Appendix 9-2

**OPRHP Facility-Related Correspondence** 



4425-B Forbes Blvd. Lanham, MD 20706 T 301.306.6981 TRCcompanies.com

June 15, 2020

Daniel Mackay, Deputy Commissioner/Deputy SHPO New York State Office of Parks, Recreation and Historic Preservation Historic Preservation Field Services Bureau Peebles Island Resource Center, PO Box 189 Waterford, NY 12188-0189

### RE: Request for Consultation: Brookside Solar, LLC – Brookside Solar Project

Dear Mr. Mackay,

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

The Project may consist of tracking technology PV panels installed on low-profile racking systems mounted on poles driven directly into the ground. Inverters, which collect the electricity by the panels and convert it from direct current to alternative current, are spaced throughout the Project. The substation will take the power from the inverters and step it up to match the voltage of the electrical grid. A protective fence will surround the Project. Temporary laydown and staging areas will be used during construction to store and position vehicles and equipment. The final solar array specification, as well as locations of arrays, will be finalized as part of micro-siting efforts. Brookside Solar will interconnect to the power grid via a new point of interconnect (POI) adjacent to National Grid's 115 kilovolt (kV) Chateaugay substation located near the proposed Project Area.

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

#### **Archaeology**

The objective of the Phase IA study will be to identify the archaeological sensitivity of the Project Area through review of known archaeological data, archival data, site file information, and previous cultural surveys. The goal of this review will be to identify where archaeological field testing (Phase IB survey) may be needed to identify archaeological resources within the Area of Potential Effect (APE). For archaeological resources, the APE is defined as a location where significant ground disturbance may occur, including the construction of access roads, work spaces, buried electric collection lines, and electrical interconnection facilities. It is anticipated that the installation of posts for solar panels, as well as fencing, will be conducted by pile-driver or similar device and not constitute a significant ground disturbance.



Based on a review of CRIS, small portions of the Project Area are identified as archaeologically sensitive. Nine (9) previously recorded archaeological sites are located within a one-mile radius of the Project Area, one of which has been recorded within the Project Area (Figure 2; Table 1). No New York State Museum (NYSM) Areas or Sites are located within a one-mile radius of the Project Area. Three cemeteries are noted on CRIS: Thayer Corners Cemetery, Brayton Hollow Cemetery, and Saint Patricks Cemetery. All three are at least 0.4 miles from the Project Area.

Six archaeological surveys have been conducted within a one-mile radius, two of which are within the Project Area (09SR58793 and 15SR00791). Four (4) consultation projects have been conducted within a one-mile radius, two of which are within the Project Area (15PR03895 and 19PR02334).

Site Number	Site Type	NRHP-Eligibility	Distance from Project Area
03308.000003	Historic, industrial	Undetermined	0.66 mi east
03308.000062	Historic, domestic	Not Eligible	0.14 mi east
03308.000063	Historic, domestic	Not Eligible	0.03 mi south
03308.000089	Historic, unknown	Undetermined	0.28 mi southeast
03308.000092	Historic, transportation	Undetermined	Within Project Area
03308.000095	Historic, scatter	Undetermined	0.34 mi southeast
03308.000096	Historic, scatter	Undetermined	0.15 mi southeast
03345.000005	Historic, domestic	Eligible	0.92 mi east
03308.000042	Historic, transportation	Not Eligible	0.98 mi southeast

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

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

#### Historic Architecture

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

Based on a review of CRIS, there are two (2) previously recorded, above-ground architectural resources within the Project Area that have been determined not eligible for National Register of Historic Places (NRHP) listing (USNs 03307.000040 and 03308.000069). One NRHP-eligible cemetery is located on the edge of a parcel boundary (USN 03308.000079). Results of a CRIS search of a one-mile radius of the Project Area identified 21 previously surveyed architectural resources, of which nine are NRHP-eligible, 11 have been determined not eligible for NRHP listing, and one has an undetermined eligibility status (**Table 2**). An architectural survey of the area was completed in 2015—the Jericho Rise Wind Farm Historic Architectural Resources Survey.



