

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

*Revised January 2022*

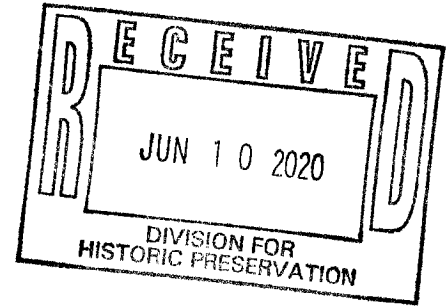
<b>Date</b>	<b>Sender</b>	<b>Recipient</b>	<b>Content</b>
06.10.2020	ConnectGen	NYSHPO/OPRHP	Notification to stakeholders of PSS submission (sent by mail, received 06.10.2020, uploaded 07.08.20)
06.18.2020	EDR/ConnectGen	NYSHPO/OPRHP	Initial Consultation Request and Visual Outreach Letter
06.22.2020	NYSHPO/OPRHP	EDR/ConnectGen	Request for Historic Resource Survey Methodology
06.24.2020	NYSHPO/OPRHP	Tonawanda Nation Seneca Nation Tuscarora Nation	Project Introduction via email
06.24.2020	NYSHPO/OPRHP	EDR/ConnectGen	Request for Phase IA Archaeological Sensitivity Assessment and Phase IB Scope of Work
08.17.2020	EDR/ConnectGen	NYSHPO/OPRHP	Submission of Phase IA Historic Resources to SHPO via CRIS
08.19.2020	NYSHPO/OPRHP	EDR/ConnectGen	NYSHPO/CRIS receipt of submission of Phase IA Historic Resources Survey Methodology
11.17.2020	EDR/Connect Gen	NYSHPO/OPRHP	Recommended Viewpoints Letter to Stakeholders (sent by mail, received 11.17.2020, uploaded 11.24.20)
01.22.2021	EDR/ConnectGen	NYSHPO/OPRHP	Submission of the Phase IA Archaeology Survey to SHPO via CRIS
01.22.2021	NYSHPO/OPRHP	EDR/ConnectGen	NYSHPO/CRIS receipt of submission of Phase IA Archaeology Survey
02.08.2021	NYSHPO/OPRHP	ORES	Concurrence with Phase IA Archaeological Survey and Phase IB Survey Recommendation
02.22.2021	EDR/ConnectGen	NYSHPO/OPRHP	Submission of the Historic Resources Survey Report to SHPO via CRIS
02.22.2021	NYSHPO/OPRHP	EDR/ConnectGen	NYSHPO/CRIS receipt of submission of Historic Resources Survey Report
02.26.2021	NYSHPO/OPRHP	N/A	Determinations of State and National Register of Historic

Date	Sender	Recipient	Content
			Places (S/NRHP) eligibility for surveyed historic resources
03.19.2021	NYSHPO/OPRHP	ORES	Response to Historic Resources Survey Report
04.27.2021	EDR/ConnectGen	NYSHPO/OPRHP	Submission of the Phase IB Archaeological Survey Report to SHPO via CRIS
05.26.2021	NYSHPO/OPRHP	ORES	Review of Phase IB Archaeological Survey/Request for Phase IB Addendum
06.08.2021	EDR/ConnectGen	NYSHPO/OPRHP	Submission of Phase IB Revised Scope
06.10.2021	NYSHPO/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 Stahlman	EDR	Response to Cultural Resource Survey Overview
07.26.2021	EDR/ConnectGen	NYSHPO/OPRHP	Submission of the Phase IB Addendum Survey to SHPO via CRIS
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	NYSHPO/OPRHP	EDR/ConnectGen	NYSHPO/CRIS receipt of submission of Phase IB Addendum Survey
08.10.2021	NYSHPO/OPRHP	EDR/ConnectGen	Information request for Visual Impact Assessment
08.12.2021	EDR/ConnectGen	NYSHPO/OPRHP	Submission of the Visual Impact Analysis and links to the complete 94-c Siting Permit Application to SHPO via CRIS
08.20.2021	NYSHPO/OPRHP	EDR/ConnectGen	Request for additional Phase IB and Phase IB Addendum Archaeological Survey figures
09.02.2021	EDR/ConnectGen	NYSHPO/OPRHP	Submission of additional Phase IB and IB Addendum Archaeological Survey figures
09.13.2021	NYSHPO/OPRHP	EDR/ConnectGen	Request for phone conversation to clarify vegetative buffer locations

<b>Date</b>	<b>Sender</b>	<b>Recipient</b>	<b>Content</b>
09.16.2021	NYSHPO/OPRHP	EDR/ConnectGen	Information request for solar panel visibility relative to a S/NRHP-eligible resource
09.17.2021	EDR/ConnectGen	NYSHPO/OPRHP	Memorandum addressing visibility and visual impact to historic resources
09.21.2021	NYSHPO/OPRHP	ORES/EDR/ConnectGen	Determinations of S/NRHP eligibility and finding of no impact to archaeological resources
10.16.2021	NYSHPO/OPRHP	ORES/EDR/ConnectGen	Finding of no adverse impact to historic resources
11.18.2021	EDR/ConnectGen	NYSHPO/OPRHP	Memorandum detailing the POI Layout redesign
12.10.2021	EDR/ConnectGen	NYSHPO/OPRHP	Revised memorandum detailing the POI Layout redesign
01.11.2022	NYSHPO/OPRHP	ORES/EDR/ConnectGen	Finding of no adverse impact of the Facility Layout change to historic or archaeological resources



**South Ripley**  
SOLAR PROJECT



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](http://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





**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](http://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.<sup>1</sup>

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<sup>1</sup> 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, 2019<sup>2</sup>; following receipt of comments from the New York State Department of Public Service (DPS) staff, a Final PIP was filed on October 30, 2019.<sup>3</sup> The Preliminary Scoping Statement (PSS) for the South Ripley Solar Project was submitted to NYSDPS on May 22, 2020.<sup>4</sup> 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

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

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

<sup>4</sup> Available at: <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={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*<sup>5</sup> 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

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<sup>5</sup> 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 resources<sup>6</sup>**
- 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*<sup>7</sup> 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).<sup>8</sup>

#### 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.

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

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

<sup>8</sup> 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 survey<sup>9</sup>
- 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*.<sup>10</sup>

#### 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](mailto: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.

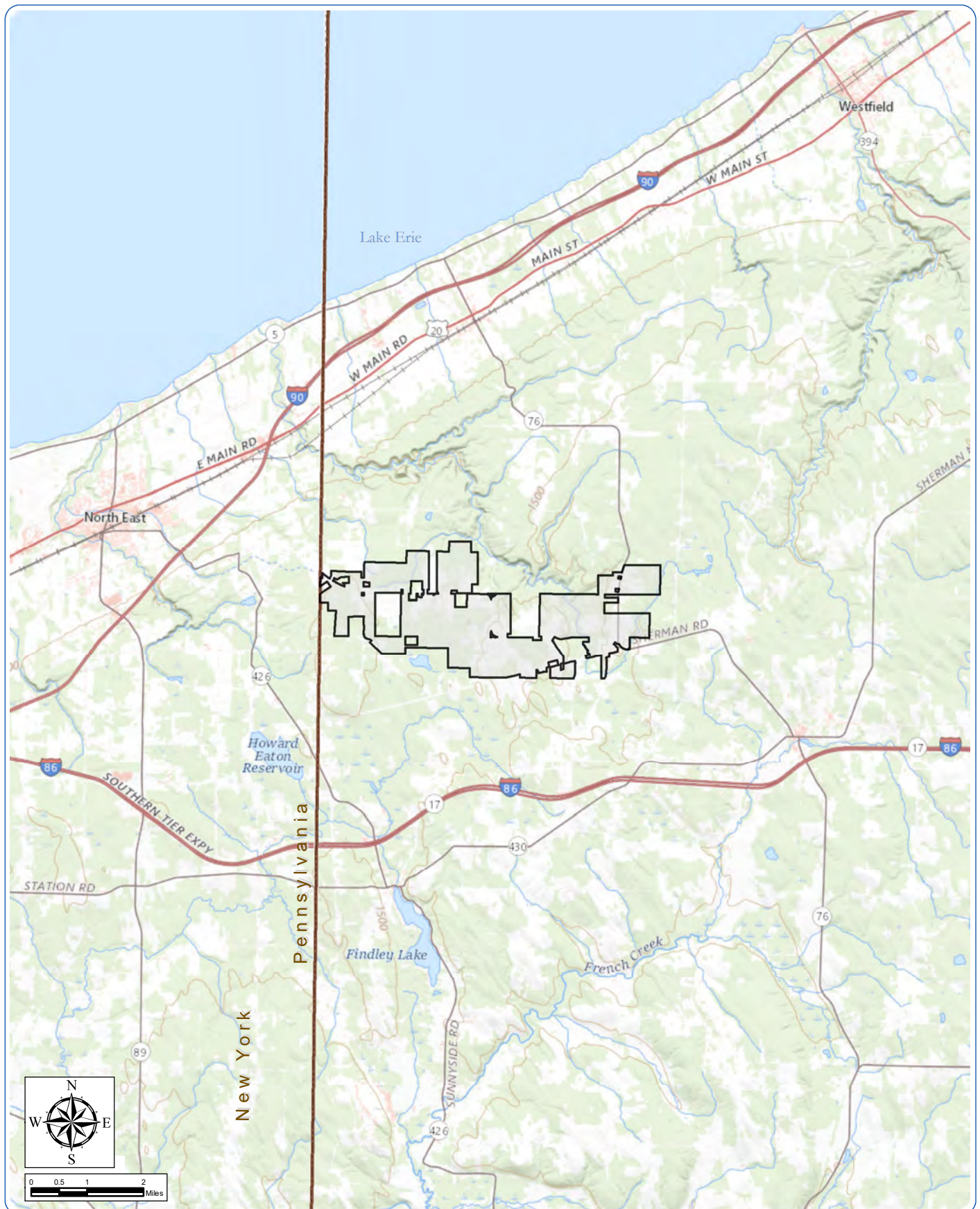
#### Attachments:

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

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<sup>9</sup>. 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.








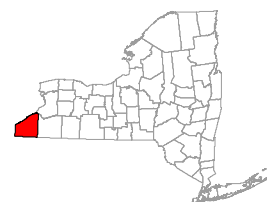
## South Ripley Solar Project

Town of Ripley, Chautauqua County, New York  
Case No. 19-F-0560

Figure 1: Facility Location

Notes: 1. Basemap: ESRI ArcGIS Online "USGS Topo" 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.

-  Facility Area
-  Town Boundary
-  State Boundary





# South Ripley Solar Project

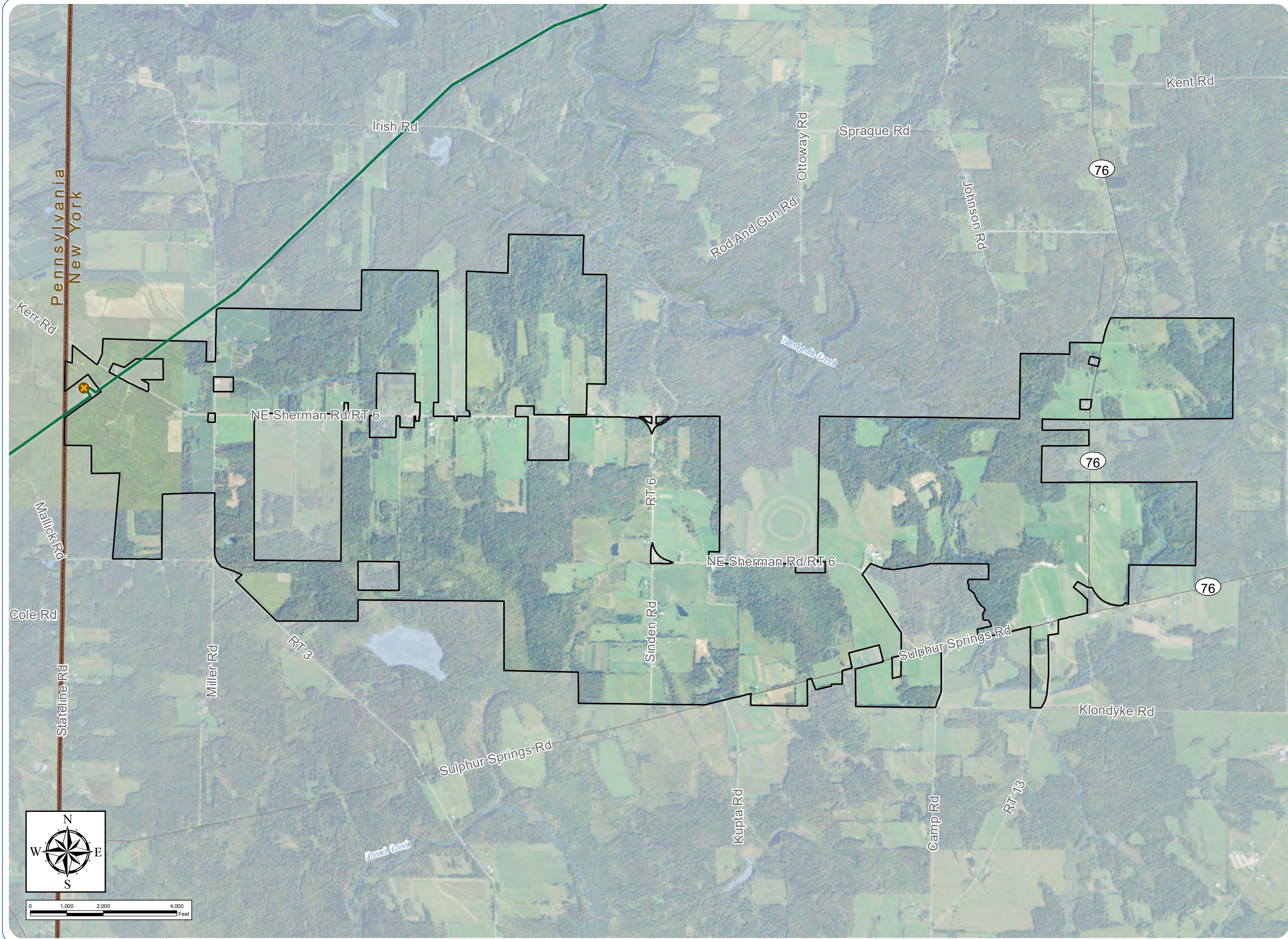
Town of Ripley, Chautauqua County, New York

Case No. 19-F-0560

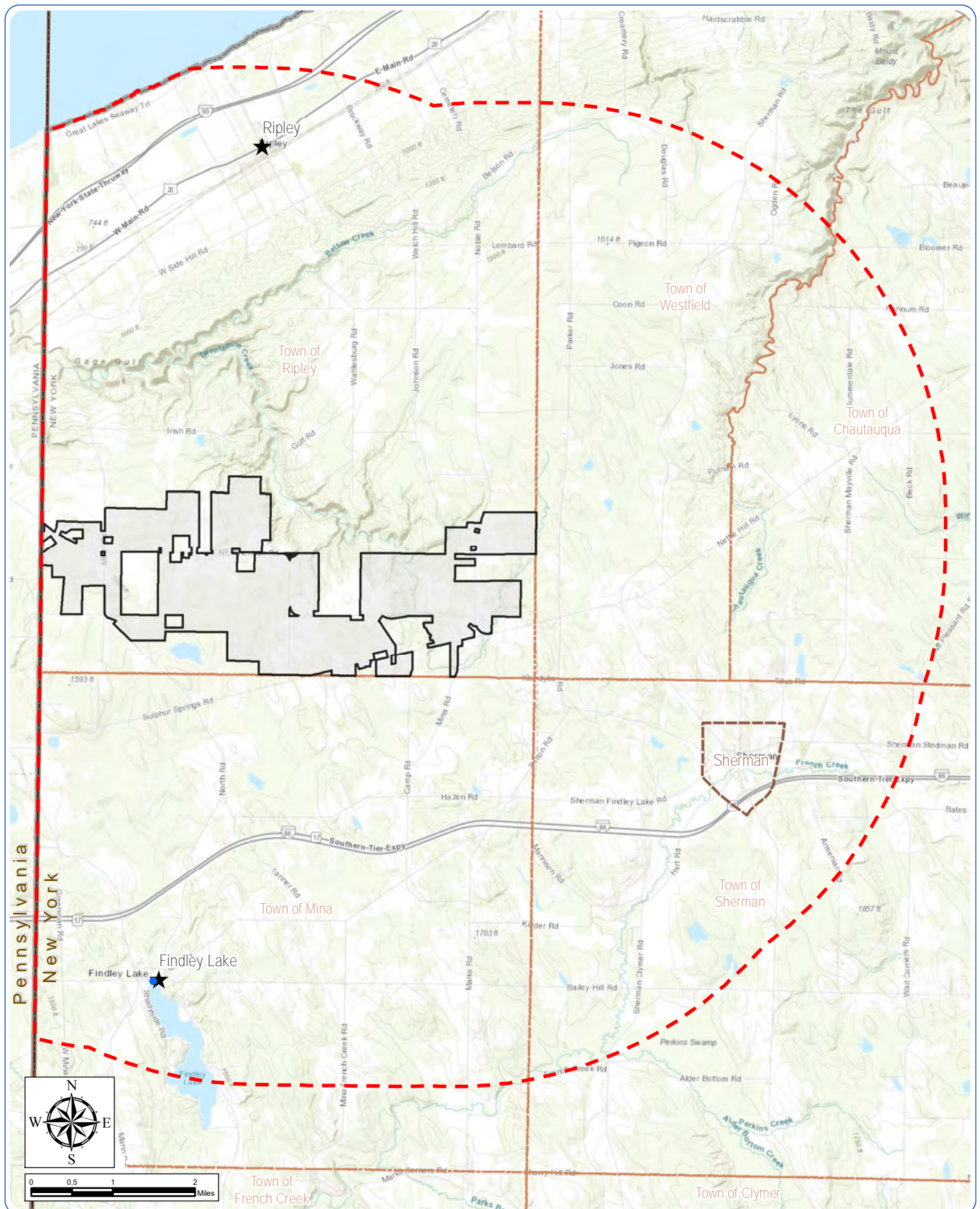
Figure 2: Facility Area

- 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.







