



**Archaeological Resources
Unanticipated Discovery Plan**

Saratoga Solar Project
Wood County, Wisconsin

Docket #: 9816-CE-100

Prepared for:

Saratoga Solar Project, LLC

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1.0 Introduction

This document outlines the procedure that Saratoga Solar Project, LLC (Saratoga Solar) will follow to prepare for and address any unanticipated discoveries of cultural resources, including archaeological sites and possible human remains. It provides direction to Saratoga Solar personnel and contractors regarding procedures to follow in the event that unanticipated discoveries are made during the construction of the Saratoga Solar Project (Project). If an unanticipated discovery is made during any task associated with construction of the Project, including ground-disturbing activities, Saratoga Solar and its contractors will treat the find as a potentially significant resource and avoid additional disturbance of the find until a significance recommendation is made by the On-Call archaeologist.

This Unanticipated Discovery of Archaeological Resources Plan (or Plan) outlines notification procedures for the unanticipated discovery of archaeological resources and human remains within the project area. Proper implementation of this plan will assist the Project with complying with applicable state and federal statutes and policies regarding the protection and treatment of cultural resources that may qualify as “historic properties” and human remains. Historic properties are significant cultural resources that are listed in or eligible for listing in the National Register of Historic Places.

Stantec conducted an initial cultural resources database review, created an archaeological site probability model, and conducted field investigations to identify cultural resources present within the Saratoga Solar Project Boundary. The results of the cultural resources database review indicated that one archaeological survey was conducted within the Project boundary. No archaeological resources or historic structures are within the Project boundary, or a 0.25-mile buffer.

This Project is not located on publicly managed lands and federal regulations (i.e. National Historic Preservation Act or Native American Graves Protection Act) are not applicable to the Project. Therefore, this plan is designed to comply with industry best practice and Wisconsin law

2.0 Construction Supervisor and Contractor Training

Prior to the commencement of construction, the On-Site Construction Supervisor and Contractor personnel will receive environmental training, which will include guidance on identifying potential cultural materials and human remains. The orientation will consist of two parts. The first part will provide training in the recognition of both prehistoric and historic cultural resources and human remains and is briefly described below. The second part will provide the chain of communication and protocols that must be followed if unanticipated cultural resources or human remains are discovered during construction

The following definitions will guide Saratoga Solar and its contractors in the implementation of this Plan:

- **Archaeological Resources:** The physical remains of past human activity that are at least 50 years of age. Archaeological resources can include building foundations, cisterns, wells, or concentrations of artifacts (see definition below).
- **Artifact:** Any object made or used by people and that is over 50 years old or older. Artifacts can include (but are not limited to) bricks, nails, broken dishes, bottles, animal bones, oyster shell, and Native American artifacts such as pottery and arrowheads.
- **Deposits:** Below-surface concentrations of artifacts or other structural or infrastructural features as described above under the definition for Archaeological Resources.
- **Historic Site Survey Inventory-Eligible:** An archaeological resource determined through consultation with the State Historic Preservation Office (SHPO) to be historically significant. Significant resources have the potential to yield information important to Wisconsin's history or prehistory.
- **Remains:** Under this Plan, remains are defined as all human remains or portions thereof regardless of age or cultural affiliation. All work must stop at that location upon discovery of human remains.
- **Unanticipated Discovery:** Archaeological resources and human remains which may be impacted during construction within the project area but show no evidence of their presence at the surface.

An archaeological resource discovery could consist of, but is not limited to:

- Prehistoric features such as storage pit features, postmolds, hearths, occupational surfaces, middens, and anthropogenic soil horizons;
- Prehistoric artifact concentrations such as projectile points and waste flakes/debitage;
- Historic features such as trails, roads, canals, wells, cisterns, foundations, and trash pits at least 50 years in age; and
- Historic artifact concentrations such as glass bottles, tin cans (e.g., hole-in-top cans), tableware, dishware, architectural debris (e.g., bricks, mortar, window glass), hardware (e.g., square nails), and farm implements at least 50 years in age.

Evidence of a burial site could consist of, but is not limited to:

- Any human remains including articulated or disarticulated bones, teeth, hair, preserved soft tissue, etc.;
- Burial pit or grave shaft outlines in the soil;
- Headstones or footstones; and
- Coffin wood fragments and coffin hardware.

