

Prattsburgh Wind Farm

Case No. 21-00749

900-2.10 Exhibit 9

Cultural Resources

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EXHIBIT 9 CULTURAL RESOURCES

On behalf of the Applicant, Environmental Design and Research (EDR), completed cultural resources studies for the Facility¹ in accordance with the requirements of 19 New York City Rules and Regulations (NYCRR) 900-1.3(h)(2), 900-2.9, and 900-2.10(b). The Applicant has consulted with the New York State Historic Preservation Office (NYSHPO) to develop the scope and methodology for cultural resources studies for the Facility. The Applicant initiated consultation with the NYSHPO on February 17, 2021 (EDR, 2021a; see Table 9-1). To date, formal consultation with the NYSHPO has included initiating Facility review and consultation through the NYSHPO's Cultural Resources Information System (CRIS) website,² submission of survey methodologies, completion of cultural resources surveys, and completion of the Historic Resources and Archaeological survey technical reports. The cultural resources reports and chronology of submission/review of these reports by the NYSHPO are summarized within this exhibit.

Correspondence with the NYSHPO and Indigenous Nations regarding cultural resources studies is included in Table 9-1.

Table 9-1. Summary of Cultural Resources Correspondence

Date	Sender	Recipient(s)	Content
February 17, 2021	EDR on behalf of Prattsburgh Wind LLC	NYSHPO	Formal consultation initiated with the NYSHPO via the Cultural Resources Information System (CRIS) website (EDR, 2021a).
February 26, 2021	NYSHPO	EDR	Response to initial request for consultation and request for Phase IA archaeological survey (NYSHPO, 2021a).
February 28, 2021	EDR on behalf of Prattsburgh Wind, LLC	ORES	<i>Phase IA Archaeological Survey, Prattsburgh Wind Farm, Towns of Prattsburgh, Avoca, Cohocton, Howard, and Wheeler, Steuben County, New York</i> (EDR, 2021b).
March 2, 2021	EDR on behalf of Prattsburgh Wind, LLC	NYSHPO	<i>Phase IA Archaeological Survey, Prattsburgh Wind Farm, Towns of Prattsburgh, Avoca, Cohocton, Howard, and Wheeler, Steuben County, New York</i> (EDR, 2021b).
March 3, 2021	NYSHPO	EDR	Response to initial request for consultation and request for Phase IA historic resources survey (NYSHPO, 2021b).

¹ As defined throughout this Application, the Facility refers to all components of the proposed Project, including wind turbines, underground and overhead collection lines, access roads, temporary and permanent meteorological towers, Aircraft Detection Lighting System (ADLS) towers, laydown yards, a concrete batch plant, electric transmission line, collection substation, point of interconnection switchyard, and any other improvements subject to the Office of Renewable Energy Siting (ORES) jurisdiction.

² NYSHPO's Cultural Resources Information System is accessible at: <http://www.nysparks.com/shpo/online-tools/>.

Date	Sender	Recipient(s)	Content
March 12, 2021	NYSHPO	EDR	Concurrence with Phase IA Archaeological Survey and request for Phase IB archaeological survey (NYSHPO, 2021c).
March 19, 2021	EDR on behalf of Prattsburgh Wind, LLC	NYSHPO	<i>Phase IA Historic Resources Survey Methodology, Prattsburgh Wind Farm, Towns of Prattsburgh, Avoca, Cohocton, Howard, and Wheeler, Steuben County, New York</i> (EDR, 2021c).
March 29, 2021	NYSHPO	EDR	Concurrence with Phase IA Historic Resources Survey Methodology and request for historic resources survey (NYSHPO, 2021d).
April 26, 2021	EDR on behalf of Prattsburgh Wind, LLC	Prattsburgh Community Historical Society, Town of Prattsburgh Historian, Town and Village of Avoca Historian, Avoca Town and Village Historical Society, Town and Village of Cohocton Historian, Town of Howard Historian, Town of Wheeler Historian, Town and Village of Bath Historian, Town of Hornellsville Historian, Town of Urbana Historian, Steuben County Historian, Steuben County Historical Society, Cohocton Historical Society, Town of Pulteney Historian, Town of Fremont Historian, and Painted Hills Genealogical Society	Local stakeholder consultation initiated in order to identify potential historic resources located within the Historic Resources Study Area.
June 23, 2022	EDR on behalf of Prattsburgh Wind, LLC	Seneca Nation of Indians (SNI); Tonawanda Seneca Nation (TSN)	Project introduction letter and maps (EDR, 2022a), Phase IA Archaeological Survey (EDR, 2021b), and Phase IA Historic Resources Survey Methodology (EDR, 2021c).
September 9, 2022	EDR on behalf of Prattsburgh Wind, LLC	NYSHPO	Historic Resources Survey Report (EDR, 2022b).
September 13, 2022	EDR on behalf of Prattsburgh Wind, LLC	NYSHPO	Phase IB Archaeological Survey (EDR, 2022c)

Cultural resources studies and correspondence completed for the Facility include:

- A compilation of cultural resources correspondence (Appendix 9-A)
- A Phase IA Archaeological Survey (EDR, 2021b; Appendix 9-B)
- A Phase IA Historic Resources Survey Methodology (EDR, 2021c; Appendix 9-C)
- A Historic Resources Survey Report (EDR, 2022b; Appendix 9-D)
- A Phase IB Archaeological Survey (EDR, 2022c; Appendix 9-E)
- An Unanticipated Cultural Resource Discovery Protocol (EDR, 2022d; Appendix 9-F).

