

Appendix 20-2:  
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: Proposed Garnet Energy Center (Solar), Town of Conquest, Cayuga County, New York**

Dear Mr. Mackay,

Garnet Energy Center, LLC (Applicant) proposes to construct the Garnet Energy Center (Project) under Article 10 of the Public Service Law (PSL) or under Section 94-c of the New York Executive Law. If the Project requires a USACE NWP or IP, the Project will also be conducted in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Project will have a generating capability of 200 megawatts (MW) of power with a 20 MW/four-hour energy storage system located on land leased from owners of private property in the Town of Conquest, Cayuga County (Project Area) (**Figure 1**).

Project Components will include commercial-scale solar arrays, access roads, buried (and possibly overhead) electric collection lines, energy storage, fencing, inverters, a Project collection substation, and electrical interconnection facilities located within an approximate 1,825-acre site (Project Area). Garnet Energy Center anticipates the interconnection facilities will include a 345 kilovolt (kV) switchyard, which will be transferred to New York Power Authority (NYPA) to own, operate, and maintain. The proposed collection substation and interconnection facilities will be located on land leased within the Project Area, adjacent to NYPA's existing Clay to Pannell 345 kV transmission line. The final solar array specification, as well as locations of arrays, will be finalized as part of ongoing engineering efforts.

TRC Companies, Inc. (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**

TRC plans to conduct a Phase IA archaeological study, the objective of which 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 Impact Area or Area of Potential Effect (APE). For archaeological resources, the Impact Area or APE is defined as a location where significant ground disturbance may occur, including the construction of



access roads, work spaces, buried electric collection lines, security fences, and electrical interconnection facilities. It is anticipated that the installation of posts for solar panels will be conducted by pile-driver or similar device and not constitute a significant ground disturbance.

Based on review of the Project Area on the Cultural Resources Information System (CRIS), there is one previously recorded archaeological site within the Project Area and one additional archaeological site within a one-mile radius (**Table 1**). Site 01104.000020 is a prehistoric-period isolated find identified in the far western portion of the Project Area. Site 01104.000019 is located approximately 0.83 miles west of the Project Area and is an historic artifact scatter. The National Register of Historic Places (NRHP) status of both sites is undetermined.

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

Unique Site Number (USN)	Site Type	NRHP-Eligibility Status	Distance from Project Area
01104.000019	Historic, artifact scatter	Undetermined	0.83 mi west
01104.000020	Prehistoric, isolated find	Undetermined	Within Project Area

Portions of the Project Area are identified as archaeologically sensitive in CRIS. No archaeological surveys have been conducted within a one-mile radius of the Project Area. Seven consultation projects have been conducted within one mile of the Project Area, including three projects within the Project Area boundary (**Figure 2**). Two CRIS-mapped New York State Museum (NYSM) archaeological areas (NYSM 1534 and 7402) are located within a one-mile radius of the Project Area. No NYSM archaeological sites are noted within a one-mile radius. Two cemeteries are identified within a one-mile radius of the Project Area: Conquest Village Cemetery, located 0.33 miles southwest of the Project Area, and Emerson Cemetery, located 0.99 mi south of the Project Area.

### **Historic Architecture**

Per the procedures set forth in 16 NYCRR § 1000.2 (ar), the Study Area to be used for above-ground historic architectural resource analysis is defined as “an area generally related to the nature of the technology and the setting of the proposed site.” TRC’s previous architectural history surveys for large solar energy projects approved by OPRHP used a two-mile Study Area. Therefore, TRC is recommending a Study Area of two miles from the Project Area boundaries for this Project due to the extremely low profile of proposed structures associated with the solar arrays and the setting of the proposed Project Area. This two-mile Study Area would include portions of the Towns of Conquest, Victory, Ira, and Cato, and the Village of Cato. This two-mile Study Area would also contain the Impact Area or APE for above-ground resources.

