

# Hoffman Falls Wind Project

Matter No. 23-02976

REDACTED

## Appendix K

### Cultural Resources Avoidance, Minimization, and Mitigation Plan – Revision 1

Revision	Date	Pages Affected
0	02/06/2026	2-4, Attachments B, C, D
1	04/16/2026	4-5, Attachments B, C, D



90 State Street  
Albany, New York 12207

April 2026

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## LIST OF ATTACHMENTS

- Attachment A. NYSHPO Correspondence
- Attachment B. Archaeological Avoidance Plan
- Attachment C. Unanticipated Discovery Protocol
- Attachment D. Cultural Resources Mitigation and Offset Plan

## GLOSSARY TERMS

<b>Permittee</b>	Hoffman Falls Wind LLC (the Permittee) a wholly owned subsidiary of Liberty Renewables Inc. (Liberty), the entity seeking a Siting Permit for Hoffman Falls Wind (the Facility) from the Office of Renewable Energy Siting and Electric Transmission (ORES) under Article VIII of the New York State Public Service Law.
<b>Facility</b>	Refers to the proposed 109.8-megawatt utility-scale wind energy generating project. Associated support facilities will include 18 wind turbines, an underground medium voltage collection system, gravel access roads, a permanent meteorological (MET) tower, an aircraft detection lighting system (ADLS) tower, temporary construction laydown areas, a temporary concrete batch plant, an operations and maintenance (O&M) facility, a medium voltage-to-transmission voltage collection substation, a point of interconnection (POI) switchyard, and a short 115kV overhead transmission line that will connect the Facility to the high voltage electrical grid.
<b>Facility Site</b>	A boundary area encompassing all parcels that are proposed to host facility components.
<b>Project</b>	The development, construction, operation, and maintenance of the Hoffman Falls Wind Facility.

## 1.0 INTRODUCTION

On behalf of Hoffman Falls Wind LLC (the Permittee), a subsidiary of Liberty Renewables Inc. (Liberty), Environmental Design and Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) is providing this Cultural Resources Avoidance, Minimization and Mitigation Plan (CRAMMP) for the Hoffman Falls Wind Project (Facility), in the Towns of Fenner, Nelson, Smithfield, and Eaton in Madison County, New York, in support of the Permittee's Compliance Filings. The information and recommendations included in this CRAMMP are intended to assist the Office of Renewable Energy Siting and Electric Transmission (ORES) and other New York State agencies in their review of the proposed Facility under Article VIII of the New York State Executive Law.

As described in 16 NYCRR Section 1100-10.2 (Pre-Construction Compliance Filings), a CRAMMP is required prior to construction of any project permitted under Article VIII:

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

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

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

This CRAMMP memorializes consultation undertaken by the Permittee regarding the Facility's potential effect on cultural resources. The Permittee received their Siting Permit for a Major Renewable Energy Facility on December 22, 2025.

Cultural resources surveys were conducted in support of the Facility between 2021 and 2025. These surveys have previously been submitted in support of the Permittee's Article VIII Application for the Facility and are available for review on the New York State Historic Preservation Office (NYSHPO) Cultural Resource Information System (CRIS) website. Concurrent with the preparation of these surveys and analyses, the Permittee has engaged in ongoing consultation with the NYSHPO, ORES, Oneida Indian Nation, and Tuscarora Nation to evaluate the Project's potential effect on cultural resources.

## 2.0 ARCHAEOLOGICAL SURVEY

EDR prepared a *Phase IA Archaeological Survey* report on May 5, 2023, to assess the archaeological sensitivity of the Facility Site and record any previously identified archaeological resources within and near the Archaeological Area of Potential Effect (APE) (EDR, 2023a). **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** had been recorded within 1 mile of the Facility Site and one NYSM site overlapped the Facility Site. Therefore, the Facility Site was determined to have elevated archaeological sensitivity.

This survey consisted of 2,415 shovel tests and approximately 43 acres of pedestrian survey, some of which falls outside of the final limits of disturbance (LOD). A total of **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**. All **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** were unevaluated for the S/NRHP and Phase II archaeological site examinations were recommended if they could not be avoided by significant ground disturbance.

The results of this survey were submitted to NYSHPO in the *Phase IB Archaeological Survey* via CRIS on December 13, 2023, and an addendum memo was submitted on December 22, 2023 (EDR, 2023b, 2023c). An *Archaeological Site Avoidance Plan* was submitted to NYSHPO via CRIS on January 26, 2024 (EDR, 2024a). NYSHPO responded in a letter dated February 9, 2024, concurring with the Phase IB survey and addendum memo and requesting revisions to the site avoidance plan (NYSHPO, 2024a). EDR submitted a revised *Archaeological Site Avoidance Plan* on February 12, 2024 (EDR, 2024b), and NYSHPO accepted the revisions on March 6, 2024 (NYSHPO, 2024b).

As part of the Permittee's application for a Siting Permit from ORES, EDR submitted Exhibit 8 (Visual Impacts) and Exhibit 9 (Cultural Resources) to NYSHPO on June 6, 2024, (EDR, 2024c, 2024d). NYSHPO concurred and accepted Exhibit 8 and Exhibit 9 in a letter dated June 28, 2024 (NYSHPO, 2024c).

On September 18, 2024, EDR submitted a *Phase IB Archaeological Report Addendum Memo* to NYSHPO (EDR, 2024) and on October 10, 2024, NYSHPO concurred and accepted the findings of the addendum (NYSHPO, 2024d). After 25 acres were added to the APE, EDR submitted an *Additional Phase IB Archaeological Survey and Phase II Site Examination Memo* to NYSHPO on August 12, 2025 (EDR, 2025a). NYSHPO concurred with the addendum and requested a Phase II Site Examination on August 14, 2025 (NYSHPO, 2025a). On August 15, 2025, EDR submitted the *Phase II Site Examination Workplan* (EDR, 2025b), and on September 3, 2025, NYSHPO concurred and approved the work plan (NYSHPO, 2025b).

EDR conducted a Phase II investigation in September 2025 within the boundary of **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END**

**CONFIDENTIAL INFORMATION**, where grubbing and/or grading could not be avoided. The Phase II site examination consisted of 40 close interval shovel test pits and two test units. The site was recommended as not eligible for the S/NRHP. The results of the Phase II examinations were submitted to NYSHPO in the *Phase II Archaeological Site Examination Report* via CRIS on November 25, 2025 (EDR, 2025c). On December 9, 2025, NYSHPO concurred with the recommendation that **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** is not eligible for listing on the S/NRHP and stated that no further archaeological work was recommended (NYSHPO, 2025b).

On December 30, 2025, EDR submitted a *Phase IB Archaeological Report Addendum Memo* to NYSHPO (EDR, 2025d) and on January 6, 2026, NYSHPO concurred and accepted the findings of the addendum (NYSHPO, 2026).

A revised *Archaeological Avoidance Plan* is included as part of this CRAMMP (Attachment B) that incorporates the results of the *Phase II Archaeological Investigation*. A revised Unanticipated Discovery Plan (UDP) is included as part of this CRAMMP (Attachment C) that contains an updated contact list and adopts the most recent human remains discovery protocol published by NYSHPO in January 2025, as well as the Advisory Council on Historic Preservation's (ACHP) *Policy Statement on Burial Sites, Human Remains, and Funerary Objects* (ACHP, 2023; NYSHPO, 2025a).

### 3.0 ABOVEGROUND HISTORIC RESOURCES

A *Historic Resources Survey Report* which evaluated the Facility's potential effect on aboveground historic resources listed or eligible for listing in the S/NRHP was submitted to NYSHPO on January 3, 2024 (EDR, 2024f). This document included the results of the historic resources survey fieldwork, conducted on November 15 through November 21, 2023, which assessed **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED]

> **END CONFIDENTIAL INFORMATION**, EDR submitted a *Visual Impact Assessment (VIA)* to NYSHPO which included analysis of potential visual impacts to historic resources (EDR, 2024g). For the *VIA*, photo simulations of the proposed Project (including the wind turbines, towers, access roads, operations and maintenance facility, collection substation, and switchyard) were prepared from

representative viewpoints. In review correspondence issued on March 15, 2024, NYSHPO determined that **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** historic resources eligible or listed in the S/NRHP would have the potential to be impacted by the Project (NYSHPO, 2024f).

#### 4.0 CULTURAL RESOURCES MITIGATION AND OFFSET PLAN

The NYSHPO concluded that the Facility will have an adverse impact on historic resources. In correspondence dated March 15, 2024, the NYSHPO requested the preparation of an historic preservation mitigation plan including outreach to history-based organizations within the impacted communities (NYSHPO, 2024e).

On January 29, 2026, EDR provided a *Cultural Resources Mitigation and Offset Plan* (Attachment D; EDR, 2026b) to NYSHPO which summarized the outreach efforts to stakeholders as well as efforts to identify appropriate mitigation projects. As part of the plan, the Permittee proposed offset funding in the amount of \$119,500 to fund 12 mitigation projects.

The *Cultural Resources Mitigation and Offset Plan* describes stakeholder outreach and identification of potential mitigation projects to offset potential visual impacts to historic resources and the historic setting as required by 16 NYCRR Section 1100-10.2(g)(2) as well as by the NYSHPO as part of their review of the Facility under Section 14.09 of the New York State Historic Preservation Act.

The mitigation projects identified in the *Cultural Resources Mitigation and Offset Plan* will be implemented in accordance with the following stipulations to avoid, minimize, and mitigate the effects of the Facility on historic architectural resources:

1. The Permittee shall carry out the mitigation measures outlined in the *Cultural Resources Mitigation and Offset Plan* and response memorandum to offset the potential effects of the Facility on historic resources as required by the Siting Permit.
2. The Permittee agrees to continue to consult with the Stakeholders to ensure they spend the above-referenced mitigation funding in compliance with the *Cultural Resources Mitigation and Offset Plan* and the stipulations identified in this CRAMMP.
3. If the funding provided by the Permittee does not cover the cost of the mitigation projects identified in the *Cultural Resources Mitigation and Offset Plan* and the response memorandum, the Permittee shall not have an obligation to provide any additional funding and the costs for these projects and activities will be the responsibility of the Stakeholders.

4. Reporting: The Permittee shall provide ORES and the NYSHPO with regular updates regarding ongoing consultation as required by Stipulation 2. The Permittee shall also provide evidence of payment of the above-referenced grants to the Stakeholders.
5. Duration: The terms outlined in the *Cultural Resources Mitigation and Offset Plan* shall be carried out within two years from the start of construction of the Facility.
6. Amendments: The mitigation projects outlined in the *Cultural Resources Mitigation and Offset Plan* and the response memorandum may only be amended when such an amendment is agreed to in writing by the Permittee, NYSHPO, and ORES. The amendment will be effective on the date a copy signed by all parties is filed with the NYSHPO and ORES. Amendments to the approved CRAMMP will be subject to review and approval pursuant to 16 NYCRR Part 1100-11.1

## 5.0 SUMMARY AND CONCLUSIONS

EDR has provided the NYSHPO correspondence (Attachment A), an *Archaeological Avoidance Plan* (Attachment B), an *Unanticipated Discovery Plan* (Attachment C), and a *Cultural Resources Mitigation and Offset Plan* (Attachment D) to demonstrate that the Permittee has met the requirements of 16 NYCRR Section 1100-10.2(g).

## 6.0 REFERENCES

Advisory Council on Historic Preservation (ACHP). 2023. Policy Statement on Burial Sites, Human Remains, and Funerary Objects. ACHP, Washington, DC.

Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR). 2023a. Phase IA Archaeological Survey, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. January 2023.

EDR. 2023b. Phase IB Archaeological Survey, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. December 2023.

EDR. 2023c. Phase IB Archaeological Survey Addendum Memo, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. December 2023.

EDR. 2024a. Re: Hoffman Falls Wind Project, Archaeological Site Avoidance Plan. Correspondence from EDR to NYSHPO. Via CRIS, January 26, 2024.

EDR. 2024b. Re: Hoffman Falls Wind Project, Revised Archaeological Site Avoidance Plan. Correspondence from EDR to NYSHPO. Via CRIS, February 12, 2024.

EDR. 2024c. *Hoffman Falls Wind Project, Case No. 23-02976, 1100-2.9, Exhibit 8, Visual Impacts, Revised*. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. June 2024.

EDR. 2024d. *Hoffman Falls Wind Project, Permit Application No. 23-00038, 1100-2.10 Exhibit 9, Cultural Resources, Revised*. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. June 2024.

EDR. 2024e. Phase IB Archaeological Survey Addendum Memo, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison 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. 2024f. Historic Resources Survey Report, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. January 2024.

EDR. 2024g. *Visual Impact Assessment, Hoffman Falls Wind, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. February 15, 2024.

EDR. 2025a. Additional Phase IB Archaeological Survey and Phase II Archaeological Site Examination, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. August 2025.

EDR. 2025b. Phase II Archaeological Site Examination, USN 05312.000038, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. August 2025.

EDR. 2025c. Phase II Archaeological Site Examination Work Plan, USN 05312.000038, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. November 2025.

EDR. 2025d. Phase IB Archaeological Survey Addendum Memo, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. December 2025.

EDR. 2026a. *Archaeological Avoidance Plan, Hoffman Falls Wind Project, Towns of Fenner, Nelson, Smithfield, and Eaton, Madison County, New York.* Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. January 2026.

EDR. 2026b. *Cultural Resources Mitigation and Offset Plan, Hoffman Falls Wind Project, Towns of Fenner, Nelson, Smithfield, and Eaton, Madison County, New York.* Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. January 2026.

NYSHPO. 2024a. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Bradley Russell (NYSHPO) to EDR. NYSOPRHP, Waterford, NY. Via CRIS, February 9, 2024.

NYSHPO. 2024b. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Bradley Russell (NYSHPO) to EDR. NYSOPRHP, Waterford, NY. Via CRIS, March 6, 2024.

NYSHPO. 2024c. RE: 21PR03978 - Hoffman Falls Wind Project. Correspondence from Robyn Sedgwick (NYSHPO) to Kristen Olson (EDR). NYSOPRHP, Waterford, NY. Via email, March 21, 2024.

NYSHPO. 2024d. RE: 21PR03978 - Hoffman Falls Wind Project. Correspondence from Bradley Russell (NYSHPO) to Kristen Olson (EDR). NYSOPRHP, Waterford, NY. Via email, October 10, 2024.

NYSHPO. 2024e. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSOPRHP, Waterford, NY. Via CRIS, February 8, 2024.

NYSHPO. 2024f. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSOPRHP, Waterford, NY. Via CRIS, March 15, 2024.

NYSHPO. 2025a. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Bradley Russell (NYSHPO) to Kristen Olson (EDR). NYSOPRHP, Waterford, NY. Via email, August 14, 2025.

NYSHPO. 2025b. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Bradley Russell (NYSHPO) to Kristen Olson (EDR). NYSOPRHP, Waterford, NY. Via email, December 9, 2025.

NYSHPO. 2026. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Bradley Russell (NYSHPO) to Kristen Olson (EDR). NYSOPRHP, Waterford, NY. Via email, January 6, 2026.

New York State Historic Preservation Office (NYSHPO). 2024a. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSOPRHP, Waterford, NY. Via CRIS, February 8, 2024.

NYSHPO. 2024b. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSOPRHP, Waterford, NY. Via CRIS, March 15, 2024

**Attachment A**  
NYSHPO Correspondence



June 15, 2021

[REDACTED]  
Historic Resources Specialist  
Oneida Indian Nation  
2037 Dream Catcher Plaza  
Oneida, NY 13421-0662  
Email: [REDACTED]

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

Dear [REDACTED]:

Liberty Renewables Inc. is currently planning, designing, and conducting environmental permitting studies for the proposed Hoffman Falls Wind Project and would like to invite the Oneida 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 Fenner, Smithfield, and Nelson in Madison County (see Figure 1 attached). We are aware that the Facility is located within ancestral Oneida 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 8,400-acre area (referred to herein as the Facility Area; see Figure 2 attached), which consists primarily of active agricultural land and forest and is

[REDACTED]  
[REDACTED]. [REDACTED]  
[REDACTED]  
[REDACTED]

At this time, we anticipate that the Facility will consist of 15 to 20 wind turbines, with a total generating capacity of up to 72 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<sup>1</sup>. This provides flexibility during Facility development to minimize

<sup>1</sup> [REDACTED]  
[REDACTED]

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 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:

[REDACTED]

[REDACTED]

Liberty Renewables Inc.  
90 State Street, Suite 700  
Albany, NY 12207

Email: [REDACTED]

Phone: [REDACTED]

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 (summer 2021)
- Phase IB Archaeological Fieldwork (anticipated to be conducted fall 2021)
- Historic Resources Survey Fieldwork (fall 2021)
- Historic Resources Survey Report (winter 2021)

- Phase IB Archaeological Survey Report (winter 2021)
- Siting Permit Application submitted to ORES (2022)
- U.S. Army Corps of Engineers wetland permit review/Section 106 review (2022)

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

Sincerely,



Environmental Design & Research

Attachments:

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

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

**Review Responses**

[Redacted]	Review Type	Response
[Redacted]	Archaeology	[Redacted] DPRHP concurs with EDR's proposed archaeological investigation (see the attached letter). Please review the specific information request(s) below and click the Process button to respond to each request.
[Redacted]	Survey and Evaluation	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	Review Type	Request Type	Request Entity	Request Item	Request Description
Processed	[Redacted]	Archaeology	Request a New Attachment, Photo, or Survey for this Consultation Project		Archaeology Survey	Please submit the results of the Phase IA archaeological investigation
Processed	[Redacted]	Archaeology	Request a New Attachment, Photo, or Survey for this Consultation Project		Attachment	Please submit a shapefile showing the project components
Processed	[Redacted]	Survey and Evaluation	Request a New Trekker Survey			Please submit a Trekker survey of above-ground historic resources based on GIS modeling within five-miles of 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. 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 also be sent at this time to be fulfilled once field work has been completed. Please supply the standard survey report consisting of an overview, context and an assessment of any resources that may be eligible. Contact [Redacted]

## View and/or Address a Response

REDACTED – Matter No. 23-02976




### Project 21PR03989: Blue Hill Wind Project (J8PFM57KW9GF)

[View Project](#)

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

#### Review Responses

Reviewer	Review Type	Response
[REDACTED]	Archaeology	[REDACTED] DPRHP concurs with EDR's proposed Phase IA archaeological investigation (see attached letter). Please review the specific information request(s) below and click the Process button to respond to each request.
[REDACTED]	Survey and Evaluation	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.

Process	Status	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	[REDACTED]	Archaeology	Request a New Attachment, Photo, or Survey for this Consultation Project		Archaeology Survey Please submit the results of the Phase IA archaeological investigation
	Information Requested	[REDACTED]	Archaeology	Request a New Attachment, Photo, or Survey for this Consultation Project		Attachment Please submit a shapefile showing project components
	Information Requested	[REDACTED]	Survey and Evaluation	Request a New Trekker Survey		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

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 also be sent at this time to be fulfilled once field work has been completed. Please supply the standard survey report consisting of an overview, context and an assessment of any resources that may be eligible. Contact [REDACTED] with any questions. Thank you.

**From:**  
**To:**  
**Cc:**



**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects  
**Date:** Wednesday, September 1, 2021 9:34:22 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.jpg](#)

[EXTERNAL SENDER]



Tuesday, September 7, from 11-12 would work for me.

Best Regards,



**ONEIDA INDIAN NATION**



2037 Dream Catcher Plaza  
Oneida, NY 13421



**From:** [Redacted]  
**Sent:** Wednesday, September 01, 2021 9:33 AM  
**To:** [Redacted]

**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects

Hi [Redacted],

The following times work best for EDR and Liberty Renewables:

**Tues. 9/7**  
11:00-12:00  
2:00-3:00

**Weds. 9/8**  
2:00-3:00

Please let me know what works for you and I will send a calendar invite around. Thank you,



[REDACTED]

**From:** [REDACTED]

**Sent:** Monday, August 30, 2021 9:15 AM

**To:** [REDACTED]

[REDACTED]

**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects

[EXTERNAL SENDER]

[REDACTED]

I can be available Tuesday or Wednesday of next week.

Best Regards,

[REDACTED]

**ONEIDA INDIAN NATION**

[REDACTED]  
2037 Dream Catcher Plaza  
Oneida, NY 13421



**From:** [REDACTED]

**Sent:** Friday, August 27, 2021 5:15 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects

Hi [REDACTED]

I am following up on your request for a meeting regarding these projects and would like to set something up either next week or the week after depending on your availability. Please let me know if any of the dates below work for you, and any specific times, and we can attempt to set up something that works for you, EDR and Liberty Renewables:

Wednesday 9/1

Friday 9/3  
Tuesday 9/7  
Wednesday 9/8

Thank you and have a great weekend,

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Saturday, August 14, 2021 10:52 AM

**To:** [REDACTED]

[REDACTED]

**Subject:** Re: Blue Hill and Hoffman Falls Wind Projects

[EXTERNAL SENDER]

[REDACTED]

Thank you for the update and don't worry about the delay, it is a very busy time of year for everyone.

Best Regards,

[REDACTED]

**ONEIDA INDIAN NATION**

[REDACTED]

2037 Dream Catcher Plaza  
Oneida, NY 13421



---

**From:** [REDACTED]

**Sent:** Thursday, August 12, 2021 6:13:21 PM

**To:** [REDACTED]

[REDACTED]

[REDACTED]

**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects

Hi [REDACTED]

Apologies for the delay in getting back to you. The Project Area represented in the figures provided to the Oneida Nation is general in nature and represents areas being potentially evaluated as part of due diligence for the Project, and does not represent the lands where Project infrastructure will ultimately be located. No project components or infrastructure will be located on Oneida Nation lands. EDR and Liberty Renewables will provide the Oneida Nation with updated maps indicating the proposed locations of Project infrastructure as soon as they are available.

Please let us know if you have any additional questions. Thank you,

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Wednesday, July 21, 2021 3:21 PM

**To:** [REDACTED]

[REDACTED]

**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects

[EXTERNAL SENDER]

[REDACTED]

I had a quick question regarding the mapping for the Hoffman Falls Wind Project. [REDACTED]

[REDACTED]

[REDACTED] s there a way that the Nation lands can be removed from the Facility Area and the Nation can be provided new maps with the change? If not, can you send an explanation to why it needs to be left within the Facility Area?

Please feel free to call or email if you want to discuss this more or you have questions.

Best Regards,

[REDACTED]

**ONEIDA INDIAN NATION**

[REDACTED]  
2037 Dream Catcher Plaza  
Oneida, NY 13421



---

**From:** [REDACTED]  
**Sent:** Wednesday, July 21, 2021 9:11 AM  
**To:** [REDACTED]  
**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects

[REDACTED]

Thank you for the information. I realized after sending the email and rereading the letter, that it was in the timeline.

I should be back in touch soon regarding these projects.

Best Regards,

[REDACTED]

**ONEIDA INDIAN NATION**

[REDACTED]  
2037 Dream Catcher Plaza  
Oneida, NY 13421



---

**From:** [REDACTED]  
**Sent:** Tuesday, July 20, 2021 5:23 PM  
**To:** [REDACTED]  
**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects

Hi [REDACTED]

My apologies for the belated response on our end. Depending on final project design, it is assumed a USACE Nationwide Permit may be needed to address wetland impacts, which will be filed for in parallel with the Section 94-c siting permit in 2022.

Please let us know if you have any further questions or want to discuss further. Thank you,

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]

**Sent:** Friday, July 9, 2021 1:29 PM

**To:** [REDACTED]

[REDACTED]

**Subject:** RE: Blue Hill and Hoffman Falls Wind Projects

[EXTERNAL SENDER]

[REDACTED]

I am a little late getting back to you but I wanted to see if there were any federal permits or assistance anticipated for these projects.

Please let me know if there are any questions.

Best Regards,

[REDACTED]

**ONEIDA INDIAN NATION**

[REDACTED]  
2037 Dream Catcher Plaza  
Oneida, NY 13421



---

**From:** [REDACTED]

**Sent:** Tuesday, June 15, 2021 6:08 PM

**To:** [REDACTED]

[REDACTED]

**Subject:** Blue Hill and Hoffman Falls Wind Projects

Dear [REDACTED],

Attached to this email are letters and mapping sent on behalf of [REDACTED] of Liberty Renewables, who are planning to develop two wind projects (the Blue Hill Wind Project and Hoffman Falls Wind Project) on lands near the Oneida Nation. We are aware that the project is located within ancestral Oneida territory and would

like to initiate a dialog with the Oneida Nation regarding potential archaeological sites, historic properties, or other sensitive areas of concern. We hope to set up a meeting or call to discuss the project with you and the Nation in the near future.

Thank you,

[REDACTED]

[REDACTED]

217 Montgomery Street, Suite 1100, Syracuse, New York 13202

[REDACTED]

EDR a **better** environment

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

### Review Responses

	Review Type	Response
[REDACTED]	Archaeology	We have reviewed the Phase IA archaeological report and are recommending report revisions. See the attached letter for details. Please review the specific information request(s) below and click the Process button to respond to each request.

### Information Requests


Process	Status	[REDACTED]	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	[REDACTED]	Archaeology	Request a New Attachment for an Existing Survey	Phase IA Archaeological Survey, Blue Hill Wind Project, Town of Eaton, Madison County, New York (21SR00524)	Attachment	Please submit the revised Phase IA archaeological report

## Review Responses


REDACTED – Matter No. 23-02976

Reviewer	Review Type	Response
[REDACTED]	Archaeology	We have reviewed the revised Phase IA archaeological report and we concur with the proposed Phase IB archaeological survey (see attached letter). Please review the specific information request(s) below and click the Process button to respond to each request.

