



Baron Winds Project

Case No. 15-F-0122

1001.20 Exhibit 20

Cultural Resources

TABLE OF CONTENTS

EXHIBIT 20	CULTURAL RESOURCES	1
(a)	Archaeological Resources	1
(1)	Summary of Impacts and Avoidance/Minimization Measures	1
(2)	Phase 1A Cultural Resources Study	3
(3)	Phase 1B Cultural Resources Study	5
(4)	Phase 2 Study	7
(5)	Archaeological Material Recovered During Cultural Resources Studies	7
(6)	Unanticipated Discovery Plan	8
(b)	Historic Resources	8
(1)	A Complete Historic Architectural Survey	8
(2)	A Summary of the Nature of the Probable Impact of Facility Construction and Operation on Any Historic Resources.	16
REFERENCES	38

EXHIBIT 20 CULTURAL RESOURCES

Consistent with 16 NYCRR §1001.20 and the New York State Office of Parks, Recreation, and Historic Preservation's (NYSOPRHP) *Guidelines for Wind Farm Development Cultural Resources Survey Work* (the "SHPO Wind Guidelines") (NYSOPRHP, 2006), the Applicant consulted with the NYSOPRHP to develop the scope and methodology for cultural resources studies for the Facility. To date, formal consultation with NYSOPRHP has included initiating Facility review and consultation through NYSOPRHP's Cultural Resources Information System (CRIS) website¹ and submission of technical reports/work plans. These submissions are described in greater detail below.

(a) Archaeological Resources

(1) Summary of Impacts and Avoidance/Minimization Measures

A Phase 1B archaeological survey was conducted which identified 22 archaeological resources: 13 historic period and nine pre-contact Native American sites. Sixteen of these sites meet or potentially meet the criteria for listing on the State/National Register of Historic Places (S/NRHP) and six do not meet the criteria for listing on the S/NRHP. The archaeological resources identified during the Phase 1B survey are summarized in Table 20-1 of this Exhibit and are discussed in detail in the Phase 1B Archaeological Survey Report, which is included in this Application as Appendix CC. All archaeological resources which meet the criteria for listing on the S/NRHP have been avoided by Facility design.

The mapped locations of all archaeological sites which meet or potentially meet the criteria for listing on the S/NRHP within approximately 100 feet (31 meters) of proposed Facility-related impacts will be identified as "Environmentally Sensitive Areas" or similar on Facility construction drawings, and marked in the field by construction fencing with signs that restrict access. These measures should be adequate to ensure that impacts to archaeological resources are avoided.

No potentially significant archaeological resources are located within the Facility's Area of Potential Effect (APE) for Direct Effects. If a potentially significant archaeological resource is subsequently identified within the APE, the Applicant will attempt to relocate the Facility components to avoid impacts to the resource. If the impacts cannot be avoided, then a Phase 2 archaeological site investigation (in consultation with NYSOPRHP) will be conducted. However, since the Facility layout is being intentionally sited to avoid impacts to significant archaeological resources, it is anticipated that no Phase 2 site investigations will be necessary.

¹ NYSOPRHP's Cultural Resources Information System is accessible at: <http://www.nysparks.com/shpo/online-tools/>.

If unanticipated archaeological resources are encountered during construction, the Facility's Unanticipated Discovery Plan will include provisions to stop all work in the vicinity of the archaeological finds until those resources can be evaluated and documented by a Registered Professional Archaeologist (RPA). The Unanticipated Discovery Plan is attached to this Application as Appendix DD.

With the adoption of these measures, the proposed Baron Winds Facility is not anticipated to impact any significant archaeological resources.

Table 20-1. Summary of Archaeological Sites Identified During the Phase 1B Survey

Site Name	Description	Location	Potential Impacts
Burns Site 1	Two historic-period foundations and agricultural equipment	Approximately 2,400 feet west of the west end of Van Keuren Road and approximately 2,100 feet north of U.S. Interstate 86	Not impacted by current layout
C5.09 Pre-contact Isolate	Pre-contact projectile point	Approximately 650 feet west of Campbell Road; approximately 10 feet southwest of Turbine 14.	Intersected by Project APE (Turbine 14)
Canfield Road Historic Site	Historic-period foundation and debris scatter	Approximately 2,250 feet south of Canfield Road and approximately 3,000 feet west of Jones Road.	Not impacted by current layout.
Conderman Pre-contact Site	Pre-contact lithic scatter	Approximately 50 feet east of Conderman Road and approximately 1,200 feet north of intersection between Conderman and Huginor Roads.	Not impacted by current layout.
D1 Pre-contact Isolate	Isolated pre-contact Flake	Approximately 500 feet north of Avery Road.	Not impacted by current layout
Dutch Street Foundation	Historic-period farmstead	Immediately south of Dutch Street and approximately 1,200 feet east of intersection between Dutch Street and Jones Road.	Not impacted by current layout
F1 Historic Scatter	Historic-period debris scatter	Approximately 730 feet northeast of terminus of Walters Road	Not impacted by current layout
H2.56 Isolate	Pre-contact bifacial core	Approximately 600 feet north of Dutch Street/County Road 54.	Intersected by Project APE (Turbine 93)
H3 Historic Site	Historical debris scatter	Immediately northeast of intersection between Dutch Street and Jones Road.	Not impacted by current layout
H3 Pre-contact Site 1	Pre-contact lithic scatter	Approximately 50 feet north of Dutch Street/County Road 54 and approximately 550 feet east of Jones Road.	Not impacted by current layout
I4 Pre-contact Site	Pre-contact lithic scatter	Approximately 500 feet east of Babcock Road. Approximately 2,900 feet southwest of State Route 21	Not impacted by current layout.
Mack School Pre-Contact Site	Pre-contact lithic scatter	Approximately 250 feet east of Mack Road and approximately 1,300 feet north of intersection between Mack Road and State Highway 21.	Not impacted by current layout.
MDS 6 Historic Site	Historic-period trash dump	Approximately 750 feet southwest of the intersection between Potter Hill Road and Rex Road	Not impacted by current layout.
MDS 7 Historic Site	Historic-period farmstead (demolished)	Immediately north of Lake Hollow Road and approximately 1,700 feet north of the intersection between Potter Hill Road and Rex Road	Not impacted by current layout
MDS 8 Historic Site	Historic-period farmstead	Approximately 70 feet north of Loveland Road and approximately 2,100 feet north-northeast of the intersection between Loveland Road and Potter Hill Road	Not impacted by current layout

Site Name	Description	Location	Potential Impacts
MDS 20 Historic Site	Historic-period farmstead	Immediately north of Holmes Road and approximately 2,500 feet west of intersection between Holmes Road and Babcock Road	Not impacted by current layout
MDS 27 Barn Foundation Site	Historic-period barn foundation	Immediately south of Avery Road and approximately 2,000 feet southwest of intersection between Avery Road and Basted District Road	Not impacted by current layout
MDS Pusharound Site	Historic-period farmstead (demolished)	Immediately north of the eastern terminus of Walters Road	Not impacted by current layout
R & V Evaporator Site	Historic-period sugaring locus	Approximately 2,950 feet northwest of intersection between Dutch Street and Jones Road	Not impacted by current layout
Van Keuren Pre-contact Site 1	Isolated pre-contact flake	Approximately 2,800 feet northwest of intersection between Van Keuren Road and Rose Road	Currently impacted by Turbine 50
Van Keuren Pre-contact Site 2	Pre-contact lithic scatter	Approximately 1,200 feet northwest of intersection between Van Keuren Road and Rose Road	Potentially impacted by Turbine 51
Walters Road Site	Historic-period multi-family farmstead	Between approximately 600 and 1,000 feet north of the eastern terminus of Walters Road	Not impacted by current layout

(2) Phase 1A Cultural Resources Study

EDR prepared a Phase 1A Archaeological Survey & Phase 1B Work Plan (included in this Application as Appendix FF), which was submitted through the CRIS website on July 5, 2016 and is summarized below. On July 25, 2016, NYSOPRHP provided a response to the Phase 1A Archaeological Survey Report and Phase 1B Fieldwork Plan, which concurred with the Phase 1B Fieldwork Plan and APE for Direct Effects proposed by EDR (Perazio, 2016). A copy of this NYSOPRHP correspondence is included in Appendix CC of this Application.

The purpose of the Phase 1A Archaeological Resources Survey and Phase 1B Fieldwork Plan was to: 1) define the Facility's APE relative to archaeological resources based on the anticipated area of disturbance for Facility components; 2) determine whether previously identified archaeological resources were located in the APE; and, 3) propose a methodology to identify archaeological resources within the APE, evaluate their eligibility for the S/NRHP, and assess the potential effect of the Facility on those resources. Following review and approval of this work plan by NYSOPRHP, a Phase 1B archaeological survey was conducted following the methodology outlined in the Fieldwork Plan. The Phase 1A report and Phase 1B Fieldwork Plan were prepared by professionals who satisfy the qualification criteria per the Secretary of the Interior's Standards for archaeology (36 CFR Part 61) and in accordance with the SHPO Wind Guidelines (NYSOPRHP, 2006) and applicable portions of NYSOPRHP's Phase 1 Archaeological Report Format Requirements (NYSOPRHP, 2005).

