

Attachment N

**Revised Appendix 9-2.
OPRHP Project-Related Correspondence**

June 24, 2020

Daniel Mackay, 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: Riverside Solar, LLC – Riverside Solar Project

Dear Mr. Mackay,

Riverside Solar, LLC (the Applicant) proposes to construct the Riverside Solar Project (Project) under Article 10 of the Public Service Law (PSL) or under Section 94-c of the New York Executive Law. The Project will have a generating capacity of approximately 100 megawatts (MW) of power located on land in the Towns of Lyme and Brownville, Jefferson County, New York (**Figure 1**) (Project Area).

The Project may consist of tracking technology PV panels installed on low-profile racking systems mounted on poles driven directly into the ground. Inverters, which collect the electricity by the panels and convert it from direct current to alternating current, are spaced throughout the Project. The substation will take the power from the inverters and step it up to match the voltage of the electrical grid. A protective fence will surround the Project. Temporary laydown and staging areas will be used during construction to store and position vehicles and equipment. The final solar array specification, as well as locations of arrays, will be finalized as part of micro-siting efforts. Riverside Solar will interconnect to the power grid via a line tap to the existing Lyme to Lyme Tap 115-kV line.

TRC Companies (TRC) has been retained by the Applicant to provide environmental review and licensing services in support of the Project. The purpose of this letter is to initiate formal consultation with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) in determining potential impacts to cultural resources that could result from the Project. TRC will also be undertaking cultural resource studies/surveys (Archaeology and Historic Architecture), as required, in support of Project review. To that end, TRC plans to conduct Phase IA and IB archaeological studies (as determined in consultation with your office) and a historic architectural survey in advance of proposed construction to identify potential impacts to cultural resources.

Archaeology

The objective of the Phase IA study will be to identify the archaeological sensitivity of the Project Area through review of known archaeological data, archival data, site file information, and previous cultural surveys. The goal of this review will be to identify where archaeological field testing (Phase IB survey) may be needed to identify archaeological resources within the Area of Potential Effect (APE). For archaeological resources, the APE is defined as a location where significant ground disturbance may occur, including the construction of access roads, work spaces, buried electric collection lines, and electrical interconnection facilities. It is anticipated that the installation of posts for solar panels, as well



as fencing, will be conducted by pile-driver or similar device and not constitute a significant ground disturbance.

The Project Area is split into two discrete areas, identified as the Western and Eastern Project Areas. For the Western Project Area, based on a review of the Cultural Resource Information System (CRIS), a portion of the Project Area is identified as archaeologically sensitive. Four previously recorded archaeological sites are located within a one-mile radius of the Western Project Area, none of which have been recorded within the Project Area (**Figure 2; Table 1**). Four New York State Museum (NYSM) Areas (Areas 3575, 7414, 3580, and 3494) are located within a one-mile radius of the Western Project Area as are two NYSM Sites (Site 7416 and 3434). None of the NYSM Areas or Sites are located within the Project Area. Two cemeteries are noted on CRIS: Freeman Cemetery and an Unnamed Cemetery. Both are at least 0.2 miles from the Project Area.

Four archaeological surveys have been conducted within a one-mile radius, none of which are within the Western Project Area. Eleven consultation projects have been conducted within a one-mile radius, none of which are within the Project Area.

Table 1: Previously Recorded Archaeological Sites within One Mile of Western Project Area

Site Number	Site Type	NRHP-Eligibility	Distance from Project Area
04513.000116	Historic, unknown	Undetermined	0.61 mi northwest
04513.000117	Historic, unknown	Undetermined	0.61 mi northwest
04548.000062	Historic, industrial	Undetermined	0.77 mi northwest
04548.000073	Historic, unknown	Undetermined	0.72 mi northwest
NSYM 7416	n/a	n/a	0.64 mi north
NYSM 3434	n/a	n/a	0.69 mi northwest

For the Eastern Project Area, based on a review of CRIS, the Project Area is not identified as archaeologically sensitive, though archaeological sensitive areas are noted within a one-mile radius. One previously recorded archaeological site is located within a one-mile radius of the Eastern Project Area: an historic domestic site that was recommended not eligible for inclusion in the National Register of Historic Places (NRHP) (**Figure 3; Table 2**). No NYSM Areas or Sites have been identified within one mile of the Eastern Project Area. No cemeteries are located within a one-mile radius.

Two archaeological surveys have been conducted within a one-mile radius, none of which are within the Eastern Project Area. Five consultation projects have been conducted within a one-mile radius, none of which are within the Project Area.

Table 2: Previously Recorded Archaeological Sites within One Mile of Eastern Project Area

Site Number	Site Type	NRHP-Eligibility	Distance from Project Area
04504.000074	Historic, domestic	Not Eligible	0.93 mi southeast



Should a Phase IB survey be recommended by your office, the Applicant will conduct the study in accordance with the *New York Archaeological Council's Standards for Cultural Resource Investigations and the Curation of Archaeological Collections in New York State (1994)*, and the *State Historic Preservation Office Phase I Archaeological Report Format Requirements (2005)*.

Historic Architecture

The APE for above-ground resources is defined as the geographic area or areas within which the undertaking may directly or indirectly cause changes in the character or use of historic properties. The APE for historic architecture is determined in relation to the scale of the undertaking, including new construction, improvements, or demolitions to be made during operation and maintenance of the Project.

Based on a review of CRIS, there are no previously recorded, above-ground architectural resources within the Project Areas. Results of a CRIS search of a one-mile radius of the Western Project Area identified 55 previously surveyed architectural resources, of which eight (8) are NRHP-listed, 12 are NRHP-eligible, 33 have been determined not eligible for NRHP listing, and two (2) have undetermined eligibility status (**Table 3**). These results include an NRHP-listed building district, the Chaumont Historic District (USN 4548.000116), and the NRHP-listed Cedar Grove Cemetery (USN 04548.000036). Results of a CRIS search of a one-mile radius of the Eastern Project Area identified no previously surveyed architectural resources.

Table 3: Previously Recorded Architectural Resources within One Mile of Western Project Area

USN	Name	Eligibility Status
04548.000001	LERAY-CLARK HOUSE/EVANS-GAIGE/DILLENBACK - 27655 EVANS ST	Listed
04548.000003	CHAUMONT HOUSE - 11616 MAIN ST	Listed
04548.000037	GEORGE HOUSE - 27405 WASHINGTON ST	Listed
04548.000038	GEORGE BROTHERS BUILDING - 27428 Mill St	Listed
04548.000116	Chaumont Historic District	Listed
04548.000036	Cedar Grove Cemetery	Listed
04548.000024	Chaumont Railroad Station	Listed
04548.000039	Chaumont Grange Hall & Dairymen's League Building	Listed
04513.000122	27707 Water St	Eligible
04513.000123	27605 Water St	Eligible
04513.000124	27587 Water St	Eligible
04513.000125	27375 Washington St	Eligible
04513.000126	27487 Washington St	Eligible
04513.000127	27490 Washington St	Eligible
04548.000034	St. Paul's ME Church - 27487 WASHINGTON ST	Eligible
04548.000069	1-1/2 story gabled ell plan - 27605 Water St	Eligible
04548.000070	1-1/2 story gable front residence - 27587 Water St	Eligible
04548.000071	2-story gable-front w/1-story porch - 27375 Washington St	Eligible
04548.000072	1-1/2 story, gable front, side-hall residence - 27490 Washington St	Eligible
04548.000100	11792 NY 12E	Eligible



