Agricola Wind Project Project Name:

EDR Project No: 21029

Kristen Olson; Matthew Weiss Prepared By:

October 8, 2024 Date:

## Summary of Cultural Resources-Related Correspondence

Approval of the Revised Phase IA Archaeological Survey (NYSHPO, 2023).	EDR, Liberty Renewables	ОЧНЗУИ	May 30, 2023
Submission of Revised Phase IA Archaeological Survey (EDR, 2023).	OdHSAN	EDR on behalf of Liberty Renewables	8202, 22 yeM
Request for revisions to the Phase IA Archaeological Survey (NYSHPO, 2021c).	EDR, Liberty Renewables, ORES	OGHSYN	September 9, 2021
Phase IA Archaeological Survey, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York (EDR, 2021c).	OdHSAN	EDR on behalf of Liberty Renewables	,08 tsuguA 1202
Response to initial request for consultation and request for a historic resources survey work plan (NYSHPO, 2021b).	EDR, Liberty Renewables	Odhsyn	1202 ,2 ylut
Response to initial request for consultation and request for a Phase IA Archaeological Survey (NYSHPO, 2021a).	EDR, Liberty Renewables	OdHSVN	1202 ,12 enut
Formal consultation initiated with MYSHPO via the Cultural Resources Information System (CRIS) website (EDR, 2021b).	OdHSAN	EDR on behalf of Liberty Renewables	1202 ,21 9nul
Project introduction letter and maps (EDR, 2021a).	Cayuga Nation (CN), (NO) noitsN agebnonO	EDR on behalf of Liberty Renewables	1502 ,21 9nul
Content	Recipient(s)	Sender	Date

Content	(s)tnəiqiɔəЯ	Sender	Date
Phase IA Historic Resources Survey Methodology (EDR, 2024a).	OdHSVN	EDR on behalf of Liberty Renewables	4202, 2024
Approval of the Phase IA Historic Resources Survey Methodology and request for a historic resources survey report (NYSHPO, 2024a).	EDR, Liberty Renewables	Odhsyn	₽20S, 2024
Phase IA Report Consultation Letter to Nations (EDR, 2024c).	Cayuga Mation (CM), (MO) noiteM egebnonO	EDR on behalf of Liberty Renewables	13, 2024
Phase IB Αrchaeological Survey (EDR, 2024d).	OdHSAN	EDR on behalf of Liberty Renewables	102 ,85 ≙nuՆ
Phase IB Report Consultation Letter to Nations (EDR, 2024e and EDR, 2024f).	(NO) noiteN eguyeO (NO) noiteN egebnonO	EDR on behalf of Liberty Renewables	J202 ,9 √luľ
Concurrence with Phase IB Archaeological Survey (NYSPHO, 2024b).	EDR, Liberty Renewables	ОЧКУИ	101, 2024
Historic Resources Survey Report (EDR, 2024g).	Odhsyn	EDR on behalf of Liberty Renewables	,8 1suguA A202
Determination of Adverse Impact to aboveground historic resources and request for a historic preservation mitigation plan (NYSHPO, 2024c).	EDR, Liberty Renewables	Odhsyn	September 10,
Phase IB Archaeological Survey Addendum Memo, Agricola Wind Project, Towns of Venice and Scipio, Cayuga County, New York (EDR,	Odhsyn	EDR on behalf of Liberty Renewables	September 19,
Archaeological Site Avoidance Plan (EDR, )	Odhsyn	EDR on behalf of Liberty Renewables	September 19,

Content  Phase IB Archaeological Survey Addendum	Recipient(s)	Sender Sender	Date
Memo, Agricola Wind Project, Towns of Venice and Scipio, Cayuga County, New York (EDR, 2024j).	bne noiteM egebnonO noiteM eguyeO	behalf of Liberty Renewables	September 25,
Concurrence with Phase IB Archaeological Survey Addendum Memo and Archaeological Site Avoidance Plan (NYSPHO, 2024d).	EDR, Liberty Renewables	ОЧНЗҮИ	October 8, 2024

### References Cited

Environmental Design and Research, Landscape Architecture, Engineering, and Environmental Services, D.P.C. (EDR). 2021a. RE: Proposed Agricola Wind Project, Cultural Resources Surveys and Environmental Review. Correspondence from EDR to Cayuga Nation and Onondaga Nation. Via email, June 15, 2021.

EDR. 2021b. Request for Consultation, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York. Submitted to NYSHPO by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. June 16, 2021.

EDR. 2021c. Phase IA Archaeological Survey, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York. Prepared for Liberty Renewables by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. August 2021.

EDR. 2023. Phase IA Archaeological Survey, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York. Prepared for Liberty Renewables by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. May 22, 2023.

EDR. 2024a. Phase IA Historic Resources Survey Methodology, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York. Prepared for Liberty Renewables by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. April 25, 2024.

EDR. 2024b. Re: Cultural Resources Surveys and Environmental Review EDR Project #21029. Phase IA Report Consultation Letter from EDR to Anthony Gonyea (Onondaga Nation). Syracuse, NY. June 13, 2024

EDR. 2024c. Re: Cultural Resources Surveys and Environmental Review EDR Project #21029. Phase IA Report Consultation Letter from EDR to Chief Sam Georg and Clint Halftown (Cayuga Nation). Syracuse, NY. June 13, 2024

EDR. 2024d. Phase IB Archaeological Survey, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York. Prepared for Liberty Renewables by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. June 28, 2024.

EDR. 2024e. Re: Cultural Resources Surveys and Environmental Review EDR Project #21029. Phase IA Report Consultation Letter from EDR to Anthony Gonyea (Onondaga Nation). Syracuse, NY. July 9, 2024

EDR. 2024f. Re: Cultural Resources Surveys and Environmental Review EDR Project #21029. Phase IA Report Consultation Letter from EDR to Chief Sam Georg and Clint Halftown (Cayuga Nation). Syracuse, NY. July 9, 2024

EDR. 2024g. Historic Resources Survey Report, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York. Prepared for Liberty Renewables by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. August 8, 2024.

EDR. 2024h. Phase IB Archaeological Survey Addendum Memorandum, Agricola Wind Project, Towns of Venice and Scipio, Cayuga County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C. Syracuse, NY, September 2024.

EDR. 2024i. Re: Agricola Wind Project, Archaeological Site Avoidance Plan. Correspondence from EDR to NYSHPO. Via CRIS, September 19, 2024.

EDR. 2024j. RE: Agricola Wind Project. Correspondence from EDR to Onondaga Nation and Cayuga Nation. Via email, September 25, 2024.

EDR. 2024k. Unanticipated Discoveries Protocol, Towns of Venice and Scipio, Cayuga County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. October 2024.

Mew York State Office of Parks, Recreation and Historic Preservation (NYSHPO). 2021a. Re: ORES, Agricola Wind Project, Towns of Moravia, Scipio and Venice, Cayuga County, NY. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, June 21, 2021.

NYSHPO. 2021b. Review correspondence from James Carter (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, July 2, 2021.

NYSHPO. 2021c. Re: ORES, Agricola Wind Project, Towns of Moravia, Scipio and Venice, Cayuga County, NY. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, September 9, 2021.

NYSHPO. 2023. Re: ORES, Agricola Wind Project, Towns of Moravia, Scipio and Venice, Cayuga County, NY. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, May 30, 2023.

NYSHPO. 2024a. Re: ORES, Agricola Wind Project, Towns of Moravia, Scipio and Venice, Cayuga County, NY. Review correspondence from Virginia Bartos (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, April 26, 2024.

NYSHPO. 2024b. Re: ORES, Agricola Wind Project, Towns of Moravia, Scipio and Venice, Cayuga County, NY. Review correspondence from Virginia Bartos (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, July 17, 2024.

NYSHPO. 2024c. Re: ORES, Agricola Wind Project, Towns of Moravia, Scipio and Venice, Cayuga County, NY. Review correspondence from Robyn Sedgwick (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, September 10, 2024.

NYSHPO. 2024d. Re: ORES, Agricola Wind Project, Towns of Moravia, Scipio and Venice, Cayuga County, NY. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, October 8, 2024.



15, 2021

Clint Halftown Nation Representative

RE: Proposed Agricola Wind Project Cultural Resources Surveys and Environmental Review

Dear Mr. Halftown:

resources.