## South Ripley Solar Project

Town of Ripley, Chautauqua County, New York  
Case No. 19-F-0560

Figure 3: Historic Resources Study Area

Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service. 2. This map was generated in ArcMap on June 11, 2020. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Facility Area
- 5-Mile Study Area
- State Boundary





**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 [Jennifer.walkowski@parks.ny.gov](mailto:Jennifer.walkowski@parks.ny.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "JWalkowski". The signature is fluid and cursive, with a large loop at the end.

Jennifer Walkowski  
Historic Preservation Program Analyst  
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](#)

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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](mailto: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](#).

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## **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 archaeological library, as well as other sources such as universities, local libraries, museums, Indian Nations, historical societies, local informants or other pertinent sources. An initial field inspection of the project area must be conducted to assess the level of testing that may be necessary. This study should document the cultural history of the project area, relevant environmental and geological data, the boundaries and description of the proposed project, any previous ground disturbance, known archaeological sites and provide Phase IB field investigation recommendations.

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

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

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

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

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](mailto: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

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[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 83QCQXWHQBX 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](mailto:CRISHelp@parks.ny.gov). For any other questions, please call 518-237-8643.

Sincerely,

**New York State Historic Preservation Office**

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189

518-237-8643 | <https://parks.ny.gov/shpo>

CRIS: <https://cris.parks.ny.gov>

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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](http://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.ny.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](mailto: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 Chautauqua County, LLC.

#### **Materials Found Online at the Sharepoint site below:**

<https://edrco.sharepoint.com/:f/s/EDRProjects/EpT9tBckOFBPhqlou-e0yZQBnZd6oZiQaqwf62FeDy9j0g?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 \(ORES\)](#)  
**Subject:** SHPO Requested Submission Received for Requested Archaeological Survey Project: 20PR03687  
**Date:** Friday, January 22, 2021 6:29:38 PM

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**[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 YE9OAT69MNHBB 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 EXAFOEOUVR1W): *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](mailto:josalyn.ferguson@parks.ny.gov).*

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

Sincerely,

**New York State Historic Preservation Office**

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189

518-237-8643 | <https://parks.ny.gov/shpo>

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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.



## Parks, Recreation, and Historic Preservation

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 (Fraguito 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:

1. 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:

...2

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](mailto:tonseneca@aol.com)

**AND**

Alex Page (Tonawanda Seneca Nation Attorney)  
Berkey Williams  
616 Whittier St. NW  
Washington, DC  
20012  
[alex.c.page@gmail.com](mailto: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  
Onöhsagwë: De' Cultural Center  
82 W. Hetzel St.  
Salamanca, NY 14779  
(716) 945-1760  
[joe.stahlman@sni.org](mailto:joe.stahlman@sni.org)

**Tuscarora Nation**

**Bryan Printup**

Tuscarora Nation  
5226 Walmore Road  
Lewiston, NY 14092  
(716) 264-6011 press 0  
[bprintup@hetf.org](mailto: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](mailto:Josalyn.Ferguson@parks.ny.gov).

Sincerely,



Josalyn Ferguson, Ph.D.  
Scientist Archaeology

*via email only*

c.c. Alex Page, TSN Attorney  
c.c. Derek Rieman, Issac Phillips & John Kuba, ConnectGen  
c.c. Doug Pippin, Grant Johnson, Kristen Olson & William Whipps, EDR

c.c. Andrew Davis, DPS  
c.c. Joe Stahlman, SNI

---

**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [parks.ny.gov](http://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](#); [Moaveni, Houtan \(ORES\)](#)  
**Subject:** SHPO Requested Submission Received for Consultation Project: 20PR03687  
**Date:** Monday, February 22, 2021 3:37:51 PM

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**[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](mailto:CRISHelp@parks.ny.gov). For any other questions, please call 518-237-8643.

Sincerely,

**New York State Historic Preservation Office**

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189

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

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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.





## Parks, Recreation, and Historic Preservation

## Resource Evaluation

**Date:** 02/26/2021

**Staff:** Jennifer Walkowski

**USN Number:** 01322.000104

**Name:** Sawyer-Swezey-Kehrli Farm Complex

**Location:** 4704 Sherman Road/State Route 76, Ripley NY 14775

### Resource Status:

1. **Determination:** Determined SR/NR eligible by the Commissioner of the Office of Parks, Recreation and Historic Preservation on the date noted above.
2. **Contributing:** False

### Criteria for Inclusion in the National Register:

- A. ☐ Associated with events that have made a significant contribution to the broad patterns in our history.
- B. ☐ Associated with the lives of persons significant in our past.
- C. ☒ Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
- D. ☐ Have yielded, or may be likely to yield information important in prehistory or history.



### Summary Statement:



Based on the information provided, the Sawyer-Swezey-Kehrli Farm Complex located at 4704 Sherman Road/State Route 76, Ripley, Chautauqua County, NY appears eligible for the State and National Registers. The farmstead appears to meet criterion C in the area of Architecture as an intact example of a nineteenth-century farm complex which consists of a modest, vernacular Greek Revival-style farm house with later Queen Anne-style porch details, two barns which appear to date from the late nineteenth or early twentieth centuries, plus additional small sheds and outbuildings typical of farm properties. Further research into the history of the families and use of the farm may prove significance under criterion A.

The farmhouse appears to have been built in about 1850, and the farm appears on an 1854 map as the property of L.D. and S.N. Sawyer. An 1867 map identifies the farmstead as the property of "N. Sweezer," and "N. Swezey" is identified on an 1881 map and the property is noted as 150 acres in size. Newell Swezey (1831-1911) is listed in the 1860 United States Census as a farmer living in the Town of Ripley with his wife, Sarah Sheldon Swezey (1838-1900), and their son, Virgil. Swezey was engaged in grain and dairy farming, evidenced by the 11 milk cows and three other cattle, three swine, 22 bushels of wheat, and 100 bushels of oats inventoried on the farm in the 1860 census non-population schedule. By 1915, the farm consisted of 125 acres owned by John Charles Kehrli (1864-1943, born in Switzerland), who lived there with his wife Alwina Papenfuss Kehrli (1873-1918, born in Germany), and their eight children. By 1940, Kehrli had moved from the farm and was living elsewhere in the Town of Ripley with his daughter and son-in-law. As of 2020, the property has been enlarged to 150 acres and is still in agricultural use.

The farm includes a circa-1850 Greek Revival-derived vernacular farmhouse with Queen Anne-style porch details, two barns, and one or more sheds on a 150-acre property consisting of cultivated fields and a forest stand. The residence is a two-story wood-frame building in a gable-and-ell configuration. The main volume is T-shaped in plan with gable roofs. Windows are generally one-over-one wood sash and appear to be early replacements. The exterior is clad asbestos-cement shingle siding. A single-story porch fills the ell formed by the west-facing gable-end volume and the wing to the south, wrapping around the south elevation. The porch's shed roof is supported on bracketed wood posts which appear to be Queen Anne in style. The main roofs and porch roofs are clad in modern sheet metal. Views of the principal entrance, which is set within the porch, are obscured by vegetation. Multiple single-story additions project from the rear (east) of the house.

A large gable-roofed barn measuring roughly 45 feet by 85 feet is located approximately 130 feet east of the house. It is rectangular in plan and oriented on a north-south axis. The barn is two stories tall with board-and-batten siding and a metal roof. Several two-over-two windows are located on the west elevation. A single-story gable-roofed extension is located on the south.

A single-story gable-roofed barn with a roughly 50-foot-square footprint is located approximately 40 feet southeast of the large barn. It has a metal roof and appears to have board-and-batten siding. A small, roughly 12-foot-by-20-foot shed with a metal-clad gable roof is located west of the main barn. Aerial imagery suggests the presence of additional small structures which are not visible from the public right-of-way.



## Parks, Recreation, and Historic Preservation

## Resource Evaluation

**Date:** 02/26/2021

**Staff:** Jennifer Walkowski

**USN Number:** 01322.000105

**Name:** South Ripley Cemetery

**Location:** NE Sherman Road, Ripley NY 14775

### Resource Status:

1. **Determination:** Determined SR/NR eligible by the Commissioner of the Office of Parks, Recreation and Historic Preservation on the date noted above.
2. **Contributing:** False

### Criteria for Inclusion in the National Register:

- A. ☒ Associated with events that have made a significant contribution to the broad patterns in our history.
- B. ☐ Associated with the lives of persons significant in our past.
- C. ☐ Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.
- D. ☐ Have yielded, or may be likely to yield information important in prehistory or history.



### Summary Statement:



Based on the information provided, the South Ripley Cemetery located at NE Sherman Road, Ripley, Chautauqua County, NY appears eligible for the State and National Registers under criterion A in the area of Community Planning and Development and criterion consideration D for its association with the early settlement period of the hamlet of South Ripley. Closer examination of the monuments may identify additional significance in the area of Art. Since relatively few structures remain from this period, the cemetery is a rare resource associated with the early settlement and development of Ripley.

The South Ripley Cemetery is a 1.5-acre community burying ground established in 1836. It is set back approximately 850 feet from NE Sherman Road at the end of an unpaved private drive, atop a small hill surrounded by agricultural fields. Design features include a central drive or walk marked by a pair of mature hydrangeas. Burial markers date from the mid-nineteenth century to the early-twenty-first century and are generally arranged in eight to 10 parallel rows oriented on a north-south axis. According to a regional genealogical society, the cemetery contains over 200 burials, with the earliest dating from the 1830s. Several burial markers date from the 1840s and 1850s, with multiple family groups represented. The cemetery is not indicated on nineteenth- and early-twentieth-century county maps, but it appears to have been part of a 95-acre farm owned by Mead Roberts (1836-1917) from prior to 1867 to at least 1900. Roberts is buried in the cemetery.





## Parks, Recreation, and Historic Preservation

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. Sawyer-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 archeology issues.

---

### Division for Historic Preservation

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [parks.ny.gov](http://parks.ny.gov)

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](mailto:sloane.bullough@parks.ny.gov).

Sincerely,

A handwritten signature in black ink that reads "Sloane Bullough". The signature is written in a cursive style with a large, stylized 'S' and 'B'.

Sloane Bullough  
Historic Sites Restoration Coordinator      via email only



## Parks, Recreation, and Historic Preservation

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, 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 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.

...2

Mr. Houtan Moaveni

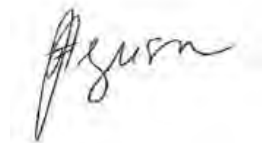
May 26, 2021

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](mailto: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](mailto: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

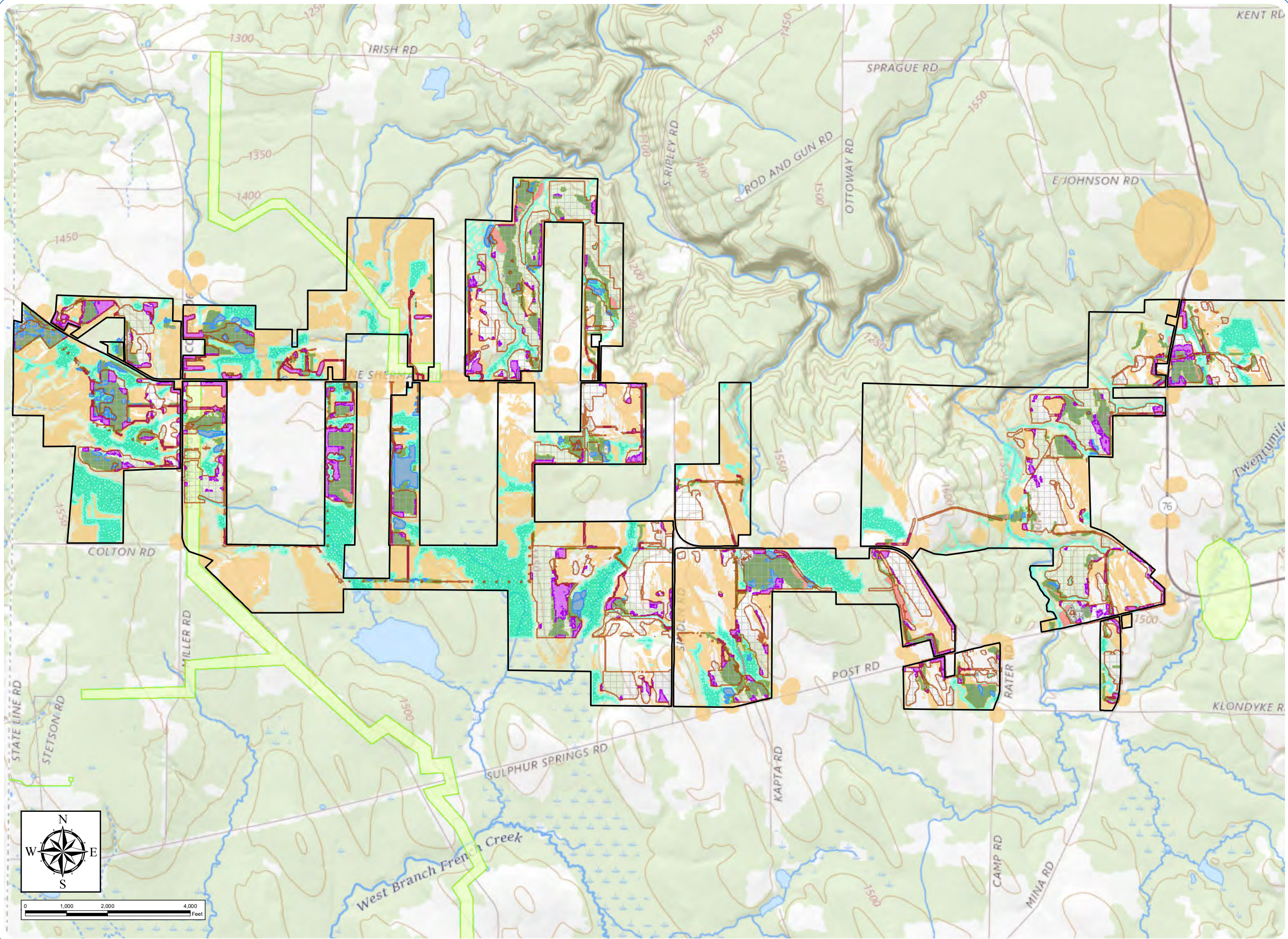
Attachment: Map 1. Supplemental Phase IB Archaeological Survey Research Design



# 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.







**Parks, Recreation,  
and Historic Preservation**

**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](mailto: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.*

---

**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [parks.ny.gov](http://parks.ny.gov)



## 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:

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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]:

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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](mailto: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

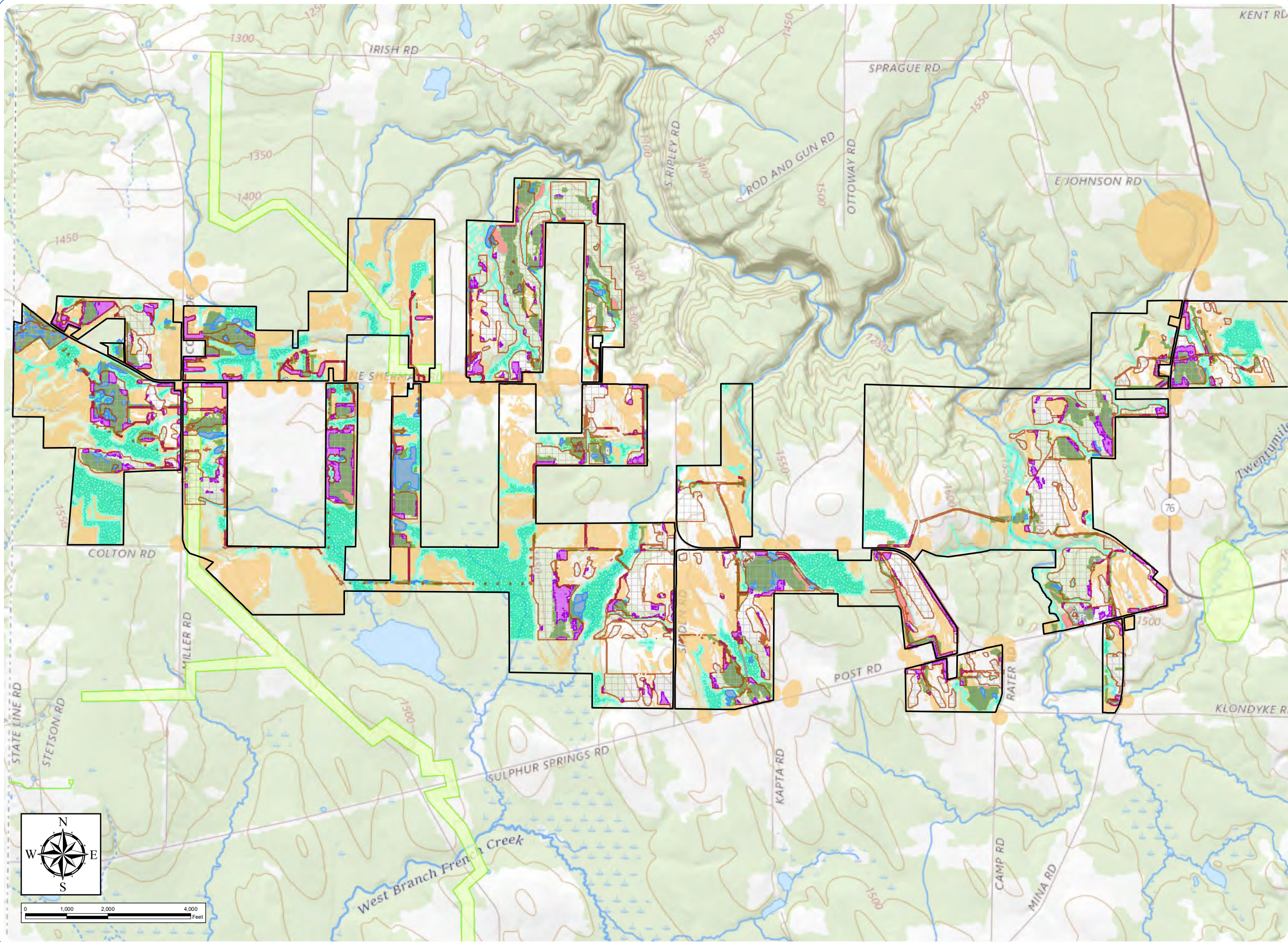
Attachment: Map 1. Supplemental Phase IB Archaeological Survey Research Design



# 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](mailto: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: [Cultural Resources Survey Reports](#).