USN	Name	Eligibility Status
04504.000046	16518 WITT RD	Not Eligible
04504.000057	26842 SMITH RD	Not Eligible
04504.000079	Hilts - 16429 Witt Rd 13622	Not Eligible
04548.000029	PLUNDER HOUSE (Demolished 2007) - 12221 MAIN ST (NY 12)	Not Eligible
04548.000063	Lyme Free Library - 12165 Main St.	Not Eligible
04548.000064	residence - 12418 NY 12E	Not Eligible
04548.000082	BIN 1010120 - NY 12E	Not Eligible
04548.000089	11677 NY 12E	Not Eligible
04548.000090	11696 NY 12E	Not Eligible
04548.000091	11702 NY 12E	Not Eligible
04548.000092	11736 NY 12E	Not Eligible
04548.000093	11742 NY 12E	Not Eligible
04548.000094	11757 NY 12E	Not Eligible
04548.000095	11760 NY 12E	Not Eligible
04548.000096	11764 NY 12E	Not Eligible
04548.000097	11768 NY 12E	Not Eligible
04548.000098	11771 NY 12E	Not Eligible
04548.000099	11787 NY 12E	Not Eligible
04548.000101	11793 NY 12E	Not Eligible
04548.000102	11802-06 NY 12E	Not Eligible
04548.000103	11828 NY 12E	Not Eligible
04548.000104	27651 Water St	Not Eligible
04548.000105	27663-65 Water St	Not Eligible
04548.000106	27669 Water St	Not Eligible
04548.000107	27670 Water St	Not Eligible
04548.000108	27675 Water St	Not Eligible
04548.000109	27683 Water St	Not Eligible
04548.000110	27691 Water St	Not Eligible
04548.000111	27702 Water St	Not Eligible
04548.000112	27638 Evans St	Not Eligible
04548.000113	27660 Evans St	Not Eligible
04548.000114	27561 Church St	Not Eligible
04548.000115	US Post office, modern - 12061 NY 12E	Not Eligible
04548.000074	Main School Building, old but altered - 11868 Academy St	Undetermined
04548.000117	MeKeel - 8066 county route 125 13622	Undetermined

The Western Project Area is located adjacent to and partially within the Village of Chaumont. The Eastern Project Area is located approximately seven miles east of the Village of Chaumont near Perch Lake. The Western Project Area contains primarily cleared parcels, with smaller wooded areas, tilled agricultural fields, and small streams. Review of contemporary aerial photography reveals two potential architectural resources within the Western Project Area, both farms on Case Road. The Eastern Project Area contains primarily cleared



parcels, with smaller wooded areas and tilled agricultural fields. Review of contemporary aerial photography reveals one house within the Eastern Project Area. These resources have not previously been surveyed. Project design is not finalized and physical impacts to above-ground resources in the Project Area are unknown.

The APE for direct and indirect effects includes the Project Area and those areas farther removed in distance where Project components will be visible and where there is a potential for a significant visual effect. Per the procedures set forth in 16 NYCRR § 1000.2 (ar), the Study Area to be used for above-ground resource analysis should generally include areas within a radius of at least five miles of the Project Area boundaries.

Based on previous surveys of large solar energy projects that used a two-mile Study Area approved by OPRHP, a two-mile radius Study Area may also be appropriate for this Project. The APE may be refined further to include areas that fall within the potential Project Area viewshed (i.e., those areas from which the Project is potentially visible) within the defined Study Area. The final Study Area and APE will be determined in consultation with your office. A five-mile radius of the Project Area includes parts of the Towns of Lyme, Brownville, Hounsfield, Clayton, and Orleans; and the Villages of Chaumont (in Lyme) and Dexter (in Brownville). A two-mile Study Area would include the same localities, except for the Town of Hounsfield and the Village of Dexter.

Recommendations

Archaeology

The Project Area is characterized as undisturbed and has not been subject to previous archaeological study. Should your office determine that a Phase IB survey is warranted, TRC assumes that as with similar projects, the survey would be limited to areas of significant ground disturbance.

Historic Architecture

There are three potential architectural resources within the Project Areas, of indeterminate construction dates and which have not been previously surveyed. Several unassessed resources are also present in the vicinity of the Project Area. TRC looks forward to your review of this information to determine the need for further study of potential Project effects.

We look forward to continued consultation with your office as well as submittal of detailed cultural resource work plans, as needed, 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@trccompanies.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Timothy R. Sara".

Timothy R. Sara, RPA
Program Manager, Cultural Resources

cc: Rachel Silva, TRC
Brett Hastings, Geronimo Energy

file 373222.0000.0000



Attachments

Figure 1: General Project Location in Jefferson County, New York.

Figure 2: Western Project Area Superimposed OPRHP CRIS Webviewer Results for Archaeologically Sensitive Areas (accessed April 2020).

Figure 3: Eastern Project Area Superimposed OPRHP CRIS Webviewer Results for Archaeologically Sensitive Areas (accessed April 2020).