3.0 Unanticipated Discovery of Cultural Materials Overview

If a potential unanticipated discovery is made during construction the following steps shall be taken.

1. The Contractor will cease work immediately within the area of the find to avoid disturbing the find and will immediately notify the On-Site Construction Supervisor. No cultural material will be transported from its original location.

On-Site Construction Supervisor:	TBD
Cell phone number:	TBD
Email:	TBD

2. The On-Site Construction Supervisor will immediately notify the Saratoga Solar Project Manager of the find. The call will be followed up by an email notification summary to the Saratoga Solar Project Manager.

Saratoga Solar Project Manager:	TBD
Cell phone number:	TBD
Email:	TBD

3. Cessation of ground-disturbing activity will encompass a sufficient area to protect the discovery itself and provide a buffer zone for adequate and safe investigation of the discovery and any other features or artifacts that may be associated with the discovery. The buffer zone will be fenced or delineated with signage by the On-Site Construction Supervisor to prevent further disturbance by vehicle and foot traffic. A general guideline is to create a buffer of at least 100 feet (ft) around the discovery. The fenced or signed area can be larger or smaller depending on the Project area boundary in order to protect the discovery adequately without unnecessary hindrance to construction, if appropriate. No fencing or signage will be installed outside of the construction workspace without prior approval from the landowner.
4. The On-Site Construction Supervisor will take photographs of the find, including photographs of artifacts, features, and general landscape in the vicinity of the find. NOTE: DO NOT TAKE PHOTOGRAPHS OF HUMAN REMAINS. Additionally, the On-Site Construction Supervisor will provide a description of the discovery and note the location. This information will be provided by email to the Saratoga Solar Project Manager and the On-Call Archaeologist. The On-Call Archaeologist will meet the Secretary of Interior's Professional Qualification Standards as described in 36 CFR 61. Following notification, construction may resume outside of the 100-ft (or greater as necessary) buffer surrounding the find.

On-Call Archaeologist

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5. The On-Call Archaeologist will determine whether the find was recorded during a previous survey. If the find is determined to be within a previously identified site area that has been determined as not eligible for listing in the National Register of Historic Places (NRHP), the On-Site Construction Supervisor will notify the construction contractor that construction activities may resume after the fencing or signage is removed.
6. If the find is discovered in an area where a site was not previously recorded, the On-Call Archaeologist, will review the location and type of discovered material. If the discovery is determined to be non-cultural, the On-Site Construction Supervisor will notify the Contractor that construction may resume. The On-Call Archaeologist will submit a letter report regarding the discovery and findings to the Saratoga Solar Project Manager within 5 business days.
7. If on-site assessment of the find's significance is necessary, the On-Call Archaeologist will mobilize to the site within 1 day of notification.
8. During the on-site assessment, if the On-Call Archaeologist determines the find is not significant or has been completely disturbed by construction activities, then the On-Call Archaeologist will document the find and inform the On-Site Construction Supervisor that construction can resume. The On-Call Archaeologist will also notify the Saratoga Solar Project Manager that construction can proceed.

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9. If the On-Call Archaeologist determines that the discovery constitutes human remains, the procedures described in Section 4.0 of this plan will be followed.
10. If the On-Call Archaeologist determines that the discovery represents a significant find, the On-Call Archaeologist will notify Saratoga Solar Project Manager the same day and the procedures in Section 5.0 of this plan will be followed. The On-Call Archaeologist will notify the Saratoga Solar Project Manager of any significant discoveries by telephone and follow up by email.
11. Saratoga Solar or its representative will notify the landowner of the significant find as appropriate.

4.0 Unanticipated Discovery Notification Process: Human Remains

Although unlikely, there is the potential for the discovery of either Native American or Historic period human remains and funerary objects during construction. These steps shall be followed if human remains are discovered:

STEP 1: DISCOVERY - WORK STOPS

- When unidentified bones are discovered during construction activities, the On-Site Construction Supervisor shall stop work at that location immediately and secure the discovery location from further disturbance. Vehicles, equipment, and unauthorized personnel will not be permitted to traverse the stop-work area until notified by the On-Site Construction Supervisor. Do not call 911 (unless there is an actual emergency warranting such action) or speak with the media. Work may continue in other areas.

