



Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

October 4, 2019

Joe Green
Community Energy, Inc.
3 Radnor Corporate Center
100 Matsonford Road
Radnor, PA 19087
(via CRIS email)

Re: PSC
Mohawk Solar Project/90.5 MW/2,361-530 Acres
Canajoharie & Minden, Montgomery County
17PR06371 / 17-F-0182

Dear Mr. Green:

Thank you for your continued consultation with the Office of Parks, Recreation and Historic Preservation's Division for Historic Preservation (DHP). We continue to review this undertaking in accordance with Section 14.09 of New York State Parks, Recreation and Historic Preservation Law (NYSPRHPL).

These comments are those of the DHP 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 (6 NYCRR Part 617).

Our office has completed its review of the previously submitted Phase IB archaeological survey and those comments were submitted to you by letter dated September 13.

Regarding our analysis of potential impacts to buildings and historic viewsheds, we noted that your consultant has identified 11 individual properties and 1 large historic district that were previously listed in the New York State and National Registers of Historic Places. An additional 24 individual properties and 1 historic district were identified as being eligible for inclusion in the Registers. (See attached) One of these properties, the G. Bowerman Farm, is directly impacted by the undertaking.

As defined by Section 14.09 (NYSPRHPL) regulations; *"adverse impacts occur under conditions which include but are not limited to (a) destruction or alteration of all or part of a property; (b) isolation or alteration of its surrounding environment; (c) introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting; or (d) neglect of property resulting in its deterioration or destruction. Every agency shall fully explore all feasible and prudent alternatives and give due consideration to feasible and prudent plans which avoid or mitigate adverse impacts on such property."*

Regarding item (c) above, the regulations do not define "setting." However, the National Park Service's Bulletin 15: How to Apply the National Register Criteria for Evaluation provides the state

with the following guidance: “*Setting is the physical environment of a historic property... Setting refers to the character of the place in which a property played its historic role.*” (NPSB 15, page 45)

The proposed undertaking will be organized into 37 separate arrays throughout the 2,360-acre project area. The arrays themselves will physical occupy and visually alter roughly 530 of those acres.

The rows are relatively low in profile reaching at the upper edge less than 11-12 feet in height from the ground. However, the concern will be the regimented linear industrial-looking rows that may be visible from the National Register listed and eligible properties. The project area’s landscape is generally open and agricultural in character. This rural setting is an important character-defining feature associated with the historic properties.

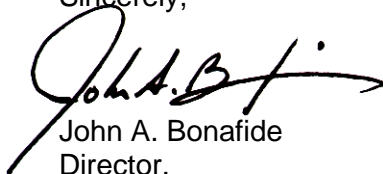
The proposed long regimented rows of black, semi-reflective panels may be highly visible in the areas of the historic resources. We found that the large solar arrays with their industrial form and scale will be incongruous with the surrounding natural agricultural setting. In addition, potential glare and reflectivity at various times of the day are also of concern. As such, our office has found that the undertaking will have adverse impacts on historic resources within the project’s area of potential impact.

Our office believes that large alternative energy projects such the Mohawk Solar project offer few viable options that might avoid or minimize visual impacts associated with their scale and industrial character.

As such, we recommend that the involved parties proceed with the development of an appropriate historic preservation mitigation plan. The plan should establish specific preservation/history projects 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 would then be memorialized in a Letter of Resolution as required by Section 14.09.

At this point in time this office has no further comments on the submitted report. If you or your client should have any questions, please contact me john.bonafide@parks.ny.gov or (518) 268-2166.

Sincerely,



John A. Bonafide
Director,
Technical Preservation Services Bureau
Agency Historic Preservation Officer

cc: Andrew Davis, PSC (via CRIS email)
Charles Vandrei, DEC (via CRIS email)
CRIS Notification List

