

## **Attachment C**

# Somerset Solar Facility Simulations for Babcock House and Line of Sight Profile for Smith Residence

## EXISTING CONDITIONS



## SIMULATED CONDITIONS



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf Off*



*No Proposed Screening*



VICINITY MAP

### Photograph Information

Time of photograph: 12:10 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House property looking west toward project area.



## EXISTING CONDITIONS



## SIMULATED CONDITIONS

WITH  
PROPOSED  
SCREENING  
(YEAR 0)



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf Off*



*With Proposed Screening  
Year 0*



VICINITY MAP

### Photograph Information

Time of photograph: 12:10 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House Museum looking west toward project area.



## EXISTING CONDITIONS



## SIMULATED CONDITIONS

WITH  
PROPOSED  
SCREENING  
(YEAR 5)



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf Off*



*With Proposed Screening  
Year 5*



VICINITY MAP

### Photograph Information

Time of photograph: 12:10 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House Museum looking west toward project area.



## EXISTING CONDITIONS



## SIMULATED CONDITIONS



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

Viewpoint 2A

NY 18/Lake Rd  
Location 1

*Leaf On*



*No Proposed Screening*



VICINITY MAP

### Photograph Information

Time of photograph: 11:22 a.m.  
Date of photograph: 06/22/2022  
Weather condition: Sunny  
Viewing direction: North  
Latitude: 43.349001°  
Longitude: -78.613392°  
Photo Location:  
The photo was taken from  
NY-18 (Lake Road) approx. 2,335 ft.  
west of Hosmer Rd., looking North  
toward project area



## EXISTING CONDITIONS



## SIMULATED CONDITIONS



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

Viewpoint 2A

NY 18/Lake Rd  
Location 1

*Leaf Off*



*No Proposed Screening*



VICINITY MAP

### Photograph Information

Time of photograph: 1:02 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: North  
Latitude: 43.349001°  
Longitude: -78.613392°  
Photo Location:  
The photo was taken from NY-18 (Lake Road) approx. 2,335 ft. west of Hosmer Rd., looking North toward project area



## EXISTING CONDITIONS



## SIMULATED CONDITIONS

WITH  
PROPOSED  
SCREENING  
(YEAR 0)



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

Viewpoint 2A

NY 18/Lake Rd  
Location 1

Leaf Off



With Proposed Screening  
Year 0



VICINITY MAP

### Photograph Information

Time of photograph: 1:02 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: North  
Latitude: 43.349001°  
Longitude: -78.613392°  
Photo Location:  
The photo was taken from NY-18 (Lake Road) approx. 2,335 ft. west of Hosmer Rd., looking North toward project area



## EXISTING CONDITIONS



## SIMULATED CONDITIONS

WITH  
PROPOSED  
SCREENING  
(YEAR 5)