## Information Requests

Process	Status	[REDACTED]	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	[REDACTED]	Archaeology	Request a New Attachment, Photo, or Survey for this Consultation Project		Archaeology Survey	Please submit the results of the Phase IB archaeological survey

## Attachments

Attachment	[REDACTED]	Review Type	Type	Name	Description
	[REDACTED]	Archaeology	Document	Response to Submission 3	Response to revised Phase IA report



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

February 15, 2023

[REDACTED]  
[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]:

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 (6NYCRR Part 617).

OPRHP has reviewed the Phase IA Archaeological Survey report for the Hoffman Falls Wind Project prepared by Environmental Design & Research, D.P.C, Consulting Archaeologists (January 2023; 23SR00080). OPRHP concurs with the report recommendation that a Phase IB Archaeological Survey is warranted, and we support the Phase IB testing strategy outlined in the report.

If you have any questions, I can be reached [REDACTED]

Sincerely,  
[REDACTED]

Historic Preservation Specialist - Archaeology



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

May 16, 2023

[REDACTED]  
[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]:

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 (6NYCRR Part 617).

OPRHP has reviewed the revised Phase IA Archaeological Survey report for the Hoffman Falls Wind Project prepared by Environmental Design & Research, D.P.C., Consulting Archaeologist (May 2023; 23SR00256). OPRHP concurs with the report recommendation that a Phase IB Archaeological Survey is warranted, and we support the Phase IB testing strategy outlined in the report.

If you have any questions, I can be [REDACTED]

Sincerely,

[REDACTED]

Historic Preservation Specialist - Archaeology

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

### Review Responses

Reviewer	Review Type	Response
[REDACTED]	Survey and Evaluation	SHHPO approves the methodology proposed for this project and a Trekker survey has been initiated.

### Information Requests

Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
No Request Records							

### Attachments

Attachment	Reviewer	Review Type	Type	Name	Description
No Attachment Records					

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Hoffman Falls Wind Project (21PR03978) - Phase IA and IB Reports for Your Review - Part 1  
**Date:** Wednesday, January 10, 2024 12:00:15 PM  
**Attachments:** [image001.png](#)  
[2023-12-13T13-06-442023-12-13\\_Hoffman\\_Falls\\_Wind\\_Phase\\_IB\\_Archaeology\\_Survey\\_Report\\_Compresed\\_Part2.pdf](#)

Some people who received this message don't often get email from bradley.russell@parks.ny.gov. [Learn why this is important](#)

**[EXTERNAL SENDER]**

Phase IB (2 of 3)

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**From:** [REDACTED]  
**Sent:** Wednesday, January 10, 2024 11:56 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Hoffman Falls Wind Project (21PR03978) - Phase IA and IB Reports for Your Review - Part 1

Good Morning [REDACTED]

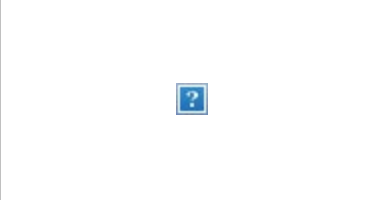
Please find attached the Phase IA archaeological survey report for the above project for your review and comment. The Phase IB report and an addendum will follow in sections. I have split it up to allow me to email it.

Please provide comments directly to [REDACTED] and copy me so I can file your response in CRIS.

Thank you,  
[REDACTED]

[REDACTED]  
Historic Preservation Specialist - Archaeology  
Division for Historic Preservation

**New York State Parks, Recreation & Historic Preservation**  
Peebles Island State Park, P.O. Box 189, Waterford, New York 12188-0189  
[REDACTED]  
<https://parks.ny.gov/shpo>





**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

February 8, 2024

[REDACTED]  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County  
21PR03978

Dear [REDACTED]

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

We note that there are 142 listed and/or eligible historic resources within the five-mile zone of visual impact. Please see Appendix A for a complete list of historic resources. We have reviewed the submission received on January 26, 2024, including the Historic Resources Survey Report dated January 2024 and the list of visually sensitive resources. Based on that review, we offer the following comments and request some additional information:

- We note that the list of visually sensitive resources in Appendix C appears to be missing 121 eligible resources. Please update Appendix C and the Historic Resources Survey Results Map to reflect all historic resources within the zone of visual impact.
- It appears that the project has the potential to impact the State/National Register Listed [REDACTED] and the State/National Register eligible [REDACTED]. We request visual simulations from these resources looking towards the wind turbines to determine if, and to what extent, they will have views.

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

Sincerely,

[REDACTED]

cc: [REDACTED] – ORES

Appendix A

USN	Name	Status	Historic District
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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



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





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



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

February 9, 2024

[REDACTED]  
[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]:

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.

OPRHP has reviewed the Phase IB Archaeological Survey Report (December 2023; 23SR00648) and the related Addendum Phase IB Survey Memo dated December 22, 2023 for the Hoffman Falls Wind Project (21PR03978) prepared by the Environmental Design & Research, D.P.C. (EDR), Consulting Archaeologists. The survey resulted in the identification of

[REDACTED]:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

OPRHP concurs with the report recommendation that [REDACTED] be avoided. If avoidance is not feasible, a Phase II archaeological investigation is recommended to determine National Register Eligibility and establish site boundaries.

OPRHP has also reviewed the Archaeological Site Avoidance Plan for the same project, dated January 26, 2024. We are requesting the plan be revised. The revised plan should provide a more thorough and detailed explanation of the avoidance procedures. It should include discussion of additional measures such as erecting fencing around the site buffers that is clearly marked as an environmentally sensitive area and marking all site plans with the appropriate 50-foot buffers indicating their environmental sensitivity. These types of measures are critical to assure the no inadvertent site disturbance will take place during grading, construction, etc. Additionally, OPRHP does not support grading within the 50-foot buffer established around site [REDACTED]. If disturbance within the 50-foot site buffer cannot be avoided, OPRHP recommends that a Phase II investigation of the site take place to make recommendations concerning its Eligibility for inclusion on the State and National Registers of Historic Places.

If you have any questions, I can be reached at [REDACTED]

Sincerely,

[REDACTED]  
Historic Preservation Specialist - Archaeology



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**RANDY SIMONS**  
Commissioner *Pro Tempore*

March 6, 2024

[REDACTED]  
[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]:

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.

OPRHP has reviewed the Revised Site Avoidance Plan for the Hoffman Falls Wind project (21PR03978) prepared by Environmental Design & Research, Landscape Architecture, Engineering, and Environmental Services, D.P.C. (EDR), Consulting Archaeologists (February 2024). OPRHP concurs with the avoidance procedures outlined in the plan and has no further archaeological concerns provided that the plan is fully implemented.

Please be aware that the project remains under review by [REDACTED] our Technical Services Unit.

If you have any questions, I can be reached at [REDACTED].

Sincerely,

[REDACTED]

Historic Preservation Specialist - Archaeology



KATHY HOCHUL  
Governor

ERIK KULLESEID  
Commissioner

March 15, 2024

[REDACTED]  
[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County  
21PR03978

Dear [REDACTED]:

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 February 16, 2024, including the submitted Exhibits 8 and 9. Based on that review, it appears that 128 historic resources eligible or listed in the State and National Registers of Historic Places have the potential to be impacted by the proposed undertaking. It is the OPRHP's opinion that the project, as described, will have an Adverse Impact on historic resources.

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 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 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 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).

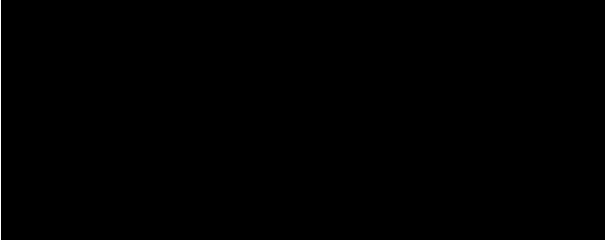
**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • parks.ny.gov

• 518-237-8643 • <https://parks.ny.gov/shpo> •

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

Sincerely,



cc: [REDACTED] – ORES

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: 21PR03978 - Hoffman Falls Wind Project  
**Date:** Thursday, March 21, 2024 3:46:28 PM  
**Attachments:** [image001.png](#)

---

[EXTERNAL SENDER]

[REDACTED]

In order to send out my finding I had to reject my request for additional info. I saw the visual simulation from [REDACTED] and I'm pleased that the views will be minimal. I would check with ORES as to whether or not they want you to revise the map to acknowledge all the resources my office determined eligible and within the ZVI.

Best,

[REDACTED]

**New York State Parks, Recreation & Historic Preservation**  
Division for Historic Preservation  
Peebles Island Resource Center

[REDACTED]

[Are you registered to vote? Register to vote online today.](#) Moved recently? Update your information with the NYS Board of Elections. Not sure if you're registered to vote? [Search your voter registration status.](#)



---

**From:** [REDACTED]  
**Sent:** Friday, March 15, 2024 4:27 PM  
**To:** [REDACTED]  
**Subject:** 21PR03978 - Hoffman Falls Wind Project

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Hi [REDACTED]

Thank you for your review of Exhibits 8 and 9 for Hoffman Falls. Just wondering, do you still need the mapping and visual simulations that were requested on February 8? That information request in CRIS is showing as "rejected."

Thanks again, and happy Friday!

[REDACTED]

[REDACTED]

[REDACTED], New York 13202

EDR a **better** environment

January 15, 2026

[REDACTED]

[REDACTED]

[REDACTED]

**RE: Hoffman Falls Wind Project  
Revised Archaeological Site Avoidance Plan  
EDR Project #21028**

Dear [REDACTED]

I am writing to provide the Oneida Indian Nation with the Revised Archaeological Site Avoidance Plan (the Plan) for the proposed Hoffman Falls Wind Project in the Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (the Facility). The proposed Facility is an approximately 100-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.

The Revised Archaeological Site Avoidance Plan is available as a PDF document for review and comment on a SharePoint site at this link: [2024\\_02\\_Hoffman\\_Falls\\_Wind\\_Revised\\_Archaeological\\_Site\\_Avoidance\\_Plan.pdf](#). The Plan (which was included as Appendix 9-i of the Facility's 94-c application) summarizes the archaeological resources identified during the Phase IB survey that were at the time located within the Area of Potential Effects (APE), and the proposed Avoidance Measures for these resources which, if not avoided, could be potentially impacted by the Facility layout. As a result of the Phase IB survey, a [REDACTED]. Following the completion of the Phase IB survey, the Facility design was modified [REDACTED] the sites fall outside of the APE. [REDACTED] 50-foot avoidance buffer.

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 ORES Primary Point of Contact for the project is [REDACTED].

[REDACTED]

The Siting Permit Application prepared for the Facility includes 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 [REDACTED].

[REDACTED]

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 [REDACTED]

We are confident that the Hoffman Falls Wind Project can be developed in a manner that is respectful of the Oneida Indian Nation's heritage.


Sincerely,



**Attachments:**

- Revised Archaeological Site Avoidance Plan

**Copy to (via email):**

, New York State Historic Preservation Office  
Office of Renewable Energy Siting

January 15, 2026

[REDACTED]

[REDACTED]

**RE: Hoffman Falls Wind Project  
Revised Archaeological Site Avoidance Plan  
EDR Project #21028**

Dear [REDACTED]:

I am writing to provide the Tuscarora Nation with the Revised Archaeological Site Avoidance Plan (the Plan) for the proposed Hoffman Falls Wind Project in the Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (the Facility). The proposed Facility is an approximately 100-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.

The Revised Archaeological Site Avoidance Plan is available as a PDF document for review and comment on a SharePoint site at this link: [2024\\_02\\_Hoffman Falls Wind Revised Archaeological Site Avoidance Plan.pdf](#).

The Plan (which was included as Appendix 9-i of the Facility's 94-c application) summarizes the archaeological resources identified during the Phase IB survey that were at the time located within the Area of Potential Effects (APE), and the proposed Avoidance Measures for these resources which, if not avoided, could be potentially impacted by the Facility layout. As a result of the Phase IB survey, [REDACTED] completion of the Phase IB survey, the Facility design was modified [REDACTED] fall outside of the APE. [REDACTED] 0-foot avoidance buffer.

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 ORES Primary Point of Contact for the project is [REDACTED].

[REDACTED]

The Siting Permit Application prepared for the Facility includes 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 [REDACTED].

[REDACTED]

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 [REDACTED]  
[REDACTED]

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

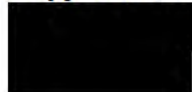
Sincerely,

[REDACTED]

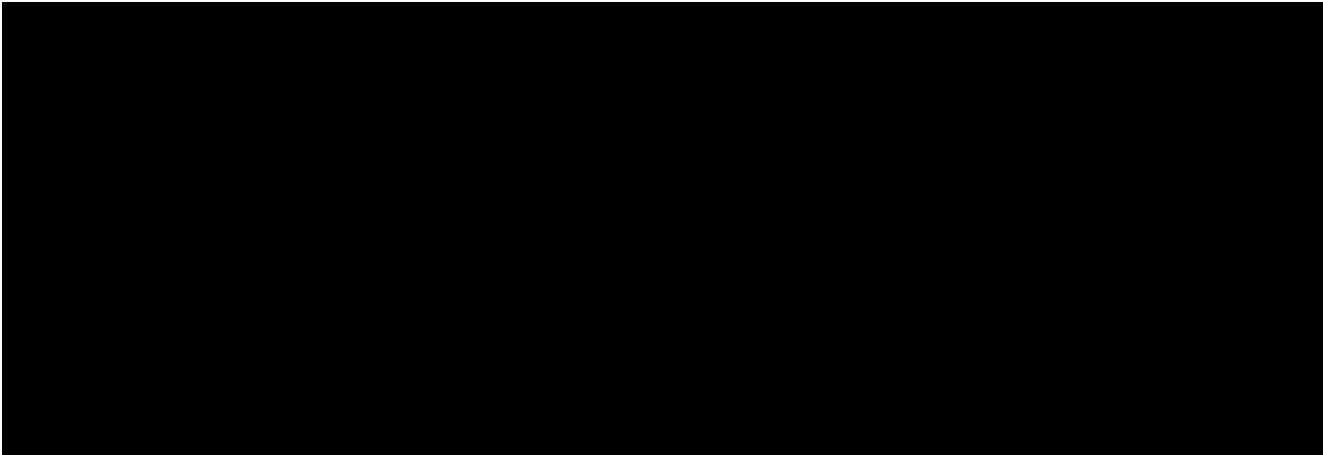
**Attachments:**

- Revised Archaeological Site Avoidance Plan

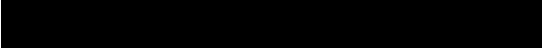
**Copy to (via email):**

 New York State Historic Preservation Office  
Office of Renewable Energy Siting

January 15, 2026



**RE: Hoffman Falls Wind Project  
Cultural Resources Surveys and Environmental Review  
Phase IB Archaeological Survey Report Addendum  
EDR Project #21028**

Dear :

I am writing to provide the Oneida Indian Nation with supplemental cultural resources survey documents for the proposed Hoffman Falls Wind Project, which is being developed by Liberty Renewables Inc. in the Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (the Facility). The proposed Facility is an approximately 100-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 May 16, 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:

- Receipt of the Article VIII Siting Permit (Summer/Fall 2025)
- Submission of the Joint Permit Application 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 [REDACTED]

We are confident that the Hoffman Falls Wind Project can be developed in a manner that is respectful of the Oneida Indian Nation's heritage.

Sincerely,

[REDACTED]

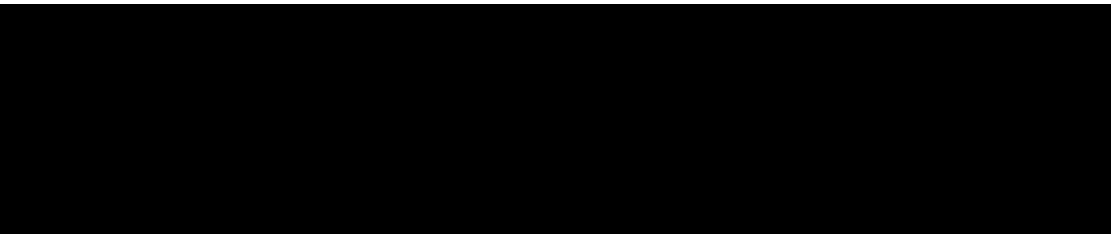
**Attachment A:**

- Phase IB Archaeological Report Addendum


**Copy to (via email):**

[REDACTED] New York State Historic Preservation Office  
[REDACTED], Office of Renewables Energy Siting

January 15, 2026



**RE: Hoffman Falls Wind Project  
Cultural Resources Surveys and Environmental Review  
Phase IB Archaeological Survey Report Addendum  
EDR Project #21028**

Dear :

I am writing to provide the Tuscarora Nation with supplemental cultural resources survey documents for the proposed Hoffman Falls Wind Project, which is being developed by Liberty Renewables Inc. in the Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (the Facility). The proposed Facility is an approximately 100-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.

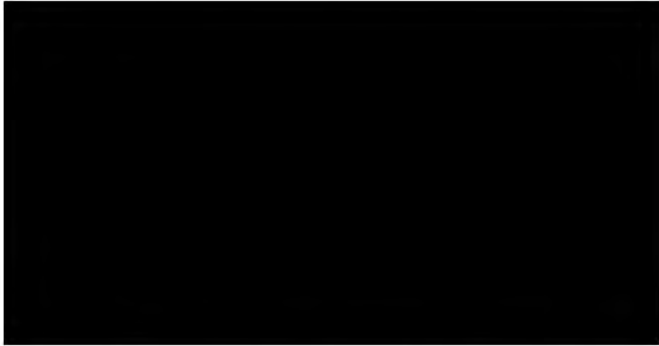
As described in our May 16, 2024 letter, Liberty Renewables Inc. is seeking a permit to construct the Facility from the Office of Renewable Energy Siting and Electric Transmission (ORES), which issues permits for major renewable energy facilities under Article VIII of the New York State Executive Law. 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:

- Receipt of the Article VIII Siting Permit (Summer/Fall 2025)
- Submission of the Joint Permit Application 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 [REDACTED]  
[REDACTED]

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



- Phase IB Archaeological Report Addendum

**Copy to (via email):**

[REDACTED], New York State Historic Preservation Office  
[REDACTED], Office of Renewables Energy Siting



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

October 10, 2024

[REDACTED]  
[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]:

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.

OPRHP has reviewed the Addendum Phase IB Archaeological Survey memo for the Hoffman Falls Wind Project (21PR03978) prepared by EDR, Consulting Archaeologists (September 2024; 22SR00082). We note that no archaeological materials were encountered during the addendum survey. OPRHP concurs with the report recommendation that no additional archaeological investigation is warranted. We have no further archaeological concerns.

Please continue to work with [REDACTED] Technical Services Unit to complete this review.

If you have any questions, I can be reached [REDACTED]

Sincerely,

[REDACTED]



August 14, 2025

[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]

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.

OPRHP has reviewed the Hoffman Falls Wind: Additional Phase IB Testing and Phase II Site Examination Notification Memo for the Hoffman Falls Wind Project prepared by EDR, Consulting Archaeologist (August 2025).

OPRHP concurs with the recommendation that an Addendum Phase IB Archaeological Survey is warranted for the newly added 25 acres of the revised APE and are issuing a request for a Phase II

[REDACTED]  
Please also share the Phase II workplan with the interested Tribal Nations and ORES for their comments.

If you have any questions, I can be reached at [REDACTED]

Sincerely,  
[REDACTED]



---

## Hoffman Falls Wind Project Phase II Workplan

---

From [REDACTED]

Date Fri 8/22/2025 2:52 PM

To [REDACTED]

Cc [REDACTED]

Dear [REDACTED]

On behalf of Hoffman Falls Wind LLC, EDR would like to notify the Oneida Nation that additional modifications to the Project's Area of Potential Effects are being considered which would result in [REDACTED]

[REDACTED] Please find the detailed Phase II workplan attached for your review and comment.

Additional updates to the permitting timelines for the Project are as follows:

- The Article VIII Application has been submitted to ORES and has been deemed complete
- The Siting Permit is anticipated to be issued in Q4 of 2025
- Construction is anticipated to begin in Q3 of 2026

We look forward to the Oneida Nation's continued consultation on this project. EDR and Hoffman Falls Wind LLC would be happy to set up a time to discuss the details of the Phase II workplan or address any questions related to the modifications of the APE.

Respectfully,

[REDACTED]



## Hoffman Falls Wind Project Phase II Workplan

From [REDACTED]

Date Fri 8/22/2025 3:03 PM

To [REDACTED]  
Cc [REDACTED]

1 attachment (4 MB)

2025-08-15\_Hoffman Falls Wind\_Phase II Workplan.pdf;

Daer Mr. Printup,

On behalf of Hoffman Falls Wind LLC, EDR would like to notify the Tuscarora Nation that additional modifications to the Project's Area of Potential Effects are being considered which would result in

[REDACTED]

Please find the detailed Phase II workplan attached for your review and comment.

Additional updates to the permitting timelines for the Project are as follows:

- The Article VIII Application has been submitted to ORES and has been deemed complete
- The Siting Permit is anticipated to be issued in Q4 of 2025
- Construction is anticipated to begin in Q3 of 2026

We look forward to the Tuscarora Nation's continued consultation on this project. EDR and Hoffman Falls Wind LLC would be happy to set up a time to discuss the details of the Phase II workplan or address any questions related to the modifications of the APE.

Respectfully,

[REDACTED]

EDR a **better** environment



**New York State  
Parks, Recreation and  
Historic Preservation**

REDACTED – Matter No. 23-02976

**KATHY HOCHUL**  
Governor

**RANDY SIMONS**  
Commissioner Pro Tempore

September 3, 2025

[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]

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.

OPRHP has reviewed the work plan for the Phase II Archaeological Survey for the Hoffman Falls Wind Project (21PR03978), [REDACTED]

OPRHP supports the methods outlined in the work plan.

If you have any questions, I can be reached at [REDACTED]

Sincerely,

[REDACTED]  
=====

Please provide the interested Indian Nations with a copy of the work plan and request that the Indian Nations provide cultural resource comments to [REDACTED] at the below email address, and copy the OPRHP/SHPO. Additionally, copies of the consultation cover letters should be provided to the OPRHP/SHPO via CRIS and to [REDACTED] Indian Nation contact information is enclosed below.

[REDACTED]

[REDACTED]

[REDACTED]



December 9, 2025

[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]

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.

OPRHP has reviewed the Phase II Archaeological Survey report for the Hoffman Falls Wind Project (21PR03978) prepared by Environmental Design & Research, D.P.C., Consulting Archaeologists (November 2025; 25SR00559). The report details investigation of [REDACTED]  
[REDACTED]

OPRHP concurs with the report recommendation that the site is Not Eligible for inclusion on the state or National Registers of Historic Places. We further concur that no additional archaeological investigation is warranted. We have no further archaeological concerns with the undertaking.

If you have any questions, I can be reached at [REDACTED]

Sincerely  
[REDACTED]



January 6, 2026

[REDACTED]  
Environmental Design & Research  
217 Montgomery Street  
Suite 1000  
Syracuse, NY 13202

Re: ORES  
Hoffman Falls Wind Project  
Towns of Fenner, Nelson and Smithfield, Madison County, NY  
21PR03978

Dear [REDACTED]

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.

OPRHP has reviewed the recently submitted Addendum Phase IB archaeological survey report for the Hoffman Falls Wind Project (21PR03978) prepared by the EDR, Consulting Archaeologists (December 2025; 25SR00604). [REDACTED]

OPRHP concurs with the report recommendation that the be avoided. The report indicates that [REDACTED]  
[REDACTED] As such, no further archaeological investigation is recommended for the area covered by the report.

If you have any questions, I can be reached at [REDACTED]

Sincerely  
[REDACTED]

January 15, 2026

[REDACTED]

RE: Hoffman Falls Wind Project  
Phase II Archaeological Site Examination Report

[REDACTED]

Dear [REDACTED]:

I am writing to provide the Oneida Indian Nation with supplemental cultural resources survey documents for the Hoffman Falls Wind Project, which is being developed by Liberty Renewables Inc. in the Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (the Facility). The Facility is an approximately 100-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 fall of 2025, slight changes to the layout and design of the Facility were made that required the completion of a Phase II archaeological investigation [REDACTED]. The site examination was conducted by Environmental Design & Research (EDR) and a Phase II Archaeological Site Examination Report for the Facility was developed. This report is provided with this letter for review and comment by the Nation.

As described in previous correspondence, Liberty Renewables Inc. was 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. This permit was issued on December 22, 2025. 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:

- Submission of Article VIII compliance filings and start of construction (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 [REDACTED]

[REDACTED]

We are confident that the Hoffman Falls Wind Project can be developed in a manner that is respectful of the Oneida Indian Nation’s heritage.

Sincerely,

[REDACTED]

**Attachment A:**

- Phase II Archaeological Site Investigation Report

**Copy to (via email):**

[REDACTED] Oneida Indian Nation  
[REDACTED], New York State Historic Preservation Office  
[REDACTED], Office of Renewables Energy Siting and Electric Transmission

January 15, 2026

[REDACTED]

[REDACTED]

RE: Hoffman Falls Wind Project  
Phase II Archaeological Site Examination Report

[REDACTED]

Dear [REDACTED]:

I am writing to provide the Tuscarora Nation with supplemental cultural resources survey documents for the Hoffman Falls Wind Project, which is being developed by Liberty Renewables Inc. in the Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (the Facility). The Facility is an approximately 100-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 fall of 2025, slight changes to the layout and design of the Facility were made that required the completion of a Phase II archaeological investigation [REDACTED]. The site examination was conducted by Environmental Design & Research (EDR) and a Phase II Archaeological Site Examination Report for the Facility was developed. This report is provided with this letter for review and comment by the Nation.