Cultural resources studies typically identify a Project Impact Area (PIA), also referred to as the Area of Potential Effect (APE),³ which defines the potential impacts and appropriate study area within which to evaluate potential impacts. For the Facility, the APE includes an APE for Direct Effects, defined as those areas where soil disturbance or direct physical impacts are proposed to occur during construction (potentially impacting below ground archaeological resources), and an APE for Visual Effects,⁴ which includes those areas where the Facility may result in visual or auditory effects on above ground historic properties and/or buildings. These potential effects, and the studies undertaken to evaluate the Facility's potential effects on cultural resources, are described in greater detail below.

(a) Archaeological Resources

In accordance with the requirements of NYCRR 900-1.3(h)(1-2), the Applicant has engaged in ongoing consultation with the NYSHPO and has completed Phase I archaeological resources studies for the Facility.

(1) Summary of Impacts and Avoidance Measures

A Phase IA Archaeological Survey was developed and submitted to the NYSHPO for review and comment. The Phase IA report defines the Facility's APE for Direct Effects relative to archaeological resources and identifies if any previously documented archaeological resources occur within the APE for Direct Effects (Appendix 9-B). To identify potential archaeological sites within the Facility Site, the Applicant completed Phase IB Archaeological Survey fieldwork in accordance with the methodology outlined in the Phase IA Archaeological Survey. The archaeological surveys were conducted by EDR and Hartgen Archaeological Associates (HAA) in a series of site visits and mobilizations between December 2020 and June 2022, concurrent with the evolving Facility design. Due to changes in the Facility layout, some areas that were submitted to Phase IB survey are no longer within the Facility Site or APE for Direct Effects. In these areas, Facility components were moved or eliminated to avoid impacts to archaeological resources, or due to other siting constraints (e.g., wetland impacts, slopes, landowner preferences, etc.). Consistent with the procedure/schedule established by the NYSHPO, a detailed Phase IB Archaeological Survey report was submitted to the NYSHPO on September 13, 2022.

³ The project impact area (PIA) as defined in 19 NYCRR § 900-1.3(h) is synonymous with the Area of Potential Effect for Direct Effects for below ground resources as described in this exhibit and all associated support studies.

⁴ The PIA as defined in 19 NYCRR § 900-2.10 is synonymous with the Area of Potential Effect for Visual Effects for above ground resources as described in this exhibit and all associated support studies.

The Phase IB archaeological survey identified a total of 51 archaeological resources. In the opinion of EDR, 36 of the archaeological resources are not eligible for inclusion in the State and National Register of Historic Places (S/NRHP) and no additional archaeological investigation is recommended. Fifteen archaeological resources are considered unevaluated for inclusion in the S/NRHP. Ten of these sites appear to retain the integrity necessary to potentially yield important information about local and regional history. EDR recommends avoidance of these resources, or Phase II investigations if avoidance is not possible. Five of these sites remain unevaluated as they were identified outside (or mostly outside) the area where Phase IB survey was ultimately conducted and only preliminarily investigated. Since these sites are outside the APE, no avoidance is necessary and no further investigations are recommended.

In an effort to avoid impacts to archaeological resources, the Applicant has moved, modified, or eliminated several Facility components. As such, only one archaeological resource recommended by EDR for avoidance remains within the proposed APE for Direct Effects for an overhead collection line. No grading will occur within approximately 74 feet of the site, overhead collection line pole structures will not be installed within 50 feet of the site, tree clearing within (or within 50 feet of) the site will occur by hand and not involve stump removal (i.e., trees will be cut at ground level), and installation of a temporary road, which will occur approximately 16 feet from the site, will only involve the temporary addition of fill (i.e., no grading). Furthermore, the APE for Direct Effects, and a 50-foot buffer around the site will be covered in timber matting to prevent disturbance to the ground surface during installation of the overhead collection line. With the implementation of these preventative measures, no impacts to any potentially significant archaeological resources are anticipated as a result of Facility construction. No further archaeological investigations are recommended for the Facility.

The mapped locations of all potentially significant (i.e., unevaluated for the S/NRHP) or archaeological sites within approximately 100 feet of proposed Facility-related impacts will be identified as "Environmentally Sensitive Areas" or similar on Facility construction maps and marked in the field by construction fencing with signs that restrict access. The Applicant will continue to consult with the NYSHPO to ensure that recommended avoidance measures meet the expectations of the NYSHPO.

In the event that unanticipated archaeological resources are encountered during construction, the Facility's Unanticipated Cultural Resources Discovery Protocol (EDR, 2022d; Appendix 9-F) will include provisions to stop all work in the vicinity of the archaeological finds until those resources can be evaluated and documented by an archaeologist. With the adoption of these measures, additional avoidance measures currently being assessed, and continued consultation with the NYSHPO, the proposed Prattsburgh Wind Farm is not anticipated to affect any significant archaeological resources.

(2) Phase IA Cultural Resources Study

In compliance with the requirements of 19 NYCRR 900-1.3(h)(1), the Applicant initiated consultation regarding the Facility with the NYSHPO (for the summary of correspondence, see Table 9-1; Appendix 9-A) that included a description of the proposed Facility, a map of the Facility Site, and a proposed methodology. The NYSHPO replied with a recommendation for a Phase IA Archaeological Survey. The

Phase IA Archaeological Survey (EDR, 2021b; Appendix 9-B) was submitted through the CRIS website, approved by the NYSHPO, and is summarized below. The purpose of the Phase IA archaeological resources survey is to: 1) define the Facility's APE relative to archaeological resources based on the anticipated area of disturbance for Facility components; 2) determine whether previously identified archaeological resources are located within the APE for Direct Effects; and 3) propose a methodology to identify additional archaeological resources within the APE for Direct Effects, evaluate their eligibility for inclusion in the S/NRHP, and assess the potential effect of the Facility on those resources. The Phase IA report was prepared by professionals who satisfy the qualification criteria per the Secretary of the Interior's Standards for archaeology (36 CFR 61) and in accordance with applicable portions of the NYSHPO's *Phase I Archaeological Report Format Requirements* (NYSHPO, 2005).