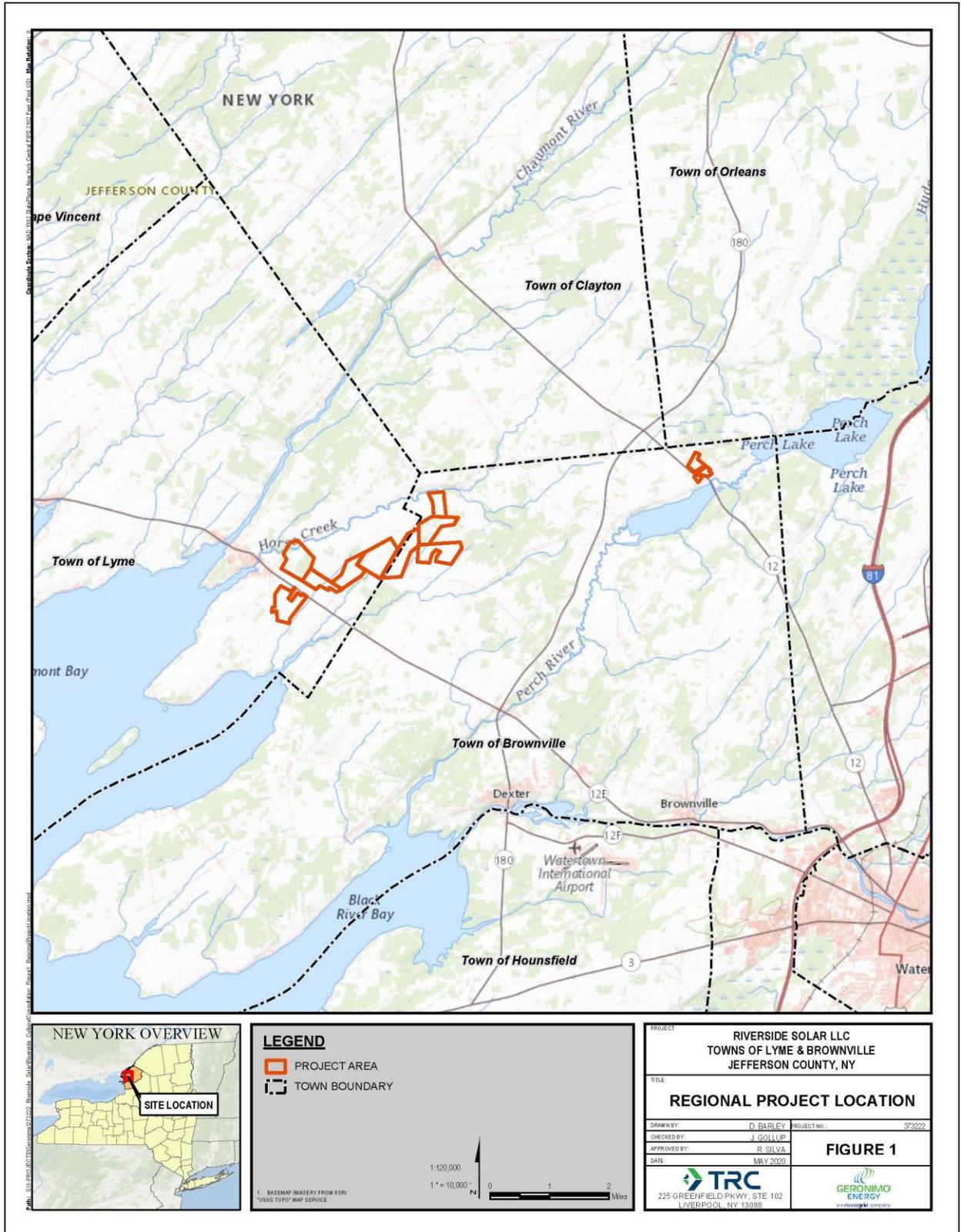


Figure 1: General Project Location in Jefferson County, New York.

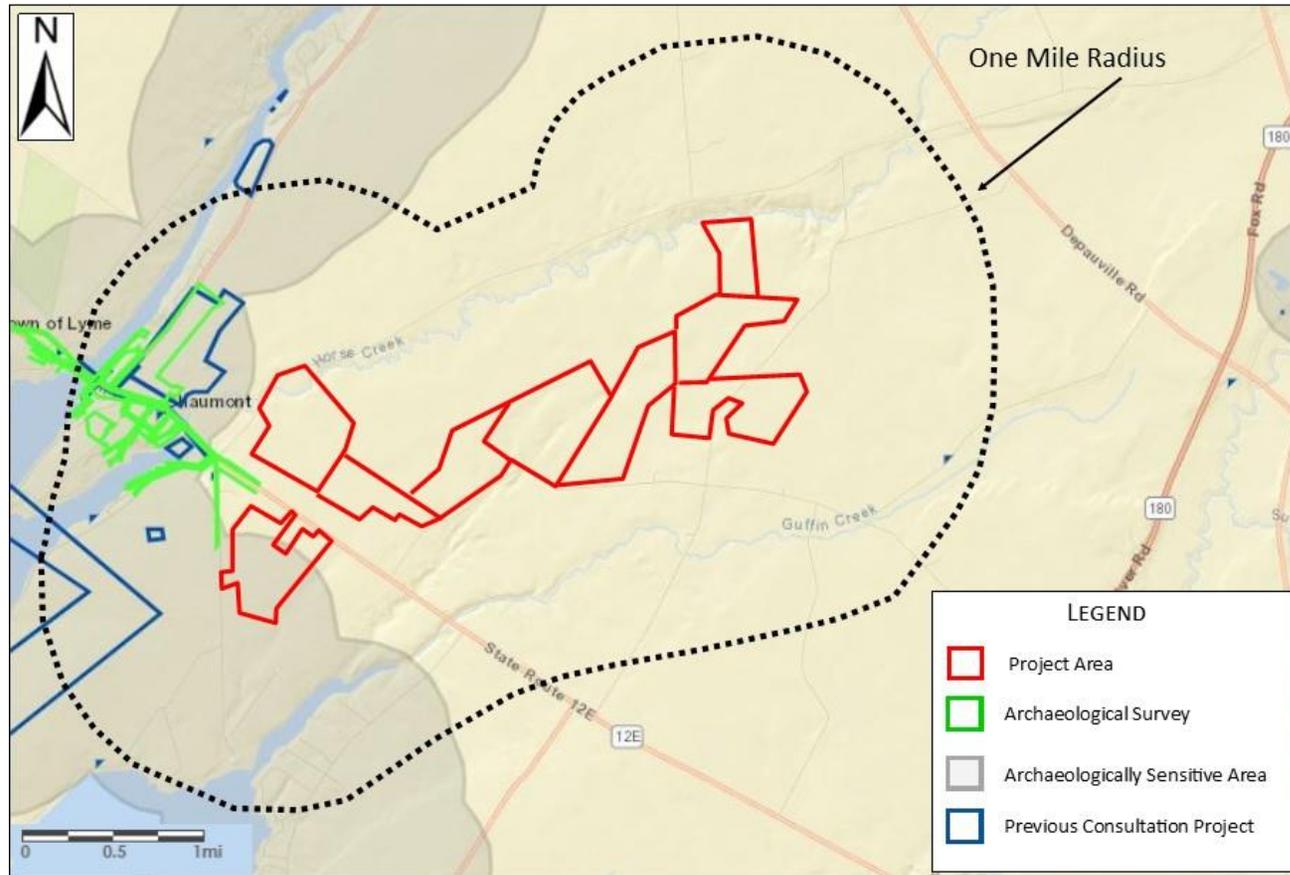


Figure 2: Western Project Area Superimposed OPRHP CRIS Webviewer Results for Archaeologically Sensitive Areas and NRHP-Eligible within a One-Mile Radius (*accessed April 2020*).

