



4425 Forbes Boulevard  
Lanham, Maryland 20706

Main 301-306-6981  
Fax 301-306-6986

April 17, 2019

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

**RE: Request for Consultation: Proposed Watkins Glen Solar Energy Center, Town of Dix, Schuyler County, New York**

Dear Ms. Pierpont,

Watkins Glen Solar Energy Center, LLC, (Watkins Glen Solar Energy Center) proposes to construct the Watkins Glen Solar Energy Center (the Project), under Article 10 of the Public Service Law (PSL). The Project will have a generating capability of 50 megawatts (MW) of power located in the Town of Dix, Schuyler County, New York (**Figures and 1 and 2**).

Project facilities will include commercial-scale solar arrays, access roads, buried (and possibly overhead) electric collection lines, a Project collection substation, and a point of interconnection (POI) switchyard, located within an approximate 770-acre site (the Project Area). The POI switchyard will be transferred to New York State Electric and Gas (NYSEG) to own and operate. The proposed collection substation and POI switchyard will be located on land south of the solar arrays within the Project Area, adjacent to the existing Bath-Montour Fall 115 kV transmission line.

TRC Environmental Corporation (TRC) has been retained by Watkins Glen Solar Energy Center, LLC to provide environmental review and licensing services in support of the Project. The purpose of this letter is to initiate formal consultation with your agency 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) that will be required in support of Project review. To that end, TRC plans to conduct Phase IA and IB (if required, as determined in consultation with OPRHP) archaeological studies and a historic architectural survey in advance of proposed construction to identify 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) may be needed to identify archaeological resources within the Area of Potential Effect (APE). Based on a review of CRIS, there are no known previously recorded archaeological sites within the Project Area or within a one-mile radius of the Project Area (**see Figure 2**). For archaeological resources, the APE is defined as a location where significant ground disturbances 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, would be conducted by pile-driver or similar

device and not constitute a significant ground disturbance. Should Phase IB survey be determined necessary, Watkins Glen Solar Energy Center will submit a detailed Research Design for your agency's review and concurrence prior to initiation of field studies.

### **Historic Architecture**

The APE for above-ground structures 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 is determined in relation to the scale of the undertaking, including new construction, improvements, or demolitions to be made during operation and maintenance of the Project. Based on a review of CRIS, there are no known previously recorded historic architectural resources within the project area. Three previously recorded resources are located within a one-mile radius, including one resource to the immediate north and two to the northwest. All three resources have been determined ineligible for inclusion in the NRHP. One NRHP-eligible building district (Watkins Glen State Park) is noted to the north. In addition, review of Project maps indicates the Project Area is known to contain one farm complex and eight structures; however, the Project is expected to have no physical impacts to above-ground resources.

The APE for indirect (visual, atmospheric, or audible) effects includes those areas removed in distance, where Project components will be visible and where there is a potential for a significant visual effect. Per the guidelines set forth in 16 NYCRR § 1000.2 (ar), the study area to be used for above-ground resource analysis is anticipated to comprise those areas within five miles of the proposed Project and which fall within the potential Project viewshed (i.e., those areas from which the Project is potentially visible). The final APE will be determined in consultation with the OPRHP. The five-mile-radius above-ground resource study area for the Project includes parts of the towns of Orange, Dix, Montour, and Reading, and the Village of Montour Falls in Schuyler County, and the town of Catlin in Chemung County.

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@trcsolutions.com](mailto:tsara@trcsolutions.com).

