State Historic Preservation Office/Office of Parks, Recreation and Historic Preservation (SHPO/OPRHP) Correspondence Summary

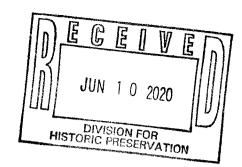
Date	Sender	Recipient	Content
06.10.2020	ConnectGen	SHPO/OPRHP	Notification to stakeholders of PSS
			submission (sent by mail, received
			06.10.2020, uploaded 07.08.20)
06.18.2020	EDR/ConnectGen	SHPO/OPRHP	Initial Consultation Request and
			Visual Outreach Letter
06.22.2020	SHPO/OPRHP	EDR/ConnectGen	Request for Historic Resource
			Survey Methodology
06.24.2020	SHPO/OPRHP	Tonawanda Nation	Project Introduction via email
		Seneca Nation	
0001000	0.120/022112	Tuscarora Nation	
06.24.2020	SHPO/OPRHP	EDR/ConnectGen	Request for Phase IA
			Archaeological Sensitivity
			Assessment and Phase IB Scope of
00.40.2020	CUDO (ODDUD	EDD/Communication	Work
08.19.2020	SHPO/OPRHP	EDR/ConnectGen	SHPO/CRIS receipt of submission of
			Phase IA Historic Resources Survey
11 17 2020	EDD/Commont Com	CUDO (ODDUD	Methodology
11.17.2020	EDR/Connect Gen	SHPO/OPRHP	Recommended Viewpoints Letter
			to Stakeholders (sent by mail,
			received 11.17.2020, uploaded 11.24.20)
01.22.2021	SHPO/OPRHP	EDR/ConnectGen	SHPO/CRIS receipt of submission of
01.22.2021	SHFO/OFKHF	EDN/Connectiden	Phase IA Archaeology Survey
02.08.2021	SHPO/OPRHP	ORES	Concurrence with Phase IA
02.08.2021	Jili O/OF KIII	OKLS	Archaeological Survey and Phase IB
			Survey Recommendation
02.22.2021	SHPO/OPRHP	EDR/ConnectGen	SHPO/CRIS receipt of submission of
02.22.2021	3111 07 01 11111	LDIN COMMECTACIN	Historic Resources Survey Report
03.19.2021	SHPO/OPRHP	ORES	Response to Historic Resources
00.120.12011		0.1.20	Survey Report
05.26.2021	SHPO/OPRHP	ORES	Review of Phase IB Archaeological
	J		Survey/Request for Phase IB
			Addendum
06.08.2021	EDR/ConnectGen	SHPO/OPRHP	Submission of Phase IB Revised
	,	,	Scope
06.10.2021	SHPO/OPRHP	EDR/ConnectGen	Concurrence with the Phase IB
			Revised Scope
06.15.2021	EDR/ConnectGen	Tuscarora Nation	Cultural Resource Survey Overview
06.15.2021	EDR/ConnectGen	Tonawanda Nation	Cultural Resource Survey Overview
06.15.2021	EDR/ConnectGen	Seneca Nation	Cultural Resource Survey Overview
06.23.2021	Seneca Nation/Joe	EDR	Response to Cultural Resource
	Stahlman		Survey Overview
07.28.2021	EDR/ConnectGen	Tuscarora Nation	Cultural Resource Survey Update

07.28.2021	EDR/ConnectGen	Tonawanda Nation	Cultural Resource Survey Update
07.28.2021	EDR/ConnectGen	Seneca Nation	Cultural Resource Survey Update
07.29.2021	SHPO/OPRHP	EDR/ConnectGen	SHPO/CRIS receipt of submission of
			Phase IB Addendum Survey



June 1, 2020

Dear Stakeholder.



On May 22, 2020, the South Ripley Solar Project submitted its Preliminary Scoping Statement (PSS), which provides a more detailed description of the proposed Project, details the studies that will be performed to evaluate potential impacts, and outlines the steps that will be taken to avoid and minimize potential impacts.

Due to ongoing Covid-19 concerns, we are unable to safely hold a public open house meeting at this time. Enclosed in this mailing is a document that contains the information that you would receive at a public open house, including a Project update, the information contained in the PSS, a description of the intervenor funding process, and next steps for the Project.

The South Ripley Solar Project team is available to provide additional information or context as you read through the information. Please submit any questions through the Project website at www.southripleysolar.com or call 1-800-388-8905 to speak to a project team member.

We intend to hold future public open house meetings once it is deemed safe to do so and as the Project progresses. We look forward to being back in the community soon.

Sincerely,

Isaac Phillips

Development Associate



217 Montgomery Street, Suite 1000, Syracuse, New York 13202 P. 315.471.0688 • F. 315.471.1061 • www.edrdpc.com

memorandum

To: Jennifer Walkowski, Survey & National Register Unit

Dr. Josalyn Ferguson, Archaeology Unit

New York State Office of Parks, Recreation and Historic Preservation

Division for Historic Preservation

From: Grant Johnson and Doug Pippin

Environmental Design & Research, Landscape Architecture, Engineering & Environmental

Services, D.P.C. (EDR)

Date: June 18, 2020

EDR Project No: 19020

Reference: Request for Consultation

South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

Siting Board Case 19-F-0560

On behalf of ConnectGen Chautauqua County LLC (ConnectGen or the Applicant), a direct subsidiary of ConnectGen LLC, Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) prepared this request for consultation for the proposed the South Ripley Solar Project (or the Facility), a major renewable energy electric generating facility to be located in the Town of Ripley in Chautauqua County, New York (see Figure 1). The information included in this memorandum is intended to initiate consultation with the New York State Office of Parks, Recreation and Historic Preservation (SHPO) to assist in their review of the Facility under Section 14.09 of the New York State Parks, Recreation, and Historic Preservation Law, and/or Section 106 of the National Historic Preservation Act, as applicable.

Description of the Facility

The South Ripley Solar Project is a proposed 270-megawatt (MW) solar photovoltaic (PV) energy generating project located within the Town Ripley in Chautauqua County, New York. The regional Facility location and Facility Site are depicted on Figures 1 and 2, respectively. The lands being evaluated to host the Facility infrastructure (Facility Site) are rural in nature. Not all land included in the Facility Site will ultimately be developed as part of the Facility. The Facility Site is ultimately expected to include approximately 2,000 acres of leased or purchased private land, consisting primarily of open agricultural fields, fallow fields, and large forest stands. The location of the Facility Site and Facility components will be identified in detail in a forthcoming application to New York State.¹

¹ The Applicant has initiated state permitting with the New York State Board on Electric Generation Siting and the Environment (Siting Board) as set forth under Article 10 of the Public Service Law (Article 10), but may elect to become subject to Section 94-c of the Executive Law, with the Office of Renewable Energy Siting (ORES) as the lead agency. SHPO will be informed of any changes to the lead agency or review process for the Facility. For the purpose of this memorandum, all proposed cultural resources work references the requirements of Article 10.

Agency Consultation

The initial Public Involvement Program (PIP) for the Facility was filed on August 30, 2019²; following receipt of comments from the New York State Department of Public Service (DPS) staff, a Final PIP was filed on October 30, 2019.³ The Preliminary Scoping Statement (PSS) for the South Ripley Solar Project was submitted to NYSDPS on May 22, 2020.⁴ The proposed scopes of work for cultural resources surveys listed below are based on the scopes of work described in the PSS for the Facility.

Archaeological Surveys

As described in 16 NYCRR § 1001.20, an Article 10 application must include:

Exhibit 20: Cultural Resources:

- a. A study of the impacts of the construction and operation of the facility interconnections and related facilities on archaeological resources including:
 - 1. A summary of the nature of the probable impact on any archaeological/cultural resources identified addressing how those impacts shall be avoided or minimized;
 - 2. A Phase IA archaeological/cultural resources study for the Area of Potential Effect (APE) for the facility site and any areas to be used for interconnections or related facilities, including a description of the methodology used for such study;
 - 3. A Phase IB study, if required, as determined in consultation with OPRHP;
 - 4. Where warranted based on Phase I study results as determined in consultation with OPRHP, a Phase II study based on intensive archaeological field investigations shall be conducted to assess the boundaries, integrity and significance of cultural resources identified in Phase I studies. Phase II shall be designed to obtain detailed information on the integrity, limits, structure, function, and cultural/historical context of an archaeological site, as feasible, sufficient to evaluate its potential eligibility for listing on the State or National Register of Historic Places. The need for and scope of work for such investigations shall be determined in consultation with OPRHP and DPS;
 - 5. A statement demonstrating that all archaeological materials recovered during the facility cultural resources investigation shall be cleaned, catalogued, inventoried, and curated according to New York Archaeological Council standards; that to the extent possible, recovered artifacts shall be identified as to material, temporal or cultural/chronological associations, style and function; and that the facility archaeologists shall provide temporary storage for artifacts until a permanent curatorial facility is identified; and
 - 6. An Unanticipated Discovery Plan that shall identify the actions to be taken in the unexpected event that resources of cultural, historical, or archaeological importance are encountered during the excavation process. This plan shall include a provision for work stoppage upon the discovery of possible archaeological or human remains. In addition, the plan shall specify the degree to which the methodology used to assess any discoveries follows the most recent Standards for Cultural Resource Investigations and Curation of Archaeological Collections in New York State. Such an assessment, if warranted, shall be conducted by a professional archaeologist, qualified according to the standards of New York State Archaeological Council.

As noted in the PSS for the Facility, the Applicant does not anticipate significant impacts to archaeological or cultural resources due to Facility construction or operation. Relative to other types of energy generation projects, utility-scale solar facilities present a lower risk for impacts to archaeological resources due to their comparatively minimal amount of ground disturbance required during construction and operation. The site design and construction elements to be

² Available at: http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={B019DE2A-EB40-4915-B7F9-F82219F817A0}

³ Available at: http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={72326AFF-61E5-48C5-AF06-2D461B0C2140}

⁴ Available at: http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefld={26873EB5-22E5-495C-BF20-FF88C78BF634}

used in constructing the Facility will minimize the need for soil disturbance wherever possible, by shifting the Facility components and by utilizing low-impact construction methods.

SHPO has recently developed *Guidelines for Solar Facility Development Cultural Resources Survey Work*⁵ which includes the following requirements for archaeological surveys for solar facilities over 300 acres in size:

A Phase IA archaeological survey, including recommendations for potential Phase IB archaeological field testing, is recommended for all solar facilities covering 300-acres or more.

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 Division'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 Division strongly encourages developers to reduce grubbing and grading activities, reduce the width of trenches to less than 3 feet, 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 (SHPO, 2020).

EDR has performed a preliminary review of the Cultural Resource Information System (CRIS) website and historical documentation relevant to this area. Based on a review of CRIS, no previously recorded archaeological sites are located within 2 miles of the Facility Site. In addition, a review of CRIS determined that the Facility Site is not within an area of archaeological sensitivity. However, based on previous archaeological investigations associated with solar

⁵ New York State Historic Preservation Office (SHPO). 2020. *Guidelines for Solar Facility Development Cultural Resources Survey Work.* New York State Historic Preservation Office, Waterford, NY. June 2020.

facilities located in predominantly rural areas in New York State, there is a moderate potential for archaeological resources to be present at the Facility Site.

In accordance with 16 NYCRR § 1001.20 and the SHPO *Guidelines for Solar Facility Development Cultural Resources Survey Work*, EDR will conduct a Phase IA Archaeological Survey for review and approval by SHPO. The purpose of the Phase IA Archaeological Survey is to:

- Define the Facility's area of potential effect (APE) for Direct Effects relative to archaeological resources⁶
- Determine whether previously identified archaeological resources are located within the APE for Direct Effects
- Propose a methodology to identify archaeological resources within the APE for Direct Effects (i.e., Phase IB subsurface testing), evaluate their eligibility for the State/National Register of Historic Places (S/NRHP), and assess the potential effect of the Facility on those resources

All archaeological studies will be conducted under the supervision of a Registered Professional Archaeologist (RPA) in a manner consistent with the SHPO *Phase I Archaeological Report Format Requirements*⁷ and the *Guidelines for Solar Facility Development Cultural Resources Survey Work* as well as the New York Archaeological Council (NYAC) *Standards for Cultural Resource Investigations and Curation of Archaeological Collections in New York State* (the NYAC *Standards*).⁸

Historic Resources Surveys

As described in 16 NYCRR § 1001.20 (Exhibit 20: Cultural Resources), an Article 10 application must include:

(b) A study of the impacts of the construction and operation of the facility and the interconnections and related facilities on historic resources, including the results of field inspections and consultation with local historic preservation groups to identify sites or structures listed or eligible for listing on the State or National Register of Historic Places within the viewshed of the facility and within the study area, including an analysis of potential impact on any standing structures which appear to be at least 50 years old and potentially eligible for listing in the State or National Register of Historic Places, based on an assessment by a person qualified pursuant to federal regulation (36 C.F.R. 61).

Construction of the Facility is not anticipated to require the demolition or physical alteration of any aboveground historic properties. As the Facility is planned to be constructed almost entirely on open lands, no direct physical impacts to historic properties are anticipated to occur as a result of the Facility. Historically significant properties are defined herein to include buildings, districts, objects, structures and/or sites that have been listed on or have been determined eligible for listing on the S/NRHP.

⁶ It is anticipated that the APE for Direct Effects will change as the Facility's design advances and becomes more refined.

⁷ SHPO. 2005. New York State Historic Preservation Office (SHPO) Phase 1 Archaeological Report Format Requirements. New York State Historic Preservation Office, Waterford, NY.