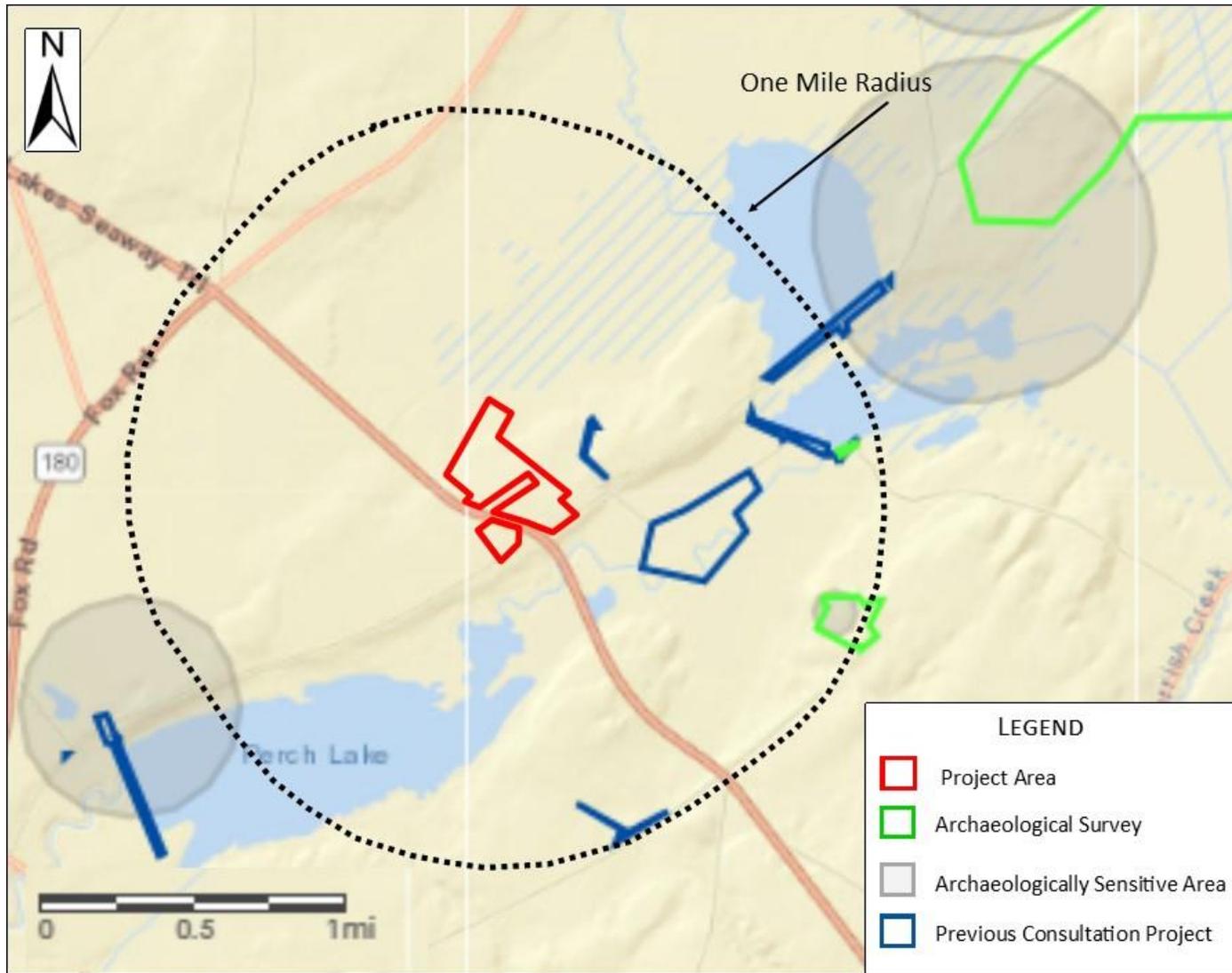


Figure 3: Eastern Project Area Superimposed OPRHP CRIS Webviewer Results for Archaeologically Sensitive Areas and NRHP-Eligible within a One-Mile Radius (*accessed April 2020*).



ARCHAEOLOGY COMMENTS

Phase IA/IB Archaeological Survey Recommendation for 300+ Acre Solar Facilities

Project: Riverside Solar

PR#: 20PR03909

Date: 7/1/2020

The State Historic Preservation Office/Office of Parks, Recreation and Historic Preservation (SHPO/OPRHP) recommends a Phase IA archaeological survey, including recommendations for potential Phase IB archaeological field testing. A Phase IA: Literature Search and Sensitivity Study is the initial assessment of the overall sensitivity of a project area (*Area of Potential Effects or APE*) for the presence of archaeological sites and Native American sites of religious and cultural significance and to guide any subsequent field investigations. The Phase IA should be conducted early in project planning to allow the results to be used in developing project options. Research should be comprehensive, using the SHPO/OPRHP's site files and archeological library, as well as other sources such as universities, local libraries, museums, Indian Nations, historical societies, local informants or other pertinent sources. An initial field inspection of the project area must be conducted to assess the level of testing that may be necessary. This study should document the cultural history of the project area, relevant environmental and geological data, the boundaries and description of the proposed project, any previous ground disturbance, known archaeological sites and provide Phase IB field investigation recommendations.

To protect the archaeological record and to refine the Phase IB archaeological testing scope-of-work, the SHPO/OPRHP strongly encourages developers to reduce grubbing and grading activities, reduce the width of trenches to 3 feet or less, and reduce or eliminate grading for the construction of roadways and staging areas.

Recommendations for the Development of the Phase IB Archeological Scope of Work

Phase IB archaeological testing is not recommended for panel arrays; perimeter fencing and utility poles, if their associated posts are driven or drilled into the ground and no grubbing or grading is involved, and for excavations and grading less than six inches in depth. Phase IB testing is also not recommended for trenches less than three feet wide. However, if the installation of the panel array supports, fencing or utility poles requires grubbing and grading exceeding six inches in depth, then Phase IB archaeological testing is recommended.

Phase IB archaeological testing is recommended for areas of substantial proposed ground disturbance, which includes areas of grading and excavation more than six inches deep, grubbing, tree and stump removal, and trenches more than three feet wide, unless the archaeological sensitivity warrants greater effort.

Our office does not conduct archaeological surveys. A 36 CFR 61 qualified archaeologist should be retained to conduct the Phase IA/IB survey.

If you have any questions concerning archaeology, please contact Tim Lloyd at Timothy.Lloyd@parks.ny.gov.



**Parks, Recreation,
and Historic Preservation**

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

October 08, 2020

Andrew Davis
NYS DPS
Three Empire State Plaza
Albany, NY 12223

Re: PSC
Riverside Solar/ 100 MW/ 1,067 Acres
Brownville, Chaumont, and Lyme, Jefferson County, NY
20PR03909

Dear Andrew Davis:

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

We have reviewed the Phase IA archaeological survey report (NO. 20SR00447). The Archaeology Unit of the OPRHP has recently developed an archaeological sensitivity model and Phase IB testing protocol (see attachment). OPRHP recommends that the attached model and testing protocol be adopted for the Phase IB archaeological survey for this project.

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

Sincerely,

Tim Lloyd, Ph.D., RPA
Scientist - Archaeology
timothy.lloyd@parks.ny.gov

via e-mail only



Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

ARCHAEOLOGY COMMENTS

SOLAR FACILITY

Phase IA/IB Archaeological Survey Recommendations/Sensitivity Model

Project: Riverside Solar

PR#: 20PR03909

Date: 10/8/2020

The State Historic Preservation Office/Office of Parks, Recreation and Historic Preservation (SHPO/OPRHP) recommends a Phase IA archaeological survey, including Phase IB testing recommendations. A Phase IA: Literature Search and Sensitivity Study is the initial assessment of the overall sensitivity of a project area (*Area of Potential Effects or APE*) for the presence of archaeological sites and Native American sites of religious and cultural significance and functions to guide subsequent field investigations.