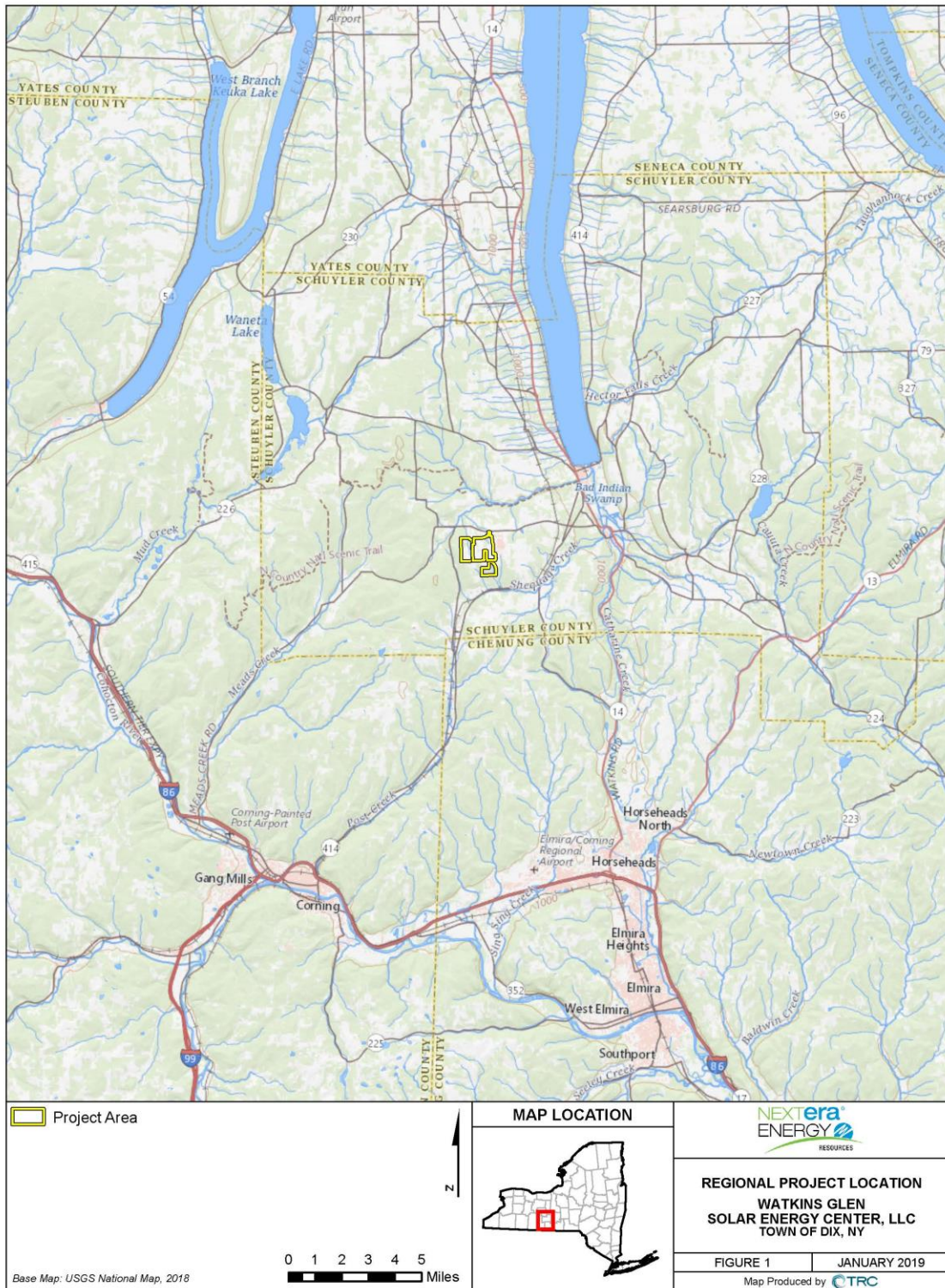
Sincerely yours,



Timothy R. Sara, RPA  
Program Manager, Cultural Resources

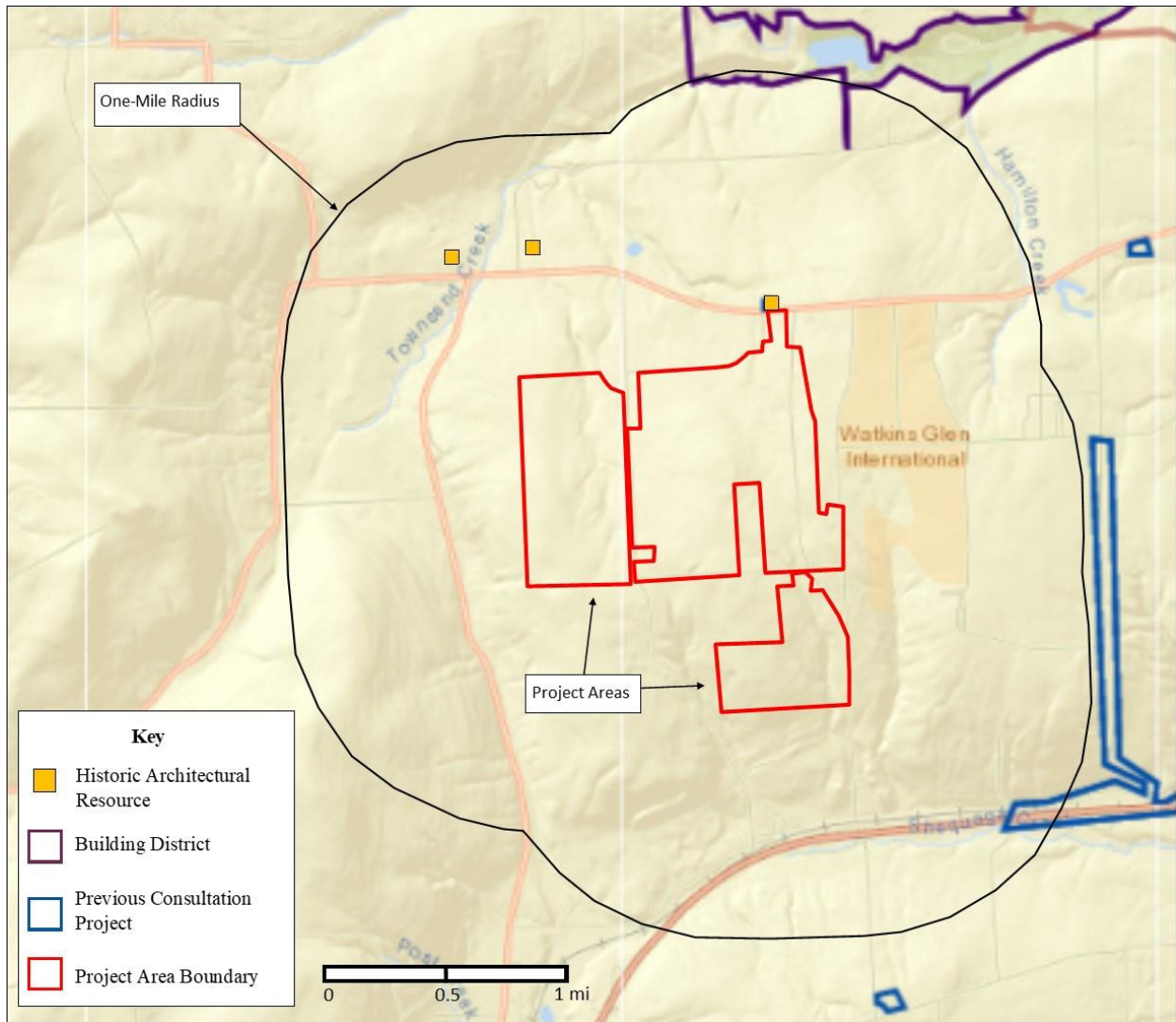
cc: Michael Dowling, NextEra Energy Resources, LLC  
William Boer, NextEra Energy Resources, LLC  
Samantha Kranes, TRC

file 276517.0000.0000



**Figure 1: General project location in Schuyler County, New York**





**Figure 2: Detail of Draft Project Area superimposed over OPRHP Cultural Resources Information System (CRIS) Webviewer (accessed January 2019).**

**Project 19PR03644: Watkins Glen Solar Energy Center/50MW/770-acre (MHIPVI17S666)**

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

**Review Responses**

<b>Reviewer</b>	<b>Review Type</b>	<b>Response</b>
Tim Lloyd	Archaeology	We have reviewed the submitted materials and concur with your plan to conduct a Phase IA archaeological investigation. Also, please submit a site plan, as soon as it is available. Please review the specific information request (s) below and click the Process button to respond to each request.
Erin Czernecki	Survey and Evaluation	In order for SHPO to complete our evaluation of the historic significance of all buildings/structures/districts within or adjacent to your project area, we need further information. Please review the specific information request(s) below and click the Process button to respond to each request.



**Parks, Recreation,  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

October 18, 2019

Ms. Jasmine Gollup  
Archaeologist  
TRC Companies  
4425-B Forbes Boulevard  
LANHAM, MD 20706

Re: PSC  
Watkins Glen Solar Energy Center  
Town of Dix, Schuyler County, NY  
19PR03644

Dear Ms. 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 report entitled "Phase IA Archaeological Survey and Sensitivity Assessment, Watkins Glen Solar Energy Center, Town of Dix, Schuyler County, New York" (October 2019). OPRHP concurs with the report's recommendations regarding areas of relative archaeological sensitivity (Report Figure 4-6). We further concur with the report's recommendation that Phase IB archaeological testing be conducted where significant proposed ground disturbances fall within areas characterized as moderate or high archaeological sensitivity.

