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memorandum

To: Mr. Tony Opalka, NYSOPRHP **EDR Project No:** 15033
From: Grant Johnson
Date: July 10, 2015
Reference: Jericho Rise Wind Farm, Franklin County
NYSOPRHP Project Review #07PR04701
Historic Architectural Resources Survey Work Plan

Comments:

On behalf of Jericho Rise Wind Farm, LLC (the Applicant), Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR) is conducting cultural resources studies in support of environmental review and permitting for the Jericho Rise Wind Farm (Project), located in Franklin County, New York. The potential environmental impacts of the proposed Project are being reviewed under the State Environmental Quality Review Act (SEQRA) with the Towns of Chateaugay and Bellmont serving as Co-Lead Agencies. The SEQRA review of the Project began in 2007. EDR is preparing a Supplemental Environmental Impact Statement (SEIS) to build upon the information and analysis presented in the 2008 Draft Environmental Impact Statement (DEIS) that was previously prepared for the Project (Tetra Tech, 2008). This SEIS addresses all changes to the proposed action that have occurred subsequent to the release of the DEIS, and includes additional studies and analyses. This historic resources survey work plan is intended to define an approach for evaluating the Project's potential effect on historic resources and to assist the New York State Office of Parks, Recreation, and Historic Preservation's (NYSOPRHP's) review of the Project.

All cultural resources studies undertaken by EDR in association with the Project will be conducted by professionals who satisfy the qualifications criteria per the Secretary of the Interior's Standards for Historic Preservation (36 CFR 61). The historic resources survey will be conducted in accordance with the *New York State Historic Preservation Office Guidelines for Wind Farm Development Cultural Resources Survey Work* (the *SHPO Wind Guidelines*; NYSOPRHP, 2006) and applicable portions of NYSOPRHP's *Phase 1 Archeological Report Format Requirements* (NYSOPRHP, 2005).

Project Overview

Jericho Rise Wind Farm LLC (the Applicant), a wholly owned subsidiary of EDP Renewables, is proposing to construct a wind energy generation facility (and associated necessary Project infrastructure) in the Towns of Chateaugay and Bellmont in Franklin County, New York (see Figure 1). The current Project Site includes approximately 5,895 acres of leased private lands that are roughly bound by State Route 11 to the north, the Chateaugay River to the east, Brainardsville Road to the south, and the Burke/Chateaugay town boundary to the west (see Figure 2). The Project site consists of open fields, mature forests, areas of successional shrubland and wetlands, with elevations ranging between approximately 800 and 1,560 feet above mean sea level. Land use within the Project site is dominated by

[Landscape Architecture • Civil Engineering • Regulatory Compliance • Ecological Resource Management
Cultural Resource Management • Visual Impact Assessment • Community Planning • Golf Course Architecture]

active and reverting agricultural land. With the exception of the villages of Chateaugay and Burke, to the northeast and west respectively of the Project site, respectively, the area surrounding the Project is primarily undeveloped, with farms and rural residences interspersed along area roadways.

Review and revision of the Project layout has been ongoing during the SEQRA review of the Project. Per the DEIS for the Project (Tetra Tech, 2008), the Project was originally planned to contain up to 53 wind turbines. Subsequent to the release of the DEIS, the Project layout has been further refined (in large part to avoid and/or minimize impacts to wetlands and other environmental factors).

As presently envisioned, The Project will consist of up to 37 wind turbine generators (WTG) each with a nameplate capacity of 2.1 megawatts (MW), for a total anticipated nameplate generating capacity of 77.7 MW. However, to allow for flexibility on final site selection, the Applicant is also evaluating and seeking approval for seven alternate turbine sites. The WTGs that will ultimately be constructed for the Project have not been determined. However, the largest WTGs presently being considered for the Project are the Gamesa G114-2.1 WTGs. For the purpose of presenting a conservative analysis, the assessment of potential environmental impacts discussed herein assumes that the Project will use Gamesa G114-2.1 WTGs. Each WTG consists of three major mechanical components: the tower, nacelle, and rotor. Assuming use of the Gamesa G114-2.1 turbine, the anticipated tower height for the Project, or “hub height” (height from foundation to the rotor hub), is approximately 93 meters (305 feet). The Gamesa G114-2.1 has a rotor diameter of 114 meters (374 feet), resulting in a total height of 150 meters (492 feet).