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)

June 15, 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](mailto:dpippin@edrdpc.com) or (585) 752-6147, or Patrick Heaton at [pheaton@edrdpc.com](mailto: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

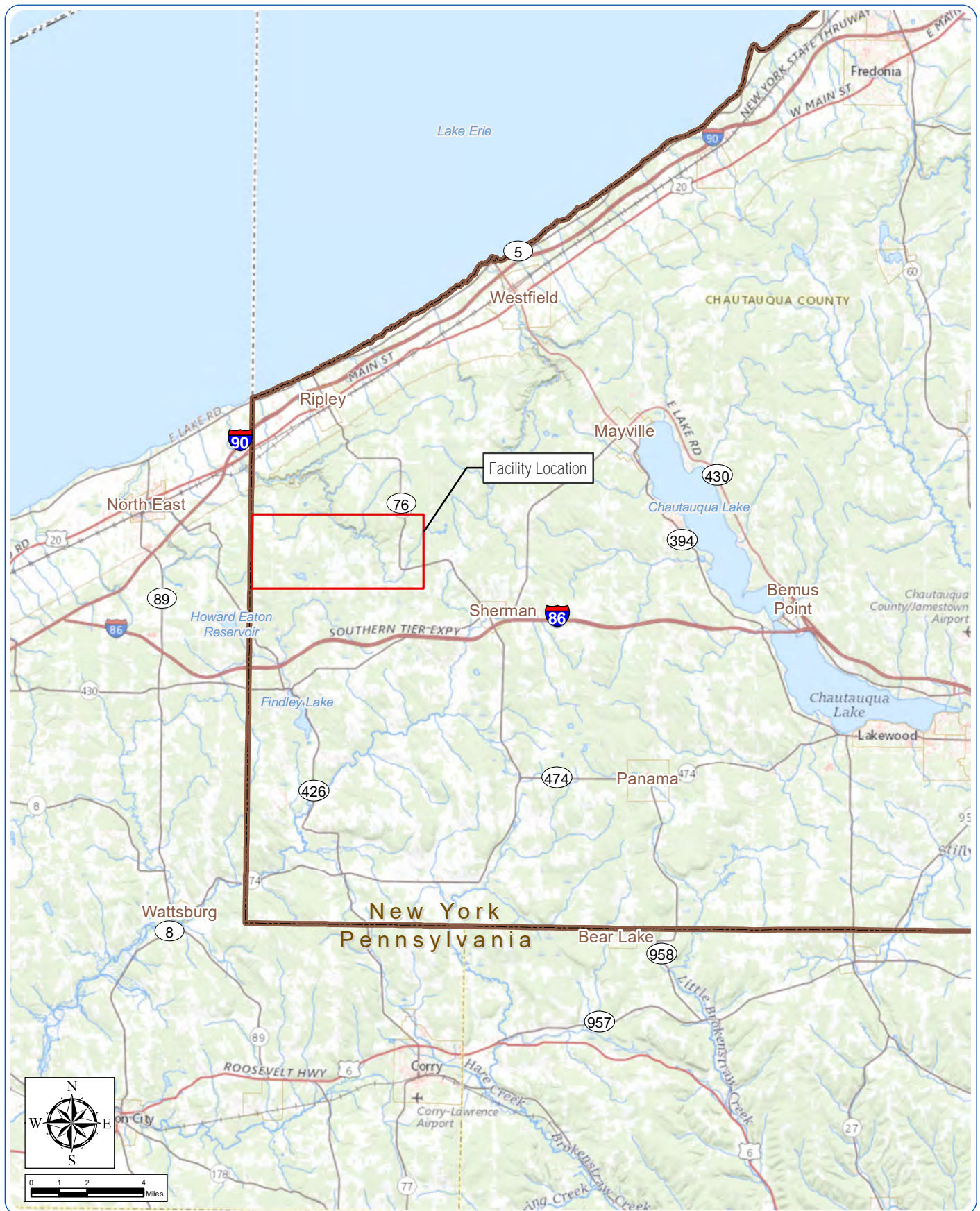
EDR Senior Project Manager, Archaeology

**Attachments:**

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

**Copy to (via email):**

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

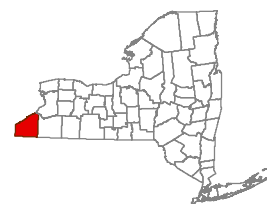


## South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

### Regional Facility Location

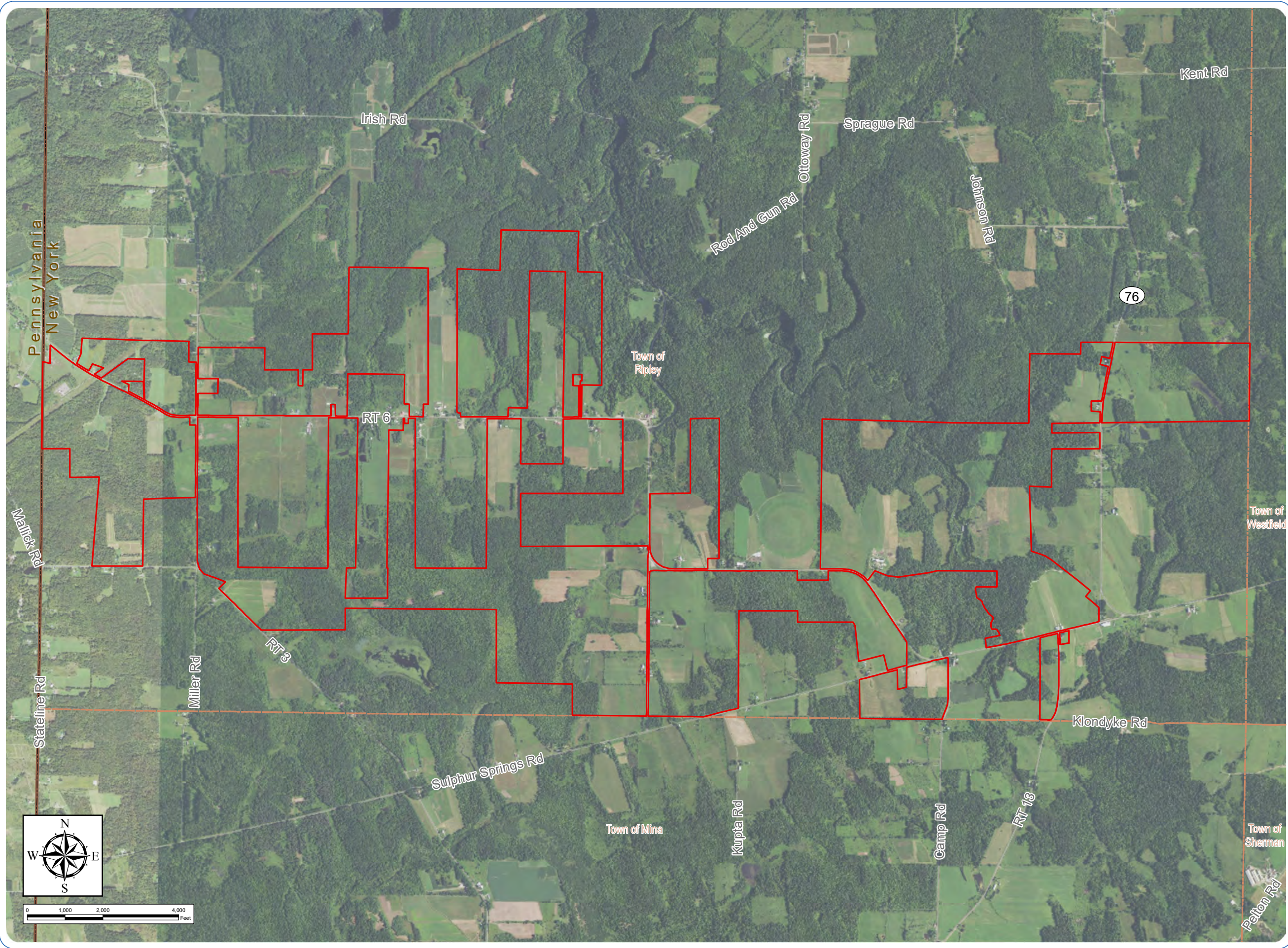
 State Boundary



Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service.  
 2. This map was generated in ArcMap on May 10, 2021. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.







# 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.

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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.

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Development Manager  
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June 15, 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](mailto:dpippin@edrdpc.com) or (585) 752-6147, or Patrick Heaton at [pheaton@edrdpc.com](mailto: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

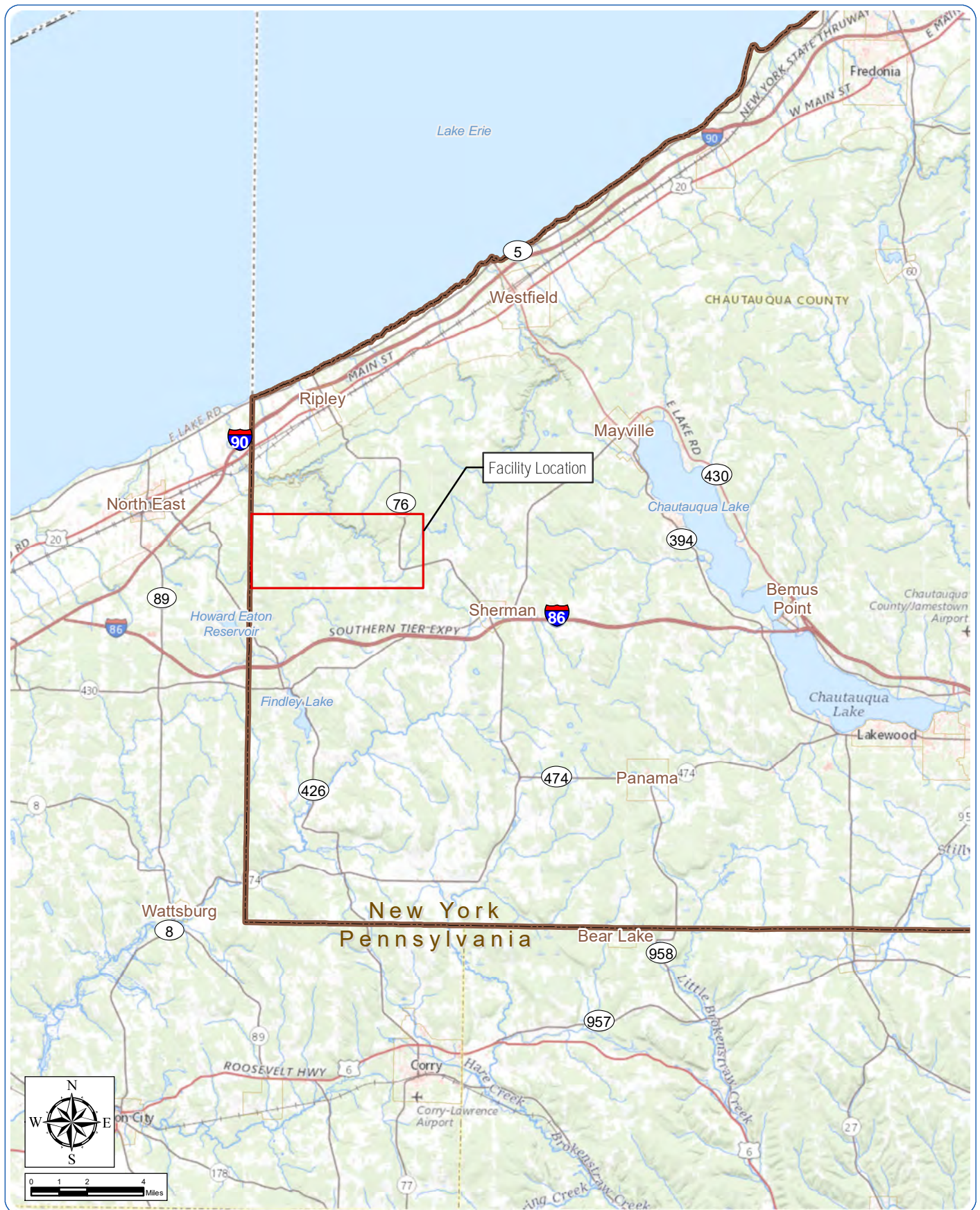
EDR Senior Project Manager, Archaeology

**Attachments:**

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

**Copy to (via email):**

- 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



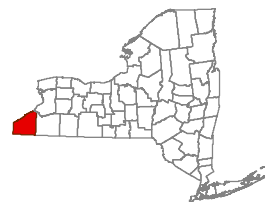
## South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

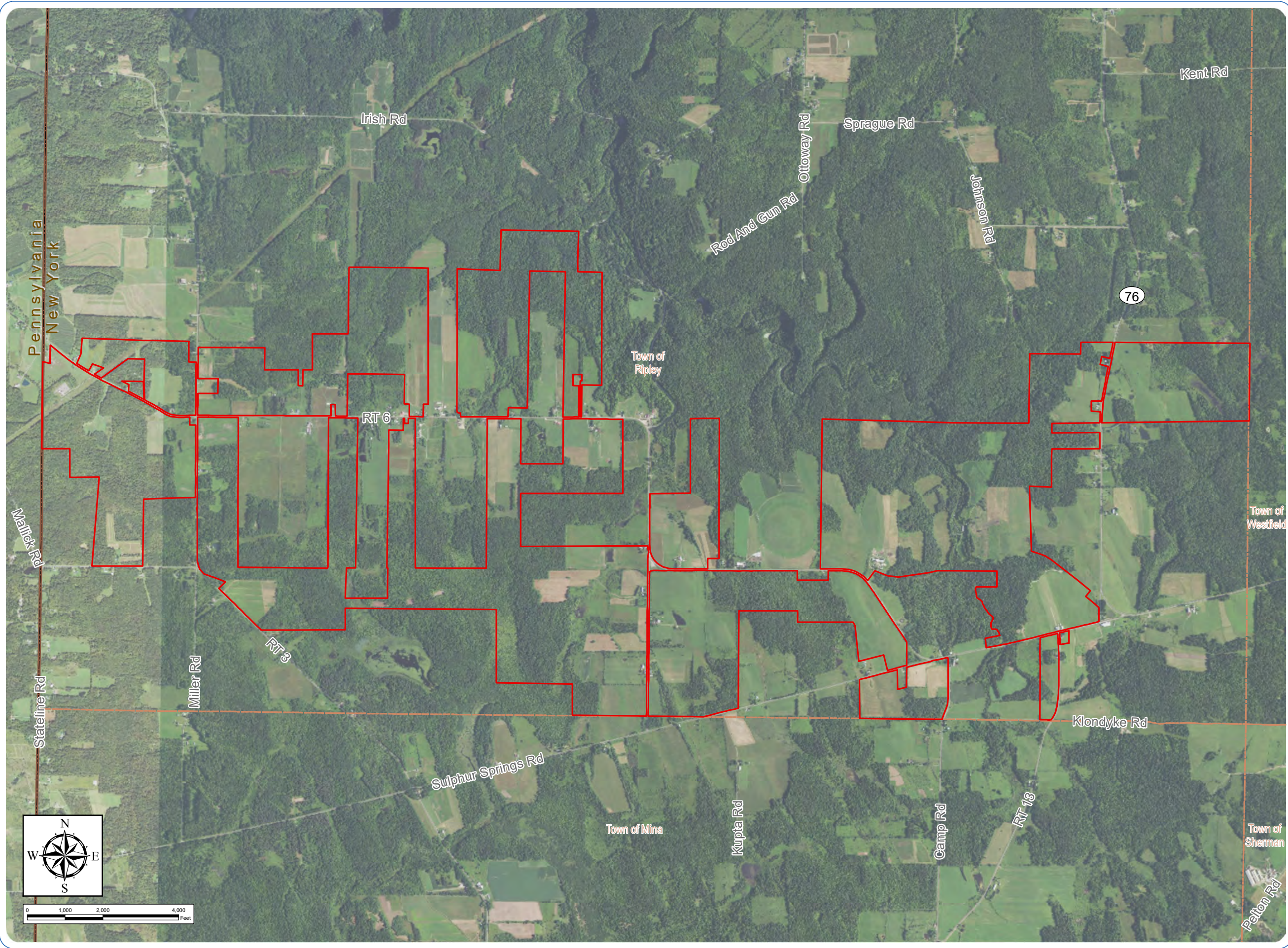
### Regional Facility Location

Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service.  
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 State Boundary







# 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](mailto: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: [Cultural Resources Survey Reports](#).