Relative to the potential for archaeological sites to be located within the Facility Site, the results of the Phase IA archaeological resources survey for the proposed Facility can be summarized as follows:

- According to the CRIS database, no previously recorded archaeological resources are located within the APE for Direct Effects. Three previously recorded archaeological sites are within the Facility Site. These are the Area #9 Precontact Site (USN 10102.000032); the map-documented structures (MDS) 27 Barn Foundation Site (USN 10118.000029); and the Schoolhouse 1 Site (USN 10131.000006).
- Sixteen previously recorded archaeological sites are located within 1 mile (1.6-kilometer) of the Facility Site, which include three lithic scatters, two nineteenth to twentieth-century residential sites, one nineteenth-century barn site, one nineteenth-century outbuilding site, one possible burial site, and eight sites with no information.
- A historical map review indicates that 24 MDSs are located adjacent to, and/or within, the Facility Site. Areas located in the immediate vicinity—within approximately 200 feet (61 meters)—of MDS locations are considered to have elevated sensitivity for the presence of archaeological resources. The remaining (non-MDS) portions of the Facility Site exhibit minimal likelihood for historically documented structures or associated artifact scatters to be present.
- Based on EDR's archaeological sensitivity model, approximately 24.2 acres (6.4 percent) of the 377.7-acre APE for Direct Effects is considered sensitive for archaeological resources.

In addition, the Phase IA Archaeological Survey proposed a methodology to conduct a Phase IB archaeological survey for the Facility, which was reviewed and approved by the NYSHPO. The preliminary results of the Phase IB archaeological survey are described below.

(3) Phase IB Cultural Resources Study

The Applicant conducted Phase IB archaeological surveys over multiple mobilizations between December 2020 and June 2022 to identify archaeological sites within the Facility Site. The Phase IB surveys for the Facility were conducted by EDR and HAA under the supervision of Registered Professional Archaeologists (RPAs) in a manner consistent with the New York Archaeological Council

(NYAC) *Standards for Cultural Resource Investigations and Curation of Archaeological Collections in New York State* (the NYAC Standards; NYAC, 1994). A comprehensive Phase IB Archaeological Survey report was prepared in accordance with the NYSHPO's *Phase I Archeological Report Format Requirements* (NYSHPO, 2005).

The NYSHPO recommended Phase IB archaeological testing for areas in the APE that have elevated sensitivity archaeological resources. The ground disturbance typically includes wind turbine sites, operations and maintenance facilities, laydown yards, new access roads, buried collection lines, met towers, and areas of tree removal, grubbing, and grading. The NYSHPO concurred with the Phase IB survey research design presented in the Phase IA Archaeological Survey report to conduct Phase IB survey in areas of elevated archaeological sensitivity that overlapped with the Facility's APE for Direct Effects, which at the time included 24.2 acres of the 377.7-acre APE for Direct Effects (NYSHPO, 2021c; Appendix 9-A). The GIS-based model has been updated concurrently with Facility revisions throughout the course of the December 2020 to June 2022 Phase IB survey mobilizations. The Facility was first surveyed by HAA in December 2020 and again from April to May 2021, at which time the APE for Direct Effects measured approximately 602.6 acres. Additional Phase IB survey was conducted by EDR from September 2021 to June 2022, following revisions to the Facility layout and an increase in the APE for Direct Effects to approximately 793 acres. Approximately 72 acres (9.2 percent) of the 793-acre APE for Direct Effects is categorized as having elevated archaeological sensitivity. Due to layout changes, however, many areas that were tested as part of the Phase IB survey are no longer part of the APE for Direct Effects.

Between December 2020 and June 2022, a total of 6,089 shovel test pits were excavated and approximately 45 acres of pedestrian surface survey was conducted (all by EDR) during the combined Phase IB archaeological survey efforts completed for the Facility. As summarized in Table 9-2 and further described in the Phase IB Archaeological Survey report, the archaeological survey resulted in the identification of 51 archaeological resources, consisting of 42 sites and nine isolates. These include nine isolated Indigenous lithic debitage or tools, four Indigenous lithic scatter sites, two multicomponent sites (Indigenous lithic scatters and nineteenth to twentieth-century residential foundation and/or artifact scatters), five nineteenth-century residential artifact scatter sites, 29 nineteenth to twentieth-century sites with various residential and agricultural foundations, artifact scatters, and extant buildings, one twentieth-century well site, and one twentieth-century residential artifact scatter site. A total of 2,832 artifacts were collected during all Phase IB archaeological survey efforts completed for the Facility. See Table 9-2 below for a descriptive summary of each identified archaeological resource, as well as potential Facility impacts, avoidance measures, and S/NRHP recommendations.

