

**Project Name:** Agricola Wind Project  
**EDR Project No:** 21029  
**Prepared By:** Kristen Olson; Matthew Weiss  
**Date:** October 8, 2024

**Summary of Cultural Resources-Related Correspondence**

Date	Sender	Recipient(s)	Content
June 15, 2021	EDR on behalf of Liberty Renewables	Cayuga Nation (CN), Onondaga Nation (ON)	Project introduction letter and maps (EDR, 2021a).
June 15, 2021	EDR on behalf of Liberty Renewables	NYSHPO	Formal consultation initiated with NYSHPO via the Cultural Resources Information System (CRIS) website (EDR, 2021b).
June 21, 2021	NYSHPO	EDR, Liberty Renewables	Response to initial request for consultation and request for a Phase IA Archaeological Survey (NYSHPO, 2021a).
July 2, 2021	NYSHPO	EDR, Liberty Renewables	Response to initial request for consultation and request for a historic resources survey work plan (NYSHPO, 2021b).
August 30, 2021	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IA Archaeological Survey, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York</i> (EDR, 2021c).
September 9, 2021	NYSHPO	EDR, Liberty Renewables, ORES	Request for revisions to the Phase IA Archaeological Survey (NYSHPO, 2021c).
May 22, 2023	EDR on behalf of Liberty Renewables	NYSHPO	Submission of Revised Phase IA Archaeological Survey (EDR, 2023).
May 30, 2023	NYSHPO	EDR, Liberty Renewables	Approval of the Revised Phase IA Archaeological Survey (NYSHPO, 2023).

Date	Sender	Recipient(s)	Content
April 25, 2024	EDR on behalf of Liberty Renewables	NYSHPPO	Phase IA Historic Resources Survey Methodology (EDR, 2024a).
April 26, 2024	NYSHPPO	EDR, Liberty Renewables	Approval of the Phase IA Historic Resources Survey Methodology and request for a historic resources survey report (NYSHPPO, 2024a).
June 13, 2024	EDR on behalf of Liberty Renewables	Cayuga Nation (CN), Onondaga Nation (ON)	Phase IA Report Consultation Letter to Nations (EDR, 2024b and EDR, 2024c).
June 28, 2024	EDR on behalf of Liberty Renewables	NYSHPPO	Phase IB Archaeological Survey (EDR, 2024d).
July 9, 2024	EDR on behalf of Liberty Renewables	Cayuga Nation (CN), Onondaga Nation (ON)	Phase IB Report Consultation Letter to Nations (EDR, 2024e and EDR, 2024f).
July 17, 2024	NYSHPPO	EDR, Liberty Renewables	Concurrence with Phase IB Archaeological Survey (NYSHPPO, 2024b).
August 8, 2024	EDR on behalf of Liberty Renewables	NYSHPPO	Historic Resources Survey Report (EDR, 2024g).
September 10, 2024	NYSHPPO	EDR, Liberty Renewables	Determination of Adverse Impact to aboveground historic resources and request for a historic preservation mitigation plan (NYSHPPO, 2024c).
September 19, 2024	EDR on behalf of Liberty Renewables	NYSHPPO	Phase IB Archaeological Survey Addendum Memo, Agricola Wind Project, Towns of Venice and Scipio, Cayuga County, New York (EDR, 2024h).
September 19, 2024	EDR on behalf of Liberty Renewables	NYSHPPO	Archaeological Site Avoidance Plan (EDR, 2024i).

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

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.



New 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.

June 15, 2021

**Clint Halftown**

Nation Representative

[Redacted]  
[Redacted]  
[Redacted]

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

Dear Mr. Halftown:

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 County (see 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 resources.

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, 2021

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.

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 submission 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 Haltown, Cayuga Nation  
Agricola Wind Project – Cultural Resources Surveys and Environmental Review  
June 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

June 15, 2021

**Anthony Gonyea**

Faithkeeper

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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

Dear Mr. Gonyea:

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 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 resources.

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, 2021

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.

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

Mr. Andy MacCallum  
President  
Liberty Renewables Inc.  
[REDACTED]  
[REDACTED]  
Phone: 902-877-5622

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

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

**To:** James Carter, Survey & National Register Unit  
Dr. Tim Lloyd, Archaeology Unit  
New York State Office of Parks, Recreation and Historic Preservation  
Division for Historic Preservation

**From:** Grant Johnson and Doug Pippin  
Environmental Design & Research, Landscape Architecture, Engineering &  
Environmental Services, D.P.C. (EDR)

**Date:** June 15, 2021

**Reference:** Request for Consultation  
Agricola Wind Project  
Towns of Venice, Scipio, and Moravia, Cayuga County, New York

**EDR Project No:** 21029

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

**Description of the Facility**

The proposed Agricola Wind Project is an up to 100-megawatt (MW) wind energy generating facility consisting of up to 22 Wind Turbine Generators (WTGs) and associated infrastructure located within the Towns of Venice, Scipio, and Moravia in Cayuga County, New York. The lands being evaluated to host the Facility *infrastructure* (Facility Area) are rural in nature. The Facility Area includes approximately 8,354 acres of private land, consisting primarily of open agricultural fields, fallow fields, woodlots, and wetlands. The regional Facility location and Facility Area are depicted on Figures 1 and 2, respectively. The location of the Facility Site (the portions of the parcels within the Facility Area that will ultimately host the Facility components) and Facility components will be identified in detail in a forthcoming application to the New York State Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law as authorized by Public Service Law Section 162.



**Archaeological Surveys**

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

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

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

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

<sup>1</sup> Defined in 19 NYCRR § 900-2.10 as the project impact area (PIA), which is described for the purposes of this memorandum as the Area of Potential Effect.