Liberty Renewables Inc. is currently planning, designing, and conducting environmental permitting studies for the proposed Agricola Wind Project and would like to invite the Cayuga Nation to begin a discussion about the project. This project is a proposed wind-powered electric generating facility (referred to herein as the Facility) in the Towns of Venice, Scipio, and Moravia in Cayuga lands and Figure 1 attached). We are aware that the Facility is partially located within ancestral Cayuga lands and would like to initiate a dialogue with the Nation regarding potential archaeological sites, historic properties, or other sensitive areas of concern.

The Facility would be built within an approximately 8,354-acre area (referred to herein as the Facility Area; see Figure 2 attached), which consists primarily of active agricultural land and forest and is roughly bound by Center Road to the north, Moravia-Venice Townline Road to the east, Austin Road to the south, and Stewart's Corners Road to the west.

At this time, we anticipate that the Facility will consist of up to 22 wind turbines, with a total generating capacity of up to 100 megawatts (MW), and associated infrastructure including a point-of-interconnection (POI) substation, meteorological towers, temporary laydown areas, collection lines, and access roads. Not all the land included in the Facility Area will ultimately be included in the Facility Site. Rather, the Facility Area represents the broader area within which selected parcels will be developed with Facility components. This provides flexibility during Facility development to minimize and avoid impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive and avoid impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive

Liberty Renewables Inc. is seeking a permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Section 94-c of the New York State Executive Law. Chapter XVIII Title 19 of NYCRR Part 900

Clint Halftown, Cayuga Nation Agricola Wind Project – Cultural Resources Surveys and Environmental Review June 15, 2027

establishes the procedural and substantive requirements for a Siting Permit Application under Section

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The Siting Permit Application prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. The cultural resources studies are being prepared on behalf of Liberty Renewables Inc. by Environmental Design & Research (EDR), an environmental consulting firm based in Syracuse, New York.

Liberty Renewables Inc. would like to request a meeting or series of meetings with the Nation to introduce the Facility, discuss archaeological and historic sites or other areas of concern, and respectfully requests the assistance of the Nation to identify, avoid, and minimize potential impacts to these sites.

Liberty Renewables Inc.'s Primary Point of Contact for the project is:

Mr. Andy MacCallum President Liberty Renewables Inc.

We have recently initiated preparing cultural resources studies for the Facility and are providing our preliminary schedule for these studies to facilitate discussion:

- Phase IA Archaeological Sensitivity Assessment/Archaeological Survey Research Design (anticipated submisison to the Nation in summer 2021)
- Phase IA Historic Resources Survey Methodology (summer 2021)
- Request for Information re: Visually Sensitive Areas or Sites (fall 2021)
- Phase IB Archaeological Fieldwork (anticipated to be conducted fall 2021 or spring 2022)
- Historic Resources Survey Fieldwork (fall 2021)
- Historic Resources Survey Report (spring 2022)
- Phase IB Archaeological Survey Report (spring 2022)
- Siting Permit Application submitted to ORES (2022)
- U.S. Army Corps of Engineers wetland permit review/Section 106 review (2022)

Clint Halftown, Cayuga Nation Agricola Wind Project – Cultural Resources Surveys and Environmental Review 15, 2021

We look forward to working with you and are confident that the Agricola Wind Project can be developed and built in a manner that is respectful of the Cayuga Nation's heritage.

Sincerely,

Grant Johnson Senior Project Manager – Historic Preservation Environmental Design & Research

Attachments:

- Figure 1. Regional Facility Location
- Figure 2. Facility Area



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# **Anthony Gonyea** Faithkeeper

RE: Proposed Agricola Wind Project Cultural Resources Surveys and Environmental Review

Dear Mr. Gonyea:

resources.

Liberty Renewables Inc. is currently planning, designing, and conducting environmental permitting studies for the proposed Agricola Wind Project and would like to invite the Onondaga Nation to begin a discussion about the project. This project is a proposed wind-powered electric generating facility (referred to herein as the Facility) in the Towns of Venice, Scipio, and Moravia in Cayuga County (see Figure 1 attached). We are aware that the Facility is located within ancestral Onondaga lands and would like to initiate a dialogue with the Nation regarding potential archaeological sites, historic properties, or other sensitive areas of concern.

The Facility would be built within an approximately 8,354-acre area (referred to herein as the Facility Area; see Figure 2 attached), which consists primarily of active agricultural land and forest and is roughly bound by Center Road to the north, Moravia-Venice Townline Roads to the east, Austin Road to the south, and Stewart's Corners Road to the west.

At this time, we anticipate that the Facility will consist of up to 22 wind turbines, with a total generating capacity of up to 100 megawatts (MW), and associated infrastructure including a point-of-interconnection (POI) substation, meteorological towers, temporary laydown areas, collection lines, and access roads. Not all the land included in the Facility Area within which selected parcels will be Sather, the Facility Area represents the broader area within which selected parcels will be developed with Facility components. This provides flexibility during Facility development to minimize and avoid impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive

Liberty Renewables Inc. is seeking a permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities

Anthony Gonyea, Onondaga Nation Agricola Wind Project – Cultural Resources Surveys and Environmental Review June 15, 2027

under Section 94-c of the New York State Executive Law. Chapter XVIII Title 19 of NYCRR Part 900 establishes the procedural and substantive requirements for a Siting Permit Application under Section 94-c.

The Siting Permit Application prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. The cultural resources studies are being prepared on behalf of Liberty Renewables Inc. by Environmental Design & Research (EDR), an environmental consulting firm based in Syracuse, New York.

Liberty Renewables Inc. would like to request a meeting or series of meetings with the Nation to introduce the Facility, discuss archaeological and historic sites or other areas of concern, and respectfully requests the assistance of the Nation to identify, avoid, and minimize potential impacts to these sites.

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- Historic Resources Survey Report (spring 2022)
- Phase IB Archaeological Survey Report (spring 2022)
- Siting Permit Application submitted to ORES (2022)
- U.S. Army Corps of Engineers wetland permit review/Section 106 review (2022)

Anthony Gonyea, Onondaga Nation Agricola Wind Project – Cultural Resources Surveys and Environmental Review June 15, 2027

We look forward to working with you and are confident that the Agricola Wind Project can be developed and built in a manner that is respectful of the Onondaga Nation's heritage.

Sincerely,

Grant Johnson Senior Project Manager – Historic Preservation Environmental Design & Research

Attachments:

• Figure 1. Regional Facility Location

Figure 2. Facility Area

CC: Alma Lowry, Attorney Joe Heath, Attorney

James Carter, Survey & National Register Unit :oT

Dr. Tim Lloyd, Archaeology Unit

New York State Office of Parks, Recreation and Historic Preservation

Division for Historic Preservation

Grant Johnson and Doug Pippin From:

Environmental Design & Research, Landscape Architecture, Engineering &

Environmental Services, D.P.C. (EDR)

1502,2021 Date:

Request for Consultation Reference:

Agricola Wind Project

Towns of Venice, Scipio, and Moravia, Cayuga County, New York

EDR Project No: 21029

Section 106 of the National Historic Preservation Act, as applicable. Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law, and/or Recreation and Historic Preservation (NYSHPO) to assist in their review of the Facility under memorandum is intended to initiate consultation with the New York State Office of Parks, and Moravia, Cayuga County, Mew York (see Figure 1). The information included in this major renewable energy electric generating facility to be located in the Towns of Venice, Scipio, prepared this request for consultation for the proposed Agricola Wind Project (or the Facility), a On behalf of Liberty Renewables, Inc. (or the Applicant), Environmental Design & Research (EDR)

#### Description of the Facility

authorized by Public Service Law Section 162.

of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law as components will be identified in detail in a forthcoming application to the New York State Office parcels within the Facility Area that will ultimately host the Facility components) and Facility depicted on Figures 1 and 2, respectively. The location of the Facility Site (the portions of the fields, fallow fields, woodlots, and wetlands. The regional Facility location and Facility Area are Area includes approximately 8,354 acres of private land, consisting primarily of open agricultural being evaluated to host the Facility infrastructure (Facility Area) are rural in nature. The Facility located within the Towns of Venice, Scipio, and Moravia in Cayuga County, New York. The lands facility consisting of up to 22 Wind Turbine Generators (WTGs) and associated infrastructure The proposed Agricola Wind Project is an up to 100-megawatt (MW) wind energy generating

## Archaeological Surveys

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As described in 19 NYCRR § 900-2.10 (Exhibit 9: Cultural Resources), a Section 94-c Application

