

Summary of Cultural Resources-Related Correspondence

Date	Sender	Recipient(s)	Content
June 15, 2021	EDR on behalf of Liberty Renewables	Oneida Indian Nation (OIN)	Project introduction letter and maps for Hoffman Falls Wind Project (EDR, 2021a).
June 15, 2021	EDR on behalf of Liberty Renewables	Oneida Indian Nation (OIN)	Project introduction letter and maps for Blue Hill Wind Project (EDR, 2021b).
June 16, 2021	EDR on behalf of Liberty Renewables	NYSHPO	Formal consultation initiated with NYSHPO via the Cultural Resources Information System (CRIS) website for Hoffman Falls Wind Project (EDR, 2021c).
June 16, 2021	EDR on behalf of Liberty Renewables	NYSHPO	Formal consultation initiated with NYSHPO via the CRIS website for Blue Hill Wind Project (EDR, 2021d).
June 21, 2021	NYSHPO	EDR, Liberty Renewables	Response to initial request for consultation and request for a Phase IA Archaeological Survey for Hoffman Falls Wind Project (NYSHPO, 2021a).
June 21, 2021	NYSHPO	EDR, Liberty Renewables	Response to initial request for consultation and request for a Phase IA Archaeological Survey for Blue Hill Wind Project (NYSHPO, 2021b).
July 2, 2021	NYSHPO	EDR, Liberty Renewables	Response to initial request for consultation and request for a historic resources survey work plan for Hoffman Falls Wind Project (NYSHPO, 2021c).
July 2, 2021	NYSHPO	EDR, Liberty Renewables	Response to initial request for consultation and request for a historic resources survey work plan for Blue Hill Wind Project (NYSHPO, 2021d).
July 9, 2021	OIN	EDR	OIN inquired if federal permits or assistance is anticipated (OIN, 2021a).

Date	Sender	Recipient(s)	Content
July 20, 2021	EDR on behalf of Liberty Renewables	OIN	EDR replied that USACE Nationwide Permit is assumed (EDR, 2021e).
July 21, 2021	OIN	EDR	OIN inquired if the Facility Area could be amended to avoid the OIN-owned parcel it currently includes, and if not, why it needs to be included (OIN, 2021b).
August 12, 2021	EDR on behalf of Liberty Renewables	OIN	EDR clarified that the Facility Area just depicts the general project area and that no components are proposed to be sited on OIN-owned parcels (EDR, 2021f).
August 30, 2021	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IA Archaeological Survey, Blue Hill Wind Project, Town of Eaton, Madison County, New York</i> (EDR, 2021g).
September 7, 2021	EDR on behalf of Liberty Renewables	OIN	Meeting/call to discuss anticipated cultural resources studies and environmental permitting review for the Facility. Liberty Renewables reiterated that the Facility Area just depicts the general project area and that no components are proposed to be sited on OIN-owned parcels. Regardless, OIN requested that the Facility Area be amended to exclude OIN-owned parcels. OIN also requested a copy of the Phase IA Archaeological Survey and that a project introduction letter be sent to OIN leadership (EDR, 2021h).
September 9, 2021	NYSHPO	EDR, Liberty Renewables	Request for revisions to Blue Hill Phase IA report (NYSHPO, 2021e).
March 21, 2022	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IA Archaeological Survey (Revised), Blue Hill Wind Project, Town of Eaton, Madison County, New York</i> (EDR, 2022).
April 14, 2022	NYSHPO	EDR, Liberty Renewables	Concurrence with revised Phase IA Archaeological Survey (NYSHPO, 2022).

Date	Sender	Recipient(s)	Content
January 31, 2023	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IA Archaeological Survey, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (EDR, 2023a).</i>
February 15, 2023	NYSHPO	EDR, Liberty Renewables	Concurrence with Phase IA report and request for Phase IB survey (NYSHPO, 2023a).
May 5, 2023	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IA Archaeological Survey, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (EDR, 2023b).</i>
May 16, 2023	NYSHPO	EDR, Liberty Renewables	Concurrence with Phase IA report and request for Phase IB survey (NYSHPO, 2023b).
October 27, 2023	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IA Historic Resources Survey Methodology, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (EDR, 2023c).</i>
November 17, 2023	NYSHPO	EDR, Liberty Renewables	Concurrence with Phase IA Historic Resources Survey Methodology and request for historic resources Survey (NYSHPO, 2023c).
December 13, 2023	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IB Archaeological Survey, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (EDR, 2023d).</i>
December 22, 2023	EDR on behalf of Liberty Renewables	NYSHPO	<i>Phase IB Archaeological Survey Addendum Memo, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (EDR, 2023e).</i>
January 3, 2024	EDR on behalf of Liberty Renewables	NYSHPO	<i>Historic Resources Survey Report, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (EDR, 2024a).</i>
January 10, 2024	NYSHPO	EDR, OIN	NYSHPO forwarding <i>Phase IA Archaeological Survey, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York</i> and <i>Phase IB Archaeological Survey, Hoffman Falls Wind Project, Towns of Eaton, Fenner, Nelson, and Smithfield, Madison County, New York (NYSHPO, 2024a).</i>

Date	Sender	Recipient(s)	Content
January 26, 2024	EDR on behalf of Liberty Renewables	NYSHPO	Archaeological Site Avoidance Plan (EDR, 2024b).
February 8, 2024	NYSHPO	EDR, Liberty Renewables	Response to <i>Historic Resources Survey Report</i> and request for additional information (NYSHPO, 2024b).
February 9, 2024	NYSHPO	EDR, Liberty Renewables	Concurrence with <i>Phase IB Archaeological Survey</i> and <i>Phase IB Archaeological Survey Addendum Memo</i> . Request for revisions to Archaeological Site Avoidance Plan (NYSHPO, 2024c).
February 12, 2024	EDR on behalf of Liberty Renewables	NYSHPO	Revised Archaeological Site Avoidance Plan (EDR, 2024d).

References Cited

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

EDR. 2021b. RE: Proposed Blue Hill Wind Project, Cultural Resources Surveys and Environmental Review. Correspondence from EDR to Oneida Indian Nation. Via email, June 15, 2021.

EDR. 2021c. Request for Consultation, Hoffman Falls Wind Project, Towns of Fenner, Nelson, and Smithfield, Madison County, New York. Submitted to NYSHPO by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. June 16, 2021.

EDR. 2021d. Request for Consultation, Blue Hill Wind Project, Town of Eaton, Madison County, New York. Submitted to NYSHPO by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. June 16, 2021.

EDR. 2021e. RE: Blue Hill and Hoffman Falls Wind Projects. Correspondence from EDR to Oneida Indian Nation. Via email, July 20, 2021.

EDR. 2021f. RE: Blue Hill and Hoffman Falls Wind Projects. Correspondence from EDR to Oneida Indian Nation. Via email, August 12, 2021.

EDR. 2021g. *Phase IA Archaeological Survey, Blue Hill Wind Project, Town of Eaton, Madison County, New York*. Prepared for Liberty Renewables by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. August 2021.

EDR. 2021h. Hoffman Falls Wind Project. Virtual meeting including EDR, Oneida Indian Nation, and Liberty Renewables. September 7, 2021.

EDR. 2022. *Phase IA Archaeological Survey (Revised), Blue Hill Wind Project, Town of Eaton, Madison County, New York*. Prepared for Liberty Renewables by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY. March 2022.

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 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. May 2023.

EDR. 2023c. Phase IA Historic Resources Survey Methodology, 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. October 2023.

EDR. 2023d. 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. 2023e. 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. 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. 2024b. Re: Hoffman Falls Wind Project, Archaeological Site Avoidance Plan. Correspondence from EDR to NYSHPO. Via CRIS, January 26, 2024.

EDR. 2024c. *Unanticipated Discovery Protocol, 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. 2024d. Re: Hoffman Falls Wind Project, Revised Archaeological Site Avoidance Plan. Correspondence from EDR to NYSHPO. Via CRIS, February 12, 2024.

New York State Office of Parks, Recreation and Historic Preservation (NYSHPO). 2021a. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY, 21PR03989. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, June 21, 2021.

NYSHPO. 2021b. RE: ORES, Blue Hill Wind Project, Town of Eaton, Madison County, NY, 21PR03989. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, June 21, 2021.

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

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

NYSHPO. 2021e. RE: ORES, Blue Hill Wind Project, Town of Eaton, Madison County, NY, 21PR03989. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, September 9, 2021.

NYSHPO. 2022. RE: ORES, Blue Hill Wind Project, Town of Eaton, Madison County, NY, 21PR03989. Review correspondence from Tim Lloyd (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, April 14, 2022.