USN	Name	Status
3308.000001	Chateaugay River Tunnel - Cemetery Road	Eligible
3308.000081	Brayton Hollow Cemetery - CR 35	Eligible
3308.000070	St. Patrick's Cemetery - 294 Cemetery Rd	Eligible
3308.000079	Atwater Cemetery - Martin Road	Eligible
3308.000017	farm complex - 162 Cemetery Rd	Eligible
3307.000046	Thayer Conners Cemetery - Route 11	Eligible
3307.000041	1-1/2 story cross-gabled frame residence - 5712 Route 11	Eligible
3308.000068	165 Cemetery Road - 165 Cemetery Road	Eligible
3307.000045	Bova House - 5717 Rt 11	Eligible
3308.000046	1-1/2 story residence - 228 Lewis Rd	Not Eligible
3308.000058	1-1/2 story gable front residence with side wing - 6083 US 11	Not Eligible
3308.000057	1-1/2 story gable front residence with side wing - 6009 US 11	Not Eligible
3308.000060	modular home w/gambrel roof barn - 6113 US 11	Not Eligible
3307.000044	15 East Road - 15 East Road	Not Eligible
3307.000040	2-story/5x2 bay residence - 5738 US 11	Not Eligible
3345.000042	1-1/2 story L-shaped Residence - 55 W. Main St	Not Eligible
3308.000069	1742 CR 23 - 1742 CR 23	Not Eligible
3308.000059	2-story side-gabled residence w/enclosed front porch - 6097 US 11	Not Eligible
3308.000061	Farmstead/queen-anne residence w/barn complex - 6130 Route 11 12920	Not Eligible
3308.000100	Village of Chateaugay wastewater treatment plant	Not Eligible
3345.000001	Farm of Gaits Hoit	Undetermined

#### Table 2: Previously Recorded Architectural Resources within One Mile of Project Area

The Project Area contains densely wooded areas, some cleared parcels, streams, private driveways, and two wind turbines. An abandoned railroad line passes through the southern portion of the Project Area. Review of contemporary aerial photography reveals approximately eight potential architectural resources within the Project Area, although some of these may not meet the 50-year age criterion. Except for the farm at the corner of U.S. 11 and Ketcham Road (USN 03307.000040) and the farm on the south side of County Highway 23 (USN 03308.000069), these potential resources have not previously been surveyed. Project design is not finalized and physical impacts to above-ground resources in the Project Area are unknown.

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

Based on previous surveys of large solar energy projects that used a two-mile Study Area approved by OPRHP, a two-mile radius Study Area may also be appropriate for this Project. The APE may be refined further to include areas that fall within the potential Project Area viewshed (i.e., those areas from which the Project is potentially visible) within the defined Study Area. The final Study Area and APE will be determined in



consultation with your office. A five-mile radius of the Project Area includes the Village of Chateaugay and the Village of Burke. A two-mile Study Area would also include these two villages.

#### **Recommendations**

#### Archaeology

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

#### Historic Architecture

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

We look forward to continued consultation with your office as well as submittal of detailed cultural resource work plans, as needed, in support of the licensing process. Should you have any questions or require additional information, please do not hesitate to contact me at (301) 276-8040, or tsara@trccompanies.com.

Sincerely yours,

An/Ana

Timothy R. Sara, RPA Program Manager, Cultural Resources

cc: Hayley Effler, TRC Brett Hastings, Geronimo Energy

file 373210.0000.0000

#### Attachments

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

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





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





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



ANDREW M. CUOMO Governor ERIK KULLESEID Commissioner

October 22, 2020

Jasmine Gollup Archaeologist/Laboratory Director TRC 4425-B Forbes Blvd Lanham, MD 20706

Re: PSC

Brookside Solar Project/100 MW/1212 acres Towns of Burke and Chateaugay, Franklin County, NY 20PR03997

Dear Jasmine Gollup:

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

We have reviewed the Phase IA Archaeological Survey report entitled "Phase IA Archaeological Study and Sensitivity Assessment, Brookside Solar Project, Franklin County, New York" prepared by TRC (September 2020; 20SR00475). The Archaeology Unit of the OPRHP has recently developed an archaeological sensitivity model and Phase IB testing protocol (see attachment). OPRHP recommends that the attached model and testing protocol be adopted for the Phase IB archaeological survey for this project.

If you have any questions, I can be reached at <u>Jessica.Schreyer@parks.ny.gov</u>.

Jessica E. Schreyen

Jessica Schreyer Scientist Archaeology



ANDREW M. CUOMO Governor ERIK KULLESEID Commissioner

SOLAR FACILITY Phase IA Archaeological Survey Recommendations/Sensitivity Model Project: Brookside Solar Project/100 MW/1212 acres PR#: 20PR03997 Date: 10/22/2020

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

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

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

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

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

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

Please provide the interested Indian Nations with a copy of the Phase IA report, including the Phase IB archaeological testing scope-of-work and request that the Indian Nations provide cultural resource comments to the Secretary of the Public Service Commission *(address enclosed)* and copy the SHPO/OPRHP. Indian Nation contact information is enclosed.