The Project will also involve construction of approximately 13 miles of gravel access roads, 20.5 miles of collection lines, consisting of 15 miles of underground collection lines and 5.5 miles of overhead collection lines, an interconnection substation in the town of Chateaugay, and one permanent meteorological tower located in the Town of Bellmont. To service the facility, an operations and maintenance building (O&M facility) will house operations personnel, equipment and materials, and provide staff parking. Additionally, the Project will require a temporary laydown yard and construction workspace, including, but not limited to, areas to store Project components (laydown yards), construction vehicle parking areas, and cleared areas for turbine assembly. The proposed locations of Project components are depicted on Figure 2.

Project's Area of Potential Effect (APE) and Study Area

The Project's potential effect on a given historic property would be a change (resulting from the introduction of wind turbines) in the property's visual setting. Therefore, the APE for visual effects on historic resources includes those areas where Project components (including wind turbines) will be visible and where there is a potential for a significant visual effect. Per the *SHPO Wind Guidelines*, the APE for visual impacts on historic properties for wind projects is defined as those areas within 5 miles of proposed turbines which are within the potential viewshed (based on topography) of a given project (NYSOPRHP, 2006). The five-mile-radius study area includes parts of the Towns of Bellmont, Burke, and Chateaugay in Franklin County, and Clinton and Ellenburg in Clinton County (Figure 1).

