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Via email: info@gallooislandwind.com

Cat Mosley
Public Affairs Manager
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RE: Galloo Island Wind Farm (the "Project")
Preliminary Scoping Statement dated June 2016 (the "PSS")
PSC Case Number 15-F-0327
CMBK File No: 38854.0104

Dear Ms. Mosley:

We are the attorneys for the Village of Sackets Harbor and its Planning Board (collectively the "Village") and offer on their collective behalves the following comments concerning the recently filed PSS referenced above.

The Village's major areas of concern regarding the Project and the PSS are the potential impacts the Project will have on the Village as follows:

1. Transportation and parking;
2. Invasive species;
3. Emergency services; and
4. Cultural, Coastal and Historic resources

The Village strongly feels that to minimize potential negative impacts on the Village, its inhabitants, guests and resources, that not only should these areas be addressed in the PSS and Application, but also in forming conditions imposed by the Siting Board in approving the Application. Therefore, the Village strongly disagrees with the first paragraph on Page 2 and Section 2.2 of the PSS, regarding the adverse potential impacts of off-site ancillary features on the mainland, as they cannot adequately be addressed under current state and local laws and regulations.

The Village is a small community of about 1,500 residences and the major economic forces in the Village are tourism and hospitality. The Village is situated on the shores of Lake Ontario, and has two protected harbors and municipal and private facilities for embarking from the mainland into the navigable waters of Lake Ontario. Its streets are not designated for heavy traffic flows, repetitive heavy loads or oversized and overweight loads. There are no traffic control devices in the Village other than stop signs at intersections. The Village owns and maintains waterfront parks with deep water dockage and two boat launches, which are actively used by residents and guests



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to the Village. The parking that supports these facilities is located in the heart of the downtown area, which borders the harbor. It and the Village's historic resources are the major reasons tourists are drawn to the Village. The use of the Village's core as an "ancillary feature" to this Project would be absolutely unacceptable, even though it is open and free to the public. The Village would want a condition to the Article 10 permit that this area of the Village may not be used in support of the Project. The current proposed points of embarkation and disembarkation are acceptable and should be part of the Application and a condition of any Article 10 permit granted. As part of the Application, the Project sponsor should set forth a Village's approved detailed site plan for parking on Madison Barracks with predicted traffic flows, timing based upon projected with real work sequences and frequency schedules. Compliance with the detailed plans and a restriction that no street in the Village may be used as a haul route should be made a condition of any Article 10 permit issued by the Siting Board.

One potential ancillary concern using the Village as the point of departure and arrival by boat of the workers is the spread of pale swallow-wart to the Village. Galloo Island is infested with this invasive species. Therefore, part of the Application should include an invasive species control plan and be a condition of the Article 10 permit. The control plan should also set protocols for insuring workers and equipment to not carry any portion or seeds of pale swallow-wart to the Village inadvertently.

As your local representatives are aware, the Village provides Fire Protection, Emergency Medical Services and Ambulance Services to the Town of Hounsfield through the Village's Fire Department. Due to the Project's location on Galloo Island and the fact that the Village's Fire Department does not possess any boats or aircraft, providing fire, emergencies, medical and ambulance services to the Project site presents unique challenges. The Village believes that as part of the Application and conditions to any Article 10 Permit issued, there must be plans for fire protection, safety, security and emergency services that have been approved by and coordinated with the Village Board of Trustees and the Fire Council of the Village's Fire Department. These should include a division of responsibilities with appropriate covenants between the owners of the Project and the Village's Fire Department and Village. In addition, the Plan should provide for the transportation of sick and injured persons from the Project site to the appropriate medical facilities on the mainland.

The Village believes the PSS to be deficient in addressing the proposed projects potential impacts on cultural, historic and coastal resources and the manner or methods to mitigate or offset the adverse visual and practical impacts on those resources of immense value to the Village. The PSS recites that the Applicant will consult with and coordinate with New York State Department of State Office of Parks, Recreation and Historic Preservation for conducting the necessary studies and analysis of visual impacts and offset measures on historic properties and resources. There is no mention of said coordination and consultation with the Village. As mentioned previously, the Village historic and coastal assets are its most important physical resources and assets. Therefore, it only seems appropriate that the Applicant also consult with the Village regarding those studies and analysis. The proposed project differs from the previous Galloo Island Wind Farm proposal in one material respect. The new proposal towers are 164 feet taller than those previously proposed. Therefore, the visual impact on mainland historic resources is greater and more