The State Historic Preservation Office/Office of Parks, Recreation and Historic Preservation (SHPO/OPRHP) recommends that Phase IB archaeological testing is warranted for areas of substantial proposed ground disturbance that fall within areas of high archaeological sensitivity. Substantial proposed ground disturbance includes: (1) grading and excavation more than six inches deep; (2) grubbing, tree and stump removal; and (3) trenches more than three feet wide. Phase IB archaeological testing is not recommended for panel arrays; perimeter fencing and utility poles, if their associated posts are driven or drilled into the ground and no grubbing or grading is involved, and for excavations and grading less than six inches in depth.

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

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

If project design flexibility or shovel ready status is desired, the SHPO recommends 100% sampling of all highly sensitive areas irrespective of the nature and type of construction impacts. With this approach, changes in project design will not require further archaeological consultation except for changes that may impact archaeological sites or that increase the size of the project area.

Our office does not conduct archaeological surveys. A 36 CFR 61 qualified archaeologist should be retained to conduct this work.

Please provide the interested Indian Nations with a copy of the Phase IA report, including the Phase IB archaeological testing scope-of-work and request that the Indian Nations provide cultural resource comments

to the Secretary of the Public Service Commission (*address enclosed*) and copy the SHPO/OPRHP. Indian Nation contact information is enclosed.

If you have any questions concerning archaeology, please contact Tim Lloyd at Timothy.Lloyd@parks.ny.gov.

Hon. Michelle L. Phillips

Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY 12223-1350
Phone: (518) 474-2500
Fax: (518) 474-9842
E-mail: secretary@dps.ny.gov

Indian Nation Contact Information

Onondaga Nation

Anthony Gonyea, Faithkeeper
4040 State Route 11
Onondaga Nation Administration Building
Via: Nedrow, New York 13120
Cell: (315) 952-3109
Email: tony61gonyea@gmail.com
Email: stevethomas808@yahoo.com



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TRCcompanies.com

November 4, 2020

Daniel Bagrow
Historic Preservation Program Analyst
Division for Historic Preservation
New York State Office of Parks, Recreation and Historic Preservation
Peebles Island State Park
P.O. Box 189, Waterford, New York, 12188-0189

RE: Submittal of Historic Architecture Survey Methodology: Proposed Riverside Solar Project, Towns of Lyme and Brownville, Jefferson County, New York (20PR03909)

Dear Mr. Bagrow,

Riverside Solar, LLC, (Riverside Solar), a subsidiary of National Grid Renewables, LLC, (f/k/a Geronimo Energy, LLC), is proposing to construct a solar energy facility (Riverside Solar Project or Project) licensed by the Office of Renewable Energy Siting under Section 94-c of the New York State Executive Law. The Project will have a generating capability of approximately 100 megawatts (MW) of power. Your office, in its review comments received on September 16 and 28, 2020, through the Cultural Resources Information System (CRIS), requested a Historic Architecture Survey be conducted for the Project via the Trekker mobile application, following the July 30, 2020, *New York State Historic Preservation Office Guidelines for Solar Facility Development Cultural Resources Survey Work* [OPRHP Guidelines].

Project Setting

The Riverside Solar Project Area is located in the Towns of Lyme and Brownville, adjacent to the Village of Chaumont. The Project Area consists of agricultural fields and wooded areas.

Project Description

The Project may consist of tracking technology PV panels installed on low-profile racking systems mounted on poles driven directly into the ground. Inverters are spaced throughout the Project. The substation will take the power from the inverters and step it up to match the voltage of the electrical grid. A protective fence will surround the Project. Temporary laydown and staging areas will be used during construction to store and position vehicles and equipment. The final solar array specification, as well as locations of arrays, will be finalized as part of micro-siting efforts. Riverside Solar will interconnect to the power grid via a line tap to the existing Lyme to Lyme Tap 115-kV line.

The Project as currently proposed will include a total of 1,067 acres of land. The acreage that will be directly impacted by Project components is unknown at this time. The final solar array specification, as well as locations of arrays, will be finalized as part of micro-siting efforts.

Survey Methodology

As per the September 16 and 28, 2020, OPRHP Project review requests, and consistent with the OPRHP Guidelines for solar arrays covering 100 acres or more, TRC, on behalf of Riverside Solar, proposes the following survey methodology to complete the requested historic architectural survey and visual effects assessment. TRC completed a GIS analysis identifying all areas within a two-mile radius that will have positive visibility of the solar field based on bare-earth topography only (Figure 1). Vegetation and buildings were not factored into the visibility modeling.

Based on the survey request, TRC will complete a survey of all properties 50 years old or older within the Zone of Visual Impact (ZVI), which is defined as areas within the two-mile radius of the solar field that the bare earth topography visibility modeling shows will have positive visibility of the Project.

TRC will identify and map all previously identified National Register of Historic Places (NRHP) listed and eligible architectural resources and architectural resources with an undetermined eligibility status in CRIS, within the ZVI, as defined above. TRC will complete a reconnaissance-level, historic architectural survey to identify, document, and evaluate for NRHP eligibility, architectural resources 50 years old or older within the ZVI. The survey will include updates to all previously identified resources from the following categories: resources with undetermined NRHP status in CRIS, NRHP-eligible resources, and NRHP-listed resources. TRC will pay close attention to newly identified resources and resources with an undetermined NRHP status that are found in concentrations or clusters that may form a historic district. TRC will photograph and update the NRHP status of previously surveyed resources.

Additionally, TRC's Architectural Historians, who exceed the professional qualification standards set forth by the *Secretary of the Interior* for both Architectural Historians and Historians (36 CFR § 61), will survey new resources that, in their opinion, may meet NRHP eligibility criteria. All resources will be assessed from public rights of way. TRC will not survey resources that meet the NRHP age criterion but do not possess sufficient historic architectural integrity or historical merit to be recommended NRHP-eligible under any criterion. TRC will utilize the Trekker mobile application for completion of the survey.

Reporting

TRC will submit an Historic Resources Survey Report that will include survey results and an assessment of adverse effects on historic properties (NRHP-listed, NRHP-eligible, and resources recommended NRHP-eligible). Trekker survey forms for each surveyed resource in the ZVI will be submitted to OPRHP via CRIS Trekker Manager. TRC will also submit an Annotated Properties List in the format of an Excel spreadsheet to CRIS. The list will include the following fields, in accordance with OPRHP Guidelines: property name (if any); address; municipality; county; USN (if any); current NRHP status; current/proposed NRHP criteria/recommended area(s) of significance; integrity; recommended NRHP status; and a primary image.

TRC will provide a spreadsheet and map that identify, per OPRHP Guidelines, all New York State and/or National Register listed properties and districts, and National Historic Landmarks with positive visibility of the Project within a five-mile radius.

Should you have any questions or wish to discuss this methodology, please do not hesitate to contact me at mhyland@trccompanies.com.

