



## Cultural Resources Correspondence Summary

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

### Summary of Cultural Resources-Related Correspondence

Date	Sender	Recipient(s)	Content
June 15, 2021	EDR on behalf of Liberty Renewables	Cayuga Nation (CN), Onondaga Nation (ON)	Project introduction letter and maps (EDR, 2021a).
June 16, 2021	EDR on behalf of Liberty Renewables	NYSHPO	Formal consultation initiated with NYSHPO via the Cultural Resources Information System (CRIS) website (EDR, 2021b).
June 21, 2021	NYSHPO	EDR, Liberty Renewables	Response to initial request for consultation and request for a Phase IA Archaeological Survey (NYSHPO, 2021a).
July 2, 2021	NYSHPO	EDR, Liberty Renewables	Response to initial request for consultation and request for a historic resources survey work plan (NYSHPO, 2021b).
August 30, 2021	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IA Archaeological Survey, Agricola Wind Project, Towns of Venice, Scipio, and Moravia, Cayuga County, New York</i> (EDR, 2021c).
September 9, 2021	NYSHPO	EDR, Liberty Renewables, ORES	Request for revisions to the Phase IA Archaeological Survey (NYSHPO, 2021c).
May 22, 2023	EDR on behalf of Liberty Renewables	NYSHPO	Submission of Revised <i>Phase IA Archaeological Survey</i> (EDR, 2023).
May 30, 2023	NYSHPO	EDR, Liberty Renewables	Approval of the <i>Revised Phase IA Archaeological Survey</i> (NYSHPO, 2023).

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

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

## References Cited

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



June 15, 2021

**Clint Halftown**

Nation Representative  
[REDACTED]  
[REDACTED]  
[REDACTED]

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

Dear Mr. Halftown:

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

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

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

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

establishes the procedural and substantive requirements for a Siting Permit Application under Section 94-c.

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

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

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

Mr. Andy MacCallum  
President  
Liberty Renewables Inc.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[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 (fall 2021)
- Phase IB Archaeological Fieldwork (anticipated to be conducted fall 2021 or spring 2022)
- Historic Resources Survey Fieldwork (fall 2021)
- Historic Resources Survey Report (spring 2022)
- Phase IB Archaeological Survey Report (spring 2022)
- Siting Permit Application submitted to ORES (2022)
- U.S. Army Corps of Engineers wetland permit review/Section 106 review (2022)

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Grant Johnson', with a long horizontal stroke extending to the right.

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

Attachments:

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



June 15, 2021

**Anthony Gonyea**

Faithkeeper

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

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

Dear Mr. Gonyea:

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

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

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

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

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

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

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

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

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

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

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- Phase IA Historic Resources Survey Methodology (summer 2021)
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- Siting Permit Application submitted to ORES (2022)
- U.S. Army Corps of Engineers wetland permit review/Section 106 review (2022)

Anthony Gonyea, Onondaga Nation  
Agricola Wind Project – Cultural Resources Surveys and Environmental Review  
June 15, 2021

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Grant Johnson', with a long horizontal flourish extending to the right.

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

Attachments:

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

CC: Alma Lowry, Attorney  
Joe Heath, Attorney



**Parks, Recreation,  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

June 21, 2021

Andrew Roblee  
Project Architectural Historian  
Environmental Design & Research



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

Dear Andrew Roblee:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (5NYCRR Part 617).

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

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

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

Sincerely,

Tim Lloyd, Ph.D.  
Scientist - Archaeology



via e-mail only





Close

View and/or Address a Response

Project 21PR03987: Agricola Wind Project (PUU8J4QA3D3N)

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
Tim Lloyd	Archaeology	Andrew, OPRHP concurs with EDR's proposed archaeological investigation (see attached letter). Please review the specific information request(s) below and click the Process button to respond to each request.
James Carter	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	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	Tim Lloyd	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	Tim Lloyd	Archaeology	Request a New Attachment, Photo, or Survey for this Consultation Project		Attachment	Please submit a shapefile showing the project components
	Information Requested	James Carter	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 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 James Carter at james.carter@parks.ny.gov with any questions. Thank you.