As described in previous correspondence, Liberty Renewables Inc. was 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. This permit was issued on December 22, 2025. 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:

- Submission of the Joint Permit Application to the U.S. Army Corps of Engineers (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 [REDACTED]  
[REDACTED]

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

Sincerely,

[REDACTED]  
[REDACTED]

**Attachment A:**

- Phase II Archaeological Site Investigation Report

**Copy to (via email):**

[REDACTED], New York State Historic Preservation Office  
[REDACTED] Office of Renewables Energy Siting and Electric Transmission

## **Attachment B**

Archaeological Avoidance Plan

April 22, 2026

**To:** Bradley W. Russell, Ph.D.  
Historic Preservation Specialist - Archaeology  
Division for Historic Preservation  
New York State Office of Parks, Recreation & Historic Preservation

**From:** Peter Sittig, Archaeology Project Manager  
Moira Magni, Archaeology Operations Manager  
EDR

**Date:** April 22, 2026

**Reference:** Hoffman Falls Wind Project  
Revised Archaeological Site Avoidance Plan

**NYSHPO No:** 21PR03978

### Introduction

On behalf of Hoffman Falls Wind LLC (the Applicant), a wholly owned subsidiary of Liberty Renewables Inc. Environmental Design & Research, Landscape Architecture, Engineering, and Environmental Services, D.P.C. (EDR) conducted Phase IB archaeological survey for the proposed Hoffman Falls Wind Project (the Facility), located in the Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. The proposed Facility is an approximately 100-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.

This Revised Archaeological Site Avoidance Plan (the Plan) summarizes the archaeological resources identified by the Phase IB survey that are currently located within the Area of Potential Effects (APE), and the proposed Avoidance Measures for these resources which, if not avoided could be potentially impacted by the Facility layout. In comments dated February 9, 2024, the New York State Office of Parks, Recreation & Historic Preservation (OPRHP) requested a more detailed explanation of avoidance procedures and objected to proposed grading within the 50-foot avoidance buffer around **BEGIN CONFIDENTIAL INFORMATION**< [REDACTED] >**END CONFIDENTIAL INFORMATION**. In response to these comments, EDR and the Applicant have updated the Plan to include:

- A discussion of additional protection measures that will be implemented by the Applicant to limit the risk of trespass, including erecting construction fencing along the boundaries of the Facility's proposed APE that are located adjacent to the 50-foot avoidance buffers

of archaeological sites. (see Figure 1 and Attachment A). This fencing will clearly mark the area as environmentally sensitive and “no access,”

- A commitment to mark all site/construction plans for sites recommended for avoidance with the appropriate 50-foot avoidance buffers around archaeological sites indicating the areas is environmentally sensitive, and
- An updated design to the access road adjacent to **BEGIN CONFIDENTIAL INFORMATION**< [REDACTED] >**END CONFIDENTIAL INFORMATION**. The updated access road design utilizes timber matting to fully avoid grading and other ground disturbance within the 50-foot avoidance buffer around **BEGIN CONFIDENTIAL INFORMATION**< [REDACTED] >**END CONFIDENTIAL INFORMATION**.

### Previous Archaeological Studies

The Phase IB archaeological survey was conducted within all areas categorized as elevated archaeological sensitivity that overlapped with areas that were considered for development. Phase IB archaeological survey fieldwork occurred during multiple mobilizations between October 2021 and November 2025 that were concurrent with Facility design to inform the ongoing design and facilitate the avoidance or minimization of potential impacts to sensitive archaeological resources identified by the survey. The results of the Phase IB survey detailed in the *Phase IB Archaeological Survey* report (EDR, 2023a), *Phase IB Archaeological Survey Addendum Memorandum* (EDR, 2023b), and the *Phase IB Archaeological Survey Addendum* (EDR, 2024; EDR, 2025b) and are summarized here:

**BEGIN CONFIDENTIAL INFORMATION**<

- [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] >**END CONFIDENTIAL INFORMATION**

Due to changes in Facility design that had the potential to impact **BEGIN CONFIDENTIAL INFORMATION**< [REDACTED] >**END CONFIDENTIAL INFORMATION**, EDR conducted a Phase II investigation in September 2025 within the site boundary. The Phase II site examination consisted of 40 close interval shovel test pits and two test units. The site was recommended as not eligible for the S/NRHP. The results of the Phase II examinations were submitted to NYSHPO

in the *Phase II Archaeological Site Examination Report* via CRIS on November 25, 2025 (EDR, 2025a), and on December 9, 2025, NYSHPO concurred with the recommendation that **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** is not eligible for listing on the S/NRHP and stated that no further archaeological work was recommended (NYSHPO, 2025).

### Archaeological Sites Recommended for Avoidance

The Phase IB report recommended that **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**, with the subsequent recommendation being that the site is not eligible for listing on the S/NRHP and therefore no longer requires avoidance. In an effort to avoid impacts to all unevaluated archaeological sites identified in the Phase IB survey, the Applicant has moved, modified, or eliminated several Facility components. Construction techniques were modified to avoid ground disturbance within 50 feet of all 10 remaining sites<sup>1</sup>.

Table 1 lists all **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** whose 50-foot avoidance buffers are fully avoided by the Facility layout are highlighted in green. Associated mapping clearly marking the areas as environmentally sensitive is included in Attachment A. The Applicant proposes to erect construction fencing along those edges of the APE in proximity to the 50-foot avoidance buffers of archaeological sites to limit the risk of trespass. This fencing will clearly mark those areas as environmentally sensitive and “no access.” These areas will be avoided during all phases of construction.

Since the submission of the Phase IB report, the Facility’s proposed APE was modified to include an access road within the 50-foot avoidance buffer of **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**. Originally, the Applicant had proposed limited grading within the 50-foot avoidance buffer. In response to OPRHP comments that did not support that proposal, the Applicant has redesigned the access road to install timber matting where the Facility’s limits of disturbance overlap the site’s 50-foot avoidance buffer and has removed all grading and ground disturbance. Additional information for **BEGIN**

---

<sup>1</sup> Note that in some instances the 50-foot avoidance buffer has been clipped to exclude established roadways and/or driveways where significant soil disturbance during construction and ongoing disturbance during maintenance has previously removed or compromised the stratigraphic integrity of natural soils.

CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION is included below.

BEGIN CONFIDENTIAL INFORMATION <

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

END CONFIDENTIAL INFORMATION.

**This figure has been redacted from this publicly available report because it contains sensitive/confidential archaeological site information.**

### Unanticipated Cultural Resources Discoveries Protocol

The Applicant recognizes that it is possible that unanticipated buried or aboveground archaeological features and/or artifacts may be encountered during Facility construction. Therefore, to provide additional safeguards against the possibility that the proposed Facility might impact unidentified archaeological resources, EDR, on behalf of the Applicant, will prepare an Unanticipated Cultural Resources Discovery Protocol (UDP). The UDP will outline the steps for dealing with unanticipated discoveries of cultural resources which may be encountered during construction of the proposed Facility. This protocol will include stopping work, notifying the appropriate personnel (e.g., ORES, NYSHPO, Indigenous Nations), and photographing the finds. A site visit by an archaeologist to further investigate and document the discovery may be necessary, and appropriate mitigation measures will be determined. This process will occur in consultation with NYSHPO and Native American Nation representatives as appropriate. UDPs are written to provide construction contractors guidance and protocols for identifying possible archaeological material and/or human remains uncovered during construction.

In the event of an unanticipated discovery of potential human remains and/or funerary objects, all work in the immediate vicinity will stop until further notice and the NYSHPO, the county coroner/medical examiner, local law enforcement, and all consulting parties identified in the Protocol will be contacted. The potential remains/funerary objects will be treated with respect, left *in situ* by on-site personnel, and protected from further disturbance. If human remains or funerary objects are determined to be Indigenous, a treatment plan will be developed in consultation with the NYSHPO and the appropriate Nations, consistent with established protocols and guidance. These will include NYSHPO's Human Remains Discovery Protocol (2025a), the Advisory Council on Historic Preservation's *Policy Statement on Burial Sites, Human Remains and Funerary Objects* (ACHP, 2023), and the *Haudenosaunee Policy on Human Remains* (Grand Council of the Haudenosaunee, 2014).

The NYSHPO, ACHP, and Haudenosaunee human remains protocols all require temporary suspension of activity in the vicinity of the discovery, protection of discovered remains, notification of NYSHPO and Indigenous representatives, and consultation regarding treatment of remains. The coroner and local law enforcement will make the official ruling on the nature of the remains, being either forensic or archaeological. A decision concerning avoidance or hand excavation of the burial and final disposition of the remains shall be made by consulting parties.

## Conclusion

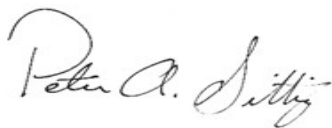
To avoid impacts to the unevaluated archaeological sites identified in the Phase IB survey, the Applicant has moved or modified a number of Facility components. Areas within 50 feet of **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** is located within 50 feet of the Facility's APE. Since the submission of the Phase IB survey report, the Facility's proposed APE was modified to include an access road in row cropland within 50 feet of **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**. In a previous version of this Plan, the Applicant had proposed limited grading within the 50-foot avoidance buffer. As a response to OPRHP comments, the Applicant has redesigned the access road and removed all grading from within the site's 50-foot avoidance buffer. In addition, the Applicant has committed to the use of timber matting within that area to fully avoid ground disturbance. As such, EDR recommends that **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** have been fully avoided by the proposed Facility and is requesting concurrence from OPRHP on this recommendation.

To provide additional safeguards against the possibility that the proposed Facility might impact unidentified archaeological resources, EDR, on behalf of the Applicant, will prepare an UDP which will outline the steps for dealing with unanticipated discoveries of cultural resources which may be encountered during construction of the proposed Facility.

If you have any questions/concerns or would like to discuss the information described herein, please contact me at [REDACTED] or [REDACTED] and/or Doug Pippin at [REDACTED] or [REDACTED].

Thank you very much for your time.

Sincerely,



Peter Sittig, MPS, RPA

EDR Archaeology Project Manager

### Attachments:

Attachment A. Archaeological Sites Avoided by Facility Construction

### References

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EDR. 2025a. *Phase II Archaeological Site Examination, USN 05312.000038, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York*. Prepared for Liberty Renewables, Inc. by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. November 2025.

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New York State Office of Parks, Recreation, and Historic Preservation (NYSHPO). 2005. *New York State Historic Preservation Office (SHPO) Phase I Archaeological Report Format Requirements*. On file, New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY. Available at <https://cris.parks.ny.gov/>.

New York State Office of Parks, Recreation, and Historic Preservation (NYSHPO). 2025a. *New York State Historic Preservation Office Human Remains Discovery Protocol*. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY.

NYSHPO. 2025b. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Bradley Russell (NYSHPO) to Kristen Olson (EDR). NYSOPRHP, Waterford, NY. Via email, December 9, 2025.

**Attachment A**  
**Archaeological Sites Avoided by Facility Construction**

**This figure has been redacted from this publicly available report because it contains sensitive/confidential archaeological site information.**

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## **Attachment C**

### **Unanticipated Discovery Protocol**

# Unanticipated Discovery Protocol

## Hoffman Falls Wind Project

Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County,  
New York

REDACTED- ORES Matter No. 23-02976

Prepared for:

Hoffman Falls Wind LLC



>END CONFIDENTIAL INFORMATION

Prepared by:



Environmental Design & Research, D.P.C.  
217 Montgomery Street, Suite 1100  
Syracuse, New York 13202  
[www.edrdpc.com](http://www.edrdpc.com)

April 2026

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Attachment B: Human Remains Protocols and Guidance

## 1.0 SUMMARY ABSTRACT

Hoffman Falls Wind LLC, a wholly owned subsidiary of Liberty Renewables, Inc. (Liberty Ren, is planning to construct a solar generating facility in the Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (hereafter, the Facility). The Facility overlaps some areas of elevated sensitivity for historic-period and Indigenous archaeological sites. This Unanticipated Discovery Protocol (UDP, or the Protocol) provides guidance and instruction to Liberty Renewables, the Construction Contractor and its personnel, and consultants as to the proper procedures to be followed in the event of an unanticipated cultural resource discovery. This Protocol applies to all areas of the Facility Site, which constitute those parcels, or portions of parcels, currently under lease (or other real property interests) for the location of all Facility components.

This Protocol outlines the steps to be taken in the event an unanticipated discovery of cultural resources is made during construction of the Facility. The following list describes those steps:

1. Initial discovery and notification
2. Remote/virtual consultation by an archaeologist
3. Site visit by an archaeologist, if necessary, and memorandum
4. Agency and Nations consultation
5. Archaeological mitigation measures
  - a. Avoidance measures, in consultation with Agencies and Nations
  - b. Additional archaeological investigations, if determined necessary in consultation
6. Reporting and further consultation

Additional information is provided in the attachments, including details on whom to contact in the event of discoveries (Attachment A) and the protocols/guidelines for the discovery of human remains (Attachment B).

## 2.0 KEY TERMS AND RESPONSIBILITIES

The following terms and responsibilities are used throughout this Protocol:

- **Agencies:** Refers to the state and federal agencies included in the consultation process for the Facility. Please see Attachment A for the full contact list:
  - New York State Historic Preservation Office (NYSHPO)
  - New York State Department of Public Service (DPS)
  - Office of Renewable Energy Siting and Electric Transmission (ORES)

Depending on the nature and location of the discovery, additional state and/or federal agencies may be involved in consultation.

- **Archaeological Consultant (the Archaeologist):** Liberty Renewables' cultural resources consultant(s). Review of any potential unanticipated discoveries will be conducted under the supervision of a cultural resource professional who meets the U.S. Secretary of the Interior's Standards for Archaeology and Historic Preservation (36 CFR Part 61).
- **Archaeological Site:** Any concentration of Cultural Material that was previously recorded and noted in the NYSHPO database, a location that was delineated in the course of the Phase IB archaeological surveys, and/or any unanticipated discoveries of cultural resources that would constitute a site as defined by the NYSHPO in the adopted the New York Archaeological Council's *Standards for Cultural Resource Investigations and the Curation of Archaeological Collections in New York State* (the NYAC Standards; NYAC, 1994). *Note: discoveries of individual artifacts (or "isolates") are not considered archaeological sites.*
- **Area of Potential Effects (APE):** All areas of potential soil/rock disturbance associated with the construction and operation of the proposed Facility.
- **Construction Contractor (the Contractor):** The individual, firm, or corporation undertaking the execution of the construction work under the terms of the contract and acting directly or through his, her, their, or its agents or employees.
- **Construction Manager:** The Construction Manager, in conjunction with the Environmental Monitor or his/her designee, is responsible for ensuring that construction work is stopped or slowed promptly upon request by the Archaeologist. They are responsible for the initial halting of construction activities in the vicinity of an unanticipated discovery, until reviewed by the Archaeologist.
- **Consulting Parties:** Refers to all the groups involved with the Facility construction, permitting, and oversight. These include Liberty Renewables, the Contractor, Agencies, and the Nations.
- **Cultural Material:** Any object or area made/modified by a person, including artifacts, concentrations of objects/artifacts, features, monuments, or their remains. Cultural material considered to be significant for this Facility must be greater than 50 years old, in accordance with the National Register of Historic Places standards.

- **Environmental Monitor:** Serves as the single point of contact for coordination with the Facility. The Environmental Monitor has the authority, in conjunction with the Construction Site Manager, to issue stop-work orders, when necessary. The Environmental Monitor is responsible for the protection of previously unrecorded cultural material until such time as the Archaeologist reviews them.
- **The Facility:** Collectively refers to all components of the proposed project, including PV panels and supporting infrastructure.
- **Funerary Items:** Objects that have been intentionally buried with a person, including but not limited to personal effects, pottery, jewelry, tools, brass kettles, bone-handled knives, etc.
- **Human Remains:** Any human bones, complete or fragmentary, articulated or disarticulated. Any bone or bone fragment identified during any excavation work will be considered potential human remains until the Archaeologist can examine it.
- **Nations:** Refers to indigenous, sovereign people with a contemporary and/or ancestral connection to the Facility Site, who are included in the consultation process:
  - Oneida Nation
  - Tuscarora Nation
- **Project Manager:** Serves as the single point of contact for coordination with the project. The Project Manager has the authority for, in conjunction with the Construction Site Manager, stop-work orders when necessary. The Project Manager is responsible for the protection of previously unrecorded cultural material until such time as the Archaeologist reviews them.
- **State/National Register of Historic Places (S/NRHP):** The State of New York and/or nation's official lists of significant historic, architectural, archaeological, and cultural resources worthy of preservation, established as part of the National Historic Preservation Act of 1966.

### 3.0 PROJECT BACKGROUND

Liberty Renewables has been issued a Siting Permit to construct the Hoffman Falls Wind Project (the Facility) in Towns of Eaton, Fenner, Nelson, and Smithfield in Madison County, New York. The Facility is a wind energy generation facility and associated infrastructure.

In 2023, EDR completed Phase IB archaeological survey of the area of potential effect (APE) of the proposed Facility (EDR, 2023a; EDR, 2023b). The purpose of the Phase IB survey was to determine whether archaeological sites are located in the areas that may be affected by the proposed Facility. Liberty Renewables has developed a layout that would allow for construction of the Facility while minimizing soil disturbance and the associated impacts to archaeological resources to the greatest extent practicable.

The Facility overlaps some areas of elevated sensitivity for previously unrecorded archaeological resources. Liberty Renewables, Inc. recognizes that despite previous archaeological investigations, it is possible that unanticipated buried or aboveground archaeological features and/or artifacts may be encountered during project construction or maintenance. EDR has prepared this Protocol to provide guidance for this possibility.

#### 3.1 Training and Orientation

The Archaeologist will provide information to Construction Contractor personnel as to the type and variety of cultural resources that may be encountered so that they can be more readily identified in the field.

Examples of cultural resources that may be unearthed in below-surface layers of artifact-bearing sediments include but are not limited to:

- Prehistoric shell middens, lithic and ceramic artifacts
- Human and animal bone
- Historic artifacts (e.g., green, aqua, or blue glass; lead, copper, and iron items; wheels; and barrels, among others)
- Remnants of brick or rock walls of historical structures
- Wooden beams beneath brick walls
- Old paved surfaces (e.g., cobble, flagstone, or wooden planking).

The Construction Manager and/or Environmental Monitor will ensure that Construction Contractor personnel are made aware of the procedures they must follow in the event of an unanticipated discovery anywhere within the Facility Site (Sections 4.0 and 5.0). All Construction Contractor personnel will be advised of the need to immediately stop work if they observe any indications of the presence of an unanticipated cultural resource discovery. Construction Contractor personnel will be instructed to immediately contact the Construction Manager upon the observation of a potential unanticipated discovery for implementation of this Protocol.

The Environmental Monitor and Construction Manager will stress the necessity of compliance with this Protocol and special emphasis and attention will be given to potential circumstances involving human remains. The Environmental Monitor and Construction Manager will stress the importance of treating any

human remains, or potential human remains, encountered during construction of the Facility with the utmost dignity and respect.

## 4.0 PROCEDURES FOR THE UNANTICIPATED DISCOVERY OF CULTURAL RESOURCES

This section describes the procedures that will be followed in the event of the discovery of cultural resources during construction activities. If, at any point during the process it is determined that the discovery is comprised of human remains, the procedures described in Section 5.0 will be followed.

It is important that all of the contact information provided in Attachment A be updated throughout the duration of construction, so that the appropriate individuals may be contacted during the steps outlined herein.

All correspondence for the unanticipated discovery will be provided by email. In addition, memoranda and reports will be uploaded to the NYSHPO Cultural Resources Information System (CRIS) website.

### 4.1 Initial Discovery and Notification

If any Construction Contractor personnel believe that potential archaeological materials/artifacts or stone features have been encountered, they will stop work in the immediate vicinity of the find and notify the Construction Manager.

The Construction Manager or Environmental Monitor will immediately notify the Archaeological Consultant and Liberty Renewables by telephone and/or email. In addition, within twenty-four hours of such discovery, the Environmental Monitor shall notify and consult with DPS staff, the ORES Agency Preservation Officer, and the New York State Office of Parks, Recreation, and Historic Preservation Field Services Bureau to determine the best course of action. The Environmental Monitor or their designee will provide photographs of the discovery, except in the case of suspected or confirmed human remains and associated materials, and if possible, a precise GPS location of the discovery to assist the Archaeologist in the determination of significance.

The potential archaeological features and/or artifacts will be left in place and not disturbed. No materials will be collected or removed until an appropriate investigation and consultation have taken place.

Should archaeological materials be encountered during construction, Liberty Renewables will stabilize the area and cease all ground disturbing activities in the immediate vicinity (within 100 feet) of the find and protect the find from further damage. The restricted areas would extend from the maximum discernable limit of the archaeological materials. Within 24 hours of such discovery, Liberty Renewables will notify and consult with DPS staff, the ORES Agency Preservation Officer, and the NYSHPO to determine the best course of action. No construction activities shall be permitted in the vicinity (within 100 feet) of the find until such time as the significance of the resource has been evaluated and the need for and scope of impact mitigation has been determined. The only earth-moving activities that may occur within the restricted areas prior to notifications are those necessary for immediate stabilization of the exposed archaeological materials. The Contractor will flag, fence off, or securely cover the archaeological discovery location and take reasonable measures to ensure site security. The area will be regarded as off-limits but will not be identified as an archaeological site or stone feature in order to protect the confidentiality of the discovery. Vehicles and equipment may be permitted to traverse the area surrounding the delineated area if necessary; however,

such movement will be minimized to the extent practical, and no vehicles or equipment will be permitted within the delineated area.

#### **4.2 Remote/Virtual Consultation by an Archaeologist**

It may be possible for the Archaeologist to confirm the nature of an unanticipated discovery remotely through a review of photographs taken on-site and phone conversations with Construction Contractor personnel.

If it can be determined that the discovery is not significant, then construction may proceed as normal. The types of cultural resources that could be encountered, and determined not significant, might include disarticulated artifacts, modern refuse, and/or isolated animal bones outside any other cultural context.

If it is determined in the virtual review that the discovery warrants further evaluation, the Archaeologist will schedule a site visit for further inspection. If necessary, it is anticipated that this visit will take place within two business days of the initial discovery. Construction will remain suspended in the vicinity of the find (i.e., at least a 100-foot radius) until a site visit can be conducted.

#### **4.3 Site Visit by an Archaeologist**

The Archaeologist will conduct a site visit, if necessary, within approximately two business days. The Archaeologist will examine the discovery and determine if it is a potentially significant archaeological site. All ground-disturbing activities within 100 feet of the discovery will remain suspended, until such time as it is determined that construction in this area may continue.

If the Archaeologist determines no archaeological site is present, they will immediately advise the Environmental Monitor and Construction Manager that the stop work order can be removed. If the DPS and NYSHPO have already been notified about the discovery, then the Archaeologist will notify them that no archaeological site is present. However, if the DPS and NYSHPO have not been notified of the discovery prior to a determination that no site is present, then notification to them will not be necessary.

If the Archaeologist determines the discovery to be a potentially significant archaeological site, they will immediately notify all Consulting Parties and proceed with the steps outlined in Sections 4.4 through 4.6. As noted previously, if it is immediately determined that the discovery is comprised of human remains, the procedures in Section 5.0 will be followed.

The Archaeologist will prepare and distribute an initial site inspection memorandum to all Consulting Parties. This will be considered a confidential document. It will include photographs except in the case of suspected or confirmed human remains and associated materials, and details of the discovery and will be provided within approximately two business days of the determination that an archaeological site has been discovered.

#### **4.4 Agency and Nations Consultation**

If the Archaeologist determines that an archaeological site has been discovered, they will request consultation with the Agencies and Nations, following the site visit and distribution of the memorandum.

The Archaeologist will detail the findings from the site visit and provide an estimation about the potential significance with respect to the S/NRHP.

The consultation process will determine what course of action to follow to resolve the unanticipated discovery, which may be avoidance or additional archaeological investigations, as described in Section 4.5. The Archaeologist will propose a written work plan for any subsequent investigations. Liberty Renewables will request that the Agencies provide a written response to the chosen course of action within a reasonable timeframe.

#### **4.5 Archaeological Site Avoidance or Additional Investigations**

The courses of action chosen in the presence of an archaeological or cultural resource may take the form of avoidance and site protection, or additional archaeological investigations to determine significance (Phase II) and/or for archaeological data recovery (Phase III).

##### *4.5.1 Avoidance Measures*

If the Archaeologist determines that an archaeological site may be significant with respect to inclusion in the S/NRHP, Liberty Renewables may choose to avoid the site entirely instead of conducting further archaeological investigations. At a minimum, avoidance measures for the archaeological resource would include delineating the resource as well as an additional buffer area around it with high visibility construction fencing and signage that reads Environmentally Sensitive Area. Detailed site protection measures will be determined in consultation with the Agencies and Nations.

Construction activities will continue to avoid archaeological resources while avoidance measures are formulated. No construction may take place within the resource itself or within 100 feet of the resource, and the resource will not be labeled as an archaeological resource on construction mapping to protect its confidentiality.

Proposed avoidance measures, with supporting mapping, will be detailed by the Archaeologist in an Archaeological Avoidance Plan memorandum, which will be submitted to the Agencies and Nations in a timely manner.

If agreed upon by the Consulting Parties, avoidance of the archaeological resource will obviate the need for additional archaeological field investigation.

##### *4.5.2 Additional Archaeological Investigations*

If the Archaeologist determines that an archaeological resource may be significant to the S/NRHP, and avoidance is not feasible, the Agencies may request a Phase II Site Investigation or Phase III Archaeological Data Recovery. The Archaeologist will prepare and submit an Archaeology Research Design memorandum, if requested. Depending on the nature of the find, the Agencies may recommend a Phase III data recovery after the initial discovery, forgoing the Phase II investigation. If a Phase II investigation is recommended, it may subsequently be followed by Phase III data recovery.