NYSHPO. 2023a. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Review correspondence from Bradley Russell (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, February 15, 2023.

NYSHPO. 2023b. RE: ORES, Hoffman Falls Wind Project, Towns of Fenner, Nelson and Smithfield, Madison County, NY. 21PR03978. Review correspondence from Bradley Russell (NYSHPO). NYSOPRHP, Waterford, NY. Via CRIS, May 16, 2023.

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 and Jesse Bergevin (OIN). NYSOPRHP, Waterford, NY. Via email, January 10, 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, February 8, 2024.

NYSHPO. 2024c. 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.

Oneida Indian Nation (OIN). 2021a. RE: Blue Hill and Hoffman Falls Wind Projects. Correspondence from Jesse Bergevin (OIN) to EDR. Via email, July 9, 2021.

OIN. 2021b. RE: Blue Hill and Hoffman Falls Wind Projects. Correspondence from Jesse Bergevin (OIN) to EDR. Via email, July 21, 2021.

June 15, 2021

Jesse Bergevin

Historic Resources Specialist

Oneida Indian Nation

2037 Dream Catcher Plaza

Oneida, NY 13421-0662

Email: jbergevin@oneida-nation.org

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

Dear Mr. Bergevin:

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 roughly bound by Cody Road to the north, Pleasant Valley Road to the east, Old State Road to the south, and Nelson Road to the west. The northern half of the Facility Area, within the Towns of Fenner and Smithfield, is located within the Oneida Reservation, as confirmed by the 1794 Treaty of Canandaigua.

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 components¹. This provides flexibility during Facility development to minimize

¹ The Facility Area includes one Oneida Nation-owned parcel held in trust; however, Liberty Renewables Inc. is not proposing to install any Facility components on this land.

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.
90 State Street, Suite 700
Albany, NY 12207
Email: amaccallum@liberty-renewables.com
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:

- 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,

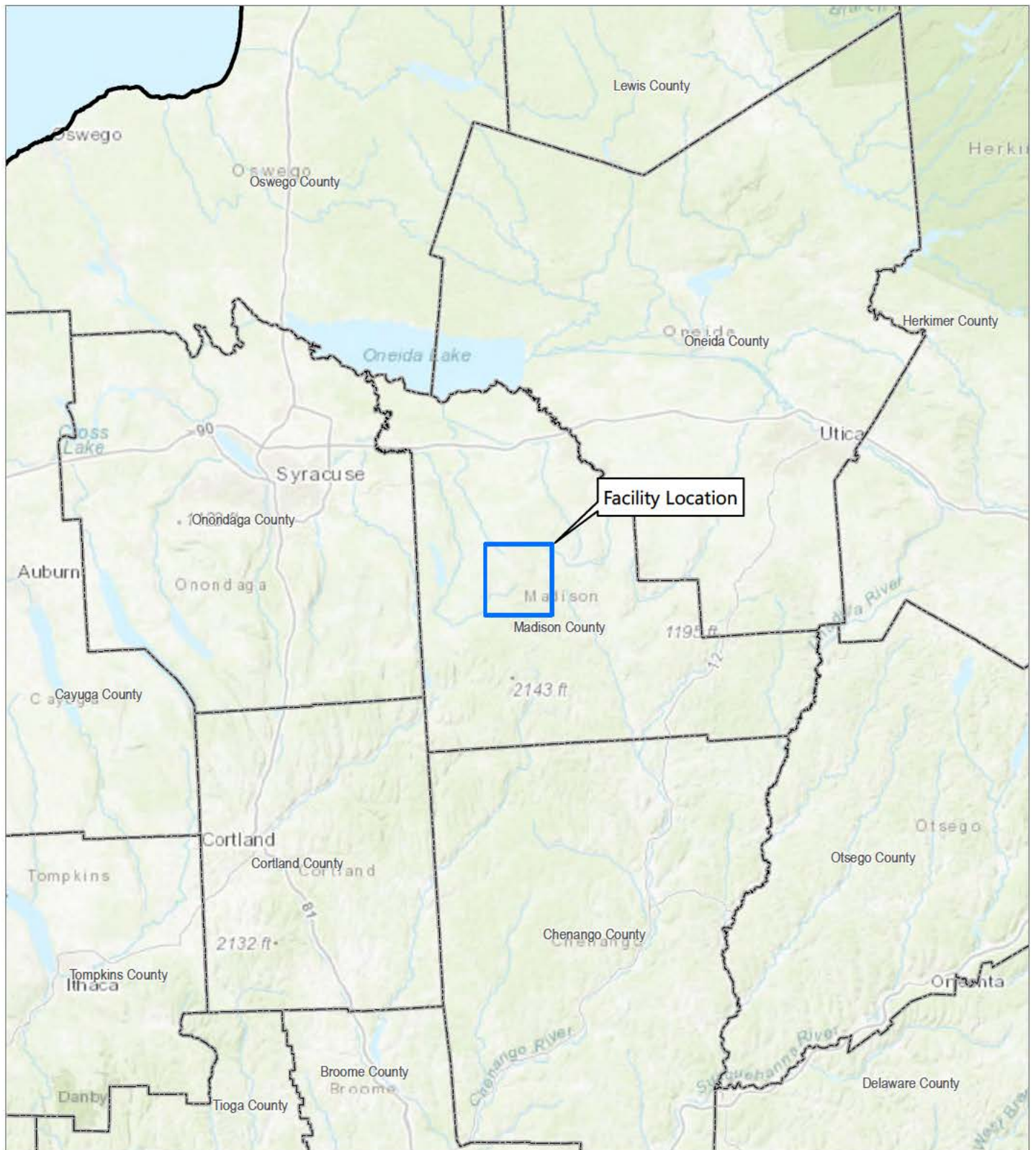
A handwritten signature in black ink, appearing to read 'Grant Johnson', with a long horizontal stroke extending to the right.

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

Attachments:

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

Figure 1. Regional Facility Location



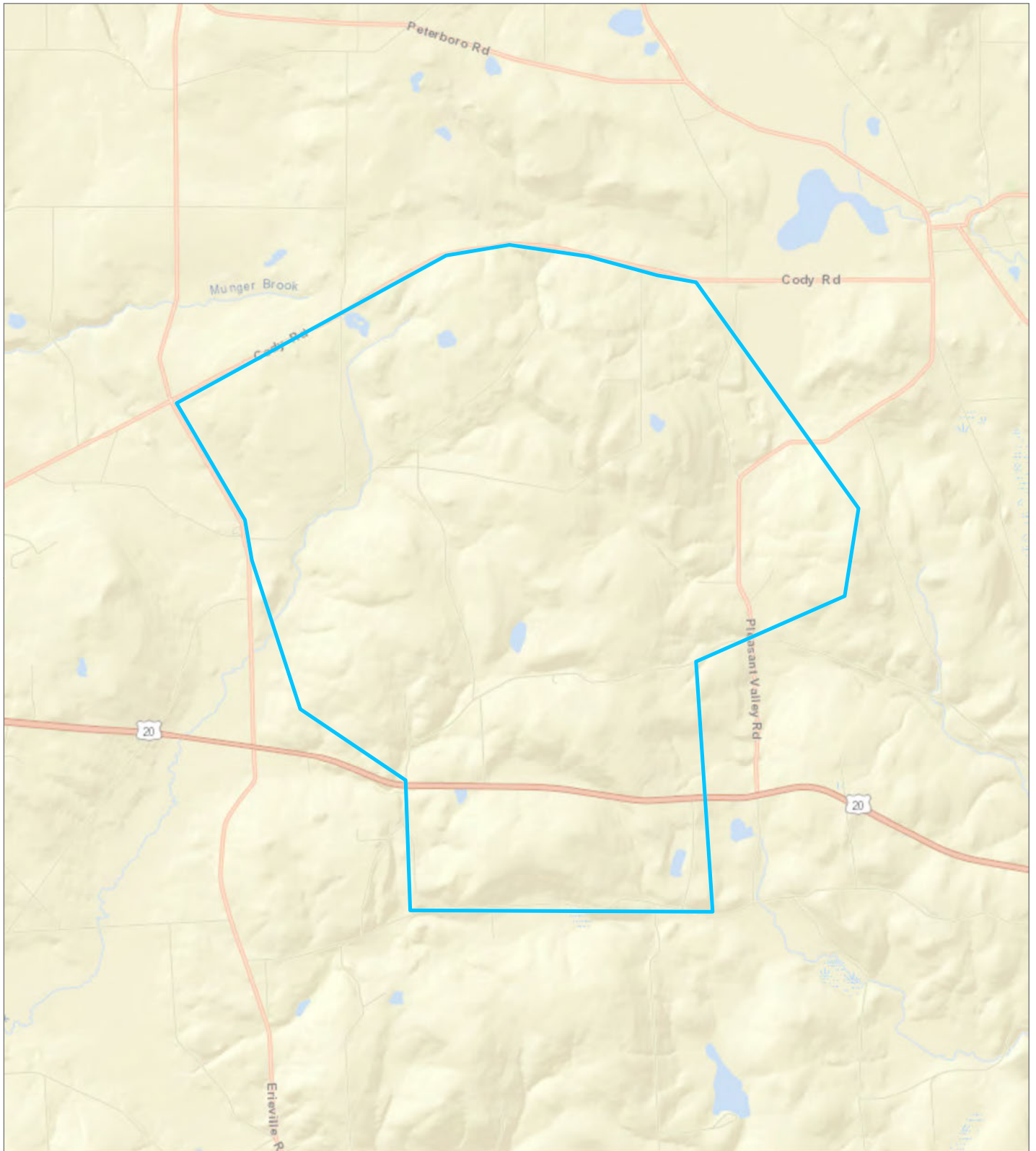
Hoffman Falls Wind Project

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

Cultural Resources Surveys and Environmental Review



Figure 2. Facility Area



Hoffman Falls Wind Project

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

Cultural Resources Surveys and Environmental Review

Facility Area



June 15, 2021

Jesse Bergevin

Historic Resources Specialist
Oneida Indian Nation
2037 Dream Catcher Plaza
Oneida, NY 13421-0662
Email: jbergevin@oneida-nation.org

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

Dear Mr. Bergevin:

Liberty Renewables Inc. is currently planning, designing, and conducting environmental permitting studies for the proposed Blue Hill 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 Town of Eaton 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 1,500-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 Cramer Road to the north, Fearon Road to the east, Rocks Road to the south, and Swamp Road to the west. The Facility Area is located approximately 0.3 miles south of the Oneida Reservation, as confirmed by the 1794 Treaty of Canandaigua.

At this time, we anticipate that the Facility will consist of 5 to 10 wind turbines, with a total generating capacity of up to 27 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.
90 State Street, Suite 700
Albany, NY 12207
Email: amaccallum@liberty-renewables.com
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:

- 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 Blue Hill Wind project can be developed and built in a manner that is respectful of the Oneida Nation's heritage.

Sincerely,

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Grant Johnson

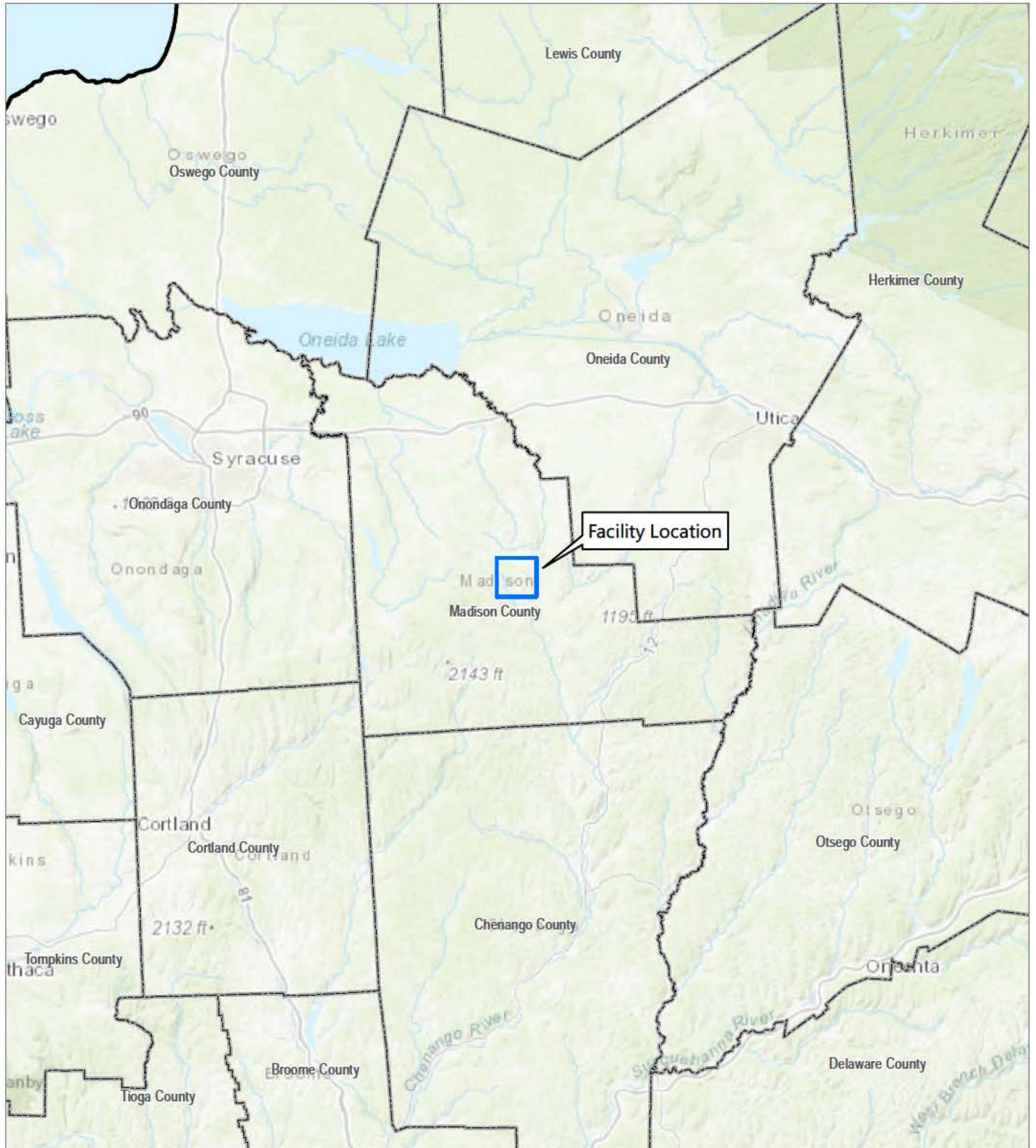
Senior Project Manager – Historic Preservation

Environmental Design & Research

Attachments:

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

Figure 1. Regional Facility Location



Blue Hill Wind Project

Town of Eaton, Madison County, New York

Cultural Resources Surveys and Environmental Review



Figure 2. Facility Area

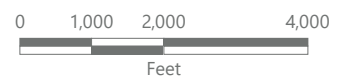


Blue Hill Wind Project

Town of Eaton, Madison County, New York

Cultural Resources Surveys and Environmental Review

Facility Area



Memorandum

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

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

Date: June 16, 2021

Reference: Request for Consultation
Hoffman Falls Wind Project
Towns of Fenner, Nelson, and Smithfield, Madison County, New York

EDR Project No: 21028

On behalf of Liberty Renewables Inc. (the Applicant), Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) prepared this request for consultation for the proposed Hoffman Falls Wind Project (the Facility), a major renewable energy electric generating facility to be located in the Towns of Fenner, Nelson, and Smithfield, Madison County, New York (see Figure 1). The information included in this memorandum is intended to initiate consultation with the New York State Office of Parks, Recreation and Historic Preservation (NYSHPO) to assist in their review of the Facility under Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law, and/or Section 106 of the National Historic Preservation Act, as applicable.

Description of the Facility

The Hoffman Falls Wind Project is a proposed up to 72-megawatt (MW) wind-powered electric generating facility consisting of up to 16 wind turbines within the Towns of Fenner, Nelson, and Smithfield in Madison County, New York. The regional Facility location and Facility Area boundary are depicted on Figures 1 and 2, respectively. The lands being evaluated to host the Facility infrastructure (Facility Area) are rural in nature. Not all land included in the Facility Area will ultimately be developed as part of the Facility. The Facility Area is expected to include approximately 8,384 acres of leased or purchased private land, consisting primarily of open agricultural fields, fallow fields, and large forest stands. The location of the Facility Area and Facility components will be identified in detail in a forthcoming application to the New York State Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law as authorized by Public Service Law Section 162.