att: Historic Properties List

Attachment A - Historic Properties List

USN	Property Name	Location	MCD	NR Status	Historic District
05702.000011	560 Clinton Rd	560 Clinton Road	Canajoharie	Not Eligible	
05702.000013	181 McEwan Rd	181 McEwan Road	Canajoharie	Not Eligible	
05702.000018	520 Clinton Rd	520 Clinton Road	Canajoharie	Not Eligible	
05702.000021	486 Clinton Rd	486 Clinton Road	Canajoharie	Not Eligible	
05702.000027	616 Clinton Road	616 Clinton Road	Canajoharie	Not Eligible	
05702.000029	PRODUCTION CREDIT FARM	918 Clinton Road	Canajoharie	Not Eligible	
05702.000052	Mapletown Cemetery	Mapletown Road & Blaine Road	Canajoharie	Eligible	
05702.000073	424 Clinton Road	424 Clinton Road	Canajoharie	Not Eligible	
05702.000145	852 Clinton Rd	852 Clinton Road	Canajoharie	Not Eligible	
05702.000151	Yerding Cemetery	139 Clinton Road	Canajoharie	Undetermined	
05702.000152	122 G. Bowerman Rd	122 G. Bowerman Rd	Canajoharie	Eligible	
05702.000153	Marshville Evangelical Church	6806 Ames Road	Canajoharie	Not Eligible	
05702.000154	462 Dygert Rd.	462 Dygert Road	Canajoharie	Eligible	
05702.000155	2055 Sprout Brook Road	2055 Sprout Brook Road	Canajoharie	Eligible	
05702.000156	Old Baptist Church Cemetery	Old Sharon Rd	Canajoharie	Eligible	Bowman's Creek HD
05706.000110	WINDFALL DUTCH BARN	2009 Clinton Road	Minden	Listed	
05706.000153	1059 State Highway 80	1059 State Highway 80	Minden	Listed	
05706.000159	Freysbush United Methodist Church and Cemetery	620 Freysbush Road	Minden	Eligible	
05706.000160	Dunkel Cemetery	152 Marshville Road	Canajoharie	Not Eligible	
05708.000003	Brower House	844 Hickory Hill Road	Palatine	Eligible	Stone Arabia Patent HD
05708.000005	FORT WAGNER	6710 NY 5	Palatine	Eligible	
05708.000007	REFORMED DUTCH CHURCH OF STONE ARABIA	5414 State Highway 10	Palatine	Listed	Stone Arabia Patent HD
05708.000008	TRINITY LUTHERAN CHURCH	5426-5430 State Highway 10	Palatine	Listed	Stone Arabia Patent HD
05708.000091	MONTGOMERY COUNTY FARM	4934 NY 5	Palatine	Listed	
05708.000135	643 New Turnpike Road	643 New Turnpike Road	Palatine	Eligible	
05708.000152	172 Kilts Road	172 Kilts Road	Palatine	Listed	Stone Arabia Patent HD
05708.000218	PALATINE CHURCH	Old Mill Road	Palatine	Listed	
05708.000233	Van Wie Farmstead	269 Brower Rd	Palatine	Listed	
05708.000236	110 West Skyline Drive	110 West Skyline Drive	Palatine	Not Eligible	
05708.000237	105 Trailer Street	105 Trailer St	Palatine Bridge	Not Eligible	
05708.000238	107 Trailer Street	107 Trailer Street	Palatine	Not Eligible	
05708.000239	109 Trailer Street	109 Trailer Street	Palatine	Not Eligible	
05708.000240	113 Trailer Street	113 Trailer St	Palatine Bridge	Not Eligible	
05708.000241	127 Trailer St	127 Trailer Street	Palatine Bridge	Not Eligible	
05708.000244	Sitterly Cemetery	Hickory Hill Road	Fort Plain	Eligible	Stone Arabia Patent HD
05708.000245	5474 Ephratah Road	5474 Ephratah Road	Fort Plain	Eligible	Stone Arabia Patent HD
05708.000246	351 Groff Road, Palatine	351 Groff Road	Palatine	Eligible	Stone Arabia Patent HD
05708.000247	5650 Ephratah Road	5650 Ephratah Road	Canajoharie	Eligible	Stone Arabia Patent HD
05708.000248	HOP HOUSE	State Route 10 & Dillenbeck Rd	Palatine	Eligible	Stone Arabia Patent HD
05708.000249	265 Dillenback Road	265 Dillenback Road	Palatine	Eligible	Stone Arabia Patent HD
05708.000250	3651 McKinley Road	3651 McKinley Road	Palatine	Eligible	
05709.000152	Rappa Road Cemetery	Rappa Road	Canajoharie	Eligible	
05710.000001	FORT KLOCK	7214 NY 5	St. Johnsville	Listed	
05710.000003	6968 State Highway 5	6968 State Highway 5	St. Johnsville	Eligible	
05741.000015	WEST HILL ELEMENTARY SCHOOL	3 Otsego St	Canajoharie	Listed	Canajoharie HD
05741.000016	Bragdon-Lipe House	17 Otsego Street	Canajoharie	Listed	Canajoharie HD
05741.000080	US POST OFFICE	50 West Main Street	Canajoharie	Listed	Canajoharie HD
05741.000470	Van Alstyne House	42 Moyer Street	Canajoharie	Listed	Canajoharie HD
05741.000693	Canajoharie Historic District		Canajoharie	Listed	
05742.000139	US POST OFFICE	41 River Street	Fort Plain	Listed	Fort Plain HD
05742.000878	Fort Plain Historic District		Fort Plain	Listed	
05742.000883	SR 80 Bridge, Fort Plain-Nelliston-Bridge - BIN-4030970	River St	Fort Plain	Listed	NYS Barge Canal NHL
05743.000011	AMES VILLAGE HALL	611 Latimer Hill Road	Canajoharie	Listed	Bowman's Creek HD
05748.000042	Waterman-Gramps House	SCHOOL STSchool St	Nelliston	Listed	
05748.000047	NELLISTON SCHOOL	10 Stone Arabia Street	Palatine	Listed	
05748.000062	Lasher Davis House	13 West Main St	Nelliston	Listed	
05748.000097	NELLIS FARM	56 Nellis Street	Nelliston	Listed	
05748.000131	PETER EHLE HOUSE	6176 East Main St	Nelliston	Listed	
05748.000133	WALRATH VAN HORNE HOUSE	6483 West Main Street	Palatine	Listed	
05748.000141	Nelliston Historic District		Nelliston	Listed	
05749.000042	FREY HOUSE	Frey Ln	Palatine Bridge	Listed	Palatine Bridge HD

07703.000132	The Tepee	7632 US 20	Cherry Valley	Listed	
07703.000133	Lindesay Patent Rural Historic District		Multiple	Listed	
07703.000138	433 Salt Springville Road	433 Salt Springville Road	Cherry Valley	Eligible	
07721.000649	Springfield Patent Historic District (formerly Waggoner Patent HD)		Multiple	Eligible	
09514.000025	407 Kilts Rd	407 Kilts Rd	Sharon	Listed	
09514.000029	254 Buel Road	254 Buel Road	Sharon	Eligible	
09514.000030	130 Zeller Road	130 Zeller Road	Sharon	Eligible	
09514.000031	375 Kilts Road	375 Kilts Road	Sharon	Eligible	
09545.000005	THE AMERICAN HOTEL	192 Main Street	Sharon	Listed	Sharon Springs HD
09545.000136	Sharon Springs Historic District			Listed	