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)

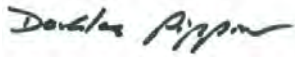
We look forward to working with you, and appreciate your review and/or comments. If you have any questions or would like additional information, please contact me at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com) or (585) 752-6147, or Patrick Heaton at [pheaton@edrdpc.com](mailto:pheaton@edrdpc.com)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

June 15, 2021

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

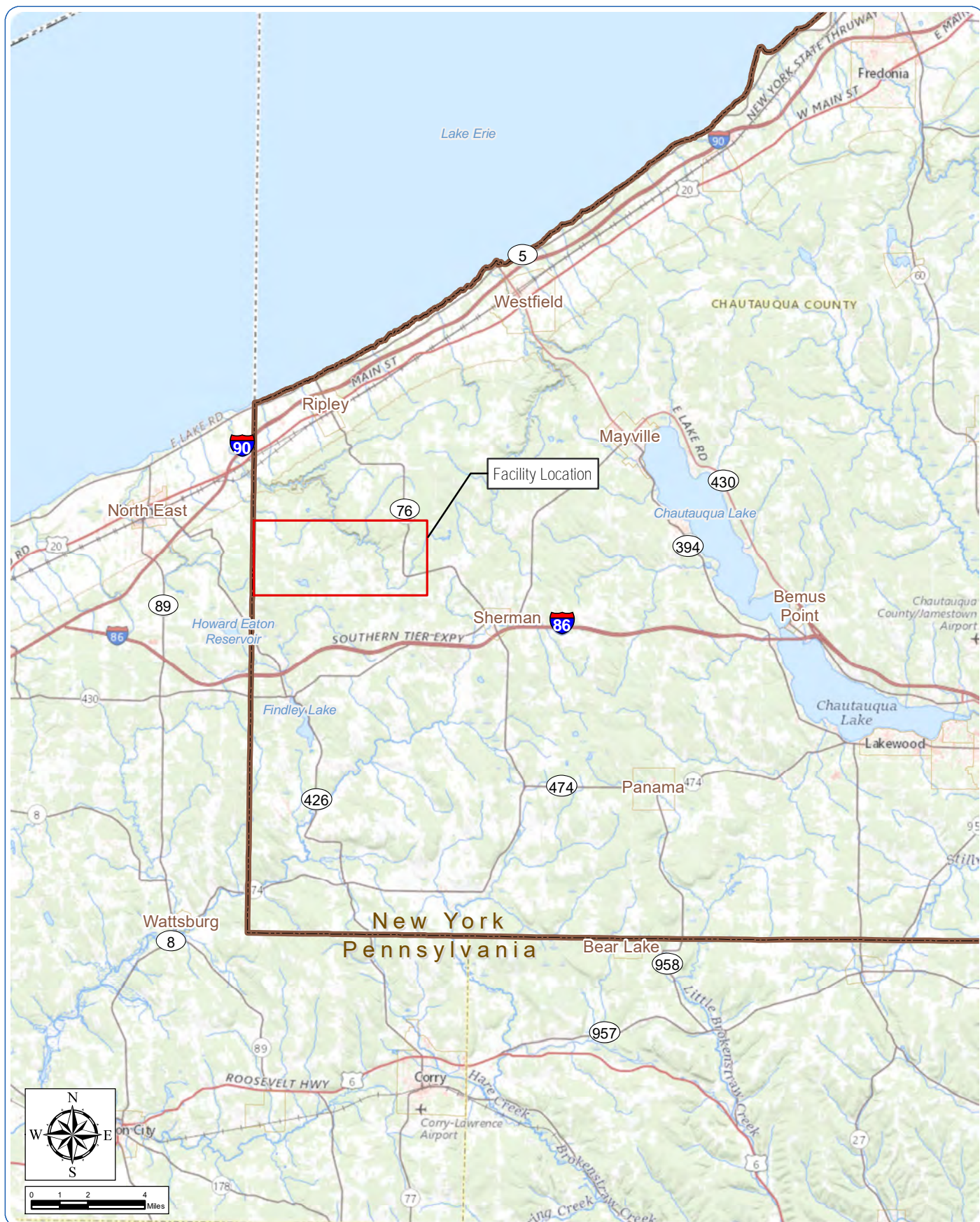
EDR Senior Project Manager, Archaeology

**Attachments:**

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

**Copy to (via email):**

- 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

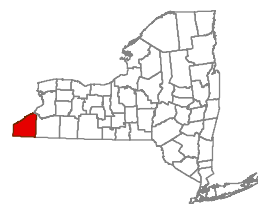


## South Ripley Solar Project

Town of Ripley, Chautauqua County, New York

### Regional Facility Location

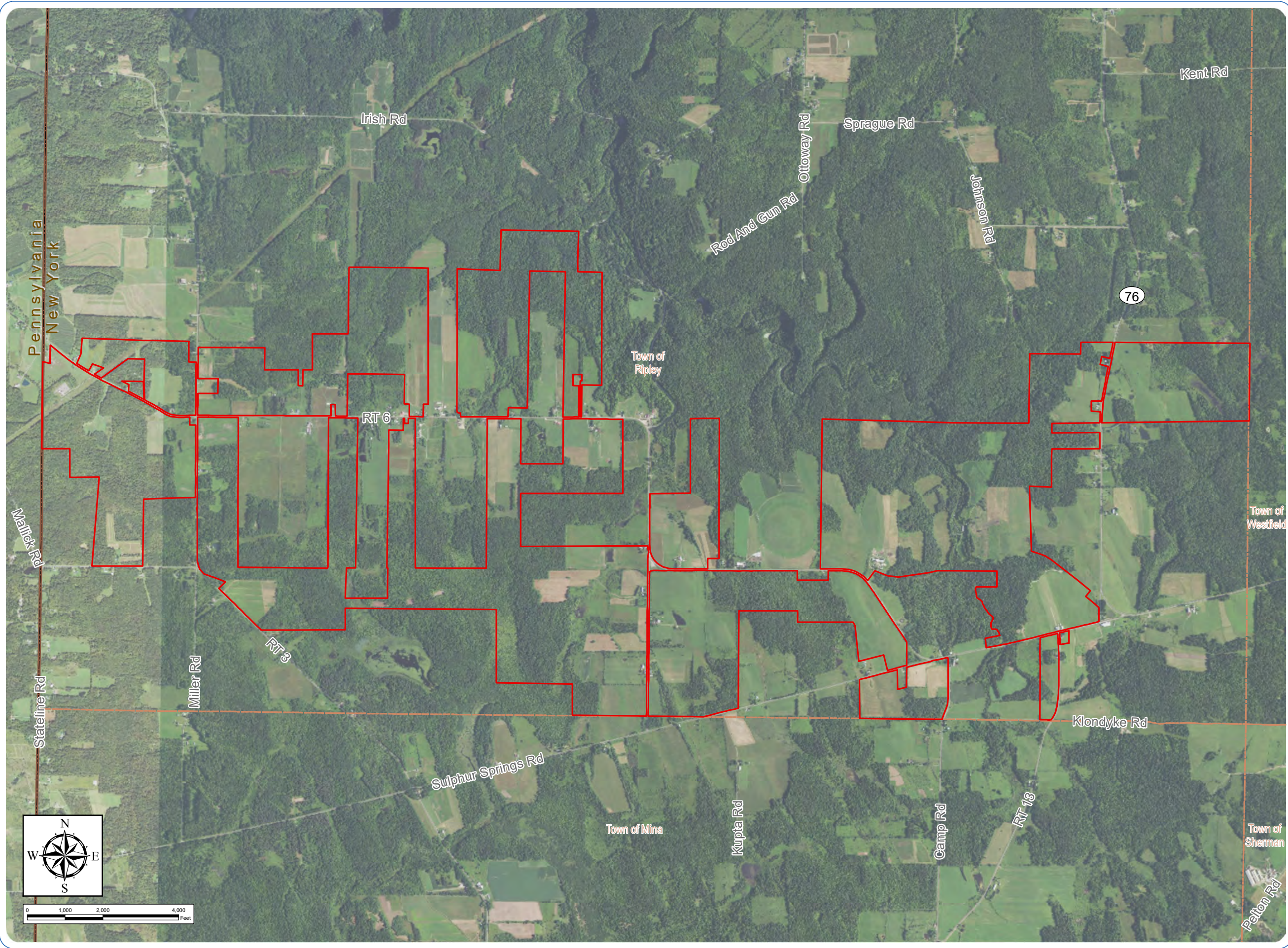
 State Boundary



Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service.  
2. This map was generated in ArcMap on May 10, 2021. 3. This is a color graphic. Reproduction in grayscale may misrepresent the data.







# 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 <[Joe.Stahlman@sni.org](mailto:Joe.Stahlman@sni.org)>  
**Cc:** Isaac Phillips <[iphillips@connectgenllc.com](mailto:iphillips@connectgenllc.com)>; John Kuba <[jkuba@connectgenllc.com](mailto:jkuba@connectgenllc.com)>; Pat Heaton <[PHeaton@edrdpc.com](mailto:PHeaton@edrdpc.com)>; William Whipps <[wwhipps@edrdpc.com](mailto:wwhipps@edrdpc.com)>; Herter, Nancy (PARKS) <[Nancy.Herter@parks.ny.gov](mailto:Nancy.Herter@parks.ny.gov)>; Ferguson, Josalyn (PARKS) <[Josalyn.Ferguson@parks.ny.gov](mailto:Josalyn.Ferguson@parks.ny.gov)>  
**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](http://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 15<sup>th</sup>, 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](mailto: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

July 28, 2021

The cultural resource survey reports listed above are available as PDFs for review and comment on a SharePoint site at this link: [Cultural Resources Survey Reports](#).

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](mailto:dpippin@edrdpc.com) or (585) 752-6147, or Patrick Heaton at [pheaton@edrdpc.com](mailto: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

EDR Senior Project Manager, Archaeology

**Copy to (via email):**

- 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 15<sup>th</sup>, 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.

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July 28, 2021

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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

EDR Senior Project Manager, Archaeology

**Copy to (via email):**

- 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 15<sup>th</sup>, 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.

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Email: [info@southripleysolar.com](mailto:info@southripleysolar.com)  
Phone: (800) 338-8905

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July 28, 2021

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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

EDR Senior Project Manager, Archaeology

**Copy to (via email):**

- 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:** [Grant Johnson](#); [Doug Pippin](#); [Kristen Olson](#); [William Whipps](#); [John Kuba](#); [Isaac Phillips](#); [Derek Rieman](#); [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](mailto:CRISHelp@parks.ny.gov). For any other questions, please call 518-237-8643.

Sincerely,

**New York State Historic Preservation Office**

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

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

consultation with our agency on historic preservation programs or issues.

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

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

You may 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.

## Review Responses

Reviewer	Review Type	Response
Sloane Bullough	Technical Services	<p>Grant, I would like to request the Visual Impact Assessment that you mentioned in your email to me today. Thank you.</p> <p>Sloane Bullough From: Grant Johnson &lt;GJohnson@edrdpc.com&gt; Sent: Tuesday, August 10, 2021 11:31 AM To: Bullough, Sloane (PARKS) &lt;Sloane.Bullough@parks.ny.gov&gt; Subject: Re: South Ripley Solar Project - 20PR03687 Thank you Sloane. If it is helpful I can submit the Visual Impact Assessment that EDR prepared, which includes simulations from the cemetery, including proposed vegetative buffers. Grant Johnson Senior Project Manager - Historic Preservation Environmental Design &amp; Research, Landscape Architecture, Engineering &amp; Environmental Services, D.P.C.</p> <hr/>

## Information Requests

Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	Sloane Bullough	Technical Services	Request a New Attachment, Photo, or Survey for this Consultation Project		Attachment	see description provided



## Letter of Transmittal

**To:** Michael Lynch, Division Director  
Daniel Mackay, Deputy Commissioner  
New York State Office of Parks, Recreation and Historic Preservation  
Division for Historic Preservation (NYSHPO)

**From:** Grant Johnson – Senior Project Manager, Historic Preservation  
Environmental Design & Research, Landscape Architecture & Environmental  
Services, D.P.C. (EDR)

**Date:** August 12, 2021

**Reference:** South Ripley Solar  
Town of Ripley, Chautauqua County, New York  
NYSHPO Project Review #20PR03687  
ORES Case No. 21-00750

**EDR Project No:** 19020

**We are sending:** Application for a Permit to operate a Major Renewable Energy Facility pursuant  
to Section 94-c of the New York State Executive Law and Title 19 of NYCRR, Part  
900

**Sent Via:** NYSHPO Cultural Resource Information System (CRIS) website

Per the requirements of the New York State Office of Renewable Energy Siting (ORES) and on behalf of ConnectGen Chautauqua, LLC, Environmental Design & Research, Landscape Architecture & Environmental Services, D.P.C. (EDR) is providing the Application for a Permit to operate a Major Renewable Energy Facility pursuant to Section 94-c of the New York State Executive Law and Title 19 of NYCRR, Part 900 for the South Ripley Solar project, located in the Town of Ripley, Chautauqua County, New York to the New York State Office of Parks, Recreation and Historic Preservation Division for Historic Preservation (NYSHPO). The complete Application is available via the ORES website at <https://ores.ny.gov/permit-applications> and the New York State Department of Public Service website at <https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=21-00750>. These links have also been provided via the Cultural Resource Information System (CRIS) website.


Please contact Grant Johnson at [gjohnson@edrdpc.com](mailto:gjohnson@edrdpc.com) if you have questions on the information submitted.

**Copies to:** NYSHPO CRIS distribution list



View and/or Address a Response

Project 20PR03687: South Ripley Solar Project/270 MW/2000 acres (XYCJP27S19U2)


 View Project

Please accept the following information below as the consolidated response from NYS SHPO for the above referenced submission.

Review Responses

Reviewer	Review Type	Response
Josalyn Ferguson	Archaeology	In order for SHPO to complete our evaluation of the Archaeological sensitivity of your project, we need further information. Please review the specific information request(s) below and click the Process button to respond to each request.

Information Requests

Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	Josalyn Ferguson	Archaeology	Request a New Attachment, Photo, or Survey for this Consultation Project		Attachment	OPRHP has determined that XEB-AR5-001, much like the isolated finds, is not an archaeological site, and thus a USN has not been created for it. Due to the scale of the survey maps, it is hard to determine the site locations on the landscape as well as the locations and distribution of positive shovel-test-pits (STPs) and artifact find locations. For each of the 15 archaeological sites identified during the Ph. IB and Supplemental Ph. IB investigations, please submit close-up aerial-photo based Site Maps that illustrate the location of each site on the landscape, as well as the corresponding positive (and negative) STPs/surface, find locations. I will then attach the site maps to each of the USNs in CRIS.

**From:** [New York State Parks CRIS Application](#)  
**To:** [Grant Johnson](#); [Doug Pippin](#); [Kristen Olson](#); [William Whipps](#); [John Kuba](#); [Isaac Phillips](#); [Derek Rieman](#); [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](#); [eugene.boesch@arcadis.com](#)  
**Subject:** NY SHPO: Requested Submission UCQDA73O3YVB Received for Consultation Project 20PR03687  
**Date:** Friday, September 3, 2021 12:56:21 PM

---

[EXTERNAL SENDER]

## Requested Submission Received

The New York State Historic Preservation Office (SHPO) has received the following requested submission.

**Requested Submission Token:** UCQDA73O3YVB

**Project Number:** 20PR03687

**Project Type:** Consultation

**Project Name:** South Ripley Solar Project/270 MW/2000 acres

**Other Reference Number:** Siting Board Case 19-F-0560

**Consolidated Response Token:** XYCJP27S19U2

**Previous Submission Number:** 20PR03687.012

**Open Request:** OPRHP has determined that XEB-AR5-001, much like the isolated finds, is not an archaeological site, and thus a USN has not been created for it. Due to the scale of the survey maps, it is hard to determine the site locations on the landscape as well as the locations and distribution of positive shovel-test-pits (STPs) and artifact find locations. For each of the 15 archaeological sites identified during the Ph. IB and Supplemental Ph. IB investigations, please submit close-up aerial-photo based Site Maps that illustrate the location of each site on the landscape, as well as the corresponding positive (and negative) STPs/surface, find locations. I will then attach the site maps to each of the USNs in CRIS.

***The request description above is for reference only. It is not a new request.***

### New York State Historic Preservation Office

Peebles Island State Park, P.O. Box 189, Waterford, NY 12188-0189

518-237-8643 | <https://parks.ny.gov/shpo>

CRIS: <https://cris.parks.ny.gov>

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with the NYS Board of Elections. Not sure if you're registered to vote? [Search your voter registration status](#).

---

### Who sent this email?

This email is a notification from the [New York State Cultural Resource Information System \(CRIS\)](#). CRIS is an online service administered by the [New York State Division for Historic Preservation](#), also known as the New York State Historic Preservation Office (SHPO), which is a division of [New York State Parks, Recreation & Historic Preservation](#).

This message pertains to a submission for a consultation project. Please see SHPO's [Environmental Review](#) web page for more information about the consultation process.

### Why did I receive this email?

The contact list for the project or the requested submission includes your email address.

### What do I need to do?

You do not need to take any action at this time. The submission is now in SHPO's processing queue.

### What will happen next?

If SHPO accepts your submission, you will receive a "Requested Submission Accepted" email notification, the submission will receive a new submission number, and the submission's contents will be added to the project. SHPO will then review the submission.