**Parks, Recreation,  
and Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

September 9, 2021

Andrew Roblee  
Project Architectural Historian  
Environmental Design & Research



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

Dear Andrew Roblee:

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

We have reviewed the report of the Phase IA archaeological investigation (21SR00525). OPRHP requests the following report revisions.

On report Page 27, EDR states

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

1. Portions of the Facility Area within 61 meters (200 feet) of a historically map-documented structure.
2. Portions of the Facility Area within 100 meters (328 feet) of permanent water (rivers, streams, wetlands, ponds and lakes, and hydric soils) and on slopes equal to or less than 12 percent.
3. Portions of the Facility Area within 305 meters (1,000 feet) of known archaeological sites (defined as NYSHPO or NYSM sites).

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

Andrew Roblee  
September 9, 2021  
Page 2

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

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

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

Sincerely,



Tim Lloyd, Ph.D.  
Scientist - Archaeology

via e-mail only



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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

May 30, 2023

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



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

Dear Grant Johnson:

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

Thank you for revising the report of the Phase IA archaeological investigation (21SR00525), as requested in the OPRHP's letter dated September 9, 2021. The OPRHP concurs with the report recommendations for Phase IB archaeological testing in areas of high archaeological sensitivity.

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

Sincerely,

Tim Lloyd, Ph.D.  
Scientist - Archaeology



via e-mail only

June 13, 2024

**Clint Halftown**

Nation Representative



**Chief Sam George**

Cayuga National Council



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

Dear Mr. Halftown and Mr. George:

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

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

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

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

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

Meg Lee  
Permitting Manager  
Liberty Renewables Inc.



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

The Phase IA Archaeological Survey is available as a PDF document for review and comment on a SharePoint site at this link: [2023-05 Agricola Wind Phase IA Archaeological Survey.pdf](#)

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

Upcoming anticipated project milestones include the following:

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Peter A. Sittig".