⁸ New York Archaeological Council (NYAC). 1994. Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY.

The Facility's potential effect on aboveground historic properties may result in a change (resulting from the introduction of PV panels or other Facility components) in the visual or auditory setting associated with a given historic property. These potential effects may be highly variable and are dependent on several factors, including distance to the Facility, the number of visible panels/components, the extent to which the Facility is screened or partially screened by buildings, trees, or other objects, and the amount of existing visual clutter and/or modern intrusions in the view. In addition, visibility of the Facility from surrounding areas is anticipated to be very limited because the height of the PV arrays will not exceed approximately 12 feet above grade and the forested areas and topography surrounding the Facility Site will serve to significantly restrict visibility.

The SHPO *Guidelines for Solar Facility Development Cultural Resources Survey Work* established the following preliminary guidance for the assessment of historic and cultural resources associated with the development of ground-mounted solar facility projects covering 100 acres or more in New York State:

Visual Impact Area for Historic Resources

- 4. Solar arrays covering 100 acres or more.
 - i. Complete a GIS analysis of areas that will have positive visibility of the solar field based upon topography only (do not factor in vegetation).
 - ii. A survey of all properties 50 years old or older within 2 miles of the solar array should be completed.*
 - iii. Identification of any New York State and/or National Register listed property or district or National Historic Landmark within 5 miles of project with positive visibility.

*NOTE: The determined distance of survey from the solar field is for those areas that fall within the positive viewshed as established by the GIS analysis only.

To ensure that potential visual effects on regional visually sensitive historic resources are adequately considered in the application process, and consistent with SHPO guidance, all areas of potential Facility visibility within a 5-mile radius Historic Resources Study Area will be evaluated in all support studies related to aboveground historic properties (see Figure 3). The Historic Resources Study Area will be used for the purpose of identifying historic properties and evaluating visibility and potential visual impacts to those properties listed on or determined by SHPO to be eligible for listing on the S/NRHP, and is defined as the areas within five miles of the Facility's participating parcel boundaries (i.e., the Facility Site). The APE for Indirect Effects on historic resources includes those areas where the Facility may result in indirect effects on cultural resources, such as visual or auditory impacts. As presently envisioned, the APE for Indirect Effects would be confined to areas where the Facility would be visible (based on a viewshed analysis considering only topography) or where noise created by the Facility would be noticeable.

A preliminary review of the CRIS website indicates there are 11 properties previously determined eligible for listing on the S/NRHP, and 25 properties for which S/NRHP eligibility has not been formally determined located within the Historic Resources Study Area. No properties and districts listed on the S/NRHP or National Historic Landmarks are located within the Historic Resources Study Area.

In accordance with 16 NYCRR § 1001.20 and the SHPO *Guidelines for Solar Facility Development Cultural Resources Survey Work*, EDR will conduct a Phase IA Historic Resources Survey for review and approval by SHPO. The purpose of the Phase IA Historic Resources Survey is to:

- Propose an APE for Indirect Effects to serve as the basis for the historic resources survey⁹
- Identify previously inventoried historic properties within the Facility's APE for Indirect Effects
- Consult municipalities as well as local stakeholders (such as municipal historians and regional historical societies) to identify locally significant historic properties within the Historic Resources Study Area and APE for Indirect Effects
- Provide a scope of work for additional survey of historic properties within the Facility's APE for Indirect Effects
 in accordance with the SHPO Guidelines for Solar Facility Development Cultural Resources Survey Work

All historic resources surveys will be prepared by qualified architectural historians who meet the U.S. Secretary of Interior's Standards for Historic Preservation Projects (36 CFR Part 61) and in a manner consistent with the SHPO Guidelines for Solar Facility Development Cultural Resources Survey Work.¹⁰

Summary

EDR has provided this request for consultation to SHPO in advance of conducting cultural resources surveys for the Facility to ensure that the scope of the proposed surveys is consistent with SHPO's expectations. Please provide a formal response indicating SHPO's concurrence with and/or comments on the methodologies described herein.

If you have any questions/concerns or would like to discuss the information described herein, please contact Grant Johnson by email at gjohnson@edrdpc.com, or by phone at (315) 471-0688 ext. 642.

Grant Johnson

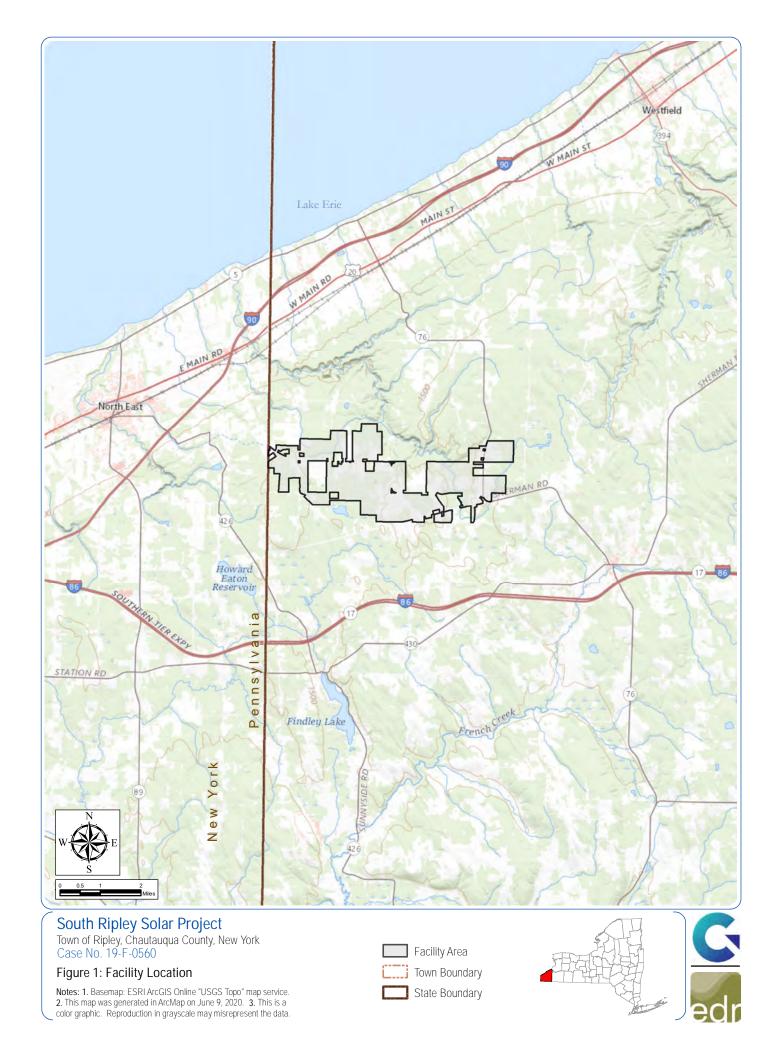
Senior Project Manager – Historic Preservation

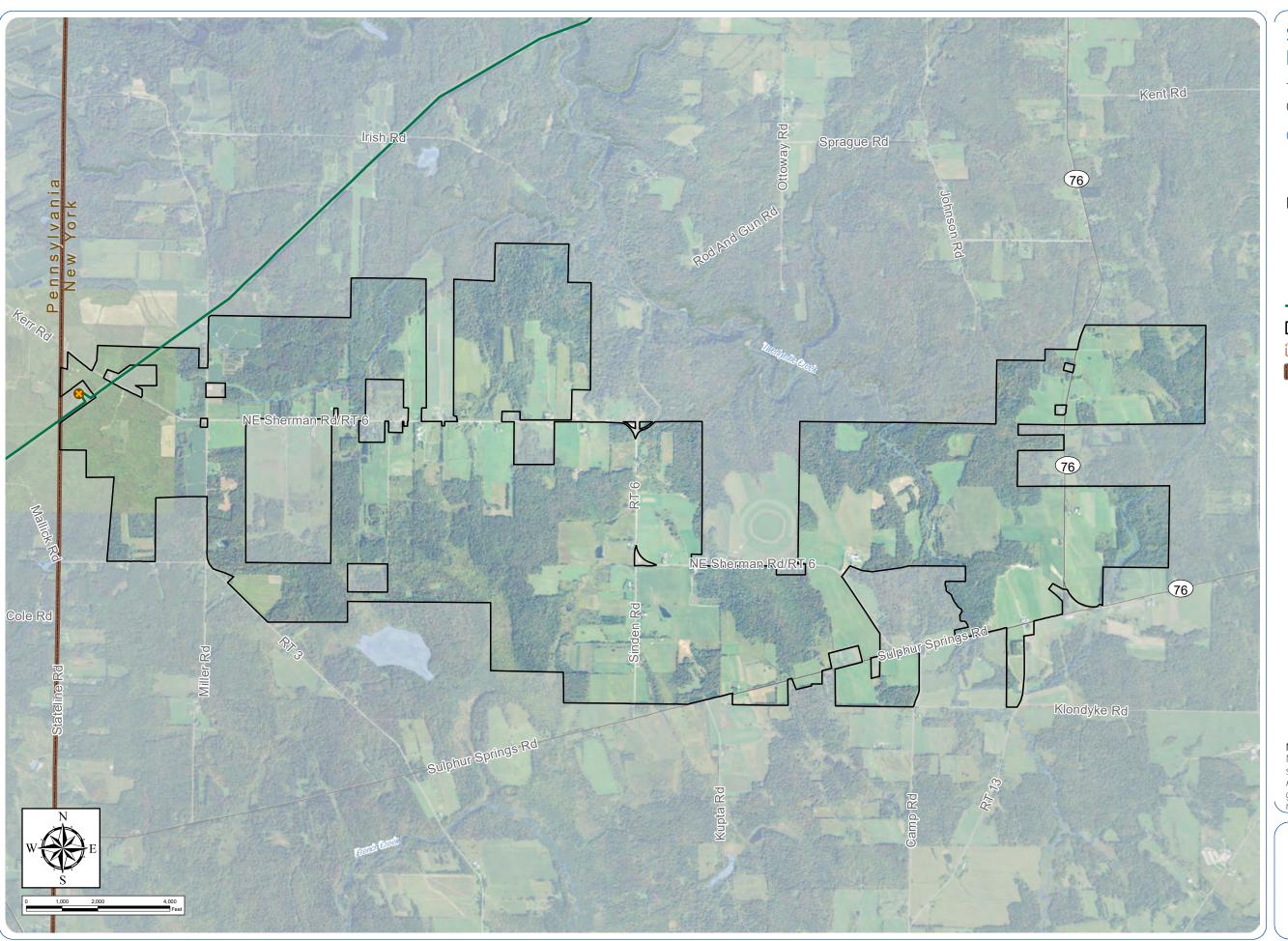
Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C.

Attachments:

- Figure 1. Regional Facility Location
- Figure 2. Facility Area
- Figure 3. Five-Mile Study Area

⁹. The Facility's APE relative to historic resources will likely be revised in association with subsequent layout changes during the permitting process, which will be documented in the Historic Resources Survey report that is anticipated to be prepared as a subsequent step in the consideration of the Facility's potential effect on historic properties.





South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

Case No. 19-F-0560

Figure 2: Facility Area

Existing Substation

Existing Transmission Line

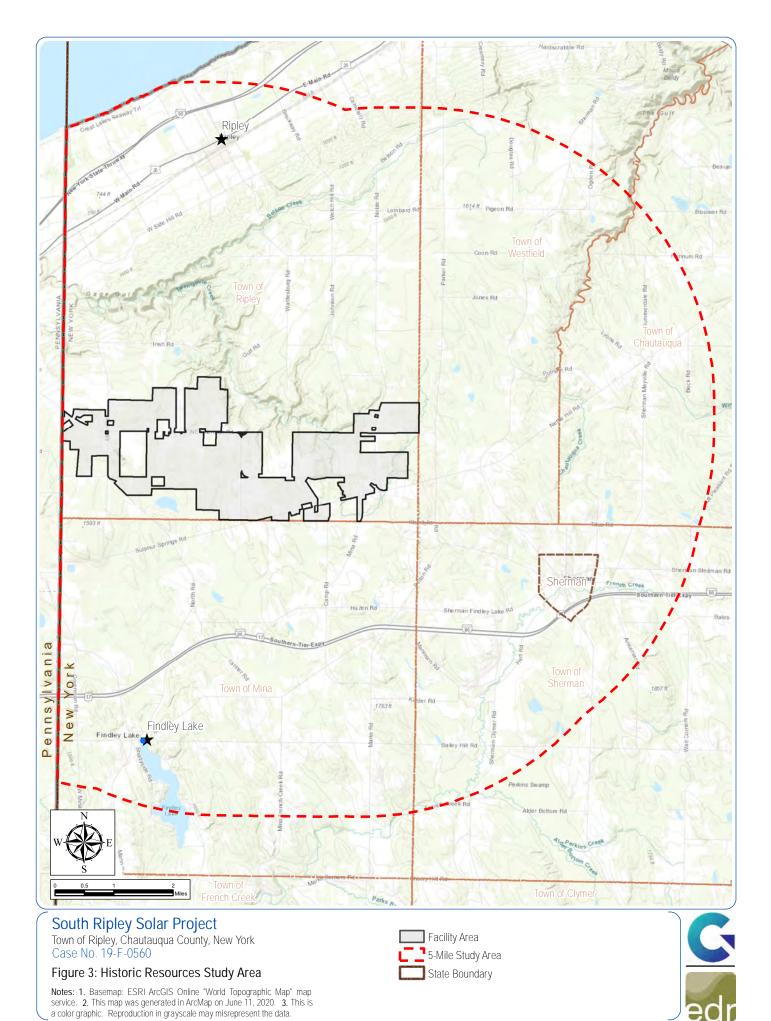
Facility Area

Town Boundary

State Boundary

Notes: 1. Basemap: USDA NAIP "2019 New York 60cm" orthoimagery map service. 2. This map was generated in ArcMap on June 9, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.