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

Viewpoint 2A

NY 18/Lake Rd  
Location 1

Leaf Off



With Proposed Screening  
Year 5



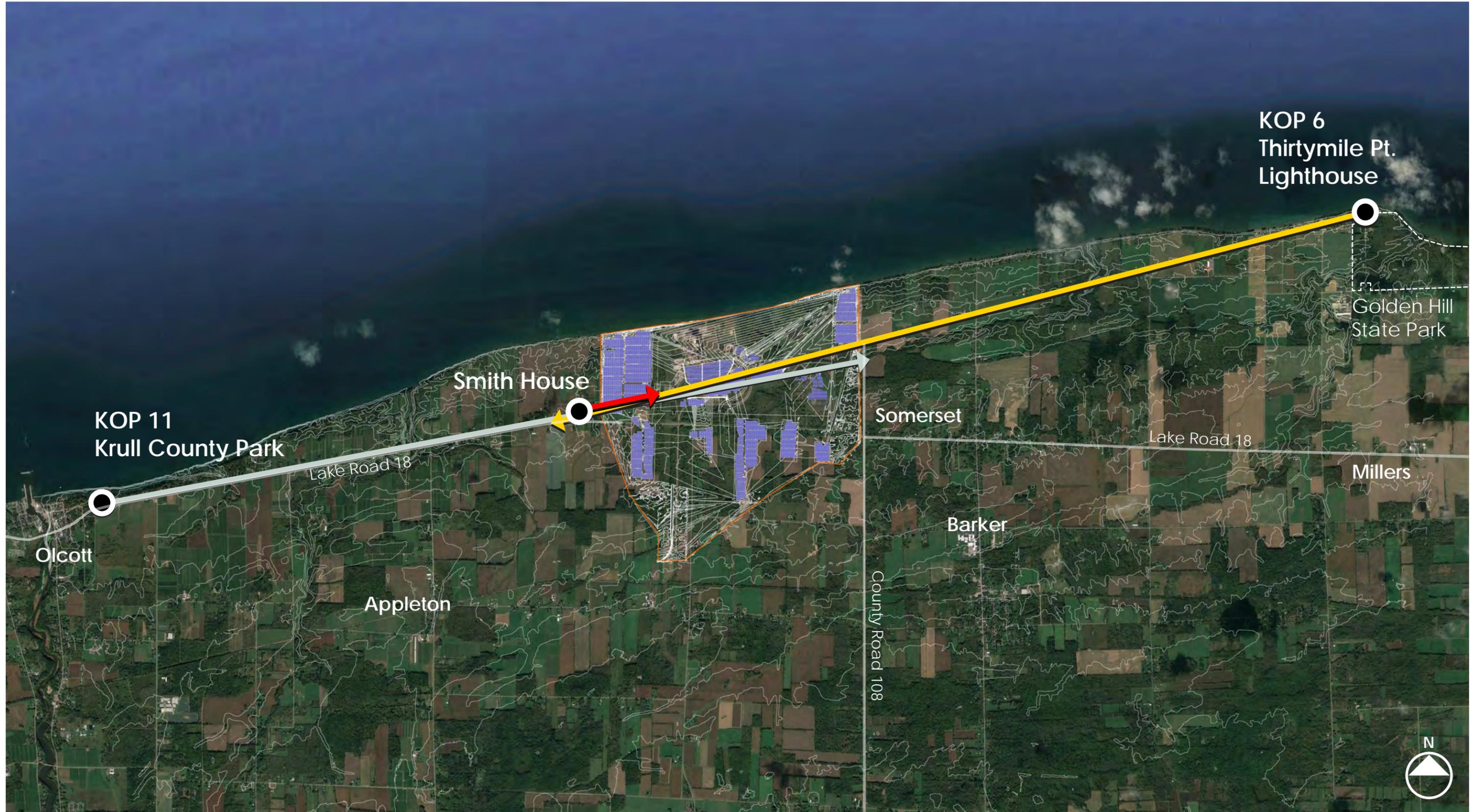
VICINITY MAP

### Photograph Information

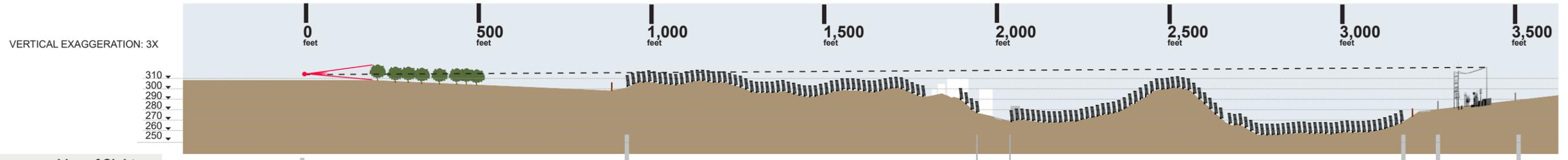
Time of photograph: 1:02 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: North  
Latitude: 43.349001°  
Longitude: -78.613392°  
Photo Location:  
The photo was taken from NY-18 (Lake Road) approx. 2,335 ft. west of Hosmer Rd., looking North toward project area



# LINE OF SIGHT WITH KEY PROFILE



# LINE OF SIGHT : SMITH HOUSE - SUBSTATION

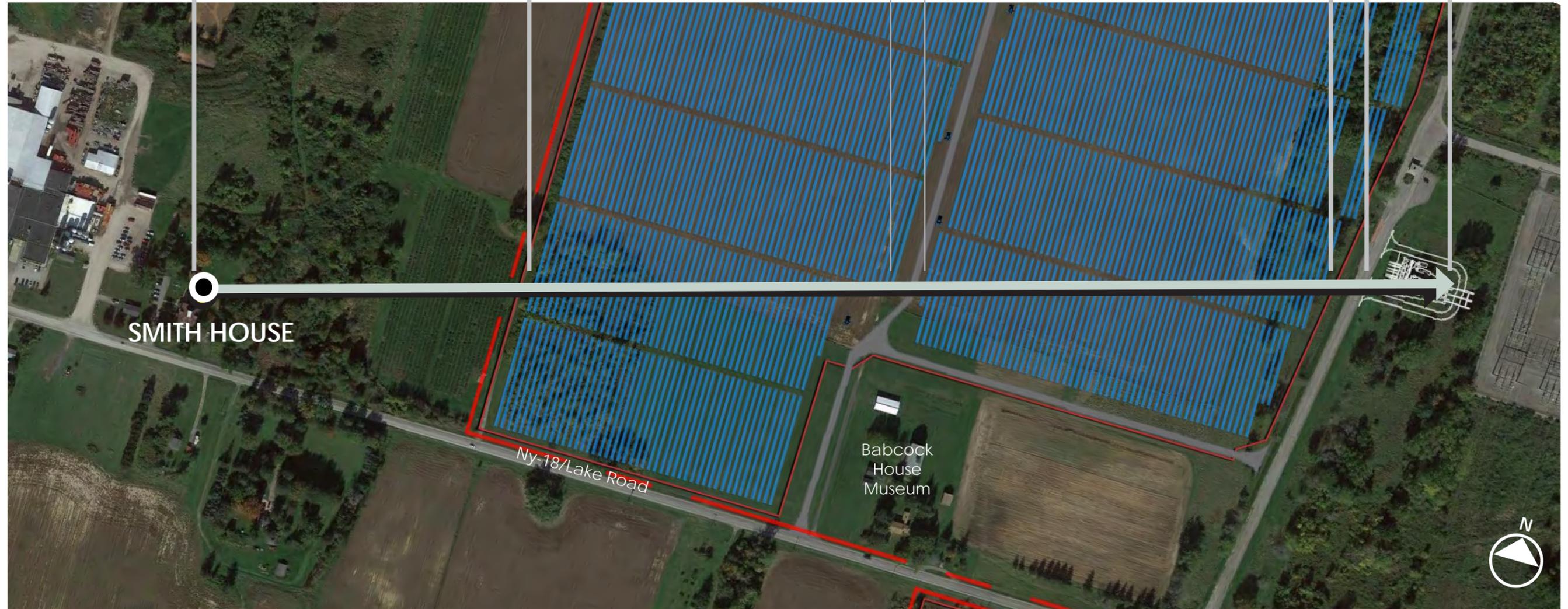


Line of Sight  
Viewer Height  
Approximately 5-6ft

Proposed Arrays

Proposed Arrays

Proposed Substation





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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

October 26, 2022

Robert Jacoby  
Tetra Tech, Inc.  
1000 The American Rd.  
Morris Plains, NJ 7950

Re: ORES  
Somerset Solar Project (140-200 MW/~540 of 1410 Acres)  
7725 Lake Road, Town of Somerset, Niagara County, NY  
21PR00981

Dear Robert Jacoby:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to Executive Law Section 94-c and its implementing regulations (19 NYCRR Part 900).

Our office has reviewed the requested photo simulations, site plans and elevation drawings received on October 4, 2022. From that review, it is the Technical Preservation Unit's opinion that the proposed solar installation would have a significant visual impact on the setting of the State and National Register eligible Babcock House (7449 Lake Road). As shown in the photo simulations and Area 1 on the 8/5/2022 Site Overview, the proposed installation would introduce substantial visual elements out of character with the rural, lakeshore setting of the historic property.

We request submission of an alternatives analysis document to consider alternate siting or other changes to the project that may minimize the visual impacts to the Babcock House. We note that while the use of vegetative buffers may aid in softening the visual impacts, they alone would likely not be sufficient to avoid adverse effects. Relocation or placement of arrays so that they are not visible or are minimally visible from the Babcock House is recommended. If no prudent and feasible alternatives are identified in the analysis. Discussions regarding appropriate mitigation measures can begin.

Before we can officially render a determination, our Archaeology Unit has an outstanding information request for revisions to the Phase 1B report submitted for this project that must be fulfilled. Please see Josalyn Ferguson's February 28, 2022 letter.

We request the additional information be provided via our Cultural Resource Information System (CRIS) at <https://parks.ny.gov/shpo/online-tools/> . Once on the CRIS site, you can log in as a guest and choose "submit" at the very top menu. Next choose "submit new information for an existing project." You will need the project number and your e-mail address. If you have any questions, I am best reached by email.