Relative to the potential for archaeological sites to be located within the Facility Site, the results of the Phase 1A Archaeological Resources Survey for the proposed Facility can be summarized as follows:

- There are two previously reported archaeological sites located within approximately 1 mile of the Archaeological Study Area, as summarized in Table 3 of the Appended Phase 1A Archaeological Report:
 - The Malter Site (Unique Site Number [USN] 10113.000008) consists of a historic debris scatter and foundation which represent the remains of a pre-1918 farmstead. The site was recommended as not eligible for listing on the S/NRHP by the Public Archaeology Facility, State University of New York at Binghamton (PAF) (PAF, 2006a). The site occurs within the Archaeological Study Area; however, based on current Facility design, the site does not occur within the APE for Direct Effects and will not be impacted by any Facility-related activities. However, regardless of potential impacts, the site is not eligible for listing on the S/NRHP so there will be no effect to significant resources.
 - The Indian Burial site (USN 10109.000024) consists of a possible Native American burial site located outside the Archaeological Study Area (but within 1-mile of the Archaeological Study Area) noted on an 1889 map of the James Cleland Farm in the Town of Cohocton. As described in further detail in Section 2.4 of the Appended *Phase 1A Archaeological Survey and Phase 1B Work Plan* (Appendix FF), the site may actually represent a historic Euroamerican grave from the 19th century (Folts, 1999). This site is outside both the Archaeological Study Area and Facility Site and will not be impacted by any Facility-related activities.
- Sensitivity for pre-contact Native American archaeology within the Facility Site is considered to be low, given the low density of previously recorded archaeological sites in the vicinity and the low density of pre-contact archaeological sites identified during surveys in similar environments (i.e., uplands within the Allegheny Plateau physiographic province in western New York).
- Sensitivity for historic archaeology is considered to be high in proximity to structures identified on historic maps (Figures 6-8 of the appended Phase 1A Archaeological Survey and Phase 1B Work Plan [Appendix FF]). Archaeological resources associated with these sites could include foundations, structural remains, artifact scatters, and/or other features. The remainder of the Facility away from historic map-documented structures is considered to be of low sensitivity for historic archaeology.

In addition, the Phase 1A report acknowledges that proposed construction of the Facility will include ground-disturbing activities with the potential to impact archaeological resources. The APE for Direct Effects (i.e., archaeological resources) includes all areas of soil disturbance associated with proposed turbine pad and assembly areas, access roads, buried and overhead collection lines, meteorological towers, laydown and staging

areas, operations and maintenance facilities, and substations. Any archaeological sites located within the Facility Site but not within the limits of disturbance for the proposed Facility will not be affected by the Facility.

(3) Phase 1B Cultural Resources Study

A Phase 1B Archaeological Survey was conducted between October 10 and November 17, 2016, as well as on January 19, April 26 through 28, May 24 through 26, and June 1, 2017 to determine whether archeological sites were located in areas of ground disturbance for the proposed Facility. The Phase 1B survey was conducted under the supervision of a RPA in a manner consistent with the SHPO Wind Guidelines (NYSOPRHP, 2006), and the Phase 1B report has been prepared in accordance with NYSOPRHP's Phase 1 Archeological Report Format Requirements (NYSOPRHP, 2005).

As indicated above, the scope and methodology for the Phase 1B Archaeological Survey was proposed in the Phase 1A Archaeological Resources Survey & Phase 1B Fieldwork Plan, which was submitted to NYSOPRHP on July 5, 2016 and approved by NYSOPRHP on July 25, 2016. The SHPO Wind Guidelines suggest following the approach detailed in *Archeological Investigations in the Upper Susquehanna Valley, New York State* (Funk, 1993a, 1993b) in the design of archaeological surveys for wind projects. The approach involves identification of broad environmental zones with local habitat (or landscape class) subdivisions. The archaeological survey subsequently includes intensive sampling of selected areas within each of the identified landscape classes, rather than undertaking an even distribution of sampling throughout the APE. Following this approach, EDR used Geographic Information System (GIS) software to identify landscape classes within the Facility Area and proposed an archaeological sampling strategy. The Phase 1A Archaeological Survey and Phase 1B Work Plan summarizes the methodology used for the GIS analysis and presents the landscape classification analysis in tabular and graphical formats (see Appendix FF).

The primary methods used during the archeological survey included pedestrian surface surveys (in active agricultural settings where ground-surface visibility was greater than 80%); shovel tests (in hayfields, forest, and shrubland areas); and pedestrian reconnaissance (in steeply sloped areas). The locations of areas selected for intensive archaeological sampling within the archaeological APE were determined in the field using professional judgment under the direction of a RPA. Two areas were prioritized during the selection process for shovel testing: (1) areas where proposed Facility components are located in proximity to structures depicted on historic maps; and, (2) areas deemed to have high sensitivity for pre-contact Native American archaeological material. The latter included flat areas of well-drained soils in close proximity to perennial streams or large wetlands.

This Phase 1B archaeological survey was completed in accordance with the fieldwork plan and research design previously reviewed and approved by NYSOPRHP (EDR, 2016; Perazio, 2016; see Appendices A and B in the Phase 1B Archaeological Survey Report [Appendix CC]). At the time that the Fieldwork Plan was prepared, the layout and assumptions regarding temporary disturbance resulted in an archaeological APE of 808.6 acres. Subsequent to the preparation of the Fieldwork Plan, the Facility layout was revised and assumptions regarding the limits of temporary disturbance during construction were refined for some Facility components (see Sections 1.2 and 2.3 of the *Phase 1B Archaeological Survey* [Appendix CC]).

Based on the revised Facility layout and impact assumptions, the archaeological APE for the Facility was reduced to 470.2 acres in size, corresponding to the reduction in the maximum number of turbines from 120 to 76. However, approximately 57.2 acres of the revised archaeological APE was determined to be steeply sloped and therefore did not require archaeological survey per the research design presented by EDR (2016) and approved by NYSOPRHP (Appendix CC). Based on the approved methodology presented in the Phase 1B Archaeological Survey Work Plan, the portion of the archaeological APE for the revised Facility layout that required archaeological survey totaled approximately 221.4 acres. In total, the Phase 1B archaeological survey fieldwork conducted by EDR included 322.8 acres. Therefore, the amount of archaeological survey fieldwork conducted for the Facility (322.8 acres) significantly exceeded the required level of effort that would have been necessary to survey the APE for the revised Facility layout per the approved Phase 1B Archaeological Survey Work Plan and the SHPO Wind Guidelines.

The archaeological survey involved the excavation of 2,184 shovel tests and the pedestrian surface survey of 192.4 acres, from which 79 historic-period artifacts and 65 pre-contact-period artifacts were collected. The Phase 1B survey resulted in the identification of thirteen historic period archaeological sites and nine pre-contact Native American archaeological sites: 11 (50%) historic farmsteads (or components thereof), five (22%) pre-contact lithic scatters, two (9%) pre-contact isolated flakes, one (5%) historic maple sugar processing site, one (5%) historic debris scatter, one (5%) pre-contact isolated projectile point, and one (5%) pre-contact bifacial core. All archaeological sites that meet or potentially meet the S/NRHP criteria for evaluation (i.e., eligible or unevaluated sites) are currently being avoided by the Facility design. Although unevaluated sites have not been formally investigated and evaluated with regard to the S/NRHP, they are being treated as potentially eligible for avoidance purposes.

The Phase 1B Archaeological Survey Report was submitted to the NYSOPRHP via CRIS on November 10, 2017.

(4) Phase 2 Study

All archaeological sites that meet or potentially meet the criteria for listing on the S/NRHP or for which additional (i.e., Phase 2) investigations would be required for evaluation are currently being avoided by the Facility design. Therefore, no Phase 2 investigations are currently recommended for any archaeological sites within the Baron Winds Facility Site. If, due to currently unforeseen circumstances, the avoidance measures employed (such as removing or re-locating Facility components away from identified archaeological sites) are insufficient to avoid impacts, a Phase 2 study may be conducted to assess the boundaries, integrity and significance of cultural resources identified during the Phase 1B archaeological survey. It should be noted that Phase 2 investigations are not warranted for archaeological sites that do not meet the criteria for listing on the S/NRHP. However, if necessary Phase 2 studies would be designed to obtain detailed information on the integrity, limits, structure, function, and cultural/historic context of an archaeological site, as feasible, sufficient to evaluate its potential eligibility for listing on the S/NRHP. The need and scope of work for such investigations would be determined in consultation with NYSOPRHP and New York State Department of Public Service (NYS DPS) if an archaeological site that meets or potentially meets the criteria for listing on the S/NRHP were to be impacted by Facility-related activity.

At this time, no adverse impacts to S/NRHP-eligible or potentially eligible archaeological sites are anticipated. Therefore, no Phase 2 Study will be required.

(5) Archaeological Material Recovered During Cultural Resources Studies

As previously noted, EDR collected a total of 79 historic-period artifacts during the Phase 1B archaeological survey. Seventy-eight were collected from shovel tests and one was collected from the ground surface. In some cases, isolated non-diagnostic artifacts in shovel tests or on the ground surface were observed and noted but not collected. At sites with a surface component, all clearly diagnostic artifacts, and a representative sample of other artifacts, were collected but the entire surface assemblage was not collected. All the historic artifacts collected from shovel tests occurred at or near historically map-documented structure (MDS) locations.

