

New York State Office of Parks, Recreation and Historic
Preservation Project-Related Correspondence



4425 Forbes Boulevard
Lanham, Maryland 20706

Main 301-306-6981
Fax 301-306-6986

February 4, 2016

Ms. Ruth Pierpont, Deputy Commissioner/Deputy SHPO
New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island Resource Center, PO Box 189
Waterford, NY 12188-0189

RE: Request for Consultation: Proposed Eight Point Wind Energy Center, Towns of Canisteo, Greenwood, Hartsville, Hornellsville, Jasper, Troupsburg, and West Union, Steuben County.

Dear Ms. Pierpont,

Eight Point Wind, LLC, a wholly owned subsidiary of NextEra Energy Resources, LLC (NextEra) proposes to construct the Eight Point Wind Energy Center (Project), large electric generating wind facility, in the Towns of Canisteo, Greenwood, Hartsville, Hornellsville, Jasper, Troupsburg, and West Union, in Steuben County, New York (**Figures 1 and 2**). Eight Point Wind, LLC plans to submit an application to the NYS Department of Public Service to construct the Project under Article 10 of the Public Service Law (PSL). This request is being made in order to help inform the Article 10 application process.

The Project will have a maximum generating capability of 103.4 megawatts (MW) of power from an estimated 32 wind turbines located on land leased from private property owners. Project facilities will include commercial-scale wind turbines (130-meter diameter rotors), 10 miles of access roads, 3 miles of buried and overhead electric collection lines, a 5-acre Project collection substation, four 110-m meteorological towers, a 5000-square-foot operation and maintenance (O&M) building, electrical interconnection facilities, and 10 acres of laydown areas. NextEra anticipates the interconnection facilities will include a 115-kV switchyard built adjacent to New York State Electric and Gas Corporation's (NYSEG) 115-kV Bennett Substation, and an overhead 115-kV interconnection line approximately 9.8 miles long.

NextEra provides wholesale electricity to the public using clean, renewable sources such as wind. This energy supports the federal government's policy as articulated in 42 U.S.C. 9201 to "hasten the widespread utilization of [wind energy] systems," as well as the State of New York's new energy policy, Reforming the Energy Vision (REV), which calls for the transition to an integrated energy network able to combine the benefits of a centralized grid with clean, locally generated power (PSC, 2015). The Project would be compatible with these federal and state policies and renewable energy goals.

TRC Environmental Corporation (TRC) has been retained by NextEra to provide environmental review and licensing services in support of the Project. The purpose of this letter is to initiate formal consultation with your agency in determining potential impacts to cultural resources that could result from the Project. TRC will also be undertaking, on NextEra's behalf, cultural resource studies/surveys (Archaeology and Historic Architecture) that may be required in support of Project review.

To that end, TRC is also providing a Research Design for Cultural Resources Studies as an attachment to this letter (uploaded as a separate document in CRIS) for your agency's review and approval. Also uploaded to CRIS are Project Shapefiles that show the preliminary Project layout. At present, proposed

Project impact areas that have been identified include the turbine locations and the overhead 115-kV interconnection line. Other Project facilities are under design and will be provided to the OPRHP, along with identified cultural resource sensitivity and proposed survey methods, for review and approval prior to fieldwork. It is understood that throughout the course of consultation TRC will provide all new and modified plans to the OPRHP for review and comment.

We look forward to receiving your comments on the proposed Project and Research Design for Cultural Resources Studies to be conducted in support of the licensing process. Should you have any questions or require additional information, please do not hesitate to contact me at (301) 276-8040, or tsara@trcsolutions.com.

Sincerely yours,
Timothy R. Sara, RPA

A handwritten signature in black ink, appearing to read 'T. Sara', written over a horizontal line.