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

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:

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

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 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 Archaeologist (RPA) in a manner consistent with the NYSHPO *Phase I 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 must include:

(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 PLA, 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. NYSHPO, 2005. *New York State Historic Preservation Office (NYSHPO) Phase I Archaeological Report Format Requirements*. New York State Historic Preservation Office, Waterford, NY.

<sup>7</sup> 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.

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 NYSHPO the opportunity to verify the evaluation criteria being used by the consultant to 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 EDR staff's proposed survey methodologies, and recommendations regarding the potential 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 methodology.

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 (17PR01874), Heritage Wind Project (18PR01833), and High Bridge Wind Project (19PR01283). Each project involved the preparation of an historic resources survey methodology that was approved by NYSHPO and resulted in a historic resources survey.

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 NYCRR § 900-2.10 and the NYSHPO *Wind Guidelines*, EDR will prepare a Phase IA Historic Resources Survey Methodology for review and approval by NYSHPO. 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.

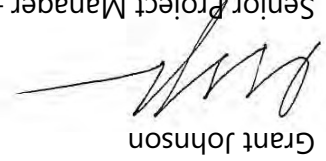
- Consult municipalities as well as local stakeholders (such as municipal historians and regional historical societies) to identify locally significant historic properties within the Historic Resources Study Area and APE for Indirect Effects; and
- Provide a scope of work for additional survey of historic properties within the Facility's Historic Resources Study Area and APE for Indirect Effects in accordance with the NYSHPO *Wind Guidelines*.

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*.

### Summary

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 [gjohnson@edrdpc.com](mailto:gjohnson@edrdpc.com) or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com).

Grant Johnson  


Senior Project Manager – Historic Preservation  
Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C.

### Attachments:

- Figure 1. Regional Facility Location
- Figure 2. Facility Area
- Figure 3. Historic Resources Study Area
- Figure 4. Previously Identified Historic Resources



Figure 1. Regional Facility Location



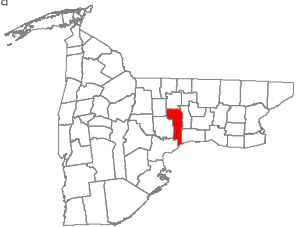
## Agricola Wind Project

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

*NYSHIPPO Consultation Memo*

EDR

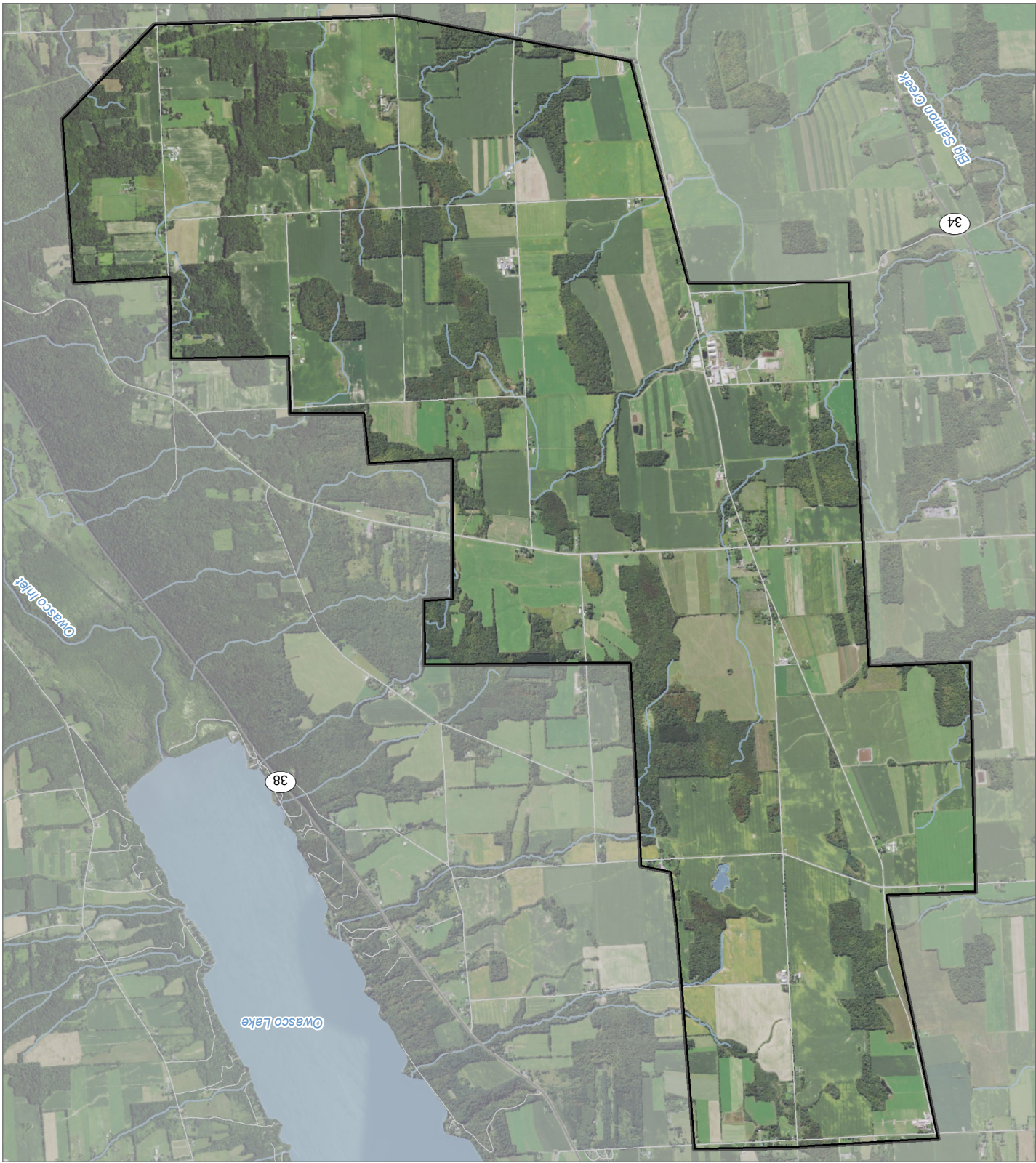
0 2.5 5 10  
Miles



Base map: Esri ArcGIS Online "World Street Map" map service.  
Prepared June 15, 2021