Table 9-2. Summary of Archaeological Resources Identified During the Phase IB Survey

Site/Isolate	Description	Appendix / Sheet	Potential Impact	Avoidance Measure / Recommendation
19011-001	Mid- to late nineteenth century architectural and domestic artifact scatter with disarticulated architectural debris	Appendix C: Sheet 24; Appendix D: Sheet 1	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-002 (Hartgen: J. Franklin Homestead)	Mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter with structural remnants	Appendix C: Sheet 13; Appendix D: Sheet 2	None – Outside of APE, but potential impacts to 50-foot buffer	None, preventative measures described above – Unevaluated for inclusion in the S/NRHP
19011-003	Late nineteenth to early twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 30; Appendix D: Sheet 3	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-004 (Hartgen: Mrs. D. Dillenback Farmstead Site)	Mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter with structural remnants and displaced architectural remains	Appendix C: Sheet 55; Appendix D: Sheet 4	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-005	Mid-nineteenth century domestic and architectural artifact scatter	Appendix C: Sheet 43; Appendix D: Sheet 5	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-006	Mid-nineteenth to early twentieth century domestic and architectural artifact scatter with disarticulated architectural debris	Appendix C: Sheet 81; Appendix D: Sheet 6	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-007	Mid- to late nineteenth century domestic and architectural artifact scatter	Appendix C: Sheet 62; Appendix D: Sheet 7	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-008	Early twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 51; Appendix D: Sheet 8	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria

Site/Isolate	Description	Appendix / Sheet	Potential Impact	Avoidance Measure / Recommendation
19011-009	Mid-nineteenth to early twentieth century domestic and architectural artifact scatter with structural remnants and disarticulated architectural debris	Appendix C: Sheet 15; Appendix D: Sheet 9	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-010	Mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 90; Appendix D: Sheet 10	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria
19011-011	Native American lithic scatter of unknown age with potential subsurface feature	Appendix C: Sheet 48; Appendix D: Sheet 11	None – Outside of APE, but potential impacts to 50-foot buffer	None, per preventative measures described above – Unevaluated for inclusion in the S/NRHP
19011-012 (Hartgen: Tenmile Creek Precontact Site-Locus 2)	Native American lithic scatter of unknown age	Appendix C: Sheets 69; Appendix D: Sheet 12	None – Outside of APE	None (already avoided)
19011-013 (Hartgen Tenmile Creek Precontact Site-Locus 1)	Native American lithic scatter of unknown age	Appendix C: Sheet 69; Appendix D: Sheet 13	None (avoidance planned) – Within the APE	None, per preventative measures described above – Unevaluated for inclusion in the S/NRHP
19011-014 (Hartgen: J. Covell Homestead Site)	Combination Native American and Euro-American site consisting of a lithic scatter of unknown age and a mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter with structural remnants	Appendix C: Sheet 48; Appendix D: Sheet 14	None – Outside of APE, but potential impacts to 50-foot buffer	None, per preventative measures described above – Unevaluated for inclusion in the S/NRHP
19011-015	Mid-nineteenth to mid-twentieth century domestic artifact scatter	Appendix C: Sheet 104; Appendix D: Sheet 15	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria
19011-016	Early nineteenth to early twentieth century domestic and agricultural artifact scatter	Appendix C: Sheet 67; Appendix D: Sheet 16	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-017 (Hartgen: A. Olmsted Homestead Site)	Mid-nineteenth to early twentieth century domestic and architectural artifact scatter with potential filled-in house cellar	Appendix C: Sheet 83; Appendix D: Sheet 17	None – Outside of APE	None (already avoided) – Unevaluated for inclusion in the S/NRHP

Site/Isolate	Description	Appendix / Sheet	Potential Impact	Avoidance Measure / Recommendation
19011-020	Mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 94; Appendix D: Sheet 20	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria
19011-022	Single nineteenth-century artifact associated with a mid-nineteenth to early twenty-first century farmstead with extant and non-extant structural elements	Appendix C: Sheets 111-113; Appendix D: Sheet 22	None – Outside of APE, but potential impacts to 50-foot buffer	None (already avoided) – Unevaluated for inclusion in the S/NRHP
19011-023	Mid-nineteenth to early twentieth century domestic and architectural artifact scatter with structural remnants and disarticulated architectural debris	Appendix C: Sheet 37; Appendix D: Sheet 23	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-024	Late nineteenth to mid-twentieth century architectural, domestic, and agricultural artifact scatter with disarticulated architectural debris	Appendix C: Sheet 97; Appendix D: Sheet 24	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria
19011-025	Mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter with structural remnants and disarticulated architectural debris	Appendix C: Sheet 93; Appendix D: Sheet 25	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria
19011-026	Early to mid-nineteenth century domestic and architectural artifact scatter	Appendix C: Sheet 78; Appendix D: Sheet 26	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-027	Late nineteenth to mid-twentieth century domestic and architectural artifact scatter with extant barn, structural remnants, and disarticulated architectural debris	Appendix C: Sheet 110; Appendix D: Sheet 27	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria

Site/Isolate	Description	Appendix / Sheet	Potential Impact	Avoidance Measure / Recommendation
19011-028	Early to late nineteenth century domestic and architectural artifact scatter	Appendix C: Sheet 5; Appendix D: Sheet 28	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-029	Late nineteenth to late twentieth century architectural, domestic, and agricultural artifact scatter	Appendix C: Sheet 53; Appendix D: Sheet 29	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-030	Late nineteenth to early twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 67; Appendix D: Sheet 30	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria
19011-031	Mid-nineteenth to late twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 65; Appendix D: Sheet 31	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria
19011-032	Mid-nineteenth to early twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 84; Appendix D: Sheet 32	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria
19011-033	Early nineteenth to mid-twentieth century domestic and architectural artifact scatter with structural remnants and disarticulated architectural debris	Appendix C: Sheet 83; Appendix D: Sheet 33	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-034	Mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 103; Appendix D: Sheet 34	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-035	Mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 106; Appendix D: Sheet 35	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-036	Mid-nineteenth to early twentieth century domestic and architectural artifact scatter with structural remnants and disarticulated architectural debris	Appendix C: Sheets 116-117; Appendix D: Sheet 36	Impacted – Within the APE	None – Does not meet S/NRHP eligibility criteria

