

# Appendix 28

December 9, 2022  
(sent via email)

**Subject:** Progress report for Phase 1A/Partial Phase 1B

Dear Ms. Haubenreich:

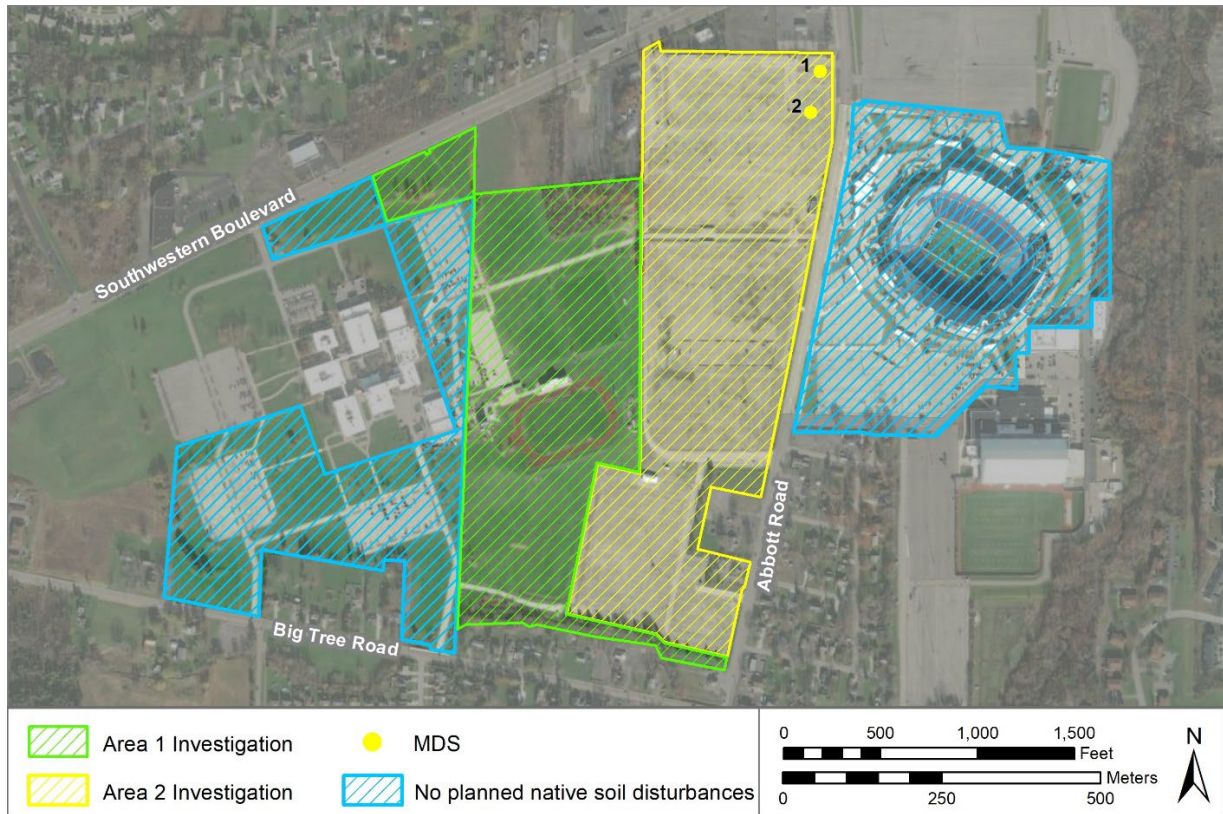
The Buffalo regional office of Commonwealth Heritage Group, Inc. (formerly Panamerican Consultants; Commonwealth) would like to report on the progress of the Phase 1A/1B investigation for the new Bills Stadium project.

SHPO has accepted the draft of the Phase 1A report submitted in November. The oral history section of the Phase 1A is still in the process of being drafted.

Commonwealth is aware of the latest SHPO memo dated 11/22/2022. The necessary next steps for the requests enumerated in that memo will be discussed this month with an aim of having protocols in place before the second round of Phase 1B work.

Field work is currently in a hiatus due to inaccessibility of the grounds during the Bills season. As of the end of September 2022, a 15 m (50 foot) grid of shovel test pits (STPs) has been excavated across the testable extent of Area 1 (Figure 1). This is a standard testing interval with the STPs ranging in 30 to 50 cm (12 to 20 inches) in diameter and extending no more than 1 meter (3.3 feet) deep. All excavated soils were screened through ¼-inch hardware cloth and results recorded on shovel test record forms. This portion of the investigation was completed in 10 field days under good weather conditions and was monitored by a representative from the THPO's office.

In total 456 STPs and three 50 cm x 50 cm (20 in x 20 in) deep tests were dug in the testable green spaces. The areas excluded from hand testing were the track and soccer fields, parking lots, areas obviously built up beyond testable limits (i.e. push piles), and buildings. No standing water or drainage issues impeded testing. The three 50 cm x 50 cm (20 in x 20 in) tests were excavated in the southern section of Area 1 to determine if drainage mitigations had been put in that area for the maintenance of the baseball diamonds that used to be there. Thirteen of the STPs were positive for cultural materials. This number may change after an analysis of the materials and their soil context is complete.



**Figure 1. Proposed Areas of archaeological investigation for the New Bills Stadium. A 15 m (50 foot) testing interval was done across Area 1 in September 2022.**



**Photo 1. Representation of the typical conditions for the September 2022 field work.**