ANDREW M. CUOMO Governor ERIK KULLESEID
Commissioner

June 22, 2020

Mr. Grant Johnson Senior Project Manager – Historic Preservation Environmental Design & Research, D.P.C. (EDR) 217 Montgomery Street, Suite 100 Syracuse, NY 12303

Re: DPS

South Ripley Solar Project/270 MW/2000 acres Towns of Ripley, Mina, and Westfield, Chautauqua County, NY 20PR03687

Dear Mr. Johnson:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the provided documentation in accordance with Section 14.09 of the New York State Historic Preservation Act of 1980. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include other environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

Upon review of the Request for Consultation memorandum and Identification of Visually Sensitive Resources document provided to our office via CRIS on June 18, 2020, we concur with your general approach to the Historic Resource Survey, and we look forward to receiving any information on the Zone of Visual Influence (ZVI) as well as your Methodology/Survey Work Plan. Upon approval of the ZVI and your Methodology/Survey Work Plan, you will be given access to the Trekker mobile survey application.

If you have questions or comments, please contact Jennifer Walkowski at <u>Jennifer.walkowski@parks.ny.gov</u>.

Sincerely,

Jennifer Walkowski

Historic Preservation Program Analyst

awd

Survey and National Register Unit – Western NY Region

(via email)

From: Ferguson, Josalyn (PARKS)

To: Christine Abrams (and Chief Roger Hill) (tonseneca@aol.com); Joe Stahlman, Ph.D. (joe.stahlman@sni.org);

Bryan Printup (bprintup@hetf.org); Alex Page

Subject: 20PR03687 South Ripley Solar Project/270 MW/2000 acres

Date: Wednesday, June 24, 2020 11:38:00 AM

Attachments: South Ripley Solar Request for SHPO Consultation.pdf

20PR03687 300 Acre Plus Solar Facility Memo.pdf

NYS DPS Article 10 Participation Information June 2020.pdf

Good morning everyone,

I hope this email finds you well on this beautiful and cooler day after yesterday's much needed rain. I am reaching out to you today on behalf of OPRHP to let you know of a new Article 10 Solar Project that was submitted to our office for review this week, and to respectfully request the initiation of consultation with the Tonawanda Seneca Nation, the Tuscarora Nation and the Seneca Nation of Indians. The South Ripley Solar Project is in the town of Ripley, Chautauqua County, and is mainly aligned with or focused around NE Sherman Road. The Solar farm is proposed to be 270MW and approximately 2000 acres in size. Only a very small portion of the project APE is within a grey shaded area, as according to our CRIS records only 1 previously recorded archaeological site indicated within 1 mile of the project APE (the initial scoping document was remiss in this respect, see attached). No survey's have been recorded within the APE. At present, USACE is not involved in the project, but it is our understanding that it will be at a later date, and thus this project will eventually be reviewed under Section 106. In response to EDR's request for review, OPRHP has requested the submission of a Phase IA Archaeological Literature Review & Sensitivity assessment, and a scope of work for the Phase IB Testing (see attached), which we have indicated also needs to be provided to the Nations for review when it has been completed. I am also forwarding you a document OPRHP was provided by Andrew Davis of DPS regarding participation in the NYS DPS Article 10 proceedings, for your perusal. I have added Joe and Alex to the contacts to the project in CRIS. If you would like other contacts added, please let me know.

As always please feel free to contact me should you have any questions or comments you would like to discuss.

Best wishes, Josalyn

Josalyn Ferguson, Ph.D.

Scientist Archaeology
Division for Historic Preservation

New York State Parks, Recreation & Historic Preservation
Peebles Island State Park, P.O. Box 189, Waterford, NY 12188
(518)268-2218 / Josalyn.Ferguson@parks.ny.gov
https://parks.ny.gov/shpo

The NYS Division for Historic Preservation is working on the 2021-2025 State Historic Preservation Plan. We invite you to take a brief survey to help inform the outcome of the plan, which can be found here.

Are you registered to vote? Register to vote online today. Moved recently? Update your information with the NYS Board of Elections. Not sure if you're registered to vote? Search your voter registration status.



ANDREW M. CUOMO Governor ERIK KULLESEID
Commissioner

ARCHAEOLOGY COMMENTS

Phase IA/IB Archaeological Survey Recommendation for Solar Facilities

Project: South Ripley Solar Project/270 MW/2000 acres (Article 10)

PR#: 20PR03687 Date: June 24, 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.

The pertinent Indian Nations should be provided with 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. Indian Nation Consultation under the Article 10 review will be initiated by OPRHP under our office's *Consultation on Historic Properties with Indian Nations and Tribes* Policy (Directive HP-POL-005, effect 11/01/2016).

...2

Page 2.

Please be aware that an error in identifying known archaeological sites within a one (1) mile radius of the project was made in the initial project scoping document. A portion of the Project's Area of Potential Effects (APE) is within an archaeologically sensitive area.

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 Josalyn.Ferguson@parks.ny.gov.

From: New York State Parks CRIS Application

To: Grant Johnson; Doug Pippin; Kristen Olson; William Whipps; John Kuba; Isaac Phillips; Derek Rieman;

andrew.davis@dps.ny.gov; joe.stahlman@sni.org; alex.c.page@gmail.com

Subject: SHPO Unrequested Submission Accepted for Consultation Project: 20PR03687

Date: Wednesday, August 19, 2020 10:52:54 AM

[EXTERNAL SENDER]

This message is a notification from the New York State Historic Preservation Office (SHPO) through its Cultural Resource Information System (CRIS). Unrequested submission 83QCQQXWHQBX has been accepted for project 20PR03687 (South Ripley Solar Project/270 MW/2000 acres / Siting Board Case 19-F-0560). Its new submission number is 20PR03687.003. Below is the submission description provided by the submitter:

Phase IA Historic Resources Survey report for the South Ripley Solar Project

No action on your part is required at this time. SHPO review of the submission is currently in progress, and you will receive updates by email.

If you have any questions about CRIS, please contact CRIS Help at 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

Are you registered to vote? Register to vote online today. Moved recently? Update your information with the NYS Board of Elections. Not sure if you're registered to vote? Search your voter registration status.

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 access the project in CRIS at https://cris.parks.ny.gov/. If you are a registered CRIS user, the project will appear in the My Projects tab on your Home dashboard. If you are a guest user, you may view the project details using the Find My Project form on the CRIS Home page after you click Proceed as Guest, or by entering the submission token (83QCQQXWHQBX) in the Lookup tab on the Search page.



Environmental Design & Research,

Landscape Architecture, Engineering & Environmental Services, D.P.C.

217 Montgomery Street, Suite 1000, Syracuse, New York 13202 P. 315,471,0688 • F. 315,471,1061 • www.edrdpc.com



November 12, 2020

Municipal Planning, State Agency and Local Representatives Per Distribution List

RE: South Ripley Solar Project

Recommended Viewpoints - Official Request for Information

Dear Municipal Planning, State Agency and Party List Representative:

As you may be aware, ConnectGen Chautauqua County LLC (ConnectGen or the Applicant), a direct subsidiary of ConnectGen LLC, is proposing to construct the South Ripley Solar Project (Project), a 270 megawatt (MW) alternating current (AC) photovoltaic (PV) solar energy generation facility (Project), that may include up to 20 MW (80 megawatt hours [MWh]) of battery energy storage capacity located in the Town of Ripley, Chautauqua County, New York. The proposed Project is subject to the rules for siting a major electric generating facility under Article 10 of the New York State Public Service Law (PSL). In accordance with the Article 10 regulations, a Public Involvement Program (PIP) plan for this Project was filed in October 2019 and a Preliminary Scoping Statement (PSS) was filed in May 2020. Please refer to the PIP and the PSS for additional details regarding the proposed Project. This information will be available at the Project's website, http://www.southripleysolar.com, and will also be available on the Department of Public Service (DPS) Document Matter Management (DMM) website at:

http://documents.dps.nv.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=19-F-0560&submit=Search

The purpose of this letter is to request your recommendation for viewpoints that should be considered for the preparation of visual simulation of the proposed Project. The information presented in this letter and its enclosures is intended to provide you with sufficient context and information to assist with the identification of these viewpoints. Your contribution to the viewpoint selection is respectfully requested by December 14, 2020. The contact information for responses is listed at the conclusion of this letter.

In accordance with the Article 10 regulations, Environmental Design and Research, Landscape Architecture, Engineering and Environmental Services, DPC (EDR) is conducting a Visual Impact Assessment (VIA) for the proposed Project on behalf of the Applicant. A previous VIA-related visual outreach letter was circulated on May 20, 2020, which requested input regarding the identification of visually sensitive resources, sites and/or areas. This letter serves as a follow-up to the initial outreach letter and summarizes the VIA analyses conducted by the Applicant to date. In addition, this letter includes recommendations for viewpoints (or photo locations) from which photo-realistic visual simulations of the Facility will be prepared.

Recommendations for Visual Simulations

EDR anticipates preparing approximately 10 visual simulations, which will depict proposed Facility components from representative distances and a range of visual settings within the VSA. The final selection of viewpoints will be determined based on the proposed Facility layout to ensure that the recommended viewpoints/photographs appropriately address the visual effect of the Facility and its components. EDR has identified 13 candidate viewpoints (Attachment D – Recommended Viewpoint Table) that are representative of the range and types of views that will be selected for simulations. Based on EDR's experience, the recommended simulation viewpoints will be adequate for characterizing potential visibility of the Facility and its components and evaluating the Facility's potential visual effect.

Feedback Request

ConnectGen is formally requesting the feedback of agencies and municipal planning representatives regarding the recommended viewpoints for visual simulations. Please review the recommended list of viewpoints and provide feedback regarding locations of concern that you would like to be considered as candidate viewpoints for visual simulations and evaluation.

To provide comments or feedback regarding the visual study and the recommended viewpoints, please contact Matthew Robinson by December 14, 2020.

- Via email at mrobinson@edrdpc.com
 Please type "South Ripley Solar Visual Resources" in the subject line, or
- Via mail:

Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C.

Attn: Matthew Robinson

217 Montgomery Street, Suite 1100

Syracuse, New York 13202

We sincerely appreciate your assistance and input,

Matthew Robinson

Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C.

On behalf of ConnectGen Chautaugua County, LLC.

Materials Found Online at the Sharepoint site below:

https://edrco.sharepoint.com/:f:/s/EDRProjects/EpT9tBckOFBPhglou-e0yZQBnZd6oZiQagwf62FeDy9j0g?e=T3Atdx

- Attachment A: Project Visibility and Recommended Viewpoint Locations
- Attachment B: Recommended Viewpoints Table
- Attachment C: Viewpoint Photolog (including the recommended candidates for visual simulation)
- Attachment D: Landscape Similarity Zones
- Attachment E: Distribution List

From: New York State Parks CRIS Application

To: Grant Johnson; Doug Pippin; Kristen Olson; William Whipps; John Kuba; Isaac Phillips; Derek Rieman;

andrew.davis@dps.ny.gov; joe.stahlman@sni.org; alex.c.page@gmail.com; Moaveni, Houtan (ORES) SHPO Requested Submission Received for Requested Archaeological Survey Project: 20PR03687

Date: Friday, January 22, 2021 6:29:38 PM

[EXTERNAL SENDER]

Subject:

This message is a notification from the New York State Historic Preservation Office (SHPO) through its Cultural Resource Information System (CRIS). Requested submission YE9OAT69MNHB has been received for project 20PR03687 (South Ripley Solar Project/270 MW/2000 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 20PR03687.001 (response token EXAFOEOUVRIW): The SHPO thus recommends a Phase IA Literature Search & Sensitivity Assessment Survey and a Phase IB Scope of work be prepared (see attached memo) by an archaeologist who meets the Secretary of the Interior's 36CFR61 professional qualifications. Please use the enclosed Cultural Resource Information System (CRIS) token (green cog-wheel symbol) to submit the resulting Phase IA/Phase IB Scope of Work to our office for review. These documents should also be provided to the involved Indian Nations. Please contact me to determine the appropriate Nations and contact information when the documents have been completed. I can be reached at josalyn.ferguson@parks.ny.gov.

If you have any questions about CRIS, please contact CRIS Help at 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

Are you registered to vote? Register to vote online today. Moved recently? Update your information with the NYS Board of Elections. Not sure if you're registered to vote? Search your voter registration status.

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=EXAFOEOUVRIW
- 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 (EXAFOEOUVRIW) 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.



ANDREW M. CUOMO Governor ERIK KULLESEID
Commissioner

February 8, 2021

Mr. Houtan Moaveni Executive Deputy Director Office of Renewable Energy Siting 99 Washington Ave Albany, NY 12231

Re: DPS

South Ripley Solar Project/270 MW/2000 acres ~2000 acres within Town of Ripley, Chautauqua County, NY 20PR03687 Siting Board Case 19-F-0560

Dear Mr. Moaveni:

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 Phase IA Archaeological Survey report prepared by EDR (Fragnito et al. January 2021; 21SR00061) 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.