prevalent. In addition there has been a new site placed in the area on the National Register of Historic Places since the original Galloo Island Wind Farm proposal. The Village desires to be consulted on and coordinated with the proposed visual impact studies prior to the Application being finalized. For reference, please find attached the relevant portions of the NYDEC and Town of Hounsfield SEQR Findings Statements for the much shorter previously proposed wind towers on Galloo Island. Obviously, the Village desires as a condition of the Article 10 permit, the required offset measures pursuant to Section 106 of the National Historic Preservation Act be coordinated with the Village.. The Environmental Impact and Findings Statement for the previous Galloo Island Wind Farm, not only addressed the States Coastal Management policies, but also those of the Village contained in its state approved local Waterfront Revitalization Program. The Village believes the Application needs to address all of the Project's impacts in light of its Local Waterfront Revitalization Program.

Finally, it should be noted that the proposed source of the location of municipal boundaries are inaccurate as listed in Section 2.3(b) of the PSS. The accurate municipal boundaries are set forth in the original legislation creating the townships and referral should be made to the Legislative Acts for accurate boundaries.

Please feel free to contact the undersigned at (315) 778-1645 for coordination in arranging for consultations with the appropriate Village officials and consultants.

Very truly yours,

CONBOY, MCKAY, BACHMAN & KENDALL, LLP


Dennis G. Whelpley

DGW/ljm
Enclosures

CC: Hon. Kathleen H. Burgess, Secretary
Service List
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Kris Dimick, P.E.
Vincent Battista, Mayor
Hon. Janet Quinn, Planning Board Chair

**NEW YORK STATE DEPARTMENT OF
ENVIRONMENTAL FINDINGS STATEMENT**

DATED MARCH 3, 2010

Beach, Southwick Beach, and Sackets Harbor Battlefield) all have one or more features where the visual environment is an important element of the visitors' experience. Westcott Beach (12.4 miles) and Southwick Beach (13.3 miles) provide for visual overlook and interpretation (though it should be noted that at Southwick Beach, the overlook already provides a direct view to the Nine Mile Point Nuclear Power Plant). Robert Wehle Park includes two overlook locations with a relatively close mainland view (5.6 miles) to Galloo Island. Sackets Harbor Battlefield State Historic Site includes a view to Galloo Island, although from a far background distance of more than 12 miles. In addition to the resources identified by OPRHP, the SHPO, the Town of Hounsfield and the Village of Sackets Harbor also identified the historic Madison Barracks complex as an inventoried visual resource with a direct, albeit distant, view to Galloo Island (13.4 miles).

DEC concurs that, at the inventoried resources identified above with visibility to the project, the change in the visual setting created by the project may detract from public enjoyment of those features where the view to the horizon on Lake Ontario is an important component (overlooks and historic settings). This impact is most pronounced at the Sackets Harbor Battlefield Historic Site and Madison Barracks. These sites use the existing vista looking out to Galloo Island as part of their historic museum programs. The visible turbine field will be an additional modern visual element in the background of this existing vista. Although this feature will alter the landscape on the horizon, it is not the first, and would not be the only, modern alteration that has occurred at these historic settings. The view from these locations includes other modern elements such as modern watercraft on the lake, residential development across Black River Bay in the Town of Brownfield, with both daytime and nighttime visibility, new residential development contiguous to the battlefield site including nighttime street lighting and modern transportation features within the battlefield.

DEC also recognizes that the proposed wind power project development differs from other development activity in that the turbines are required to be removed, and the resulting views to Galloo Island will revert to its prior condition, if and when the project is decommissioned. In this sense, the change in visual setting may be considered long-term – possibly twenty to forty years, but temporary when considered against the full sweep of time that this historical viewshed has existed.

The Galloo Island Lighthouse was also identified as a listed historic resource which will experience a direct foreground view to the project. While it is clear that the viewshed at the lighthouse site will be dramatically altered, the site is currently in private ownership, does not have approved public access, and is not located on any designated scenic transportation routes, other than recreational boat traffic on the lake. Therefore, although the magnitude of the change in visual setting is large at this location, the impact to the public is very small, especially when compared to the number of visitors to mainland resources such as the Sackets Harbor Battlefield and the Madison Barracks sites.