If SHPO needs more information to process your submission, you will receive a "Requested Submission Found Insufficient" email with the reviewer's comments. You may then revise the submission and resend it to SHPO.

### What else can I do?

Please see the following help topics for more information about managing requested submissions and projects in CRIS:

- [Process an Information Request](#)
- [How do I check the review status of my project?](#)
- [How long does SHPO take to review projects?](#)
- [Submit New Information for an Existing Project](#)

### Where can I get help?

Please visit the CRIS Online Help System: <https://cris.parks.ny.gov/CRISHelp>


If you still have questions about CRIS, please contact CRIS Help at [CRISHelp@parks.ny.gov](mailto:CRISHelp@parks.ny.gov).

For any other questions, please call SHPO at 518-237-8643.



View and/or Address a Response

Project 20PR03687: South Ripley Solar Project/270 MW/2000 acres (5UCNCMVQIOC7)

 View Project

Please accept the following information below as the consolidated response from NYS SHPO for the above referenced submission.

Review Responses

Reviewer	Review Type	Response
Sloane Bullough	Technical Services	In order for SHPO to complete our evaluation of the project area, we need further information. Please review the specific information request(s) below and click the Process button to respond to each request.

Information Requests

Process	Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
	Information Requested	Sloane Bullough	Technical Services	Request a New Attachment, Photo, or Survey for this Consultation Project		Attachment	I requested a phone call with the designer. I emailed Patrick Heaton on Friday, 9-10 and received an email back from Bill Whips toward the end of the day. I will follow up on Monday. (Note, I am not requesting an attachment as CRIS indicates, just a conversation to clarify the vegetative buffer locations.)





## Memorandum

**To:** Sloane Bullough, Historic Sites Restoration Coordinator  
New York State Office of Parks, Recreation and Historic Preservation

**From:** Gordon Perkins and Grant Johnson, EDR

**Date:** September 17, 2021

**Reference:** South Ripley Solar Project  
Town of Ripley, Chautauqua County, New York  
NYSHPO Project Number 20PR03687

**EDR Project No:** 19020

Dear Ms. Bullough:

This memorandum has been prepared to address your inquiry on September 16<sup>th</sup>, 2021 regarding visibility and visual impact determinations for the Sawyer-Swezey-Kehrli Farm Complex (NYSHPO USN01322.000104; hereafter, Farm Complex) located at 4704 Sherman Road (State Route 76) in the Town of Ripley, Chautauqua County, New York. EDR is providing the following clarifying points regarding visibility from this resource, in response to your question about the extent of visibility from the Farm Complex.

### **Viewshed Analysis**

As stated in the Visual Impact Assessment (VIA) prepared for the South Ripley Solar Project (Appendix 8-A of the Section 94 Application - Attachment C, provided to NYSHPO on August 13<sup>th</sup>, 2021), the DSM viewshed analysis indicated only partial visibility of the PV Panels could occur at the Farm Complex and in adjacent open fields around the Farm Complex. As stated in the VIA (Section 5.2.1) a very small area of visibility resulting from the overhead collection line was indicated by the viewshed analysis, which is considered inconsequential due to the size of the overhead poles and the distance (0.7-mile) from which they could be viewed. Regarding the viewshed analysis assumptions, the VIA states the following in Section 4.1.1:

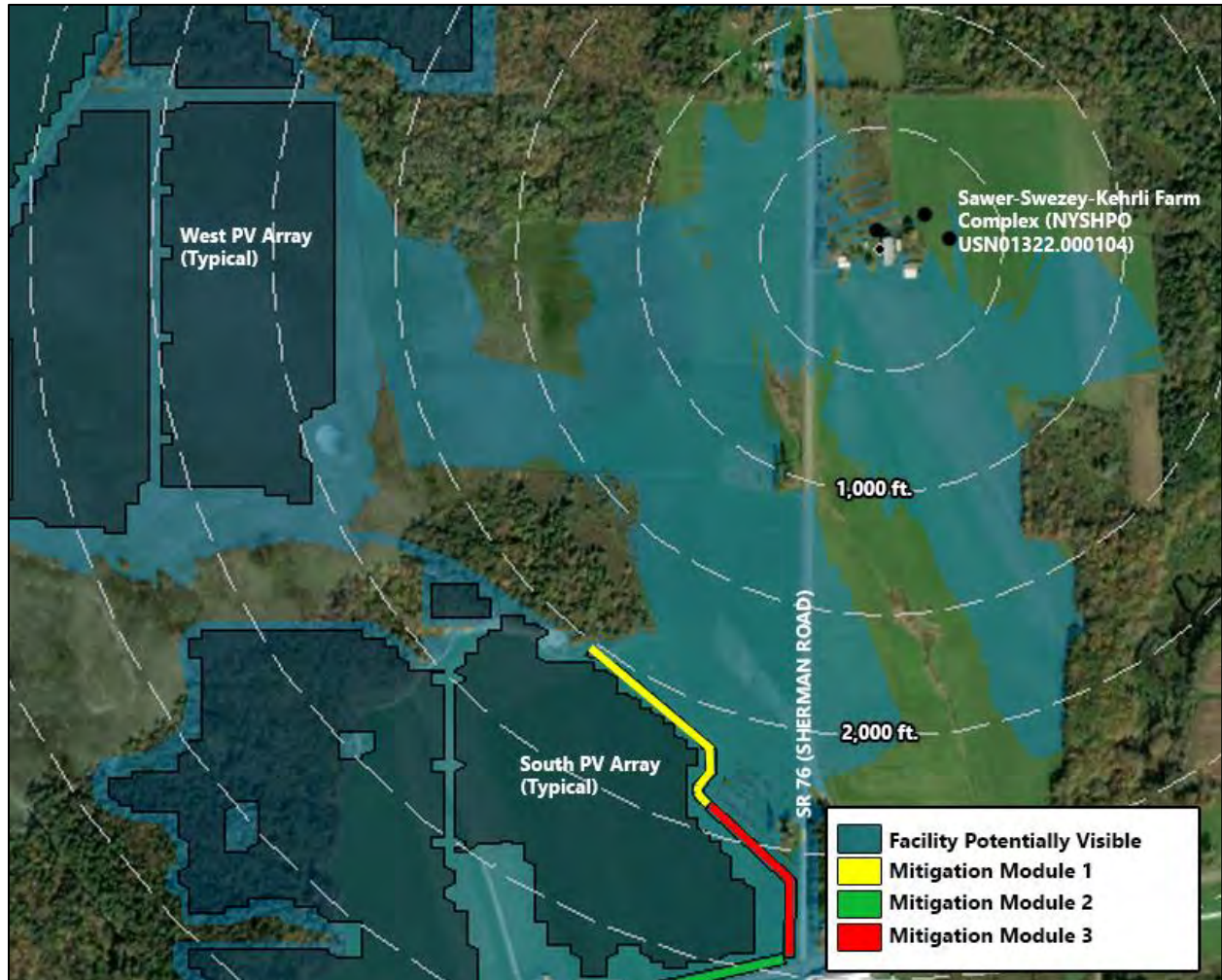
*A few modifications were made to the lidar-derived DSM prior to conducting the analysis. Transmission lines and road-side utility lines that are reflected in the lidar data are generally mis-represented in the DSM as opaque screening features. In order to correct this inaccuracy, DSM elevation values within transmission line corridors and within 50 feet of road centerlines were replaced with bare earth elevation values that provided no additional level of screening. It*



*is important to note that this clearing of the DSM may also eliminate legitimate screening features such as roadside vegetation and structures, which may result in an overstatement of potential Facility visibility along all road corridors within the VSA.*

Potential Facility visibility from the Farm Complex is indicated in Inset 1.

#### INSET 1



In addition to the information provided in the VIA, it is worth noting the following with regard to potential Facility visibility from the Farm Complex:

- The Farm Complex occurs at an elevation of approximately 1574 feet.

- Considering the nearest Facility components to the Farm Complex, one proposed PV Array area is located approximately 2,000 feet to the west of the Farm Complex and sits at an average elevation of 1,469 feet (see West PV Array in Inset 1).
- Considering the nearest Facility components to the Farm Complex, another proposed PV Array area is located approximately 1,900 feet to the south-southwest of the Farm Complex and has an average elevation of 1,502 feet (see South PV Array in Inset 1).

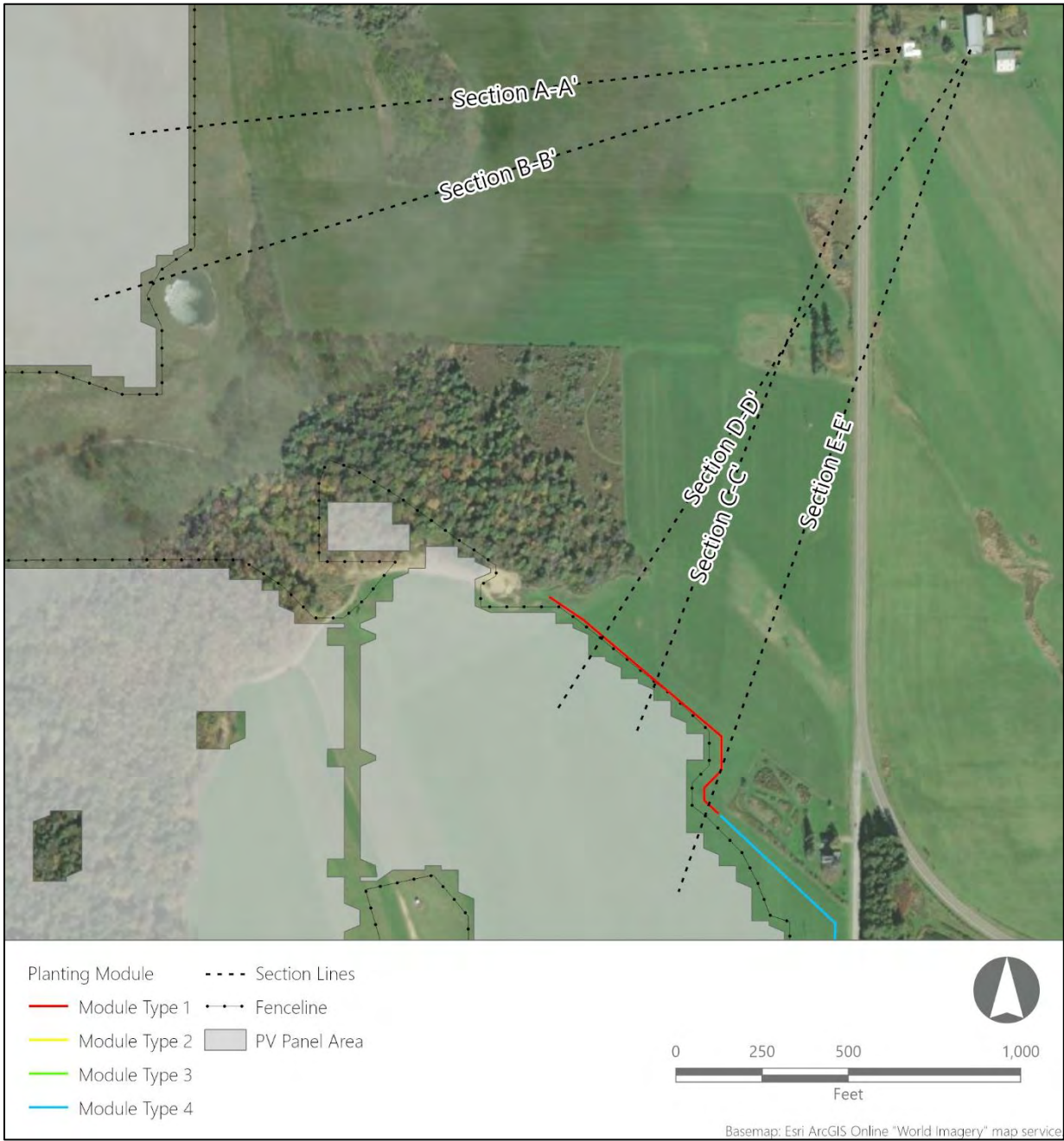
When evaluating the overall visibility of the Facility, the VIA determined that the greatest potential for appreciable visual contrast resulting from the Facility would occur in viewpoint locations that are between 118 feet to 417 feet from the Facility. Visual contrasts from viewpoints located 453 feet, 436, and 654 feet from the Facility were determined to present minimal to minimal/moderate visual contrasts and a view from 4,450 feet was determined to present insignificant/minimal visual contrasts (see Section 5.3.2).

### **Line-of-Sight Analysis**

In addition to the findings presented in the VIA, and to further address the extent of potential Facility visibility from the Farm Complex, EDR is providing line-of-sight information regarding the potential degree of visibility and visual impact resulting from the Facility (see Insets 2-7).

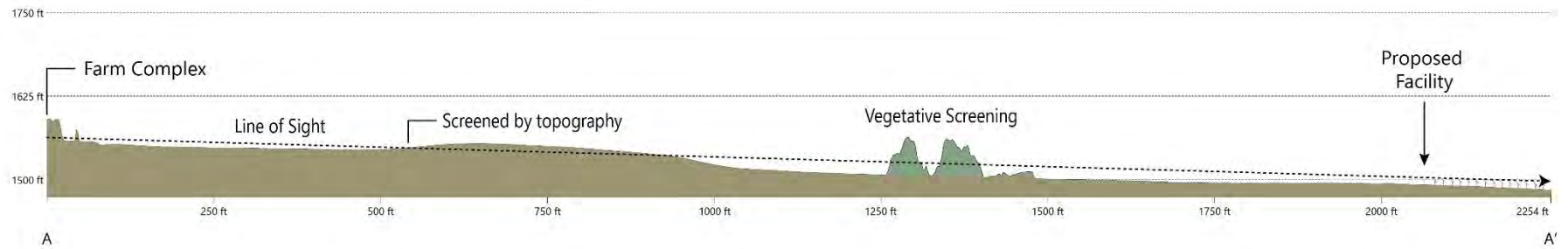
The line-of-sight analysis outlined in this memo indicates that the PV Panels proposed to be located west of the Farm Complex will not significantly contribute to the viewshed due to the presence of intervening topography and woodlot vegetation. This condition is illustrated in two line-of-sight cross sections shown below as Section A-A' and Section B-B' (see Insets 3-4). There is a high degree of certainty that this array will be significantly (if not completely) screened from view by topography alone.

INSET 2

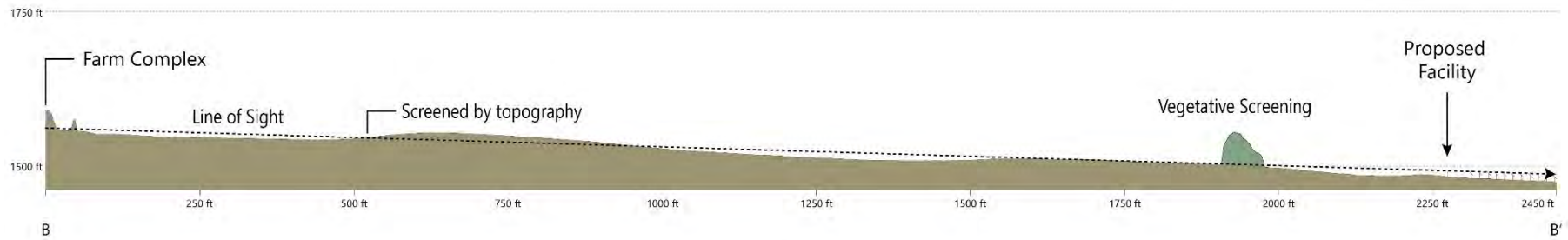




### INSET 3: Section A-A'



### INSET 4: Section B-B'



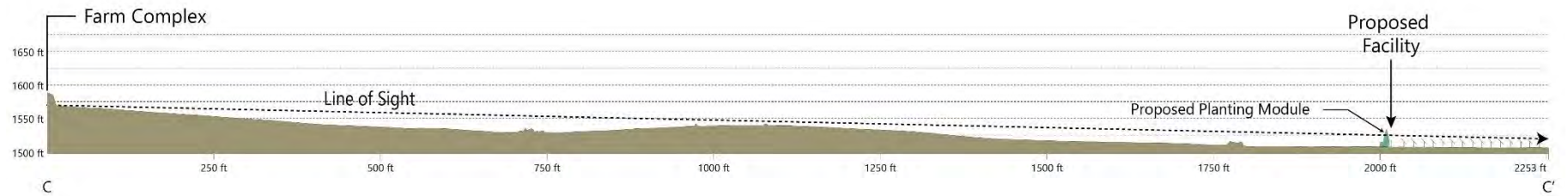
An additional three line-of-sight cross sections were prepared to address potential visibility of the PV panel array to the south of the Farm Complex. As illustrated in Section C-C' (see Inset 5), there is a narrow corridor 2,000 feet from the Farm Complex that could provide potential visibility while looking south-southwest. However, this visibility appears to be limited to the uppermost portions of the PV Panels. In addition, this portion of the Facility is proposed to include planting mitigation Module 1, which will provide additional softening of the PV Arrays where visibility may occur.

Line-of-sight Section D-D' (see Inset 6) illustrates a very similar condition to Section C-C'. Again, the Facility is located approximately 2,000 feet from the Farm Complex and visibility is limited to the upper portions of the PV panels due to the presence of intervening topography and vegetation. This portion of the Facility also includes mitigation Module 1 in this location.