- and related facilities on archeological/cultural resources within the project impact area $^{1}_{1}$ (a) A study of the impacts of the construction and operation of the facility, interconnections
- resources identified, addressing how those impacts shall be avoided or (1) A summary of the nature of the probable impact on any archeological/cultural :buːpnˌɔuː
- (2) If required pursuant to section 900-1.3(h) of this Part, a Phase IA .'pəzımınım
- (3) If required pursuant to section 900-1.3(h) of this Part, a Phase IB field study; archeological/cultural resources study for the proposed facility;
- (4) If required by the Phase I study results, as determined pursuant to section 900-
- integrity and significance of identified cultural resources; 1.3(h) of this Part, a Phase II site evaluation study to assess the boundaries,
- standards. archaeologist in accordance with the New York Archeological council (NYAC) archaeological or human remains and be prepared by a professional include a provision for work stoppage upon the discovery of possible importance are encountered during the excavation process. This plan shall unexpected event that resources of cultural, historical, or archaeological (5) An Unanticipated Discovery Plan that shall identify the actions to be taken in the

shifting the Facility components and by utilizing low-impact construction methods. used in constructing the Facility will minimize the need for soil disturbance wherever possible, by construction and operation. It is anticipated that the site design and construction elements to be resources due to their comparatively minimal amount of ground disturbance required during generation projects, utility-scale wind facilities present a lower risk for impacts to archaeological potential to impact archaeological resources. However, relative to other types of energy Proposed construction of the Facility will include ground disturbing activities that have the

(NYSHPO Guidelines)<sup>2</sup> and updated recommendations for Phase IA archaeological sensitivity NYSHPO has developed Guidelines for Wind Farm Development Cultural Resources Survey Work

memorandum as the Area of Potential Effect. Defined in 19 NYCRR § 900-2.10 as the project impact area (PIA), which is described for the purposes of this

Survey Work. New York State Historic Preservation Office, Waterford, NY. <sup>2</sup> New York State Historic Preservation Office (NYSHPO). 2006. Guidelines for Wind Farm Development Cultural Resources

models.<sup>3</sup> These include the following requirements for archaeological surveys for wind farm development:

The State Historic Preservation Office/Office of Parks, Recreation and Historic Preservation (SHPO/OPRHP) recommends that Phase IB archaeological testing is warranted for all areas of the project where ground disturbing activities are proposed and that are within areas of high sensitivity. Areas of ground disturbance include but are not necessarily limited to:

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- Office & Maintenance Facilities
- Staging Areas
- New Access Roads
- Buried Collection Lines
- Met Towers
- Areas of Grubbing and Grading

The SHPO defines areas of high sensitivity, where archaeological sites are most likely to be identified, as those: (1) within 100-meters (328 feet) of permanent water (rivers, streams, wetlands, ponds and lakes and hydric soils) and on slopes equal to or less than 12%; (2) within or near to known archaeological sites; and (3) locations of standing or demolished historic structures. Hydric soils are included to account for areas that may not be currently near water but were in the past. The 100-meter cut off from water is based on data presented by Robert E. Funk in his 1993 Archaeological Investigations in the Upper Susquehanna Valley, New York State. Testing should conform to the 1994 New York Archaeological Council Standards.

All other portions of the project area are considered to have low sensitivity for the presence of archaeological sites, including areas of previous ground disturbance. The SHPO has no archaeological concerns with low sensitivity areas and does not recommend Phase IB testing in these locations.

EDR reviewed the NYSHPO's Cultural Resource Information System (CRIS) database to identify previously recorded archaeological sites mapped within the Facility Area and a one-mile buffer. Based on a review of CRIS, there are no previously identified archaeological sites located within the Facility Area and a one-mile buffer.

In accordance with 19 NYCRR § 900-2.10 and the NYSHPO Guidelines for Wind Farm Development Cultural Resources Survey Work\* (the NYSHPO Wind Guidelines; NYSHPO, 2006) EDR will conduct

<sup>3</sup> NYSHPO. 2020. Phase IA Archaeological Survey Recommendations/Sensitivity Model. New York State Historic Presentation Office Materiord IV November 2020.

Preservation Office, Waterford, NY. November 2020. <sup>4</sup> NYSHPO. 2006. Guidelines for Wind Farm Development Cultural Resources Survey Work. New York State Historic Preservation Office, Waterford, NY.

REDACTED - Matter No. 23-00064 REDACTED - Matter No. 23-00064

a Phase IA Archaeological Survey for review and approval by NYSHPO. The purpose of the Phase IA Archaeological Survey is to:

- Define the Facility's Area of Potential Effect (APE) for Direct Effects relative to are pages and are presented as a page of the properties of
- archaeological resources<sup>5</sup>;

  Determine whether previously identified archaeological resources are located within the
- APE for Direct Effects;

  Develop an archaeological sensitivity model in accordance with the NYSHPO recommendations (NYSHPO 2020b), to define areas of elevated possibility for the

presence of cultural resources; and

• Propose a methodology to identify archaeological resources within the APE for Direct Effects (i.e., Phase IB subsurface testing), evaluate their eligibility for the State/National Register of Historic Places (S/NRHP), and assess the potential effect of the Facility on those resources.

All archaeological studies will be conducted under the supervision of a Registered Professional Archaeological Report Archaeological Report Format Requirements<sup>6</sup> and the NYSHPO Wind Guidelines as well as the New York Archaeological Council (NYAC) Standards for Cultural Resource Investigations and Curation of Archaeological Collections in New York State (the NYAC Standards).<sup>7</sup>

Historic Resources Surveys
As described in 19 NYCRR § 900-2.10 (Exhibit 9: Cultural Resources), a Section 94-c Application

(b) A study of the impacts on historic resources within the project impact area, including the results of field inspections, a review of the statewide inventory of historic property, and consultation with local historic preservation groups and federal/state-recognized Indian nations to identify sites or structures listed or eligible for listing in the State or National Register of Historic Places within the PIA, including an analysis of potential impact on any standing structures which appear to be at least fifty (50) years old and potentially eligible for listing in the State of National Register of Historic Places, based on an assessment by a qualified individual.

<sup>5</sup> It is anticipated that the APE for Direct Effects will change as the Facility's design advances and becomes more refined. <sup>6</sup> MYSHPO. 2005. New York State Historic Preservation Office (NYSHPO) Phase 1 Archaeological Report Format Requirements. New York State Historic Preservation Office, Waterford, MY.

New York Archaeological Council (NYAC). 1994. Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State. New York State Office of Parks, Recreation, and Historic Preservation,

Waterford, NY.

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Construction of the Facility is not anticipated to require the demolition or physical alteration of any aboveground historic properties. As the Facility is planned to be constructed almost entirely on open lands, no direct physical impacts to historic properties are anticipated to occur as a result of the Facility. Historically significant properties are defined herein to include buildings, districts, objects, structures and/or sites that have been listed on or have been determined eligible for listing in the S/NRHP.

The Facility's potential effect on aboveground historic resources may result in a change (resulting from the introduction of wind turbines or other Facility components) in the visual or auditory setting associated with a given historic property.

Therefore, the APE for Indirect Effects on historic resources must include those areas where Facility components (including wind turbines) will be visible and where there is a potential for a significant visual effect.

The NYSHPO Wind Guidelines request that cultural resources surveys for wind energy projects include consultation with NYSHPO to determine the scope and methodology to identify and evaluate historic resources. The NYSHPO Wind Guidelines suggest the completion of a preliminary historic resources survey of the areas located within one mile of the turbines where viewshed analysis indicates the Facility is potentially visible, to be followed by a meeting with NYSHPO staff in Albany to review the results of the preliminary survey. The purpose of this meeting is to allow determine S/NRHP eligibility. However, EDR's cultural resources staff have successfully undertaken numerous previous historic resources surveys for energy projects in New York State in close consultation with NYSHPO staff.<sup>8</sup> In these previous surveys, NYSHPO staff have concurred with S/NRHP eligibility of historic resources surveys for energy projects in New York State in close consultation with NYSHPO staff.<sup>8</sup> In these previous surveys, NYSHPO staff have concurred with S/NRHP eligibility of historic resources without the need for additional survey or justification. In recent correspondence related to other wind energy projects in New York, NYSHPO staff have confirmed that EDR does not need to conduct this initial one-mile survey and confirmation of

To ensure that potential visual effects on regional visually sensitive historic resources are adequately considered in the application process, and consistent with NYSHPO guidance, areas of potential Facility visibility within a 5-mile radius Historic Resources Study Area will be evaluated

<sup>8</sup> Previous projects reviewed by NYSHPO that have included historic resources surveys conducted by EDR include the Bluestone Wind Project (19PR01874), Heritage Wind Project (19PR01833), and High Bridge Wind Project (19PR01283). Each project involved the preparation of an historic resources survey methodology that was approved by NYSHPO and

methodology.

in all support studies related to aboveground historic resources (see Figure 3). The Historic Resources Study Area is defined as the area within 5 miles of the Facility's participating parcel boundaries (i.e., the Facility Area) and will be used for the purpose of identifying historic resources and evaluating visibility and potential visual impacts to those resources listed in or determined by NYSHPO to be eligible for listing in the S/NRHP.