The Impact Area or APE for above-ground resources is defined as the geographic area or areas within which the undertaking may cause changes in the character or use of historic properties. The Impact Area or 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. The Impact Area or APE includes the Project Area and those areas farther removed in distance where Project Components may be visible and where there is a potential for a significant visual effect. The Impact Area or APE may be refined further to include areas that fall within the potential Project Area viewshed (e.g., those portions of the Study Area within which visibility modelling suggests the Project is



potentially visible). The final Study Area and Impact Area or APE will be determined in consultation with your office.

Based on a review of CRIS, there are no previously recorded, above-ground architectural resources within the Project Area. One previously identified resource (USN 01123.000006) is located adjacent to the Project Area, but outside the Project's boundaries, and has been previously determined not eligible for the NRHP. Results of a CRIS search of a two-mile radius of the Project Area identified nineteen previously surveyed architectural resources, of which one previously was determined NRHP eligible, nine previously were determined not eligible for NRHP listing, and nine have an undetermined eligibility status (**Table 2**).

**Table 2: Previously Recorded Architectural Resources within Two Miles of Project Area**

USN	Resource Name	NRHP Eligibility Status
01104.000036	Greek Revival Schoolhouse - 1764 Lemon School Road	Eligible
01104.000034	784 Spring Lake Road	Not Eligible
01104.000041	10096 Dietzel Road, Weedsport, NY	Not Eligible
01149.000002	2773 Brick Church Road	Not Eligible
01123.000012	1661 Conquest Victory Townline Road	Not Eligible
1104.000043	754 Springlake Road, Port Byron	Not Eligible
1104.000045	10623 Peachblow Road, Cato	Not Eligible
1104.000046	821 Spring Lake Road	Not Eligible
1104.000042	149 E. Lake Road, Port Byron	Not Eligible
1103.000089	10129 Baker Road, Weedsport	Not Eligible
1104.000037	Conquest Methodist Church - NY 38	Undetermined
1104.000039	Emerson Church - O'Neil Road	Undetermined
1105.00005	McCluch Residence – Silver Street	Undetermined
1103.000073	Farmstead - NY 34	Undetermined
1104.00004	Countryside United Methodist Church - Duck Lake Road	Undetermined
1123.000006	Five-bay, Two-Story Dwelling – Lake Road	Undetermined
1104.000038	Emerson School House - O'Neil Road	Undetermined
1105.000051	Milk Station – Silver Street	Undetermined
1104.000023	Cobblestone Schoolhouse - RTE 38	Undetermined

The Project Area is within a rural setting and contains wooded areas, open fields and agricultural land, wetlands and streams, and limited-use roads and private driveways. Review of contemporary aerial photography reveals approximately five potential architectural resources within the Project Area, including two farms, unassociated outbuildings, and one prefabricated mobile home. One potential resource, a circa 1820 residence on New York Route 38 is outside of, but surrounded on all sides by, the Project Area. These resources have not been evaluated for NRHP eligibility. As currently planned, the Project is expected to have no physical impacts to above-ground resources in the Project Area.



## **Recommendations**

### *Archaeology*

The majority of the Project Area is characterized as open agricultural fields and wooded areas. Should your office determine that a Phase IB survey is warranted, TRC assumes the survey would be limited to areas of significant ground disturbance within areas of high or moderate archaeological sensitivity as defined by your office for solar energy projects of this type (e.g., construction locations for access roads, work spaces, buried electric collection lines, security fences, and electrical interconnection facilities). TRC 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's *Phase I Archaeological Report Format Requirements* (2005).

### *Historic Architecture*

There are approximately five architectural resources within the Project Area, all of indeterminate construction dates and none of which have been previously surveyed. There are another nineteen previously recorded architectural resources within a two-mile radius of the Project Area, including nine whose NRHP eligibility has not been evaluated. Should your office determine that a Historic Architectural Resources Survey is warranted, TRC assumes the survey would be limited to those portions of the Study Area within which visibility modelling suggests the Project may be visible. TRC will conduct the Historic Architectural Resources Survey in accordance with a methodology that is developed in consultation with, and approved by, OPRHP.

TRC respectfully requests your review of this information to determine the need for further study of potential Project effects as warranted. We look forward to receiving your comments in support of the permitting 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](mailto:tsara@trccompanies.com).