Site/Isolate	Description	Appendix / Sheet	Potential Impact	Avoidance Measure / Recommendation
19011-037	Early nineteenth to mid-twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 27; Appendix D: Sheet 37	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-038	Late nineteenth to early twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 88; Appendix D: Sheet 38	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
19011-040	Combination Native American and Euro-American site consisting of a potential Middle to Late Archaic lithic scatter and a mid-nineteenth to mid-twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 97; Appendix D: Sheet 40	None – Outside of APE	None (already avoided) – Unevaluated for inclusion in the S/NRHP
19011-041	Native American lithic scatter of unknown age	Appendix C: Sheet 48; Appendix D: Sheet 41	None – Outside of APE	None (already avoided) – Unevaluated for inclusion in the S/NRHP
19011-042	Late nineteenth to late twentieth century domestic and architectural artifact scatter	Appendix C: Sheet 100; Appendix D: Sheet 42	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria
C. Fox Homestead Site (Hartgen)	Nineteenth to twentieth century house foundation, outbuilding foundation, and water well	Appendix B: (Section: 5.2.4.2; Map 2-18); Appendix C: Sheet 74; Appendix D: Sheet 47	None – Outside of APE	None (already avoided) – Unevaluated for inclusion in the S/NRHP as site was only preliminarily investigated
D. L. Robords Homestead Site (Hartgen)	Late nineteenth to twentieth century domestic and architectural artifact scatter with structural remnants	Appendix B (Section 5.2.4.6; Map 2-31); Appendix C: Sheet 35; Appendix D: Sheet 48	None – Outside of APE	None (already avoided) – Unevaluated for inclusion in the S/NRHP
J. Nipher Homestead Site (Hartgen)	Late nineteenth to twentieth century domestic and architectural artifact scatter with structural remnants	Appendix B (Section 5.2.4.5; Map 2-30); Appendix C: Sheet 34; Appendix D: Sheet 49	None – Outside of APE	None (already avoided) – Unevaluated for inclusion in the S/NRHP

Site/Isolate	Description	Appendix / Sheet	Potential Impact	Avoidance Measure / Recommendation
Saxton Road Historic Site (Hartgen)	Twentieth-century stone-lined water well	Appendix B (Section 5.2.4.7; Map 2-40); Appendix C: Sheet 24; Appendix D: Sheet 50	None – Outside of APE	None – Does not meet S/NRHP eligibility criteria

(4) Phase II Study

Phase II studies are implemented to obtain more detailed information about an archaeological site, and to evaluate its eligibility for listing in the S/NRHP. As previously stated, the Applicant is implementing Facility design measures to avoid impacts to the locations of archaeological sites unevaluated for inclusion in the S/NRHP. Phase II investigations are only warranted in the event that these unevaluated resources cannot be avoided by Facility impacts. The final Facility design will avoid all archaeological resources.

(5) Unanticipated Cultural Resources Discovery Protocol

An Unanticipated Cultural Resources Discovery Protocol is included as Appendix 9-F of this Application. The protocol identifies the actions to be taken in the unexpected event that resources of cultural, historical, or archaeological importance are encountered during Facility construction. Included is a provision for work stoppage upon the discovery of possible archaeological or human remains. Evaluation of such discoveries, if warranted, will be conducted by a Registered Professional Archaeologist, qualified according to the NYAC *Standards* (NYAC, 1994).

(b) Historic Resources

In accordance with the requirements of NYCRR 900-2.10(b), EDR has engaged in ongoing consultation with the NYSHPO and has completed historic resources studies for the Facility on behalf of the Applicant. As required per NYCRR 900-2.10(b), the historic resources studies conducted for the Facility are included as Appendices 9-C and 9-D.

As part of the Visual Impact Assessment (VIA) prepared for the Facility (see Exhibit 8), the Applicant conducted a systematic program of public outreach to assist in the identification of visually sensitive resources. Copies of the correspondence sent by the Applicant as part of this process, as well as responses received from stakeholders, are included in the VIA. In order to identify potentially visually sensitive historic resources, the Applicant conducted outreach to the following town and village historians and historical societies (summarized in the Historic Resources Survey Report [Appendix 9-D]):

- Lenora Applebee, Town of Prattsburgh Historian and Prattsburgh Community Historical Society Director

- Judith Wightman, Town and Village of Avoca Historian
- Peter Gledhill, Town and Village of Avoca Historian
- Geraldine Deussenberg, Town and Village of Cohocton Historian
- Marsha Patrick, Town of Howard Historian
- Emma Partridge, Town of Wheeler Historian
- Eleanor Silliman, Town and Village of Bath Historian
- Terry Bretherton, Town of Urbana Historian
- Emily Simms, Steuben County Historian
- Kirk House, Cohocton Historical Society Director
- Avoca Town and Village Historical Society
- Town of Hornellsville Historian
- Town of Pulteney Historian
- Town of Fremont Historian
- Painted Hills Genealogical Society
- Steuben County Historical Society.

On behalf of the Applicant, EDR initiated correspondence with Native American nations with a Project Introduction Letter dated June 23, 2022 (EDR, 2022a; Appendix 9-A) in order to identify potentially visually sensitive historic resources as required by NYCRR 900-2.10(b). The Applicant initiated outreach with the following nations via correspondence on June 23, 2022:

- Seneca Nation of Indians
- Tonawanda Seneca Nation.