Sincerely,

A handwritten signature in black ink, appearing to read 'DR', enclosed in a thin black rectangular border.

Derek Rohde  
Historic Site Restoration Coordinator  
518-275-5745 | [Derek.Rohde@parks.ny.gov](mailto:Derek.Rohde@parks.ny.gov)



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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

November 9, 2022

Robert Jacoby  
Tetra Tech, Inc.  
1000 The American Rd.  
Morris Plains, NJ 7950

Re: ORES  
Somerset Solar Project (140-200 MW/~540 of 1410 Acres)  
7725 Lake Road, Town of Somerset, Niagara County, NY  
21PR00981

Dear Robert Jacoby:

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 IB archaeological survey report for the Somerset Solar Project (140-200 MW/~540 of 1410 Acres) project (21PR00981) prepared by Tetra Tech, Inc., Consulting Archaeologist (September 2022; 22SR00080). OPRHP concurs with the report recommendation that no additional archaeological investigation is warranted.

Please be advised that this project is still under review by our Technical Services Unit.

If you have any questions, I can be reached at [Bradley.Russell@parks.ny.gov](mailto:Bradley.Russell@parks.ny.gov).

Sincerely,

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

January 26, 2023

Derek Rohde  
Historic Site Restoration Coordinator  
Division for Historic Preservation  
P.O. Box 189  
Waterford, NY 12188-0189  
Submitted via email to: [derek.rohde@parks.ny.gov](mailto:derek.rohde@parks.ny.gov)

**SUBJECT:** ORES  
Somerset Solar Project (140-200 MW/~540 of 1410 Acres)  
7725 Lake Road, Town of Somerset, Niagara County, NY  
21PR00981

Dear Derek,

Thank you for your follow-up comments regarding the potential visual impact of the proposed Somerset Solar Facility on the setting of the historic Babcock House (7449 Lake Road). Tetra Tech, Inc., on behalf of The AES Corporation, Inc. (AES), has addressed these comments in the attached materials. Tetra Tech's responses and references to the additional documentation requested are provided below in italics to facilitate Office of Parks, Recreation, and Historic Preservation's (OPRHP's) full evaluation of the visual elements introduced by the solar installation and the mitigation measures proposed by AES to preserve neighborhood aesthetics. The following statements were included in your correspondence dated October 26, 2022:

1. Our office has reviewed the requested photo simulations, site plans and elevation drawings received on October 4, 2022. From that review, it is the Technical Preservation Unit's opinion that the proposed solar installation would have a significant visual impact on the setting of the State and National Register eligible Babcock House (7449 Lake Road). As shown in the photo simulations and Area 1 on the 8/5/2022 Site Overview, the proposed installation would introduce substantial visual elements out of character with the rural, lakeshore setting of the historic property.

*Response: While the property on which the Babcock House resides is close to Lake Ontario and is adjacent to agricultural land to the west, referring to the neighborhood character as a "rural, lakeshore setting" is not a completely accurate description. The parcel is zoned as part of the Town of Somerset's Planned Unit Development (PUD) District. Parcels that are designated for PUD zoning include the Babcock House and surrounding field, and the former Somerset Coal Fired Power Generating Station (Somerset Station), its associated landfill and previously disturbed industrial lands.*

*These properties are currently owned by Somerset Operating Company, LLC. The Babcock House property is bounded by the shore of Lake Ontario to the north, the former Somerset Station facility to the east, agricultural land to the west and NY State Route 18 to the south. It is also in close proximity (less than 0.5 mile) to parcels zoned Industrial to both the west and south.*

*A photographic log containing additional views from Babcock House to the Facility and from the Facility to Babcock House is included in Attachment A. Looking toward the Facility area from the east side of Babcock House, the industrial influence of the former energy generating plant on the character of the neighborhood is clearly visible from Viewpoint 1. The views looking east and north from Babcock House are dominated by the plant's substation, outbuildings and its 613-foot smokestack which can be seen from as far away as the City of Buffalo. The photographs do not convey the additional direct and significant effects of noise and stack emissions that would have been present during the 40-year operational life of the coal-powered plant. Coal-fired power plants release fine (2.5-micron) particle pollution in a complex mixture of soot, heavy metals, sulfur dioxide, and nitrogen oxides that have serious and lasting health effects on the surrounding community and those downwind of the plant. At its peak, Somerset Station released over 10,000 tons of these particles and over two million tons of carbon dioxide on an annual basis<sup>1</sup>, with a nearly constant visual impact to the local region, including Babcock House, from visible smokestack emissions that occurred throughout its operational life (see Viewpoint 7 in Attachment A). In contrast, a solar energy facility provides clean, renewable energy that directly supports New York State's climate action goals.*

*The PUD district is intended by the Town of Somerset to be used for mixed use "sustainable development" and an "economic and service base" that is of benefit to the community.<sup>2</sup> As stated in the Town's Comprehensive Plan:*

The power plant site is currently zoned PUD and under that zoning would only allow the present power plant and related accessory uses on that site. This site is shown as Industrial/Business on the Vision Map to provide greater flexibility for the Town to entertain a rezoning that would allow other industrial and business uses on this site....

---

<sup>1</sup> "Emissions by Plant and by Region". U.S. Energy Information Administration, Annual Data, Release Date November 1, 2021. Available online at: [Emissions by plant and by region \(eia.gov\)](https://www.eia.gov). Accessed December 2022.

<sup>2</sup> Article XV Planned Unit Development (PUD) District. Town of Somerset Zoning Code. Available online at: [Town of Somerset, NY Planned Unit Development \(PUD\) District \(ecode360.com\)](https://www.ecode360.com). Accessed December 2022.