If the proposed avoidance or additional data collection measures can reasonably be conducted concurrently with ongoing Facility construction, the submission to the NYSHPO, DPS, and ORES will be accompanied by a request to resume construction in the area of the discovery. Liberty Renewables will request that the Agencies provide a response to the request within a reasonable timeframe.

Implementation of proposed Phase II or Phase III measures will not proceed until directed by the Agencies. The Archaeologist will notify the Agencies and Nations at the completion of all measures. If construction has been halted during mitigation, Liberty Renewables will also request authorization from the NYSHPO to resume construction at the conclusion of Phase II or III measures.

During Phase II or Phase III studies, Nations' representatives may observe any proposed work at the site. A reasonable and good-faith effort will be made to accommodate requests from Nations' representatives to be present while implementing Phase II or Phase III measures.

#### **4.6 Reporting and Further Consultation**

The Archaeologist will submit a summary memorandum to the NYSHPO via the CRIS website of the Phase II and/or Phase III results within a reasonable timeframe from the completion of mitigation fieldwork. The Archaeologist will submit these materials to ORES and DPS via email concurrently with the submission to the NYSHPO.

The Phase II and/or Phase III report will be submitted via CRIS based on a schedule to be established through consultation with the Agencies and Nations. Final reports will adhere to the NYAC *Standards* (NYAC, 1994).

## **5.0 PROCEDURES IN THE EVENT OF UNANTICIPATED DISCOVERY OF HUMAN REMAINS**

The procedures herein will apply regardless of the ethnicity or date of interment of the human remains. It is crucial that all human remains (or potential human remains) be treated with the utmost respect.

If a discovery is determined to be human remains, the procedures in Sections 4.1 to 4.4 will be followed, and the following additional procedures described in this section are required. These procedures also apply if the discovery of human remains is made during Phase II or Phase III investigations.

Liberty Renewables will ensure that, should human remains or evidence of human burials be encountered during archaeological data recovery fieldwork or during construction, all work in the vicinity (within 100 feet) of the find is halted immediately and the remains are protected from further disturbance. Within twenty-four hours of any such discovery, Liberty Renewables will notify and consult with DPS staff, the ORES Agency Preservation Officer, and the NYSHPO. Liberty Renewables will ensure that treatment of human remains is done in accordance with the NYSHPO's Human Remains Discovery Protocol, and that all archaeological or remains-related encounters and their handling is reported in the status reports summarizing construction activities and reviewed in the site compliance audit inspections.

If identified as Indigenous or potentially Indigenous, no photographs of Indigenous human remains and associated materials will be taken without consulting with the involved Indigenous Nations, per the NYSHPO's Human Remains Discovery Protocol. The press will not be notified of the identification of human remains.

### **5.1 Initial Assessment of Human Remains by an Archaeologist**

The Archaeologist will conduct an initial assessment at the site to determine if the discovery is made up of human remains. If the bone is determined to be animal—within an archaeological context or not—the Archaeologist will notify all parties in writing as soon as practicable. If the discovery is determined to be animal bone in an archaeological context, the procedures outlined in Section 4.1 to 4.4 will be followed.

If the Archaeologist is not able to definitively identify the discovery as human remains, but feels that additional, specialized analysis may be needed, they will inform all parties in writing as soon as that determination is made. At such time, the Archaeologist, or Liberty Renewables, will notify law enforcement, the county coroner, and/or a forensic specialist, Agencies, and Nations immediately that the skeletal remains are, or may be, human remains.

### **5.2 Forensic Analysis**

No additional work or examination will occur at the discovery site until law enforcement, the county coroner, and/or a forensic specialist have arrived on the scene and made an official ruling on the identification (*i.e.*, human or animal) and the nature and context of the remains. The coroner and local law enforcement will make the official ruling on the nature of the remains within 96 hours, being either forensic or archaeological. If any such remains appear to the coroner or medical examiner to be historic or Native American, the coroner or medical examiner shall immediately provide notice of the discovery of such remains to the state

archaeologist (Attachment A). The coroner or medical examiner and the state archaeologist will be informed that this project was reviewed under Section 14.09 of the New York State Historic Preservation Act.

The Agencies and Nations will be kept informed of any updates from the outside investigation of the human remains. Throughout this process, Liberty Renewables will continue to avoid disturbance to the site and fully cooperate with the investigation.

The results of the investigation from law enforcement, the county coroner, and/or a forensic specialist, and the next steps for the disposition and/or protection of the human remains will be determined in consultation with the Agencies and the Nations. Please note: avoidance is the preferred mitigation by the Agencies and the Nations.

A Human Remains Treatment Plan will be developed in consultation with defined stakeholders, consistent with established protocols and guidance. These will include the *Haudenosaunee Policy on Human Remains* (Grand Council of the Haudenosaunee, 2002), the NYSHPO's (2025) *Human Remains Discovery Protocol*, and the Advisory Council on Historic Preservation's (2023) *Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects*. Copies of these documents are included in Attachment B.

## 6.0 PREVIOUS CULTURAL RESOURCES STUDIES AND ASSOCIATED DOCUMENTS

Advisory Council on Historic Preservation (ACHP). 2023. *Policy Statement on Burial Sites, Human Remains, and Funerary Objects*. ACHP, Washington, DC.

Environmental Design and Research, Landscape Architecture, Engineering, and Environmental Services, D.P.C. (EDR). 2023a. Phase IB Archaeological Survey Report, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Hoffman Falls Wind LLC, Subsidiary of Liberty Renewables, Inc., by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. December 2023.

EDR. 2023b. Phase IB Archaeological Survey Addendum Memorandum, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York. Prepared for Hoffman Falls Wind LLC, Subsidiary of Liberty Renewables, Inc., by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. December 2023.

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NYSHPO. 2025. New York State Historic Preservation Office (NYSHPO) *Human Remains Discovery Protocol*. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY. New York Archaeological Council (NYAC Standards). 1994. *Standards for Cultural Resource Investigations and the Curation of Archaeological Collections in New York State*. Adopted by the New York State Office of Parks, Recreation, and Historic Preservation.

## Attachment A

### Contact Personnel for Unanticipated Discoveries

**BEGIN CONFIDENTIAL INFORMATION <**

Hoffman Falls Wind Project  
Unanticipated Discovery Protocol



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

>END CONFIDENTIAL INFORMATION

## **Attachment B**

### Human Remains Protocols and Guidance

**State Historic Preservation Office/  
New York State Office of Parks, Recreation and Historic Preservation  
Human Remains Discovery Protocol  
(January 2025)**

If human remains are encountered during construction or archaeological investigations for projects being reviewed under Section 14.09 of the State Historic Preservation Act or Section 106 of the National Historic Preservation Act, the New York State Historic Preservation Office (“SHPO”) recommends that the following protocol be implemented.

- Human remains shall be treated with dignity and respect. Should human remains or suspected human remains be encountered, work in the general area of the discovery shall stop immediately and the location shall be secured and protected from damage and disturbance.
- If skeletal remains are identified and the archaeologist is not able to conclusively determine if they are human, the remains and any associated materials shall be left in place. A qualified forensic anthropologist, bioarchaeologist, or physical anthropologist shall assess the remains in situ to help determine if they are human.
- If the remains are determined to be human, law enforcement, the SHPO, the appropriate Indigenous Nations, and the involved state and federal agencies shall be notified immediately. If law enforcement determines that the burial site is not a criminal matter, no skeletal remains or associated materials shall be removed until appropriate consultation has concluded.
- If human remains are determined to be Indigenous, they shall be left in place and protected from further disturbance until a plan for their avoidance or removal is fully implemented. Please note that avoidance is the preferred option of the SHPO and the Indigenous Nations. The involved agency shall consult SHPO and the appropriate Indigenous Nations to develop a plan of action. Photographs of Indigenous human remains and associated materials should not be taken without consulting with the involved Indigenous Nations.
- If human remains are determined to be non-Indigenous, the remains shall be left in place and protected from further disturbance until a plan for their avoidance or removal is fully implemented. Please note that avoidance is the preferred option of the SHPO. The involved agency shall consult SHPO and other appropriate parties to develop a plan of action.
- The SHPO recommends that burial information is not released to the public to protect burial sites from possible looting.

NOTE: If human remains are encountered outside of a Section 14.09 or Section 106 project, you must follow the procedures of the New York State Unmarked Burial Site Protection Act (<https://nysm.nysed.gov/unmarked-burial-site-protection-act>).



## ADVISORY COUNCIL ON HISTORIC PRESERVATION POLICY STATEMENT ON BURIAL SITES, HUMAN REMAINS, AND FUNERARY OBJECTS

March 1, 2023

**Preamble.** The Advisory Council on Historic Preservation (ACHP) developed this policy statement to establish a set of principles and rules that the ACHP will encourage federal agencies to adopt as they carry out their day-to-day responsibilities under Section 106 of the National Historic Preservation Act (NHPA). This statement also establishes a set of standards and guidelines that federal and state agencies, local entities, Indian Tribes, industry applicants, and other relevant entities should, at a minimum, seek to implement in order to provide burial sites, human remains, and funerary objects the consideration and protection they deserve.

This policy statement is not bound by geography, ethnicity, political or socioeconomic status, or a system of belief and recognizes that the respectful consideration for burial sites, human remains, and funerary objects is a human rights concern shared by all. However, the burial sites, human remains, and funerary objects of certain groups of people, including but not limited to Indian Tribes, Native Hawaiians, enslaved Africans and their descendants, and other Indigenous Peoples, have a higher probability of being unmarked and undocumented and thus more likely to be affected by development projects. As such, this policy statement emphasizes the need for consultation and coordination with those communities, including seeking consensus in decision making and providing deference to their practices, protocols, and preferences, where feasible.

Section 106 requires agencies to consult and seek agreement with consulting parties on measures to avoid, minimize, or mitigate adverse effects to historic properties. Accordingly, and consistent with Section 106, this policy does not recommend a specific outcome from the consultation process. Rather, it focuses on issues and perspectives that federal agencies should consider while carrying out their consultation and decision-making responsibilities. The ACHP will incorporate these principles in its work and encourages federal agencies and other entities to apply the principles in this policy any time there is potential to encounter burial sites, human remains, or funerary objects.

In many cases, burial sites, human remains, and funerary objects are subject to other applicable federal, Tribal, state, or local laws or protocols that may prescribe a specific outcome, such as the Native American Graves Protection and Repatriation Act (NAGPRA). In those scenarios, the federal agency should identify and follow all applicable laws or protocols and implement any prescribed outcomes. NHPA and NAGPRA are separate and distinct laws, with separate and distinct implementing regulations and categories of parties that must be consulted.<sup>1</sup> Compliance with one of these laws does not equate to or fulfill the compliance requirements of the other. Implementation of this policy and its principles does not, in any way, change, modify, or detract from NAGPRA or other applicable laws.

**Authority:** The authority for this policy stems from the ACHP's statutory responsibility to advise on matters relating to historic preservation (which includes the role of Indian Tribes, Tribal Historic

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<sup>1</sup> The ACHP's publication [Consultation with Indian Tribes in the Section 106 Process: The Handbook](#) (2021) and the National Association of Tribal Historic Preservation Officers' publication [Tribal Consultation: Best Practices in Historic Preservation](#) (2005) provide additional guidance.

Preservation Officers [THPOs], and Native Hawaiian organizations [NHOs] in that process), to advise the President and Congress regarding historic preservation matters, and to recommend methods to federal agencies to improve the effectiveness, coordination, and consistency of their historic preservation policies. While the ACHP recognizes that not all burial sites, human remains, and funerary objects may constitute or be associated with historic properties eligible for or listed in the National Register of Historic Places, the consideration and treatment of such places fall within the concerns of the historic preservation community.<sup>2</sup>

This policy statement recognizes the unique legal and political relationship between the federal government and federally recognized Indian Tribes as set forth in the Constitution of the United States, treaties, statutes, and court decisions, and acknowledges that the federal Indian trust responsibility is a legal obligation under which the United States “has charged itself with moral obligations of the highest responsibility and trust” toward Indian Tribes.<sup>3</sup> Part of the ACHP’s trust responsibility is to ensure that the regulations implementing Section 106 incorporate the procedural requirement that federal agencies consult with Indian Tribes and NHOs that attach religious and cultural significance to historic properties that may be affected by undertakings the federal agency proposes to carry out, license, permit, or assist.<sup>4</sup> In general, the trust responsibility establishes fiduciary obligations on the part of federal agencies to Tribes, including a duty to protect Tribal lands and cultural and natural resources for the benefit of Tribes and individual Tribal members.

The ACHP views its trust responsibility as encompassing all aspects of historic resources including intangible values.<sup>5</sup> As part of that trust responsibility, the ACHP offers this policy statement to inform how the Section 106 consultation process should consider burial sites, human remains, and funerary objects.

**Principles.** The care for and consideration of burial sites, human remains, and funerary objects is of significant social and moral consequence in the United States and U.S. territories. When burial sites, human remains, or funerary objects are or have the potential to be encountered during the planning or implementation of a proposed federal undertaking, the following principles should be adhered to:

**Principle 1:** Burial sites, human remains, and funerary objects should be treated with dignity and respect in all circumstances regardless of National Register eligibility or the circumstances of the action. This includes, but is not limited to, all times prior to and during consultation, during field surveys, when handling must occur, in documenting and/or reporting, if treatment actions occur, and in all other forms of interaction.

**Principle 2:** Disturbing or disinterring burial sites, human remains, or funerary objects, when not requested by descendants, associated Indian Tribes or NHOs, or required by applicable law or regulation, should not be pursued unless there are no other alternatives available and only after consultation with descendants or associated communities and fully considered avoidance of impact and preservation in place.

**Principle 3:** Only through consultation, which includes the early and meaningful exchange of information and a concerted effort to reach consensus, can informed decisions be made about the identification, documentation, National Register eligibility, and treatment of burial sites, human remains, and funerary objects.

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<sup>2</sup> 54 U.S.C. §§ 304102 and 304108

<sup>3</sup> *Seminole Nation v. United States*, 316 U.S. 286 (1942)

<sup>4</sup> [“The Advisory Council on Historic Preservation’s Statement on Its Trust Responsibility”](#) (Advisory Council on Historic Preservation, 2004)

<sup>5</sup> [“Policy Statement Regarding the Council’s Relationship with Indian Tribes”](#) (Advisory Council on Historic Preservation, 2000)

**Principle 4:** To the maximum extent possible, decision making should give deference to the treatment requests of descendants or associated communities. Where known, and in accordance with applicable law, cultural practices of the descendants or associated communities should be followed if burial sites, human remains, or funerary objects may be encountered, are inadvertently identified, impacted, or must be disinterred.

**Principle 5:** The Indigenous Knowledge held by an Indian Tribe, NHO, or other Indigenous Peoples is a valid and self-supporting source of information. To the fullest extent possible, deference should be provided to the Indigenous Knowledge and expertise of Indian Tribes, NHOs, and Indigenous Peoples in the identification, documentation, evaluation, assessment, and treatment of their burial sites, human remains, and funerary objects.

**Principle 6:** Burial sites, human remains, and funerary objects are important in and of their own right. They may also constitute or be part of a sacred site and may include or incorporate several possible elements of historic significance including religious and cultural significance. The integrity of burial sites, human remains, and funerary objects is best informed by those who ascribe significance to them.

**Principle 7:** Burial sites, human remains, and funerary objects are frequently associated with cultural practices, sacred sites, Indigenous Knowledge, and other forms of culturally sensitive actions and/or information unique to a people. Maximum effort should be taken to limit the disclosure of confidential or sensitive information through all available mechanisms including, but not limited to, the proper handling and labeling of records, limiting documentation to necessary information, and through the application of existing law.

**Principle 8:** The federal Indian boarding school system directly targeted American Indian, Alaska Native, and Native Hawaiian children in the pursuit of a policy of cultural assimilation that coincided with territorial dispossession. In partnership with the historic preservation community, federal agencies should seek to implement the recommendations identified in the Department of the Interior's *Federal Indian Boarding School Investigative Report* by supporting community-driven identification, documentation, interpretation, protection, preservation, reclamation, and co-management of burial sites, human remains, and funerary objects across that system, including marked and unmarked burial areas, and supporting repatriation where appropriate.

**Principle 9:** The legacies of colonization, including cultural assimilation, forced relocation, and slavery, have led to an uneven awareness of where and why practitioners are likely to encounter burial sites, human remains, and funerary objects across the United States and its territories. The historic preservation community has a key role in expanding public education to support greater awareness of and consideration for the histories and lifeways of Indian Tribes, Native Hawaiians, enslaved Africans and their descendants, and Indigenous Peoples including recognizing and respecting the historical trauma that these groups and individuals may experience.

**Principle 10:** Access to and/or repatriation of burial sites, human remains, and funerary objects should be enabled through fair, transparent, and effective mechanisms developed in conjunction with descendant communities to the fullest extent of the law.

**Principle 11:** Human remains and funerary objects may be relocated or removed from a location by or at the request of descendant communities for a variety of reasons. The continued presence of human remains or funerary objects may not be essential to the ongoing significance and integrity of a site or its relevance to a broad theme in history. The historic significance and integrity of such sites are best determined in consultation with lineal descendants and/or associated communities.

**Principle 12:** Climate change can impact the burial sites, sacred sites, cemeteries, and associated cultural practices significant to Indian Tribes, NHOs, and other groups of people. Climate plans should be developed in consultation and should include mechanisms to support the advanced identification and protection or treatment of these locations.

**Principle 13:** Respectful consideration of burial sites, human remains or funerary objects may require additional assistance from consulting parties to properly identify, document, evaluate for National Register eligibility, and/or conduct treatment actions. If a federal agency requests or relies on an Indian Tribe, NHO, or other party to carry out activities that are the federal agency's responsibility under the NHPA, the Indian Tribe, NHO, or other consulting party should be reimbursed or compensated.<sup>6</sup>

**Implementation of the Policy.** Implementation of this policy statement is the responsibility of the ACHP's leadership and staff; however, the ACHP recognizes that appropriate expertise and experience to ensure effective implementation may also reside in other parties. Accordingly, the ACHP commits to advancing consideration of burial sites, human remains, and funerary objects in the Section 106 process with its preservation partners through the following:

- A. Train ACHP staff regarding the implementation of this policy statement.
- B. Development of informational resources that address the NHPA, Section 106, and the following:
  - i. The Federal Indian Boarding School Initiative
  - ii. The intersection of NAGPRA
  - iii. Acquiring and managing sensitive information
  - iv. Climate change and burial sites, human remains, and funerary objects
  - v. Best practices in the treatment of marked and unmarked burial sites, human remains, and funerary objects.
- C. ACHP staff will seek opportunities to implement the policy principles into Section 106 agreement documents and program alternatives to advance consideration of burial sites, human remains, and funerary objects.
- D. The ACHP will advise federal agencies, Indian Tribes, Tribal and State Historic Preservation Officers, and NHOs in their development of historic preservation protocols for appropriate consideration of burial sites, human remains, and funerary objects.
- E. Encourage federal agencies and other relevant parties to give full and meaningful consideration to burial sites, human remains, and funerary objects consistent with this policy statement.

**Policy Review Period.** The ACHP commits to reviewing this policy statement approximately every five years from the date of its adoption to ensure its continued applicability. The ACHP executive director will seek input regarding the need to update this policy statement through appropriate ACHP committees, including Federal Agency Programs and Native American Affairs. Amendments shall be pursued when the executive director or ACHP members determine that such action is required and/or would significantly improve the policy statement. This policy statement shall be in effect until rescinded by ACHP members.

**Definitions.** The definitions provided below are meant to inform the application of this policy statement. However, terms such as burial site, intact, disturbance, and human remains, among others, often require the input of associated parties to more fully understand how to interpret or apply each term. The

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<sup>6</sup> Consistent with ACHP's [Guidance on Assistance to Consulting Parties in the Section 106 Review Process](#), when the federal agency (or in some cases the applicant) seeks the views and advice of any consulting party in fulfilling its legal obligation to consult with them, the agency or applicant is not required to pay that party for providing its views.

definitions provided below are intended to be inclusive and to advance the preservation and protection of burial sites, human remains, and funerary items, as appropriate.

- **Burial Site:** Any location, whether originally below, on, or above the surface of the earth, where human remains are or have been located.
- **Confidential:** Information that is protected by law, regulation, or federal policy. Preserving authorized restrictions on information access and disclosure, including means for protecting personal privacy and proprietary information
- **Consultation:** The process of seeking, discussing, and considering the views of other participants and, where feasible, seeking agreement with them. A foundational activity in the Section 106 review process.
- **Consulting parties:** Persons or groups the federal agency consults with during the Section 106 process. They may include the State Historic Preservation Officer; Tribal Historic Preservation Officer; Indian Tribes and Native Hawaiian organizations; representatives of local governments; applicants for federal assistance, permits, licenses, and other approvals; and/or any additional consulting parties.<sup>7</sup> Additional consulting parties may include individuals and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.<sup>8</sup>
- **Culturally sensitive:** Tangible and intangible property and knowledge which pertains to the distinct values, beliefs, and ways of living for a culture. It often includes property and knowledge that is not intended to be shared outside the community of origin or outside of specific groups within a community.<sup>9</sup>
- **Disturbance:** Disturbance of burial sites that are listed in or eligible for listing in the National Register of Historic Places likely would constitute an adverse effect under Section 106. An adverse effect occurs when "an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, setting, materials, workmanship, feeling, or association".<sup>10</sup> Determination of what constitutes a "disturbance" should be defined in consultation with proper deference provided to the views and opinions of descendant individuals and/or communities.
- **Funerary objects:** Objects that, as part of the death rite or ceremony of a culture, are reasonably believed to be associated with human remains.
- **Historic property:** Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. It includes artifacts, records, and remains that are related to and located within such properties, and it includes properties of traditional religious and cultural importance to an Indian Tribe or Native Hawaiian organization and that meet the National Register of Historic Places criteria.<sup>11</sup>
- **Human remains:** The physical remains of a human body including cremains, fragmented human remains, hair, and fluid, among other components. When human remains are believed to be comingled with other material (such as soil or faunal), the entire admixture should be treated as human remains.
- **Indian Tribe:** An Indian Tribe, band, nation, or other organized group or community, including a Native village, Regional Corporation or Village Corporation, as those terms are defined in Section 3 of the Alaska Native Claims Settlement Act<sup>12</sup>, which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.<sup>13</sup>
- **Indigenous Knowledge (IK):** Information provided by an Indian Tribe, Tribal member, Native Hawaiian, or other Indigenous person uniquely reflective of their knowledge, experience, understanding, or observation relating to cultural resources, practices, or actions. Indigenous Knowledge often constitutes sensitive information.

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<sup>7</sup> Based on 36 CFR § 800.2(c)

<sup>8</sup> 36 CFR § 800.2(c)(6)

<sup>9</sup> "[Native American Archival Materials](#)," (First Archivist Circle, 2007)

<sup>10</sup> 36 CFR § 800.5(a)(1)

<sup>11</sup> 36 CFR § 800.16(1)

<sup>12</sup> 43 U.S.C. § 1602

<sup>13</sup> 36 CFR § 800.16(m)

- **Native Hawaiian:** Any individual who is a descendant of the aboriginal people who, prior to 1778, occupied and exercised sovereignty in the area that now constitutes the state of Hawaii.<sup>14</sup>
- **Native Hawaiian organization (NHO):** Any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians.<sup>15</sup>
- **Preservation in place:** Taking active steps to avoid disturbing a burial site, human remains, or funerary objects including, to the maximum extent practical, any access, viewsheds, setting, and/or ongoing cultural activity that may be associated with the location.
- **Section 106:** That part of the NHPA which establishes a federal responsibility to take into account the effects of undertakings on historic properties and to provide the ACHP a reasonable opportunity to comment with regard to such action.
- **Sensitive:** Information that may be protected by law, regulation, or federal policy; information that may be identified as sensitive by the sponsoring entity/original source.
- **State Historic Preservation Officer (SHPO):** The official appointed to administer a state's historic preservation program.<sup>16</sup>
- **Tribal Historic Preservation Officer (THPO):** The official appointed or designated to administer the Tribe's historic preservation program.<sup>17</sup>
- **Treatment:** Measures developed and implemented to avoid, minimize, or mitigate adverse effects to historic properties.

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<sup>14</sup> 36 CFR § 800.16(s)(2)

<sup>15</sup> 36 CFR § 800.16(s)(1)

<sup>16</sup> 54 U.S.C. § 302301

<sup>17</sup> 54 U.S.C. § 302702

4.7 Protocol for Handling Discovery of Human Remains

	<u>Known Burials</u>	<u>Unidentified Burials</u>
<b>When to contact?</b>	<b>Intentional excavation</b> At the earliest time in decision-making process.	<b>Inadvertent Discovery</b> Upon discovery.
<b>Which Nation to contact?</b>	<p>If find is within existing Nation boundary, contact that Nation's Cultural Resource representatives.</p> <p>If the find is within the traditional land use area (fifty mile radius from the current nation territory, contact the closest Nation's Cultural Resource Representative.</p> <p>If the find is within the aboriginal territory of each nation, as shown on the attached map, contact the Nation within that territory. For finds located within fifty miles on either side of the boundary lines shown on the map, contact the Cultural Resource Representatives of both Nations.</p>	
<b>Who to contact?</b>	Haudenosaunee Cultural Resource Representatives  HSCBRR.	Haudenosaunee Cultural Resource Representatives  HSCBRR.
<b>How to contact?</b>	Contact list is provided.	
<b>Information Required</b>	<p>Brief description of the find or potential find; site map and any information on the known cultural history of the area and summary of nearby archaeological findings.</p> <p>Nation will send a representative to review the site.</p>	
<b>Next steps</b>	<p><i>Non-disturbance of burials is preferred.</i></p> <p>If after proper consultation, the remains must be removed, we prefer to have them reburied close to their original location as possible, provided the future sanctity of the grave can be assured. <i>No remains should be removed without proper cultural protocols.</i></p> <p>If no safe local burial ground can be offered, the Haudenosaunee will reclaim the remains for reburial at an undisclosed location. The local government /state agency/developer must pay all of the costs for such reburial.</p> <p>All objects associated with the original burial must be reburied as well. All of the soil in the immediate area of the burial should also be placed in the new grave.</p>	
<b>Time Frame</b>	30 to 45 days	As soon as possible

## **Attachment D**

**Cultural Resources Mitigation and Offset Plan**

# Cultural Resources Mitigation and Offset Plan – Revision 1

Hoffman Falls Wind Project

Towns of Fenner, Nelson, Smithfield, and Eaton, Madison County,  
New York

NYSHPO Project Review Number 21PR03978

ORES Matter Number 23-02976

REDACTED

Prepared for:



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April 2026

**MANAGEMENT SUMMARY**

NYSHPO Project Review Number: 21PR03978

ORES Matter Number: 23-02976

Involved State Agencies: New York State Office of Parks Recreation and Historic Preservation (Section 14.09); New York State Office of Renewable Energy Siting and Electric Transmission (ORES), Article VIII Application

Phase of Survey: Cultural Resources Mitigation and Offset Plan

Location Information: Towns of Fenner, Nelson, Smithfield, and Eaton, Madison County, New York

Facility Description: A proposed up to 109.8-megawatt (MW) wind-powered electric generating facility consisting of up to 18 Wind Turbine Generators (WTGs) and associated infrastructure.