As part of this outreach, the Applicant provided copies of cultural resources survey reports completed to date to the above-mentioned Native American nations. At the time of this filing, the Applicant has not received any response from the Seneca Nation of Indians or the Tonawanda Seneca Nation.

(1) Historic Resources Surveys

Historically significant resources are defined herein to include buildings, districts, objects, structures, and/or sites that have been listed in the S/NRHP, as well as those properties that the NYSHPO has formally determined are eligible for listing in the S/NRHP. The Applicant has engaged in ongoing consultation with the NYSHPO in order to evaluate the Facility's potential effect on historic resources listed or eligible for listing in the S/NRHP.

Area of Potential Effect Relative to Aboveground Historic Resources

Per the requirements set forth in 19 NYCRR § 900(bx), the study area to be used for analysis of major electric generating facilities is defined as:

(bx) Study area means the area generally related to the nature of the technology and the setting of the proposed site. Unless otherwise provided in this Part, in highly urbanized areas, the study area is a minimum on (1)-mile radius from the property boundaries of the facility site, interconnections and related facilities, and for facilities with components spread across a rural landscape, the study area shall at a minimum include the area within a radius of at least five (5) miles from all generating facility components, interconnections and related facilities.

To ensure that potential visual effects on regional visually sensitive historic resources are adequately considered under Section 94-c, and in accordance with the *New York State Historic Preservation Office Guidelines for Wind Farm Development Cultural Resources Survey Work* (NYSHPO, 2006), the historic resources survey addresses a 5-mile Historic Resources Study Area. The 5-Mile Historic Resources Study Area includes portions of the Towns of Prattsburgh, Avoca, Cohocton, Howard, Wheeler, Pulteney, Wayland, Dansville, Fremont, Hornellsville, Urbana, and Bath, including the Villages of Avoca and Cohocton, in Steuben County; a portion of the Town of Naples in Ontario County; and portions of the Towns of Italy and Jerusalem in Yates County, New York.

The Facility will have no direct physical impacts to aboveground historic resources (i.e., no historic structures will be damaged or removed). The Facility's potential effect on a given historic property would be a change in the property's visual setting (resulting from the introduction of wind turbines or other Facility components). Therefore, the APE for Visual Effects on historic resources includes those areas where Facility components (including wind turbines) will be visible and where there is a potential for a significant visual effect. The APE for Indirect Effects was developed based on a viewshed analysis utilizing a digital elevation model of the Historic Resources Study Area.

Indirect effects to historic properties could theoretically consist of auditory and/or visual effects. A discussion of potential noise impacts of the Facility is provided in Exhibit 7 and Appendix 7-A (Pre-Construction Sound Level Impact Assessment) of this Application.

The proposed wind turbines could be a significant new feature in the visual landscape. The preparation of a GIS-based viewshed analysis is discussed in the Phase IA Historic Resources Survey (Appendix 9-C), Historic Resources Survey (Appendix 9-D), and in Exhibit 8 (Visual Impacts) of this Application.

Phase IA Historic Resources Survey Methodology

A formal consultation request was made to the NYSHPO via the CRIS website on February 17, 2021, that included a description of the proposed Facility as well as a map of the Facility Area (Appendix 9-A). On March 3, 2021, the NYSHPO provided a response via CRIS concurring with EDR's general approach to the historic resources survey and requesting a methodology and scope of work for historic resources surveys for the Facility (NYSHPO, 2021b; Appendix 9-A).

The Applicant prepared a Phase IA Historic Resources Survey Methodology (Appendix 9-C), which was submitted through the CRIS website on March 19, 2021. The purpose of the Phase IA Historic Resources Survey Methodology was to identify and document those resources within the Facility's APE that appear to satisfy S/NRHP criteria and to provide a scope of work for additional survey of the Historic Resources Study Area and APE for Visual Effects for the Facility. All work as part of the Phase IA Historic Resources Survey was conducted by qualified architectural historians who meet the Secretary of Interior's Standards for Historic Preservation Projects as defined in 36 CFR Part 61 (CFR, 2020).

On March 29, 2021, the NYSHPO provided a response via the CRIS website to the Phase IA Historic Resources Survey Methodology, which concurred with the methodology and APE proposed by EDR (NYSHPO, 2021d; Appendix 9-A).

Historic Resources Survey

The Applicant conducted a Historic Resources Survey for the Facility (Appendix 9-D) in accordance with the methodology outlined in the Phase IA Historic Resources Survey Methodology (Appendix 9-C) in spring 2021 and summer 2022. The historic resources survey included review of previous similar studies within the Historic Resources Study Area, site visits to identify and evaluate potential historic resources within the study area, and supplemental research on specific historic properties (as necessary). As a part of the historic resources survey, EDR also contacted local historians and historical societies seeking input regarding the identification of historic resources with historic or architectural significance located within the APE for Visual Effects and Historic Resources Study Area. Outreach included phone and email conversations, the outcomes of which are summarized in the Historic Resources Survey Report (Appendix 9-D).