The area directly west of the power plant site [known as the Babcock House property] has been designated for new business development in support of economic development for the Town. Shown in orange on the Vision Map, the concept is to facilitate business development at this location, possibly through getting the site designated as “Shovel-Ready” under New York State’s business development program.<sup>3</sup>

*Somerset Solar will be in alignment with the Town’s Comprehensive Plan and desired development benefits while also providing the added benefit of effectively repurposing a brownfield area that is not suitable for most other recreational or commercial uses.*

*Regarding visual elements of the solar installation, the height profile of the proposed arrays will be minimal in contrast to the horizon of the surrounding landscape and will follow its contour. This is especially true to the north where topography slopes downward to Lake Ontario. Vegetated buffers containing evergreen plantings will be added to enhance visual aesthetics from Babcock House and State Route 18 / Lake Road (see the response to discussion point #4 below).*

*Regarding the rural/agricultural character of the neighborhood, a solar facility is one of the least intrusive developments that could be placed in a PUD district. Most of the noise and visual disturbance associated with the Facility will be temporary during the construction phase. Post-construction, the Facility will not generate noise impacts or increased traffic. Moreover, the soil composition and general topography of the Facility Site will not be substantially altered, allowing it to be fully restored upon the eventual decommissioning of the Facility. The layout has maximized use of open land for Facility infrastructure, including repurposing of the brownfield areas north of Route 18, as well as agricultural open areas.*

2. We request submission of an alternatives analysis document to consider alternate siting or other changes to the project that may minimize the visual impacts to the Babcock House. We note that while the use of vegetative buffers may aid in softening the visual impacts, they alone would likely not be sufficient to avoid adverse effects. Relocation or placement of arrays so that they are not visible or are minimally visible from the Babcock House is recommended. If no prudent and feasible alternatives are identified in the analysis. Discussions regarding appropriate mitigation measures can begin.

---

<sup>3</sup> Section V Implementation, D. Vision Plan. Town of Somerset 2016 Comprehensive Plan Update. Available online at: [final\\_plan\\_update\\_adopted\\_2016.pdf \(somersetny.org\)](https://www.somersetny.org/files/2022/01/final_plan_update_adopted_2016.pdf). Accessed December 2022.

*Response: No reasonable and available alternative site for the Facility is owned or under option by the Applicant. An alternative site that could generate the same nameplate capacity as that proposed for Somerset Solar would require a duplicate costly investment of time and money to arrange similar landowner and community participation, seek municipal approval of land use, identify proximity to transmission lines with sufficient capacity for interconnection to the electric grid, and conduct numerous studies to confirm site characteristics that enable development and allow avoidance or mitigation of potential environmental impacts. Somerset Solar, LLC is a private applicant and does not have the power of eminent domain or the financial capital to procure alternative solar sites.*

*In preliminary evaluations, the Applicant focused on the following site conditions and criteria that weighed upon the site being especially suitable for development of a solar facility:*

- A decommissioned, non-renewable electric generating facility (Somerset Station), with existing interconnection/transmission infrastructure; brownfield; landfill; and disturbed land for solar use.*
- Strong solar energy potential – Applicant confirmed, through an initial screening process using statewide solar resource mapping, that the Project Site has a strong solar energy potential. The area selected for development is primarily open (large portions having been previously developed and other areas containing open agricultural fields) and by maximizing use of these open areas for the Facility, significant tree clearing and associated environmental impacts would not be required.*
- Provision of clean distributed solar energy generated closer to end users, which increases efficiency and reduces carbon pollution compared to other fossil-fueled generation facilities, and also improves grid resiliency potentially curtailing the need for costly transmission investments. This directly supports the draft Scoping Plan developed by New York State Climate Action Council which identifies a directive of having 6,000 megawatts (MW) of distributed solar energy generation by 2025<sup>4</sup>.*
- Proximity of adequate electrical interconnection – The ability of the Project Site to allow for on-site electrical interconnection via a point of interconnection (POI) to the existing New York State Electric and Gas Corporation 345-kilovolt Kintigh Substation was an extremely*

---

<sup>4</sup> New York State Climate Action Council. 2021. Draft Scoping Plan. 341 pp. Available online at: [Climate Action Council Draft Scoping Plan \(ny.gov\)](https://www.climateactioncouncil.ny.gov/draft-scoping-plan). Accessed December 13, 2022.

*favorable site attribute. The Kintigh Substation is located inside the lease area for the Project Site, and the POI is proposed wholly within the Project Site, inside the Kintigh Substation via an existing 345 kilovolt spare bay. This has limited the transmission line length to 159 feet, thereby limiting environmental impacts from the transmission line connection and reusing previously disturbed lands via use of an existing substation facility.*

- *Compatible land use – The Project Site consists of relatively open, flat parcels of adequate size to support a 125-MW solar energy project. The predominance of open areas within the Project Site allows for maximizing sun exposure. The Project Site’s setting reflects a low density of surrounding development with considerable opportunity for buffering from surrounding land uses.*
- *Willing landowners and Siting – Sufficient acreage was secured at the Project Site for siting the Facility in a manner that minimizes environmental impacts.*
- *Limited environmental and engineering constraints – Initial screening review was conducted based on readily available public data to evaluate such issues as mapped wetlands, indicating that considerable usable area for development potentially existed within the Project Site, pending more detailed field evaluations. In addition, the surrounding roadway network appeared adequate to support delivery of equipment and construction activities. Once the Facility is constructed, little need for community services will result. Due to the historic use and disturbance associated with a large portion of the Project Site, new areas of disturbance were minimized, and are primarily limited to areas requiring forest clearing and grading necessary to construct the Facility.*

*The selected Facility Site, including the Babcock House parcel, met the key criteria described above. Additional studies were done to determine optimal configuration and design of the arrays and supporting infrastructure. An original site plan (Attachment B) was designed to construct an approximately 200 MW facility. The original footprint was subsequently reduced by 94 acres to accommodate the currently proposed 125 MW facility, with a focus on maximizing usable space while also minimizing environmental impacts to sensitive natural resources, as well as reducing potential visual and noise impacts to nearby residences.*

*Siting of the Facility infrastructure has utilized site-specific wetland, waterbody, terrestrial habitat and wildlife observation and data (including threatened and endangered species that have the potential to occur) to minimize potential impacts to the environment. The proposed Facility will not result in permanent impacts to surface waters, and the following measures have been taken to ensure protection of sensitive resources and potential archaeological resources:*

- *Wetland impacts have been reduced (to less than 0.1 acre of permanent impact to jurisdictional wetlands), such that a pre-construction notification to the United States Army Corps of Engineers for wetland impacts covered under a Nationwide Permit is not expected to be required.*
- *Potential impacts to state- and federally listed threatened and endangered species have been avoided such that specific species or habitat avoidance measures are not expected to be required during construction.*
- *To mitigate for potential take of northern harrier (*Circus hudsonius*) wintering habitat as identified by the Office of Renewable Energy Siting (ORES), a net conservation benefit plan has been developed (for an off-site location) and will be approved by the ORES and the New York State Department of Environmental Conservation prior to initiating construction activities.*
- *Archaeological surveys completed for the Project Site did not identify any significant archaeological sites, with concurrence on these surveys and results received from OPRHP (see response to comment #3 below).*