If you have any questions concerning archaeology, please contact Jessica Schreyer at <u>Jessica.Schreyer@parks.ny.gov</u>.

### Hon. Michelle L. Phillips

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

# St. Regis Mohawk Tribe (Federally Recognized)

Darren Bonaparte, Director Tribal Historic Preservation Office St. Regis Mohawk Tribe 71 Margaret Terrance Memorial Way Akwesasne, NY 13655 Phone: (518) 358-2272, ext. 2163 Email: darren.bonaparte@srmt-nsn.gov



ANDREW M. CUOMO Governor ERIK KULLESEID Commissioner

July 22, 2021

Tim Sara Program Manager, Cultural Resources TRC 4425-B Forbes Blvd Lanham, MD 20706

Re: PSC

Brookside Solar Project/100 MW/1212 acres Towns of Burke and Chateaugay, Franklin County, NY 20PR03997

Dear Tim Sara:

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 Archaeology Unit has reviewed the Phase IB Archaeological Survey report entitled "Phase IB Archaeological Survey, Brookside Solar Project, Franklin County, New York" prepared by TRC (July 2021, 21SR00421). The archaeological survey identified three historic-period archaeological sites: TRC-BS-1 (03307.000063), TRC-BS-2 (03308.000107), and TRC-BS-3 (03307.000064). OPRHP concurs with the report recommendations that TRC-BS-1, TRC-BS-2 and TRC-BS-3 are Not Eligible for inclusion in the National Register of Historic Places and no additional archaeological work is necessary.

Please note that these comments pertain only to archaeological resources. Please continue to consult with Dan Bagrow in the Survey and National Register Unit at <u>Dan.Bagrow@parks.ny.gov</u>. If you have any questions, I can be reached at Jessica.Schreyer@parks.ny.gov.

Jessica E. Schreyn

Jessica Schreyer Scientist Archaeology



KATHY HOCHUL Governor ERIK KULLESEID Commissioner

August 31, 2021

Tim Sara Program Manager, Cultural Resources TRC 4425-B Forbes Blvd Lanham, MD 20706

Re: PSC Brookside Solar Project/100 MW/1212 acres Towns of Burke and Chateaugay, Franklin County, NY 20PR03997

Dear Tim Sara:

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 pursuant to the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

We note that are several National Register eligible resources within the project APE, which are listed in the spreadsheet attached to this letter. Our office concurs with the list of eligible properties identified and recommended in the architectural survey. We understand that the proposed project will include installation of a 100 megawatt (MW) solar power facility on land in the Towns of Burke and Chateaugay in Franklin County, New York. The Project may consist of tracking technology PV panels installed on low-profile racking systems, a substation, protective fencing, and temporary laydown and staging areas.

In order for our office to continue this review, please provide the following additional documentation:

1. Provide and updated a visual impact survey map including all the National Register eligible historic properties indicated on the spreadsheet. Include an address or other identification key for each resource "triangle" on the map. Also include an initial assessment of the level of potential visual impact.

Our office can comment further on preferred photosimulation locations once the additional documentation is submitted and reviewed.

Documentation requested in this letter should be provided via our Cultural Resource Information System (CRIS) at https://cris.parks.ny.gov/. Once on the CRIS site, you can log in as a guest and choose "submit" at the very top menu. Go to "Other Options" and choose "submit new information for an existing project". You will need this project number and your e-mail address.

If you have any questions, I can be reached at (518) 268-2164.