Additionally, EDR collected 65 pre-contact Native American artifacts during the Phase 1B archaeological survey. Twenty-three of the pre-contact artifacts were collected from shovel tests and 42 were collected from the ground surface. All pre-contact artifacts encountered during the Phase 1B survey were collected.

When artifacts were collected in the field, EDR archaeologists recorded standard provenience information and collected each artifact in sealed plastic bags per standard archaeological field practices. All recovered materials

were washed, dried, and cataloged per standard archaeological laboratory procedures. Pending identification of a permanent curation facility, all artifacts are being stored temporarily in 4-mil polyethylene bags in EDR's offices in Syracuse, New York. Recovered artifacts were described to a level of detail sufficient to prepare an artifact inventory for inclusion in the Phase 1B Archaeological Survey Report, which includes descriptions of each artifact's material, temporal or cultural/chronological associations (when possible to ascertain), style, and function (see Appendix CC of this Application). In addition, a selection of representative artifacts was photographed for inclusion in the report. Complete photographic documentation of all of the collected artifacts was not conducted. The Applicant understands that all artifacts recovered during this contract are the property of the land owner from which the artifacts were recovered. The Applicant also anticipates that the Facility's cultural resources consultant will curate any recovered artifacts in a manner consistent with professional standards. If appropriate, the consultant may identify local repositories (such as local historical societies or archaeological museums) for disposition of recovered artifacts. Collected artifacts have been processed in a manner consistent with professional standards, such as the New York Archaeological Council's (NYAC) *Standards for Cultural Resource Investigations and Curation of Archaeological Collections in New York State* (NYAC, 1994; the "NYAC Standards").

A complete listing of all recovered artifacts is included in Appendix E of the Phase 1B Archaeological Survey Report, included with this Application as Attachment CC.

(6) Unanticipated Discovery Plan

An Unanticipated Discovery Plan is included as Appendix DD of this Application. The Unanticipated Discovery Plan identifies the actions to be taken in the unexpected event that resources of cultural, historical, or archaeological importance are encountered during Facility construction. The plan includes a provision for work stoppage upon the discovery of possible archaeological or human remains. Evaluation of such discoveries, if warranted, will be conducted by a professional archaeologist, qualified according to the *NYAC Standards* (NYAC, 1994). The Unanticipated Discovery Plan specifies the degree to which the methodology used to assess any discoveries follows the NYAC Standards. Such an assessment, if required, will be conducted by a professional archaeologist, qualified according to standards of the NYAC.

(b) Historic Resources

(1) A Complete Historic Architectural Survey

EDR prepared a Phase 1A Historic Architectural Resources Survey and Work Plan, which was submitted through the CRIS website on July 5, 2016. The purpose of the Phase 1A Historic Architectural Resources Survey and

Work Plan was to define the Facility's APE relative to historic architectural resources (i.e., the APE for Indirect Effects); determine whether previously identified historic architectural resources are located in the APE; and propose a methodology to identify historic architectural resources within the APE, evaluate their eligibility for the S/NRHP, and assess the potential effect of the Facility on those resources through the use of viewshed analysis. The Phase 1A Historic Architectural Survey & Work Plan defined the APE for Indirect Effects as those areas within 5 miles (8.1 km) of proposed turbines which are within the potential viewshed (based on topography) of a given project, per the SHPO Wind Guidelines (NYSOPRHP, 2006). On July 18, 2016, NYSOPRHP provided a response to the Phase 1A Historic Architectural Survey Report and Work Plan, which concurred with the historic architectural survey methodology and APE proposed by EDR (Appendix EE).

The July 2016 work plan recommended that a historic architectural resources survey be conducted for the Facility. However, it was noted that a significant portion of the study area for the Facility had been recently (2006) surveyed for historic architectural resources as part of the Windfarm Prattsburgh, Cohocton Wind Power, and Howard Wind Farm Projects. Based on previous NYSOPRHP consultation for other wind projects, EDR proposed that no additional historic architectural resources survey would be necessary within these recently surveyed areas, and further proposed a survey only be conducted within the portions of the study area not formally surveyed for historic architectural resources using the standard methodology described below.

As previously noted, the Facility was originally comprised of up to 120 turbines. Following the submission of the Phase 1A Historic Architectural Survey and Work Plan, the Facility layout was revised to only include up to 93 turbines. It was subsequently reduced further to include up to 76 turbines. As part of a telephone consultation on January 12, 2017 regarding this layout change, NYSOPRHP requested an additional work plan be provided summarizing the changes in layout and APE. In addition, NYSOPRHP requested an updated evaluation of the S/NRHP-Eligible Hornell Downtown Historic District.

In response to this request, an Addendum Phase 1A Historic Architectural Survey Work Plan was submitted to NYSOPRHP via the CRIS website on February 22, 2017. The addendum work plan included a revised map summarizing changes in the layout of the Facility, along with a revised APE for indirect visual effects, including a topographic viewshed. As part of the addendum work plan, EDR proposed to conduct a historic resources survey of only those areas not previously surveyed within the revised APE where the topographic viewshed indicated areas of visibility. On March 7, 2017, NYSOPRHP provided a response which concurred with the addendum historic architectural survey methodology and APE proposed by EDR (Bonafide, 2017; see Appendix GG). An historic resources survey for the Facility was subsequently conducted (per the SHPO Wind Guidelines) in accordance with the Phase 1A Historic Architectural Survey and Work Plan (Appendix EE) and the Phase 1A

Addendum Historic Architectural Survey Work Plan (see Appendix GG), developed in consultation with and approved by NYSOPRHP staff.

The Historic Architectural Resources Survey report was submitted to NYSOPRHP via CRIS on April 15, 2017. See Appendix BB. The Historic Architectural Resources Survey report was submitted to NYSOPRHP with the request that NYSOPRHP review the results of the survey and provide determinations of eligibility prior to the completion of a historic resources visual effects analysis for the Facility.

On May 12, 2017, following the submission of the Historic Architectural Survey Report to NYSOPRHP, James Finelli from NYSOPRHP responded with the following information request:

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... 12 North Main St & 8 East Naples Street in Wayland and 4-8 & 14 Maple Ave in Cohocton are set within contemporary commercial blocks. Please review each location and determine whether potential commercial districts are present. Please delineate the boundaries of the potential districts; identifying contributing and non-contributing resources; provide a narrative description and a statement of significance for each.

EDR responded to this information request with a memorandum submitted via CRIS on June 12, 2017, in which they reviewed the potential historic commercial districts in both locations and determined that, due to modern development and modification of historic structures, neither location possessed sufficient historic integrity to warrant designation as a historic district.

On July 28th, 2017, NYSOPRHP provided a response to the results and recommendations of the *Historic Architectural Resources Survey Report*, which included final determinations of eligibility for the S/NRHP. Of the 265 resources identified by EDR as part of the historic architectural resources survey, NYSOPRHP identified the following regarding historic properties located within the five-mile APE for indirect (visual) effects:

- Eight extant properties listed on the S/NRHP are located within the APE for indirect effects, and one property previously listed on the NRHP was found to be no longer extant.
- A total of 105 historic properties were determined to be S/NRHP-eligible, and 143 properties were found to be not eligible for the S/NRHP.

- Six additional previously identified historic properties were also found to be no longer extant, and the S/NRHP eligibility of two previously identified historic properties is undetermined due to lack of public access.

In addition, NYSOPRHP identified “key loci where visual impacts should be assessed,” which are the Village of Cohocton (specifically the NRHP-listed Larowe House), the Village of Wayland, and the Hornell Historic District (Bonafide, 2017). It was also noted that “several of the individual rural agrarian properties will be in the viewshed of a significant number of the proposed towers,” and that potential impacts to the viewshed and setting of these properties should be assessed through visual analysis (Bonafide, 2017).

A copy of all NYSOPRHP correspondence related to the historic architectural resources survey is included in Appendices DD and EE of this Application.

Area of Potential Effect Relative to Historic Architectural Resources

The Facility will have no physical impacts on historic architectural resources (i.e., no historic structures will be damaged or removed). The Facility’s potential effect on a given historic property would be a change (resulting from the introduction of wind turbines) in the property’s visual setting. Therefore, the APE for visual effects on historic resources must include those areas where Facility components (including wind turbines) will be visible and where there is a potential for a significant visual effect. Per the requirements set forth in 16 NYCRR § 1000.2(ar), the study area to be used for analysis of major electric generating facilities is defined as:

“(ar) Study Area: an area generally related to the nature of the technology and the setting of the proposed site. . . . For large facilities or wind power facilities with components spread across a rural landscape, the study area shall generally include the area within a radius of at least five miles from all generating facility components, interconnections and related facilities and alternative location sites. For facilities in areas of significant resource concerns, the size of a study area shall be configured to address specific features or resource issues.”

Per the *SHPO Wind Guidelines*, the APE for visual impacts on historic properties for wind projects is defined as those areas within 5 miles of proposed turbines which are within the potential viewshed (based on topography) of a given project (NYSOPRHP, 2006). The five-mile-radius study area for the Facility includes parts of the Towns of Avoca, Bath, Cohocton, Dansville, Fremont, Howard and Wayland in Steuben County, New York (Appendix BB, Figure 2).