2) Impacts to historic resources are closely related to the visual impact assessment, since properties listed or eligible for listing in the State and National Registers of Historic Places are included on the list of “inventoried” visual resources in the DEC visual policy. The June 23, 2009 SHPO letter (FEIS Appendix Q) determined that approximately 238 resources listed or eligible for listing on the State or National Registers of Historic Places are located within the area surveyed in accordance

with that agency's guidelines.¹¹ Within the survey area, SHPO identified several key receptors where visual impacts should be carefully assessed. These include the Galloo Island Lighthouse Complex, the Sackets Harbor Battlefield, the Madison Barracks Complex, and the Sackets Harbor Village Historic District. The SHPO indicated that the visual assessment provided in the DEIS sufficiently assessed these resources. The SHPO's assessment concluded that, although the full extent of potential impacts for the proposed undertaking cannot be assessed absent the as of yet unsubmitted survey data for the transmission line portion of the project, sufficient information does exist to determine that under 36CFR Part 800.5(v) the undertaking will have an adverse effect on cultural resources.

3) A Phase IB Cultural Resources Investigation involved surface inspection and shovel testing in selected portions of the project area designed to meet the requirements of the SHPO for surveys of archeological resources. No prehistoric artifacts were found on Galloo Island. Four historic sites were identified and all were associated with the discovery of partial structures or foundations. The proposed project layout avoids three of these sites. One of the sites is at the site of the proposed permanent boat slip; therefore this site cannot be avoided by project re-design.

b. Discussion and Findings.

1) The Project Sponsor has explored means to minimize visual impacts including assessing potential options for camouflage or disguise including a review of different colors for the WTGs, and minimizing FAA-required lighting. However, direct mitigation of visual impacts from the project is difficult, particularly at this project site which, as the SHPO has pointed out, is unlike previously evaluated wind farm projects, being sited on an island in the midst of open water, with a much higher visibility potential than previously reviewed mainland based projects. DEC's Visual Policy states that after all traditional mitigation strategies have been employed staff should pursue offsets and decommissioning to help achieve the balancing required by SEQR. Correction of an existing aesthetic problem identified within the viewshed of a proposed project or enhancing the setting may qualify as an offset or compensation for residual project impacts, after traditional mitigation measures have been applied. The notion here is to improve the experience of visitors at these sites by enhancing their visual and interpretive elements.

Since practicable means to further mitigate these distant views have not been identified, DEC has evaluated potential visual offset mitigation proposals provided by OPRHP and the Town of Hounsfield/Village of Sackets Harbor. These are included in Appendix Q of the FEIS. DEC has determined that the following proposed offset measures will create a net visual improvement, will add to the visitors' experience and appreciation of the resources, and are therefore the preferred mitigation offsets.

- Sackets Harbor Battlefield State Historic Site. OPRHP recently acquired 40 waterfront acres of the original War of 1812 Battle of Sackets Harbor battlefield site. Plans are underway to open the new property to visitors and to provide improved access and interpretation. A new interpretive plan to incorporate the new acquisition into the existing Battlefield storyline and define appropriate interpretive media will be developed. New walking trails, with design and fabrication of new directional and interpretive signage, will be required. A new, permanent

¹¹ New York State Historic Preservation Office. *New York State Historic Preservation Office Guidelines for Wind Farm Development Cultural Resources Survey Work*. March 8, 2006. <http://www.nysparks.com/shpo/environmental-review/documents/CulturalResourceSurveyGuideWindProjects.pdf>.

archaeology exhibit will be developed in the Historic Site's farmhouse to chronicle the archaeology work that has been conducted at this archaeologically rich property over the past decades. Visitors to the Sackets Harbor Battlefield State Historic Site will be able to enjoy an improved experience at the battlefield notwithstanding the far distant view of the turbine field on Galloo Island.