As required by the NYSHPO Wind Guidelines, EDR will prepare a viewshed analysis to determine the potential geographic area of visibility, or APE for Indirect Effects. The APE for Indirect Effects on historic resources includes those areas where the Facility may result in indirect effects on cultural resources, such as visual or auditory impacts. As presently envisioned, the APE for Indirect Effects would be confined to areas where the Facility would be visible (based on a viewshed analysis considering only topography) or where noise created by the Facility would be noticeable.

A preliminary review of the CRIS website indicates that within the Historic Resources Study Area there are:



The location of these resources is depicted on Figure 4. It is anticipated that not all of these resources will fall within the APE for Indirect Effects and that, as a result, not all of the resources will be surveyed as part of historic resources surveys conducted for the Facility.

In accordance with 19 MYCRR § 900-2.10 and the MYSHPO Wind Guidelines, EDR will prepare a Phase IA Historic Resources Survey Methodology for review and approval by MYSHPO. The purpose of the Phase IA Historic Resources Survey Methodology is to:

- Propose an APE for Indirect Effects to serve as the basis for the historic resources survey<sup>9</sup>;
- Identify previously inventoried historic properties within the Facility's Historic Resources
   Study Areas and APE for Indirect Effects;

<sup>9</sup> The Facility's APE relative to potential visual impacts to historic resources may be revised in association with subsequent layout changes during the permitting process, which will be documented in the Phase IA Historic Resources Survey Methodology or Historic Resources Survey report that is anticipated to be prepared as subsequent steps in the consideration of the Facility's potential effect on historic properties.

REDACTED - Matter No. 23-03002 REDACTED - Matter No. 23-00064

• Consult municipalities as well as local stakeholders (such as municipal historians and regional historical societies) to identify locally significant historic properties within the

Historic Resources Study Area and APE for Indirect Effects; and Provide a scope of work for additional survey of historic properties within the Facility's Historic Resources Study Area and APE for Indirect Effects in accordance with the NYSHPO

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All historic resources surveys will be prepared by qualified architectural historians who meet the U.S. Secretary of Interior's Standards for Historic Preservation Projects (36 CFR Part 61) and in a manner consistent with the NYSHPO Wind Guidelines.

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EDR has provided this request for consultation to NYSHPO in advance of submitting cultural resources surveys for the Facility to ensure that the scope of the proposed surveys is consistent with SHPO's expectations. Please provide a formal response indicating SHPO's concurrence with and/or comments on the methodologies described herein.

If you have any questions/concerns or would like to discuss the information described herein, please contact Grant Johnson at <u>ajohnson@edrdpc.com</u> or Doug Pippin at <u>apippin@edrdpc.com</u>.

Grant Johnson

Senior Preservation - Historic Preservation

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

-strachments:

• Figure 1. Regional Facility Location

Figure 2. Facility Area

Figure 3. Historic Resources Study Area

Figure 4. Previously Identified Historic Resources

Basemap: Esri ArcGlS Online "World Street Map" map service.

Prepared June 15, 2021

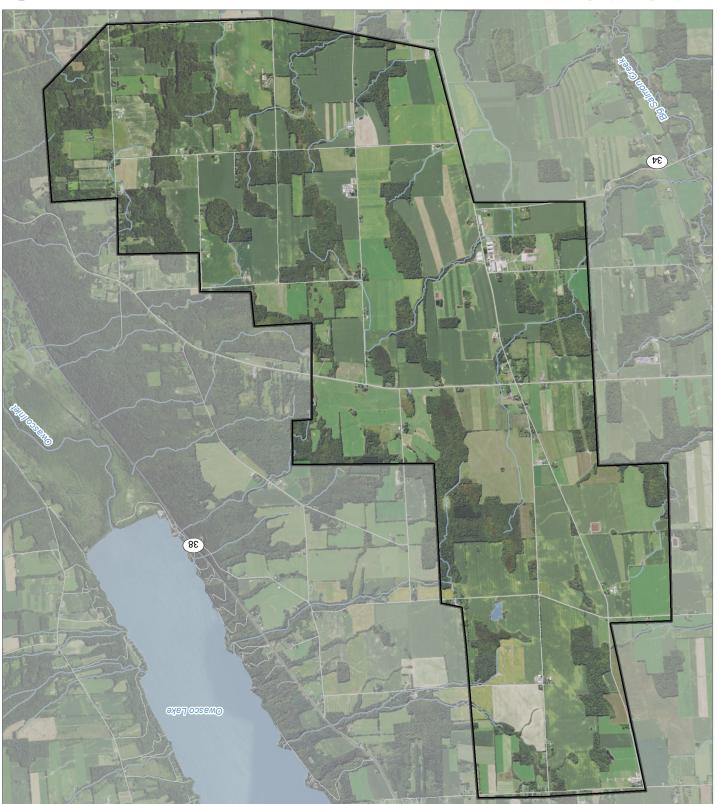
s∋liM

# Figure 1. Regional Facility Location



NYSHPO Consultation Memo

# Figure 2. Facility Area



Facility Area



000'7

2,000



Cayuga County, New York Towns of Venice, Scipio, and Moravia

NYSHPO Consultation Memo



Prepared June 15, 2021 Basemap: USDA NAIP "2019 New York 60cm" orthoimagery map

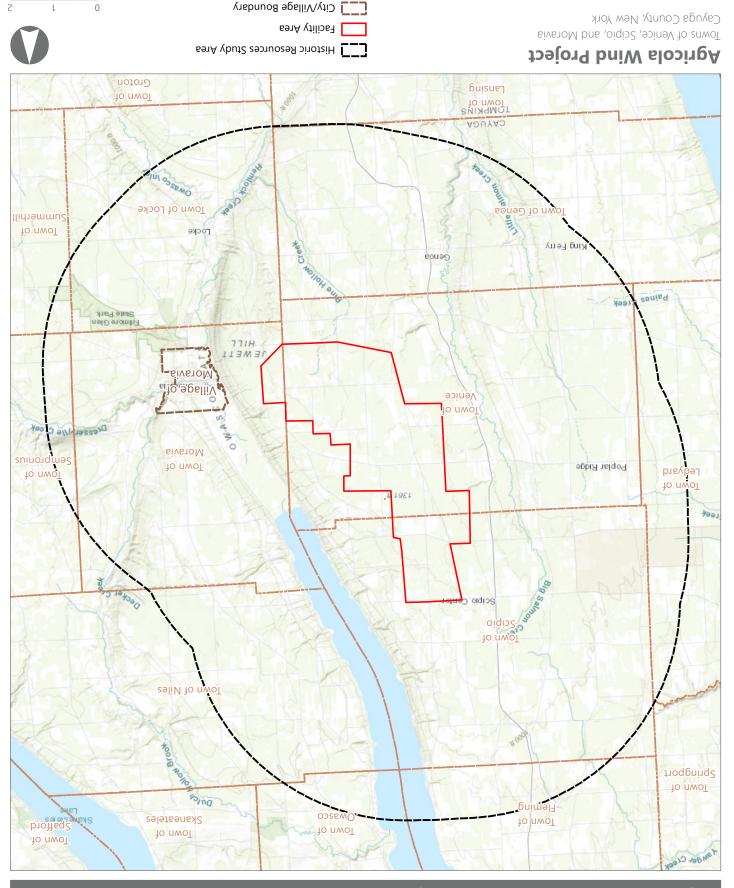


service.

Prepared June 15, 2021

Basemap: USDA NAIP "2019 New York 60cm" orthoimagery map

## Figure 3. Historic Resources Study Area



Town Boundary

NYSHPO Consultation Memo

service.