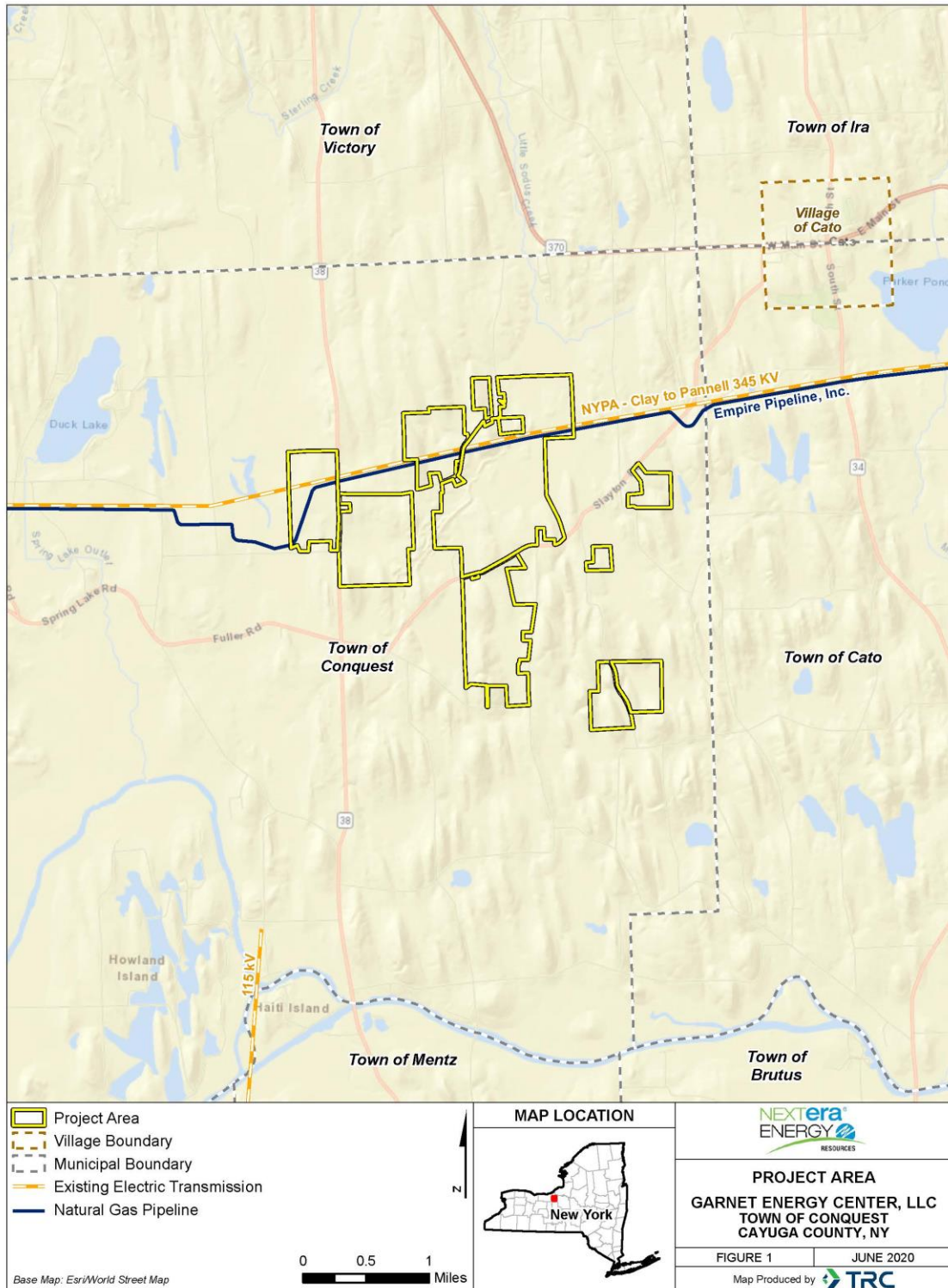
Sincerely yours,

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

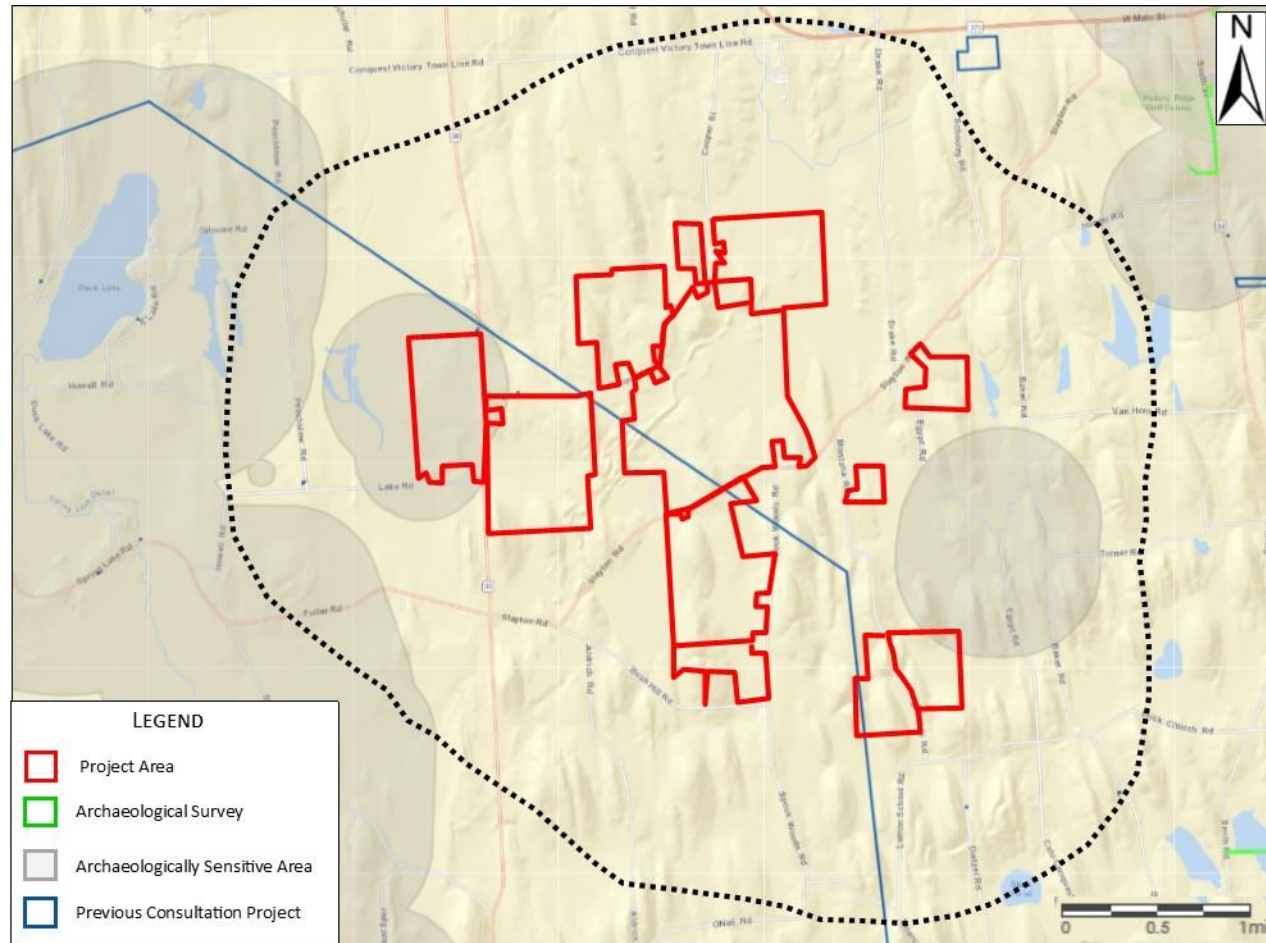
Timothy R. Sara, RPA  
Program Manager, Cultural Resources

cc: Hayley Effler, TRC

file 380342.0000.0000



**Figure 1:** General Project location in Cayuga County, New York.



**Figure 2:** Project Area superimposed OPRHP CRIS Webviewer results for Archaeologically Sensitive Areas within a one-mile radius (*accessed June 2020*).