Figure 2. Facility Area



## Agricola Wind Project

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

*NYSHPO Consultation Memo*

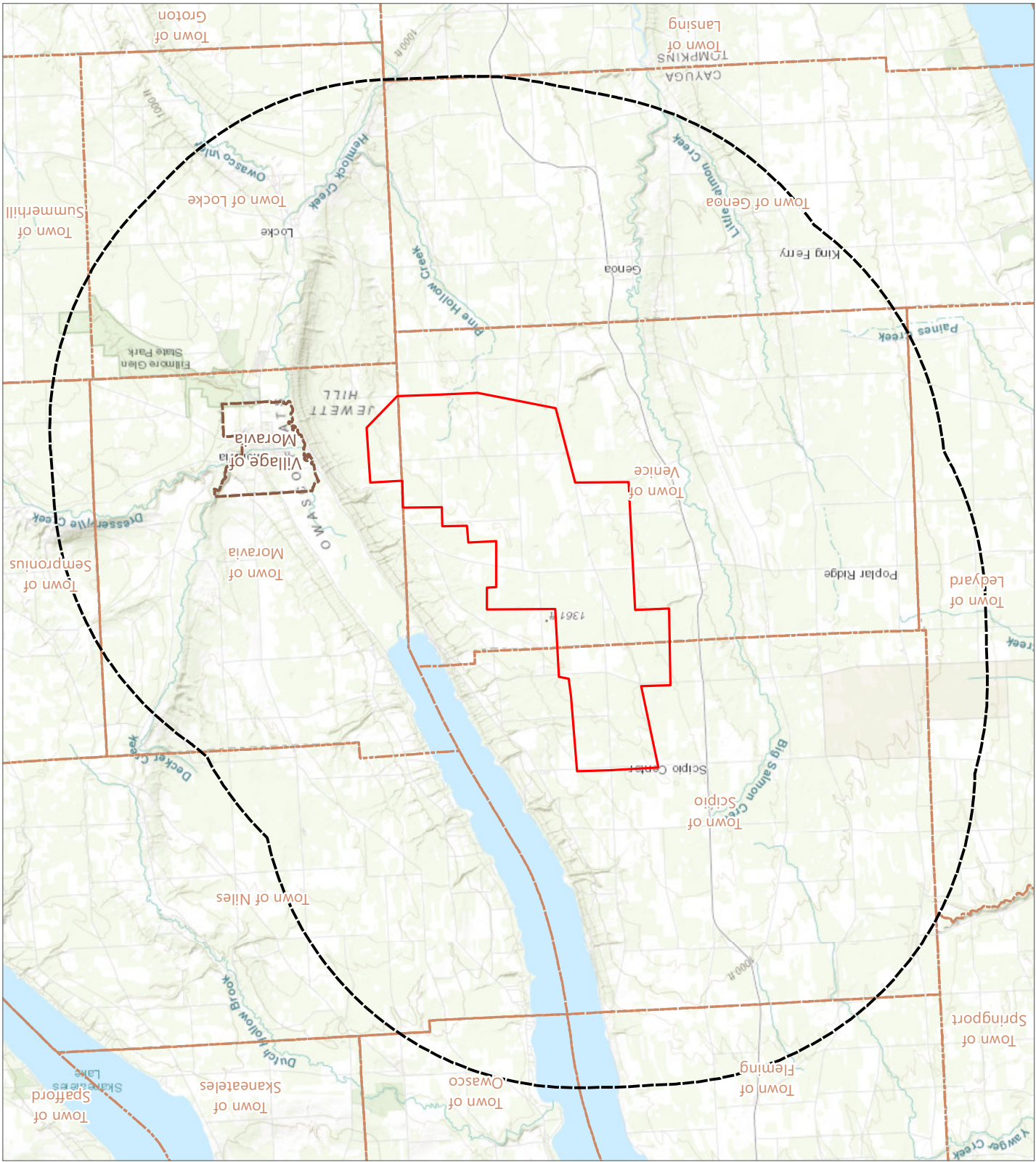
Facility Area

0 2,000 4,000  
Feet





Figure 3. Historic Resources Study Area

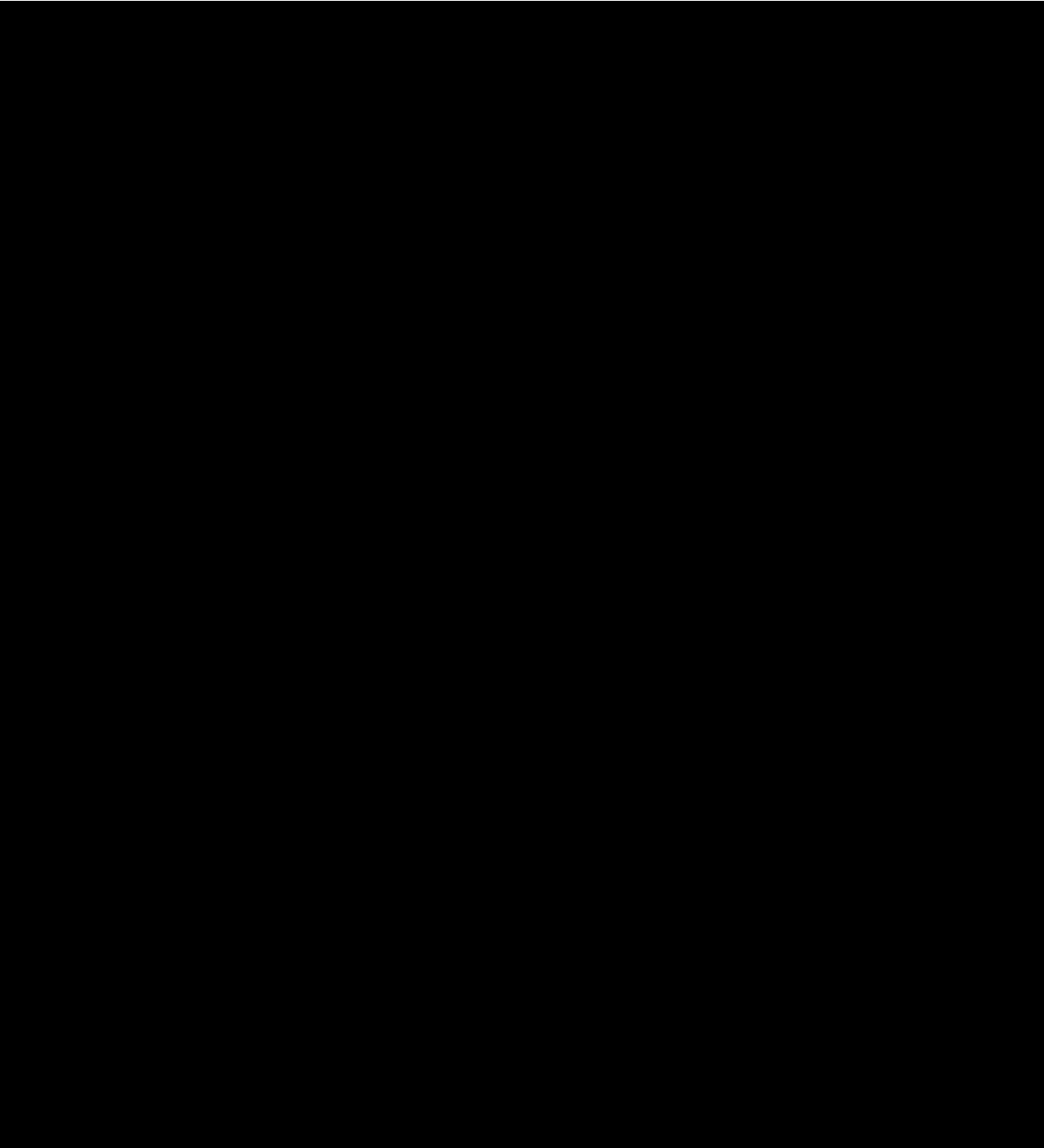


## Agicola Wind Project

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

NYSHPO Consultation Memo

Figure 4. Previously Identified Historic Resources




# Agriicola Wind Project


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


*NYSHPO Consultation Memo*


Previously Identified Historic


National Historic


 Historic Resource (NYSHPO


 S/NRHP-Eligible Resource (Determined)

 S/NRHP Eligibility

 S/NRHP Eligibility Undetermined

 Historic District

 S/NRHP-Listed

 Facility Area



Base map: USDA NALP "2019 New York 60cm" orthoimagery map  
Prepared June 15, 2021  
service.

June 21, 2021

Andrew Roblee  
Project Architectural Historian  
Environmental Design & Research



Re: ORES

Agricola Wind Project  
Towns of Moravia, Scipio and Venice, Cayuga County, NY  
21PR03987  
21029

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. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (5NYCRR Part 617).

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

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

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

Close

View and/or Address a Response

Project 21PR03987: Agricola Wind Project (PU08J4QA3D3N)

View Project

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

Reviewer Responses	
Reviewer	Tim Lloyd
Review Type	Archaeology