All historic resources survey fieldwork was conducted by qualified architectural historians who meet the Secretary of Interior's Standards for Historic Preservation Projects as defined in 36 CFR Part 61 (CFR, 2020). Prior to conducting the historic resources survey fieldwork, EDR reviewed the CRIS website maintained by the NYSHPO to identify previously completed historic resources studies, previously identified significant historic buildings and/or districts (i.e., properties listed in or determined eligible for listing in the S/NRHP), as well as other previously identified historic resources (i.e., cemeteries, bridges, monuments) located within the APE for Indirect Effects. As described in the Phase IA Historic Resources Survey Methodology (Appendix 9-C) and Historic Resources Survey Report (Appendix 9-D), areas that were surveyed in 2017 as part of the Baron Winds Historic Resources Survey were not surveyed for the Facility. EDR analyzed the APE for Visual Effects for both projects and identified limited

areas within the APE for Visual Effects for the Prattsburgh Wind Farm and within the Historic Resources Study Area for Baron Winds but outside the APE for Visual Effects for Baron Winds. These areas were surveyed by EDR to ensure that all historic resources within the Facility's APE for Visual Effects have been identified.

Historic resources survey fieldwork included systematically walking and/or driving all public roads within the Historic Resources Study Area to evaluate the S/NRHP eligibility of structures and properties within the APE. Site visits were conducted on April 28-30, 2021, August 20, 2021, and June 27, 2022. When historic properties were identified that were not previously surveyed but appeared to satisfy S/NRHP eligibility criteria, EDR's architectural historians documented the existing conditions of the property, using the ArcGIS Online application software to collect geospatial location data. Photographs of the building(s) (and associated property when necessary) and field notes describing the style, physical characteristics and materials (e.g., number of stories, plan, external siding, roof, foundation, and sash), condition, physical integrity, and other noteworthy characteristics were recorded for each resource. EDR's evaluation of historic resources within the study area focused on the physical condition and integrity (with respect to design, materials, feeling, and association) to assess the potential architectural significance of each resource.

All properties evaluated in the historic resources survey were photographed and assessed from public rights-of-way. The condition and integrity of all resources were evaluated based solely on the visible exterior of the structures. No inspections or evaluations requiring access to the interior of buildings, or any portion of private property, were conducted as part of this assessment. Based on consultation with the NYSHPO and as described in the Phase IA Historic Resources Survey Methodology, buildings that were not sufficiently old (i.e., less than 50 years in age), that lacked architectural integrity, or have been evaluated by EDR's architectural historians as lacking historical or architectural significance were *not* included in or documented during the survey.

Properties inventoried and evaluated as part of the historic resources survey included both previously and newly identified resources. A total of 177 resources are located within the Historic Resources Study Area and APE for Visual Effects for the Facility. The results of the survey are summarized as follows:

- A total of 48 resources surveyed in 2017 for the Baron Winds Project were not evaluated by EDR as part of the historic resources survey; they include:
 - Three resources listed in the S/NRHP;
 - A total of 44 resources determined by the NYSHPO to be eligible for listing in the S/NRHP; and
 - One resource, a cemetery which is not visible from the public right-of-way, with undetermined S/NRHP eligibility.
- No change in status was recommended by EDR for the S/NRHP-listed Smith McCloud House (94NR00648).

- Of the 24 resources previously determined by the NYSHPO to be S/NRHP-eligible (excluding those surveyed for the Baron Winds project), EDR recommended no change in status for 22 resources and recommended that the remaining two resources no longer meet S/NRHP eligibility criteria.
- Of the 58 resources which had not been formally evaluated in terms of their S/NRHP eligibility (excluding those surveyed for the Baron Winds project), EDR recommended that 25 are S/NRHP-eligible, 31 are not S/NRHP-eligible, and one (a cemetery) is not visible from the public right-of-way.
- A total of two resources were identified through consultation with local stakeholders; one was recommended by EDR to be S/NRHP-eligible and the other was recommended by EDR to not be S/NRHP-eligible.
- An additional 45 resources not previously documented in CRIS were identified by EDR and were recommended to meet S/NRHP eligibility criteria.
- No new potentially S/NRHP-eligible historic districts were identified.

No resources recommended or previously determined to be eligible for listing in the S/NRHP are located within the Facility Site. No further historic resource surveys were recommended for the Facility. A Historic Resources Survey report (Appendix 9-D) summarizing the findings of this survey was submitted to the NYSHPO via the CRIS website on September 9, 2022.

(2) Analysis of Potential Impacts to Historic Resources

The Historic Resources Survey report (Appendix 9-D) describes the potential impacts on historic resources located within the APE for Visual Effects, including potential visual impacts of the Facility.

Potential Direct Effects

Construction of the Facility will not require the demolition or physical alteration of any historic resources. No direct physical impacts to historic resources listed in or determined eligible for the S/NRHP will occur as a result of Facility construction. Therefore, the Facility is not anticipated to have any direct impacts to historic properties.

Potential Indirect Effects (Visual)

The Facility's potential effect on a given historic resource would be a change (resulting from the introduction of wind turbines) in the resource's setting. As it pertains to historic resources, *setting* is defined as "the physical environment of a historic property" and is one of seven aspects of a resource's *integrity*, which refers to the "ability of a property to convey its significance" (NPS, 1990). The other aspects of integrity include location, design, materials, workmanship, feeling, and association (NPS, 1990). The potential effect resulting from the introduction of wind turbines into the visual setting for

any historic or architecturally significant resource is dependent on several factors including distance, visual dominance, orientation of views, viewer context and activity, and the types and density of modern features in the existing view (such as buildings/residences, overhead electrical transmission lines, cellular towers, billboards, highways, and silos).

The Federal Regulations entitled "Protection of Historic Resources" (36 CFR 800) include in Section 800.5(2) a discussion of potential adverse effects on historic resources. The following types of effects apply to the Facility:

Adverse effects on historic properties include but are not limited to: [items i-iii do not apply]; (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance; (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features; [items vi-vii do not apply] (CFR, 2020).