March

Weston Davey Historic Site Restoration Coordinator Weston.davey@parks.ny.gov

Address	USN	Construction Date	Prior NRHP Status	Consultant-Recommended NRHP Status
Cook Road	3307.000043	ca. 1850	Eligible	Eligible
15 East Road	3307.000044	ca. 1856	Not Eligible	Eligible
5717 State Route 11	3307.000045	ca. 1856	Eligible	Eligible
Montgomery Road	3307.000047	ca. 1844	Eligible	Eligible
263 County Route 34	3307.000051	ca. 1902	Eligible	Eligible
474 Jamison Line Road	3307.000055	ca. 1850	Eligible	Eligible
1481 County Route 23	3307.00006	ca. 1990	Undetermined	Not Eligible
1207 County Route 23	3307.000065	ca. 1850	N/A	Eligible
333 Quarry Road	3307.000066	ca. 1920	N/A	Not Eligible
224 Cook Road	3307.000067	ca. 1890	N/A	Not Eligible
165 Cemetery Road	3308.000068	ca. 1895	Eligible	Eligible
294 Cemetery Road	3308.00007	ca. 1844	Eligible	Eligible
528 Hartnett Road	3308.000072	ca. 1840	Eligible	Eligible
Martin Road	3308.000079	ca. 1841	Eligible	Eligible
Chasm Road	3308.000081	ca. 1825	Eligible	Eligible
5940 State Route 11	3308.000102	ca. 1880	Undetermined	Not Eligible
29 Mill Street	3344.000001	ca. 1910	Eligible	Eligible
26 Mill Street	3344.000002	ca. 1890	Eligible	Eligible
9 Mill Street	3344.000003	ca. 1890	Eligible	Eligible
1027 West Main Street	3344.000005	ca. 1880	Eligible	Eligible
842 Depot Street	3344.000007	ca. 1905	Eligible	Eligible
1033 West Main Street	3344.000011	ca. 1900	Eligible	Eligible
1035 West Main Street	3344.000012	ca. 1910	Eligible	Eligible
162 Cemetery Road	3345.000001	ca. 1905	Undetermined	Not Eligible
45 Depot Street	3345.000002	ca. 1890	Eligible	Eligible
various addresses	3345.000065	N/A	Eligible	Eligible
14 Lake Street	3345.000083	ca. 1906	Eligible	Eligible
16 Church Street	3345.000084	ca. 1890	Eligible	Eligible
20 Church Street	3345.000085	ca. 1890	Eligible	Eligible
36 Depot Street	3345.000087	ca. 1895	Eligible	Eligible
43 Depot Street	3345.000088	ca. 1814	Eligible	Eligible
5 Franklin Street	3345.000089	ca. 1890	Eligible	Eligible
6 Franklin Street	3345.00009	ca. 1885	Eligible	Eligible
94 West Main Street	3345.000091	ca. 1850	Eligible	Not Eligible
214 East Main Street	3345.000092	ca. 1902	Eligible	Eligible
5 Church Street	3345.000094	ca. 1880	Eligible	Eligible



KATHY HOCHUL Governor ERIK KULLESEID Commissioner

October 21, 2021

Tim Sara Program Manager, Cultural Resources TRC 4425-B Forbes Blvd Lanham, MD 20706

Re: PSC

Brookside Solar Project/100 MW/1212 acres Towns of Burke and Chateaugay, Franklin County, NY 20PR03997

Dear Tim Sara:

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

We have reviewed your recent submission, dated October 15, 2021, for this project. This submission includes an updated visual impact assessment in response to our previous request for information.

Based on our review of the submitted documentation we are concerned with potential visibility of the solar installation from the National Register (NR) eligible St. Patrick's Cemetery (USN 03308.000070) and the NR eligible Atwater Cemetery (USN 03308.000079). In order our office to continue this review and fully evaluate potential visual impacts to the two historic cemeteries, please provide the following additional documentation:

- 1. Detailed site plans for the areas immediately adjacent to the cemeteries showing the proposed locations of the solar panels, access roads, fencing, and other equipment. Also indicate any existing or proposed vegetative buffers.
- 2. Photos taken from the resources toward the solar array locations.
- 3. A visual simulation from the St. Patrick's Cemetery (the letter notes that this will be included as part of the Exhibit 9 documentation).
- 4. A viewshed map that includes visibility with existing vegetation and buildings.

Documentation requested in this letter should be provided via our Cultural Resource Information System (CRIS) at https://cris.parks.ny.gov/. Once on the CRIS site, you can log in as a guest

and choose "submit" at the very top menu. Go to "Other Options" and choose "submit new information for an existing project". You will need this project number and your e-mail address.