STEP 2: MANAGER NOTIFIES SARATOGA SOLAR

- The On-Site Construction Supervisor shall notify the Saratoga Solar Project Manager and the On-Call Archaeologist immediately upon learning of the discovery.

STEP 3: DETERMINE NATURE OF THE FIND

- The On-Call Archaeologist will determine if the unidentified bone(s) are animal or human remains.
- If animal, the area is to be documented as an unanticipated archaeological discovery and work is allowed to continue after appropriate consultation with SHPO.
- In the event that the unidentified bones cannot be identified as animal or human, the Saratoga Solar Project Manager or On-Call Archaeologist shall contact the Wood County Medical Examiner for assistance with the identification.

STEP 4: SARATOGA SOLAR NOTIFIES THE WOOD COUNTY SHERIFF'S OFFICE, MEDICAL EXAMINER, AND SHPO

- If the On-Call Archaeologist determines that human remains have been located, the On-Call Archaeologist shall immediately notify the Saratoga Solar Project Manager and request an immediate suspension of all ground-disturbing activities.
- The Saratoga Solar Project Manager shall take immediate steps to minimize impacts on the human remains.
- The Saratoga Solar Project Manager shall immediately notify the Wood County Sheriff's Office, Medical Examiner, and SHPO of the discovery and ensure that all ground-disturbing activities are halted in the vicinity of the discovery.
- The Wood County Medical Examiner will determine who has jurisdiction over the remains. The Saratoga Solar Project Manager shall relay pertinent details of the discovery such as the presence of coffins or coffin hardware that allows the Medical Examiner to complete its obligations under applicable laws.
- If the Medical Examiner determines that the human remains are not subject to criminal investigation by local or federal law enforcement authorities, Saratoga Solar shall comply with applicable federal and state laws and regulations governing the discovery and disposition of human remains.

STEP 5: MEDICAL EXAMINER DETERMINES SHPO HAS JURISDICTION

- If the location is not a crime scene, the Medical Examiner will turn over jurisdiction to the SHPO within 72 hours. Saratoga Solar will continue to suspend all ground-disturbing activities at the location.
- Saratoga Solar will coordinate with SHPO to ensure that the provisions of Wis. Stats. 157.70 are implemented. This may include obtaining additional permits and procedures necessary to comply with state law and administrative code.

5.0 Unanticipated Discovery Notification Process: Archaeological Resources

If an unanticipated discovery of archaeological resources (artifacts, deposits, etc.) is made, follow the procedures outlined directly below.

STEP 1: DISCOVERY - WORK STOPS

- In the event that a construction activity encounters archaeological artifacts, deposits, or features, collectively known as archaeological resources, the On-Site Construction Supervisor shall immediately stop work in the area of the archaeological resource(s) upon notice of the unanticipated discovery. Work may continue in other areas.
- The area of the discovery shall be treated as potentially significant and kept intact by Saratoga Solar and its contractors until a formal determination of significance is made. Protection of the archaeological resource(s) shall be implemented immediately.

STEP 2: MANAGER NOTIFIES NG RENEWABLES

- The On-Site Construction Supervisor shall notify the Saratoga Solar Project Manager and the On-Call Archaeologist immediately upon learning of the discovery.

STEP 3: SARATOGA SOLAR ARRANGES FOR INITIAL FIELD EVALUATION

- The Saratoga Solar Project Manager shall coordinate with the On-Call Archaeologist to determine if field documentation of the resource is necessary. Field documentation include determining its nature and probable age and, when possible, an initial evaluation of the significance of the archaeological resource(s). The On-Call Archaeologist will record the archaeological resource(s) in writing and with appropriate photographs and drawings as detailed in the Resource Documentation Protocols section of this document.

STEP 4: SARATOGA SOLAR INITIATES SHPO CONSULTATION

- Upon completion of initial documentation of the resource, the Saratoga Solar Project Manager shall notify SHPO to initiate expedited consultation.