*Throughout the project planning process, the Applicant has continuously refined the layout of the Facility to avoid, minimize, and mitigate impacts to sensitive resources wherever practicable, including consideration of community concerns and the neighborhood character. During preliminary discussions with Babcock House representatives regarding the planned Facility, the Applicant agreed to set aside approximately 10 acres of open land adjacent to the east side of the Babcock House for their continued use (as shown on Attachment C). Solar arrays in the vicinity of Babcock House will not significantly alter the combination of agricultural and industrial elements that already coexist in the neighborhood. Somerset Solar will in fact represent an improvement over decades of noise and pollution from the decommissioned Somerset Station. At the same time, the Facility will add renewable solar capacity to the New York Independent System Operator Regional Capacity Requirements, thus displacing capacities from polluting fossil fuel energy sources. To efficiently achieve these objectives, there are no appropriate, economically viable alternatives, in terms of land use zoning and proximity to electrical infrastructure, to that offered by the parcel on which the Babcock House is located.*

3. Before we can officially render a determination, our Archaeology Unit has an outstanding information request for revisions to the Phase 1B report submitted for this project that must be fulfilled. Please see Josalyn Ferguson's February 28, 2022 letter.

*Response: Tetra Tech, Inc., on behalf of AES, submitted a revised Phase 1B report to the Division for Historic Preservation on November 7, 2022. A letter was received November 9, 2022, from Bradley W.*

*Russell, Ph.D., stating that the Division for Historic Preservation concurs with the Phase 1B recommendation that no additional archaeological investigation is warranted for the Somerset Solar Facility.*

4. We request the additional information be provided via our Cultural Resource Information System (CRIS) at <https://parks.ny.gov/shpo/online-tools/>. Once on the CRIS site, you can log in as a guest and choose "submit" at the very top menu. Next choose "submit new information for an existing project." You will need the project number and your e-mail address. If you have any questions, I am best reached by email.

*Response: To mitigate concerns regarding potential visual impacts to the Babcock House from the solar installation, enhanced landscaping has been added to the engineering design of the Facility Site. These improvements include increasing the density of the landscape plantings proposed for visual screening in Year 0, as shown in the Facility plan provided in Attachment C. Additional offset rows of vegetation along both sides of the access road to the west and north of the museum site will expedite the screening effect of plantings over the long-term. A landscaping plan, which will ensure the long-term success of plantings through monitoring and restoration if needed, will be approved by ORES prior to initiating construction. Simulations that show existing conditions, and implementation of the proposed landscaping plans for Year 0 and Year 5 post-construction are provided in Attachment D. Attachment C shows a gap in landscaping vegetation along the east side of the access road to the west, which has been included to allow road access to the barn located on the Babcock House property. Denser plantings for the landscaping design and planting of larger sized plants in Year 0 was considered to increase the screening effect of the plantings earlier in the post-construction period. Consideration was given to reducing the interval of plantings for the larger trees and shrubs from 14-15-foot on center, to as close as 7-foot on center. Additionally, use of larger sized plantings in Year 0 also was considered. Both of these options were ultimately determined not to be viable options, as providing adequate spacing between the landscaping plantings will enhance their long-term success for health and growth, reducing the risk of die off from crowding and competition (denser plantings) and transplant shock (larger plantings).*

*Recent conversations with the local Somerset Historical Society, who oversees operations and maintenance of the Babcock House, have been receptive to the project proposals, include the mitigation measures proposed to minimize visual impacts to the Babcock House. In addition to the measures described above, the Applicant has offered to fund up to three Babcock House community events and provide an approximately 2-acre parking area to support these events. The precise location*

*of the parking area in relation to planned infrastructure is still being refined, but it will be located west of the Babcock House in the open field area that they currently use for parking. A future iteration of the site plan will identify the finalized location of the proposed parking area. A letter of support for the Facility is anticipated to be received from the Somerset Historical Society, and a copy will be provided once available.*

In summary, the Somerset Solar Project Site, including the Babcock House property, was carefully considered and evaluated to meet rigorous criteria for economic viability, environmental suitability and access to infrastructure necessary to efficiently support community and state goals for transition to carbon-free energy generation. The original site design has gone through multiple reviews with regulatory representatives and local Town of Somerset and citizen stakeholders, including discussions with the Somerset Historical Society. At each step, the design has been modified to eliminate or minimize environmental and aesthetic impacts to the project area and surrounding neighborhood. The Babcock House is located in the middle of a neighborhood defined by a mix of agricultural and industrial elements and is itself part of the Town of Somerset's PUD. The Somerset Solar Facility will not only remediate and provide revenue for a brownfield but will also provide a clean and environmentally friendly alternative to the former coal-powered energy generation plant that has dominated the skyline along the shoreline of Lake Ontario in the Town of Somerset since 1983.

We look forward to receipt of your comments on the accompanying materials provided as requested, to complete OPRHP's review of impacts to the setting of the Babcock House.

Sincerely,

Robert M. Jacoby, M.A., RPA  
Tetra Tech, Cultural Resources Specialist

cc: H. Moaveni (ORES)  
P. Grant and M. Farrell (AES)  
L. Rivard (Tetra Tech)



TETRA TECH

**Attachment A**  
Somerset Solar Facility  
Babcock House Photographic Log

**PHOTOGRAPHIC LOG**  
**Somerset Solar**  
**Niagara County, NY**



<b>Viewpoint 1:</b>	View of former coal plant, Somerset Station, from the rear yard of Babcock House, looking northeast.  October 2022  Source: Tetra Tech, Inc.
---------------------	--



**PHOTOGRAPHIC LOG**  
**Somerset Solar**  
**Niagara County, NY**



<b>Viewpoint 2:</b>	View of former coal plant, Somerset Station, from northwest corner of the rear yard of Babcock House, looking northeast.  December 1, 2022  Source: The AES Corporation, Inc.
---------------------	---



**PHOTOGRAPHIC LOG  
Somerset Solar  
Niagara County, NY**



<b>Viewpoint 3:</b>	Looking north from the east side of Babcock House grounds, with Lake Ontario visible in the distance.  December 1, 2022  Source: The AES Corporation, Inc.
---------------------	--



**PHOTOGRAPHIC LOG  
Somerset Solar  
Niagara County, NY**



**Viewpoint 4:**

Looking east, from east side of Babcock House with portions of the Kintigh Substation visible on the left side and the associated transmission line visible in the distance.

December 1, 2022

Source: The AES Corporation, Inc.