Respectfully submitted,



Matthew G. Hyland, Ph.D.
Senior Architectural Historian

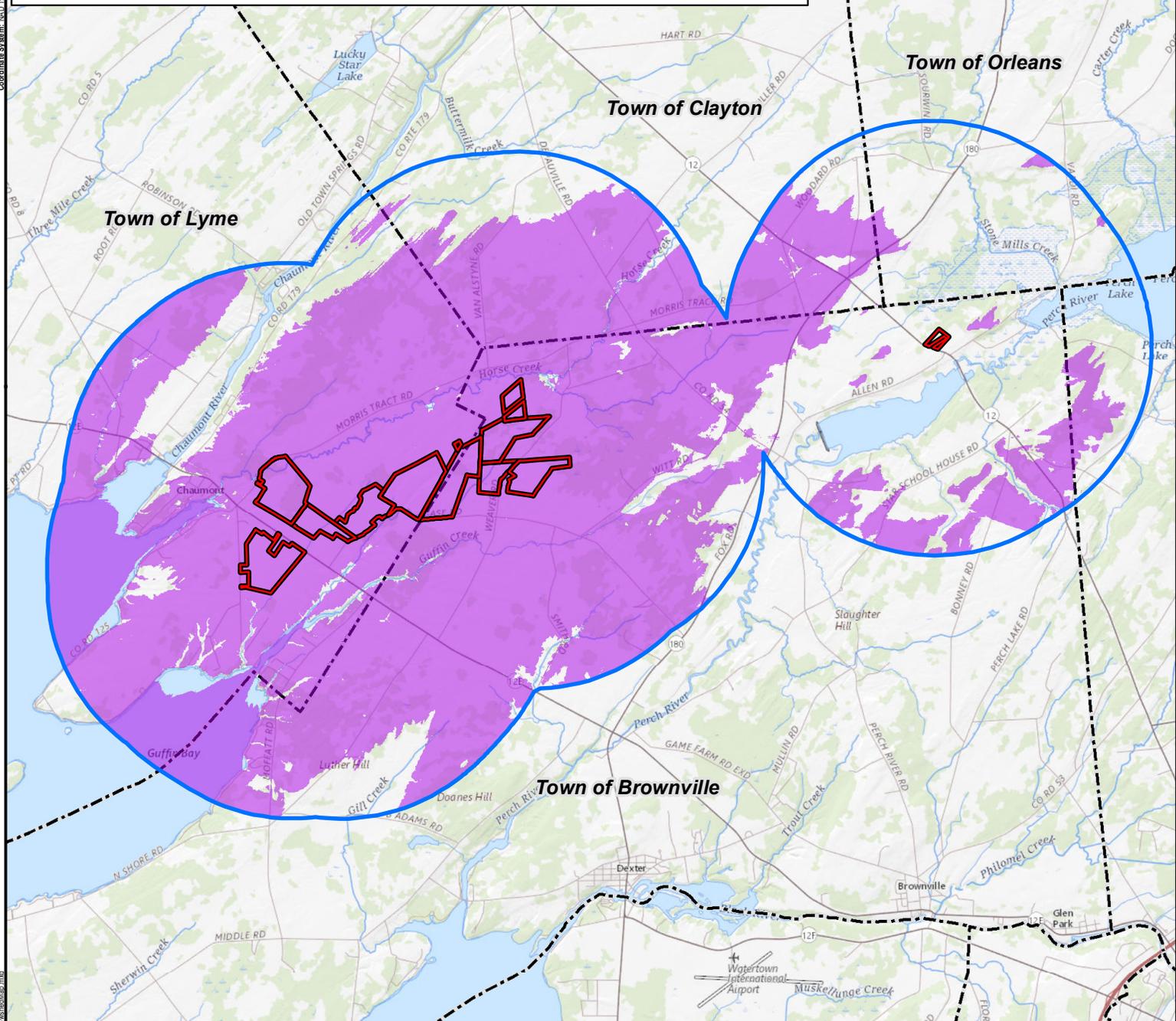
Cc: Rachel Silva, TRC
Tim Sara, TRC
Brett Hastings, National Grid Renewables

File: 373222.0000.0000



Coordinate System: NAD 1983 Spheroid: New York Central FIPS 3102 East (Foot US) Map Resolution: 0

NOTES
 1. THIS FIGURE SHOWS PRELIMINARY SOLAR ARRAY VISIBILITY ONLY.
 2. TOPOGRAPHIC INFORMATION FROM FEMA/NYSGPO LIDAR COLLECTION (2010, 2014).
 3. SOLAR ARRAYS ASSUMED TO BE 14' TALL, WITH AN OBSERVER HEIGHT OF 6' FOR VIEWSHED ANALYSIS.
 4. VISIBILITY DOES NOT MEAN THE ENTIRETY OF SOLAR ARRAY WILL BE SEEN. THE MODEL DOES NOT ACCOUNT FOR THE LIMITATIONS OF HUMAN VISION AT A GREATER DISTANCE OR ATMOSPHERIC CONDITIONS THAT MAY CAUSE REDUCED VISIBILITY. THE VIEWSHED MODEL DOES NOT TAKE INTO ACCOUNT SCREENING BY OBJECTS SUCH AS VEGETATION OR BUILDINGS.
 5. INFORMATION PRESENTED HERE IS THE RESULTS OF A DESKTOP ANALYSIS AND HAS NOT BEEN GROUND-TRUTHED.



LEGEND

- PROJECT SITE
- TWO-MILE BUFFER OF PROJECT SITE
- TOWN BOUNDARY
- POTENTIAL SOLAR PANEL VISIBILITY BASED ON TOPOGRAPHY ONLY

1:96,000
 1" = 8,000'

0 0.5 1 Miles

1. BASE MAP IMAGERY FROM ESRI
 2. USGS TOPO MAP SERVICE

PROJECT: RIVERSIDE SOLAR LLC TOWNS OF LYME & BROWNVILLE JEFFERSON COUNTY, NY	
TITLE: POTENTIAL VISIBILITY	
DRAWN BY: D. BARLEY	PROJECT NO.: 373222
CHECKED BY: A. KAILAS	
APPROVED BY: S. KRANES	
DATE: OCTOBER 2020	
215 GREENFIELD PKWY, STE 102 LIVERPOOL, NY 13088	
MAP PRODUCED BY: TRC	

FIGURE 1



Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

June 2, 2021

Andrew Davis
NYS DPS
Three Empire State Plaza
Albany, NY 12223

Re: PSC
Riverside Solar/ 100 MW/ 1,067 Acres
Brownville, Chaumont, and Lyme, Jefferson County, NY
20PR03909

Dear Andrew Davis:

Thank you for requesting the comments of the Division for Historic Preservation of the Office of Parks, Recreation, and Historic Preservation (OPRHP). The Archaeology Unit has reviewed the Phase IB Archaeological Survey report prepared by TRC (Gollup et al. April 2021; 20PR03909) 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 Archaeological Historic/Cultural resources.