Archaeological Surveys

As described in 19 NYCRR § 900-2.10, a Section 94-c application must include:

- (a) *A study of the impacts of the construction and operation of the facility, interconnections and related facilities on archeological/cultural resources within the project impact area¹, including:*
 - (1) *A summary of the nature of the probable impact on any archeological/cultural resources identified, addressing how those impacts shall be avoided or minimized;*
 - (2) *If required pursuant to section 900-1.3(h) of this Part, a Phase IA archeological/cultural resources study for the proposed facility;*
 - (3) *If required pursuant to section 900-1.3(h) of this Part, a Phase IB field study;*
 - (4) *If required by the Phase I study results, as determined pursuant to section 900-1.3(h) of this Part, a Phase II site evaluation study to assess the boundaries, integrity and significance of identified cultural resources;*
 - (5) *An Unanticipated Discovery Plan that shall identify the actions to be taken in the unexpected event that resources of cultural, historical, or archaeological importance are encountered during the excavation process. This plan shall include a provision for work stoppage upon the discovery of possible archaeological or human remains and be prepared by a professional archaeologist in accordance with the New York Archeological Council (NYAC) standards.*

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

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

¹ Defined in 19 NYCRR § 900-2.10 as the project impact area, which is described for the purposes of this memorandum as the Area of Potential Effect.

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

models.³ These include the following requirements for archaeological surveys for wind farm development:

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

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

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

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

EDR reviewed the NYSHPO's Cultural Resource Information System (CRIS) database to identify previously recorded archaeological sites mapped within the Facility Area and a one-mile buffer. A preliminary review of the CRIS website indicates that within one mile of the Facility Area there are:

- A total of one archaeological site for which a formal determination of S/NRHP-eligibility has not been made;
- A total of five New York State Museum (NYSM) sites; and
- A total of four NYSM Areas, two of which are located partially within the Facility Area.

³ NYSHPO. 2020. *Phase IA Archaeological Survey Recommendations/Sensitivity Model*. New York State Historic Preservation Office, Waterford, NY. November 2020.

There are no previously identified archaeological sites within the Facility Area. It is important to note that NYSM Areas are buffered sensitivity areas typically representing informally reported archaeological materials, or areas of general archaeological sensitivity. NYSM Areas were not usually subject to intensive field investigation at the time of reporting, as compared to NYSHPO sites in the CRIS database. In addition, a parcel owned by the Oneida Nation (and held in federal trust) is partially located within the Facility Area.

In accordance with 19 NYCRR § 900-2.10 and the NYSHPO *Guidelines for Wind Farm Development Cultural Resources Survey Work*⁴ (the NYSHPO *Wind Guidelines*; NYSHPO, 2006), EDR will conduct a Phase IA Archaeological Survey for review and approval by NYSHPO. The purpose of the Phase IA Archaeological Survey is to:

- Define the Facility's Area of Potential Effect (APE) for Direct Effects relative to archaeological resources⁵;
- Determine whether previously identified archaeological resources are located within the APE for Direct Effects;
- Develop an archaeological sensitivity model in accordance with the NYSHPO recommendations (NYSHPO 2020b), to define areas of elevated possibility for the presence of cultural resources; and
- Propose a methodology for Phase IB archaeological testing within the APE for Direct Effects, and evaluate the eligibility of any identified resources for the State/National Register of Historic Places (S/NRHP), and assess the potential effect of the Facility on those resources.

All archaeological studies will be conducted under the supervision of a Registered Professional Archaeologist (RPA) in a manner consistent with the NYSHPO *Phase I Archaeological Report Format Requirements*⁶ and the NYSHPO *Wind Guidelines* as well as the New York Archaeological Council (NYAC) *Standards for Cultural Resource Investigations and Curation of Archaeological Collections in New York State* (the NYAC Standards).⁷

⁴ NYSHPO. 2006. *Guidelines for Wind Farm Development Cultural Resources Survey Work*. New York State Historic Preservation Office, Waterford, NY.

⁵ It is anticipated that the APE for Direct Effects will change as the Facility's design advances and becomes more refined.

⁶ NYSHPO. 2005. *New York State Historic Preservation Office (NYSHPO) Phase 1 Archaeological Report Format Requirements*. New York State Historic Preservation Office, Waterford, NY.

⁷ New York Archaeological Council (NYAC). 1994. *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State*. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY.

Historic Resources Surveys

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

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

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

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

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

The NYSHPO *Wind Guidelines* request that cultural resources surveys for wind energy projects include consultation with NYSHPO to determine the scope and methodology to identify and evaluate historic resources. The NYSHPO *Wind Guidelines* suggest the completion of a preliminary historic resources survey of the areas located within one mile of the turbines where viewshed analysis indicates the Facility is potentially visible, to be followed by a meeting with NYSHPO staff in Albany to review the results of the preliminary survey. The purpose of this meeting is to allow NYSHPO the opportunity to verify the evaluation criteria being used by the consultant to determine S/NRHP eligibility. However, EDR's cultural resources staff have successfully undertaken numerous previous historic resources surveys for energy projects in New York State in close

consultation with NYSHPO staff.⁸ In these previous surveys, NYSHPO staff have concurred with EDR staff's proposed survey methodologies, and recommendations regarding the potential S/NRHP eligibility of historic resources without the need for additional survey or justification. In recent correspondence related to other wind energy projects in New York, NYSHPO staff have confirmed that EDR does not need to conduct this initial one-mile survey and confirmation of methodology.

To ensure that potential visual effects on regional visually sensitive historic resources are adequately considered in the application process, and consistent with NYSHPO guidance, areas of potential Facility visibility within a 5-mile radius Historic Resources Study Area will be evaluated in all support studies related to aboveground historic resources (see Figure 3). The Historic Resources Study Area is defined as the area within 5 miles of the Facility's participating parcel boundaries (i.e., the Facility Area) and will be used for the purpose of identifying historic resources and evaluating visibility and potential visual impacts to those resources listed in or determined by NYSHPO to be eligible for listing in the S/NRHP.

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

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

- A total of 39 resources which are listed in the S/NRHP (including one National Historic Landmark and two historic districts);
- A total of 20 resources which were determined to be S/NRHP-eligible by NYSHPO (including two historic districts); and
- A total of 45 resources whose eligibility for the S/NRHP has not been formally determined.

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

⁸ Previous projects reviewed by NYSHPO that have included historic resources surveys conducted by EDR include the Bluestone Wind Project (17PR01874), Heritage Wind Project (18PR01833), and High Bridge Wind Project (19PR01283). Each project involved the preparation of an historic resources survey methodology that was approved by NYSHPO and resulted in a historic resources survey.

In accordance with 19 NYCRR § 900-2.10 and the NYSHPO *Guidelines*, EDR will conduct a Phase IA Historic Resources Survey for review and approval by NYSHPO. The purpose of the Phase IA Historic Resources Survey is to:

- Propose an APE for Indirect Effects to serve as the basis for the historic resources survey⁹;
- Identify previously inventoried historic properties within the Facility's Historic Resources Study Area and APE for Indirect Effects;
- Consult municipalities as well as local stakeholders (such as municipal historians and regional historical societies) to identify locally significant historic properties within the Historic Resources Study Area and APE for Indirect Effects; and
- Provide a scope of work for additional survey of historic properties within the Facility's Historic Resources Study Areas and APE for Indirect Effects in accordance with the NYSHPO *Guidelines*.

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

Summary

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

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

Grant Johnson



Senior Project Manager – Historic Preservation

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

⁹ The Facility's APE relative to historic resources may be revised in association with subsequent layout changes during the permitting process, which will be documented in the Historic Resources Survey report that is anticipated to be prepared as a subsequent step in the consideration of the Facility's potential effect on historic properties.

Attachments:

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

Figure 1. Regional Facility Location



Hoffman Falls Wind Project

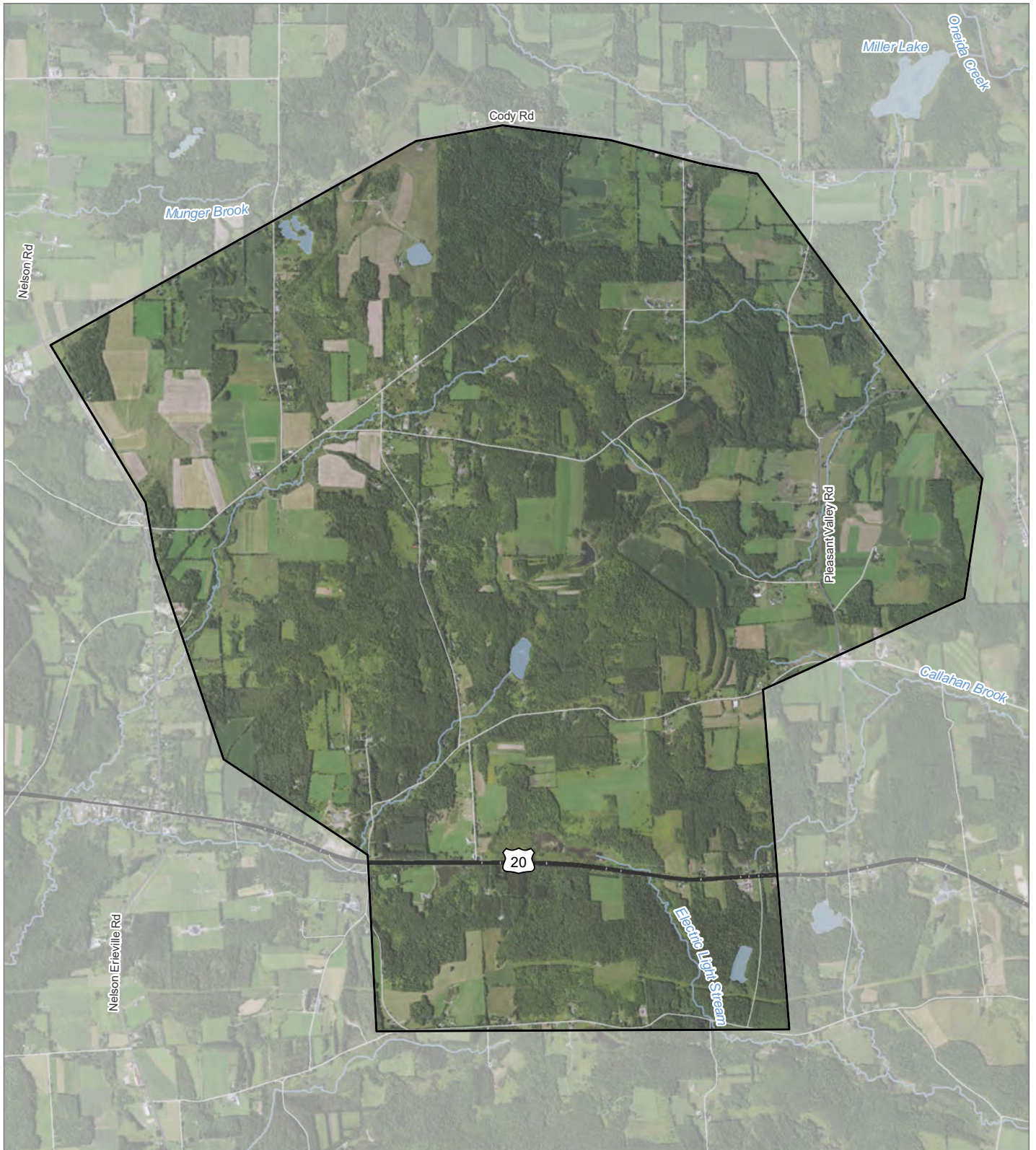
Towns of Fenner, Nelson, and Smithfield
Madison County, New York

NYSHPO Consultation Memo



0 2.5 5 10
Miles


Figure 2. Facility Area



Hoffman Falls Wind Project

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

NYSHPO Consultation Memo

 Facility Area

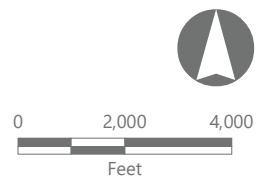
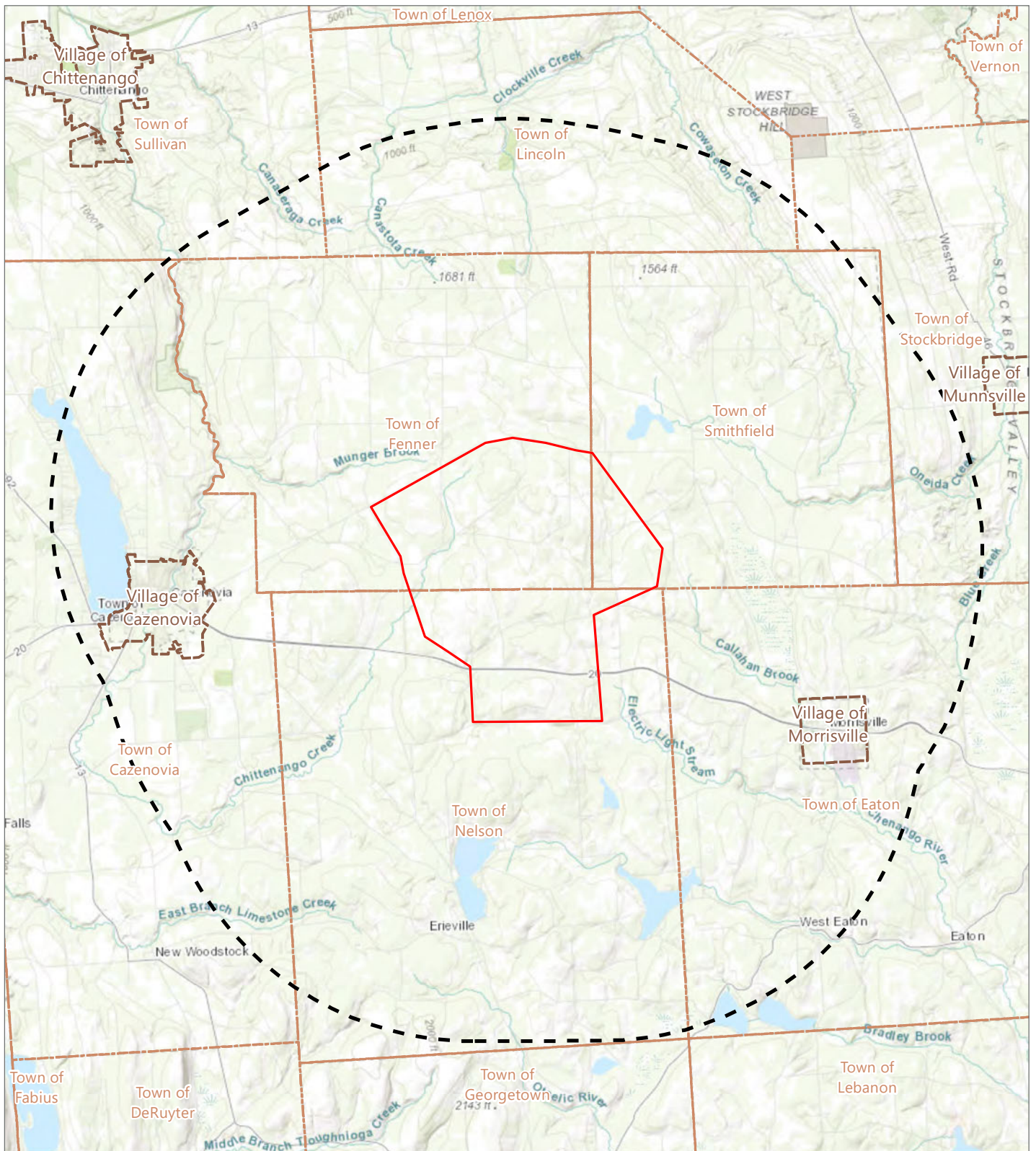