Response	Andrew: OPRHP concurs with EDR's proposed archaeological investigation (see attached letter). Please review the specific information request(s) below and click the Process button to respond to each request.  In order for SHPO to complete our evaluation of the historic significance of all buildings/structures/districts within or adjacent to your project area, we need further information. Please review the specific information request(s) below and click the Process button to respond to each request.

Information Requests	
Process Status	
Reviewer	Tim Lloyd
Review Type	Archaeology
Request Type	Request a New Attachment, Photo, or Survey for this Consultation Project
Request Entity	Request a New Trekker Survey
Request Item	Attachment
Request Description	Please submit the results of the Phase I archaeological investigation  Please submit a shapefile showing the project components  Please submit a Trekker survey of above-ground historic resources based on GIS modeling within five-miles from each side of the project area boundary. This survey request is for buildings and structures 50 years of age or older, as well as previously identified CRIS resources that are eligible or listed. To begin the survey, you will first be asked to submit a survey methodology and proposed survey area by clicking the process button (green cog) which will open the Trekker survey submission in a separate browser window. After methodology approval by SHPO, you will be granted access to specific field inventory forms via the Survey123 app, as well as Trekker Manager. A separate CRIS request for the survey report will be sent at this time to be fulfilled once field work has been completed. Please supply the standard survey report and consisting of an overview, context and an assessment of any resources that may be eligible. Contact James Carter or James.Carter@ports.ny.gov with any questions. Thank you.