STEP 5: SARATOGA SOLAR DIRECTS DETERMINATION OF ELIGIBILITY

- If, based on the initial resource documentation, SHPO and Saratoga Solar agree that the archaeological resource(s) is ineligible for inclusion listing in the Wisconsin State Register of Historic Places, the Saratoga Solar Project Manager shall prepare a record of the determination and the undertaking may proceed.
- If SHPO and NG Renewables agree that the archaeological resource(s) is eligible for inclusion in the Wisconsin State Register of Historic Places, Saratoga Solar shall minimize impacts to the eligible resource(s) (including avoidance, if possible) and shall mitigate remaining impacts through the implementation of a Data Recovery Work Plan.
- Saratoga Solar shall engage a qualified professional archaeologist to prepare a Data Recovery Work Plan for submittal to SHPO for review and comment.
- Upon acceptance of the Data Recovery Work Plan by SHPO, Saratoga Solar may proceed to implement the Data Recovery Work Plan in compliance with Wisconsin archaeological guidelines.

6.0 Resource Documentation Protocols

Saratoga Solar has prepared these resource documentation protocols to identify actions that Saratoga Solar and the On-Site Construction Supervisor will take in the event that an unanticipated archaeological resource is discovered during construction. Possible unanticipated archaeological discoveries could include concentrations of Native American artifacts, farmstead foundations, cisterns, wells, and historic artifacts deposits. When an unanticipated archaeological discovery is made during construction activities, the first step that the On-Site Construction Supervisor will take is to review the proper procedures as outlined in this plan.

The following Documentation Protocols detail proposed level of and methods for the field documentation of the resource, artifact analysis, and final documentation of the event that is to be filed with SHPO. All investigations are to be conducted in compliance with the Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation* (Federal Register 1983) and Wisconsin's *Guide for Public Archaeology in Wisconsin* (Dudzick et al. 2012).

In the event that any artifacts, features, structural remains, or elements not discussed in this Resource Documentation Protocols section are located during construction, the On-Site Construction Supervisor will cease all work in the immediate vicinity of the find and contact Saratoga Solar. Saratoga Solar will then notify and consult with the On-Call Archaeologist and SHPO on the appropriate treatment and documentation of the find.

Artifact Deposits and Structural Remains

Saratoga Solar recognizes the potential for the presence of artifacts, Historic period and Native American, and structural remains to be present within the Project area. Saratoga Solar will focus on documentation and recovery of artifact concentrations for Native American and Historic period artifacts. Single Historic period items, especially of poorly known context, will not be documented or recovered. All Native American artifacts will be documented and recovered. Potential artifact concentrations include building demolition debris, bottle dumps, other historic artifact deposits, and concentrations of Native American artifacts.

Historic artifact deposits can include (but are not limited to) kitchen-related and personal items ranging from broken dishes to buttons and shoes. Native American artifacts are often difficult to identify but include such things as stone tools (projectile points, scrapers, drills, etc.), pottery fragments, fire-cracked rock, and stone tool manufacturing debris.

When uncovered, the On-Site Construction Supervisor stops work, notifies the Saratoga Solar Project Manager and On-Call Archaeologist. The Saratoga Solar Project Manager, assisted by the On-Call Archaeologist, will determine if additional documentation and consultation with SHPO is necessary.

Human Remains

When human remains are located (regardless if the remains are modern, Historic, or Native American), the first step taken by the On-Site Construction Supervisor is always to stop work and inform NG Renewables, the Wood County Sheriff's Office, and the Wood County Medical Examiner.

Modern - Modern human remains will typically be on or just below the surface with no indications of the presence of a coffin. If modern human remains are uncovered, stop work and immediately contact Saratoga Solar, the Wood County Sheriff's Office, and the Wood County Medical Examiner. This is a potential crime scene. Saratoga Solar is restricted in conducting work until the area is released by the County Medical Examiner.

Historic and Native American Human Remains - Historic period buried human remains will most likely be skeletal elements that are associated with a coffin or coffin furniture (metal parts of a coffin left after the wood has decomposed). Native American buried human remains will most likely be poorly preserved skeletal elements with no coffin or coffin furniture present. The remains may be positioned in any number of ways, but typically not prone. If Historic period or Native American buried human remains are uncovered, the On-Site Construction Supervisor must stop work and immediately contact Saratoga Solar, the Wood County Sheriff's Office, and the Wood County Medical Examiner. The Saratoga Solar Project Manager, assisted by the On-Call Archaeologist, will notify SHPO. Saratoga Solar is restricted in conducting work until the area is released by the County Medical Examiner.