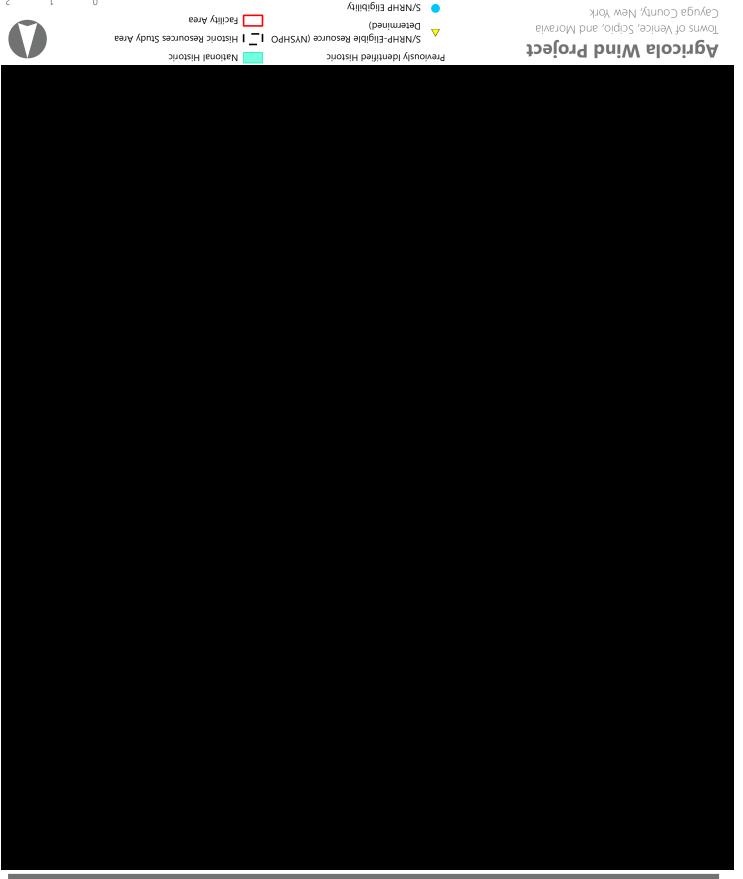
Prepared June 15, 2021

Basemap: USDA NAIP "2019 New York 60cm" orthoimagery map

## Figure 4. Previously Identified Historic Resources

EDB

NYSHPO Consultation Memo



S/NRHP-Listed

Historic District

S/NRHP Eligibility Undetermined

## and Historic Preservation Parks, Recreation,



Commissioner EBIK KOLLESEID

Governor ANDREW M. CUOMO

June 21, 2021

Environmental Design & Research Project Architectural Historian Andrew Roblee

Agricola Wind Project Re: **OKES** 

21PR03987 Towns of Moravia, Scipio and Venice, Cayuga County, NY

51029

#### Dear Andrew Roblee:

(719 Environmental Conservation Law Article 8) and its implementing regulations (5NYCRR Part review of the project pursuant to the State Environmental Quality Review Act (New York involved in or near your project. Such impacts must be considered as part of the environmental They do not include potential environmental impacts to New York State Parkland that may be are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments materials in accordance with the New York State Historic Preservation Act of 1980 (Section Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted Thank you for requesting the comments of the Division for Historic Preservation of the Office of

of the investigation. proposed Phase IA archaeological investigation. OPRHP looks forward to reading the results We have reviewed EDR's Memorandum dated June 15, 2021, and we concur with EDR's

containing polygons representing project components that involve ground disturbance. When project plans are available, OPRHP would like EDR to submit an ESRI shapefile

Review (PR) number noted above. If you have any questions, please contact me via email. If further correspondence is required regarding this project, please refer to the OPRHP Project

Sincerely,

Tim Lloyd, Ph.D.

Scientist - Archaeology

via e-mail only

dnestions. Thank you. at james, carter@parks, ny, gov with any may be eligible. Contact James Carter an assessment of any resources that consisting of an overview, context and supply the standard survey report tield work has been completed. Please sent at this time to be tultilled once request for the survey report will also be Trekker Manager, A separate CR15 via the Survey 123 app, as well as access to specific field inventory forms approval by SHPO, you will be granted browser window. After methodology Trekker Survey Submission in a separate button (green cog) which will open the snuvey area by clicking the process snivey Methodology and proposed you will first be asked to submit a eligible or listed. To begin the survey, identified CRIS resources that are age or older, as well as previously pnijgjiuds aug structures 50 years of boundary. This survey request is for eacy sige of the project area on GIS modeling within five-miles from above-ground historic resources based Please submit a Trekker survey of Rednest a New Trekker Survey Survey and Evaluation James Carter Information Requested bioject components Survey for this Consultation Project Please submit a shapefile showing the Attachment Request a New Attachment, Photo, or γιςμαθοιοάλ Dyold miT Information Requested IA archaeological investigation Survey for this Consultation Project Ατεπαθοίοση δυτνθγ Rednest a New Attachment, Photo, or Αιτηαθοίοθη Tim Lloyd Please submit the results of the Phase Information Requested Request Entity Review Type Request Description Request Item Request Type Reviewer Process Status Information Requests Please review the specific information request(s) below and click the Process button to respond buildings/structures/districts within or adjacent to your project area, we need further information. In order for SHPO to complete our evaluation of the historic significance of all Survey and Evaluation James Carter Please review the specific information request(s) below and click the Process button to respond Andrew, OPRHP concurs with EDR's proposed archaeological investigation (see attached letter). γιςμαθοιοάλ Tim Lloyd Review Type Review Responses Please accept the following information below as the consolidated response from NYS SHPO for the above referenced submission. Q View Project Project 21PR03987: Agricola Wind Project (PUU814QA3D3N) View and/or Address a Response Solo 💢 HOME SUBMIT SEARCH COMMUNICATE

# Parks, Recreation, and Historic Preservation

NEW YORK
STATE OF
OPPORTUNITY.

ERIK KULLESEID
Commissioner

KATHY HOCHUL

September 9, 2021

Andrew Roblee Project Architectural Historian Environmental Design & Research

Re: ORES

Agricola Wind Project Towns of Moravia, Scipio and Venice, Cayuga County, NY 21PR03987

### Dear Andrew Roblee:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources.

We have reviewed the report of the Phase IA archaeological investigation (215R00525). OPRHP requests the following report revisions.

On report Page 27, EDR states

EDR developed a GIS-based sensitivity model for the Facility Area to identify portions of the APE for Direct Effects which would be more likely to contain archaeological materials than others. Recent NYSHPO [OPRHP] guidance recommends the following criteria to define areas of Elevated Sensitivity for archaeological resources:

- 1. Portions of the Facility Area within 61 meters (200 feet) of a historically
- map-documented structure.

  2. Portions of the Facility Area within 100 meters (328 feet) of permanent water (rivers, streams, wetlands, ponds and lakes, and hydric soils) and on slopes equal to or less than 12 percent.
- 3. Portions of the Facility Area within 305 meters (1,000 feet) of known archaeological sites (defined as NYSHPO or NYSM sites).

Criterion Number 2 is OPRHP policy. Criteria Numbers 1 and 3 are not OPRHP policy. OPRHP requests that the report text be revised to be clear what is and is not OPRHP policy.

Andrew Roblee September 9, 2021 Page 2

Regarding Criterion Number 1, OPRHP concurs with EDR's use of 61 meters from mapdocumented structures in the definition of archaeological sensitivity.

Regarding Criterion Number 3, OPRHP does not concur with the use of 305 meters from known archaeological sites in the definition of archaeological sensitivity. Creating buffers around previously recorded archaeological sites for the purpose of guiding Phase IB subsurface testing is problematic and should be developed on a case-by-case basis. OPRHP request that Criterion 3 be removed from the report.

If further correspondence is required regarding this project, please refer to the OPRHP Project Review (PR) number noted above. If you have any questions, please contact me via email.

Sincerely,

Tim Lloyd, Ph.D.

Scientist - Archaeology

- Ilayo

via e-mail only



**ERIK KULLESEID**Commissioner

KATHY HOCHUL

Grant Johnson Senior Project Manager, Historic Preservation Environmental Design & Research

Re: ORES Waricola W

May 30, 2023

Agricola Wind Project Towns of Moravia, Scipio and Venice, Cayuga County, NY 21PR03987

Dear Grant Johnson:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources.

Thank you for revising the report of the Phase IA archaeological investigation (215R00525), as requested in the OPRHP's letter dated September 9, 2021. The OPRHP concurs with the report recommendations for Phase IB archaeological testing in areas of high archaeological sensitivity.

If further correspondence is required regarding this project, please refer to the OPRHP Project Review (PR) number noted above. If you have any questions, please contact me via email.