- Pickering Beach Museum. Located adjacent to the Sackets Harbor State Historic Site near Lake Ontario, the Museum is in the Village Core National Register Historic District, Sackets Harbor Heritage Area and Sackets Harbor Local Waterfront Revitalization Program area. With the assistance of New York State and the Sackets Harbor Historical Society, the Village completed a major restoration of the house. However, there was not sufficient funding to complete renovation of the cottage and much needed work on the extensive collection. Completion of this project would improve the visual setting at the Battlefield site by restoring a deteriorated historic structure and enhance the interpretive experience for visitors.
- Robert G. Wehle State Park. Project work would include improvements to picnic areas and amenities along the scenic bluffs on Lake Ontario, trail improvements, attention to ADA requirements, and directional and interpretive signage. New interpretive themes to be addressed and interpreted include the extensive military history of the park, geology, natural history, and resource management (in particular invasive species such as swallow-wort). Here again, visitors to Robert G. Wehle State Park will be able to enjoy an improved visitor experience along the shoreline of the park notwithstanding the far distant view of the turbine field on Galloo Island.
- Stone Hospital at Madison Barracks. Located overlooking Lake Ontario (with a direct line-of-sight to Galloo Island), the Stone Hospital is in the Madison Barracks National Register Historic District, Sackets Harbor Heritage Area and Sackets Harbor Local Waterfront Revitalization Program area. With funding from New York State and private foundations, significant progress has been made to restore the exterior masonry structure and the imminent threat of collapse of this historic building has been averted. But substantial work still remains, including replacement of the roof and complete renovation of the interior. When completed, the Stone Hospital will house a Military Heritage Center which will provide an enhanced interpretive experience at this historic structure within the viewshed.
- Westcott Beach State Park. The park's scenic overlook provides a commanding and sweeping view of Lake Ontario. The existing panoramic interpretive signage that interprets this view is proposed to be re-done to include the Hounsfield Wind Farm as a new feature in this viewscape. Upgrades to the landscape and hardscape at this site, plus continuing maintenance such as tree trimming, will improve and preserve public access to this scenic overlook, thereby improving the net visual and interpretive experience at the site.

DEC will require, as a condition of permits issued for construction of the wind generation project, that the Project Sponsor develop a visual impact offset mitigation plan that includes the offset mitigation activities identified above, or an alternative of greater or equal significance that meets DEC Visual Policy qualifications for visual offsets.

2) Because the project requires permits from the U.S. Army Corps of Engineers (USACE), the project is subject to review under Section 106 of the National Historic Preservation Act. As stated

above, the June 23, 2009 SHPO letter (FEIS Appendix Q) determined the undertaking will have an adverse effect on cultural resources. Based on SHPO's determination that the project may result in an adverse effect, the Project Sponsor will enter into a Memorandum of Agreement ("MOA") with SHPO and the USACE as part of the Section 106 process. With respect to visual impacts to historic structures/properties, as stated in the SHPO letter, direct impact mitigation of impacts to these resources is not feasible. Therefore, alternative offset mitigation is proposed. The Project Sponsor is proposing to provide funding for one or more of the following projects suggested by the Town (Included in Appendix Q of the FEIS) to be included in the MOA prepared pursuant to the Section 106 process:

- Renovation and restoration of National Register of Historic Places Listed ("NRL") District Schoolhouse #19 located in the Sulphur Springs Cemetery, Hounsfield, New York.
- Repair and restoration of the NRL Sulphur Springs Cemetery, Hounsfield, New York.
- Repair and restoration of the Lakeside Cemetery, Hounsfield, New York.
- Repair and restoration of the Military Cemetery, Village of Sackets Harbor, New York.
- Upgrades to historic exhibits at the East Hounsfield Library, Hounsfield, New York.
- Production and installation of historic markers at historic locations in the Village of Sackets Harbor and Town of Hounsfield, New York.
- Renovation and preservation of the Pickering Beach Cottage Museum, Hounsfield, New York.
- Restoration and preservation of historically significant exhibits for the Pickering Beach Cottage Museum, Hounsfield, New York.
- Repair of the Sackets Harbor Bank Building, Sackets Harbor, New York.
- Rehabilitation and restoration of Stone Hospital, Sackets Harbor, New York.

DEC notes that this discussion of mitigation related to Section 106 above is appropriate under SEQR only for the limited portion of the project subject to SEQR review, and does not result from a full analysis of impacts associated with the entire undertaking, i.e., the transmission line. Any further discussion of avoidance or reduction of adverse effects can only be undertaken after the full survey information for the proposed transmission portion of the undertaking is submitted to the parties involved in the Section 106 process and the full scope of the affects on historic/cultural resources is assessed for the entire undertaking.