Program Manager, Cultural Resources

cc: Ryan Pumford, NextEra
Coke Coakley, NextEra
Josh Brown, TRC
Terry Orr, TRC

file 246409.0000.0000



Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

February 29, 2016

Mr. Timothy Sara
Program Manager, Cultural Resources
TRC Environmental Corp.
4425 Forbes Blvd
Suite B
Lanham, MD 20706

Re: USACE
Eight Point Wind Energy Center
Towns of Canisteo, Greenwood, Hartsville, Hornellsville, Jasper, Troupsburg, and
West Union, Steuben County, NY
16PR00701

Dear Mr. Sara:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the *Research Design For: Phase IA/IB Cultural Resources Survey of Proposed Eight Point Wind Energy Project* prepared by TFC in February 2016 in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO 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 National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

Based upon this review, SHPO noted the absence of an architectural historian on the project team. Per the *New York State Historic Preservation Office Guidelines for Wind Farm Development Cultural Resources Survey Work* a 36 CFR Part 61 certified architectural historian must be on the project to receive SHPO approval. A minimum of two (2) meetings with SHPO will be required during the project. TFC must meet to consult with SHPO prior to field work to delineate the Area of Potential Effect (APE) and Study Area, and discuss the methodology outlined in the historic resources survey work plan.

For questions regarding the architectural survey, please contact James Finelli (518-268-2215, james.finelli@parks.ny.gov) in our Survey Unit.

SHPO accepts the use of the proposed alternate probability model to stratify the APE for archaeological resources. However, the total level of effort should be comparable with what would be undertaken if the standard approach, described in the existing guidance, were employed. Please revise your testing strategy accordingly. Furthermore, the standard approach involves the selection of a subsample of each probability zone which would then be tested at

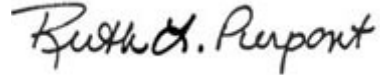
Division for Historic Preservation

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5m intervals. This closer interval is especially important for the identification of small upland sites, which are expected to predominate in project areas such as this. Please revise your approach accordingly and submit an updated research design.

For questions regarding archaeology, Please contact Philip Perazio (518-268-2175 or philip.perazio@parks.ny.gov).

Sincerely,

A handwritten signature in black ink that reads "Ruth L. Pierpont". The signature is written in a cursive style with a large, stylized "R" and "P".

Ruth L. Pierpont
Deputy Commissioner for Historic Preservation



Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

March 29, 2016

Mr. Timothy Sara
Program Manager, Cultural Resources
TRC Environmental Corp.
4425 Forbes Blvd
Suite B
Lanham, MD 20706

Re: USACE
Eight Point Wind Energy Center
Towns of Canisteo, Greenwood, Hartsville, Hornellsville, Jasper, Troupsburg, and West Union,
Steuben County, NY
16PR00701

Dear Mr. Sara:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the *Revised Research Design for Phase IA/IB Cultural Resources Survey of Proposed Eight Point Wind Energy Project* prepared by TFC on February 29, 2016 in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO 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 National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

The SHPO requires that all resources surveyed as part of the *Phase IA/IB Cultural Resources Survey* be entered into the CRIS database using the survey wizard instead of a pdf format spreadsheet. Additionally, TRC should make no assumptions about the potential presence of rural historic districts or cultural landscapes prior to field work. The SHPO otherwise concurs with the *Revised Research Design*.

For questions regarding the architectural survey, please contact James Finelli (518-268-2215, james.finelli@parks.ny.gov) in our Survey Unit.

Sincerely,

Ruth L. Pierpont
Deputy Commissioner for Historic Preservation

Division for Historic Preservation

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Hayden, Philip

From: Finelli, James (PARKS) <James.Finelli@parks.ny.gov>
Sent: Tuesday, January 24, 2017 11:31 AM
To: Hayden, Philip
Cc: Sara, Tim
Subject: RE: Eight Point Wind
Attachments: Instructions for CRIS Independent Survey (revised).pdf

Phil,

After consulting with colleagues it was decided that a face to face meeting is not necessary. Your viewshed analysis, proposed APE and survey methodology must be submitted via the CRIS online system for approval. To your specific questions:

1. The APE buffer is fine until the precise locations of the turbines have been selected.
2. I'm currently waiting on approval of the tree height visibility model.
3. We are waving the 1-mile survey provision.
4. If anything further is required by our office before commencement of field work it will be noted in the response to the proposed APE via CRIS.