Figure 3. Historic Resources Study Area




Hoffman Falls Wind Project

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

NYSHPO Consultation Memo

 Historic Resources Study Area

 Facility Area

 City/Village Boundary


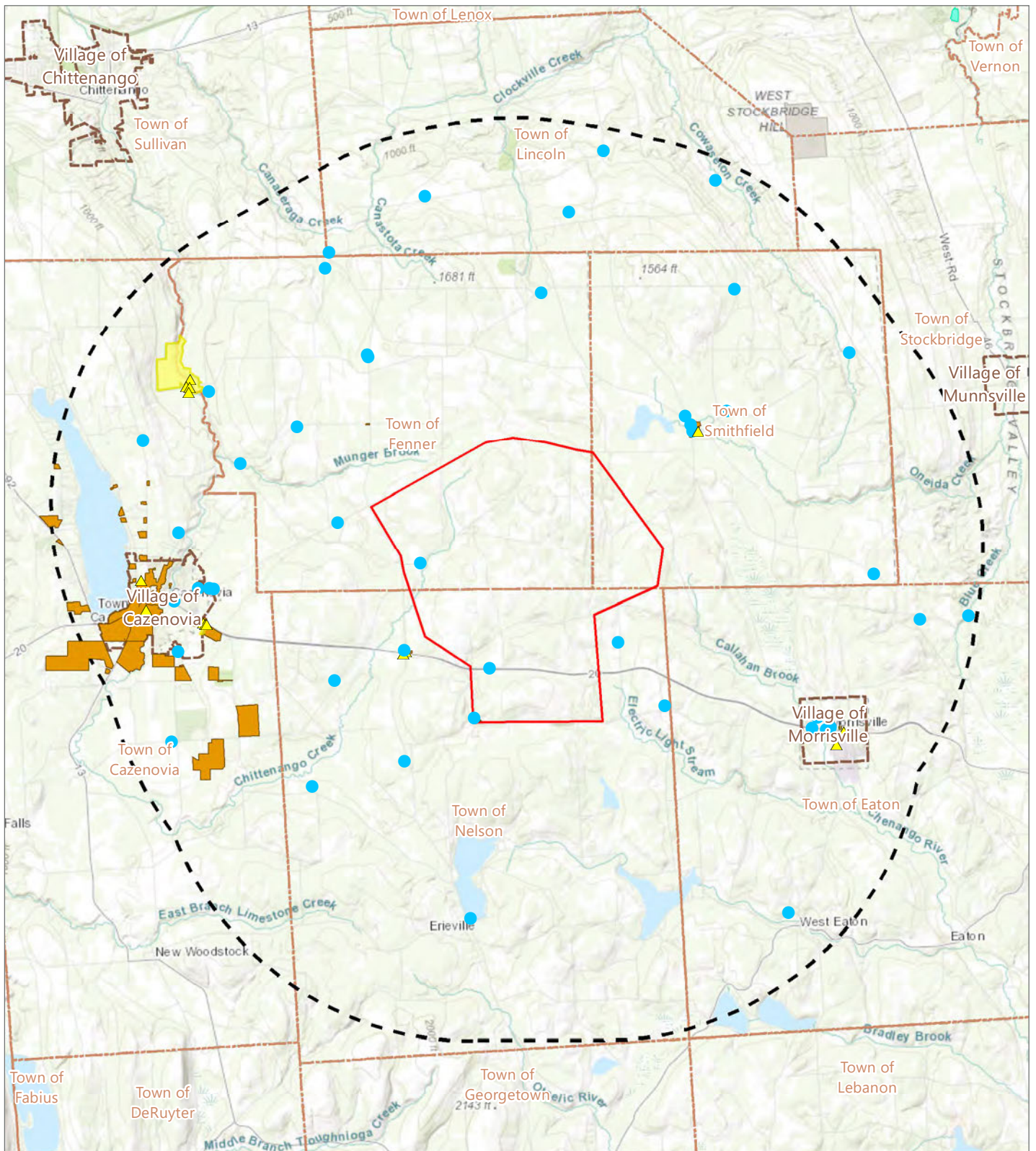
 Town Boundary



Figure 4. Previously Identified Historic Resources



Hoffman Falls Wind Project

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

NYSHPO Consultation Memo

Previously Identified Historic Resource

▲ S/NRHP-Eligible Resource (NYSHPO Determined)

● S/NRHP Eligibility Undetermined

■ S/NRHP-Eligible Historic District

■ S/NRHP-Listed Resource

■ National Historic Landmark

--- Historic Resources Study Area

□ Facility Area



Memorandum

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

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

Date: June 16, 2021

Reference: Request for Consultation
Blue Hill Wind Project
Town of Eaton, Madison County, New York

EDR Project No: 21027

On behalf of Liberty Renewables Inc. (the Applicant), Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) prepared this request for consultation for the proposed Blue Hill Wind Project (the Facility), a major renewable energy electric generating facility to be located in the Town of Eaton, Madison County, New York (see Figure 1). The information included in this memorandum is intended to initiate consultation with the New York State Office of Parks, Recreation and Historic Preservation (NYSHPO) to assist in their review of the Facility under Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law, and/or Section 106 of the National Historic Preservation Act, as applicable.

Description of the Facility

The Blue Hill Wind Project is a proposed 27-megawatt (MW) wind-powered electric generating facility consisting of up to six wind turbines within the Town of Eaton in Madison County, New York. The regional Facility location and Facility Area boundary are depicted on Figures 1 and 2, respectively. The lands being evaluated to host the Facility infrastructure (Facility Area) are rural in nature. Not all land included in the Facility Area will ultimately be developed as part of the Facility. The Facility Area is expected to include approximately 1,488 acres of leased or purchased private land, consisting primarily of open agricultural fields, fallow fields, and large forest stands. The location of the Facility Area and Facility components will be identified in detail in a forthcoming application to the New York State Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law as authorized by Public Service Law Section 162.

Archaeological Surveys

As described in 19 NYCRR § 900-2.10, a Section 94-c application must include:

- (a) *A study of the impacts of the construction and operation of the facility, interconnections and related facilities on archeological/cultural resources within the project impact area¹, including:*
- (1) *A summary of the nature of the probable impact on any archeological/cultural resources identified, addressing how those impacts shall be avoided or minimized;*
 - (2) *If required pursuant to section 900-1.3(h) of this Part, a Phase IA archeological/cultural resources study for the proposed facility;*
 - (3) *If required pursuant to section 900-1.3(h) of this Part, a Phase IB field study;*
 - (4) *If required by the Phase I study results, as determined pursuant to section 900-1.3(h) of this Part, a Phase II site evaluation study to assess the boundaries, integrity and significance of identified cultural resources;*
 - (5) *An Unanticipated Discovery Plan that shall identify the actions to be taken in the unexpected event that resources of cultural, historical, or archaeological importance are encountered during the excavation process. This plan shall include a provision for work stoppage upon the discovery of possible archaeological or human remains and be prepared by a professional archaeologist in accordance with the New York Archeological Council (NYAC) standards.*

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

NYSHPO has developed *Guidelines for Wind Farm Development Cultural Resources Survey Work* (NYSHPO *Guidelines*)² and updated recommendations for Phase IA archaeological sensitivity models.³ These include the following requirements for archaeological surveys for wind farm development:

¹ Defined in 19 NYCRR § 900-2.10 as the project impact area, which is described for the purposes of this memorandum as the Area of Potential Effect.

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

³ NYSHPO. 2020. *Phase IA Archaeological Survey Recommendations/Sensitivity Model*. New York State Historic Preservation Office, Waterford, NY. November 2020.

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

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

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

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

EDR reviewed the NYSHPO's Cultural Resource Information System (CRIS) database to identify previously recorded archaeological sites mapped within the Facility Area and a one-mile buffer. A preliminary review of the CRIS website indicates that within one mile of the Facility Area there is one previously identified archaeological site for which a formal determination of S/NRHP-eligibility has not been made.

There are no previously identified archaeological sites within the Facility Area.

In accordance with 19 NYCRR § 900-2.10 and the NYSHPO *Guidelines for Wind Farm Development Cultural Resources Survey Work*⁴ (the NYSHPO *Wind Guidelines*; NYSHPO, 2006), EDR will conduct

⁴ NYSHPO. 2006. *Guidelines for Wind Farm Development Cultural Resources Survey Work*. New York State Historic Preservation Office, Waterford, NY.

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

- Define the Facility's Area of Potential Effect (APE) for Direct Effects relative to archaeological resources⁵;
- Determine whether previously identified archaeological resources are located within the APE for Direct Effects;
- Develop an archaeological sensitivity model in accordance with the NYSHPO recommendations (NYSHPO, 2020b), to define areas of elevated possibility for the presence of cultural resources; and
- Propose a methodology for Phase IB archaeological testing within the APE for Direct Effects, and evaluate the eligibility of any identified resources for the State/National Register of Historic Places (S/NRHP), and assess the potential effect of the Facility on those resources.

All archaeological studies will be conducted under the supervision of a Registered Professional Archaeologist (RPA) in a manner consistent with the NYSHPO *Phase I Archaeological Report Format Requirements*⁶ and the NYSHPO *Wind Guidelines* as well as the New York Archaeological Council (NYAC) *Standards for Cultural Resource Investigations and Curation of Archaeological Collections in New York State* (the NYAC Standards).⁷

Historic Resources Surveys

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

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

⁵ It is anticipated that the APE for Direct Effects will change as the Facility's design advances and becomes more refined.

⁶ NYSHPO. 2005. *New York State Historic Preservation Office (NYSHPO) Phase 1 Archaeological Report Format Requirements*. New York State Historic Preservation Office, Waterford, NY.

⁷ New York Archaeological Council (NYAC). 1994. *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State*. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY.

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

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

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

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

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

⁸ Previous projects reviewed by NYSHPO that have included historic resources surveys conducted by EDR include the Bluestone Wind Project (17PR01874), Heritage Wind Project (18PR01833), and High Bridge Wind Project (19PR01283). Each project involved the preparation of an historic resources survey methodology that was approved by NYSHPO and resulted in a historic resources survey.

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

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

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

- A total of nine resources which are listed in the S/NRHP (including one National Historic Landmark);
- A total of nine resources (including one historic district) which were determined to be S/NRHP-eligible by NYSHPO; and
- A total of 30 resources whose eligibility for the S/NRHP has not been formally determined.