3) A letter from SHPO, dated April 8, 2009 (FEIS Appendix Q), recommended that each of four identified archeological sites be avoided, as they may contribute to the ability to interpret the history of the island, but if at any of these sites avoidance is not feasible, the SHPO recommended that a Phase II investigation be conducted. Three of the four sites have been avoided. DEC will require a Phase II investigation be conducted at the proposed boat slip location prior to construction as a condition in DEC permits for the project. In addition to providing the basis for historical off-set

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DATED JANUARY 6, 2010

example, motorboats can be seen in the photos of current conditions prepared for the Project application in addition to roads and roadside steel guard rails among others, thereby minimizing the potential impact to the Battlefield. More importantly, as detailed in Section 5.14 of this Findings Statement, the off-set projects proposed by the Project Sponsor will minimize the impact to historic structures and will ensure that the historic character of the Village remains intact. Thus, the Planning Board finds that the benefits of the Project (including the other local tax and economic benefits and contribution to the State energy policies) outweigh the potential visual impact.

5.14 Archeological and Historic Resources

5.14.1 Potential Impacts

The Project Sponsor undertook a number of studies to assess the historic and archeological resources of Galloo Island and the potential impact on culturally significant resources in the surrounding area. In particular a Phase 1A Cultural Resources Investigation (Appendix I of DEIS), a Phase 1B Historic Building Survey of the Ten-Mile Area of Potential Effect (“APE”) for the Proposed Wind Farm Galloo Island (Appendix K of FEIS), and a Phase 1B Cultural Resources Investigation (Appendix K of FEIS) were conducted by Panamerican Consultants Inc. The methodology of each study was reviewed and approved by the New York State Office of Historic Preservation, (SHPO) and were designed to comply with the SHPO Guidelines for Wind Farm Development Cultural Resources Survey Work (2006).

The purpose of the Phase 1A Cultural Resources Investigation was to identify previously recorded cultural resources (i.e., archaeological or historic sites) and to evaluate the potential for previously unrecorded cultural resources to occur within the Project Site. The Phase 1A contained a preliminary architectural reconnaissance survey which identified the potential for impacts on cultural resources. Based on the results of the Phase 1A, it was determined that a Phase 1B be conducted for the Project’s potential impact on archeological sites. The Phase 1B Cultural Resources Investigation (archeological) involved surface inspection of 370 acres of Galloo Island and 5,939 shovel tests in the most sensitive historic locations. The investigation was conducted in compliance with SHPO guidelines as well as according to the New York Archaeological Council’s Standards for Archaeological Investigations. No prehistoric artifacts were found on Galloo Island. However, four historic sites were identified based on the discovery of partial structures or foundations.

On April 8, 2009, the State Historic Preservation Office (“SHPO”) recommended that each of four indentified archeological sites be avoided, as they may contribute to the ability to interpret the history of the island. (SHPO’s letter is in Appendix K of the FEIS). SHPO further recommended that if avoidance was not feasible that each site have a Phase II investigation. The Project Sponsor agreed to avoid three of the sites. The one site that cannot be avoided by the Project Sponsor is at the location of the proposed slip. To meet the requirements of SHPO, the Project Sponsor will be undertaking a Phase II investigation at the one location that cannot be avoided. The scope of the Phase II investigation has been approved by SHPO and is included in Appendix K of the FEIS.

Generally, the Phase II will consist of the removal and cataloguing of any artifacts prior to installation of the Project components.

In order to assess the potential impact to culturally significant resources on the island and the mainland, the Project Sponsor conducted a Historic Structure Survey for the 10-mile Area of Potential Effect. For many wind farm Projects in New York, a 5 mile APE is standard. However, because of the unique location of the Project, the Project Sponsor agreed to a more conservative 10 mile APE for the Survey. The Survey included sections of the Towns of Hounsfield, Henderson, Brownville, Lyme and Cape Vincent in Jefferson County, New York. The survey methodology was developed in consultation with SHPO.

Approximately 238 resources listed or eligible for listing on the State or National Registers of Historic Places were identified within the survey area (including the former coast guard station and lighthouse on Galloo Island). In a letter dated June 23, 2009, SHPO specifically identified several historically significant resources they may be impacted by the Project: the Galloo Island Lighthouse Complex, the Sackets Harbor Battlefield, the Madison Barracks Complex, and the Sackets Harbor Village Historic District. SHPO indicated that the visual assessment provided in the DEIS sufficiently assessed these resources. However, SHPO concluded under the standard established pursuant to Section 14.09 of the New York State Parks and Recreation Law and Section 106 of the National Historic Preservation Act (not SEQRA) that the Project would have an "Adverse Impact" within the APE surveyed due to the visual impact of the turbines on the recreational shoreline vistas and historic resources, albeit at a distance of 10-13 miles. This determination by the SHPO is a jurisdictional trigger under the Federal Law for further study, which the Project Sponsor conducted and included in the SEQRA analysis as well as its report to the SHPO under Section 106 of the National Historic Preservation Act. In addition, the FEIS states that "The visible turbine field will forever (or until any decommissioning may occur) alter what has been a largely intact historic vista for more than two centuries." SHPO concluded that "Given the unique circumstances associated with this portion of the Project (turbine field development) we see no reasonable way in which the affects associated with the construction of these units on Galloo Island can be avoided or minimized through layout alteration or unit number reduction."