Peter Sittig  
EDR Archaeology Project Manager

**Attachments:**

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

**Copy to (via email):**

Tim Lloyd, New York State Historic Preservation Office

Bradley Russell, New York State Historic Preservation Office



**Figure 1. Regional Facility Location**



## Agricola Wind Project

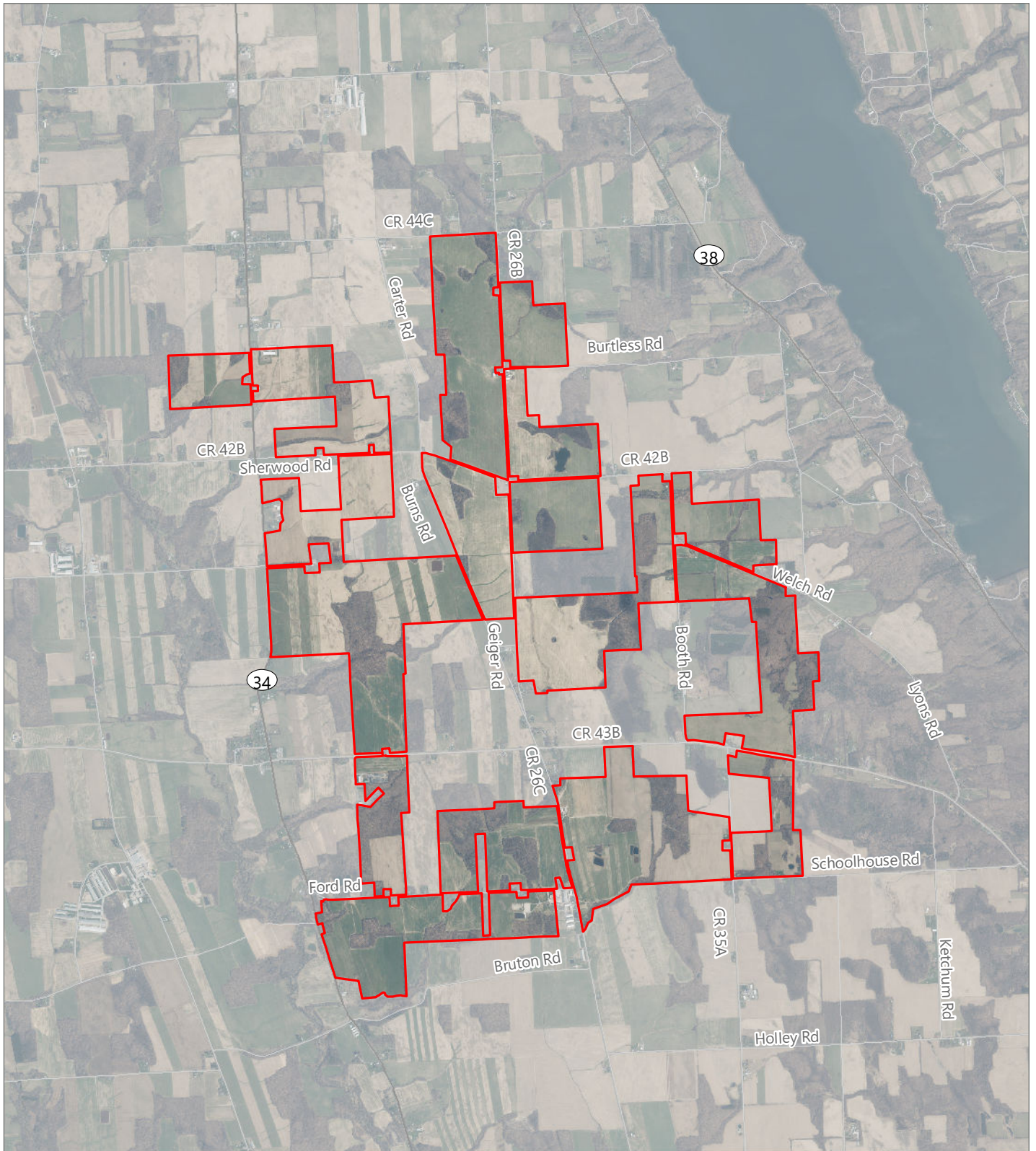
Towns of Venice, Scipio, and Moravia  
Cayuga County, New York



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**Figure 2. Facility Site**

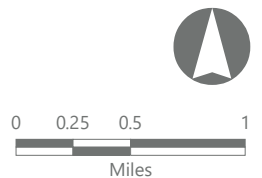


## Agricola Wind Project

Towns of Venice and Scipio,  
Cayuga County, New York

*Phase 1A Archaeological Survey*

Facility Site



June 13, 2024

**Anthony Gonyea**

106 Representative



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

Dear Mr. Gonyea:

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

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

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

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

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

Meg Lee  
Permitting Manager  
Liberty Renewables Inc.



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

The Phase IA Archaeological Survey is available as a PDF document for review and comment on a SharePoint site at this link: [2023-05 Agricola Wind Phase IA Archaeological Survey.pdf](#)

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

Upcoming anticipated project milestones include the following:

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Peter A. Sittig".