The Facility's APE relative to historic architectural resources includes the areas of potential Facility visibility based on the topographic viewshed located within 5 miles of the Facility (Appendix BB, Figure 8). This area represents a conservative, "worst case" assessment of potential Facility visibility. It is worth noting the preliminary viewshed analysis included in the Phase 1A Historic Architectural Resources Survey and Work Plan was based on a preliminary Facility layout of 120 turbines, which was anticipated to change during the development and permitting of the Facility.

As previously noted, following the submission of the Phase 1A Historic Architectural Resources Survey and Work Plan, the Facility layout was revised to only include up to 93 turbines. It was noted in the work plan that the Facility's APE relative to historic architectural resources might be revised in association with subsequent layout changes during the permitting process, and that Facility changes were likely to result in changes in the size of the APE. The Phase 1A Addendum Historic Architectural Resources Survey Work Plan documented those revisions.

Following the submission of the Phase 1A Addendum Historic Architectural Resources Survey Work Plan, the Facility layout was further revised to only include up to 76 turbines. The Historic Architectural Resources Survey and the Historic Architectural Resources Visual Effects Analysis summarized herein were conducted within the revised APE for the Facility that represents the 76-turbine layout.

Previously Identified Historic Architectural Resources Located in the Area of Potential Effect

The "Previously Identified Historic Architectural Resources" map (see Figure 4 in the appended Historic Architectural Resources Survey report [Appendix BB]) indicates the locations of historic architectural resources identified during the architectural surveys conducted in support of the Windfarm Prattsburgh (PAF, 2006b), Cohocton Wind Power (PAF, 2006c), and Howard Wind Farm (JMA, 2006) projects, as well as those resources identified through review of the APE for the Facility using the CRIS database.

Nine S/NRHP-listed properties, 79 properties previously determined to be S/NRHP-eligible (38 of which contribute to a previously-determined S/NRHP-eligible district), and 93 properties whose S/NRHP eligibility was previously undetermined are located within five miles of the Facility. Of the 79 S/NRHP-eligible properties located within the APE for indirect (visual) effects for the Facility, 75 were surveyed as part of the three previous historic architectural surveys conducted in 2006; the four additional resources were identified by EDR using the CRIS database.² Of

² It is worth noting that several resources were surveyed multiple times as part of the historic resources surveys conducted for the Windfarm Prattsburgh, Howard Wind and Cohocton Wind projects. In addition, several of these resources were also noted in CRIS. Therefore, the number of resources surveyed (79) reflects a total number of unique previously surveyed resources from those surveys (75) as well as any others identified using the CRIS database (4).

the 93 properties within the Facility study area whose S/NRHP-eligibility is currently undetermined, all were identified using the CRIS database.

The nine S/NRHP-listed properties located within the five-mile study area for the Facility are the Larrowe House, the Rowe House, the Presbyterian Church of Atlanta, the Hornell Armory, the Hornell Public Library, the Adsit House, St. Ann's Federation Building, Temple Beth-El, and the Old Post Office. The single previously-identified S/NRHP-eligible district is the Hornell Downtown Historic District.

Within the study area, many S/NRHP-eligible nineteenth-century residences are Italianate or Victorian houses, with some pockets of Gothic Revival-inspired houses. Most of the historic farmhouses are Greek Revival or Greek Revival-inspired vernacular houses. In addition to residences, the S/NRHP-eligible properties within the study area include churches, cemeteries, schools, former railroad stations, commercial buildings, park structures and industrial buildings. Many of the nineteenth- and early-twentieth-century structures located within the study area have not been previously evaluated by NYSOPRHP to determine if they are S/NRHP-eligible. In addition, a significant number of cemeteries dating to the nineteenth and early twentieth centuries are located within the five-mile study area which have not been previously evaluated by NYSOPRHP to determine if they are S/NRHP-eligible.

Methodology to Identify Historic Architectural Resources and Assess Potential Effects of the Facility

Historically significant properties are defined herein to include buildings, districts, objects, structures and/or sites that have been listed on the S/NRHP, as well as those properties that NYSOPRHP has formally determined are eligible for listing on the S/NRHP. Under criteria set forth by the National Park Service for evaluating historic properties (36 CFR § 60.4), a historic building, district, object, structure or site is significant (i.e., eligible for listing on the S/NRHP) if (per CFR, 2004a):

"The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

- (A) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- (B) that are associated with the lives of persons significant in our past; or
- (C) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that

represent a significant and distinguishable entity whose components may lack individual distinction; or
(D) that have yielded, or may be likely to yield, information important in prehistory or history" (NPS, 1990).

The Facility's APE is defined above (and in the appended Historic Architectural Resources Survey [Appendix BB]); however, it is worth noting again that significant portions of the study area for the Facility are located within the areas previously surveyed for the Windfarm Prattsburgh, Cohocton Wind Power, and Howard Wind Farm projects. Therefore, EDR proposed and NYSOPRHP concurred that no additional historic architectural resources survey was necessary within this recently surveyed area, and EDR only conducted a survey within the remaining portions of the study area not formally surveyed for historic architectural resources in conjunction with these earlier projects.

The historic resources survey included review of previous historic architectural surveys within the study area (described above and in Section 2.2 of the Historic Architectural Resources Survey report attached as Appendix BB), consultation with NYSOPRHP (described above and in Section 1.3 of the Historic Architectural Resources Survey report), site visits to identify and evaluate potential historic resources within the study area, and supplemental research on specific historic properties (as necessary). All historic architectural resources fieldwork was conducted by qualified architectural historians who meet the Secretary of Interior's Standards for Historic Preservation Projects (36 CFR Part 61).

Historic resources survey fieldwork included systematically driving all public roads within the study area to photograph and evaluate the S/NRHP-eligibility of previously surveyed structures and properties within the study area. Site visits were conducted October 18-21, 2016, November 17, 2016, and January 19, 2017. When sites were identified that were not previously surveyed but appeared to satisfy S/NRHP-eligibility criteria, EDR's architectural historian documented the existing conditions of the property. This included photographs of the building(s) (and associated property when necessary) and field notes describing the style, physical characteristics and materials (e.g., number of stories, plan, external siding, roof, foundation, and sash), condition, physical integrity, and other noteworthy characteristics for each resource. EDR's evaluation of historic resources within the study area focused on the physical condition and integrity (with respect to design, materials, feeling, and association) to assess the potential architectural significance of each resource.

Note that all properties included in the historic resources survey were photographed and assessed from public rights of way. The condition and integrity of all resources were evaluated based solely on the visible exterior of the structures. No inspections or evaluations requiring access to the interior of buildings, or any portion of private

property, were conducted as part of this assessment. In accordance with the *SHPO Wind Guidelines*, and based on consultation with NYSOPRHP, buildings that were not sufficiently old (i.e., less than 50 years in age), that lacked architectural integrity, or have been evaluated by EDR's architectural historians as lacking historical or architectural significance were *not* included in or documented during the survey.

The completed Historic Architectural Survey Report is part of this Article 10 Application (see Appendix BB) and was uploaded to NYSOPRHP through the CRIS system on April 14, 2017. It is important to note that the Historic Architectural Resources Survey report contained the results of EDR's survey but did not contain a visual effects analysis for historic resources. The Historic Architectural Resources Survey report was submitted so that NYSOPRHP could review the results of the survey and make determinations of eligibility for the properties identified. Following NYSOPRHP's determinations of eligibility, a separate Historic Architectural Resources Visual Impacts Analysis report was prepared and submitted to NYSOPRHP via CRIS on November 8, 2017.

Furthermore, as discussed above, following the submission of the Architectural Survey Report, NYSOPRHP responded with a request for additional information pertaining to two potential commercial S/NRHP districts, one in Wayland and one in Cohocton. EDR evaluated the potential districts and provided a response to NYSOPRHP in memorandum form via CRIS on June 12, 2017. The results of this additional research are included in the assessment of probable Facility construction- and operation-related impacts presented below.

Properties inventoried and evaluated as part of the historic architectural survey included resources that had been identified in previous architectural surveys in the study area, and resources newly identified during this survey. The locations of all properties surveyed (including previously surveyed and newly identified properties) are listed in Table 1 and shown on Figure 8 of the attached *Historic Architectural Resources Survey* (Appendix BB). Photographs of all properties surveyed are included in Appendix B of the report.

A total of 244 previously identified properties (i.e., properties already included in the NYSOPRHP CRIS database as either S/NRHP-eligible or whose eligibility for the S/NRHP has not been formally determined) were re-visited and evaluated as part of the Facility's historic resources survey.

In addition, EDR identified 21 properties within the five-mile study area that had not been previously surveyed for a total of 265 resources evaluated in this survey. Twenty of these newly surveyed properties are S/NRHP-eligible, as recommended by EDR, and the S/NRHP-eligibility of one property is unknown due to lack of public access. The majority of these resources are comprised of rural cemeteries that range from small family plots in remote locations with just a handful of headstones, to large village cemeteries with over 3,300 interments. The earliest

cemetery (Mapleview Cemetery in the Village of Cohocton) dates to 1802. One of these newly identified historic cemeteries was located through mapping and research, but not visible from a public right-of-way. Hence, its S/NRHP-eligibility status remains unknown.