No historic structures will be demolished or physically altered in connection with construction or operation of the Project. However, the viewshed maps prepared as part of the Project's Visual Impact Assessment (maps reflecting the viewshed of the final Project layout are included in the Appendix to the DEIS and Appendix of the FEIS) clearly indicated that the Project will be visible from the Sackets Harbor Battlefield and Madison Barracks. Due to the presence of these sites within the viewshed, it is possible that the Project will result in an adverse visual impact to of these sites.

5.14.2 Mitigation

As previously stated, the Project may result in temporary or permanent impacts to archaeological resources. However, the potential for impact has been minimized to the greatest extent practicable. Based on the determination regarding archeological resources on the island, the Project Sponsor relocated WTG 3 to avoid one of the identified

archeological sites. The laydown areas associated with the temporary dock was also relocated to avoid the edge of an area near another identified archeological site. One archeological site cannot be avoided and will be subject to a Phase II investigation prior to construction. The methodology for this Phase II investigation is included in Appendix K of the FEIS. In addition, based on SHPO's determination that the Project may result in an adverse effect, the Project Sponsor will be entering into a Memorandum of Agreement ("MOA") with SHPO and the USACE as part of the Section 106 process. In addition to providing the basis for historical off-set projects, the Memorandum of Agreement will contain an Avoidance Plan which will include a number of measures to ensure protection of archeologically sensitive resources such as:

- Temporary fencing will be installed demarking a 50-foot buffer from the archeological sites and marked with signs indicating "Sensitive Area/No Access".
- Final construction plans will include a notation regarding the avoidance measures for the archeological areas.
- The preconstruction meeting will include a discussion regarding the avoidance measures for the archeological areas.
- The SHPO Human Remains Discovery Protocol will be included in the construction plans for the Engineer-in-Charged in the unlikely event that human remains are encountered during construction.
- The SHPO Plan for Unanticipated Discoveries will be included in the construction plans for the Engineer-in-Charge.

With respect to visual impacts to Historic structures/properties, as stated in the SHPO letter dated June 23, 2009 direct impact mitigation of impacts to these resources is not feasible. Therefore, alternative offset mitigation is proposed. The Project Sponsor is proposing to provide funding for the following projects suggested by the Town (Included in Appendix Q of the FEIS:

- Renovation and restoration of Nation Register of Historic Places Listed ("NRL") District Schoolhouse #19 located in the Sulphur Springs Cemetery, Hounsfield, NY
- Repair and restoration of the NRL Sulphur Springs Cemetery, Hounsfield, NY
- Repair and restoration of the Lakeside Cemetery, Hounsfield, NY
- Repair and restoration of Military Cemetery, Village of Sackets Harbor, NY
- Upgrades to historic exhibits at the East Hounsfield Library, Hounsfield, NY
- Production and installation of historic markers at historic locations in the Village of Sackets Harbor and Town of Hounsfield, NY
- Renovation and preservation of the Pickering Beach Cottage Museum, Hounsfield NY
- Restoration and preservation of historically significant exhibits for the Pickering Beach Cottage Museum, Hounsfield, NY
- Repair of the Sackets Harbor Bank Building, Sackets Harbor, NY
- Rehabilitation and restoration of Stone Hospital, Sackets Harbor, NY.

Based on the typical MOA for wind farms in New York, it is proposed that the Project Sponsor would contribute to a Historical Resources Fund in an amount consistent with

other wind farm Projects reviewed by SHPO. The Town would control expenditures of the Historic Resources Funds and prioritize needs from the list of projects included in the MOA with the advice and recommendations of the Town Historian and SHPO. The establishment of the Historic Resources Fund would provide the Town flexibility to seek matching funds or contributions from other sources and stretch their restoration dollars. The Town could also invest these funds and expand the value of the Historic Resources Fund over time.