Additionally, to the question of duplication of previous survey work our office will notify you once we've analyzed the proposed APE.

A draft visual APE is unnecessary. Once you have a completed visual APE please submit it via CRIS for approval.

I've attached the pdf instructions for submitting a survey into CRIS. The instructions assume that you are creating a survey that doesn't already have a project number. Once the APE is approved you'll receive a request to submit a survey to the existing project number (16PR00701). When you respond to that request you should be starting from step 2 in the instructions since a project already exists.

Let me know if you have any questions.

James

James J. Finelli

Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189
518.268.2215 | james.finelli@parks.ny.gov
<http://nysparks.com/shpo/>

From: Hayden, Philip [mailto:PHayden@trcsolutions.com]
Sent: Monday, January 23, 2017 4:57 PM
To: Finelli, James (PARKS)
Cc: Sara, Tim
Subject: FW: Eight Point Wind

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

James,
Thank you again for taking time to speak with me over the telephone today.

Regarding the meeting, I understand you will consult with your colleagues about our proposed methodology for delineating the visual APE and any other information they may wish to see from us. A face-to-face meeting may not be required after all, but if so, you will coordinate with them about suitable dates and times. If I can help facilitate the scheduling, please do not hesitate to ask. Specific comments/questions for their consideration include as follows:

1. At present, the 5-mile APE buffer extends outward from the overall project boundary instead of the individual turbines. This allows for slight changes in turbine locations as project plans advance while still ensuring maximum coverage. The final report will calculate the 5-mile buffer from the turbine locations.
2. The view shed modeling calculates visibility based on topography only (per the Wind Farm Guidelines) and on an average tree height of 50 feet to account for the screening effects of vegetation. The proposed APE for visual effects would take into account the vegetative buffer, subject to field verification.
3. Considering TRC's experience and expertise, would it be possible to waive the 1-mile ring survey provision?
4. In addition to a set of maps depicting the proposed visual effects APE, would you and your colleagues like to see anything else from us in order to conclude the APE delineation phase of the project?

As discussed, I will double-check to see if I may send you a draft visual APE map (turbine field only) for your general comment. It is only a preliminary draft and not for project review or general distribution. It delineates areas of visibility based on topography only and on the vegetative buffer. The base map depicts roads but can be switched out with topographic maps and aerial photographs. I will follow-up shortly.

Finally, I look forward to receiving the pdf copy of the NY CRIS Survey Wizard guidelines.

Again, thank you for your time, and I look forward to hearing from you at your earliest convenience regarding the need for a face-to-face meeting and possible dates.

Regards,
Phil

From: Hayden, Philip
Sent: Monday, January 23, 2017 9:56 AM
To: 'Finelli, James (PARKS)' <James.Finelli@parks.ny.gov>
Subject: RE: Eight Point Wind

Perfect. I'll call you at 518.268.2215.
Many thanks,
Phil

From: Finelli, James (PARKS) [mailto:James.Finelli@parks.ny.gov]
Sent: Monday, January 23, 2017 9:54 AM
To: Hayden, Philip <PHayden@trcsolutions.com>
Subject: RE: Eight Point Wind

Phil,

How about 3pm today?

James J. Finelli

Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189

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From: Hayden, Philip [<mailto:PHayden@trcsolutions.com>]

Sent: Monday, January 23, 2017 8:25 AM

To: Finelli, James (PARKS)

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Dear James,

This is just a quick follow-up to my email of last week to let you know that my other obligation for this morning was cancelled. I am available to chat anytime this week, at your convenience. I look forward to speaking with you.