## Parks, Recreation and Historic Preservation

ANDREW M. CUOMO  
Governor

ERIK KULLESEID  
Commissioner

### ARCHAEOLOGY COMMENTS

#### Phase IA/IB Archaeological Survey Recommendation for Solar Facilities

Project: Garnet Energy Center Solar

PR#: 20PR03795

Date: 6/29/2020

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 archaeological 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.

If Native American cultural resources may be affected by a solar facility, the pertinent Indian Nations should be provided the Phase IA Report, including Phase IB archaeological testing scope-of-work, for review and comment. The SHPO/OPRHP can provide Indian Nations contact information upon request. Please request this information by contacting the archaeology reviewer responsible for the county in which your project is located. Contact information can be found at <https://parks.ny.gov/shpo/contact/>.

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](mailto:Timothy.Lloyd@parks.ny.gov)



## **Parks, Recreation, and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

September 08, 2020

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

Re: PSC  
Garnet Energy Center Solar / 200 MW / 1800 Acres  
Town of Conquest, Cayuga County, NY  
20PR03795

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 report of the Phase IA archaeological investigation (Report No. 20SR00433). OPRHP recommends report revisions to provide clarification regarding the criteria used for the division of the Area of Potential Effects into areas of high, medium, and low archaeological sensitivity, and the proposed Phase IB field methods within the three sensitivity zones. OPRHP also recommends revising the statement in the report regarding OPRHP's definition of substantial proposed ground disturbance.

A Precontact Period archaeological sensitivity model is presented on Pages 28 to 29. Although it is not directly stated in the report, the Precontact Period sensitivity model appears to focus on three factors: distance to water, slope, and soil permeability. OPRHP agrees that these are three important characteristics for evaluating relative archaeological sensitivity. The report states, "Areas within Phase IA Archaeological Survey - Garnet Energy Center Town of Conquest, Cayuga County, New York 29 100 meters of several unnamed waterways in this area are characterized as having high archaeological sensitivity" (Page 28). This sentence appears to state that areas within 100 meters of water are defined as possessing high archaeological sensitivity. The report does not state what distance to water separates medium from low archaeological sensitivity. Likewise, slope is repeatedly referenced as an important factor for sensitivity assessment, but no slope cutoff numbers are provided for each of the three sensitivity categories. Soil permeability is also discussed in the report, but no specific criteria, such as standard soil permeability terms (e.g., well drained, moderately drained, or poorly drained) is presented as definitions of the three sensitivity categories. OPRHP recommends that Pages 28 to 29 be revised to clearly describe the criteria that define each of the sensitivity categories.

Recommendations for Phase IB archaeological fieldwork are present on Page 38. The report states that Phase IB testing will be conducted in locations where significant construction impacts overlap with areas of high and medium archaeological sensitivity. The report also states,

In accordance with New York State guidelines (NYAC 1994), the Phase IB archaeological field survey would consist of systematic excavation of shovel tests at 15-m (50-ft) intervals in all proposed construction impact areas that contain less than 15 percent slope, are not classified as wetlands, are undisturbed from prior development, and have not been previously surveyed. Remaining areas would be examined via pedestrian survey and judgmentally placed shovel tests (Page 38).

The last sentence is confusing. What is meant by “remaining areas?” Is it all areas not addressed by the previous sentence? There are several other unanswered questions. Will the testing methods vary between areas of high and medium sensitivity? What about locations with high Historic Period archaeological sensitivity (i.e., map documented structures)? Will those locations be subjected to testing at 15-meter intervals, or will tighter interval testing be conducted? OPRHP recommends that this section be revised to clearly describe the field methods that will be employed in each of the sensitivity categories.

OPRHP recommends that the Phase IA report be modified to clearly state how areas of high, medium, and low archaeological sensitivity are defined, and what Phase IB methods will be employed to investigate these areas.

Finally, on Page 38 the report states,

As defined by the OPRHP for similar solar energy projects in this region of New York, it is anticipated that significant construction impact areas would consist of proposed access roads, collection substations, Point-of-Interconnect (POI) Switch Yards, retention ponds/basins, drainage ditches/tiles over a foot wide, staging areas/temporary laydown yards, parking lots, structures, utility trenches/electrical collections systems over a foot wide, and areas of grubbing and grading.