Peter Sittig  
EDR Archaeology Project Manager

**Attachments:**

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

**Copy to (via email):**

Tim Lloyd, New York State Historic Preservation Office

Bradley Russell, New York State Historic Preservation Office



**Figure 1. Regional Facility Location**



## Agricola Wind Project

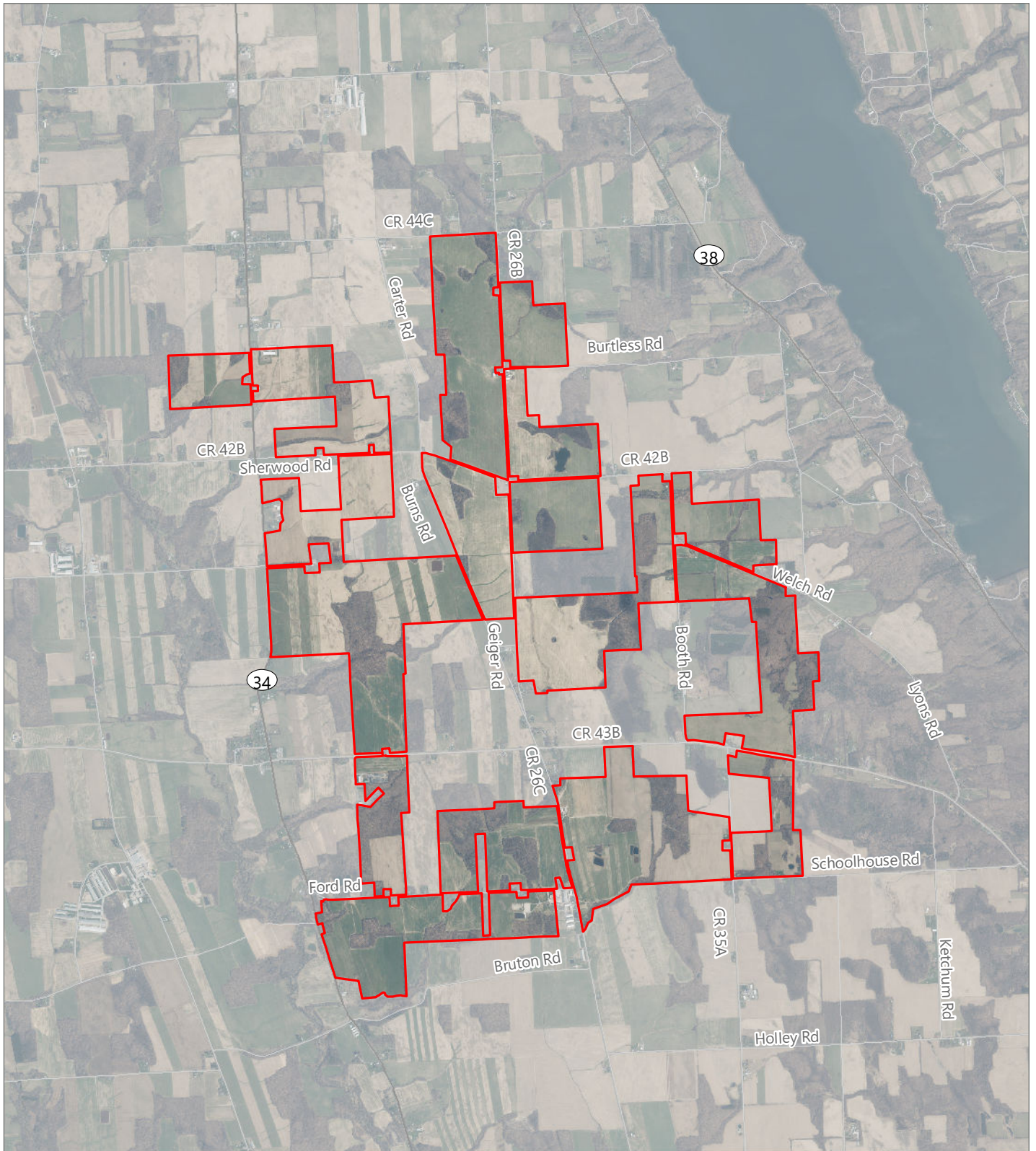
Towns of Venice, Scipio, and Moravia  
Cayuga County, New York



0 2.5 5 10  
Miles



**Figure 2. Facility Site**

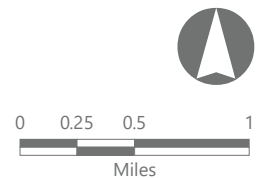


## Agricola Wind Project

Towns of Venice and Scipio,  
Cayuga County, New York

*Phase 1A Archaeological Survey*

Facility Site



July 9, 2024

**Clint Halftown**

Nation Representative



**Chief Sam George**

Cayuga National Council



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

Dear Mr. Halftown and Chief George:

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

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

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

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

Meg Lee  
Permitting Manager  
Liberty Renewables Inc.



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

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

Upcoming anticipated project milestones include the following:

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Peter A. Sittig".