Regards,

Phil Hayden

From: Hayden, Philip

Sent: Wednesday, January 18, 2017 3:11 PM

To: 'Finelli, James (PARKS)' <James.Finelli@parks.ny.gov>

Subject: RE: Eight Point Wind

Dear James,

Thank you very much for your reply, and I understand completely. For the week of 1/23, I am available Monday after 1 pm and then anytime during the remainder of the week, at your convenience. Please feel free to pick a time and let me know when and what number to phone. I look forward to speaking with you.

Regards,

Phil

Philip A. Hayden, M.A.

Senior Architectural Historian

phayden@trcsolutions.com



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From: Finelli, James (PARKS) [<mailto:James.Finelli@parks.ny.gov>]
Sent: Wednesday, January 18, 2017 2:57 PM
To: Hayden, Philip <PHayden@trcsolutions.com>
Subject: Eight Point Wind

Mr. Hayden,

Thank you for reaching out to me on the Eight Point Wind Project. I'm unfortunately tied down with deadlines this week, which is why I haven't called you back. Could we set a time to talk next week?

Best,

James

James J. Finelli

Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation

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<http://nysparks.com/shpo/>

Hayden, Philip

From: Finelli, James (PARKS) <James.Finelli@parks.ny.gov>
Sent: Wednesday, January 25, 2017 2:09 PM
To: Hayden, Philip
Subject: RE: Eight Point Wind

Phil,

You have approval to use vegetation along with topography in your viewshed analysis.

James

James J. Finelli

Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189
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From: Hayden, Philip [mailto:PHayden@trcsolutions.com]
Sent: Tuesday, January 24, 2017 12:47 PM
To: Finelli, James (PARKS)
Cc: Sara, Tim
Subject: RE: Eight Point Wind

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James,

Thanks for your reply and the accompanying instructions. We are very grateful for the show of confidence.

Regarding the tree height, I would appreciate it if you could let me know at your earliest convenience. On that score, we've run a comparison using 40, 50, and 70-foot tree heights and found that the line of sight does not change much, given the size of the proposed turbines. We settled on 50 feet as a reasonably conservative average. Please let me know if you require any additional information, and I look forward to hearing from you.

Regards,
Phil

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Sent: Tuesday, January 24, 2017 11:31 AM
To: Hayden, Philip <PHayden@trcsolutions.com>
Cc: Sara, Tim <TSara@trcsolutions.com>
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Let me know if you have any questions.

James

James J. Finelli

Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation

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Finally, I look forward to receiving the pdf copy of the NY CRIS Survey Wizard guidelines.

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James J. Finelli
Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189

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Senior Architectural Historian

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James

James J. Finelli

Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

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March 6, 2017

Ruth Pierpont, Deputy Commissioner/Deputy SHPO
New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island Resource Center, PO Box 189
Waterford, NY 12188-0189

ATTN: James J. Finelli, Historic Preservation Program Analyst
Survey and Evaluation Unit

**RE: Area of Potential Effects for Historic Architecture
Eight Point Wind Energy Center, Steuben County, New York
Project Review Number: 16PRO0701**

Dear Ms. Pierpont,

As part of ongoing consultation, TRC Environmental Corporation (TRC) is pleased to submit for your approval this letter and supporting attachments delineating the historic architectural Area of Potential Effects (APE) for the above referenced Project. TRC is conducting cultural resources investigations on behalf of Eight Point Wind, LLC, in support of permit and licensing applications under the United States Army Corps of Engineers (Section 106) and Articles VII and 10 of the New York Public Service Law.