Based upon our review, OPRHP concurs with the report's conclusion that 100% of the Limits of significant ground disturbance identified as having elevated sensitivity (for either archaeological resources or historical Map Documented Structures (MDS)) be subject to a Phase IB archaeological survey. Any changes to the proposed project's design are to be investigated consistent with the sensitivity model and research design presented in the Phase IA report. OPRHP thus concurs with the Phase IB testing protocol outlined within the Phase IA report, with the addition of the following:

- Within the Phase IB report, add a discussion as to whether there is the potential for deeply buried cultural deposits to be impacted by the project; and if so, discuss the impacts proposed (if any) in the relevant locations, the testing strategy implemented in those locations as appropriate, and add the locations of potential deeply buried deposits to the sensitivity map.
- 2. Isolated Native American finds identified during pedestrian surveys are to have shovel test pit excavations conducted at one (1) and three (3) meter intervals around find-spots.

If EDR has not already submitted the Phase IA report to the involved Native American Nations, please do so now for their review and comment. I have provided the appropriate contact information below. Upon completion of the Phase IB report, please submit it to OPRHP using the Cultural Resource Information System (CRIS) survey token provided in association with this correspondence, and to the involved Native American Nations for their review and comment:

Mr. Houtan Moaveni February 8, 2021 Page 2.

Indian Nation Contact Information

Tonawanda Seneca Nation (TSN) Chief Hill and Christine Abrams

Tonawanda Seneca Nation 7027 Meadville Road Basom, NY 14013 (716) 542-4244 tonseneca@aol.com

AND

Alex Page (Tonawanda Seneca Nation Attorney)
Berkey Williams
616 Whittier St. NW
Washington, DC
20012
alex.c.page@gmail.com

Seneca Nation of Indians (SNI)

Dr. Joe Stahlman and President Matthew Pagels

Seneca Nation of Indians Seneca-Iroquois National Museum Onõhsagwë: De' Cultural Center 82 W. Hetzel St. Salamanca, NY 14779 (716) 945-1760 joe.stahlman@sni.org

Tuscarora Nation Bryan Printup

Tuscarora Nation 5226 Walmore Road Lewiston, NY 14092 (716) 264-6011 press 0 bprintup@hetf.org

Please refer to the OPRHP Project Review (PR) number noted above in future correspondence regarding this project. If you have any questions, please contact me via email at Josalyn.Ferguson@parks.ny.gov.

Sincerely,

Josalyn Ferguson, Ph.D. Scientist Archaeology

via email only

c.c. Alex Page, TSN Attorney

c.c. Andrew Davis, DPS

c.c. Derek Rieman, Issac Phillips & John Kuba, ConnectGen

c.c. Joe Stahlman, SNI

c.c. Doug Pippin, Grant Johnson, Kristen Olson & William Whipps, EDR

From: New York State Parks CRIS Application

To: Grant Johnson; Doug Pippin; Kristen Olson; William Whipps; John Kuba; Isaac Phillips; Derek Rieman;

andrew.davis@dps.ny.gov; joe.stahlman@sni.org; alex.c.page@gmail.com; Moaveni, Houtan (ORES)

Subject: SHPO Requested Submission Received for Consultation Project: 20PR03687

Date: Monday, February 22, 2021 3:37:51 PM

[EXTERNAL SENDER]

This message is a notification from the New York State Historic Preservation Office (SHPO) through its Cultural Resource Information System (CRIS). Requested submission 1R1C2ICUSMYP has been received for project 20PR03687 (South Ripley Solar Project/270 MW/2000 acres / Siting Board Case 19-F-0560).

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 20PR03687.005 (response token ECAJF1Q3MBS6): *Please upload the Survey Report after the Trekker Surveys are complete.*

If you have any questions about CRIS, please contact CRIS Help at 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

Are you registered to vote? Register to vote online today. Moved recently? Update your information with the NYS Board of Elections. Not sure if you're registered to vote? Search your voter registration status.

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=ECAJF1Q3MBS6
- 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 (ECAJF1Q3MBS6) 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.



ANDREW M. CUOMO Governor

ERIK KULLESEID
Commissioner

March 19, 2021

Mr. Houtan Moaveni Executive Deputy Director Office of Renewable Energy Siting 99 Washington Ave Albany, NY 12231

Re: DPS

South Ripley Solar Project/270 MW/2000 acres ~2000 acres within Town of Ripley, Chautauqua County, NY 20PR03687 Siting Board Case 19-F-0560

Dear Mr. Moaveni:

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).

The project consists of a 270-megawatt (MW) solar photovoltaic (PV) energy generating project. The Facility Site is ultimately expected to include approximately 2,000 acres of leased or purchased private land, consisting primarily of open agricultural fields, fallow fields, and large forest stands. We understand that the location of the Facility Site and Facility components will be identified in detail in a forthcoming application to New York State.

Our Survey and National Register staff reviewed the architectural survey you submitted and two historic sites have been identified that are going to be visually impacted by the solar project. These are:

- 1.Sawer-Swezey-Kehrli Farm Complex
- 2. South Ripley Cemetery

We will be reviewing the project for its potential visual impact on these two sites and we look forward to reviewing the facility site and facility components when they become available.

We continue to consult with you regarding archelolgy issues.

We would appreciate if the requested information could be provided via our Cultural Resource Information System (CRIS). If you have any questions, I can be reached at sloane.bullough@parks.ny.gov.

Sincerely,

Sloane Bullough

Historic Sites Restoration Coordinator

Sloane Bullough

via email only



ANDREW M. CUOMO Governor ERIK KULLESEID
Commissioner

May 26, 2021

Mr. Houtan Moaveni Executive Deputy Director Office of Renewable Energy Siting 99 Washington Ave Albany, NY 12231

Re: DPS/ORES

South Ripley Solar Project/270 MW/2000 acres

~2000 acres within Town of Ripley, Chautaugua County, NY

20PR03687

Siting Board Case 19-F-0560

Dear Mr. Moaveni:

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 Phase IB Archaeological Survey report prepared by EDR (Yankel et al. April 2021; 21SR00269) 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.

Based upon our review of the above-noted report, it appears that not all significant ground-disturbing impacts in areas of elevated sensitivity within the project's Area of Potential Effects (APE) were subject to the Phase IB Archaeological Survey. Moreover, it is our understanding that there have been significant changes to the proposed facility since the initial Phase IB was conducted. Before we provide our comments, OPRHP is requesting a Phase IB Addendum be conducted in all areas of substantial ground-disturbing impacts in areas of elevated archaeological sensitivity that were not previously surveyed or have since been added to the facility plans. Substantial ground-disturbing impacts that require archaeological investigations in areas of elevated sensitivity include the following:

- Grading and excavations more than six (6) inches deep (i.e., for access roads, land clearance/ leveling, staging/laydown areas; substations, battery/inverter locations, drainage, etc.)
- Grubbing, tree and stump removal
- Trenches more than three (3) feet wide (i.e. underground collection lines, etc.).

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

Mr. Houtan Moaveni May 26, 2021 Page 2.

Please submit the Phase IB Addendum report, including a zipped polygon shapefile of the Addendum Ph. IB's survey area using the Cultural Resource Information System (CRIS) survey token provided with this correspondence.

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 at Josalyn.Ferguson@parks.ny.gov.

Sincerely,

Josalyn Ferguson, Ph.D. Scientist Archaeology

via email only

- c.c. Alexandra Page, Cole Reuben & Christine Abrams, TSN
- c.c. Andrew Davis, DPS
- c.c. Bryan Printup, Tuscarora Nation
- c.c. Derek Rieman, Isaac Phillips & John Kuba, ConnectGen
- c.c. Joe Stahlman, SNI
- c.c. Douglas Pippin, Grant Johnson, Justin Sabino, Kristen Olson & William Whipps, EDR



Memorandum

To: Josalyn Ferguson, Ph.D., Nancy Herter, Ph.D.

New York State Office of Parks, Recreation, and Historic Preservation

From: Patrick Heaton, RPA; Doug Pippin, Ph.D., RPA

Date: June 8, 2021

Reference: South Ripley Solar Project (20PR03687)

Supplemental Phase IB Research Design

EDR Project No: 19020

Dear Josalyn and Nancy,

Per our recent discussions, this memo summarizes EDR's proposed approach to completing a Supplemental Phase IB Archaeological Survey for the South Ripley Solar Project ("Project"). The Supplemental IB is being conducted in consideration of NYSOPRHP/NYSHPO's comments on the Phase IB Archaeological Survey Report and in order to address Project design changes that have resulted in revised limits of ground disturbance for the project.

EDR is proposing a revision to our archaeological sensitivity model for the Project, which is informed by the results of Phase IB survey conducted to date, improved environmental data for the site (i.e., delineated wetlands), consultation with NYSOPRHP/NYSHPO, and the NYSHPO's 2020 *Guidelines for Solar Facility Development Cultural Resources Survey Work* (hereafter, the NYSHPO Solar Guidelines).

As part of the Phase IA Archaeological Survey report (January 2021) for the Project, EDR proposed an archaeological sensitivity model that defined areas of high or elevated archaeological sensitivity to include:

- 1. Areas within 1,000 feet (305 m) of known archaeological sites (NYSOPRHP/NYSM Sites).
- 2. Areas within known NYSM Areas.

And Areas where 2 out of the 3 following environmental variables apply:

- 3. Areas within 1,500 feet (457 meters) of water, wetlands, or hydric soils.
- 4. Soils classified as moderately well drained, well drained, somewhat excessively drained, and excessively drained, according to ESRI and SSURGO (2020) soils mapping.
- 5. Ground slope of 5% or less.

Phase IB archaeological survey conducted to date for the Project consisted of shovel testing within areas where substantial proposed ground disturbance (per the NYSHPO Solar Guidelines)

overlapped with areas of high sensitivity (per the model above). The Phase IB survey resulted in the identification of 15 archaeological sites within the Facility Site. Of these 15 sites, 11 were located less than 328 feet (100 m) from water, consistent with the recommended environmental variables in the NYSHPO Solar Guidelines. Of the remaining 4 sites, 3 were isolated artifacts and the fourth consisted of 2 chert flakes from 2 shovel tests. None of these sites have been recommended to be NRHP-eligible. In addition, sites were identified in soils with drainage classes that included excessively drained, somewhat excessively drained, well drained, moderately well drained, and somewhat poorly drained. Based on these data and the NYSHPO Solar Guidelines, EDR refined the archaeological sensitivity model for the Facility Site – areas of elevated/high archaeological sensitivity per the revised model include [revisions to the model are in bold]:

- 1. Areas within 1,000 feet (305 m) of known archaeological sites (NYSOPRHP/NYSM Sites).
- 2. Areas within known NYSM Areas.
- 3. Areas within 328 feet (100 m) of delineated wetlands, streams, or hydric soils.
- 4. Soils classified as **somewhat poorly drained**, moderately well drained, well drained, somewhat excessively drained, and excessively drained, according to ESRI and SSURGO (2020) soils mapping.
- 5. Ground slope of 5% or less.

The attached Map shows the revised sensitivity model, limits of proposed substantial ground disturbance (per the revised project layout), areas tested during the prior Phase IB archaeological survey, and remaining areas to be tested in the Supplemental Phase IB survey. The remaining areas to be tested total approximately 110-115 acres.

EDR has initiated the Supplemental Phase IB Archaeological Survey consistent with the methods and research design (except as noted herein) previously presented in our Phase IA and Phase IB reports. The revised archaeological sensitivity model and rationale for revising the model (as summarized herein) will be described in the Supplemental Phase IB Archaeological Survey report.

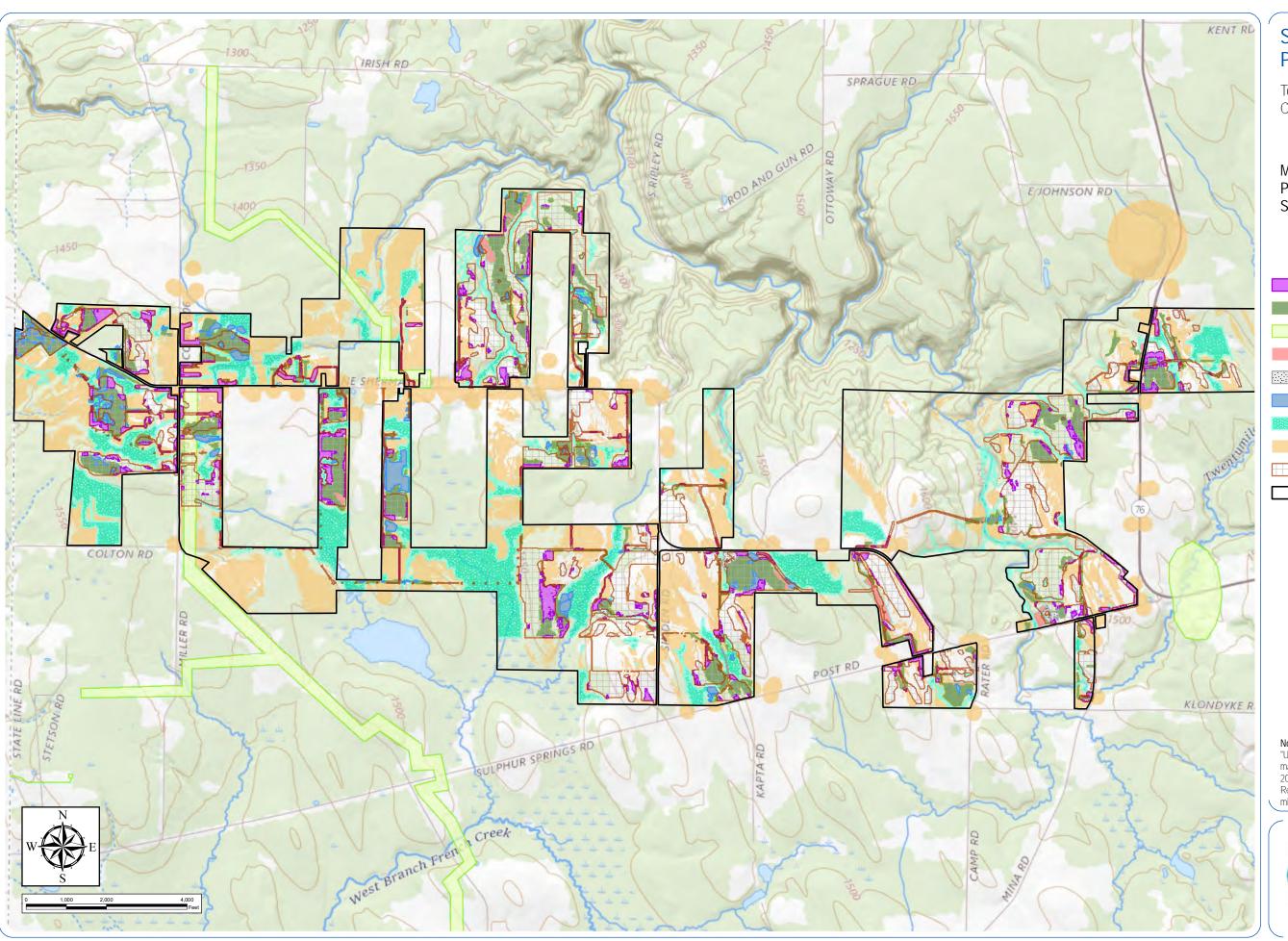
Please contact Patrick Heaton at pheaton@edrdpc.com or 315.471.0688x621 if you have any concerns or would like to further discuss the proposed approach for the Supplemental Phase IB Archaeological Survey.