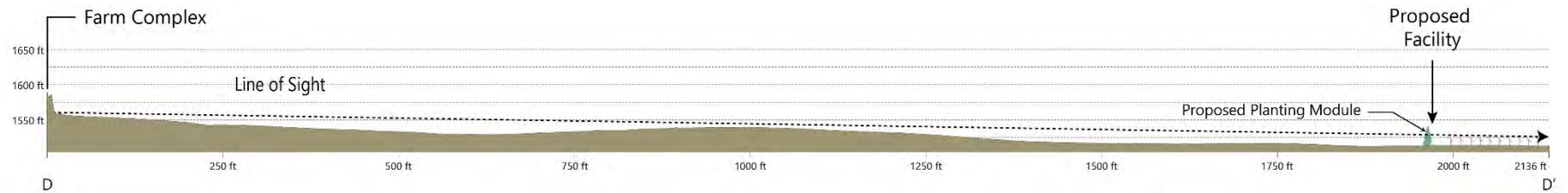
Line-of-sight Section E-E' (see Inset 7) illustrates another potential view of the proposed Facility from a distance of approximately 2,300 feet. From this location the PV panels are partially screened by topography and will be further mitigated by the proposed mitigation Module 1.

Each of the three line-of-sight cross sections illustrating potential visibility of the southern PV Arrays (Sections C-C', D-D', and E-E') also represent a very narrow field of view (approximately 5-10 degrees) toward the Facility. Intervening hedgerows and topography will minimize visibility from lines-of-sight outside of this cone of view. Additionally, the Facility will be further screened from view by a portion of Module 4 mitigation, which extends 780 feet from the northeastern side of the South PV array (see Inset 2).

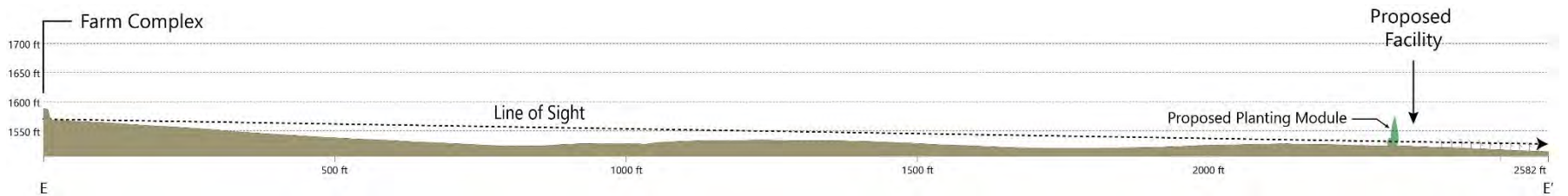
### INSET 5: Section C-C'



### INSET 6: Section D-D'



### INSET 7: Section E-E'





## **Conclusion**

Based on the information presented in the VIA, the line-of sight illustrations demonstrating the limited visibility from the Farm Complex, and distance from the proposed PV panel arrays (approximately 2000 feet), it can be reasonably expected that the visual contrast and visual impact resulting from the Facility would be commensurately low, if not insignificant. Therefore, it is not anticipated that the Facility will have an adverse impact on the Farm Complex.

If you any questions/concerns or would like to discuss the information described herein, please contact Grant Johnson at [gjohnson@edrdpc.com](mailto:gjohnson@edrdpc.com) or Gordon Perkins at [gperkins@edrdpc.com](mailto:gperkins@edrdpc.com).



## Parks, Recreation, and Historic Preservation

KATHY HOCHUL  
Governor

ERIK KULLESEID  
Commissioner

September 21, 2021

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

Re: ORES  
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 provided documents 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 Archaeology Unit and relate only to Archaeological Historic/Cultural resources.

Based upon our review of the Phase IB (Yankel et al. April 2021; 21SR00269) and Supplemental Phase IB (Heaton, Magni & Pippin July 2021; 21SR00455) reports prepared by EDR, OPRHP acknowledges that a total of fifteen (15) Archaeological Sites were identified (7 Indigenous Sites and 8 Historic Sites (see below).

Site	Site Type	Eligibility
JA-001 (USN 01322.000107)	Indigenous Lithic Scatter	Not Eligible
RA-001 (USN 01322.000108)	Indigenous Lithic Scatter	Not Eligible
PA-002 (USN 01322.000109)	Indigenous Lithic Scatter	Not Eligible
OA-001 (USN 01322.000110)	Indigenous Lithic Scatter	Not Eligible
WB-AR4-001 (USN 01322.000111)	Indigenous Lithic Scatter	Not Eligible
WB-AR6-001 (USN 01322.000112)	Indigenous Lithic Scatter	Not Eligible
19020-TS01 (USN 01322.000113)	Indigenous Lithic Scatter	Not Eligible
SB-002 (USN 01322.000114)	19th Century Artifact Scatter	Not Eligible
FC-001 (USN 01322.000115)	19th Century Artifact Scatter	Not Eligible
EB-AR1-001 (USN 01322.000116)	19th Century Artifact Scatter	Not Eligible
19020-MS01 Clark-Wilcox Mill Site (USN 01322.000117)	19th Century & Indigenous Artifact Scatter	Not Eligible
XLYA-001 (USN 01322.000119)	19th Century Artifact Scatter	Not Eligible
XAR-001 (USN 01322.000120)	19th Century Artifact Scatter	Not Eligible
J. Thorpe-001 (USN 01322.000121)	19th Century Artifact Scatter	Not Eligible
XWB-AR6-001	Indigenous Lithic Scatter	Not Eligible

...2

Mr. Houtan Moaveni  
September 21, 2021  
Page 2.

OPRHP has determined that all fifteen (15) sites are not eligible for inclusion in the State and National Registers of Historic Places, and thus no further archaeological investigations are warranted. OPRHP has no further archaeological concerns for this project. Should project designs change, including an expansion of the proposed project, OPRHP recommends further consultation with our office.

Please note, before a determination of effect can be rendered by this office, Sloane Bullough of our Technical Unit must complete her review. Ms. Bullough can be reached at [Sloane.Bullough@parks.ny.gov](mailto:Sloane.Bullough@parks.ny.gov).

If you have any questions, I can be reached via e-mail at [Josalyn.Ferguson@parks.ny.gov](mailto:Josalyn.Ferguson@parks.ny.gov).

Sincerely,



Josalyn Ferguson, Ph.D.  
Scientist Archaeology

*via email only*

c.c. Alex Page, Christine Abrams & Cole Reuben, TSN  
c.c. Bryan Printup, Tuscarora Nation  
c.c. D. Pippin, G. Johnson, J. Sabino, K. Olson, P. Heaton & W. Whipps, EDR  
c.c. Isaac Phillips & John Kuba, ConnectGen  
c.c. Jasmine Matley, DPS  
c.c. Joe Stahlman, SNI





## Parks, Recreation, and Historic Preservation

KATHY HOCHUL  
Governor

ERIK KULLESEID  
Commissioner

October 15, 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  
Town of Ripley, Chautauqua County, NY  
20PR03687  
Siting Board Case 19-F-0560

Dear Mr. Moaveni:

Thank you for providing additional information to 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).

The project consists of a 270-megawatt (MW) solar photovoltaic (PV) energy generating project. The Facility Site is 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.

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. Sawyer-Swezey-Kehrli Farm Complex
2. South Ripley Cemetery

Because of the historic properties and the fact that ground disturbance is proposed, we have reviewed the project

It is the opinion of OPRHP that the project will have No Adverse Impact on the Sawyer-Swezey-Kehrli Farm Complex and the South Ripley Cemetery or any other historic resources on the following conditions:

1. The vegetative buffers that you have proposed follow the guidelines below:
  - A. It is located on the solar project property and the solar project owner is responsible for it.
  - B. It consists of a mixture of indigenous coniferous and deciduous trees and shrubs that are staggered, not in straight rows.

- C. The trees are balled and burlapped, and have a 4-inch caliper unless otherwise specified by a tree specialist.

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

Sincerely,

A handwritten signature in black ink that reads "Sloane Bullough". The signature is written in a cursive, flowing style.

Sloane Bullough  
Historic Sites Restoration Coordinator      via email only



## Memorandum

**To:** Jennifer Walkowski, Survey & National Register Unit  
Dr. Josalyn Ferguson, Archaeology Unit  
Sloane Bullough, Technical Assistance and Compliance Unit  
New York State Historic Preservation Office (NYSHPO)

**From:** Kristen Olson and Doug Pippin  
Environmental Design & Research, Landscape Architecture, Engineering &  
Environmental Services, D.P.C. (EDR)

**Date:** November 17, 2021

**Reference:** South Ripley Solar Project  
Revised Facility Layout  
NYSHPO Project Review # 20PR03687

**EDR Project No:** 19020

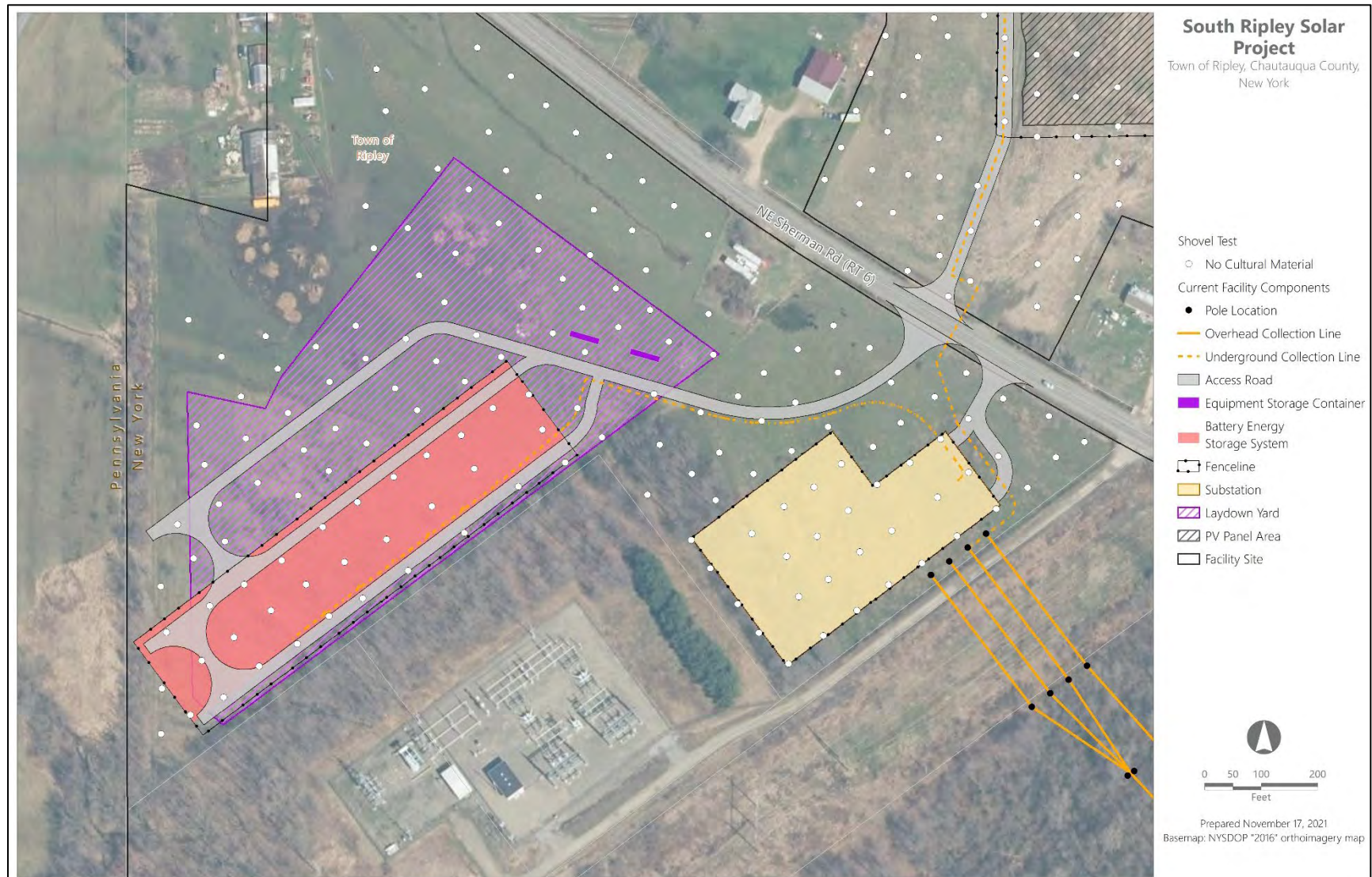
On behalf of ConnectGen Chautauqua County LLC (the Applicant), a direct subsidiary of ConnectGen LLC, EDR has prepared this memorandum and attached figures for the proposed South Ripley Solar Project (the Facility) to enable review of the Facility's potential effect on cultural resources. EDR has conducted archaeological and historic resources surveys for the Facility. Following the most recent correspondence with the New York State Office of Parks, Recreation and Historic Preservation (NYSHPO) regarding the Facility, there has been a minor layout revision, which is summarized below. The purpose of this memorandum is to provide documentation to NYSHPO describing the revised layout and requesting confirmation that this minor layout change will not result in adverse effects to cultural resources.

### Revised Facility Description

The proposed Facility is described in Section 1.2 of the *Phase IB Archaeological Survey Report* (EDR, 2021a). As described in the report, the Facility was to include a collection substation as well as a new point of interconnection (POI) with associated transmission equipment connecting directly to the existing National Grid substation or located within a new switchyard adjacent to the existing substation (see Figure 1).



Figure 1. Previous Facility Layout (POI and Substation)



Subsequent to NYSHPO's review of cultural resources surveys for the Facility and finding of No Adverse Impact in September 2021 (NYSHPO, 2021a, 2021b), the Applicant is being required by National Grid and the New York Independent Systems Operators (NYISO) to revise the layout by adding a new stand-alone substation tapping the high voltage line. The new substation will be very similar in size and equipment to the existing National Grid substation. This new POI will be located in the approximate location of the collection substation in the previous design and will have its own access road and fence line. The collection substation will be moved from the originally proposed location in the previous design to north of the Battery Energy Storage System (BESS) and it will tie into a new 3-breaker ring POI rather than the existing National Grid substation. It will contain the same equipment as before, but potentially in a different configuration or arrangement. This will require adjustments to fence line and access roads to both the collection substation and the BESS (see Figure 2).

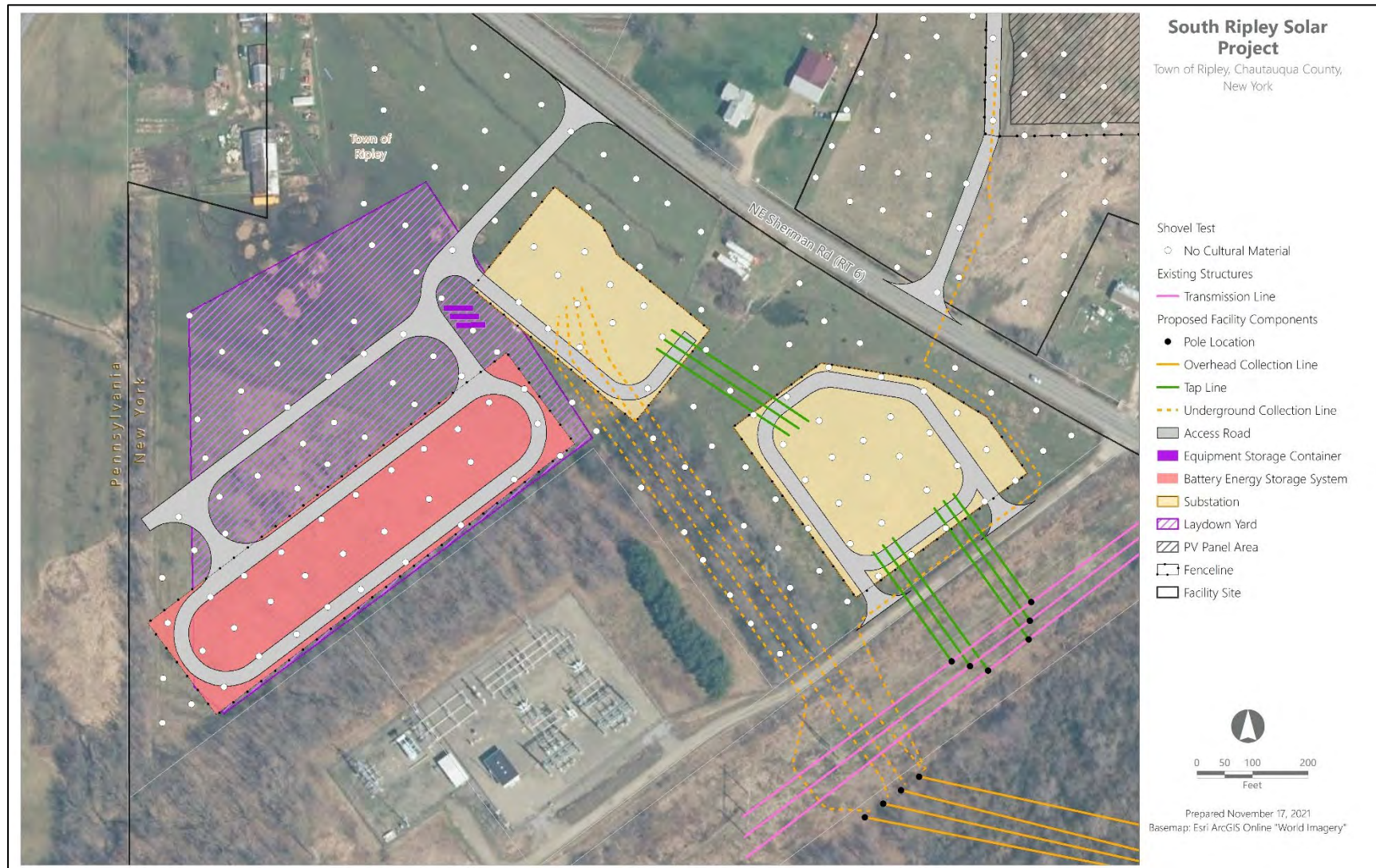
### **Evaluation of Impacts to Archaeological Resources**

EDR conducted Phase IB survey field work concurrent with the Facility layout design throughout 2020 and 2021. EDR submitted a *Phase IB Archaeological Survey Report* (21SR00269) in April 2021 (EDR, 2021a) and a *Supplemental Phase IB Archaeological Survey* (21SR00455) in July 2021 (EDR, 2021b). As noted in these reports, construction of the Facility will require soil disturbance. The Applicant has designed the Facility in order to minimize soil disturbance and potential impacts to archaeological resources. The Phase IB surveys identified a total of 15 archaeological sites, none of which were recommended to meet eligibility criteria for listing in the State/National Register of Historic Places (S/NRHP). On September 21, 2021, NYSHPO provided a review letter concurring with EDR's findings and stating that NYSHPO had no further archaeological concerns for the Facility (NYSHPO, 2021a).