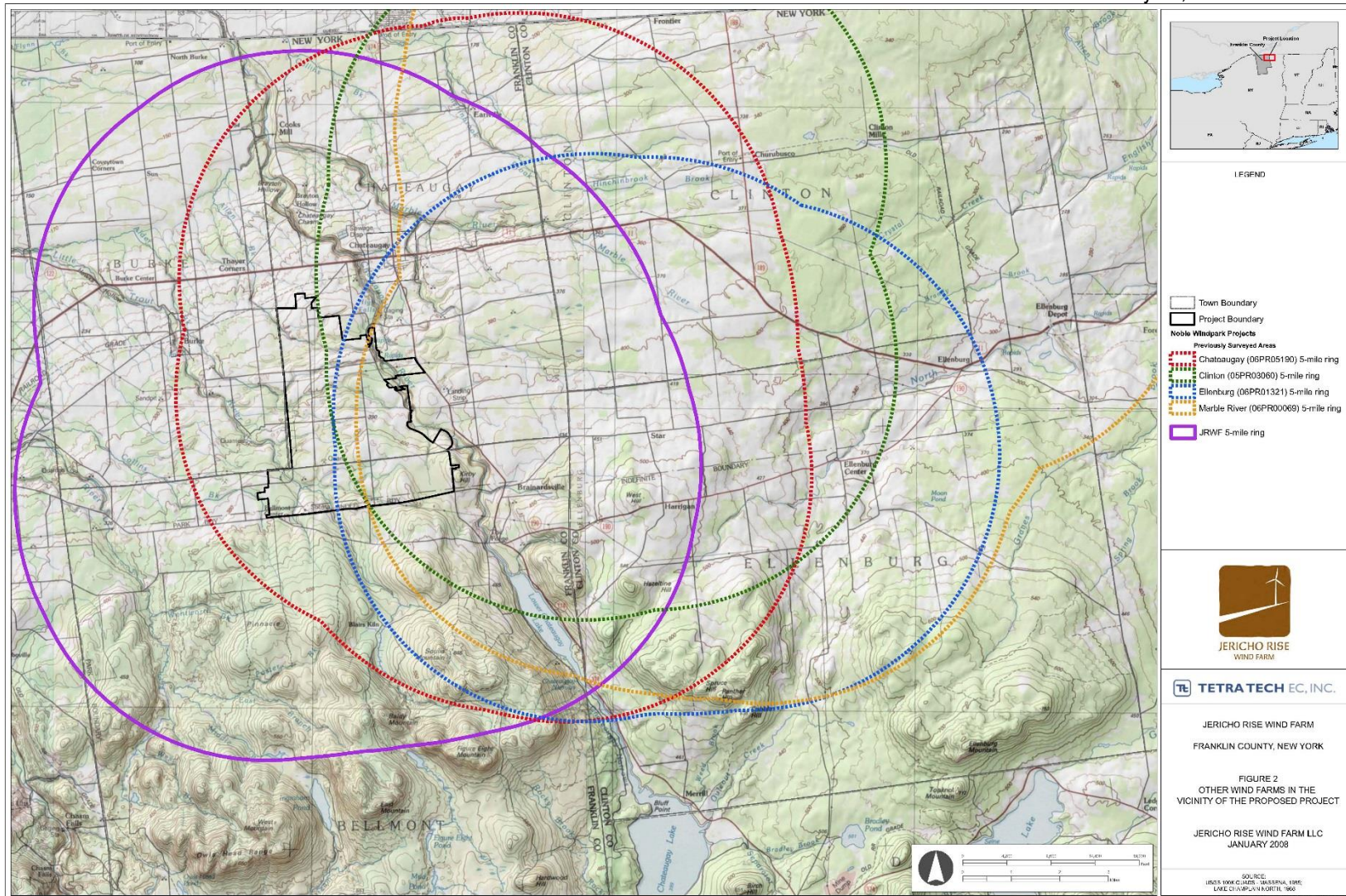
Previous Historic Architectural Surveys

Several previous historic architectural surveys have been conducted in the vicinity of the Jericho Rise Wind Farm, associated with wind projects within Clinton and Franklin Counties. The 2008 DEIS for the Project identified three proposed wind projects within Franklin and Clinton Counties: Marble River Wind Farm, Clinton Ellenburg Windpark, and Chateaugay Belmont Windpark (see Inset 1). Historic architectural surveys have been conducted in association with all of these wind projects as well as Jericho Rise Wind Farm:

- Five-mile architectural surveys were conducted for the Noble Clinton and Noble Ellenburg Windparks (05PR03060 and 06PR01321) in 2006 by Ecology & Environment, Inc. and Panamerican Consultants, Inc.
- A five-mile architectural survey was conducted for the Marble River Wind Farm (06PR00069) in 2007 by John Milner Associates, Inc.
- A five-mile architectural survey was conducted for the Proposed Noble Windpark in Chateaugay and Belmont (06PR5190) in 2007 by Panamerican Consultants, Inc.
- A five-mile architectural survey was conducted for the Jericho Rise Wind Farm (07PR04701) in 2008 by Tetra Tech EC, Inc. It is worth noting that this survey was conducted subsequent to the completion of the DEIS for the Project. The survey report was submitted to NYSOPRHP on March 26, 2008, and included the identification of 90 individual NRHP-eligible historic properties, including a 27-acre portion of the National Historic Landmark Adirondack Park. In a June 10, 2008 letter from NYSOPRHP to the Public Service Commission (PSC), NYSOPRHP indicated its concurrence with the recommendations of NRHP eligibility contained within the Tetra Tech survey, and identified three key loci where visual impacts should be carefully assessed: the Chateaugay Village Historic District, Burke village, and the north end of Lower Chateaugay Lake. In addition, NYSOPRHP noted that several rural agrarian properties and other identified historic resources would be located within the viewshed of the proposed wind turbines, and recommended that visual simulations be prepared in the areas identified above, as well as the Adirondack Park.

Virtually all of the five-mile study area for the Project has previously been surveyed as part of these wind projects (see Inset 1).¹ The eastern portions of the five-mile study area for the Project have been surveyed more than once, with those results summarized in the previous Jericho Rise Wind Farm five-mile survey in 2008. As part of the 2008 five-mile survey for the Jericho Rise Wind Farm, resources previously determined NRHP-eligible were identified and photographed, and only those portions of the APE that had not previously been surveyed were surveyed for historic architectural resources.