Thank you,

Patrick Heaton

Principal, EDR

Attachment: Map 1. Supplemental Phase IB Archaeological Survey Research Design



South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

Map 1. Supplemental Phase IB Archaeological Survey Research Design

Remaining Survey Area

EDR 2020 Phase IB Shovel Tested Area

Previous Archaeological Survey

Field Identified Steep Slope

Field Identified Disturbance
Field Identified Inundated Terrain

Delineated Wetland/Stream

Archaeological Sensitive Area

Limits of Significant Soil Disturbance

Facility Site

Notes: 1. Basemap: ESRI ArcGIS Online
"USA Topo Maps" map service. 2. This
map was generated in ArcMap on June 9,
2021. 3. This is a color graphic.
Reproduction in grayscale may
misrepresent the data.



ANDREW M. CUOMO Governor ERIK KULLESEID
Commissioner

June 10, 2021

Patrick Heaton, Director of Cultural Resources
Environmental Design & Research, Landscape Architecture, Engineering, & Environmental
Services, DPC
217 Montgomery Street, Suite 1000
Syracuse, NY 13202

Re: DPS

South Ripley Solar Project/270 MW/2000 acres ~2000 acres within Town of Ripley, Chautauqua County, NY 20PR03687 Siting Board Case 19-F-0560

Dear Patrick Heaton:

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 your memo of June 8, 2021, 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.

Based upon our review, OPRHP concurs with the proposed revised scope of work for the Phase IB Addendum survey presented in the above-noted memo (see attached).

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. A. Page, C. Reuben, C. Abrams & Chief Hill, TSN

c.c. A. Davis, DPS

c.c. Bryan Printup, Tuscarora Nation

c.c. D. Rieman, I. Phillips & J. Kuba, ConnectGen

c.c. D. Pippin, G. Johnson, J. Sabino, K. Olson & W. Whipps

c.c. H. Moaveni, ORES

c.c. J. Stahlman, SNI

Attch.



Memorandum

To: Josalyn Ferguson, Ph.D., Nancy Herter, Ph.D.

New York State Office of Parks, Recreation, and Historic Preservation

From: Patrick Heaton, RPA; Doug Pippin, Ph.D., RPA

Date: June 8, 2021

Reference: South Ripley Solar Project (20PR03687)

Supplemental Phase IB Research Design

EDR Project No: 19020

Dear Josalyn and Nancy,

Per our recent discussions, this memo summarizes EDR's proposed approach to completing a Supplemental Phase IB Archaeological Survey for the South Ripley Solar Project ("Project"). The Supplemental IB is being conducted in consideration of NYSOPRHP/NYSHPO's comments on the Phase IB Archaeological Survey Report and in order to address Project design changes that have resulted in revised limits of ground disturbance for the project.

EDR is proposing a revision to our archaeological sensitivity model for the Project, which is informed by the results of Phase IB survey conducted to date, improved environmental data for the site (i.e., delineated wetlands), consultation with NYSOPRHP/NYSHPO, and the NYSHPO's 2020 *Guidelines for Solar Facility Development Cultural Resources Survey Work* (hereafter, the NYSHPO Solar Guidelines).

As part of the Phase IA Archaeological Survey report (January 2021) for the Project, EDR proposed an archaeological sensitivity model that defined areas of high or elevated archaeological sensitivity to include:

- 1. Areas within 1,000 feet (305 m) of known archaeological sites (NYSOPRHP/NYSM Sites).
- 2. Areas within known NYSM Areas.

And Areas where 2 out of the 3 following environmental variables apply:

- 3. Areas within 1,500 feet (457 meters) of water, wetlands, or hydric soils.
- 4. Soils classified as moderately well drained, well drained, somewhat excessively drained, and excessively drained, according to ESRI and SSURGO (2020) soils mapping.
- 5. Ground slope of 5% or less.

Phase IB archaeological survey conducted to date for the Project consisted of shovel testing within areas where substantial proposed ground disturbance (per the NYSHPO Solar Guidelines)

overlapped with areas of high sensitivity (per the model above). The Phase IB survey resulted in the identification of 15 archaeological sites within the Facility Site. Of these 15 sites, 11 were located less than 328 feet (100 m) from water, consistent with the recommended environmental variables in the NYSHPO Solar Guidelines. Of the remaining 4 sites, 3 were isolated artifacts and the fourth consisted of 2 chert flakes from 2 shovel tests. None of these sites have been recommended to be NRHP-eligible. In addition, sites were identified in soils with drainage classes that included excessively drained, somewhat excessively drained, well drained, moderately well drained, and somewhat poorly drained. Based on these data and the NYSHPO Solar Guidelines, EDR refined the archaeological sensitivity model for the Facility Site – areas of elevated/high archaeological sensitivity per the revised model include [revisions to the model are in bold]:

- 1. Areas within 1,000 feet (305 m) of known archaeological sites (NYSOPRHP/NYSM Sites).
- 2. Areas within known NYSM Areas.
- 3. Areas within 328 feet (100 m) of delineated wetlands, streams, or hydric soils.
- 4. Soils classified as **somewhat poorly drained**, moderately well drained, well drained, somewhat excessively drained, and excessively drained, according to ESRI and SSURGO (2020) soils mapping.
- 5. Ground slope of 5% or less.

The attached Map shows the revised sensitivity model, limits of proposed substantial ground disturbance (per the revised project layout), areas tested during the prior Phase IB archaeological survey, and remaining areas to be tested in the Supplemental Phase IB survey. The remaining areas to be tested total approximately 110-115 acres.

EDR has initiated the Supplemental Phase IB Archaeological Survey consistent with the methods and research design (except as noted herein) previously presented in our Phase IA and Phase IB reports. The revised archaeological sensitivity model and rationale for revising the model (as summarized herein) will be described in the Supplemental Phase IB Archaeological Survey report.

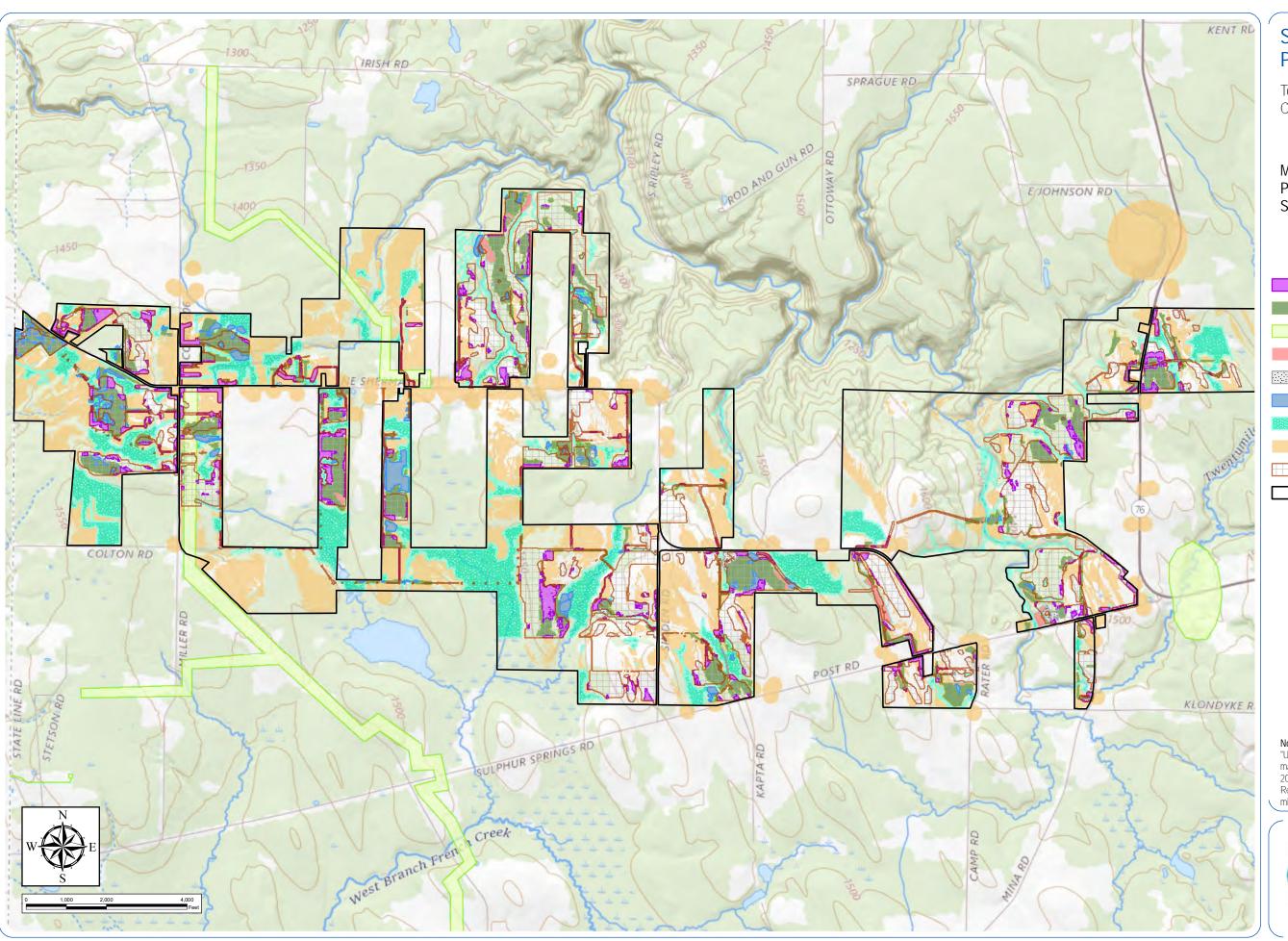
Please contact Patrick Heaton at pheaton@edrdpc.com or 315.471.0688x621 if you have any concerns or would like to further discuss the proposed approach for the Supplemental Phase IB Archaeological Survey.

Thank you,

Patrick Heaton

Principal, EDR

Attachment: Map 1. Supplemental Phase IB Archaeological Survey Research Design



South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

Map 1. Supplemental Phase IB Archaeological Survey Research Design

Remaining Survey Area

EDR 2020 Phase IB Shovel Tested Area

Previous Archaeological Survey

Field Identified Steep Slope

Field Identified Disturbance
Field Identified Inundated Terrain

Delineated Wetland/Stream

Archaeological Sensitive Area

Limits of Significant Soil Disturbance

Facility Site

Notes: 1. Basemap: ESRI ArcGIS Online
"USA Topo Maps" map service. 2. This
map was generated in ArcMap on June 9,
2021. 3. This is a color graphic.
Reproduction in grayscale may
misrepresent the data.





June 15, 2021

Bryan Printup Tuscarora Nation 5226 Walmore Road Lewiston, NY 14092 bprintup@hetf.org

RE: South Ripley Solar Project Cultural Resources Surveys EDR Project #19020

Dear Mr. Printup:

I am writing to provide the Tuscarora Nation with the cultural resources survey documents for the proposed South Ripley Solar Project in the Town of Ripley, Chautauqua County, New York (the Facility). ConnectGen Chautauqua County LLC (ConnectGen) is currently planning, designing, and conducting permitting studies for the Project (please see attached Maps 1 and 2). This letter includes a brief introduction about the proposed solar facility, a list of the cultural resources studies that are being prepared for the project, and a link to a SharePoint site where PDF copies of the cultural resources survey reports are available for review and comment by the Nation.

The Facility will consist of arrays of photovoltaic panels with a total generating capacity of up to 270 megawatts, and associated infrastructure including collection lines and access roads. The Facility would be built on leased, privately-owned land totaling approximately 2,400 acres (Facility Site; see Maps 1 and 2), consisting of active agricultural land, successional fields and/or forest, and cultivated tree farms. Not all the land included in the Facility Site will ultimately be included in the Facility. Rather, the Facility Site represents the extents of parcels upon which Facility components will be developed. This provides flexibility during Facility development to minimize and avoid impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive resources. At this time, it is anticipated that the total area occupied by project infrastructure will be approximately 1,500 acres.