**PHOTOGRAPHIC LOG**  
**Somerset Solar**  
**Niagara County, NY**



<b>Viewpoint 5:</b>	Looking southwest towards the rear of the Babcock House from the northwest corner of the Kintigh Substation.
	December 1, 2022
	Source: The AES Corporation, Inc.



**PHOTOGRAPHIC LOG**  
**Somerset Solar**  
**Niagara County, NY**



**Viewpoint 6:**

Looking southwest towards Route 18 from the rear yard of the Babcock House.

June 16, 2021

Source: The AES Corporation, Inc.



PHOTOGRAPHIC LOG  
Somerset Solar  
Niagara County, NY



**Viewpoint 7:**

Looking northeast towards the Babcock House and the former coal plant, Somerset Station, from Route 18.

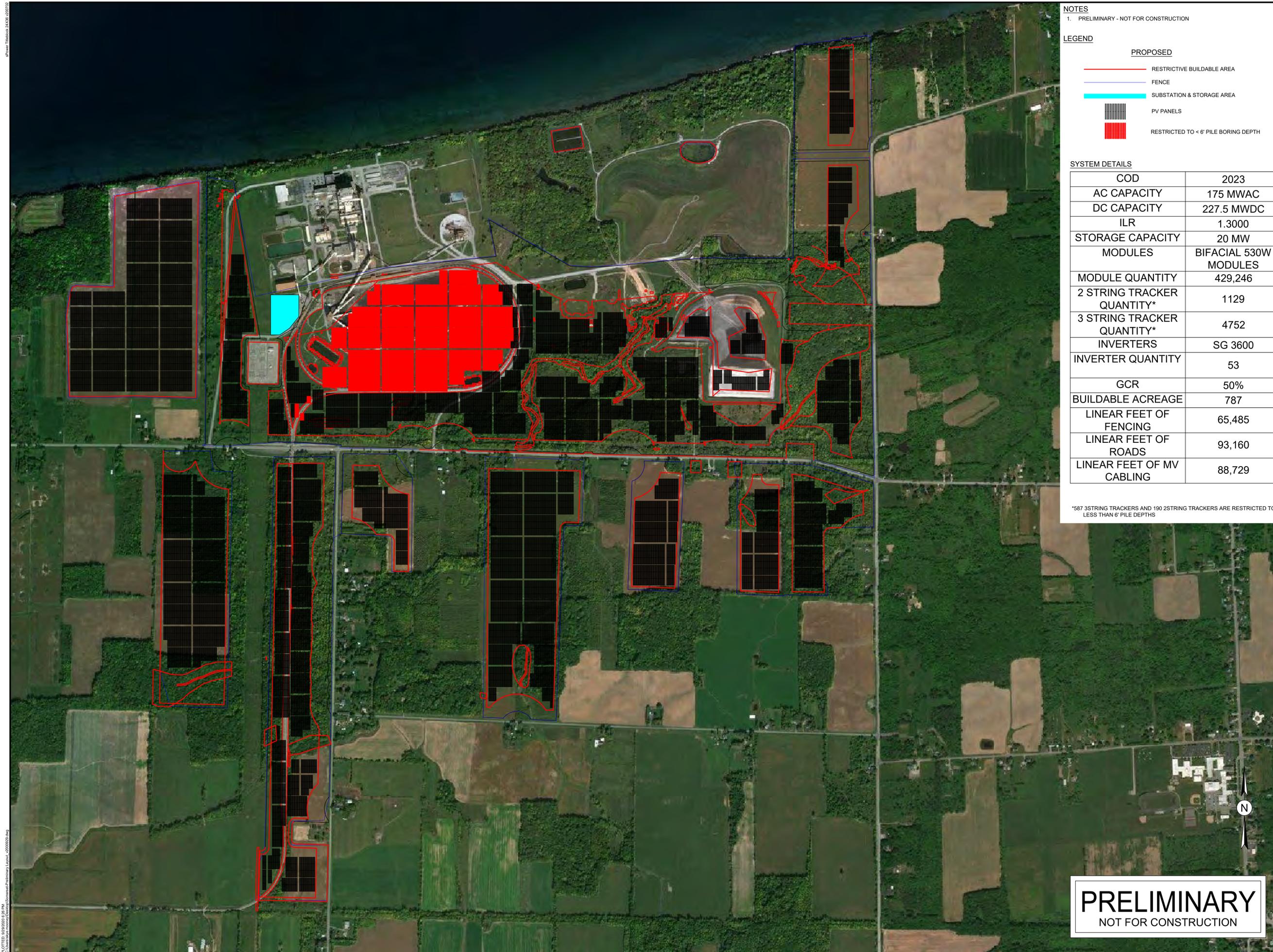
March 20, 2020

Source: Barnard, A. 2020. *New York's Last Coal-Fired Power Plant Is Closing*. The New York Times. Accessed at [New York's Last Coal-Fired Power Plant Is Closing - The New York Times \(nytimes.com\)](https://www.nytimes.com/2020/03/19/us/politics/new-yorks-last-coal-fired-power-plant-is-closing.html).



**Attachment B**

**Somerset Solar Facility**  
**Original Site Plan Proposal for a 200-Megawatt**  
**Facility**



**NOTES**  
1. PRELIMINARY - NOT FOR CONSTRUCTION

**LEGEND**

<b>PROPOSED</b>	
<span style="color: red;">—</span>	RESTRICTIVE BUILDABLE AREA
<span style="color: blue;">—</span>	FENCE
<span style="color: cyan;">—</span>	SUBSTATION & STORAGE AREA
	PV PANELS
	RESTRICTED TO < 6' PILE BORING DEPTH

**SYSTEM DETAILS**

COD	2023
AC CAPACITY	175 MWAC
DC CAPACITY	227.5 MWDC
ILR	1.3000
STORAGE CAPACITY	20 MW
MODULES	BIFACIAL 530W MODULES
MODULE QUANTITY	429,246
2 STRING TRACKER QUANTITY*	1129
3 STRING TRACKER QUANTITY*	4752
INVERTERS	SG 3600
INVERTER QUANTITY	53
GCR	50%
BUILDABLE ACREAGE	787
LINEAR FEET OF FENCING	65,485
LINEAR FEET OF ROADS	93,160
LINEAR FEET OF MV CABLING	88,729