Plan Overview: EDR (on behalf of the Permittee) conducted outreach with local historic preservation and municipal organizations to identify potential projects that would be appropriate for receipt of funding to mitigate (or offset) potential adverse effects on historic resources.

Report Authors: Kristen Olson

Date of Report: April 2026

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## 1.0 INTRODUCTION

### 1.1 Project Summary

On behalf of Hoffman Falls Wind LLC (the Permittee), a wholly owned subsidiary of Liberty Renewables Inc., Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) prepared this Cultural Resources Mitigation and Offset Plan (hereafter, the Plan) for the proposed Hoffman Falls Wind Project (or the Facility), located in the Towns of Fenner, Nelson, Smithfield, and Eaton in Madison County, New York. This Plan was prepared as part of ongoing review of the Facility under Article VIII of the New York State Public Service Law. The information and recommendations included in this Plan are intended to assist the Office of Renewable Energy Siting and Electric Transmission (ORES) and the New York State Office of Parks, Recreation and Historic Preservation (NYSHPO), and other New York state agencies in their review of the Facility under Article VIII of the New York State Public Service Law, Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law, as applicable.

The purpose of this Plan is to memorialize consultation undertaken to date by the Permittee regarding the Facility’s potential effect on historic resources, and to propose potential mitigation projects that would be implemented as part of the construction and operation of the Facility to offset potential adverse impacts. This Plan addresses the Facility’s potential effects on above-ground historic resources and measures to mitigate those effects.

The Facility’s potential effects on archaeological resources have been considered in separate reports that have been reviewed in consultation with NYSHPO, including Phase IB archaeological survey reports and addenda (EDR, 2023a, 2023b, 2024a, 2024b, 2025a) and a Phase II site examination work plan (EDR, 2025b). Consultation with the Oneida Indian Nation and Tuscarora Nation regarding potential archaeological impacts is ongoing. Archaeological reports and associated NYSHPO correspondence are not addressed further herein.

This Plan has been prepared by professionals who satisfy the Professional Qualifications Standards of the Secretary of the Interior’s Standards and Guidelines for Historic Preservation (36 CFR Part 61).

### 1.2 Agency Consultation

The Permittee has engaged in ongoing consultation with NYSHPO and ORES in order to evaluate the Facility’s potential effect on historic resources listed or eligible for listing in the State or National Register of Historic Places (S/NRHP). A *Historic Resources Survey Report* (EDR, 2024b) was prepared which included an inventory of historic resources within a five-mile-radius Historic Resources Study Area and Area of Potential Effect (APE) for Visual Effects. The historic resources survey inventoried 135 resources located within the Facility’s APE for Visual Effects and provided recommendations regarding their eligibility for listing in the S/NRHP. On February 8, 2024, NYSHPO provided determinations regarding S/NRHP eligibility for all resources surveyed and requested an analysis of potential visual impacts to the S/NRHP-listed Lorenzo State Historic Site and the S/NRHP-eligible Chittenango Falls State Park (NYSHPO, 2024a; Attachment A). EDR subsequently provided a *Visual Impact Assessment* (VIA) to NYSHPO (EDR, 2024c) which included analysis of potential visual impacts to historic resources.

In correspondence dated March 15, 2024, NYSHPO provided the following response regarding potential visual effects to historic resources within the APE for Visual Effects:

We have reviewed the submission received on February 16, 2024, including the submitted Exhibits 8 and 9. Based on that review, it appears that 128 historic resources eligible or listed in the State and National Registers of Historic Places have the potential to be impacted by the proposed undertaking. It is the OPRHP's opinion that the project, as described, will have an Adverse Impact on historic resources.

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 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 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 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). (NYSHPO, 2024b; Attachment A).

As part of ORES's review under Article VIII of the New York State Public Service Law and NYSHPO's review under Section 14.09 of the New York State Historic Preservation Law, and in response to NYSHPO's March 15, 2024, correspondence, EDR, on behalf of the Permittee, consulted with local stakeholders to identify appropriate and feasible mitigation projects within the Historic Resources Study Area, as described in Section 2.2 below.

## 2.0 HISTORIC RESOURCES MITIGATION

### 2.1 Mitigation of Visual Impacts to Historic Properties

Mitigation options relative to historic properties for wind projects are limited, given the nature of wind facilities and their siting criteria (very tall structures generally located at the highest locally available elevations). However, as described in the *VIA* for the Facility (EDR, 2024c), various mitigation measures were considered for the Facility. A full discussion of potential mitigation measures is included in the *VIA* (EDR, 2024c) and the *VIA Addendum* (EDR, forthcoming).

For previous renewable energy projects in New York State, NYSHPO has approved mitigation projects that provide benefits to municipalities, communities, and agencies with ownership or interest in historic properties located in areas where proposed projects may have a potential effect. Mitigation projects that have been proposed for previous renewable energy projects in New York State have included activities such as additional historic resources surveys, nominations of individual properties or districts to the S/NRHP, monetary contributions to historic property restoration causes, development of heritage tourism promotional materials, development of educational materials and lesson plans, and the development of organizational capacity for historic organizations, sites, and museums. The purpose of these types of mitigation projects is to offset potential visual impacts to historic properties resulting from the introduction of renewable energy infrastructure into their visual setting.

### 2.2 Stakeholder Outreach

As part of the Article VIII review process and in response to the March 15, 2024, letter from NYSHPO, EDR, on behalf of the Permittee, sought to identify potential mitigation projects located within areas where the Facility will be visible. In September 2025, EDR distributed outreach letters to local historical organizations, historians, municipal officials, and groups that have an interest in, or direct involvement in, the promotion of history in the municipalities where the Facility will be located or within the Facility viewshed. Outreach letters requested that stakeholders respond by indicating their interest in participation in the mitigation process. A sample outreach letter is included in Attachment B.

A total of 29 stakeholder organizations and municipalities were contacted as part of outreach efforts, including:

- Cazenovia Heritage
- Cazenovia Preservation Foundation
- Cazenovia Public Library
- Chenango Canal Association
- Daughters of the American Revolution, James Madison Chapter
- Erieville-Nelson Heritage Society
- Friends of the Old Town of Eaton Museum
- Fryer Memorial Museum
- Madison County Historian
- Madison County Historical Society
- Madison Hall Association
- Morrisville Public Library
- National Abolition Hall of Fame
- Nelson Preservation Associates
- Peterboro Area Historical Society
- Smithfield Community Association
- Stone Quarry Art Park
- Town of Cazenovia
- Town of Eaton
- Town of Fenner
- Town of Lincoln
- Town of Madison
- Town of Nelson
- Town of Smithfield
- Town of Stockbridge
- Town of Sullivan
- Village of Cazenovia
- Village of Morrisville
- Village of Munnsville

EDR, on behalf of the Permittee, engaged in stakeholder outreach via email and telephone between September 11, 2025, and January 21, 2026. Responses from stakeholders who expressed interest in participating in the mitigation plan development process are summarized below; additional detail is provided in Attachment C.

- **Cazenovia Heritage** – Communication with Cazenovia Heritage President **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** was initiated by letter sent via email on September 11, 2025. President **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** replied via email on the same day expressing interest in participating in the mitigation plan process. EDR continued email and telephone correspondence with Ms. Ferguson and discussed potential mitigation projects.
- **Cazenovia Preservation Foundation** – Communication with Cazenovia Preservation Foundation Executive Director **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** was initiated via a teleconference hosted by Madison County Historian Matthew Urtz on October 30, 2025. EDR continued communication with **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** via email; however, to date, the Cazenovia Preservation Foundation has not proposed a mitigation project.
- **Chenango Canal Association** – Communication with Chenango Canal Association **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** was initiated via email on September 11, 2025, in her capacity as Town of Madison Historian. **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** replied via telephone on November 18, 2025, identifying a potential mitigation project related to the

section of the Chenango Canal in the hamlet of Bouckville. Additional details regarding this proposed mitigation project are discussed in Section 2.3.

- **Daughters of the American Revolution, James Madison Chapter** – Communication with the Daughters of the American Revolution, James Madison Chapter, was initiated by chapter Vice-Regent **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** via email on November 28, 2025. **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** proposed several possible cemetery maintenance, documentation, and interpretation activities. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Erieville-Nelson Heritage Society** – Communication with the Erie-Nelsonville Heritage Society (ENHS) was initiated by email on September 11, 2025. ENHS member **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** noted in a telephone call on November 17, 2025, that the organization would be interested in proposing a mitigation project to support the publication of its newsletter. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Friends of the Old Town of Eaton Museum** – Communication with Friends of the Old Town of Eaton Museum President **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** was initiated by letter sent via email on September 11, 2025. **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** responded on December 1, 2025, and proposed a mitigation project to support the museum’s collections management. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Madison County Historian** – Communication with Madison County Historian **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** was initiated by email on September 11, 2025. **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** responded on September 15, 2025, expressing an interest in participating. On October 30, **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** hosted a videoconference for historians and others during which EDR summarized the CRMOP process and fielded attendees' questions. EDR continued to correspond with **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION**, who provided additional organization contacts. In an email on December 4, 2025, **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] >**END CONFIDENTIAL INFORMATION** indicated that his office would not be proposing a mitigation project.
- **National Abolition Hall of Fame and Museum** – Communication with the National Abolition Hall of Fame and Museum was initiated by letter sent via email on September 11, 2025. The National Abolition Hall of Fame and Museum is operated by the Smithfield Community Association; see below for further correspondence with this organization.

- **Nelson Preservation Associates** – Communication with Nelson Preservation Associates (NPA) was initiated by letter sent via email on September 11, 2025. NPA Volunteer Grants Writer **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** replied via email on November 19, 2025, proposing a mitigation project supporting up to three areas of repair and rehabilitation of the Old Drovers Tavern in the Hamlet of Nelson. Additional details regarding these proposed mitigation projects are discussed in Section 2.3.
- **Peterboro Area Historical Society** – Communication with the Peterboro Area Historical Society was initiated by letter sent via email on September 11, 2025, to Smithfield Town Historian **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**. **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** and EDR continued to correspond via email and telephone to discuss a potential climate control and collections storage project for the Peterboro Area Museum. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Smithfield Community Association** – Communication with the Smithfield Community Association was initiated by letter sent via email on September 11, 2025. SCA President and Town of Smithfield Deputy Supervisor **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** corresponded with EDR via telephone and email, ultimately proposing a mitigation project on behalf of the Towns of Eaton, Fenner, Nelson, and Smithfield. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Stone Quarry Art Park** – Communication with Stone Quarry Art Park (SQAP) was initiated by letter sent via email on September 11, 2025. CEO **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** replied on September 16, 2025, and continued to correspond with EDR via email. SQAP proposed a mitigation project supporting digitization of and public access to their archival holdings. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Town of Cazenovia** - Communication with the Town of Cazenovia was initiated by letter sent via email on September 11, 2025. Town of Cazenovia Supervisor **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** confirmed the Town’s interest in participating via a letter sent on October 2, 2025. On December 15, the Cazenovia Area Community Development Association (CACDA) proposed two mitigation projects on behalf of the Town. Additional details regarding these proposed mitigation projects are discussed in Section 2.3.
- **Town of Eaton** - Communication with the Town of Eaton was initiated by letter sent via email on September 11, 2025. Town of Eaton Supervisor **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** discussed potential mitigation projects with EDR via telephone on September 26, 2025. On December 17, 2025, the Towns of Eaton, Fenner, Nelson, and Smithfield jointly proposed a mitigation project providing support for rehabilitation and repairs to historic buildings and cemeteries within the four municipalities. Additional details regarding this proposed mitigation project are discussed in Section 2.3.

- **Town of Fenner** - Communication with the Town of Fenner was initiated by letter sent via email on September 11, 2025, and by a follow-up email sent September 25, 2025. EDR subsequently communicated by telephone with Town Clerk **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**. On December 17, 2025, the Towns of Eaton, Fenner, Nelson, and Smithfield jointly proposed a mitigation project providing support for rehabilitation and repairs to historic buildings and cemeteries within the four municipalities. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Town of Madison** - Communication with the Town of Madison was initiated by letter sent via email on September 11, 2025. Town of Madison Historian **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** replied via email on November 17. EDR continued email and telephone correspondence with **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** and discussed a potential mitigation project to support maintenance of a historic cemetery. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Town of Nelson** – Communication with the Town of Nelson was initiated by letter sent via email on September 11, 2025. **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**, Co-Historian for the Town, attended the teleconference hosted by Madison County Historian **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** on October 30, 2025, and continued correspondence with EDR via email and telephone. On December 9, 2025, Lauren Lines of CACDA submitted a mitigation project proposal on behalf of the Town of Nelson. On December 17, 2025, the Towns of Eaton, Fenner, Nelson, and Smithfield jointly proposed a mitigation project providing support for rehabilitation and repairs to historic buildings and cemeteries within the four municipalities. Additional details regarding this proposed mitigation project are discussed in Section 2.3.
- **Town of Smithfield** - Communication with the Town of Smithfield was initiated by letter sent via email on September 11, 2025. Town Historian **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** responded on September 17, expressing concern about the Facility’s potential impacts. EDR continued to correspond with **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** and Town Supervisor **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** via email. On December 17, 2025, the Towns of Eaton, Fenner, Nelson, and Smithfield jointly proposed a mitigation project providing support for rehabilitation and repairs to historic buildings and cemeteries within the four municipalities. Additional details regarding this proposed mitigation project are discussed in Section 2.3.

Responses from the remaining stakeholders are summarized below.

- **Cazenovia Public Library** – Communication with Cazenovia Public Library Acting Director **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** was initiated via a teleconference hosted by Madison County Historian **BEGIN CONFIDENTIAL**

**INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** on October 30, 2025. To date, there has been no further communication from the Cazenovia Public Library.

- **Fryer Memorial Museum** – Communication with the Fryer Memorial Museum was initiated by letters sent via email on September 11, 2025, and by a follow-up email sent September 25, 2025. To date, there has been no response from the museum.
- **Madison County Historical Society** – Communication with the Madison County Historical Society was initiated by letter sent via email on September 11, 2025, and by a follow-up email sent November 7, 2025. To date, there has been no response from the historical society.
- **Madison Hall Association** – Communication with the Madison County Historical Society was initiated by letter sent via email on September 11, 2025, and by a follow-up email sent November 7, 2025. To date, there has been no response from the association.
- **Morrisville Public Library** – Communication with the Morrisville Public Library was initiated by letter sent via email on September 11, 2025, and by a follow-up email sent November 13, 2025. To date, there has been no response from the library.
- **Town of Lincoln** – Communication with the Town of Lincoln was initiated by letter sent via email on September 11, 2025. EDR spoke with Town Historian David Sadler on October 6, 2025. To date, there has been no further communication from the Town of Lincoln.
- **Town of Stockbridge** – Communication with the Town of Stockbridge was initiated by letter sent via email on September 11, 2025, and by a follow-up email sent September 25, 2025. To date, there has been no response from the Town of Stockbridge.
- **Town of Sullivan** – Communication with the Town of Sullivan was initiated by letter sent via email on September 11, 2025. EDR spoke with Town Historian **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** on October 6, 2025. To date, there has been no further communication from the Town of Sullivan.
- **Village of Cazenovia** – Communication with the Village of Cazenovia was initiated by letter sent via email on September 11, 2025, and by a follow-up email sent November 1, 2025. To date, there has been no response from the Village of Cazenovia.
- **Village of Morrisville** – Communication with the Village of Morrisville was initiated by letter sent via email on September 11, 2025. To date, there has been no response from the Village of Morrisville.
- **Village of Munnsville** – Communication with the Village of Munnsville was initiated by letter sent via email on September 11, 2025, and by a follow-up email sent November 1, 2025. Town Clerk **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**

replied via email on November 16, 2025, suggesting EDR contact the Fryer Memorial Museum. To date, there has been no further response from the Village of Munnsville.

Attempts to reach other individuals or organizations listed above were ultimately not successful; these individuals did not respond to outreach or indicated they were not interested in participating in the mitigation plan process. See Attachment C for a full summary of all correspondence with stakeholders.

## **2.3 Potential Mitigation Projects**

For those stakeholders who indicated interest in pursuing offset funding, outreach continued through December 19, 2025, via email and telephone, to obtain more detailed information about potential mitigation projects that would enhance the knowledge or condition of local historic resources. EDR informed stakeholders that work performed would need to be conducted in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, as applicable. Correspondence between EDR and interested stakeholders resulted in the identification of the potential historic resources mitigation projects described in detail below. Project-related mitigation correspondence and cost estimates are included in Attachment D.

### *2.3.1 Chenango Canal – Improved Access and Signage*

The Chenango Canal Association (CCA) is a volunteer nonprofit organization that promotes research, preservation, and public appreciation of the former Chenango Canal, which passes through the Hamlet of Bouckville in the Town of Madison within the Historic Resources Study Area for the Facility. The CCA operates a Cottage Museum located at the intersection of Canal Road and State Route 26 in Bouckville and maintains a five-mile Towpath Trail that connects to the Village of Hamilton to the south. The CCA has an agreement with the New York State Canal Corporation that enables the organization to provide public access to the canal. There are three outdoor staircases that provide access between the Cottage Museum and the Towpath Trail in the Hamlet of Bouckville which were constructed in 1992, are not code-compliant, and are in need of replacement. In addition, a pair of signs at the Cottage Museum that were installed in 2004 are weathered and in need of replacement. The CCA also proposes to replace the small paver block patio that is located beneath the signs.



Figure 1. Deteriorated exterior stairs at the Cottage Museum (top) and Towpath Trail (bottom)  
(Photographs by CCA).

The CCA has estimates the cost of the stair replacement to be \$25,000 (based on a cost estimate from a contractor) and estimates the cost of signage and patio replacement to be \$1,210 (based in part on a cost estimate from a sign fabricator).

EDR recommends the allocation of \$9,000 total towards the repair of exterior stairs and/or replacement of signage and/or replacement of the paver block patio by the Chenango Canal Association.

### 2.3.2 *Daughters of the American Revolution, James Madison Chapter – Cemetery Documentation, Maintenance, and Interpretation*

The Daughters of the American Revolution, James Madison Chapter (DAR) has worked in recent years to identify Revolutionary War soldiers buried in historic cemeteries in Madison and Chenango counties and has contracted with gravestone repair specialists to clean and repair veterans' headstones. The DAR proposes to utilize mitigation funding to support the documentation, maintenance, and interpretation of historic cemeteries within the Facility's Historic Resources Study Area, including:

- Identification of burials and documentation of veteran status through genealogical research;
- Placement of military grave markers where appropriate and purchase of flags to be placed for Memorial Day observations;
- Cleaning, restoration, and re-setting of damaged grave markers;

- Mapping of cemeteries and burial locations to be published in support of genealogical and historic research, including the potential development of a digital mapping application;
- Design, manufacture, and installation of signage identifying cemeteries and directing visitors to sources of additional information; and/or
- Collaboration with Madison County Tourism to develop a historic cemetery “trail”.

Cost estimates for these activities and programs are not available at this time. EDR recommends the allocation of \$5,000 total towards one or more of the above-described cemetery documentation, maintenance, and interpretation activities.

### 2.3.3 *Erieville-Nelson Heritage Society – Newsletter Publication Support*

The Erieville-Nelson Heritage Society (ENHS) was established in 1984 with the objective of collecting and preserving historical records and other information relating to the Erieville and Nelson communities. The Hamlets of Nelson and Erieville are both located within the Town of Nelson and are within or partially within the Historic Resources Study Area and APE for Visual Effects for the Facility. Since 2017, ENHS has published *Hills and Hollows*, a 12-page triannual print newsletter, which is supported by advertising sales and membership dues, but notes that postage and printing costs have increased. The organization proposes mitigation funding to publish all existing volumes of the newsletter in book format to celebrate its 10<sup>th</sup> anniversary and to make copies of the book available at no cost to area libraries, historical societies, and schools. This project would include:

- Printing 250 copies of a *Hills and Hollows* 10<sup>th</sup> anniversary book, estimated at \$9,901.45;
- Mailing 100 copies of the book to local repositories, estimated at \$522; and
- Approximately 700 mailings of the *Hills and Hollows* periodical, representing about one year’s periodical mailing costs, estimated at \$749.

EDR recommends the allocation of \$5,000 total towards the publishing and postage costs of the Erieville-Nelson Heritage Society’s newsletter and 10<sup>th</sup> anniversary book compilation.



Figure 2. The September 2025 issue of Hills and Hollows (Provided by ENHS).

### 2.3.4 Friends of the Old Town of Eaton Museum – Archives Project

The Old Town of Eaton Museum is a private museum located in the historic stone Greek Revival residence at 2776 River Road in the Town of Eaton, which is reported to be the oldest limestone building in the municipality. The museum is supported by the nonprofit organization, Friends of the Old Town of Eaton Museum. The museum’s collection includes books, surveys, lithographs, tax records, military rolls, church records, and other archival materials. The museum is planning a celebration in May 2026 that is expected to result in an influx of donated materials that will require appropriate storage. In addition, the museum is undertaking a project to improve collections storage and digitize selected items to make available online. The work will be undertaken by volunteers and the museum has identified the following supply needs as part of this project:

- Display shelving with glass doors, estimated at \$200 per unit;
- Open wire shelving, estimated at \$85 per unit;
- Polypropylene document sleeves, estimated at \$45 per box of 75;
- Gaylord Archival 35mm slide preservation boxes, estimated at \$25 each; and
- Gaylord Archival lidded boxes, estimated at \$30 each.



Figure 3. The Old Town of Eaton Museum, 2776 River Road, exterior (left) and interior (right)  
(Photographs courtesy of Old Town of Eaton Museum).

The Friends of the Old Town of Eaton Museum has estimated a total project cost of \$6,500. EDR recommends the allocation of \$1,500 to be made available to the Friends of the Old Town of Eaton Museum for purchase of the supplies described above.

### 2.3.5 *Nelson Preservation Associates – Old Drovers Tavern Repair and Restoration*

Nelson Preservation Associates (NPA) is a nonprofit organization formed in 2019 to revitalize the area known as Nelson Corners located at the intersection of U.S. Route 20 and Nelson Road/Erieville Road in the Town of Nelson. Since then, the organization has undertaken significant restoration and rehabilitation work to the S/NRHP-eligible Old Drovers Tavern<sup>1</sup>, a two-story wood frame building constructed ca. 1804 on the Cherry Valley Turnpike (U.S. Route 20). NPA has acquired ownership of the building and intends to open it to the public as a gathering space and food/drink establishment.

NPA has identified three areas of repair and restoration needed for the Old Drovers Tavern:

- Furnace Chimney Repairs – The ceramic liner of the chimney venting the building’s furnace is not code compliant and is in need of replacement. Cost estimates provided by a local service provider for this work range from \$3,800 for a new clay lining to \$4,600 for a stainless-steel liner.
- Drainage Mitigation – As a result of grade changes due to road improvements, the ground to the south of the building slopes down towards its foundation. In July 2024, a speeding car crashed into the west side of the building, revealing sill rot and masonry damage from water penetration. NPA plans to address this condition by installing inground drainage lines between the southwest corner of the property and a drainage swale at the northwest end of the property. The cost of materials, excavation, regrading, with consideration of in-kind contribution of professional labor and equipment usage, are estimated at \$5,600. The south sill plate has extensive rot, exacerbated by the presence of a concrete slab walkway installed against the south elevation of the building in the

<sup>1</sup> Old Drover’s Tavern, also known as Sickle and Sheath Drover’s Tavern and James Store, is represented by two USNs in the NYSHPO’s Cultural Resource Information System (CRIS) database: **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION.**

1920s or 1930s. Cost estimates for replacing the sill range from \$29,000 to \$35,000. Removal of and disposal of the concrete walkway, necessary for accessing the sill plate and preventing future water infiltration, is estimated at \$1,350.

- Interior Storm Windows – Old Drovers Tavern has a variety of historic wood sash windows, which the NPA plans to gradually restore. The first priority of this long-term restoration plan is to improve the energy efficiency of the first-floor windows (including a group of three double-hung sash windows and five large multi-light retail display windows) by installing custom interior pressure fitting storm windows. The total cost for these interior storm windows is \$7,640.



Figure 4. Historic (left) and current (right) views of Old Drover's Tavern  
(Photographs courtesy of Nelson Preservation Associates).

EDR recommends the allocation of \$12,000 to be made available to Nelson Preservation Associates for any or all of the repair and restoration activities described above.