As presently planned, the Project includes the following elements:

- Estimated 32 commercial-scale wind turbines (131.5 and 178.5 meters, ground to blade tip);
- 103.4 megawatts maximum generating capability;
- 10 miles of access roads;
- 27 miles of mostly buried and some overhead electric collection lines;
- Five-acre collection substation;
- Up to two 110-meter (max height) meteorological towers;
- Up to two 80-meter meteorological towers;
- 5000-square-foot operation and maintenance building;
- 16-mile-long overhead 115-kilovolt transmission line with poles between 75 and 125 feet; and
- Interconnection facilities adjacent to existing Bennett Substation, Hornellsville

The Project location (**Figures 1 and 2**) is chiefly rural: characterized by hills and valleys, forest, pastureland, cultivated fields, and nineteenth- and twentieth-century farmsteads. More recent post-1967 infill residential

development extends along the existing road network. Several small nineteenth-century villages surround commercial and transportation centers. Affected communities include the towns of Canisteo, Greenwood, Hartsville, Hornell City, Hornellsville, Jasper, Troupsburg, and West Union in Steuben County and Alfred, Andover, and Independence in Allegany County. Project visibility also extends into neighboring Pennsylvania. The Project boundary as currently delineated encompasses a larger area than will be required ultimately and will decrease in size as the Project plans advance to final design. The number of affected communities and overall impacts will decrease proportionately.

In its letter of March 29, 2016, the Office of Parks, Recreation and Historic Preservation (OPRHP) approved TRC's revised Research Design (dated February 29, 2016) for the cultural resources survey. On January 24, 2017, TRC presented its approach to delineating the APE for both direct and indirect visual effects in a telephone conversation with Mr. James J. Finelli of your staff. Following this discussion, and confirmed via email on January 25, 2017, the OPRHP agreed to waive both the in-person APE review meeting and the one-mile "ring" survey provisions of its *Guidelines for Wind Farm Development Cultural Resources Survey Work (Guidelines)*. Additionally, the OPRHP approved TRC's use of vegetation and topography for conducting its viewshed analysis in conjunction with delineating the APE for visual effects.

TRC has delineated the APE for direct effects pursuant to 36 CFR § 800.16(d). This comprises the Project's area of physical construction, including all building and substations sites, access roads, power line corridors, and turbine sites. Following OPRHP's *Guidelines*, the APE for indirect visual effects extends outward in a 5-mile radius from each proposed turbine location and includes all areas within a straight line of sight of the new Project structures. For the proposed transmission line corridor, TRC has adopted a similar approach for the visual effects APE by using the 0.5-mile-radius APE standard employed by the Federal Communications Commission (FCC) for cellular tower construction. Areas not in the line of sight are generally excluded from the APE but will be subject to verification in the field. In cases where potential historic districts or cultural landscapes extend outside the visual effects APE, the architectural survey will identify an overall district boundary but limit survey efforts only to resources inside the viewshed.

To locate and plot the viewsheds for both the turbine field and transmission line, TRC utilized several computerized Geographical Information System (GIS) desktop analyses based on both straight topography and an average 50-foot tree cover. Coarsely plotted tree data, a result of the scales involved, was checked and refined using modern aerial photography.

The results of the viewshed analyses, together with additional explanatory notes, appear on the APE maps attached (uploaded separately in CRIS). The maps are divided into two sets: one for the proposed turbine field and one for the proposed transmission line. Each map also depicts previously identified historic properties listed in or eligible for listing in the National Register of Historic Places (NRHP), and previously surveyed resources not yet evaluated or found not eligible for listing in the NRHP. Towns and villages with high concentrations of historic resources are called out separately in accompanying attachments. For clarity, the maps do not depict the direct effects APEs. TRC will provide any APE and project boundary modifications, as necessitated by project design, to the OPRHP for review and comment throughout the course of consultation.

We look forward to receiving your concurrence with the APE methodology and delineation. Should you have any questions or require additional information, please do not hesitate to contact me at (301) 276-8044, or at phayden@trcsolutions.com.