If further correspondence is required regarding this project, please refer to the OPRHP Project Review (PR) number noted above. If you have any questions, I can be reached at 518-268-2186.

Sincerely,

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

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

via e-mail only

cc M. Hyland, M. Higgins, N. Schnyder, N. Chaudari, S. Kranes, S. Metivier, T. Sara

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**Division for Historic Preservation**

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

Attachment D, OPRHP Consultation

Document	Watkins Glen Solar OPRHP Initial Cons letter TRC.pdf	Initial consultation letter April
18, 2019	19PR03644.001 05/30/2019	



4425 Forbes Boulevard  
Lanham, Maryland 20706

Main 301-306-6981  
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April 17, 2019

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

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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@trcsolutions.com](mailto:tsara@trcsolutions.com).

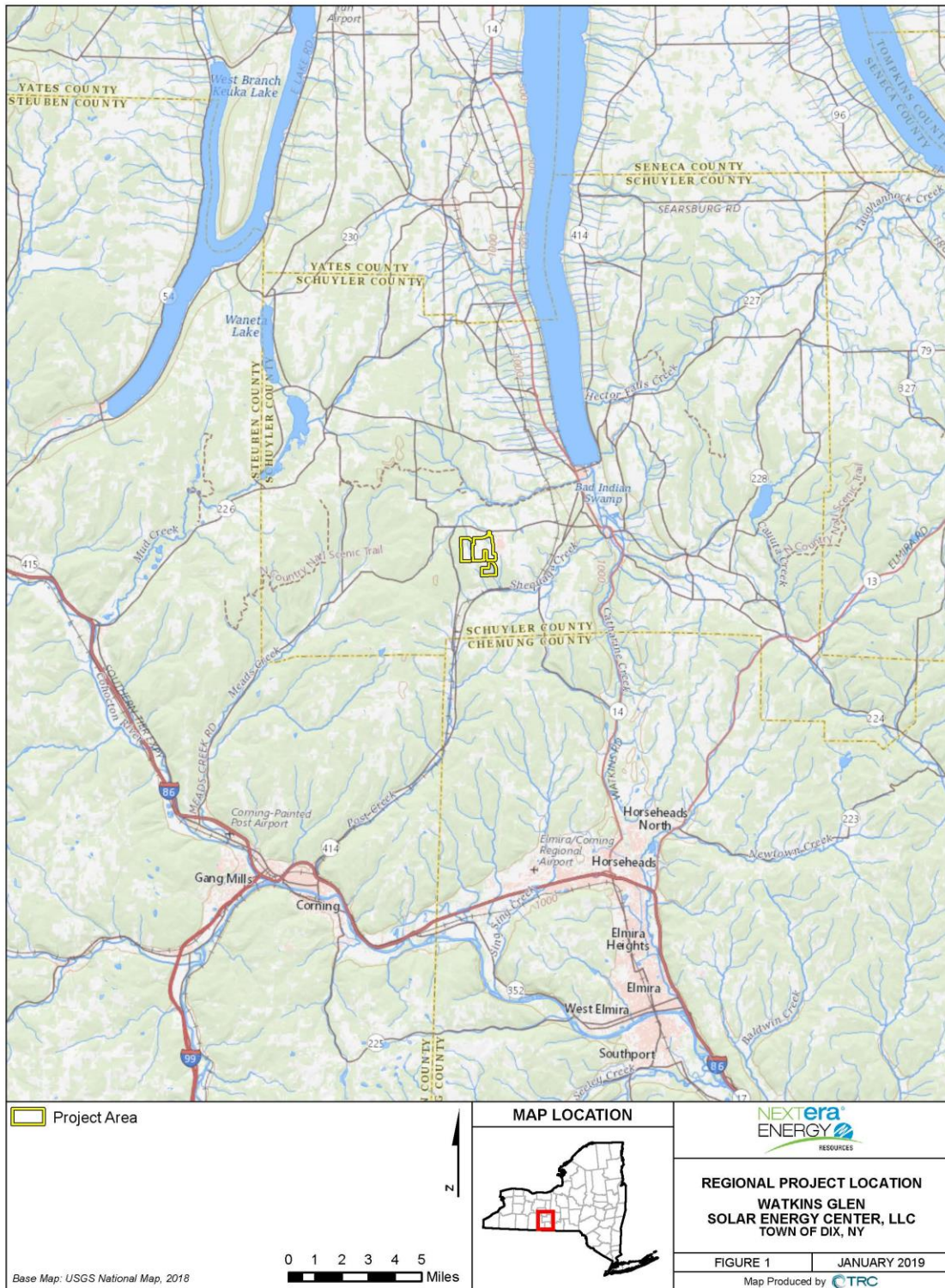
Sincerely yours,

A handwritten signature in black ink, appearing to read "T. Sara", with a stylized flourish at the end.

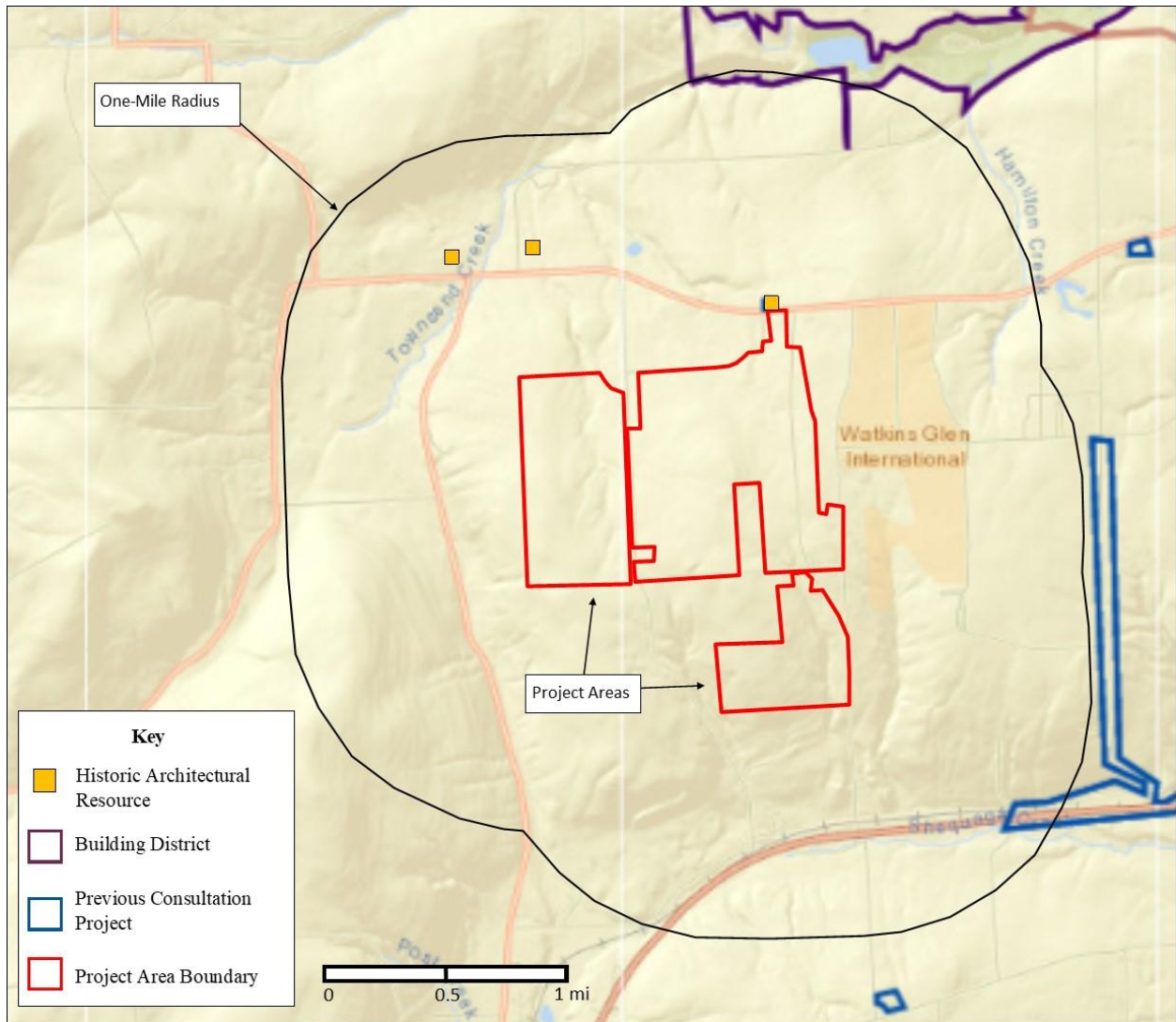
Timothy R. Sara, RPA  
Program Manager, Cultural Resources