### 2.3.6 Stone Quarry Art Park

Stone Quarry Art Park (SQAP) is a nonprofit arts organization with a 100-acre outdoor art space that includes Hilltop House **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION**, the S/NRHP-listed home and studio of artist Dorothy Riester (1916-2017). In 2021, the organization developed a digital catalog using the CollectiveAccess platform in order to digitize the Riester archive and document all current and past outdoor artworks. SQAP has been working with students in a Museum Studies class at Syracuse University (SU) to complete the work but does not have any staff dedicated to the project, and the SU class is not offered every semester. SQAP proposes to utilize mitigation funding to continue this work and make the digitized materials available to the public on its website. This project would include:

- Compensation for dedicated staff hours to digitize the collection, estimated at \$7,500 for 300 hours of work;
- Development of a "front end" public facing digital catalog to be integrated with the SQAP website by CollectiveAccess developer Whirl-i-gig, estimated at \$5,000; and
- Project administration and supervision by the SQAP CEO and Artistic Director, estimated at \$2,500.



**Figure 5. Stone Quarry Art Park**  
 (Photograph by Laura Reeder, provided by SQAP).

EDR recommends the allocation of \$5,000 to be made available to SQAP for the continued digitization of the Dorothy Riester archive and documentation of current and past artworks.

### *2.3.7 Town of Cazenovia – South Cemetery Repairs and New Woodstock Heritage Park Signage*

The Town of Cazenovia maintains South Cemetery, a historic cemetery located within the Historic Resources Study Area but outside the APE for Visual Effects at 4006 Number Nine Road. The cemetery was established in the early nineteenth century and contains over 600 known burials dating from about 1803 to 2025. The Cazenovia Area Community Development Association (CACDA), on behalf of the Town, has identified repairs to the cemetery’s three pairs of brick and stone entry pillars and removal of diseased maple trees along the road frontage as priority maintenance items. The total cost of this work is estimated at \$56,075.

The Town of Cazenovia also maintains New Woodstock Heritage Park, a small public park located in the center of the Hamlet of New Woodstock, which is approximately 2.3 miles southwest of the Historic Resources Study Area. CACDA, on behalf of the Town, proposes upgrading the existing sign within the park that interprets the history of the 1818 New Woodstock Hotel which stood on the site but was demolished in the 1970s. This work would include building a raised planter, new structural frame, and roof for the existing sign. The total cost of this work is estimated at \$5,500.

Due to New Woodstock’s distance from the Historic Resources Study Area, EDR proposed mitigation funding be limited to repair and maintenance work at South Cemetery. EDR recommends the allocation of \$5,000 to be made available to the Town of Cazenovia for this project.



Figure 6. South Cemetery brick and stone entrance pillars  
(Photographs provided by CACDA).

### 2.3.8 *Towns of Eaton, Fenner, Nelson, and Smithfield – Historic Building Rehabilitation and Cemetery Maintenance and Interpretation*

The Towns of Eaton, Fenner, Nelson, and Smithfield are the four municipalities where the proposed wind turbines and associated Facility infrastructure will be located. On December 9, 2025, Lauren Lines of the Cazenovia Area Community Development Association (CACDA) proposed a mitigation project involving the cleaning and re-installation of seven grave markers at Erieville Reservoir/Tuscarora/Temple Cemetery. On December 2 and 3, 2025, the Peterboro Area Historical Society (PAHS), which operates the Peterboro Area Museum (USN 05313.000049) at 4608 Peterboro Road in the Town of Smithfield, discussed a potential climate control, ceiling repair, and foundation repair project with EDR via telephone. The museum building is owned by the Town of Smithfield.

On December 17, 2025, Smithfield Community Association President and Town of Smithfield Deputy Supervisor **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** submitted a joint mitigation project proposal on behalf of the Towns of Eaton, Fenner, Nelson, and Smithfield. The proposed project includes creation of a historic building fund and a cemetery stabilization and restoration fund.

The historic building fund would provide financial support for the maintenance, restoration, and/or rehabilitation of historic buildings in the four towns that are owned by municipalities or nonprofit organizations. Potential work may include but is not limited to:

- Repair of historic windows or installation of appropriate replacement sash;
- Installation of storm windows;
- Installation of climate control systems;
- Addition of fire/smoke notification systems;
- Exterior envelope maintenance, such as siding repair, in-kind replacement, painting, and weatherization; and
- Foundation repointing and repair.



**Figure 7. The Gerrit Smith Estate National Historic Landmark (97NR01148) is located in the hamlet of Peterboro in the Town of Smithfield and is operated by the nonprofit Smithfield Community Association (Photograph by EDR).**

The cemetery stabilization and restoration fund would support work to historic cemeteries within the four towns such as gravestone cleaning, repair, and re-setting; fence repair; vegetation removal; signage installation; and documentation. The four towns have identified the following cemeteries to be included in the project:

- Town of Eaton
  - Leland's/Pinewoods Cemetery
  - Old West Eaton/Tayntor Cemetery
- Town of Fenner
  - Ballou Cemetery
  - Gamlin Cemetery
  - Munger Cemetery

- Needham Cemetery
- Wilson Cemetery
- Lyon/Wyss Cemetery
- Perryville Cemetery
- Town of Nelson
  - Bliss Cemetery
  - Payne Cemetery
  - Erieville Reservoir/Tuscarora/Temple Cemetery
- Town of Smithfield
  - Former Baptist/Old Peterboro Cemetery
  - Peterboro Cemetery



**Figure 8. Pinewoods Cemetery (USN 05304.000058), Town of Eaton**  
(Photograph by EDR).

The Towns of Eaton, Fenner, Nelson, and Smithfield proposed a total project funding amount of \$250,000. This total cost is based in part on the cost of previous restoration work by Riegel Restorations at the Former Baptist/Old Peterboro Cemetery and on project quotes the municipalities have received for building repair and rehabilitation work. EDR recommends the allocation of \$80,000 to be made available to the Towns of Eaton, Fenner, Nelson, and Smithfield for the maintenance, repair, rehabilitation, and interpretation of historic buildings and cemeteries.

2.3.9 *Town of Madison – Indian Opening Cemetery Maintenance*

Indian Opening Cemetery, which is owned and managed by the Town of Madison, is located approximately one half mile east of the Historic Resources Study Area. A portion of the Town of Madison is located within the Historic Resources Study Area and APE for Visual Effects. The cemetery is an approximately 1.3-acre burial ground established ca. 1805 and in use until the 1920s. Town Historian **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** has identified the cemetery as a location for an event recognizing the 250<sup>th</sup> anniversary of the American Revolution due to the presence of nine Revolutionary War veteran burials. Although it was not surveyed for the Facility due to its location outside of the Historic Resources Study Area, Indian Opening Cemetery appears to meet S/NRHP Criterion A for its association with the early development of the Town of Madison and Criterion C for its collection of funerary art representing the nineteenth and early twentieth centuries.

The Town of Madison has identified the following maintenance needs for Indian Opening Cemetery:

- Cleaning, repair, and resetting of grave markers;
- Trimming or removal of trees in order to restore a cemetery’s historic appearance or prevent or limit damage to grave markers; and
- Groundhog eradication.

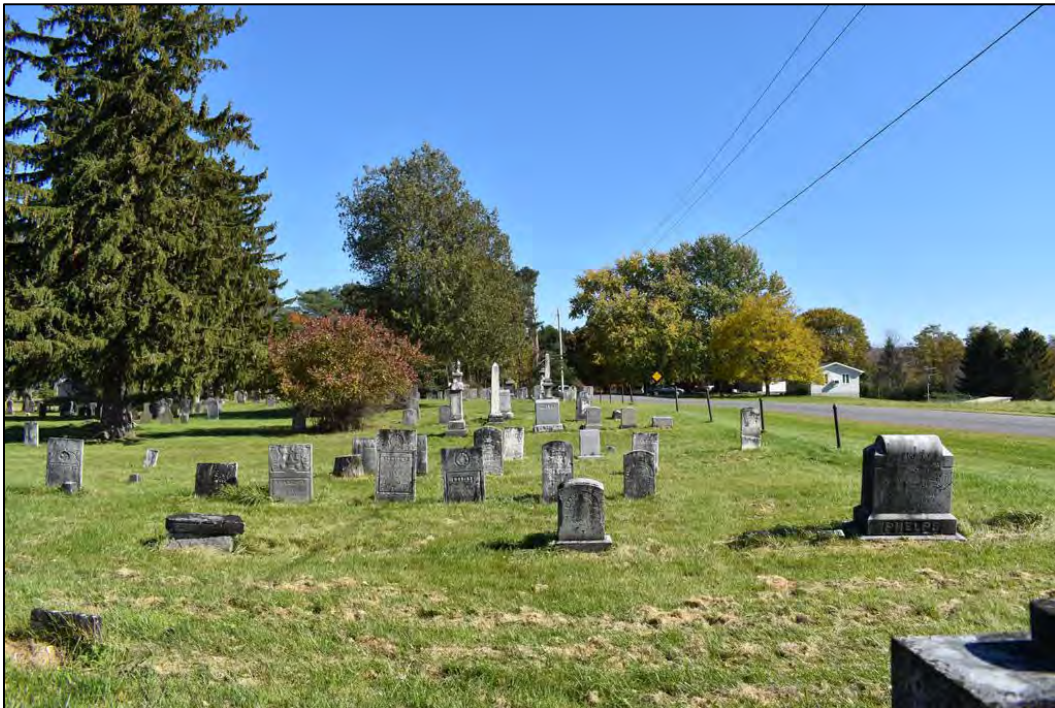


Figure 9. Indian Opening Cemetery, Town of Madison  
(Find A Grave, 2025).

The Town of Madison estimates a total project cost of \$20,000 to include repair of up to 50 headstones, tree removal, and groundhog eradication. EDR recommends the allocation of \$5,000 to be made available to the Town of Madison for this project.

## 2.4 Offset Funding

Based on consultation with the stakeholders summarized herein, the proposed amount of offset funding for the Hoffman Falls Wind Project is anticipated to total \$119,500. This amount would be divided amongst the 10 mitigation projects identified through consultation with stakeholders and recommended by EDR to receive funding, as described in Section 2.3. The total amount proposed is subject to review by the Permittee, NYSHPO, and ORES. The projects proposed for offset mitigation funding are appropriate due to their high potential for public benefit. To the extent practicable, given the number, type, and geographic distribution of projects that were proposed by stakeholders, EDR has recommended larger amounts of funding for projects in the municipalities that are anticipated to have the greatest visual impact from the Facility. Where the amount of recommended funding is less than the amount of funding requested by a stakeholder, EDR believes that the recommended funding is sufficient to accomplish a meaningful portion of the total project scope and/or a discrete project phase or work item that is part of a larger planned project.

Offset funds would help with promotion of local and regional heritage, access to historic resources including repairs to existing historic resources, public interpretation of local history, and the care and display of local history collections. A list of proposed mitigation projects and their estimated costs are presented in matrix form in Table 1 and their locations are mapped on Figure 12.

## 2.5 Mitigation Project Management

Following approval by NYSHPO of the Cultural Resources Mitigation and Offset Plan, the Permittee will provide cultural resources mitigation support as part of the execution of the plan, to include the following stipulations:

- Any necessary changes to the approved mitigation projects will be summarized and submitted to NYSHPO via NYSHPO’s online Cultural Resource Information System (CRIS)<sup>2</sup> using the existing Hoffman Falls Wind Project NYSHPO project number (21PR03978) and to ORES.
- For mitigation projects where consultation with NYSHPO is warranted, a new CRIS project will be initiated, and project titles will include a reference to the Hoffman Falls Wind Project (21 PR03978).
- The Permittee will refer stakeholders to the submission guidance available in the CRIS Online Help System (NYSHPO, 2025). Any further changes or updates to mitigation projects, as well as reporting on expenditures and work performed, will be submitted to NYSHPO via CRIS, and to ORES.

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<sup>2</sup> Available at: <https://cris.parks.ny.gov/>.

- The Permittee and/or their consultants will continue to correspond with stakeholders to facilitate payment and the completion of the approved mitigation projects. Payment to stakeholders will be issued at the start of Facility construction. All mitigation activities are anticipated to be completed within two years of the start of construction of the Facility.
- Stakeholders will be requested to provide project progress updates to the Permittee as necessary. Progress reports will be provided to NYSHPO and ORES on an annual basis, at a minimum, following the start of Facility construction and payment being issued to stakeholders. Stakeholders will be requested to provide receipts, estimates, photographs of completed work, and other relevant documentation of mitigation project progress for inclusion in the progress reports.
- Following the completion of mitigation activities, the Permittee will prepare a final letter summarizing the completed mitigation projects for submission to NYSHPO and ORES to demonstrate compliance with the conditions of the plan.

Table 1. Mitigation Project Funding Matrix and Project Cost Estimates

Stakeholder	Project Name	Description	BEGIN CONFIDENTIAL INFORMATION <	Total Cost Estimate	Proposed Mitigation Funding	Comments
Chenango Canal Association	Improved Visitor Access and Signage	This project involves replacement of exterior stairs that provide public access to the Chenango Canal Towpath Trail (\$25,000) and replacement of signage and a paver block patio at the Cottage Museum (\$1,210).	[REDACTED]	\$26,210	\$9,000	Cost estimate provided by R&B Innovative Construction for stair replacement and the Chenango Canal Association and Terry Signs for the replacement of signage and block patio
Daughters of the American Revolution, James Madison Chapter	Cemetery Interpretation, Documentation, and Maintenance	This project involves identification and documentation of burials, mapping, cleaning and repair of grave markers, identifying signage, and/or creation of a tourism “trail” interpreting Madison County cemeteries.	[REDACTED]	N/A	\$5,000	Cost estimates for specific activities are not available at this time.
Erieville-Nelson Heritage Society	Newsletter and Book Publication Support	This project involves funding for one year of mailing costs for the ENHS newsletter (\$749) and publication and mailing costs for the 10 <sup>th</sup> anniversary compilation book (\$10,423.25).	[REDACTED]	\$11,172.45	\$5,000	Cost estimates were provided by ENHS and based on a quote from a local printer as well as current USPS postal rates.
Friends of the Old Town of Eaton Museum	Archives Project	This project involves improvements to collections storage and digitization of selected items to make available online.	[REDACTED] >END CONFIDENTIAL INFORMATION	\$6,500	\$1,500	Cost estimate provided by the Friends of the Old Town of Eaton Museum.

Stakeholder	Project Name	Description	<p style="text-align: center;"><b>BEGIN CONFIDENTIAL INFORMATION &lt;</b></p>	Total Cost Estimate	Proposed Mitigation Funding	Comments
Nelson Preservation Associates	Repairs and Restoration of Old Drovers Tavern	This project involves furnace chimney repairs (\$3,800-\$4,600), site drainage improvements and timber sill plate replacement (\$35,950-\$41,950), and/or the installation of custom interior storm windows (\$7,640).	<p style="text-align: center;"><b>CONFIDENTIAL</b></p>	Up to \$54,190	\$12,000	The total cost estimate was provided by Nelson Preservation Associates.
Stone Quarry Art Park	Archive Digitization	This project involves the digitization of the Dorothy Riester archive and documentation of current and past outdoor artworks.	<p style="text-align: center;"><b>CONFIDENTIAL</b></p>	\$15,000	\$5,000	The total cost estimate was provided by SQAP.
Town of Cazenovia	South Cemetery Repairs and Maintenance	This project involves repairs and maintenance to a historic cemetery, including brick and stone pillar repair and tree pruning, removal, and/or replanting.	<p style="text-align: center;"><b>CONFIDENTIAL</b></p>	\$56,075	\$5,000	The total cost estimate was based in part on a quote from a tree care company, which ranged from \$18,875 to \$23,200 for tree pruning, removal, and/or replanting.
Towns of Eaton, Fenner, Nelson, and Smithfield	Historic Building Rehabilitation; Cemetery Maintenance and Interpretation	This project involves maintenance and rehabilitation of historic buildings and/or maintenance and interpretation of historic cemeteries within the Towns of Eaton, Fenner, Nelson, and Smithfield.	<p style="text-align: center;"><b>CONFIDENTIAL</b></p> <p style="text-align: right;"><b>END CONFIDENTIAL INFORMATION</b></p>	\$250,000	\$72,000	The total cost estimate is based on previous quotes received by the four municipalities for building repair and rehabilitation work, as well as the cost of previous cemetery repair work by Riedel Restorations.

Stakeholder	Project Name	Description	<p><b>BEGIN CONFIDENTIAL INFORMATION &lt;</b> [REDACTED]</p>	Total Cost Estimate	Proposed Mitigation Funding	Comments
Town of Madison	Cemetery Maintenance	This project involves the cleaning, repair, and/or resetting of grave markers as well as groundhog eradication and tree removal in Indian Opening Cemetery.	<p>[REDACTED]</p> <p><b>END CONFIDENTIAL INFORMATION</b></p>	\$20,000	\$5,000	<p>The total cost estimate prepared by <b>BEGIN CONFIDENTIAL INFORMATION &lt;</b> [REDACTED] <b>&gt;END CONFIDENTIAL INFORMATION</b> is based on discussions with a gravestone restoration service provider.</p>

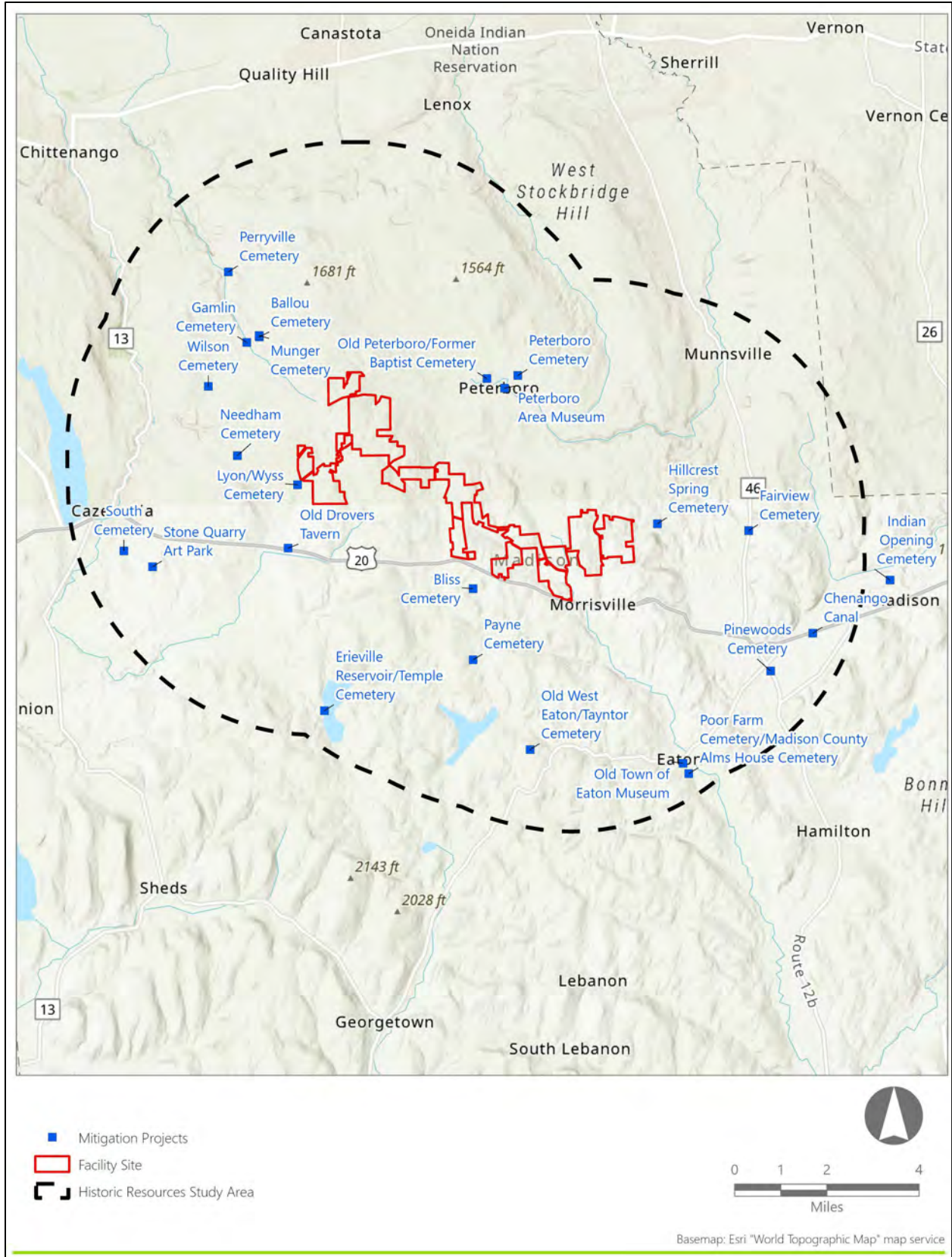


Figure 10. Proposed Mitigation Project Locations

### 3.0 SUMMARY

#### 3.1 Summary of Proposed Historic Resources Mitigation

On behalf of the Permittee, EDR prepared this summary of potential historic resources mitigation projects that could be undertaken to offset the Facility’s impacts on historic properties.

EDR conducted outreach to local municipalities and historical organizations, identified the following potential historical resources mitigation projects, and is proposing the following funding to support these projects:

- The Chenango Canal Association proposes two mitigation projects: the replacement of stairs providing access to the Cottage Museum and Towpath Trail and the replacement of signage and a paver block patio at the museum. EDR recommends the allocation of \$9,000 towards either or both of these projects.
- The Daughters of the American Revolution, James Madison Chapter proposes a mitigation project to potentially include documentation, placement of military grave markers, repairs to grave markers, installation of signage at historic cemeteries, and creation of a historic cemetery “trail” in collaboration with Madison County Tourism. EDR recommends the allocation of \$5,000 towards this project.
- The Erieville-Nelson Heritage Society proposes a mitigation project to support the costs of publication and mailing of a 10<sup>th</sup> anniversary compiled book containing past issues of the *Hills and Hollows* triannual newsletter and one year’s periodical mailing costs. EDR recommends the allocation of \$5,000 towards this project.
- The Friends of the Old Town of Eaton Museum proposes a mitigation project to support the storage and care of the museum’s collections through the purchase of shelving and archival storage supplies. EDR recommends the allocation of \$1,500 towards this project.
- Nelson Preservation Associates proposes three mitigation projects as part of the ongoing rehabilitation of the historic Old Drovers Tavern: furnace chimney repairs, drainage mitigation, and interior storm windows. EDR recommends the allocation of \$12,000 towards any or all of these projects.
- Stone Quarry Art Park proposes a mitigation project to support the digitization of and public access to the organization’s archival materials. EDR recommends the allocation of \$5,000 towards this project.
- The Town of Cazenovia proposes two mitigation projects: repairs to South Cemetery and improvements to interpretive signage at New Woodstock Heritage Park. EDR recommends the allocation of \$5,000 towards the South Cemetery project.
- The Towns of Eaton, Fenner, Nelson, and Smithfield jointly propose a mitigation project to create a rehabilitation fund for historic buildings and a maintenance and interpretation fund for historic cemeteries located within the towns. EDR recommends the allocation of \$72,000 towards this project.
- The Town of Madison proposes a mitigation project to support the maintenance and rehabilitation of Indian Opening Cemetery. EDR recommends the allocation of \$5,000 towards this project.

In total, the Permittee (Liberty Renewables Inc.) is proposing herein offset funding for the Hoffman Falls Wind Project in the amount of \$119,500.

The Permittee will continue to engage with NYSHPO, ORES, and other state agencies and local stakeholders as needed to further refine the proposed mitigation projects discussed above. Following approval by NYSHPO and ORES of the Cultural Resources Mitigation and Offset Plan, the Permittee will provide cultural resources mitigation support as part of the execution of the Plan. Following the completion of mitigation activities, the Permittee will prepare a final letter summarizing the completed mitigation projects for submission to NYSHPO and ORES to demonstrate compliance with the conditions of the Plan.

#### 4.0 REFERENCES

Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR). 2023a. *Phase IB Archaeological Survey, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. December 13, 2023.

EDR. 2023b. *Phase IB Archaeological Survey Addendum Memo, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. December 22, 2023.

EDR. 2024a. *Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York, Phase IB Archaeological Survey Addendum Memo*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. September 19, 2024.

EDR. 2024b. *Historic Resources Survey Report, Hoffman Falls Wind, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. January 3, 2024.

EDR. 2024c. *Visual Impact Assessment, Hoffman Falls Wind, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. February 15, 2024.

EDR. 2025a. *Additional Phase II Testing and Phase II Investigation, Hoffman Falls Wind Project Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. August 12, 2025.

EDR. 2025b. *Phase II Site Examination Work Plan, Hoffman Falls Wind Project, Madison County, New York*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. August 15, 2025.

EDR. Forthcoming. *Visual Impact Assessment Addendum, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York*. Prepared for Liberty Renewables Inc. by Environmental Design and Research Landscape Architecture, Engineering, & Environmental Services, D.P.C., Syracuse, NY. Forthcoming.

Find A Grave. 2025. Photograph of Indian Opening Cemetery added by Anne Chambers, October 23, 2022. Available at: <https://www.findagrave.com/cemetery/2198492/indian-opening-cemetery/photo>. Accessed November, 2025.

New York State Office of Parks, Recreation and Historic Preservation, Division for Historic Preservation (NYSHPO). 2024a. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSOPRHP, Waterford, NY. Via CRIS, February 8, 2024.

NYSHPO. 2024b. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Correspondence from Robyn Sedgwick (NYSHPO) to EDR. NYSOPRHP, Waterford, NY. Via CRIS, March 15, 2024.

NYSHPO. 2025. *CRIS Online Help System*. Available at: <https://cris.parks.ny.gov/CRISHelp/?context=60>. Accessed December 2025.