Sincerely yours,



Philip A. Hayden, M.A.
Senior Architectural Historian

Attachments:

- Turbine Project Study Area Historic Architectural APE (Roads)
- Turbine Project Study Area Historic Architectural APE (USGS)
- Turbine Project Study Area Historic Architectural APE, Attachment A
- Turbine Project Study Area Historic Architectural APE, Attachment B
- Turbine Project Study Area Historic Architectural APE, Attachment C
- Transmission Line Project Study Area Historic Architectural APE (Roads)
- Transmission Line Project Study Area Historic Architectural APE (USGS)
- Transmission Line Project Study Area Historic Architectural APE, Attachment A

cc: David Gil, NextEra
Coke Coakley, NextEra
Brian Schwabenbauer, TRC
Terry Orr, TRC
Timothy R. Sara, TRC

Hayden, Philip

From: Finelli, James (PARKS) <James.Finelli@parks.ny.gov>
Sent: Monday, March 20, 2017 2:56 PM
To: Hayden, Philip
Cc: Schwabenbauer, Brian; Orr, Terry; Sara, Tim
Subject: RE: Eight Point Wind Visibility Model

Follow Up Flag: Follow up
Flag Status: Flagged

Phil,

I have met with our director of compliance to discuss the visibility model for the Eight Point Wind project. Our wind project guidelines are rather old and we are in the process of evaluating changes to those guidelines. There was an internal miscommunication based on those discussions which led to the approval of the 50' foot tree height in the visibility model. Topography is currently, and will continue to be, the only acceptable basis for the visibility model until the guidelines are formally updated. However, I have confirmed with the director that since TRC's work up to this point has been based on the belief that tree height could be incorporated into the visibility model then TRC may continue to do so for the Eight Point Wind project. The approval is an exception for this project and will not apply to future projects. Those projects must be based on topography only.

If you have any questions or concerns feel free to call me at the number below.

Best,

James

James J. Finelli

Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189
518.268.2215 | james.finelli@parks.ny.gov
<http://nysparks.com/shpo/>

From: Hayden, Philip [mailto:PHayden@trcsolutions.com]
Sent: Friday, March 17, 2017 3:43 PM
To: Finelli, James (PARKS)
Cc: Schwabenbauer, Brian; Orr, Terry; Sara, Tim
Subject: RE: Eight Point Wind Visibility Model

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

James,

Thank you very much for speaking with me this afternoon. Please do not hesitate to call if you have additional questions, and I look forward to discussing the matter further with you and your colleagues in order to resolve any outstanding questions or concerns in the proposed methodology.

Very truly yours,
Phi

Philip A. Hayden, M.A.
Senior Architectural Historian
phayden@trcsolutions.com



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From: Finelli, James (PARKS) [<mailto:James.Finelli@parks.ny.gov>]
Sent: Friday, March 17, 2017 9:08 AM
To: Hayden, Philip <PHayden@trcsolutions.com>
Subject: Eight Point Wind Visibility Model

Hi Phil,

In reviewing the visibility model for the Eight Point Wind project I see that accounting for 50' tree cover excludes a significant amount of built resources as opposed to a topo-only model. Please advise as to whether you intend to reduce the field survey to conform to the tree cover.

James

James J. Finelli
Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation
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Hayden, Philip

From: Finelli, James (PARKS) <James.Finelli@parks.ny.gov>
Sent: Wednesday, June 14, 2017 9:23 AM
To: Hayden, Philip
Subject: Eight Point Wind Report

Hi Phil,

I've checked with the technical reviewer about recommendations of effects. If you wish, you can go ahead and include your recommendations in the survey report document.

Let me know if you have any questions.

Best,

James

James J. Finelli

Historic Preservation Program Analyst
Survey and Evaluation Unit
CLG Representative, Western New York

New York State Parks, Recreation & Historic Preservation

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View and/or Address a Response

Project 16PR00701: Eight Point Wind Energy Center/32 Turbines/103.4 MW (FRVTHGWNFKEV)[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
James Finelli	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
<input type="checkbox"/>	Information Requested	James Finelli	Survey and Evaluation	Request a New Attachment, Photo, or Survey for this Consultation Project		Survey	Please provide a survey addendum including all cemeteries that have been recorded for this project. Please submit each as a built resource with photos, date of first interment and a brief description.