Sincerely,

Tim Lloyd, Ph.D. Scientist - Archaeology

via e-mail only

June 13, 2024



Clint Halftown Nation Representative

RE: Agricola Wind Project
Cultural Resources Surveys and Environmental Review
EDR Project #21029

Dear Mr. Halftown and Mr. George:

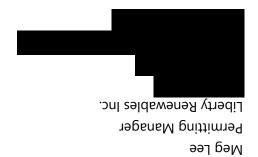
I am writing to provide the Cayuga Nation with the cultural resources survey documents for the proposed Agricola Wind Project in the Towns of Venice and Scipio, Cayuga County, New York (the Facility). As previously communicated in our introductory letter sent to you June 15, 2021, Liberty Renewables Inc is currently planning, designing, and conducting permitting studies for the Facility (please see attached Figures 1 and 2). This letter includes a brief description of the proposed scope of the Facility and a link to a SharePoint site where PDF copies of the cultural resources survey reports completed to date are available for review and comment by the Nation.

At this time, we anticipate that the Facility will consist of up to 24 wind turbines, with a total generating capacity of up to 99 megawatts (MW). Associated infrastructure will include a collection substation, a point-of-interconnection (POI) switchyard, an operations and maintenance (O&M) facility, two meteorological towers, an aircraft detection lighting system (ADLS) tower, collection lines, and access roads. Facility components will be sited on approximately 40 parcels of land that total approximately 4,000 acres in size (referred to herein as the Facility Site; see Figure 2 attached). Only a small proportion 4,000 acres in size (referred to herein as the Facility Site will ultimately be developed as part of the project.

Liberty Renewables Inc. is seeking a permit to construct the Facility from the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Section 94-c of the New York State Executive Law. Chapter XVIII Title 19 of NYCRR Part 900 establishes the procedural and substantive requirements for a Siting Permit Application under Section 94-c.

The Siting Permit Application prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies.

Liberty Renewables Inc. retained Environmental Design & Research (EDR) to undertake cultural resources studies for the Facility. Liberty Renewables Inc.'s Primary Point of Contact for the project is Meg Lee.



In May 2023, EDR prepared a Phase IA Archaeological Survey for the Facility.

The Phase IA Archaeological Survey is available as a PDF document for review and comment on a SharePoint site at this link: <u>2023-05 Agricola Wind Phase IA Archaeological Survey.pdf</u>

Phase IB archaeological survey fieldwork is currently in progress. When completed, EDR will notify the Nation via email and upload the Phase IB Archaeological Survey report to SharePoint. This report is expected to be available late spring/early summer 2024.

Upcoming anticipated project milestones include the following:

- Submission of the Section 94-c Siting Permit Application to ORES (Fall 2024)
- Submission of the Joint Application for Permit to the U.S. Army Corps of Engineers (Fall 2025)

We look forward to working with you and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at psittig@edrdpc.com or (919) 810-7066, or Doug Pippin at <a href="mailto:dpippin@edrdpc.com">dpippin@edrdpc.com</a> or (585) 752-6147.

We are confident that the Agricola Wind Project can be developed in a manner that is respectful of the Cayuga Nation's heritage.

Sincerely,

Peter Sittig

EDR Archaeology Project Manager

Jan a. Jilly

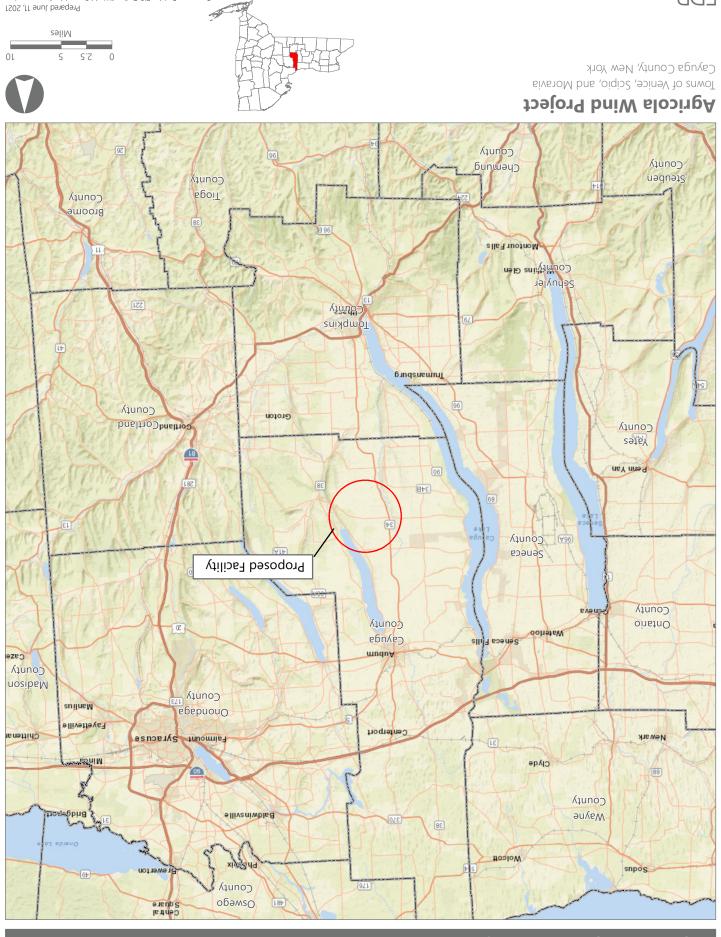
### Attachments:

- Figure 1. Regional Facility Location
- Figure 2. Facility Site

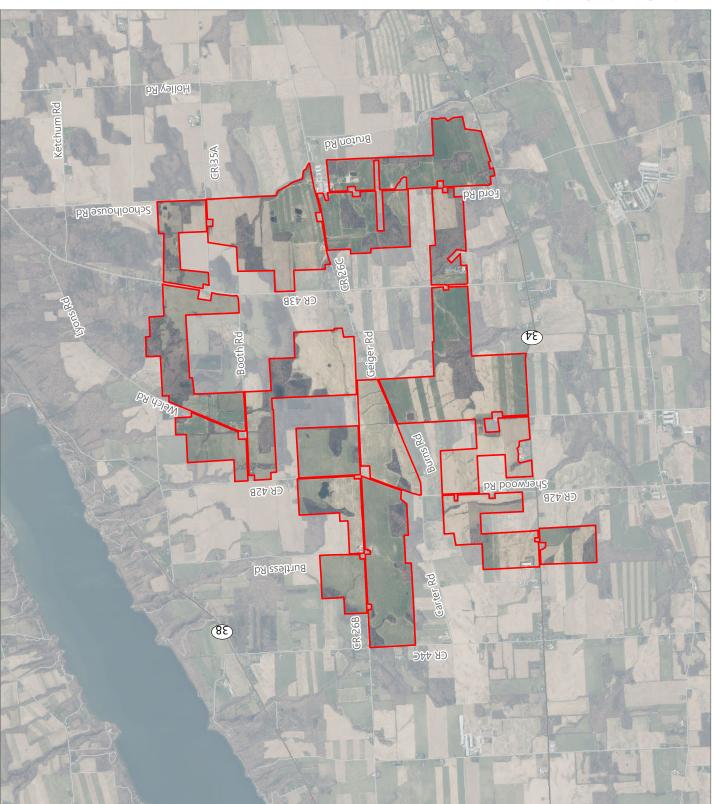
## Copy to (via email):

Bradley Russell, New York State Historic Preservation Office Tim Lloyd, New York State Historic Preservation Office Basemap: Esri ArcGlS Online "World Street Map" map service.

# Figure 1. Regional Facility Location



# Figure 2. Facility Site







## Agricola Wind Project

Towns of Venice and Scipio, Cayuga County, New York

Phase IA Archaeological Survey

s∍liM

June 13, 2024

106 Representative Anthony Gonyea

EDR Project #21029 Cultural Resources Surveys and Environmental Review Agricola Wind Project RE:

Dear Mr. Gonyea:

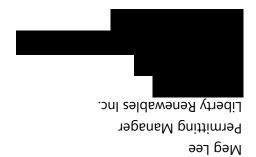
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- Submission of the Section 94-c Siting Permit Application to ORES (Fall 2024)
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We look forward to working with you and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at psittig@edrdpc.com or (919) 810-7066, or Doug Pippin at <a href="mailto:dpippin@edrdpc.com">dpippin@edrdpc.com</a> or (585) 752-6147.

We are confident that the Agricola Wind Project can be developed in a manner that is respectful of the Onondaga Nation's heritage.