If you have any questions, I can be reached at (518) 268-2164.

ha 12

Weston Davey Historic Site Restoration Coordinator Weston.davey@parks.ny.gov

From:	Steinwachs, Erin
To:	darren.bonaparte@srmt-nsn.gov
Cc:	Houtan.Moaveni@ores.ny.gov; Herter, Nancy (PARKS); Sara, Tim; Effler, Hayley
Subject:	Proposed Brookside Solar Project, Towns of Burke and Chateaugay, Franklin County, New York
Date:	Monday, November 29, 2021 8:56:00 AM
Attachments:	image002.png
	Reports zip

#### Mr. Bonaparte,

Brookside Solar, LLC (Brookside Solar) proposes to construct the Brookside Solar Project under Section 94-c of the New York Executive Law in the Towns of Burke and Chateaugay, Franklin County, New York. The Project will have a generating capacity of approximately 100 megawatts (MW) and occupy approximately 1,060 acres (please see the figure, below). TRC Companies, Inc. (TRC) has been retained by Brookside Solar to provide environmental review and licensing services in support of the Project and, on behalf of Brookside Solar, is conducting this outreach to the St. Regis Mohawk Tribe to provide information on the project.

Brookside Solar would welcome any information you may have on significant archaeological, religious, or cultural sites that may be of special importance to the St. Regis Mohawk Tribe within the Project area. In its 10/22/20 project review letter, the NY Office of Parks, Recreation and Historic Preservation (ORPHP) also requested that the Phase IA report and Phase IB report be provided to the St. Regis Mohawk Tribe for review. The OPRHP requested that any cultural resource comments offered by the St. Regis Mohawk Tribe should be provided to the Secretary of the Public Service Commission (now ORES) at the contact listed below, with copy to the OPRHP.

Mr. Houtan Moaveni Executive Deputy Director NY Office of Renewable Energy Siting 99 Washington Avenue Albany, NY 12231 Houtan.Moaveni@ores.ny.gov

Ms. Nancy Herter Director, Technical Preservation Bureau, State Archaeologist for Government Policy Office of Parks, Recreation and Historic Preservation Division for Historic Preservation P.O Box 189 Waterford, New York 12188-0189 nancy.herter@parks.ny.gov

We look forward to receiving your reply to this email acknowledging receipt of these reports. In the meantime, please do not hesitate to contact me at (240) 556-9181, <u>esteinwachs@trccompanies.com</u> or Tim Sara (301) 276-8040, <u>tsara@trccompanies.com</u>, should you require any additional information.

Attachments included in zipped folder:

- Phase IA Archaeological Study and Sensitivity Assessment, Brookside Solar Project, Franklin County, New York (TRC, September 2020)
- Phase IB Archaeological Survey, Brookside Solar Project, Towns of Burke and Chateaugay, Franklin County, New York (TRC, July 2021)



Erin Steinwachs, MA, RPA Archaeologist/Lab Director



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KATHY HOCHUL Governor ERIK KULLESEID Commissioner

January 10, 2022

Tim Sara Program Manager, Cultural Resources TRC 4425-B Forbes Blvd Lanham, MD 20706

Re: PSC

Brookside Solar Project/100 MW/1212 acres Towns of Burke and Chateaugay, Franklin County, NY 20PR03997

Dear Tim Sara:

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.

The Archaeology Unit has reviewed the Phase IB Archaeological Survey report addendum entitled "Phase IB Archaeological Survey, Brookside Solar Project, Franklin County, New York, Addendum I: Additional Phase IB Survey" prepared by TRC (December 2021, 22SR00013). No archaeological sites were identified by the survey, We recommend that no additional archaeological work is necessary.

Please note that these comments pertain only to archaeological resources. Please continue to consult with Weston Davey in the Technical Services Unit at <u>Weston.Davey@parks.ny.gov</u>. If you have any questions, I can be reached at Jessica.Schreyer@parks.ny.gov.

Jessica E. Schreyn

Jessica Schreyer Scientist Archaeology



KATHY HOCHUL Governor ERIK KULLESEID Commissioner

January 11, 2022

Tim Sara Program Manager, Cultural Resources TRC 4425-B Forbes Blvd Lanham, MD 20706

Re: PSC Brookside Solar Project/100 MW/1212 acres Towns of Burke and Chateaugay, Franklin County, NY 20PR03997

Dear Tim Sara:

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

We have reviewed your recent submission, dated December 15, 2021, for this project. This submission includes additional documentation illustrating the proposed solar arrays to address concerns with potential impacts to the historic St. Patrick's and Atwater Cemeteries.

Based on this review, it is the opinion of the SHPO that the proposed project will have No Adverse Impact to historic and cultural resources.

If you have any questions, I can be reached at (518) 268-2164.

12-

Weston Davey Historic Site Restoration Coordinator Weston.davey@parks.ny.gov