Before we can continue with our review, OPRHP requests the following clarifications and report revisions:

1. Management Summary:
 - a. Identify the number and name of archaeological sites and the number of isolated Native American artifact finds only.
 - b. Please indicate the total acreage covered by the pedestrian survey.
2. Summary of Phase IA Sensitivity Assessment:
 - a. It appears that the project's Area of Potential Effects (APE) has changed since the Phase IA was conducted. There is a contradiction in the facility acreage considered to have high archaeological sensitivity between the Phase IA & IB (i.e., Table 2-2 283.6 acres versus 399.9 indicated in Field and Laboratory Methods section; Figures 2-1 and 3-1). A discussion of the changes to the project's APE and sensitivity assessment, and how the revised sensitivity assessment was arrived at is warranted.
3. Cultural Resources:
 - a. Historic isolated finds (IFs) and "non-site" historic scatters are not considered cultural resources by the OPRHP. Historic IFs and historic field scatters should not be referred to or treated as cultural resources in the report, tables, on maps, or in the recommendations. Please limit discussions of historic scatters as general observations within "Section 4. Field Results."

...2

- b. Please provide a map indicating the approximate location and if possible, the extent of the landowner reported unmarked family cemetery within Survey Area 5 (Figure 4-17) and provide photographs of the potential cemetery location.
 - c. TRC-RS-8: Three concrete “features” are reported as potentially representing the remains of a small maple sugar operation. Please provide additional comparative and background information in support of this hypothesis and site designation, including documentation of their presence, and the regularity of maple sugaring in this area.
 - d. TRC-RS-9: OPRHP has determined that TRC-RS-9 is not an archaeological site as it is largely comprised of extant structures, very limited cultural material, and a 1940s concrete foundation feature. Archaeological site avoidance is therefore not warranted. Please remove reference to TRC-RS-9 as a site or cultural resource from the report, tables, and figures.
4. Methodology:
- a. Indicate the acreage covered by systematic survey surface in the discussion of each Survey Area where applicable along with the acreage covered by shovel tests.
 - b. Indicate if reduced-interval testing was conducted around the Native American isolated surface find in Survey Area 2, or around Map Documented Structures (MDSs) (i.e., 1900 MDS, Figure 4-32).
5. Maps:
- a. Please remove those portions of the APE from maps that will no longer be part of the solar Facility (as per Figure 4-1) from overview-type maps (i.e., Figure 1-1 and 3-1).
 - b. Site-specific maps need to have all negative, and positive STPs indicated on them.
 - c. Please overlay site maps on aerial photos, historic maps, or USGS maps instead of white backgrounds and at a wider scope to provide spatial context, and outline the locations of MDSs, historic standing structures, rivers, roads, etc.

We are refraining from determining if TRC-NS-8 is a site until we have the above noted additional information. If TRC-RS-8 is determined by OPRHP to be an archaeological site, a Site Avoidance plan with the site boundary and buffer zone like that provided for TRC-RS-9 (Figure 3) will be requested.

If you have any questions, I can be reached via e-mail at Josalyn.Ferguson@parks.ny.gov.

Sincerely,



Josalyn Ferguson, Ph.D.
Scientist Archaeology

via email only

c.c. J. Gollup, M. Hyland, M. Mitchell, R. Silva & T. Sara, TRC
c.c. Noreena Chaudari DPS
c.c. Houtan Moaveni, ORES

c.c. Jesse Bergevin, Oneida Nation



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June 21, 2021

Josalyn Ferguson, Ph.D.
Scientist/Archaeology
Division for Historic Preservation
Office of Parks Recreation and Historic Preservation
P.O. Box 189
Waterford, NY 12188-0189

***RE: Revised Phase IB Report Submittal, ORES Riverside Solar Project/100MW/1,067 Acres
Towns of Brownville, Chaumont, and Lyme, Jefferson County, NY
20PR03909***

Dear Dr. Ferguson,

Thank you for your review letter of June 2, 2021 offering your agency's comments on the Phase IB Archaeological Survey Report prepared by TRC (Gollup et al. April 2021; 20PR03909) 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, and your request for a revised report addressing your agency's comments. The report was prepared in support of the Office of Renewable Energy Siting's (ORES) 94-c permitting process for the construction and operation of major electrical facilities on behalf of Riverside Solar, LLC.

To facilitate review, the attached table provides TRC's response to each comment indicating how they were addressed in the revised report. As requested, comment addressed are: 1) Management Summary (1a and b); 2) Summary of Phase IA Sensitivity Assessment (2a); 3) Cultural Resources (3a - d); 4) Methodology (4a and b), and 5) Maps (5a - c).

Please do not hesitate to contact me at (301) 276-8040, or tsara@trccompanies.com should you have any questions regarding this submittal. We look forward to continued consultation with your agency as we move forward with this project.

Sincerely yours,

Timothy R. Sara, RPA
Program Manager, Archaeology

c.c. S. Kranes, TRC
N. Chaudari DPS
H. Moaveni, ORES

via CRIS upload only

TRC File: 373222.2000.0000

Riverside Solar Project - Revised Phase IB Report - Review Comment/Response Table

OPRHP Comment		Response
1a Management Summary	Identify the number and name of archaeological sites and the number of isolated Native American artifact finds only.	As per OPRHP instructions below (Historic isolated finds (IFs) and “non-site” diffuse historic scatters are not considered cultural resources by the OPRHP”), archaeological resources have been limited to sites that either have features or can be associated to an MDS.
1b Management Summary	Please indicate the total acreage covered by the pedestrian survey.	Added number of acres of systematic surface survey to the management summary.
2a Summary of Phase IA Sensitivity Assessment	It appears that the project’s Area of Potential Effects (APE) has changed since the Phase IA was conducted. There is a contradiction in the facility acreage considered to have high archaeological sensitivity between the Phase IA & IB (i.e., Table 2-2 283.6 acres versus 399.9 indicated in Field and Laboratory Methods section; Figures 2-1 and 3-1). A discussion of the changes to the project’s APE and sensitivity assessment and how the sensitivity assessment was arrived at is warranted.	Table 2-2 and Figure 2-1 depict the Phase IA high sensitivity acreage, 283.6 total acres. The OPRHP <i>New Guidelines</i> define areas of high archaeological sensitivity as: (1) within 100-meters (328 feet) of permanent water (rivers, streams, wetlands, ponds and lakes and hydric soils) and on slopes equal to or less than 12 percent; (2) within known archaeological sites; and (3) locations of standing or demolished historic structures. Prior to Phase IB survey, the archaeological sensitivity of the Project Area was revised utilizing the updated OPRHP sensitivity guidelines. (pg 8 – Field and Laboratory Methods). Figures 3-1 reflects the <i>New Guidelines</i> and show the recalculated high sensitivity acreage, 399.9 total acres.
3a Cultural Resources	Historic isolated finds (IFs) and “non-site” historic scatters are not considered cultural resources by the OPRHP. Historic IFs and historic field scatters should not be referred to or treated as cultural resources in the report, tables, on maps, lease limit discussions of historic scatters as general observations within Section 4. Field Results.	All historic isolated finds and historic scatters have been cut down to mention on maps (as Positive STP (Historic) and a brief mention in the Results Chapter. All previously assigned Field numbers have been removed.
3b Cultural Resources	Please provide a map indicating the approximate location and if possible, the unmarked family cemetery within Survey Area 5 (Figure 4-17) and provide photographs of the potential cemetery location.	The landowner was vague about the possibility and location of a cemetery; no headstones were observed in the field and thus no map location or photos can be provided.
3c Cultural Resources	TRC-RS-8: Three concrete “features” are reported as potentially representing the remains of a small maple sugar operation. Please provide additional comparative	Additional comparative and background information including documentation of their presence, and regularity of maple sugaring in this area has been added to Section 5: Newly Recorded Resources (pg. 50-51).