Attachments

Attachment	Reviewer	Review Type	Type	Name	Description
No Attachment Records					



Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ROSE HARVEY
Commissioner

September 21, 2017

Mr. Timothy Sara
Program Manager, Cultural Resources
TRC Environmental Corp.
4425 Forbes Blvd, Suite B
Lanham, MD 20706

Re: USACE
Eight Point Wind Energy Center/32 Turbines/103.4 MW
Towns of Canisteo, Greenwood, Hartsville, Hornellsville, Jasper, Troupsburg, and West Union,
Steuben County, NY
16PR00701

Dear Mr. Sara:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the submitted materials in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

SHPO has reviewed the Phase I archaeological report submitted for this project – *Phase IA/IB Archaeological Survey of the Eight Point Wind Energy Project, Steuben County, New York* (TRC, August 2017).

This investigation has resulted in the re-identification of a previously recorded historic period archaeological site - Millennium Pipeline STE-9835 / EPW-TRC-1 (10114.000028). In addition, two previously unrecorded sites were identified:

one historic period site - EPW-TRC-2 (10130.000007); and
one precontact site - EPW-TRC-3 (10114.000049).

The report indicates that the two historic period sites will be avoided by project redesign. If that is not feasible, we recommend that they should be subjected to Phase II evaluations. We concur with the report's recommendation that the precontact site, EPW-TRC-3, is not National Register eligible.

The report indicates that 20 percent of the APE has not yet been surveyed due to incomplete project plans. Please submit an addendum report once that additional work has been completed.

If you have any questions, please don't hesitate to contact me.

Sincerely,

Philip A. Perazio, Historic Preservation Program Analyst - Archaeology Unit
Phone: 518-268-2175
e-mail: philip.perazio@parks.ny.gov

via e-mail only

Division for Historic Preservation

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September 25, 2017

James J. Finelli, Historic Preservation Program Analyst
Survey and Evaluation Unit
New York State Office of Parks, Recreation and Historic Preservation
Historic Preservation Field Services Bureau
Peebles Island Resource Center, PO Box 189
Waterford, NY 12188-0189

**RE: Cemeteries Addendum
Historic Architecture Reconnaissance Survey
Eight Point Wind Energy Center, Allegany and Steuben County, New York
Project Review Number: 16PRO0701**

Dear Mr. Finelli,

Per your request of September 18, 2017, TRC Environmental Corporation (TRC) is pleased to provide you with the requested information regarding 24 cemeteries it identified and survived as part of the August 2017 historic architecture reconnaissance survey for the above-referenced project. Individual photos and supporting documentation for each cemetery has been uploaded separately into the Cultural Resource Information System (CRIS) for your review. The approximate ages of three cemeteries (TRC# 1037, 1187, and 1717) have been refined slightly from the original survey report as a result of this Addendum. Please note that one identified resource, the Hauber Cemetery (TRC# 1864) in West Union, was not accessible and not visible for photography at the time of the survey. Documentation concerning this resource has not been uploaded into CRIS, and it remains unevaluated. **Table 1** (attached) lists the individual cemeteries and TRC's initial eligibility recommendations.

Should you have any questions or require additional information, please do not hesitate to contact me at (301) 276-8044, or at phayden@trcsolutions.com.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Philip A. Hayden", is written over a faint, circular blue stamp.