¹ Based on the current Project layout. The field survey for the Project and the subsequent report will reflect the final Project layout, and any changes to the layout from this work plan to the time of the survey will be noted.



Inset 1. Figure from previous Historic Architectural Resources Investigation 5-Mile Ring Study for Jericho Rise Wind Farm, Other Wind Farms in the Vicinity of the Proposed Project (Tetra Tech, 2008).

Historic Architectural Survey Work Plan

Task 1: Consult with NYSOPRHP to Confirm the Area of Potential Effect

The *SHPO Wind Guidelines* request that the consultant participate in a meeting to verify the Area of Potential Effect (APE) for visual impacts to historic resources prior to undertaking the historic resources survey. In EDR's experience, the visual APE for historic resources is typically defined as those areas within five miles of the proposed turbines where the turbines are potentially visible based solely on topography. As described above and depicted in Inset 1, all of the five-mile-radius study area for the Project was recently (2006-2008) surveyed for historic resources for several other wind projects.

On June 17, 2015, EDR cultural resources staff conducted research concerning the previous architectural resources surveys in the vicinity of the Project at NYSOPRHP's office in Waterford, NY. During that research visit, EDR met with NYSOPRHP staff to review and discuss the previous historic architectural surveys, as well as the proposed historic architectural resources survey for the revised Jericho Rise Wind Farm study area. During this discussion, it was agreed upon by NYSOPRHP and EDR that due to the considerable amount of recent historic resources surveys that have occurred within the Project APE, no additional survey of buildings located within the APE would be required as part of the current review of the Jericho Rise Wind Farm. In lieu of a new historic resources survey, a field review of previously identified historic resources was proposed, where previously identified historic resources would be photographed and given updated recommendations of NRHP eligibility (where applicable). The plan for this historic architectural resources survey as discussed by NYSOPRHP and EDR is described in greater detail below.

Task 2: Digitization of Previous Historic Architectural Surveys

The locations of all resources previously determined NRHP-eligible as part of the above-listed historic resources surveys will be digitized and mapped using ArcGIS. The NYSOPRHP Cultural Resources Information System (CRIS) website will also be reviewed to identify any additional NRHP-eligible resources not included as part of these surveys, which will also be digitized and mapped. In addition, the locations of any previously surveyed resources within the APE whose NRHP eligibility has not formally been determined will be digitized, and evaluated as part of the field survey (see Task 3). The digitized data will be provided to NYSOPRHP as a shapefile as part of the historic resources survey report submission (see Task 4).

Task 3: Historic Resources Field Survey

EDR will conduct a historic resources survey of the five-mile-radius visual study area of the Project for the purpose of updating photographs and determinations of eligibility for NRHP-eligible resources, as well as previously surveyed resources within the APE whose NRHP eligibility has not formally been determined. The historic resources survey will be conducted by a qualified architectural historian who meets the Secretary of Interior's Standards for Historic Preservation Projects (36 CFR Part 61). Historic resources survey fieldwork will include systematically driving all public roads within the study area to confirm the NRHP-eligibility of structures and properties within the study area previously determined NRHP-eligible or whose NRHP eligibility has not formally been determined. An updated photograph (or photographs) of previously surveyed properties will be taken, and an updated recommendation of NRHP-eligibility will occur where applicable.

If significant changes to materials or form are found to have occurred, or if a property is found to no longer be standing, an updated recommendation of NRHP eligibility will be provided. Previously identified resources whose NRHP eligibility has not formally been determined will be given an updated recommendation of NRHP eligibility. EDR's evaluation of historic resources within the study area will focus on the physical condition and integrity (with respect to design,

materials, feeling, and association) to assess the potential architectural significance of each resource. Note that all properties included in the historic resources survey will be photographed and assessed from public rights of way. The condition and integrity of all resources will be evaluated based solely on the visible exterior property. No inspections or evaluations requiring access to the interior of buildings, or any portion of private property will be conducted as part of this assessment.