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 (21SR00525). 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 map-documented 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,

A handwritten signature in black ink, appearing to read "Tim Lloyd", written over a white background.

Tim Lloyd, Ph.D.  
Scientist - Archaeology



via e-mail only



KATHY HOCHUL Governor  
ERIK KULLESEID Commissioner

May 30, 2023

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



Re: ORES  
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 (21SR00525), 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

**Chief Sam George**

Cayuga National Council

Dear Mr. Halftown and Mr. George:

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

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 of the land included in 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.

Meg Lee  
Permitting Manager  
Liberty Renewables Inc.



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: [2023-05 Agricola Wind Phase IA Archaeological Survey.pdf](#)

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](mailto:psittig@edrdpc.com) or (919) 810-7066, or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com) 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,

A handwritten signature in black ink, appearing to read "Peter Sittig".

Peter Sittig  
EDR Archaeology Project Manager

**Attachments:**

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

**Copy to (via email):**

Tim Lloyd, New York State Historic Preservation Office  
Bradley Russell, New York State Historic Preservation Office

Figure 1. Regional Facility Location



## AgriCola Wind Project

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

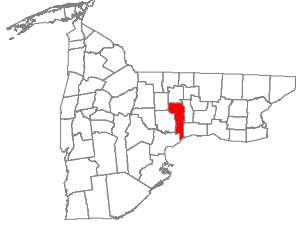
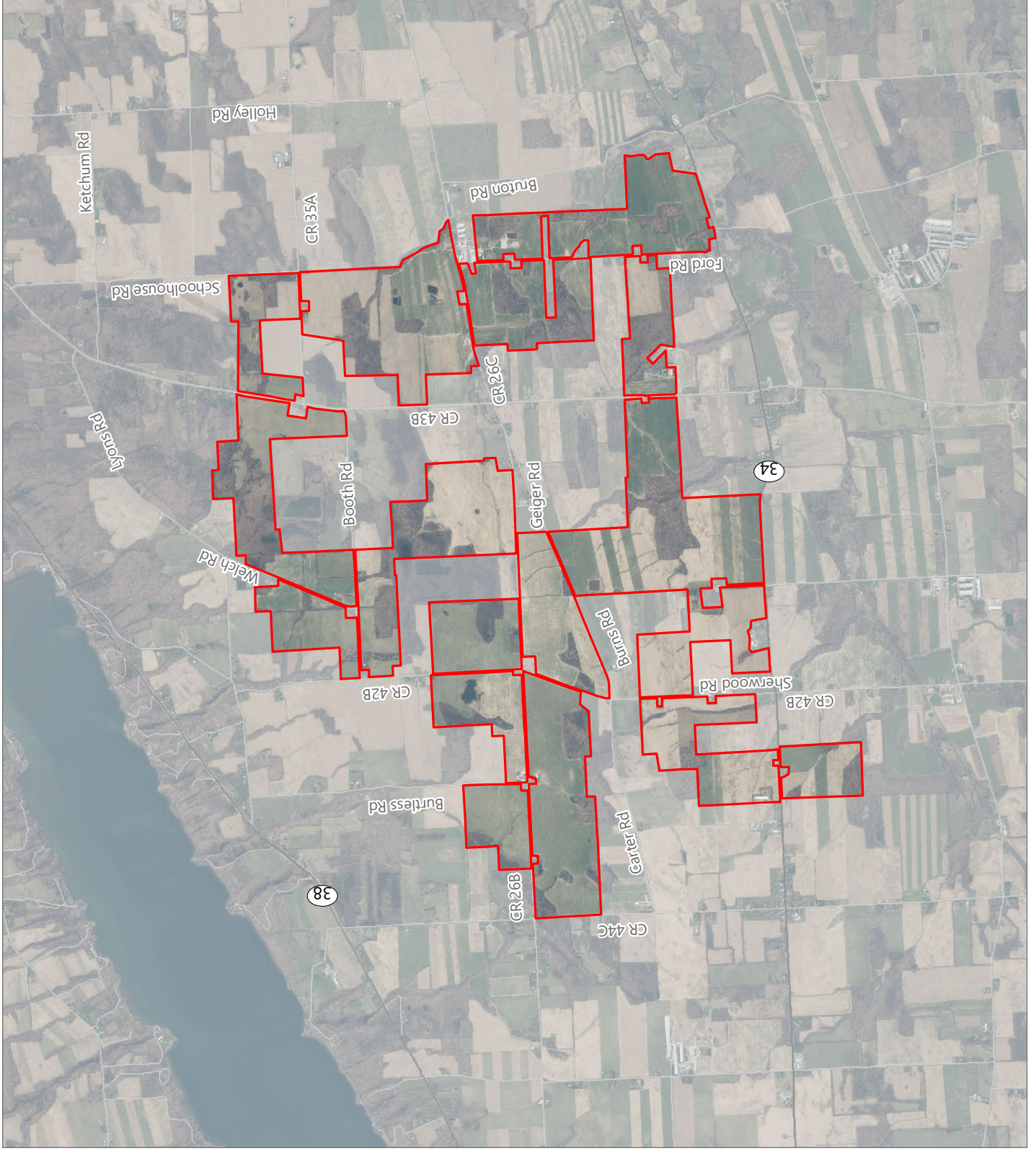




Figure 2. Facility Site



## Agricola Wind Project

Towns of Venice and Scipio,  
Cayuga County, New York

Phase 1A Archaeological Survey

Facility Site



June 13, 2024

**Anthony Gonyea**  
106 Representative



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

Dear Mr. Gonyea:

I am writing to provide the Onondaga Nation with the cultural resources survey documents for the proposed Agrícola 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.