OPRHP Comment		Response
	and background information in support of this hypothesis and site designation, including documentation of their presence, and the regularity of maple sugaring in this area.	
3d Cultural Resources	TRC-RS-9: OPRHP has determined that TRC-RS-9 is not an archaeological site as it is largely comprised of extant structures, very limited cultural material, and a 1940s concrete foundation feature. Archaeological site avoidance is therefore not warranted. Please remove reference to TRC-RS-9 as a site or cultural resource from the report, tables, and figures.	References to TRC-RS-9 as a cultural resource is removed from the report, tables, and figures.
4a Methodology	Indicate the acreage covered by systematic survey surface in the discussion of Survey Area where applicable along with the acreage covered by shovel tests.	Systematic surface survey acreage totals were added to the Survey Area discussion sections.
4b Methodology	Indicate if reduced-interval testing was conducted around the Native American isolated surface find in Survey Area 2, or around Map Documented Structures (MDSs) (i.e., 1900 MDS, Figure 4-32).	Reduced interval testing was conducted around the Native American isolated surface find and this was indicated in Survey Area 2. Reduced interval testing was not conducted around MDSs.
3c Methodology	Pg. 10 – 100% sample of high sensitivity areas was surveyed, not 100% of Area of Potential Effects (APE) was surveyed. Please correct.	Corrected and removed APE.
5a Maps	Please remove those portions of the APE from maps that will no longer be part of the Solar Facility (as per Figure 4-1) from overview-type maps (i.e., Figure 1-1 and 3-1).	Removed portions of the APE from maps that will no longer be a part of the Solar Facility from overview-type maps.
5b Maps	Site -specific maps need to have all negative, and positive STPs indicated on them.	All negative and positive STPs are on site-specific maps and indicated in the legend.
5c Maps	Please overlay site maps on aerial photos, historic maps, or USGS maps instead of white backgrounds and at a wider scope to provide spatial context, and outline the locations of MDSs, historic standing structures, rivers, roads, etc.	Site maps were overlaid onto contextual maps instead of a white background and zoomed out to a wider scope to provide spatial context. Figures with site measurements in plan map form were renamed and a small inset map with contextual information was added in.

From: [Steinwachs, Erin](#)
To: tony61gonyea@gmail.com; stevethomas808@yahoo.com
Cc: [Joshua Baird](#); [Sara, Tim](#); [Kranes, Samantha](#); jack.donelan@aes.com; Brett.hastings@aes.com; Michael.farrell@aes.com
Subject: Request for Consultation: Proposed Riverside Solar Project, Towns of Lyme and Brownville, Jefferson County, New York
Date: Monday, June 28, 2021 3:55:00 PM
Attachments: [image001.png](#)
[Riverside Solar Phase IA Archaeo Report with Cover 9-18-20.pdf](#)
[Riverside Solar Phase IB Archaeo Report with Cover 6-21-21.pdf](#)

Dear Mr. Gonyea,

Riverside Solar, LLC (Riverside Solar) proposes to construct the Riverside Solar Project under Section 94-c of the New York Executive Law in the Towns of Lyme and Brownville, Jefferson County, New York (Figure 1 - Project Area). The Project will have a generating capacity of approximately 100 megawatts (MW) and occupy approximately 792.7 acres as shown on Figure 1. TRC Companies (TRC) has been retained by Riverside Solar to provide environmental review and licensing services in support of the Project. The purpose of this letter is to initiate consultation on behalf of Riverside Solar with the Onondaga Nation to assist in determining potential impacts to cultural resources that could result from the Project. As requested by the OPRHP, TRC has conducted a Phase I archaeological survey in support of the application and is pleased to submit the Phase IA and IB reports to the Nation. Riverside Solar would also welcome any information you may have on significant archaeological, religious, or cultural sites that may be of special importance to the Nation within the Project area and to continue consultation through the application process. Please do not hesitate to contact me at (240) 556-9181, esteinwachs@trccompanies.com or Tim Sara (301) 276-8040, tsara@trccompanies.com, should you require any additional information.

Thank you,

Erin Steinwachs, MA, RPA
Archaeologist/Lab Director



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To: jbergevin@oneida-nation.org
Cc: [Joshua Baird](mailto:joshua_baird@trccompanies.com); [Sara, Tim](mailto:sara_tim@trccompanies.com); [Kranes, Samantha](mailto:kranes_samantha@trccompanies.com); [jack.donelan@aes.com](mailto:jack_donelan@aes.com); [Brett.hastings@aes.com](mailto:brett_hastings@aes.com); [Michael.farrell@aes.com](mailto:michael_farrell@aes.com)
Subject: Request for Consultation: Proposed Riverside Solar Project, Towns of Lyme and Brownville, Jefferson County, New York
Date: Monday, June 28, 2021 3:57:00 PM
Attachments: [image001.png](#)
[Riverside Solar Phase IA Archaeo Report with Cover 9-18-20.pdf](#)
[Riverside Solar Phase IB Archaeo Report with Cover 6-21-21.pdf](#)

Dear Mr. Bergevin,

Riverside Solar, LLC (Riverside Solar) proposes to construct the Riverside Solar Project under Section 94-c of the New York Executive Law in the Towns of Lyme and Brownville, Jefferson County, New York (Figure 1 - Project Area). The Project will have a generating capacity of approximately 100 megawatts (MW) and occupy approximately 792.7 acres as shown on Figure 1. TRC Companies (TRC) has been retained by Riverside Solar to provide environmental review and licensing services in support of the Project. The purpose of this letter is to initiate consultation on behalf of Riverside Solar with the Oneida Nation to assist in determining potential impacts to cultural resources that could result from the Project. As requested by the OPRHP, TRC has conducted a Phase I archaeological survey in support of the application and is pleased to submit the Phase IA and IB reports to the Nation. Riverside Solar would also welcome any information you may have on significant archaeological, religious, or cultural sites that may be of special importance to the Nation within the Project area and to continue consultation through the application process. Please do not hesitate to contact me at (240) 556-9181, esteinwachs@trccompanies.com or Tim Sara (301) 276-8040, tsara@trccompanies.com, should you require any additional information.

Thank you,

Erin Steinwachs, MA, RPA
Archaeologist/Lab Director



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