5.14.3 Conditions

The Project shall comply with all mitigation measures and offsets identified above. The Project Sponsor must undertake the Phase II investigation at the location of the historic resource site that will be disturbed for construction of the slip. The Project Sponsor will also enter into a Memorandum of Agreement for the establishment of an Historical Resources Fund for the historical off-set mitigation projects.

5.14.4 Findings

With regard to archeological impacts, the Project has avoided potentially sensitive archeological sites to the extent practical. For the one identified location where potentially sensitive archeological resources may exist, the Project Sponsor has agreed to perform a Phase II assessment. Additionally, the Project Sponsor has agreed to an Avoidance and Discovery protocol to ensure that any archeological resources are preserved.

The Project will result in potential, unavoidable visual impacts to certain historic and architectural resources because of the height of the towers. The Planning Board finds that there will be an impact to the historic viewshed from the Madison Barracks, Sackets Harbor Battlefield and to a lesser extent to the Sackets Harbor Historic District. However, the Planning Board finds that the Madison Barracks, Sackets Harbor Battlefield and the Historic District are not surrounded by a pristine historical environment but rather is situated in the midst of community with many modern features. To the east of the Battlefield is a housing subdivision. There are other modern encroachments as well including fences, roads, lighting and cars either in or adjacent to the Battlefield. In this context the introduction of distant views of this wind farm are not inconsistent with the existing landscape surrounding the Battlefield Park and the Historic District. As such the Project does not impair or detract from the essential functions of these resources.

Moreover, the Project Sponsor has minimized potential impacts to the maximum extent practicable with the implementation of the identified mitigation measures and proposed offsets set forth above. The off-set projects proposed by the Project Sponsor will significantly benefit the historic character of the Village of Sackets Harbor and the Town of Hounsfield and outweigh the potential impact associated with the far distant background views from the mainland to the wind farm. In addition, the identified potential impacts to historic properties are outweighed by the socioeconomic and environmental benefits of providing a source of clean, renewable energy, as well as adding to the local tax and economic base. In light of these considerations, the Project

avoids and/or minimizes potential significant adverse impacts to historical, cultural and archaeological resources to the maximum extent practicable by incorporating, as conditions to this Findings Statement, the mitigation measures identified herein.

Finally, with regard to historic resources on Galloo Island (the coast guard station and lighthouse), there will be clear views from these resources to the wind farm. However, these locations are in a state of disrepair and provide little historic value to the Town of Hounsfield due to their limited accessibility to the public and remote location on Galloo Island. The Planning Board finds that the off-set projects proposed by the Project Sponsor to improve and enhance historic locations within the Town are clearly more beneficial than rehabilitation of sparsely used and distant historic resources on Galloo Island.

5.15 Socioeconomics

5.15.1 Potential Impacts

The Project Sponsor evaluated socioeconomic impacts as a result of the Project, and provided specific information regarding population, economy and employment, and tax revenues.

The Project will have both direct and indirect positive impacts on the town, county and school district. Positive impacts to the local economy are anticipated from employment of approximately 200 workers required during construction, and up to 24 full time employees. The DEIS estimates that the anticipated labor for on-site construction and installation cost is approximately \$64 million during the construction period and based on certain multipliers can be expected to generate approximately \$106 million for the local economy. Additionally, a positive impact will result from \$2.14 million in annual payments in lieu of tax (PILOT) revenue anticipated to be split between local taxing jurisdictions.

The construction and operation of the wind farm is not likely to generate a significant increase in the population of the town or county. The addition of 24 full-time workers is not likely to add a significant number of students to the local school districts. This is a minor positive impact from the construction of the Project. There will not be negative impacts to local demographics or local business.

During construction there will be an increase in the boat traffic utilizing this portion of Lake Ontario. This increase in traffic will not preclude the recreation use of the lake. Impacts to the boating public will not be significant and the United States Coast Guard may, at their discretion, issue a warning to mariners notifying them of the construction related activity in the vicinity of the island. Because most components will be shipped directly between the Port of Oswego and Galloo Island no impacts to local roads from the construction of the Project will occur. There will be no significant adverse impacts to emergency services because the Project will provide its own fire and emergency evacuation services on the island while local ambulance services may be required to transport injured persons on the mainland to a hospital. Additionally, there are no impacts to town services, open space or the local tax base.