**ATTACHMENT A**  
NYSHPO Correspondence



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

February 8, 2024

[REDACTED]

Re:

[REDACTED]

Dear [REDACTED]

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

We note that there are [REDACTED] within the five-mile zone of visual impact. Please see Appendix A for a complete list of historic resources. We have reviewed the submission received on January 26, 2024, including the Historic Resources Survey Report dated January 2024 and the list of visually sensitive resources. Based on that review, we offer the following comments and request some additional information:

- We note that the list of visually sensitive resources in Appendix C appears to be missing [REDACTED]. Please update Appendix C and the Historic Resources Survey Results Map to reflect all historic resources within the zone of visual impact.
- It appears that the project has the potential to impact the State/National Register Listed Lorenzo State Historic Site and the State/National Register eligible Chittenango Falls State Park. We request visual simulations from these resources looking towards the wind turbines to determine if, and to what extent, they will have views.

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

Sincerely,

[REDACTED]

[REDACTED]

cc: K. Primo – ORES

## Appendix A

USN	Name	Status	Historic District
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



**New York State  
Parks, Recreation and  
Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

March 15, 2024

[REDACTED]

Re:

[REDACTED]

Dear [REDACTED]

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 February 16, 2024, including the submitted Exhibits 8 and 9. Based on that review, it appears that [REDACTED] eligible or listed in the State and National Registers of Historic Places have the potential to be impacted by the proposed undertaking. It is the OPRHP's opinion that the project, as described, will have an Adverse Impact on historic resources.

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 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 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 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).

**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [parks.ny.gov](https://parks.ny.gov)

• 518-237-8643 • <https://parks.ny.gov/shpo> •

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

Sincerely,

[Redacted signature block]

[Redacted line]

**ATTACHMENT B**  
Sample Outreach Letter



September 9, 2025

<Contact Name>

<Organization>

<Address>

**RE: Hoffman Falls Wind Project – Historic Resources Mitigation Outreach**

<Edit Greeting>,

As you may be aware, Hoffman Falls Wind LLC (the Applicant) is in the process of developing the Hoffman Falls Wind Project (hereafter, the Facility), a wind-powered energy generating project located within the Towns of Fenner, Nelson, Smithfield, and Eaton, Madison County, New York. This Facility is being reviewed by the New York State Office of Renewable Energy Siting and Electric Transmission (ORES) under Article VIII of the New York State Public Service Law (which establishes the permitting process for large-scale renewable energy projects) and the New York State Historic Preservation Office (NYSHPO) under Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law.

Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) prepared historic resources surveys for review by the NYSHPO, which included the identification of historic resources (e.g., historic buildings, cemeteries, and bridges) that may be eligible for the State and National Registers of Historic Places (S/NRHP).

NYSHPO has requested that the Applicant develop a plan identifying possible mitigation projects to offset potential visual impacts on historic resources located within the Facility's viewshed (i.e., areas where wind turbines or other Facility infrastructure might be visible). Mitigation projects that have been proposed for other renewable energy facilities in New York State have included activities such as additional historic resources surveys, S/NRHP nominations, monetary contributions to the restoration and maintenance of historic properties, development of heritage tourism promotional materials, development of educational materials and lesson plans, and development of public history materials such as roadside markers.

We have identified your organization as a possible stakeholder that might be able to contribute to the identification of mitigation projects to offset potential impacts to historic resources from the Facility. Please respond to this letter by October 3, 2025, to indicate your interest in participating in the process of identifying potential historic resources mitigation projects for the

Facility. EDR will follow up with you to determine your interest if we have not received a response by this date.

Please note that as the permitting process for the Facility is ongoing, all discussions regarding historic resources mitigation are preliminary, and mitigation projects will not be funded or undertaken if the Facility is not constructed. In addition, historic resources mitigation projects must be reviewed and approved by NYSHPO before funding can be authorized. Typically, mitigation activities for approved mitigation projects will not be implemented until the Facility is under construction which will not occur unless and until the Facility is permitted.

If you have any further questions or would like to discuss the information herein, please contact me at [kolson@edrdpc.com](mailto:kolson@edrdpc.com), or by phone at 315-471-0688 x688.

Sincerely,

A handwritten signature in cursive script, appearing to read "K. Olson".

Kristen Olson  
Historic Preservation Project Manager

**ATTACHMENT C**  
Outreach Communication Matrix

Municipality or Organization	Contact(s) and Title(s)	Date(s) of Outreach	Mode(s) of Outreach	Outcome
Cazenovia Heritage	[REDACTED]	9/11/2025	email; telephone; videoconference	[REDACTED] replied via email on September 11, 2025, expressing interest in participating. [REDACTED] discussed five potential projects with EDR and submitted proposals for three potential projects via email on November 12, 2025.
Cazenovia Preservation Foundation	[REDACTED]	10/30/2025	videoconference	[REDACTED] attended a videoconference hosted by Madison County Historian [REDACTED] on October 30, 2025. EDR continued correspondence via email with [REDACTED] including a follow-up email on December 4, 2025. To date there has been no further response from the Cazenovia Preservation Foundation.
Cazenovia Public Library	[REDACTED]	10/30/2025	videoconference	[REDACTED] attended a videoconference hosted by Madison County Historian [REDACTED] on October 30, 2025. To date there has been no further correspondence from the Cazenovia Public Library.
Chenango Canal Association	[REDACTED]	N/A	email	[REDACTED] responded to EDR's outreach in her capacity as Town of Madison Historian and also inquired about the Chenango Canal Association putting forth a mitigation project proposal. Project ideas were discussed via telephone and email. [REDACTED] provided a project proposal with cost estimates via email on November 29, 2025.
Daughters of the American Revolution, James Madison Chapter	[REDACTED]	N/A	email	[REDACTED] contacted EDR after hearing about the CRMOP development process from Madison County Historian [REDACTED] and provided a project proposal via email on November 28, 2025.

Municipality or Organization	Contact(s) and Title(s)	Date(s) of Outreach	Mode(s) of Outreach	Outcome
Erieville-Nelson Heritage Society	[REDACTED]	9/11/2025; 9/25/2025	email; videoconference	[REDACTED] attended a videoconference hosted by Madison County Historian [REDACTED] on October 30, 2025. EDR continued correspondence with [REDACTED] by phone and email. [REDACTED] identified a potential mitigation project.
Friends of the Old Town of Eaton Museum	[REDACTED]	9/11/2025; 11/13/2025	email	[REDACTED] responded via email on December 1, 2025, with a project proposal.
Fryer Memorial Museum	[REDACTED]	9/11/2025; 9/25/2025	email	To date there has been no response from the Fryer Memorial Museum.
Madison County	[REDACTED]	9/11/2025	email; videoconference	[REDACTED] replied on September 15, 2025, indicating an interest in participating. On October 30, [REDACTED] hosted a videoconference for historians and others during which EDR summarized the CRMOP process and fielded attendees' questions. EDR continued to correspond with [REDACTED], who provided additional organization contacts. In an email on December 4, 2025, [REDACTED] indicated that his office would not be proposing a mitigation project.
Madison County Historical Society	N/A	9/11/2025; 11/7/2025	email	To date there has been no response from the Madison County Historical Society.
Madison Hall Association	[REDACTED]	9/11/2025; 11/7/2025	email	To date there has been no response from the Madison Hall Association.
Morrisville Public Library	[REDACTED]	9/11/2025; 11/13/2025	email	To date there has been no response from the Morrisville Public Library.
National Abolition Hall of Fame	[REDACTED]	9/11/2025	email	See Smithfield Community Association and Town of Smithfield correspondence outcomes.

Municipality or Organization	Contact(s) and Title(s)	Date(s) of Outreach	Mode(s) of Outreach	Outcome
Nelson Preservation Associates	[REDACTED]	9/11/2025; 11/13/2025	email	[REDACTED] replied via email on November 19, 2025, proposing a mitigation project.
Peterboro Area Historical Society	[REDACTED]	9/11/2025	email, telephone	[REDACTED], who received EDR's outreach letter in her capacity as Town of Smithfield Historian, contacted EDR via email on November 28, 2025, regarding a potential project for the Peterboro Area Museum, which is managed by the Peterboro Area Historical Society. EDR corresponded via telephone with [REDACTED] and [REDACTED] to develop a proposed project.
Smithfield Community Association	[REDACTED]	9/11/2025	email; telephone	[REDACTED] replied on November 10, 2025, and continued to correspond with EDR via email. [REDACTED] provided a single mitigation project proposal on behalf of the towns of Eaton, Fenner, Nelson, and Smithfield on December 17, 2025.
Stone Quarry Art Park	[REDACTED]	9/11/2025	email	CEO [REDACTED] replied on September 16, 2025, expressing interest in participating. EDR followed up via email on September 20, 2025. On December 3, 2025, [REDACTED] provided a mitigation project proposal via email.
Town of Cazenovia	[REDACTED]	9/11/2025	email	[REDACTED] replied on September 19, 2025, requesting additional information. On October 2, 2025, [REDACTED] sent a letter confirming the town's interest in participating. [REDACTED] and [REDACTED] met with EDR via videoconference on October 30, 2025. [REDACTED] provided a project proposal on behalf of the Town of Cazenovia on December 15, 2025.

Municipality or Organization	Contact(s) and Title(s)	Date(s) of Outreach	Mode(s) of Outreach	Outcome
Town of Eaton	[REDACTED]	9/11/2025	email	[REDACTED] replied on September 12, 2025, to state that the outreach letter had been received. On September 26, 2025, [REDACTED] discussed potential mitigation projects with EDR by telephone. EDR continued to correspond with municipal representatives via email. On December 17, 2025, Town of Smithfield Deputy Supervisor [REDACTED] provided a single mitigation project proposal on behalf of the towns of Eaton, Fenner, Nelson, and Smithfield.
Town of Fenner	[REDACTED]	9/11/2025; 11/13/2025	email, telephone	[REDACTED] responded via telephone on December 3, 2025. On December 17, 2025, Town of Smithfield Deputy Supervisor [REDACTED] provided a single mitigation project proposal on behalf of the towns of Eaton, Fenner, Nelson, and Smithfield.
Town of Lincoln	[REDACTED]	9/11/2025	email	EDR spoke with [REDACTED] on October 6, 2025. To date, there has been no further communication from the Town of Lincoln.
Town of Madison	[REDACTED]	9/11/2025	email	[REDACTED] replied on September 15, 2025. EDR subsequently corresponded with [REDACTED] via email and telephone regarding a proposed mitigation project.
Town of Nelson	[REDACTED]	9/11/2025; 11/13/2025	email	[REDACTED] attended a videoconference hosted by Madison County Historian [REDACTED] on October 30, 2025. EDR continued correspondence with municipal representatives. On December 17, 2025, Town of Smithfield Deputy Supervisor [REDACTED] provided a single mitigation project proposal on behalf of the towns of Eaton, Fenner, Nelson, and Smithfield.

Municipality or Organization	Contact(s) and Title(s)	Date(s) of Outreach	Mode(s) of Outreach	Outcome
Town of Smithfield	[REDACTED]	9/11/2025	email	[REDACTED] responded on September 17, 2025. EDR continued correspondence with municipal representatives. On December 17, 2025, Town of Smithfield Deputy Supervisor [REDACTED] provided a single mitigation project proposal on behalf of the towns of Eaton, Fenner, Nelson, and Smithfield.
Town of Stockbridge	[REDACTED]	9/11/2025; 9/25/2025	email	EDR spoke with [REDACTED] on October 6, 2025. To date, there has been no further communication from the Town of Stockbridge.
Town of Sullivan	[REDACTED]	9/11/2025	email	EDR spoke with [REDACTED] on October 6, 2025. To date, there has been no further communication from the Town of Sullivan.
Village of Cazenovia	[REDACTED]	9/11/2025; 11/1/2025	email	To date there has been no response from the Village of Cazenovia.
Village of Morrisville	[REDACTED]	9/11/2025	email	[REDACTED] responded in her capacity as Town of Eaton Historian. To date there has been no further response from the Village of Morrisville.
Village of Munnsville	[REDACTED]	9/11/2025; 11/1/2025	email	[REDACTED] replied via email on November 16, 2025, to suggest contacting the Fryer Memorial Museum. To date there has been no further response from the Village of Munnsville.

**ATTACHMENT D**

Project Related Mitigation Correspondence and Project Cost Estimates



## **Proposed Cultural Resources Mitigation Projects**

**Cazenovia Heritage, Inc.  
Hoffman Falls Wind Turbine Project**

**I. Cazenovia's Early Industries -- Interpretive Signage**

**II. National Register/Village Historic District – Demarcation Entrance Signs**

**III. Lakeland Estate Archeological Fieldwork Study – Lakeland Park**

## Proposed Cultural Resources Mitigation Projects

### Cazenovia Heritage, Inc. Hoffman Falls Wind Turbine Project

#### I. Cazenovia's Early Industries -- Interpretive Signage

**Estimated Cost: \$17,000** (Frames \$12,000 + Sign Design & Production \$5,000)

The Chittenango Creek provided power for numerous industries in Cazenovia during the 19<sup>th</sup> and early 20<sup>th</sup> centuries in the area along today's Riverside Drive and northward along the creek and adjacent to the former Lehigh Valley Railroad track. Grist mills, saw mills, a variety of manufacturers, wool and clothier factories, clock makers, a paper mill, among many others, could be found in this roughly two-mile stretch. Today's public Gorge Trail, maintained by the Cazenovia Preservation Foundation (CPF), follows the northern portion and was recently enhanced in 2024 with a new entry point off Albany Street. The Riverside Drive area today includes a small public park, a Boy Scouts lodge, and a creekside viewing deck. (see attachments and photos)

This project would install interpretive signage, each approximately 3.5 feet x 3 feet, having a timber-frame base and high-pressure laminate sign of text and graphics. Six potential sign sites have been identified, two near extant buildings and four at known locations of former factories/mills. Uniform signage would physically and visually connect these two popular public areas, each having hundreds of visitors annually, while informing the public of the vital role these industries played in the socio-economic development of Cazenovia.

Exploratory discussions have been held with CPF and the Cazenovia Village Historic Preservation Commission, with favorable response.

#### II. National Register/Village Historic District – Demarcation Entrance Signs

**Estimated Cost: \$12,000** (Markers \$6,000 + Posts and Installation \$6,000)

The Village of Cazenovia Historic District was listed on the National Register of Historic Places in 1986, yet its boundaries are not commonly known to current residents of the Town and Village. This area currently embraces 360 residences, commercial buildings, churches, and other structures, including the Historic Business District. Greater awareness of the District would engender public pride and stewardship of the historic architecture and cultural resources within this area that contribute to Cazenovia's unique sense of place. (The District can be found on the NYS CRIS system, <https://cris.parks.ny.gov/Login.aspx?ReturnUrl=%2f> )

Signs are anticipated to be no larger than 18" x 26" of metal-coated high-density urethane, raised lettering, and mounted on a 6-foot post. The text of signs would be developed in collaboration with the Village Historic Preservation Commission, Village Board of Trustees, and public, and likely would reference Cazenovia's founding, extensive historic architecture, former industries, and/or contributions to Central New York. Five signs are anticipated, all with the same text: one on each of the northeast, northwest, southeast, and southwest boundaries, and one on the eastern boundary edge.

This potential project has been reviewed with the Historic Preservation Commission of the Village of Cazenovia.

### **III. Lakeland Estate Archeological Fieldwork Study – Lakeland Park**

**Estimated Cost: \$5,000** (Equipment Rental & Operator: \$2300; + \$2400 Consultant for Field Analysis & Report Preparation, \$300 Incidentals)

The Lakeland Estate was built by Samuel Forman in 1813, after having lived on the site in his original frame house of 1793. Forman was the Clerk to Cazenovia's founder John Lincklaen, both of whom came and founded Cazenovia in 1793. Sited along Cazenovia Lake, the house was sold in 1822 to Jacob and Elizabeth Ten Eyck, followed by Henry Ten Eyck and Jesse Carpenter through 1928, when Howard Phelps and Henry Burden bought it and attempted a Tea House through 1934. The latter venture could not survive the Great Depression, and the estate was demolished in 1937. The site, however, was adopted subsequently as a public park by the Village. It has a public swimming area, pier, bathrooms, walking paths, and band pavilion, and provides passive park recreation for all. Additional improvements have been undertaken by the Village to stabilize the retaining walls and to improve site drainage.

This project would aim to add to the public's appreciation and knowledge of the past. Archival documents, research, and historic maps have already confirmed the actual location of the house; however, each period of ownership had modifications and expansions, as well as changes in land mass due to landfills undertaken. Archeological examination could determine the foundations, provide structural evidence, and potentially uncover historic artifacts. This would further a broader understanding of the house, its exact siting, architectural modifications made and by which owner, and potential cultural objects, tools, and housewares.

Mitigation funds are requested for the fieldwork. This fieldwork would determine the potential of viable areas for further study and careful, controlled excavation. Tests would be undertaken utilizing minimally invasive techniques. These would include ground penetrating radar to identify foundations or dense layers of debris; and/or magnetometry to identify hearths or stone walls to determine the house's layout. Such tests would identify any areas for further excavation work. A public presentation and report would be undertaken, describing findings, analysis, and recommendations for future phases of the project.

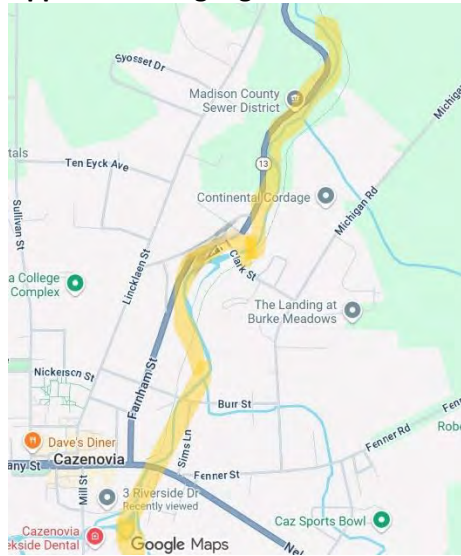
This potential project has been reviewed with the Historic Preservation Commission. Coordination with the Village-Town Parks Committee also would be undertaken.

### **Attachments**

**Proposed Cultural Resources Mitigation Projects  
Cazenovia Heritage, Inc.  
Hoffman Falls Wind Turbine Project**

**I. Cazenovia's Early Industries -- Interpretive Signage**

**Approximate Signage Route:**



**Example, Signage Frame (L) and Sign (R):**



**Example, Potential Costs, Interpretive Sign**, Timberhomes Vermont, <https://timberhomesllc.com/> at Nov 2025

**“All-Natural, Timber Frame Interpretive Sign Frame**

A rugged and beautiful structure, our Interpretive Sign is a great addition to any park, museum, or municipality hoping to highlight a natural feature or historic building to the public. A curving cherry beam ties together the Black Locust posts with traditional mortise and tenon joinery. The timber members are all made from Black Locust, a naturally rot-resistant wood species from our northern New England forests. As part of the kit, we supply metal mounting brackets that easily attach to your display panel. If desired, TimberHomes Vermont can help facilitate design and production of your display. Placed low to the ground, the Interpretive Sign is easily viewed and enjoyed by all at your scenic overlook, riverside park, or museum.

**“Pricing for Interpretive Sign Frames**

**Single unit: \$1,600**

**5 or more: \$1,500”**

Representative Photos: Route of Cazenovia's Early Industries, Extant Buildings, Current Paths/Trails

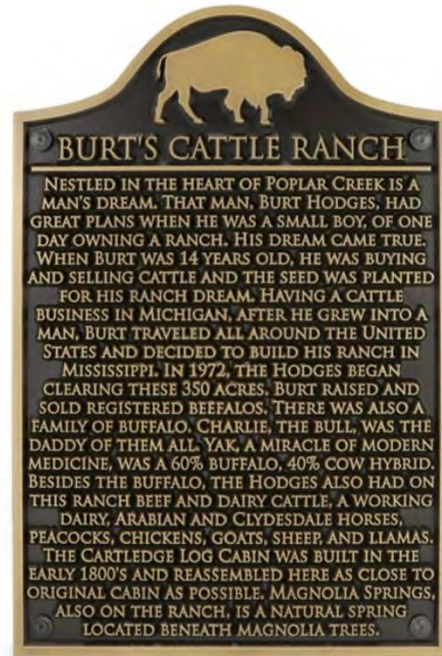


## II. National Register/Village Historic District – Demarcation Entrance Signs

### Map – Village NR/Historic District:



### Example, Historic District Sign:



Example, Potential Costs, Historic District Sign, Atlas Signs & Plaques, <https://atlassignsandplaques.com/> at Nov 2025

### “Your Historical Marker

**\$950.00**

‘Your Historical Marker’ is a customizable marker that beautifully commemorates historical landmarks, events, and figures. Crafted with attention to detail and durability, it’s an ideal choice for preserving our shared heritage.

10.5”W x 15”H

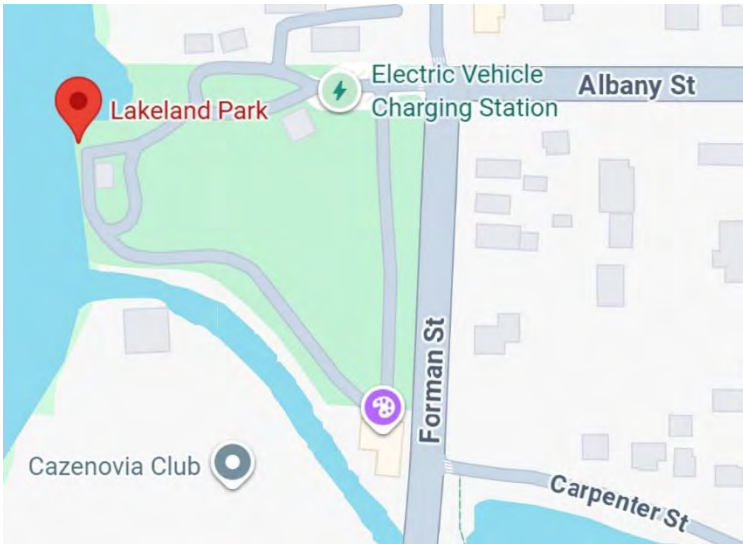
14”W x 20.5”H

18”W x 26”H

**Metal Coated HDU”**

### III. Lakeland Estate Archeological Fieldwork Study – Lakeland Park

#### Map/Location of Lakeland Park:



Example, Costs of Electromagnetic instruments and Ground Penetrating Radar can be found at:

<https://kdjonesinstruments.com/wp-content/uploads/sites/15/2024/11/KDJIC-Prices-as-of-11252024.pdf>

Average for GPR and Electromagnetic equipment: \$200 per day plus prep fees of \$240 + operator labor @ \$60/hour (\$480/day)

Day 1:  $200 + 240 + 480 = \$920$

Day 2:  $200 + 480 = 680$

Day 3:  $200 + 480 = 680$

Total: \$2280

3 days assumed, specific equipment model to be determined

#### Archeological Consultant:

Estimated at \$100/hour x 24 hours = \$2400

**Representative Photos: Lakeland Estate Site, Lakeland Park**



*Lakeland Site Structures, Land, and Shoreline Changes, 1800-1875; prepared by Ted Bartlett, Village Historic Preservation Commission, 2024*

# Request for Consideration for Hoffman Falls Wind Project Cultural Resources Mitigation Grant

Re: Chenango Canal Association, Inc. (CCA)

**Project 1:** Removal and rebuilding of 3 worn out staircases that provide access to both the Canal trails, and the Canal overlook deck at the Museum.

**Staircase 1** is directly aside the Museum at the intersection of Rt 20 and Canal Rd.

**Staircase 2** is south of Rt 20 on Canal Rd.

**Staircase 3** is north of Rt 20, close to the Canal Rd intersection. All need replacement.



**Stair 1:** 13 ft long  
Concrete blocks filled with gravel and a pressure treated handrail. The foundation under the blocks has depressed and the stairs are not level. Handrail is worn and not code compliant.  
The stair would be replaced with a fully wooden staircase and handrail with grip coating on treads



**Stair 2:** 20 ft long  
Pressure treated stacked cribs filled with stone. Wood is degraded, handrail worn & PT handrail. The foundation under the cribbed steps has shifted and the stairs are not level. Handrail is worn and not code compliant.  
The stair would be replaced with a fully wooden staircase and handrail w/ grip coating on treads



**Stair 3:** 29 ft Long.  
PT stacked cribs filled with stone. Wood is degraded, handrail worn and PT handrail not Code compliant. The foundation under the cribbed steps has shifted and the stairs are not level. Handrail is worn and not code compliant.  
The stair would be replaced with a fully wooden staircase and handrail w/ grip coating on treads

## Request for Consideration for Hoffman Falls Wind Project Cultural Resources Mitigation Grant

**Project 2:** Proposed is replacement of two weather damaged 21-year-old Museum identification signs located on Rt20, as well as a small block patio under the signs. They are located at the corner of Rt20 and Canal Rd at the Museum



### Signs 1 and 2:

Signs were installed in 2004 and have started to discolor and delaminate from weather exposure.

One sign is a 56 x 43 in. Oval and the other is a 26x42 in rectangle shown

The Signs would be replaced with same appearance but with modern materials and construction.

## Request for Funds:

Cost of replacing these signs using Contracted and Volunteer labor is as follows:

- **Project 1- Stairs:**
  - **Total Cost for this project is: \$25,000**
  - Sources: Stairs Quote from R&B Innovative Construction, Eaton, NY on 11-28-25
  
- **Project 2- Two Signs and Patio:**
  - Sign Oval: \$710 Similar with updated materials and text
  - Stair Square Map: \$ 500 estimated with updated weatherproof materials
  - **Total Cost for this Project is: \$1,210**
  - Sources:       Oval Sign Quote from Terry Signs, Hamilton NY on 11-28-25  
                      Square map sign quote estimate from CCA

- 
- **Total Cost for Project 1 and 2: \$26,210**

# Project Proposal

Prepared for: Chenango Canal Association

Prepared by: [REDACTED]

November 28, 2025

Proposal number: 2025-89

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## R&B INNOVATIVE CONSTRUCTION

# EXECUTIVE SUMMARY

### Objective

The goal of this project is to replace existing damaged stairs with new free standing stairs and trees, safer wooden decking stairs. This will allow the stair to be lifted off of the ground and easier to maintain. This replacement aims to enhance safety while maintaining the aesthetic appeal of the surrounding area.