In addition to the historic architectural resources survey, existing visual and aesthetic resources within the visual study area were identified as part of a Visual Impact Assessment (VIA) report for the Baron Winds Project conducted by EDR, which is summarized in Exhibit 24 of this application and attached in its entirety as Appendix GGG. It is important to note that the VIA examined a 10-mile study area around the Facility, whereas the historic resources survey and visual effects analysis discussed here examined a five-mile study area.

The VIA includes an evaluation of the potential visibility of the Facility based on viewshed analysis, field verification, and preparation of representative visual simulations. The visual simulations (included in the VIA report [Appendix GGG]) provide representative views of the potential visual effect of the Facility from a variety of distances and settings within the study area.

(2) A Summary of the Nature of the Probable Impact of Facility Construction and Operation on Any Historic Resources.

Construction of the Facility will not require the demolition or physical alteration of any buildings or other potential historic resources. No direct physical impacts to historic architectural resources will occur as a result of construction or operation of the Facility.

The Facility's potential effect on a given historic property would be a change (resulting from the introduction of wind turbines) in the property's visual setting. As it pertains to historic properties, *setting* is defined as "the physical environment of a historic property" and is one of seven aspects of a property's *integrity*, which refers to the "ability of a property to convey its significance" (NPS, 1990:44-45). The other aspects of integrity include location, design, materials, workmanship, feeling, and association (NPS, 1990). The potential effect resulting from the introduction of wind turbines into the visual setting for any historic or architecturally significant property is dependent on a number of factors including distance, visual dominance, orientation of views, viewer context and activity, and the types and density of modern features in the existing view (such as buildings/residences, overhead electrical transmission lines, cellular towers, billboards, highways, and silos).

As discussed above, the potential visibility and visual impact of the proposed Facility is evaluated in the VIA prepared for the Facility which is summarized in Exhibit 24 and attached as Appendix GGG of this Application.

The potential visibility of the Facility's proposed wind turbines from historic resources (including those that are no longer standing) within the study area is listed in Table 20-2 and depicted in Figure 4 of the attached Historic Resources Visual Effects Analysis (Appendix GG). The visibility analysis includes consideration of two viewshed analyses: one based solely on topography and the other based on the combined potential screening effect of topography and mapped forest vegetation.

Based on the viewshed analysis, one of the eight S/NRHP-listed properties within the APE for indirect effects (Larrowe House) is anticipated to have views of up to 31 proposed wind turbines. The Larrowe House is located approximately 1.4 miles from the nearest turbine in the Village of Cohocton, and will experience some intervening screening from topography and vegetation.³ One S/NRHP-listed resource, the Presbyterian Church of Atlanta (located approximately 4.1 miles from the nearest turbine) will experience views of up to three proposed wind turbines, and the S/NRHP-listed Rowe House (located approximately 4.7 miles from the nearest turbine) will have views of up to two proposed turbines. Field review indicated these latter two resources currently experience views of existing wind turbines, though these views are somewhat screened by topography, vegetation and/or distance (see Insets 1 and 2 in the attached Historic Resources Visual Effects Analysis [Appendix GG]). The remaining five of the S/NRHP-listed properties, all of which are in the City of Hornell, will not experience views of any wind turbines. These resources are located between 4.4 and 4.7 miles from the nearest proposed turbine, and all will have intervening screening provided by vegetation, topography and buildings.

³ A more in-depth analysis of potential views of the Facility from the Larrowe House is provided in Section 5.2.1 of the VIA (see Appendix GGG).

Table 20-2. Visual Effects Analysis for S/NRHP-Listed and S/NRHP-Eligible Resources

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
155	90NR03084	Larrowe House, an Italianate high-style residence circa 1856 (Cohocton Town and Village Hall).	Village of Cohocton	S/NRHP-Listed Resource	S/NRHP-Listed Resource	1.4	30-31
114	09NR06057	Queen Anne-style brick church with bell tower (Presbyterian Church of Atlanta).	Hamlet of Atlanta	S/NRHP-Listed Resource	S/NRHP-Listed Resource	4.1	3
192	90NR02021	Three-story Romanesque Revival-style masonry arsenal with tower circa 1893 (Hornell Armory).	City of Hornell	S/NRHP-Listed Resource	S/NRHP-Listed Resource	4.4	0
193	90NR02020	One-and-a-half-story Beaux Arts-style brick building circa 1911 (Hornell Public Library).	City of Hornell	S/NRHP-Listed Resource	S/NRHP-Listed Resource	4.5	0
205	97NR01248	Single-story brick postal building in the Neo-Georgian style circa 1916 (Old Post Office).	City of Hornell	S/NRHP-Listed Resource	S/NRHP-Listed Resource	4.6	0
197	15NR00119	Single-story yellow brick synagogue circa 1946 (Temple Beth El).	City of Hornell	S/NRHP-Listed Resource	S/NRHP-Listed Resource	4.6	0
196	01NR01767	Four-story Neoclassical-style brick commercial block circa 1910 (St. Ann's Federation Building).	City of Hornell	S/NRHP-Listed Resource	S/NRHP-Listed Resource	4.7	0
112	07NR05717	Two-story Tudor Revival-style residence circa 1926 (Rowe House).	Town of Cohocton	S/NRHP-Listed Resource	S/NRHP-Listed Resource	4.7	0-2
168	10113.000015	One-acre-cemetery with an estimated 95 headstones ca. 1821 (Old Dutch Street [Conderman] Cemetery).	Town of Fremont	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.1	11-57
169	10113.000016	One-quarter-acre cemetery with an estimated 30 headstones circa 1817 (Baldwin Cemetery).	Town of Fremont	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.2	37-39

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
167	10113.000016	One-half-acre cemetery with an estimated 295 headstones circa 1821 (Haskinsville Cemetery).	Town of Fremont	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.4	45-53
134	10109.000057	One-half-acre cemetery with an estimated 125 headstones circa 1884 (St. Paul's Lutheran Cemetery).	Town of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.7	2-14
137	10149.000025	One-and-a-half-acre cemetery with an estimated 530 headstones circa 1868 (Zion Lutheran Cemetery).	Village of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.7	13-26
136	10149.000024	Gothic Revival-style brick church with lancets and tower circa 1923 (St. Paul's Lutheran Church).	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.7	20-31
007	10128.000035	Three-quarter-acre cemetery with an estimated 170 headstones circa 1853 (North Loon Lake Cemetery) .	Town of Wayland	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.8	37-44
171	10113.000023	One-quarter-acre cemetery with an estimated 40 headstones circa 1808 (Big Creek Cemetery).	Town of Fremont	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.8	6-9
133	10109.000058	One-quarter-acre cemetery with 5 headstones circa 1812 (Haight Cemetery).	Town of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.8	3-6
172	10113.000022	Gable front church with pressed stone, wood shingles and tower (Sovereign Grace Baptist Church).	Town of Fremont	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.8	7-11
135	10109.000056	One-quarter-acre cemetery with an estimated 30 headstones circa 1862 (Gaiss Cemetery).	Town of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	0.9	2-33
162	10149.000026	Vacant industrial mill complex circa 1948 (former Birkett Mills).	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.0	18-27

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
140	10149.000011	One-story board-and-batten railroad depot (former Cohocton Station).	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.1	29
147	10149.000014	Two-story Art Deco-style brick school building circa 1934 (Wayland Cohocton Central School).	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.1	29-30
006	10128.000036	Two-and-a-half-acre cemetery with an estimated 700 headstones circa 1813 (Loon Lake Union Cemetery).	Town of Wayland	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.1	28-30
145	10149.000030	Two-story Queen Anne-style residence with hipped roof, lower cross-gables and wraparound porch.	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.2	29-30
163	10149.000027	One-acre cemetery with an estimated 30 headstones circa 1859 (Larowe Cemetery).	Village of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.2	28-29
164	10109.000055	Two-story, five-bay Pre-Railroad era clapboard residence with wing addition circa 1811 (Davis House)	Town of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.2	28-32
148	10149.000032	Mission-style church with tile roof and bell towers circa 1918 (Holy Family Catholic Church).	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.2	31-33
170	10113.000017	Two-acre cemetery with an estimated 750 headstones circa 1839 (Fremont Center Cemetery) .	Town of Fremont	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.2	28-34
154	10149.000013	Two-story Greek Revival-style clapboard residence with gable-front-and-wing massing.	Village of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.3	31
158	10149.000036	Six-acre cemetery with an estimated 2400 headstones circa 1802 (Mapleview Cemetery).	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.4	30-32

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
157	10149.000037	Two-story Greek Revival- and Italianate-style residence with hipped block, cupola and single-story wing.	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.4	26-32
156	10149.000038	Two-story Queen Anne high-style residence with cupola and Eastlake-style porch details.	Village of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.4	30-31
159	10149.000039	Two-story Queen Anne-style residence with square tower and gable end shingles and vergeboards.	Village of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.4	33
177	10113.000020	One-quarter-acre cemetery with an estimated 50 headstones circa 1844 (Amos White Cemetery).	Town of Fremont	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.6	2-4
161	10149.000023	One-acre cemetery with an estimated 615 headstones circa 1838 (Old St. Pius Cemetery).	Town of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.7	30-35
239	10109.000059	One-quarter-acre cemetery with an estimated 30 headstones circa 1844 (Merrill [Parkhill] Cemetery).	Town of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.7	0-32
005	10111.000056	One-acre cemetery with an estimated 85 headstones circa 1822 (Beachville Cemetery).	Town of Dansville	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.7	5-27
008	10128.000032	One-half-acre cemetery with an estimated 240 headstones circa 1813 (East Wayland Cemetery).	Town of Wayland	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.8	0-2
009	10128.000034	Two-story Greek Revival-style residence with gable-front-and-wing massing and farm buildings.	Town of Wayland	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	1.9	2-35
004	10111.000057	One-half-acre cemetery with 11 stones standing circa 1818 (Cream Hill Cemetery).	Town of Dansville	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	2.0	31-37