Based on discussions at the meeting with NYSOPRHP staff, EDR assumes that no additional historic-architectural resources survey will be necessary within the areas of the APE previously surveyed in 2006-2008. However, if any historic architectural resources of exceptional architectural significance are encountered that have not have previously been surveyed, EDR will document these resources with photographs, description of architectural style and materials, and provide a recommendation of NRHP eligibility.

Due to the dynamic nature of wind projects, changes in Project layout often occur that may affect the five-mile study area. If the Project APE changes in such a way that a portion of the study area has not previously been surveyed, EDR will conduct a survey of these portions of the study area for NRHP-eligible resources. The historic resources survey will identify and document those buildings within the study area that, in the opinion of EDR's architectural historian, appear to satisfy National Register of Historic Places (NRHP) eligibility criteria. When sites that appeared to satisfy NRHP-eligibility criteria are identified, the existing conditions of the property will be documented by EDR's architectural historian. This includes photographs of the building(s) (and property) and field notes describing the style, physical characteristics and materials (e.g., number of stories, plan, external siding, roof, foundation, and sash), condition, physical integrity, and other noteworthy characteristics for each resource.

In accordance with the *SHPO Wind Guidelines*, and based on previous consultation with NYSOPRHP for previous wind projects,² buildings that are not sufficiently old (i.e., are less than 50 years in age), that lack architectural integrity, or otherwise were evaluated by EDR's architectural historian as lacking historical or architectural significance will *not* be included in or documented during the survey.

Task 4: Historic Resources Survey Report

The methods and results of the survey will be summarized in an illustrated report, along with an annotated properties table that will include an entry for each identified property. The annotated properties table will include one or more photographs of each property, a description of the property (name, address, estimated age, architectural style, materials, etc.), an assessment of its condition, and an updated evaluation of NRHP eligibility. The report will also include an analysis of the potential visual effect of the Project on identified properties, including consideration of distance and the effect of vegetation and other landscape features that may screen or minimize views of the Project from historic resources. The visual effects analysis will specifically address impacts within the areas previously identified by NYSOPRHP in the March 26, 2008 letter (Chateaugay Village Historic District, Village of Burke, north end of Lower Chateaugay Lake, and the Adirondack Park NHL), and include visual simulations where appropriate in response to NYSOPRHP concerns regarding impacts to these concentrations of historic resources. The report will also include recommendations for mitigation efforts, if appropriate.

The final report will be provided to NYSOPRHP in digital format via the CRIS website. EDR also anticipates adding historic resources identified during the survey to the CRIS database as part of submitting the report to NYSOPRHP. A GIS shapefile of all previously surveyed historic architectural resources, including name (if applicable), address, USN, and updated determination of eligibility will also be provided via the CRIS website.

² See Historic Resources Survey for Copenhagen Wind Farm (12PR02853) (EDR, 2014).