The proposed revisions to the Facility layout are limited to parcels which have already been surveyed for archaeological resources. These parcels were subjected to shovel testing during the Phase IB archaeological survey, which did not yield any cultural material. None of the 15 archaeological sites identified during Phase IB survey are within or near the parcels affected by the revised layout. Likewise, no previously identified archaeological sites recorded in the NYSHPO Cultural Resources Information System (CRIS) are located within or near these parcels. Therefore, the revised Facility layout is not anticipated to result in any adverse effects on archaeological resources.

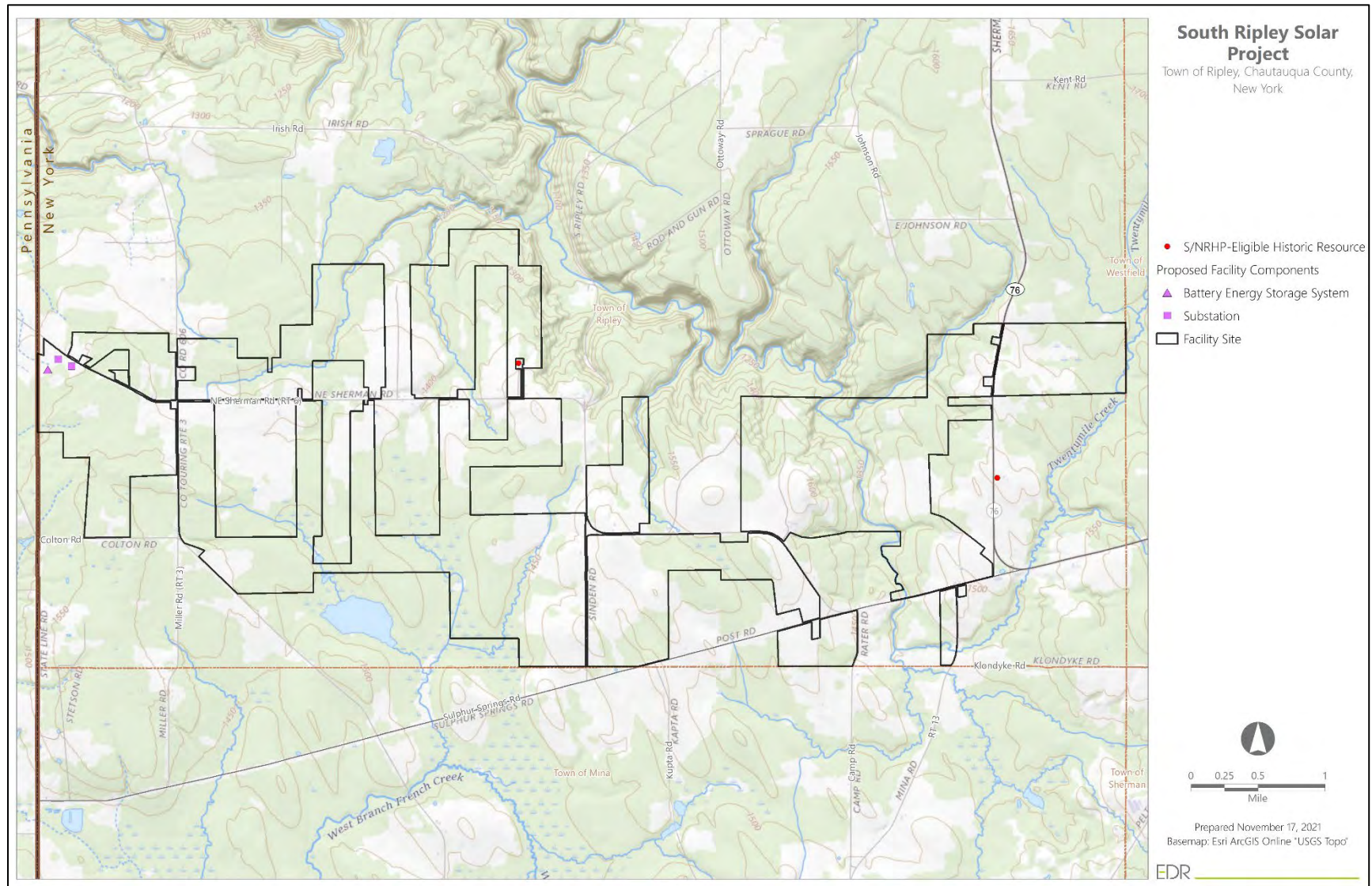


Figure 2. Proposed Facility Layout (POI and Substation)





### Figure 3. Location of S/NRHP-Eligible Historic Resources



### Evaluation of Impacts to Historic Resources

EDR conducted a historic resources survey for the Facility in 2020 and submitted a *Historic Resources Survey Report* (20SR00498) to NYSHPO in February 2021 (EDR, 2021c). As noted in the *Historic Resources Survey Report*, the Facility will have no physical impacts to historic resources. The Facility's potential effect on a given historic resource would be a change (resulting from the introduction of photovoltaic panel arrays and related infrastructure) in the resource's visual setting. The historic resources survey addressed 2-mile and 5-mile radius study areas and an Area of Potential Effect (APE) for Indirect Effects based on a viewshed considering only the screening effects of topography, in accordance with the 2020 NYSHPO *Guidelines for Solar Facility Development Cultural Resources Survey Work* (NYSHPO, 2020). The survey evaluated a total of 11 historic resources. Of these, two were recommended to meet S/NRHP eligibility criteria:

- South Ripley Cemetery (USN 01322.000105), a 1.5-acre community burying ground with over 200 burials established in 1836; and
- The Sawyer-Swezey-Kehrli Farm Complex (USN 01322.000104), a farmstead with a Greek Revival-derived vernacular farmhouse and two barns.

NYSHPO concurred with EDR's recommendations regarding these two resources and provided a review letter on October 15, 2021, finding that the Facility would have No Adverse Impact on the two resources provided that the Applicant follows the visual screening guidelines stated in the letter (NYSHPO, 2021b).

Following the submission of EDR's *Historic Resources Survey Report* for the Facility, NYSHPO updated the *Guidelines for Solar Facility Development Cultural Resources Survey Work* (NYSHPO, 2021c). For solar arrays covering more than 200 acres, the updated guidelines require survey of resources 50 years old or older within 1-mile of the solar array and which fall within an APE for Indirect Effects based on a GIS analysis of facility visibility considering the screening effects of topography and estimated existing vegetation heights. Therefore, for the purposes of identifying historic resources which may be indirectly affected by the Facility, the 2-Mile and 5-Mile Historic Resources Study Areas and APE for Indirect Effects implemented as part of the historic resources survey for the Facility are considered by EDR to be conservative. Potential indirect (visual) effects of Facility components greater than one mile from historic resources are expected to be minimal.

The proposed Facility layout revision will not substantially alter the type or scale of equipment associated with the POI substation. Per the previous layout and as described in the *Historic Resources Survey Report* (EDR, 2021c), the tallest features associated with the Facility were to have maximum heights of 70 feet or more. The tallest features associated with the revised layout (lightning masts, a deadend structure between the POI and collection substations, and 3-pole

transmission line structures) will have maximum heights between 70 and 85 feet. Furthermore, the Facility components affected by the revised layout are located approximately 2.3 miles from South Ripley Cemetery and approximately 5.0 miles from the Sawyer-Swezey-Kehrli Farm Complex. Therefore, due to the limited nature of the layout revision and the significant distance between the POI substation and the two S/NRHP-eligible resources, the layout revision is not anticipated to result in any adverse effects on historic resources.

## Summary and Conclusions

It is the opinion of EDR that the proposed revision to the Facility layout will not result in any adverse effects on cultural resources. The revision does not increase the archaeological APE that was evaluated in the Phase IB archaeological survey. In addition, the revised Facility components are located within parcels that were subjected to Phase IB survey, which yielded no cultural material. Regarding potential visual impacts to historic resources, it is the opinion of EDR that minor changes in the layout of components located more than two miles from S/NRHP-eligible historic resources will not substantially alter the visual setting of these resources. The proposed Facility layout revisions do not change the findings of previous cultural resources surveys conducted by EDR for the Facility.

Following your review of this memorandum, please provide EDR with a letter confirming your concurrence at your earliest convenience.

If you have any questions/concerns or would like to discuss the revised Facility layout described herein, please contact Kristen Olson at [kolson@edrdpc.com](mailto:kolson@edrdpc.com) or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com).



Kristen Olson  
Project Architectural Historian  
Environmental Design & Research

## REFERENCES CITED



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

EDR. 2021b. *Supplemental Phase IB Archaeological Survey, South Ripley Solar Project, Town of Ripley, Chautauqua County, New York*. Prepared for ConnectGen Chautauqua County LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY.

EDR. 2021c. *Historic Resources Survey, South Ripley Solar Project, Town of Ripley, Chautauqua County, New York*. Prepared for ConnectGen Chautauqua County LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY.

New York State Office of Parks, Recreation, and Historic Preservation (NYSHPO). 2020. *Guidelines for Solar Facility Development Cultural Resources Survey Work*. New York State Historic Preservation Office, Waterford, NY. July 2020.

NYSHPO. 2021a. Re: DPS/ORES, South Ripley Solar Project/270MW/2000 acres, ~2000 acres within Town of Ripley, Chautauqua County, NY, 20PR03687, Siting Board Case 19-F-0560. Correspondence dated September 21, 2021. New York State Office of Parks, Recreation and Historic Preservation, Waterford, NY.

NYSHPO. 2021b. Re: Project 20 PR03687: South Ripley Solar Project/270MW/2000 acres (43INJ8OD1FB9). Correspondence dated September 16, 2021. New York State Office of Parks, Recreation and Historic Preservation, Waterford, NY.

NYSHPO. 2021c. *Guidelines for Solar Facility Development Cultural Resources Survey Work*. New York State Historic Preservation Office, Waterford, NY. May 2021.



## Memorandum

**To:** Jennifer Walkowski, Survey & National Register Unit  
Dr. Josalyn Ferguson, Archaeology Unit  
Sloane Bullough, Technical Assistance and Compliance Unit  
New York State Historic Preservation Office (NYSHPO)

**From:** Kristen Olson and Doug Pippin  
Environmental Design & Research, Landscape Architecture, Engineering &  
Environmental Services, D.P.C. (EDR)

**Date:** December 10, 2021

**Reference:** South Ripley Solar Project  
Revised Facility Layout  
NYSHPO Project Review # 20PR03687

**EDR Project No:** 19020

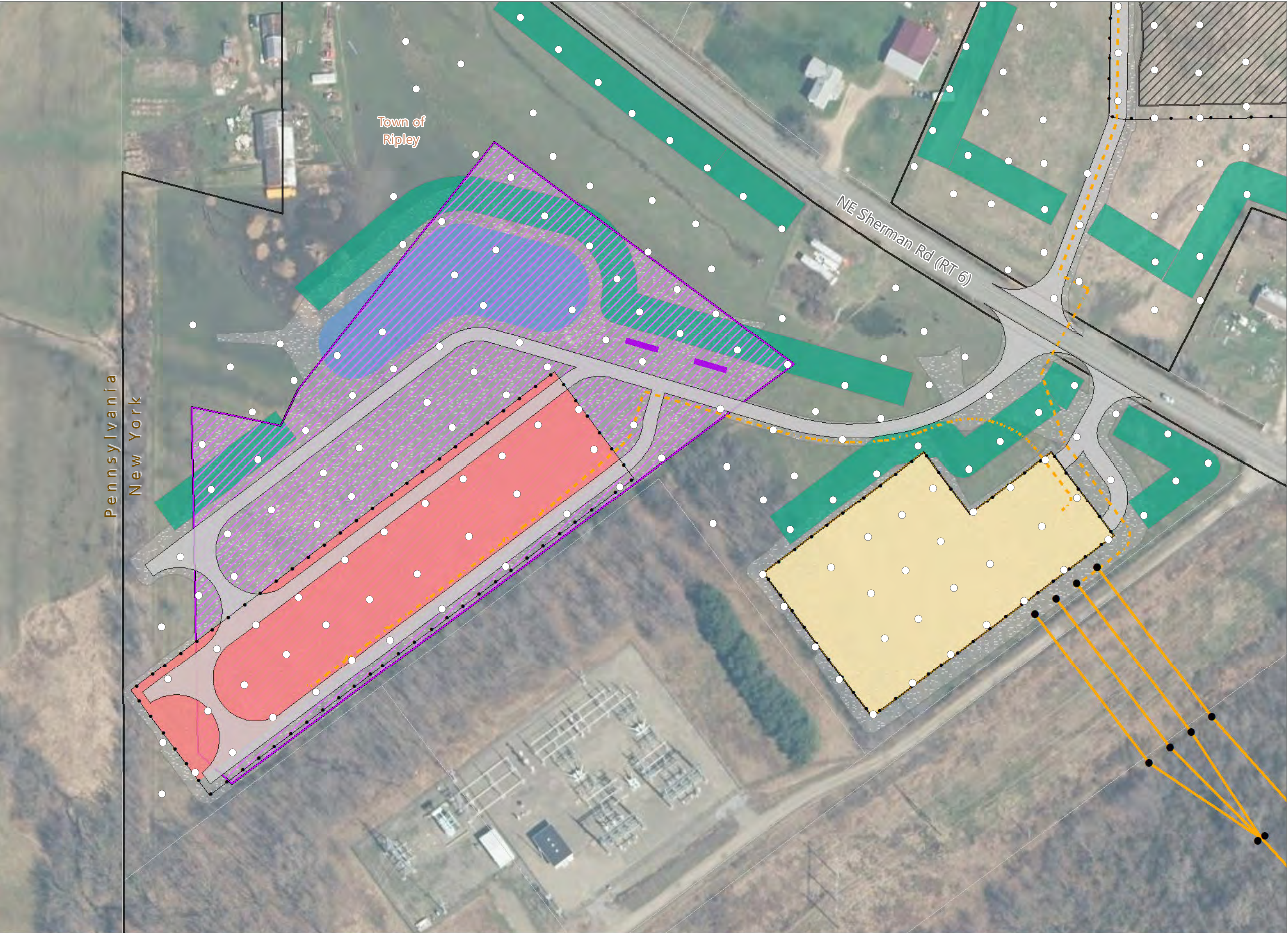
On behalf of ConnectGen Chautauqua County LLC (the Applicant), a direct subsidiary of ConnectGen LLC, EDR has prepared this memorandum and attached figures for the proposed South Ripley Solar Project (the Facility) to enable review of the Facility's potential effect on cultural resources. EDR has conducted archaeological and historic resources surveys for the Facility. The New York State Office of Parks, Recreation and Historic Preservation (NYSHPO) has previously reviewed the Facility and concluded no adverse effects to historic structures or archeological sites as documented in correspondence from October 15, 2021 and September 21, 2021. Subsequent to the previous reviews, the Applicant has made a minor layout revision, which is summarized below. The purpose of this memorandum is to provide documentation to NYSHPO describing the revised layout and requesting confirmation that this minor layout change will not result in adverse effects to cultural resources.

### Revised Facility Description

The proposed Facility is described in Section 1.2 of the *Phase IB Archaeological Survey Report* (EDR, 2021a). As described in the report, the Facility was to include a collection substation as well as a new point of interconnection (POI) with associated transmission equipment connecting directly to the existing National Grid substation or located within a new switchyard adjacent to the existing substation (see Figure 1).