Peter Sittig  
EDR Archaeology Project Manager



**Attachments:**

- Phase IB Archaeological Report

**Copy to (via email):**

Tim Lloyd, New York State Historic Preservation Office

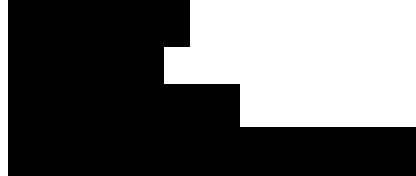
Bradley Russell, New York State Historic Preservation Office

Kristy Primeau, Office of Renewables Energy Siting

July 9, 2024

**Anthony Gonyea**

106 Representative



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

Dear Mr. Gonyea:

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

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

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

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

Meg Lee  
Permitting Manager  
Liberty Renewables Inc.



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

The Phase IB Archaeological Survey is available as a PDF document for review and comment on a SharePoint site at this link: [2024-07-05\\_Agricola Wind\\_Phase IB Archaeological Survey Report.pdf](#)

Upcoming anticipated project milestones include the following:

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Peter A. Sittig".

Peter Sittig  
EDR Archaeology Project Manager

**Attachments:**

- Phase IB Archaeological Survey Report

**Copy to (via email):**

Tim Lloyd, New York State Historic Preservation Office

Bradley Russell, New York State Historic Preservation Office


Kristy Primeau, Office of Renewable Energy Siting

Project 21PR03987: Agricola Wind Project (HSL59P9T94T4)

View Project

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

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

Information Requests							
Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	Virginia Bartos	Survey and Evaluation	Request a New Attachment for an Existing Survey	Historic Resources Survey, Agricola Wind Project, Towns of Venice and Sciplo, Cayuga County, New York (24SR00220)	Attachment	Please upload the Survey Report after the Trekker Surveys are complete.



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

**KATHY HOCHUL**  
Governor

**RANDY SIMONS**  
Commissioner *Pro Tempore*

July 17, 2024

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



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

Dear Grant Johnson:

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

We have reviewed the report of the Phase IB archaeological survey (No. 24SR00350). The report states that a total of 10 archaeological sites were identified, all of which represent late nineteenth to twentieth century artifact deposits. However, due to the association of two artifact deposits with the same map documented structure, the OPRHP combined EDR's A33-HAS-01 and A33-HAS-02 into one site. For the same reason, OPRHP combined EDR's B01-HAS-01 and B01-HAS-02 into one site. The eight sites and OPRHP's recommendations are listed below.

<b><u>Site Name</u></b>	<b><u>OPRHP No.</u></b>	<b><u>Site Type</u></b>	<b><u>Recommendation</u></b>
A01-HAS-01	01122.000024	Historic Period Deposit	Avoid or Phase II
A01-HAS-02	01122.000025	Historic Period Deposit	Avoid or Phase II
A17-HAS-01	01122.000026	Historic Period Deposit	Avoid or Phase II
C01-HAS-01	01122.000027	Historic Period Deposit	Avoid or Phase II
F01-HAS-01	01122.000028	Historic Period Deposit	Avoid or Phase II
A33-HAS-01 & 02	01115.000059	Historic Period Deposits	Avoid or Phase II
B01-HAS-01 & 02	01115.000060	Historic Period Deposits	Avoid or Phase II
G01-HAS-01	01115.000061	Historic Period Deposit	Avoid or Phase II

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

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

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

Sincerely,



Tim Lloyd, Ph.D.  
Scientist - Archaeology

via e-mail only



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

**KATHY HOCHUL**  
Governor

**RANDY SIMONS**  
Commissioner *Pro Tempore*

September 10, 2024

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



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

Dear Grant Johnson:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. Such impacts must be considered as part of the environmental review of the project pursuant to Executive Law Section 94-c and its implementing regulations (19 NYCRR Part 900).