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
240	10118.000019	One-half-acre cemetery with an estimated 150 headstones circa 1826 (Allen Cemetery) .	Town of Howard	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	2.4	11-19
010	10128.000033	Two-story Queen Anne-style brick and clapboard residence with round tower and porte cochere.	Town of Wayland	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	2.4	0-36
264	10102.000048	Two-story Stick-style clapboard church with tower and attached lodgings (United Methodist Church).	Town of Avoca	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	2.6	25-27
258	10102.000042	Two-story Greek Revival-style clapboard residence with side-gable-and-wing massing and porch.	Town of Avoca	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	2.6	19-22
260	10102.000044	One-quarter-acre cemetery with an estimated 115 headstones circa 1835 (Wallace Cemetery).	Town of Avoca	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	2.7	27-29
259	10102.000043	Two-story, four-bay, Italianate-style brick residence with shallow hipped roof and full length porch.	Town of Avoca	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	2.7	23-25
166	10113.000013	One-quarter-acre cemetery with an estimated 18 headstones circa 1811 (Windom Hill Cemetery).	Town of Fremont	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	2.7	0-66
180	10113.000019	Four-acre cemetery with an estimated 2200 headstones circa 1919 (St. Mary's Cemetery).	Town of Fremont	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.1	0-49
245	10118.000024	One-story former brick school with arched entrance and decorative cast stone panels.	Town of Howard	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.2	11-13
244	10118.000023	Wood clapboard and shingle church with cross-gable massing and central tower (Howard Union Church).	Town of Howard	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.3	12-14

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
247	10118.000026	Two-story Italianate-style clapboard residence with cupola and porches (Baldwin House).	Town of Howard	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.3	12-16
238	10117.000033	One-acre cemetery with an estimated 85 headstones circa 1845 (Nicholson Cemetery).	Town of Hornellsville	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.4	66-68
003	10111.000055	Two-story, Stick-style, "L"-shaped clapboard residence with center gables and decorative trusses.	Town of Dansville	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.5	0-2
250	10118.000027	Four-and-a-half-acre cemetery with an estimated 2200 headstones circa 1827 (Howard Cemetery).	Town of Howard	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.5	17-20
254	10118.000018	Two-story Victorian-style residence with gable-front-and-wing-massing and porch within the "L".	Town of Howard	Not S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.6	0-13
256	10102.000041	One-acre cemetery with an estimated 350 headstones circa 1838 (Vale of Rest Cemetery).	Town of Avoca	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	3.9	23-27
002	10111.000054	Three-acre cemetery with an estimated 1150 headstones circa 1830 (Rogersville Forest Lawn Cemetery).	Town of Dansville	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.0	5-6
126	10109.000043	Two-story, five-bay Georgian-style clapboard saltbox residence with cornice dentils and 6/6 windows.	Town of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.1	4-71
110	10109.000050	One-quarter-acre cemetery with an estimated 30 headstones circa 1861 (Bowles Corners Cemetery).	Town of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.1	0-26
115	10109.000063	Two-story Colonial Revival-style stone and clapboard residence with hipped roof and Neoclassical porch.	Hamlet of Atlanta	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.2	3

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
182	10117.000034	Two-story vernacular farmhouse with two sheds and three barns circa 1920 (Jones Farm).	Town of Hornellsville	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.2	4-17
116	10109.000064	Two-and-a-half-story Stick-style clapboard residence with decorative gable trusses and tower.	Hamlet of Atlanta	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.3	3
111	10109.000051	Two-story vernacular fieldstone residence with gable-front-and-wing massing and porch with shed roof.	Town of Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.3	2
012	10128.000031	Two-and-a-half-acre cemetery with an estimated 350 headstones circa 1878 (Old St Joseph Cemetery).	Town of Wayland	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.4	28-31
119	10109.000069	Eight-acre cemetery with an estimated 3300 headstones circa 1891 (Clearview Cemetery).	Hamlet of North Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.5	0-3
023	10156.000094	Two-story Queen Anne-style clapboard residence with spindle work detailing and shingled gables.	Village of Wayland	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.6	31-34
035	10156.000009	Two-and-a-half story Shingle-style residence with tower and bracketed, flared eaves.	Village of Wayland	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.6	32-33
118	10109.000070	Three-quarter-acre cemetery with an estimated 150 headstones circa 1819-84 (Old Clearview Cemetery).	Hamlet of North Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.6	0-2
019	10156.000181	Two-story Italianate-style clapboard residence with full length porch and decorative brackets.	Village of Wayland	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.6	35-37
187	10117.000032	Two-acre pet cemetery circa 1907 (Hornell Area Humane Society Pet Cemetery)	City of Hornell	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.7	26-31

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
184	10141.000950	Twenty-acre cemetery with an estimated 7950 headstones circa 1846 (Rural Cemetery).	City of Hornell	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.7	0-33
185	10141.000951	Nineteen-acre cemetery with an estimated 6043 headstones circa 1801 (Hope Cemetery).	City of Hornell	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.7	0-31
030	10156.000186	Seven-acre cemetery with an estimated 2000 headstones circa 1838 (Wayland Village Cemetery).	Village of Wayland	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.7	31-41
123	10109.000065	Two-story Victorian-style brick residence with decorative gable woodwork and jigsaw trim porch railing.	Hamlet of North Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.7	6-7
189	10141.000954	Eight-acre cemetery with an estimated 3456 headstones circa 1855 (St. Ann's Cemetery).	City of Hornell	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.7	0-16
181	10147.000013	Two-story, five-bay, Georgian and Federal-style clapboard residence circa 1805 (Hurlbut House).	Village of Arkport	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.8	1
015	10156.000178	Two-story Mansard-style asymmetrical residence with flared roof, dormers, and recessed door.	Village of Wayland	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.8	38-40
132	10109.000061	One-quarter-acre cemetery with an estimated 25 headstones circa 1818 (Lent Hill Cemetery).	Town of Cohocton	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.8	20-43
120	10109.000068	Two-story Italianate-style residence with hooded gable window and decorative porch supports.	Hamlet of North Cohocton	S/NRHP-Eligible Resource (NYSOPRHP Determined)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.8	6
183	10117.000035	Six-acre cemetery with an estimated 444 headstones circa 1883 (Robertson Cemetery).	City of Hornell	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.8	34-39

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
001	10111.000053	Three-quarter-acre cemetery with an estimated 90 headstones circa 1821 (North Oak Hill Cemetery).	Town of Dansville	S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (NYSOPRHP Determined)	4.9	66-71
227	10141.000027	Two-story commercial block with cream colored brick and second story rectangular windows.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.5	0
226	10141.000533	Two-story commercial block with cream colored brick and flat arched openings on first floor.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
223	10141.000023	Stone church with two square towers flanking a stained glass window (United Presbyterian Church).	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
229	10141.000040	Two-story, eight-bay square commercial block with cream colored brick and square windows.	City of Hornell	Not S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
230	10141.000415	Three-and-half story, Second Empire-style brick commercial block with mansard roof and dormers.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
231	10141.000816	Three-story brick commercial block with window shutters and decorative cornice.	City of Hornell	Not S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
228	10141.000030	Three-story Victorian-style brick commercial block with double-height bay window.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
206	10141.000891	Three-story, two-part brick commercial block with arched windows and single-story addition.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
204	10141.000826	Three-story, two-part brick commercial block with storefront and paired rectangular windows above.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
203	10141.000825	Three-story, seven-bay, Italianate-style brick commercial block with storefront and stone quoins.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
222	10141.000042	Three-story, five-bay, square brick commercial block with flattened arch window hoods.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
207	10141.000822	Two-story, two-part Beaux Arts-style brick commercial block with chamfered corner circa 1921.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
220	10141.000032	Two-story, four-bay brick commercial block with two storefronts and corbelled cornice.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
221	10141.000041	Three-story, three-bay brick commercial block with storefront, corbelled cornice and arched windows.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
202	10141.000824	Three-story, 11-bay brick commercial block with four storefronts (Seneca Street Station).	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
219	10141.000031	Two-story Italianate-style brick commercial block with arched windows and bracketed cornice.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
201	10141.000823	Three-story, two-part brick commercial block with glazed storefront and rectangular windows above.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
209	10141.000819	Two-story Victorian-style brick commercial block with upper-story double-height bay windows.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
216	10141.000026	Three-story, nine-bay brick commercial block with corbelled cornice and pilasters.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
215	10141.000025	Two-story, three-bay brick commercial block with corbelled cornice and square upper story windows.	City of Hornell	Not S/NRHP-Eligible Resource (EDR Recommended)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
200	10141.000421	Three-story, two-part brick commercial block with glazed storefront and arched windows above.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
213	10141.000022	Three-story, three-bay brick commercial block with storefront, corbelled cornice, and window hoods.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
214	10141.000024	Two-story, seven-bay brick commercial block with storefronts, corbelled cornice and window hoods.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
199	10141.000820	Two-story, two-part brick commercial block with glazed storefront and arched windows above.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
212	10141.000021	Three-story, four-bay brick commercial block with storefront, corbelled cornice, and window hoods.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
211	10141.000020	Three-story Beaux Arts- and Neoclassical-style commercial block circa 1895 (Hollands Bldg/City Hall).	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
198	10141.000818	Single-story one-part commercial block with two plate glass storefronts and bracketed cornice.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0