ConnectGen is seeking a permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Section 94-c of the New York State Executive Law. Chapter XVIII Title 19 of NYCRR Part 900 establishes the procedural and substantive requirements for a Siting Permit Application under Section 94-c.

The Siting Permit Application prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. The environmental and permitting studies are being prepared on behalf of ConnectGen by Environmental Design & Research (EDR), an environmental consulting firm based in Syracuse, New York.

For your reference, ConnectGen's primary point of contact for the project is:

Isaac Phillips

Development Manager

Email: info@southripleysolar.com

Phone: (800) 338-8905

ConnectGen retained EDR to undertake cultural resources studies for the Facility. EDR has prepared the reports below:

- Phase IA Archaeological Survey
- Phase IA Historic Resources Survey Methodology
- Historic Resources Survey Report

In addition, EDR is also in the process of conducting a Phase IB archaeological survey for the Facility. The Phase IA archaeological survey and the historic resources methodology and survey are available as PDFs for review and comment on a SharePoint site at this link: <u>Cultural Resources Survey Reports</u>.

In addition to the cultural resources studies, upcoming anticipated project milestones will include the following:

- Siting Permit Application submitted to ORES (Summer 2021)
- U.S. Army Corps of Engineers Section 404 Clean Water Act permit coordination (Late 2021)

We look forward to working with you, and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at dpippin@edrdpc.com or (585) 752-6147, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688.

We are confident that the South Ripley Solar Project can be developed in a manner that is respectful of the Tuscarora Nation's heritage.

Thank you very much for your time.

Sincerely,

Douglas J Pippin, PhD, RPA

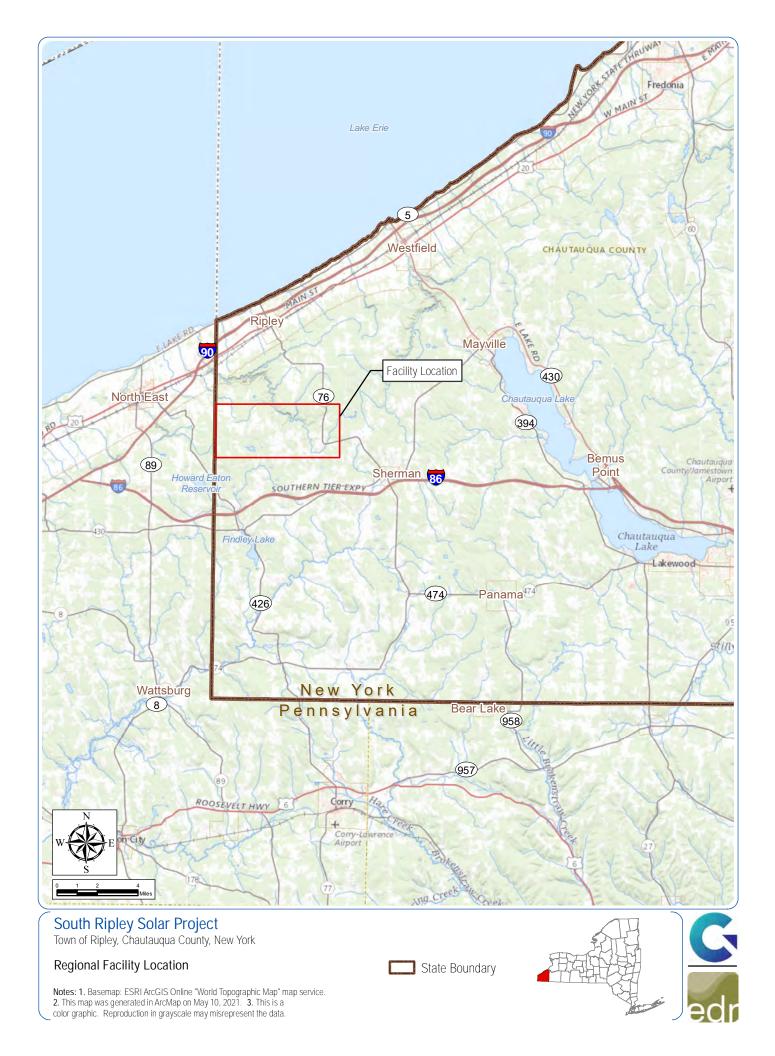
Dordles Pippon

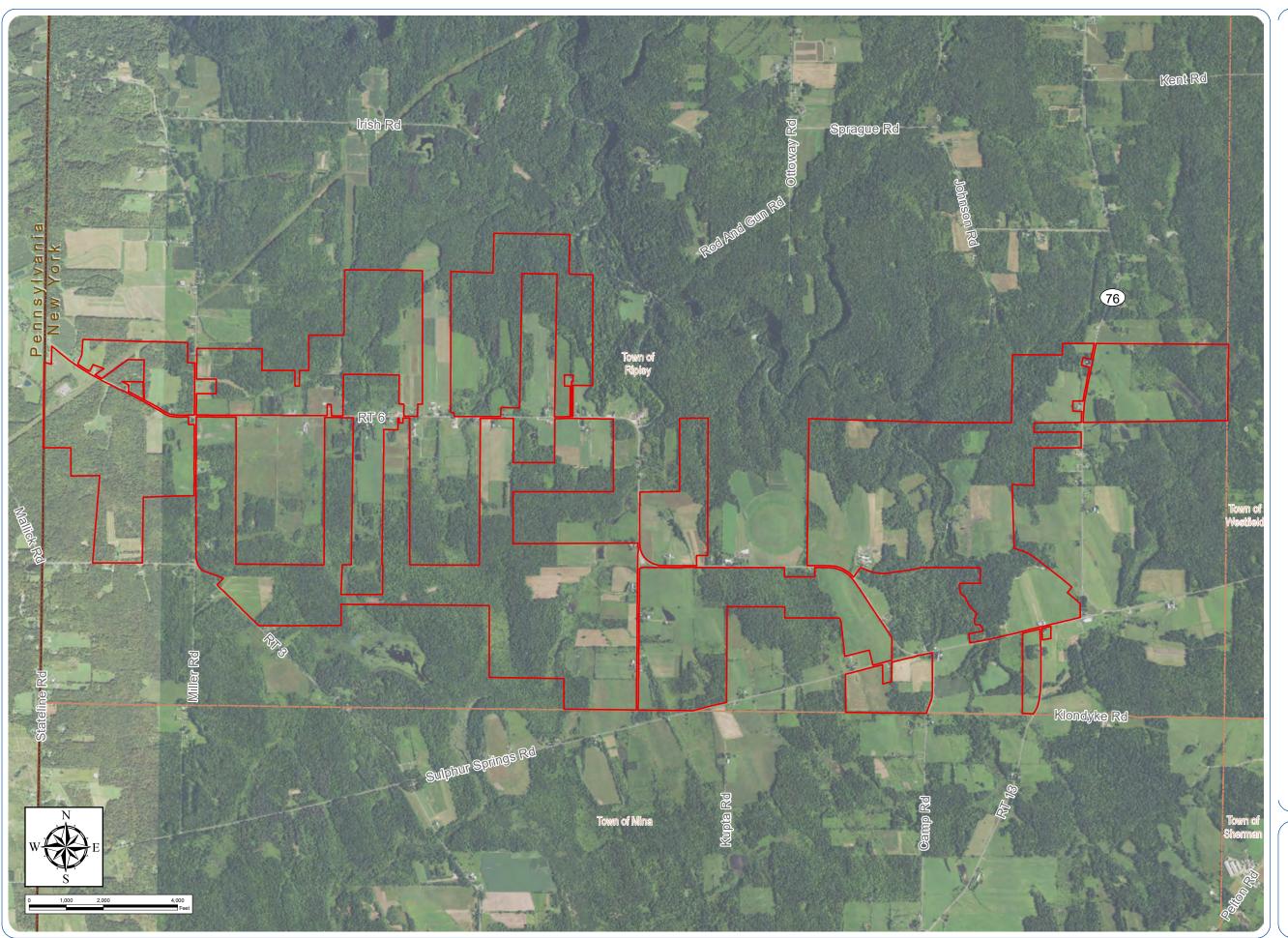
EDR Senior Project Manager, Archaeology

Attachments:

- Map 1. Regional Facility Location
- Map 2. Facility Site

- Nancy Herter, PhD, New York State Historic Preservation Office
- Josalyn Ferguson, PhD, New York State Historic Preservation Office





South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

Facility Site

Facility Site

Town Boundary

State Boundary

Notes: 1. Basemap: USDA NAIP "2019 New York 60cm" orthoimagery map service. 2. This map was generated in ArcMap on February 9, 2021. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.





June 15, 2021

Chief Roger Hill Tonawanda Seneca Nation 7027 Meadville Road Basom, NY 14013 tonseneca@aol.com

RE: South Ripley Solar Project Cultural Resources Surveys EDR Project #19020

Dear Chief Hill:

I am writing to provide the Tonawanda Seneca Nation with the cultural resources survey documents for the proposed South Ripley Solar Project in the Town of Ripley, Chautauqua County, New York (the Facility). ConnectGen Chautauqua County LLC (ConnectGen) is currently planning, designing, and conducting permitting studies for the Project (please see attached Maps 1 and 2). This letter includes a brief introduction about the proposed solar facility, a list of the cultural resources studies that are being prepared for the project, and a link to a SharePoint site where PDF copies of the cultural resources survey reports are available for review and comment by the Nation.

The Facility will consist of arrays of photovoltaic panels with a total generating capacity of up to 270 megawatts, and associated infrastructure including collection lines and access roads. The Facility would be built on leased, privately-owned land totaling approximately 2,400 acres (Facility Site; see Maps 1 and 2), consisting of active agricultural land, successional fields and/or forest, and cultivated tree farms. Not all the land included in the Facility Site will ultimately be included in the Facility. Rather, the Facility Site represents the extents of parcels upon which Facility components will be developed. This provides flexibility during Facility development to minimize and avoid impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive resources. At this time, it is anticipated that the total area occupied by project infrastructure will be approximately 1,500 acres.

ConnectGen is seeking a permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities under Section 94-c of the New York State Executive Law. Chapter XVIII Title 19 of NYCRR Part 900 establishes the procedural and substantive requirements for a Siting Permit Application under Section 94-c.

The Siting Permit Application prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. The environmental and permitting studies are being prepared on behalf of ConnectGen by Environmental Design & Research (EDR), an environmental consulting firm based in Syracuse, New York.

For your reference, ConnectGen's primary point of contact for the project is:

Isaac Phillips

Development Manager

Email: info@southripleysolar.com

Phone: (800) 338-8905

ConnectGen retained EDR to undertake cultural resources studies for the Facility. EDR has prepared the reports below:

- Phase IA Archaeological Survey
- Phase IA Historic Resources Survey Methodology
- Historic Resources Survey Report

In addition, EDR is also in the process of conducting a Phase IB archaeological survey for the Facility. The Phase IA archaeological survey and the historic resources methodology and survey are available as PDFs for review and comment on a SharePoint site at this link: <u>Cultural Resources Survey Reports</u>.

In addition to the cultural resources studies, upcoming anticipated project milestones will include the following:

- Siting Permit Application submitted to ORES (Summer 2021)
- U.S. Army Corps of Engineers Section 404 Clean Water Act permit coordination (Late 2021)

We look forward to working with you, and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at dpippin@edrdpc.com or (585) 752-6147, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688.

We are confident that the South Ripley Solar Project can be developed in a manner that is respectful of the Tonawanda Seneca Nation's heritage.

Thank you very much for your time.