\*587 3STRING TRACKERS AND 190 2STRING TRACKERS ARE RESTRICTED TO LESS THAN 6' PILE DEPTHS

**S-POWER**  
An AES and AIMCo Company

2180 South 1300 East  
Suite 600  
Salt Lake City, UT 84106-2749  
(801) 679 - 3500

PE STAMP:

KEY PLAN:



**REVISIONS:**

NO.	DATE	DESCRIPTION

PROJECT TITLE:

**SOMERSET SOLAR**

PROJECT LOCATION:

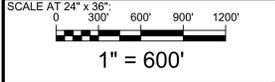
**NIAGARA COUNTY, NY**

SHEET TITLE & DESCRIPTION:

**PRELIMINARY LAYOUT**

**RESTRICTIVE BUILDABLE AREA - CLASS 3 EPC**

PROJ NUM:	SU20.0012
DES:	S.MOONEY
DWN:	S.MOONEY
CHK:	
APV:	
DATE:	9/29/2020



SHEET NO:	0	REV:	D
-----------	---	------	---

**PRELIMINARY**  
NOT FOR CONSTRUCTION



TETRA TECH

## **Attachment C**

# Somerset Solar Facility Landscaping Plans for Babcock House

**KEY PLAN:**



**REVISIONS:**

NO.	DATE	DESCRIPTION
A	08/05/2022	FOR REVIEW
B	12/12/2022	IFP

**PROJECT TITLE:**

**SOMERSET SOLAR PROJECT**

**PROJECT LOCATION:**

**LAKE ROAD SOMERSET, NY AREAS 1 & 2**

**SHEET TITLE & DESCRIPTION:**

**LANDSCAPING PLAN**

**PRELIMINARY**  
NOT FOR CONSTRUCTION

PROJ NUM:	SU20.0012
DES:	RCD
DWN:	APC
CHK:	JPP/MAH
APV:	BMS
DATE:	08/05/2022

SCALE AT 22" x 34"