NYSOPRHP Concurrence with Work Plan

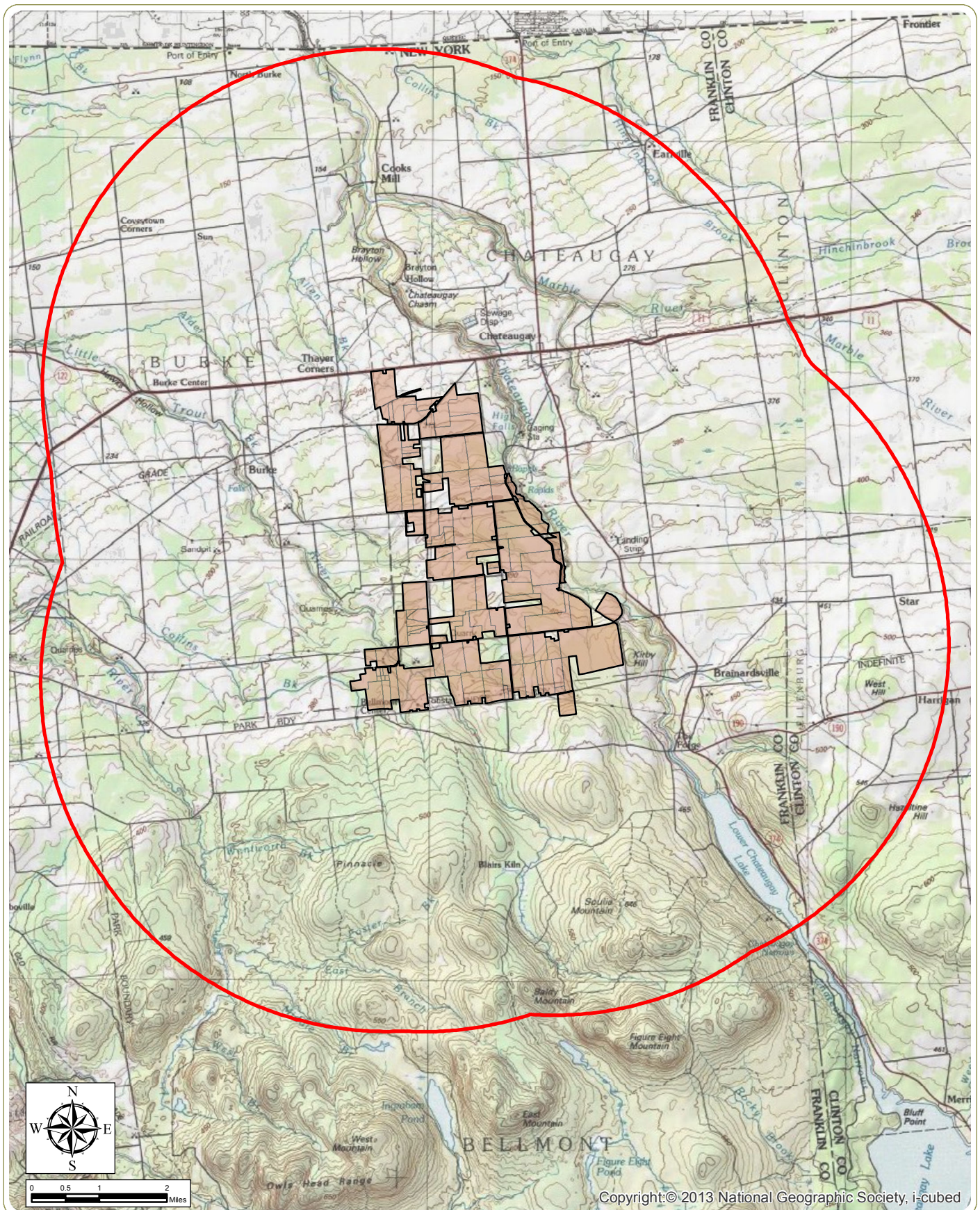
EDR has provided this work plan to NYSOPRHP in advance of conducting the historic architectural resources survey to confirm the visual APE for the project and to ensure that the proposed scope of the survey is consistent with NYSOPRHP's expectations. Please provide a formal response indicating NYSOPRHP's concurrence with and/or comments on the work plan described herein.

If you have any questions or would like to discuss the work plan proposed herein, please contact Grant Johnson at gjohnson@edrdpc.com or Patrick Heaton at pheaton@edrdpc.com, or by phone (for both) at (315) 471-0688.

ATTACHMENTS

Figure 1. Revised Project Site
Figure 2. Revised Project Layout

Copies To: C. Calabrese, A. Branam (EDPR); file.



Jericho Rise Wind Farm

Towns of Chateaugay and Belmont - Franklin County, New York

Figure 1: Revised Project Site

July 2015

Notes: 1. Basemap: ESR ArcGIS Online "USA Topo Maps" Map Service.