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

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

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

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meaningful mitigation measures, we recommend reaching out to a variety of history-based organizations within the impacted communities. The plan should establish specific preservation/history project and/or funding intended to offset what this office believes will be significant visual impacts associated with this undertaking. Once a mitigation plan is developed and agreed upon, it will be memorialized and outlined in §900-2.10 *Exhibit 9 Revised*, and included in the final Cultural Resource Avoidance, Minimization and Mitigation Plan (CRAMMP) submitted to the Office of Renewable Energy Siting for review and approval in compliance with 19 NYCRR §§ 900-10.1(a) and 900-10.2(g).

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

Sincerely,



Robyn Sedgwick  
Historic Site Restoration Coordinator

### Appendix A

Identification Number	Address	Municipality	County	Resource Name and/or Description	Source	Existing S/NRHP Eligibility Status (NYSHPO)	S/NRHP Eligibility Recommendation	OPRHP Determination
90NR00099	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	National Historic Landmark	National Historic Landmark	listed
08NR05844	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
05NR05510	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
05NR05509	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
94NR00534	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
08NR05843	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
07NR05805	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
95NR00879	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00788	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00789	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed

Division for Historic Preservation

95NR00790	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00787	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00796	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00797	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00798	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00793	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00794	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00795	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	N/A	listed
95NR00792	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
95NR00799	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
95NR00813	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
95NR00791	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed

**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> •

92NR00358	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
92NR00357	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Listed	S/NRHP-Listed	listed
USN 01105.000001	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Eligible (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01106.000036	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Eligible (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01106.000031	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Eligible (NYSHPO Determined)	N/A	eligible
USN 01106.000074	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Eligible (NYSHPO Determined)	N/A	eligible (based on historic SHPO determination; no documentation or photographs available for referral)
USN 01115.000008	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Eligible (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01108.000070	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP-Eligible (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible

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USN 01122.000019					Previously Identified	S/NRHP- Eligible (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01146.000138					Previously Identified	S/NRHP- Eligible (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01146.000146					Previously Identified	S/NRHP- Eligible (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01146.000276					Previously Identified	S/NRHP- Eligible (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01146.000024					Previously Identified	S/NRHP- Eligible Resource (NYSHPO Determined)	N/A	eligible
USN 01146.000139					Previously Identified	S/NRHP- Eligible Resource (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01146.000180					Previously Identified	S/NRHP- Eligible Resource (NYSHPO Determined)	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01146.000027					Previously Identified	S/NRHP- Eligible Resource (NYSHPO Determined)	N/A	eligible
USN 01146.000026					Previously Identified	S/NRHP- Eligible Resource (NYSHPO Determined)	N/A	eligible
USN 01146.000185					Previously Identified	S/NRHP- Eligible Resource (NYSHPO Determined)	N/A	eligible

USN 01146.000100	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP- Eligible Resource (NYSHPO Determined)	N/A	eligible
USN 01146.000170	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP- Eligible Resource (NYSHPO Determined)	N/A	eligible
USN 01120.000004	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01106.000001	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01106.000006	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01106.000005	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01106.000007	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
USN 01108.000104	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	N/A	Eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP Eligibility Undetermined (EDR Recommended)	eligible

USN 01108.000014	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	N/A	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	N/A	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP Eligibility Undetermined (EDR Recommended)	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP Eligibility Undetermined (EDR Recommended)	eligible
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N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
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Division for Historic Preservation


















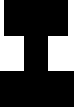






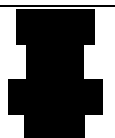


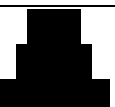
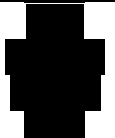



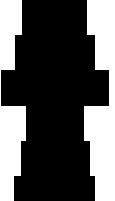



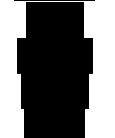



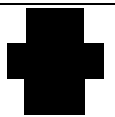



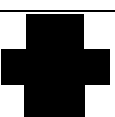


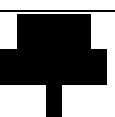
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N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
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N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible

Division for Historic Preservation

N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Previously Identified	S/NRHP Eligibility Undetermined	S/NRHP-Eligible (EDR Recommended)	eligible
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N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Locally Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible in district
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Locally Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
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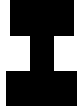