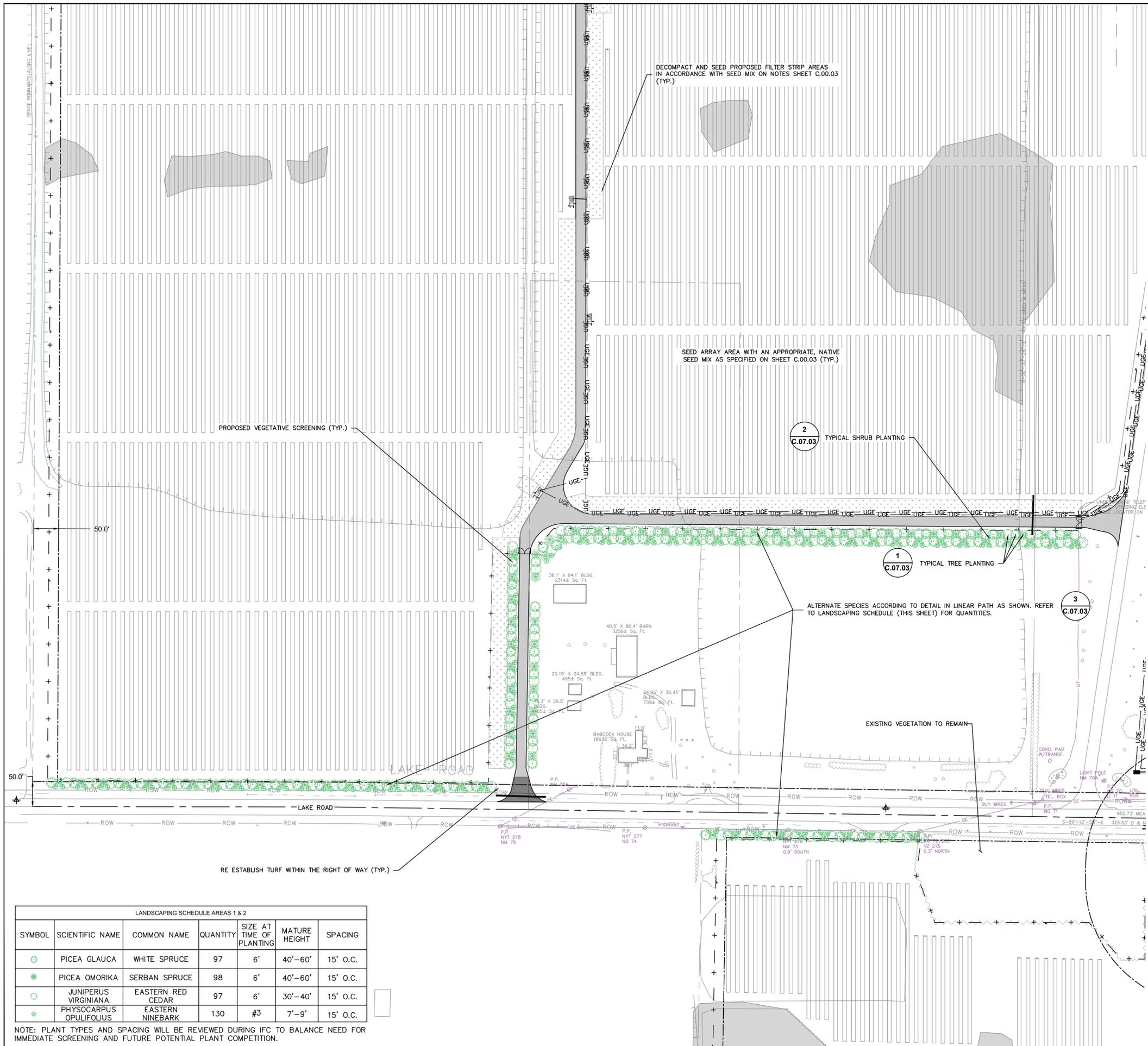
**AS SHOWN**

SHEET NO: **PV-C.05.01**

REV: **B**

**LEGEND**

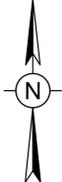
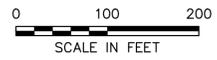
- PROPERTY LINE
- BUILDING SETBACK (94-C)
- EXISTING EASEMENTS
- 50' SENSITIVE AREA BUFFER
- EXISTING LOTLINES
- EXISTING GRAVEL DRIVE
- EXISTING RIGHT OF WAY
- EXISTING DRAINAGE DITCH
- EXISTING WATER EDGE
- APPROXIMATE TOP OF STREAM BANK
- EXISTING FENCE
- EXISTING GUIDERAIL
- EXISTING AGRICULTURE FIELD
- EXISTING TREE LINE
- EXISTING BRUSH LINE
- EXISTING RAILROAD
- EXISTING PIPELINE
- EXISTING ELECTRIC TRANSMISSION LINE
- EXISTING OVERHEAD ELECTRIC
- EXISTING UNDERGROUND ELECTRIC
- EXISTING UTILITY POLE
- EXISTING GUY WIRE
- EXISTING HYDRANT
- SURVEY CONTROL POINT
- DELINEATED WETLAND (USACE)
- DELINEATED WETLAND (STATE/USACE)
- DELINEATED WETLAND (NO JURISDICTION)
- DELINEATED DRAINAGE FEATURE
- 100 FT DELINEATED WETLAND BUFFER
- 50 FT STREAM BUFFER FROM TOP OF BANK
- PROPOSED TREE LINE
- PROPOSED BRUSH LINE
- PROPOSED CHAIN LINK FENCE
- PROPOSED AGRICULTURAL FENCE
- PROPOSED ACCESS ROAD
- PROPOSED GRASSED FILTER STRIP
- PROPOSED SOLAR ARRAY (TRACKER)
- PROPOSED SOLAR ARRAY (FIXED TILT)
- PROPOSED VEGETATIVE SCREENING
- PROPOSED UNDERGROUND ELECTRIC TRENCH PATH
- PROPOSED AC WIRE PATH



LANDSCAPING SCHEDULE AREAS 1 & 2

SYMBOL	SCIENTIFIC NAME	COMMON NAME	QUANTITY	SIZE AT TIME OF PLANTING	MATURE HEIGHT	SPACING
	PICEA GLAUCA	WHITE SPRUCE	97	6'	40'-60'	15' O.C.
	PICEA OMORIKA	SERBAN SPRUCE	98	6'	40'-60'	15' O.C.
	JUNIPERUS VIRGINIANA	EASTERN RED CEDAR	97	6'	30'-40'	15' O.C.
	PHYSOCARPUS OPULIFOLIUS	EASTERN NINEBARK	130	#3	7'-9'	15' O.C.

NOTE: PLANT TYPES AND SPACING WILL BE REVIEWED DURING IFC TO BALANCE NEED FOR IMMEDIATE SCREENING AND FUTURE POTENTIAL PLANT COMPETITION.





TETRA TECH

## **Attachment D**

# Somerset Solar Facility Visual Simulations for Babcock House

# VISUAL SIMULATION

## VIEWPOINT 1

### BABCOCK HOUSE MUSEUM

SOMERSET  
SOLAR  
PROJECT



## EXISTING CONDITIONS



## SIMULATED CONDITIONS



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf On*



*No Proposed Screening*



VICINITY MAP

### Photograph Information

Time of photograph: 10:39 a.m.  
Date of photograph: 06/22/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House property looking west toward project area.



## EXISTING CONDITIONS



## SIMULATED CONDITIONS

WITH  
PROPOSED  
SCREENING  
(YEAR 0)



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf On*



*With Proposed Screening  
Year 0*



VICINITY MAP

### Photograph Information

Time of photograph: 10:39 a.m.  
Date of photograph: 06/22/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House property looking west toward project area.



## EXISTING CONDITIONS



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf On*



*With Proposed Screening  
Year 5*



VICINITY MAP

### Photograph Information

Time of photograph: 10:39 a.m.  
Date of photograph: 06/22/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House property looking west toward project area.

## SIMULATED CONDITIONS

WITH  
PROPOSED  
SCREENING  
(YEAR 5)



## EXISTING CONDITIONS



## SIMULATED CONDITIONS



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf Off*



*No Proposed Screening*



VICINITY MAP

### Photograph Information

Time of photograph: 12:10 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House property looking west toward project area.



## EXISTING CONDITIONS



## SIMULATED CONDITIONS

WITH  
PROPOSED  
SCREENING  
(YEAR 0)



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf Off*



*With Proposed Screening  
Year 0*



VICINITY MAP

### Photograph Information

Time of photograph: 12:10 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House Museum looking west toward project area.



## EXISTING CONDITIONS



## SIMULATED CONDITIONS

WITH  
PROPOSED  
SCREENING  
(YEAR 5)



## SOMERSET SOLAR PROJECT

### VISUAL SIMULATION

#### Viewpoint 1

Babcock House Museum

*Leaf Off*



*With Proposed Screening  
Year 5*



VICINITY MAP

### Photograph Information

Time of photograph: 12:10 p.m.  
Date of photograph: 04/29/2022  
Weather condition: Sunny  
Viewing direction: West  
Latitude: 43.349703°  
Longitude: -78.615066°  
Photo Location:  
The photo was taken from Babcock House Museum looking west toward project area.





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

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

February 15, 2023

Robert Jacoby  
Tetra Tech, Inc.  
1000 The American Rd.  
Morris Plains, NJ 7950

Re: ORES  
Somerset Solar Project (140-200 MW/~540 of 1410 Acres)  
7725 Lake Road, Town of Somerset, Niagara County, NY  
21PR00981

Dear Robert Jacoby:

Thank you for continuing to consult with the Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted materials in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law). These comments are those of the Division for Historic Preservation and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to Executive Law Section 94-c and its implementing regulations (19 NYCRR Part 900)

Our office has reviewed Tetra Tech's January 26, 2023 response to our request for additional information, regarding the solar installation proposed adjacent to the State and National Register eligible Babcock House – at 7449 Lake Road. We note a vegetative screening plan along with mitigation for the Somerset Historical Society has been proposed to minimize impacts that the solar installation will have on the historic Babcock House. Based upon our review, it is the OPRHP's opinion that this project will have No Adverse Impact on historic or archaeological resources, provided the following conditions can be met:

1. The impact minimization measures presented in the January 26, 2023 letter must be carried out including but not limited to:
  - a. A landscaping plan, which will ensure the long-term success of plantings through monitoring and restoration if needed, will be approved by ORES.
  - b. The Applicant will fund three Somerset Historical Society/Babcock House community events.
  - c. An approximately 2-acre area to the west of the Babcock house will be retained for parking. It must not be paved.

- d. A copy of a letter of support for the Facility from the Somerset Historical Society, and a copy will be provided prior to initiating construction.

If you have any questions, I am best reached by email.

Sincerely,

A handwritten signature in black ink, appearing to read 'DR', enclosed in a thin black rectangular border.

Derek Rohde  
Historic Site Restoration Coordinator  
518-275-5745 | [Derek.Rohde@parks.ny.gov](mailto:Derek.Rohde@parks.ny.gov)