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Meg Lee  
Permitting Manager  
Liberty Renewables Inc.



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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](mailto:psittig@edrdpc.com) or (919) 810-7066, or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com) or (585) 752-6147.

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Sincerely,



Peter Sittig

EDR Archaeology Project Manager

**Attachments:**

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

**Copy to (via email):**

Tim Lloyd, New York State Historic Preservation Office  
Bradley Russell, New York State Historic Preservation Office



Figure 1. Regional Facility Location



## AgriCola Wind Project

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

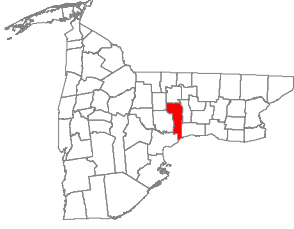
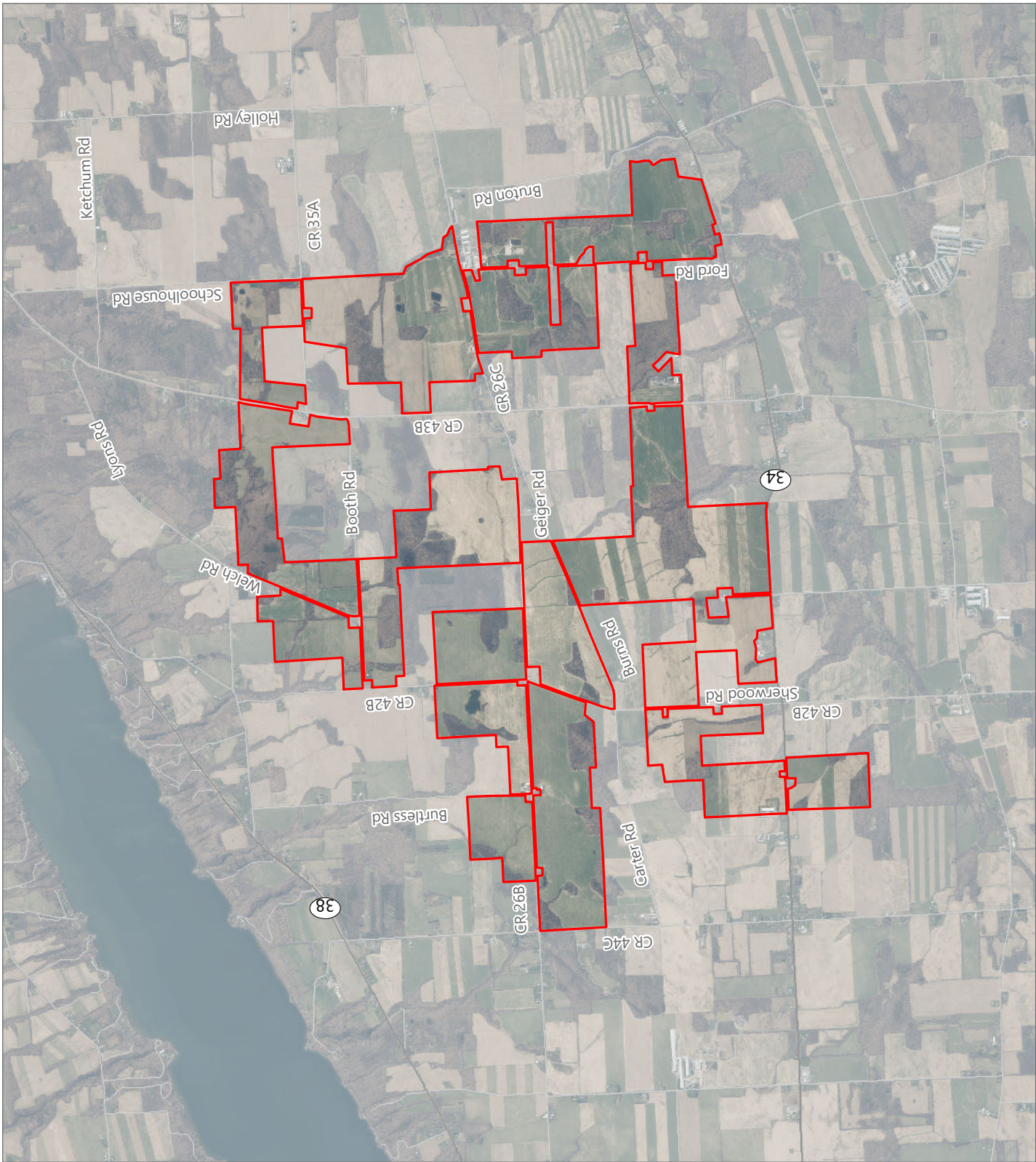




Figure 2. Facility Site



# Agrícola Wind Project

Towns of Venice and Scipio,  
Cayuga County, New York

Phase 1A Archaeological Survey

Facility Site

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July 9, 2024

**Clint Halftown**

Nation Representative

**Chief Sam George**

Cayuga National Council

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

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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.

Meg Lee  
Permitting Manager  
Liberty Renewables Inc.



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

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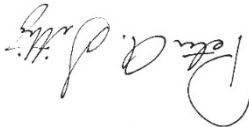
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Sincerely,



Peter Sittig  
EDR Archaeology Project Manager

**Attachments:**

- Phase IB Archaeological Report

**Copy to (via email):**

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

July 9, 2024

**Anthony Gonyea**  
106 Representative



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

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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.

Meg Lee  
Permitting Manager  
Liberty Renewables Inc.