Sincerely,

Douglas J Pippin, PhD, RPA

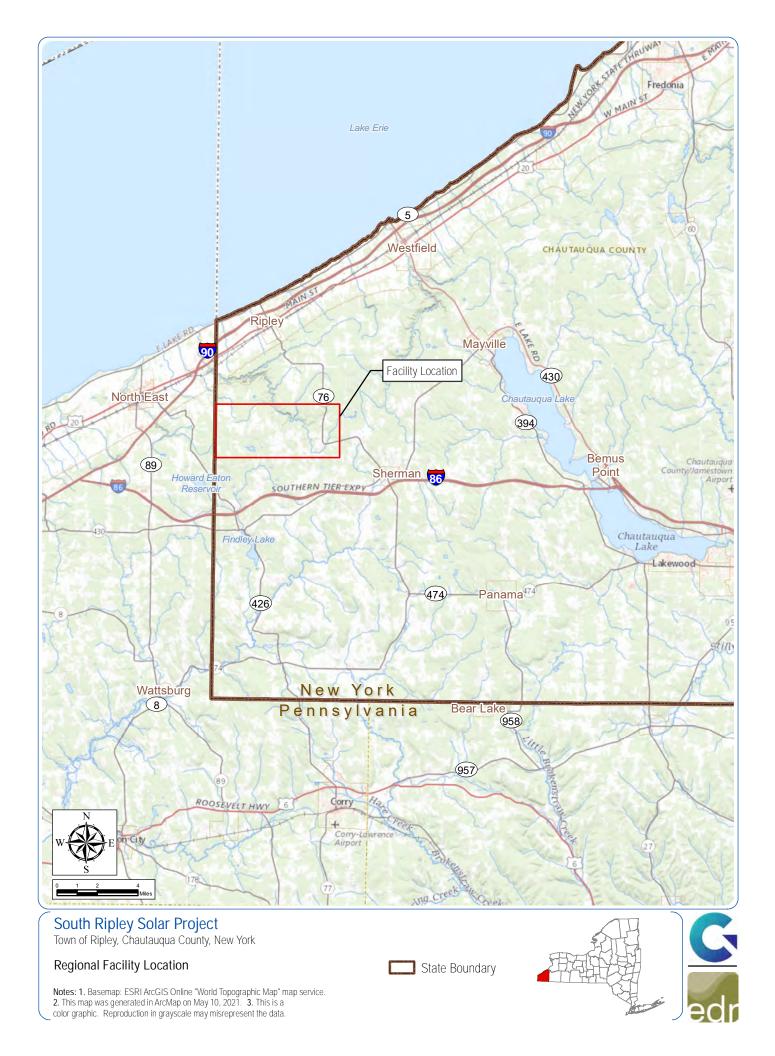
Dordles Pippon

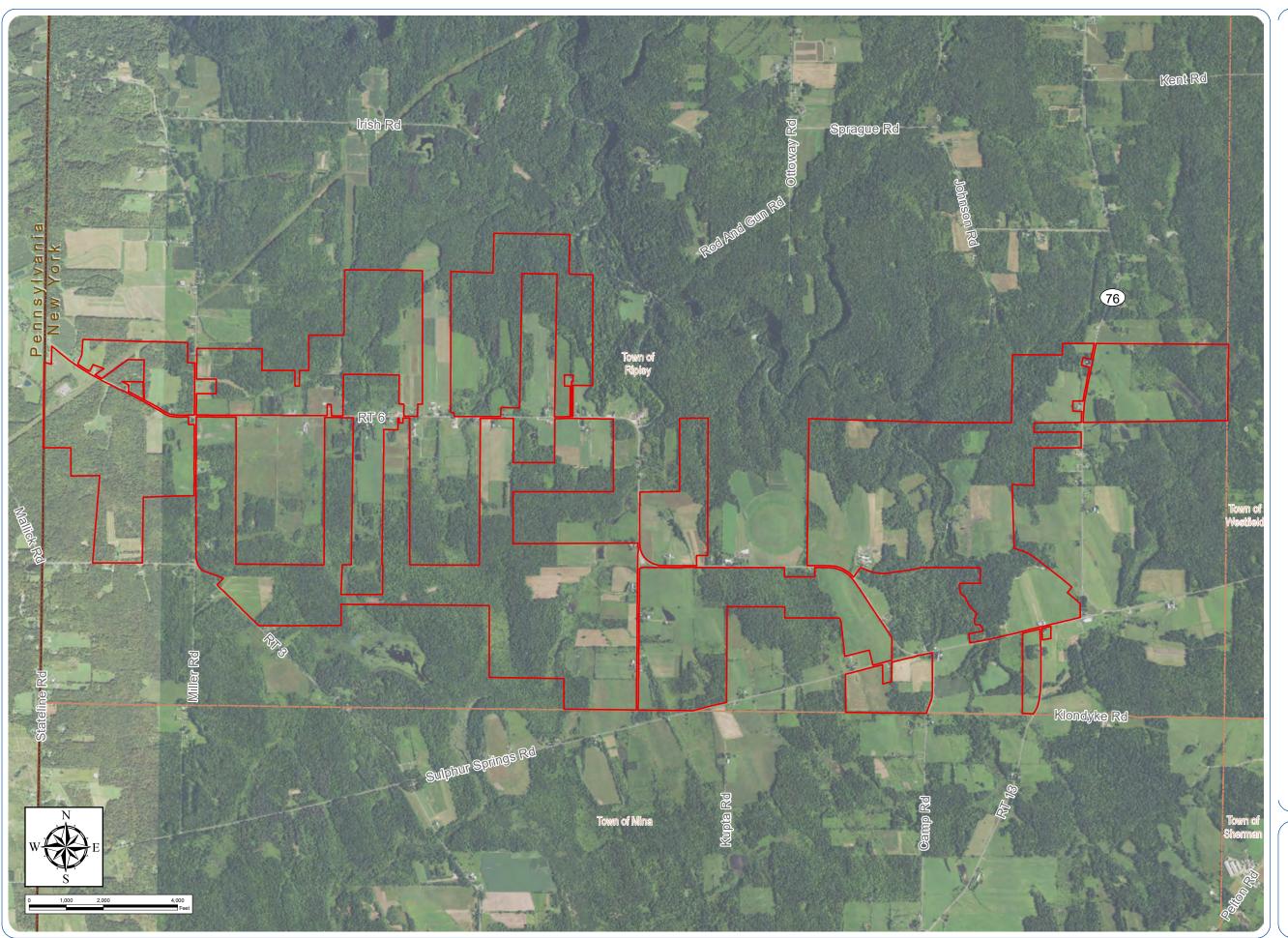
EDR Senior Project Manager, Archaeology

Attachments:

- Map 1. Regional Facility Location
- Map 2. Facility Site

- Christine Abrams, Tonawanda Seneca Nation
- Alex Page, Berkey Williams
- Nancy Herter, PhD, New York State Historic Preservation Office
- Josalyn Ferguson, PhD, New York State Historic Preservation Office





South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

Facility Site

Facility Site

Town Boundary

State Boundary

Notes: 1. Basemap: USDA NAIP "2019 New York 60cm" orthoimagery map service. 2. This map was generated in ArcMap on February 9, 2021. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.





June 15, 2021

Dr. Joe Stahlman, Director Seneca-Iroquois National Museum Seneca Nation of Indians joe.stahlman@sni.org

RE: South Ripley Solar Project Cultural Resources Surveys EDR Project #19020

Dear Dr. Stahlman:

I am writing to provide the Seneca Nation of Indians with the cultural resources survey documents for the proposed South Ripley Solar Project in the Town of Ripley, Chautauqua County, New York (the Facility). ConnectGen Chautauqua County LLC (ConnectGen) is currently planning, designing, and conducting permitting studies for the Project (please see attached Maps 1 and 2). This letter includes a brief introduction about the proposed solar facility, a list of the cultural resources studies that are being prepared for the project, and a link to a SharePoint site where PDF copies of the cultural resources survey reports are available for review and comment by the Nation.

The Facility will consist of arrays of photovoltaic panels with a total generating capacity of up to 270 megawatts, and associated infrastructure including collection lines and access roads. The Facility would be built on leased, privately-owned land totaling approximately 2,400 acres (Facility Site; see Maps 1 and 2), consisting of active agricultural land, successional fields and/or forest, and cultivated tree farms. Not all the land included in the Facility Site will ultimately be included in the Facility. Rather, the Facility Site represents the extents of parcels upon which Facility components will be developed. This provides flexibility during Facility development to minimize and avoid impacts to cultural resources, visual resources, wetlands, wildlife habitat, and other sensitive resources. At this time, it is anticipated that the total area occupied by project infrastructure will be approximately 1,500 acres.

ConnectGen is seeking a permit to construct the Facility from New York State through the Office of Renewable Energy Siting (ORES), which issues permits for major renewable energy facilities

under Section 94-c of the New York State Executive Law. Chapter XVIII Title 19 of NYCRR Part 900 establishes the procedural and substantive requirements for a Siting Permit Application under Section 94-c.

The Siting Permit Application prepared for the Facility will include engineering plans and the results of various environmental and cultural resources studies. The environmental and permitting studies are being prepared on behalf of ConnectGen by Environmental Design & Research (EDR), an environmental consulting firm based in Syracuse, New York.

For your reference, ConnectGen's primary point of contact for the project is:

Isaac Phillips

Development Manager

Email: info@southripleysolar.com

Phone: (800) 338-8905

ConnectGen retained EDR to undertake cultural resources studies for the Facility. EDR has prepared the reports below:

- Phase IA Archaeological Survey
- Phase IA Historic Resources Survey Methodology
- Historic Resources Survey Report

In addition, EDR is also in the process of conducting a Phase IB archaeological survey for the Facility. The Phase IA archaeological survey and the historic resources methodology and survey are available as PDFs for review and comment on a SharePoint site at this link: <u>Cultural Resources Survey Reports</u>.

In addition to the cultural resources studies, upcoming anticipated project milestones will include the following:

- Siting Permit Application submitted to ORES (Summer 2021)
- U.S. Army Corps of Engineers Section 404 Clean Water Act permit coordination (Late 2021)

We look forward to working with you, and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at dpippin@edrdpc.com or (585) 752-6147, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688.

We are confident that the South Ripley Solar Project can be developed in a manner that is respectful of the Seneca Nation of Indians' heritage.

Thank you very much for your time.

Sincerely,

Douglas J Pippin, PhD, RPA

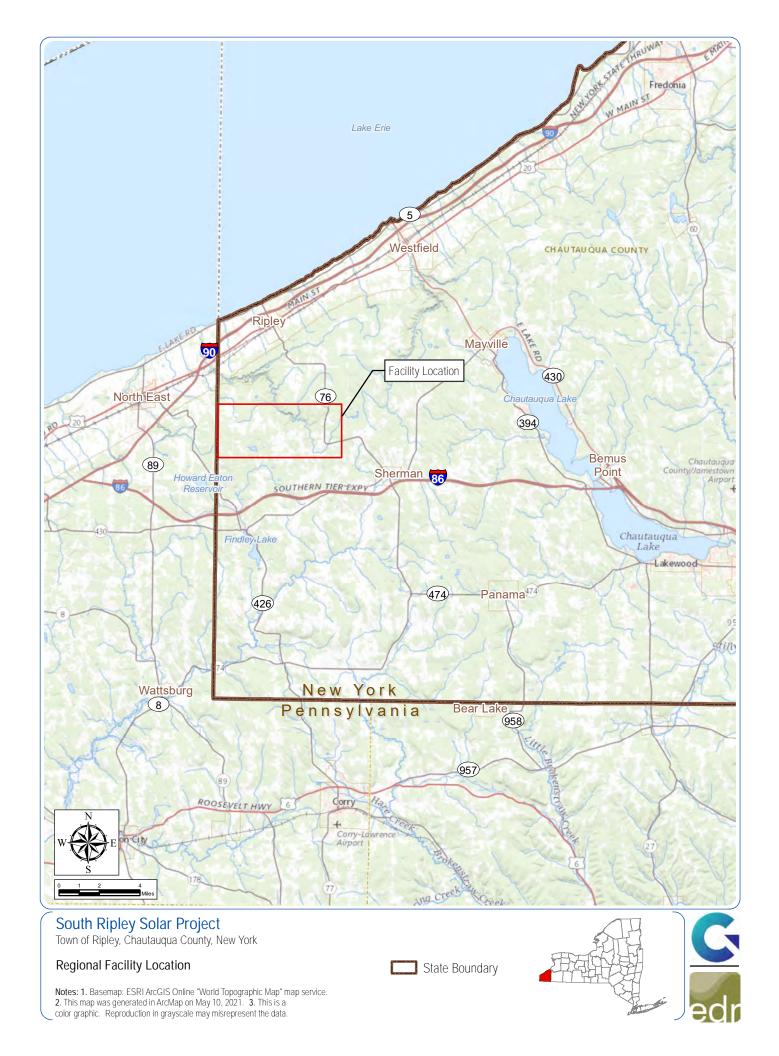
Dordas Pippon

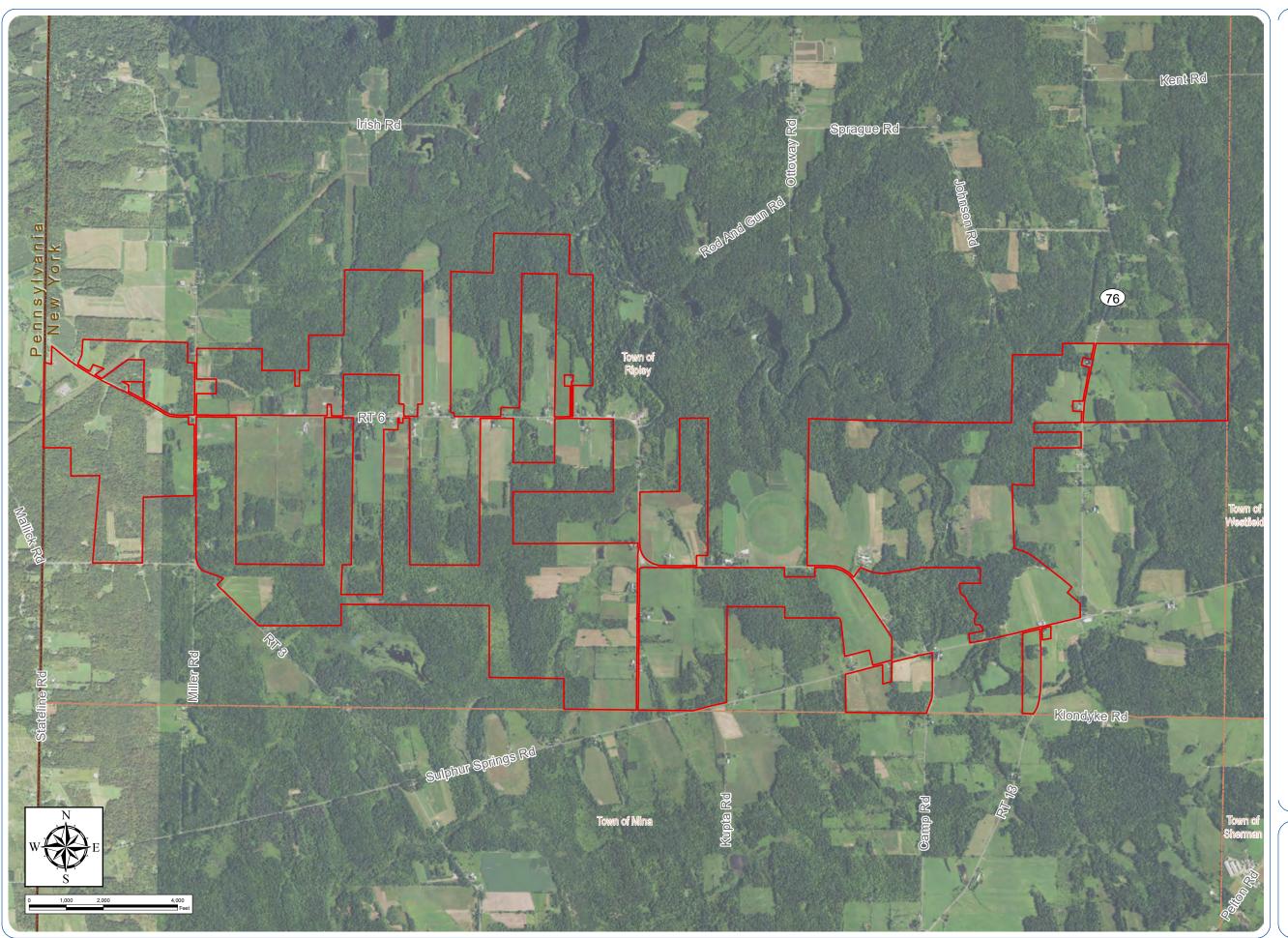
EDR Senior Project Manager, Archaeology

Attachments:

- Map 1. Regional Facility Location
- Map 2. Facility Site

- President Matthew Pagels, Seneca Nation of Indians
- Nancy Herter, PhD, New York State Historic Preservation Office
- Josalyn Ferguson, PhD, New York State Historic Preservation Office





South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

Facility Site

Facility Site

Town Boundary

State Boundary

Notes: 1. Basemap: USDA NAIP "2019 New York 60cm" orthoimagery map service. 2. This map was generated in ArcMap on February 9, 2021. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.



From: Doug Pippin
To: Joe Stahlman

Subject: RE: External: South Ripley Solar - Project Introduction

Date: Wednesday, June 23, 2021 4:55:00 PM

Joe,

Thank you for the message, we are pleased to discuss the project with you. EDR is conducting the Phase IB archaeological survey.

Please let me know if you wish to set up a call.

Best regards,

Doug

Douglas J Pippin, PhD, RPA

EDR Senior Project Manager, Archaeology

From: Joe Stahlman < Joe.Stahlman@sni.org> **Sent:** Wednesday, June 23, 2021 3:13 PM **To:** Doug Pippin < DPippin@edrdpc.com>

Subject: RE: External: South Ripley Solar - Project Introduction

[EXTERNAL SENDER]

Dear Mr. Pippin,

Seneca Nation is interested in consulting on this endeavor. We have already began those discussions with NYS SHPO. Who is doing the 1B survey?

Thank you,

Joe

From: Doug Pippin [mailto:DPippin@edrdpc.com]

Sent: Tuesday, June 15, 2021 4:02 PM **To:** Joe Stahlman < <u>Joe.Stahlman@sni.org</u>>

Cc: Isaac Phillips <iphillips@connectgenllc.com>; John Kuba <jkuba@connectgenllc.com>; Pat Heaton <<u>PHeaton@edrdpc.com</u>>; William Whipps <<u>wwhipps@edrdpc.com</u>>; Herter, Nancy (PARKS) <<u>Nancy.Herter@parks.ny.gov</u>>; Ferguson, Josalyn (PARKS) <<u>Josalyn.Ferguson@parks.ny.gov</u>>

Subject: External: South Ripley Solar - Project Introduction

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Dr. Stahlman,

On behalf of ConnectGen Chautauqua County LLC, I am writing to provide you information on the South Ripley Solar Project, located in the Town of South Ripley, New York. We are aware that the Facility is located within ancestral Seneca territory and would like to initiate a dialog with the Seneca Nation of Indians regarding potential archaeological sites, historic properties, or other sensitive areas of concern. In addition to this email and attached letter, we are sending a hardcopy of the letter to your mailing address as well. We hope to set up a meeting or call to formally introduce the project to you and the Nation.

The attached letter has a link to a site where you can access the cultural resources studies completed by EDR to date, including the Phase IA archaeological survey. In addition, our field team has initiated a Phase IB archaeological survey fieldwork for the project.

If you are available for an opportunity to discuss this project in greater detail, please let me know. We look forward to the speaking with you.

Thank you for your time,

Doug Pippin

Douglas J Pippin, PhD, RPA

EDR Senior Project Manager, Archaeology 274 North Goodman Street, Suite B260, Rochester, New York 14607 **O**: 585.271.0040 x212 **M**: 585.752.6147 **www.edrdpc.com**

EDR a **better** environment

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please delete this message. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email. https://www.sni.org



July 28, 2021

Bryan Printup Tuscarora Nation 5226 Walmore Road Lewiston, NY 14092 bprintup@hetf.org

RE: South Ripley Solar Project Cultural Resources Surveys EDR Project #19020

Dear Mr. Printup:

On behalf of ConnectGen Chautauqua County LLC (ConnectGen), I am writing to provide the Tuscarora Nation with additional cultural resources survey documents for the proposed South Ripley Solar Project in the Town of Ripley, Chautauqua County, New York (the Facility). This letter serves as a follow-up to the June 15th, 2021 project introduction letter sent to your attention and includes an updated list of cultural resource studies that have been prepared for the project, and a link to a SharePoint site where PDF copies of the cultural resources survey reports are available for review and comment by the Nation.

For your reference, ConnectGen's primary point of contact for the project is:

Isaac Phillips
Development Manager

Email: info@southripleysolar.com

Phone: (800) 338-8905

Cultural resources studies for the Project have been prepared on behalf of ConnectGen by Environmental Design & Research (EDR). In addition to the reports previously provided in our June 15, 2021, correspondence, EDR has posted copies of the following additional cultural resources survey reports to the SharePoint link below:

- Phase IB Archaeological Survey
- Supplemental Phase IB Archaeological Survey

The cultural resource survey reports listed above are available as PDFs for review and comment on a SharePoint site at this link: <u>Cultural Resources Survey Reports</u>.

In addition to the cultural resources studies, upcoming anticipated project milestones will include the following:

- Siting Permit Application submitted to ORES (Summer 2021)
- U.S. Army Corps of Engineers Section 404 Clean Water Act permit coordination (Late 2021)

We look forward to working with you, and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at dpippin@edrdpc.com or (585) 752-6147, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688.

We are confident that the South Ripley Solar Project can be developed in a manner that is respectful of the Tuscarora Nation's heritage.

Thank you very much for your time.

Sincerely,

Douglas J Pippin, PhD, RPA

Dorda Pippon

EDR Senior Project Manager, Archaeology

- Nancy Herter, PhD, New York State Historic Preservation Office
- Josalyn Ferguson, PhD, New York State Historic Preservation Office



July 28, 2021

Chief Roger Hill Tonawanda Seneca Nation 7027 Meadville Road Basom, NY 14013 tonseneca@aol.com

RE: South Ripley Solar Project Cultural Resources Surveys EDR Project #19020

Dear Chief Hill:

On behalf of ConnectGen Chautauqua County LLC (ConnectGen), I am writing to provide the Tonawanda Seneca Nation with additional cultural resources survey documents for the proposed South Ripley Solar Project in the Town of Ripley, Chautauqua County, New York (the Facility). This letter serves as a follow-up to the June 15th, 2021 project introduction letter sent to your attention and includes an updated list of cultural resource studies that have been prepared for the project, and a link to a SharePoint site where PDF copies of the cultural resources survey reports are available for review and comment by the Nation.

For your reference, ConnectGen's primary point of contact for the project is:

Isaac Phillips

Development Manager

Email: info@southripleysolar.com

Phone: (800) 338-8905

Cultural resources studies for the Project have been prepared on behalf of ConnectGen by Environmental Design & Research (EDR). In addition to the reports previously provided in our June 15, 2021, correspondence, EDR has posted copies of the following additional cultural resources survey reports to the SharePoint link below:

- Phase IB Archaeological Survey
- Supplemental Phase IB Archaeological Survey

The cultural resource survey reports listed above are available as PDFs for review and comment on a SharePoint site at this link: <u>Cultural Resources Survey Reports</u>.

In addition to the cultural resources studies, upcoming anticipated project milestones will include the following:

- Siting Permit Application submitted to ORES (Summer 2021)
- U.S. Army Corps of Engineers Section 404 Clean Water Act permit coordination (Late 2021)

We look forward to working with you, and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at dpippin@edrdpc.com or (585) 752-6147, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688.

We are confident that the South Ripley Solar Project can be developed in a manner that is respectful of the Tonawanda Seneca Nation's heritage.

Thank you very much for your time.

Sincerely,

Douglas J Pippin, PhD, RPA

Dorda Pippon

EDR Senior Project Manager, Archaeology

- Christine Abrams, Tonawanda Seneca Nation
- Alex Page, Berkey Williams
- Nancy Herter, PhD, New York State Historic Preservation Office
- Josalyn Ferguson, PhD, New York State Historic Preservation Office



July 28, 2021

Dr. Joe Stahlman, Director Seneca-Iroquois National Museum Seneca Nation of Indians joe.stahlman@sni.org

RE: South Ripley Solar Project Cultural Resources Surveys EDR Project #19020

Dear Dr. Stahlman:

On behalf of ConnectGen Chautauqua County LLC (ConnectGen), I am writing to provide the Seneca Nation of Indians with additional cultural resources survey documents for the proposed South Ripley Solar Project in the Town of Ripley, Chautauqua County, New York (the Facility). This letter serves as a follow-up to the June 15th, 2021 project introduction letter sent to your attention and includes an updated list of cultural resource studies that have been prepared for the project, and a link to a SharePoint site where PDF copies of the cultural resources survey reports are available for review and comment by the Nation.

For your reference, ConnectGen's primary point of contact for the project is:

Isaac Phillips
Development Manager

Email: info@southripleysolar.com

Phone: (800) 338-8905

Cultural resources studies for the Project have been prepared on behalf of ConnectGen by Environmental Design & Research (EDR). In addition to the reports previously provided in our June 15, 2021, correspondence, EDR has posted copies of the following additional cultural resources survey reports to the SharePoint link below:

- Phase IB Archaeological Survey
- Supplemental Phase IB Archaeological Survey

The cultural resource survey reports listed above are available as PDFs for review and comment on a SharePoint site at this link: <u>Cultural Resources Survey Reports</u>.

In addition to the cultural resources studies, upcoming anticipated project milestones will include the following:

- Siting Permit Application submitted to ORES (Summer 2021)
- U.S. Army Corps of Engineers Section 404 Clean Water Act permit coordination (Late 2021)

We look forward to working with you, and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at dpippin@edrdpc.com or (585) 752-6147, or Patrick Heaton at pheaton@edrdpc.com or (315) 471-0688.

We are confident that the South Ripley Solar Project can be developed in a manner that is respectful of the Seneca Nation of Indians' heritage.

Thank you very much for your time.

Sincerely,

Douglas J Pippin, PhD, RPA

Dorda Pippon

EDR Senior Project Manager, Archaeology

- President Matthew Pagels, Seneca Nation of Indians
- Nancy Herter, PhD, New York State Historic Preservation Office
- Josalyn Ferguson, PhD, New York State Historic Preservation Office

From: New York State Parks CRIS Application

To: <u>Grant Johnson; Doug Pippin; Kristen Olson; William Whipps; John Kuba; Isaac Phillips; Derek Rieman;</u>

joe.stahlman@sni.org; alex.c.page@gmail.com; Moaveni, Houtan (ORES); Justin Sabino; tonseneca@aol.com;

bprintup@hetf.org; Pat Heaton; jasmine.matley@dps.ny.gov; Daniel.Mackay@parks.ny.gov

Subject: SHPO Requested Submission Accepted for Consultation Project: 20PR03687

Date: Thursday, July 29, 2021 3:14:17 PM

[EXTERNAL SENDER]

This message is a notification from the New York State Historic Preservation Office (SHPO) through its Cultural Resource Information System (CRIS). Requested submission TY7HFPAEQN97 has been accepted for project 20PR03687 (South Ripley Solar Project/270 MW/2000 acres / Siting Board Case 19-F-0560). Its new submission number is 20PR03687.012.

No action on your part is required at this time. SHPO review of the submission is currently in progress, and you will receive updates by email.

This submission was completed for the following SHPO request in response to project submission 20PR03687.009 (response token QC5GHPFVAUHX): Please see the attached letter and have the requested Addendum Phase IB survey conducted by a 36CFR61 qualified archaeologist. Please submit the Addendum Ph. IB report to our office, along with a zipped polygon shapefile of the Addendum Ph. IB's survey area, using the enclosed CRIS survey token.

If you have any questions about CRIS, please contact CRIS Help at 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

Are you registered to vote? Register to vote online today. Moved recently? Update your information with the NYS Board of Elections. Not sure if you're registered to vote? Search your voter registration status.

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 access the project in CRIS at https://cris.parks.ny.gov/. If you are a registered CRIS user, the project will appear in the **My Projects** tab on your Home dashboard. If you are a guest user, you may view the project details using the **Find My Project** form on the CRIS Home page after you click **Proceed as Guest**, or by entering the submission token (TY7HFPAEQN97) in the Lookup tab on the Search page.