Sincerely,

Peter Sittig

**EDR** Archaeology Project Manager

Jan a. Jilly

### Attachments:

- Figure 1. Regional Facility Location
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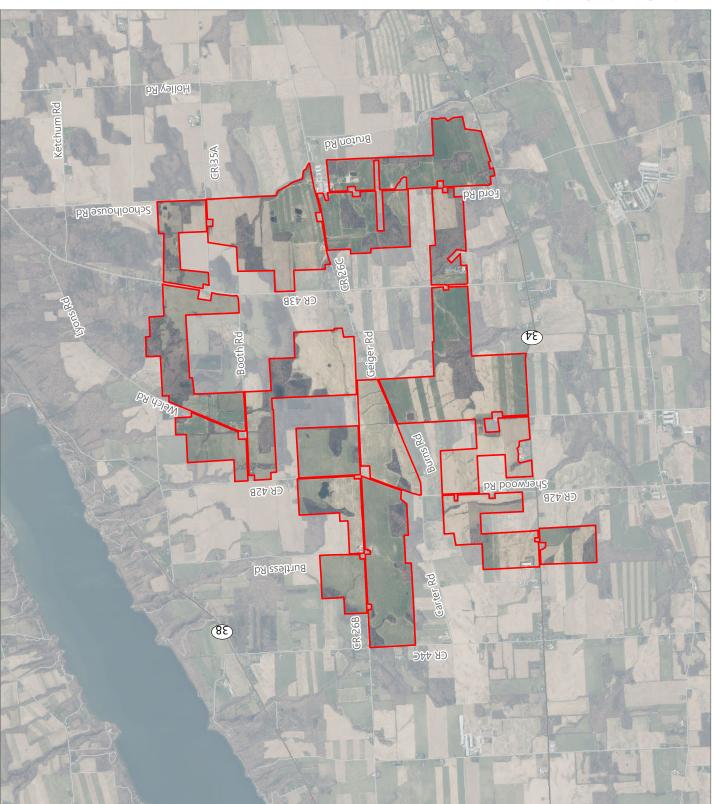
Bradley Russell, New York State Historic Preservation Office Tim Lloyd, New York State Historic Preservation Office Basemap: Esri ArcGlS Online "World Street Map" map service.

Prepared June 11, 2021

# Figure 1. Regional Facility Location



# Figure 2. Facility Site







# Agricola Wind Project

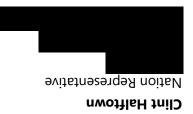
Towns of Venice and Scipio, Cayuga County, New York

Phase IA Archaeological Survey

s∍liM

July 9, 2024





RE: Agricola Wind Project
Cultural Resources Surveys and Environmental Review
Phase IB Archaeological Survey Report
EDR Project #21029

Dear Mr. Halftown and Chief George:

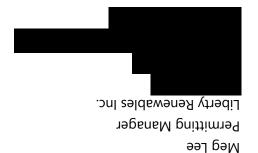
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Liberty Renewables Inc. is seeking a permit to construct the Facility from the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Article VIII of the New York State Executive Law. Chapter XVIII Title 19 of NYCRR Part 900 establishes the procedural and substantive requirements for a Siting Permit Application under Article VIII.

The Siting Permit Application prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies.

Liberty Renewables Inc. retained Environmental Design & Research (EDR) to undertake cultural resources studies for the Facility. Liberty Renewables Inc.'s Primary Point of Contact for the project is Meg Lee.



In June 2024, EDR prepared a Phase IB Archaeological Survey for the Facility.

The Phase IB Archaeological Survey is available as a PDF document for review and comment on a SharePoint site at this link: 2024-07-05 Agricola Wind Phase IB Archaeological Survey Report.pdf

Upcoming anticipated project milestones include the following:

- Submission of the Section 94-c Siting Permit Application to ORES (Fall 2024)
- Submission of the Joint Application for Permit to the U.S. Army Corps of Engineers (Fall 2025)

We look forward to working with you and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at <a href="mailto:psi:rigmedrdpc.com">psi:rigmedrdpc.com</a> or (919) 810-7066, or Doug Pippin at <a href="mailto:dpi:rigmedrdpc.com">dpi:rigmedrdpc.com</a> or (585) 752-6147.

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Sincerely,

Peter Sittig

EDR Archaeology Project Manager

The ditte

### Attachments:

Phase IB Archaeological Report

### Copy to (via email):

Kristy Primeau, Office of Renewables Energy Siting Bradley Russell, New York State Historic Preservation Office Tim Lloyd, New York State Historic Preservation Office

July 9, 2024



EDR Project #21029 Phase IB Archaeological Survey Report Cultural Resources Surveys and Environmental Review Agricola Wind Project RE:

Dear Mr. Gonyea:

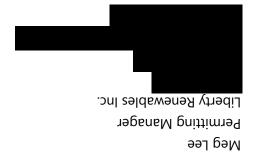
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Upcoming anticipated project milestones include the following:

- Submission of the Section 94-c Siting Permit Application to ORES (Fall 2024)
- Submission of the Joint Application for Permit to the U.S. Army Corps of Engineers (Fall 2025)

We look forward to working with you and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at psittig@edrdpc.com or (919) 810-7066, or Doug Pippin at <a href="mailto:dpippin@edrdpc.com">dpippin@edrdpc.com</a> or (585) 752-6147.

We are confident that the Agricola Wind Project can be developed in a manner that is respectful of the Onondaga Nation's heritage.

Sincerely,

Peter Sittig

**EDR** Archaeology Project Manager

John O. Jilly:

### Attachments:

Phase IB Archaeological Survey Report

### Copy to (via email):

Kristy Primeau, Office of Renewable Energy Siting Bradley Russell, New York State Historic Preservation Office Tim Lloyd, New York State Historic Preservation Office



**⊠** Close

Project 21PR03987: Agricola Wind Project (HSL59P9T94T4)

√ View Project

√

Please accept the following information below as the consolidated response from NYS SHPO for the above referenced submission.

	was submitted, we need further information. Please review the specific information request(s) below and click the Process button to respond to each request.
Survey and Evaluation	In order for SHPO to fully review and process the survey that
Review Type	gesbouse
	to the to Et proposition

Rednest Description	Request Item	Rednest Entity	Request Type	Review Type	Reviewer	Status	rocess
Please upload the complete.  Trekker burveys are complete.	Attachment	Historic Resources Survey, Agricola Wind Project, Towns of Venrice and Sciplo, Cayuga County, New York (245800220)	Request a New Attachment for an Existing Survey	Survey and Evaluation	Virginia Bartos	Information Requested	



**RANDY SIMONS** 

Governor КАТНҮ НОСНИГ

Commissioner Pro Tempore

July 17, 2024

Environmental Design & Research Senior Project Manager, Historic Preservation Grant Johnson

Re: **ORES** 

21PR03987 Towns of Moravia, Scipio and Venice, Cayuga County, NY Agricola Wind Project

Dear Grant Johnson:

involved in or near your project. They do not include potential environmental impacts to New York State Parkland that may be those of the Division for Historic Preservation and relate only to Historic/Cultural resources. 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are materials in accordance with the New York State Historic Preservation Act of 1980 (Section Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted Thank you for requesting the comments of the Division for Historic Preservation of the Office of

deposits. However, due to the association of sites were identified, all of which represent report states that We have reviewed the report of the Phase IB archaeological survey (No. 245R00350). The

deposits with the same map documented structure, the OPRHP combined EDR's

OPRHP's recommendations are listed

below.

OPRHP concurs with the report recommendation that further ground disturbance at all identified archaeological sites be avoided. If ground disturbance cannot be avoided at one or more of the archaeological sites, then a Phase II investigation must be conducted to assess the potential eligibility of the site(s) for listing in the State and National Registers of Historic Places.

The report states that the project proponent's intention is to avoid further disturbance to all identified archaeological sites through project redesign. The report graphics show a relocation of the project's ground disturbing activities that will result in no ground disturbances at identified archaeological sites. Therefore, it is OPRHP's opinion that no additional archaeological work is necessary.

If further correspondence is required regarding this project, please refer to the OPRHP Project Review (PR) number noted above. If you have any questions, please contact me via email.

Sincerely,

Tim Lloyd, Ph.D.