This is not OPRHP’s definition of proposed ground disturbances for solar projects that potentially require subsurface Phase IB archaeological testing. OPRHP’s definition is stated in the archaeological survey guidance that was provided in response to the initial project submission.

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

October 08, 2020

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

Re: PSC  
Garnet Energy Center Solar / 200 MW / 1,800 Acres  
Town of Conquest, Cayuga County, NY  
20PR03795

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 revised Phase IA archaeological survey report (NO. 20SR00433). 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,

A handwritten signature in blue ink, appearing to read "Tim Lloyd".

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: Garnet Energy Center Solar**

**PR#: 20PR03795**

**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

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#### Division for Historic Preservation

P.O Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • <https://parks.ny.gov>

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](mailto: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](mailto:secretary@dps.ny.gov)

Indian Nation Contact Information

**Cayuga Nation**

Clint Halftown, Nation Representative  
P.O. Box 803  
Seneca Falls, NY 13148  
Phone: (716) 998-1054

Close

Please review the specific information request(s) below and click the Process button to respond to each request.

Close

Refresh G

## Information Requests

Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
Information Requested	James Finelli	Survey and Evaluation	Request a New Attachment, Photo, or Survey for this Consultation Project		Attachment	I'm updating my request to be in line with category 4 of the new guidance: 4. Solar arrays covering 100 acres or more. a. Complete a GIS analysis of areas that will have positive visibility of the solar field based upon topography only (do not factor in vegetation). b. A survey** of all properties 50 years old or older within 2-miles of the solar array ZVI should be completed by a 36 CFR 61 qualified consultant. c. Identification of any New York State and/or National Register listed property or district or National Historic Landmark within 5-miles of project ZVI. Full guidance attached.

04/27/2020

02/13/2020

January 22, 2021

James Finelli  
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 Garnet Energy Center Project, Town of Conquest, Cayuga County, New York (20PRO03795)**

Dear Mr. Finelli,

Garnet Energy Center, LLC, proposes to construct the Garnet Energy Center (Project). The Project will have a generating capability of 200 megawatts (MW) of power with a 20 MW/four-hour energy storage system located on land leased from owners of private property in the Town of Conquest, Cayuga County. Your office, in its review comments received on October 14, 2020, through the Cultural Resources Information System (CRIS), requested a Historic Architecture Survey be conducted for the Project via the Trekker mobile application.

- **Project Setting**

The Project Area is within a rural setting and contains wooded areas, open fields and agricultural land, wetlands and streams, and limited-use roads and private driveways. The Project is located approximately four (4) miles northwest of Weedsport. The terrain in the Project Area is mostly flat, with gently rolling hills and areas of agricultural land.

- **Project Description**

Project components will include commercial-scale solar arrays, access roads, buried (and possibly overhead) electric collection lines, energy storage, fencing, inverters, a Project collection substation, and electrical interconnection facilities located within an approximate 2,288-acre site. It is anticipated that the interconnection facilities will include a 345 kilovolt (kV) switchyard that will be transferred to New York Power Authority (NYPA) to own, operate, and maintain. The proposed collection substation and interconnection facilities will be located on land leased within the Project Area, adjacent to NYPA's existing Clay-to-Pannell 345 kV transmission line.

- **Survey Methodology and Definition of APE**

As per the October 14, 2020, OPRHP Project review request, TRC proposes the following survey methodology to complete the requested historic architectural survey and visual effects assessment. Based on the survey request, TRC will complete a survey of all properties 50 years old or older within the Zone of Visual Impacts (ZVI), which is defined as areas within the two-mile radius of the solar field that the bare earth topography visibility modelling shows will have positive visibility of the Project. Vegetation and buildings will not be factored into the visibility modelling.

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 inventory resources meeting the NRHP age criterion but lacking 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 provide a spreadsheet and map that identify, per OPRHP's request, all New York State and/or National Register listed properties and districts, and National Historic Landmarks with positive visibility of the Project within a 5-mile radius.