Survey ID	NYSOPRHP Unique Site Number (USN)	Name, Address and/or Description	Municipality	S/NRHP Eligibility Recommendation (EDR)	S/NRHP Eligibility Determination (NYSOPRHP)	Distance to Nearest Turbine (Miles)	Number of Turbines Potentially Visible
210	10141.000017	Two-story masonry temple-front bank with recessed entrance circa 1920 (Steuben Trust Co/City Hall).	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
237	10141.000046	Three-story Chateausque-style commercial block with elaborate brickwork and roof pinnacles.	City of Hornell	S/NRHP-Eligible Resource (District) (NYSOPRHP Determined)		4.6	0
235	10141.000035	Three-story, Italianate-style brick commercial buiding with quoins and bracketted tower.	City of Hornell	NRHP-Eligible Resource (District) (NYSOPRHP Determined)	NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
234	10141.000036	Three-story, Victorian-style brick commercial block with two double-height bay windows.	City of Hornell	NRHP-Eligible Resource (District) (NYSOPRHP Determined)	NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.6	0
233	10141.000037	Two-story, Art Deco-style, yellow brick commercial block with triangular plan (Landman Building).	City of Hornell	NRHP-Eligible Resource (District) (NYSOPRHP Determined)	NRHP-Eligible Resource (District) (NYSOPRHP Determined)	4.7	0

Based on the viewshed analysis of the 105 properties within the APE determined by NYSOPRHP to be NRHP-eligible:

- A total of 18 properties will have views of between 1 and 15 proposed turbines. These properties are located between 0.8 and 4.7 miles from the nearest proposed turbine.
- A total of 20 properties will have views of between 16 and 30 proposed turbines. These properties are located between 0.7 and 4.2 miles from the nearest proposed turbine.
- A total of 28 properties will have views of between 31 and 45 proposed turbines. These properties are located between 0.2 and 4.8 miles from the nearest proposed turbine.
- A total of three properties will have views of between 46 and 60 proposed turbines. These properties are located between 0.1 and 3.1 miles from the nearest proposed turbine.
- A total of four properties will have views of between 61 and 71 proposed turbines. These properties are located between 2.7 and 4.9 miles from the nearest proposed turbine.
- A total of 32 properties will have no views of the Facility. It is worth noting that all of these properties are located within the NRHP-eligible Hornell Historic District.
- No properties will have views of all 76 proposed turbines.

Based only on the screening provided by topography, the blade tip viewshed analysis indicates some portion of the proposed turbine array could potentially be visible from approximately 74 percent of the visual study area (see Figure 4 in the attached Historic Resources Visual Effects Analysis [Appendix GG]). This "worst case" assessment of potential visibility indicates the area where any portion of any turbine could potentially be seen, without considering the screening effect of existing vegetation and structures. Review of the turbine count analysis indicates that in most locations where Facility visibility is indicated, greater than 15 proposed turbines would be visible.

The field review conducted as part of the historic resources survey indicated that existing buildings, street trees, yard vegetation, utility poles, and other objects obstruct distant views out of the Villages of Cohocton, Howard, and South Dayton as well as the many hamlets located within the study area, and screen views of the Facility, particularly within the residential core of these settlements where most of the historic resources are located. Potential views of the Facility from within the villages were limited to the edges of the developed areas, where gaps between buildings allow for more partial and/or distant views toward the Facility Site. From areas where partial views of the Facility are available, the Facility will be a minor component in the background of the view and is not expected to have a significant effect on the visual setting associated with historic resources in the villages and hamlets located within the study area.

Additionally, actual Facility visibility is likely to be more limited than suggested by viewshed mapping. This is due to the fact that trees within the study area provide more extensive and effective screening than assumed in these analyses

(e.g., vegetation is more extensive than indicated on the USGS NLCD, and often taller than 40 feet in height), and screening provided by buildings is significant within more developed areas (e.g., the villages, hamlets, and lakefront residential areas).

Because it accounts for the screening provided by mapped forest stands, the vegetation viewshed is a much more accurate representation of potential Facility visibility. However, it is important to note that because screening provided by buildings and street/yard trees, as well as characteristics of the proposed turbines that influence visibility (color, narrow profile, distance from viewer, etc.), are not taken consideration in the viewshed analyses, being within the viewshed does not necessarily equate to actual Facility visibility.

According to the NYSDEC Visual Policy, simple visibility of the Facility from any of the viewing locations does not imply detrimental effect to the beauty or structure. The policy specifically states “Aesthetic impact occurs when there is a detrimental effect on the perceived beauty of a place or structure. Significant aesthetic impacts are those that may cause a diminishment of the public enjoyment and appreciation of an inventoried resource, or one that impairs the character or quality of such a place. Proposed large facilities by themselves should not be a trigger for declaration of significance. Instead, a project by virtue of its siting in a visual proximity to an inventoried resource may lead staff to conclude that there may be a significant impact” (NYSDEC, 2000).

It is also worth noting these areas also feature views of existing wind energy projects (namely Cohocton Wind and Howard Wind) that diminish the integrity of the setting of nearby historic resources (see Insets 1 and 2 in the attached Historic Resources Visual Effects Analysis [Appendix GG]). Therefore, while the introduction of additional turbines from the Facility into the view may somewhat compound the visual effects on historic resources, the Facility will not have a significant cumulative impact on historic architectural resources that already experience views of existing wind projects. The VIA for the Facility concluded the following regarding the potential for cumulative visual impacts (see Exhibit 24; Appendix GGG):

“Consequently, although there may be locations where the cumulative effect of the existing and proposed wind projects is substantial, these instances will be relatively rare, will affect a limited number of viewers, and/or will not affect sites or receptors that are particularly sensitive to visual change. Thus, the addition of a limited number of new turbines to a working agricultural landscape where these features already exist is not expected to have a significant cumulative visual impact” (EDR, 2017:163).

The potential visual effect of the Facility’s proposed overhead collection line was not explicitly addressed in the Historic Architectural Resources Survey report (Appendix BB). However, the Visual Impact Assessment (EDR, 2017) prepared

for the Facility, which has been included as Appendix GGG of this Article 10 Application and is summarized in Exhibit 24, does address the visibility and visual impact of the overhead collection line. The historic properties identified in the Historic Architectural Resources Survey (Appendix BB) are included as a category of visually sensitive sites that are considered in the VIA (see Section 3.6 and Figure 6 in the VIA report [Appendix GGG]). In addition, the VIA report includes a discussion, viewshed maps (Figure 9: Sheet 2 in Appendix GGG) and a visual rendering (Figure 13 in Appendix GGG) that address the potential visibility and visual effect of the overhead collection line. The VIA concludes with respect to overhead collection lines as follows:

“The topographic viewshed analysis indicates that approximately 77.6% of the area within one mile of the overhead collection line may potentially have views of the proposed structures. The remaining 22.4% of the area includes topographic depressions such as Hinkle Hollow and Oil Well Hollow, which will largely be screened from view. Factoring vegetation into the analysis greatly reduces potential visibility to 32.1% of the 1-mile study area, however, most elevated open areas within one mile of the overhead collection line will potentially have views of the proposed structures” (EDR, 2017: 76).

To further supplement this discussion, there are four properties that NYSOPRHP/SHPO determined to be NRHP-eligible located within one-mile of the proposed overhead collection line, which are listed in Table 20-3 below.

Table 10-3. S/NRHP-Eligible Resources Within One Mile of Overhead Collection Line

Survey ID	NYSOPRHP #	Address	Description	Municipality	Determination of S/NRHP Eligibility (NYSOPRHP)	Distance to overhead collection line (miles)	Potential Overhead Generation Line Visibility ¹
137	10149.000025	West side of South Dansville Road	One-and-a-half-acre cemetery with an estimated 530 headstones circa 1868 (Zion Lutheran Cemetery).	Village of Cohocton	S/NRHP-Eligible	0.7	No
134	10109.000057	West side of Davis Hollow Road	One-half-acre cemetery with an estimated 125 headstones circa 1884 (St. Paul's Lutheran Cemetery).	Town of Cohocton	S/NRHP-Eligible	0.8	Yes

Survey ID	NYSOPRHP #	Address	Description	Municipality	Determination of S/NRHP Eligibility (NYSOPRHP)	Distance to overhead collection line (miles)	Potential Overhead Generation Line Visibility ¹
136	10149.000024	97 Maple Avenue	Gothic Revival-style brick church with lancets and tower circa 1923 (St. Paul's Lutheran Church).	Village of Cohocton	S/NRHP-Eligible	0.8	Yes
135	10109.000056	East side of Davis Hollow Road	One-quarter-acre cemetery with an estimated 30 headstones circa 1862 (Gaiss Cemetery).	Town of Cohocton	S/NRHP-Eligible	0.9	Yes

¹ All four S/NRHP-eligible properties in Table 20-3 are located within areas of wind turbine visibility (see Figure 8, Sheet 2 of Appendix GG).