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

In accordance with 19 NYCRR § 900-2.10 and the NYSHPO *Guidelines*, EDR will conduct a Phase IA Historic Resources Survey for review and approval by NYSHPO. The purpose of the Phase IA Historic Resources Survey is to:

- Propose an APE for Indirect Effects to serve as the basis for the historic resources survey⁹;
- Identify previously inventoried historic properties within the Facility's Historic Resources Study Area and APE for Indirect Effects;

⁹ The Facility's APE relative to historic resources may be revised in association with subsequent layout changes during the permitting process, which will be documented in the Historic Resources Survey report that is anticipated to be prepared as a subsequent step in the consideration of the Facility's potential effect on historic properties.

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


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

Summary

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

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

Grant Johnson



Senior Project Manager – Historic Preservation

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

Attachments:

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

Figure 1. Regional Facility Location



Blue Hill Wind Project

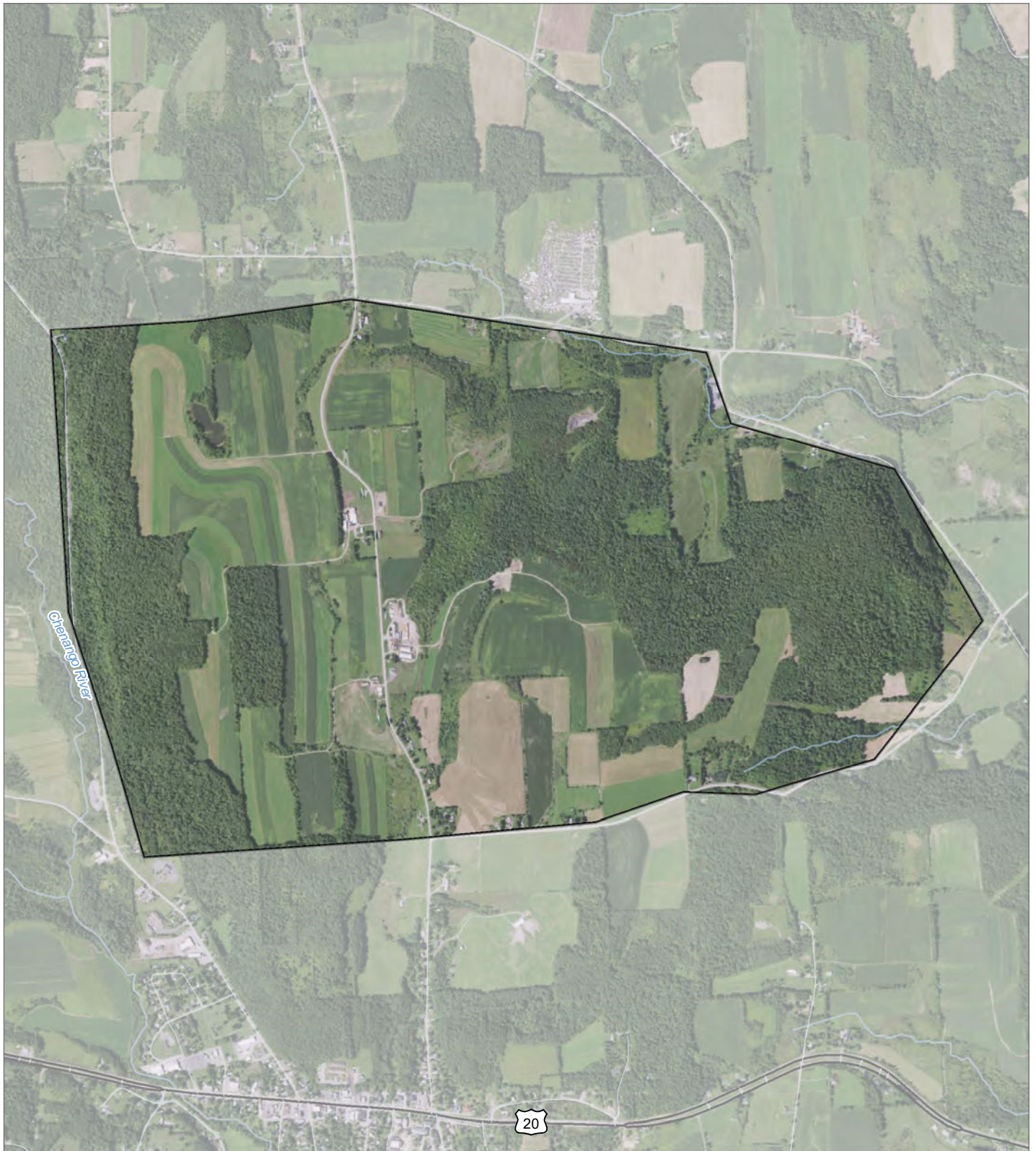
Town of Eaton
Madison County, New York

NYSHPO Consultation Memo



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Miles

Figure 2. Facility Area



Blue Hill Wind Project

Town of Eaton
Madison County, New York

NYSHPO Consultation Memo

 Facility Area

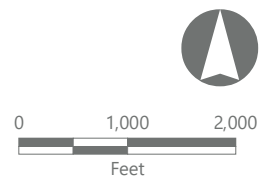
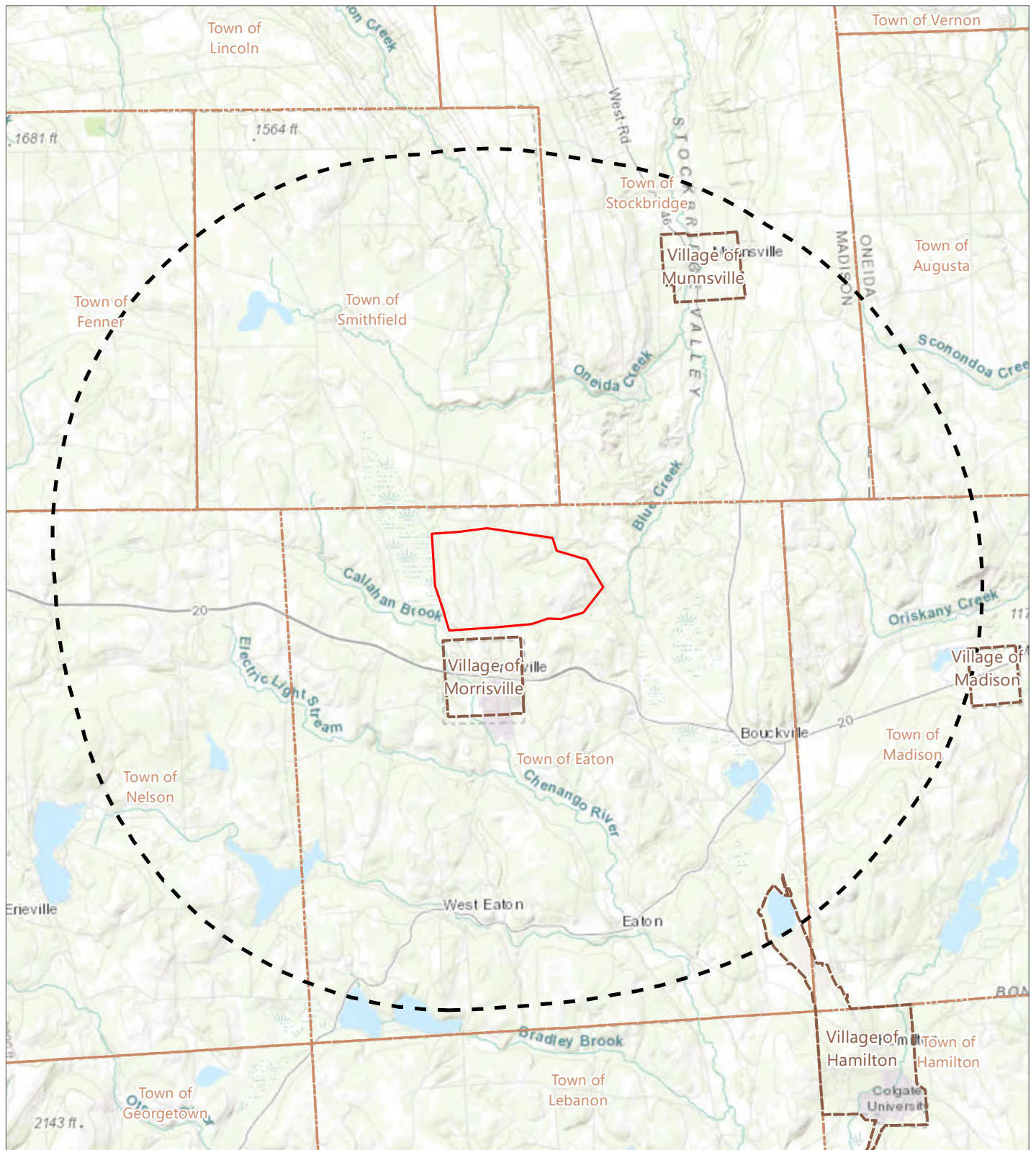