### Project Outline

#### **\*\*Project Proposal: Construction of New Staircases\*\***

We propose to build three new sets of staircases using high-quality pressure-treated lumber. This durable material will ensure longevity and stability for each stairway. These stairs will be elevated and secured to 4x4 post. Allowing safer and more secure free standing stairs. Once the stairs are completed, we will apply a coat of deck-over paint to protect the lumber from the elements and create a non-slip surface for safety and ease of use.

#### 1. **\*\*Assessment of Existing Stairs:\*\***

- Conduct a thorough inspection of the current stairs to evaluate the extent of the damage and determine any underlying issues that need to be addressed.

#### 2. **\*\*Design and Material Selection:\*\***

- Select a high-quality, durable wood suitable for exterior use, ensuring that it can withstand weather elements and regular foot traffic.
- Design the new stairs to be aesthetically pleasing, in harmony with existing structures, and compliant with safety regulations. This is to be included on all 3 stair ways.

#### 3. **\*\*Demolition of Old Stairs:\*\***

- Safely remove the existing damaged stairs, ensuring that debris is properly disposed of and that surrounding areas are protected from damage during the process.

#### 4. **\*\*Construction of New Wooden Decking Stairs:\*\***

- Construct the new stairs using the selected materials, ensuring adherence to safety standards and regulations.
- Incorporate safety features such as railings and non-slip surfaces where applicable.

#### 5. **\*\*Finishing and Preservation:\*\***

- Apply protective coatings to the wood to prevent wear and prolong the lifespan of the stairs.
- Ensure the finish complements the overall aesthetic of the property.

#### 6. **\*\*Final Inspection and Safety Check:\*\***

- Conduct a final inspection to ensure that the stairs are safe, functional, and visually appealing.
- Address any issues that arise during the inspection before the project is considered complete.

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**COMPANY NAME**

**BUDGET**

Description	Quantity	Unit Price	Cost
Renovation to stairs	1	\$25,000	\$25,000
This is for all three stairways and entry way to museum		\$0	\$0
	0	\$0	\$0
<b>Total</b>			<b>\$25,000</b>

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**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Hoffman Falls Wind Project Cultural Resources Mitigation and Offset Plan  
**Date:** Monday, December 1, 2025 9:14:23 AM

 IRONSCALES couldn't recognize this email as this is the first time you received an email from this sender kbootiedar@gmail.com

You don't often get email from [REDACTED]@gmail.com. [Learn why this is important](#)

[EXTERNAL SENDER]

Good evening [REDACTED],

I hope you had a wonderful Thanksgiving.

I am the Vice Regent of our local DAR (Daughters of the American Revolution) Chapter located in Hamilton, NY. Matt Urtz, Madison County Historian, recently shared your information with me regarding the potential for Historical Preservation Funding, which I shared with my Chapter at our recent monthly meeting.

Our Chapter has been very active in the past several years working with cemeteries throughout Madison and Chenango County to identify Revolutionary Soldiers that are buried in these cemeteries, as well as worked with several folks to clean and repair headstones of those soldiers.

In talking to my chapter, if funding were available to support the associated cost, we would be interested in expanding what we do beyond just identifying Revolutionary Soldiers. Unfortunately, we would not be able to put together a formalized proposal that includes exact locations, the cost of repairs at each location, or cost for publishing the information for use by historians and researchers, by the end of November.

I can however, share with you some of the ideas our chapter would be interested in exploring and if you are open to it, would love to meet with you to discuss in more detail. If the project ideas are something that would be feasible for this funding then we can move forward with trying to get more details about the specific cemeteries and some cost estimates (some of which may have to wait till spring when we can actually access some of the more remote cemeteries).

- Identify all individuals buried in each cemetery and through genealogy research identify all veterans (of any war) buried in that cemetery.
  - We would also like to place appropriate military markers for each stone and purchase flags to be placed for memorial day
- Identify headstones that require cleaning, repair, or have been knocked down and broken and in many cases partially buried. We would then, where possible, clean, repair, and erect those stones back to their proper location.
- Map the cemetery and headstone locations and publish that information to support genealogical and historical research.
  - We often find it difficult to accurately map these older cemeteries that may not be laid out in distinct grids, so if funding was available we would like to explore

having an app or software program developed that could assist with accurately mapping a cemetery.

- If feasible we would like to also provide signage at each cemetery that provides information to visitors about the cemetery and where to find specific information about those buried there.
- Lastly, we are also exploring options of possibly coordinating with the Madison County Tourism Department to create a historical trail of cemeteries for all of Madison County and the information from the cemeteries in this project would be incorporated into that bigger project.

As I indicated above, while we have a rough idea of what we would like to be able to do if funding was available, we do not have at this time a good estimate of the cost. We did however, based on what we could determine from the map that was included in the information that was emailed out, identify that there are roughly 60 cemeteries that could potentially fall within the study radius. This number could increase depending on how much of the Town of Madison might be included or potentially decrease once we have a more detailed map of the study area that might exclude some of the cemeteries that are near the outsides of the affected towns.

If the ideas we have presented above could be a potential candidate for the available funding, please let me know and I'd be happy to set up a time to discuss further. The best way to reach me is by email, however, I can also be reached by phone @ [REDACTED] most weekdays after 3 pm or anytime on weekends.

Thank you for your time and I look forward to speaking with you about this project.

[REDACTED]

Vice-Regent  
James Madison Chapter, DAR



Erieville- Nelson Heritage Society  
4085 Nelson Rd.  
Cazenovia, NY 13035

Attention: [REDACTED]  
EDR Historic Preservation Project Manager  
EDR Hoofman Falls Wind Project  
Cultural Resources Mitigation Plan

Dec. 5, 2025

This letter is to request funding from the Hoffman Falls Mitigation Project for Erieville - Nelson Heritage Society. We are a 501 (c)3 non profit organization whose main focus is archival collections of documents, maps, stories, and photographs, among other things as well as educating the public about all aspects of our local history.

To help educate the public, a very large focus of ours has been to publish a 12 page historical periodical three times a year, dedicated to our Erieville- Nelson history, titled "Hills and Hollows". Our periodical was first published in January of 2017 and soon we will celebrate our 10th anniversary of publication in January of 2027. Our goal is to create a book consisting of all volumes of 10 years of publication of our "Hills and Hollows". It has been an extremely successful way to engage membership in our organization and interest in our community's history and also for those living elsewhere with ties to our community.

We would like to create the Hills and Hollows 10 year anniversary book so that we can make it available to libraries, historical societies, schools and repositories in all of our surrounding communities (particularly Madison County). We would also like to make copies available to the public. We feel this project would be particularly impactful with our younger school age community members through school and library distribution.

We fund our three volumes per year with advertising local businesses in the publication and by membership dues, however this project is beyond our means and we would like to be able donate many of them to our local repositories, meaning we would not make a profit on this endeavor, between the cost of the book and the postage to mail many of them.

We are requesting funds for the cost of printing 250 copies of the "Anniversary Edition of 10 years of Hills and Hollows" and the cost to mail 100 copies, as well as postage for approximately 700 mailing of our quarterly periodical, as postal prices have increased immensely.

This would break down as:

\$9,901.45 for the printing of 250 copies  
\$522.00 for Media mail rate for 100 books (under 2 lbs. )at \$5.22 each.  
\$749.00 for mailing of 2 oz periodical for 700 mailings at \$1.07 each (approximately one year of our yearly periodical mailings)

**\$11,172.45 total.**

Thank you so much for your consideration for funding our project. Attachments below.

[REDACTED]  
Hills and Hollows Editor and Committee Head  
Erieville Nelson Heritage Society

Here is a link to Erieville-Nelson Heritage Society's "Hills and Hollows" publication

<https://nelson-ny.org/index.php/town-info/newsletter-hills-and-hollows>

Heere is a link to our latest volume (Sept 2025)

[https://drive.google.com/file/d/13hk1H6JYRAdOvHZgexGWu4qWOUAU5oH-/view?usp=share\\_link](https://drive.google.com/file/d/13hk1H6JYRAdOvHZgexGWu4qWOUAU5oH-/view?usp=share_link)

**Ansun**  
GRAPHICS  
 6392 Deere Road  
 Syracuse, NY 13206  
 P: 315.437.6869  
 www.ansungraphics.com

**QUOTATION**

Quote Information	
Quotation Number:	39417
Quotation Date:	12/2/2025
Sales Rep:	Todd Thomas
Estimator:	Todd Thomas
Page:	Page 1 of 2

Customer Information	
Customer Account:	ERIE100
Name:	Erieville-Nelson Heritage Society
Address:	Erieville, NY 13061
Contact:	[REDACTED]
Phone:	

Job Information	
Job Description	Hills and Hollows Compilation Perfect Bound Booklet Artwork provided - PDF/hard copy proof for approval 8.5" x 11" finished size - 4/4 w/bleeds on 100# silk cover and 80# silk text trim, score covers, fold, perfect bind & trim to 8.5" x 11" finished cartonpack
Comments:	

Component Information			
Component:	Cover	Bleed:	Yes
Size:	8.5 X 11	Stock Description	silk coated cover
# Of 1 Sided B/W:	0	Color:	white
# of 2 Sided B/W:	0	BWT:	100
# Of 1 Sided Color:	1	Thickness:	.0110
# of 2 Sided Color:	0		
# of B/W & Color:	0		
# of Blank Copies:	0		
Component:	320-pgs. text	Bleed:	No
Size:	8.5 X 11	Stock Description	silk coated text
# Of 1 Sided B/W:	0	Color:	white
# of 2 Sided B/W:	0	BWT:	80
# Of 1 Sided Color:	0	Thickness:	.0043
# of 2 Sided Color:	160		
# of B/W & Color:	0		
# of Blank Copies:	0		
<b>Quantity</b>	<b>Price</b>	<b>Per Each</b>	
500	\$19,030.95	\$38.06	
750	\$27,544.06	\$36.73	
1000	\$35,740.43	\$35.74	
250	\$9,901.45	\$39.61	

USPS **Media Mail** is a cost-effective shipping option for eligible educational materials, with prices **starting at \$4.47** at a [Post Office](#). Rates are based solely on the weight of the package, not the distance it travels, and all packages are subject to inspection. [↗](#)

### Current Media Mail Rates (Retail)

Below are the estimated retail prices for Media Mail based on weight: [↗](#)

Weight Not Over (pounds) <a href="#">↗</a>	Rate
1 lb.	\$4.47
2 lbs.	<b>\$5.22</b>
3 lbs.	\$5.97
4 lbs.	\$6.72
5 lbs.	\$7.47
...	...

The current USPS. [↗](#)

### First-Class Mail (Standard Letter)

- **1 oz:** \$0.78
- **2 oz:** \$1.07 (\$0.78 + \$0.29)
- **3 oz:** \$1.36 (\$1.07 + \$0.29) [↗](#)



### Duties of the Local Historian

Our local town historian is appointed by the town supervisor, to serve without compensation, with the responsibility of promoting the establishment and improvement of programs for the management and preservation of nongovernmental historical records held by libraries, historical societies, other repositories and individuals, to carry out and actively encourage research in such records in order to add to the knowledge, etc. of the town's history.

### Why I Am Interested in Our Local History by M. Fay Lyon, Nelson Town Co-historian

My family's history, as far as Nelson is concerned, goes back to 1794 when 21 families migrated from Vermont to settle in Number 1 Township which was part of Cazenovia at the time. Ebenezer Lyon, my 6<sup>th</sup> generation grandfather, was one of those pioneers and he bought land on Hardscrabble Road (Huffalen Farm) where he and his wife raised a family of 14 children. He became a judge of the Court of Common Pleas in the early 1800s and was elected the first town supervisor and served in that capacity on and off, for 10 years. My 4th generation grandfather, Merritt D. Lyon, was supervisor in 1874 and was the historian for the Centennial celebration in 1894 commemorating the migration of the pioneers to our town in 1794.

### Past Achievements in Historical Research

Since I was appointed to be the Nelson Town Historian in the year 2000, some attempts at research have had a successful outcome, and some not.

The first endeavor was trying to find out what happened to the tall case clock made in the very early 1900s, had 45 panels in it with names of Nelson citizens written on a memorial plaque, each being a different kind of wood in each panel. It was sold to Fred Southworth of Morrisville in 1917 and it was hoped that it would never leave Madison County. Even though it has been publicized at different times, it has never been found.

Another instance was the discovery that Emma Ward Bucknell, a former citizen of Erieville and Cazenovia, was a survivor of the sinking of the Titanic in 1912, and is buried in the Erieville Cemetery. An interesting story.

Cooperating with the Erieville - Nelson Heritage Society, displays were put on at Cottage Lawn in Oneida in 2006 celebrating Madison County's bicentennial when it was split off from Chenango County in 1806.

This year celebrated the Town of Nelson's bicentennial with various programs including a farm tour in 2007, when the town was split off from Cazenovia in 1807.

I copied the more recent Erieville church records, which were kept from the late 1800s to the mid-1950s, so that we would have more than one copy. The original was returned to the Erieville church people. When the Erieville Church became defunct, the older records of the church were donated to the Heritage Society. Some of the early records of the Nelson United Methodist Church have also been copied. All are filed in the town's archives.

Over the years, numerous queries have been posted seeking information and ancestors of different families who were Nelson residents at one time. Attempts have been made to answer the questions, but have had various success in doing so. These family files are in the archives at the town office building.

Another project that was undertaken was the uploading of the Heritage Society's collection of slides onto the New York Heritage website. With the help of Laine Gilmore's technical expertise, that was accomplished.

With the help of Jim Georges and Kevin Davies, the burials of people who have illegible or no headstones, in the town's cemeteries, were documented. The Erieville Cemetery has over 235 such burials alone. Most of these burials were from 1857 and on.

Also, as of 2016, my recommendation to the town supervisor, appointing Laine Gilmore as co-historian of the Town of Nelson, was acted upon. Laine has the technical skills as well as being a professional genealogist and adds a lot of expertise to the historian's post.

### Remembrances by Celia L. Odell Markowski (written about 2007-08 for ENHS)

I was born November 22, 1919, daughter of Clarence and Elsie Seeley Odell, on what is now Chappe Hill, about 1 1/2 miles northeast of the village of Erieville, on a large farm and we lived in the tenant house.

My brother, Ivan, was also born there in 1923 and then we moved to Syracuse for a year or so while Dad worked at Brown - Lipe and Chapin, and my brother, Arnold, was born in March 1924. That summer we moved back to Erieville to a small house, now gone, next to Sarah Beebe. Lois Stauring's grandmother (Yvonne Luetlin lives there now), Sarah took in washings, done on a washboard, of course, and she always had



### Emma Bucknell - Twice a Survivor by M. Fay Lyon, Town of Nelson Co-historian

It was shortly after I was appointed town historian, around 2000, that I received a phone call from someone who was on the road to Erieville, inquiring about a person who was buried in Erieville Cemetery, who was a survivor of the sinking of the Titanic. I knew absolutely nothing about it. I never heard from the caller again, so whether or not he was successful in finding the gravestone, I do not know.

It wasn't until about ten years later, that by happenstance, I found out who it was. It all came to light eventually when I got a phone call from an antique dealer from Burlington Flats, NY, who had purchased a tombstone at an auction. She googled Cordelia Ward, the name on the stone, and found out that she was buried in Erieville Cemetery.

Now knowing the name, my wife and I started searching for the Ward plot in the cemetery. We found it way up in back and on the lot was an obelisk with the names William Ward, Missionary, his wife Cordelia and their little boy, William, about 4 years old. But, also on the lot were more headstones. One was of the Helfron family, probably Cordelia's brother and his wife. Another one was a headstone of Emma Ward Bucknell, wife of William Bucknell, 1853-1927.

Cordelia Ward, grew up in Erieville, daughter of Erieville's first resident physician Dr. John Helfron. He also was a school teacher and probably taught his own daughter during her younger years. She attended Cazenovia Seminary for the rest of her high school education. Somehow, she became acquainted with William Ward who got his Doctorate of Divinity from Madison University (now Colgate). They fell in love, were married and then almost immediately left for Assam, India, becoming missionaries for the Baptist Church and translating the Hebrew Bible into the Assam language. It was in Assam where Emma and her brother Willie were born.

After about seven years, Cordelia fell ill and had to return to the states where William took up a pastorate in Wellesville, NY. Eventually, about 1859, Cordelia died, probably in childbirth, since a daughter Mary was born about that time. Cordelia's body was shipped back to Erieville to be buried on her brother's cemetery lot.

Emma was sent to her Aunt Mary Goodell's home in Cazenovia where she remained for the rest of her childhood, eventually attending Cazenovia Seminary like her mother. Her little sister Mary moved in with her Uncle Joseph and Aunt Sally Helfron, also in Cazenovia.

William was anxious to get back into missionary work, so very soon after his son Willie died, he went back to India, but not before getting married again to a widow of another missionary. Both worked in the missionary field before being furloughed again, about 1870, to come home and raise more funds to carry on their foreign work. This time he moved his

whole family to Beverly, New Jersey. It was here where Emma was introduced to Mr. William Bucknell.

Mr. Bucknell was a wealthy person dealing in real estate and promoting the use of gas and water utilities in several cities in Pennsylvania, and was also a generous giver to the activities of the Baptist Church. He was one of the founders of Lewisburg University in PA, the university which eventually became Bucknell, in honor of all his giving.

Mr. Bucknell was infatuated with Emma, so much so, after losing two wives previously and being lonely as a result, convinced her father and in turn her father convinced her that she should give her hand in marriage to Mr. Bucknell, even though he was sixty years old and she was only eighteen.

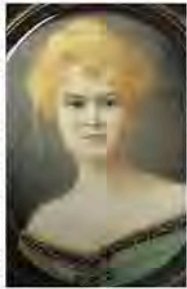


Photo from "Emma Eliza Bucknell, Titanic Survivor," by D. Fiodin Soderman

William Ward saw an opportunity with the marriage proposal. With Mr. Bucknell donating large sums of money to Baptist causes a new source of funding would be available for his missionary work. So, with her father officiating, the marriage was held.

Understandably, the marriage was not a happy one. Over the years she did have four children, none of which her husband wanted. He did not provide adequate funds to raise his family, so she had to get outside employment to subsidize. She did not live up to the standards set by his second wife, who was an outgoing social person who loved the arts and entertaining guests. He was so down on Emma that he was going to take her out of his will when he turned eighty. Lucky for her, he had a heart attack and died just a few months before. She didn't know how much he was really worth until the will was read. She realized that she was now worth millions of dollars. Now she could spend money on herself and her children. She sent her children to college and even started enjoying the life that she could not experience while married to Bucknell. She and her daughter, Mary, began a new venture in collecting artwork, traveling to Europe on many occasions. There is where Mary met an official of the Italian government, fell in love and married. That gave Emma more excuses to travel to Europe.

It was on that fateful day, in April 1912, when she boarded the brand new steamship, RMS Titanic, with a feeling of apprehension. She was



### The Making of a Town by Fay Lyon

With the slow but continuous encroachment of white settlers into Indian territory in Central N.Y., several treaties were made between the Indians and the federal and state governments. Thousands of acres, in N.Y. State, were ceded to the English Crown before the Revolutionary War.

With several treaties being made from 1783 to 1795 between the Iroquois and George Clinton, Governor of New York, it was the treaty of 1788 signed at Fort Schuyler (Ulrica), N.Y. that ceded to the state most of the Oneida Indian land remaining except what was being held on a reservation for those wishing to stay in their homeland.

In 1789, the state legislature passed an act directing Simeon Dewitt, the state's Surveyor General, to lay out and survey some of the lands that were purchased from the Oneidas in the latest treaty. These lands included the Twenty Towns, of which Township No. 1 (Nelson) was part. Another part was the Gore, a tract of land that was a result of a survey mistake, making a narrow strip between the west line of the Twenty Towns and the east side of the Onondaga county line. The Road Township (south Cazenovia) was the third piece to be added. A small plot of land below the Gore was added, and afterwards, part of New Petersburg (north of the Road Township) was attached to the sum bringing the total close to 120,000 acres. In 1790, Simeon Dewitt declared that the Twenty Townships were surveyed and ready to be put up for sale. The average size of each township was about 24,000 acres with some wide variations. Township No. 1 was one of the larger ones with 27,187 acres. Purchases in the Twenty Townships were made possible by a legislative act passed on March 22, 1791, Alexander Webster and two others bought the No. 1 Township with the last payment due in 1793. Very shortly after, they sold it to John Lincklaen who was working for the Holland Land Company's general agent, Theophile Cazenove,



The twenty townships outlined in blue.

who represented a group of Dutch bankers speculating in increasing land values mainly in New York and Pennsylvania. After Mr. Lincklaen purchased the rest of the property previously noted, he called his new enterprise "The Cazenovia Establishment" naming it after the general agent, Cazenove. The term "the road township" was possibly used by the state signifying that proceeds made from the sale of lots would provide funds to finance the building of roads in that same area.

Before the town of Cazenovia was formed in 1795, it was part of the town of Whitesboro in Herkimer County. It was not until 1798 that Chenango County was split off from Herkimer County. In 1806, a new county of Madison replaced part of Chenango, and in 1807, the town of Nelson, along with a number of others found themselves in Madison County. Until then, Nelson was essentially part of the Cazenovia Establishment.

John Lincklaen immediately put the land up for sale after hiring Nathaniel Locke to survey the town into 185 lots of approximately 150 acres each. He sent flyers out across the countryside proclaiming the virtues of his newly purchased land. When he arrived in Cazenovia, in early summer of 1793, he met two men from Vermont, who came to explore the new land for their families. Originally from Connecticut, these families were part of a group of pioneers who were searching for more fertile land. The rocky Vermont soils were unsatisfactory for agriculture, and the group may have heard about the new area being put up for sale when Lincklaen traveled through their area a year previously.

Most of our history books maintain that about 20 families from Vermont ventured forth in 1794 to Township No. 1. This certainly might be true, however Rebecca Fay, the daughter of David Fay, said that about 12 families (or heads of families) came in the Fall of 1793 and bought their lots. This might also be true because some of the lots were sold to those same Vermont pioneers that fall. She explained that Jedidiah Jackson, one of the people who met with Lincklaen early in 1793 had his log cabin built while waiting for his family the following year. He kept a tavern (near where Robin Hill Farm is today on Putnam Rd.), and built a building large enough for both a store and a school. His daughter Lucinda was the schoolteacher. He also built a sawmill with a mill dam and a forge.

Some of Lincklaen's teamsters and axemen bought lots in the town. Why not? He had a "special" going on. The first ten buyers paid a dollar an acre, considered very liberal terms. Even subsequent purchasers got good terms. Lincklaen built saw mills, a blacksmith shop, a distillery and a brewery (a



### The Stone Bridge of Nelson by Laine Gilmore

When you travel the Cherry Valley Turnpike today, it conjures up images of eras gone past all across New York State. We can see the Teepee Gift Shop, still up and running in Cherry Valley, but all that's left of the Petrified Dinosaurs is the old sign, as the building slowly disintegrates into the surrounding trees and other plant growth.

Here in Nelson, if you are heading east, from the top of the west hill, it's easy to see remnants of the "Old Route 20" just before you get to Thomas Rd. But actually, the "Old Route 20" was located where it is right now, and the portion of the road we tend to call the "Old Route 20" was built to accommodate early autos that couldn't climb the steep part of Rte. 20 as we know it today. Later it was moved back to its original route, as it is today.

What many people don't know, is the automobile also had a hard time on the hill heading east on the east part of town. About 1/2 mile before Richards Road, the road dipped off to the right and down along the creek. Most people don't venture onto Martin Rd which is a quick right hand turn off of Richards Rd, just as you exit Rte. 20. Why? Because there are only two houses. One on the corner of Richards and Martin Roads, and one on the right side of Martin Rd. You would likely only go on that road to visit the families living there.



The Stone Bridge as it looks today.

So, at the invitation of Judy and Mike Allen, who live on Martin Rd., (Judy being the daughter of Carl "Freddie" and Doris Martin who moved to the one existing house on Martin Rd. in the early 1960s), a crew of ENHS members took a nice walk with Mike Allen along the "Old Rte. 20" (Martin Rd.) in search of the famed Old Stone Bridge that crossed that section of Rte. 20.

### But, first a little history of the Stone Bridge

The area about which we are writing (Martin Rd.), has a westerly flowing creek which originates on the north side of Rte. 20, crosses that highway where Martin Rd. dead ends (today), and continues on the south side of Rte. 20 through "downtown" Nelson, and empties into Chittenango Creek. This is where the stone bridge was constructed. Between the first construction of the Cherry Valley Turnpike in the area of Nelson (finished about 1811) and 1867, this creek area was likely first crossed by fording the creek; later, wooden bridges would have been built to cross the creek and then rebuilt again and again when they would wash away. In 1868, it was decided to build a stone arch bridge, covered in earth, in which to cross the creek.

All of the stone work was done by James T. Jones, a stone mason and a Civil War Veteran and member of Co F, 176th, N.Y. According to descendants, James T. Jones was born in 1826 in Wales, James Jones and his wife, Mary had nine children. James T. Jones is also credited with building the foundation of the



Clifford Jones and William D. Jones, grandsons of the original builder, James T. Jones, stand at the bridge c. 1950 (Cazenovia Republic article). Notice the many feet of fill above the bridge from 30 years of repairs.