Three of the four properties determined to be S/NRHP-eligible by NYSOPRHP are located in areas with potential visibility of the proposed overhead collection line, based on the viewshed analysis that was prepared for the VIA report (reproduced as Figure 5, Appendix GG).

Representative photographs of the S/NRHP-eligible properties located within one-mile of the overhead collection line, as well as a discussion of the existing visual environment and potential visual impacts of the proposed overhead collection line are presented in Appendix GG.

In addition to the viewshed analysis, a set of 21 visual simulations were prepared for the Facility's VIA report (Appendix GGG). These simulations provide representative views of the proposed Facility from a variety of landscape settings, directions, and viewing distances from within the Facility's visual study area. Although most of these simulations do not necessarily represent the views of or from specific historic properties, the simulations do provide representative depictions of the Facility's potential effect on the visual settings associated with historic properties within the study area. Full size images of all of the simulations are included in the VIA report (EDR, 2017c) and included as Appendix B of the Historic Resources Visual Effects Analysis (Appendix GG).

The simulations that best represent the potential visual effect on two of the "key loci" identified by NYSOPRHP as part of consultation for the Facility (Bonafide, 2017) include the simulations from Viewpoints 37 (Larrowe House), and 43 and 66 (rural agrarian properties), which are included as Insets 4-6 and 12-15 in the attached Historic Resources Visual Effects Analysis (Appendix GG). The evaluation of the Facility's potential visual effect at each of these locations is

presented in detail in the VIA (Exhibit 24; Appendix GGG) and summarized in the attached Historic Resources Visual Effects Analysis (Appendix GG). In addition, a detailed assessment of the potential visual effects from the remaining key loci identified by NYSOPRHP (the Village of Wayland and the Hornell Downtown Historic District) is provided in the Historic Resources Visual Effects Analysis (Appendix GG) through use of wireframe simulations.

In summary, based on field review and visual simulations prepared as part of the VIA for the Facility, it is anticipated that the Baron Winds Facility will not have a significant adverse visual impact on historic resources listed in or eligible for listing in the NRHP. Although the viewshed analysis in Figure 4 of the *Historic Resources Visual Effects Analysis* (Appendix GG) indicates considerable Facility visibility within approximately 75 percent of the five-mile study area, field review and visual simulations revealed that views from the Villages of Wayland and Cohocton, and City of Hornell (which were identified by NYSOPRHP as locations where visual impacts should be carefully assessed) toward the Facility would be largely screened by intervening vegetation, buildings and topography. With regard to the concerns expressed by NYSOPRHP regarding rural, agrarian properties, although construction of the Facility will result in a change to the predominantly rural, agrarian landscape and setting of much of the Facility Area and five-mile study area, it is likely that the qualities that contributed to the historic significance of properties determined by NYSOPRHP to be S/NRHP-eligible will not be adversely impacted by the Facility.

Operational Noise/Vibration Impacts (see Exhibit 19)

The noise impacts assessment is discussed in detail in Exhibit 19, and a Preconstruction Noise Impact Assessment (PNIA) is included as Appendix Z. This subsection focuses on potential operational noise/vibration impacts to S/NRHP-eligible historic properties within the five-mile historic architectural study area. Construction-related noise/vibration impacts are not considered because they will be short-term and temporary in nature.

Relevant to noise and vibration impacts to S/NRHP-eligible cultural resources, the implementing regulations for New York State Parks, Recreation and Historic Preservation Law, Section 14.09 (9 NYCRR § 428.7) state:

- a. In determining whether an undertaking will have an adverse impact on eligible or register property, the commissioner shall consider whether the undertaking is likely to cause:
 1. destruction or alteration of all or part of the property;
 2. isolation or alteration of the property's environment;
 3. *introduction of visual, audible or atmospheric elements which are out of character with the property or alter its setting;*
 4. neglect of the property resulting in its deterioration or destruction. [emphasis added] (9 NYCRR § 428.7))

In addition, the Federal Regulations entitled "Protection of Historic Resources" (36 CFR Part 800) include in Section 800.5(2) a discussion of potential adverse effects on historic resources:

"Adverse effects on historic properties include, but are not limited to: . . . (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance; [and] (v) *Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features.* . . ." (CFR, 2004b). [emphasis added]

Noise impacts are not of concern for any of the archaeological sites identified within or near the Facility Site. Due to the nature of the archaeological sites (primarily small prehistoric lithic scatters and historic farmsteads), integrity of setting and feeling are not considered significant aspects of integrity for any unevaluated/potentially S/NRHP-eligible archaeological sites within the Facility Site. Therefore, there will be no effect to archaeological sites from noise and/or vibration associated with the operation of the proposed Facility.

Although turbine noise and vibrations may be considered annoying to some listeners, noise impacts to S/NRHP-eligible historic properties within the Baron Winds five-mile historic architectural study area are anticipated to be relatively insignificant.

Similar to visual impacts to historic properties, noise and vibration impacts are greatest at properties in closer in proximity to turbines. Only three eligible properties (approximately 3%) are located within 0.5 miles (0.8 km) of the nearest turbine. These three properties are anticipated to experience noise levels of between 43 and 44 dBA $L_{eq(8)}$ during Facility operation. Noise at these levels will not interfere with indoor speech and is well below the level that can cause hearing impairment. All properties located outside of 0.5 miles from the nearest turbine (97% of eligible properties) will experience noise levels below 45 dBA $L_{eq(8)}$ with noise levels decreasing with distance from the turbine. Ambient noise levels of 45 dBA $L_{eq(8)}$ and below are consistent with sound levels suggested by various noise guidelines (i.e., WHO, NYSDEC, etc.) (see Exhibit 19). As a result, the noise generated by nearby wind turbines is not anticipated to constitute a significant adverse impact to the setting of S/NRHP-listed or eligible historic resources within the five-mile study area.

The Facility has been sited with turbines and the collection substation located primarily in undeveloped areas away from population centers, such as villages and town centers, in order to minimize visual and audio impacts to area residences and historic properties. Furthermore, ambient noise levels are expected to be slightly higher in more developed areas (i.e., villages and town centers) due to increased vehicle traffic and other noises associated with

greater population density. Therefore, any potential noise impacts from the proposed turbines and collection substation are not expected to be significant in these areas.

Based on the above analysis, and that contained in Exhibit 19, potential noise and/or vibrations caused by the operation of the proposed Facility are not expected to significantly alter the character or setting of S/NRHP-listed and -eligible historic properties within the five-mile Study Area. Vibrations are not anticipated to impact any S/NRHP-listed or -eligible properties and noise-related impacts are anticipated to be relatively minimal, due in large part to the Facility's siting in remote rural areas away from areas of higher historic and modern population density. Any elevated noise and vibration levels related to Facility construction will be short-term and temporary in nature. Therefore, there will be no permanent noise-related adverse impacts to S/NRHP-listed or eligible properties.

Mitigation

Mitigation options are limited, given the nature of the Facility and its siting criteria (very tall structures some of which are located in open fields at the highest locally available elevations). However, in accordance with NYSDEC Program Policy (NYSDEC, 2000), and as described in the VIA report for the Facility (Exhibit 24; Appendix GGG) various mitigation measures were considered.

Mitigation for impacts to historic properties typically consist of projects that benefit historic properties and/or the public's appreciation of historic resources to offset potential impacts to historic properties resulting from the introduction of wind turbines into their visual setting. Mitigation projects that have been proposed for other wind energy projects in New York State have included activities such as additional historic resources surveys, S/NRHP nominations, monetary contributions to historic property restoration causes, development of heritage tourism promotional materials, development of educational materials and lesson plans, and development of public history materials, such as roadside markers.

As part of the Article 10 review process, the Applicant has consulted with local stakeholders to determine what are the most appropriate and realistic projects to undertake within the Towns of Cohocton, Dansville, Fremont and Wayland. Outreach letters were sent to representative organizations with an interest in or direct involvement in the promotion of history in the towns where wind turbines are located on October 6, 2017 requesting that stakeholders respond by October 27, 2017 indicating their interest in participation in the mitigation process. Response letters were received from stakeholders from the Towns of Cohocton and Wayland. A Preliminary Cultural Resources Mitigation Plan (Appendix HH) has been prepared by EDR summarizing the projects proposed by the stakeholders and recommendations from EDR, and identifying the next steps in the cultural resources mitigation process.

The plan will be submitted to NYSOPRHP for their review and concurrence; however, cultural resources mitigation will not formally begin until it is initiated by the U.S. Army Corps of Engineers (USACE) as the involved federal agency under Section 106 of the National Historic Preservation Act (NHPA). Consultation with USACE, NYSOPRHP, DPS, and local stakeholders will be ongoing, resulting in a Memorandum of Agreement between all involved agencies and parties outlining the projects to be undertaken as a result of the cultural resources mitigation process, including total offset funding.

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