2. This is a color graphic. Reproduction in grayscale may misrepresent the data.

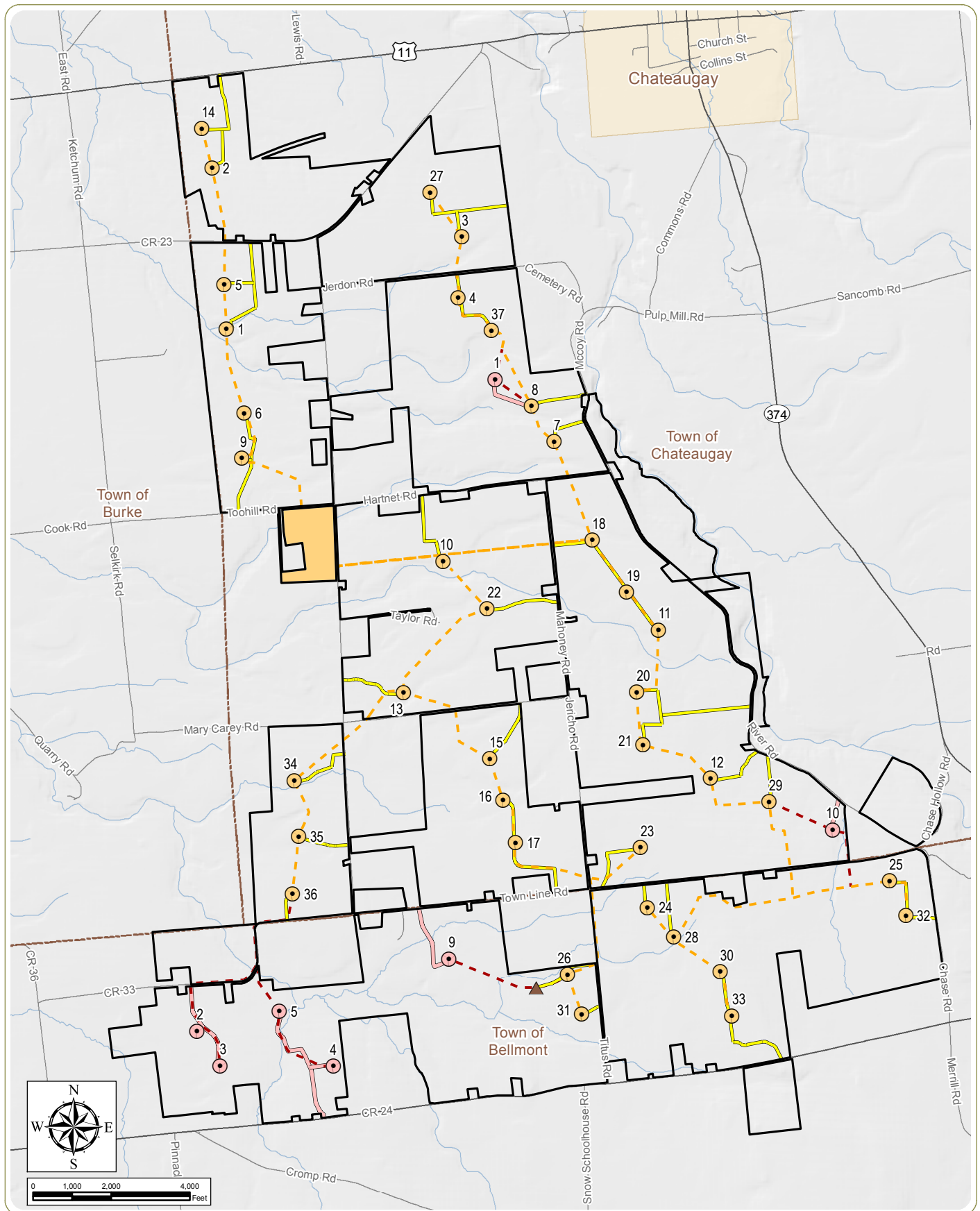
 Five-Mile Study Area

 Project Site



JERICHO RISE
WIND FARM





Jericho Rise Wind Farm

Towns of Chateaugay and Belmont - Franklin County, New York

Figure 2: Revised Project Layout

July 2015

Notes: 1. Basemap: Hillshade derived from USGS digital elevation model data.

2. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Wind Turbine
- Alternate Wind Turbine
- ▲ Met Tower
- - - Buried Collection Line
- - - Alternate Collection Line
- Access Road
- Alternate Access Road
- Substation Parcel
- Project Site
- Town Boundary



JERICHO RISE
WIND FARM