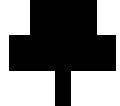
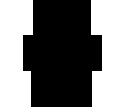
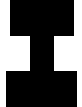

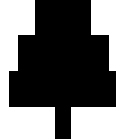



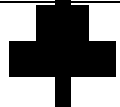

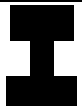

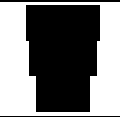

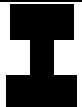



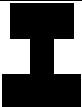


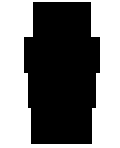



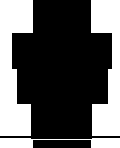















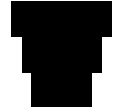



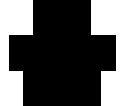
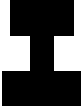


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N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible

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N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
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N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible (in Poplar Ridge District)
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N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
N/A					Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible

N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	eligible (in CRIS)
N/A	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Newly Identified	N/A	S/NRHP-Eligible (EDR Recommended)	Eligible

September 25, 2024

**Clint Halftown**

Nation Representative



**Chief Sam George**

Cayuga National Council



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

Dear Mr. Halftown and Chief George:

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

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

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

Upcoming anticipated project milestones include the following:

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



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

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

Sincerely,

A handwritten signature in cursive script that reads "Peter A. Sittig".

Peter Sittig

**EDR** Archaeology Project Manager

**Attachment A:**

- Phase IB Archaeological Report Addendum

**Copy to (via email):**

Tim Lloyd, New York State Historic Preservation Office

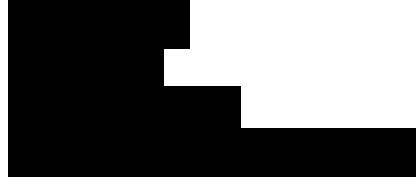
Bradley Russell, New York State Historic Preservation Office

Kristy Primeau, Office of Renewables Energy Siting

September 25, 2024

**Anthony Gonyea**

106 Representative



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

Dear Mr. Gonyea:

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

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

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

Upcoming anticipated project milestones include the following:

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Peter A. Sittig".

Peter Sittig

EDR Archaeology Project Manager

**Attachment A:**

- Phase IB Archaeological Report Addendum

**Copy to (via email):**

Tim Lloyd, New York State Historic Preservation Office

Bradley Russell, New York State Historic Preservation Office

Kristy Primeau, Office of Renewables Energy Siting



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

**KATHY HOCHUL**  
Governor

**RANDY SIMONS**  
Commissioner *Pro Tempore*

October 8, 2024

Grant Johnson  
Senior Project Manager, Historic Preservation



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

Dear Grant Johnson:

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

We have reviewed the Phase IB Archaeological Survey Addendum Memo (No. 24SR00519). The addendum archaeological survey was conducted due to a change in the project plans. One archaeological site was identified during the addendum survey, consisting of an artifact deposit associated with a former structure dating from the mid-nineteenth to early-twentieth century (Site No. 01122.000062). The OPRHP concurs with the report recommendation that further disturbance of the site be avoided. If avoidance is not possible, then a Phase II site evaluation should be conducted.

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

The OPRHP has also reviewed the Archaeological Avoidance Plan (the Plan), dated September 19, 2024. The Plan addresses the eight archaeological sites identified during the initial Phase IB survey, and the one site identified during the addendum Phase IB survey, for a total of nine archaeological sites. The Plan proposes the establishment of a 50-foot buffer around each of the archaeological sites, and the placement of protective fencing with the label "Environmentally Sensitive Area – No Access." The OPRHP concurs with that recommendation, but we also

recommend that the archaeological sites be identified on project plans with the same label: Environmentally Sensitive Area – No Access (i.e., do not label them as archaeological sites). The Plan also recommends the creation and implementation of a cultural resources Unanticipated Discovery Plan (UDP). The OPRHP concurs with that recommendation.

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

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

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

Sincerely,



Tim Lloyd, Ph.D.  
Scientist - Archaeology

via e-mail only