Figure 3. Historic Resources Study Area



Blue Hill Wind Project

Town of Eaton
Madison County, New York

NYSHPO Consultation Memo

Historic Resources Study Area

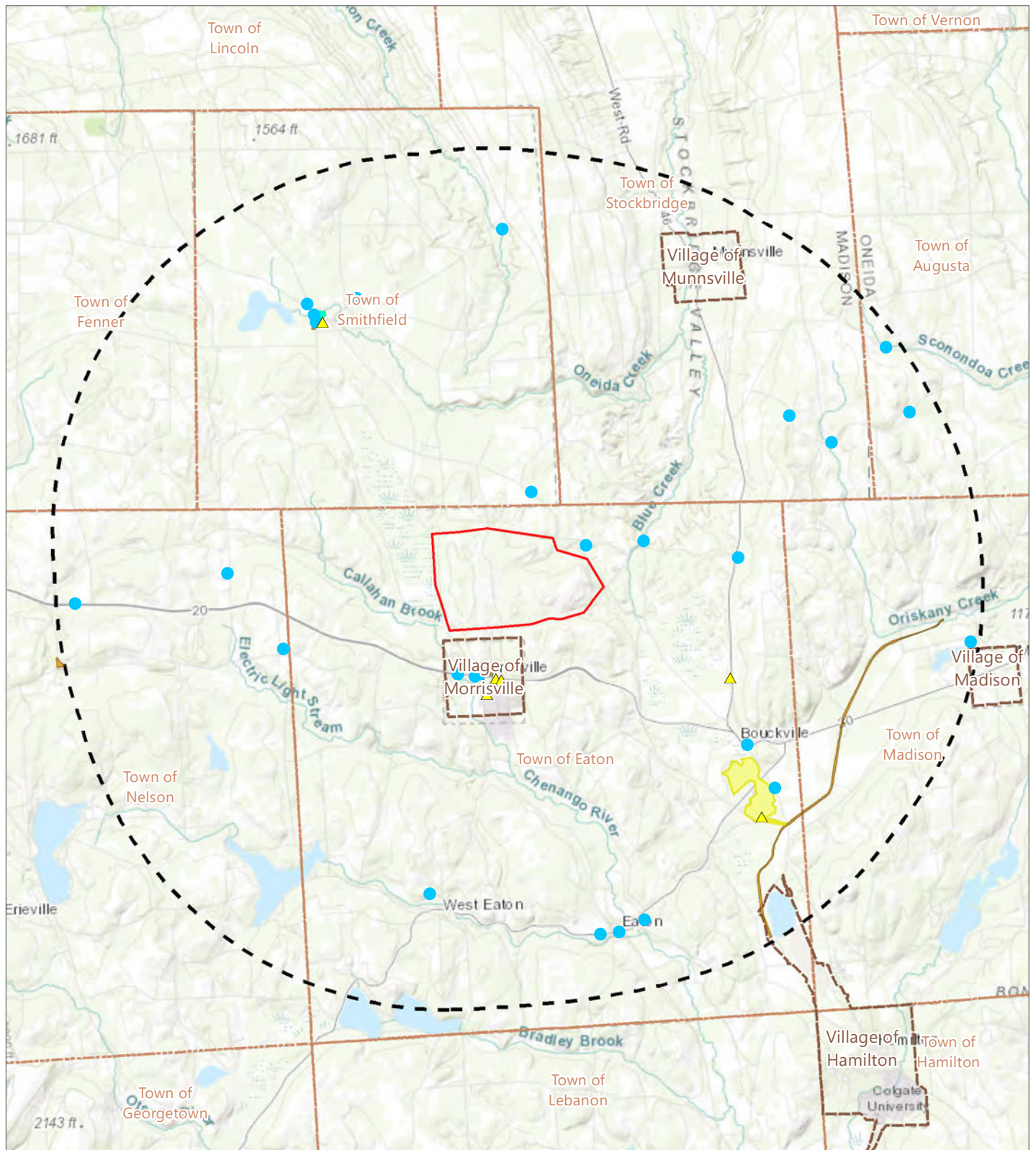
Facility Area

City/Village Boundary

Town Boundary



Figure 4. Previously Identified Historic Resources



Blue Hill Wind Project

Town of Eaton
Madison County, New York

NYSHPO Consultation Memo

Previously Identified Historic Resource

- ▲ S/NRHP-Eligible Resource (NYSHPO Determined)
- S/NRHP Eligibility Undetermined
- S/NRHP-Eligible Historic District (NYSHPO Determined)
- S/NRHP-Listed Resource
- National Historic Landmark
- Historic Resources Study Area

Facility Area





**Parks, Recreation,
and Historic Preservation**

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

June 21, 2021

Kristen Olson
Project Architectural Historian
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 Kristen Olson:

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 16, 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
timothy.lloyd@parks.ny.gov

via e-mail only



**Parks, Recreation,
and Historic Preservation**

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

June 21, 2021

Kristen Olson
Project Architectural Historian
Environmental Design & Research
217 Montgomery Street
Suite 1000
Syracuse, NY 13202

Re: ORES
Blue Hill Wind Project
Town of Eaton, Madison County, NY
21PR03989

Dear Kristen Olson:

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).

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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
timothy.lloyd@parks.ny.gov

via e-mail only

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
Tim Lloyd	Archaeology	Kristen, OPRHP 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.
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.

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 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
							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.

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	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	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	Tim Lloyd	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 - Project Review No. 23-00038

Reviewer	Review Type	Response
Tim Lloyd	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	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 IB archaeological survey

Attachments

Attachment	Reviewer	Review Type	Type	Name	Description
	Tim Lloyd	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

Kristen Olson
Project Architectural Historian
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 Kristen Olson:

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 at Bradley.Russell@parks.ny.gov.

Sincerely,

Bradley W. Russell, Ph.D.
Historic Preservation Specialist - Archaeology



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

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

May 16, 2023

Kristen Olson
Project Architectural Historian
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 Kristen Olson:

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 reached at Bradley.Russell@parks.ny.gov.

Sincerely,

Bradley W. Russell, Ph.D.
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
Daniel H. Boggs	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: [Russell, Bradley \(PARKS\)](#)
To: [Jesse Bergevin: bprintup@hetf.org](#)
Cc: [Primeau, Kristy \(ORES\)](#); [Moir Magni](#); [Joseph Kwiatek](#)
Subject: RE: Hoffman Falls Wind Project (21PR03978) - Phase IA and IB Reports for Your Review - Part 2
Date: Wednesday, January 10, 2024 12:01:44 PM
Attachments: [image001.png](#)
[2023-12-13T13-06-442023-12-13_Hoffman_Falls_Wind_Phase_IB_Archaeology_Survey_Report_Companded_Part1.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 (1 of 3)

From: Russell, Bradley (PARKS)
Sent: Wednesday, January 10, 2024 11:56 AM
To: Jesse Bergevin <jbergevin@oneida-nation.org>; bprintup@hetf.org
Cc: Primeau, Kristy (ORES) <Kristy.Primeau@ores.ny.gov>; Moira Magni <mmagni@edrdpc.com>; Joseph Kwiatek <jkwiatek@edrdpc.com>
Subject: Hoffman Falls Wind Project (21PR03978) - Phase IA and IB Reports for Your Review - Part 1

Good Morning Jesse and Brian,

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 Kristy Primeau and copy me so I can file your response in CRIS.

Thank you,
Brad

Bradley W. Russell, Ph.D.
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
518-268-2124 | Bradley.Russell@parks.ny.gov
<https://parks.ny.gov/shpo>





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

KATHY HOCHUL
Governor

ERIK KULLESEID
Commissioner

February 9, 2024

Kristen Olson
Project Architectural Historian
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 Kristen Olson:

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 10 Historic Period (19th and 20th century) archaeological sites:

BEGIN CONFIDENTIAL INFORMATION <



>END CONFIDENTIAL INFORMATION

OPRHP concurs with the report recommendation that all ten sites 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 21028-HAS-10. 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 Bradley.Russell@parks.ny.gov.

Sincerely,

A handwritten signature in black ink that reads "Brad Russell". The script is cursive and fluid.

Bradley W. Russell, Ph.D.
Historic Preservation Specialist - Archaeology