cc: Michael Dowling, NextEra Energy Resources, LLC  
William Boer, NextEra Energy Resources, LLC  
Samantha Kranes, TRC

file 276517.0000.0000



**Figure 1: General project location in Schuyler County, New York**



**Figure 2: Detail of Draft Project Area superimposed over OPRHP Cultural Resources Information System (CRIS) Webviewer (accessed January 2019).**



## Consolidated Response - Submission Trekker Request

Email P9E57BLQPUAB 01/09/2020 Erin Czernecki Jasmine Gollup

Submission Status

View and/or Address a Response

Project 19PR03644: Watkins Glen Solar Energy Center/50MW/770-acre (P9E57BLQPUAB)

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

Review Responses		
Reviewer	Review Type	Response
Kathy Howe	Survey and Evaluation	In order for SHPO to complete our evaluation of the historic significance of all buildings/structures/districts within or adjacent to your 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						
Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
Processed	Kathy Howe	Survey and Evaluation	Request a New Trekker Survey			Please provide an architectural survey

## Email Trekker Request 01/13/2020

[EXTERNAL] SHPO Requested Submission Accepted for Consultation Project: 19PR03644

New York State Parks CRIS Application <cris.web@parks.ny.gov>

To: Gollup, Jasmine; Sara, Tim; Krane, Samantha; Hyland, Matthew; natasha.snyder@nexteraenergy.com; noreena.chaudari@dps.ny.gov; steven.v.metivier@usace.army.mil; michael.higgins@dec.ny.gov; VanOpstal, Laura

Mon 1/13/2020 9:42 AM

TRC Phish Alert

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

This message is a notification from the New York State Historic Preservation Office (SHPO) through its Cultural Resource Information System (CRIS). Requested submission DEYSNFYH4UK9 has been accepted for project 19PR03644 (Watkins Glen Solar Energy Center). Its new submission number is 19PR03644.004.

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 19PR03644.001 (response token MHIPV17S666): *Please provide an architectural survey*

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

Sincerely,

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

01/09/2020 19PR03644.003 Manual Request

request a trekker survey Kathy Howe (Survey and Evaluation)

## 01/16/2020 SHPO Trekker Survey (20SR00015) Approval and Request for Survey Report

**Review a Submission Consolidated Response**

**View and/or Address a Response**

**Project 19PR03644: Watkins Glen Solar Energy Center/50MW/770-acre (YF1S4UNUFYNF)**

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

Review Responses		
Reviewer	Review Type	Response
Chelsea Towers	Survey and Evaluation	In order for SHPO to fully review and process the survey that was submitted, we need further information. Please review the specific information request(s) below and click the Process button to respond to each request.

Information Requests						
Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
Information Requested	Chelsea Towers	Survey and Evaluation	Request a New Attachment for an Existing Survey	Watkins Glen Solar Energy Center Project Architectural Survey, Town of Dix, Schuyler County (20SR00015)	Attachment	Please upload the Survey Report after the Trekker Surveys are complete.

Attachments						
Attachment	Reviewer	Review Type	Type	Name	Description	
No Attachment Records						

## Consolidated Response – Submission: More information on Watkins Glen Race Track

Email 18LFUFQ9S9XF 03/16/2020

Daniel H. Boggs

Jasmine Gollup

**Submission Status**

Review Responses		
Reviewer	Review Type	Response
Daniel H. Boggs	Survey and Evaluation	In order for SHPO to complete our evaluation of the historic significance of all buildings/structures/districts within or adjacent to your 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						
Status	Reviewer	Review Type	Request Type	Request Entity	Request Item	Request Description
Information Requested	Daniel H. Boggs	Survey and Evaluation	Request a New Attachment, Photo, or Survey for this Consultation Project		Attachment	We note that the project area is near Watkins Glen International race course but this parcel was not included in the submitted trekker survey. Please provide information on whether any portion of the project may potentially be visible from any portion of the race course. If visibility potential exists, please provide information on the course, its history and significant buildings. Watkins Glen International race course appears to be NR eligible.