After release of the location by the Wood County Sheriff's Office and Wood County Medical Examiner, and assuming that the remains have not been collected, the archaeologist will coordinate the recovery of the remains in consultation with the Wisconsin SHPO. Saratoga Solar will apply for a *Request to Disturb a Burial Site* permit under Wis. Stats. 157.70. The nature of recovery efforts will be specified by the Wisconsin SHPO as a condition of the permit.

The Wisconsin SHPO will field-verify that proper documentation has been conducted within 24 hours of notification by Saratoga Solar of completion of field recovery prior to resumption of construction activities. Once completed, archaeologist informs Saratoga Solar and the Wisconsin SHPO that all necessary documentation has been completed and that work may resume.

Structural Remains and Artifact Concentrations

NG Renewables recognizes the potential for the presence of artifacts, Historic and Native American, to be present on the surface or in the uppermost soil horizons. NG Renewables will focus on documentation and recovery of artifact concentrations for Native American and Historic period artifacts. Single Historic period items, especially of poorly known context, will not be documented or recovered. All Native American artifacts will be documented and recovered. Potential artifact concentrations include building debris or structural remains, bottle dumps, other historic artifact concentrations, and concentrations of Native American artifacts.

Building Debris or Structural Remains – Typically this category will consist of deposits of disarticulated bricks or structural remains such as building foundations. The archaeologist photographs the debris and plots the location of the find on a Project plan map. If structural remains are found, the archaeologist takes descriptive measurements as needed (length, width, etc.) and plots the location of the find on a Project plan map.

Native American or Historic Period Artifact Concentrations – Native American artifacts are often difficult to identify but include such things as stone tools (projectile points, scrapers, drills, etc.), pottery fragments, fire-cracked rock, and stone tool manufacturing debris. Concentrations of Historic period artifacts can include kitchen-related and personal items ranging from broken dishes to buttons and shoes.

The archaeologist will photograph and take measurements of the area of artifact concentration (length, width, etc.), and plot the location of the find on a Project plan map. The archaeologist will excavate one or two shovel test pits within the limits of the artifact concentration to determine whether there is a potential for the presence of artifact deposits below the plow zone. Shovel test pits will measure 50-x-50 centimeters and excavations will proceed in 10-centimeter levels with all soils screened through ¼-inch mesh. Vertical stratigraphic profiles will be drawn and photographed, and appropriate documentation of the vertical profile will be completed.

Artifact Analysis

If artifacts are collected, the items will be cleaned, inventoried, and analysed. The artifacts will be labeled and packaged in accordance with Wisconsin's *Guide for Public Archaeology in Wisconsin* (Dudzik et al. 2012). Based on the type of artifacts recovered (i.e., Historic period or Native American), the On-Call Archaeologist will select an appropriate artifact analysis regime. In general, the analysis will identify artifact types and time periods of manufacture. The results of the artifact analysis will be reviewed and organized to address Project goals and will be documented in an Investigative Report. These materials will be stored during the Project in a climate controlled and secure archaeology laboratory and will be transferred, along with any digital files such as photographs, GPS and GIS files, and artifact databases, among others, to SHPO upon completion of the Project.

Additional Documentation

In the event of an unanticipated discovery, Saratoga Solar will consult with SHPO to determine if an Archaeological Site Form needs to be completed. Upon completion of all Project ground-disturbing activities, the On-Call Archaeologist will prepare an Investigative Report that documents the results of monitoring and all unanticipated discoveries. This report will be prepared in accordance with Wisconsin's *Guide for Public Archaeology in Wisconsin* (Dudzik et al. 2012).

7.0 Contact List

Wood County Medical Examiner
715-421-8702

Wood County Sheriff's Office
[\(715\) 884-6596](tel:7158846596)

Wisconsin Historical Society State Historic Preservation Office

Kimberly Cook – Contact for human remains find
(608) 264-6493

kimberly.cook@wisconsinhistory.org

Leslie Eisenburg – Contact for archaeological find
(608) 264-6507

leslie.eisenberg@wisconsinhistory.org

On-Site Construction Supervisor

TBD

Saratoga Solar Project Manager

TBD

On-Call Archaeologist

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