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](#)

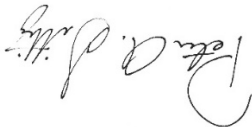
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- Submission of the Joint Application for Permit to the U.S. Army Corps of Engineers (Fall 2025)

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](mailto:psittig@edrdpc.com) or (919) 810-7066, or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com) 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

**Attachments:**

- Phase IB Archaeological Survey Report

**Copy to (via email):**

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







KATHY HOCHUL Governor  
RANDY SIMONS Commissioner Pro Tempore

July 17, 2024

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



Re: ORES  
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. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project.

We have reviewed the report of the Phase IB archaeological survey (No. 24SR00350). The report states that [redacted] sites were identified, all of which represent [redacted] deposits. However, due to the association of [redacted] deposits with the same map documented structure, the OPRHP combined EDR's [redacted] 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,

A handwritten signature in black ink, appearing to read "Tim Lloyd", written over a white background.

Tim Lloyd, Ph.D.  
Scientist - Archaeology



via e-mail only

September 10, 2024

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

Re: ORES  
Agricola Wind Project  
Towns of Moravia, Scipio and Venice, Cayuga County  
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 State Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. Such impacts must be considered as part of the environmental review of the project pursuant to Executive Law Section 94-c and its implementing regulations (19 NYCRR Part 900).

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

Our Archaeology Unit has completed their review of the Phase IB archaeological survey. 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. As the report and graphics indicate that the project proponent's intention is to avoid further disturbance to all identified archaeological sites through project redesign, it is the OPRHP's opinion that no additional archaeological work is necessary.

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

Division for Historic Preservation

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 19 NYCRR §§ 900-10.1(a) and 900-10.2(g).

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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<https://parks.ny.gov/shpo>

Appendix A



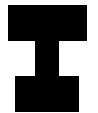





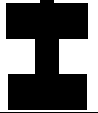





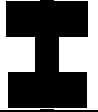





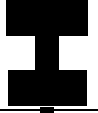





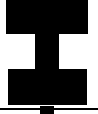





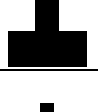




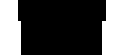
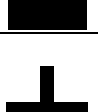





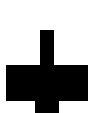





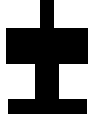









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08NR05844	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP- Listed	S/NRHP- Listed	listed	listed
05NR05510	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP- Listed	N/A	listed	listed
05NR05509	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP- Listed	N/A	listed	listed
94NR00534	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP- Listed	S/NRHP- Listed	listed	listed
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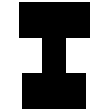



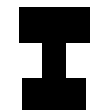



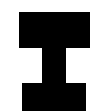


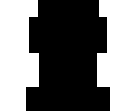
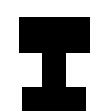



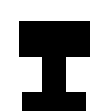



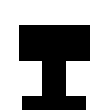



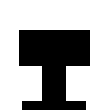



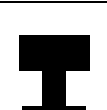



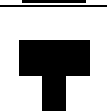


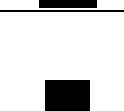
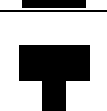



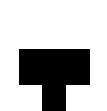


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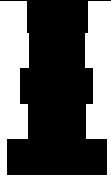


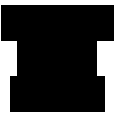



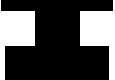
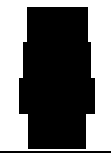

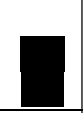
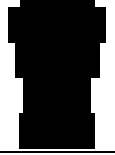


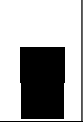



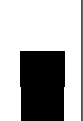

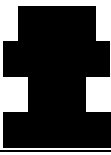


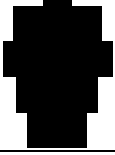
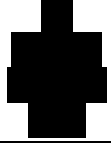

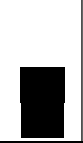

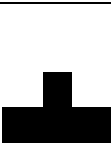





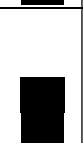



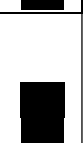



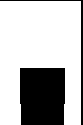

<https://parks.ny.gov/shpo>

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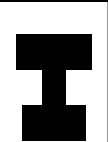



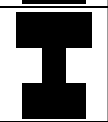



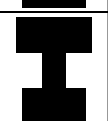


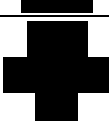
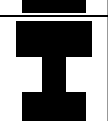



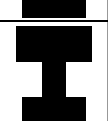



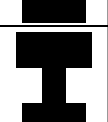
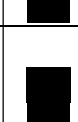
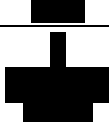
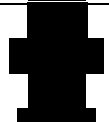
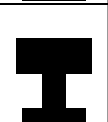


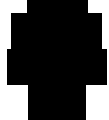
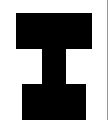



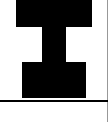
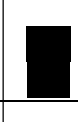





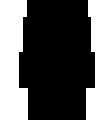
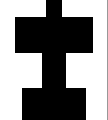


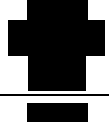
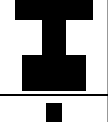


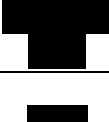
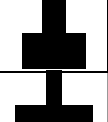
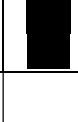
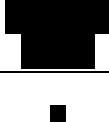
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Division for Historic Preservation


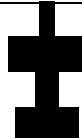
















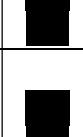


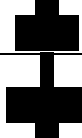
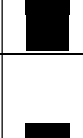

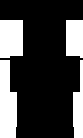
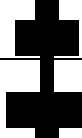
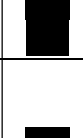