Scientist - Archaeology

Iland

via e-mail only



**RANDY SIMONS** 

Governor КАТНҮ НОСНИГ

Commissioner Pro Tempore

September 10, 2024

Environmental Design & Research Senior Project Manager, Historic Preservation Grant Johnson

Re: ORES

21PR03987 Towns of Moravia, Scipio and Venice, Cayuga County Agricola Wind Project

Dear Grant Johnson:

(006 pursuant to Executive Law Section 94-c and its implementing regulations (19 NYCRR Part resources. Such impacts must be considered as part of the environmental review of the project comments are those of the Division for Historic Preservation and relate only to Historic/Cultural 14.09 of the New York State Parks, Recreation and Historic Preservation Law). These materials in accordance with the New York State Historic Preservation Act of 1980 (Section Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted Thank you for requesting the comments of the Division for Historic Preservation of the Office of

It is the OPRHP's opinion that the project, as described, will have an Adverse Impact on historic by the proposed undertaking. Please see Appendix A for a complete list of impacted resources. or listed in the State and National Registers of Historic Places have the potential to be impacted Resources Survey Report. Based on that review, it appears that 148 historic resources eligible We have reviewed the submission received on August 8, 2024, including the submitted Historic

additional archaeological work is necessary. to all identified archaeological sites through project redesign, it is the OPRHP's opinion that no report and graphics indicate that the project proponent's intention is to avoid further disturbance eligibility of the site(s) for listing in the State and National Registers of Historic Places. As the archaeological sites, then a Phase II investigation must be conducted to assess the potential archaeological sites be avoided. If ground disturbance cannot be avoided at one or more of the OPRHP concurs with the report recommendation that further ground disturbance at all identified Our Archaeology Unit has completed their review of the Phase IB archaeological survey.

should begin to develop a mitigation plan. In order to develop a mitigation plan that contains those resources resulting from this project. In order to move the project forward, the applicant At this time, we have concluded our evaluation of eligible resources and the potential impacts to

meaningful mitigation measures, we recommend reaching out to a variety of history-based organizations within the impacted communities. The plan should establish specific preservation/history project and/or funding intended to offset what this office believes will be significant visual impacts associated with this undertaking. Once a mitigation plan is developed and agreed upon, it will be memorialized and outlined in \$900-2.10 Exhibit 9 Revised, and included in the final Cultural Resource Avoidance, Minimization and Mitigation Plan (CRAMMP) submitted to the Office of Renewable Energy Siting for review and approval in compliance with submitted to the Office of Renewable Energy Siting for review and approval in compliance with submitted to the Office of Renewable Denergy Siting for review and approval in compliance with submitted to the Office of Renewable Denergy Siting for review and approval in compliance with submitted to the Office of Renewable Denergy Siting for review and approval in compliance with submitted to the Office of Renewable Denergy Siting for review and approval in compliance with submitted to the Office of Renewable Denergy Siting for review and approval in compliance with submitted to the Office of Renewable Denergy Siting for review and approval in compliance with submitted to the Denergy Siting for the Denergy Sit

If you have any questions, you can call or e-mail me at the contact information below.

Sincerely,

Robyn Sedgwick Historic Site Restoration Coordinator

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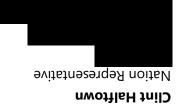
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September 25, 2024





RE: Agricola Wind Project
Cultural Resources Surveys and Environmental Review
Phase IB Archaeological Survey Report Addendum
EDR Project #21029

Dear Mr. Halftown and Chief George:

I am writing to provide the Cayuga Nation with supplemental cultural resources survey documents for the proposed Agricola Wind Project, which is being developed by Liberty Renewables Inc. in the Towns of Venice and Scipio, Cayuga County, New York (the Facility). The proposed Facility is an approximately supporting infrastructure, which will include access roads, collection lines, an aircraft detection lighting supporting infrastructure, which will include access roads, collection substation, and an associated system, a meteorological tower, temporary laydown yards, a collection substation, and an associated point-of-interconnection (POI), as well as other Facility components.

In the summer of 2024, slight changes to the layout and design of the Facility were made that required the completion of the additional cultural resource surveys. These surveys were completed in the summer of 2024 by Environmental Design & Research (EDR) and a Phase IB Archaeological Survey Addendum for the Facility was developed. This report is provided with this letter for review and comment by the Nation.

As described in our July 9, 2024 letter, Liberty Renewables Inc. is seeking a permit to construct the Facility from the Office of Renewable Energy Siting and Electric Transmission (ORES), which issues permits for major renewable energy facilities under Article VIII of the New York State Executive Law. Chapter XI, Title 16 of NYCRR Part 1100 establishes the procedural and substantive requirements for a Siting Permit Application under Article VIII.

Upcoming anticipated project milestones include the following:

- Filing of the Article VIII Siting Permit (Fall 2024)
- Submission of the Joint Permit Application to the U.S. Army Corps of Engineers (Winter 2026)

7066, or Doug Pippin at <a href="mailto:dpippin@edrdpc.com">dpippin@edrdpc.com</a> or (585) 752-6147. questions or would like additional information, please contact me at psittig@edrdpc.com or (919) 810-We look forward to working with you and appreciate your review and/or comments. If you have any

the Cayuga Nation's heritage. We are confident that the Agricola Wind Project can be developed in a manner that is respectful of

Sincerely,

Peter Sittig

**EDR** Archaeology Project Manager

#### :A frachment A:

Phase IB Archaeological Report Addendum

### Copy to (via email):

Kristy Primeau, Office of Renewables Energy Siting Bradley Russell, New York State Historic Preservation Office Tim Lloyd, New York State Historic Preservation Office

September 25, 2024

Anthony Gonyea 106 Representative

RE: Agricola Wind Project
Cultural Resources Surveys and Environmental Review
Phase IB Archaeological Survey Report Addendum
EDR Project #21029

Dear Mr. Gonyea:

I am writing to provide the Onondaga Nation with supplemental cultural resources survey documents for the proposed Agricola Wind Project, which is being developed by Liberty Renewables Inc. in the Towns of Venice and Scipio, Cayuga County, New York (the Facility). The proposed Facility is an approximately 99-megawatt wind-powered electric generating facility and will consist of up to 24 wind turbines and supporting infrastructure, which will include access roads, collection lines, an aircraft detection lighting system, a meteorological tower, temporary laydown yards, a collection substation, and an associated point-of-interconnection (POI), as well as other Facility components.

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Sincerely,

Peter Sittig

**EDR** Archaeology Project Manager

## :A trachment A:

Phase IB Archaeological Report Addendum

### Copy to (via email):

Kristy Primeau, Office of Renewables Energy Siting Bradley Russell, New York State Historic Preservation Office Tim Lloyd, New York State Historic Preservation Office



**RANDY SIMONS** 

Governor КАТНҮ НОСНИГ

Re:

Commissioner Pro Tempore

October 8, 2024

Senior Project Manager, Historic Preservation Grant Johnson

786E0A915 Towns of Moravia, Scipio and Venice, Cayuga County, MY Agricola Wind Project **ORES** 

Dear Grant Johnson:

should be conducted.

involved in or near your project. They do not include potential environmental impacts to New York State Parkland that may be those of the Division for Historic Preservation and relate only to Historic/Cultural resources. 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are materials in accordance with the New York State Historic Preservation Act of 1980 (Section Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted Thank you for requesting the comments of the Division for Historic Preservation of the Office of

disturbance of the site be avoided. If avoidance is not possible, then a Phase II site evaluation The OPRHP concurs with the report recommendation that further was identified during the addendum survey, consisting of The addendum archaeological survey was conducted due to a change in the project plans. We have reviewed the Phase IB Archaeological Survey Addendum Memo (No. 24SR00519).

sites through project redesign. proposes to avoid further disturbance of 245R00350). The report of the initial Phase IB survey stated that the project proponent previously identified during the project's initial Phase IB archaeological survey (No. Were As detailed in the OPRHP letter dated الله ۲۱, ۵۵۲4, ا

The OPRHP concurs with that recommendation, but we also sites. The Plan proposes the establishment of a identified during the addendum Phase IB survey, for a total IB survey, and 19, 2024. The Plan addresses the sites identified during the initial Phase The OPRHP has also reviewed the Archaeological Avoidance Plan (the Plan), dated September

recommend that

Unanticipated Discovery Plan (UDP). The OPRHP concurs with that recommendation. The Plan also recommends the creation and implementation of a cultural resources

concerns regarding the project's potential impacts to archaeological resources. If the Plan and the UDP are implemented as the OPRHP recommends, we have no remaining

Mitigation Plan should be directed to OPRHP's Robyn Sedgwick. Mitigation Plan (see OPRHP letter dated September 10, 2024). Questions regarding the impact to above ground historic architectural resources, and we requested the development of a Please note that the OPRHP previously determined that the project will result in an adverse

Review (PR) number noted above. If you have any questions, please contact me via email. If further correspondence is required regarding this project, please refer to the OPRHP Project

Sincerely,

. a.hq ,byol miT

Scientist - Archaeology

via e-mail only