Should you have any questions or wish to discuss this work plan, please do not hesitate to contact me at 412.713.7102 or [mhyland@trccompanies.com](mailto:mhyland@trccompanies.com).

Respectfully submitted,

A handwritten signature in black ink that reads "Matthew G. Hyland". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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

Cc: Hayley Effler, TRC  
Tim Sara, TRC  
Bill Boer, Garnet Energy Center, LLC

File: 380342.2020.0000

**From:** [New York State Parks CRIS Application](#)  
**To:** [jgollup@trccompanies.com](mailto:jgollup@trccompanies.com); [Mitchell, Michael](#); [Sara, Tim](#); [Hyland, Matthew](#); [Effler, Hayley](#); [Boer, William](#); [Snyder, Natasha](#); [noreena.chaudari@dps.ny.gov](mailto:noreena.chaudari@dps.ny.gov); [Andrew.davis@dps.ny.gov](mailto:Andrew.davis@dps.ny.gov); [Houtan.Moaveni@ores.ny.gov](mailto:Houtan.Moaveni@ores.ny.gov); [Steinwachs, Erin](#)  
**Subject:** [EXTERNAL] SHPO Requested Submission Received for Requested Archaeological Survey Project: 20PR03795  
**Date:** Thursday, June 17, 2021 2:25:07 PM

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This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

This message is a notification from the New York State Historic Preservation Office (SHPO) through its Cultural Resource Information System (CRIS). Requested submission TIRWWKCX511C has been received for project 20PR03795 (Garnet Energy Center Solar / 200 MW / 1,800 Acres).

No action on your part is required at this time. You will receive an email notification when the submission is accepted to the project or if more information is necessary to process the submission.

This submission was completed for the following SHPO request in response to project submission 20PR03795.003 (response token XJLITS3STJ4J): *Please submit the results of the Phase IB archaeological survey*

If you have any questions about CRIS, please contact CRIS Help at [CRISHelp@parks.ny.gov](mailto:CRISHelp@parks.ny.gov). For any other questions, please call 518-237-8643.

Sincerely,

**New York State Historic Preservation Office**

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189  
518-237-8643 | <https://parks.ny.gov/shpo>  
CRIS: <https://cris.parks.ny.gov>

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You are receiving this email as part of an online service administered by New York State Parks, Recreation and Historic Preservation's Division for Historic Preservation, also known as the New York State Historic Preservation Office (SHPO). The Cultural Resource Information System (CRIS) is an advanced Geographic Information System application that provides access to New York State's vast historic and cultural resource databases and digitized paper records. In addition, CRIS serves as an interactive portal for agencies, municipalities and the public who use or require consultation with our agency on historic preservation programs or issues.

Our email to you is in direct response to material that was submitted to our office regarding a project for which you were identified as a contact. Such projects include actions that are reviewable by our agency under the National Historic Preservation Act of 1966 (Section 106), the New York State Historic Preservation Act (Section 14.09 NYSPRHPL), or the State Environmental Quality Review Act (SEQRA).

If you did not enter this project directly into CRIS, you are receiving this notification as SHPO or another project contact has entered it in our system. You will receive future correspondence for this project via email.

You may edit the above submission through the **My Consolidated Responses** or **My Information Requests** tab on your Home dashboard if you are a registered project contact, or by following the steps below:

1. Click or browse to the following URL: <https://cris.parks.ny.gov?type=CR&id=XJLITS3STJ4J>

2. At the CRIS Legal Disclaimer, click **I Agree** to proceed.

3. Click **Proceed as Guest** or log in with an NY.gov ID account.

If the consolidated response page does not display automatically after you follow the above steps, proceed with the steps below.

A. In the top navigation bar, click **Communicate**.

B. In the Communicate menu, click **View and/or Address a Response**.

C. Enter the response token (XJLITS3STJ4J) and click the **Start** button to open the consolidated response page.

D. In the **Information Requests** table, click the **Process** (green cog) button to open the request wizard. **NOTE:** If you edit this submission, please remember to resend the revised submission to SHPO to ensure that it is received again.