The implementing regulations for New York State Parks, Recreation and Historic Preservation Law, Section 14.09 (9NYCRR §428.7) state:

- a. *In determining whether an undertaking will have an adverse impact on eligible or register property, the commissioner shall consider whether the undertaking is likely to cause:*
1. *destruction or alteration of all or part of the property;*
 2. *isolation or alteration of the property's environment;*
 3. *introduction of visual, audible or atmospheric elements which are out of character with the property or alter its setting;*
 4. *neglect of the property resulting in its deterioration or destruction.*

In defining aesthetic impacts to visually sensitive resources (such as historic buildings or other properties), the New York State Department of Environmental Conservation's (NYSDEC) Visual Policy states:

Aesthetic impact occurs when there is a detrimental effect on the perceived beauty of a place or structure. Significant aesthetic effects are those that may cause a diminishment of the public enjoyment and appreciation of an inventoried resource, or one that impairs the character or quality of such a place...In this regard, staff must consider 'magnitude' and 'importance' in determining the significance of a visual impact under SEQR. Magnitude assesses factors such as severity, size or extent of an action. Importance relates to how many people are going to be impacted or affected by the project; the geographic scope of the project; and any additional social or environmental consequences if the project proceeds (or doesn't proceed). Each impact of an action must be judged by these two characteristics. (NYSDEC, 2019)

Under this approach, the mere fact that the Facility may be visible from a particular historic resource does not constitute a significant impact to that resource. Instead, the significance and magnitude of the impact as defined in the NYSDEC Visual Policy must be considered.

Much of the Facility's APE for Visual Effects is located in areas consisting of farmsteads and agricultural landscapes with a traditional rural character. These landscape elements include open fields, pastures, hedgerows, forest stands, and other rural landscape features. Many of these open areas extend beyond the APE for Visual Effects and the Historic Resources Study Area, cross municipal and parcel boundaries, are inaccessible to the public, and are not associated with any specific historic resources previously identified by the NYSHPO. Consequently, the various rural landscapes and open agricultural areas located within the APE were not evaluated as specific historic resources in conducting the Historic Resources Survey (Appendix (9-D)). However, the potential effects of the Facility on these rural landscapes will be evaluated as part of the VIA to be included as part of the Section 94-c Application for the Facility, as well as Exhibit 8 (Visual Impacts) of the Application.

Relative to historic properties, the potential visual effect of the Facility is therefore limited to the overall effect on the traditional agricultural landscape that serves as the setting for historic properties in the region. The introduction of modern interventions such as wind turbines and associated infrastructure will alter the historic character of the visual setting.

The Applicant will continue consultation with the NYSHPO to assist in the NYSHPO's assessment of potential Facility impacts to aboveground historic properties. Additional information regarding the projects potential visual effects is included in Exhibit 8 of this application.

(c) Avoidance, Minimization and Mitigation

The Applicant anticipates that the cultural resources surveys summarized above, as well as relevant additional information included in the Section 94-c Application will provide the basis for ongoing consultation with the NYSHPO (and other applicable consulting parties) regarding avoidance, minimization, and/or potential mitigation for visual and auditory impacts of the Facility on cultural resources. In accordance with section 900-10.2(g) of the 94-c regulations, the Applicant will complete a Cultural Resources Avoidance Minimization and Mitigation Plan (CRAMMP) as part of the Pre-Construction Compliance Filings, consisting of the following:

(g) A copy of a Cultural Resources Avoidance, Minimization and Mitigation Plan, providing:

(1) A demonstration that impacts of construction and operation of the facilities on cultural resources (including archeological sites and any stone landscape features, and historic resources) will be avoided or minimized to the extent practicable by selection the proposed facility's location, design and/or implementation of identified mitigation measures.

(2) A Cultural Resources Mitigation and Offset Plan, either as adopted by federal permitting agency in subsequent National Historic Preservation Act (NHPA) Section 106 review, or as required by the Office, in consultation with New York State Historic Preservation Office (SHPO) in the event that the NHPA Section 106 review does not require that the mitigation plan be implemented. Proof of mitigation funding awards for offset facility implementation to be provided within two (2) years of the start of construction of the facility shall be included.

The CRAMMP is anticipated to be developed in consultation with the NYSHPO review of the Phase IB Archaeological Survey report as well as the Historic Resources Survey Report. As described above, an Unanticipated Cultural Resources Discovery Plan will be prepared as part of the CRAMMP to satisfy section 900-10.2(g)(1). In addition, it is anticipated that the NYSHPO will request the preparation of Cultural Resources Mitigation and Offset Plan to address adverse impacts on historic resources within the Facility's Area of Potential Effect for Visual Effects. The Cultural Resources Mitigation and Offset Plan will summarize any outreach efforts to stakeholders as well as efforts to identify appropriate mitigation projects and offset funding amounts for those projects. Based on recent consultation with the NYSHPO regarding wind projects, it is anticipated that offset funding will total approximately \$100,000, based on the number and type of projects identified as part of outreach and discussions with stakeholders. Typical mitigation projects include funding for municipalities, local historical societies, and similar groups to support the preservation, rehabilitation, and/or interpretation of historic properties.

The Applicant anticipates that the NYSHPO's evaluation regarding potential impacts to cultural resources and/or identification of any required mitigation will be finalized as part of the U.S. Army Corps of Engineer's review of the Project under Section 106 of the National Historic Preservation Act, if necessary. Section 106 review would be triggered by submission of a wetland permit application, which is anticipated to occur following the submission of the Section 94-c Application.

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