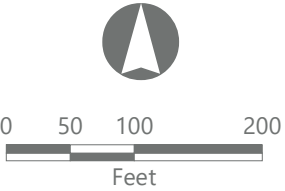


Figure 1. Previous Facility Layout



**South Ripley Solar Project**  
Town of Ripley, Chautauqua County,  
New York

- Shovel Test
- No Cultural Material
- Previous Facility Components
- Pole Location
  - Overhead Collection Line
  - - - Underground Collection Line
  - ▭ Access Road
  - ▭ Equipment Storage Container
  - ▭ Battery Energy Storage System
  - ▭ Fenceline
  - ▭ Substation
  - ▨ Laydown Yard
  - ▭ Planting Module
  - ▭ Emergency Response Pond
  - ▭ Limit of Grading
  - ▨ PV Panel Area
  - ▭ Facility Site



Prepared December 10, 2021  
Basemap: NYSDOP "2016" orthoimagery map



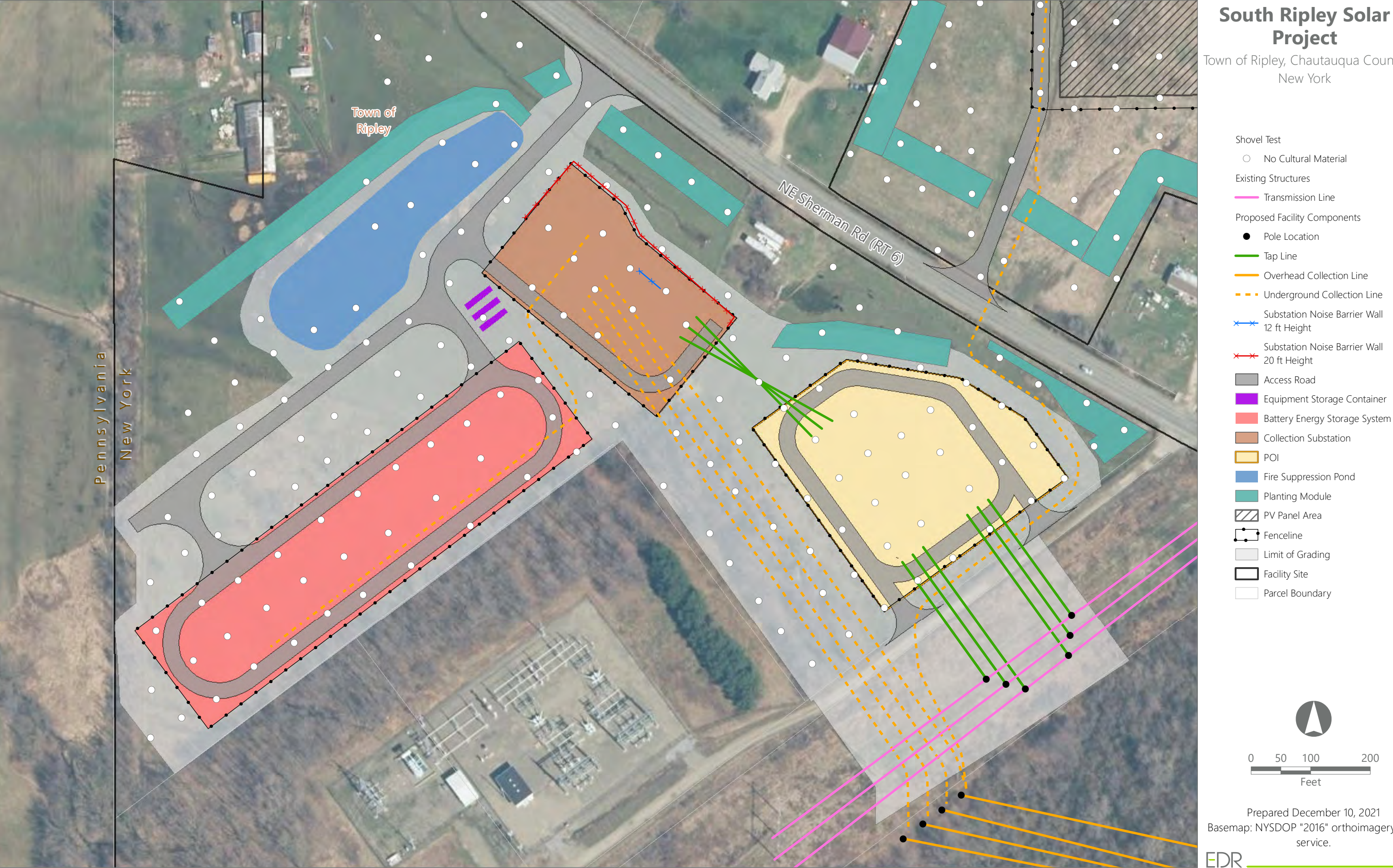
Subsequent to NYSHPO's review of cultural resources surveys for the Facility and finding of No Adverse Impact in September 2021 (NYSHPO, 2021a, 2021b), the New York Independent Systems Operators (NYISO) has determined that additional interconnection facilities are needed which involve a slight modification to the layout by adding a new stand-alone substation. The new substation will be very similar in size and equipment to the existing National Grid substation. This new POI will be located in the approximate location of the collection substation in the previous design and will have its own access road and fence line, as well as noise barrier walls. Planting modules and the fire suppression pond will also be reconfigured to accommodate the new POI..

The collection substation will be moved from the originally proposed location in the previous design to north of the Battery Energy Storage System (BESS) and it will tie into a new 3-breaker ring POI rather than the existing National Grid substation. It will contain the same equipment as before, but potentially in a different configuration or arrangement within the substation fence. This will require adjustments to fence line and access roads to both the collection substation and the BESS. The noise barrier walls will be located on the northeast and northwest sides of the collection substation and will be approximately 20 feet in height. The fire suppression pond will be located to the northwest of the collection substation. In addition, planting modules will be installed along the northeast and northwest sides of the interconnection facilities. The planting modules will be consistent with Module 4 of the planting modules described in the *Visual Impacts Minimization and Mitigation Plan* (EDR, 2021c), previously submitted to NYSHPO on August 13, 2021.

The locations of the components included as part of the proposed interconnection facilities are indicated on Figure 2.



Figure 2. Proposed Facility Layout





### **Evaluation of Impacts to Archaeological Resources**

EDR conducted Phase IB survey field work concurrent with the Facility layout design throughout 2020 and 2021. EDR submitted a *Phase IB Archaeological Survey Report* (21SR00269) in April 2021 (EDR, 2021a) and a *Supplemental Phase IB Archaeological Survey* (21SR00455) in July 2021 (EDR, 2021b). As noted in these reports, construction of the Facility will require soil disturbance. The Applicant has designed the Facility in order to minimize soil disturbance and potential impacts to archaeological resources. The Phase IB surveys identified a total of 15 archaeological sites, none of which were recommended to meet eligibility criteria for listing in the State/National Register of Historic Places (S/NRHP). On September 21, 2021, NYSHPO provided a review letter concurring with EDR's findings and stating that NYSHPO had no further archaeological concerns for the Facility (NYSHPO, 2021a).

The proposed revisions to the Facility layout are limited to parcels which have already been surveyed for archaeological resources. These parcels were subjected to shovel testing during the Phase IB archaeological survey, which did not yield any cultural material. None of the 15 archaeological sites identified during Phase IB survey are within or near the parcels affected by the revised layout. Likewise, no previously identified archaeological sites recorded in the NYSHPO Cultural Resources Information System (CRIS) are located within or near these parcels. Therefore, the revised Facility layout is not anticipated to result in any adverse effects on archaeological resources.

### **Evaluation of Impacts to Historic Resources**

EDR conducted a historic resources survey for the Facility in 2020 and submitted a *Historic Resources Survey Report* (20SR00498) to NYSHPO in February 2021 (EDR, 2021c). As noted in the *Historic Resources Survey Report*, the Facility will have no physical impacts to historic resources. The Facility's potential effect on a given historic resource would be a change (resulting from the introduction of photovoltaic panel arrays and related infrastructure) in the resource's visual setting. The historic resources survey addressed 2-mile and 5-mile radius study areas and an Area of Potential Effect (APE) for Indirect Effects based on a viewshed considering only the screening effects of topography, in accordance with the 2020 NYSHPO *Guidelines for Solar Facility Development Cultural Resources Survey Work* (NYSHPO, 2020). The survey evaluated a total of 11 historic resources. Of these, two were recommended to meet S/NRHP eligibility criteria:

- South Ripley Cemetery (USN 01322.000105), a 1.5-acre community burying ground with over 200 burials established in 1836; and
- The Sawyer-Swezey-Kehrli Farm Complex (USN 01322.000104), a farmstead with a Greek Revival-derived vernacular farmhouse and two barns.



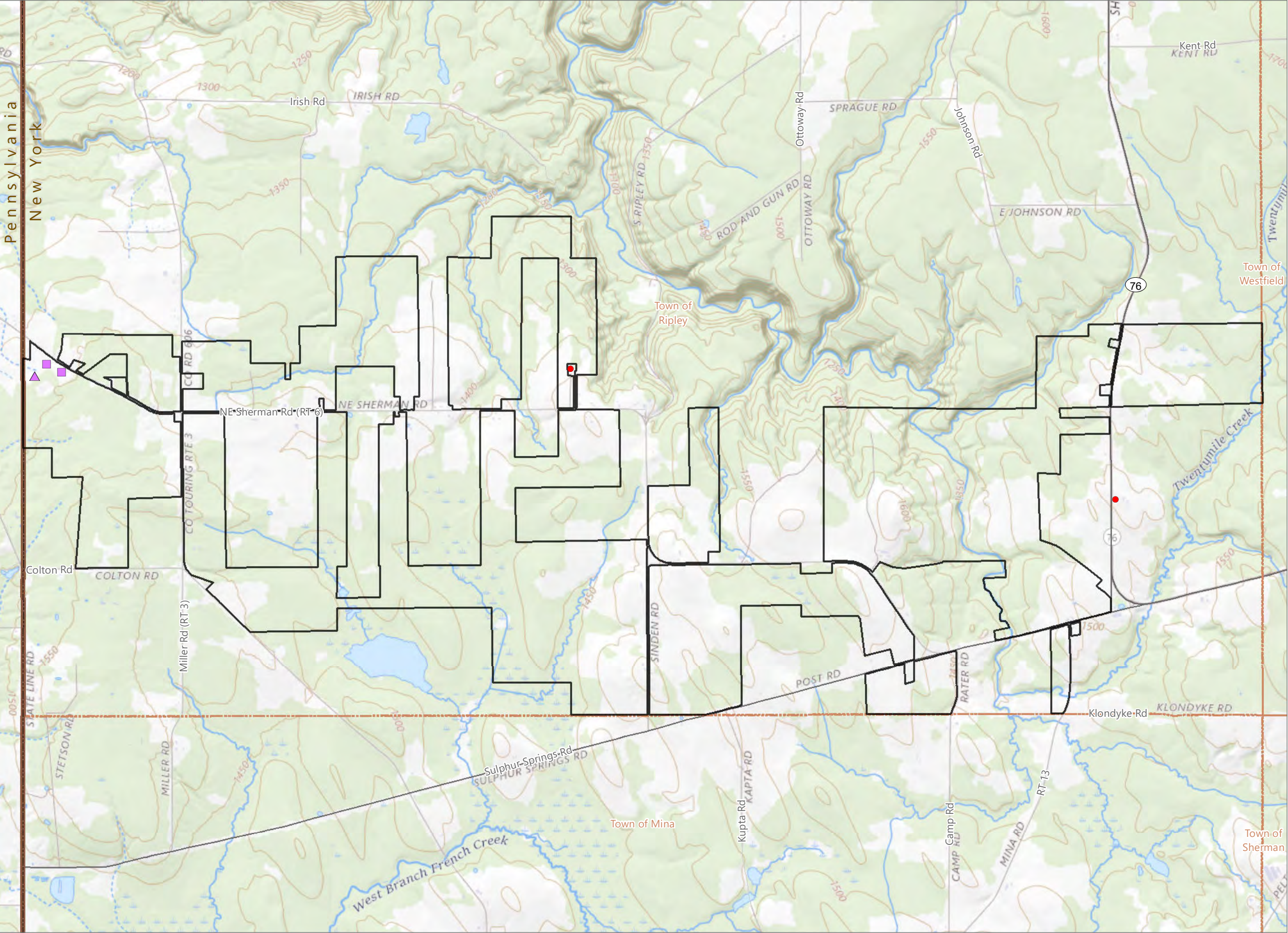
NYSHPO concurred with EDR's recommendations regarding these two resources and provided a review letter on October 15, 2021, finding that the Facility would have No Adverse Impact on the two resources provided that the Applicant follows the visual screening guidelines stated in the letter (NYSHPO, 2021b).

Following the submission of EDR's *Historic Resources Survey Report* for the Facility, NYSHPO updated the *Guidelines for Solar Facility Development Cultural Resources Survey Work* (NYSHPO, 2021c). For solar arrays covering more than 200 acres, the updated guidelines require survey of resources 50 years old or older within 1-mile of the solar array and which fall within an APE for Indirect Effects based on a GIS analysis of facility visibility considering the screening effects of topography and estimated existing vegetation heights. Therefore, for the purposes of identifying historic resources which may be indirectly affected by the Facility, the 2-Mile and 5-Mile Historic Resources Study Areas and APE for Indirect Effects implemented as part of the historic resources survey for the Facility are considered by EDR to be conservative. Potential indirect (visual) effects of Facility components greater than one mile from historic resources are expected to be minimal.

The proposed Facility layout revision will not substantially alter the type or scale of equipment associated with the POI substation. Per the previous layout and as described in the *Historic Resources Survey Report* (EDR, 2021c), the tallest features associated with the Facility were to have maximum heights of 70 feet or more. The tallest features associated with the revised interconnection facilities layout (lightning masts, a deadend structure between the POI and collection substations, and 3-pole transmission line structures) will have maximum heights between 70 and 85 feet. Furthermore, the Facility components affected by the revised layout are located approximately 2.3 miles from South Ripley Cemetery and approximately 5.0 miles from the Sawyer-Swezey-Kehrli Farm Complex (see Figure 3). Therefore, due to the limited nature of the layout revision and the significant distance between the POI substation and the two S/NRHP-eligible resources, the layout revision is not anticipated to result in any adverse effects on historic resources.

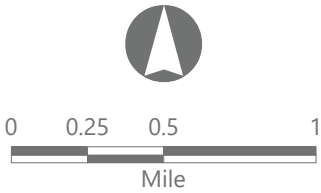


Figure 3. Location of S/NRHP-Eligible Historic Resources



**South Ripley Solar Project**  
Town of Ripley, Chautauqua County,  
New York

- S/NRHP-Eligible Historic Resource
- Proposed Facility Components
  - ▲ Battery Energy Storage System
  - Substation
  - Facility Site



Prepared December 10, 2021  
Basemap: Esri ArcGIS Online "USGS Topo"



## Summary and Conclusions

It is the opinion of EDR that the proposed revision to the Facility layout will not result in any adverse effects on cultural resources. The revision does not increase the archaeological APE that was evaluated in the Phase IB archaeological survey. In addition, the revised Facility components are located within parcels that were subjected to Phase IB survey, which yielded no cultural material. Regarding potential visual impacts to historic resources, it is the opinion of EDR that minor changes in the layout of components located more than two miles from S/NRHP-eligible historic resources will not substantially alter the visual setting of these resources. The proposed Facility layout revisions do not change the findings of previous cultural resources surveys conducted by EDR for the Facility.

Following your review of this memorandum, please provide EDR with a letter confirming your concurrence at your earliest convenience.

If you have any questions/concerns or would like to discuss the revised Facility layout described herein, please contact Kristen Olson at [kolson@edrdpc.com](mailto:kolson@edrdpc.com) or Doug Pippin at [dpippin@edrdpc.com](mailto:dpippin@edrdpc.com).



Kristen Olson  
Project Architectural Historian  
Environmental Design & Research



## REFERENCES CITED

Environmental Design & Research Landscape Architecture, Engineering, and Environmental Services (EDR). 2021a. *Phase IB Archaeological Survey Report, South Ripley Solar Project, Town of Ripley, Chautauqua County, New York*. Prepared for ConnectGen Chautauqua County LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY.

EDR. 2021b. *Supplemental Phase IB Archaeological Survey, South Ripley Solar Project, Town of Ripley, Chautauqua County, New York*. Prepared for ConnectGen Chautauqua County LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY.

EDR. 2021c. *Historic Resources Survey, South Ripley Solar Project, Town of Ripley, Chautauqua County, New York*. Prepared for ConnectGen Chautauqua County LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY.

EDR. 2021d. *Visual Impacts Minimization and Mitigation Plan, South Ripley Solar Project, Town of Ripley, Chautauqua County, New York*. Prepared for ConnectGen Chautauqua County LLC by Environmental Design & Research Landscape Architecture, Engineering & Environmental Services, D.P.C., Syracuse, NY.

New York State Office of Parks, Recreation, and Historic Preservation (NYSHPO). 2020. *Guidelines for Solar Facility Development Cultural Resources Survey Work*. New York State Historic Preservation Office, Waterford, NY. July 2020.

NYSHPO. 2021a. Re: DPS/ORES, South Ripley Solar Project/270MW/2000 acres, ~2000 acres within Town of Ripley, Chautauqua County, NY, 20PR03687, Siting Board Case 19-F-0560. Correspondence dated September 21, 2021. New York State Office of Parks, Recreation and Historic Preservation, Waterford, NY.

NYSHPO. 2021b. Re: Project 20 PR03687: South Ripley Solar Project/270MW/2000 acres (43INJ8OD1FB9). Correspondence dated September 16, 2021. New York State Office of Parks, Recreation and Historic Preservation, Waterford, NY.

NYSHPO. 2021c. *Guidelines for Solar Facility Development Cultural Resources Survey Work*. New York State Historic Preservation Office, Waterford, NY. May 2021.



**Parks, Recreation,  
and Historic Preservation**

**KATHY HOCHUL**  
Governor

**ERIK KULLESEID**  
Commissioner

January 11, 2022

Michael Cusack, Esq.  
Office of Renewable Energy Siting  
99 Washington Ave  
Albany, NY 12231

Re: ORES  
South Ripley Solar Project/270 MW/2000 acres  
Town of Ripley, Chautauqua County  
20PR03687

Dear Mr. Cusack:

The Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation (OPRHP) has reviewed the EDR Memorandum regarding the *Revised Facility Layout* (December 10, 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 Historic/Cultural resources.

Based upon this review, it is the opinion of the OPRHP that no historic properties including archaeological and/or historic resources, listed in or eligible for the New York State and National Registers of Historic Places will be adversely impacted by the proposed change in the facility layout.

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

Sincerely,

A handwritten signature in black ink that reads "Nancy Herter".

Nancy Herter  
Director, Technical Preservation Services Bureau