Philip A. Hayden, M.A.
Senior Architectural Historian

cc: David Gil, NextEra
Coke Coakley, NextEra
Brian Schwabenbauer, TRC
Samantha Kranes, TRC
Timothy R. Sara, TRC

Attachment

Table 1: Previously Identified Unevaluated and Newly Identified Cemeteries

Item No.	TRC #	Type	Date	Description	Address	Town	County	Current NRHP Status	Recommended NRHP Status ¹
1	1037	Cemetery	c. 1850	Unnamed Cemetery (Note: Not Accessible)	Behind 3043 Davis Hill Rd	Andover	Allegany	N/A	Not Eligible
2	1042	Cemetery	c. 1930	Gate of Heaven Cemetery	SR 417	Andover	Allegany	N/A	Not Eligible
3	1045	Cemetery	c. 1890	St. Johns Cemetery	Lever Hill Rd	Andover	Allegany	N/A	Not Eligible
4	1878	Cemetery	c. 1900	Hillside Cemetery	North Main St.	Andover	Allegany	N/A	Not Eligible
5	1107	Cemetery	c. 1850	Unnamed Cemetery	Brown Hollow Rd	Greenwood	Steuben	N/A	Not Eligible
6	1126	Cemetery	c. 1890	Krusen Family Cemetery (Note: Previously recorded as part of USN# 10114.000043)	CR 61	Greenwood	Steuben	N/A	Not Eligible
7	1133	Cemetery	c. 1900	Unnamed Cemetery	CR 61	Greenwood	Steuben	N/A	Not Eligible
8	1150	Cemetery	c. 1810	Unnamed Cemetery	Dryden Hill Rd	Greenwood	Steuben	N/A	Not Eligible
9	1156	Cemetery	c. 1870	Unnamed Cemetery	Flynn Rd	Greenwood	Steuben	N/A	Not Eligible
10	1187	Cemetery	c. 1850	Unnamed Cemetery	Rough and Ready Rd	Greenwood	Steuben	N/A	Not Eligible
11	1195	Cemetery	c. 1900	Unnamed Cemetery	Slaight Rd	Greenwood	Steuben	N/A	Not Eligible
12	1209	Cemetery	c. 1875	Greenwood Cemetery	SR 248	Greenwood	Steuben	N/A	Not Eligible
13	1302	Cemetery	c. 1860	Cline Comfort Cemetery	CR 28 Purdy Creek Rd	Hartsville	Steuben	N/A	Not Eligible
14	1385	Cemetery	c. 1860	Pioneer Cemetery	CR 39/Beech Hill Rd	Independence	Allegany	N/A	Not Eligible
15	1495	Cemetery	c. 1860	Whitesville Rural Cemetery	SR 248 Main St	Independence	Allegany	N/A	Not Eligible
16	1671	Cemetery	c. 1900	Unnamed Cemetery	CR 117	Troupsburg	Steuben	N/A	Not Eligible
17	1695	Cemetery	c. 1870	Unnamed Cemetery	Gunn Rd	Troupsburg	Steuben	N/A	Not Eligible
18	1708	Cemetery	c. 1850	Unnamed Cemetery	McAllister Rd	Troupsburg	Steuben	N/A	Not Eligible
19	1717	Cemetery	c. 1830	Potter Cemetery	Potter Rd	Troupsburg	Steuben	N/A	Not Eligible
20	1745	Cemetery	c. 1880	West Union Cemetery	Christian Hollow West Union Rd	West Union	Steuben	N/A	Not Eligible
21	1759	Cemetery	c. 1940	Our Lady of the Valley St. Mary (Note: Associated with c. 1965 Our Lady of the Valley St Mary Church (TRC# 1761))	CR 117 Church St	West Union	Steuben	N/A	Not Eligible
22	1771	Cemetery	c. 1900	Kelly Cemetery	CR 84	West Union	Steuben	N/A	Not Eligible
23	1864	Cemetery	N/A	Hauber Cemetery (Note: Not Accessible; No Photo)	SR 248	West Union	Steuben	N/A	Unevaluated
24	1924	Cemetery	c. 1960	West Union Mennonite Church Cemetery (Note: Associated with c. 1880 West Union Mennonite Church (TRC# 1775))	Saunders Rd and CR 84	West Union	Steuben	N/A	Not Eligible

SR = State Route

CR = County Route

¹ TRC recommendations as of June 20, 2017; subject to OPRHP review and concurrence