided this work plan to NYSOPRHP to confirm the archaeological APE for the Project and to ensure that the proposed scope of additional survey is consistent with NYSOPRHP's expectations. Please provide a formal response indicating NYSOPRHP's concurrence with and/or comments on the work plan described herein.

If you have any questions or would like to discuss the work plan proposed herein, please contact Patrick Heaton at [pheaton@edrdpc.com](mailto:pheaton@edrdpc.com) or Nicholas Freeland at [nfreeland@edrdpc.com](mailto:nfreeland@edrdpc.com), or by phone (for both) at (315) 471-0688.

#### **ATTACHMENTS**

- Figure 1. Regional Project Location.
- Figure 2. Project Layout Comparison.
- Figure 3. Revised Project Layout with Tetra Tech's 2008 Initial Phase 1B Archaeological Survey Areas.
- Figure 4. Revised Project Layout with Historically Sensitive Areas.

#### **References**

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**Copies To:** C. Calabrese, A. Branam (EDPR); file.