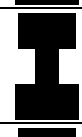








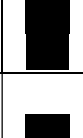


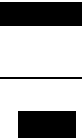

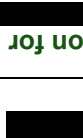
Division for Historic Preservation

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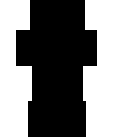
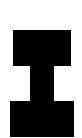
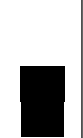

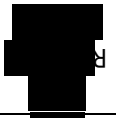
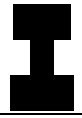
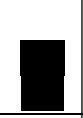


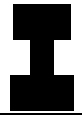
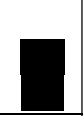

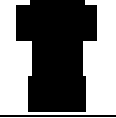
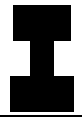
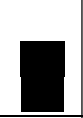

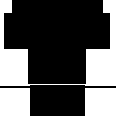

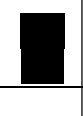

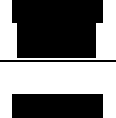
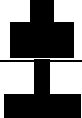

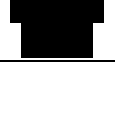
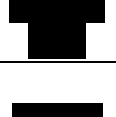
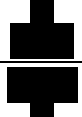
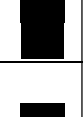

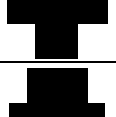
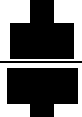
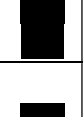

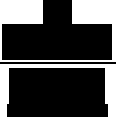
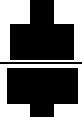
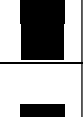
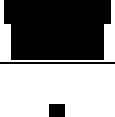
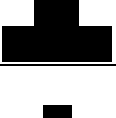
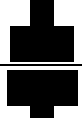
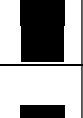
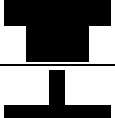
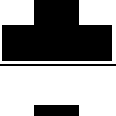
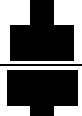
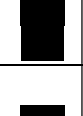
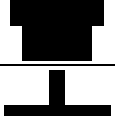
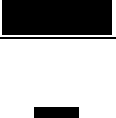
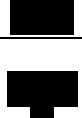
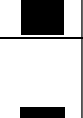

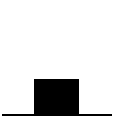

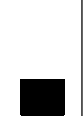


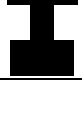




N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
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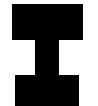



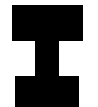



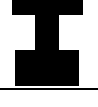

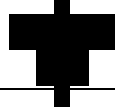

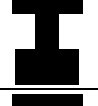








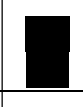


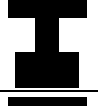
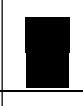

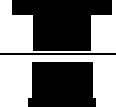
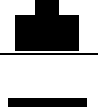


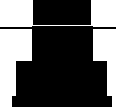
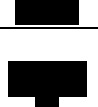
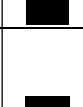
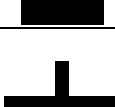
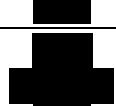
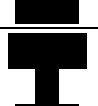

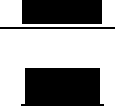

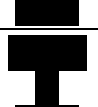

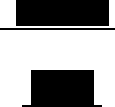

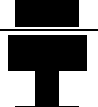

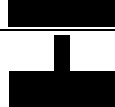
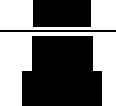
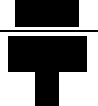
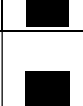





Division for Historic Preservation

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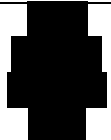







Division for Historic Preservation

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Division for Historic Preservation

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N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible

Division for Historic Preservation

N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
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N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	Eligible

September 25, 2024

**Clint Halftown**

Nation Representative

**Chief Sam George**

Cayuga National Council

**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 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.

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:

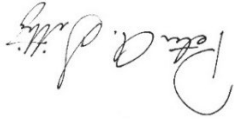
- Filing of the Article VIII Siting Permit (Fall 2024)
- Submission of the Joint Permit Application to the U.S. Army Corps of Engineers (Winter 2026)



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](mailto:psittig@edrdpc.com) or (919) 810-7066, or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com) 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

**Attachment A:**

- Phase IB Archaeological Report Addendum

**Copy to (via email):**

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

September 25, 2024

**Anthony Gonyea**

106 Representative



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

Dear Mr. Gonyea:

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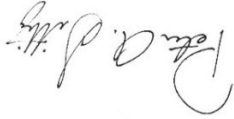
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- Submission of the Joint Permit Application to the U.S. Army Corps of Engineers (Winter 2026)

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](mailto:psittig@edrdpc.com) or (919) 810-7066, or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com) or (585) 752-6147.

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Sincerely,



Peter Sittig

**EDR** Archaeology Project Manager

**Attachment A:**

- Phase IB Archaeological Report Addendum

**Copy to (via email):**

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



KATHY HOCHUL Governor  
RANDY SIMONS Commissioner Pro Tempore

October 8, 2024

Grant Johnson  
Senior Project Manager, Historic Preservation

Re: ORES  
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. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project.

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

As detailed in the OPRHP letter dated July 17, 2024, [REDACTED] were previously identified during the project's initial Phase IB archaeological survey (No. 24SR00350). The report of the initial Phase IB survey stated that the project proponent proposes to avoid further disturbance of [REDACTED] sites through project redesign.

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

recommend that

The Plan also recommends the creation and implementation of a cultural resources

Unanticipated Discovery Plan (UDP). The OPRHP concurs with that recommendation.

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

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

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